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We are consulting on Scottish Hydro Electric Transmission's plc (SHET's<sup>1</sup>) initial needs case submission under the Medium Sized Investment Projects (MSIP) re-opener mechanism for the installation of a harmonic filter in the southwest (Kintyre Peninsula) region. We particularly welcome responses from those with an interest in electricity transmission and distribution networks. We also welcome responses from other stakeholders and the public.

This document outlines the scope and purpose of the consultation, the consultation questions, and explains how you can get involved. Once the consultation is closed, we will consider all responses. We want to be transparent in our consultations. We will publish the non-confidential responses we receive alongside a decision on next steps on our website at <u>ofgem.gov.uk/consultations</u>. If you want your response – in whole or in part – to be considered confidential, please tell us in your response and explain why. Please clearly mark the parts of your response that you consider to be confidential, and if possible, put the confidential material in separate appendices to your response.

<sup>&</sup>lt;sup>1</sup> Scottish Hydro Electric Transmission plc (SHET) is an electricity transmission licensee that trades under the name Scottish & Southern Electricity Networks Transmission (SSENT).

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### **1. Introduction**

- 1.1 Network companies are natural monopolies. Effective regulation of privatised for-profit monopolies is essential to ensure they cannot unfairly exercise their monopoly power to the detriment of their customers. This is particularly important in the case of essential utilities, such as energy, where consumers have no choice on whether or not to pay what they are charged. It is therefore crucial that an effective regulator protects energy consumers by controlling how much network companies can charge their customers. Ofgem<sup>2</sup> does this through periodic price controls that are designed to ensure network companies are properly incentivised to deliver the best possible outcomes for current and future energy consumers. This includes ensuring that consumers only pay for investments that are needed and do not overpay for those investments.
- 1.2 The current price control model is known as RIIO (Revenue = Incentives + Innovation + Outputs). RIIO-ET2 is the second electricity price control under the RIIO model and runs from 1 April 2021 until 31 March 2026. It includes a range of Uncertainty Mechanisms (UMs) that allow us to assess applications for further funding during RIIO-ET2 as the need, cost or timing of proposed projects becomes clearer. This ensures that consumers fund projects only when there is clear evidence of benefit, and we have clarity on likely costs and cost efficiency. These mechanisms also ensure that the RIIO-ET2 price control has flexibility to adapt as the pathways to Net Zero become clearer.
- 1.3 Where possible, we have set automatic UMs, such as the Generation and Demand Connection Volume Drivers, which provide Electricity Transmission Owners (ETOs) with immediate funding when they are required to undertake new customer connection works. In other areas, where the degree of uncertainty is too great to allow for an automatic mechanism, we set "re-openers" which will allow us to assess ETO proposals robustly, once sufficiently accurate information is made available.
- 1.4 The MSIP re-opener provides ETOs with an annual opportunity to request additional funding for sub £100m projects, many of which may be critical for achieving Net Zero targets. It was developed to ensure that ETOs are able to

 $<sup>^2</sup>$  Ofgem refers to the Gas and Electricity Markets Authority. Ofgem is the office of the Authority. The terms the 'Authority', 'Ofgem', 'we' and 'us' are used interchangeably in this document.

undertake necessary investments in the transmission network, funding for which has not been provided in RIIO baseline allowances.

- 1.5 An ETO can submit a request for additional funding via the MSIP re-opener during specific "windows" (between 24 and 30 April 2021 and between 25 and 31 January in each subsequent regulatory year of the RIIO-ET2 price control period) where it considers and the Authority agrees that a project is covered under the areas listed in RIIO-ET2 Final Determinations (FDs), as implemented by Special Condition 3.14 of its licence (the Licence) (SpC 3.14).<sup>3</sup> Projects within the scope of that licence condition will be considered and scrutinised by Ofgem to establish the level of efficient costs to be remunerated. For the application covered in this consultation, we have only assessed SHET's initial needs case and we will assess the full submission, including the final needs case and costs, when SHET submits them at a later date.
- 1.6 In the January 2023 reopener window, SHET submitted three applications, of which one is initial needs case submission and the other two are full applications. This document summarises our assessment of the initial needs case submission for the Southwest Harmonic Filter project<sup>4</sup>: installation of a harmonic filter in the southwest (Kintyre Peninsula) region of the SHET transmission licence area. We will separately consult on our assessment of the full applications and the costs application at a later date.
- 1.7 We welcome views from stakeholders on our draft determinations concerning the projects outlined in Chapter 2, which propose acceptance of the initial needs case for the project.

