Assessment Procedure Consultation Responses

P363 'Simplifying the registration of new configurations of BM Units' & P364 'Clarifying requirements for registering and maintaining BM Units'

This Assessment Procedure Consultation was issued on 8 February 2019, with responses invited by 28 February 2019.

Phase

- Initial Written Assessment
- Definition Procedure
- Assessment Procedure
- Report Phase
- Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
National Grid ESO	One	Transmission Company
Viridis 178 (Green Frog)	One	Generator
Flexible Generation Group	Eight	Generator
Centrica	One	Generator, Supplier, ECVNA, MVNA
Welsh Power	One	Generator
The Association for Decentralised Energy	Multiple	Trade Association

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Question 1: Should the BM Unit aggregation limit be based on Grid Code's definition of 'Small Power Station' or another amount?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	2

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	Alignment between the codes is important as they work together as a Framework. This also reflects the practice today where a unit below this size, not wishing to participate in the BM, would be allowed to configure in this way.
Viridis 178 (Green Frog)	Yes	There is some sense to aligning the size differentiation with that used elsewhere in the codes
Flexible Generation Group	Yes	Keeping definitions aligned is helpful to smaller parties.
Centrica	See comments	We would not support the requirement to be a BMU being at levels (in terms of size) lower than the current figures as it places an un-necessary burden on small generators.
Welsh Power	Yes	N/A
The Association for Decentralised Energy	Nil response	The ADE has no comment.

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Question 2: Should the auxiliary/back-up limit be 415V based on precedence, 1kV based on a recognised definition of low voltage or an other amount?

Summary

Yes	No	Neutral/No Comment	Other
3	0	2	1

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	We support a nominal 415V as this is a standard supply voltage in the UK. Noting that this a pragmatic solution to recognise Auxiliary Supplies without the need for a non-standard BMU application, rather than to allow a way for batteries to charge under SVA and sell in CVA.
Viridis 178 (Green Frog)	No Opinion	Nil Comment
Flexible Generation Group	Yes	Unless a party has a different proposal
Centrica	Yes	A higher number than 415 V would seem sensible given the arbitrary nature of this figure so would be content with 1 kV.
Welsh Power	No response	No comment
The Association for Decentralised Energy	No response	It seems sensible to base the auxiliary/back-up limit on precedence, which is the result of market conditions, at 415V.

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Question 3: Are there any other criteria that should be included in BSC Section K3.1.2?

Summary

Yes	No	Neutral/No Comment	Other
0	2	4	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	No, the Workgroup has robustly considered the principles.
Viridis 178 (Green Frog)	Nil response	Nil response
Flexible Generation Group	Nil response	Nil response
Centrica	Nil response	No comment
Welsh Power	Nil response	No comment
The Association for Decentralised Energy	No	The ADE does not believe that any other criteria should be included.

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Question 4: Do you agree that the Teleswitch Groups caveat is better placed in K3.3 than K3.1.2?

Summary

Yes	No	Neutral/No Comment	Other
0	0	6	0

Responses

Respondent	Response	Rationale
National Grid ESO	Nil	No comment
Viridis 178 (Green Frog)	No Opinion	No comment
Flexible Generation Group	No comment	This is a drafting issue for the lawyers.
Centrica	No comment	No comment
Welsh Power	Nil response	No comment
The Association for Decentralised Energy	No response	The AD has no comment

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Question 5: Are there any other configurations of Plant and Apparatus that should be deemed to satisfy the requirements to be a BM Unit and be included in K3.1.4 that are not covered by the revised BSC Section K3.1.2 criteria?

Summary

Yes	No	Neutral/No Comment	Other
0	4	2	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	We are satisfied that the Workgroup sufficiently considered alternative configurations, and those not deemed accepted can still apply as a non-standard BMU is required.
Viridis 178 (Green Frog)	No response	No comment
Flexible Generation Group	No	Not that we are aware of.
Centrica	No	No rationale provied
Welsh Power	Nil response	No comment
The Association for Decentralised Energy	No	The configurations covered here seem to be sufficient.

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Question 6: Do you agree that the single P363/4 solution will address the individual defects identified by P363 and P364 i.e. is a combined solution appropriate and does it work?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	We believe the single P363/364 solution will effectively resolve both defects.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	Yes	This seems a sensible and workable approach.
Centrica	Yes	No rationale provied
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	The ADE believes that the combined solution is appropriate.

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Question 7: Do you agree that P363 and P364 should be amalgamated and P364 taken forward?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	We believe the single P363/364 solution will effectively resolve both defects.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	Yes	No comment
Centrica	Yes	No rationale provided
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	No rationale provided

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Question 8: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P363/4?

Summary

Yes	No	Neutral/No Comment	Other
4	0	2	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	The legal text as drafted appears to deliver the intention of the solution.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	No response	We have not checked it.
Centrica	No comment	Not read
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	No rationale provided

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Question 9: Do you agree with the Workgroup that the draft redlining in Attachments B and C delivers the intention of P363/4?

