

P392 'Amending the BSC change process to incorporate the delegation of NGENSO's powers and obligations under the EBGL to change EBGL Article 18 terms and conditions.'

P392 seeks to ensure the process and responsibilities for amending Balancing and Settlement Code (BSC) provisions constituting Electricity Balancing Guideline (EBGL) Article 18 terms and conditions reflect delegations made by National Grid Electricity System Operator (NGESO) to the Balancing and Settlement Code Company (BSCCo) and the BSC Panel, to ensure a unified market change process.

These changes are necessary to ensure the EBGL change process is followed as part of the existing BSC Change process, for all future BSC Modifications that impact the EBGL Article 18 terms and conditions found in the BSC. These changes are mainly administrative.



ELEXON recommends P392 is progressed to the Assessment Phase for an assessment by a Workgroup

This Modification is expected to impact:

- ELEXON as the BSCCo
- NGENSO
- BSC Parties engaging in the BSC Modifications process
- Interested third parties engaging in the BSC Modifications process

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About This Document

This document is an Initial Written Assessment (IWA), which ELEXON will present to the BSC Panel on 10 October 2019. The Panel will consider the recommendations and agree how to progress P392.

There are two parts to this document:

- This is the main document. It provides details of the Modification Proposal, an assessment of the potential impacts and a recommendation of how the Modification should progress, including the Workgroup's proposed membership and Terms of Reference.
- Attachment A contains the P392 Proposal Form.



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1 Summary

Issue

National Grid Electricity System Operator (NGESO) is delegating some of its powers and obligations under European Electricity Balancing Guideline (EBGL) Articles 4, 6 and 10 to the Balancing and Settlement Code Company (BSCCo) and the BSC Panel. The BSC therefore needs to be amended to reflect the BSCCo's and BSC Panel's increased powers and obligations under the delegation to facilitate the EBGL change process within existing BSC change processes.

Solution

P392 proposes to update the relevant BSC processes to capture the specific powers and obligations delegated to the BSCCo or the BSC Panel (as relevant) from NGESO, and clearly set out the change process that shall apply to any BSC Modification proposal seeking to amend any of the EBGL Article 18 terms and conditions.

Impacts

The BSC, its processes, and ELEXON and NGESO are impacted by this change. BSC Parties raising Modifications that impact EBGL Article 18 terms and conditions will also be impacted as their Modifications will have to be submitted for a month long consultation. Interested third parties engaging in the BSC Modifications process may be impacted by this change.

Implementation

The Proposer recommends that P392 is implemented at the earliest opportunity following approval by the Authority. The Proposer suggests this should be on or before **4 April 2020**.

Recommendation

The Panel are invited to agree that P392 is submitted to the Assessment Procedure for assessment by a Workgroup.



European Balancing Guidelines (EBGL)

The EBGL is about creating a market where countries can share the resources used by their Transmission System Operators to make generation equal demand. It also allows new players such as demand response and renewables to take part in this market. The EBGL should help increase security of supply, limit emissions and diminish costs to customers.

Background

The legally-binding [European Electricity Balancing Guideline \(EBGL\)](#) came into force on 18 December 2017. The EBGL was published as Commission (EU) Regulation 2017/2195, establishing a guideline on electricity balancing. The EBGL is one of eight European Network Codes (ENCs) and Guidelines. EBGL is the main ENC impacting the BSC, as much of its scope covers Balancing. The European Network of Transmission System Operators (ENTSO-E), was responsible for developing the ENCs.

Relevant EB GL Provisions for P392

Article 18 terms and conditions

Article 18 of EBGL describes at a high level what the balancing and imbalance terms and conditions must cover for each Member State of the European Union.

Article 4 'Terms and conditions or methodologies of TSOs'

Article 4 of the EBGL sets obligations on the Transmission System Operators (TSOs) of each Member State to develop the proposals and methodologies related to balancing for Balancing Service Providers (BSPs) and Balancing Responsible Parties (BRPs) and submit them for approval to the National Regulation Authority. In the case of Great Britain (GB) the NETSO is the TSO and the Authority (Ofgem) is the relevant Authority.

Article 5 'Approval of terms and conditions or methodologies of TSOs'

Article 5 requires the Authority to approve the terms and conditions or methodologies developed by TSOs in accordance with Article 37 of Directive 2009/72/EC.

