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31 March 2020

Dear Flo

**STATUTORY CONSULTATION ON LICENCE OBLIGATIONS TO ENSURE COORDINATION AND COOPERATION IN THE EFFICIENT AND ECONOMICAL OPERATION OF THE ELECTRICITY SYSTEM**

In response to the above statutory consultation, Northern Powergrid would make the following representations:

- i) As Ofgem has decided that off-shore electricity transmission owners will not be affected by the proposed changes, proposed condition 7A of the electricity distribution licence should not impose obligations on electricity distributors in respect of off-shore transmission systems;
- ii) "Transmission Licensee" is already a defined term in the electricity distribution licence and means "any person who is Authorised by a Transmission Licence to participate in the transmission of electricity". Transmission Licensee, therefore, includes off-shore electricity transmission owners who will not have equivalent obligations in their licences;
- iii) Consequently, off-shore electricity transmission owners should be excluded from the definition of "Transmission Licensee" for the purposes of the proposed condition 7A of the electricity distribution licence;
- iv) Similarly, we note from Ofgem's covering letter to the statutory consultation that the term "Total System" is defined and used in the proposed condition 7A of the electricity distribution licence (as opposed to "Whole System") to align with the existing ESO transmission licence.

However, the definition of "Total System" in the electricity distribution licence cannot align exactly with the definition in the ESO's transmission licence because it includes the GB Transmission System, which is already a defined term in the electricity distribution licence; and

- v) The definition of "GB Transmission System" in the electricity distribution licence is "the system consisting (wholly or mainly) of high voltage electric lines owned or operated by Transmission Licensees within Great Britain...". Offshore transmission systems are, therefore, included in the definition of "Total System".

We have addressed the above issues by our suggested drafting of the proposed condition 7A of the electricity distribution licence in the marked-up copy attached as Appendix A. We have:

- a) Inserted a definition of "Total System Transmission Licensee" such that it includes onshore transmission licensees and the ESO but excludes offshore transmission licensees;

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- b) Inserted the definition of “Offshore Transmission System” from the transmission licence; and
- c) Amended the definition of “Total System” to exclude Offshore Transmission Systems.

We also have some other comments on the drafting of the proposed condition 7A of the electricity distribution licence that are set out in the marked-up copy attached as Appendix A. The rationale for those other suggested changes is as follows:

- a) In the first line of condition 7A.1, we have changed the drafting to “...to coordinate and cooperate with...” to be consistent with condition 7A.2;
- b) In the seventh line of condition 7A.1, we have deleted “coordinate with and” because that is not a requirement of condition 7A.3;
- c) In conditions 7A.1, 7A.3 and 7A.4 (a), we have changed “own network” and “network” to “Distribution System” because “Distribution System” is a defined term in the electricity distribution licence;
- d) In condition 7A.2, we have changed the drafting to “...are in the interest of...” to be consistent with condition 7A.4 (b);
- e) In condition 7A.4, we have deleted “through its coordination” because condition 7A.3 does not require coordination;
- f) In conditions 7A.5 and 7A.6, we have de-capitalised “website” because it is not a defined term;
- g) We have re-numbered condition 7A.9 as condition 7A.7;
- h) We have re-numbered condition 7A.10 as 7A.8; and
- i) In condition 7A.8 (was condition 7A.10), we have:
  - Added a definition of “Authority’s Website”, as the term is used in the definition of “Whole Electricity System Guidance”;
  - Capitalised “Transmission Owner” in the definition of Coordination Register as it is a defined term;
  - Changed “Authorised Electricity Operators” to “Electricity Distributors” in the definition of “Total System” because the definition of “Authorised Electricity Operators” in the electricity distribution licence excludes the licensee itself; and
  - Deleted “...which are located in the GB System Operator area” from the definition of “Total System” because it is superfluous given the use of “...Distribution Systems of all Electricity Distributors”.

We have also attached a copy of the draft Whole Electricity System Guidance as Appendix B showing our suggested changes, which are made in the interests of clarity and consistency with the proposed licence condition and, we believe, enhance the document.

