

NCER TERMS AND CONDITIONS, THE SGU LIST, HIGH PRIORITY SGU LIST AND TEST PLAN CONSULTATION – RESPONSE PROFORMA

NGESO invites responses to the consultation by **17:00hrs, 18 December 2019**. The responses to the specific questions (below) or any other aspect of the sections for consultation can be provided by completing the following form.

Please complete this form regarding:

1. amended Terms and Conditions to act as defence and restoration providers and definition of the possibility of and conditions for aggregation. The consultation only applies to the mapping provided in relation to Article 4.2(a) and (b) in Annex 1 of the T&Cs.
2. amended SGU list in accordance with Article 4.2(c) and High Priority SGU list in accordance with Article 4.2(d). The consultation only applies to Appendix A and B of the System Defence Plan.
3. amended SGU list in accordance with Article 4.2(c) and High Priority SGU list in accordance with Article 4.2(d). The consultation only applies to Appendix A and B of the System Restoration Plan.
4. Proposal for the Test plan in accordance with Article 4.2(g).

Please return the completed form to box.europeancodes.electricity@nationalgrideso.com

Respondent:	Steve Wilkin
Company Name:	ELEXON Ltd.
Does this response contain confidential information? If yes, please specify.	No
Name of Consultation this response is in relation to:	Emergency and Restoration amended proposals for consultation, 18 November 2019

No	Question	Response (Y/N)	Response
1	Do you agree with the amendments to the T&Cs, the SGU list and High Priority SGU list? Please provide rationale.	Yes for T&Cs mapping to the BSC. (No comment otherwise.)	We agree with the mapping of 4(4)(b) terms for aggregation to the BSC as this aligns with the terms for aggregation from Electricity Balancing Guideline Article 18(4)(b) and 18(5)(c). These are the terms and conditions that allow the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to offer balancing services via the Balancing Mechanism or via TERRE.
2	Do you agree with the approach taken in the proposal for the Test plan? Please provide rationale.		No response.

No	Question	Response (Y/N)	Response
3	Do you agree that the proposal is consistent with the principle of minimum necessary change? please provide rationale		No response.
4	Do you have any other comments in relation to the proposal?	Yes	<p>(1) The terms and conditions ('the T&Cs') for Defence Service Providers and for Restoration Service Providers now includes, for the first time, a reference to the BSC. This brings those parts of the BSC within the scope of the NC ER amendment process, in the same way that parts of the BSC were brought within the EB GL Article 18 amendment process.</p> <p>We would therefore suggest that we need to discuss with you, Ofgem and industry the most efficient way to change these BSC provisions in future while also meeting the requirements of the NC ER, EB GL and BSC change processes.</p> <p>(2) Also we note that the System Restoration Plan, in particular, summarises parts of the BSC. Therefore if and when the relevant sections of the BSC are modified in future, this Plan may also need to change.</p>