

# Consultation

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## Statutory Consultation on Addition of Section F within Generation Licence for clarity on Network Service Assets

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We are consulting on conditions within the Generation Licence which could impact on the suitability of the licence for assets dedicated to providing network services. We would like views from people with an interest in Generation Licences and / or how network services are provided to the system operator. We particularly welcome responses from providers or potential providers of network services without the need for consequent energy provision, as well as existing holders of Generation or Network Licences. We would also welcome responses from other stakeholders and the public.

This document outlines the scope, purpose and questions of the consultation and 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 [ofgem.gov.uk/consultations](https://www.ofgem.gov.uk/consultations). 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.

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## 1. Introduction

### Section summary

This section sets out the scope and purpose of the proposals being consulted on. It further provides the broader context which drives the proposed modifications.

Finally, this section includes the key information on how to respond to this consultation.

### Scope

- 1.1 This Statutory Consultation relates to inclusion within the Generation Licence of certain definitions and licence conditions relevant to operation of assets which provide network services (such as system stability and reactive power) with the need to simultaneously trade megawatt output.

### Purpose

- 1.2 The purpose of this Statutory Consultation is to set out our<sup>1</sup> proposed wording for inclusion within the licence, having taken account of views provided by industry through our initial consultation on this topic.
- 1.3 This Statutory Consultation provides a further opportunity for stakeholders to comment on a more developed set of proposals.

### Context and related publications

- 1.4 We are proposing this modification to the Generation Licence to provide clarity for certain types of asset (assets dedicated to providing network services) which are otherwise already eligible for a Licence.
- 1.5 The need for this clarity arises due to the pace of progress within the electricity industry, and the types of asset and provider which engage in providing services to the system.
- 1.6 In Great Britain, the Electricity System Operator ("ESO") has identified that bespoke procurement of network services<sup>2</sup> such as stability and reactive

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<sup>1</sup> The terms "we", "us", "our", "Ofgem" and "the Authority" are used interchangeably in this document and refer to the Gas and Electricity Markets Authority. Ofgem is the office of the Authority.

<sup>2</sup> To date, ESO procurement of network services has been through ad-hoc events previously known as Pathfinders, known since 1 April 2023 as Network Services Procurement. The longer term ambition is for this to occur via regular market activities. More information on ESO's network services procurement can be found at: <https://www.nationalgrideso.com/industry-information/balancing-services/pathfinders>

power can reduce costs to the end consumer while enabling secure and reliable system operation of a zero carbon system.

1.7 We set out an interim position on the treatment of Synchronous Condensers<sup>3</sup> which clarified that for assets which store energy to provide a network service we will consider granting generation licences, subject to our usual assessment procedures.<sup>4</sup> This approach remains under review, and any change to this stance would be communicated to industry on conclusion of our review.

a) Our published letter on this position can be found at:

<https://www.ofgem.gov.uk/publications/review-regulatory-framework-ancillary-service-assets-and-clarification-our-short-term-treatment-synchronous-condensers>

1.8 Our stance is that the position set out in paragraph 1.7 is technology-neutral – that is, it stands for any asset which meets the necessary criteria, not only synchronous condensers.

1.9 To provide the extra clarity needed during this interim period, we consulted on including additional conditions within the Generation Licence.

a) Within this Statutory Consultation, we refer to the earlier consultation as the “initial consultation”.

b) The initial consultation is available, with published responses received, at:

<https://www.ofgem.gov.uk/publications/consultation-suitability-electricity-generation-licence-assets-dedicated-providing-network-services>

1.10 We are now conducting this Statutory Consultation to seek final industry views on our position, following incorporation of views provided by industry to the initial consultation.

## **Consultation stages**

1.11 An initial consultation was conducted from 8 February 2024 to 11 March 2024.

1.12 This Statutory Consultation will run from 26 April 2024 to 27 May 2024.

1.13 We will account for any views raised during this Statutory Consultation period, but should we decide to proceed with this modification we will issue a decision to do so which carries a 56-day implementation period.

