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12/09/2022

Letter of request for C16 consultation extension

Dear Sir/Madam,

NGESO has now concluded its licence obligation requirement to consult on proposed C16 changes for 28 days. The C16 consultation closed on 5th September 2022. NGESO is submitting these responses and it's reply to Ofgem as evidence of this.

Following feedback from industry on the proposed changes to several C16 documents, including the Procurement Guidelines, Balancing Principles, ABSVD and SMAF statements we would like to ask Ofgem to allow us to reopen and extend the consultation window by another 2 weeks. An Ofgem decision in response to this request would be appreciated by the 14th September 2022, allowing us to issue a further consultation closing on the 28th September 2022.

Respondents to our consultation raised several concerns such as our approach to system flagging the winter contingency contracts and the resulting impact on cash out prices as well as suggestions for the Winter Demand Flexibility service to be added to the Balancing Principles Statement and SMAF. To provide industry a chance to provide comment on the changes we have made following this feedback, and to resolve their concerns, we consider a further consultation is appropriate.

With this letter of request, we have provided the C16 statements as submitted with the previous consultation, tracked to show our latest changes, together with the industry responses we have received. This is to provide evidence that NGESO has fulfilled its licence obligation, noting that no updated C16 statements will be published until the end of the extension period.

Following the sad passing of Her Majesty the Queen, NGESO with careful consideration has decided it is appropriate to send this letter and associated documents to Ofgem. Due to the challenges associated with delivering the winter contingency contracts and demand flexibility service delivery, we consider this to be business and transmission licence critical.

If you have any questions in regard to this letter or the submitted statements please contact Ruby Pelling (ruby.pelling@nationalgrideso.com) in the first instance.

Yours faithfully,

Jonathan Wisdom
Code Change Delivery Senior Manager
National Grid ESO