



Response by Northern Powergrid (Northeast) plc and Northern Powergrid (Yorkshire) plc to the statutory consultation on the proposed modifications to industry codes to implement the Independent System Operator and Planner (“ISOP”) that are not related to national security.

#### KEY POINTS

- We believe that the proposed changes meet the objectives of the FSO CCP and have set out a number of drafting-related comments as part of this response.

Comments on the proposed modifications to industry codes to implement the ISOP that are not related to national security.

Q1 Does the package of proposed code changes meet the objectives of the FSO CCP?

We believe that the proposed changes meet the objectives of the FSO CCP, although we have set out below a number of drafting-related comments.

Q2 Do you have any other views or comments relating to the proposed modifications to the Codes (excluding those modifications relating to National Security)

Annex B – Balancing and Settlement Code:

Reference	Comment
Section X-1, definition of “GSP Licence”	It is not clear to us as to why it is necessary to include this defined term in an electricity code. In any event, “GSP” generally means “Grid Supply Point” so, if this defined term and the various references remain in the code, the defined term should be “Gas System Planner (“GSP”) Licence” in order to avoid confusion.
Section X-1, definition of "National Electricity Transmission System Operator (NETSO)"	Simplify by changing to just “has the meaning given to NESO;” because “NESO” is the defined term.

Annex C - Distribution Code:

Reference	Comment
Definition of “CUSC Bilateral Agreement”	Insert “the” before “ISOP”.
Definition of “Demand Control”	Delete the spurious space from before “the ISOP” in bullet (b).
Definition of “ESO Licence”	As “Act” is a defined term, it should be in bold for consistency of presentation.
Definition of “GSP Licence”	It is not clear to us as to why it is necessary to include this defined term in an electricity code. In any event, “GSP” generally means “Grid Supply Point” so, if this defined term and the various references remain in the

	code, the defined term should be “Gas System Planner (“GSP”) Licence” in order to avoid confusion.
Definition of “Information Request Statement”	Change “its ESO Licence” to “the ESO Licence” for consistency.
Definition of “ISOP”	There should be two sentences in the definition such that, subject to our comment regarding “the GSP Licence”, it reads “A person designated by the Secretary of State under section 162 of the Energy Act 2023 as the holder of the ESO Licence and the GSP Licence. For the time being, that person is NESO.”
DGC6.3.1(d)	Remove the bold from the semi-colon at the end of the sentence.
DGC6.3.2	“Energy Act 2023” should not be in bold because it is not a defined term.
DGC6.3.3	<p>Change “any Distribution Network Operators or Users” to “any Distribution Network Operator or User” because the reference is singular.</p> <p>The term “recipient” is used elsewhere in the code so “a recipient” should be changed to “an Information Request Notice Recipient”.</p> <p>“Energy Act 2023” should not be in bold because it is not a defined term.</p>
DGC6.3.4	<p>In the second paragraph, the bold should be removed from “and”.</p> <p>In bullet (a), the bold should be removed from the comma and change “between ISOP and recipient of an Information Request Notice” to “between the ISOP and an Information Request Notice Recipient;”.</p>
DGC6.3.5	Change “A recipient to whom a request is made under DGC6.3.3 ...” to “An Information Request Notice Recipient ...”.
DGC6.3.6(c)	Change “the recipient’s” to “the Information Request Notice Recipient’s”.
DGC6.3.6(d)	Change “the recipient” to “the Information Request Notice Recipient”.
DGC6.4.1	In bullet (a), the bold should be removed from the semi-colon.

DGC6.4.3	The bold should be removed from each reference to “the” before “Distribution Code”.
DGC6.4.4	Reference should also be made to Distribution Network Operators so change to “... will be likely to be caused to Distribution Network Operators and Users, and in such a case will also seek clarification of whether this can be shared with the affected Distribution Network Operators and Users.”
DGC6.4.6	The bold should be removed from “the” before “Distribution Code” in the first line.
DOC5.6.4.2	The bold should be removed from the full stop after “ISOP” in the first sentence.
DOC5.6.5.1	Delete the space after “ISOP” in the second line.
DOC7.3	The bullets should be reset to start at (a).
DOC9.4.5.3	There should be reference to the ISOP so change to “... restoration of supply may be substantially delayed while the ISOP or relevant Transmission Licensee ...”.
DOC9.4.9.1	There should be reference to the ISOP so change to “... in accordance with the ISOP’s or relevant Transmission Licensee’s requirements ...”.
DOC9.4.11	There should be reference to the ISOP so change to “...with the requirements of the ISOP or relevant Transmission Licensee ...”.
DOC12.1.4	Delete the spurious space and “s” after “ISOP”.
Issue Summary – No. 57	Full stops should be added at the end of the first and second bullet points.

