

Balancing Principles Statement and Procurement Guidelines

Annual Industry Consultation

16 January 2009

Responses requested by 13 February 2009

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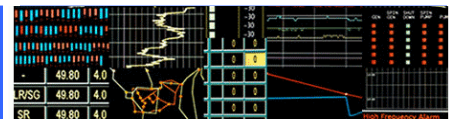
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1 Executive Summary

Purpose of this document

National Grid is conducting an annual review of the Balancing Principles Statement (BPS) and Procurement Guidelines (PGs), as required by Standard Condition 16 (C16) of its Electricity Transmission Licence.

National Grid is proposing minor changes to the BPS and PGs.

This consultation seeks industry views on the proposed changes in the BPS and PGs. National Grid also invites views on any other aspect of the BPS and PGs.

Consultation Process

The proposed changes to the BPS and PG are attached to this consultation in Appendices A and B respectively. The consultation document is available on National Grid's website and can be accessed by using the following link: <http://www.nationalgrid.com/uk/Electricity/Balancing/consultations/>.

Following receipt of responses to this consultation, National Grid will prepare and submit a report (in accordance with Licence Condition C16 paragraph 8) to the Authority. The industry responses and the consultation report will be published on the above link.

The current version of the BPS and PGs can be found at the following link: <http://www.nationalgrid.com/uk/Electricity/Balancing/transmissionlicensestatements/>

Consultation Timescales

In accordance with Licence Condition C16, the consultation period will be 28 days. Therefore the consultation timetable is as follows:

Consultation published	Friday 16 January 2009
Closing date for responses	Friday 13 February 2009



Consultation Report to the Authority	Friday 20 February 2009
Anticipated Authority decision by	Friday 20 March 2009
Implementation	Wednesday 1 April 2009

(subject to Authority approval)

How to respond

The consultation questions are summarised in a proforma in Appendix G. Please complete the proforma and send your responses to balancingservices@uk.ngrid.com by 13 February 2009.

Enquiries

If you wish to discuss any aspect of this document, please contact Shafqat Ali by emailing shafqat.r.ali@uk.ngrid.com or telephoning 01926 655980.

Document Structure

The remainder of this document is structured as follows:

- ❖ Purpose of the consultation
- ❖ Proposed changes
- ❖ Proposed implementation date
- ❖ Consultation responses
- ❖ Next steps
- ❖ Appendices
 - A. Summary of proposed 'in-house' technical changes to PGs
 - B. Summary of proposed 'in-house' technical changes to BPS
 - C. Marked-up PGs for proposed 'in-house' technical changes
 - D. Marked-up BPS for proposed 'in-house' technical changes
 - E. Marked-up PGs for proposed 'plain English' changes
 - F. Marked-up BPS for proposed 'plain English' changes
 - G. Consultation Questions
 - H. Feedback



2 Purpose of the Consultation

This section gives a background to the consultation and outlines the key change driver. It then provides details of how National Grid is aiming to improve the consultation process and associated documents.

2.1 Background

In accordance with its licence obligations under Standard Condition C16, National Grid is required to carry out an annual review of the Balancing Principles Statement (BPS) and the Procurement Guidelines (PGs), and, if appropriate, to propose changes to these documents.

The main purpose of the annual consultation process is to keep PGs and BPS up to date by seeking industry views on any proposed changes. These changes only become effective if they are approved by the Authority.

2.2 Improving Readability of PGs and BPS

The PGs and BPS provide detailed information on the procurement and use of balancing services in order to balance demand and supply and to ensure the security and quality of electricity supply across the GB Transmission System. National Grid considers that the industry may find the PGs and BPS more helpful if they were written in simpler and easier-to-read form.

Therefore, National Grid has taken the opportunity to write the PGs and BPS in 'plain English'. This work has been carried out by an external organisation that specialises in converting technical documents into plain English.

Comment

National Grid is interested in the response to the use of the 'plain English' approach from the industry and, if well received, we will consider extending the approach to other documents.

The latter sections of this consultation document seek industry views on the 'plain English' approach.



