Workgroup Consultation Response Proforma

**CMP/GC/CM/GSRXXX: Mod title**

Industry parties are invited to respond to this consultation expressing their views and supplying the rationale for those views, particularly in respect of any specific questions detailed below.

Please send your responses to cusc.team@nationalgrideso.com grid.code@nationalgrideso.com stcteam@nationalgrideso.com box.sqss@nationalgrideso.com by **5pm** on **DAY MONTH YEAR**. Please note that any responses received after the deadline or sent to a different email address may not receive due consideration.

If you have any queries on the content of this consultation, please contact XXXXX XXXXX XXX.XXXXX@nationalgrideso.com or cusc.team@nationalgrideso.com grid.code@nationalgrideso.com stcteam@nationalgrideso.com box.sqss@nationalgrideso.com

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| **Respondent details** | **Please enter your details** |
| **Respondent name:** | Click or tap here to enter text. |
| **Company name:** | Click or tap here to enter text. |
| **Email address:** | Click or tap here to enter text. |
| **Phone number:** | Click or tap here to enter text. |
| **Which best describes your organisation?** | [ ] Consumer body[ ] Demand[ ] Distribution Network Operator[ ] Generator[ ] Industry body[ ] Interconnector | [ ] Storage[ ] Supplier[ ] System Operator[ ] Transmission Owner[ ] Virtual Lead Party[ ] Other |

**I wish my response to be:**

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| (Please mark the relevant box) | [ ]  Non-Confidential *(this will be shared with industry and the Panel for further consideration)* |
|  | [ ]  **Confidential** (this *will be disclosed to the Authority in full but, unless specified, will not be shared with the Workgroup, Panel or the industry for further consideration)* |

**For reference the Applicable Grid Code Objectives are:**

1. *To permit the development, maintenance and operation of an efficient, coordinated and economical system for the transmission of electricity*
2. *Facilitating effective competition in the generation and supply of electricity (and without limiting the foregoing, to facilitate the national electricity transmission system being made available to persons authorised to supply or generate electricity on terms which neither prevent nor restrict competition in the supply or generation of electricity);*
3. *Subject to sub-paragraphs (i) and (ii), to promote the security and efficiency of the electricity generation, transmission and distribution systems in the national electricity transmission system operator area taken as a whole;*
4. *To efficiently discharge the obligations imposed upon the licensee by this license and to comply with the Electricity Regulation and any relevant legally binding decisions of the European Commission and/or the Agency; and*
5. *To promote efficiency in the implementation and administration of the Grid Code arrangements*

**For reference the Applicable CUSC (non-charging) Objectives are:**

1. *The efficient discharge by the Licensee of the obligations imposed on it by the Act and the Transmission Licence;*
2. *Facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the sale, distribution and purchase of electricity;*
3. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
4. *Promoting efficiency in the implementation and administration of the CUSC arrangements.*

*\**The Electricity Regulation referred to in objective (c) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*.*

**For reference the Applicable CUSC (charging) Objectives are:**

1. *That compliance with the use of system charging methodology facilitates effective competition in the generation and supply of electricity and (so far as is consistent therewith) facilitates competition in the sale, distribution and purchase of electricity;*
2. *That compliance with the use of system charging methodology results in charges which reflect, as far as is reasonably practicable, the costs (excluding any payments between transmission licensees which are made under and accordance with the STC) incurred by transmission licensees in their transmission businesses and which are compatible with standard licence condition C26 requirements of a connect and manage connection);*
3. *That, so far as is consistent with sub-paragraphs (a) and (b), the use of system charging methodology, as far as is reasonably practicable, properly takes account of the developments in transmission licensees’ transmission businesses;*
4. *Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency \*; and*
5. *Promoting efficiency in the implementation and administration of the system charging methodology.*

*\*The Electricity Regulation referred to in objective (d) is Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) as it has effect immediately before IP completion day as read with the modifications set out in the SI 2020/1006.*