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<sup>3</sup> Also known as Synchronous Compensators.

<sup>4</sup> Please see: <https://www.ofgem.gov.uk/industry-licensing/how-become-licensed-gas-or-electricity-company>

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## How to respond

- 1.14 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.
- 1.15 We have asked for your feedback on specific questions throughout. Please respond to each one as fully as you can.
- 1.16 We will publish non-confidential responses on our website at [www.ofgem.gov.uk/consultations](http://www.ofgem.gov.uk/consultations).

## Your response, data and confidentiality

- 1.17 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.
- 1.18 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.
- 1.19 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 Gas and Electricity Markets 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.
- 1.20 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.

- 1.21 Respondents should be aware that we may choose not to consider responses which do not deal with the subject matter of this consultation and may choose not to publish responses which include inappropriate language such as profanity.

#### General feedback

1.16. 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 [stakeholders@ofgem.gov.uk](mailto:stakeholders@ofgem.gov.uk)

### **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.

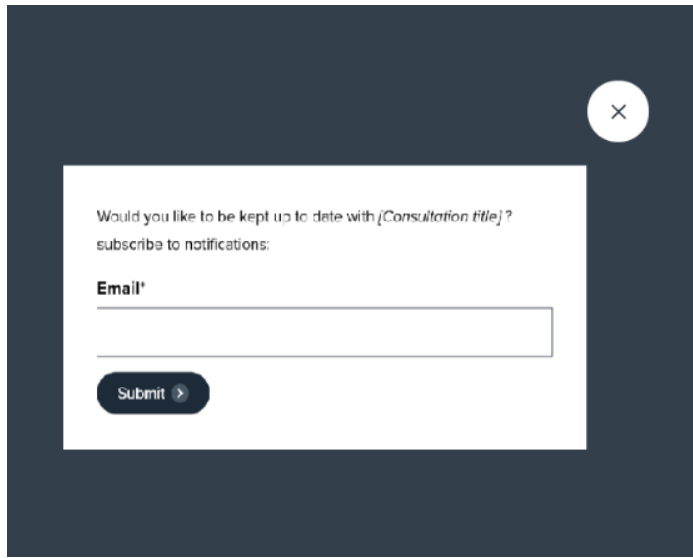
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The image shows a dark blue modal window with a white close button (an 'X' in a circle) in the top right corner. Inside the modal is a white form area. The text in the form reads: "Would you like to be kept up to date with [Consultation title]?" followed by "subscribe to notifications:". Below this is a label "Email:" and a text input field. At the bottom left of the form is a dark blue button with the text "Submit" and a right-pointing arrow.

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. Assessment of Responses to our Initial Consultation**

### **Section summary**

This section outlines our assessment of the responses we received to our first consultation. We asked nine questions across three sections in that consultation, and we received six responses in all.

The feedback from the responses was generally positive with respect to our initial proposal. We have looked to refine our proposal based on the feedback we received.

### **Responses summary**

- 2.1 We are grateful to all parties who took the time to respond to our initial consultation. We received responses from:
- c) The Carbon Trust;
  - d) Matt Kirk;
  - e) National Grid ESO;
  - f) Orsted;
  - g) Transmission Investment; and
  - h) Welsh Power.
- 2.2 We have analysed each of the responses and provide a summary of views below. Some respondents provided narrative responses, and so we have applied our judgement where possible to align these responses to the specific questions / sections of our initial consultation.

### **Matt Kirk's response**

- 2.3 We received a response from Matt Kirk as a member of the public.
- 2.4 We do not consider that the response included information relevant to the questions specifically under consideration in our initial consultation.
- a) Therefore, when discussing responses to our consultation questions below, we have excluded this response.
  - b) Hence, terms such as "all parties" forthwith in this document would be in reference to the other five responses only.
- 2.5 We do consider that this response appears to raise questions over Ofgem's ability to deliver this proposed change. We anticipate that publication of this

follow on Statutory Consultation, and the next steps shown in Section 4 will alleviate this concern.