3 Proposed Changes

This section summarises the changes proposed by National Grid to the Procurement Guidelines and the Balancing Principles Statement. Section 3.1 outlines 'In-house' technical changes and covers the type of changes which National Grid would normally propose as part of the annual review process. Section 3.2 outlines changes that further improve the readability of the PGs and the BPS by using 'plain English'; these changes have been suggested by an external organisation which specialises in writing plain English documents.

The changes proposed in section 3.2 have been superimposed on the changes proposed in section 3.1. For simplicity, section 3.2. only shows the marked-up changes for 'plain English'.

3.1 'In-house' Technical Changes

3.1.1 Procurement Guidelines

The 'in-house' technical changes proposed to the Procurement Guidelines (PGs) are summarised in Appendix A.

The majority of the proposed changes are house-keeping changes and points of clarification (e.g. insertion of the word "Electricity" before "Transmission Licence"). The remaining proposed changes reflect current practice and include:

- Procurement of Firm Frequency Response from demand side providers and small generators;
- Procurement of Enhanced Reactive and Frequency Response services via bilateral contracts (as well as via market tenders).

The changes proposed above are shown in a modified version of the PGs in Appendix C.

Consultation Question 1¹

Do you agree that the 'in-house' technical changes proposed to the PGs in Appendix C should be made?

¹ All consultation questions are summarised in Appendix G.



3.1.2 Balancing Principles Statement

The 'in-house' technical changes proposed to the Balancing Principles Statement (BPS) are summarised in Appendix B.

The majority of the proposed changes are house-keeping changes and points of clarification (e.g. insertion of the word "Electricity" before "Transmission Licence"). The remaining proposed changes fall in the following categories:

1. Removal of Duplication

The BPS duplicates provisions from the Procurement Guidelines and the Grid Code. This duplication includes:

- Description of Ancillary Services (Part B, section 4) and Pre-Gate closure BMU Transactions (Part C, section 10): These balancing services are described in the PGs which, in National Grid's opinion, is a more appropriate document to provide details of the type of services that National Grid procures.
- Definition of types of Frequency Response (Part D, section 3.1): The types of Frequency Response (i.e. Primary Response, Secondary Response and the High Frequency Response) are defined in the Grid Code. National Grid does not consider that these definitions need to be repeated in the BPS.

The proposed changes remove the above duplications.

2. Removal of Redundant Provisions

Part C, section 10 (last paragraph) refers to National Grid's reserve review. Following completion of the reserve review in 2005, this paragraph is redundant.

The proposed change is to remove this paragraph.

3. Consistency with Current Practice



Part D, section 2 (Constraint Management Process) refers to the calculation and optimisation of transmission constraints from 13 weeks ahead (as well as across other timescales from year ahead to Pre-Gate Closure control phase). This process is currently carried out from 9 weeks ahead.

The proposed change is to reflect the current practice and change the timescale from 13 weeks ahead to 9 weeks ahead.

Other proposed changes to reflect current practice include use of the “prevailing” (rather than “pre-NETA”) supply security standards.

4. Consistency with GB Security and Quality of Supply Standard (GBSQSS)

Part F of the BPS provides a summary of the GBSQSS in relation to the operation of the GB Transmission System. This Part has been updated to ensure consistency with the latest GBSQSS.

The latest version of the GBSQSS can be found on <http://www.nationalgrid.com/uk/Electricity/Codes/gbsqsscode/DocLibrary/>.

The changes proposed above are shown in a modified version of the BPS in Appendix D.

Consultation Question 2

Do you agree that the ‘in-house’ technical changes proposed to the BPS in Appendix D should be made?

3.2 ‘Plain English’ Changes

The ‘plain English’ changes proposed in this section have been suggested by an external organisation that specialise in converting technical documents into simpler and easier-to-read ‘plain English’ documents. As these changes focus on improving the readability, they are transparent throughout the PGs and BPS. Consequently, every specific proposed change is not tabulated (as has been the case for technical changes which have all been tabulated in Appendices A and B).



