

Future System Operation
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By email:

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Date

17th June 2024

Contact / Extension

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Dear Team,

Establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024

This consultation response is from SP Energy Networks, we welcome the opportunity to respond to Ofgem's policy consultation on establishing the ISOP in GB industry Codes. We support the methodology proposed by Ofgem to implement the necessary changes and to enable the establishment of the ISOP in accordance with its statutory functions, duties and licence conditions.

During our review of the proposed changes to the codes, we note the use of older versions of code documents, when we have recognised an issue, we have raised it with the relevant code administrator.

We would flag as an example of the issue: the System Operator Transmission Code (STC), Section C Transmission Services and Operations. The version contained within the consultation pack has the footer number 11 (change tracked from v10) and a date of TBC (was 25 April 2023), however, we note that the current version of Section C on the website is also Version 11 with a date of 04 March 2024. The same scenario occurs with STC Section D Planning Co-ordination, the consultation pack shows tracked changes from Version 12, dated 18 January 2024, yet the live version on the website is Version 13, dated 4 March 2024.

Given the work involved in the modification of codes and the frequent changes to adjust for authority decisions, we would urge the importance of ensuring all necessary changes to implement the establishment of the ISOP are made to the most up to date of all code documents.

We suggest there is a definite requirement prior to the updating of documents to ensure the latest version is used and the appropriate version numbers are updated to track changes made.

Please do not hesitate to contact me should you wish to discuss any of the points raised within this response.

Yours sincerely,



David Boyland

Head of Transmission Regulation & Policy