**Annex E – Connection and Use of System Code:**

Reference	Comment
Section 2, page 34	Change three references to “ESO” to “NESO”.

Section 10	Given that CMP 223, 293 & 294 have already been implemented, it is unclear as to why changes to this section are required.
Section 11, definition of “Gas System Planner or GSP”	It is not clear to us as to why it is necessary to include this defined term in an electricity code.
Section 11, definition of “Information Request Notice”	Remove bold from “Energy Act 2023” because it is not a defined term.
Section 11, definition of “Information Request Statement”	The defined terms should be in bold and delete the square brackets.
Section 11, definition of “ISOP”	Subject to our comment regarding “the GSP Licence”, change to “a person designated by the Secretary of State under section 162 of the Energy Act 2023 as the holder of the ESO Licence, and the GSP Licence. For the time being that person is the NESO.”
Section 11, definition of “The Company”	Simplify by changing to “NESO or National Energy System Operator” because that is the defined term.
Section 14, “The Residual Tariff”	<p>Insert bullet number 14.15.135.</p> <p>The definition of SGt-1 has been deleted, presumably due to 14.14.12 relating to Small Generation discounts having been deleted. However, the first paragraph includes reference to TNUoS being adjusted for any under or over recovery for and including the small generators discount and the SGt-1 term remains in the formula.</p> <p>This change does not appear to be required to meet the objectives of the FSO CCP. The position should be clarified in any event.</p>
Schedule 2, Exhibit 3, definition of “Electricity Ten Year Statement (ETYS) Works”	Change “Tent” to “Ten”.
Schedule 2, Exhibit 3, 9A.3.2 and 9B.7.2	Delete “or arrange payment” because the addition of that option is not required to meet the objectives of the FSO CCP.

Exhibit F, footnotes 1 and 2, page 2	Change “National Grid Electricity System Operator” to “National Energy System Operator” and change the website link accordingly.
Exhibit O, Parts 1B, 1C and 2C	Insert definition of “ESO Licence” because that term is used in the definition of “Grid Code” and in 12.5.
Exhibit O, Parts 2B, definition of “ESO Licence”	Change to “The licence granted or treated as granted under section 6(1)(da) of the Electricity Act 1989.” for consistency with other definitions.

**Annex F – Grid Code:**

<b>Reference</b>	<b>Comment</b>
Glossary Definitions, definition of “Assimilated Law”	Change to “Has the same meaning given by ...” for consistency.
Glossary Definitions, definition of “Balancing Mechanism”	Add a full stop after “Licence”.
Glossary Definitions, definition of “CUSC”	Add a full stop after “Licence”.
Glossary Definitions, definition of “Data Validation, Consistency and Defaulting Rules”	Delete the spurious “the” from before “The Company” in the second sentence.
Glossary Definitions, definition of “Electricity Ten Year Statement”	Add a full stop after “years”.
Glossary Definitions, definition of “Financial Year”	Change to “As defined in the ESO Licence.” for consistency.

Glossary Definitions, definition of “Gas System Planner or GSP”	It is not clear to us as to why it is necessary to include this defined term in an electricity code. Add a full stop after “1986”, if retained.
Glossary Definitions, definitions of “Information Request Notice” and “Information Request Statement”	“Energy Act 2023” should not be in bold because it is not a defined term and add a full stop at the end of each definition.
Glossary Definitions, definition of “Information Request Statement”	Delete square brackets.
Glossary Definitions, definition of “ISOP”	Subject to our comment regarding “the GSP Licence”, change to “a person designated by the Secretary of State under section 162 of the Energy Act 2023 as the holder of the ESO Licence, and the GSP Licence. For the time being that person is the NESO.”
Glossary Definitions, definition of “Licence Standards”	De-capitalise “condition” in “Condition D3 and/or Condition E16” for consistency.
Glossary Definitions, definition of “System Operator - Transmission Owner Code or STC”	Add a full stop after “Licence”.
Glossary Definitions, definition of “The Company”	Simplify by changing to “NESO or National Energy System Operator” because that is the defined term.
Planning Code, PC4.1(a)	Remove bold from “in accordance with standard condition C12”, change “under its ESO Licence” to “of the ESO Licence” for consistency and delete quotation marks from around “Electricity Ten Year Statement” because it is a defined term.
Planning Code, PC.A.9.6.1.1 and PC.A.9.6.2.1	Change “to meet its ESO Licence” to “under the ESO Licence” for consistency.

