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19 June 2025

Re: Quick Reserve data publication proposal.

Dear James,

On 25 April 2025 NESO, following industry consultation in accordance with Commission Regulation (EU) 2017/2195 of 23 November 2017 as converted into assimilated EU law and amended (EBR), NESO submitted its proposed changes to Balancing to implement phase 2 of the Quick Reserve (QR) service.

Subsequent to that, on 16 May 2025, NESO published pursuant to the EBR its proposed changes to Balancing for the introduction of Slow Reserve (SR). You will recall that, alongside the principal changes for SR, we also consulted on a proposed change to the QR Service Terms (a modified paragraph 20.12) in order to facilitate provision of additional close to real-time availability and dispatch data transparency, where this data is not already published through the Balancing and Settlements Code (BSC). This proposed change reflected a similar clause in the proposed new SR Service Terms, and is set out in Annex 1.

As covered under the modified paragraph 20.12, and in addition to the publication of dispatch data intended from Quick Reserve phase 2 go-live, we will be in a position to commence publication of additional close to real-time non-BM availability and baseline data from the end of September 2025.

Therefore, in the event that you are minded to approve the QR documentation as submitted, we now formally request that the proposed changes submitted to you for approval in April be revised so as to incorporate this modified paragraph 20.12. For the avoidance of doubt, we envisage that

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you may elect to approve the QR documentation with that modified paragraph 20.12, or alternatively as originally submitted to you (i.e. without it). Our clear preference is the former, as this will negate the need to make a separate change to the QR Service Term in due course if and when subsequently approved as part of the SR consultation.

To assist, and as required by the EBR, we have sought and considered stakeholder comments on our proposed change to paragraph 20.12, received during the SR consultation exercise, and this is summarised in the table set out in Annex 2 together with our response.

Accompanying this letter is an updated version of the QR Service Terms as previously submitted, incorporating the modified paragraph 20.12, both as a clean document and showing redlining against the current 'live' version. For convenience, we have used the version which highlights in blue text the optional service clauses. If Ofgem were to approve the change to paragraph 20.12 alongside the QR phase 2 proposals, then we would publish this clean document as a single updated set of QR Service Terms.

Finally, we also enclose in Annex 3 an updated version of the mapping document.

If you have any queries regarding this proposal, please contact us using the above email address.

Yours sincerely,

Jon Wisdom
Head of Market Change Delivery

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Annex 1 – Data Transparency for Quick Reserve

QR phase 2 proposed paragraph 20.12 (as proposed in our 25 April 2025 submission):

Publication of data

- 20.12 For the purposes of paragraph 26 (Confidentiality) the **Service Provider** consents to **NESO** publishing all **Operational Baselines, Operational Metering Data** and **Performance Metering Data** on its website in a non-anonymised format.

Proposed new paragraph 20.12 for QR Service Terms:

Publication of data

- 20.12 For the purposes of paragraph 26 (Confidentiality) the **Service Provider** consents to **NESO** publishing on its website in a non-anonymised format any or all of:-
- 20.12.1 **Operational Baselines, Operational Metering Data** and **Performance Metering Data**;
 - 20.12.2 indications of **QR Unit** availability for **Quick Reserve** (comprising **Contracted Quantity** or **Optional MW**);
 - 20.12.3 submitted **QR Utilisation Prices**; and
 - 20.12.4 details of Instructions issued,
- in each case insofar as not already published pursuant to the **BSC**.

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Annex 2 – Industry feedback

Alongside the EBR consultation launched on 16 May 2025 proposing changes to Balancing for the introduction of Slow Reserve (SR), we also consulted on a proposed change to the QR Service Terms (a modified paragraph 20.12) in order to facilitate provision of additional close to real-time availability and dispatch data transparency, where this data is not already published through the Balancing and Settlements Code (BSC).

We asked industry to share their thoughts on the proposed new paragraph 20.12 for Quick Reserve Service Terms and we received a number of responses to which we have provided the following responses.

