

Code Administrator Consultation Response Proforma**CM086: Introducing Competitively Appointed Transmission Owners & Transmission Service Providers**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to stcteam@nationalgrideso.com by **5pm on 08 February 2024**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact Catia Gomes catia.gomes@nationalgrideso.com or stcteam@nationalgrideso.com

| Respondent details | Please enter your details | |
|--|--|--|
| Respondent name: | Alana Collis/ Steve Baker | |
| Company name: | ESO | |
| Email address: | Alana.collis-dugmore@nationalgrideso.com | |
| Phone number: | 07843804628 | |
| Which best describes your organisation? | <input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input type="checkbox"/> Distribution Network Operator <input type="checkbox"/> Generator <input type="checkbox"/> Industry body <input type="checkbox"/> Interconnector | <input type="checkbox"/> Storage <input type="checkbox"/> Supplier <input checked="" type="checkbox"/> System Operator <input type="checkbox"/> Transmission Owner <input type="checkbox"/> Virtual Lead Party <input type="checkbox"/> Other |

I wish my response to be:

(Please mark the relevant box)

☒ Non-Confidential☐ Confidential

Note: A confidential response will be disclosed to the Authority in full but, unless agreed otherwise, will not be shared with the Panel or the industry and may therefore not influence the debate to the same extent as a non-confidential response.

For reference the Applicable STC Objectives are:

- efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
- development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
- facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
- protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
- promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*

- f) *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
- g) *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

Please express your views in the right-hand side of the table below, including your rationale.

| Standard Code Administrator Consultation questions | | |
|--|---|---|
| 1 | Please provide your assessment for the proposed solution against the Applicable Objectives? | <p>Mark the Objectives which you believe the proposed solution better facilitates:</p> <p>Original <input checked="" type="checkbox"/>A <input type="checkbox"/>B <input type="checkbox"/>C <input type="checkbox"/>D <input type="checkbox"/>E <input type="checkbox"/>F <input type="checkbox"/>G</p> <p>Introduction of CATOs to the codes enables the CATO to participate in the transmission network. This supports the development of the NETS, drive resilience and support value to the Consumer. The proposed modification ensures that commercial and technical obligations of CATOs, as transmission licensees, are clearly established.</p> |
| 2 | Do you have a preferred proposed solution? | <p><input checked="" type="checkbox"/>Original <input type="checkbox"/>Baseline <input type="checkbox"/>No preference</p> <p>We believe that the Legal text solution adequately provides for CATOs to participate in the NETS</p> |
| 3 | Do you support the proposed implementation approach? | <p><input checked="" type="checkbox"/>Yes <input type="checkbox"/>No</p> <p>ESO supports the agreed implementation approach</p> |
| 4 | Do you have any other comments? | This modification forms part of a suite of modifications across the Codes to enable implementation of Early Competition through the CATO regime. |