

# Report Phase Consultation Responses



## P376 'Utilising a Baselining Methodology to set Physical Notifications for Settlement of Applicable Balancing Services'

This Report Phase Consultation was issued on 25 March 2021, with responses invited by 25 April 2021.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
The Association for Decentralised Energy (ADE)	Trade Body representing around 150 members, including Suppliers, VLPs and aggregators.
GridBeyond Limited	VLP
IMServ Europe	HHDA

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27 April 2021

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Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P376 better facilitates Applicable BSC Objectives (b), (c) and (e)?

### Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

### Responses

Respondent	Response	Rationale
ADE	Yes	P376 better facilitates Objective (b) by removing a barrier to entry for VLPs, thereby increasing the options available to balance the system and allowing more efficient and economic balancing; it better facilitates Objective (c) by encouraging more participation in the market, thereby increasing competition; and it better facilitates Objective (e) by removing a barrier to entry for additional customers to participate in RR.
GridBeyond Limited	Yes	Yes we believe this modification removes the barriers for VLPs to enter the market by increase the option to sign up more BTM, Renewable assets and hence increases the competition. Though to fully delivery these objectives, we believe this baseline method should be applied on asset level.
IMServ Europe	Yes	None provided

Question 2: Do you agree with the Panel's initial unanimous recommendation that P376 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

### Responses

Respondent	Response	Rationale
ADE	Yes	None provided
GridBeyond Limited	Yes	This is the right step to open the market to different type of assets and increase competition
IMServ Europe	Yes	None provided

Question 3: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P376?

**Summary**

Yes	No	Neutral/No Comment	Other
2	0	1	0

**Responses**

Respondent	Response	Rationale
ADE	Yes	None provided
GridBeyond Limited	Yes	None provided
IMServ Europe	No response	None provided

Question 4: Will P376 impact your organisation?

**Summary**

High	Medium	Low	None	Other
1	1	0	0	1

**Responses**

Respondent	Response	Rationale
ADE	N/A	As a trade association, the ADE will not be directly impacted by P376.
GridBeyond Limited	High	As a demand response aggregator, most of assets are BTM, and renewable assets, hence removing the challenge of predicting the site's load can help us to sign up more flexibility in the BM, applying the baseline method on asset level, can further help us to provide very accurate baseline and PN and opens BM to all of our assets.
IMServ Europe	Medium	None provided

## Question 5: How much cost will you incur to implement P376?

### Summary

High	Medium	Low	None	Other
0	0	1	0	2

### Responses

Respondent	Response	Rationale
ADE	N/A	As a trade association, the ADE will not incur costs.
GridBeyond Limited	Low	None Provided
IMServ Europe	No response	Unchanged from Assessment Consultation. <i>IMServ indicated low to mid £10Ks in its response to the Assessment Procedure Consultation.</i>

## Question 6: What will the ongoing cost of P376 be to your organisation?

### Summary

High	Medium	Low	None	Other
0	0	2	0	1

### Responses

Respondent	Response	Rationale
ADE	N/A	As a trade association, the ADE will not incur costs.
GridBeyond Limited	Low	None Provided
IMServ Europe	Low	Without knowing the detailed requirements, any estimate is a little speculative, see my response to question 12. Probably low.

## Question 7: How long (from the point of approval) would you need to implement P376?

### Summary

0-6 months	6-12 months	>12 months	Other
2	0	0	1

### Responses

Respondent	Response	Rationale
ADE	N/A	As a trade association, the ADE will not need to make changes for implementation of P376.
GridBeyond Limited	<6 months	None Provided
IMServ Europe	3-6 months	Without knowing the detailed requirements, any estimate is a little speculative, see my response to question 12. Probably low.

## Question 8: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
2	1	0	0

### Responses

Respondent	Response	Rationale
ADE	Yes	The ADE is disappointed that the recommended Implementation Date has slipped from November 2022 to February 2023; we would like to see the Modification implemented as soon as possible. If implementation of the required central system changes is possible in time, we would recommend that the Implementation Date be altered back to the Workgroup's recommendation of November 2022.
GridBeyond Limited	No	We believe that if it is possible to implement this modification earlier, the timeline should be moved latest to 2022.
IMServ Europe	Yes	No change from Assessment Consultation. <i>IMServ agreed with the Implementation Date in its response to the Assessment Procedure Consultation.</i>

Question 9: Do you agree with the Panel's initial consideration that P376 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

### Summary

Yes	No	Neutral/No Comment	Other
1	0	2	0

### Responses

Respondent	Response	Rationale
ADE	Yes	If implemented, P376 would require changes to elements of the Article 18 terms and conditions. P376 is consistent with EBGL objectives as it fosters competition by removing barriers to providing balancing services and enhances efficiency of balancing by increasing the variety of participants that can provide these services.
GridBeyond Limited	No response	None Provided
IMServ Europe	No view	None provided

Question 10: Do you have any comments on the impact of P376 on the EBGL objectives?

### Summary

Yes	No	Neutral/No Comment	Other
1	0	2	0

### Responses

Respondent	Response	Rationale
ADE	Yes	If implemented, P376 would require changes to elements of the Article 18 terms and conditions. P376 is consistent with EBGL objectives as it fosters competition by removing barriers to providing balancing services and enhances efficiency of balancing by increasing the variety of participants that can provide these services.
GridBeyond Limited	No response	None Provided
IMServ Europe	No view	None provided

Question 11: Do you agree with the Panel's initial view that P376 should not be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

### Responses

Respondent	Response	Rationale
ADE	Yes	P376 will increase competition in the provision of balancing services, so has a material impact and should not be progressed as a Self-Governance Modification. In addition, it impacts EBGL Article 18 Terms and Conditions.
GridBeyond Limited	Yes	None Provided
IMServ Europe	Yes	None provided

## Question 11: Do you have any further comments on P376?

### Responses

Respondent	Response
ADE	The ADE would like to highlight the Panel and Workgroup’s unanimous view that P376 better facilitates the Applicable BSC Objectives than the current baseline. This strong support, from parties across the industry, is welcome and worthy of recognition.
GridBeyond Limited	<p>We believe without this modification, VLPs do not have a fair chance of adding carbon free flexibilities such as BTM demand to BM. This modification is essential to allow variety of assets and hence increase competition in BM.</p> <p>Given that we can send asset level operational data to NG, we believe it is important to have the option to use baseline methodology on asset level to provide an accurate PN and remove any concern about site’s performance for VLPs.</p>
IMServ Europe	<p>It would be more than useful if Code Subsidiary Documents could be produced alongside the Business Requirements and/or Legal Text changes. This has a number of advantages:</p> <ol style="list-style-type: none"> <li>1. It would identify new requirements on all Parties and Party Agents much earlier, allowing for a more accurate assessment of costs, timescales, and feasibility.</li> <li>2. It would reduce the risk that further Modifications need to be raised. For example, in the very recent case of P375, Elexon themselves had a desire to change the approach to the CSDs but felt constrained by the fact the Legal Text had already been agreed.</li> </ol> <p>On a more specific point but related to the above, although P376 is significantly underpinned by P375 for which CSDs are at least in draft form, there appears to be 2 new requirements on HHDAs – BR3.1 and BR3.2, however without the detail of how this is to be achieved. This is a completely new requirement with no analogous processes which could make it difficult/costly to implement. Further detail would be most beneficial.</p>

We additionally received an email response from Centrica reiterating their support for P376. Centrica expressed disappointment that the proposed Implementation Date had moved to February 2023, noting that flexibility providers were keen to see the change. Centrica fed into the ADE response.