#### MSIP submission, assessment, and approval process

- 1.8 ETOs have a duty to provide connections to users and to develop and maintain an efficient, co-ordinated, and economical transmission network. Therefore, it is for an ETO to decide when it is the right time to initiate a new project that may be needed during the RIIO-ET2 price control period.
- 1.9 Transmission projects can be driven by factors outside the direct control of the ETOs, for example where a customer requires a grid connection, and can mean

<sup>&</sup>lt;sup>3</sup>https://www.ofgem.gov.uk/sites/default/files/docs/2021/02/final\_determination\_nget\_

<sup>&</sup>lt;u>annex revised.pdf</u> (Table 12: Areas covered by the MSIP re-opener)

<sup>&</sup>lt;sup>4</sup> LT466 South West Harmonic Filter - SSEN Transmission (ssen-transmission.co.uk)

that there is insufficient clarity over project need, optimal solutions, timing, and and/or efficient costs to align with:

- the fixed business planning timeframes of a periodic price control (such as RIIO-ET2) and
- the fixed submission window provided for in the licence.

Uncertainty can have a disproportionately adverse impact on development activity and work deemed necessary by ETOs to deliver a connection in a timely manner. Delays to work to progress the connection of low carbon generation, which would contribute towards meeting the Net Zero target, may lead to additional costs for GB consumers or adversely affect GB's ability to meet its targets.

- 1.10 As mentioned above, the MSIP re-opener<sup>5</sup> has been designed to allow ETOs to submit applications when there is more certainty over both project needs and costs. Initial needs case submissions seek a decision in principle for the initial needs case and preferred option ahead of the full application and cost assessment.
- 1.11 We have not determined the efficient costs of the relevant projects at this stage because the costs provided are only indicative. Efficient costs will be determined following our review of the full application when there will be sufficient information to allow us to assess the final needs case, project costs, associated outputs, and delivery dates. The licensee's full application must include all the information and evidence as set out in Chapter 3 of the Reopener Guidance<sup>6</sup>.
- 1.12 It should be noted that although we accepted and assessed some initial needs case submissions during the 2022 and 2023 MSIP submission windows, we expect that future MSIP submissions will include all the information necessary for us to assess both the need for a project and the efficient costs together.

<sup>&</sup>lt;sup>5</sup> Further details can be found in the MSIP licence condition (<u>Statutory consultation on</u> modifications to the RIIO-2 Transmission, Gas Distribution and Electricity System Operator licence conditions | Ofgem) and in Final Determinations (<u>RIIO-2 Final Determinations - Core Document</u> (<u>REVISED</u>) (ofgem.gov.uk)

<sup>&</sup>lt;sup>6</sup> Re-opener Guidance and Application Requirements Document (Version 3), 3<sup>rd</sup> April 2023: <u>https://www.ofgem.gov.uk/publications/re-opener-guidance-and-application-requirements-document-version-3</u>

#### What are we consulting on?

- 1.13 The MSIP licence condition<sup>7</sup> provides for licensees to make re-opener applications during the RIIO-2 price control period for projects planned to deliver 11 activities as specified in SpC 3.14.6.<sup>8</sup> SHET considers that the project relates to one or more of the specified activities and we agree. SHET's submission provides evidence that it considers sufficiently demonstrates a need for the projects, and for its initial preferred option, during RIIO-ET2.
- 1.14 SHET expects to submit the full applications for the project in the 2024 re-opener window. However, ahead of the full applications it has submitted the initial needs case and preferred option. We are consulting on our assessment of the initial needs case and an initial preferred option for further study.

