EBR Article 18 Proposal – Response Release 3 Pro-Forma

NGESO invites responses to the Response R3 consultation titled: **EBR Article 18 Mapping: Response Release 3**. The proposal outlines updates to the terms for the Dynamic Response Services: Dynamic Containment (DC), Dynamic Moderation (DM) and Dynamic Regulation (DR).

## Instructions

Please provide responses to the specific consultation questions (below) or any other aspect of this consultation via the MS Forms link provided below by **09:00 on 29 July 2024.** Please note that responses submitted after this time may not be counted. A Word version is included to allow internal working/drafting as we understand this may facilitate editing and shared drafting. Completed answers should be copied into the MS Forms link by the respondent for submission.

* [Link to submission form](https://forms.office.com/r/d1fVq94JWr)

Should you have any issue with the proposed submission process, please contact the Market Change Delivery team via box.futureofbalancingservices@nationalgrideso.com to make alternative arrangements.

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| --- | --- | --- |
| 1 | Company Name |  |
| 2 | Respondent name and contact details |  |
| 3 | |  | | --- | | **Does this response contain confidential information? If yes, please specify.** | |  |

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|  | Release 3 – frequency response reform | | |
| No. | Topic | Question | Answer |
| 4 | Removal of Maximum Ramp Rate | Do you agree with the proposal to remove the Maximum Ramp Rate? If not, please explain your rationale. |  |
| 5 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 6 | Availability Description | Do you agree that the proposed changes to the Service Terms clarifies the policy around availability? If not, what needs to be clarified further? |  |
| 7 | SoE management rule – During service delivery | Do you agree that the proposed changes to the service terms accurately convey the intent around state of energy during service delivery? If not, what needs to be clarified further? |  |
| 8 | SoE management rule – Submitting sell orders | Do you agree with the proposed percentages of capacity that we require providers to reserve when submitting sell orders? If not, please provide values that you would deem more appropriate with evidence as to why. |  |
| 9 | Requiring operational metering and operational baselines at all times | Do you agree with this proposal to require operational metering and operational baselines outside contracted service periods? If not, please explain your rationale. |  |
| 10 | Are there any implementation challenges we should be aware of, eg, in cost or time to build capability? If so, please explain and provide evidence. |  |
| 11 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 12 | Penalty reform and unit suspension | Do you agree with the proposal to introduce a tiered penalty regime? If not, please explain your rationale. |  |
| 13 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 14 | Disarming and re-arming instructions outside contracted service periods | Do you agree with this proposal to send disarming and re-arming signals outside contracted service periods? If not, please explain your rationale. |  |
| 15 | Are there any implementation challenges we should be aware of, e.g. in cost or time to build capability to receive signals outside contracted service? If so, please explain and provide evidence. |  |
| 16 | Maximum Sell size | Do you agree with the proposal to increase the maximum sell size to 100MW across all of the dynamic services? If not, please explain your rationale. |  |
| 17 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 18 | Deadband for non-energy limited assets | Do you agree with this proposal to provide a zero deadband for non-energy limited assets? If not, please explain your rationale. |  |
| 19 | Do you agree it delivers the policy intent to enable non-energy limited assets to participate in our services? |  |
| 20 | Do you have any other comments or questions on the proposal and proposed wording? |  |
| 21 | Transfer: pay secondary provider | Do you agree with this proposal to transfer availability payments to secondary service providers in the instance of a transfer? If not, please explain your rationale. |  |
| 22 | Updates to schedule 3 | Do you agree with the proposed changes to the settlements formula? If not, please explain your rationale. |  |
| 23 | Do you agree with the proposed changes to the metered response formulas? If not, please explain your rationale. |  |
| 24 | Do you agree with the proposed changes to the grace periods when switching from unavailable to available in bundled services? If not, please explain your rationale. |  |
| 25 | Other housekeeping changes | Do you have any comments or questions on any of the housekeeping changes? |  |