

Issue Report

Issue 94 'Assessing barriers to entry to the Balancing Mechanism for sub 1MW providers and decimal bids'

ELEXON



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About This Document

This document is the Issue 94 Group's Report to the BSC Panel. Exelon will table this report at the Panel's meeting on 11 November 2021.

There are two parts to this document:

- This is the main document. It provides details of the Issue Group's discussions and conclusions on the highlighted issue and contains details of the Workgroup's membership.
- Attachment A contains the Issue 94 proposal form.
- Attachment B contains National Grid ESO's internal impact assessment on barriers to entry to the Balancing Mechanism for sub 1MW providers. This document was issued to industry by National Grid ESO in 2020 and formed the basis for Issue 94.

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Issue 94 was raised by National Grid Electricity System Operator (NGESO) on 6 April 2021 to assess barriers to entry to the Balancing Mechanism (BM) for sub 1 Megawatt (MW) providers and decimal bids, i.e. those smaller than 1MW.

What is the Issue?

The ESO conducted an internal impact assessment to understand the barriers to entry to the BM for Market Participants with a capacity of less than 1MW (and users with decimal bids) across a range of internal areas including the Industry Codes and control room, IT and Settlement systems. The assessment concluded that a greater number of smaller balancing services providers will help to enable zero carbon system operation. Further, the 1MW threshold and Grid Supply Point (GSP) level constraint has been noted by Market Participants as a blocker to participation. If demand or embedded generation are only visible at a GSP Group level, and network constraints don't align with GSP Group boundaries, it can be impossible to tell whether a facility is alleviating or exacerbating the issue.

Conclusions

The Issue Group concluded that no new BSC Modifications or Change Proposals are required to be raised directly from Issue 94, but noted that there could be future consequential BSC changes required to be raised from future Grid Code (GC) or Connection and Use of System Code (CUSEC) Modifications relating to barriers to entry to the BM.



What's the difference between Standard and Specific Products?

A Standard Product is a harmonised balancing product defined by all European Union (EU) Transmission System Operators (TSOs) for the exchange of balancing services e.g. Trans European Replacement Reserve Exchange (TERRE) and Manually Activated Reserves Initiative (MARI). In the context of balancing services, a Specific Product is a Product that is not a Standard Product. These are products only specific to balancing services within a country.

NGESO has committed to facilitating the transition to a zero carbon energy system in line with government net zero targets. This includes building the future Balancing Services and wholesale markets to attract the volume of flexibility, including small scale flexibility, needed to unlock future greater consumer value and manage the low carbon system.

The ESO conducted an internal impact assessment to understand the barriers to entry to the BM for Market Participants with a capacity of less than 1MW (and users with decimal bids) across a range of internal areas including the Industry Codes and control room, IT and Settlement systems. The assessment concluded that a greater number of smaller balancing services providers will help to enable zero carbon system operation. Further, the 1MW threshold and GSP level constraint has been noted by Market Participants as a blocker to participation. If demand or embedded generation are only visible at a GSP group level, and network constraints don't align with GSP group boundaries, it can be impossible to tell whether a facility is alleviating or exacerbating the issue.

The key findings of the internal impact assessment showed that the existing ESO IT tools have been hard coded to only accept integers (whole numbers). The ESO is currently transforming its suite of IT tools through the [NGESO Balancing Programme](#). This is expected to complete by 2025. The shift from integers can only happen when the new tools are in place.

The Issue Group was formed to engage Market Participants to help assess the barriers to entry to the Balancing Mechanism for sub 1MW providers and decimal bids. Representatives from twenty organisations, including Elexon and NGESO, attended the Issue Group meetings.

What is the issue?

On 18 June 2020, ACER (Agency for the Cooperation of Energy Regulators) published [its decision](#) relating to standard products as required by [Commission Regulation \(EU\) 2017/2195 'Establishing a Guideline on electricity balancing'](#) (EB GL). The decision relates to the methodology and list for standard products for balancing capacity, and meant that bids relating to standard products should have a minimum threshold of 1MW and can only be offered in 1MW increments. Following the United Kingdom's (UK's) exit from the European Union (EU) Implementation Period, the EB GL, and any decisions made before the end of the Implementation Period were subsumed into UK law.

