Alastair Owen

OFGEM

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Canary Wharf

London

E14 4PU

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Dear Alastair,

**Statutory Consultation on licence amendments to facilitate the introduction of an Electricity System Restoration Standard.**

Thank you for the opportunity to comment on the proposed changes set out in this consultation. This response is submitted on behalf of Scottish and Southern Electricity Network’s (SSEN) distribution networks, Scottish Hydro Electric Power Distribution and Southern Electric Power Distribution.

We recognise the proposed amendments to the Distribution Licence as sensible and proportionate, while reflecting the changes caused by the introduction of the Electricity System Restoration Standard (ESRS).

We would like to make two points about wider aspects of the ESRS. Firstly, network licensees may face costs associated with the implementation of the Standard. We would like to understand these costs and how they will be recovered. Secondly, whilst the responsibility for the management of the ESRS ultimately lies with the ESO, all industry participants have a role in restoring normal operation of the electricity system following total or partial shutdown. It is, therefore, key that the ESO’s activities in this area are coordinated to mitigate the risk of service conflicts.

We look forward to continuing these discussions in the working group meetings.

Yours sincerely

Ross Bibby  
Senior Analyst – Distribution Regulation