



Electricity Systems Team

Department for Energy Security and Net Zero
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And

Future System Operation
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Future System Operator- Second Policy Consultation and Update

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About Uniper

Düsseldorf-based Uniper is an international energy company with activities in more than 40 countries. The company and its roughly 7,000 employees make an important contribution to supply security in Europe, particularly in its core markets of Germany, the United Kingdom, Sweden, and the Netherlands.

Uniper's operations encompass power generation in Europe, global energy trading, and a broad gas portfolio. Uniper procures gas—including liquefied natural gas (LNG)—and other energy sources on global markets. The company owns and operates gas storage facilities with a total capacity of more than 7 billion cubic meters.

Uniper intends to be completely carbon-neutral by 2040. Uniper aims for its installed power generating capacity to be more than 80% zero-carbon by 2030. To achieve this, the company is transforming its power plants and facilities and investing in flexible, dispatchable power generating units. Uniper is already one of Europe's largest operators of hydropower plants and is helping further expand solar and wind power, which are essential for a more sustainable and secure future. The company is progressively expanding its gas portfolio to include green gases like hydrogen and biomethane and aims to convert to these gases over the long term.

Uniper is a reliable partner for communities, municipal utilities, and industrial enterprises for planning and implementing innovative, lower-carbon solutions on their



decarbonization journey. Uniper is a hydrogen pioneer, is active worldwide along the entire hydrogen value chain, and is conducting projects to make hydrogen a mainstay of the energy supply.

About Uniper UK

In the UK, Uniper owns and operates a flexible generation portfolio of seven power stations, a fast-cycle gas storage facility and two high pressure gas pipelines, from Theddlethorpe to Killingholme and from Blyborough to Cottam. We also have significant long-term regasification capacity at the Grain LNG terminal in Kent, to convert LNG back to natural gas.

Consultation Questions

1. Do you have any views on the proposed new security and resilience roles?

The proposed new security and resilience roles are appropriate for the FSO. Recent work by industry and government has considered the interaction between the electricity and gas systems and this proposal will address identified issues.

2. Do you have any views on the proposed new National Security power, and duty on the FSO?

There is no doubting the levity of national security and the importance of the energy system and continuity of essential services to national wellbeing. Whilst we can understand the case for the Secretary of State to be given a national security power, we would normally expect the enactment of something so important to be through primary or secondary legislation. The licence of the FSO appears to be too far down the legislative order to be addressing such serious concerns. This gives rise to other questions which require further thought. What happens if complying with this licence condition clashes with other legal requirements of the FSO contained in primary or secondary legislation? If the FSO complies with a direction from the Secretary of State and this has consequential effects on other parties, will the FSO enact code changes to direct other parties? Will there be a process to compensate affected parties if this power is used?

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