

Appendix B - Response Proforma

National Grid invites responses to this consultation by **8th 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 balancingservices@nationalgrid.com

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

	Section of ABSVD Methodology	H/M/L	Comment
1	Part C: 1	H	<p>Version 8.0 of the ABSVD Methodology 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 Response 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-BM 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 and v8.0.</p> <p>It is essential to say why certain Balancing 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:</p> <ul style="list-style-type: none"> • ‘For each imbalance adjustment, each TSO shall determine the activated volume of balancing energy calculated pursuant to Article 45 and any volume activated for purposes other than balancing.’ <p>Therefore, if non-BM Frequency Response 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 Article 49.3?</p>
2	Part C: 2	H	<p>This should also cover the scenario where a BM Participant elects not to nominate a BM Unit for the allocation of ABSVD. “BM Participant” is defined in the Grid Code but your usage in the ABSVD Methodology does not align with this definition.</p> <p>I suggest that the titles of Part B and Part C should be renamed along the lines of:</p> <ul style="list-style-type: none"> • “...ABSVD where a BM Unit has been notified by the BSP”; and • “...ABSVD where no BM Unit has been notified by the BSP”
3	Part C: 2	M	<p>Suggest including underlined text as follows:</p> <ul style="list-style-type: none"> • “...where a party contracts to provide ancillary services <u>that are included in the scope of this ABSVD Methodology</u> directly...”.

4	Part E: 2.2	L	"BSCP11" should really be in brackets, rather than a standalone sentence.
5	Part E: 2.2	H	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).