

Network Access Policy (NAP)

Transmission Owner details

Effective from 01/04/2021

Contents

1 EXECUTIVE SUMMARY 3

2 REQUIREMENT FOR A NETWORK ACCESS POLICY 5

3 LONG-TERM OUTAGE PLANNING FRAMEWORK 7

4 WITHIN YEAR OUTAGE PLANNING FRAMEWORK 11

5 ENHANCED SERVICE PROVISION 14

6 COMMUNICATION..... 15

7 KEY PERFORMANCE INDICATORS (KPI's)..... 17

APPENDIX A..... 18

1 EXECUTIVE SUMMARY

The Transmission Owner Network Access Policy (NAP) identifies process enhancements for the RIIO-T2 period proposed by the Transmission Owner to the working relationship between the Transmission Owner and National Grid Electricity System Operator (NGESO) above and beyond the baseline level of outage planning, customer service and operation of the GB electricity transmission system as specified in the System Operator Transmission Owner Codes & Procedures. These enhancements are designed to assist NGESO in managing system costs and to deliver added value for consumers. The requirements for the Transmission Owner to have in place a Network Access Policy for RIIO-T2 is detailed in special licence condition 2J of the transmission licence.

As the GB electricity transmission networks continues in RIIO-T2 to facilitates the transition to a zero-carbon network, the Transmission Owner in RIIO-T2 will need to reinforce key parts of our network, connect more renewable generation (onshore & offshore) and modernise & maintain ageing equipment, as well as carrying out other works required to protect the reliability and health of our electricity transmission system. To enable this, it is necessary to switch out parts of the electricity transmission system to carry out the works safely, this de energisation of equipment to carry out work is commonly described as a *planned outage*. Certain *planned outages* can impact the operation of the system and result in constraint costs. This is where generators of electricity are compensated by NGESO for increasing or decreasing their generation output as requested by NGESO. These constraint costs can be substantial and are ultimately passed on to end consumers.

This Network Access Policy sets out what level of service above and beyond the baseline level specified in the System Operator Transmission Owner Codes & Procedures the Transmission Owner will offer to our transmission stakeholders and NGESO. This Network Access Policy also describes how the Transmission Owner and NGESO will collaborate to ensure work on the electricity transmission system is carried out in a manner that takes into account and minimises the impact on consumers, system security and whole system costs whilst considering impact on stakeholders

Specifically, this policy sets out the way the Transmission Owner and NGESO will provide visibility of the RIIO-T2 project plan to our stakeholders, especially the *planned outages* associated with delivering the plan and the impact these *planned outages* will have on system users. This policy will also describe the transparent decision making process associated with any changes to the Transmission Owner baseline plans submitted as part of the planning process.

Key to planned outage delivery is a flexible and collaborative approach taken by the Transmission Owner and NGESO in network outage planning, it's important we also include our customers and stakeholders (e.g. generators, Distribution Network Operators) in this enhanced outage planning process. Frequent and robust communication between parties will enable innovative solutions to network issues to be identified while ensuring optimal and cost effective solutions are achieved for all parties.

This Network Access Policy will indicate the actions and possible enhancements available in both the short-term and long-term to plan and manage network access.

The long-term framework looks forward to a period of one to a minimum of 6 year ahead (beyond year 6 will be reviewed where required). The short-term framework considers work and outages in the current outage planning year (running from 1st April – 31st March of the following year)

The baseline outage planning framework is described in STCP11.1

The Network Access Policy is an ongoing process that will be regularly monitored and reviewed. This will be carried out by the Network Access Policy working group through regular meetings. The Network Access Policy working group is made up of representative from OFGEM, NGENSO and Transmission Owners.

This Network Access Policy will be subject to a formal review every two years and this process will be managed by the Network Access Policy working group.

2 REQUIREMENT FOR A NETWORK ACCESS POLICY

Transmission licence special condition 2J places on the Transmission Owner a number of essential requirements for inclusion in this Network Access Policy, namely;

- a) Details of the actions that the Transmission Owner will take to coordinate with NGENSO and/or other Transmission Owners as appropriate to ensure that planned network outage arrangements are agreed with due consideration of the long-term outcomes for consumers and network users;
- b) Details of the actions that the Transmission Owner will take for the purpose of responding to and managing unplanned network outages with a view to minimising their contribution to network constraints, subject to the need to ensure the safe, secure operation of the National Electricity Transmission System as a whole or any part of it;
- c) Details of the type of circumstances that are likely to require an alternative approach to that set out in relation to the above two paragraphs; and
- d) A description of the Transmission Owner communication and coordination strategy for interacting with NGENSO and any other relevant third parties, including but not limited to Distribution Network Operators and Generators, in respect of matters relating to this Network Access Policy.