#### **Context and related publications**

- 1.15 The scope of this consultation is limited to SHET's initial needs case MSIP submission for Southwest Harmonic Filter project. Additional information on this MSIP can be found in the MSIP re-opener submission document<sup>9</sup> on SHET's website.
- 1.16 This document is intended to be read alongside:
  - 1) RIIO-ET2 Re-opener Guidance and Application Requirements Document<sup>10</sup>
  - 2) SpC 3.14 of the Licence.<sup>11</sup>

#### **Consultation stages**

1.17 This consultation will open on 15 September2023 and close on 13 October 2023.We will review, fully consider, and publish the responses a few weeks after the consultation closes. We will endeavour to publish our decision by autumn 2023.

<sup>&</sup>lt;sup>7</sup> SPT Special Licence Conditions can be found in Licence Conditions – Zip File accessible at: <u>Statutory consultation on modifications to the RIIO-2 Transmission, Gas Distribution and Electricity</u> <u>System Operator licence conditions | Ofgem</u>

<sup>&</sup>lt;sup>8</sup> The MSIP activities under SpC 3.14.6 are listed in Appendix 1 for reference.

<sup>&</sup>lt;sup>9</sup> LT466 South West Harmonic Filter - SSEN Transmission (ssen-transmission.co.uk) <sup>10</sup> https://www.ofgem.gov.uk/sites/default/files/2023-

<sup>03/</sup>Reopener%20Guidance%20and%20Application%20Requirements%20Version%203.pdf <sup>11</sup> <u>https://www.ofgem.gov.uk/publications/decision-proposed-modifications-riio-2-transmission-gas-distribution-and-electricity-system-operator-licence-conditions-1-april-2022</u>

#### Figure 1: Consultation stages

Stage 1	Stage 2	Stage 3	Stage 4
Consultation open	Consultation closes (awaiting decision). Deadline for responses	Responses reviewed and published	Consultation decision/policy statement
18/09/2023	16/10/2023	autumn 2023	late 2023

#### How to respond

- 1.18 We want to hear from anyone interested in this consultation. Please send your response to the person or team named on this document's front page.
- 1.19 We've asked for your feedback on each of the questions throughout. Please respond to each one as fully as you can.
- 1.20 We will publish non-confidential responses on our website at <a href="http://www.ofgem.gov.uk/consultations">www.ofgem.gov.uk/consultations</a>.

#### Your response, data and confidentiality

- 1.21 You can ask us to keep your response, or parts of your response, confidential. We'll respect this, subject to obligations to disclose information, for example, under the Freedom of Information Act 2000, the Environmental Information Regulations 2004, statutory directions, court orders, government regulations or where you give us explicit permission to disclose. If you do want us to keep your response confidential, please clearly mark this on your response and explain why.
- 1.22 If you wish us to keep part of your response confidential, please clearly mark those parts of your response that you *do* wish to be kept confidential and those that you *do not* wish to be kept confidential. Please put the confidential material in a separate appendix to your response. If necessary, we'll get in touch with you to discuss which parts of the information in your response should be kept confidential, and which can be published. We might ask for reasons why.
- 1.23 If the information you give in your response contains personal data under the General Data Protection Regulation (Regulation (EU) 2016/679) as retained in domestic law following the UK's withdrawal from the European Union ("UK GDPR"), the Authority will be the data controller for the purposes of GDPR. Ofgem uses the information in responses in performing its statutory functions and in

accordance with section 105 of the Utilities Act 2000. Please refer to our Privacy Notice on consultations, see Appendix 4.

1.24 If you wish to respond confidentially, we'll keep your response itself confidential, but we will publish the number (but not the names) of confidential responses we receive. We won't link responses to respondents if we publish a summary of responses, and we will evaluate each response on its own merits without undermining your right to confidentiality.

