National Grid ESO
Faraday House, Gallows Hill
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nationalgridESO

Scottish Power Renewables ODFM Terms and Conditions Consultation – Response Proforma

No	Question	Response	
1	Do you agree with the approach taken in the proposal? Please provide rationale.	Yes, we agree with the approach taken for mapping ODFM service into EBGL A18. We will encourage NGESO to keep progressing with market solutions that could remain standing in time and replace ODFM after summer 2020, in alignment with the implementation of GC0143. We believe that as long as DNOs has the capability to disconnect generation, on the back of GC0143, last resort market solutions should be in place and facilitate access to downwards flexibility at the distribution level.	We will use the feedback, seek further comments from the market and review learning in order to inform the design of an enduring footroom service as part of Reserve Reform. Already there is plenty of learning that will not only inform future Reserve products, but many of our projects to deliver our zero carbon 2025 ambition e.g. Regional Development Programmes.
2	Do you have any comments on the proposal letter?	No Comments.	
3	**Annex 1**: Do you have any comments on the highlighted mapping for ODFM service?	No Comments.	

4	Do you have any other comments in relation to the proposal?	We would encourage NGESO to provide some flexibility in regard to the ramping rates (minimum/maximum) data that needs to be populated and submitted through the service data template. We believe a more suitable parameter could be considered to replace ramp rates in order to facilitate an appropriate (an expected) response of the assets that supports the system operation at the time of dispatch. In the same line, we would also welcome NGESO to consider an alleviation, or revision, of the penalisation clauses to account for a substitution or redefinition of ramp rates in order to give providers the opportunity to propose suitable response solutions to the System Operator.	ESO have introduced a +/- 10% delivery tolerance for all participating units. This has been introduced following feedback that the penalty structure was viewed as very challenging and offered no room for error on delivery. By introducing this threshold, it offers parties some flexibility on minor deviations without impacting the entire instructions payment. This should encourage parties to continue to deliver the service should parties experience any minor delivery variation or metering errors. Many parties have expressed concerns to us over the severity of the impact of the penalty associated to ramp rates ESO have added a new clause on ramp rates to expand on feedback we received around the need for enhanced clarity and processes associated with ramp rates. Most the feedback ESO received as part of the consultation was associated to the impact of deviating outside of the min and max ramp rates had on the payment of the instruction (no payment for entire instruction the consequence). Whist the intention of this clause was to encourage parties to stick to their submitted parameters ESO recognise that it has had some unintended consequences. ESO have amended the service payment clauses so that we reserve the right to withhold 50% of the service fee for settlement periods impacted by poor ramping but allows parties to still receive full

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			payment for periods that are subsequently successfully delivered as per their instructed volume. This should encourage parties to continue to deliver where possible even if they experience ramping challenges.