The Network Access Policy does not seek to replace the SO-TO Code (STC) or the suite of STC Procedures (STCP's) or other industry arrangements, it's purposes is to support them. It is concerned with whole system outage planning, stakeholder engagement and identifies how the Transmission Owner will assist NGENSO in managing system costs while delivering the Transmission Owner RIIO-T2 business plans.

In meeting the requirements of this policy, the Transmission Owner will seek to ensure that the activities associated with outage planning, network operation and the future development of the Transmission System;

- Are complementary and working together with the System Operator delivers a safe, secure and economic system that benefits all customers and stakeholders,
- And take due consideration of the impact of our RIIO-T2 plans on all customers and stakeholders during the long-term project development framework period of our business plan,
- While utilising an approach during the short-term “within year” planning period that considers the trade-off between the Transmission Owner outage changes and new outage requirements verses NGENSO system security and system cost implications, ensure this process is accountable and transparent.

In this Network Access Policy, the Transmission Owner will;

- Clarify what level of service stakeholders can expect from the Transmission Owner in terms of communication associated with the overall availability of the transmission network, the development and planning of outages in the long and short term planning timeframes and the within year outage change process
- Commit to work with NGENSO to effectively manage the Transmission Owner network access requirements in RIIO-T2 and NGENSO system operation costs.
- Define the enhanced level of service above the baseline (baseline is described in the STCP's) that is acceptable to NGENSO and to our customers and stakeholders. The enhanced level of service proposed and described later will cover the following;
 - The long-term project & outage planning process to ensure stakeholder engagement in the process where applicable
 - Enhanced services offered by the Transmission Owner to NGENSO during RIIO-T2
 - The management and communication of outage changes to the within year outage plan
 - The communication enhanced process between NGENSO, the Transmission Owner and our stakeholders
 - Planning process transparency and KPI's

3 LONG-TERM OUTAGE PLANNING FRAMEWORK

3.1 Overview

As part of our commitment to the Network Access Policy, the Transmission Owner will provide NGESO with visibility of our project plans and system outage requirements up to 6 years ahead of time (for certain projects, system outage requirement beyond 6 years will be provided). This is to ensure NGESO can create a robust and efficient outage plan for each year of RIIO-T2, that also takes into account the impact of outage on the Transmission Owner stakeholders.

The baseline long-term outage planning framework is described in STCP11.1. This section of the Transmission Owner Network Access Policy specifies what enhancements (above the baseline) to the long-term outage planning framework the Transmission Owner will implement in RIIO-T2

The object of this process is to ensure that the Transmission Owner RIIO-T2 business plans are delivered while ensuring NGESO can operate the transmission system in a safe, secure and efficient manner for all system users. To achieve this objective the Transmission Owner commit to carry out the following during the long-term outage planning period;

- All large \ complex capital projects will be developed as far as possible and will have sufficient system outage information submitted to NGESO prior to the start of “Year 2” in the outage planning process as described in STCP11.1
- the Transmission Owner will aim to work with NGESO to identify and deliver “whole system” solutions to any project or outage combination in our RIIO-T2 business plan to help reduce within year system costs that are borne by the end consumer
- the Transmission Owner will, as part of our RIIO-T2 long-term outage planning process review all projects and outage combinations to identify any that will result in our stakeholders being de energised for a period greater than 4 weeks. the Transmission Owner will commit to;
 - Communicate to our stakeholders during the long-term planning process any project and outage combination that will have a detrimental impact on them for a period of greater than 4 weeks as agreed with NGESO
 - Work with NGESO and any stakeholder identified during the long-term planning process as being impacted by a project or outage combination of greater than 4 weeks to develop possible solutions to minimise the impact

3.2 Project \ Outage Prioritisation

The following project and outage categories described below in this Network Access Policy, have been developed to assist the Transmission Owner in creating our long-term outage planning proposals that are submitted to NGENSO during the long-term outage planning process.