Company Name	Response	NESO Response
EDF Energy	<p>We welcome the proposed new paragraph and the visibility this will offer to market participants of any actions that NESO has taken on non-BM assets made available via the SR/QR services.</p> <p>Can you confirm that this data will feed into the NIV & SIP calculation process from day one please?</p>	<p>Non-BM data for QR and SR will feed into the NIV and SIP calculation from day one, in accordance with the updated BSAD Methodology Statement (subject to Ofgem approval). The data we are proposing to publish is just for further industry transparency.</p>
Flexitricity Limited	<p>See answer to Question 15 above.</p> <p>Response to Q15: Under the STOR service, capacities and market clearing price are included in the dataset. The addition of utilisation prices is new, similar to inclusion of operational and performance metering data, which we understand is not a new proposal. Flexitricity has concerns that performance metering data may expose operational failings for service providers. This has a reputational risk to service providers and as such we request NESO consider the implications this has with respect to fair market conditions.</p>	<p>The proposal related to publishing Performance Metering data is just to provide NESO with consent to publish amongst a number of other data sets, should we wish to do so. We have no plans to publish Performance Metering data from go live, as we see these as new services that require time to embed. We will monitor provider performance in accordance with the service terms with the applicable penalties applied, but in addition and where appropriate we reserve the right to consider publishing Performance Metering data in the future and would engage with industry before proposing any such publication.</p>
RWE	<p>Yes – as indicated in the answer to Q15, we are in support of NESO publishing the additional data sets.</p> <p>Response to Q15: Yes – we are in support of NESO publishing the additional data sets.</p>	<p>Thank you for the feedback and support</p>
Drax Group plc	N/A	
SSE Renewables & SSE Thermal	<p>We value transparency and are generally supportive of broadening the dataset for non-BMUs. The published datasets should be consistent across the different services.</p>	<p>Thank you for the feedback and support</p>
Tesla	No Response	

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Sembcorp Energy UK	As above with Slow Reserve, we are happy with the combined publication of this data.	Thank you for the feedback and support
Octopus Energy	Yes we support broadening the dataset for Quick Reserve.	Thank you for the feedback and support
ADE: Demand	As with the broadened publication of Slow Reserve datasets, we support the increased data transparency for Quick Reserve.	Thank you for the feedback and support
ENWL	<p>We would welcome equal data publishing requirements for BM and non-BM units across all elements which must include publication and tagging of activation data at the same time for QR capable BM units as non-BM units in the optional QR markets. Currently the planned design includes an inherent advantage for BM units as they can clearly see live non-BM unit prices on a single feed while this isn't possible for BM unit activations (this have been confirmed following extensive consultation with NESO and Elexon).</p> <p>Currently BM activation data including pricing details is visible significantly later for BM activations than for non-BM activations. BM activation data is published a significant amount of time after the period has ended, whereas non-BM activation data is published in a live online data feed.</p> <p>Equal information across market participants is a key part of market set up that does not appear to have been considered in detail by NESO, we ask that there is an in-depth review of this as part of market set up to ensure an absence of information or unequal information does not undermine market operation and benefits for customers. We would welcome full alignment on data publication between BM and non-BM units, this should be considered holistically to ensure that the unfair advantages already available to BM units are not exacerbated by the suggested amendments.</p>	<p>We agree that equal data transparency across market participants is important across the new reserve products.</p> <p>For QR non-BM units we are looking to publish (on our Data Portal) available MW, Utilisation Price and FPN, as submitted in their mandatory availability declarations into OBP, close to realtime (exact timing TBC) after gate closure for each Settlement Period. We are in the process of finalising when we will be ready to publish this data and hope for it to available soon after go live of the non-BM QR service. For a BM unit their available MW and price and FPN are published with a 5 minute SLA of gate closure (published once every 30 mins).</p> <p>We will also publish from go live (on our Data Portal) all non-BM dispatch data within 2 minutes and any change / cease also within 2 minutes after instructed. For BM unit dispatch instructions (BOAs) these are also published with a 5 minute SLA of the instruction being issue.</p> <p>We recognise that non-BM data is tagged against the relevant Balancing Service on our data portal and that is not the same for BOAs as they are not tagged at Elexon publication for a specific Balancing Service. This is partly due to Elexon and NESO system configuration constraints making it challenging to tag BOA data to a Balancing Service. But also, for Balancing Services such as Quick Reserve we are buying the capacity, and not all BM instructions for QR units are attributable to the service as they can be utilised for balancing actions and so there is not a clean separation of BOAs into different services. In contrast non-BM routes for dispatch are specified by Balancing Service (i.e. there is no route to dispatch outside of a service for non-BM) and this is why we can brake down specifically for publication. However, we are publishing auction results data, confirming which BM and non-BM units have been awarded a firm contract for each 30 minute Settlement Period, which can easily be extracted and linked to the published BM data outlined above (BOA) to derive/match the BM unit to the applicable Balancing Service.</p>

