national**gridESO**

TERRE Dispatch Instruction Guide Issue 1.0

14th March, 2019

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1.1 Document Change History

Version	Issued Date	Changes	Comments
0.1	30/01/2019	Issued for Internal Review	
0.2	20/02/2019	Incorporation of Review Comments	
0.3	06/03/2019	Incorporation of Review Comments	
1.0	14/03/2019	Issued for External Distribution	

1.2 Background

Replacement Reserve (RR) is an energy product defined within the Electricity Balancing Guideline (EBGL). The product will be traded across different Transmission System Operators (TSO) control regions, with a central European platform (Libra), responsible for scheduling the activation of the product and resultant energy flows across TSO boundaries.

BSC modification codes (P344) and Grid code (GC0097) were raised within Great Britain (GB) to facilitate the energy transactional changes arising from the EBGL within Great Britain.

National Grid ESO as the Transmission System Operator in Great Britain will as part of its obligations under the above-mentioned legislations, manage the Replacement Reserve (RR) bids, Libra accepted bids and issue resultant Replacement Reserve Instructions (RRI) to Balancing Service Providers (BSPs) without compromising the integrity of the UK energy grid and transmission systems.

1.3 Glossary of Terms / Abbreviations

Term	Meaning
Activation Period	Each 15-minute block within an Auction Period. Each Quarter may also be labelled Q1, Q2, Q3 & Q4 sequentially. Also, referred to as 'Delivery period' in some other publications
Auction Period	A period lasting one hour; starting and ending on the hour (e.g. from 10:00 to 11:00). Hence, there are 24 RR Auction Periods in a day
BEGCT	Balancing energy gate closure time.
вм	Balancing Mechanism
BM Gate	Gate Closure is a point one hour prior to the start of a Settlement Period. This is the point by which BSC parties must submit information to National Grid regarding their planned production or consumption in a Settlement Period
вми	Balancing Mechanism Unit
ВОА	Bid Offer Acceptances (A dispatch Instruction issued to a BSP from NG). Used to indicate BM market only instructions
BSP	Balancing Service Provider
CCL	Capped Committed Level
ESO	Electricity System Operator

FPN Final Physical Notification GC0097 Grid Code Modification Report Libra Platform The central European Replacement Reserve exchange platform where optimisation for replacement reserve market takes place. MEL Maximum export limit MW Megawatt NG National Grid Post Libra A term used to represent the events that take place after Libra optimisation PN Physical Notification PRCL Post Reserve Committed Level - the proposed new level for the one hour period covering the results of the Libra auction including the addition of ramps. In calculating this variable no BOAs are included. PRRL Post Replacement Reserve Level = FPN (Final Physical Notification) + RRA. For the avoidance of doubt, no ramps are applied at this stage. The PRRL will have discontinuities if the RRAs for given 15 minute periods are at different levels. In calculating this variable no BOAs are included. RR Replacement Reserve RRA Replacement Reserve Acceptance: The volume activated by Libra after optimisation for each Market Participant against each activation period. In this document and as defined in GC0097, RRA is also used as the MW offset RR Bids Replacement Reserve Bids: A submission by a Market Participant (registered to provide RR) covering the price and MW deviation to be offered into the TERRE auction RRI Replacement Reserve I		
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during a day.	RRI	Market Participants (registered to provide RR) in accordance with the
TSO Transmission Service Operator	Settlement period	
	TSO	Transmission Service Operator

1.4 Document Objective & Scope

This document will provide an insight on how National Grid will convert the Libra results (Replacement Reserve Acceptances (RRAs) into Replacement Reserve Instructions (RRIs) which will then be issued to the BSPs in form of BOA Instructions. It will capture in details, how the NGESO system will process each accepted bid to arrive at the resultant volume of energy that will be issued as an RRI.

It is intended that with the clarity provided within this document, BSPs will have a proper understanding of how RRAs will be processed to create the RRIs and hence align their bids and operational parameters accordingly.

The following workflow elements that complete a RR operational cycle are out of the scope of this document:

- Bid Submissions by BSPs
- Pre-Libra processing by NG

- Libra Optimisation
- Settlements
- Reporting

The reader is expected to consult other related publicly available publications for more details on the RR market and interactions with the Libra platform.

1.5 Referenced Documents

Refences have been made to the following documents listed below to arrive at the Dispatch Principles contained within this article.