Yours sincerely



John Elliott  
Head of Regulatory Compliance

## **APPENDIX A**

## Condition 7A: Whole Electricity System Obligations

### Introduction

7A.1 The purpose of this condition is to set an obligation on the licensee to coordinate ~~and cooperate~~ with other Electricity Distributors and Total System Transmission Licensees ~~and cooperate~~ in order to build a common understanding of where actions taken by one Electricity Distributor or Total System Transmission Licensee 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 to ~~coordinate with and~~ consider actions proposed by Distribution System Users, that seek to advance the efficient and economical operation of its ~~own network~~Distribution System.

### Part A: Whole electricity system coordination

7A.2 The licensee must coordinate and cooperate with other Electricity Distributors and Total System Transmission ~~L~~icensees to identify actions and processes that ~~advance are in the interest of~~ the efficient and economical operation of the ~~ir networks~~ Total System.

7A.3 The licensee must consider actions proposed by Distribution System Users which seek to advance the efficient and economical operation of its ~~network~~Distribution System.

7A.4 The licensee must use all reasonable endeavours to implement actions or processes identified or proposed ~~through its coordination~~ under paragraphs 7A.2 or 7A.3 of this condition that:

- (a) will not negatively impact its ~~network~~Distribution System; 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

7A.5 The licensee must prepare and is required to publish on its ~~Ww~~website a Coordination Register demonstrating the steps it has taken to comply with Part A of this condition by [*date 12 months from date of condition coming into force*].

7A.6 The licensee must keep up to date and is required to publish its Coordination Register (as updated) on ~~their~~its ~~Ww~~website at least once every twelve months from the date of initial publication on [*date 12 months from, ibid*].

### Part C: Whole Electricity System Guidance

7A.~~7~~9 In satisfying the requirements of this condition the licensee must have due regard to the Whole Electricity System Guidance.

## Part D: Interpretation

7A.~~810~~ For the purposes of this condition:

**Authority's Website** [www.ofgem.gov.uk](http://www.ofgem.gov.uk).

**Coordination Register** means a document prepared by an Electricity Distributor or ~~Transmission~~ ~~Owner~~ in accordance with its obligations under Part A and Part B of this condition **7A** containing at a minimum the information specified in the Whole Electricity System Guidance.

**Distribution System User** means a person producing electricity that is being conveyed by means of that Distribution System or a Customer who owns or who occupies premises that are connected to that Distribution System.

**Offshore Transmission System** means a Transmission System that is used for purposes connected with offshore transmission, as defined in Section 6C of the Electricity Act 1989.

**Total System** means the GB Transmission System (excluding Offshore Transmission Systems) and the Distribution Systems of all ~~Authorised Electricity Distributors~~ ~~Operators which are located in the GB System Operator area.~~

**Total System Transmission Licensee** means a Transmission Licensee but excluding those Transmission Licensees in respect of whose transmission licences the Authority has issued a Section E of the Transmission Licence (offshore transmission owner standard conditions) Direction and where Section E remains in effect (whether or not subject to any terms included in a Section E of the Transmission Licence (transmission owner standard conditions) Direction or to any subsequent variation of its terms to which the licensee may be subject).

**Transmission Owner** means the holder for the time being of a transmission licence in relation to which licence the Authority has issued a Section D of the Transmission Licence (transmission owner standard conditions) Direction and where Section D remains in effect (whether or not subject to any terms included in a Section D of the Transmission Licence (transmission owner standard conditions) Direction or to any subsequent variation of its terms to which the licensee may be subject).

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

## **APPENDIX B**

# Guidance

## Whole Electricity System Guidance – Standard licence condition [D17] ~ [7A]: Licence obligations to ensure coordination and cooperation in planning and operating the whole electricity system

**Publication date:** 06 March 2020

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This guidance document provides explanation and clarification of how we expect Electricity Distributors and transmission owners to interpret standard licence condition [D17] ~ [7A], the Whole Electricity System Licence Condition.

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## 1. Introduction

The Electricity Act 1989<sup>1</sup> requires that electricity transmission and distribution networks are developed and maintained in an efficient, coordinated and economical manner. Traditionally, Electricity Distributors and ~~Transmission~~ ~~Owners~~ have focused on their own networks in isolation when considering how best to achieve this objective.

