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System Operation Guideline (SOGL) Entry into Force Compliance

Open Letter to Stakeholders Confirming Day One Compliance for SOGL

Dear Industry Colleagues

SOGL was formally adopted on 2nd August 2017 and was published in the Official Journal of the European Union on 25th August 2017.

GB is obligated to comply with the Entry into Force Requirements 20 days after the publication of the Guideline – 14th September 2017.

In 2016, National Grid instituted a Workgroup, GC0095, dedicated to understanding SOGL. With help from various industry members within the Workgroup, a Code Map was created which analysed every clause of SOGL and identified current GB legislation or practices that either satisfied SOGL requirements or needed to be amended.

Through the code mapping undertaken as part of GC0095, NGET (in its role as System Operator) identified a number of changes required post Entry into Force Day one, however for Entry into Force Day one we determined that no changes were required by NGET. This was reaffirmed when Ofgem released their TSO Allocation Document, identifying which parties are affected by each clause in SOGL.

In addition NGET has also been undertaking work with Ofgem to ensure the Code Map is clear and correct. Furthermore, as most of the requirements are satisfied via NGET's current business practices, NGET has been evidencing and explaining these procedures to Ofgem in the interest of full transparency and compliance. In the coming weeks, NGET will also be adding a clause to each relevant business process document (those identified as being necessary for compliance) requiring that proposed changes include SOGL compliance as part of the assessment.

The actions outlined above support our position that our current processes are sufficient to be compliant with SOGL on 14th September 2017 and that the further actions identified as being required post Entry into Force day one will be undertaken via existing code governance processes.

Yours sincerely

Fergus Healy
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