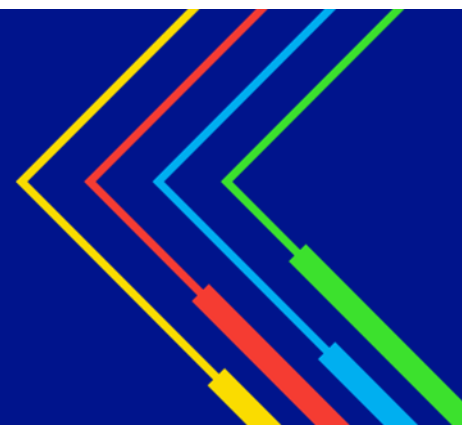


Consultation on energy code reform: implementation consultation

National Grid plc response



National Grid Group's operations in the UK include: National Grid Electricity Transmission (NGET), which owns the high voltage transmission system in England and Wales; National Grid Electricity Distribution (NGED - formerly Western Power Distribution), which owns and operates electricity distribution networks in the Midlands, the South West and Wales; National Grid Ventures (NGV), which owns and operates energy businesses in competitive markets, including sub-sea electricity interconnectors; and National Grid Electricity System Operator (NGESO), a legally separate business within National Grid Group which balances the supply and demand of electricity in real time across Great Britain.

This response to Ofgem's "Energy Code Reform: implementation consultation" dated 30 January 2024 (the Consultation) is from National Grid plc (NG), incorporating the perspective of National Grid Electricity Transmission plc (NGET) - our electricity transmission business, National Grid Ventures (NGV) - our electricity interconnector business, and National Grid Electricity Distribution (NGED) - our electricity distribution business. It does not cover the separate National Grid Electricity System Operator (ESO) business.

Executive Summary

We welcome this Consultation and are pleased to see Ofgem providing more details on its Energy Code Reform (ECR) proposals, which seek to implement the powers granted to it in the Energy Act 2023 in relation to the governance of gas and electricity industry codes.

The importance of swift delivery of ECR cannot be understated, given that the codes help facilitate implementation of future energy policy in a coordinated way. As the gas and electricity markets continue to evolve rapidly, we agree the codes and their associated governance also need to evolve to support the efficient and effective delivery of strategic change into the future. The code framework should seek to facilitate transparency, reduce complexity/fragmentation for current and future market participants and reduce barriers to effective compliance, competition, and innovation.

We support ECR as a vehicle for delivering these benefits now otherwise this could be a missed opportunity for the energy sector. Codes cannot and should not become a blocker to progress we must deliver as an industry. It is clear that Ofgem and Government recognise the need to transform the regulatory and policy landscape to enable the decarbonisation of the energy system in a way which protects consumers, and it is important that this shared commitment is translated in the code governance processes to ensure the detailed rules do not undermine the commitment to change.

We are broadly supportive of Ofgem's proposals set out in this Consultation, and we look forward to continued engagement with Ofgem on ECR design principles and implementation.

Our specific responses to the questions raised in this Consultation are set out in the remainder of this document, but our key messages are summarised here:

- For the code reform framework and process to be successful it will be important that it delivers against the objectives of reducing complexity, providing transparency, and streamlining processes.
- We are supportive of code streamlining and consolidation, but this should not be undertaken for its own sake. The existing complexity and nature of certain codes were well considered before preferred solutions were carried forward. Code consolidation must also deliver timely outcomes and not lead to wider uncertainty or prevent the delivery on key strategic energy policy targets such as Net Zero.
- We agree that the role and requirements of stakeholders is vital in shaping the strategic direction and delivery of outcomes under ECR. We are keen to ensure the voice of the network owners is well-represented and acknowledged by Ofgem and future Code Managers as part of the code reform delivery and prioritisation across both Transmission and Distribution.