Established practices are evolving, necessitating further clarifications on our expectations under the Electricity Act 1989. As we set out in the Smart Systems and Flexibility Plan,<sup>2</sup> efficient decision-making on energy network planning and operation requires comprehensive knowledge and understanding of the full range of solutions. These solutions may lie outside an Electricity Distributor's or ~~a Transmission~~ ~~Owner's~~ own boundary, and may include varying degrees of contribution from other Electricity Distributors or Transmission Owners ~~network licensees~~ and non-network parties.

This guidance document provides further explanation of standard licence condition ("SLC") [D17] ~ [7A] ~~to~~. SLC 7A will affect electricity Distribution Network Operators and electricity Independent Distribution Network Operators. SLC D17 will affect onshore electricity ~~Transmission~~ ~~Owners~~, ~~but~~ it will not affect off-shore electricity transmission owners or the Electricity System Operator ("ESO"). For the purposes of this document, SLC [D17] ~ [7A] will be referred to as the Whole Electricity System Licence Condition. The principles-based obligations in the Whole Electricity System Licence Condition are focussed on outcomes, so that the behaviours to achieve the outcomes can evolve in a rapidly changing electricity sector.

### The purpose of this document

The purpose of this document is to provide guidance on what we expect from ~~onshore~~ Electricity Distributors and ~~Transmission~~ ~~Owners~~ under the Whole Electricity System Licence Condition. This guidance also serves to inform wider stakeholders of what they can expect from the relevant Electricity Distributors and Transmission Owners ~~network companies~~, to support a more transparent and efficient framework overall.

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<sup>1</sup> Section 9 of the 1989 Electricity Act: <http://www.legislation.gov.uk/ukpga/1989/29/section/9>

<sup>2</sup> <https://www.ofgem.gov.uk/publications-and-updates/upgrading-our-energy-system-smart-systems-and-flexibility-plan>

Under the Whole Electricity System Licence Condition, licence holders must evidence their performance of the obligations by way of publishing a [Coordination Register](#) on their websites. This guidance includes information on our expectations in regard to demonstrating compliance.

We recognise that the continual change in the energy system may mean that [this guidance document](#) needs to change in future. We will, therefore, keep it under review.

## Principles and proportionality

~~Licence condition SLC~~ [D17] ~ [7A] is a principles-based licence condition. ~~This~~ means that it sets outcomes, or realisable goals for Electricity Distributors and ~~Transmission Owners~~, without prescribing detailed or onerous steps that ~~Electricity Distributors and transmission owners~~ ~~they~~ must follow to reach these outcomes. By taking this approach, it is within the gift of the Electricity Distributors and ~~Transmission Owners~~ to determine the most appropriate mechanisms to reach the outcomes, allows proportionate steps to be taken to do so, and facilitates changes in these steps over time, as appropriate. For example, ~~licence condition SLC~~ [D17] ~ [7A] obliges Electricity Distributors and ~~Transmission Owners~~ to consider proposals for whole electricity system actions and processes ~~provided~~ ~~proposed~~ by [Distribution System Users and Transmission System Users](#) ~~network users~~. ~~The~~ degree of consideration given is, ~~however~~, expected to be proportionate to the strengths of proposal, and the Electricity Distributors and ~~Transmission Owners~~ should be transparent in ~~its~~ ~~their~~ justifications for the degree of consideration given.

## Transmission owners and ~~Electricity System Operator~~ [ESO](#) interactions

In view of the separation of the ESO and National Grid Electricity Transmission plc, we recognise that [Distribution System Users and Transmission System Users](#) ~~network users~~ may approach these parties separately to bring forwards proposals for whole electricity systems outcomes. If a [Distribution System User or Transmission System User](#) ~~network user~~ approaches the ESO, we expect that ~~they~~ [ESO](#) will share relevant information with ~~Transmission Owners~~, in line with ~~their~~ ~~its~~ obligations under licence condition C16.

