EB GL ARTICLE 18 AMENDMENT CONSULTATION – RESPONSE PROFORMA

NGESO invites responses to this consultation by **13:00 28th March 2019**. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following form.

Please complete this form regarding the proposal titled: "**Electricity Balancing Guideline (EB GL) Article 18: Terms and Conditions related to Balancing".**

Please return the completed form to europeancodes.electricity@nationalgrid.com

Respondent:	Saskia Barker
Company Name:	Flexitricity Limited
Does this response contain confidential information? If yes, please specify.	No

No	Question	Response
1	Do you agree with the approach taken in the proposal? Please provide rationale.	Yes, the proposals seem sensible. Flexitricity believes that it is best that as many of the terms and conditions that relate to non-BM balancing services remain in the Standard Contract Terms as possible. This is because non-BM BSPs are not party to the grid code or CUSC, and therefore it is difficult for them to propose changes to these documents, and therefore the terms and conditions. The Grid Code and CUSC are also very static documents and are not suited to the pace of change required in the development of new balancing services.
2	Do you have any comments on the proposal letter?	No
3	**Annex 1**: Do you have any comments on the mapping?	No
4	**Annex 2:** Do you have any comments on the summary of changes to the mapping?	No
5	**Annex 3:** Do you have any comments on the proposed changes to the code governance process?	No

No	Question	Response
6	**Annex 4:** Do you have any comments on the proposed changes to the standard contract terms?	Yes, Flexitricity agrees with National Grid's proposals. Particularly because as the document points out, many BSPs are not party to the codes, so having the Terms and Conditions for the service they are providing in the codes would not be appropriate. If the terms and conditions of balancing that are currently in the SCTs are moved to the codes, the parties providing the service would not be bound by them and also have no way of modifying them. The codes are also large and cumbersome to navigate if only a small section applies to you, and therefore present a barrier to entry for small providers.
7	**Annex 5:** Do you have any comments on the proposed implementation timelines?	No.
8	Do you have any other comments in relation to the proposal?	No.