National Grid ESO
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nationalgridESO

Innogy Renewables UK - ODFM Terms and Conditions Consultation – Response

No	Question	Response	
1	Do you agree with the approach taken in the proposal? Please provide rationale.	Yes - but the duration of the service should be extended until end of September 2020 with the ability to extend to 25th October 2020. This will require an extension to the date set out in Article 14.3 of the ODFM Standard Terms version 2 (as published on 19th May 20209) Pease note the comments in question 2 below:	Despite it being unlikely that low demand periods would extend until late October, as a prudent system operator we implemented a sunset clause for GC0143 for 25th October 2020. This maintained maximum optionality whilst ODFM was launched and our understanding as to the impact of COVID-19 on demands developed. The need for an optional service was judged as likely until at least end August, and possibly into September which is why the ODFM service terms cease on 31st August with a clause to extend by one month if required. Feedback from the market has highlighted the inconsistency in these two approaches and as a prudent system operator we agree that it is appropriate for the ODFM terms to mirror the cease date of GC0143. As such, the terms will be extended until 25th October 2020. As this is an optional service, providers who do not wish to offer their service beyond 31st August can opt out by no longer offering their availability into this service after such time.
2	Do you have any comments on the proposal letter?	If this service is intended to mitigate the need for emergency instructions – then the period the service could cover should mirror the length of time allowed under the GC0143 – ie should be extended until at least 25th October 2020 – as otherwise it is unclear how it could be used to mitigate the need for emergency instructions for last resort disconnection.	
3	**Annex 1**: Do you have any comments on the highlighted mapping for ODFM service?	No	

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4	Do you have any other comments in relation to the proposal?	With regards to the ODFM service – is the lower demand only due the impact of COVID19 or are the existing lower summer demand / Bank Holidays also an issue, in which case when are the future service parameters likely to be clarified.	It is dues to a number of variables but the 20% suppression we have seen from covid is a significant contributing factor. We will use the feedback from the market and review learning in order to inform the design of an enduring footroom service as part of Reserve Reform.