Article 6 'Amendments to terms and conditions or methodologies of TSOs'

Article 6 gives powers to the Authority to amend the proposed terms and conditions, where it believes this is needed to allow it to approve the terms and conditions. If this is required, NGENSO as GB's TSO would be required to submit a proposal for amended terms and conditions for approval within two months of the direction from the Authority. The Authority would then have two months following the submission of the amended proposal to make its determination.

Article 6 also states that TSOs and the Authority may develop proposals for amendments to the EBGL Article 18 terms and conditions, in which case the proposals for amendments shall be subject to consultation in accordance with Article 10 and approved in accordance with Articles 4 and 5.

Article 10 'Public Consultation'

Article 10 states a consultation period for draft proposals should last no less than one month (or not less than two months if they relate to specified matters). The TSO will also have to provide justification for including/ not including views resulting from the consultation.

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Article 10 also requires the TSO to 'duly consider the views of stakeholders resulting from the consultations' prior to submitting the proposal for regulatory approval. Further, 'in all cases, a sound justification for including or not including the views resulting from the consultation shall be provided together with the submission and published in a timely manner before or simultaneously with the publication of the proposal for terms and conditions or methodologies.'

Article 13 'Delegation and assignment of tasks'

Article 13 allows the TSO to delegate all or part of any tasks with which it is entrusted under the EBGL to one or more third parties. This is subject to the third party being able to carry out the respective function at least as effectively as the delegating TSO, and can demonstrate its ability to meet the tasks to be delegated.

Where the TSO delegates any tasks to a third party, it is required to ensure that suitable confidentiality agreements in accordance with the confidentiality obligations of the delegating TSO have been put in place prior to the delegation. After the tasks have been delegated, and the TSO is required to inform the Authority and publish the decision publically.

NGESO Proposal for EBGL Article 18 terms and conditions

In accordance with EBGL Article 18, the TSO(s) of a member state are required to propose terms and conditions relating to balancing.

After a consultation process NGESO submitted a [First Proposal for EBGL Article 18](#) on 18 June 2018. Ofgem then published a [First Request for Amendment](#) to this proposal on 4 February 2019.

In response NGESO carried out a second consultation exercise and then issued a [Second Proposal for EBGL Article 18](#) on 4 April 2019.

The second proposal included the following changes:

- The mapping between the paragraphs of Article 18 and GB terms and conditions was reviewed to remove any references that did not place specific obligations on BRPs or BSPs.
- In the same mapping extra detail was included for some obligations
- A summary of changes to the Grid Code procedures so that they align with EBGL was included
- A proposal was presented showing how Ofgem could approve the relevant sections of Standard Contract Terms
- A plan with implementation timescales was provided

Ofgem considered the second proposal, and on the 4 June 2019 published a [Second Request for Amendment](#).

In the second request Ofgem highlighted the need to include Frequency Containment Reserve services in the mapping and also to add extra clarity as to how NGESO will implement Article 34 of EBGL (transfer of balancing capacity).

The latest expected date for the Authority's decision on the most recent amended proposal is 4 October 2019.

What is in the NGESO Proposal?

NGESO proposed that the terms and conditions related to balancing as described under Article 18 currently exist in provisions contained within the BSC, Grid Code, Connection and Use of System Code (CUSC), Standard Contract Terms and Statements and Methodologies under Standard Condition C16 of the Transmission Licence.

Within the Article 18 proposal, the NGESO provided mapping to the relevant provisions in the above documents that, according to the NGESO, constitute the terms and conditions related to balancing for GB.

Who will operate the EBGL Amendment process?

Unless delegated or assigned, all obligations regarding the operation and approval of the EBGL Amendment process lie with the TSO and the National Regulatory Authority (NRA) (NGESO and Ofgem in GB).

Summary Timeline for EBGL Article 18 Proposal		
Who	What	When
NGESO	Submitted First Proposal for EBGL Article 18	18 June 2018
Ofgem	Published a First Request for Amendment to the proposal	4 February 2019
NGESO	Submitted a Second Proposal for EBGL Article 18	4 April 2019
Ofgem	Published a Second Request for Amendment to the proposal	4 June 2019
NGESO	Submitted a Third Request for Amendment to the proposal	4 August 2019
Ofgem	Decision on third Request for Amendment	Expected by 4 October 2019

What is the issue?