#### **General feedback**

- 1.25 We believe that consultation is at the heart of good policy development. We welcome any comments about how we've run this consultation. We'd also like to get your answers to these questions:
  - 1. Do you have any comments about the overall process of this consultation?
  - 2. Do you have any comments about its tone and content?
  - 3. Was it easy to read and understand or could it have been better written?
  - 4. Were its conclusions balanced?
  - 5. Did it make reasoned recommendations for improvement?
  - 6. Any further comments?

Please send any general feedback comments to <a href="mailto:stakeholders@ofgem.gov.uk">stakeholders@ofgem.gov.uk</a>

#### How to track the progress of the consultation

You can track the progress of a consultation from upcoming to decision status using the `notify me' function on a consultation page when published on our website.

Ofgem.gov.uk/consultations



Would you like to be kept up to date with <i>[Consultation title]</i> ? subscribe to notifications: Email*		×
Email'		
	Email'	

Once subscribed to the notifications for a particular consultation, you will receive an email to notify you when it has changed status. Our consultation stages are:

**Upcoming** > **Open** > **Closed** (awaiting decision) > **Closed** (with decision)

# 2. Southwest Harmonic Filter project

#### Questions

- Q1. Do you agree with our initial view on the initial needs case for the Southwest Harmonic Filter project?
- Q2. Do you agree with our initial view on the preferred option presented by SHET?
- 2.1 In recent years, power quality issues have been monitored by SHET in the southwest (Kintyre Peninsula) region of its transmission licence area. The southwest region is located geographically within Argyll and extends southwards towards Carradale 132kV substation.
- 2.2 The issues have manifested in voltage distortions at Crossaig Substation. The disturbances remain above the planning threshold for the system and show no trend towards resolution without physical intervention in the network.

Figure 2: Southwest Region Map Branxton 400 kV 21-bay option (proposed option) layout – single line diagram



#### SHET's initial needs case submission

- 2.3 SHET advised that the purpose of this project is to facilitate installation of a harmonic filter to maintain the power quality in the southwest (Kintyre Peninsula) region of the SHET transmission licence area.
- 2.4 One element of power quality is harmonics which are components superimposed on the fundamental frequency supply voltage waveform with frequencies at integer multiples of the fundamental frequency (typically third and fifth harmonic orders). Harmonics are voltage distortions which can lead to a wide variety of issues including the overheating of assets and interference leading to the malfunctioning of equipment. A metric to monitor harmonic levels is detailed in Engineering Recommendation (EREC) G5/5<sup>12</sup>, which also sets acceptable levels of harmonic distortions for the operation of transmission network. Electricity Transmission Owners (ETOs) must ensure that harmonic distortions do not exceed the acceptable levels.
- 2.5 SHET explained that unusually elevated levels of harmonic distortion at the fifth harmonic order were observed in the southwest region, Kintyre Peninsula at Crossaig substation (See figure 2 above). Although it is difficult to make quantitative projections of future growth in harmonic distortion due to the complex nature of the phenomena, the expected increase in generation connections in the region have the potential to incrementally add to local harmonic distortion. Taking no action to develop a comprehensive mitigation measure would expose the system and its users to risks.
- 2.6 SHET is obligated to ensure that the power quality on the system remains within acceptable and manageable levels.

#### Our initial view of the initial needs case

- 2.7 Our initial view is that the initial needs case put forward by SHET is valid.
- 2.8 We have made this initial assessment for the following reasons:
  - SHET, as an ETO, is obligated to ensure that the power quality on the system including (but not limited to) the deviation of voltage, frequency, and

<sup>&</sup>lt;sup>12</sup> Engineering Recommendation G5, Issue 5, "Harmonic voltage distortion and the connection of harmonic sources and/or resonant plant to transmission systems and distribution networks in the United Kingdom", 2020.

waveform of a power system from the established, standard values – is kept under control and remains within acceptable and manageable levels.

