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Dear Alastair,

Notice of Statutory Consultation on a proposal to modify the Special Conditions of the electricity transmission licence held by National Grid Electricity Transmission plc (NGET) to facilitate the introduction of an Electricity System Restoration Standard.

We refer to the above Notice dated 2 July 2021. This response is made on behalf of National Grid Electricity Transmission plc (NGET).

We welcome the opportunity to respond to this Statutory Consultation on the proposed licence changes to amend Special Conditions 1.1 and 3.14 of NGET's electricity transmission licence. We have no substantive comments on the form of licence drafting being consulted on.

We note that we have also been served with a notice of statutory consultation on proposals to modify standard conditions C1 and C16 of the electricity transmission licence. However, these conditions only apply to the electricity System Operator and are not in effect in the transmission licence of NGET (or any other transmission owner). NGET is therefore not a "relevant licensee" for the purposes of being served with a copy of this notice under section 11A (4) Electricity Act 1989. Nevertheless, we have no substantive comments on the proposed modifications to standard conditions C1 and C16 (which will apply to the NGESO licence only).

We note that the open letter accompanying the statutory consultation sets out Ofgem's responses to the points raised by stakeholders in response to the initial consultation in April 2021. In particular we note that the points previously raised by NGET continue to apply and will need to be borne in mind through the code modification processes that are to follow implementation of the licence changes. We would welcome further dialogue with Ofgem (as invited in the open letter) in relation to the triggering of investment works identified by the ESO in order to meet the standard and the timescales for their implementation and note that Ofgem recognise that these issues will need to be considered during the development of industry code modifications related to the Electricity System Restoration Standard.

For queries in relation to our consultation response please contact Leanne.Evans@nationalgrid.com or Paul.Gallagher@nationalgrid.com

Yours, sincerely,
Leanne Evans

Regulatory Development Manager, Regulation, National Grid Electricity Transmission