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- Click 'Turn on live captions'

NESO Operational Transparency Forum

23 October 2024



Introduction | Sli.do code #OTF

Slido code #OTF

To ask questions live & give us post event feedback go to Sli.do event code #OTF.

- Ask your questions as early as possible as our experts may need time to ensure a correct answer can be given
 live.
- Please provide your name or organisation. This is an operational forum for industry participants therefore questions from unidentified parties will not be answered live. If you have reasons to remain anonymous to the wider forum, please use the advance question or email options below.
- The OTF is not the place to challenge the actions of individual parties (other than the NESO), and we will not comment on these challenges. This type of concern can be reported to the Market Monitoring team at: marketreporting@nationalenergyso.com
- Questions will be answered in the upvoted order whenever possible. We will take questions from further down
 the list when: the answer is not ready; we need to take the question away or the topic is outside of the scope of
 the OTF.
- Sli.do will remain open until 12:00, even when the call closes earlier, to provide the maximum opportunity for you to ask questions. After that please use the advance questions or email options below.
- All questions will be recorded and published. Questions which are not answered on the day will be included, with answers, in the slide pack for the next OTF.
- Ask questions in advance (before 12:00 on Monday) at: https://forms.office.com/r/k0AEfKnai3
- Ask questions anytime whether for inclusion in the forum or individual response at: box.nc.customer@nationalenergyso.com

Stay up to date on our webpage: https://www.neso.energy/what-we-do/systems-operations/operational-transparency-forum (OTF Q&A is published with slide packs)



Future deep dive / focus topics

Slido code #OTF

Today

No deep dives

Future

Clean Power 2030 - 6 November

Operational Margins – TBC November

Initial National Demand Outturn - TBC

Information share on FRCR 2025 (scope, deep dives and key dates) – TBC

If you have suggestions for future deep dives or focus topics, please send them to us at: box.nc.customer@nationalenergyso.com and we will consider including them in a future forum



Technical issues at last week's forum...

We are aware of and apologise for the accessibility issues faced at last week's Operational Transparency Forum (16.10.2024). After some investigation, we can confirm this was due to recent NESO system changes.

To ensure you are able to successfully join the NESO OTF going forwards, please register & subscribe to receive OTF communications using this <u>link</u>. You will then be sent an email with the latest calendar invite. If you are already subscribed then you do not need to do anything, you will receive an email with the latest calendar invite and joining options.

We encourage everyone to **remove their existing calendar invitations (predating 16.10.2024)**, which will no longer allow you to access the forum.



Quick Reserve



Quick Reserve phase I mock auctions and weekly drop-in sessions

As we continue towards our mock auctions between **28 October and 8 November** for phase 1 of Quick Reserve, join us for our <u>weekly drop-in sessions</u> each Thursday, these sessions are for providers to ask the team any questions regarding Quick Reserve and during the session on **24 October** we will cover the end-to-end process for participation in the service.



LCP Delta - skip rate methodology



Last week we gave early indication of an event to introduce the LCP Delta skip rate measurement methodology.

We can now announce that this webinar will be held on 07/11/2024 at 3pm.

You can register for this event by following this link

https://events.teams.microsoft.com/event/lcc3f72a-b6a2-479b-a80c-lc2b3846a890@f98a6a53-25f3-4212-901c-c7787fcd3495

The event will be hosted by NESO with the methodology being presented by Chris Matson at LCP.

Additional queries can be sent to <u>.box.battery-storage-strategy@nationalgrideso.com</u> and <u>Box.Battery-Storage-Strategy@uk.nationalenergyso.com</u>.

We will be publishing the full report in November and will also be hosting one-on-one surgeries in the weeks following the webinar. During surgeries there will be further opportunity to ask any specific queries on the methodology.



Future Event Summary

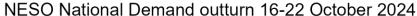


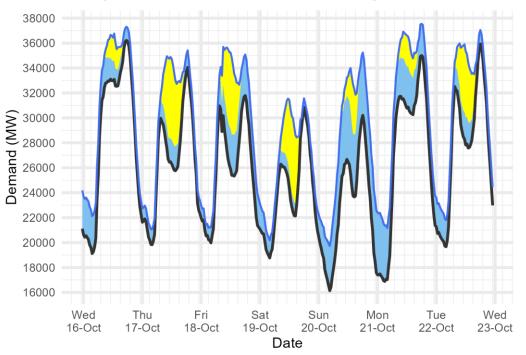
Event	Date & Time	Link
Quick Reserve Phase 1 Weekly Drop In Sessions	24 October 2024 – 07 November 2024	<u>Sign Up</u>
LCP Delta – skip rate methodology	7 November 2024 (3pm)	Sign Up
Markets Forum	11 November 2024 (10am)	Sign Up



Demand | Last week demand out-turn

Slido code #OTF





Renewable type

Distributed_PV
Distributed_Wind

Demand type

- National Demand (ND) transmission connected generation requirement within GB
- ND + est. of PV & wind at Distribution network

