
David Wildash
Market Services - Senior Manager
David.Wildash@nationalgrideso.com
National Grid Electricity System Operator
www.nationalgrideso.com

12 August 2021

EBGL Article 18 Mapping: Short Term Operating Reserve

Dear Industry and Colleagues,

In accordance with Article 18 of COMMISSION REGULATION (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing (EBGL), National Grid ESO is required to consult on terms and conditions related to balancing.

This letter confirms updated [terms and conditions](#) for STOR. Detailed references to the service terms for the STOR services have been included in Table 1 in Annex A of this letter. Please note there are no changes to the mapping references contains in Table 1 of Annex A since the December consultation and the STOR EBGL Mapping Document remains unchanged

The document that has changed is the Assessment Principles and for ease a redline version showing these changes is available with the consultation documentation. The table below provides a summary of the changes made. All other contractual documentation remains unchanged:

Document name	Paragraph	Current detail	Changes made
Assessment Principles	Assessment Methodology section	Removal of references to 'not allowing overholding'	Additional detail included to cover inclusion of over- and under-holding in the assessment algorithm; Clarity that the algorithm will be updated to choose the cheapest of the 3 options – curtailable cost, overholding cost, underholding cost
Assessment Principles	Examples section	Examples 1-5 unchanged	Examples 6 and 7 added

If approved, these terms will then form part of the Article 18 terms and conditions as envisaged in CUSC section 4, paragraph 4.2B.5 and as required in that paragraph for any subsequent amendments to the terms to follow an amendment process which is compliant with the EBGL amendment process requirements.

Please review the documentation and provide your responses using the Consultation Proforma. The consultation shall close on the 13th September 2021, at 5pm. Your response should be sent to: box.europeancodes.electricity@nationalgrideso.com.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'David Wildash', with a stylized flourish at the end.

David Wildash
Market Services – Senior Manager

Annex 1

Amendment of EBGL Article 18 mapping to include Short Term Operating Reserve Terms and Conditions requirements

Please note: In accordance with EBGL Article 18, this table provides references to relevant parts of the GB codes and additional Service Terms which place obligations on registered service providers.

This document does not constitute compliance with Article 18 of the EBGL. Its purpose is to demonstrate where new Terms and Conditions STOR are in scope of EBGL Article 18 can be found. Where there is any conflict between this document, the Service Terms and GB Codes, the Service Terms and GB Codes shall take precedence.

Table 1

Below is the mapping of EBGL Article 18 with **highlighted** references for STOR services terms:

Article	Text	Code	Section
18.2	The terms and conditions pursuant to paragraph 1 shall also include the rules for suspension and restoration of market activities pursuant to Article 36 of Regulation (EU) 2017/2196 and rules for settlement in case of market suspension pursuant to Article 39 of Regulation (EU) 2017/2196 once approved in accordance with Article 4 of Regulation (EU) 2017/2196.	Grid Code	OC9.4
		BSC	G3
18.4	The terms and conditions for balancing service providers shall:	-	-
18.4.a	define reasonable and justified requirements for the provisions of balancing services;	SCT	FFR Section 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 and 3.13 STOR (Day Ahead) Service Terms – paragraphs 4, 5, 6, 7, 8, 9, 10, 11 and 19 FR section 2.2, 3.1, 3.2, 3.3, 3.4, and 3.10 EFR section 6 ODFM Service Terms – Section 5, 6, 7, 14.3 & 15

			<p>ODFM Service Terms- Section 1, 5, 6,</p> <p>DC Service Terms</p> <p>5-Service Availability</p> <p>6-Service Delivery</p> <p>7-Availability Payments</p> <p>15- Monitoring and Metering Data</p>
		BSC	BSC Section A, H3, H4.2, H4.7, H4.8, H5.5, H6, H10, J3.3, J3.6, J3.7 and J3.8
		CUSC	Section 4.1.3
18.4.b	<p>allow the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to offer balancing services subject to conditions referred to in paragraph 5 (c);</p>	BSC	K3.3, K8, S6.2, S6.3 and S11
18.4.b	<p>allow the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to offer balancing services subject to conditions referred to in paragraph 5 (c);</p>	Grid Code	DRSC 4.2, BC1.4
18.4.b	<p>allow the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to offer balancing services subject to conditions referred to in paragraph 5 (c);</p>		<p>DC Participation Guidance document</p> <ul style="list-style-type: none"> - Service parameters -Transitional Arrangements <p>DC Glossary</p> <p>Part 4 Dynamic Containment Specific Terms-</p> <ul style="list-style-type: none"> - Eligible Asset definition - Response Unit definition