- **Agreed Large \ Complex Projects**

These are high priority and \ or complex projects which are mostly the Transmission Owner driven key projects to deliver and maintain an efficient, coordinated and economical transmission system as well as NOA type transmission network reinforcement works which are required by NGENSO to meet the future operational needs of the system. These works are generally large capital projects and tend to be complex, both in design and in delivery and they can have a large impact on system security and system operational costs during the delivery phase. As a result, outages associated with these types of projects will take a priority in our long-term planning process.

- **Outages Affecting Key Boundaries**

Outages on key boundaries associated with the Transmission Owner transmission system can have a serious effect on system operation. Outages of this type can affect system security and generate serious constraint limitations that require to be managed by NGENSO. These outages need to be carefully managed due to the potential clash between the delivery of system reinforcement & modernisation works and the system operational costs incurred by NGENSO and borne by the consumer. As a result, outages affecting key boundaries on the Transmission Owner network will take a priority in our long-term planning process.

- **Long Duration Outages Affecting Key Stakeholders (greater than 4 weeks)**

the Transmission Owner understands the impact long duration outages will have on our key stakeholders (Generators, Distribution Network Operators, etc.). the Transmission Owner will work with NGENSO and our stakeholders to identify, communicate and mitigate were possible outages of this type. As a result, long duration outages affecting key stakeholders on the Transmission Owner network will take a priority in our long-term planning process.

- **Other Outages**

All other outages are those that are not included in the above categories and do not heavily impact the main interconnected transmission system or our stakeholders. These outages are generally of shorter duration and are associated with discrete connection schemes, like for like asset replacement, maintenance, etc. Outages of this type will generally be placed in the long-term plan at the 2 year ahead stage of the process and will be aligned with existing outages of the same asset wherever possible.

3.3 Long-Term Outage Planning Process

- Three – Six Year Ahead Period
The Transmission Owner will develop a high-level view of projects and outages required on our transmission network during this period. At this stage of the long-term planning process the focus will be on the following project and outage types;
 - Agreed large \ complex projects
 - Outages affecting key boundaries
 - Long duration outages affecting key stakeholders (greater than 4 weeks)

During this stage of the long-term planning process NGENO may wish to influence transmission investment by requesting a function design change to a project to provide operational flexibility or to request different delivery timescales or techniques. The Transmission Owner will offer to NGENO an *Enhanced Service Provision* in the long-term planning timeframe, this service is designed to minimise future constraint costs during the delivery phase of the project. The *Enhanced Service Provision* process is described in section 5

We commit to enhanced stakeholder engagement therefore the Transmission Owner will continuously review our long-term outage plans to identify, in conjunction with the ESO, any outage that is greater than 4 weeks and communicate this during this planning timeframe to the relevant stakeholder. the Transmission Owner will commit to working with NGENO and the relevant stakeholder to identify solutions to minimise the impact of long duration outages

- Two Year Ahead
At this stage of the long-term planning process, works associated with the project & outage categories mentioned above will have all known outage requirements submitted to NGENO. At this stage “Other Outages” as specified in section 3.2 are added to the long-term outage planning process. This stage of the process will continue to identify any potential delivery “pinch points” on the network and solutions to overcome them.

The *Enhanced Service Provision* the Transmission Owner will offer to NGENO and our stakeholder engagement commitments stated in the Three – Six year ahead period will also be applicable during this stage of the long-term outage planning process

- Year Ahead
At the year ahead stage, the Transmission Owner and NGENO develop the detailed outage plan. The plan is developed over several months and will be optimised against the critical requirement that the plan should be deliverable in respect to system security and operating cost.

The *Enhanced Service Provision* the Transmission Owner will offer to NGENSO and our stakeholder engagement commitments stated in the Three – Six year ahead period will also be applicable during this stage of the long-term outage planning process where timescales allow.

4 WITHIN YEAR OUTAGE PLANNING FRAMEWORK

4.1 Overview

As part of our commitment to the Network Access Policy, the Transmission Owner will strive to minimise preventable change to the agreed year ahead outage plan during the “within year” delivery period. We commit to only changing the plan due to any of the following;

- Network faults
- Safety related issues
- Defects that affect apparatus ratings or service capability
- Unforeseen project issues
- Unforeseen maintenance requirements
- Positive outage change proposals which benefit stakeholders

The Transmission Owner will also commit to providing as much notice as possible, notice of outages changes to NGENSO and our stakeholders to minimise the impact of any change to them.