**For reference the Applicable STC Objectives are:**

1. *efficient discharge of the obligations imposed upon transmission licensees by transmission licences and the Act*
2. *development, maintenance and operation of an efficient, economical and coordinated system of electricity transmission*
3. *facilitating effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity*
4. *protection of the security and quality of supply and safe operation of the national electricity transmission system insofar as it relates to interactions between transmission licensees*
5. *promotion of good industry practice and efficiency in the implementation and administration of the arrangements described in the STC.*
6. *facilitation of access to the national electricity transmission system for generation not yet connected to the national electricity transmission system or distribution system;*
7. *compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.*

**For reference the Applicable SQSS Objectives are:**

1. *facilitate the planning, development and maintenance of an efficient, coordinated and economical system of electricity transmission, and the operation of that system in an efficient, economic and coordinated manner;*
2. *ensure an appropriate level of security and quality of supply and safe operation of the National Electricity Transmission System;*
3. *facilitate effective competition in the generation and supply of electricity, and (so far as consistent therewith) facilitating such competition in the distribution of electricity; and*
4. *facilitate electricity Transmission Licensees to comply with any relevant obligations under EU law.*

**For reference, (for consultation questions 5 & 6) the Electricity Balancing Regulation (EBR) Article 3 Objectives and regulatory aspects are:**

1. *fostering effective competition, non-discrimination and transparency in balancing markets;*
2. *enhancing efficiency of balancing as well as efficiency of national balancing markets;*
3. *integrating balancing markets and promoting the possibilities for exchanges of balancing services while contributing to operational security;*
4. *contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector while facilitating the efficient and consistent functioning of day-ahead, intraday and balancing markets;*
5. *ensuring that the procurement of balancing services is fair, objective, transparent and market-based, avoids undue barriers to entry for new entrants, fosters the liquidity of balancing markets while preventing undue market distortions;*
6. *facilitating the participation of demand response including aggregation facilities and energy storage while ensuring they compete with other balancing services at a level playing field and, where necessary, act independently when serving a single demand facility;*
7. *facilitating the participation of renewable energy sources and supporting the achievement of any target specified in an enactment for the share of energy from renewable sources.*

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| **What is the EBR?** |
| The Electricity Balancing Regulation (EBR) is a European Network Code introduced by the Third Energy Package European legislation in late 2017.The EBR regulation lays down the rules for the integration of balancing markets in Europe, with the objectives of enhancing Europe’s security of supply. The EBR aims to do this through harmonisation of electricity balancing rules and facilitating the exchange of balancing resources between European Transmission System Operators (TSOs). Article 18 of the EBR states that TSOs such as the ESO should have terms and conditions developed for balancing services, which are submitted and approved by Ofgem. |

**Please express your views in the right-hand side of the table below, including your rationale.**

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| **Standard Workgroup Consultation questions** |
| 1 | Do you believe that the Original Proposal and/or any potential alternatives better facilitate the Applicable Objectives? | Mark the Objectives which you believe each solution better facilitates: |
| Original | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| WA(G)CM1 | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| WA(G)CM2 | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| WA(G)CM3 | [ ] A [ ] B [ ] C [ ] D [ ] E [ ] F [ ] G |
| Click or tap here to enter text. |
| 2 | Do you support the proposed implementation approach? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 3 | Do you have any other comments? | Click or tap here to enter text. |
| 4 | Do you wish to raise a Workgroup Consultation Alternative Request for the Workgroup to consider?  | [ ] Yes (the request form can be found in the Workgroup Consultation Section)[ ] No |
| Click or tap here to enter text. |
| 5 | Does the draft legal text satisfy the intent of the modification? | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 6 | Do you agree with the Workgroup’s assessment that MODXXX does/does not impact the Electricity Balancing Regulation (EBR) Article 18 terms and conditions held within the [Code]?  | [ ] Yes[ ] No |
| Click or tap here to enter text. |
| 7 | Do you have any comments on the impact of MODXXX on the EBR Objectives? | [ ] Yes[ ] No |
| Click or tap here to enter text. |

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| **Specific Workgroup Consultation questions** |
| 8 |  | Click or tap here to enter text. |
| 9 |  | Click or tap here to enter text. |
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| 12 |  | Click or tap here to enter text. |