Although some of the EBGL Article 18 terms and conditions are constituted of BSC provisions, the BSC itself is not referred to in the EBGL. As such, the change process applicable to BSC Modifications does not by itself comply with the change process required for the amendment of the EBGL Article 18 terms and conditions under Article 6 of the EBGL. More specifically, the power to amend (and in the case of Ofgem, amend and approve) EBGL Article 18 terms and conditions sits only with the Electricity System Operator (ESO) or Ofgem under the EBGL.

For BSC Modifications that directly impact EBGL Article 18 terms and conditions held in the BSC, this means two processes will have to be run in parallel, the aforementioned NGESO process, and the BSC Change process. This will be inefficient for all BSC Parties, ELEXON, NGESO, Ofgem and makes the process unclear for industry, if a change is not made to align the processes, which this Modification seeks to achieve.

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Further, there is no provision for a one month consultation process to be conducted prior to submission of the change to Ofgem for decision in the BSC, which is expressly required under Article 10 of the EBGL. Similarly, the BSC doesn't explicitly require feedback be provided, or justification published in respect of the consultation process, which is specifically required under EBGL Article 10.

The BSC also does not provide for a process whereby a draft proposal, seeking amendments to the EBGL Article 18 terms and conditions has been raised, and therefore needs to follow the EBGL defined change process. It also doesn't capture a process whereby Ofgem sends back an EBGL proposal for change for further amendment.

NGESO is in the process of delegating certain tasks related to the amendment process under Articles 4, 6 and 10 as applicable to EBGL Article 18 terms and conditions. Administrative tasks will be delegated to ELEXON as the BSCCo and decision-making tasks are to be delegated to the BSC Panel under EBGL Article 13. The BSC therefore needs to be amended to reflect the BSCCo's and BSC Panel's revised obligations under the delegation to facilitate the EBGL change process within existing BSC change processes.

This Modification will allow ELEXON to incorporate the delegated obligations and ensure that the change process as it will apply to any BSC Modifications seeking to amend the EBGL Article 18 terms and conditions, is compliant with the EBGL requirements.

Delegations

The Article 18 terms and conditions (for BSPs and BRPs) is currently proposed to be implemented by NGESO for April 4 2020.

National Grid ESO is delegating the following tasks to ELEXON as the BSCCo:

1. The duty under EBGL Article 10(1) to conduct a one month consultation on any Article 18 Modification proposal, along with the obligation to collate the consultation responses.
2. The duty under Art 10(6) to publish the justifications for including or not including the views resulting from the consultation.
3. The duty to submit the "proposal" to the Authority for approval.

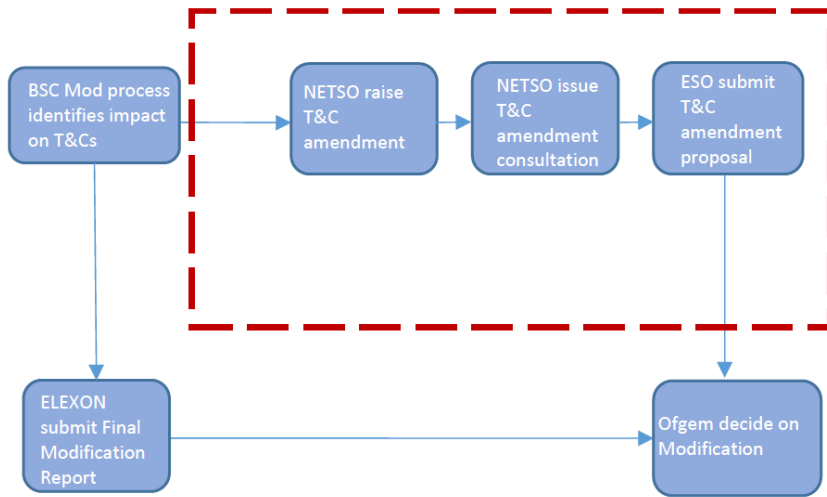
National Grid ESO is delegating the following tasks to the BSC Panel:

1. the review of consultation responses and the decision whether to make changes, and if so to what extent, to the Article 18 Modification proposal under Article 10(6) of the EBGL
2. the decision to submit the Article 18 Modification proposal to the Authority for decision under Article 4 of the EBGL

Impact on BSC Change Process

Arrangements will need to be implemented in order that an aligned and efficient market change process can run, ensuring Modifications are progressed through such process in compliance with EBGL requirements.

