

Report Phase Consultation Responses



P367 'Removal of obsolete Supplemental Balancing Reserve (SBR) and Demand Side Balancing Reserve (DSBR) arrangements'

This Report Phase Consultation was issued on 15 May 2018, with responses invited by 30 May 2018.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Drax Power Ltd	1/0	Generator
ScottishPower	2/2	Generator, Non Physical Trader, ECVNA, MVRNA

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P367 better facilitates Applicable BSC Objective (b) and (d) and so should be approved?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Drax Power Ltd	Yes	<p>We agree with the Panel's initial unanimous recommendation that P367 better facilitates Applicable BSC Objective (b) and (d) and so should be approved.</p> <p>Applicable Objective (b) – Positive</p> <p>Since SBR and DSBR provisions were removed from the NGET Licence on 25 November 2017, the removal of SBR and DSBR arrangements from the relevant BSC Code Sections and Code Subsidiary Documents would realign the BSC with the obligations set out in the Transmission Licence. This change will have a positive impact on the efficient, economic and co-ordinated operation of the National Electricity Transmission System.</p> <p>Applicable Objective (d) – Positive</p> <p>As the SBR and DSBR provisions are obsolete, the inclusion of SBR and DSBR arrangements in the BSC may be misleading. There is no need for ELEXON for consider SBR actions in the imbalance price calculation. Furthermore, Ofgem has requested that these provisions be removed from the BSC. This change will promote efficiency in the implementation of the BSC arrangements.</p>
ScottishPower	Yes	<p>We agree with the Panel that P367 better achieves Applicable Objective (d) as removing text that is no longer required from the BSC text improves clarity and reduces the possibility of error/misunderstanding. We also agree that P367 marginally better achieves Applicable Objective (a) by reflecting the removal of SBR and DSBR services from the operational arrangements. We believe that P367 is neutral against the other Applicable Objectives.</p>

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P367?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Drax Power Ltd	Yes	The removal of the SBR and DSBR arrangements from the legal text delivers the intention P367.
ScottishPower	Yes	We believe that the changes outlined in Attachment A deliver the objective of P367.

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

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Drax Power Ltd	Yes	We foresee no issues with the proposed Implementation Date.
ScottishPower	Yes	As the changes affect documentation only and SBR and DSBR services have already been removed from the Transmission Company's Licence, we agree that the proposed implementation date should coincide with the next BSC Release to incorporate significant documentation changes.

Question 4: Do you agree with the Panel's initial view that P367 should be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Drax Power Ltd	Yes	Removing the obsolete SBR and DSBR arrangements from the BSC and will not have a material effect on the matters referred to in the Self-Governance criteria and will not discriminate between different classes of Parties.
ScottishPower	Yes	We believe that P367 meets the criteria for Self Governance as SBR and DSBR services have already been removed from the Transmission Company's licence.

Question 5: Do you have any further comments on P367?

Summary

Yes	No
0	2

Responses

Respondent	Response	Rationale
Drax Power Ltd	No	N/A
ScottishPower	No	N/A