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Consultation on licence modifications to enhance the role of the System Operator

Dear Sheona,

Thank you for the opportunity to respond to this consultation. This response is on behalf of the RWE Group companies within the UK.

Question Box	RWE response
CHAPTER: Two	
1. What are your views on our proposed licence changes for system planning?	No comments
2. What are your views on our proposed timing of the NOA report from 2016/17 onwards?	We are happy with the timings proposed.
3. What are your views on our proposals for the scope and approvals process for the NOA methodology and the NOA report?	We support Ofgems proposals and are supportive of an annual industry consultation on NOA methodology changes.
4. Do you think our proposals for provision of information by the SO are appropriate?	No comments
5. What are your views on the way we propose to formalise the process used to determine efficient connections?	On Non Developer-Led Wider Network Benefits Initiatives (NDLWNBI), we must reiterate that it is vital that NDLWNBI do not conflict with the operation of any offshore wind farm. If the SO believes NDLWNBI may benefit consumers it is paramount that any losses suffered by the operational wind farm, through construction impact or other means, are fully compensated for.
CHAPTER: Three	
6. What are your views on our proposed licence	We are disappointed Ofgem have not committed to investigating the potential for an Independent System Operator

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modifications for conflict mitigation?	(ISO) in the near future. However, in line with the emphasis we have placed on the need to limit conflict of interest we do welcome the addition of a compliance officer and ring-fencing procedures. We suggest Ofgem does a review of whether the industry feels these measures have been successful in addressing concerns after a year of implementation. Depending on the outcome, the review may allow Ofgem to re-evaluate the current stance on ISOs.
7. Do you think there could be any unintended consequences from our proposal to remove special conditions (SpCs) 2D and 2E?	No Comments.

We have no comments on the drafting of the licence modifications.

If you have any questions please do not hesitate to contact myself.

Yours sincerely,

Lewis Elder
Grid Regulation Manager
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