- Results of a series of system tests undertaken show that the background fifth harmonic in the SPT area at Hunterston is being amplified over the Kintyre-Hunterston High Voltage Alternating Current (HVAC) link into the southwest region of SHET's network.
- Installation of harmonic filters to resolve harmonic issues is common practice where major power cables are installed as it is not feasible to change the design of the cable system (without incurring significant cost and consenting challenges). The mitigation of the harmonic issues in the southwest region must address the impact of the physical characteristics of the cable if the solution is to be enduring and independent of other wider system constraints.

#### Assessment of options and justification for the preferred option

- 2.9 To address the needs case drivers discussed above, SHET has considered the following four options:
  - 1) Do nothing
  - 2) Delay investment to the next price control period
  - 3) Operational mitigation using current Hunterston HVDC Converter Filters
  - 4) Installation of new harmonic filter in the southwest region of SHET transmission network
- 2.10 We have undertaken a technical review of the solutions considered by SHET. The materials we reviewed comprised of SHET's initial submission under SpC 3.14 of the Licence and responses to supplementary questions.

#### **OPTION 1:** Do nothing

- 2.11 SHET rejected this option because it will not resolve the problem. This option will likely start to impact on customer equipment negatively. Therefore this option does not meet the needs case.
- 2.12 We agree with SHET's rationale for rejecting this option as doing nothing would not address the observed harmonic distortion.

#### **OPTION 2:** Delay investment to the next price control period

- 2.13 SHET rejected this option as delaying the installation of a harmonic filter would potentially expose the system to medium term risks. The difficulty in forecasting increases in harmonics makes this approach difficult to justify.
- 2.14 We agree with SHET's consideration and rationale for rejecting this option.

### **OPTION 3:** Operational mitigation using current Hunterston HVDC Converter Filters (currently in use)

- 2.15 SHET rejected this option as a long-term solution, as it is not comprehensive, cannot be relied upon and will incur a degree of operational costs. However, this method is currently in use.
- 2.16 We agree with SHET's rationale for rejecting this option. While this may mitigate the problem at the moment, we consider that it is not a long-term and enduring solution for the problem.

# **OPTION 4: Installation of new harmonic filter in the southwest region of SHET Transmission network (current preferred option for further study)**

- 2.17 This option was selected as installation of a harmonic filter in the region is the only enduring and technically feasible solution available to address the issues of observed harmonic distortion.
- 2.18 We agree with SHET's rationale for selecting this option as the preferred and only enduring option. We expect detailed filter design studies will be conducted, including but not limited to the possible location options listed below:
  - Crossaig 132kV substation
  - Carradale 132kV substation
  - Crossaig 33kV substation (tertiary winding connection)
  - Crossaig North 33 kV substation
- 2.19 Subject to further optioneering on the locations listed above, we expect SHET to select the most economic and effective option and to submit the detailed optioneering and cost information to us when it becomes available.

#### **Our draft determination**

- 2.20 We are satisfied that there is a needs case for the Southwest Harmonic Filter project, that SHET has considered all viable options and that it has correctly rejected all options but one for further study.
- 2.21 We are therefore proposing to provisionally accept the initial needs case for the Southwest Harmonic Filter project and the preferred option presented by SHET in addressing this needs case, subject to the final needs case and cost assessment information being submitted and assessed by us. We require further study on optioneering to be presented by SHET in the full application of this project, together with detailed cost information.

## 3. Conclusion and next steps

#### **Next steps**

- 3.1 We welcome your responses to this consultation, both generally, and in particular on the specific questions from Chapter 2. Please send your response to: <u>Eliska.Antosova@ofgem.gov.uk</u>. The deadline for response is 16 October 2023.
- 3.2 We will carefully consider all consultation responses and endeavour to conclude our assessment of the SHET's MSIP initial needs case submission for the project with a provisional decision in autumn 2023. If our view does not move away from the draft determination, our provisional decision will confirm that SHET should be funded for the efficient delivery of the project, subject to receipt of appropriate evidence regarding the project delivery and the associated costs.
- 3.3 Once the full application including further study on optioneering and project cost with associated outputs, delivery dates and allowances to be detailed as PCDs are submitted in January 2024, we will assess and consult on the final needs case and efficiency of the proposed costs accordingly.