Document Title and Version	Document Reference	Description
BSC Modification P344 Final Modification Report 19/6/18	P344	Changes to the BSC to implement wider access and RR
Grid Code Modification GC0097 Final Modification Report 26/6/18	Grid Code	Reference to the Grid Code as proposed in GC0097
Common Platform for Replacement Reserves Implementation Guide Version O 27/09/2018	TERRE Implementation Guide	ENTSOE Guide to the implementation of the TERRE Exchange
RR Implementation Guidelines (Issue 0.2)	National Grid Publication	Provides guide for Balancing Service Providers (BSP) intending to participate in RR market

2. Brief Process Overview

2.1 Post Libra – Operational Context

Libra will run an optimisation on all unrestricted bids submitted by the participating TSOs in an auction format, select the best priced bids and forward the result to the TSOs no later than 30 minutes prior to the next Auction Period. Refer to Section 5.2.5 of the "Common Platform for Replacement Reserves Implementation Guide" Version O for more details of Libra activation procedures.

National Grid's Balancing Mechanism (BM) System upon receiving and validating the auction results from Libra, will automatically create and send Replacement Reserve Instructions (RRIs) to the activated BMUs in line with the Replacement Reserve Acceptances (RRAs), the BMU's submitted operating parameters and the Dispatch Principles specified in details within this document. Refer to Section BC4.7 of the Grid Code for the regulatory specifications on instructing BM participants with Libra activations

2.2 Replacement Reserve Acceptance (RRA)

Issued by Libra to NG TSO no later than 30 minutes to the start of the Auction Period, the RRA contains the list of all activated bids for each quarter within the next TERRE Auction Period.

Each bid consists of a 15 minutes' block of either positive (generation) or negative (demand) energy. Ramps are not contained within the energy blocks. Refer to Section 5.3.6 (Table 6) of the "Common Platform for Replacement Reserves Implementation Guide" Version O for more details of an RRA content

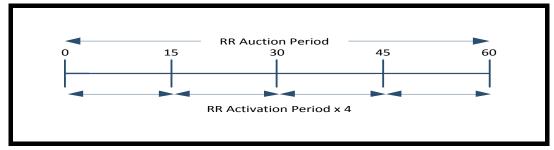


FIGURE 1 - TERRE Auction & Activation Periods

Figure 1 above shows an RR Auction Period and the timelines for the four activation periods contained therein.

It is expected that BSPs will submit operating parameters that will ensure that they meet any energy generation/demand obligations arising from Libra results.

Libra may issue RRAs that are in fractions of MWs. If this is the case, the BM system will convert the fraction to a whole number as follows:

Any fraction less than 0.5MW will be rounded down to the nearest whole number while any fraction that is equal to or greater than 0.5MW will be rounded up to the nearest whole number.

3. Dispatch Principles Underlying RRA Processing

To maintain consistency in processing Libra results and issuing the resultant but feasible RRIs, National Grid have added more detail to the dispatch principles outlined in Section BC4.7 of the Grid Code to determine how RRIs will be calculated under different operating conditions.

Most examples contained within this document covers positive RRA values (energy generation), but it is noteworthy to mention that the principles remain the same for negative RRA values (energy demand).

While the application of any of these principles is determined by various operating conditions and variables, the concept of Post Replacement Reserve Level and Post Reserve Committed Level applies to all RRAs.

<u>Note:</u> The profile of any RRI is determined from the corresponding Post Replacement Committed Level (PRCL). Refer to section 3.2 below for details on PRCL.

3.1 Post Replacement Reserve Level (PRRL)

The PRRL is the summation of the FPN and the RRA (when applying the volume of the RRA as a discrete uniform level across the activation period). On a flat PN the PRRL will have step changes if the RRAs for given 15 minute periods are at different levels. In calculating this profile, no pre-existing BOAs are included. Participant submitted import/export run up and down ramps rates are not applied while calculating the PRRL.

Example 1: For a TERRE Auction Period of 10:00 to 11:00 and a prevailing FPN of 100MW, the following RRAs were received for each activation period respectively:

Q1 = +30MW

Q2 = +50MW

Q3 = +70MW

Q4 = +60MW

Figure 2 below shows the PRRL for each activation period as well as the associated RRA.

