

Report Phase Consultation Responses

P431 'Post Brexit Agreement Updates'



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

This Report Phase Consultation was issued on 13 December 2021, with responses invited by 5 January 2022.

Consultation Respondents

| Respondent | Role(s) Represented |
|------------|---|
| NGESO | National Electricity Transmission System Operator |

P431
Report Phase Consultation
Responses

6 January 2022

Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P431 should be approved?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|--|
| NGESO | Yes | <p>This aligns with BSC objective E, Compliance with the Electricity Regulation, and any relevant legally binding decision of the European Commission and/or the Agency as The United Kingdom left the European Union on 31 January 2020.</p> <p>As GB is no longer part of the Internal Energy Market, the BSC should be updated to reflect that change. This relates to BSC objective D, which is promoting efficiency in the implementation of the balance and settlement arrangements by ensuring the detail within the BSC is updated to appropriately reflect this change.</p> |

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P431?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|---|
| NGESO | Yes | We have reviewed the legal text changes and believe it delivers the intent. |

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

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|--|
| NGESO | Yes | We support this change being progressed into the next suitable release. It is our understanding that the June release is the next available release which this change can be included in (30 June 2022). |

Question 4: Do you agree with the Panel's initial view that P431 should be treated as a Self-Governance Modification?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|--|
| NGESO | Yes | Due to this being an administrative change only, our view is that this modification should be treated as a self-governance modification. |

Question 5: Do you agree with the Panel's initial recommendation that P431 does not 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 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|--|
| NGESO | Yes | We do not believe that this change has any impact on EBGL Article 18 terms and conditions held within the BSC. |

Question 6: Will P431 impact your organisation?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 0 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|-----------|
| NGESO | No | |

Question 7: How much will it cost your organisation to implement and operate P431

Responses

| Respondent | Rationale |
|------------|---|
| NGESO | We see this change as being an administrative change to the BSC and therefore there will be no costs to implement this change at NGESO. |

Question 8: Do you have any further comments on P431?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 0 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|------------|----------|-----------|
| NGESO | No | |