- 2.6 We also recognise that the response highlighted concerns in other areas of Ofgem’s work, and these have been noted for further consideration where relevant.

## **Response to questions around our proposed definitions and terminology**

### **General sentiment**

- 2.7 From the responses provided, we consider that the general sentiment is of support for our intention to include definitions relevant for assets dedicated to providing network services.
- 2.8 We reiterate that the inclusion of the definition would not impact the criteria or process for applying for or being granted a licence. The definition would only have an impact where it applies to an asset following a licence being granted on the current grounds. This was mentioned in responses as important, particularly by National Grid ESO.

### **Responses to Q1 – need for a definition**

- 2.9 All parties agreed, at least as an interim measure while we continue a review of treatment of network service providing assets, that a definition within the Generation Licence was beneficial.
- 2.10 There is a general acknowledgement that the electricity system is changing at pace, with new technologies entering and offering services in ways that did not exist previously. There is also recognition that this is necessary for reducing end consumer costs and achieving net zero ambitions. Responses indicate that providing a definition within the Generation Licence for assets dedicated to network service provision would help set a level playing field in the near term.

### **Responses to Q2 – scope of assets within definition**

- 2.11 All parties agreed with our position that the definition should avoid being specific to an asset type, but rather to focus on the dedicated provision of network services (ie network services delivery at zero megawatt output).

- 2.12 Several respondents noted technology types that should be captured by any definition introduced, beyond the synchronous condensers considered in our October 2021 letter.
- 2.13 In particular, The Carbon Trust noted that assets which have been augmented to provide services should be within scope.
- 2.14 Orsted also pointed to potential providers who could be acting as demand.

### **Responses to Q3 – agreement with our proposed definition**

- 2.15 Our proposal to use the term “network services” rather than “ancillary services” was supported explicitly by four of the respondents and implicitly by the fifth.
- 2.16 The main contention in responses was around the proposal to limit the definition to assets with “long term” contracts.<sup>5</sup>
  - a) National Grid ESO oppose any minimum time criteria, stating that this presents a barrier to market development.
  - b) Orsted also indicated that having the time criteria in place needed further explanation.
  - c) The Carbon Trust made clear that a tight definition of what constitutes a long term contract would be needed, particularly in view of the ESO’s procurement of these services still being through either nascent markets or planned from markets currently under development.
- 2.17 Feedback from respondents around the types of service captured under “network services” was generally supportive. However, there were some additional suggestions:
  - a) National Grid ESO suggested that “Short Circuit Level” might better be considered as “System Strength / Short Circuit Level”. They believe that this covers aspects of stability service offerings from grid forming technologies that might not otherwise be explicitly recognised under our proposed definition in the initial consultation.

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<sup>5</sup> We proposed that a “long term” contract would be a contract of period greater than one day.

b) Orsted provided a view that requiring that assets be 'dedicated to' provision of services could limit utilisation of certain asset classes (such as power-to-X converters).<sup>6</sup>

2.18 Transmission Investment suggested minor tweaks to the wording of our proposed definition (to include the word "network" before "services" in both points b) and c) of the definition of "assets dedicated to providing network services").

### **Responses to Q4 – additional network services to include within scope of definition**

2.19 Suggestions for additional network services were variously provided by respondents, as listed below:

- a) System restoration;
- b) Active harmonic filtering;
- c) Oscillation damping;
- d) Frequency response; and
- e) Grid forming capability (such as damping power and phase jump power).

2.20 For balance, one respondent indicated that our proposed list of services was appropriate and one respondent made no comment on this question.

### **Responses to Q5 – views on introducing new definitions through a new section of the Generation Licence**

2.21 Responses were favourable to this approach. Some respondents went further, adding that alternatives such as incorporating the definition through existing sections would likely be less effective and clear.