18.4.c	allow demand facility owners, third parties and owners of power generating facilities from conventional and renewable energy sources as well as owners of energy storage units to become balancing service providers;	BSC	K3.2, K3.3, K8
18.4.d	require that each balancing energy bid from a balancing service provider is assigned to one or more balance responsible parties to enable the calculation of an imbalance adjustment pursuant to Article 49.	BSC	T4, Q7.2, Q6.4
18.5	The terms and conditions for balancing service providers shall contain:	-	-
18.5.a	the rules for the qualification process to become a balancing service provider pursuant to Article 16;	Standard Contract Terms	FFR 4 FR 4 STOR (Day Ahead) Guidance Document – Registration/Prequalification for STOR, Active Network Management Zones STOR (Day Ahead) Auction Rules - paragraph 4 EFR 5 ODFM Guidance Document – Service Parameters and Registration DC Participation Guidance Document -Service Parameters -Registration -Testing -Baselines -State of Energy -Data -Capacity Market

			-Active Network Management -Transitional Arrangements DC Tender Rules 4 Registration
		Grid Code	BC5, BC4.4.2
		CUSC	Section 4.1
		BSC	J3.3, J3.6, J3.7, J3.8, K3.2, K3.3 and K8

Article	Text	Code	Section
18.5.b	the rules, requirements and timescales for the procurement and transfer of balancing capacity pursuant to Articles 32, 33 and 34;	Standard Contract Terms	DC Participation Guidance Document Registration Tenders
			DC General Terms and Conditions 7- Assignments and transfer
			DC Tender Rules 5 – DC Tender Submissions 7 - Disqualification of DC Tenders 8 - Tender Assessment 9 - Acceptance and rejection 12 – Exceptional Circumstances
			STOR (Day Ahead) Guidance Document – Daily Auction

			<p>STOR (Day Ahead) Auction Rules - paragraphs 5, 7, 8 and 9</p> <p>STOR (Day Ahead) Assessment Principles</p> <p>STOR (Day Ahead) Service Terms - paragraph 20</p> <p>STOR (Day Ahead) General Terms and Conditions - paragraph 7</p> <p>FR section 2 FFR Section 2¹</p>
18.5.c	the rules and conditions for the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to become a balancing service provider;	Guidance document	<p>DC Participation Guidance Document</p> <p>Service Parameters</p> <p>Transitional Arrangements</p> <p>ODFM guidance document - service parameters section and registration section</p> <p>STOR (Day Ahead) Guidance Document - Registration/Prequalification for STOR</p>
		BSC	K3.3 and K8

¹ The obligations on BSPs / BRPs associated with A34 transfer of balancing capacity (the process which would be followed to transfer obligations for providing balancing capacity) will be set out accordingly in SCTs/ code after the annual update process and is planned for December 2019. At the moment transfers only occur in the event of takeover of a company or a novation. .

		Grid Code	BC1.4 and BC1.A.10
18.5.d	the requirements on data and information to be delivered to the connecting TSO and, where relevant, to the reserve connecting DSO during the prequalification process and operation of the balancing market;	Standard Contract Terms	<p>DC Participation Guidance</p> <p>Registration Tenders Testing Settlement Baselines Data Transitional Arrangements</p> <p>DC General Terms and Conditions</p> <p>8 - Confidentiality and Announcements 18 – EMR</p> <p>DC Service Terms</p> <p>Section 5 Service Availability 5.1, 5.2, 5.3 Section 6 Service Delivery 6.2, 6.3, 6.4, 6.5 13 - Communication 15 - Monitoring and metering data</p> <p>STOR (Day Ahead) Guidance Document - Registration/Prequalification for STOR, Daily Auctions, Availability Declarations</p> <p>STOR (Day Ahead) Auction</p>