- We support the proposal for stronger delivery focus provided by appointed Code Managers. It is essential that the appointed Code Managers have the necessary skills and expertise to deliver code reform. In instances where they may not have the necessary level of expertise (eg. networks understanding), they should make necessary arrangements above and beyond the proposed Stakeholder Advisory Forums (SAFs) to consult directly with relevant stakeholders.
- We think that applying consistent and aligned code objectives (factoring the full breadth of potential impacts of modifications) to existing codes is a quick win to support the objectives of ECR. As with Ofgem's statutory duties themselves, where we believe they need to be complemented with a targeted and prioritised set of objectives through the Strategy and Policy Statement (SPS), the Strategic Direction Statement (SDS) needs to be similarly clear if it is to achieve the objectives of aligning Code Managers to the overall sector priorities.
- As a regulated network company, National Grid and its constituent licensed businesses must comply with relevant licence conditions to ensure that the network or regulated asset is operated in a safe and resilient way. It is important that the ECR outcomes do not create additional complexity in discharging these obligations. These requirements should be acknowledged appropriately by Code Managers as part of their role, as well as with the development of the proposed SDS and SAFs.
- It is important that the timelines for all ECR activities are reviewed and considered alongside all reforms currently in flight which will also require code modification(s), such as the review of electricity market arrangements (REMA), and Market-wide Half Hourly Settlement (MHHS). We would welcome a full timeline from Ofgem, providing a holistic view of possible interactions between other reforms and the ECR.
- We think that an immediate review and reform of the Security and Quality of Supply Standard (SQSS) is an important next step alongside any further code reform activities, otherwise this could create future compliance risk for industry parties as other reforms continue at pace (such as the Transitional Centralised Strategic Plan (tCSNP), and the Strategic Spatial Energy Plan (SSEP) etc).
- We agree that the detail included in the SDS should align with the Department for Energy Security and Net Zero (DESNZ)'s annual SPS. We would welcome clarity on how this will be achieved as well as how they might interact. In line with our response on the recent Government SPS consultation, we consider that to have the maximum impact the SDS should adopt a more focussed and prioritised approach than in the SPS recently designated by the Secretary of State.

Below are our responses to the specific questions set out in this Consultation. We would welcome a more detailed discussion and look forward to further engagement with Ofgem on ECR proposals (including the new code modification process).

Designation

Q1. Do you agree that we should recommend to the Secretary of State that the 11 industry codes listed (including the SQSS) should be designated as “qualifying documents” for the purposes of using our transitional powers in the Energy Act 2023 to deliver energy code reform?

We are supportive of the 11 Industry Codes listed as “qualifying documents” to be designated, in the interests of simplifying the code landscape. Furthermore, we agree with Ofgem’s proposal to add a licence condition for the ESO to maintain the SQSS which was not originally set out as an industry code.

We agree that by not pursuing code reform now this could be a missed opportunity to reduce complexity and fragmentation.

Q2. Do you agree that we should recommend to the Secretary of State that the 5 central systems listed (including the Central Switching Service) should be designated as “qualifying central systems” for the purposes of using our transitional powers in the Energy Act 2023 to deliver energy code reform?

We are supportive of the 5 central systems listed being designated as “qualifying central systems.” Ofgem must continue with industry engagement on directions toward a central system ensuring changes are consulted upon and implemented accordingly.

Code Consolidation

Q3. Do you agree with the monetised costs and benefits set out in the accompanying draft impact assessment (i.e. the quantitative analysis)? Please specify if you think there is any further evidence that we should consider.

We generally understand the logic around how costs and benefits are derived. From a practical point of view, it makes sense that consolidation will help market participants understand what provisions apply to them within each code and remove real or perceived barriers to entry. However, we are unclear on the assumptions used which could over/under-state the proposed benefits of consolidation and would welcome further clarity on this.

Q4. Do you agree with the hard-to-monetise costs and benefits set out in the draft impact assessment (i.e. the qualitative analysis)? Please specify if you think there is any further evidence that we should consider.

We agree that it makes sense to consolidate codes as this will help market participants understand what provisions apply to them within each code and remove real or perceived barriers to entry. We would welcome further transparency around how assumptions in the draft impact assessment have been made in the analysis which can have significant impacts on the outcomes of the modelling.

From a practical point of view, the amount of time, resource and the complexities required to achieve code consolidation should not be understated. It is also important to ensure that the newly appointed Code Managers are able to effectively and efficiently manage consolidated codes from a practical/logistical point of view in order to realise the hard-to-monetise benefits, as the consolidated codes will be large.