A key group of changes suggested by the external organisation that has not been incorporated is the terms defined in other legislative or governance documents such as National Grid's Electricity Transmission Licence and the Grid Code. The suggested changes that have not been incorporated include:

- Converting uppercase initials of defined terms into lowercase;
- Converting defined terms into simpler terms (e.g. replacement of 'mandatory services' with 'compulsory services');

The remaining suggested changes have been incorporated in the PGs and BPS.

3.2.1 Procurement Guidelines

The 'plain English' changes proposed to the PGs are shown in a modified version of the PGs in Appendix E. The baseline version of the PGs used for 'plain English' changes contains the technical changes; for clarity, only 'plain English' changes are shown in Appendix E.

Consultation Question 3

Do you agree that the 'plain English' changes proposed to the PGs in Appendix E (which include proposed 'in-house' technical changes) should be made?

3.2.2 Balancing Principles Statement

The 'plain English' changes proposed to the BPS are shown in a modified version of the BPS in Appendix F. The baseline version of the BPS used for 'plain English' changes contains the technical changes; for clarity, only 'plain English' changes are shown in Appendix F.

Consultation Question 4

Do you agree that the 'plain English' changes proposed to the BPS in Appendix F (which include proposed 'in-house' technical changes) should be made?

Consultation Question 5



Do you think that National Grid should extend the 'plain English' approach to other similar documents? If yes, which other documents would you like to see written in 'plain English'?

4 Proposed Implementation Date

Subject to Ofgem approval of the proposed changes by Monday 20 March 2009, it is National Grid's intention to implement the proposed changes on Wednesday 1 April 2009.

5 Consultation Responses

5.1 Summary of Consultation Questions

The consultation questions are summarised in Appendix G. The proforma in appendix G can be used to respond to the consultation questions, as described in section 5.2.

Appendix H contains a short questionnaire seeking industry feedback on this consultation document.

5.2 How to Respond

Responses should be submitted by replying to the consultation questions in Appendix G and e-mailing the completed proforma to balancingservices@uk.ngrid.com.

The completed feedback questionnaire can also be e-mailed to balancingservices@uk.ngrid.com.

If you do not wish any elements of your response to be made publicly available, please mark these as confidential.

5.3 Deadline for Responses



The consultation period for this consultation is 28 days from the date of publication (16 January 2009) of this document. Therefore responses are required **by 13 February 2009**.

5.4 Help with Queries

If you have queries regarding any aspect of this consultation, please contact:

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6 Next Steps

Following receipt of responses to this consultation, National Grid will prepare and submit a report (in accordance with Electricity Transmission Licence Standard Condition C16 paragraph 8) to the Authority. The consultation document, consultation report, and all responses, will be published on National Grid's website:

www.nationalgrid.com/uk/Electricity/Balancing/consultations/.

The current version of the PGs and BPS can be found at the following link:

www.nationalgrid.com/uk/Electricity/Balancing/transmissionlicensestatements/

7 Appendix A

Summary of Proposed 'In-house' Technical Changes to Procurement Guidelines

PG Section	Change	Comment
Preamble after Version Control, paragraph 1	Insert "National Grid's Electricity" before "Transmission Licence", and remove "the".	House-keeping change
Part A, section 1, paragraph 1	Insert "National Grid's Electricity" before "Transmission Licence", and remove "the".	House-keeping change
Part A, section 1, paragraph 3	Remove "when" before "actions" and insert "that" after "actions"	House-keeping change
Part A, section 1, paragraph 4	Insert "Electricity" before "Transmission Licence".	House-keeping change
Part A, section 1, paragraph 5	Insert "National Grid's Electricity" before "Transmission Licence", and remove "the".	House-keeping change
Part A, section 1, paragraph 6	Insert "," after "amended".	House-keeping change
Part A, section 1, paragraph 8	Insert "Electricity" before "Transmission Licence".	House-keeping change
Part C, section 2.1, bullet point 'Enhanced Reactive Power'	Insert "and in accordance with Schedule 3 of the CUSC" at the end of the paragraph.	Clarifies link to the CUSC ² provisions.
Part C, section 2.1, bullet point 'Short Term Operating Reserve'	Remove brackets around "or a combination of both".	House-keeping change
Part C, section 3, paragraph 3	Insert "Firm Frequency Response" at the end of the bullet list and remove "and" after "Fast Reserve".	Reflects current practice to procure Firm Frequency Response from 'Demand Side Providers and Small Generators'.
Part D, heading	Format heading "PART D: PROCUREMENT MECHANISMS"	House-keeping change.
Part D, Table 1, Commercial Ancillary Services,	Insert "or bilateral contracts".	Reflects current practice.