2.22 There was some clarification however from several respondents that this should be an interim position, and that a review of the licence or of licencing in general should be done and so acceptance of the addition of Section F should not be seen as the end of the process to facilitate improved access to the electricity system for assets of this nature.<sup>7</sup>

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<sup>6</sup> Power-to-X assets convert electrical power to a range of other products ("X"). The implication often is that the product(s) can be reconverted to electricity at a later time, thus providing a form of electrical storage.

<sup>7</sup> We note that we are reviewing the licencing approach for network services assets on a broader scale out with this consultation process.

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## **Responses to Q6 – any other views relevant to the definition proposals**

- 2.23 The only additional views came from National Grid ESO.
- 2.24 We take on board feedback around treatment of these assets across industry frameworks, and will apply this to our broader review work on this area. We agree that both Ofgem and industry as a whole should continue to work to have a consistent set of definitions across frameworks.
- 2.25 We also clarify here that while assets such as synchronous condensers or other assets providing network services at zero megawatt active power output can be eligible for a Generation Licence, they are not required to. We believe that this clarification answers the second point raised by National Grid ESO around interaction with Transmission Owner (TO) assets. We do accept that there is a significant question around the interaction between TO and commercial provided assets of this nature, which we intend to investigate further through our broader review work.

## **Response to questions around licence conditions within scope of Section F**

### **Responses to Q7 – should licence condition 14 be in scope**

- 2.26 Unanimous agreement that including a specific licence condition reflecting Standard Licence Condition 14 of Section B within the newly proposed Section F is appropriate. Responses indicate that:
- a) assets providing network services would be unable to access the Standard Licence Condition 14 powers given the 50MW restriction and that these assets are unlikely to be rated on a megawatt basis.
  - b) Assets providing network services can contribute concordant to large generators and this is a recognition of that importance.

### **Responses to Q8 – any further licence conditions which should be in scope**

- 2.27 Respondents did not indicate awareness of any other licence conditions which, at this time, should be reflected in the proposed Section F.

### **3. Our Position on Proposed Licence Drafting**

#### **Section summary**

Within this section, we set out our position for introducing Section F, with the proposed definitions and licence conditions.

We include here our rationale for the position on these proposed modification, based on our further policy development since the initial consultation, including the views expressed by respondents to that consultation as summarised above.

#### **Questions**

- Q1. Do you agree with inclusion via creation of new section within the licence?
- Q2. Do you agree with the proposed wording for inclusion of licence conditions F1 and F2?
- Q3. Do you have any other comments relevant to the scope of this proposed modification?

#### **Proposal for Section F and relevant licence conditions**

##### **Introduce Section F for assets dedicated to providing network services**

- 3.1 We consider that the best implementation method for this proposed modification is through the creation of a new section, Section F.
- 3.2 We recognise, as per consultation responses, that this is consistent with our approach for other technology types with specific conditions within the Generation Licence.
- 3.3 We also agree with respondents that this would be the clearest way to address the related issues, rather than by making amendments to Section B licence conditions which may become tortuous and less clear, especially for assets not meeting our proposed definition as dedicated to providing network services.
- 3.4 We also note the comment from National Grid ESO referring to ownership of assets dedicated to providing network services by Transmission Owners (TOs) which are licenced under Transmission Licences. For clarity, assets dedicated to providing network services are generally not obliged to hold a Generation

Licence, though they are able to apply for one.<sup>8</sup> Given the different regulatory treatment of assets owned by commercial providers (potentially under a Generation Licence) and by TOs, we do not see any impact of this proposed modification on TOs in terms of meeting their SQSS<sup>9</sup> requirements. We will keep this under review, including through our broader review of the correct regulatory treatment of assets dedicated to providing network services.

- 3.5 We therefore propose to introduce "Section F: Supplementary Conditions for Assets Dedicated to Network Service Provision".