We also think Code Managers should be held accountable on their delivery and that appropriate tools should be developed to address poor performance. We note that this will be addressed in a future consultation as referenced in the Code Manager Licensing and Secondary Legislation consultation.¹

Q5. Do you agree with our preferred option to consolidate the CUSC and DCUSA to form a unified electricity commercial code?

We are supportive of the principles for code consolidation on the basis that it is delivered with a clear strategy for rationalisation in the long-term.

We agree with the high-level option to create a unified electricity commercial code for CUSC and DCUSA; this recognises the growing coalescence between Transmission and Distribution. However, this will initially result in a very large code. It will need to be ensured that the Code Manager is able to manage this with appropriate skills and resourcing whilst demonstrating expertise across both Transmission and Distribution.

We think that if consolidation is performed in the correct way, ensuring current sections / obligations we are required to adhere to remain intact, this could make for a better document. We welcome the opportunity to feed-back on developments as part of the implementation phase.

Q6. Do you agree with our preferred option to consolidate the Grid Code, STC, SQSS and Distribution Code to form a unified electricity technical code?

We are broadly supportive of code consolidation as part of the wider activities of ECR. In the longer-term, we appreciate that simplification and rationalisation of existing provisions which are duplicated in both user-facing and networks-facing codes is a sensible objective. The preferred route of consolidation outlined in option 1B (forming a unified technical and commercial code(s)) will be a complex and lengthy process. As per our response to Ofgem's Call for Input (February 2023)², we are concerned about the potential impacts if consolidation is not considered appropriately.

One concern is that the Grid Code is already a complex and lengthy document. Depending on how it is performed, consolidation of a unified technical code could potentially make it larger, add complexity and make it less user friendly. For example, if the consolidation is based on starting afresh with all the original requirements consolidated into a smaller number of new requirements, then the outcome could be a better document. However, if consolidation involves copying and pasting paragraphs from each of the individual documents into a single document, which is typically what has been done to the existing Grid Code when adding new requirements for new types of users, the consolidated

¹ [https://urldefense.com/v3/__https://www.gov.uk/government/consultations/energy-code-reform-code-manager-licensing-and-secondary-legislation?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=4700f7a1-e104-4420-927f-ad6305709559&utm_content=immediately__;!!B3hxM_NYsQ!1vAhhLq4SxnbU2b-mDv-VXHJ5gxRqi1IFBO4AfcizL20BLKiDQb61ZvHgeFQl6wtoKEMx9F00OlnazPr5y3GgKnGTG4ZlwyiFsxM-28\\$](https://urldefense.com/v3/__https://www.gov.uk/government/consultations/energy-code-reform-code-manager-licensing-and-secondary-legislation?utm_medium=email&utm_campaign=govuk-notifications-topic&utm_source=4700f7a1-e104-4420-927f-ad6305709559&utm_content=immediately__;!!B3hxM_NYsQ!1vAhhLq4SxnbU2b-mDv-VXHJ5gxRqi1IFBO4AfcizL20BLKiDQb61ZvHgeFQl6wtoKEMx9F00OlnazPr5y3GgKnGTG4ZlwyiFsxM-28$)

² [Call for Input \(ofgem.gov.uk\)](https://www.ofgem.gov.uk/call-for-input)

document will be even larger and more difficult to navigate than the original documents. We are ready to support Ofgem to undertake this exercise in a value-adding way and to avoid the above risk.

The STC covers a broad range of operational processes which are both technical and commercial in nature, with a number of sections/procedures containing a combination of both. As such, Ofgem's preferred option to consolidate would necessitate a split of the STC provisions before consolidation can be achieved. To illustrate this, in **Annex 1** we have mapped the relevant sections and procedures of the STC to show those containing technical provisions, commercial provisions or both.

We think that a split of the STC could be disruptive and could lead to unforeseen consequences, especially for the ESO which relies on the STC to back-off its obligations to Users in other codes like Grid Code and CUSC. This situation may also result in transmission licensees needing to refer to multiple codes to discharge the entirety of their statutory and licence obligations, rather than just one (as per the status quo).

