

Rory P Edwards

Ofgem
9 Millbank
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Dear Rory,

The Panel recommends urgency for BSC Modification [P328 'Clarifying BSC SBR definitions to align with the BSAD and SMAF Methodology Statements'](#).

National Grid raised P328 on 6 November 2015 and has requested that P328 be treated as urgent. The BSC Panel has considered this recommendation in accordance with the procedures set out in [Section F 2.9](#), and it unanimously recommends to the Authority that P328 be progressed as an Urgent Modification Proposal.

We now seek the Authority's determination as to whether urgency should be granted and, if so, endorsement of the process and timetable to be followed in respect of the Urgent Modification Proposal.

Issue and proposed solution

Since the approval of [P323 'Enabling inclusion and treatment of SBR in the Imbalance Price'](#), the National Grid has identified an additional example of Supplemental Balancing Reserve (SBR) provision that was not considered by the P323 Workgroup and therefore not covered in the BSC.

The Transmission Licence Standard Condition [C16 'Statements of the Transmission Licence' Balancing Services Adjustment Data \(BSAD\)](#) and [System Management Action Flagging \(SMAF\)](#) Methodology Statements have been updated to ensure that System Actions related to this additional scenario are also considered as SBR Actions. These changes add to the terms agreed under P323.

As such, the BSC's SBR definitions are incomplete when compared to those in the BSAD and SMAF statements.

P328 proposes to amend the definitions of "SBR Action" and "SBR" to align with the changes to the BSAD and SMAF changes.

Further information on P328 can be found in the Final Modification Report attached to this letter. This has also been published on the [P328 page](#) of the ELEXON website.

Proposer's rationale for Urgency

The Proposer requested that P328 be treated as an Urgent Modification Proposal. It believes that there is a need to align the BSC as soon as possible as:

- P323 was implemented as part of the November 2015 BSC Release and the changes to the C16 Licence Statements are now in effect, there is a date related event.

- SBR could be dispatched, and the provisions introduced by P323 used, between now and end of February 2016, and therefore there is a risk that certain types of SBR dispatched generation plant could be incorrectly treated within cash-out following P323's implementation with potential wider impacts on other BSC Parties.

Panel's views

The Panel considered the Proposer's request for Urgent status at its meeting today (12 November 2015).

Following its consideration, the Panel unanimously agreed that P328 should be treated as an Urgent Modification Proposal due to reasons set out by the Proposer, above.

Proposed progression timetable

Action	Date
Panel Meeting	12 November 2015
Panel recommendation on Urgency and on approval or rejection of the Modification	12 November 2015
Report and Urgency letter issued to Ofgem	12 November 2015
Implementation Date	+1Working Day

Decision required

In accordance with BSC Section F2.9, the Panel invites the Authority to determine whether P328 should be treated as an Urgent Modification Proposal and, if so, to direct the process and timetable to be followed.

Yours sincerely

Adam Lattimore
Modification Secretary

Attachment A: P328 Final Modification Report (including Legal Text)