

Workgroup Consultation Response Proforma

GSR031: Introducing Competitively Appointed Transmission Owner

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 box.sqss@nationalgrideso.com by **5pm on 10 March 2023**. 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 box.sqss@nationalgrideso.com

Respondent details	Please enter your details
Respondent name:	Graeme Vincent
Company name:	SP Energy Networks
Email address:	graeme.vincent@spenergynetworks.co.uk
Phone number:	07753 622336

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 SQSS Objectives are:

- i) facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;
- ii) ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;
- iii) facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and
- iv) facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law.

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

Standard Workgroup Consultation questions		
1	Do you believe that the Original Proposal better facilitates the Applicable Objectives?	Mark the Objectives which you believe the solution better facilitates:
		Original <input checked="" type="checkbox"/> i <input checked="" type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv
		Based on the assumption that the enabling legislation has been enacted – as only at this point will there be a defect in the existing SQSS legal text which will need to be addressed to accommodate the concept of Competitively Appointed Transmission Owners (CATOs).
2		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

	Do you support the proposed implementation approach?	Yes, we support the implementation approach but as with our response to the recent Grid Code modification (GC0159) we believe that any modification should not be submitted for decision until the relevant enabling legislation has been enacted (this applies to both the primary legislation and any subsequent secondary legislation which is required). This will ensure that the defects and assumptions which have been considered during the development of the proposed solution are valid and the solution does not need revising as a result of any changes to primary legislation or from the development of any secondary legislation requirements.
3	Do you have any other comments?	No