Specific products i.e. products only required for Great Britain (GB), (each must be approved by Ofgem) do not have to meet the same criteria. When Issue 94 was raised, some services weren't specific but they are now.

Additionally, an increasing number of small players participating in the Balancing Services market would necessitate a robust approach and accurate data for Settlement and metering, to enable visibility for efficient control room operations. Simultaneously, viability for small players is required to allow entry and competition.

Issue 94 was raised to see what other Industry changes could be made ahead of the expected 2025 IT change to aid Market Participants' participation in the BM.

NGESO shared the initial findings from their internal impact assessment during the first Issue Group meeting. NGESO's internal impact assessment can be found in Attachment A of this Issue Report.

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Why did NGESO raise Issue 94?

NGESO believe that addressing barriers to entry will create significant consumer benefits by facilitating more competitive balancing services markets, driving down costs for the end consumer. NGESO also believe it will unlock flexibility for emerging, low-carbon technologies. They believe small scale flexibility providers have a part to play in enabling the transition to a net zero energy system in the UK, and some of these providers have told NGESO that this issue is a barrier to their bringing greater volume of small scale flexibility to the market. They furthermore believe that addressing this issue isn't purely an IT challenge for the ESO, but is likely to have an impact on the systems and processes for all Market Participants. They wanted to facilitate the discussion around the impacts existing processes and regulation have on small players.

This would give NGESO the opportunity to identify challenges and strive to find solutions that will enable growth in the small scale flexibility market, once it is ready to join and participate in the BM. They additionally wanted to investigate if there are opportunities that can be delivered ahead of the IT transformation, for example through joint aggregation.

Outcomes from Issue 94

The Proposer's rationale for raising Issue 94 was to:

- Assess what other barriers/defects may exist which are not being tackled by current Modifications, which if removed may allow sites to participate in Balancing Services;
- Consider other ongoing related BSC (Balancing and Settlement Code) Modifications including [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#), [P376 'Utilising a Baseline Methodology to set Physical Notifications for Settlement of Applicable Balancing Services'](#) and [P415 'Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties'](#) and their contribution to lowering barriers to entry, i.e. will these BSC Modifications remove sufficient barriers to make it easier for Aggregators to meet the 1MW threshold;
- Identify what improvements should be made and any necessary Code Modification(s) to facilitate those improvements (this includes the BSC as well as other Codes).

NGESO's internal impact assessment

NGESO presented its internal impact assessment as a starting point and then provided the Issue Group with an opportunity to contribute any other actual or perceived barriers to entry. The internal impact assessment was carried out across a range of internal areas, including Codes, control room, IT and Settlement systems.

The key barriers identified in the impact assessment were:

- ACER EB GL decision on 18 June 2020
- Existing Control Room BM systems only allow integer-scale bids

NGESO's internal impact assessment can be found in Attachment A of this Issue Report.

European Network Codes

On 18 June 2020, ACER (Agency for the Cooperation of Energy Regulators – authorised to make determinations in line with EU legislation), published [2 decisions](#) on EB GL (European Balancing Guidelines). The [European Union \(Withdrawal Agreement\) Act](#) stated that all ACER decisions prior to the end of the Brexit Implementation Period would remain extant post Brexit. One of those decisions related to the methodology and list for standard products for balancing capacity. Bids relating to standard products have a minimum threshold of 1MW and can only be offered in 1MW increments (Article 5.1c and Article 5.2d). Specific products (products only required for GB) do not have to meet the same criteria. Products which were previously slated to become specific products are now automatically specific products following Brexit and subsequent changes to UK law. Examples include reserve products such as Short Term Operating Reserve (STOR) and Fast Reserve.

