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Modifications to the RIIO-3 licences and associated documents

Dear Stephanie,

Thank you for the opportunity to respond to your consultation on the RIIO-3 Licence Conditions and Associated Documents.

Who we are

NESO lies at the heart of the energy system as an independent, public corporation responsible for planning Great Britain's electricity and gas networks, operating the electricity system and creating insights and recommendations for the future whole energy system.

At the forefront of our efforts is delivering value for consumers. We work with government, regulators and our customers to create an integrated future-proof system that works for people, communities, businesses and industry.

NESO's primary duty is to promote three objectives: enabling delivery of a cleaner, affordable and reliable energy system for current and future consumers. NESO will take a whole system approach, looking across natural gas, electricity and other forms of energy and will engage participants in all parts of the energy ecosystem to deliver the plans, markets and operations of the energy system of today and the future.

Our key points

- Whilst the Licence Conditions are those of the Electricity Transmission, Gas Distribution and Gas Transmission companies, we recognise that there are important interfaces with our own obligations to ensure whole-system outcomes that deliver consumer benefit are achieved in a timely manner.

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- The suite of Associated Documents includes those which NESO is also subject to such as the SIF Governance Document, NIA Governance Document and CSNP Coordination Governance Document. Our comments on proposed changes to these is included in the Appendix on Associated Documents.
- Throughout the Licence Conditions there is reference to both the Independent System Operator and Planner (ISOP) and to “the NESO”. It would be more consistent if these referred to the ISOP throughout with some limited exception. We have included these in the Appendix on Licence Conditions.

We look forward to engaging with you further. Should you require further information on any of the points raised in our response please contact Laura Thomson, Regulatory Policy Manager at Laura.Thomson@neso.energy.

Yours sincerely

Zoe Morrissey

Director of Legal and Regulation