National Grid ESO
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nationalgridESO

# Scottish and Southern Electricity Network ODFM Terms and Conditions Consultation – UKPN Response

| No | Question | Scottish and Southern Electricity Networks response | NGESO comments |
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| 1 | Do you agree with the approach taken in the proposal?<br>Please provide rationale. | On the basis that the current ODFM proposal is in place on a temporary basis (i.e. until 31st August 2020), we have no material concerns. | The need for an optional service was judged as likely until at least end August, and possibly into September which is why the ODFM service terms cease on 31st August with a clause to extend by one month if required.<br>Feedback from the market has highlighted the inconsistency in the ODFM and Grid Code change approaches and as a prudent system operator we agree that it is appropriate for the ODFM terms to mirror the cease date of GC0143.<br>As such, the terms will be extended until 25th October 2020. As this is an optional service, providers who do not wish to offer their service beyond 31st August can opt out by no longer offering their availability into this service after such time. |
| 2 | Do you have any comments on the proposal letter? | Please see response to item 4. | |
| 3 | **Annex 1**: Do you have any comments on the highlighted mapping for ODFM service? | Please see response to item 4. | |

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| 4 | Do you have any other comments in relation to the proposal? | a) It is essential that Service Providers are aware of their obligation to meet the requirements of all agreements which they are party to, and ensure they avoid any conflicts. Clarity regarding this is important within the proposal and otherwise.<br>b) It is essential that Service Providers understand the difference between constraints for wider system balancing requirements and constraints for operational purposes. Clarity regarding this is important within the proposal and otherwise.<br>c) Regarding the sharing of information; compliance with GDPR requirements is essential in the approach.<br>d) SSEN (SEPD and SHEPD) remains keen to be involved in this area, particularly the creation and development of any future enduring mechanism. | We understand that there is a need to ensure that all stakeholders are aware of requirements surrounding the provision of services to the ESO and would welcome any additional feedback on how to improve clarity on this through further engagement for a future solution.<br><br>ESO has policies and procedures in place to manage personal data it receives or holds in accordance with the GDPR requirements. Personal data is not being shared, exchanged or disclosed outside of ESO in the context of the ODFM service. |