			<p>Rules – paragraphs 4, 5 and 11.3</p> <p>STOR (Day Ahead) Service Terms – paragraph 19</p> <p>FFR - Section 4.2</p> <p>Fast Reserve – Section 3.10.1 and 3.10.2</p> <p>EFR Section 5, 6.38 to 6.42</p> <p>ODFM Guidance Document – Registration</p>
		BSC	BSC Section O
		Grid Code	DRC, <i>BC5 BC1.4</i> ,
		CUSC	Section 4.1.3.14 and 4.1.3.19
18.5.e	the rules and conditions for the assignment of each balancing energy bid from a balancing service provider to one or more balance responsible parties pursuant to paragraph 4 (d);	BSC	T4
			<p>DC Service Terms</p> <p>16- ABSVD</p> <p>DC Participation Guidance Document Settlement</p>
18.5.f	the requirements on data and information to be delivered to the connecting TSO and, where relevant, to the reserve connecting DSO to evaluate the provisions of balancing services pursuant to Article 154(1), Article 154(8), Article 158(1)(e), Article 158(4)(b), Article 161(1)(f) and Article 161(4)(b) of Regulation (EU) 2017/1485;	Standard Contract Terms	<p>DC Service Terms</p> <p>13 - Communication</p> <p>15 - Monitoring and metering data</p> <p>DC Tender Rules</p>

			4 - Registration 5 - DC Tender submissions
			STOR (Day Ahead) Service Terms – paragraph 19 FFR - Section 4 Fast Reserve – Section 3.10 EFR Section 6.38 to 6.42 ODFM Service Terms – Section 15
		Grid Code	Grid Code BC1.4, BC1.A.10,
		CUSC	4.1.3.19
18.5.g	the definition of a location for each standard product and each specific product taking into account paragraph 5 (c);	Grid Code	BC1.4
18.5.h	the rules for the determination of the volume of balancing energy to be settled with the balancing service provider pursuant to Article 45;	BSC	BSC T3
18.5.i	the rules for the settlement of balancing service providers defined pursuant to Chapters 2 and 5 of Title V;	Standard Contract Terms	DC Participant Guidance Document Settlement DC Service Terms 7- Availability Payments 8- Payment procedure Schedule 2 - Availability Payments DC General Terms and Conditions 4- Payments

		<p>STOR (Day Ahead) Guidance Document – Clearing Price. Settlement</p> <p>STOR (Day Ahead) Assessment Principles</p> <p>STOR (Day Ahead) Service Terms – paragraphs 10, 11, 12 and Schedules 1 and 2</p> <p>STOR (Day Ahead) General Terms and Conditions – paragraph 4</p> <p>FFR - Section 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.13 , and 5.2</p> <p>Fast Reserve – Section 3.1, 3.2, 3.3, 3.4, 3.10 and 5.3</p> <p>EFR Section 14</p> <p>ODFM Service Terms – Section 7, 8</p> <p>ODFM General Terms and Conditions – Section 4</p>	
		BSC	T1.14, T3 and U

		CUSC	Section 4.1.3.9 and 4.1.3.9A
18.5. j	a maximum period for the finalisation of the settlement of balancing energy with a balancing service provider in accordance with Article 45, for any given imbalance settlement period;	Standard Contract Terms	DC General Terms and Conditions 4- Payment STOR (Day Ahead) General Terms and Conditions – paragraph 4 FFR - Section 5.2 Fast Reserve - Section 5.3 EFR Section 14 ODFM General Terms and Conditions – Section 4
		BSC	U2.2
		CUSC	Section 4.3.2.6
18.5. k	the consequences in case of non-compliance with the terms and conditions applicable to balancing service providers.	Standard Contract Terms	DC General Terms and Conditions 6- Termination of Balancing Services Contracts DC Tender Rules 7- Disqualification of DC Tenders DC Service Terms 4, 5, 6, 11, 12, 14 5.5 - settlement period of unavailability 5.6 - complied with SOE rules 5.7 - Unable to meet requirements -

			<p>deemed unavailable</p> <p>6.5 - failure to prep baseline - deemed unavailable</p> <p>6.12 - non com SOE rules - deemed unavailable</p> <p>STOR (Day Ahead) Auction Rules – paragraph 4</p> <p>STOR (Day Ahead) Service Terms – paragraphs 9 and 18</p> <p>FFR - Section 3.6</p> <p>Fast Reserve – Section 3.3.18</p> <p>EFR Section 16</p>
		BSC	H3, Z7 and A5.2
		CUSC	Sections 4.1.3.9, 4.1.3.9A and 4.1.3.14
18.6	The terms and conditions for balance responsible parties shall contain:	-	-
18.6. a	the definition of balance responsibility for each connection in a way that avoids any gaps or overlaps in the balance responsibility of different market participants providing services to that connection;	BSC	K1.2, P3 and T4.5
18.6. b	the requirements for becoming a balance responsible party;	BSC	A, H3, H4.2, H4.7, H4.8, H5.5, H6, H10, J3.3, J3.6, J3.7, J3.8,, K2, K3.3 and K8