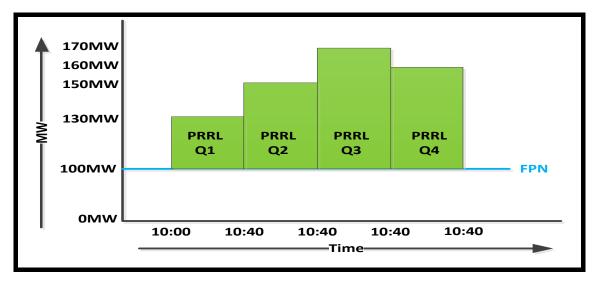


FIGURE 2 - PRRL for an Auction Period (10:00 to 11:00)

Example 2: For a TERRE Auction Period of 10:00 to 11:00 and a prevailing FPN of 100MW, the following RRAs were received for each activation period respectively:

Q1 = -70MW

Q2 = -80MW

Q3 = -60MW

Q4 = -40MW

Figure 3 below shows the PRRL for all the negative RRAs.

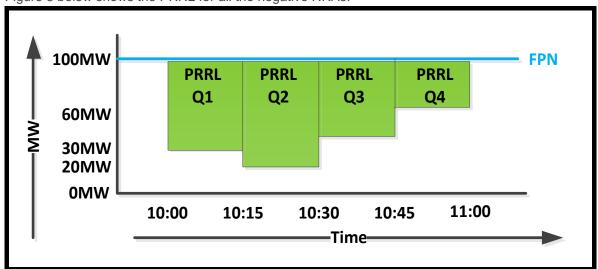


FIGURE 3 - PRRL the Negative RRAs

For more details on various types of acceptable bid, refer to RR Implementation Guidelines (Issue 0.2)

3.2 Post Replacement Committed Level (PRCL)

The PRCL is the unit's new level when the participants submitted import/export run up and down ramps rates have been applied to the PRRL. In calculating this level, any existing BM BOAs issued during the TERRE optimisation phase are not taken into consideration, rather the FPN at time of the RR bid submission is applied. The PRCL is essential as it forms the basis upon which the RRI profile is created.

When calculating the PRCL between PRRL blocks ramps will be applied. NG will adopt a "feasible" ramping methodology, similar to when BM BOAs are derived, and also allow a maximum run

up/down period of 10 minutes between the PRRL blocks. This implies that between PRRL blocks ramps will start between 1 and 5 minutes from the end of the preceding block and end between 1 and 5 minutes into the next block depending on ramp rates. The ramps rates used will be the prevailing run up and run down rates as submitted by the BSP. The PRCL will be capped by the MEL of the unit. The maximum 10-minute rule does not apply to the first and last PRRLs (Q1 & Q4) as up to 30 minutes is allowed for the first period Q1 (depending on the BMUs ramp rates). See section 3.2.1 and 3.2.2 below for more details on PRCL for Q1 and Q4. Refer also to TERRE Dispatch Principles Rule 3 in GC0097 Final Modification Report 26/06/2018.

Example 3: If the time needed to ramp up to the PRRL is 9.1 minutes, NG BM system shall round the ramping time to 10 minutes.

The red profile in the figure 4 below shows the PRCL of the four activation periods within an auction period.

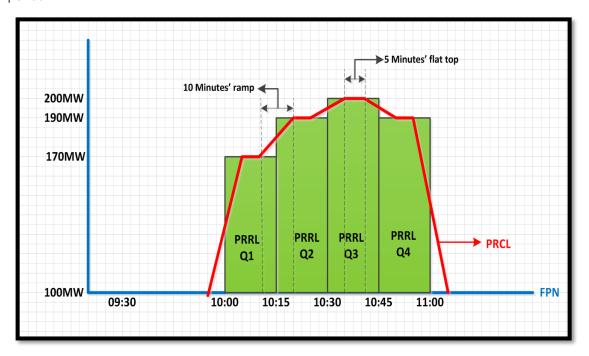


FIGURE 4 - PRCL for an Auction Period (10:00 to 11:00)