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		<p>We welcome your feedback on a review of current arrangements and we will consider the best approach to undertake a review of the data we publish across our services to ensure we have full alignment across BM and non-BM market participants for new and existing services.</p>
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Annex 3

EBR Article 18 mapping for the Quick Reserve (Phase 2) Terms and Conditions

Please note: The table below cross references the terms and conditions related to balancing described in article 18 of Commission Regulation (EU) 2017/2195 of 23 November 2017 (as incorporated into EU retained law, and as amended by the Electricity Network Codes and Guidelines (Markets and Trading) (Amendment) (EU Exit) Regulations 2019/532) (**“EBR Article 18”**) against the corresponding parts of the GB codes and relevant contractual provisions, with particular reference to the Quick Reserve (phase 2) service. This cross referencing includes the terms and conditions for balancing service providers and the terms and conditions for balance responsible parties.

Nothing in this table shall prejudice or otherwise affect the operation of the GB codes and relevant contractual provisions, and furthermore in the event of any conflict or inconsistency between this table and EBR Article 18 the latter shall prevail.

Table 1 – Mandatory Elements

Below is the mapping of EBR Article 18 with references to the relevant Quick Reserve (phase 2) terms and conditions.

Article	Text	Code or Document	Section
18.2	The terms and conditions pursuant to paragraph 1 shall also include the rules for suspension and restoration of market activities pursuant to Article 36 of Regulation (EU) 2017/2196 and rules for settlement in case of market suspension pursuant to Article 39 of Regulation (EU) 2017/2196 once approved in	Grid Code	OC9.4
		BSC	G3, P1.6, P5, Q4.3.4, Q5.4, Q5A and T1.7

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Article	Text	Code or Document	Section
	accordance with Article 4 of Regulation (EU) 2017/2196.		
18.4	The terms and conditions for balancing service providers shall:	-	-
18.4.a	Define reasonable and justified requirements for the provisions of balancing services;	QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Pre-qualification of Eligible Assets 13 – Formation of QR Contracts
		QR Service Terms	QR Service Terms 5 – Service Availability – BM Participating 6 – Service Availability – Non-BM Participating 7 – Optional Availability (Non-BM Participating) 8 – Service Instruction 17 – Provision of Other Services Schedule 2 – QR Service Parameters
		BSC	A, H3, H4.2, H4.7, H4.8, H5.5, H6, H10, J3.3, J3.6, J3.7 and J3.8
		CUSC	4.1.3
18.4.b	allow the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to offer balancing services subject to conditions referred to in paragraph 5 (c);	Grid Code	BC1, BC2, BC3 & BC4
		BSC	K3.3, K8, S6.2, S6.3 and S11, S12, S13 and S14
		Grid Code	DRSC 4.2, BC1.4
		QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants

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Article	Text	Code or Document	Section
			5 – Pre-qualification of Eligible Assets 6 – Allocation of Eligible Assets to Auction Units Schedule 2 – Registration and Pre-Qualification Procedure
18.4.c	allow demand facility owners, third parties and owners of power generating facilities from conventional and renewable energy sources as well as owners of energy storage units to become balancing service providers;	BSC	K3.2, K3.3, K8
		QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Pre-qualification of Eligible Assets Schedule 2 – Registration and Pre-Qualification Procedure
18.4.d	require that each balancing energy bid from a balancing service provider is assigned to one or more balance responsible parties to enable the calculation of an imbalance adjustment pursuant to Article 49.	BSC	T4, Q7.2, Q6.4
18.5	The terms and conditions for balancing service providers shall contain:	–	–
18.5.a	the rules for the qualification process to become a balancing service provider pursuant to Article 16;	QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Pre-qualification of Eligible Assets Schedule 2 – Registration and Pre-Qualification Procedure

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Article	Text	Code or Document	Section
		Grid Code	BC5, BC4.4.2
		CUSC	4.1
		BSC	J3.3, J3.6, J3.7, J3.8, K3.2, K3.3 and K8
18.5.b	the rules, requirements and timescales for the procurement and transfer of balancing capacity pursuant to Articles 32 and 34;	QR Procurement Rules QR Service Terms	QR Procurement Rules 8 – Buy Orders 9 – Sell Orders 10 – Market Clearing Rules 13 – Formation of QR Contracts QR Service Terms 8 – Service instruction 25 – Transfer of QR Contracts
18.5.c	the rules and conditions for the aggregation of demand facilities, energy storage facilities and power generating facilities in a scheduling area to become a balancing service provider;	QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Pre-qualification of Eligible Assets 6 – Allocation of Eligible Assets to Auction Units Schedule 2 – Registration and Pre-Qualification Procedure
		BSC	K3.3 and K8
		Grid Code	BC1.4 and BC1.A.10

