



Response by Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc to the statutory consultation on the National Energy System Operator licences and amendments to other impacted licences

KEY POINTS

- We note that the versions of the Special and Standard Conditions of the electricity distribution licence, on which the statutory consultation has been carried out, are dated 13 October 2023 and 1 April 2023 respectively and that the Special and Standard Conditions of the electricity distribution licence were modified with effect from 9 April 2024. Consequently, the modifications as a result of this statutory consultation should be made to the Special and Standard Conditions of the electricity distribution licence that are in effect on the date on which the relevant modifications take effect.
- We have noted some minor drafting comments below.
- There are also a number of formatting issues in the versions of the Special and Standard Conditions of the electricity distribution licence, on which the statutory consultation has been carried out, that should not be replicated in the modified versions of those licence conditions.

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

1. Our minor drafting comments are:

Northern Powergrid (Northeast) plc Special Conditions:

In Special Condition 9.9.4, “licence” should be capitalised because “Electricity System Operator Licence” is a defined term.

Northern Powergrid (Yorkshire) plc:

In Special Condition 1.2, the second reference to “the ISOP” in the definition of “Distribution Network Voltage Control Services” should be deleted because it is a duplicate and “ISOP” should be deleted from the deleted definition of “GB System Operator”.

In Special Condition 9.9.4, “licence” should be capitalised because “Electricity System Operator Licence” is a defined term.

Standard Conditions:

In Standard Condition 1.3, the definition of “Transmission System” should be amended to read:

“Transmission System means those parts of the GB Transmission System that are owned or operated by a Transmission Licensee, within the transmission area specified in its Transmission Licence, or operated by the ISOP” because the ISOP will not hold a Transmission Licence.

2. There are a number of formatting issues in the versions of the Special and Standard Conditions of the electricity distribution licence, on which the statutory consultation has been carried out, that should not be replicated in the modified versions of those licence conditions, such as:

Northern Powergrid (Northeast) plc Special Conditions:

- Apparent page breaks in Special Condition 1.2 should be removed from in and/or after the definitions of “Complaint”, “Decision on SHEPD’s Contribution to the Shetland Transmission Link”, “ENA Smarter Networks Portal”, “Justified Under-Delivery”, “SIF Returned Project Revenues” and “Specified Street Works Costs”; and
- In various other Special Conditions, apparent pages breaks should be removed, hard returns are needed after paragraphs, indenting of text is needed in paragraphs.

Northern Powergrid (Yorkshire) plc Special Conditions:

- Apparent page breaks in Special Condition 1.2 should be removed from in and/or after the definitions of “Defaulting Electricity Supplier”, “Disapplication Date”, “ENA Smarter Networks Portal” and “Justified Under-Delivery”; and
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- Apparent pages breaks should be removed from paragraphs 3.2.3, 4.4.4, 4.4.8, 4.4.12, 5.2.3, 7.9.2, 9.9.2 and 9.9.10.

Standard Conditions:

Apparent hard returns should be removed from after the definitions of “Distribution Losses” and “Distribution Services Area” in Standard Condition 1.3.