

Public

Annex 1 – C9 Consultation Responses

Submitted: 13th February 2026

C9 Licence Statement	Feedback channel	Consultation Question Number	Change ID	Page number specific to the	Change ID description	Question	Stakeholder	Industry Response	NESO Response	Feedback resulted in change to C9 Statements at report	If Col K = Yes, Page number for consequential change within tracked change statement for report
N/A	Informal Consultation	N/A	N/A	N/A	N/A	N/A	Endu	Provided an innovation project proposal and were seeking funding. NESO considered this to be out of scope for the C9 consultation and changes proposed.	Thank you for submitting your proposal. However, please note that your proposal does not fall within the scope of this C9 consultation. We have shared this with the innovation teams for their awareness and we encourage you to formally submit this big idea on the Innovation Strategy section of our website. We appreciate your engagement and encourage you to continue sharing your ideas with NESO in the future.	No	n/a
BPS, PGS	Informal Consultation	All	BPS.07, BPS.13, PGS.28	31, All, All	Wording updates and added within the Net Transfer Capacity (NTC) description, within Part C, section 10 (p31), Balancing Principles Statement, Procurement Guidelines Statement	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.) Do you have any further comments or amendments you would like to see regarding the BPS? Do you have any further comments or amendments you would like to see regarding the PGS?	Eleclink	Eleclink Limited ("Eleclink") welcomes the opportunity to respond to the National Energy System Operator ("NESO")'s C9 Consultation Annual Review Informal Consultation (the "Consultation"). Eleclink is a 1000MW HVDC electricity interconnector between Great Britain and France, which commenced full commercial operations in May 2022. Following responses to previous C16 and C9 consultations, Eleclink welcomes the proposed revision to the Balancing Principles Statement (BPS) clarifying that "NTC will not be used where feasible economic market-based alternative actions are available to resolve the system issue." This represents a positive change, aligning the BPS with Ofgem's C28 derogation decision which allows for the procurement of NTC limits under specific circumstances, namely, as a tool of last resort to ensure system security. We trust NTC procurement will now be reflected consistently in real-time operational practices within the NESO's control room. As we have previously set out in correspondence with the NESO, whilst we recognise the significant role that the NESO has in balancing the electricity grid and ensuring system security, the current usage frequency of NTC limits on GB interconnectors remains a significant concern. These actions directly restrict the ability of interconnector operators from releasing remaining available capacity into the market, whilst having direct impacts on connected electricity markets through the reduction or cessation of electricity imports and/or exports.	Thank you for your feedback and for your support for the proposed changes to the Balancing Principles Statement in relation to NTCs. On the points raised regarding Eleclink's NTC limits and volumes, and the suggestion that these may indicate a need for wider service or market reforms, these issues fall outside the scope of the changes proposed within this C9 consultation. We will consider this feedback in coordination with Ofgem during discussions on the future of NTCs. NESO also values and welcomes suggestions from industry for new product designs which could increase interconnector flexibility and ensure grid system security. On the comment regarding market transparency of the tools NESO uses to manage the system and suggestion of the supplementary annex, we note that the Official Order of Actions is publicly available on the NESO website, providing industry stakeholders with information on the actions considered by NESO for both positive margin(1) and negative margins(2). (1) https://www.neso.energy/document/268116/download (2) https://www.neso.energy/document/362026/download	No	n/a
ABSVD	Informal Consultation	1	ABSVD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	2	ABSVD.02	All	Wording for Transmission License updated to NESO Electricity System Operator License and clarity provided for references to NESO (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	3	ABSVD.03	All	Legacy references to C16 updated to C9 as relevant (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	4	ABSVD.04	7-15	Restructuring of the start of the statement: introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A (pp7-15).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	5	ABSVD.05	16	Wording removed and existing wording updated within Part B, section 1 Basis of Calculation (p16).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	6	ABSVD.06	16-22	Wording removed, existing wording updated, and section retitled within Part B, section 1.1 Variables included in the ABSVD and Section 1.2 Balancing Services for inclusion in the ABSVD (pp16-22).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

ABSVD	Informal Consultation	7	ABSVD.07	22-23	Wording updated within Part B, section 1.3 ABSVD Provision (pp22-23).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	8	ABSVD.08	23	Wording updated within Part B, section 1.5 Re-submission of ABSVD (p23).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	9	ABSVD.09	24-25	Existing Wording for Disputes have been moved to within Part B: Applicable Balancing Services Volume Data 'ABSVD For BM Participants (pp24-25).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	10	ABSVD.10	26-32	Wording updated, section retitled and synthesised for Part C: Applicable Balancing Services Volume Data (ABSVD) For Non-BM Providers, section 1 Balancing Services for inclusion in the ABSVD and section 2. ABSVD Calculation for Non-BM Providers for Applicable Reserve Balancing Services(pp26-32).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	11	ABSVD.11	33	New section added, 2. Registration of Metering System Identifier (MSID) pairs (p33).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	12	ABSVD.12	33-35	Wording updated within Part C, section 3. ABSVD Provision for Applicable Reserve Balancing Services from Non-BM Providers" (pp33-35)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	13	ABSVD.13	35	Part C, Section 4. ABSVD Calculation and Submission for Non-BM Providers for Applicable Response Balancing Services removed (p35)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	14	ABSVD.14	35-36	Wording updated within Part C, Section 5 Re-submission of ABSVD section (pp35-36).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	15	ABSVD.15	36-38	Existing Wording for Disputes have been moved to within Part C: Applicable Balancing Services Volume Data 'ABSVD For Non-BM Participants (pp36-38), no change to wording.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	16	ABSVD.16	39-49	Removal of Part D: ABSVD Methodology for BM Participants, section 1. Principles within Part D ABSVD Methodology for BM Participants section (pp39-49)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	17	ABSVD.17	51-58	Removal of Part D, Section 3. Worked examples, Section 3.1 Provision of Mode A Frequency Response example and 3.2 Provision of Short Term Operating Reserve (STOR) (pp51-58).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