Distributed generation

Peak values by day

lay	OUTTURN	
	Daily Max	Daily Max
Date	Dist. PV	Dist. Wind
	(GW)	(GW)
16 Oct 2024	2.2	3.1
17 Oct 2024	6.5	2.0
18 Oct 2024	6.2	3.4
19 Oct 2024	6.4	2.3
20 Oct 2024	4.0	5.1
21 Oct 2024	2.5	5.0
22 Oct 2024	5.4	2.4

National Demand

Peaks and troughs

0		FURECASI (1	wed to Octi	UUII	UKIN
Date	Forecasting Point	National Demand (GW)	Dist. wind (GW)	National Demand (GW)	Dist. wind (GW)
16 Oct 2024	Evening Peak	36.3	1.3	36.2	1.1
17 Oct 2024	Overnight Min	20.2	1.1	19.8	1.2
17 Oct 2024	Evening Peak	36.4	1.1	34.1	1.3
18 Oct 2024	Overnight Min	19.8	1.3	20.0	1.2
18 Oct 2024	Evening Peak	33.3	3.4	31.8	3.3
19 Oct 2024	Overnight Min	18.4	1.8	18.8	1.4
19 Oct 2024	Evening Peak	33.1	1.3	30.8	0.7
20 Oct 2024	Overnight Min	15.7	3.8	16.1	3.6
20 Oct 2024	Evening Peak	30.9	4.2	30.2	5.0
21 Oct 2024	Overnight Min	16.9	3.3	16.9	4.5
21 Oct 2024	Evening Peak	34.8	2.9	35.0	2.5
22 Oct 2024	Overnight Min	18.5	2.8	19.7	2.1
22 Oct 2024	Evening Peak	35.2	2.2	35.9	1.1

EORECAST (Wed 16 Oct)

The black line (National Demand ND) is the measure of portion of total GB customer demand that is supplied by the transmission network.

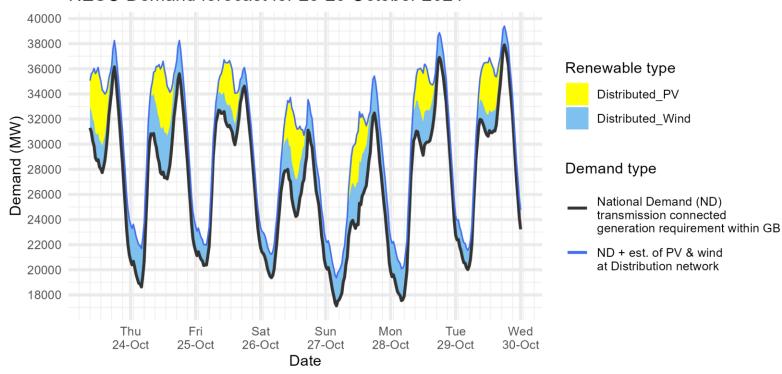
ND values <u>do not include</u> export on interconnectors or pumping or station load

Blue line serves as a proxy for total GB customer demand. It includes demand supplied by the distributed wind and solar sources, but it <u>does not include</u> demand supplied by non-weather driven sources at the distributed network for which NESO has no real time data.

Historic out-turn data can be found on the <u>NESO Data Portal</u> in the following data sets: Historic Demand Data & Demand Data Update

Demand | Week Ahead

NESO Demand forecast for 23-29 October 2024



The black line (National Demand ND) is the measure of portion of total GB customer demand that is supplied by the transmission network.

ND values <u>do not include</u> export on interconnectors or pumping or station load

Blue line serves as a proxy for total GB customer demand. It includes demand supplied by the distributed wind and solar sources, but it <u>does not include</u> demand supplied by non-weather driven sources at the distributed network for which NESO has no real time data.

Slido code #OTF

National Demand

Peaks and troughs

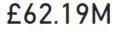
FORECAST (Wed 23 Oct)

J		FURECASI (wed 25 Octi	
	Date	Forecasting Point	National Demand (GW)	Dist. wind (GW)
	23 Oct 2024	Evening Peak	36.2	2.1
	24 Oct 2024	Overnight Min	18.6	3.1
	24 Oct 2024	Evening Peak	35.6	2.7
	25 Oct 2024	Overnight Min	20.3	1.7
	25 Oct 2024	Evening Peak	34.6	1.5
	26 Oct 2024	Overnight Min	19.4	1.9
	26 Oct 2024	Evening Peak	31.1	2.4
	27 Oct 2024	Overnight Min	17.1	2.2
	27 Oct 2024	Evening Peak	32.5	2.9
	28 Oct 2024	Overnight Min	17.5	2.5
	28 Oct 2024	Evening Peak	36.9	2.0
	29 Oct 2024	Overnight Min	20.0	1.5
	29 Oct 2024	Evening Peak	37.9	1.4