² The Connection and Use of System Code



PG Section	Change	Comment
Enhanced Reactive Services		
Part D, Table 1, Other Services, Frequency Response	Insert "or bilateral contracts".	Reflects current practice.



8 Appendix B

Summary of Proposed 'In-house' Technical Changes to Balancing Principles Statement

BPS Section	Change	Comment
Preamble after Version Control, paragraph 1	Insert "and" between "Balancing" and "Settlement Code".	House-keeping change
	Insert "and ensuring the security of the system at all times" at the end of the first sentence.	House-keeping change
	Insert "National Grid's Electricity" before "Transmission Licence", and delete "the", in the second sentence.	House-keeping change
	Replace "We will review" with "When reviewing", insert "we will" before "provide the Authority...", and delete "provide the Authority" before "with the relevant reports...";	House-keeping change
Preamble after Version Control, paragraph 3	Insert "Electricity" before "Transmission Licence".	House-keeping change
Part A, section 1, paragraph 1	Update the link to National Grid's website.	House-keeping change
	Delete "," in line one; Delete " (" in line two and insert "(NGET)".	House-keeping change
	Insert "efficient and economic" and delete "and/or to assist in doing so efficiently and economically".	House-keeping change
Part A, section 1, paragraph 3	Insert "also to define".	House-keeping change
	After "Part F summarises our operational security standards", replace "that define the requirements for" with "within which we will carry out";	House-keeping change
	At the end of the paragraph, insert "Part G explains exceptions to the Balancing Principles Statement, where circumstances may arise"	House-keeping change



BPS Section	Change	Comment
	which require us to operate outside the principles detailed in previous sections”.	
Part A, section 1, paragraph 4	After “...has been developed”, insert “by NGET,”.	House-keeping change
	Insert “Electricity” before “Transmission Licence” (two instances).	House-keeping change
Part A, section 1, paragraph 7	Insert “Electricity” before “Transmission Licence”.	House-keeping change
Part A, section 1, paragraph 8	Replace “National Grid Electricity Transmission plc” with “NGET”;	House-keeping change
	Update the link to National Grid’s website.	House-keeping change
Part B, section 1, paragraph 1	Insert “Electricity” before “Transmission Licence”.	House-keeping change
Part B, section 1, paragraph 2	Replace “National Grid Electricity Transmission plc” with “NGET”.	House-keeping change
	In item (ii), Remove “in addition”, and insert “Electricity” before “Transmission Licence”.	House-keeping change
Part B, section 3, paragraph 1	Insert “)” after “participants”.	House-keeping change
	Delete ““NGC Demand”” and insert “GB National Demand and GB Transmission System Demand.	Consistency with Grid Code defined terms.
	Replace “F” with “f” after BC1.4.2.	Clearer reference to a Grid Code paragraph.
Part B, section 4, paragraph 1	Delete the paragraph “The Transmission Licence defines Balancing Services...” and insert “The Balancing Services are defined in Standard Condition C1 of National Grid’s Electricity Transmission Licence. A detailed explanation of these Balancing Services is provided in the Procurement Guidelines.”.	Ancillary Services are described in detail in the Procurement Guidelines which also outline the definition of Balancing Services from the Electricity Transmission Licence. This duplication has been removed from the Balancing Principles Statement.
Part B, section 5, paragraph 1	Before “Transmission System”, replace “our” with “the GB”;	House-keeping change
Part B, section 5, paragraphs after subsection (g) – Communication Failure	Delete paragraphs after item (g), and insert these paragraphs after paragraph 1 of section 5 under the heading ‘General Principles for Issuing Emergency Instructions’;	The general principles for issuing Emergency Instructions are outlined at the beginning, rather than at the end, of the section.