## 2. ~~2.~~ Definitions

In order to ensure clarity and consistency of interpretations, we have provided guidance on the meaning of the following phrases in the context of the Whole Electricity System Licence Condition. Cooperation and Coordination are commonly understood terms and are, therefore, not defined in the licence. We would expect Electricity Distributors and ~~Transmission~~ Owners to use them as they exist in their ordinary meaning when interpreting their licence conditions.

### Coordination

Coordination is used in part A of the ~~Whole Electricity Systems Licence~~ Condition, at paragraphs [D17.2~7A.2 / D17.3~7A.3], in relation to Electricity Distributors and Transmission Owner~~electricity network licensees~~ only, and in practice, it refers to:

- The effective management and organisation of internal activities and processes that enable Electricity Distributors and Transmission Owner~~electricity network licensees~~ to work together effectively. This may include prioritising, scheduling and sequencing activities, processes and data sharing activities across Electricity Distributors and Transmission Owner~~electricity network licensees~~. As the energy system evolves, coordination will ensure that Electricity Distributors' and ~~Transmission~~ Owners' initiatives, investment planning, and operational processes are sufficiently able to identify and apply the most efficient activities and processes overall, accounting for activities and processes outside the Electricity Distributors' and ~~Transmission~~ Owners' networks. Coordination mitigates risks of duplication and unnecessary additional costs that are not in consumers' best interests.

### Cooperation

Cooperation is used in Part A of the Whole ~~Electricity Systems~~ Licence Condition, at paragraphs [D17.2~7A.2 / D17.3~7A.3] in relation to Electricity Distributors and Transmission Owner~~electricity network licensees~~ only, and in practice, it refers to:

- The process of working together in pursuit of common goals, where two or more parties have an objective that is mutually dependant and they support each other in achieving a beneficial outcome. Combining efforts could relate to the sharing of technological resources, data, digital services, information, or skills. These actions can contribute to faster development of innovations, economies of scale and scope, reducing a cost burden, or spreading risk; and

- Complying readily with reasonable requests, ~~and this~~ which means acting in accordance with, and complying with, requests from other Electricity Distributors and Transmission Owners ~~electricity network licensees~~ where there is a benefit to the whole electricity system and no detriment to their licensee's own network. This extends to not creating undue barriers or difficulties for other Electricity Distributors and Transmission Owners ~~electricity network licensees~~ seeking to work with or gain data and information from that Electricity Distributor or ~~Transmission~~ Owner.

## Whole electricity system outcomes

Whole electricity system outcomes arise from actions taken between two or more parties, at least one of whom holds an electricity ~~transmission or~~ distribution licence, or is a Transmission Owner, that result in both:

- Minimisation of the ~~sum~~ amount expenditure on ~~Transmission and Distribution~~ electricity network systems; and
- Improving or, at a minimum, maintaining the services and benefits received by customers of the ~~electricity network~~ licensee.

### 3. Part A: Whole electricity system coordination

Part A of the Whole Electricity System Licence Condition covers the coordination and cooperation that is required between Electricity Distributors and Transmission Owner~~electricity network licensees~~. This part of the condition comprises three clauses and a logic test. In this guidance, clause 1 is used to refer to paragraph [D17.2] ~ [7A.2], clause 2 ~~for to~~ paragraph [D17.3] ~ [7A.3], and clause 3 ~~for to~~ paragraph [D17.4] ~ [7A.4], which is further divided into sub-clauses 3a and 3b.

In the event that we determine that an Electricity Distributor~~s~~ or a ~~Transmission~~ Owner has breached one or more relevant licence conditions, we may take enforcement action. The factors we ~~take~~ into account when considering enforcement action are set out in our Enforcement Guidelines.<sup>3</sup>

All opportunities for whole electricity system outcomes identified and considered under clauses 1 and 2 are assessed against the requirements set out in sub-clauses 3a and 3b. If both sub-clauses 3a and 3b are satisfied (that is, that the opportunity does not negatively ~~affect~~ impact the operation of the Electricity Distributor's or ~~Transmission~~ Owner's network and is in the interest of the efficient and economical operation of the whole electricity system), the Electricity Distributor~~(s)~~ and/or ~~Transmission~~ Owner~~(s)~~ in question must use all reasonable endeavours to implement the identified opportunity. Figure 1 sets out the logical flow of Part A of the Whole Electricity System Licence Condition.