NESO Actions | Category Cost Breakdown

Slido code #OTF



Weekly Total

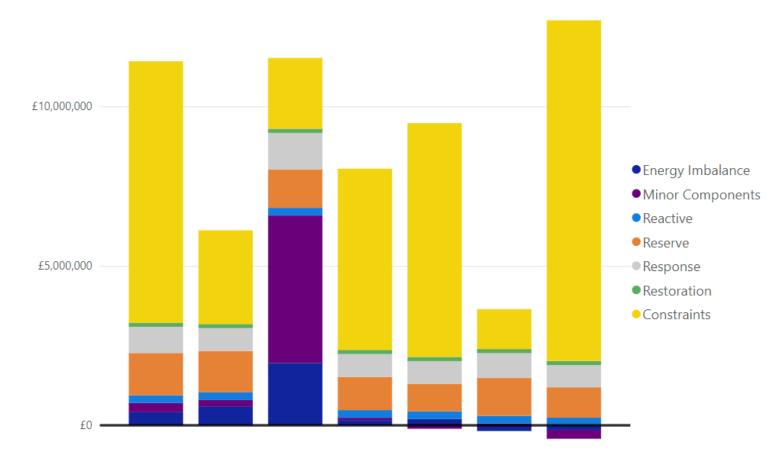
£53.00M

Previous Week Total

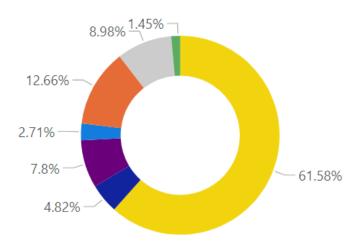
£6.37M

Past 30 Days Average

Date ▲	Total (£)
12/10/2024	£11,411,398
13/10/2024	£6,113,311
14/10/2024	£11,516,385
15/10/2024	£8,044,574
16/10/2024	£9,367,140
17/10/2024	£3,460,855
18/10/2024	£12,274,245
Total	£62,187,907

