

Respondent details		SP Transmission ITPR Licence Consultation Response			
No.	Condition number	Condition name	Page/Paragraph Ref	Comments	Suggested alternative drafting (please use tracked changes wherever possible)
	20	Business separation requirements and compliance, obligations and conduct of the System Operator in performing its Relevant System Planning Activities	20.12	The definition of the SO function in 20.12 was not as clear as it could be. As written, it prevents disclosure to anyone not engaged in SO functions. What it fails to recognise is that there are people who are engaged in both SO and delivery activities and that confidential information may be disclosed outside the SO, not as a requirement with 20.13, and would still comply with 20.12.	20.12 The licensee must ensure that its employees, agents, contractors and advisers ensure that Relevant System Planning Information is not directly or indirectly disclosed to, solicited, or used by any person who is not engaged in <u>any activities other than</u> System Operator Functions (up to and including the members of the licensee's board), other than as provided for in paragraphs 20.13.

C1	Interpretation of Section C			<p>The draft definition of Major National Electricity Transmission System Reinforcements is set out as follows:</p> <p>means major works undertaken to deliver an increase in capacity on the national electricity transmission system based on the approach set out in the network options assessment methodology. Options to meet system needs that could be considered Major National Electricity Transmission System Reinforcements could include works onshore and offshore, including Strategic Wider Works projects and Offshore Wider Works.</p> <p>The definition above is somewhat ambiguous and open to interpretation. C27 Section 8 goes on to state:</p> <p>The NOA methodology must be designed to facilitate the development of an efficient, co-ordinated and economical system of electricity transmission, and must include (but need not be limited to):</p> <p>(a) the approach used for determining what constitutes Major National Electricity Transmission System Reinforcements;</p>	<p>The draft definition of Major National Electricity Transmission System Reinforcements could be modified as follows:</p> <p>Has the meaning set out in the NOA, the approach for determining the same will be set out in the NOA methodology. Major National Electricity Transmission System Reinforcements could include works onshore and offshore, including Strategic Wider Works projects and Offshore Wider Works.</p> <p>We believe this requires further discussion</p>
C11	Production of information about the national electricity transmission system	3(d)		<p>A general point with regards to the mention of cost benefit analysis, this should be explicitly mentioned when implied.</p> <p>For example, (e) the licensee's best view of the capacity, location and timing of the connection of new interconnectors that could provide value for GB consumers. This should take into account the impact on GB wholesale prices, the provision of ancillary services, constraint management and other operational considerations;</p>	<p>(e) the licensee's best view of the capacity, location and timing of the connection of new interconnectors that could provide value for GB consumers utilising cost benefit analysis. This should take into account the impact on GB wholesale prices, the provision of ancillary services, constraint management and other operational considerations;</p>

	Special condition 6I	Specification of Baseline Wider Works Outputs and Strategic Wider Works Outputs and Assessment of Allowed Expenditure	6I.37 (b)	<p>The drafting is as follows and may contain two typos:</p> <p>the reasons for the request, including the associated needs case and cost-benefit analysis for the Strategic Wider Works Output and Delivery timescales (this should include all relevant supporting analysis such as any analysis undertaken by the system operator as part of its Relevant System Planning Activities). In the event of any difference between the needs case and the analysis produces by the system operator as part of its Relevant System Planning Activities and explanation of the difference and any associated implications must be provided; and</p>	<p>the reasons for the request, including the associated needs case and cost-benefit analysis for the Strategic Wider Works Output and Delivery timescales (this should include all relevant supporting analysis such as any analysis undertaken by the system operator as part of its Relevant System Planning Activities). In the event of any difference between the needs case and the analysis produces produced by the system operator as part of its Relevant System Planning Activities, and an explanation of the difference and any associated implications must be provided; and</p>
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