- **3.2.1** For the first activation period (Q1), RR allows up to 30 minutes' ramp time to the full PRRL. Therefore, NGESO Balancing Mechanism system will identify the correct ramp-up start point from the Capped Committed Level (CCL) (allowing up to 30 minutes ramping time) based on the BSP's ramp rate to ensure that the energy attained at the flat top of the PRCL is equal to, or as close as possible, to the RRA. Refer to TERRE Dispatch Principles Rule 4 in GC0097 Final Modification Report 26/06/2018. **See section 3.4.2** below for an exception to allowing 30 minutes' ramp time for the first activation periods (Q1)
- **3.2.2** For the last activation period in an Auction Period for which a non-zero RRA was received, there is no limit on the ramp down time. Therefore, National Grid's Balancing Mechanism system will construct the PRCL such that the unit will ramp down to meet the BMU's CCL upon completing a minimum of a five minutes' flat top energy delivery. Refer to TERRE Dispatch Principles Rule 5 in GC0097 Final Modification Report 26/06/2018
- 3.2.3 The PRCL for Q4 will always be created only after the BM gate adjacent to the current RR auction period has closed and the physical notification of the unit has become firm for the subsequent window. This is to ensure that a firm PN is referenced while creating the PRCL and associated ramp down. Refer to TERRE Dispatch Principles Rule 9 in GC0097 Final Modification Report 26/06/2018
- **3.2.4** In some situations, where a BMU has a very slow ramp and the calculated ramping period extends over 30 minutes, the PRCL may extend beyond the current gate, where the Physical Notification is not yet firm. While creating the closed ended RR instructions, the BM system will instruct the unit to ramp down and intersect with the CCL at a point where the PN is not firm. It has been identified that this could lead to 'hanging profiles' if the BSP keeps adjusting its PN prior to

ramp completion. NGESO will report such BSP to the relevant regulating bodies for disciplinary actions.

'Hanging Profile' is referred to a situating where the CCL changes post instruction making it impossible for the BMU to ramp down and intersect with the CCL in line with the issued instruction

Example 4: For an Auction Period of 10:00 to 11:00, the PRCL for Q4 (10:45 – 11:00) will not be created until 10:30 when the BM gate for 11:00 to 12:00 is closed and the PN becomes firm

3.3 PRCL Ramp Incentives (RR Standard Product Shape)

The TERRE market will incentivise RR instructions that ramp within +/-5 minutes of the start and end of the Auction periods. Energy delivered outside the standard allowable ramping period of 10 minutes, starting from 5 minutes before the activation period will not be paid for. See figure 5 below for details

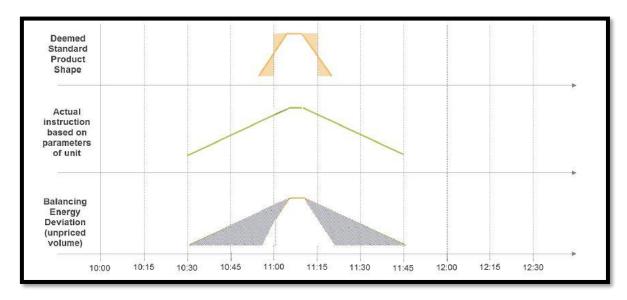


FIGURE 5 - Standard Product Shape

3.4 Interaction Between Adjacent Auction Periods

3.4.1 If two consecutive RRAs have been received for a BMU for auction periods 'A1' and 'A2, then the ramp for the first delivery period of A2 (Q1 of A2) could impact the amount of energy delivered in the later activation periods of A1 as the first ramp for Q1 of A2 may need to intersect with the prevailing PRCL.

See Example 5 below:

BMUs ramp rate for Auction Period 11:00 to 12:00 (A2) = 5MW per minute

FPN for both auction periods = 100MW

RRA for Q3 of A1 = +250MW

RRA for Q4 of A1 = +200MW

RRA for Q1 of A2 = +400MW

It can be seen from figure 6 below that the RRI required to deliver the energy for Q1 of A2 had to commence its ramp at 10:30. This is to allow up to 30 minutes' ramp time to achieve the +400MW energy requirement for Q1 of A2 as permitted by the TERRE market.

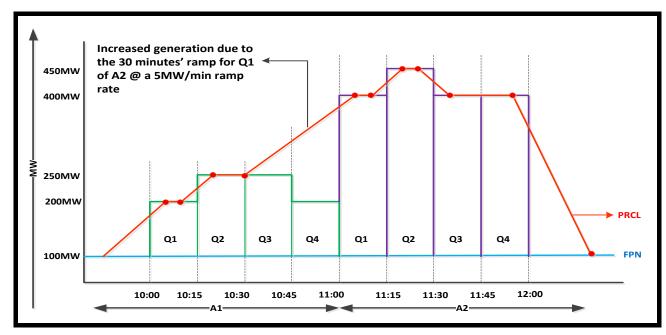


FIGURE 6 - Ramp Up Between Adjacent Auction Periods

3.4.2 For two consecutive auction periods 'A1' and 'A2 where the prevailing ramp down rate between Q4 of A1 and Q1 of A2 is not sufficient to achieve a 5 minute' flat top for Q1 of A2, NG's BM system will create a PRCL that allows a 5 minute 'stable' period within Q1 of A2 at a point higher than the PRRL.

