

Licence consultation response template

Respondent details		National Grid Electricity Transmission plc			
Licence/Document name	Condition/Section number	Condition/Section name	Page/Paragraph Ref	Comments	Suggested alternative drafting (please use tracked changes wherever possible)
Licence held by National Grid Interconnectors Limited (IFA)	Special Condition 1 Special Condition 2	Determination of the Interconnector Payment term Provision of information to the GB System Operator		<p>As the text is currently written, there is a requirement on the licensee, in Special Condition 2, to provide its best estimate to the System Operator of the value of the Interconnector Payment term by a specified date, but the text also provides for revised values to be notified if they will be materially different. It is not clear what the consequences of such revision are intended to be in the context of a relevant year.</p> <p>This estimated value will be taken into account in the TNUoS charge setting for the charging year and as drafted it is not clear when the difference between the original and any revised estimates will be accounted for.</p> <p>Given timing and if the estimate submitted at the specified date is not binding, if that value subsequently changes, NGET may receive more or less payment than anticipated and would be exposed to revenue over- or under- recovery that year that the charges in cannot be adjusted for.</p>	<p>To provide that where revised estimates are received after the specified date, that the adjustment will be managed through the following relevant year and the ICFT paid is based on the estimates submitted by the CUSC specified date.</p> <p>Alternatively assuming we have interpreted the intent of Nemo Special Condition 10, paragraph 16 a similar approach could be adopted.</p>
Electricity Interconnector Standard Conditions And Licence held by Nemo Link Limited	Special Condition 2 Standard Condition 26	Provision of information to the GB System Operator		<p>As above, it is not clear when the difference between the original and any revised estimates will be accounted for in Standard Condition 26. Para 16 in Nemo Special Condition 10 may cover this with reference to "shall be paid ... in accordance with applicable requirements in the CUSC" however we suggest further clarifying the provisions</p>	

Licence held by Nemo Link Limited	Special Condition 1 (Nemo)	Definitions and Interpretation Provision of information to the GB System Operator		<p>The definition of Relevant Year in the NEMO Special Conditions states “beginning on 1 January and ending on 31 December”. However the Relevant Year in Standard Condition 26 is “year beginning on 1 April...”</p> <p>If the Relevant Year for the licensee is the 12 month period beginning 1 Jan, each Relevant Year will span two charging years. As such the notification of ICF will be required as a monthly schedule. It appears that a provision to require the information in this format is not currently in the proposed licence drafting.</p> <p>A possible solution to this would be to amend Standard Condition 26 to put a requirement on the licensee to notify the GB System Operator of the ICF information according to the provisions of the CUSC (which can be modified to provide details on this).</p>	