ABSVD	Informal Consultation	18	ABSVD.18	59	Removal of Part E ABSVD Methodology for Non-BM Providers section 1. Principles (p59).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	19	ABSVD.19	61-62	Removal of Part E, Section 3. Calculation of ABSVD removed, within Part E ABSVD Methodology for Non-BM Providers (pp61-62).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Informal Consultation	20	ABSVD.20	All	ABSVD Methodology Statement	Do you have any further comments or amendments you would like to see regarding the ABSVD statement?	Zenobe	No further comments.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	1	BPS.01	All	General housekeeping updates to formatting, spelling, grammar, contact information and link updates as normal (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	2	BPS.02	All	Legacy references to "ESO", "NGESO" "National Grid" deleted and replaced with "NESO" where applicable (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	3	BPS.03	All	Legacy References to C16 updated to C9 as relevant (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	4	BPS.04	11	Wording updated within Part B General Principles, section 1 License Duties (p11).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	5	BPS.05	12	Wording updated within Part B General Principles, section 1 License Duties (p12).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	6	BPS.06	26	Wording added to Balancing Principles Part C, section 4 to include Trades with Non-Balancing Mechanism (Non-BM) participants to alleviate constraints where no other viable options exist (p26).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	7	BPS.07	31	Wording updates and added within the Net Transfer Capacity (NTC) description, within Part C, section 10 (p31).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	8	BPS.08	38	Wording updated relating to MW Dispatch, within Part D, section 2.5 (p38).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	9	BPS.09	41	Wording added relating to Dynamic Containment, within Part D, section 3.1 (p41).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	10	BPS.10	42-43	Wording updated and added relating to Balancing Reserve within Part D, section 3.2 (b) (pp42-43).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

BPS	Informal Consultation	11	BPS.11	44	Wording updated relating to Quick Reserve within Part D, section 3.2 (e) (p44).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	12	BPS.12	45	Wording updated relating to Slow Reserve Part D, section 3.2 (f) (p45).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Informal Consultation	13	BPS.13	All	Balancing Principles Statement	Do you have any further comments or amendments you would like to see regarding the BPS?	Zenobe	<p>Page 34 – 2.1 (i) this should reference all Network Operators and not just NGET.</p> <p>Page 36 – Steps 4 & 5, we believe this should also consider other constraint markets (not just BM Start-Up) as a way to manage the cost of the transmission constraints.</p> <p>The BPS mentions BM Start-Up regularly as a solution that NESO can use. This service is no longer open to new providers, please can NESO share the latest data on how much this service is used as the previous data references 2016 which is almost 10 years ago. We believe the BPS should be updated to reflect the latest tools that NESO have access to.</p>	<p>Thank you for your feedback.</p> <p>Regarding point 1, we agree it should read Transmission Owner and have proposed this as an update to the BPS Statement accordingly.</p> <p>Regarding point 2, we have proposed to update the wording accordingly within the BPS to reflect that other Balancing Services, not just the BM Start Up service, are considered to maintain system security of the transmission system at the day ahead stage.</p> <p>Regarding point 3. BM Start Up, it is important that although some services are occasionally or rarely used, that they are still available for the control room to use. BM start up data generally relates to conventional units, which need a longer time to synchronise safely. BM startup instructions and costs are published at real time on NESO SONAR, whilst Balancing Services are procured through a day ahead auction. The auctions results are published here Balancing Reserve Auction Results NESO.</p> <p>Link 1: https://extranet.neso.energy/NesoSonar Link 2: https://www.neso.energy/data-portal/eac-br-auction-results</p>	Yes	Point 1 - 35 Point 2 - 37
BSAD	Informal Consultation	1	BSAD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	2	BSAD.02	All	Legacy references to "ESO", "NGESO" "National Grid" deleted and replaced with "NESO" where applicable (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	3	BSAD.03	All	Legacy references to other conditions under the transmission licence updated to reflect new condition references under the Electricity System Operator Licence i.e. references to C16 updated to C9 as relevant (pp all).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	4	BSAD.04	7-13	Restructuring of the start of the statement: introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A (pp7-13).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	5	BSAD.05	13-14	Part B: Balancing Services Adjustment Data (BSAD) section updated. Existing wording removed, updated and new wording added (pp13-14).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	6	BSAD.06	15-16	Part B, section 2. Balancing Service Adjustment Actions wording updated (pp15-16).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

BSAD	Informal Consultation	7	BSAD.07	16-22	Part B, section 2.1 Balancing Services included within Balancing Service Adjustment Actions wording removed and updated (pp16-22).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	8	BSAD.08	23	Wording removed from within Part B, section 3. Buy Price Adjuster (BPA) section (p23).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	9	BSAD.09	25-26	Wording removed and updated from within Part B, section 3.1, BM Start Up (pp25-26).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	10	BSAD.10	27-28	Wording added and existing wording updated within Part B, section 3.1.2 Worked Example: Buy Price Adjuster (pp27-28).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	11	BSAD.11	29-31	Wording added and existing wording updated within Part C, section 1. BSAD submission (pp29-31).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	12	BSAD.12	32-33	Wording removed and existing wording updated from Part C, section 2. Re-submission of BSAD section (pp32-33).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BSAD	Informal Consultation	13	BSAD.13	All	BSAD Methodology statement	Do you have any further comments or amendments you would like to see regarding the BSAD statement?	Zenobe	No further comments.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	1	PGS.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal (pp all)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	2	PGS.02	13	Wording added to Balancing Mechanism Offers and Bid section, within Part B, section 1 (p13).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	3	PGS.03	14	Wording update of 'Forward Plan' to 'Business Plan', within Part B section 2 (p14).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	4	PGS.04	19-20	Wording added and updated to Part B, section 3. Taking actions outside the Balancing Mechanism, relating to Forward Trading (pp19-20).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	5	PGS.05	20	Wording added for Net Transfer Capacity (NTC) section, within Part B, section 3 (p20).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	6	PGS.06	21-23	Wording added and updated to Part C, section 1 System Ancillary Services (pp21-23).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