The diagram below outlines the two distinct legal processes to change the BSC, following Authority approval of BSC provisions that will constitute Article 18 terms and conditions related to balancing.



The Article 6(3) EBGL Amendment process is legally separate amendment procedure from the one applicable to BSC amendments. This is because, any BSC Modification seeking to change the BSC sections constituting EBGL Article 18 terms and conditions will be rendered ineffective unless a corresponding change is raised under the EBGL process, in compliance with EBGL Article 6, and approved by the Authority in accordance with EBGL Article 5.

P392 will create efficiencies, by ensuring the separate legal BSC change and EBGL change processes can be progressed by a single Code Manager body, to ensure market participants do not have to engage through two separate processes.

Key changes to BSC Section F

BSC Section F 2.7.4(d) notes the Report Phase Consultation period (whereby the BSCCo consults on the Panel’s initial recommendations) shall be for a period no longer than 15 business days. This enables Modifications to be presented to the following month’s Panel meeting, and subsequently submitted to the Authority within 7 Business Days of the Panel’s final decision, as required under F 2.7.6.

However, Article 10 states that a consultation period for EBGL draft proposals shall last not less than one month. Therefore, the BSC will need to be amended to accommodate this longer EBGL consultation period as part of the Report Phase, where BSC Modifications impact BSC provisions that constitute Article 18 terms and conditions. Whilst this could elongate the progression timescales of BSC Modifications that seek to amend BSC text that constitutes Article 18 terms and conditions related to balancing, it’s essential the aligned, efficient process is compliant with both the BSC and EBGL change processes. It’s important to note that aligning the EBGL and BSC change processes is more efficient, and clearer for market participants, than if the process is run by two separate Code Manager entities.

Proposed solution

This Modification seeks to update the relevant BSC processes to capture the specific powers and obligations delegated to the BSCCo and the BSC Panel from NGESO. It will outline the change process that shall apply to any BSC Modification proposal seeking to amend (wholly or partially) the BSC legal text that constitutes the EBGL Article 18 terms and conditions.

We need to make this change to ensure the correct procedure is followed once the delegations from the ESO to the BSCCo and BSC Panel become effective, satisfying the requirements in EBGL. Further, this change shall ensure a clear and efficient process for all market participants, and Ofgem, when amending BSC text that constitutes EBGL Article 18 terms and conditions.

This includes:

- incorporating provisions in the BSC which will require NGESO to act upon/give effect to the recommendations of the BSCCo/Panel, in designating a BSC Modification proposal as a "draft proposal" for the purposes of Article 10(1) of the EBGL ("Article 18 Modification proposal");
- A one month industry consultation on the "draft proposal" under Article 10 of the EBGL at the same time as the BSC Modification Report Phase Consultation, prior to submission of the proposal to the Authority for approval under Article 4 ;
- The publication of the justifications for including or not including the views resulting from the consultation under Article 10(6) of the EBGL;
- the submission of the Art 18 proposal to the Authority for decision under Article 4; and.
- A process to ensure that any send back by the Authority goes back through the whole EBGL amendment process.

ELEXON and the BSC Panel are best placed to carry out these activities using the current BSC Modification process, amended to include the change process for Article 18 terms and conditions as stipulated under the EBGL.

Applicable BSC Objectives

The Proposer suggests that this Modification Proposal will better facilitate Applicable BSC Objectives (a), (d), and (e), as detailed below, noting the Workgroup will consider the P392 solution against the Applicable BSC Objectives as part of the Assessment Procedure.

The Proposer suggests this proposal positively impacts Applicable BSC Objectives (a), (d) and (e).

Applicable BSC Objective (a)

P392 positively impacts Applicable BSC Objective (a) as the solution ensures the effective discharge of Transmission Company (Electricity System Operator) obligations through delegations.

Applicable BSC Objective (d)

P392 positively impacts applicable Objective (d), as it ensures the BSC Change process satisfies the requirements under EBGL Articles 6 and 10.