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<sup>3</sup> <https://www.ofgem.gov.uk/publications-and-updates/enforcement-guidelines>

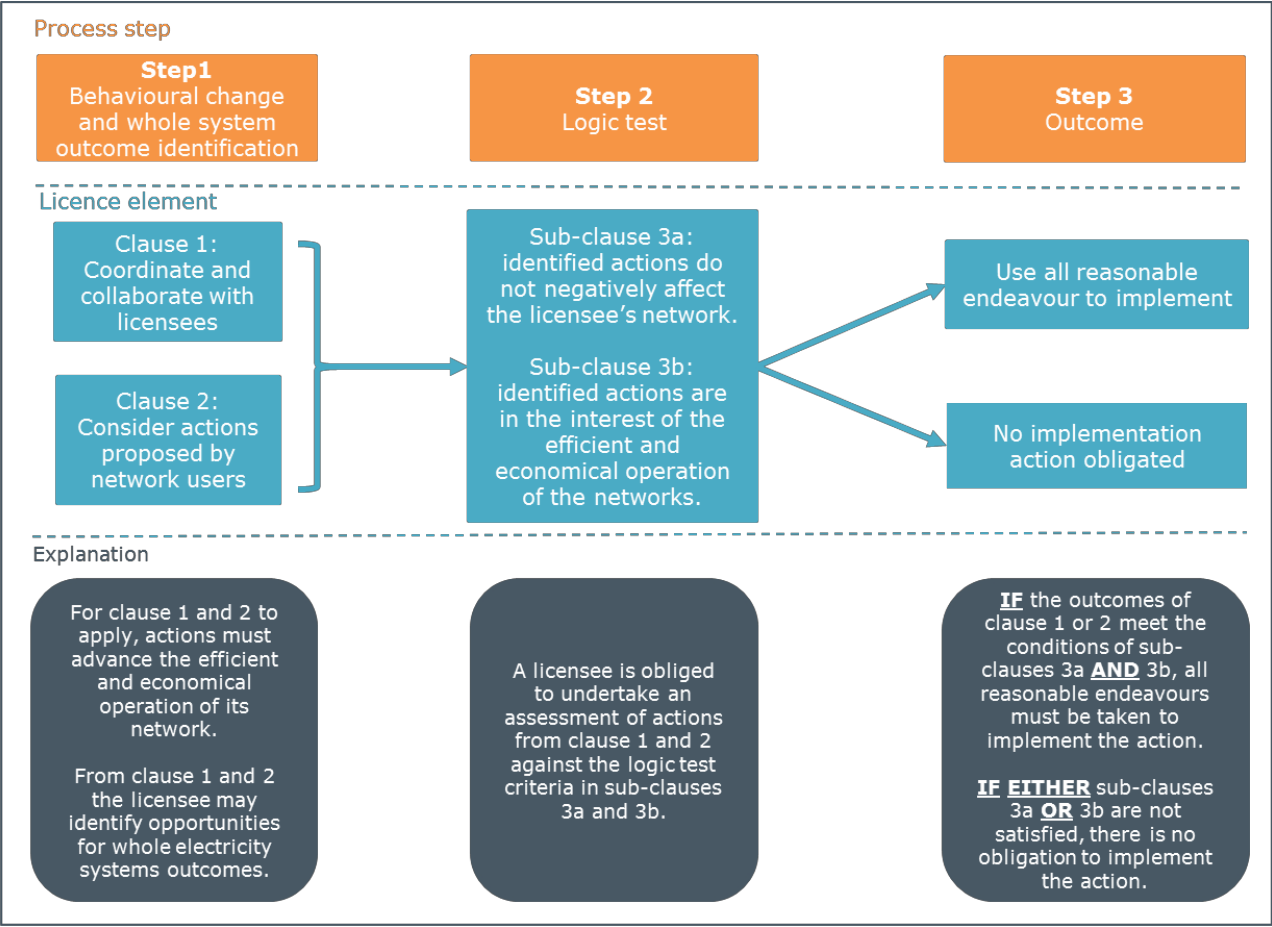


Figure 1. Logic flow of part A of the Whole Systems Licence Condition.