Note: It is not feasible to allow 30 minutes' ramp time for Q1 of A2 because in this case, it entails a ramp down that will diminish the amount of energy generated in the remaining activation periods (Q3 & Q4) of A1.

See Example 6 below:

BMUs ramp down rate between A1 and A2 = 2.5MW/Min

FPN for both auction periods = 100MW

RRA for Q1 of A2 = +50MW

It can be seen from figure 7 below that a PRCL of ~75MW was created for Q1 of A2 because of the unit's inability to ramp down in a timely manner to intersect with the required PRRL of 50MW and still achieve a centralised 5 minutes' flat top within the activation period.

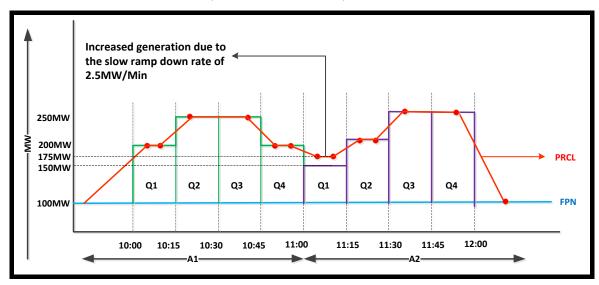


FIGURE 7 - Ramp Down Between Adjacent Auction Periods

3.5 Non-Symmetric PRCL

If the combined ramp up and ramp down time is an odd number less than 10 minutes (e.g. 9 minutes) then this will lead to time at which the PRCL is reached also being an odd number of minutes. In such instances, the PRCL shall be constructed such that the start of the PRCL is positioned closer to the start of the PRRL. Figure 8 below, shows an example of a BMU with a ramp time of 9 minutes from FPN to full load.

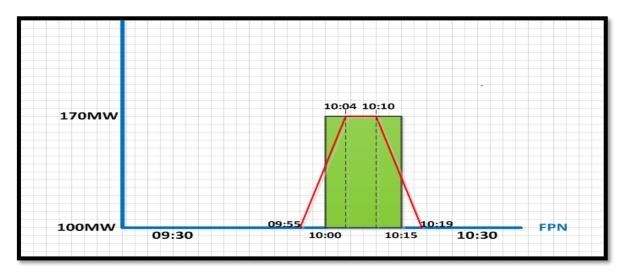


FIGURE 8 - Non-Symmetric PRCL

If the time to ramp to the PRRL is less than 10 minutes, the stable period of the PRCL may exceed 5 minutes so long as the total energy generated during ramp and within the PRRL is equal to a 15-minute block of energy as illustrated in the area under the curve from 09:15 to 10:19 in figure 8 above

The PRCL will be adjusted so the start and end times of the ramping periods achieve the best possible symmetry within -5/+5 minutes (e.g. -4/+4 minutes, -3/+3 minutes, -2/+2 minutes and -1/+1 minute) if the ramping duration is an even number less than 10 minutes

3.6 Insufficient Ramp Capacity

If it is infeasible to derive a PRCL that meets the PRRL, either the first PRRL or ramping between consecutive periods, allowing for the BMUs submitted ramp rates and the 10-minute ramp period rule, then a maximum possible PRCL will be generated. A detailed example (example 7) is illustrated in Figure 9 below:

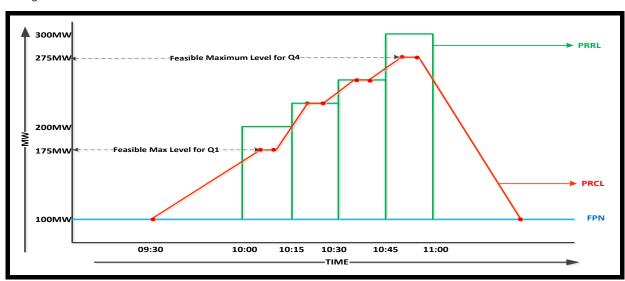


FIGURE 9 - Infeasible MW Capacity

Figure 9 above depicts the PRRL in green and the achievable PRCL depicted in red

Example 7: In this case,

RRA for the first delivery period (Q1) is +100MW

RRA for the second delivery period (Q2) is +125MW

RRA for the third delivery period (Q3) is +150MW

RRA for fourth delivery period (Q4) is +200MW

BMU ramp rate = 5MW/min

For Q1, only **75MW** is achievable within the maximum allowable ramp time of 30 minutes based on a 5MW/min ramp rate.