A process for approval of specific products has been agreed with Ofgem since, creating a route to resolve this potential barrier.

Control Room Systems

ESO Control Room BM systems have been built with traditional power stations in mind and have a hard coded integer limitation for despatch. Due to the nature of the system this isn't something that could easily be amended.

However, the [NGESO Balancing Programme](#) aims to deliver new IT tools into the control room by 2025 that includes the ability to submit decimal granularity bids.

Existing Code Modifications

These are the existing related Balancing and Settlement Code (BSC) and Grid Code (GC) Modifications which were explained in brief by Elexon and NGESO respectively, to signpost Issue Group Members to where they can find out more information about the existing related Code Modifications.

Existing related BSC Modifications

- [P362 'Introducing BSC arrangements to facilitate an electricity market sandbox'](#)
- [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#)
- [P376 'Utilising a Baselining Methodology to set Physical Notifications'](#)
- [P379 'Enabling consumers to buy and sell electricity from/to multiple providers through Meter Splitting'](#)
- [P412 'Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy'](#)
- [P415 'Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties'](#)

Existing related Grid Code Modifications

- [GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements](#)
- [GC0134: Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism](#)
- [GC0139: Enhanced Planning-Data Exchange to Facilitate Whole System Planning](#)
- [GC0140: Grid Code Sandbox: enabling derogation from certain obligations to support small-scale trials of innovative propositions](#)
- [GC0148: Implementation of EU Emergency and Restoration Code Phase II](#)

Review of potential existing barriers to entry

NGESO presented on a number of areas where there could be existing barriers to entry.

Overview of entry requirements into the BM – NGESO End-to-End process

NGESO presented an outline of the steps in the current NGESO BM Registration process:

1. Participant contacts NGESO's Contracts/Compliance Team to register interest
2. NGESO's Contracts/Compliance Team collate contact and Balancing Mechanism Unit (BMU) details
3. NGESO's Contracts/Compliance Team send details to NGESO's Registration Team
4. NGESO's Registration Team assign BMU id and Trading Agent id
5. NGESO's Registration Team send Registration forms to Participant for additional details, i.e. location, Trading agent and Control Point contact details, etc.
6. Participant to seek Elexon approval if required
7. NGESO's Registration Team confirms

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- a. Network Model
 - b. Connectivity method
 - c. Telephony method
 - d. Ops Metering is in place and proven
8. NGESO's Registration Team setup services and confirm Electronic Dispatch Logging (EDL)/Electronic Data Transfer (EDT) (or Wider Access Application Programming Interface (WAAPI)) links are established and proven. EDL/EDT can take up to six months to install
 9. All connectivity needs to be tested and certificate issued
 10. NGESO's Registration Team confirm to NGESO's Contracts/Compliance Team registration is complete
 11. NGESO's Contracts/Compliance Team issue approval for operations

Overview of NGESO Balancing Programme

NGESO presented an overview of the [NGESO Balancing Programme](#).

NGESO explained that the [NGESO Balancing Programme](#) is due to be delivered in 2025 and this would look at allowing decimal bids (i.e. bids at a greater granularity than the current whole number MW constraint) in BM systems. The Workgroup asked NGESO for early engagement with industry on this programme and to learn from the lessons of previous programmes.

The Workgroup were asked to consider their views on decimal bids. A majority of Workgroup Members believe that 1 decimal place would be appropriate, i.e. bids should have a minimum size and granularity of 100 kW. However, a Workgroup Member suggested that to future-proof the solution, more decimal places could be considered. There was broad agreement of this principle, but it was noted that there would need to be cost/benefit analysis undertaken to determine the value of this.

NGESO explained that the bulk of engagement was from [NGESO's Technology Advisory Council \(TAC\)](#), which has a wide range of group members, including an Exelon representative, and is taking a holistic approach. The [NGESO Balancing Programme](#) will be a regular discussion point at the TAC.