PGS	Informal Consultation	7	PGS.07	23-24	Wording removed relating to Dynamic Services within Part C, section 1 The Future Requirements for Part 2 System Ancillary Services sections (p23-24).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	8	PGS.08	26	Wording for Balancing Reserve is removed from Part C, section 1 within Commercial Ancillary Services list, to section 2.1 (p26).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	9	PGS.09	29-30	Wording added for Balancing Reserve around co-optimising auction timing, within Part C section 2.1 (pp29-30).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	10	PGS.10	31	Wording updated for Quick Reserve for Non- Balancing Mechanism (Non-BM) participants, within Part C section 2.1 (p31).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	11	PGS.11	32-33	Existing wording for Super SEL moved within statement from page pp43-44 to within Part C section 2.1 (pp32-33).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	12	PGS.12	35	Wording added for Static FFR (SFFR) to reflect proposed changes to the service (p35).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	13	PGS.13	35-38	Wording updated and added for the Obligatory Reactive Power Services (ORPS) section within Part C section 2.1 (pp35-38).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	14	PGS.14	35-36	Wording related to Obligatory Reactive Power Service (ORPS), within 'Reactive Power' section removed (pp35-36).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	15	PGS.15	39	Wording added for Constraint management services section, within Part C section 2.1 (p39).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes, but we believe there should be more information added about other constraint markets being considered e.g. the Boundary Flow Smoothing project. We also believe that NESO should re-consider the rejection of implementing more formal Constraint Markets now that we have a Reformed National Market being developed. Constraint markets will be key to managing the network and costs of constraints.	Thank you for the feedback. We have proposed to include further information within the PGS to provide clarity on the Constraints Collaboration Project (CCP), which encompasses three projects including the Boundary Flow Smoothing Project. The Boundary flow smoothing innovation project is an ongoing work between NESO and our innovation partner. We have given a project update in the last CCP webinar held on 5 November 2026 and we intend to update to the industry when we conclude from the recent investigation in next CCP webinar. Further information and for updates on future engagements can also be found on the CCP webpage. Regarding implementing other constraint markets, as part of the RNP Delivery Plan, NESO is collaborating with and contributing to the government's holistic package of measures to improve how the volume and cost of constraints are managed. The action plan is due to be published soon by the government.	Yes	44-45
PGS	Informal Consultation	16	PGS.16	40	Wording updated within Megawatt Dispatch (MWD) section, within Part C section 2.1 (p40).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	17	PGS.17	40-41	Wording updated within Local Constraint Market (LCM) section within Part C section 2.1 (pp40-41).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	18	PGS.18	42-43	Wording updated and added for Demand Flexibility Service (DFS), within Part C section 2.1 (pp42-43)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

PGS	Informal Consultation	19	PGS.19	44	Wording updated to Stability markets section, within Part C section 2.1 (p44).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	20	PGS.20	45	Wording updated within Part C section 2.2, within Other Reserves – commercial (p45)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	21	PGS.21	46	Wording removed for Dynamic Frequency Response (DFRR), within Part C section 2.2 (p46).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	22	PGS.22	47	Wording updated for Enhanced Reactive Power Service (ERPS), within Part C section 2.2 (p47).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	n/a	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	23	PGS.23	50	Wording removed from Part C, section 3 Demand Side Providers and Small generators relating to Power Potential Innovation project (p50).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	24	PGS.24	54-55	Updates added to Table 1: BM Trading and System Ancillary Services, within Part D (pp54-55).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	n/a	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	25	PGS.25	55-58	Updates added to Table 2: Active Commercial Ancillary Services, within Part D (pp55-58).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	n/a	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	26	PGS.26	60-61	Updates to Table 3 Commercial Ancillary Services under review, within Part D (pp60-61).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	n/a	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	27	PGS.27	67-72	Updates to Table 2: Balancing Services Information Provision Summary, within part E (pp67-72)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	n/a	Thank you for your feedback.	No	n/a
PGS	Informal Consultation	28	PGS.28	All	Procurement Guidelines Statement	Do you have any further comments or amendments you would like to see regarding the PGS?	Zenobe	Why was "generally" added to the second to last bullet on page 15? NESO should always be publishing their requirements for Commercial Ancillary Services on their website. Not all services are covered in Table 2, e.g. page 71 should also include the other two Hydro services.	On the point raised regarding addition of the wording "generally", whilst NESO should always publish their requirements for Commercial Ancillary Services, there might be a situation whereby if were to do so, it could put the system security at risk, for example an Electricity System Restoration need. Originally having 'generally' included may have been more confusing and therefore upon reflection this was removed within the official consultation. This is also inkeeping with Part A of the statement General Provisions. On the point raised regarding point 2, thank you for your feedback. We have reviewed the table and proposed to include the other two Hydro services within the PGS Thank you for your feedback.	Yes	Point 1 – 15 (informal), 17 (report) Point 2 – 62, 73
SMAF	Informal Consultation	1	SMAF.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal (pp all)	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
SMAF	Informal Consultation	2	SMAF.02	13	Reference updated from NESO to refer to "System Operator" within paragraph referring to notifications around Automatic Low Frequency Demand Disconnection (AFDD) (p13).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