Whilst the EBGL Article 18 change process does not improve the efficiency of the current BSC change framework itself, implementing an aligned process whereby both BSC Change and Article 18 change processes are progressed together, is the most efficient way of progressing BSC Modifications that impact Article 18 terms and conditions. Without this aligned process, the segregation of responsibilities could lead to further delays in reaching Authority decision on BSC Modifications that impact Article 18 terms and conditions.

By delegating NGESO responsibilities to ELEXON as the BSCCo and the BSC Panel, industry parties will have clarity on the process for BSC changes that impact Article 18 terms and conditions.

Applicable BSC Objective (e)

P392 positively impacts Applicable BSC Objective (e) as it will ensure BSC Modifications that impact Article 18 terms and conditions can be progressed in compliance with EBGL change provisions, once the delegations from the ESO to BSCCo and BSC Panel become effective.

Implementation approach

The Proposer suggests that P392 be implemented at the earliest opportunity, following approval by the Authority, in order the efficiencies of an aligned process can be realised at the earliest opportunity. The Proposer suggests this should be on or before **4 April 2020**, which is the current date the NGESO provided to the Authority in its proposed implementation timescale in respect of EBGL Article 18 terms and conditions, in order there is clarity regarding the change process when the BSC provisions become active in constituting EBGL Article 18 terms and conditions.



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

(g) Compliance with the Transmission Losses Principle

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4 Areas to Consider

In this section we highlight areas which we believe the Panel should consider when making its decision on how to progress P392, and which a Workgroup should consider as part of its assessment of P392. We recommend that the areas below form the basis of a Workgroup's Terms of Reference. At its meeting on 10 October 2019, the Panel may determine further areas for the P392 Workgroup to consider.

Areas to consider

The table below summarises the areas we believe a Modification Workgroup should consider as part of its assessment of P392:

Areas to Consider
How will P392 impact BSC Settlement Risks?
What changes are needed to BSC documents, systems and processes to support P392 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
Are there any Alternative Modifications?
Should P392 be progressed as a Self-Governance Modification?
Does P392 better facilitate the Applicable BSC Objectives than the current baseline?
Should the amended BSC Modification process be applicable for all BSC Modifications, or only those that wholly or partly amend the BSC provisions that constitute EBGL Article 18 terms and conditions?

5 Proposed Progression

Next steps

P392 should be assessed by a Workgroup and submitted to the Assessment Procedure, given it seeks to amend the governance procedures for BSC Modifications that wholly or partly seek to amend BSC provisions constituting EBGL terms and conditions.

Self-Governance

Both the Proposer and ELEXON agree that P392 should not be treated as a Self-Governance Modification as it will have a material effect on Self-Governance criteria (v) the Code's governance procedures or Modification procedures.

Workgroup membership

We recommend that the Workgroup assessing this Modification Proposal has expertise in the following areas in order the Modification be fully assessed:

- Understanding of EBGL, specifically requirements in Articles 18, 10 and 6; and
- The existing BSC Modifications process.

ELEXON will provide training for Workgroup members who request it.

Timetable

Proposed Progression Timetable for P392	
Event	Date
Present Initial Written Assessment to Panel	10 October 2019
Workgroup Meeting	W/C 4 Nov 2019 or W/C 18 Nov 19
Workgroup Meeting	W/C 9 December 2019
Assessment Procedure Consultation	06 Jan 2020 – 24 Jan 2020
Workgroup Meeting	W/C 27 Jan 2020
Present Assessment Report to Panel	13 Feb 2020
Report Phase Consultation	17 Feb 2020 – 28 Feb 2020
Present Draft Modification Report to Panel	12 Mar 2020
Issue Final Modification Report to Authority	W/C 16 Mar 2020



What are the Self-Governance Criteria?

A Modification that, if implemented:

- (a) is unlikely to have a material effect on:
- (i) existing or future electricity consumers; and
 - (ii) competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
 - (iii) the operation of the national electricity transmission system; and
 - (iv) matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - (v) the Code's governance procedures or modification procedures; and
- (b) is unlikely to discriminate between different classes of Parties.