18.6.c	the requirement that all balance responsible parties shall be financially responsible for their imbalances, and that the imbalances shall be settled with the connecting TSO;	BSC	N2, N6, N8, N12, and T4,
18.6.d	the requirements on data and information to be delivered to the connecting TSO to calculate the imbalances;	BSC	BSC Section O, Q3, Q5.3, Q5.6, Q6.2, Q6.3, Q6.4
		Grid Code	BC1.4.2,3,4, BC1 Appendix 1 BC2.5.1,
18.6.e	the rules for balance responsible parties to change their schedules prior to and after the intraday energy gate closure time pursuant to paragraphs 3 and 4 of Article 17;	BSC	P2
		Grid Code	BC1.4.3,4,
18.6.f	the rules for the settlement of balance responsible parties defined pursuant to Chapter 4 of Title V;	BSC	T4, U2

Article	Text	Code	Section
18.6.g	the delineation of an imbalance area pursuant to Article 54(2) and an imbalance price area;		<i>GB constitutes one imbalance area and imbalance price area and they are equal to the synchronous area</i>
18.6.h	a maximum period for the finalisation of the settlement of imbalances with balance responsible parties for any given imbalance settlement period pursuant to Article 54;	BSC	U2.2
18.6.i	the consequences in case of non-compliance with the terms and conditions applicable to balance responsible parties;	BSC	H3, Z7 and A5.2
18.6.j	an obligation for balance responsible parties to submit to the connecting TSO any modifications of the position;	BSC	P2
18.6.k	the settlement rules pursuant to Articles 52, 53, 54 and 55;	BSC	T4, U2
18.6.l	where existing, the provisions for the exclusion of imbalances from the imbalance settlement when they are associated with the introduction of ramping restrictions for the alleviation of deterministic frequency deviations pursuant to Article 137(4) of Regulation (EU) 2017/1485.	Deterministic frequency deviation is a continental European concept and is not a characteristic of the GB system. Therefore, this requirement does not apply to GB.	N/A

Non- Mandatory elements

Article	Text	Comment
18.7. a	a requirement for balancing service providers to provide information on unused generation capacity and other balancing resources from balancing service providers, after the day-ahead market gate closure time and after the intraday cross-zonal gate closure time;	NG ESO does not expect to require this from Balancing Service Providers.
18.7. b	where justified, a requirement for balancing service providers to offer the unused generation capacity or other balancing resources through balancing energy bids or integrated scheduling process bids in the balancing markets after day ahead market gate closure time, without prejudice to the possibility of balancing service providers to change their balancing energy bids prior to the balancing energy gate closure time or the integrated scheduling process gate closure time due to trading within intraday market;	NG ESO does not expect to require this from Balancing Service Providers, except where balancing capacity or energy has been contracted. Although in the BM defaulting rules apply if data is not updated, there is no legal requirement for parties to offer unused generation capacity or any other balancing resource.
18.7.c	where justified, a requirement for balancing service providers to offer the unused generation capacity or other balancing resources through balancing energy bids or integrated scheduling process bids in the balancing markets after intraday cross-zonal gate closure time;	NG ESO does not expect to require this from Balancing Service Providers, except where balancing capacity or energy has been contracted. Although in the BM defaulting rules apply if data is not updated, there is no legal requirement for parties to offer unused generation capacity or any other balancing resource.
18.7. d	specific requirements with regard to the position of balance responsible parties submitted after the day-ahead market timeframe to ensure that the sum of their internal and external commercial trade schedules equals the sum of the physical generation and consumption schedules, taking into account electrical losses compensation, where relevant;	NG ESO does not expect to require this from Balancing Service Providers. No BSC party is required to contract to match its Final Physical Notifications (FPNs).
18.7. e	an exemption to publish information on offered prices of balancing energy or balancing capacity bids due to market abuse concerns pursuant to Article 12(4)	NG ESO does not expect to require this exemption. Such data is published on BMRS.
18.7. f	an exemption for specific products defined in Article 26(3)(b) to predetermine the price of the balancing energy bids from a balancing capacity contract pursuant to Article 16(6)	DC A derogation has been approved under Regulation (EU) 2019/943 Article 6(14) from the requirements of Regulation (EU) 2019/943 Article 6(2)

18.7. g	An application for the use of dual pricing for all imbalances based on the conditions established pursuant to Article 52(2)(d)(i) and the methodology for applying dual pricing pursuant to Article 52(2)(d)(ii).	NG ESO does not expect to apply for the use of dual pricing for all imbalances. A single imbalance price was adopted by the GB market in November 2015.
----------------	---	---