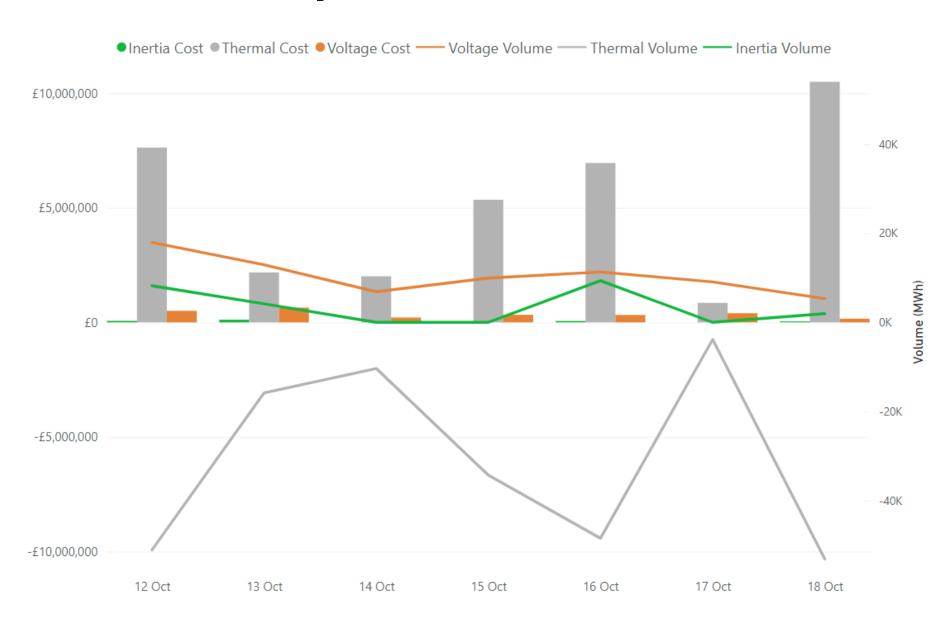


Share of Cost





NESO Actions | Constraint Cost Breakdown



Slido code #OTF

£2.6M

Sum of Voltage Cost

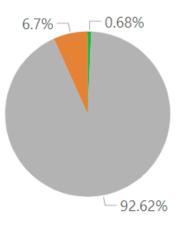
£261.4K

Sum of Inertia Cost

£35.5M

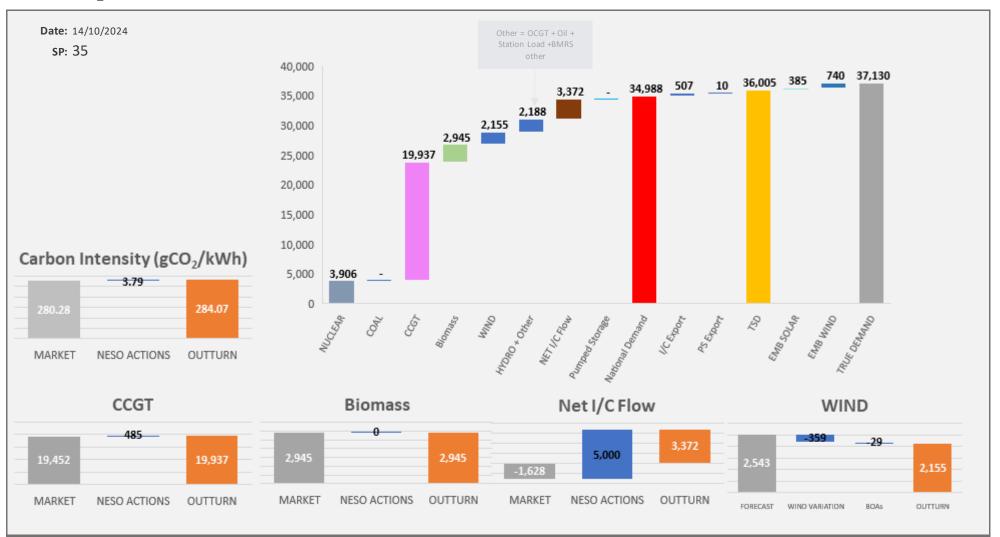
Sum of Thermal Cost

Share of cost



NESO Actions | - Highest SP spend ~ £1.6m Monday 14th October

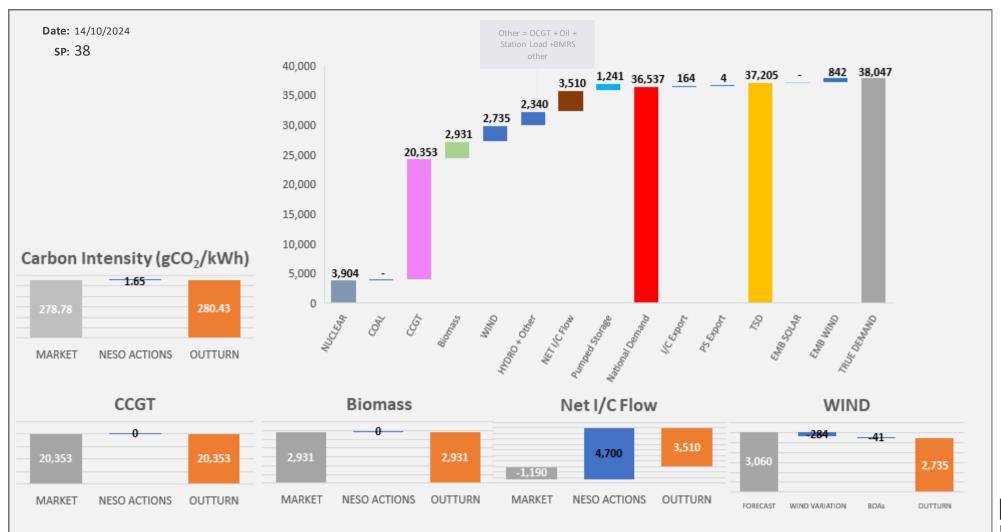






NESO Actions | Peak Demand – SP spend ~ £1.5m Monday 14th October

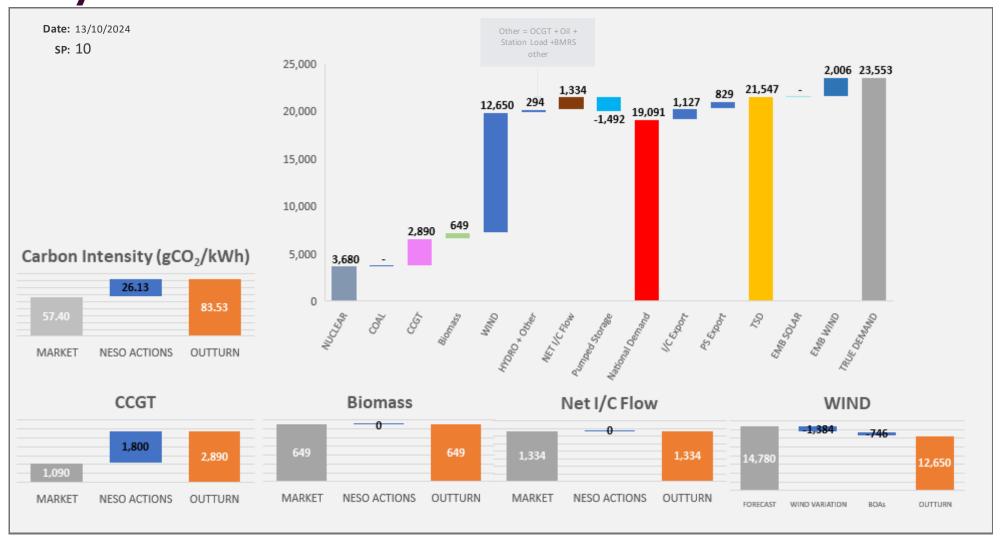






NESO Actions | Minimum Demand – SP spend ~ £189k Sunday 13th October

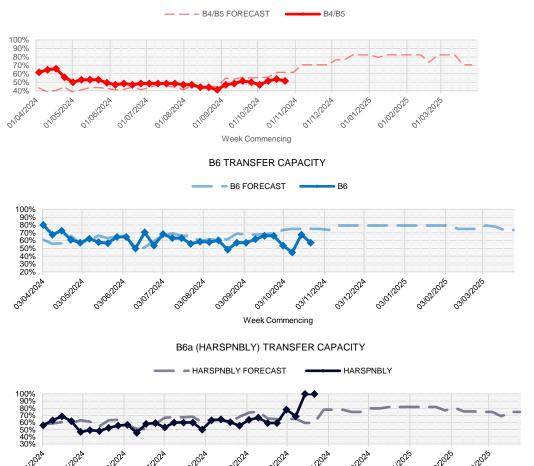
Slido code #OTF





Transparency | Network Congestion





B4/B5 TRANSFER CAPACITY

Boundary	Max. Capacity (MW)	Current Capacity (%)
B4/B5	3400	51%
B6 (SCOTEX)	6800	57%
HARSPNBLY	8000	100%
B7 (SSHARN)	8325	74%
GMSNOW	4700	72%
EC5	5000	100%
LE1 (SEIMP)	8500	70%
B15 (ESTEX)	7500	69%
SC1	7300	100%

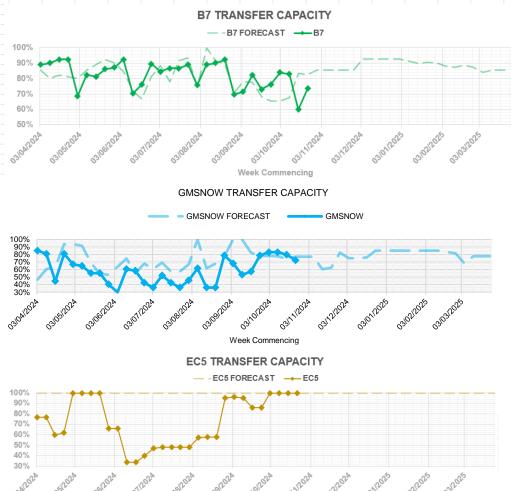


Day ahead flows and limits, and the 24-month constraint limit forecast are published on the ESO Data Portal: Constraints Management