SMAF	Informal Consultation	3	SMAF.03	All	SMAF Statement	Do you have any further comments or amendments you would like to see regarding the SMAF?	Zenobe	<p>Please can NESO add clarity to statement 4 on Page 10 "4. any balancing action used by NESO primarily to manage the Rate of Change of Frequency (RoCoF) or to manage Fault Levels". We believe additional clarity can be added on what actions would fall under this e.g. inertia/voltage.</p> <p>Can NESO implement more specific flagging detail between system and energy around inertia and voltage system actions?</p> <p>Additionally, we think NESO can improve their flagging processes. Some of the issues we see are: NESO can be delayed when flagging system actions, not system flagging when actions are taken out of merit and flagged as energy but they are in fact system actions (e.g. wind), and where parties are bid off for system reasons but then the constraint stops and there are still BOAs sent because the party cannot turn off immediately (e.g. gas in Scotland) but with flagging changed to energy. All of these can cause distortions in the market when some parties know these are system flagged actions but the remainder of the market is not aware of the fact these</p>	<p>Thank you for your feedback.</p> <p>Regarding point 1 and point 2, to clarify, voltages are covered within the SMAF Methodology Statement as a transmission constraint in Part D, and inertia is linked to RoCoF. The statement '4. any balancing action used by NESO primarily to manage the Rate of Change of Frequency (RoCoF) or to manage Fault Levels' is designed to be broad (as the other statements are) to cover any balancing service (which may be developed at any time) used to manage RoCoF, or to manage Fault Levels.</p> <p>Regarding point 3 - thank you for sharing, however, this is out of scope of the C9 SMAF consultation, as this statement covers what we are flagging in the system, rather than the addressing the speed of which information is provided to industry. We recommend contacting the NESO BM Liaison & Compliance Team at bm.liaisonandcompliance@neso.energy to discuss this feedback further.</p>	No	n/a
BPS, PGS	Official Consultation	n/a	n/a	n/a	n/a	n/a	Eleclink	<p>Eleclink Limited ("Eleclink") welcome the opportunity to respond to the National Energy System Operator ("NESO")'s C9 Consultation Annual Review Official Consultation (the "Consultation"). Eleclink is a 1000MW HVDC electricity interconnector between Great Britain and France, which commenced full commercial operations in May 2022. Following our response to the Informal C9 consultation, Eleclink value the NESO's decision to share the contents of our response in the formal consultation document and welcome the opportunity for other market parties to convey further remarks on the topics raised. We look forward to reading responses from market parties following the conclusion of the consultation. However, we were disappointed not to receive any correspondence or opinion from the NESO on the suggested inclusion of a supplementary Annex which visually depicts NESO's range of tools and time-horizons at which they are employed. We believe that this would aid market transparency with no discernible reason not to include this.</p> <p>Lastly, no comment was made on the current usage frequency of NTC limits on GB interconnectors and whether any change would be expected following the BPS11 wording update. As previously mentioned, if NTC limits are being applied strictly in line with the updated BPS principles and Ofgem's derogation decision, in which the usage of NTC limits are premised as being a tool of last resort, such a volume of actions could imply a substantial need for the NESO to reassess its Procurement Guidelines and whether there is an urgent need to work with industry to identify where additional services are required and expand the range of tools and services that the NESO has at its disposal for managing the grid.</p>	<p>Thank you for your feedback and for your continued engagement to the C9 process.</p> <p>We acknowledge Eleclink's feedback regarding the absence of a direct NESO response to the proposal for a supplementary annex. To ensure transparency and clear traceability between stakeholder feedback and NESO's final position, the final C9 Annual Review report includes an annex summarising all feedback received during both the informal and formal consultation stages, along with NESO's responses. We appreciate Eleclink's comments on the need for clearer transparency around how informal consultation feedback is used. As part of our ongoing process development, we will review how we can better show the link between stakeholder input and final decisions, including providing earlier visibility of NESO's initial views where appropriate.</p> <p>We understand Eleclink's view that a visual summary of NESO's operational tools and time horizons could improve transparency. We note that much of this information is already publicly available on the website, as our Official Order of Actions provides industry stakeholders with information on the actions considered by NESO for both positive margin (https://www.neso.energy/document/268116/download) and negative margins (https://www.neso.energy/document/362026/download). The order of actions confirms the use of NTC limits as a last resort after commercial actions and system optimisations have been taken. However, we recognise the value of presenting information in a more accessible way. As part of the next review cycle, NESO will consider whether bringing this information together in a single annex would genuinely help stakeholders, while avoiding the risk of creating multiple or conflicting sources of truth. Our aim is to ensure stakeholders have one clear and reliable reference point.</p>	No	n/a
SMAF	Official Consultation	1	SMAF.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	2	SMAF.02	4	Wording added regarding development of the SMAF statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	3	SMAF.03	11	Addition of wording to section 2. The balancing services that will be SO-Flagged for Demand Flexibility Service (DFS).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	4	SMAF.04	13	Reference updated from NESO to refer to "System Operator" within paragraph referring to notifications around Automatic Low Frequency Demand Disconnection (AFDD).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	5	SMAF.05	All	SMAF Statement	Do you have any further comments or amendments you would like to see regarding the SMAF?	Zenobe	<p>Not updated from informal consultation:</p> <p>Please can NESO add clarity to statement 4 on Page 10 "4. any balancing action used by NESO primarily to manage the Rate of Change of Frequency (RoCoF) or to manage Fault Levels". We believe additional clarity can be added on what actions would fall under this e.g. inertia/voltage. Can NESO implement more specific flagging detail between system and energy around inertia and voltage system actions?</p> <p>• Additionally, we think NESO can improve their flagging processes. Some of the issues we see are: NESO can be delayed when flagging system actions, not system flagging when actions are taken out of merit and flagged as energy but they are in fact system actions (e.g. wind), and where parties are bid off for system reasons but then the constraint stops and there are still BOAs sent because the party cannot turn off immediately (e.g. gas in Scotland) but with flagging changed to energy .</p> <p>• All of these can distort the market where some parties are aware these actions are system-flagged while the wider</p>	<p>Thank you for your feedback.</p> <p>Regarding point 1 and point 2, to clarify, voltages are covered within the SMAF Methodology Statement as a transmission constraint in Part D, and inertia is linked to RoCoF. The statement '4. any balancing action used by NESO primarily to manage the Rate of Change of Frequency (RoCoF) or to manage Fault Levels' is designed to be broad (as the other statements are) to cover any balancing service (which may be developed at any time) used to manage RoCoF, or to manage Fault Levels.</p> <p>Regarding point 3 - thank you for sharing, however, this is out of scope of the C9 SMAF consultation, as this statement covers what we are flagging in the system, rather than the addressing the speed of which information is provided to industry. We recommend contacting the NESO BM Liaison & Compliance Team at bm.liaisonandcompliance@neso.energy to discuss this feedback further.</p>	No	n/a
SMAF	Official Consultation	1	SMAF.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a

SMAF	Official Consultation	2	SMAF.02	4	Wording added regarding development of the SMAF statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	3	SMAF.03	11	Addition of wording to section 2. The balancing services that will be SO-Flagged for Demand Flexibility Service (DFS).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	4	SMAF.04	13	Reference updated from NESO to refer to "System Operator" within paragraph referring to notifications around Automatic Low Frequency Demand Disconnection (AFDD).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
SMAF	Official Consultation	5	SMAF.05	All	SMAF Statement	Do you have any further comments or amendments you would like to see regarding the SMAF?	Flexricity	No further comments	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	1	ABSVD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	2	ABSVD.02	All	Wording for Transmission Licence updated to NESO Electricity System Operator Licence and clarity provided for references to NESO.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	3	ABSVD.03	All	Legacy references to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	4	ABSVD.04	8-16	Restructuring of the start of the statement: introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we agree with the restructuring here.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	5	ABSVD.05	17	Wording removed and existing wording updated within Part B, section 1 Basis of Calculation.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we support removal of these calculations because all parties should be referring to the BSC. Table 1 and 2 provide welcome clarity about which service volumes are applicable and submitted to Elexon. Where these create anomalies (as identified by Issue Group 114) these should be swiftly addressed.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	6	ABSVD.06	17-23	Wording removed, existing wording updated, and section retitled within Part B, section 1.1 Variables included in the ABSVD and Section 1.2 Balancing Services for inclusion in the ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	7	ABSVD.07	23-24	Wording updated within Part B, section 1.3 ABSVD Provision.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	8	ABSVD.08	24	Wording updated within Part B, section 1.5 Re-submission of ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a