NGESO explained that Issue Group Members and industry can contact [.box.balancingprogramme@nationalgrideso.com](mailto:box.balancingprogramme@nationalgrideso.com) with any queries.

Workgroup discussion on additional barriers to entry

The Workgroup were invited to identify any barriers to entry faced by small scale flexibility providers, in addition to those presented by NGESO.

The barriers identified included:

- Requirement to be HH settled to participate in the BM
- Physical constraints (if a site is located in an Automated Network Management (ANM) area it is limited to what services it can offer)

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- End-to-end capability testing
- Compliance
- Metering

These were noted by NGESO at the first Issue Group meeting and taken away and then presented by NGESO at the second Issue Group meeting. These are covered below.

Metering System Identifier (MSID) Pair registration

A Workgroup Member raised a question about how regularly sites can be added to a flexibility portfolio. It was noted that MSID Pair registration takes 5 working days, as referenced in [BSC Guidance Note 'Virtual Lead Party \(VLP\) – entering the market'](#) and this timescale was to allow for any objections from moving from one VLP to another. The Workgroup asked Elexon to check how often there had been objections. Elexon confirmed that there have been no objections to MSID Pair registration. However, it is worth noting that to date there have been a low number of MSID Pair registrations.

Metering

NGESO explained that they are reviewing standardisation of operational metering across balancing services and that they are engaging with the Department for Business, Energy and Industrial Strategy (BEIS) and industry stakeholders on the best way to do this.

NGESO explained that a leading consideration is using Code of Practice 11 (CoP11) metering standards for operational metering accuracy for Balancing Services.

This work aims to standardise criteria such as read frequency and meter accuracy, which simplifies metering solutions for service providers whilst providing the ESO with the data required to ensure grid security and system operability.

At the time of writing, CoP11 hasn't gone live, but is due to be included as part of [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#) which is due to be implemented of 30 June 2022. The CoP11 document can be found on the [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#) webpage. At its meeting in December 2020, the BSC Panel approved the document in its current form and would therefore be subject to its own change process should any further changes be required.

In parallel, NGESO is reviewing the approach to aggregated metering rules for sub units in the BM.

NGESO explained that Issue Group Members and industry can contact box.futureofbalancingservices@nationalgrideso.com with any queries.

Physical barriers to entry

NGESO explained that the challenges for distribution Automated Network Management (ANM) connected parties (flexible connections that either limit the capacity that can be exported or imported or the times in which this can take place) to provide flexibility services and balancing services has been recognised by the [Energy Networks Association's \(ENA\) Open Networks Project](#).

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Based on stakeholder feedback the Project has prioritised three pieces of work in 2021 (Product 3: Principles to review Flexible Connection (Active Network Management) contracts, Product 8: Apportioning Curtailment Risk for Flexible Connections (ANM) and Product 9: Strategy for improving the availability of Curtailment Information for Flexible Connections (ANM)) to improve arrangements for Flexible Connections from Distributed Energy Resource (DER), which are usually connected to ANM schemes. It should be noted that the Products are focused on distribution issues rather than facilitating ANM connected parties' provision in balancing services.

The [Open Networks Project Flexibility Consultation](#), which was published in July 2021, included these three areas and invited stakeholder views on potential options.

The ESO has recently undertaken a Network Innovation Allowance (NIA) project looking into the provision of balancing services by flexible connections.

Further details on the ENA's Open Networks Project can be found on dedicated pages on the [ENA website](#).

NGESO explained that for questions on ANM and/or tertiary connections, Issue Group Members and industry can contact .box.wholeelectricitysystem@nationalgrideso.com with any queries.

4 Conclusions

There were two Issue 94 Workgroup meetings held, on [26 May 2021](#) and [5 August 2021](#). The conclusions of the Issue 94 Workgroup can be found below.

The Workgroup were asked to consider:

- Are any Grid Code (GC) or Connection and Use of System Code (CUSC) Modifications required from Issue 94?
- Are any BSC Modifications or Change Proposals (CPs) required from Issue 94?
- Are any consequential BSC Modifications or Change Proposals required from Issue 94 as a result of Grid Code or CUSC Modifications?