To help mitigate the above concerns and to consolidate the STC (aside from excluding it from consolidation entirely) we think that there should be:

- 1) A plan agreed with STC parties to successfully unbundle the code's technical and commercial provisions without negatively impacting the network licensee's successful delivery of its statutory and licence obligations, including consideration of how this impacts formation of SAFs.
- 2) A comprehensive strategy developed by Ofgem, relevant Code Managers and relevant code parties for successful rationalisation of the electricity code provisions, which can be used as a vehicle to consolidate the STC in a unified technical code.

Q7. Do you agree with our preferred option to consolidate the UNC and IGT UNC to form a new unified gas network code?

We have not responded to this question.

Q8. Do you agree with our proposals to rationalise the identified code provisions as part of any consolidation exercise?

We agree with the proposals to rationalise the identified code provisions. This will help with the aims of the ECR to simplify processes for Code Managers and for market participants. We think that having separate code modification processes between consolidated codes may be confusing for industry and create complexity and create barriers to entry which should be avoided.

Strategic Direction

Q9. Do you agree with our proposal to publish the first SDS for all codes next year (before code managers are in place)?

We agree with the proposal to publish the SDS in advance of the appointment of Code Manager(s). This would help to establish the objectives of the SDS and to test the associated consultation process with industry.

We think that industry benefits from Ofgem's strategic insight on code matters more generally. The SDS (appropriately informed by Government's SPS) will help with prioritisation of any resultant need to amend the codes to ensure that that code modification delivery plans have a line of sight to government energy policy. In the short term, publishing the SDS early will also help manage expectations for industry participants when they consider raising modifications under the existing governance arrangements prior to further ECR reform implementation.

Q10. Do you have views on the proposed SDS process?

We agree that the detail included in the SDS should align with DESNZ's SPS, including layout and content (such as key priorities, relevant roles and responsibilities and time horizons). We would welcome clarity on how this will be achieved as well as how they might interact. In line with our response on the recent Government SPS consultation, we consider that to have the maximum impact the SDS should adopt a more focussed and prioritised approach than in the SPS recently designated by the Secretary of State.

We are supportive of Ofgem's intent to host industry workshops (and associated consultation) to support the development of the SDS in its development phase. The role of stakeholders is vital in shaping the development and

operation of the codes and we are keen to understand how the voice of networks can be adequately represented and heard in the development of the SDS as well as by Code Managers in their facilitation of delivery of the priorities in the SDS.

We support the proposal for annual consultation on each SDS and responses published for transparency. We would welcome clarity around what might happen if industry parties disagree with the assumptions made when establishing the SDS and how these might be addressed. In particular, how Ofgem will justify why they have made certain decisions based on industry input and consideration(s) during the consultation phase.

We would also welcome further clarity on how the SDS will interact with existing code governance arrangements, including the role of panels, prior to the appointment of Code Managers. For example, the level of oversight that Ofgem will provide to ensure Code Administrators and industry follow the SDS without the enforcement powers that would be in place once Code Managers are appointed.

Once implemented, we support the need for Code Managers to monitor and report on delivery plans against the SDS so long as this does not impede the timely delivery of outcomes against key strategic energy policy targets (such as Net Zero).

We note that the Consultation states that Ofgem will be able to build on earlier version(s) of the SDS as transition progresses. We would welcome further clarity on how often Ofgem think the SDS will change within a year and what the change process would be.

We would welcome the opportunity to talk through our thoughts on the draft SDS in more detail and look forward to the SDS being finalised and implemented in due course.

Q11. Do you agree with our proposal that a principles-based standard condition for gas and electricity licensees would support the development and delivery of code modifications related to the SDS?

We agree with the proposal to include a standard licence condition to support the development and delivery of code modifications related to the SDS. We welcome the proposed consultation referenced in section 4.28 to understand more about the obligations and have the opportunity to comment on any proposed drafting. We already participate in code modification forums with the aim of providing valuable knowledge, experience and expertise to support these discussions.

We think it would also be useful to establish resources and guidance around the codes and associated processes to ensure that all licensees are able to engage efficiently, reducing barriers to entry.

Code governance arrangements

Q12. Do you agree with our preferred option for how a Stakeholder Advisory Forum should be constituted?

We are pleased that Ofgem has acknowledged the importance of stakeholders' views being heard and understood as part of wider ECR.

