

Future System Operation
Office of Gas and Electricity Markets
10 South Colonnade
Canary Wharf
London
E14 4PU

19 January 2024

Dear Future System Operation team,

SSEN Transmission response to Future System Operator - Draft amendments to other impacted licences

This response is prepared on behalf of SSEN Transmission¹, part of the SSE Group, responsible for the electricity transmission network in the north of Scotland.

A successful transition from ESO to FSO is of fundamental importance to the delivery of net zero. It is crucial that in delivering the FSO that the consequential impacts on all licence holders are identified, consulted on, and well understood by the affected parties ahead of FSO Day 1 launch. We therefore welcome the opportunity to review and respond to the current proposed draft amendments.

At this stage, we do not have any concerns with the draft amendments raised on the Electricity Transmission Standard Licence Conditions and Scottish TO Special Licence Conditions. The introduction of new roles and responsibilities for the FSO however will ultimately have a consequential impact on our own licence obligations beyond what has been identified within this consultation document.

For example, the current consultation does not cover any amendments to our licences as a result of the introduction of the Centralised Strategic Network Plan (CSNP) or onshore electricity network competition and our expectation is that more material changes will be required to our licences to fully implement these activities. We would therefore welcome confirmation and publication from Ofgem on the expected timescales for engagement and consultation on the further amendments required to both the FSO and TO licences to establish these new roles.

We look forward to continuing engagement with Ofgem on this topic as we approach FSO Day 1. If you wish to discuss any part of our response further, please do not hesitate to get in touch.

Yours sincerely,

Cara Dalziel

Senior Regulation Analyst

¹ Following a minority stake sale which completed in November 2022, SSEN Transmission is now owned 75% by SSE plc and 25% by Ontario Teachers' Pension Plan Board. SSEN Transmission encompasses the licenced entity Scottish Hydro Electric Transmission Plc Registered in Scotland No. SC213461
Scottish and Southern Electricity Networks is a trading name of: Scottish and Southern Energy Power Distribution Limited Registered in Scotland No. SC213459; Scottish Hydro Electric Transmission plc Registered in Scotland No. SC213461; Scottish Hydro Electric Power Distribution plc Registered in Scotland No. SC213460; (all having their Registered Offices at Inveralmond House 200 Dunkeld Road Perth PH1 3AQ); and Southern Electric Power Distribution plc Registered in England & Wales No. 04094290 having their Registered Office at No.1 Forbury Place, 43 Forbury Road, Reading, RG1 3JH which are members of the SSE Group www.ssen.co.uk