(The forecast and day ahead limits may vary due to changes in the outage plan. The plan is reviewed periodically throughout the year to ensure we are optimising system conditions, whilst managing any necessary outage plan changes)

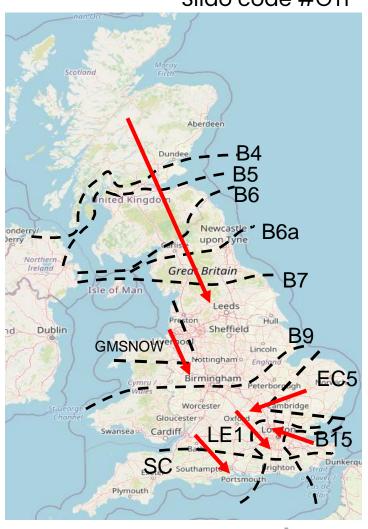


Transparency | Network Congestion



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B4/B5	3400	51%
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EC5	5000	100%
LE1 (SEIMP)	8500	70%
B15 (ESTEX)	7500	69%
SC1	7300	100%





Day ahead flows and limits, and the 24-month constraint limit forecast are published on the ESO Data Portal: Constraints Management

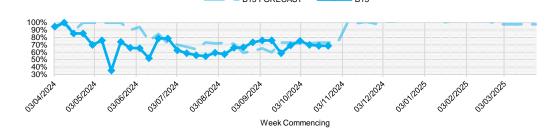
(The forecast and day ahead limits may vary due to changes in the outage plan. The plan is reviewed periodically throughout the year to ensure we are optimising system conditions, whilst managing any necessary outage plan changes)



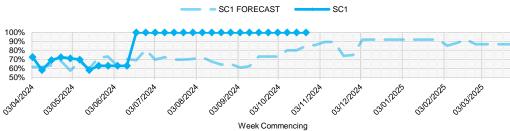
Transparency | Network Congestion



B15 TRANSFER CAPACITY

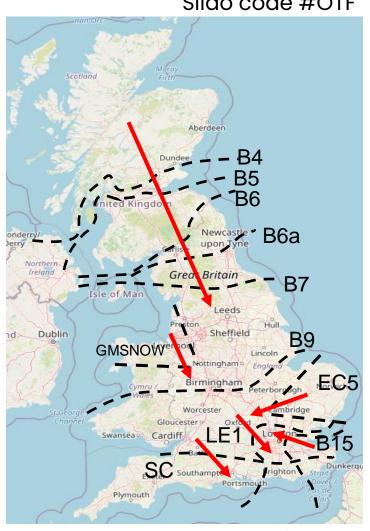


SC1 TRANSFER CAPACITY



Boundary	Max. Capacity (MW)	Current Capacity (%)
B4/B5	3400	51%
B6 (SCOTEX)	6800	57%
HARSPNBLY	8000	100%
B7 (SSHARN)	8325	74%
GMSNOW	4700	72%
EC5	5000	100%
LE1 (SEIMP)	8500	70%
B15 (ESTEX)	7500	69%
SC1	7300	100%