ABSVD	Official Consultation	9	ABSVD.09	25-26	Existing Wording for Disputes (pp50-52) have been moved to within Part B: Applicable Balancing Services Volume Data 'ABSVD For BM Participants, with a minor change to wording.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	10	ABSVD.10	27-34	Wording updated, section retitled and synthesised for Part C: Applicable Balancing Services Volume Data (ABSVD) For Non-Bm Providers, section 1 Balancing Services for inclusion in the ABSVD and section 2. ABSVD Calculation for Non-BM Providers for Applicable Reserve Balancing Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	We welcome the addition of services into table 3. We also approve of Note 2 - "Providing the necessary data to meet the NESO ABSVD process requirements, will be part of the contract terms for each Applicable Balancing Service". We note that DFS has had broad support from providers to align with the outcome of IG114 and P502. The service has maintained its existing ABSVD methodology in the interim. Please see comment AVSVD.19.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	11	ABSVD.11	34	New section added, Registration of Metering System Identifier (MSID) pairs.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	12	ABSVD.12	34-36	Wording updated within Part C, section 3. ABSVD Provision for Applicable Reserve Balancing Services from Non-BM Providers.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	13	ABSVD.13	36	Wording removed within Part C, Section 4. ABSVD Calculation and Submission for Non-BM Providers for Applicable Response Balancing Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	14	ABSVD.14	36-37	Wording updated within Part C, Section 5 Re-submission of ABSVD section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	15	ABSVD.15	37-39	Existing Wording for Disputes (pp60-62) have been moved to within Part C: Applicable Balancing Services Volume Data 'ABSVD For Non-BM Participants, with a minor change to wording.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	16	ABSVD.16	40-50	Removal of Part D: ABSVD Methodology for BM Participants, section 1. Principles within Part D ABSVD Methodology for BM Participants section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	17	ABSVD.17	52-59	Removal of Part D, Section 3. Worked examples, Section 3.1 Provision of Mode A Frequency Response example and 3.2 Provision of Short Term Operating Reserve (STOR).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	18	ABSVD.18	60-63	Removal of Part E ABSVD Methodology for Non-BM Providers section 1. Principles, 2. Disputes and 3. Calculation of ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a

ABSVD	Official Consultation	19	ABSVD.19	All	ABSVD Methodology Statement	Do you have any further comments or amendments you would like to see regarding the ABSVD statement?	Flexricity	As we are sure NESO are aware, Issue Group 114 considered a number of possible distortions in the market relating to the allocation of ABSVD. We strongly urge NESO to address the findings of Issue Group 114 and ensure a fully level playing field across all services, regardless of the party type which provides them.	Thank you for your feedback, we are working with industry as proposers of BSC mods P412 and P502 to improve ABSVD allocation which we believe will have benefits across all our services.	No	n/a
ABSVD	Official Consultation	1	ABSVD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	2	ABSVD.02	All	Wording for Transmission Licence updated to NESO Electricity System Operator Licence and clarity provided for references to NESO.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	3	ABSVD.03	All	Legacy references to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	4	ABSVD.04	8-16	Restructuring of the start of the statement; introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	5	ABSVD.05	17	Wording removed and existing wording updated within Part B, section 1 Basis of Calculation.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	6	ABSVD.06	17-23	Wording removed, existing wording updated, and section retitled within Part B, section 1.1 Variables included in the ABSVD and Section 1.2 Balancing Services for inclusion in the ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	7	ABSVD.07	23-24	Wording updated within Part B, section 1.3 ABSVD Provision.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	8	ABSVD.08	24	Wording updated within Part B, section 1.5 Re-submission of ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	9	ABSVD.09	25-26	Existing Wording for Disputes (pp50-52) have been moved to within Part B: Applicable Balancing Services Volume Data 'ABSVD For BM Participants, with a minor change to wording.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

ABSVD	Official Consultation	10	ABSVD.10	27-34	Wording updated, section retitled and synthesised for Part C: Applicable Balancing Services Volume Data (ABSVD) For Non-Bm Providers, section 1 Balancing Services for inclusion in the ABSVD and section 2. ABSVD Calculation for Non-BM Providers for Applicable Reserve Balancing Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	11	ABSVD.11	34	New section added, Registration of Metering System Identifier (MSID) pairs.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	12	ABSVD.12	34-36	Wording updated within Part C, section 3. ABSVD Provision for Applicable Reserve Balancing Services from Non-BM Providers.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	13	ABSVD.13	36	Wording removed within Part C, Section 4. ABSVD Calculation and Submission for Non-BM Providers for Applicable Response Balancing Services	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	14	ABSVD.14	36-37	Wording updated within Part C, Section 5 Re-submission of ABSVD section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	15	ABSVD.15	37-39	Existing Wording for Disputes (pp60-62) have been moved to within Part C: Applicable Balancing Services Volume Data 'ABSVD For Non-BM Participants, with a minor change to wording.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	16	ABSVD.16	40-50	Removal of Part D: ABSVD Methodology for BM Participants, section 1. Principles within Part D ABSVD Methodology for BM Participants section	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	17	ABSVD.17	52-59	Removal of Part D, Section 3. Worked examples, Section 3.1 Provision of Mode A Frequency Response example and 3.2 Provision of Short Term Operating Reserve (STOR).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	18	ABSVD.18	60-63	Removal of Part E ABSVD Methodology for Non-BM Providers section 1. Principles, 2. Disputes and 3. Calculation of ABSVD.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
ABSVD	Official Consultation	19	ABSVD.19	All	ABSVD Methodology Statement	Do you have any further comments or amendments you would like to see regarding the ABSVD statement?	Zenobe	No further comments.	Thank you for your feedback.	No	n/a
BSAD	Official Consultation	1	BSAD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Fletricity	Yes	Thank you for your response.	No	n/a