BPS Section	Change	Comment
	<p>Under these General Principles:</p> <ol style="list-style-type: none"> In item (c), insert a fourth bullet point including the text “Dynamic Parameters - BMUs with more appropriate dynamic parameters being selected in preference to those with less appropriate parameters”; In the last paragraph beginning with ‘In the case of a BMU...’, replace “and a valid and relevant bid or offer has been submitted, then we shall log a Bid-Offer Acceptance” with “details will be posted on the BMRS and the Emergency Instruction Acceptance Data will be agreed post event”. 	Other proposed changes in this section reflect current practice.
Part B, section 5, subsection (a) - Events	Before Transmission System, replace “our” with “the GB”.	House-keeping change
	Replace “lead” with “leads”.	Grammar correction.
Part B, section 5, subsection (b) – Demand Control	Before Transmission System, replace “our” with “the GB”.	House-keeping change
Part B, section 5, subsection (c) – System and Localised Negative Reserve Active Power Margin	In paragraph 1, replace “Gensets” with “BMUs” (two instances).	House-keeping change
	Under ‘System Negative Reserve Active Power Margin’, replace “Gensets” with “BMUs”.	House-keeping change
	<p>Under ‘Localised Negative Reserve Active Power Margin’:</p> <ol style="list-style-type: none"> Delete “In the case of Localised NRAPM” and replace “We” with “we”; Replace “Gensets” with “BMUs” (three instances); <p>Delete text associated with the last four bullet points and replace it with “in accordance with the General Principles outlined above”.</p>	House-keeping change
Part B, section 5, subsection (g) –	Replace “National Grid Electricity Transmission plc” with “NGET”.	House-keeping change



BPS Section	Change	Comment
Communication Failure		
Part B, section 6	Replace "Offers" with "Bid-Offers".	'Bids' inserted to clarify involuntary reduction in generation.
Part C, section 5, item (iv)	Replace "National Grid Electricity Transmission plc" with "NGET".	House-keeping change
Part C, section 6, last paragraph	Replace "National Grid Electricity Transmission plc" with "NGET".	House-keeping change
Part C, section 8	Replace "National Grid Electricity Transmission plc" with "NGET" (4 instances).	House-keeping change
	In paragraph 4, replace "Transaction Point" with "Control Point".	Correct use of terminology.
Part C, section 10	Delete the first three paragraphs.	Pre-Gate Closure BMU Transaction described here is a Balancing Service which is also described in the PGs. Duplication in the BPS has therefore been removed.
	In the fourth and fifth paragraphs, insert "system" before "requirements".	House-keeping change
	Delete the last paragraph referring to the review of reserve procurement process.	Following National Grid's review of the reserve arrangements in 2005, this paragraph is out of date and has been removed.
Part D, section 2, paragraph 1	Replace "13 weeks ahead" with "9 weeks ahead".	Reflects current practice.
Part D, section 2.1	Replace "National Grid Electricity Transmission plc" with "NGET" (4 instances).	House-keeping change
Part D, section 2.2	In the section heading, replace "13 weeks ahead" with "9 weeks ahead".	Reflects current practice.
Part D, section 2.3	Replace "Paragraph 9" with "Paragraph 10".	Reference correction.
Part D, section 3, paragraph 1	Delete "and" before "demand forecast error", and insert "and credible generation or demand loss" after "demand forecast error".	Reflects current practice.
	Delete "pre-NETA" and insert "the	Reflects current practice.