Planning Code, PC.A.9.6.2.1	Capitalise “the” before “Company” in the third line for consistency.
Connection Conditions, CC.6.2.1.2(e) and (f)	Change “Seven Year Statement” to “Electricity Ten Year Statement”.
Data Registration Code, page 62	Change “Data to be supplied by the Company to Users pursuant to the Company’s Licence” to “Data to be supplied by the Company to Users pursuant to the ESO Licence” for consistency.
General Conditions, GC17.2	Capitalise “licence” after “ESO” in the third line because it is a defined term.
General Conditions, GC17.3	Remove bold from the comma after “Users” in the fifth line.
General Conditions, GC18.1 and GC18.2	“Energy Act 2023” should not be in bold because it is not a defined term.
General Conditions, GC18.5(f)	Add a full stop at the end of the sentence.
General Conditions, GCB1.1	Change “licensing” to “designation” and “The Company” and “the ISOP” should be in bold because they are defined terms.
General Conditions, B.1.4.4	The Company is NESO and NESO’s previous name is not NGESO so delete “, the company name previously given to The Company.”

**Annex H – Security and Quality of Supply Standard:**

Reference	Comment
General	There are various formatting issues e.g. paragraph indents that should be corrected.
1.5	The notification would come from the ISOP to the network operators so change “In such cases the transmission licensees will notify the network operators affected ...” to “In such cases the ISOP will notify the network operators affected...”.



1.24 and general	It is standard practice in the SQSS for the definitions to be in lower case italics, not capitals, (unless an acronym) so that practice should be adopted here and throughout.
1.24.2	Change the references to “this Grid Code” and “this code” to “this Security and Quality of Supply Standard”.
1.24.2	Change the reference to “this Grid Code” to “this Security and Quality of Supply Standard”.
1.24.3, 1.24.4, 1.24.6, 1.25.2	“User” is not a defined term but is capitalised here so a definition in the context of the SQSS should be provided.
1.24.4	Change “Company” to “ISOP”.
1.24.5, 1.24.6	Change the references to “this code” to “this Security and Quality of Supply Standard”.
1.25.5	Add a colon after “including”.
Definition of “ACS Peak Demand”	Change “spel” to “spell”.
Definition of “Balancing Services”	Insert “the” after “assist”.
Definition of “ESO Licence”	Delete “means” and capitalise “a” for consistency.
Definition of “Frequency and Control Report”	Insert “the” before “ISOP” in the third line.
Definition of “GSP Licence”	<p>It is not clear to us as to why it is necessary to include this defined term in an electricity standard. In any event, “GSP” generally means “Grid Supply Point” so, if this defined term and the various references remain in the SQSS, the defined term should be “Gas System Planner (“GSP”) Licence” in order to avoid confusion.</p> <p>Delete “means” and capitalise “a” for consistency.</p>

Definition of “Information Request Statement”	Add a full stop at the end of the sentence.
Definition of “ISOP”	Subject to our comment regarding “the GSP Licence” change to “A person designated by the Secretary of State under section 162 of the Energy Act 2023 as the holder of the ESO Licence, and the GSP Licence. For the time being, that person is the NESO.
Definition of “Restoration Plan” and	Insert space before “the ISOP”.
Definition of “Transmission Licensee”	To be consistent with paragraph 5.2.6 in the Governance Framework, change “in each case being a party that is required by their licence to comply with the named version of this Security and Quality of Supply Standard, ...” to “in each case being a party that is required by its licence to comply with the most recent version of this Security and Quality of Supply Standard as published on the ISOP’s website, ...”
Appendix E.2	Delete superfluous “the” before “ISOP”.
Appendix H.11	Insert space after “the ISOP”.
Appendix H.19	Delete the superfluous “the” before “ISOP” in the second line and in bullet (a).

**Annex H – Security and Quality of Supply Standard Governance Framework:**

Reference	Comment
General	There are various formatting issues e.g. paragraph indents that should be corrected.
Definition of “Gas System Operator or GSP Licence”	It is not clear to us as to why it is necessary to include this defined term in an electricity document.
2.5, 2.6, 4.2.2.2 and 4.2.2.3	Delete “SQSS” from before “Governance Framework” because “Governance Framework” is the defined term.
3.1(iv)	Delete “electricity” because “Licensee” is the defined term.

5.2.5.1	Add a full stop at the end of the second sentence.
Annex 3	The current link will have to be changed to point to the ISOP’s website.