Summary

Yes	No	Neutral/No Comment	Other
4	0	2	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	The legal text as drafted appears to deliver the intention of the solution.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	No response	We have not had time to check it.
Centrica	No comment	Not read
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	No rationale provided

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Question 10: Do you agree that P363/4 meets the Self-Governance Criteria and so should be progressed as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	P363/4 better facilitates Applicable BSC Objective (c) and has a material impact on competition and so should not be treated as Self-Governance, noting that we expect this to be a positive effect.
Viridis 178 (Green Frog)	Yes	This was determined to the workgroup's satisfaction at the very beginning of this process
Flexible Generation Group	Yes	This creates some new obligations on parties and therefore making sure that all parties are aware of the change seems more sensible.
Centrica	Yes	No rationale provided
Welsh Power	Yes	Unless there is any objection to the proposed modification by a party
The Association for Decentralised Energy	Yes	The modification meets the Self-Governance Criteria.

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Question 11: Do you agree that the two configurations proposed by P363 should be incorporated into K3.1.4 were P363 to be implemented as a stand-alone solution?

Summary

Yes	No	Neutral/No Comment	Other
5	0	1	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	Noting that we support the combined P363/364 Solution.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	Yes	No comments
Centrica	Yes	No rationale provided
Welsh Power	Yes	No comment
The Association for Decentralised Energy	No response	The ADE has no comment

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Question 12: Do you agree that the P364 solution will make registration simpler were it to be implemented as a stand-alone solution?

Summary

Yes	No	Neutral/No Comment	Other
4	1	1	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	The P364 solution will need more development before we can support this as a standalone solution.
Viridis 178 (Green Frog)	Yes	No rationale provided
Flexible Generation Group	Yes	No rationale provided
Centrica	Yes	No rationale provided
Welsh Power	Yes	No comment
The Association for Decentralised Energy	No response	The ADE has no comment

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Question 13: Will the implementation of P363/4 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	Please see the separate Transmission Company Analysis response.
Viridis 178 (Green Frog)	Yes	P364 should enable our sites to register as standard BMUs and avoid the administrative risks associated with being categorised as non-standard.
Flexible Generation Group	Yes	This change should make it easier and quicker for smaller parties to register BMUs, which will be important for the longer term.
Centrica	Yes	It is likely to make future registrations simpler
Welsh Power	Yes	The proposed modification simplifies our route into the BM.
The Association for Decentralised Energy	Yes	The implementation of P363/4 will have a positive impact upon some ADE members, making registration of BM Units faster and more efficient in some cases.

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Question 14: Will your organisation incur any costs in implementing P363/4?

Summary

Yes	No	Neutral/No Comment	Other
0	5	1	0

Responses

Respondent	Response	Rationale
National Grid ESO	No	Please see the separate Transmission Company Analysis response.
Viridis 178 (Green Frog)	No	No comment
Flexible Generation Group	No	No comment
Centrica	No	No rationale provided
Welsh Power	No	No comment
The Association for Decentralised Energy	No response	The ADE has no comment

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Question 15: How long (from the point of Panel approval) would you need to implement P363/4?

Responses

Respondent	Response
National Grid ESO	P363/364 should work with our existing processes and systems.
Viridis 178 (Green Frog)	We would be able to start registering BMUs as soon as our build schedule permits.
Flexible Generation Group	No time
Centrica	No time delay required for us
Welsh Power	We would not need any time to implement P364/4
The Association for Decentralised Energy	The ADE has no comment

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Question 16: Do you agree with the proposed Implementation of P363/4?

Summary

Yes	No	Neutral/No Comment	Other
6	0		0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	Implementing in the June release avoids some of the other key BSC changes being delivered this year.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	Yes	No comment
Centrica	Yes	No rationale provided
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	No rationale provided

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Question 17: Do you agree with the Workgroup's initial majority view that P363/4 does better facilitate the Applicable BSC Objectives than the current baseline and so should be approved?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
National Grid ESO	Yes	Our view has not changed from that expressed during the Workgroup vote.
Viridis 178 (Green Frog)	Yes	No comment
Flexible Generation Group	Yes	The change would make the BSC more efficient and economic so fulfilling objective (d). In the longer term we believe more parties will move to be BMUs and that should improve the competition in the market, better fulfilling objective (c).
Centrica	Yes	No rationale provided
Welsh Power	Yes	No comment
The Association for Decentralised Energy	Yes	No rationale provided

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Question 18: Do you have any further comments on P363/4?

Summary

Yes	No
0	6

Responses

Respondent	Response	Comments
National Grid ESO	No	No further comments provided
Viridis 178 (Green Frog)	No	No further comments provided
Flexible Generation Group	No	No further comments provided
Centrica	No	No further comments provided
Welsh Power	No	No comment
The Association for Decentralised Energy	No	No further comments provided

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