

ALL TSOS' PROPOSAL FOR CLASSIFICATION METHODOLOGY FOR THE ACTIVATION PURPOSES OF BALANCING ENERGY BIDS PURSUANT TO ARTICLE 29(3) OF COMMISSION REGULATION (EU) 2017/2195 ESTABLISHING A GUIDELINE ON ELECTRICITY BALANCING

Introduction

On 13 September, all European TSO's and ENTSO-E issued a public consultation on the classification methodology for the activation purposes of balancing energy bids, which can be found on the European Network of Transmission System Operators for Electricity (ENTSO-E) website [here](#).

The Activation Purposes proposal is a cross EU defined balancing product (RR - Project TERRE, mFRR - Project MARI, aFRR - Project PICASSO) proposal that defines how TSOs classify the purpose of the activation (i.e. a balancing action or a system action).

Format of this document

Responses to the consultation had to be in a set format loaded into a web interface on the ENTSO-E website.

This document was used to develop the ELEXON response in the format required and represents the submission made. We did not answer all the consultation questions. Only the questions to which ELEXON made a substantive response are listed below.

Matt Roper, 13 November 2018

Consultation Questions to which ELEXON responded and the ELEXON Response

1. Introduction

Q4. What types of organization do you represent? Other

Q5. If selected "Other", provide description of your organization

Third Party Market Operator (for further details please see Q19 general comments)

Q6. In which country is your organisational based? United Kingdom

Q7. Which is (are) your connecting TSO(s)? National Grid ESO

Q10. Please add here your feedback on Article 3 'Activation Purposes and Classification Criteria'

ELEXON welcomes and supports the proposed distinction made between balancing energy bids activated for balancing and those for system constraints.

A clear and unambiguous distinction in balancing energy bids activation purposes is critical as it enables ELEXON to be able to effectively deliver Great Britain's (GB's) electricity balancing settlement and imbalance settlement activities under the national GB Balancing and Settlement Code.

Q13. Please add here all general comments on the proposal

ELEXON Limited delivers the electricity balancing settlement, imbalance settlement and related data publication services that are critical to the successful operation of Great Britain's (GB's) current electricity trading arrangements under the national GB Balancing and Settlement Code. We are not a TSO, but we undertake and have been assigned operations that, in some other EU Member States, are undertaken by TSOs (see Europex documentation on Third Party Market Operators).

The views expressed in this consultation response are those of ELEXON Limited alone, and do not seek to represent those of the Parties to the GB Balancing and Settlement Code which we administer.

Our local TSO (National Grid) plans to use the EU Replacement Reserve product (implemented via Project TERRE) and the EU manual Frequency Restoration Reserve product (implemented via Project MARI). Both of which are impacted by the Activation Purposes Proposal and, subject to our NRA's approval, ELEXON will be incorporating these requirements into the existing GB settlement arrangements.

So in our view it is imperative that ENTSO-E and ELEXON closely engage and coordinate at all times on all requirement changes that the Activation Purposes Proposal is considering. This will enable ELEXON to incorporate them in a timely and consistent fashion. We believe this coordination and liaison is key to deliver an efficient / economic solution and in the best interests of end consumers.

END