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6th June 2024

Dear Sayed,

Wales & West Utilities (WWU) response to Ofgem Statutory consultation on Establishing the Independent System Operator and Planner (ISOP) in GB industry codes 2024

Thank you for the opportunity to respond to this consultation. WWU is a gas transporter serving 2.5 million supply points in Wales and south-west England. This response is not confidential and may be published in full.

We support the changes made directly to the code by GEMA for code related matters, and the Secretary of State for matters of National Security, by exercising their powers under section 169 of the Energy Act 2023. These are aligned to the intent described in previous consultations.

We note the key changes are:

- Governance that enables the NESO to serve code parties with notice of information requests to be provided by the party within a reasonable timeframe and in accordance with the GSP and ESO Licence.
- The Secretary of State can provide direction to the NESO for matters of National Security in which case the NESO can seek temporary relief from liabilities where a direction contradicts code. Any impacted party will also be informed of this.
- Addition of the NESO as a new class of CDSP customer that permits them to nominate a non-voting member to attend DSC committees.
- The code permits the NESO to attend UNC Panel as a non-voting member.
- The code permits the NESO to engage in the code modification process by permitting them to propose modifications, raise alternative modifications, attend workgroups, submit representations, make appeals, and propose derogations.

We understand that the aspiration is for the NESO to become a voting UNC panel member at some point in the future and if so, consideration should be given to how voting arrangements and the balance of party representation at UNC panel will be addressed.

Wales & West Utilities Limited

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Please contact me if you wish to discuss the points that we have raised.

Yours sincerely,



Tom Stuart
Regulation Analyst
Wales & West Utilities