



## Response by Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc to the non-statutory consultation on the draft amendments to other impacted licences once the Secretary of State designates and grants licences to the Future System Operator

### KEY POINTS

- Our comments are in the attached spreadsheet that follows the form of the usual Ofgem issues log.
- Ofgem should also review the relevant Associated Documents and the Regulatory Instructions and Guidance Documents and propose appropriate changes to those documents, for example to recognise the role of “the ISOP”, as opposed to the Electricity System Operator, and update references to National Grid.

*Comments on the proposed changes to the special and standard conditions of the electricity distribution licence.*

**1. Have we correctly identified the impacts of the FSO licence proposals on other licences?**

We do not have any comments regarding the impacts of the FSO licence proposals on other licences on the basis of the information that is available currently.

**2. Are you aware of any further amendments that may be required to other licences?**

Please see the drafting comments we have made in the attached spreadsheet that follows the form of the usual Ofgem issues log.

**3. Do you have any other comments?**

As Special Condition 5.2 RIIO-2 network innovation allowance, Special Condition 5.3 Carry-over Network Innovation Allowance, Special Condition 7.10 RIIO-ED1 network innovation competition (in the Scottish Hydro Electric Power Distribution plc electricity distribution licence but Special Condition 7.9 in the electricity distribution licences held by Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc) and Special Condition 9.9 The strategic innovation fund now include references to “the ISOP”, Ofgem should also review the relevant Associated Documents and the Regulatory Instructions and Guidance Documents and propose appropriate changes to those documents, for example to recognise the role of “the ISOP”, as opposed to the Electricity System Operator, and update references to National Grid, National Grid Company, NGC, NGET etc.