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Response to the Statutory consultation on National Energy System Operator licences and other impacted licences¹

UK Power Distribution is a licenced independent electricity distribution network operator (IDNO).

We have reviewed the proposed changes to the Electricity Distribution Standard Licence Conditions (Annex O) and find them appropriate: they consist mainly in introducing the ISOP as an entity that the licensee should cooperate with.

We have also reviewed the Electricity System Operator Licence Conditions (Annex E), and have the following feedback:

- We note that it introduces the notion of a Distribution System Operator², without making any link to the Electricity Distribution Licence or the Electricity Act. Using established references to designate licenced distribution network operators, and/or “Private wire” networks, would instead tie the definition to an industry party that is clearly defined and understood, and hence avoid confusion.

¹ www.ofgem.gov.uk/publications/national-energy-system-operator-neso-licences-and-other-impacted-licences-statutory-consultation

² Condition A1, Definitions

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- We look forward to understanding the full scope of the Strategic Spatial Energy Plan, how it will be used, and how it may impact the investment opportunities for DNOs and IDNOs.

Finally, we stand ready to engage with the upcoming consultation on the role of Regional Energy Strategic Planner which will eventually be added to this licence.

Best regards,

Anne-Claire Leydier
Head of Regulation