

Entire response submitted as PDF, as online response tool gave insufficient room to provide all relevant information.

Issue: Funding whole system works recommended through NGESO processes

NGESO: 6.2.3.1 'Implement and enhance competition to enable all solution types to compete to meet transmission needs' (P84)

NGET: 'System operability (other ESO requirements) - within period determination' (P65)

SP-T: 'Net Zero Operability Challenges, Net Zero Transition Re-Opener' (P141)

SSE-T: 'Coordinated Adjustment Mechanism' (P139), 'Operability reopener' (P83)

We note the importance of whole system solutions that meet system needs in a way that best delivers value for consumers. We consider it essential that mechanisms are in place to ensure that such solutions can be efficiently funded and delivered in accordance with the results of rigorous whole system assessments.

We also note the importance of availability of assets such as reactive compensation equipment, to support effective modelling of solutions to system issues. We are keen to see measures that encourage (and fund) timely return-to-service of such assets.

Justification of View:

We support the development of a mechanisms for transfer of funding, such as the Coordinated Adjustment Mechanism, that is consistent across network companies and NGESO, such that consumer value can be efficiently delivered following a whole system assessment of asset and flexibility service options to meet system needs. We also support the development of uncertainty mechanisms as a robust alternative to baseline allowances that allow network companies to deliver solutions to operability challenges where ESO whole system assessments reveal them to be in the best interests of consumers.

Issue: Coordinating the development of customer connection portals

NGESO: 7.2.3 (Coordinated development of a connections hub, P105)

NGET: 'IT investment' (P78)

SP-T: 'Meeting the needs of consumers and network users' (P151)

SSE-T: 'Meeting stakeholders' ambitions for connections' (P95)

We welcome the proposals across network companies to enhance the customer connections experience by providing online portals to allow the progress of relevant works to be monitored. However, we note that network companies' plans do not explicitly reference the need to coordinate. We consider it essential that all portals are developed in a consistent and customer-led way, clearly identifying the roles and responsibilities of relevant industry parties.

Justification of View:

We are aware that across all plans, there are proposals to develop online customer connection portals. These are designed to enhance the service that we collectively provide to customers for different aspects of the Great Britain connections process. In our discussions with industry, we have recognised the need to be coordinated on our proposals, and NGESO's Business Plan reflects this need. We have received agreement from the TOs to continue to work together to scope our

respective proposals and engage jointly with customers on the direction of their development. We remain keen to ensure this is the case.

Issue: Improving arrangements for network access and outage management

NGESO: 7.4.5.1 'Enhance the NAP process with TOs' (P116)

NGET: 'Optimise with the ESO through a new mechanism to reduce whole system costs' (P57)

SP-T: 'Whole System ESO-TO Mitigation' (P157)

SSE-T: 'Customer Value Proposition' (P143)

We welcome the opportunity to continue to work with TOs to optimise processes for arranging outages for access to their assets and to mitigate costs of managing constraints.

Justification of View:

We note that TOs have indicated they could do more to investigate alternative ways of working which, though they may cost more, may deliver lower constraint costs overall, and that they have proposed either upside incentives or market-based approaches to fund such activities. We also note that they would need to be funded with sufficient lead-time to allow them to be developed and implemented in time for outage start.

We would be keen to avoid perverse incentives or unintended consequences associated with these proposals. We are supportive of a methodology that would help to further reduce constraint costs for consumers whilst bringing new ways of working to bear; however we are keen to ensure incentives on all parties involved in the process are appropriate, and reflect the extent to which they can influence the desired outcome.

Issue: Enabling zero-MW, high MVar connections

NGESO: 6.2.3.1 'Implement and enhance competition to enable all solution types to compete to meet transmission needs (P84)

NGET: No reference found

SP-T: No reference found

SSE-T: No reference found? Features in queue management? Process for connections.

Also on funding of whole system works and solutions for operability challenges - we are keen to ensure that funding routes exist for third-party solutions that may require a connection that is not based primarily on MW capacity, for example one with high MVar requirements but minimal associated MW, such as for devices we may procure for stability, inertia, voltage management etc.

Justification of View:

In our business plan we have assumed that appropriate funding arrangements will be in place to support delivery of solutions, regardless of the provider type. We recognise this includes network companies having appropriate arrangements to support the preparation of options to feed into NGESO's assessments of proposed solutions, as well as for the delivery of options assessed as being in the best interests of consumers, regardless of whether traditional or novel in nature.

We are keen to ensure all TOs have appropriate access to funding through a consistent mechanism so that such third-party connections can be efficiently funded and delivered.

Issue: Appropriate KPIs around the 90-day connection offer process

NGESO: N/A

NGET: 'Timely Connection Offers' ODI (P25, 80)

SP-T: 'Timely Connection Offers' ODI (P152)

SSE-T: 'Timely Connection Offers' ODI (P94-96)

We note that NGET proposes a 'Timely Connection Offers' Output Delivery Incentive, which would penalise them if they do not provide a connection offer within 90 days. We note that the 90 day period covers activities by multiple parties, and that NGET needs to provide NGESO with information in a timely manner so that it can undertake subsequent activities within the 90 day period.

Justification of View:

NGET's proposed Output Delivery Incentive essentially states that no offer shall be issued after the licensed offer date. However this is not the relevant date for the TO; rather it represents the obligation on the ESO. We recommend that NGET have a measure on the delivery of the TOCO to the ESO in-line with the STC, which refer to the delivery of a draft TOCO within 2 months of clock start and a final TOCO within 2 months and 14 days of clock start ('where it is possible to do so' – as stated in STCP18-1). These dates would seem more appropriate for a KPI than the ultimate 90 day deadline, which risks leaving NGESO with no time to fulfil its remaining obligations.

Other TOs refer in their relevant ODIs to 'Licence timescales' or 'industry standard timescales', which we assume to be in accordance with the provisions of the STC.

Issue: Ensuring adequate system monitoring and protection & control investments to support operation of a zero-carbon system by 2025

NGESO: 'Collaborate with stakeholders to deliver new area monitoring and control systems, to ensure power system stability in a low carbon world (P7), 4.2.3.1 'Enhanced Balancing Capability' (P39)

NGET: 'Invest in protection and control coordination Studies' (P52)

SP-T: 'Protection Systems' (P113)

SSE-T: 'Protection and Control' (P73)

In our business plan we note that we intend to collaborate with stakeholders to deliver new area monitoring and control systems, to ensure power system stability in a low carbon world. We welcome recognition within TO plans of the importance of TO system monitoring and protection & control investments to support operation of a zero-carbon system by 2025.

Justification of View:

NGET's business plan makes specific reference to NGESO's goal of operating a zero-carbon network by 2025, and the need to undertake work to undertake coordination studies and make setting changes to ensure our protection and control systems are robust enough to withstand changes on the network. Other TOs make reference to the need to ensure up-to-date protection systems, including with reference to the need for appropriate and accurate synchronised data to monitor asset and overall system performance, in accordance with STCP 27-01.