

Report Phase Consultation Questions

E L E X O N

P451 'Updating BSC Black Start provisions and compensation arrangements to align with NGENO's new approach to System Restoration'

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation



Your response

We invite you to respond to the questions in this form.



How to return your response

Please send responses, entitled 'P451 Report Phase Consultation', to bsc.change@elxon.co.uk by 5pm on 17 November 2023

1 Response Form

We welcome your responses to the questions set out in this response form. To help us understand your views, please provide supporting reasons. We encourage you to provide financial information showing any costs and/or benefits of this change to your business.

If you responded to the Assessment Procedure Consultation and your views have not changed, you can let us know in the 'Your Details' section.

Elxon can treat any information provided as confidential if you request this, although we will provide all information to the Authority.

2 Your Details

Respondent

Name	Paul Mott
Organisation	National Grid-ESO
Contact telephone number	07752-extracharacterstodefeatwebcrawlerbots-987992

Parties Represented

BSC Party role(s) represented (mark all that apply)	<input type="checkbox"/> Generator	<input type="checkbox"/> Supplier	<input type="checkbox"/> Distributor
	<input type="checkbox"/> Interconnector User	<input type="checkbox"/> Interconnector Administrator	<input type="checkbox"/> Interconnector Error Admin
	<input type="checkbox"/> Non Physical Trader	<input checked="" type="checkbox"/> System Operator	<input type="checkbox"/> Virtual Lead Party
Non-Party role(s) represented (mark all that apply)	<input type="checkbox"/> ECVNA	<input type="checkbox"/> Trade Body ¹	<input type="checkbox"/> MVRNA
	<input type="checkbox"/> Consultant	<input type="checkbox"/> Supplier Agent	<input type="checkbox"/> Other [please state]

Confidentiality

Does this response contain confidential information?	No If 'Yes', please clearly mark the confidential parts
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¹ Please state how many members you represent and which roles, where possible.

P451
Report Phase Consultation
Questions

17 October 2023

Version 0.1

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Assessment Procedure Consultation

Tick this box if you responded to the Assessment Procedure Consultation for P451 and your views have **not** changed. Note that this means you do not need to answer the questions below.



3 Report Phase Consultation Questions

Question 1

Do you agree with the Panel's initial unanimous recommendation that P451 should be approved ?	Yes/No
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Please provide your rationale with reference to the Applicable BSC Objectives.

[Insert rationale here](#)

Question 2

Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P451?	Yes/No
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Please provide your rationale. Please record any general comments below and any specific comments in Section 4 of this response form.

[Insert rationale here](#)

Question 3

Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P451?	Yes/No
--	--------

Please provide your rationale. Please record any general comments below and any specific comments in Section 5 of this response form.

[Insert rationale here](#)

Question 4

Do you agree with the Panel's recommended Implementation Date?	Yes/No
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Please provide your rationale.

[Insert rationale here](#)

Question 5

Do you agree with the Panel's initial view that P451 should not be treated as a Self-Governance Modification?	Yes/No
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Please provide your rationale.

[Insert rationale here](#)

Question 6

Do you agree with the Panel's initial consideration that P451 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?	Yes/No
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Please provide your rationale.

[Insert rationale here](#)

Question 7

Do you have any comments on the impact of P451 on the EBGL objectives?

Yes/No

Please provide your rationale.

Insert rationale here

Question 8

Do you agree with the identified consumer benefits?

Yes/No

Please provide your rationale.

Insert rationale here

Question 9

Do you have any further comments on P451?

Yes/No

If 'Yes', please provide your comments.

Insert comments here

4 P451 Redlined Legal Text

If you answered 'No' to Question 2, please use this section to record any specific comments you have against the P451 BSC Section draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

Insert BSC Section here	
Location	Comment

Insert BSC Section here	
Location	Comment

Insert BSC Section here	
Location	Comment

5 P451 Redlined CSD Text

If you answered 'No' to Question 3, please use this section to record any specific comments you have against the P451 CSD draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

Insert CSD here	
Location	Comment

Insert CSD here	
Location	Comment

Insert CSD here	
Location	Comment

To help us process your response, please:

- Email your completed response form to bsc.change@elexon.co.uk, entering “P451 Report Phase Consultation” in the subject line
- Clearly indicate any confidential parts of your response
- Respond by **5pm on Friday 17 November 2023** (the Panel may not be able to consider late responses)

The Panel will consider your consultation response at its meeting on 14 December 2023, where it will provide a final recommendation to the Authority on whether or not P451 should be approved.

Applicable BSC Objectives

The Applicable BSC Objectives are:

- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- b) The efficient, economic and co-ordinated operation of the National Transmission System
- c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
- d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
- e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- g) Compliance with the Transmission Losses Principle