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6 Likely Impacts

Impact on BSC Parties and Party Agents

Party/Party Agent	Potential Impact
BSC Parties/Party Agents/interested third parties engaging in the BSC Modifications process	BSC Parties, Party Agents and interested third parties may be indirectly impacted by the solution to this Modification Proposal due to the amended Modification process whereby Modifications impact BSC text that constitutes EBGL terms and conditions.

Impact on the National Electricity Transmission System Operator (NETSO)

The NETSO will be impacted by P392 as it will have an amended role to play in the BSC Modifications process, where BSC Modifications impact BSC text that constitutes EBGL Article 18 terms and conditions. The scale of the impact will depend on the solution devised by the Workgroup through the Assessment Procedure.

Impact on BSCCo

Area of ELEXON	Potential Impact
The BSC Modification process	Changes will be required to local working procedures and guidance notes to ensure the process devised under tis P392 is implemented within the operational BSC Change process.

Impact on BSC Settlement Risks

Initially, we do not anticipate there to be any impact on BSC Settlement Risks. However, any impact on Settlement Risks will be considered during the Assessment Procedure.

Impact on BSC Systems and processes

BSC System/Process	Potential Impact
No impacts on BSC Central Systems are anticipated, which will be confirmed through the Assessment Procedure.	

Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Potential Impact
No impacts anticipated.	

Impact on Code

Code Section	Potential Impact
BSC Section F 'Modification Procedures'	BSC Section F will be amended to implement the solution to P392.

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Impact on Code Subsidiary Documents	
CSD	Potential Impact
Balancing and Settlement Code Procedure (BSCP) 40 'Change Management'	BSCP40 may be amended to implement the solution to P392.

Impact on other Configurable Items	
Configurable Item	Potential Impact
No impacts anticipated.	

Impact on Core Industry Documents and other documents	
Document	Potential Impact
Ancillary Services Agreements	None (to note, NGENSO will separately be progressing changes to the Grid Code and CUSC in order to comply with the requirements of the EBGL. However, P392 itself will not directly impact on these documents)
Connection and Use of System Code	
Data Transfer Services Agreement	
Distribution Code	
Distribution Connection and Use of System Agreement	
Grid Code	
Master Registration Agreement	
Supplemental Agreements	
System Operator-Transmission Owner Code	
Transmission Licence	
Use of Interconnector Agreement	

Impact on a Significant Code Review (SCR) or other significant industry change projects
Both the Proposer and ELEXON do not believe this Modification impacts any on-going SCR, ELEXON submitted P392 to the Authority to request SCR exemption on 2 October 2019.

Impact on Consumers and the environment

No direct impacts on consumers or the environment have been identified, which will be confirmed through the Assessment Procedure.

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7 Recommendations

We invite the Panel to:

- **AGREE** that P392 progresses to the Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable;
- **AGREE** the proposed membership for the P392 Workgroup; and
- **AGREE** the Workgroup's Terms of Reference.

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronym	
Acronym	Definition
BEIS	Department for Business, Energy and Industrial Strategy
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
BRP	Balancing Responsible Party
BSP	Balancing Service Providers
CSD	Code Subsidiary Documents
CUSC	Connection and Use of System Code
EBGL	European Balancing Guidelines
ENC	European Network Codes
ENTSO-E	European Network of Transmission System Operators for Electricity
IWA	Initial Written Assessment
NETSO	National Electricity Transmission System Operator
T and C	Terms and Conditions
TSO	Transmission System Operator
W/C	Week Commencing

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	European Balancing Guidelines	https://www.entsoe.eu/network_codes/eb/ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32017R2195
4	First Proposal for EBGL Article 18	https://www.nationalgrideso.com/document/117301/download

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External Links		
Page(s)	Description	URL
4	First Request for Amendment	https://www.ofgem.gov.uk/publications-and-updates/decision-request-amendment-transmission-system-operators-proposal-terms-and-conditions-related-balancing
4	Second Proposal for EBGL Article 18	https://www.nationalgrideso.com/codes/european-network-codes/meetings/consultation-amended-proposal-ebgl-article-18-terms-and
4	Second Request for Amendment	https://www.ofgem.gov.uk/publications-and-updates/decision-request-further-amendments-transmission-system-operators-proposal-terms-and-conditions-related-balancing-accordance-article-18-commission-regulation-eu-20172195

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