

EB GL ARTICLE 26 PROPOSAL– RESPONSE PROFORMA

NGESO invites responses to this consultation by **23:59 Monday 17th June 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: “**EBGL Article 26: Proposal for Defining and Using Specific Products for balancing energy and balancing capacity**”.

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

Respondent:	Garth Graham
Company Name:	SSE Generation Ltd.
Does this response contain confidential information? If yes, please specify.	No

No	Question	Response	NGESO Feedback
1	<p>Do you agree with our proposal to maintain STOR and BM for Balancing?</p> <p>Please provide rationale.</p>	<p>In responding to this consultation, we note that our previous comments and concerns, provided to the TSO and NRA, regarding the terms and conditions related to balancing (according to Article 18 of EBGL, within the context of the other Articles of EBGL including, but not limited to, Articles 4, 5, 6, 10 and 62) are relevant for Article 26 and should be taken fully into consideration by the TSO (and NRA).</p> <p>Furthermore, we note from slide 8 of the TSO's presentation concerning this Article 26 consultation that, as per Article 26(3), <i>"The specific products shall be implemented in parallel to the implementation of the standard products."</i></p> <p>Given that the first Standard Product (associated with Project TERRE) is expected to 'go-live' across the Union shortly (albeit that the GB TSO has proposed to the NRA that the implementation date(*) slips to June 2020, from the TSO's previously proposed implementation date of April 2020) this means that this Article 26 proposal for Specific Products for GB will need to be in place in an appropriate timescale for Project TERRE 'go-live' in December 2019 (albeit that the GB TSO does not propose to contract for Project TERRE with GB BSPs/BRPs till 3-6 months later).</p> <p>(*) In respect of the Implementation date, we reiterate here our comments in our 28th March 2019 Article 18 submission to the TSO as to the legality of the TSO's proposed April 2020 (soon to be June 2020?) implementation date.</p>	<p>NGESO thanks SSE Generation Ltd for the feedback and have taken note of previous comments regarding Ts and Cs according to Article 18, which are being taken into account within that piece of work.</p> <p>NGESO agrees that the Article 26 proposal will need to be in place for the go-live of TERRE.</p>

No	Question	Response	NGESO Feedback
2	Do you have any other comments on the proposal?	<p>We note the acceptance by the TSO that Specific Products relate to <u>FCR</u>, FRR and RR balancing items are relevant to Article 26 and Article 18 matters.</p> <p>This contrasts with the TSO's Article 18 submission to the NRA of 4th April 2019 where the TSO had suggested that FCR matters did not fall within the vires of Standard or Specific Products.</p> <p>We agree with the NRA (in its 4th June 2019 Article 18 letter) that FCR (along with FRR and RR) does fall within the context of balancing Specific and Standard Products under EBGL.</p>	As per Ofgem's Article 18 letter dated 14 th June, NGESO are working to include FCR products within the scope of their amended Article 18 proposal.