**Clause SLC [D17.2] ~ [7A.2] (clause 1)**

[D17.2] ~ [7A.2] The licensee must coordinate and cooperate with other Electricity Distributors and Transmission OwnersLicensees to identify actions and processes that advance the efficient and economical operation of their networks.

The obligation to coordinate and cooperate may include Electricity Distributors and Transmission Owners are obligated to proactively assessing actions and processes with the potential to improve the efficient and economical operation of their networks. MoreoverIn doing so, the Electricity Distributors and Transmission Owners are required toshould effectively participate in processes that facilitate appropriate communication of operational data and information sharing between electricity network licenseesthem to enable the achievement of whole electricity systems outcomes.

An example of coordination could be an Electricity Distributor or Transmission Owner ~~electricity network licensee~~ approaching relevant Electricity Distributors and Transmission Owners to identify the benefits of procuring market services ~~infor~~ their networks in a coordinated fashion to achieve a more efficient and economical outcome. Another example is the identification of a common set of criteria and a methodology to appraise opportunities for whole electricity system outcomes. This would allow Electricity Distributors and ~~TI~~ Transmission Owners to assess improvement opportunities in a codified and prioritised fashion. Such criteria and ~~the a~~ methodology could identify certain activities, such as voltage control, that span more than one network ~~area~~. Equally, it could also identify certain conditions, such as proximity to boundary locations, that increase the likelihood of wider system impacts.

An example of cooperation is where an Electricity Distributor or Transmission Owner ~~electricity network licensees~~ approaches another Electricity Distributor or Transmission Owner ~~electricity network licensees~~ for data and information on the feasibility of a project, ~~and~~ both parties then make that data and information available to one another in a useable format and timely fashion, subject to any existing conditions relating to competition and data protection law that may be applicable.

## **Clause SLC [D17.3] ~ [7A.3] (clause 2)**

**[D17.3] ~ [7A.3] The licensee must consider actions proposed by [Distribution System Users] ~ [Transmission System Users] which seek to advance the efficient and economical operation of its network.**

In considering proposals from Distribution System Users ~~or and~~ Transmission System Users, the Electricity Distributor or ~~TI~~ Transmission Owner, as appropriate, could develop a prioritisation system to analyse the proposals in a clear and consistent manner. Such a system would provide clarity and transparency to the proposal consideration process.

For example, a Distribution System User or Transmission System User ~~network user~~ may propose an action to trade capacity and associated outage positions with other Distribution System Users or Transmission System Users ~~network users~~. This position could be informed by improved data and information availability, such as an Electricity Distributor's or ~~TI~~ Transmission Owner's resource register. On receipt of such a request, an Electricity Distributor or ~~TI~~ Transmission Owner should ~~determine~~ consider whether ~~the request~~ is in the interest of the efficient and economical operation of the its- network and, if it is, consider the request. While the obligation under this clause is limited to *considering* what Distribution System Users or Transmission System Users ~~network users~~ propose, the Electricity Distributor



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or ~~the~~ Transmission ~~the~~ Owner should coordinate with other Electricity Distributors or Transmission Owners ~~electricity network licensees~~ on those proposals with cross-network implications in order to meet its obligations under Clause 1.

An example of the type of processes that should be considered by Electricity Distributors and ~~the~~ Transmission ~~the~~ Owners is where a Distribution System User or a Transmission System User ~~network user~~ proposes amendments to an existing network planning processes. The amendment(s) has the potential to lead to a whole electricity system outcome through an efficiency improvement. The efficiency improvement would be of benefit to the Electricity Distributor or ~~the~~ Transmission ~~the~~ Owner directly, and could also benefit other ~~the~~ Electricity Distributors or Transmission Owners ~~network licensees~~, either by them implementing the process improvement, or from the process outcome itself. The proposal should be fully considered, if it can demonstrate that it will advance the efficient and economical operation of the Electricity Distributor's or Transmission Owner's network, ~~and~~ not solely optimise a third party's business position.