We understand from a meeting with Ofgem on 19th March 2024 that specialist sub-groups and/or other technical steering groups could be established (or retained) to support and complement the SAF process and Code Managers. We support the addition of the SAF and the complementary role it will have in supporting the Code Managers so long as it provides benefits over and above the existing code governance arrangements and is not duplicative. We would welcome additional clarity on how the SAF will interact with these groups.

We understand the logic of having a combination of mandatory and open attendance and support option 3 ("fixed/impartial membership"). It is vital that if Code Managers are basing their recommendations on the steer provided by SAF members, the SAF membership should comprise of appropriate industry representatives with the necessary skills and expertise across both the commercial and technical landscape (as well as a consumer voice). It is important that Code Managers can prioritise discussions with various attendees.

We would welcome clarity over how SAF membership will be determined to ensure there is the appropriate level of representation across the industry at the start, to avoid additional forums being set up to counter-balance potential lack of skills and expertise.

The SAFs must ensure that Code Managers are able to balance consideration of Users as well as Networks as the codes continue to discharge their respective code objectives. Alongside addressing any user-facing concerns, the codes must also continue to facilitate the discharge of Networks' statutory duties to develop and maintain an efficient, co-ordinated and economical system and so enable economic and efficient network planning/investment and other critical network functions. Ensuring a safe energy system must remain a fundamental element of our energy system and a constant priority and outcome for all parties to achieve.

While stakeholder engagement as part of the process is an important element, we consider the new arrangements under ECR with a more proactive role for Code Managers has the potential to enable the code governance processes to focus on those topics of greatest relevance to support overall positive consumer outcomes and delivery of the priorities in the SDS, as opposed to topics which may be of particular interest to individual stakeholder communities. We consider that Ofgem should continue to ensure these benefits are being realised under the reformed processes.

We would also welcome clarity around what would happen if the Code Manager does not recommend the views of the SAF and similarly, what would happen if Ofgem disagree with the Code Manager as part of its current role in giving final approval on code modifications.

Q13. What are your views on i) a requirement to assess the greenhouse gas impact of code modifications with updated guidance, or, ii) introducing a 'net zero' code objective?

We support both (i) and (ii). Both will help deliver towards our national net zero ambitions, but option (ii) could be a better option as it would align to Ofgem's new objective and duty on net-zero. The existing codes have objectives which could be common to all under the overarching framework, such as net zero, security of the system etc.

In our view, it is vital that proposed modifications across all the codes are assessed by workgroup members and Panel members (at least under current arrangements) in a consistent manner. Therefore, we think that consolidated and consistent code objectives should be established at the earliest opportunity prior to the end of the transition period. A common set of objectives would also ensure consistent assessment of change impacts. These should factor in core strategic outcomes such as net zero, but should also consider other matters such as:

- Efficient delivery of related licensee obligations via the appropriate licence(s).
- System security, quality of supply, and safe operation or use of the electricity/gas system.
- Market competition in the supply or generation of energy, including accessibility for new entrants.
- Facilitating the transition to net zero and support of decarbonisation of energy systems.
- End consumers, particularly consumer bills.
- Efficiency or accessibility of the code itself and/or relevant supporting arrangements.
- Compliance with relevant energy regulation or government policy, and/or any relevant legally binding decisions from regulatory bodies.

We think that applying consistent and aligned code objectives (factoring the full breadth of potential impacts of modifications) to existing codes is a quick win to support the objectives of ECR. As with Ofgem's statutory duties themselves, where we believe they need to be complemented with a targeted and prioritised set of objectives through the SPS, the SDS needs to be similarly clear if it is to achieve the objectives of aligning Code Managers to the overall sector priorities.

Q14. Do you agree with our proposal to extend and harmonise the ability of code panels to prioritise the assessment of code modification proposals?

Yes. We think there is merit in implementing consistent prioritisation criteria to allow for work to continue at pace and facilitate a smooth transition until the SDS is established and Code Managers appointed.

Having different processes across the codes may add complexity for users and could present a barrier to engagement. We agree that there may need to be criteria set out so that code modifications outside of the SDS can also be prioritised considering the wider landscape of reform. Whilst it may not be appropriate for all change to be initiated in the same manner, there should be guiding principles outlined which will enhance engagement priorities.

