

## Reference

Statutory consultation on the temporary facilitative licence condition to support the implementation of the Independent System Operator and Planner – Reasons and Effect

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## Ofgem

Future System Operation Team

## By Email:

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## Statutory consultation on the temporary facilitative licence condition to support the implementation of the Independent System Operator and Planner – Reasons and Effect

Thank you for the opportunity to respond and comment on the temporary licence condition. This response is made on behalf of Cadent and can be published by Ofgem and DEZNZ.

*Q1–Are there any foreseeable impacts from the implementation of the temporary licence condition which we should consider?*

We are broadly supportive of the temporary license, providing that the temporary conditions do not undermine the important existing obligations on other licence holders (e.g. Gas Act 1986 Schedule 9 or Standard Special Condition A9 GT Licence etc.).

We would also like to understand how the cost impact of any activities/ requests from the ISOP on industry stakeholders would be handled, as licensees may reasonably expect to incur costs when cooperating with and facilitating the ISOP to achieve the ISOP Implementation Objectives and give effect to the ISOP Change Programme. In the case of gas transporters, we believe that such costs should be pass-through to the ISOP from the outset of RIIO-GD3; utilising a pass-through mechanism would promote visibility of the costs the networks incur in supporting the ISOP and encourage the ISOP to ensure that the requests that other licence holders are obliged to cooperate with are reasonable.

*Q2 – Does the text of the temporary licence condition capture the policy intent as set out in this consultation document?*

Yes, the text does capture the policy intent.

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Q3 – *Do you have any other views or comments relating to the temporary licence condition?*

We remain in support of the NESO and its objectives and look forward to continued engagement with its representatives. This temporary licence will further enable this.

Yours sincerely

Stuart Easterbrook  
Head of Net Zero Energy Frameworks, Cadent