

Consultation name: Statutory consultation on modifications to industry codes to implement the Independent System Operator and Planner (ISOP)

Issued by: Ofgem

Territorial extent: Great Britain

Response author: SGN

Deadline for responding: 17th June 2024



SGN

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Via email to: FSO@ofgem.gov.uk

17th June 2024

Dear Kristian and Carly,

FSO Codes Change Programme – Statutory consultation on modifications to industry codes to implement the Independent System Operator and Planner (ISOP)

Thank you for the opportunity to respond to the above consultation¹. As a Gas Transporter, our review focusses on the changes to the Uniform Network Code (UNC) and Central Data Service Provider (CDSP) arrangements. Overall, we are broadly supportive of the proposed changes to implement the Independent System Operator and Planner (ISOP).

UNC Modifications

We are satisfied that the proposed UNC modifications will enable the ISOP to execute its role as Gas System Planner. As the role develops, further amendments may be required to amend or add to the current provisions.

Industry Committees and Voting Rights

We note the intention for the ISOP to join UNC Modification Panel as a non-voting member and welcome ISOP's engagement in this forum. Although the Panel's voting members are comprised of Shipper, Transporter and customer-nominated representatives, a key duty of all members is to act in the best interests of the industry, and this will be further enhanced by the introduction of Code Managers and Ofgem's Strategic Direction. The ISOP is a key party in this future industry landscape and as such we believe there could be benefit in their nomination including voting rights.

Similarly, we note the intention to add the ISOP as a non-voting customer class to the Data Services Contract (DSC) Committee. Given the nature of the ISOP's activities and the likely close relationship required with the CDSP, we are broadly supportive. However, we would welcome clarification on the mechanics of this arrangement, including updates to the CDSP charging methodology to accommodate the ISOP customer class.

Should you wish to discuss the above further, please do not hesitate to contact me at Hilary.Chapman@SGN.co.uk. We look forward to continued engagement with Ofgem in this area.

Yours sincerely,

Hilary Chapman

Regulation Manager

SGN

¹ [FSO Codes Change Programme – Modifications to implement the ISOP \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/consult/condocs/fsocodes/fsocodes.htm)