We would welcome clarity on whether the same prioritisation criteria would apply once Code Managers are appointed and, if not, how the process for review and implementation of amended criteria will be consulted on and agreed.

We look forward to contributing to the proposed Modification Process Workgroup to discuss how to align prioritisation criteria across codes.

Transition

Q15. Do you agree with our proposal to adopt a phased approach to transitioning codes to the new governance model?

We agree with Ofgem's preferred option to adopt a phased approach to transitioning codes to the new governance model as it will allow for lessons to be learnt, enables a smoother transition between implementation phases and will allow code parties to resource themselves accordingly.

Q16. Do you identify any strategic or operational considerations that might inform the transition sequence?

We understand that the SDS will eventually set the strategic direction of the codes, and so the strategic direction during the transition sequence should be mindful of this ongoing long-term process.

We note that a number of considerations have been noted in the Consultation that could impact the delivery of code changes, such as the creation of the Future System Operator (FSO), the review of electricity market arrangements (REMA), and Market-wide Half Hourly Settlement (MHHS) which will also require code modifications. As the transition phase is time limited, we would welcome a full timeline from Ofgem which provides a holistic view of possible interactions with the Strategic Code Reviews (SCRs) currently in flight so that we can understand the operational impacts. For example, the proposed "phase 1" delivery outlined in this Consultation will impact the REC and BSC in early 2026, though these codes are responsible for the Qualification and assurance of MHHS due for completion in December 2026. Whilst the codes may not need to be amended as part of the ECR, this is one example of where there is a risk of potential overlap.

From a practical perspective, Code Managers will need to be able to adapt quickly to these developments and industry will need to plan resource accordingly to facilitate the transition sequence.

Q17. What are your views on our proposed transition sequencing?

See response to Q16. We broadly agree with the proposed transition sequencing, but the implementation of changes is complex and will take time. The transition sequencing allows for the easier implementation first – although if this has impacts to MHHS, this should be reviewed.

It may be worth exploring the possibility to transitioning to a unified commercial and technical code for gas first and then for electricity. This could help ensure that all technical and commercial aspects are covered per energy type in the first instance rather than attempting both at the same time.

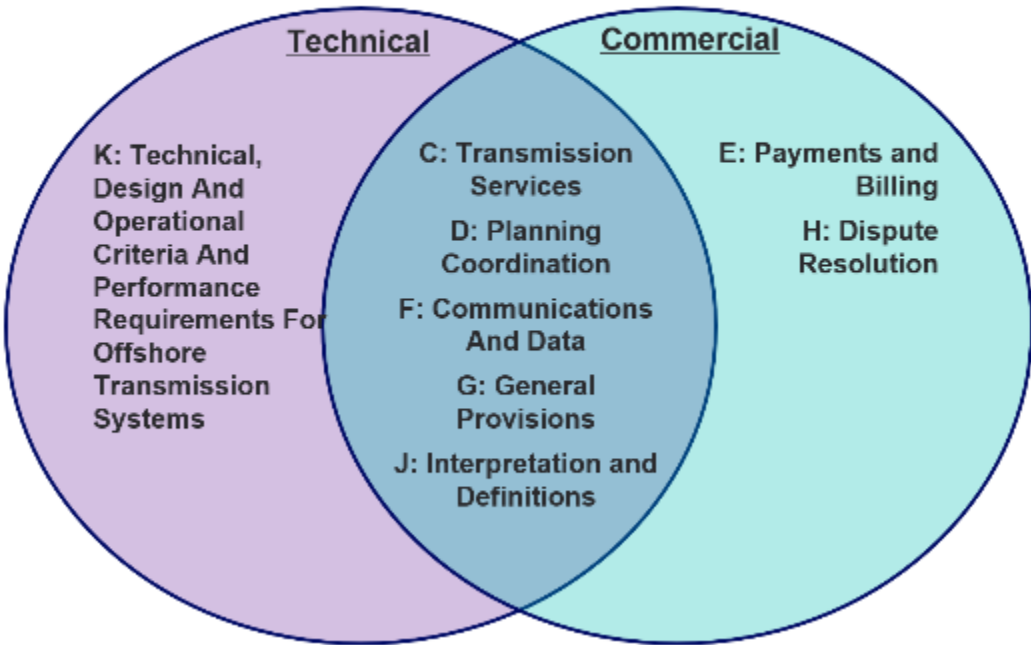
Q18. Do you have any other comments on how Ofgem should approach the implementation and transition process?

