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| P455 ‘On-Site Aggregation as a method to facilitate Third Party Access’ |

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.

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

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| **Your response** |
| We invite you to respond to the questions in this form.  |
|  |
| **How to return your response** |
| Please send responses, entitled ‘P455 Report Phase Consultation’, to [**Elexon Support**](https://support.elexon.co.uk/csm) by **5pm** on**Friday 19 April 2024**. |

Your Details

| Respondent |
| --- |
| Name |  |
| Organisation |  |
| Contact telephone number |  |

| Parties Represented |
| --- |
| BSC Party role(s) represented (mark all that apply) | [ ]  Generator | [ ]  Supplier | [ ]  Distributor |
| [ ]  Interconnector  User | [ ]  Interconnector Administrator | [ ]  Interconnector  Error Admin |
| [ ]  Non Physical  Trader | [ ]  System  Operator | [ ]  Virtual Lead  Party |
| Non-Party role(s) represented (mark all that apply) | [ ]  ECVNA | [ ]  Trade Body[[1]](#footnote-1) | [ ]  MVRNA |
| [ ]  Consultant | [ ]  Supplier  Agent | [ ]  Other  [please state] |

| Confidentiality |
| --- |
| Does this response contain confidential information? | If ‘Yes’, please clearly mark the confidential parts  |

| Assessment Procedure Consultation |
| --- |
| Tick this box if you responded to the Assessment Procedure Consultation for P455 and your views have **not** changed. Note that this means you do not need to answer the questions below.  | [ ]  |

1. Report Phase Consultation Questions

| **Question 1** |
| --- |
| Do you agree with the Panel’s initial unanimous recommendation that P455 should be **approved/rejected**? |  |
| Please provide your rationale with reference to the Applicable BSC Objectives. |
|  |

| **Question 2** |
| --- |
| Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P455? |  |
| Please provide your rationale. Please record any general comments below and any specific comments in Section 4 of this response form. |
|  |

| **Question 3** |
| --- |
| Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P455? |  |
| Please provide your rationale. Please record any general comments below and any specific comments in Section 5 of this response form. |
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| **Question 4** |
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| Do you agree with the Panel’s recommended Implementation Date? |  |
| Please provide your rationale. |
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| **Question 5** |
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| Do you agree with the Panel’s initial view that P455 should not be treated as a Self-Governance Modification? |  |
| Please provide your rationale. |
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| **Question 6** |
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| Do you agree with the Panel’s initial consideration that P455 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC? |  |
| Please provide your rationale. |
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| **Question 7** |
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| Do you have any comments on the impact of P455 on the EBGL objectives? |  |
| Please provide your rationale. |
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| **Question 8** |
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| Do you agree with the identified consumer benefits? |  |
| Please provide your rationale. |
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| **Question 9** |
| --- |
| Do you have any further comments on P455? |  |
| If ‘Yes’, please provide your comments. |
|  |

1. P455 Redlined Legal Text

If you answered ‘No’ to Question 2, please use this section to record any specific comments you have against the P455 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** |
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| **Location** | **Comment** |
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| **Insert BSC Section here** |
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| **Insert BSC Section here** |
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| **Location** | **Comment** |
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1. P455 Redlined CSD Text

If you answered ‘No’ to Question 3, please use this section to record any specific comments you have against the P455 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** |
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| **Location** | **Comment** |
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1. Further Information

To help us process your response, please:

* Email your completed response form to **bsc.change@elexon.co.uk**, entering “P455 Report Phase Consultation” in the subject line
* Clearly indicate any confidential parts of your response
* Respond by **5pm** on **Friday 19 April 2024** (the Panel may not be able to consider late responses)

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

#### Applicable BSC Objectives

The Applicable BSC Objectives are:

1. The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
2. The efficient, economic and co-ordinated operation of the National Transmission System
3. 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
4. Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
5. 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]
6. 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
7. Compliance with the Transmission Losses Principle
1. Please state how many members you represent and which roles, where possible. [↑](#footnote-ref-1)