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Dear Graham,

Consultation: Update to the Transmission Constraint Licence Condition Guidance

We welcome the opportunity to provide feedback on the draft Transmission Constraint Licence Condition (TCLC) updated guidance.

The draft updated guidance is generally welcome and appears to be logical and justified. The modifications incorporated progress beyond the 2017 published guidance, aligning with more recent developments in the market. Updating the guidance ensures the document's relevance going forward, including expanding on elements such as the history of TCLC, the Inflexible Offers Licence Condition (IOLC) and REMIT, and providing additional clarity around the expectations of Ofgem regarding compliance.

The supplemental detail provided by Ofgem in the draft guidance helps clarify its approach to the assessment of excessiveness. Additionally, the example table of costs and benefits from being bid down is another welcome addition, providing a list of examples that are reflective of different generation types.

We would recommend that the guidance document is reviewed more regularly going forward, to ensure that it continues to remain relevant and in date.

Yours sincerely,



Richard Sweet
Director of Regulatory Policy