BPS Section	Change	Comment
	prevailing”.	
Part D, section 3, paragraph 2	Delete “pre-NETA” and insert “the prevailing”.	Reflects current practice.
	Replace “these” with “our”.	House-keeping change
	After “policies may develop”, insert “and change”.	Clarifies potential policy changes as a result of unforeseen market circumstances.
	Insert “operational” before “experience”.	House-keeping change
Part D, section 3.1, paragraph 1	After “There are three categories of response”, insert “(Primary Response, Secondary Response and High Frequency Response)”.	House-keeping change of the three categories of response.
	Replace text associated with the description of each category of response with “defined in the Grid Code”.	The three types of response defined in the Grid Code are duplicated here. This duplication is removed.
Part D, section 3.1, paragraph 2	Replace “Generally speaking” with “In general”.	House-keeping change
Part D, section 3.2, subsection (c) – Short Term Operating Reserve	Insert “Electricity” before “Transmission Licence” in paragraph 1.	House-keeping change
	Replace “timescales” with “timescales”.	Typographical error.
Part E, section 1, Step 6	Replace “3” with “ \sum ”.	Typographical error.
Part E, section 1, Step 7	Replace “3” with “ \sum ” (two instances).	Typographical error.
Part E, section 2, Step 6	In item (vii), replace “National Grid Electricity Transmission plc” with “NGET”.	House-keeping change
Part F, section 1	Replace current section 1 (Overview) with a new section 1.	Reflects prevailing text in the GB Security and Quality of Supply Standard.
Part F, section 2	Replace current section 2 (Overview) with a new section 2.	Reflects prevailing text in the GB Security and Quality of Supply Standard.
Part F, section 3, heading	Delete “standard”.	Consistency within Part F.
Part F, section 3, final paragraph	Insert “a voltage fall of” and delete “+/-”.	Reflects current practice.



9 Appendix C
Marked-up Procurement Guidelines for
Proposed 'In-house' Technical Changes

Please see a separate document



10 Appendix D
Marked-up Balancing Principles Statement
for Proposed 'In-house' Technical Changes

Please see a separate document



11 Appendix E

Marked-up Procurement Guidelines for Proposed 'Plain English' Changes

Please see a separate document



12 Appendix F

Marked-up Balancing Principles Statement for Proposed 'Plain English' Changes

Please see a separate document

13 Appendix G

Consultation Questions

National Grid invites responses to this consultation by 13 February 2009. The responses to specific consultation questions (summarised below) or any other aspect of this consultation can be provided by completing the following proforma.

Please return the completed proforma to balancingservices@uk.ngrid.com.

Respondent:	
Company Name:	
Does this response contain confidential information?	

No	Question	Response (Y/N)	Rationale
1	<i>Do you agree that the 'in-house' technical changes proposed to the PGs in Appendix C should be made (section 3.1.1)?</i>		
2	<i>Do you agree that the 'in-house' technical changes proposed to the BPS in Appendix D should be made (section 3.1.2)?</i>		
3	<i>Do you agree that the 'plain English' changes proposed to the PGs in Appendix E (which include proposed 'in-house' technical changes) should be made (section 3.2.1)?</i>		
4	<i>Do you agree that the 'plain English' changes proposed to the BPS in Appendix F (which include proposed 'in-house' technical changes) should be made (section</i>		



No	Question	Response (Y/N)	Rationale
	3.2.2)?		
5	<i>Do you think that National Grid should extend the 'plain English' approach to other similar documents? If yes, which other documents would you like to see written in 'plain English' (section 3.2.2)?</i>		
6	<i>Do you have any other comments?</i>		



14 Appendix H Feedback

National Grid would welcome any feedback on this consultation document or any other aspect of the consultation process.

Please complete the form by ticking the appropriate boxes and providing additional comments where appropriate. Please return the completed form to balancingservices@uk.ngrid.com.

Respondent:	
Company Name:	
Does this feedback contain confidential information?	

		(1) very poor (2) poor (3) average (4) good (5) very good (6) excellent					
		1	2	3	4	5	6
(a)	How would you rate the consultation document overall?						
(b)	How well was the document structured?						
(c)	How clear were the contents of the document?						
(d)	How appropriate were the consultation questions?						

Which parts of the document did you find most useful?

Which parts of the document did you find least useful?

Please provide any additional comments that may assist future consultations.