The Workgroup concluded that no Code Modifications or Change Proposals are required from Issue 94, but that there could be future direct or consequential Code Modifications required as part of the work to remove barriers to entry to the Balancing Mechanism.

NGESO were keen to engage with industry and had therefore shared relevant contact details with the Issue Group. These are summarised below:

NGESO contact details	
Area	Contact details
Balancing Programme	.box.balancingprogramme@nationalgrideso.com
Metering	.box.futureofbalancingservices@nationalgrideso.com
ANM and/or tertiary connections	.box.wholeelectricitysystem@nationalgrideso.com

NGESO is embarking on programmes of work and will further engage with industry. The engagement through Issue 94 has been in support of NGESOs initial engagement exercise with industry.

Appendix 1: Issue Group Membership

Issue Group membership and attendance

Issue 94 Group Attendance			
Name	Organisation	26 May 21	5 Aug 21
Elliott Harper	Elxon (<i>Chair</i>)	✓	✓
Paul Wheeler	Elxon (<i>Lead Analyst</i>)	✓	✓
Chris Welby	Elxon (<i>Design Authority</i>)	✓	✗
Callum Chalmers	Elxon (<i>Design Authority</i>)	✗	✓
Katharina Birkner	National Grid ESO (<i>Proposer</i>)	✓	✗
Sean Donner	National Grid ESO (<i>Proposer</i>)	✓	✓
Stuart Brace	National Grid ESO (<i>Subject Matter Expert</i>)	✓	✗
Tony Johnson	National Grid ESO (<i>Subject Matter Expert</i>)	✗	✓
Andrew Colley	SSE	✓	✗
Augustin Sanson	Voltalis	✓	✗
Beth Warnock	ES Catapult	✓	✓
Catarina Araya Cardoso	Westminster Business School	✓	✗
Charlotte Johnson	Upside Energy	✓	✓
Claire Addison	Flexitricity	✓	✓
Eleonore Glendinning	Voltalis	✓	✓
Graz Macdonald	Waters Wye Associates	✓	✓
Helen Stack	Centrica	✓	✓
Kailin Graham	The Association for Decentralised Energy	✓	✓
Liam Breathnach	SMS	✓	✗
Michael Evans	Moixa	✓	✓
Natalie Jones	United Utilities	✓	✗
Paul Farmer	Shell Energy Retail	✓	✗
Rosie McGlynn	Mentone Energy	✓	✓
Sebastian Blake	Open Energi	✓	✗
St.John Hoskyns	Carbon Point	✓	✓
Taimoor Zaman	Centrica	✓	✗
Valts Grintals	Kaluza	✓	✗
Alexandra Marshall	United Utilities	✗	✓

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Issue 94 Group Attendance

Name	Organisation	26 May 21	5 Aug 21
Ray Arrell	Regen	✗	✓
Silke Goldberg	Herbert Smith Freehills	✗	✓
Chris Wood	Elxon (<i>Subject Matter Expert</i>)	✓	✓
Jenny Sarsfield	Elxon (<i>Observer</i>)	✓	✗
Katie Wilkinson	Elxon (<i>Subject Matter Expert</i>)	✗	✓

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Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
ACER	Agency for the Cooperation of Energy Regulators
ANM	Automated Network Management
BEIS	Department for Business, Energy and Industrial Strategy
BM	Balancing Mechanism
BMU	Balancing Mechanism Unit
BSC	Balancing and Settlement Code
CoP	Change of Practice
CP	Change Proposal
CUSC	Connection and Use of System Code
DER	Distributed Energy Resource
EBGL	European Electricity Balancing Guidelines
EDL	Electronic Dispatch Logging
EDT	Electronic Data Transfer
ENA	Energy Networks Association
ESO	Electricity System Operator
EU	European Union
GB	Great Britain
GC	Grid Code
GSP	Grid Supply Point
HH	Half Hourly
MARI	Manually Activated Reserves Initiative
MSID	Metering System Identifier
MW	Megawatt
NGESO	National Grid Electricity System Operator
NIA	Network Innovation Allowance
PGM	Power Generating Module
STOR	Short Term Operating Reserve
TAC	Technology Advisory Council
TERRE	Trans European Replacement Reserve Exchange
TSO	Transmission System Operator
UK	United Kingdom

