

Annex 1

Condition D17: Whole Electricity System Obligations

Introduction

D17.1 The purpose of this condition is to set an obligation on ~~the licensee~~ transmission owners to coordinate with other transmission owners ~~(transmission licensees)~~ and electricity distributors and cooperate in order to build a common understanding of where actions taken by one ~~transmission licensee~~ owner or electricity distributor could have cross-network impacts (both positive and negative). This should include at a minimum sharing information and developing processes that aim to achieve optimal efficiency across the total system. The further purpose is to set an obligation on ~~the licensee~~ transmission owners to coordinate with and consider actions proposed by transmission system users that seek to advance the efficient and economical operation of the licensee's transmission system ~~(its own network)~~.

Part A: Whole electricity system coordination

D17.2 The licensee must coordinate and cooperate with other transmission owners ~~(licensees)~~ and electricity distributors to identify actions and processes that advance the efficient and economical operation of each licensee's transmission system ~~their networks~~.

D17.3 The licensee must consider actions proposed by transmission system users which seek to advance the efficient and economical operation of the licensee's transmission system ~~its network~~.

D17.4 The licensee must use all reasonable endeavours to implement actions or processes identified or proposed through its coordination under paragraphs D17.2 or D17.3 of this condition that:

- (a) will not negatively impact the licensee's transmission system ~~its network~~; and
- (b) are in the interest of the efficient and economical operation of the total system.

Part B: Demonstrating compliance with whole electricity system obligations

Coordination Register

D17.5 The licensee must ~~by no later than twelve months from this condition coming into effect,~~ prepare and ~~is required to~~ publish on its website a coordination register demonstrating the steps it has taken to comply with Part A of this condition ~~by [date 12 months from condition coming into force]~~.

D17.6 The licensee must keep its coordination register up to date and ~~must is required to~~ publish an its updated coordination register ~~(as updated)~~ on its website at least once every twelve months from the date of initial publication under paragraph D17.5 ~~on [date 12 months from, ibid]~~.

Part C: Whole Electricity System Guidance

D17.9 In satisfying the requirements of this condition the licensee must have due regard to the Whole Electricity System Guidance.

D17.10 The Authority will issue and amend Whole Electricity System Guidance by direction.

D17.11 The Authority will publish Whole Electricity System Guidance on the Authority's website.

Commented [MJ-UL1]: section D only applies to Transmission Owner licensees. Through this condition D17 the obligation to coordinate and cooperate is placed on the licensee in its capacity as a TO

Commented [MJ-UL2]: from page 2 of the statutory consultation it appears that the ESO is intended to be out of scope here. As defined, "transmission licensee" includes the ESO. Have therefore changed to refer to the defined term "transmission owner" which captures TOs only

Commented [MJ-UL3]: same point as above. If this is not intended to cover the ESO then reference should be to "transmission owner"

Commented [MJ-UL4]: this term is not defined. Is it clear what is intended / meant here? I suggest the term is defined.

Commented [MJ-UL5]: this term "own network / network" is not defined in the licence. Have therefore suggested referring to the "licensee's transmission system" which is defined as each individual transmission licensee's transmission system

Commented [MJ-UL6]: see same point above

Commented [MJ-UL7]: see same point above

Commented [MJ-UL8]: see same point above

Commented [MJ-UL9]: see same point above

Commented [MJ-UL10]: as currently defined in C1 and as proposed to be defined in this condition, the definition of total system refers to the NETS and therefore captures the HV system offshore. Presumably that is not the intention here?

Commented [MJ-UL11]: more clarity should be provided around the process for the publication, amendment and consultation on the guidance. The drafting suggested adopts the approach to drafting in respect of guidance that has been discussed at the R10 2 licence drafting working groups (for instance in relation to reopen guidance and environmental reporting guidance).

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D17.12 Before issuing the Whole Electricity System Guidance by direction, the Authority will publish on the Authority's website:

(a) the text of the proposed Whole Electricity System Guidance;

(b) the date the Authority intends the Whole Electricity System Guidance to come into effect; and

(c) the time within which representations may be made on the content of the Whole Electricity System Guidance, which will not be less than 28 days.

D17.13 Before amending the Whole Electricity System Guidance by direction, the Authority will publish on the Authority's website:

(a) the text of the amended Whole Electricity System Guidance;

(b) the date the Authority intends the amended Whole Electricity System Guidance to come into effect;

(c) the reasons for the amendments to the Whole Electricity System Guidance; and

(d) the time within which representations may be made on the amendments to the Whole Electricity System Guidance, which will not be less than 28 days.

Part D: Interpretation

D17.1⁴⁰ For the purposes of this condition:

coordination register means a document prepared by ~~the licensee~~ ~~a transmission owner~~ in accordance with its obligations under Part A and Part B of this condition containing at a minimum the information specified in the Whole Electricity System Guidance.

electricity distributor means ~~the holder of a distribution licence~~ ~~any person who is Authorised by an Electricity Distribution Licence~~ ~~to distribute electricity.~~

total system means the national electricity transmission system and the distribution systems of all authorised electricity operators which are located in the national electricity transmission system operator area. *[definition of "total system" in Section A1 of licence to be updated to reference Sections C1 and D17]*

transmission system user means a person producing electricity that is being conveyed by means of ~~the licensee's transmission~~ ~~that transmission owner's~~ system or a customer who owns or who occupies premises that are connected to ~~the licensee's transmission~~ ~~that transmission owner's system.~~

Whole Electricity System Guidance means the document of that name published on the Authority's ~~W~~ website for the purposes of this condition that provides guidance on compliance with this licence condition.

Commented [MJ-UL12]: this term is defined in A1

Commented [MJ-UL13]: this term is not defined in the licence

Commented [MJ-UL14]: as currently defined in C1 and as proposed to be defined in this condition, the definition of total system refers to the NETS and therefore captures the HV system offshore. Presumably that is not the intention here?

Commented [MJ-UL15]: when is this to be done? presumably not as part of this exercise as ESO licence would also need to be changed and is not party to this statutory consultation?

Commented [MJ-UL16]: see same point above

Commented [MJ-UL17]: see same point above