

## Appendix B - Response Proforma

National Grid invites responses to this consultation by **8<sup>th</sup> March 2018**. The responses to the specific consultation questions (below) or any other aspect of this consultation can be provided by completing the following proforma.

Please return the completed proforma to [balancingservices@nationalgrid.com](mailto:balancingservices@nationalgrid.com)

<b>Respondent:</b>	Colin Prestwich
<b>Company Name:</b>	SmartestEnergy
<b>Does this response contain confidential information? If yes, please specify.</b>	No

No	Question	Response (Y/N)	Rationale
1	Do you agree that the changes proposed to the ABSVD, shown in Table 1 have been implemented correctly to the ABSVD methodology in Appendix A? If not, please provide rationale.	No comment	

No	Question	Response (Y/N)	Rationale
2	Do you agree that the changes proposed to the ABSVD, shown in Table 1 and in Appendix A, should be made? If not, please provide rationale.	No	<p>This is all wrong.</p> <p>Article 49 of the European Guideline for Balancing requires TSOs to “calculate an imbalance adjustment to be applied to the concerned balance responsible parties for each ABSVD informal activated balancing energy bid”. NGT seem to have decided that “effectively this means that in GB the SO will need to ensure that imbalance is correctly attributed when Balancing Services are delivered. In the case of non-BM Balancing Services providers, this means that delivered balancing energy is neutralised against the relevant Supplier’s account.” We do not agree that this necessarily means that volumes need to be changed in the Supplier’s account. The adjustment could be financial.</p> <p>Suppliers’ processes assume that the energy which passes through the meter is that on which they are settled. This is a fundamental feature of the BSC.</p> <p>In our view, a better solution would be to adjust the payments to embedded generators in the NGT sphere i.e. a secondary correcting cash transfer at SSP could be made where the BMU does not have its position corrected through ABSVD. If non-BM Units and their aggregators know that they will have to pay a secondary cashflow they will adjust their bids for STOR accordingly.</p>
3	Do you have any other comments in relation to the changes proposed to the ABSVD?	No	