Slido code #OTF



Day ahead flows and limits, and the 24-month constraint limit forecast are published on the ESO Data Portal: Constraints Management

(The forecast and day ahead limits may vary due to changes in the outage plan. The plan is reviewed periodically throughout the year to ensure we are optimising system conditions, whilst managing any necessary outage plan changes)





Q: When can we expect NESO to stop using fluorescent pink for large chunks of text, which is an accessibility issue that has been repeatedly raised?

A: Thank you for your feedback. We have released an updated pack palette for this week's OTF (23.10.2024).





Q: How can I track your progress in terms of carbon report, energy demand and forecast, weather impacts inarticulate zone wise, especially for South West UK, Wales and North zones?

A: There's data updated daily about Electricity demand and forecasts on the Data Portal (demand: https://www.neso.energy/search-data?f%5B0%5D=organization%3A48391).

The history generation mix and carbon intensity is available in https://www.neso.energy/data-portal/historic-generation-mix. For the whole carbon intensity data group with some regional forecast is available at: https://www.neso.energy/data-portal/regional-carbon-intensity-forecast.

Additionally, the link https://www.neso.energy/data-portal/historic-demand-data has a separate "England and Wales demand" but nothing more precise geographically-wise so far.





Q: Could ESO please explain the conditions which mean that only one generating unit is able to respond to localised voltage issues therefore a competitive tender process is not required, noting the wide prevalence of other CCGTs in the London/East Anglia region.

A: For every voltage tender we run, we study the voltage requirements for the specific duration of the contract.

For the current contract, Rye House was the only provider that could meet all our requirements for the forecast scenarios for both pre and post fault conditions. The studies take account of available generation, Transmission Owner outages and reactive asset availability and expected systems flows.

Whilst there are a few generators in the region, post fault (primarily but not exclusively, double circuit faults along the Bicker Fenn-Spalding-Walpole 400kV route), most generators are effectively disconnected from the area of high volts with Rye House most effective for managing the post fault high voltages.





Q: What ancillary services are considered to be part of Applicable Balancing Services Volume Data (ABSVD) for Secondary BMUs at the moment?

A: All the services where ABSVD are applied are detailed within the published ABSVD methodology document (https://www.neso.energy/document/322281/download).

As detailed in the document, in essence:

- 1. If registered as a Primary BM unit, and a tender is submitted for this unit, then ABSVD is applied.
- 2. If registered as a Secondary BM unit, and a tender is submitted for this unit, then ABSVD (even if submitted to Elexon) will not be applied.

This is reviewed annually or as and when new services go live.





Q: The NESO publish market provided inertia (GW.s) on a settlement period basis and we have reviewed this data for 18 months from 1 April 2023 to 30 Sept 2024. The minimum required GB system inertia (from FRCR) was 140GW.s until 19 June 2024 and 120GW.s thereafter. We have calculated that NESO needed to provide additional inertia beyond the market for 32% of that time. From operational data we note that Stability Pathfinders Phase 1 (SPP1) are run close to 100% of the time when available i.e. for 68% of the time when they were not needed for inertia.

Taking the contracted consumption data from the SPP1 tender results (totalling 25.34MW) and using system imbalance prices paid to the SPP1 suppliers, we have calculated that the cost to NESO of running the SPP1 synchronous machines was ~£19M during the 68% of time in the 18 month period when these machines were not required for inertia.

Can the NESO explain why it has been running SPP1 assets when there has been sufficient inertia provided by the market? Is it because the assets are meeting other needs such as the system strength provided by synchronous machines?

A: As well as inertia, the SPPI are used for voltage support and this can be evidenced by reviewing the reactive power data absorbed / provided by each Synchronous Compensator (sync comp) that is published with reactive power data for all other BMUs on the data portal.

For example, the Cruachan, Deeside, Lister Drive, Killingholme and Grain sync comps are well used for reactive power as well as inertia.

The machines can also provide other capabilities such as fault infeed and will be synchronised for this too.





Q: Again, there are MOYLE actions being sent to the market via iris/settlement files (similar to what we had in June/July) since 01.10.2024. Can you please permanently fix this issue and confirm the guidance that these should be completely ignored (i.e. no impact on NIV, no impact on imbalance price)?

A: Our IT team has deployed a fix which has successfully resolved the issue. Our Settlements team will manually correct the erroneous files that were sent out.

Q: Does NESO include Balancing Reserve (BR) cleared volumes into the Derated Margins forecasts?

A: Balancing Reserve assets should declare their availability through normal BM data processes and this will feed into the CM calculation as any other availability on BM units.