# Appendices

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# Appendix 1 – List of Activities under MSIP re-opener

The activities under MSIP re-opener are stipulated in SpC 3.14.6 and are listed below for reference.

- (a) a Generation Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.11 (Generation Connections volume driver);
- (b) a Demand Connection project, including all infrastructure related to that project, the forecast costs of which are at least £4.24m more or less than the level that could be provided for under Special Condition 3.12 (Demand Connection volume driver);
- (c) a Boundary Reinforcement Project that has received a NOA Proceed Signal in the most recent NOA;
- (d) a Flooding Defence Project, the purpose of which is to follow:
  - i. updates to the Energy Networks Association's report titled 'Engineering Technical Report (ETR138)' guidance on flooding; or
  - ii. a request from government, or a body which has responsibility for flood prevention, to protect sites from flooding;
- (e) an Electricity System Restoration Project following the establishment of an Electricity System Restoration Standard;
- (f) a system operability or constraint management project that has been requested by the System Operator;
- (g) projects that are needed in order to meet NETS SQSS requirements regarding security, or system operability;
- (h) Harmonic Filtering projects that are needed following:
  - i. requests from the licensee's customers to aggregate and deliver Harmonic Filtering requirements; or
  - system studies by the System Operator or the licensee showing a need for additional Harmonic Filtering on the National Electricity Transmission System;
- (i) protection projects that are needed following:
  - i. system studies by the System Operator or the licensee showing a need for changes to the protection settings or replacement of protection relay with inadequate range;
  - ii. system studies by the System Operator or the licensee showing a need for dynamic line ratings; or
  - iii. system studies by the System Operator or the licensee showing a need for an operational intertrip;
- (j) data transformation and improvement projects, to implement recommendations regarding specific outputs required to meet principles developed by industry data working groups; and
- (k) SF6 asset interventions, where the licensee can demonstrate a well-justified SF6 Intervention Plan.

# **Appendix 2 – Consultation Questions**

#### **Southwest Harmonic Filter project**

- Q1. Do you agree with our initial view on the needs case for the Southwest Harmonic Filter project?
- Q2. Do you agree with our initial view on the preferred option presented by SHET?

# **Appendix 3 – Privacy notice on consultations**

#### Personal data

The following explains your rights and gives you the information you are entitled to under the General Data Protection Regulation (GDPR).

Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.

# 1. The identity of the controller and contact details of our Data Protection Officer

The Gas and Electricity Markets Authority is the controller, (for ease of reference, "Ofgem"). The Data Protection Officer can be contacted at <u>dpo@ofgem.gov.uk</u>

#### 2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

#### 3. Our legal basis for processing your personal data

As a public authority, the GDPR makes provision for Ofgem to process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

#### 4. With whom we will be sharing your personal data

No external agencies.

# 5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for six months after the consultation is closed.

#### 6. Your rights

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right to:

- know how we use your personal data
- access your personal data
- have personal data corrected if it is inaccurate or incomplete
- ask us to delete personal data when we no longer need it
- ask us to restrict how we process your data

- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us if we can share your information with 3<sup>rd</sup> parties
- tell us your preferred frequency, content and format of our communications with you
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <a href="https://ico.org.uk/">https://ico.org.uk/</a>, or telephone 0303 123 1113.

#### 7. Your personal data will not be sent overseas.

#### 8. Your personal data will not be used for any automated decision making.

#### 9. Your personal data will be stored in a secure government IT system.

#### **10.** More information

For more information on how Ofgem processes your data, click on the link to our "ofgem privacy promise".