BSAD	Official Consultation	2	BSAD.02	All	Legacy references to "ESO", "NGESO" "National Grid" deleted and replaced with "NESO" where applicable.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	3	BSAD.03	All	Legacy references to other conditions under the transmission licence updated to reflect new condition references under the Electricity System Operator Licence i.e. references to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	4	BSAD.04	8-14	Restructuring of the start of the statement: introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	5	BSAD.05	14-15	Part B: Balancing Services Adjustment Data (BSAD) section updated. Existing wording removed, updated and new wording added.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	6	BSAD.06	16-17	Part B, section 2. Balancing Service Adjustment Actions wording updated.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	7	BSAD.07	18-24	Part B, section 2.1 Balancing Services included within Balancing Service Adjustment Actions wording removed and updated.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	8	BSAD.08	25	Wording removed from within Part B, section 3. Buy Price Adjuster (BPA) section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	9	BSAD.09	26-27	Wording removed and updated from within Part B, section 3.1, Buy Price Adjuster and BM Start Up.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	10	BSAD.10	28-29	Wording added and existing wording updated within Part B, section 3.1.2 Worked Example: Buy Price Adjuster.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	11	BSAD.11	30-32	Wording added and existing wording updated within Part C, section 1. BSAD submission.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	12	BSAD.12	33-34	Wording removed and existing wording updated from Part C, section 2. Re-submission of BSAD section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your response.	No	n/a
BSAD	Official Consultation	13	BSAD.13	All	BSAD Methodology Statement	Do you have any further comments or amendments you would like to see regarding the BSAD statement?	Flexricity	Nothing further	Thank you for your response.	No	n/a

BSAD	Official Consultation	1	BSAD.01	All	General housekeeping updates to version control, contents page, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	2	BSAD.02	All	Legacy references to "ESO", "NGESO" "National Grid" deleted and replaced with "NESO" where applicable.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	3	BSAD.03	All	Legacy references to other conditions under the transmission licence updated to reflect new condition references under the Electricity System Operator Licence i.e. references to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	4	BSAD.04	8-14	Restructuring of the start of the statement: introducing Part A Introduction to contain 2 parts: Foreword section and Purpose of Document section. Existing wording removed, updated and new wording added within new Part A.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	5	BSAD.05	14-15	Part B: Balancing Services Adjustment Data (BSAD) section updated. Existing wording removed, updated and new wording added.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	6	BSAD.06	16-17	Part B, section 2. Balancing Service Adjustment Actions wording updated.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	7	BSAD.07	18-24	Part B, section 2.1 Balancing Services included within Balancing Service Adjustment Actions wording removed and updated.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	8	BSAD.08	25	Wording removed from within Part B, section 3. Buy Price Adjuster (BPA) section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	9	BSAD.09	26-27	Wording removed and updated from within Part B, section 3.1, Buy Price Adjuster and BM Start Up.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	10	BSAD.10	28-29	Wording added and existing wording updated within Part B, section 3.1.2 Worked Example: Buy Price Adjuster.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	11	BSAD.11	30-32	Wording added and existing wording updated within Part C, section 1. BSAD submission.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a

BSAD	Official Consultation	12	BSAD.12	33-34	Wording removed and existing wording updated from Part C, section 2. Re-submission of BSAD section.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your response.	No	n/a
BSAD	Official Consultation	13	BSAD.13	All	BSAD Methodology Statement	Do you have any further comments or amendments you would like to see regarding the BSAD statement?	Zenobe	No further comments.	Thank you for your response.	No	n/a
BPS	Official Consultation	1	BPS.01	All	General housekeeping updates to formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	2	BPS.02	All	Legacy references to "ESO", "NGESO", "NGET" and "National Grid" deleted and replaced with "NESO" where applicable.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	3	BPS.03	All	Legacy References to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	4	BPS.04	4	Wording added regarding development of the BPS statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	5	BPS.05	11	Wording updated within Part B General Principles, section 1 Licence Duties.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	6	BPS.06	12-14	Wording updated within Part B General Principles, section 1 Licence Duties.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	7	BPS.07	16-25	Wording added to Part B and Part C for non-BMUs.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	8	BPS.08	19	Wording added to Part B (c) System and Localised Negative Reserve Active Power Margin.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	9	BPS.09	22	Wording updated for Part B Section (g) communication failure.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	10	BPS.10	27	Wording added to Balancing Principles Part C, section 5 to consider cost changes after instructing a longer notice service.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
BPS	Official Consultation	11	BPS.11	32	Wording updates and added within the Net Transfer Capacity (NTC) description, within Part C, section 10.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a