For Q4, only **275MW** is achievable within the maximum allowable ramp time of 10 minutes between two PRRLs

Note:

National Grid's BM System will construct the PRCL as indicated in the example above and will not attempt to alter any inconsistency associated with the ramp rates. It is assumed that the RR Provider will deal with this inconsistency or will ensure that their FPNs do not lead to this situation. "Refer to TERRE Dispatch Principles Rules 6 and 7 11 in GC0097 Final Modification Report 26/06/2018

If an RR Provider submits FPNs and TERRE bids resulting in infeasible results from the Libra auction they will be reported to the relevant regulating bodies and may have to withdraw from the TERRE process. "Refer to TERRE Dispatch Principles Rule 11 in GC0097 Final Modification Report 26/06/2018

3.7 Varying FPN within an Activation Period

If a BMU's FPN fluctuates within an activation period, leading to difficulties in deriving a PRRL & PRCL for the complete activation period, National Grid will manage this situation by breaking each affected activation period into smaller sections and creating a PRRL & PRCL for each section. This way, the effect of the dynamic nature of the FPN is minimised while also ensuring minimal deviation from the RRA value. A maximum of three PRRL can be created for each activation period in line with the TERRE Dispatch Principles Rule 10 Option C as specified in the GC0097 Final Modification Report 26/06/2018 See Example 7:

Assume the following Libra results: Q1 = +100MW, Q2 = +150MW, Q3 = +200MW & Q4 = +200MW.

It can be seen in Figure 10 below that the BMU's FPN around the first delivery period varies between 100MW to 200MW hence three separate PRRLs & PRCLs segments were created to minimise the impact of the changing FPN while minimising any variations to the 100MW required.

Therefore, implementing Rule 10, Option C, 3 equal volumes totalling the RRA (or as close as possible) separate target MW level of PRRL & PRCL will be created for the activation period 10:00 to 10:15 (Q1)

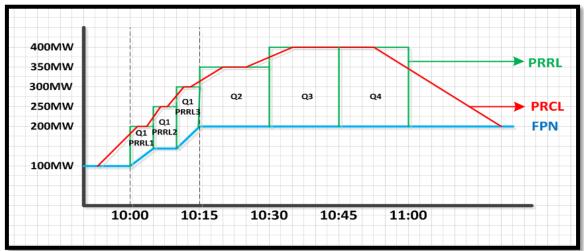


FIGURE 10 - Rapidly Changing FPN

3.8 Delivery Periods with RRA of Zero MW (0MW)

If the time between two delivery periods is not sufficient for a complete ramp down and ramp up for the next delivery period, NG's BM system will create a PRCL that allows a '**stable**' level (preferably 5 minutes') between the ramp down and ramp up period

See example 8 below:

A delivery period with no RRA (Q3) is between two non-zero RRA delivery periods (Q2 and Q4).

The BMU's ramp rate will not allow for a complete ramp down of Q2 from 325MW to the FPN of 100MW and ramp back up to 350MW for Q4 within 15 minutes.

Therefore, an additional generation of more than 225MW have been created in Q3 to enable the BMU ramp up to the required 350MW for Q4 although there was a zero RRA for Q3. See figure 11 below:

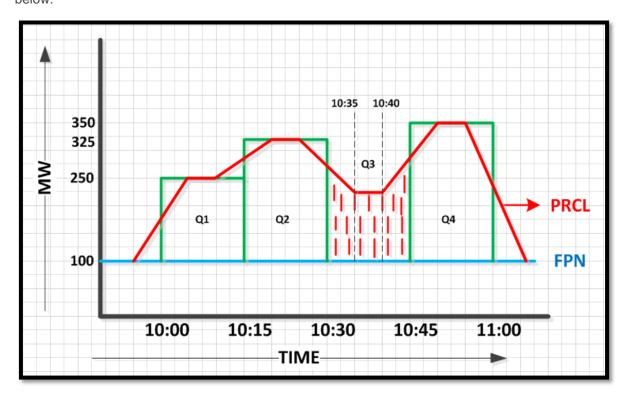


FIGURE 11 - Zero MW Delivery Period

Note:

NG BM System will work out the start and end points for the 'stable' level based on the BMU's ramp rate to allow for the delivery of the full MW required (or as close as possible) in the adjacent delivery period.