The baseline within year outage planning framework is described in STCP11.1. This section of the Transmission Owner Network Access Policy specifies what enhancements (above the baseline) to the within year outage planning framework the Transmission Owner will implement in RII0-T2

4.2 Within Year Outage Prioritisation

The following within year outage categories described below in this Network Access Policy sets out the order and communication timescales to NGENSO and our stakeholders for any new within year outage and/or any change required to a previously agreed year ahead outage

- **Network Fault**
This is when an item of apparatus fails while in service due to a transient or permanent fault. Communication to secure the network will take place between NGENSO and the Transmission Owner in real time and then follow existing planning timescales & processes thereafter. Affected stakeholders will be kept informed throughout.
- **Safety related issues and/or serious asset defects which require prompt intervention**
Outages of this type can require outages on the day or as soon as reasonably practicable. Where possible to do so, communication between NGENSO, the Transmission Owner and relevant stakeholders to agree the outage required will take place in real time and/or during planning timescales. Depending on the issue, immediate action may be required.
- **Projects - outage changes or new within year outages**
For large & complex projects or outages affecting key boundaries, any outage change or requirement for a new outage will be communicated to NGENSO and relevant stakeholders by the Transmission Owner as far ahead as possible.

- Other outages

All other within year outages not included in the above categories and are such that they do not heavily impact the main interconnected transmission system and/or stakeholders shall be offered to NGENSO and our stakeholders with a level of outage flexibility, such that the Transmission Owner will aim to as far as possible program the work with the agreement of NGENSO and stakeholders for a date \ time suitable to them, as well as the Transmission Owner. These outage requests will be submitted as far ahead as possible.

4.3 Within Year Outage Planning Process

The overall aim of the within year outage planning process is to enable the Transmission Owner to deliver our RIIO-T2 commitments while assisting NGENSO in maintaining a safe and secure system, whilst minimising the overall cost of delivering RIIO-T2 to the end consumer. The Transmission Owners commit in RIIO-T2 to enhancing the within year outage planning process where possible by;

- Minimising the number of outage changes and new outage requests submitted to NGENSO within year
- Ensuring any within year outage change, or new outage request, is made to NGENSO and our stakeholders as early as possible.
- Offering a level of outage flexibility to NGENSO and our stakeholders, where practicable, for certain existing \ new outages that require to be taken within year to reduce system constraint costs and minimise the outage impact on our stakeholders
- Enhancing the outage communication process between NGENSO, the Transmission Owner and our stakeholders.
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*Note – Any outage proposal discussion between the Transmission Owner and stakeholders is purely to improve stakeholder engagement and to improve the service provided by the Transmission Owner. NGENSO should be aware of any outage proposal prior to discussion with stakeholders and must not be considered as final until formally notified by NGENSO. All formal outage notifications **must** come from ESO as stipulated in the STCPs as it is only NGENSO who know the full GB system requirements and are therefore the only party able to approve outage changes.*

4.4 Change control

Within year NGENSO or the Transmission Owner may require to make changes to the agreed outage plan and the change may result in increased constraint costs, project delays, additional costs to the Transmission Owner or stakeholder impact. To promote transparency around the approval \ rejection of the changes to the agreed outage plan, when the impact of the change may have a detrimental impact on NGENSO or the Transmission Owner, a within year Outage Change Control document shall be completed, containing as a minimum:

- A summary of the work
- Background from the perspective of the Transmission Owner
- Background from the perspective of NGENSO
- Options and mitigating actions available
- Forecast costs and risks from the Transmission Owner
- Implications and forecasts on overall system expenditure from NGENSO
- Conclusions and recommendations

The within year Outage Change Control document will specify the reason for the change, the impact the change will have on NGENSO and the impact it will have on “Transmission Owner name”. The Outage Change Control document will then identify if the change to the agreed planned outage and/or new outage request can be effectively managed from a system security, system constraint or the Transmission Owner cost view point and if the request is to be approved or rejected by NGENSO.