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Acronyms	
Acronym	Definition
VLP	Virtual Lead Party
WAAPI	Wider Access Application Programming Interface

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3, 5, 7	NGESO Balancing Programme	https://www.nationalgrideso.com/industry-information/codes/balancing-settlement-code-bsc/balancing-programme-update
3, 5	ACER decisions on EBGL	https://documents.acer.europa.eu/Official documents/Acts of the Agency/Individual%20decisions/ACER%20Decision%2011-020%20on%20standard%20products%20for%20balancing%20capacity.pdf
3	Commission Regulation (EU) 2017/2195 'Establishing a Guideline on electricity balancing'	https://www.legislation.gov.uk/eur/2017/2195/contents/adopted
4, 6, 8	P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'	https://www.elexon.co.uk/mod-proposal/p375/
4, 6	P376 'Utilising a Baseline Methodology to set Physical Notifications'	https://www.elexon.co.uk/mod-proposal/p376/
4, 6	P415 'Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties'	https://www.elexon.co.uk/mod-proposal/p415/
5	European Union (Withdrawal Agreement) Act	https://www.legislation.gov.uk/ukpga/2020/1/contents
6	P362 'Introducing BSC arrangements to facilitate an electricity market sandbox'	https://www.elexon.co.uk/mod-proposal/p362/
6	P379 'Enabling consumers to buy and sell electricity from/to multiple providers through Meter Splitting'	https://www.elexon.co.uk/mod-proposal/p379/

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Page(s)	Description	URL
6	P412 'Ensuring non-BM Balancing Services providers pay for non-delivery imbalances at a price that reflects the real-time value of energy'	https://www.elexon.co.uk/mod-proposal/p412/
6	GC0117: Improving transparency and consistency of access arrangements across GB by the creation of a pan-GB commonality of PGM requirements	https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0117-improving-transparency-and
6	GC0134: Removing the telephony requirements for small, distributed and aggregated market participants who are active in the Balancing Mechanism	https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0134-removing-telephony-requirements-small
6	GC0139: Enhanced Planning-Data Exchange to Facilitate Whole System Planning	https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0139-enhanced-planning-data-exchange
6	GC0140: Grid Code Sandbox: enabling derogation from certain obligations to support small-scale trials of innovative propositions	https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0140-grid-code-sandbox-enabling-derogation
6	GC0148: Implementation of EU Emergency and Restoration Code Phase II	https://www.nationalgrideso.com/industry-information/codes/grid-code-old/modifications/gc0148-implementation-eu-emergency-and-0
7	NGESO's Technology Advisory Council	https://www.nationalgrideso.com/who-we-are/stakeholder-groups/technology-advisory-council
8	BSC Guidance Note 'Virtual Lead Party (VLP) – entering the market'	https://www.elexon.co.uk/guidance-note/virtual-lead-party-vlp-entering-the-market/
8	ENA's Open Networks Project	https://www.energynetworks.org/creating-tomorrows-networks/open-networks/
9	ENA's Open Networks Project Flexibility Consultation	https://www.energynetworks.org/industry-hub/resource-library/on21-ws1a-flexibility-consultation-2021-overview-(30-jul-2021).pdf
9	Energy Networks Association	https://www.energynetworks.org/
10	Issue 94 Workgroup 1	https://www.elexon.co.uk/meeting/issue-94-workgroup-1/

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10	Issue 94 Workgroup 2	https://www.elexon.co.uk/meeting/issue-94-workgroup-2/