### **Licence conditions for inclusion in Section F**

- 3.6 Respondents agreed that the powers provided under Standard Licence Condition 14 of the Generation Licence should be mapped across to Section F.
- 3.7 No other licence conditions have been identified for inclusion under Section F at this time. We will keep this under review and continue to welcome industry views on the matter.
- 3.8 We therefore propose to include Licence Condition F2. Compulsory Acquisition of Land etc.

### **Proposal for text in definitions**

#### **Use of term "network service(s)"**

- 3.9 Network services as a term was favoured by respondents, achieving the right balance of breadth.
- 3.10 We propose to continue with the use of this terminology, making this definition distinct from other terms such as ancillary services (which is a broader capture).
- 3.11 We do not consider that our definition proposed here conflicts with other definitions in use.

#### **Definition of "network service(s)"**

- 3.12 We propose to retain essentially the definition of "network service(s)" proposed in our initial consultation.

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<sup>8</sup> Requiring, applying for, and being granted a licence are different. Granting of licences is subject to our usual processes.

<sup>9</sup> The SQSS is the System Quality and Security Standards and sets out the requirements on different parties in ensuring system quality and security.

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- 3.13 We received several suggestions of network services which could be included in that list (see paragraph 2.19), but we have determined that they do not merit inclusion at this point. We consider that these services do not require the specificity that this licence modification would provide, being either linked to megawatt output or assets which already fall under the definition for different services.
- 3.14 We confirm that, per the definition, an asset may be providing one or more of the services listed and the definition would apply equally.
- 3.15 We also note National Grid ESO's suggestion that "Short Circuit Level" could be better described as "System Strength / Short Circuit Level", with the explanation being that ESO procurement of System Strength has so far been described through Short Circuit Level rating but that there are many and varied interpretations of System Strength.<sup>10</sup> The view expressed by National Grid ESO is that use of the broader definition better indicates the network service.
- 3.16 We have considered this view, however, we are keen to include directly the services being procured and provided as this gives the most clarity to providers around which services are in and out of scope of the definition. Further, by using a more specific definition of how system strength is being provided allows for clarity on in-scope assets and
- 3.17 We accept that if National Grid ESO's procurement strategy for System Strength changed, this could date the definition used here. This is something we can keep under review, and also feed into our wider review work.
- 3.18 We welcome views through this Statutory Consultation period.

**Minor amendment to definition of "assets dedicated to providing network service(s)" in line with feedback from Transmission Investment**

- 3.19 Transmission Investment proposed that our definition here would benefit from including "network" before services in points (b) and (c) of the definition.
- 3.20 We agree that this aids with clarity and therefore propose to adopt this in our definition, noting that this does not alter the intended meaning of the position set out in the original definition from our initial consultation.

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<sup>10</sup> For example, Short Circuit Ratio.

- 3.21 We have made other minor changes in the text to aid clarity and brevity but without intent to change meaning from the version in our Initial Consultation.

**Consideration of breadth of asset types captured by definition of “assets dedicated to providing network service(s)”**

- 3.22 We reassert that the definition proposed is intended to be technology neutral, subject to being able to provide network services in a dedicated fashion. Our rationale for retaining this is that assets which do not do so are likely to have been captured in the original intent of the Generation Licence.
- 3.23 We note that several respondents mentioned that storage systems (including storage systems coupled with synchronous machines) can provide at least some of the services we set out within the definition of “network service(s)”.
- 3.24 Our intention of including these definitions is for it to apply to assets that are not trading megawatts at the time they are selling / providing network services. Where storage assets comply with this intent, per the definitions proposed, they would be captured. Where they don't, we are comfortable that storage is treated sufficiently within the Generation Licence already.
- 3.25 We note feedback from The Carbon Trust which reflects on other types of asset owners (ie Offshore TOs (OFTOs)). We consider this beyond the scope of this proposed modification but will consider this feedback as part of our broader review work on regulatory treatment of assets dedicated to providing network services.
- 3.26 Equally, we believe that assets The Carbon Trust refer to which have been augmented are either captured by the proposed definition already or are captured credibly under other sections of the licence and there is no need to expand the scope of the proposed definition.
- 3.27 Where Orsted highlighted that assets could be acting as demand, we are keen not to cause confusion or allow scope creep by broadening our proposed definition here beyond assets at zero megawatt output providing network services in a dedicated fashion. We will however consider the “third category” of provider Orsted mention within our broader review work.