5 ENHANCED SERVICE PROVISION

As part of the Transmission Owner commitment to this Network Access Policy, the Transmission Owner will offer to NGENSO services that allow NGENSO flexibility, where time allows, in influencing the design, delivery of the project, while ensuring the Transmission Owner is not financially disadvantaged by any change to the original project design and/or delivery method. This process will allow the optimal engineering solutions to be developed by the Transmission Owner during the planning phase, with any extra costs incurred by the Transmission Owner funded by NGENSO using STCP 11.4. This Enhanced Service Provision has been developed to ensure that “whole system costs” are controlled and managed during the RIIO-T2 period for the benefit all stakeholders and consumers. For example, adding assets to a substation design ahead of requirement could reduce system constraint costs by reducing future outage requirements. This would need to be fully justified and certain to make consumer savings.

In RIIO-T2 should NGENSO or the Transmission Owner request a change to the design or delivery of a project, or the Transmission Owner offers an additional service to NGENSO, an Enhanced Service Change Control Document will be created to assess the feasibility of the request. This document will specify the reasons for the change, the benefits the change will have on the wider networks and the costs involved. The costs shall include the Transmission Owner costs for implementing the changes to the scope of a project or for providing additional services, NGENSO shall provide forecasted constraint savings. If NGENSO and the Transmission Owner agree the change is beneficial and should be implemented, the appropriate STCP 11.4 process should then be followed. In this Network Access Policy, the Transmission Owner will commit to offering this Enhanced Service Provision to NGENSO in both the long and short-term outage planning periods, where timescales allow.

The following scenarios are just some that may be considered for inclusion into the Enhanced Service Change Control process that could deliver consumer savings;

- Design changes such as an offline build of a key network node rather than an inline.
- The building of a temporary bypass
- Provision of enhanced ratings from various techniques
- Reduction of Emergency return to Service times
- Temporary intertrip schemes
- Automatic Network Management (ANM) schemes
- Bringing investment forward
- Enhanced supply chain / procurement / resourcing contracts

The Enhanced Service Provision process can be proposed at any time in the development or planning of an outage programme where existing funding is not available. However, it does not prevent the Transmission Owner from using these techniques as part of normal outage business plan development if the Transmission Owner is certain that doing so, will deliver consumer savings.

6 COMMUNICATION

6.1 Regular Meetings

To ensure there is an effective Network Access Policy the Transmission Owner will commit to a robust communication process between NGESO, the Transmission Owner and other Transmission Owners during the long and short-term planning periods.

The following meetings will take place;

- Long Term Planning

A minimum of 4 outage planning meetings will be arranged each planning year between NGESO, the Transmission Owner and other Transmission Owners. These meetings will develop the long term planning years' outages via the Joint Planning Committee Operational Assessment (JPCOA) meetings. Options for Enhanced Service Provision and any enhanced stakeholder engagement are a priority here to identify and make best use of STCP 11.4 funding.

- Two Year Ahead

A minimum of 4 outage planning meetings will be arranged each planning year between NGESO, the Transmission Owner and other Transmission Owners. These meetings will develop the future planning years' outage and identify all known outage requirements known at that time.

- Year Ahead

A minimum of 4 outage planning meetings will be arranged each planning year between NGESO, the Transmission Owner and other Transmission Owners. These meetings will develop the next planning year outages requirements. At this stage of the process monthly communication between NGESO and the Transmission Owner will occur as the year ahead provisional outage plan is constructed by NGESO that will provide the Transmission Owner network access to our transmission system for "plan year 0". STCP 11.1 deadlines will be adhered to by the Transmission Owner so that NGESO can comply with their Grid Code obligations and formally notify parties affected by outages.

- Within Year

Communication between NGESO, the Transmission Owner and other Transmission Owners will follow the guidelines specified in STCP11.1, section 4. Further to this, and on a case by case basis the Transmission Owner and NGESO will endeavour to communicate on a tripartite basis with relevant stakeholders on necessary plan changes or valuable developments which may support activities of the relevant stakeholder.

6.2 Stakeholder Engagement

As part of the Transmission Owner commitment to stakeholder engagement the Transmission Owner will;

- Engage with our key stakeholders during the long-term planning framework to ensure they are involved in the outage planning process where projects and/or outages have a direct impact on them as agreed with NGENO in JPCOA meetings
- Work with NGENO and key stakeholders to develop solutions, if possible, to minimise the impact of outages that are of a duration greater than 4 weeks
- Ensure that changes to network outages or new outage requests within the current planning year are communicated to stakeholders as early as possible. This requires close co-ordination between the Transmission Owner and NGENO.
- Offer tri-partite meetings with NGENO and our stakeholders where required, 1-1 meetings or information calls to discuss any planning or operational issues that occur at any point in the planning timeframe.