BPS	Official Consultation	12	BPS.12	35	Wording updated to Part D, section 2.1 Year Ahead, point (i).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
BPS	Official Consultation	13	BPS.13	37	Wording updated to Part D Transmission Constraint Management and Response/Reserve Principles, section 2.2, step 4.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes – suggest revised wording to include specific mention of the 'other balancing services' which fulfil the requirements in 2.2 step 4.		Thank you for your feedback. The range of Balancing Services currently available is extensive, and many are capable of meeting the requirements set out in section 2.2. A full list can be accessed on the NESO website (1) and further information on the Balancing Services NESO procures is set out within the Procurement Guidelines Statement. The Balancing Principles Statement must remain concise, therefore we feel it is best to avoid referencing to specific services within this step. This approach prevents unnecessary constraint should new services be introduced or existing services evolve over time. (1) https://www.neso.energy/industry-information/balancing-services	No	n/a
BPS	Official Consultation	14	BPS.14	39-40	Wording updated relating to MW Dispatch, within Part D, section 2.5.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
BPS	Official Consultation	15	BPS.15	42	Wording added relating to Dynamic Containment, within Part D, section 3.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
BPS	Official Consultation	16	BPS.16	43	Wording updated relating to Regulating Reserve, Part D section 3.2 b).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	We note that in the PGS section 2 that "Balancing Reserve will fulfil the Control Room requirements for synchronised reserve, which is used to manage imbalance between generation and demand in real-time". This contrasts with the BPS under 3.2 b) where it states if there are an insufficient BOA volumes in the BM ancillary service contracts may be put in place for provision of this reserve service. We note also "synchronised" has been dropped. We believe both these statements should align with procuring volumes economically for regulating reserve, and use direct language to describe the benefit of procuring balancing reserve.		Thank you for your feedback. We have updated the PGS section 2 to refer to regulating reserve rather than synchronised reserve. Where there is insufficient BOA volume we may buy Balancing Reserve to fulfil this requirement and so we do not feel there is a conflict here. We also proposed within the official consultation to remove the term synchronised to avoid potential misunderstandings. Previously, it referred to generating units being online, energised, and ready to deliver. However, terms like online or energised can also be interpreted differently. By removing synchronised, we ensure the wording does not imply any discrimination between synchronous and non-synchronous generation technologies.	No	n/a
BPS	Official Consultation	17	BPS.17	43-44	Wording updated and added relating to Balancing Reserve within Part D, section 3.2 (b).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	We welcome the alignment of Balancing Reserve to the 14:00 co-optimised auctions. The current wording states this change is subject to approval from Ofgem in October 2025. Today this approval has since been given. We suggest wording is changed to reflect this is live.		Thank you for your feedback. We acknowledge that the update was not fully reflected in the previous text and have now amended the wording in line with your suggestion.	No	n/a
BPS	Official Consultation	18	BPS.18	45	Wording updated relating to Quick Reserve within Part D, section 3.2 (e).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
BPS	Official Consultation	19	BPS.19	46	Wording updated relating to Slow Reserve Part D, section 3.2 (f).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
BPS	Official Consultation	20	BPS.20	All	Balancing Principles Statement	Do you have any further comments or amendments you would like to see regarding the BPS statement?	Flexricity	Part C, section 4 (vii): "Trades with non BM participants to alleviate constraints where no other viable options exist" – we welcome the inclusion of trades with non-BM participants for this purpose, but we strongly urge NESO to delete "where no other viable options exist". If a non-BM trade can alleviate a constraint economically relative to other options, it should be used.		Thank you for your feedback. To clarify, we consulted on (vii) additional wording in the informal consultation, but this was retracted from the official consultation as proposed wording after further consideration due to the fact this would be captured within Part C, section 4, "(iii) call off of other services which serve to assist us in operating the transmission system". We then set out in section 5 how we would call off these services, and the addition of Part C section 5 (vii) covers the fact that trades taken at longer notice cannot always be directly considered against shorter notice actions due to the potential for costs to change.	No	n/a
BPS	Official Consultation	1	BPS.01	All	General housekeeping updates to formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.		Thank you for your feedback.	No	n/a
BPS	Official Consultation	2	BPS.02	All	Legacy references to "ESO", "NGESO", "NGET" and "National Grid" deleted and replaced with "NESO" where applicable.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.		Thank you for your feedback.	No	n/a
BPS	Official Consultation	3	BPS.03	All	Legacy References to C16 updated to C9 as relevant.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.		Thank you for your feedback.	No	n/a

BPS	Official Consultation	4	BPS.04	4	Wording added regarding development of the BPS statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	5	BPS.05	11	Wording updated within Part B General Principles, section 1 Licence Duties.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	6	BPS.06	12-14	Wording updated within Part B General Principles, section 1 Licence Duties.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	7	BPS.07	16-25	Wording added to Part B and Part C for non-BMUs.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	8	BPS.08	19	Wording added to Part B (c) System and Localised Negative Reserve Active Power Margin.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	9	BPS.09	22	Wording updated for Part B Section (g) communication failure.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	10	BPS.10	27	Wording added to Balancing Principles Part C, section 5 to consider cost changes after instructing a longer notice service.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	11	BPS.11	32	Wording updates and added within the Net Transfer Capacity (NTC) description, within Part C, section 10.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	12	BPS.12	35	Wording updated to Part D, section 2.1 Year Ahead, point (i).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	13	BPS.13	37	Wording updated to Part D Transmission Constraint Management and Response/Reserve Principles, section 2.2, step 4.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	14	BPS.14	39-40	Wording updated relating to MW Dispatch, within Part D, section 2.5.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	15	BPS.15	42	Wording added relating to Dynamic Containment, within Part D, section 3.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	16	BPS.16	43	Wording updated relating to Regulating Reserve, Part D section 3.2 b).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

BPS	Official Consultation	17	BPS.17	43-44	Wording updated and added relating to Balancing Reserve within Part D, section 3.2 (b).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	18	BPS.18	45	Wording updated relating to Quick Reserve within Part D, section 3.2 (e).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	19	BPS.19	46	Wording updated relating to Slow Reserve Part D, section 3.2 (f).	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
BPS	Official Consultation	20	BPS.20	All	Balancing Principles Statement	Do you have any further comments or amendments you would like to see regarding the BPS statement?	Zenobe	There is no guidance on how curtailment within connection offers is managed, notified, or coordinated with generation assets once live. The process for communicating and implementing restrictions should be defined within the Balancing Principles. • In addition, it states: "We shall call off balancing measures defined in 4(i), 4(ii) and 4(iii) in cost order... under certain circumstances however this may not be possible." NESO control room has indicated deviations occur due to replacement energy from re trading, but this is not listed as an exception. Either NESO is not following the Balancing Principles, or the document needs to be updated to reflect actual practice.	Thank you for your feedback. On the first point, the Balancing Principles Statement applies only to live assets, all of which are treated consistently. As such, it does not extend to connection offers. Therefore we are not proposing any further revisions. Regarding the second point, balancing measures are applied in cost order unless operational requirements prevent us from doing so. These operational considerations are already outlined within the BPS and need to be consistent with the prevailing transmission requirements. Additionally there are considerations about storage bids behind constraints, driven by conflict between licence obligations of economic and efficient and observed behaviours which drive increases in replacement energy. We optimise cost over the duration of the constraint and not per settlement period. We are currently undertaking a review of operational policy to determine how to maximise consumer benefit from storage behind constraints. Once this has concluded we will consider any further revisions needed to the Balancing Principles Statement. Therefore we are not proposing any revisions at this moment in time.	No	n/a
All	Official Consultation	n/a	n/a	n/a	n/a	n/a	Field	Field's response to NESO's C9 Statements Annual Review Consultation, February 2026 Field develops, constructs, operates and optimises renewable energy infrastructure designed to lower bills, ensure energy security and promote growth. We are an international company, with our main focus to date on batteries in GB. We have a 500MW/900MWh portfolio of nine assets of varying sizes connecting to both transmission and distribution networks, which are operational, in construction, or preparing for construction, and a 3.5GW development pipeline of large, transmission connected assets in GB alone, alongside a similar pipeline in Spain, Italy and Germany. We welcome the opportunity to respond to NESO's consultation on the annual review of its C9 statements. We do not disagree with the proposed changes, but we consider there are areas where the proposed Balancing Services Statements are not sufficient. In this response we propose three improvements: • Additional clarity on the procurement of stability services, including an overview of how and when NESO will assess system need for such services • A commitment to transparency in procurement processes, with all bids (successful and unsuccessful) published unless there is a compelling reason not to • A defined process by which stakeholders can challenge NESO's approach to procurement of Balancing Services, including in relation to its licence obligations and Balancing Services Statements, and how NESO will treat such challenges. We welcome further engagement with NESO on the points raised.	Thank you for your feedback. Regarding point 1, as communicated through the Stability market, NESO regularly assess its stability requirements and based on these processes determine whether to procure requirements through either the long-term or the mid-term market. Regarding the suggestion for the Balancing Principles Statement, we appreciate this feedback and agree that it warrants further consideration. We are not proposing any changes at this stage as we intend to review the matter more comprehensively. Regarding point 2, please note that NESO does publish bid information. From time to time, information may be published on an aggregate basis in line with C9 obligations and the Procurement Guidelines Statement. The level of detail published for each service NESO procures may vary due to the circumstances of each service and its associated market. Regarding point 3, providers/market participants are able to query NESO's approach to the procurement of balancing services through the established markets/processes for each service. All of the C9 statements include contact provision for any related queries specific to the licence statements contents, for example within the Procurement Guidelines contact details are provided for all queries regarding the provision of Balancing Services we intend to procure, in Part E(2). We also note that NESO frequently facilitates consultation / feedback processes across various services whereby market participants can submit their feedback about how NESO is procuring that service. In relation to individual terms and conditions, where this is related to frequency management, there is also the Article 18 EBR process, which requires industry consultation. For non-frequency management services, NESO always endeavours to engage with industry during contract design processes. NESO will continue to keep under review the transparency of processes and ways in which stakeholders may engage.	No	n/a
PGS	Official Consultation	1	PGS.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	2	PGS.02	5	Wording added regarding development of the PGS statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	3	PGS.03	14	Wording added to Balancing Mechanism Offers and Bid section, within Part B, section 1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	4	PGS.04	15	Wording update of 'Forward Plan' to 'Business Plan', within Part B section 2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a