### **Decision to retain “dedicated to” within the definition of “assets dedicated to providing network service(s)”**

- 3.28 Our view is that this definition should apply only to assets which are dedicated to providing network service(s) (that is to say, assets which do not need to trade megawatts simultaneous to providing network services).

### **Decision on contract duration within definition**

- 3.29 We originally proposed to restrict the definition to apply only to assets with a long term contract from the ESO.<sup>11</sup> Long term was proposed to be a contract with length more than one day.
- 3.30 Our intention in setting such a restriction was that it would reflect assets which are more likely to offer a contribution to the system accordant with the need for specific licence conditions.
- 3.31 We are not intending to proliferate or create abuse of the licencing regime through inclusion of this definition, and as already mentioned there is no change to the grounds for application for a licence as a result of including this definition.
- 3.32 However, some consultation responses indicated that this could be a barrier to effective competition.
- 3.33 We are mindful of this concern. However, we remain of the view that including a limit on the contract duration is proportionate at this stage.
- 3.34 Noting that the ESO is the procurement body for network services, we consider that a limitation on contract duration is easier to establish than a network service minimum contribution,<sup>12</sup> but works equivalently to the minimum megawatt contribution set elsewhere in the Generation Licence.

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<sup>11</sup> We refer to contracts awarded by the ‘system operator’ within our proposed definition. We note that on-going considerations of modification could lead to this term being replaced in future by “Independent System Operator and Planner” (“ISOP”). This is subject to a decision on our proposals currently under statutory consultation (available at: <https://www.ofgem.gov.uk/publications/national-energy-system-operator-neso-licences-and-other-impacted-licences-statutory-consultation>). Subject to decisions on those proposals and the proposals contained herein, and the timelines of implementation for these modifications, we consider that the relevant term may need to be changed. We consider this would not construe a change in the intention of this modification.

<sup>12</sup> Not least because this is complicated by there being multiple networks services, which can be delivered together or independently. Further complication arises because of the effectiveness of network services often varying locationally / with distance from need.

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- 3.35 We therefore propose to retain our original position that requiring a contract length greater than one day ensures that the Licence remains proportionate and effective and avoids any confusion.
- 3.36 We continue to seek views on this through this Statutory Consultation.

## **4. Conclusion and next steps**

### **Proposal**

- 4.1 We propose to include into the Generation Licence a new section, Section F, including:
- a) licence conditions;
  - b) definitions of:
    - (1) “assets dedicated to providing network service(s)”; and
    - (2) “network service(s)”.
- 4.2 The proposed text for inclusion is provided as an annex (Annex 1) to the Notice which accompanies this consultation, published on our website. This is the text which should be referred to when responding to our consultation questions.

### **Next steps**

- 4.3 This statutory consultation is open until 27 May 2024.
- 4.4 We will consider any further representations made based on this updated version accounting for views from our initial consultation.
- 4.5 If we decide it is appropriate to proceed with the licence change, we will publish a decision outlining our reasons for doing so accompanied with the final licence drafting. Any licence change will be subject to a 56-day statutory notice period. Depending on the substance of responses received, this sets an indicative potential implementation date in late summer 2024.

## Appendices

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## **Appendix 1 – 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 [dpo@ofgem.gov.uk](mailto:dpo@ofgem.gov.uk)

#### **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**

We do not expect to share personal data collected through this consultation with any other organisation.

#### **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 one year following closure of this consultation.

#### **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

**Consultation** - Statutory Consultation on Addition of Section F within Generation Licence for clarity on Network Service Assets

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- 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 <https://ico.org.uk/>, 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](#)".