Q: Could we have one of your special sessions on how the CMN algorithm works at some stage in the future?

A: Thank you for your feedback. We will add this to the list.

Q: I suspect Lisa's question [What caused the CM Warning to be issued on Monday?] wasn't about the generalities of CMNs but the specific causes on that particular day 14/10. What happened?

A: CMNs are automatically triggered based on the CMN calculation. The key factors leading to the triggering of a CMN on 14 October 2024 were:

- 1. Low wind in Europe causing prices to rise in European markets, leading to exports from GB
- 2. Generator and interconnector outages in GB

The combination of these factors resulted in a calculation of insufficient margin and thus an issuance of the CMN.





Q: Aren't interconnectors supposed to respond to CM events without NESO action?

A: All Capacity Committed CMUs must deliver their ALFCO (Adjusted Load Following Capacity Obligation) in the event of a System Stress Event (SSE), including interconnectors, following a CMN. There are some limited exceptions to this obligation that are detailed in the CM Rules. The CMN makes participants aware there may be an SSE, it does not in itself bring any obligation to respond.

Q: Re. the Capacity Margin Notice (CMN) event on Monday [14/10/24], it seems forecast was only c.200MW short of the 500MW margin to declare a CM event but NESO turned around 5GW of interconnection which seems excessive/ super costly for consumers so was it all needed?

A: CMN is based on derated values. The control room would have had all the operational information available which showed a need for this volume of trading to meet the forecast demand plus reserve requirement. The trading actions that were tendered and executed are considered against our expectation of what alternative actions will be available in operational time scales and what is required based on our forecasts for demand and margin at the time. All trades were taken in merit against this expectation.



Outstanding Questions



Q: How much is the Wider Access API used? In number of BMUs and total MWs if a technology supplier already has an EDL line, what would the advantages be to have the WA API as well?

A: We are still working on this question.



Advance Questions



Q: Hello, on the 9th October OTF in response to a question by Johan Askehave, we were told that the control room may have been running the frequency low "to correct an electric time error so as to ensure any assets relying on the GB system frequency (50Hz) to calculate time remain as accurate as possible". Could you outline in which circumstances the control room may take actions to correct ETE? Is there a threshold on built up ETE that triggers action for example? What corrective actions might be taken to correct this ETE, would running the system as low as 49.8Hz as asked in the OTF question be within bounds for example?

A: Under NESO's electricity licence, we are obligated to keep the electric time error to within ±1:10(min:secs) but it should be kept as close to 0:00 as possible. Also, NESO aims to keep the system frequency within operational limits of ±0.2Hz (49.8-50.2Hz) but as close to 50Hz as possible. As a result, NESO is allowed to drive the frequency to the operational limits should it need to do for any reason, e.g. in order to correct electric time error amongst other reasons. As to how far from 50Hz NESO chooses to drive the frequency to depends on the situation and the operational circumstances.

Example 1, if there is a significant electric time error but system and operational conditions (e.g. the wind/solar forecasts, interconnector flows, demand levels, etc.) are forecast to be stable for several hours, NESO may choose to drive a small increase/decrease in system frequency to gently correct the time error.

Example 2, if there is a significant electric time error and only a short period where system and operational conditions are forecast to be stable, NESO may choose to drive a larger increase/decrease in system frequency to correct the electric time error as much as possible in the short period.

Please note, NESO will never put the GB system frequency at risk in order to correct for electric time error and any driven frequency changes are always carefully assessed and calculated and always encompass a safety margin for any unforeseen operational issues which may occur.



Advance Questions



Q: What is the difference between the boundaries SEIMPS and SEIMPPR23? I understand that SEIMPPR23 is a variation of SEIMPS due to a change in system topology, could you give more detail on this change please - what are the exact changes, why did these changes happen, are there other boundaries resulting from these changes?

A: The boundary variations are determined by a few factors. However, the main two are:

- 1) The many possible outage combinations affecting different assets in the region (overloads)
- 2) For those resulting overloads, the location of the effective generation is also important.

The Naming convention is always subject to change due to outage combinations. With regards to why each individual boundaries are formed (and by extension, different), that would be confidential information because we would have to speak on the outage combinations as well as the specific generation that are effective in on specific overloads which we can't provide.



Reminder about answering questions at the NESO OTF



- Questions from unidentified parties will not be answered live. If you have reasons to remain anonymous to the wider forum, please use the advance question or email options. Details in the appendix to the pack.
- The OTF is not the place to challenge the actions of individual parties (other than the NESO), and we will not comment on these challenges. This type of concern can be reported to the Market Monitoring team at: marketreporting@nationalenergyso.com
- Questions will be answered in the upvoted order whenever possible. We will take questions from further down the list when: the answer is not ready; we need to take the question away or the topic is outside of the scope of the OTF.
- Slido will remain open until 12:00, even when the call closes earlier, to provide the maximum opportunity for you to ask questions.
- All questions will be recorded and published All questions asked through Sli.do will be recorded and published, with answers, in the Operational Transparency Forum Q&A on the webpage: https://www.neso.energy/what-we-do/systems-operations/operational-transparency-forum
- Takeaway questions these questions will be included in the pack for the next OTF, we may ask you to contact us by email in order to clarify or confirm details for the question.
- Out of scope questions will be forwarded to the appropriate NESO expert or team for a direct response. We
 may ask you to contact us by email to ensure we have the correct contact details for the response. These
 questions will not be managed through the OTF, and we are unable to forward questions without correct
 contact details. Information about the OTF purpose and scope can be found in the appendix of this slide pack



slido



Audience Q&A

(i) Start presenting to display the audience questions on this slide.

