

# Report Phase Consultation Responses

## P392 'Amending the BSC change process to incorporate the delegation of NGESO's powers and obligations under the EBGL to change EBGL Article 18 terms and conditions'

This Report Phase Consultation was issued on 15 April 2020, with responses invited by 29 April 2020.



### Phase

[Initial Written Assessment](#)[Definition Procedure](#)[Assessment Procedure](#)[Report Phase](#)[Implementation](#)

### Consultation Respondents

Respondent	Role(s) Represented
National Grid ESO (NGESO)	System Operator
Association for Decentralised Energy (ADE)	Trade Body

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P392 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO agrees that P392 should be approved. The proposal better facilitates BSC objectives a) & e) - by enhancing the BSC code modification process to incorporate aspects that fulfil the criteria of the Electricity Balancing Guideline (EBGL), it allows compliance with the EBGL change process while keeping changes to the BSC code modification procedures to a minimum. While it does add new elements to the BSC modification process, changes are kept to a minimum so the proposal does offer a streamlined solution to accommodate EBGL changes, therefore better facilitating objective d).
ADE	Yes	P392 better facilitates Objectives (a), by ensuring effective discharge of Transmission Company obligations in an efficient way, (d), by promoting efficiency through ensuring BSC Change and Article 18 change processes are progressed together, and (e), by ensuring compliance with EBGL.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P392?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
NGESO	Yes	The legal text has considered the discussions held within the workgroup and delivers the intention of P392.
ADE	Yes	The changes appear to deliver the intention of P392.

Question 3: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO agrees with the recommended implementation date, which meets the implementation date required by Ofgem.
ADE	Yes	

Question 4: Do you agree with the Panel's initial view that P392 should not be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
NGESO	Yes	This proposal does make changes to the BSC modification process to the extent that Self-Governance Criteria should not apply and Authority direction should be required. It is also appropriate that the Authority decide where modifications impact on the European network codes.
ADE	Yes	P392 will have a material impact on the code modification process, so should not be treated as a Self-Governance Modification.

Question 5: Do you have any further comments on P392?

### Summary

Yes	No
1	1

### Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO believes that modification P392 provides a solution that allows compliance with the EBGL change process while keeping changes to the BSC code modification procedures to a minimum. As such, NGESO supports the modification.
ADE	No	-