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Article	Text	Code or Document	Section
18.5.d	the requirements on data and information to be delivered to the connecting TSO and, where relevant, to the reserve connecting DSO during the prequalification process and operation of the balancing market;	QR Procurement Rules	QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Pre-qualification of Eligible Assets 9 – Sell Orders 14 – Confidentiality Schedule 2 – Registration and pre-qualification Procedure QR Service Terms 5 – Service Availability – BM Participating 6 – Service Availability – Non-BM Participating 7 – Optional Availability – Non-BM Participating 8 – Service Instruction 9 – Service Delivery – BM Participating 10 – Service Delivery – Non-BM Participating 20 – Monitoring and Metering 23 – Records and Audits
		QR Service Terms	
		BSC	
		Grid Code	
		CUSC	
18.5.e	the rules and conditions for the assignment of each balancing energy bid from a balancing service provider to one or more balance responsible parties pursuant to paragraph 4 (d);	BSC	T4
		QR Procurement Rules	QR Procurement Rules 13 – Formation of QR Contracts QR Service Terms 24 – Assignment
		QR Service Terms	

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Article	Text	Code or Document	Section
			25 – Transfer of QR Contracts
18.5. f	the requirements on data and information to be delivered to the connecting TSO and, where relevant, to the reserve connecting DSO to evaluate the provisions of balancing services pursuant to Article 154(1), Article 154(8), Article 158(1)(e), Article 158(4)(b), Article 161(1)(f) and Article 161(4)(b) of Regulation (EU) 2017/1485;	QR Service Terms	QR Service Terms 5 – Service Availability – BM Participating 6 – Service Availability – Non-BM Participating 7 – Optional Availability (Non-BM Participating) 9 – Service Delivery – BM Participating 10 – Service Delivery – Non-BM Participating 20 – Monitoring and Metering 23 – Records and Audits
		Grid Code	BC1.4, BC1.A.10,
		CUSC	4.1.3.19
18.5. g	the definition of a location for each balancing product taking into account paragraph 5 (c);	Grid Code	BC1.4
18.5.h	the rules for the determination of the volume of balancing energy to be settled with the balancing service provider pursuant to Article 45;	BSC	T3
18.5. i	the rules for the settlement of balancing service providers defined pursuant to Chapters 2 and 5 of Title V;	QR Service Terms	QR Service Terms 5 – Service Availability – BM Participating 6 – Service Availability – Non-BM Participating 7 – Optional Availability (Non-BM Participating)

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Article	Text	Code or Document	Section
			9 – Service Delivery – BM Participating 10 – Service Delivery – Non-BM Participating 11 – QR Availability Payments 12 – Energy Utilisation Payments 13 – Payment Procedure Schedule 3 – QR Availability Payments Schedule 4 – QR Utilisation Payments Schedule 5 – Payment Provisions
		BSC	T1.14, T3 and U
		CUSC	4.1.3.9 and 4.1.3.9A
18.5.j	a maximum period for the finalisation of the settlement of balancing energy with a balancing service provider in accordance with Article 45, for any given imbalance settlement period;	QR Service Terms	QR Service Terms 11 – QR Availability Payments 12 – Energy Utilisation Payments 13 – Payment Procedure Schedule 3 – QR Availability Payments Schedule 4 – QR Utilisation Payments Schedule 5 – Payment Provisions
		BSC	U2.2
		CUSC	4.3.2.6

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Article	Text	Code or Document	Section
18.5. k	the consequences in case of non-compliance with the terms and conditions applicable to balancing service providers.		QR Procurement Rules 4 – Registration of Registered Auction Participants 5 – Prequalification of Eligible Assets Schedule 2 – Registration and Pre-Qualification Procedure
		QR Procurement Rules	QR Service Terms 5 – Service Availability – BM Participating 6 – Service Availability – Non-BM Participating 9 – Service Delivery – BM Participating 10 – Service Delivery – Non-BM Participating 17 – Provision of Other Services 19 – Termination of QR Contracts 20 – Monitoring and Metering
		QR Service Terms	
		BSC	H3, Z7 and A5.2
		CUSC	4.1.3.9, 4.1.3.9A and 4.1.3.14
18.6	The terms and conditions for balance responsible parties shall contain:	-	-
18.6. a	the definition of balance responsibility for each connection in a way that avoids any gaps or overlaps in the balance responsibility of different market participants providing services to that connection;	BSC	K1.2, P3 and T4.5

