

Appendix B - Response Proforma

National Grid invites responses to this consultation by **8th 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

Respondent:	Kate Garth
Company Name:	Npower Ltd
Does this response contain confidential information? If yes, please specify.	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	The contents page (page 4 of Appendix A pdf document) incorrectly states : PART E ABSVD Methodology for BM participants This should be amended to show: PART E ABSVD Methodology for nonBM Participants, reflecting the changes shown in Table 1.
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.	Yes	On the basis that without these changes to the ABSVD methodology, the changes contained with the BSC P354 would not deliver the specified objectives
3	Do you have any other comments in relation to the changes proposed to the ABSVD?	Yes	We are concerned that this consultation into proposed changes to the ABSVD methodology have been prepared in advance of the final outcome of the P354 solution, and importantly whether suppliers will (as the both the P354 work group and panel members voted to recommend) receive confirmation regarding which MSIDs have caused the adjustment to the Balancing Responsible Party (the Supplier) imbalance position. In the event that Ofgem does not decide to facilitate the effective provision of data (relating to the nonBM participant MSID), which has resulted in the ABSVD adjustment, we remain very concerned that neither the P354 solution nor the changes to the ABSVD methodology would deliver an efficient and effective solution and instead would replace the inefficiency highlighted at the BSC level to a downstream to the supplier / customer contractual relationship rather than being properly addressed.