~~While the~~ Whole Electricity System ~~the~~ Licence ~~the~~ Condition does not place an obligation on Electricity Distributors and Transmission Owners to engage with third parties who do not ~~non-~~ ~~users of~~ their networks. However, for the avoidance of doubt, it does not ~~to~~ restrict Electricity Distributors and ~~the~~ Transmission ~~the~~ Owners from engaging with such third parties, ~~where those third parties~~ if those third parties are able to support or contribute to efficient whole system outcomes ~~where they are not an Electricity Distributor's or transmission owner's network user~~.

### Clause SLC [D17.4] ~ [7A.4] (clause 3)

[D17.4] ~ [7A.4] The licensee must use all reasonable endeavours to implement actions and processes identified and proposed through coordination its activities under paragraphs [D17.2 or D17.3] ~ [7A.2 or 7A.3] of this condition that:

- (a) will not negatively impact its network; and
- (b) are in the interest of the efficient and economical operation of the ~~Total~~ Whole System.

This condition applies where processes or actions have been identified through Clauses 1 and 2. Where the change meets both criteria contained in ~~S~~sub-clauses ~~(3a)~~ and ~~(3b)~~, there is an obligation on ~~the~~ Electricity Distributors and ~~the~~ Transmission ~~the~~ Owners to use all reasonable endeavours to implement it. This is a quantified obligation to account for the fact that there may be proposals that could meet the test but it is justifiable not to implement them.

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Situations that may make it ~~un~~not justifiable to implement a solution include proposals with an exceptionally high level of complexity to implement or those that require significant ongoing risk or expenditure to maintain.

Accordingly, where a proposed action negatively ~~affects~~impacts the operation of its network (and, therefore, ~~their network's~~sits customers) or does not advance the efficient and economic<sup>al</sup> operation of the ~~Electricity System~~relevant network(s), ~~the~~ Electricity Distributors and ~~t~~Transmission ~~e~~Owners are not oblig~~ed~~ated to take further action.

There may be instances where a proposed network solution results in increased financial expenditure for a particular ~~network~~licensee, but nevertheless promises to yield a financial benefit for the electricity system as a whole. Achievement of this type of whole electricity system outcome may be facilitated through remuneration transfers between affected ~~Electricity Distributors and Transmission Owner~~electricity network licensees. We expect ~~Electricity Distributors and Transmission Owner~~electricity network licensees to determine the appropriate remuneration transfer mechanism ~~for~~according to the circumstances that prevail in respect of a given proposal.

For example, through coordination during planning phases, network licensee A identifies an opportunity to mitigate an issue on ~~their~~its network through work being undertaken on another network operated by network licensee B. Network licensee A requests network licensee B to provide cost estimate data for the work, with which ~~network licensee B~~they cooperate~~s~~with. The cost estimate shows that it is less expensive if network licensee B carries out the work than if network licensee A attempts to solve the issue by action on its own network only. As there are additional costs for network licensee B's network ~~from~~as a result of the work, the network licensees agree appropriate remuneration that represents fair value for both ~~sets of networks~~licensees' customers. This results in the total cost ~~of the network~~ being lower than it otherwise would have been and each network~~'s~~ customers receiving benefits.

## 4. Part B: Demonstrating compliance with whole electricity system obligations

### Coordination Register

- |                  |   |
|------------------|---|
| [D17.5] ~ [7A.5] | The licensee must prepare and is required to publish on its <del>W</del> website a Coordination Register demonstrating the steps it has taken to comply with Part A of this condition by [ <i>date being 12 months from date the condition coming into force</i> ]. |
| [D17.6] ~ [7A.6] | The licensee must keep up to date and is required to publish its Coordination Register (as updated) on its <del>W</del> website at least once every twelve months from the date of initial publication on [ <i>date 12 months from, ibid</i> ].                     |

To comply with the Whole Electricity System Licence Condition, the Electricity Distributors and ~~Transmission~~ owners must publish a Coordination Register within the first twelve months of the condition becoming operative, and thereafter, must publish an updated Coordination Register *at least* once in every twelve-month period from the date of the initial publication. For the avoidance of doubt, updates can be more frequent than once a year.

