

B6 Constraint Management Pathfinder 2024/25 – Consultation Feedback Summary (28/03/2022)

Introduction

This summary aims to divide the feedback received in the B6 Constraint Management Pathfinder (CMP) 2024/25 consultation process into its key themes. In February 2022, National Grid Electricity System Operator (ESO) invited interested parties and stakeholders to provide feedback on the proposed Service Specification, Framework Agreement, and Standard Contract Terms (SCTs) for the B6 CMP 2024/25. Many thanks to everyone who took time to provide their thoughts during this consultation process. Below summarises the feedback received, as well as the ESO's position on the various topics and any resultant changes to the consulted documents.

Contract Extensions and Indexation

Feedback: The ESO need to be clear in relation to whether all contracts or some contracts can be extended, as the current wording of clauses 3.1 and 3.2 in the SCTs seem contradictory as to whether the ESO must extend all existing contracts or can pick and choose which contracts to extend.

ESO Position: In the interest of fairness, the ESO have updated the wording of clause 3.2 to reflect the fact that either all contracts are extended or no contracts are extended, meaning the ESO are unable to pick and choose which contracts to extend. However, as parties can reject the ESO's requests for an extension as set out in the revised SCTs, there may be scenarios where none of the contracts are extended, even though some parties had agreed to extend, or where only the parties that agree to extend have their contracts extended. For this reason, the ESO has also removed the indexation of the tripping fee from the updated SCTs, as parties are given an opportunity to reject the ESO's contract extension.

Extending B6 CMP 2023/24 Contracts

Feedback: If a party is successful in the B6 CMP 2024/25 and has previously been awarded a contract under the B6 CMP 2023/24 then it would save time in getting contracts signed if existing contracts can be extended.

ESO Position: Unfortunately the contract structure for the B6 CMP 2024/25 differs to the contract structure for the B6 CMP 2023/24 meaning it is not possible for existing contracts to be extended in lieu of signing the updated terms. However, as the B6 Constraint Management Intertrip Service Framework Agreement is evergreen, the ESO's expectation is that once signed for B6 CMP 2024/25, then there will be no need to re-sign again in future. The updated contract structure is an improvement following lessons learnt from the B6 CMP 2023/24 to help save time for both providers and the ESO moving forward.

Declaration of Maximum Export Limit (MEL)

Feedback: It is implied rather than expressly stated that parties must re-declare their Maximum Export Limit (MEL) following a trip.

ESO Position: The SCTs have been updated to expressly state that parties must re-declare their MEL to OMW following a trip. Please refer to the latest SCTs to understand the detail of the change.

Distribution Participation

Feedback: The focus remains on transmission-connected assets and has failed to open up the service to distribution-connected assets.

ESO Position: The ESO has engaged with distribution network operators (DNOs) through various forums to seek their guidance on connecting distributed generation to provide the B6 CMP service. The feedback from these forums to date has been that stringent technical requirements need to be set out to ensure system security, considering the constraint is driven by stability issues. These technical requirements (i.e. fast tripping time and redundancy) are unlikely to be met without significant investments in connecting and updating protection equipment for distribution-connected assets. Therefore, the B6 CMP 2024/25 service has not been extended to include distribution-connected assets, due to the complexity of meeting the technical requirements. However, distribution-connected assets are invited to participate in the Regional Development Programmes, where transmission and distribution network owners and operators have been collaborating to design new services to unlock additional network capacity and relieve constraints, as well as the Local Constraint Market, where the ESO is looking to access new sources of flexibility to help manage the B6 boundary. Please refer to the following webpages to understand more about the Regional Development Programmes <https://www.nationalgrideso.com/research-publications/regional-development-programmes> and the Local Constraint Market (<https://www.nationalgrideso.com/local-constraint-market>).

Intertrip Scheme for the B7a Boundary

Feedback: The Electricity Ten Year Statement (ETYS) shows B7a as the most constrained boundary in future, so is there a reason that this tender is not being designed based on the B7a boundary?

ESO Position: The intertrip scheme currently only works for the B6 boundary and not the B7a boundary. Following Network Options Assessment (NOA) recommendations, the ESO is working with the relevant Transmission Owners (TOs) to extend the intertrip scheme's capability to B7a as well. Once this has been implemented, the ESO should be able to update the service and accommodate assets located between the B6 boundary and the B7a boundary on the intertrip scheme.

Connection Dates

Feedback: Please can the requirement in relation to connection dates be relaxed, as the consulted B6 CMP 2024/25 Service Specification mandates that a bilateral connection agreement must have been signed prior to the Expression of Interest (EOI) submission deadline which is currently set at 22nd April 2022 (22/04/2022).

ESO Position: The ESO has liaised heavily with the TOs involved in the process to understand if this requirement can be relaxed whilst still providing sufficient information for the TOs to assess during the feasibility study stage of the process. The decision has been taken to relax the requirement, with the revised requirement reflected in the updated B6 CMP 2024/25 Service Specification.

Stacking with the Stability Pathfinders

Feedback: N/A

ESO Position: The ESO has decided to disallow stacking with the Stability Pathfinders for B6 CMP 2024/25. This decision has been taken because the operational impacts of using the services simultaneously in real-time need to be accurately assessed to understand associated risks and countermeasures, which is not something that the ESO's standard operational processes can currently accommodate. Please note that this position is being reviewed, with a view to potentially permit stacking with other Pathfinder services in future B6 CMP tenders.

Naming Convention of Contracts

Feedback: N/A

ESO Position: The ESO has decided to change the naming convention of the B6 CMP Framework Agreement and the B6 CMP SCTs to the B6 Constraint Management Intertrip Service (CMIS) Framework Agreement and the B6 CMIS SCTs respectively. This decision has been taken to future-proof the service for when it ceases to be a Pathfinder and is delivered through the ESO's business as usual processes. Please note that all references within the EOI documents to the B6 CMP Framework Agreement and the B6 CMP SCTs have been updated accordingly, but that the project itself shall continue to be named the B6 CMP for the remainder of the ongoing 2024/25 tender process to avoid further confusion.

Relevant Contract

Feedback: N/A

ESO Position: The ESO has previously stated that assets are unable to simultaneously provide the B6 CMP service alongside Reserve or Response services. The ESO has retained this position and updated the SCTs (see Clause 4.9) to state that parties must declare themselves unavailable for the B6 CMP service if contracted for the delivery of a Reserve or Response service, for the contracted period only.