4. Generating Replacement Reserve Instructions (RRI)

RRI is a close ended BOA like instruction sent to BSPs by National Grid in response to an RRA. Refer to Section BC2.7.1 of the Grid Code for details of the content of a BOA.

An RRI of zero (0MW) will be issued to a BSP in the event of the PRCL being 0 (if the PRCL has been capped by a MEL of zero (0MW)). This is for ease of calculating settlement prices by Elexon.

After the PRCL has been generated, NG will send the appropriate RRI depending on the three conditions mentioned below:

 No BM BOA has been issued to the BMU prior to the receipt of the RR results for the prevailing auction period. See Section 4.1 below for more details

- ii. A BM BOA has already been issued to the BMU prior to the receipt of the results for the prevailing auction period and the BOA is in the same direction with all the RRAs for the same auction period. See Section 4.2 below for more details
- iii. A BM BOA has already been issued to the BMU prior to the receipt of the results for the prevailing auction period and the BOA is in the opposite direction to at least one of the RRAs contained in the same auction period. See Section 4.3 below for more details

4.1 No BOA has been issued to the BSP

When no BOA has been issued to the BMU prior to the receipt of the RRA, NG will issue an RRI that matches the profile of the corresponding PRCL for each activation period.

Example 9:

FPN = 100MW

Ramp Rate = 15MW/min

RRA Q1 = +150MW, RRA Q2 = +225MW, RRA Q3 = +225MW and RRA Q4 = +250MW.

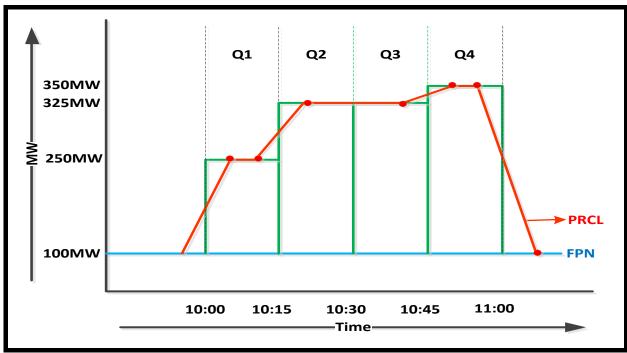


FIGURE 12 - RRI with no existing BOA

4.2 Pre-existing BOA in same direction

If an existing BOA is coincident with an auction period and the BOA is in the same direction (i.e. the net energy delivered in each activation period) with all the activated RRAs, the RRI volumes will be derived by calculating the difference between the PRCL and the prevailing BOA. There are two possible scenarios under this conditions as follows:

- a. The PRCL Target MW is greater than the existing BOA
- b. The PRCL Target MW is less than or equal to the existing BOA

"Refer to TERRE Dispatch Principles Rules 2 and 8 in GC0097 Final Modification Report 26/06/2018

4.2.1 PRCL level is greater than the existing BOA

If the PRCL level is greater than the BOA for an activation period(s), then the volume of RRI issued for the affected activation period(s) will be the derived by subtracting the volume of the existing BOA from the PRCL top level. See example 10 below:

Example 10:

FPN = **100MW**

BOA Issue Time = 09:22

BOA Deliver Time = 09:50 for 25 minutes, BOA = +100MW

Auction Period = 10:00 to 11:00

PRCL Q1 = +200MW, PRCL Q2 = +300MW, PRCL Q3 = +300MW and PRCL Q4 = +400MW

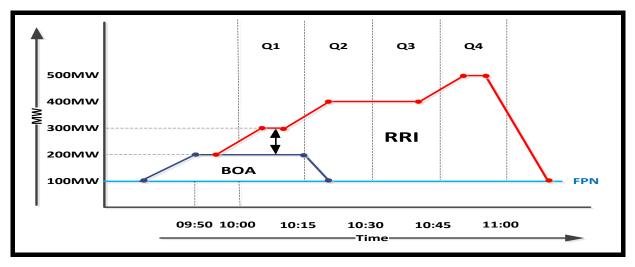


FIGURE 13 - RRI when PRCL is Greater than existing BOA

From figure 13 above, the **RRI** issued for **Q1** is: **100MW** (PRCL of 200 minus BOA of 100) See example 11 below (Section 4.2.2) for the impact of a BOA that ends midway into a delivery period

