Appendix B - Response Proforma

National Grid invites responses to this consultation by **8**th **March 2018**. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following proforma.

Please return the completed proforma to <u>balancingservices@nationalgrid.com</u>

Respondent:	Colin Berry
Company Name:	ELEXON
Does this response contain confidential information? If yes, please specify.	No

No	Question	Response (Y/N)	Rationale
1	Do you agree that the changes proposed to the ABSVD, shown in Table 1 have been implemented correctly to the ABSVD methodology in Appendix A? If not, please provide rationale.	Yes*	*Subject to my comments below
2	Do you agree that the changes proposed to the ABSVD, shown in Table 1 and in Appendix A, should be made? If not, please provide rationale.	Yes*	*Subject to my comments below
3	Do you have any other comments in relation to the changes proposed to the ABSVD?	Yes	See below

Review comments

explicitly excludes non-BM Fr Response Services from the ABSVD (whereas v7.1 issued informal consultation did not r reference to non-BM Frequen- Services (or indeed any non-I The absence in v7.1 caused or confusion, even at the BSV discussion of P354, as to whe Frequency Response Services reported in ABSVD). In gener have been helpful if NG had or reasons for the proposals in v especially for the changes be and v8.0. It is essential to say why certa Services are excluded from it the ABSVD Methodology, giv EBGL compliance depends or changes to the ABSVD methor That is, Article 49.3. of the of states: 'For each imbalance: each TSO shall deter activated volume of b energy calculated pur Article 45 and any vor for purposes other that the Methodology Statement that effective in 2019, it is not clear would achieve GB compliance 49.3? Part C: 2 H This should also cover the sc a BM Participant elects not to BM Unit for the allocation of A "BM Participant" is defined in but your usage in the ABSVD does not align with this definit I suggest that the titles of Par should be renamed along the "ABSVD where a B been notified by the E "ABSVD where a B been notified by the E "ABSVD where no been notified by the E	Section of ABSVD Methodology	H/M/L Comment	
Services are excluded from the ABSVD Methodology, gives EBGL compliance depends on changes to the ABSVD method the ABSVD method the ABSVD method that is, Article 49.3. of the of states: • 'For each imbalance each TSO shall detern activated volume of benergy calculated pure Article 45 and any vore for purposes other that the ABSVD method that the first that the ABSVD method that the ABSVD method that the ABSVD method that the ABSVD does not align with this definit that the ABSVD method that the ABSVD	Part C: 1	explicitly excludes non-BM Frequency Response Services from the reporting of ABSVD (whereas v7.1 issued for the informal consultation did not make any reference to non-BM Frequency Responsed Services (or indeed any non-BM services) The absence in v7.1 caused some confusion, even at the BSC Panel discussion of P354, as to whether non-B Frequency Response Services would be reported in ABSVD). In general, it would have been helpful if NG had explained the reasons for the proposals in v8.0 and especially for the changes between v7.1	se s). M
each TSO shall deter activated volume of be energy calculated pur Article 45 and any vo for purposes other that the services are not included in the Methodology Statement that we effective in 2019, it is not clear would achieve GB compliance 49.3? Part C: 2 H Therefore, if non-BM Frequer Services are not included in the Methodology Statement that we effective in 2019, it is not clear would achieve GB compliance 49.3? This should also cover the scan a BM Participant elects not to BM Unit for the allocation of A "BM Participant" is defined in but your usage in the ABSVD does not align with this definit I suggest that the titles of Par should be renamed along the "ABSVD where a B been notified by the Been no		It is essential to say why certain Balancir Services are excluded from the scope of the ABSVD Methodology, given that GB EBGL compliance depends on these changes to the ABSVD methodology. That is, Article 49.3. of the of the EBGL states:	ıg
Services are not included in the Methodology Statement that we ffective in 2019, it is not clear would achieve GB compliance 49.3? Part C: 2 H This should also cover the scan BM Participant elects not to BM Unit for the allocation of A "BM Participant" is defined in but your usage in the ABSVD does not align with this definit I suggest that the titles of Par should be renamed along the "ABSVD where a B been notified by the B with the suggest and been notified by the B with the Box of the Box		For each imbalance adjustment, each TSO shall determine the activated volume of balancing energy calculated pursuant to Article 45 and any volume activator purposes other than balancing	ted
Part C: 2 H This should also cover the scra BM Participant elects not to BM Unit for the allocation of A "BM Participant" is defined in but your usage in the ABSVD does not align with this definit I suggest that the titles of Par should be renamed along the "ABSVD where a B been notified by the B "ABSVD where no been notified by the B		Therefore, if non-BM Frequency Respon Services are not included in the ABSVD Methodology Statement that will become effective in 2019, it is not clear how NG would achieve GB compliance with Articl 49.3?	
Suggest that the titles of Par should be renamed along the "ABSVD where a B been notified by the E "ABSVD where no been notified by the E	Part C: 2	a BM Participant elects not to nominate a BM Unit for the allocation of ABSVD. "BM Participant" is defined in the Grid Cobut your usage in the ABSVD Methodolo does not align with this definition.	a ode gy
Part C: 2 M Suggest including underlined		I suggest that the titles of Part B and Par should be renamed along the lines of: • "ABSVD where a BM Unit has been notified by the BSP"; and • "ABSVD where no BM Unit has been notified by the BSP"	
follows: • "where a party continuous provide ancillary serv	Part C: 2	1 2 3 3 2 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3	<u>e</u>

4	Part E: 2.2	L	"BSCP11" should really be in brackets, rather than a standalone sentence.
5	Part E: 2.2	Н	If a Trading Dispute relating to ABSVD is upheld, NG may be required to resubmit ABSVD after RF (up to DF at D+28 months, or potentially up to D+40 months for an Extra Settlement Determination).