The purpose of the Coordination Register is for the Electricity Distributors and ~~Transmission~~ ~~Owners~~ to clearly and transparently demonstrate the process ~~it has~~they have undertaken to coordinate and cooperate with other Electricity Distributors and Transmission Owners~~electricity network licensees~~, and to consider proposals from Distribution System Users or Transmission System Users, as appropriate~~systems users~~ which seek to advance the efficient and economical operation of the Electricity Distributor's or Transmission Owner's~~its~~ network. This will allow other Electricity Distributors and Transmission Owners~~electricity network licensees~~ and Distribution System Users and Transmission System Users~~users~~ to understand ~~what the~~ opportunities that have been identified and to learn from them, so advancing the industry's understanding of the possibilities across a broad range of scenarios. The Coordination Register should be evidence based, and contain details of active and completed actions, rather than forthcoming actions.

Information to be included in ~~any~~ Coordination Register (or update thereto) comprises:

- Details of all relevant coordination and cooperation activities completed with other ~~e~~Electricity Distributors and Transmission Owners~~network licensees~~ during a relevant period to develop whole electricity ~~systems~~ outcomes, including data sharing~~;~~

- Details of any actions or processes that have been implemented (or are being implemented) as a result of coordination and cooperation activities completed with other Electricity Distributors and Transmission Owners; ~~electricity network licensees~~.
- ~~As well as a~~ concise and clear summary of actions or processes arising as a result of coordination and cooperation activities completed with other Electricity Distributors and onshore transmission owners that were not deemed to be ~~apt~~ appropriate for implementation, including the reason(s) for that decision; ~~:-~~
- Details of all proposals received during a relevant period from Distribution System Users or Transmission System Users ~~system users~~ to advance the efficient and economical operation of Electricity Distributors' and/or ~~Transmission Owners'~~ networks; ~~:-~~
- ~~Details of any system user proposals received from Distribution System Users or Transmission System Users that have been implemented (or are being implemented); and~~
- ~~As well as a~~ concise and clear summary of proposals received from Distribution System Users or Transmission System Users that were not deemed to be ~~apt~~ appropriate for implementation, including the reason(s) for that decision.

The Coordination Register should inform its reader about the whole electricity system actions Electricity Distributors and ~~Transmission Owners~~ have considered and taken. The reader should be able to clearly understand the justifications given for approving or rejecting proposals from other Electricity Distributors and Transmission Owners and from Distribution System Users and Transmission System Users; ~~electricity network licensees and systems users~~; being those which seek to advance the efficient and economical operation of ~~its the~~ relevant network in isolation or in combination with other Electricity Distributors and Transmission Owners ~~electricity network licensees~~.

The Coordination Register should be published on Electricity Distributors' and ~~Transmission Owners'~~ websites in a discoverable place; ~~and its format should meet modern expectations~~ s for data sharing (such as portability, machine readable, easily discoverable searchable and understandable information). For the avoidance of doubt, the Coordination Register ~~does not require our prior Ofgem approval~~. However, we expect Electricity Distributors and ~~Transmission Owners~~ to enable Distribution System Users and Transmission System Users ~~system users~~ to provide feedback on the content and format of the Coordination Register.

Guidance – Licence obligations to ensure coordination and cooperation in planning and operating the whole electricity system

Electricity Distributors and ~~†~~Transmission ~~o~~Owners should retain data on proposals brought forward by Distribution System Users or Transmission System Users~~network-users~~ in a secure fashion. The publication of the Coordination Register~~7~~, and the handling of ~~network-user~~any personal data included in proposal data~~7~~, received from Distribution System Users and Transmission System Users should be managed in accordance with the General Data Protection Regulations ~~(GDPR)~~.<sup>4</sup> Electricity Distributors and ~~†~~Transmission ~~o~~Owners should retain proposals and associated data for a period of five years, after which it should be permanently deleted.

Distribution System Users and Transmission System Users~~Network-users~~ may opt to remove identifiable information for publication in the ~~e~~Coordination ~~r~~Register. The responsibility for requesting the removal of identifiable information lies with the Distribution System Users and Transmission System Users~~network-users~~, and must be made clear to the Electricity Distributors and Transmission ~~o~~Owners.

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<sup>4</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>