

Mathew Chandy  
Ofgem

12<sup>th</sup> February 2024

**Consultation on NGT's DSR Licence Condition**

Dear Mathew,

Thank you for the opportunity to respond to your initial proposals to modify the DSR provisions in the NGT Licence. Our responses to each of the consultation questions are attached.

If you have any queries in relation to this letter, please contact me.

Regards

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1. Do you agree with our view that references to DSR trials can be removed? If not, please explain your reasoning.

Yes. A trial was appropriate to facilitate learning when DSR arrangements were first developed but the reference is no longer needed in our view because further DSR trials are not envisaged.

2. Do you agree with our proposal to amend the title of Special Condition 9.22 to our suggested wording? If not, please explain your reasoning.

Yes.

3. Do you agree with our proposal to remove the areas of duplication in the Licence with the UNC? If not, please explain your reasoning.

Yes.

4. Do you agree with our proposed new definitions for DSR? If not, what changes or clarifications would you suggest?

Yes.

5. Do these new definitions make it clear which type of DSR is being referred to throughout this Licence condition? If not, please explain your reasoning.

Yes. We think that the proposed amendments to the definitions of 'Demand Side Response' and 'Demand Side Response Offer' in the Licence are suitably worded to enable their application to either 'Shipper DSR' or 'Consumer DSR' in Special Condition 9.22.

6. Do you agree with our approach to refer to the UNC in parts of the Licence condition to enable future-proofing? If not, please explain your reasoning.

Yes. Following the implementation of significant changes to the operation of the DSR regime in the UNC, and with the prospect of further changes to come, we agree that it is appropriate for the Licence to be drafted at a high level and refer to the UNC which contains the detail.

7. Are there any other drafting amendments or additions you want us to consider for this specific Licence condition in order to aid clarity?

No.