See response to Q16 and Q17.

Annex 1

STC mapping to illustrate how the relevant sections and procedures of the STC contain provisions relating to either technical, commercial or both.

STC Main Body Section Mapping



STC Procedure Section Mapping

Technical	28	STCP Ref	Name	Tech v Comm
Commercial	14	STCP01-1	Operational Switching	Technical
Both	12	STCP02-1	Alarm & Event Management	Technical
		STCP03-1	Post Event Analysis & Reporting	Technical
		STCP04-1	Real Time Data Change Management	Technical
		STCP04-2	Real Time DataLink Management	Technical
		STCP04-3	Real Time Data Provision	Technical
		STCP04-4	Provision of Asset Operational Information	Technical
		STCP04-5	Operational Telephony	Technical
		STCP04-6	Offshore DataLink Functional Spec for Telecontrol Communication Interface	Technical
		STCP06-1	Black Start	Technical
		STCP06-2	De-synchronised Island Management	Technical
		STCP06-3	System Incident Management	Technical
		STCP06-4	Contingency Arrangements	Technical
		STCP08-1	Protection Testing	Technical
		STCP08-2	Circuit Live Trip & DAR Tests	Technical
		STCP08-3	Operational Tests and System Tests	Technical
		STCP08-4	User Tests	Technical
		STCP09-1	Safety Co-ordination Between Parties	Technical
		STCP09-2	Public and Site Safety	Technical
		STCP10-1	Asset Nomenclature	Technical
		STCP11-1	Outage Planning	Technical
		STCP11-2	Outage Data Exchange	Technical
		STCP11-3	TO Outage Change Costing	Technical/Commercial
		STCP11-4	Enhanced Service Provision	Technical/Commercial
		STCP12-1	Data Exchange Mechanism	Technical/Commercial
		STCP13-1	Invoicing & Payment	Commercial
		STCP13-2	SIF & LARF Methodology	Commercial

National Grid

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STC Procedure Section Mapping

Technical	28	STCP Ref	Name	Tech v Comm
Commercial	14	STCP14-1	Data Exchange for Charging Setting	Commercial
Both	12	STCP14-2	Data Requirements for Charging Consultations	Commercial
		STCP14-3	Customer Charging Enquiries	Commercial
		STCP16-1	Investment Planning	Commercial
		STCP17-1	Feasibility Study	Commercial
		STCP18-1	Connection and Modification Application	Technical/Commercial
		STCP18-2	Use of System Application	Technical/Commercial
		STCP18-3	TEC Changes	Technical/Commercial
		STCP18-4	Request for a Statement of Works	Technical/Commercial
		STCP18-6	Variation to Agreements	Technical/Commercial
		STCP18-7	Queue Management Coordination	Commercial
		STCP19-2	Construction Process & Scheme Closure	Technical/Commercial
		STCP19-3	Operational Notification and Compliance Testing	Technical
		STCP19-4	Commissioning and Decommissioning	Technical/Commercial
		STCP19-5	Offshore Transmission Compliance Process & Compliance Testing	Technical
		STCP19-6	Application Fee	Commercial
		STCP20-1	Electricity Ten Year Statement	Technical/Commercial
		STCP21-1	Network Options Assessment	Technical/Commercial
		STCP21-2	Network Asset Risk Metric (NARM) Data	Technical
		STCP22-1	Production of Models for GB System Planning	Technical
		STCP23-1	Offshore Party Entry Process	Commercial
		STCP24-1	Revenue Forecast Information Provision	Commercial
		STCP25-1	Significant Code Review Process	Commercial
		STCP25-2	Send Back Process	Commercial
		STCP25-3	Fast Track Self-Governance Process	Commercial
		STCP26-1	Active Network Management	Technical
		STCP27-1	System Performance Monitoring Requirements	Technical

National Grid

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