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Article	Text	Code or Document	Section
18.6.b	the requirements for becoming a balance responsible party;	BSC	A, H3, H4.2, H4.7, H4.8, H5.5, H6, H10, J3.3, J3.6, J3.7, J3.8, K2, K3.3 and K8
18.6.c	the requirement that all balance responsible parties shall be financially responsible for their imbalances, and that the imbalances shall be settled with the connecting TSO;	BSC	N2, N6, N8, N12, and T4,
18.6.d	the requirements on data and information to be delivered to the connecting TSO to calculate the imbalances;	BSC	O, Q3, Q5.3, Q5.6, Q6.2, Q6.3, Q6.4
		Grid Code	BC1.4.2,3,4, BC1 Appendix 1 BC2.5.1,
18.6.e	the rules for balance responsible parties to change their schedules prior to and after the intraday energy gate closure time pursuant to paragraph 4 of Article 17;	BSC	P2
		Grid Code	BC1.4.3,4,
18.6.f	the rules for the settlement of balance responsible parties defined pursuant to Chapter 4 of Title V;	BSC	T4, U2
18.6.g	the delineation of an imbalance area pursuant to Article 54(2) and an imbalance price area;	-	<i>GB constitutes one imbalance area and imbalance price area and they are equal to the synchronous area</i>
18.6.h	a maximum period for the finalisation of the settlement of imbalances with balance responsible parties for any given imbalance settlement period pursuant to Article 54;	BSC	U2.2
18.6.i	the consequences in case of non-compliance with the terms	BSC	H3,Z7 and A5.2

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Article	Text	Code or Document	Section
	and conditions applicable to balance responsible parties;		
18.6.j	an obligation for balance responsible parties to submit to the connecting TSO any modifications of the position;	BSC	P2
18.6.k	the settlement rules pursuant to Articles 52, 53, 54 and 55;	BSC	T4, U2
18.6.l	where existing, the provisions for the exclusion of imbalances from the imbalance settlement when they are associated with the introduction of ramping restrictions for the alleviation of deterministic frequency deviations pursuant to Article 137(4) of Regulation (EU) 2017/1485.	Deterministic frequency deviation is a continental European concept and is not a characteristic of the GB system. Therefore, this requirement does not apply to GB.	N/A

Table 2 – Non- Mandatory elements

Article	Text	Comment
18.7. a	–	Sub-paragraph 18.7.a was repealed pursuant to paragraph 18(6)(a) of Schedule 2 of the Electricity Network Codes and Guidelines (Markets and Trading) (Amendment) (EU Exit) Regulations 2019/532.
18.7. b	where justified, a requirement for balancing service providers to offer the unused generation capacity or other balancing resources through balancing energy bids in the balancing markets after day ahead market gate closure	NESO does not expect to require this from Balancing Service Providers, except where balancing capacity or energy has been contracted. Although in the BM defaulting rules apply if data is not updated, there is no legal requirement for parties to offer unused

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	time, without prejudice to the possibility of balancing service providers to change their balancing energy bids prior to the balancing energy gate closure time due to trading within intraday market;	generation capacity or any other balancing resource.
	-	Sub-paragraph 18.7.c was repealed pursuant to paragraph 18(6)(c) of Schedule 2 of the Electricity Network Codes and Guidelines (Markets and Trading) (Amendment) (EU Exit) Regulations 2019/532.
18.7. d	specific requirements with regard to the position of balance responsible parties submitted after the day-ahead market timeframe to ensure that the sum of their internal and external commercial trade schedules equals the sum of the physical generation and consumption schedules, taking into account electrical losses compensation, where relevant;	NESO does not expect to require this from Balancing Service Providers. No BSC party is required to contract to match its Final Physical Notifications (FPNs).
18.7. e	an exemption to publish information on offered prices of balancing energy or balancing capacity bids due to market abuse concerns pursuant to Article 12(4)	NESO does not expect to require this exemption. Such data is published on Insights Real-Time Information Service (IRIS).
18.7. f	an exemption to predetermine the price of the balancing energy bids from a balancing capacity contract pursuant to Article 16(6)	-
18.7. g	An application for the use of dual pricing for all imbalances based on the conditions established pursuant to Article 52(2)(d)(i) and 52(2)(d)(ii).	NESO does not expect to apply for the use of dual pricing for all imbalances. A single imbalance price was adopted by the GB market in November 2015.