*Note – Any outage proposal discussion between the Transmission Owner and stakeholders is purely to improve stakeholder engagement and to improve the service provided by the Transmission Owner. NGENO should be aware of any outage proposal prior to discussion with stakeholders and must not be considered as final until formally notified by NGENO . All formal outage notifications **must** come from ESO as stipulated in the STCPs as it is only NGENO who know the full GB system requirements and are therefore the only party able to approve outage proposals.*

7 KEY PERFORMANCE INDICATORS (KPI's)

As part of our Network Access Policy commitments and to ensure the Transmission Owner has fully transparent outage planning process, the Transmission Owner propose to collate a series of KPI's to monitor outage planning performance and outage delivery. Examples of these KPI's are attached in appendix A

These KPI's have been developed following feedback from customers and stakeholders of "Transmission Owner name", and in collaboration with the other GB Transmission Owners and NGENO. In order to continually drive improvements in performance, these KPI's shall be regularly reviewed and feedback on performance provided to stakeholders to promote transparency.

It is also proposed that certain KPIs theme are presented with a Transmission Owner component and an NGENO component to demonstrate how each party is performing in these areas. This will help highlight areas for both Transmission Owner and NGENO to improve, share best practices and therefore maximise consumer savings.

APPENDIX A

Network Access Policy KPIs - Transmission Owner

1. Number of faults due to asset failure

This would not include weather related faults or those caused by external parties. It would only include faults which are attributable to TO behaviour, require emergency switching, or where failure causes protection operation.

This KPI is used to measure a TOs ability to ensure their assets are safe and reliable, which is a key NAP principle.

KPI for OFGEM & ESO

2. Number of unplanned outages

This would include faults identified through routine inspections and managed via unplanned outage requests, such as hot spots.

This KPI would also measure a TO's ability to ensure their assets are safe and reliable.

KPI for OFGEM, ESO & Stakeholders

3. How many assets are out of service more than once per annum?

This KPI helps identify good outage alignment practices which help reduce constraint costs and stakeholder impact

KPI for OFGEM & ESO

4. Percentage of TO outages started outside 60mins of agreed start time (delay attributable to TO)

Stakeholders at OC2 forums have requested a measure of TOs ensuring outages are started on time.

KPI for ESO & Stakeholders

5. MW/HRs of generation curtailed by BCA per annum - firm connections

This is a measure of lost network access due to transmission outages and connection agreements requiring a generator to be at 0MW.

Stakeholders at OC2 forums have requested a KPI which shows the volume of generation impacted by TO's outages.

KPI for Generation Stakeholders

6. MW/HRs of generation curtailed by BCA per annum - non firm connections

This is a measure of lost network access due to transmission outages and connection agreements requiring a generator to be at 0MW.

Stakeholders at OC2 forums have requested a KPI which shows the volume of generation impacted by TO's outages.

KPI for Generation Stakeholders

8. Percentage of outages plan started within +/-3 days (tbc) of date agreed at Week 49
This is a measure of the TOs capability to construct and deliver a robust outage plan. This KPI was used through RIIO-T1 and it is to be continued in RIIO-T2 to provide a consistent KPI through price control periods.
KPI for OFGEM & ESO

9. Number of outage changes within 4 weeks of start date (attributable to TO)
This measure only includes significant outage scope change such as a new outage, change to the start or end date but would not include a minor ERTS change or start time change made to manage workload and prevent outage congestion. All stakeholders agree these changes should be highlighted to identify root causes so they can be addressed and help reduce stakeholder impact of outages
KPI for OFGEM, ESO & Stakeholders

10. Average outage duration accuracy
This KPI would measure how accurate a TO plans their outage durations. A negative figure would indicate outages generally overrun, a positive figure would indicate outages generally finish early. It would help identify good and bad planning practices to further improve outage planning efficiency
KPI for OFGEM, ESO & Stakeholders

11. Number of uses of STCP 11.4 (attributable to TO proposal)
This would highlight how often the TO is able to proactively generate consumer savings as STCP 11.4 requires consideration in longer timescales.
KPI for OFGEM, ESO & Stakeholders

Some of the KPIs above would be dependent on the timely delivery of the TOGA replacement system, eNAMS, and a review of various STCPs to ensure sufficient monitoring functionality is available