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By email only to: [electricitySOreform@ofgem.gov.uk](mailto:electricitySOreform@ofgem.gov.uk)

24 July 2018

Dear Grendon

**Notice under section 7A(9) of the Electricity Act 1989 (as amended) of the proposed partial transfer of the electricity transmission licence held by National Grid Electricity Transmission Plc to National Grid Electricity System Operator Limited**

Thank you for the opportunity to respond to the above consultation. Our response should be treated as consolidated on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc.

We note that the National Grid entity, which will hold a transmission system operator licence, does not contain the word "transmission" in its name. Hence, there could therefore be potential confusion as to whether their system operator role is for the whole system. With this in mind (and mindful that the naming of its companies is National Grid's prerogative) we are keen to see that any references in the licence conditions make it clear that the system operator role is for the transmission system.

In addition to the above, we believe that Ofgem should review the distribution licence with all such licence holders to ensure any consequential amendments to that licence are made. These include the definition of *GB System Operator* and *Transmission Licence/Transmission Licensee*.

If you have any queries on the points we have raised please do not hesitate to contact me.

Yours sincerely



James Hope  
Head of Regulation and Regulatory Finance  
UK Power Networks

Copy Paul Measday, Regulatory Returns & Compliance Manager, UK Power Networks