Slido code #OTF

Feedback

Please remember to use the feedback poll in Sli.do after the event.

We welcome feedback to understand what we are doing well and how we can improve the event for the future.

If you have any questions after the event, please contact the following email address: box.nc.customer@nationalenergyso.com



Appendix



Participation in the Operational Transparency Forum



Thank you to everyone who participates in the OTF, whether you join weekly, monthly, on specific occasions or follow up with the webinar recordings and published slides. We hear from participant feedback and our NESO colleagues that all of us value the opportunity to share information, ask questions and share the answers.

One of the reasons this format works so well is the professional courtesy we see demonstrated every week.

However, in recent weeks there have been some Slido questions and comments in the Q&A session directed at specific market participants suggesting their actions are not appropriate. This is concerning because:

- The statements are being made in a public forum without the opportunity to reply
- The negative comments may impact these businesses directly, or indirectly e.g.: through social media, etc.
- The individuals asking questions could not be traced using the details provided in Slido
- The OTF is not the place to challenge the actions of individual parties (other than the NESO), and we will not comment on these challenges. This type of concern can be reported to the Market Monitoring team at: marketreporting@nationalenergyso.com

Remember, if you have reasons to remain anonymous to the wider forum or have concerns your question may not be one to ask in public, you can use the advance questions or email options.



Purpose and scope of the NESO Operational Transparency Forum



Purpose

The Operational Transparency Forum runs once a week to provide updated information on and insight into the operational challenges faced by the control room in the recent past (1-2 weeks) and short-term future (1-2 weeks). The OTF will also signpost other NESO events, provide deep dives into focus topics, and allow industry to ask questions.

Scope

Aligns with purpose, see examples below:

In Scope of OTF

Material presented i.e.: regular content, deep dives, focus topics NESO operational approach & challenges NESO published data

Out of Scope of OTF

Data owned and/or published by other parties
e.g.: BMRS is published by Elexon
Processes including consultations operated by other
parties e.g.: Elexon, Ofgem, DESNZ
Data owned by other parties
Details of NESO Control Room actions & decision making
Activities & operations of particular market participants
NESO policy & strategic decision making
Formal consultations e.g.: Code Changes,
Business Planning, Market development

Managing questions at the NESO Operational Transparency Forum



- OTF participants can ask questions in the following ways:
 - Live via Slido code #OTF
 - In advance (before 12:00 on Monday) at https://forms.office.com/r/k0AEfKnai3
 - At any time to <u>box.nc.customer@nationalenergyso.com</u>
- All questions asked through Sli.do will be recorded and published, with answers, in the Operational Transparency Forum Q&A on the webpage: <u>Operational Transparency Forum | NESO</u>
- Advance questions will be included, with answers, in the slide pack for the next OTF and published in the OTF Q&A as above.
- **Email questions** which specifically request inclusion in the OTF will be treated as Advance questions, otherwise we will only reply direct to the sender.
- **Takeaway questions** we may ask you to contact us by email in order to clarify or confirm details for the question.
- Out of scope questions will be forwarded to the appropriate NESO expert or team for a direct response. We may ask you to contact us by email to ensure we have the correct contact details for the response. These questions will not be managed through the OTF, and we are unable to forward questions without correct contact details. Information about the OTF purpose and scope can found in the appendix of this slide pack.

NESO Information Request Statement



The Energy Act 2023 and the power to request information.

Section 172 of The Energy Act 2023 provides NESO, as the Independent System Operator and Planner, with the power to require information, from anyone carrying out a relevant activity, to allow it to carry out any of its functions. This power will come into effect once NESO is operational.

In advance of this we are consulting on what the Information Request Statement will contain and what an Information Request issued by NESO may look like.

The Information Request Statement and Notice.

The Statement will be available on our website and will contain sections on why a request has been issued, the process of responding to a request, what happens if a recipient does not provide the information and how we will manage any data provided. A draft template of an Information Request Notice is also shared on our website.

The Consultation

We are running a consultation from **May 3rd to May 31st** which can be found at https://www.neso.energy/about/operational-information/information-request-statement-consultation and would welcome feedback from across industry to make sure we develop a statement which is clear and accessible.

Following the consultation period Ofgem will determine if the draft Statement is approved or if any changes are necessary.

