

Registered Office:
Newington House
237 Southwark Bridge Road
London SE1 6NP

Company:
UK Power Networks
(Operations) Limited



Registered in England and Wales No: 3870728

Future System Operation Team
Ofgem
10 South Colonnade
Canary Wharf
London
E14 4PU

By email only to: FSO@ofgem.gov.uk

19 January 2024

Dear Future System Operation Team,

Response to Future System Operator – Draft amendments to other impacted licences consultation

Thank you for the opportunity to respond to the above consultation dated 14 December 2023. This response is on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. We are Great Britain's largest electricity Distribution Network Operator (DNO), dedicated to delivering a safe, secure and sustainable electricity supply to 8.5 million homes and businesses.

Please see below for our responses to your consultation questions.

Q1. Have we correctly identified the impacts of the FSO licence proposals on other licences?

We believe you have correctly identified the licences impacted by the establishment of the FSO licences. Having reviewed the marked up changes to the Electricity Distribution Standard Licence Conditions (SLCs) and Electricity Distribution Special Conditions (SpCs) as a result of the FSO licence proposals, we believe you have identified the required changes to these licence documents. We note the proposed changes do not result in any material change to the obligations within these documents, only updates to references and definitions.

Q2. Are you aware of any further amendments that may be required to other licences?

We are not aware of any further amendments required for the Electricity Distribution Standard Licence Conditions (SLCs) and Electricity Distribution Special Conditions (SpCs). However, we note that changes will also be required to wider industry code documents for example the Distribution Connection and Use of System Agreement, DCUSA, will need references to National Electricity Transmission System Operator updated to reflect new definitions. The requirement to make these changes is noted in your consultation but we would welcome further discussion on the plan to ensure all industry code documents are updated in a coordinated way on a timescale reflective of the FSO being established.



Q3. Do you have any other comments?

None at this stage.

If you have any questions, please do not hesitate to get in touch with me in the first instance.

Yours sincerely,

James Hope

Head of Regulation and Regulatory Finance

