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## Code Administrator Consultation Response Proforma

### GSR033: Code Maintenance

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@nationalenergyso.com](mailto:box.sqss@nationalenergyso.com) by **5pm** on **20 February 2025**. 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 [box.sqss@nationalenergyso.com](mailto:box.sqss@nationalenergyso.com)

Respondent details	Please enter your details	
<b>Respondent name:</b>	Alan Creighton	
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<b>Email address:</b>	Alan.creighton@northernpowergrid.com	
<b>Phone number:</b>	07850 015515	
<b>Which best describes your organisation?</b>	<input type="checkbox"/> Consumer body <input type="checkbox"/> Demand <input checked="" 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 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** (this will be shared with industry and the Panel for further consideration)

☐ **Confidential** (this will be disclosed to the Authority in full but, unless specified, will not be shared with the Panel or the industry for further consideration)

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**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 Licensees to comply with any relevant obligations under Assimilated law.*

**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?	Mark the Objectives which you believe the proposed solution better facilitates:
		Original <input checked="" type="checkbox"/> i <input type="checkbox"/> ii <input type="checkbox"/> iii <input type="checkbox"/> iv
		Clarifying the governance arrangements should make it easier for stakeholders to propose and progress changes to the SQSS.
		Click or tap here to enter text.
2	Do you support the proposed implementation approach?	<input type="checkbox"/> Yes  <input type="checkbox"/> No
		<p>Northern Powergrid supports the transition of the NETS SQSS to a more open and transparent governance framework as this will bring it into line with other industry code governance arrangements. However, there are some aspects of the proposed legal text that should be clarified. These include:</p> <ol style="list-style-type: none"> <li>1. There is a lack of clarity with respect to the current (baseline) version of the NETS SQSS in force. The version designated on 1 October 2024 appears to be v2.8, but we could only find a marked up copy of v2.8 (marked TBC)</li> </ol>

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		<p>included as Annex 2, that includes the NESO-implementation related changes (designated 1 October 2024) together with some changes that seem to have been drafted after 1 October 2024, which include changes to the definitions relating to Licensees. It is important to establish the baseline version as it is that version which should updated to address the GSR033 defect.</p> <p>2. GSR033 ideally should only introduce those changes associated with implementing the directed governance framework, but in the process of developing the GSR033 legal text, it seems like several issues with the baseline (v2.8 TBC) text and pre-existing issues have been identified. Some of these issues are of a minor editorial nature whilst others, for example the new definition 'Licensee', are more material. There are further 'Licensee' related changes in Annex 1 compared to those in Annex 2. There is a need to decide and be clear about whether the GSR033 changes should:</p> <ul style="list-style-type: none"> <li>i. be limited to those associated with the proposed governance framework and editorial changes (i.e. excluding the proposed changes to the definition of Licensee); or</li> <li>ii. include other issues that have been identified by the SQSS Panel (and any arising from this consultation) including using the proposed new definition of licensee.</li> </ul> <p>Northern Powergrid recognise that there is limited time to resolve all these issues within the timescales that NESO are working to, but our view is that it would be less confusing to all stakeholders to take this opportunity to address all identified and relevant issues now, rather than to recommend to Ofgem that they approve a version of SQSS with known outstanding issues,</p>
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		<p>which will need to be addressed in a subsequent modification.</p> <p>3. There is a need to clarify which licensees have an obligation to maintain the NETS SQSS. Our understanding is that it is only the ESO Licence that requires NESO to ‘establish and operate procedures for the modification of the SQSS’ (ESO Licence Condition E7.15) – the text in J.4.1.1 suggest other parties also have an obligation to maintain the SQSS.</p>
3	Do you have any other comments?	<p>Northern Powergrid has provided comments on versions of the pre-consultation legal text, some of which have been incorporated and others which have been recorded in Annex 6. We would like our outstanding comments, as listed in Annex 6, to be considered to be an integral part of our consultation response.</p> <p>We have provided some additional comments embedded in the attached version of the draft legal text.</p> <p>As mentioned above, we think that either: i) no changes should be made to the definitions of Licensee (on the basis that they are outside the scope of GSR033), or ii) there should be further consideration of replacing the terms ESO Licensee and Transmission Licensee with generic term ‘Licensee’. We recognise that there is a view that the use of a generic term ‘Licensee’ works, but we are of the view that using separate terms provides clarity to stakeholders of the role of each party.</p>