4.2.2 PRCL level is less than the BOA

If the PRCL volume is less than or equal to the existing BOA for an activation period(s), then the no RRI will be issued for the affected delivery period(s). See example 11 below:

Example 11

FPN = **100MW**

BOA Issue Time = 09:22, BOA Deliver Time = 09:50 for 30 minutes

BOA = **+200MW**

Auction Period = 10:00 to 11:00

PRCL Q1 = +150MW, PRCL Q2 = +250MW, PRCL Q3 = +250MW and PRCL Q4 = +300MW

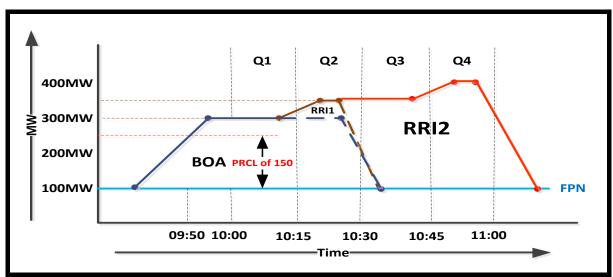


FIGURE 14 - RRI when PRCL is less than existing BOA

- From figure 14 above, NO RRI was issued for Q1 because the existing BOA (200MW) is greater than the PRCL of 150MW
- For Q2, two PRCLs were created (refer to section 3.7 above for details of multiple PRCL in one delivery period). In this case, the area under the brown curve is for an RRI of 50MW being the difference between the PRCL top level of 250 and the existing BOA of 200MW. The area in red is the RRI with no impact from an existing BOA

4.3 Pre-existing BOA in the Opposite direction

If an existing BM BOA issued to a BSP coincides in time with an auction period and the BOA is in the opposite direction, i.e. has a net overall negative volume, with any of the Libra activated RRAs for the same BSP, **No RRI** will be created. "Refer to TERRE Dispatch Principles Rule 1 in GC0097 Final Modification Report 26/06/2018. See example 12 and figure 15 below:

Example 12:

FPN = **200MW**

BOA Issue Time = 09:22, BOA Deliver Time = 10:05 for 25 minutes

BOA = -100MW

Auction Period = 10:00 to 11:00

RRA Q1 = +100MW, RRA Q2 = +200MW, RRA Q3 = +250MW and RRA Q4 = +250MW

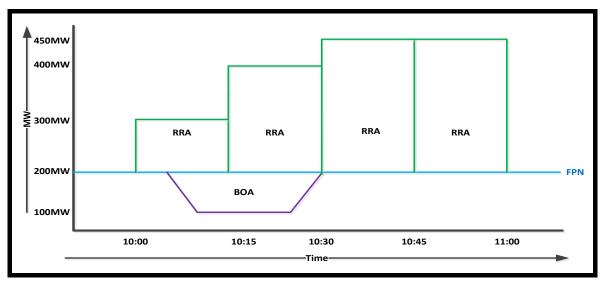


FIGURE 15 - BOA in Opposite Direction

4.4 RRI Acceptances

NGESO will expect to receive acceptances from RRIs within 2 minutes of sending the instruction in as specified in the Grid Code. See below:

Section 2.7.3 of the Grid Code states as follows:

Where a Bid-Offer Acceptance is not confirmed within two minutes or is rejected, NGET will seek to contact the Control Point for the BM Unit. NGET must then, within 15 minutes of issuing the Bid-Offer Acceptance, withdraw the Bid-Offer Acceptance or log the Bid-Offer Acceptance as confirmed. NGET will only log a rejected Bid-Offer Acceptance as confirmed following discussion and if the reason given is, in NGET's reasonable opinion, not acceptable and NGET will inform the BM Participant accordingly.

However, NGESO will **not** be able to contact every Control Point that fails to send an RRI 'confirmation' and will therefore "proxy accept" such RRIs.

As part of the "proxy accept" NGESO will deem the RRI as accepted by the BSP and will update the CCL of the affected BMU in accordance with the expected impact of the issued RRI.

Faraday House, Warwick Technology Park, Gallows Hill, Warwick, CV346DA

nationalgrideso.com