PGS	Official Consultation	5	PGS.05	20-21	Wording added and updated to Part B, section 3. Taking actions outside the Balancing Mechanism, relating to Forward Trading.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we approve of the additions to part B, section 3 describing Forward Trading, we especially welcome constraint trades as categorised into Voltage, Thermal or RoCoF constraint trades. The description of the use of GTMAs is a welcome transparent addition to this statement. We believe NESO should open a project to make use of GTMA trades with all party types, so that multiple resources can compete with interconnectors and reduce the cost to consumers.	Thank you for your feedback. We have noted your suggestion and have passed this to the relevant team at NESO for consideration.	No	n/a
PGS	Official Consultation	6	PGS.06	21-22	Wording added for Net Transfer Capacity (NTC) section, within Part B, section 3.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we welcome the link provided to reference the GB NTC Calculation Policy.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	7	PGS.07	22-24	Wording added and updated to Part C, section 1 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we agree to the updated wording in Part C. In reference to System Ancillary Services for Large Power stations, we urge NESO to continue work to replace the Mandatory Frequency Response service. This provision under Connection Condition 8.1 of the Grid Code continues to support a mandatory requirement for a service which requires reform to remain compliant, and thus better meet the needs of the energy system through optimising as part of the wider suite of frequency response services. The updated wording in part C of the PGS supports the interim positioning of MFR while options for new service design are assessed.	Thank you for your feedback. In response to the feedback on replacing the Mandatory Frequency Response service, we are currently progressing changes to the Grid Code to enable other means of meeting the mandatory requirement.	No	n/a
PGS	Official Consultation	8	PGS.08	24	Wording updated relating to the Electricity System Restoration Assurance Framework, within Part C, section 1 The Future Requirements for Part 2 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	YES, we agree with updated wording along with the ESR Assurance Framework updated for 2025/26.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	9	PGS.09	25	Wording removed relating to Dynamic Services within Part C, section 1 The Future Requirements for Part 2 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes, we appreciate the transition of Dynamic services to part 2 system ancillary services and to the updated wording expanding into three separate service products (which differ in frequency deviation and Pre/post fault delivery).	Thank you for your feedback.	No	n/a
PGS	Official Consultation	10	PGS.10	27	Wording removed from Constraint Management Services section, within Part C, section 1, relating to changes to loss of mains protection procurement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	11	PGS.11	27-28	Wording for Balancing Reserve is removed from Part C, section 1 within Commercial Ancillary Services list, to section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	No Comment	Thank you for your feedback.	No	n/a
PGS	Official Consultation	12	PGS.12	30-31	Wording added for Balancing Reserve around co-optimising auction timing, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes, we agree with this update and welcome the co-optimised auction. We would like to draw attention to wording - "Balancing Reserve will fulfil the Control Room requirements for synchronised reserve, which is used to manage imbalance between generation and demand in real-time". Is this an accurate statement? The amended Balancing Reserve requirements have only proven accessible to a narrow range of technology types, and since "manag[ing] imbalance between generation and demand in real-time" is a service which can be provided by many technology types, we are alarmed to see Balancing Reserve being given such primacy. This undermines NESO's other efforts to remove barriers to consumer-led flexibility and to improve its own dispatch and scheduling efficiency. Please also see BPS.16	Thank you for your feedback. We have amended this to refer to regulating reserve rather than synchronised reserve. Real-time imbalances are not known in advance and are not predictable in their duration which requires reactive flexible action to resolve. Balancing Reserve has relaxed the dispatch flexibility rules from the historical provision of regulating reserve and looked to optimise these for consumer benefit. We have had multiple technologies participating in the Balancing Reserve market. Energy imbalances known further in advance can be met by other options, for example proactive instructions to less flexible units in the Balancing Mechanism, but that is not the purpose of Balancing Reserve.	Yes	30
PGS	Official Consultation	13	PGS.13	32	Wording updated for Quick Reserve for Non- Balancing Mechanism (Non-BM) participants, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	14	PGS.14	33-34	Existing wording for Super SEL moved within statement from page pp43-44 to within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	We have no objection to the placement under Part C section 2.1 of the wording for the SuperSEL service. We note that the basic concept of SuperSEL - that technical limits can be altered from time to time at a cost - has wider applicability than just to SEL. At present, only SEL is given this treatment, which benefits only plant which post a non-zero SEL. We consider this to be a market distortion. A reasonable solution would be for NESO to acknowledge that other technical parameters should be variable in this way.	Thank you for your feedback and we understand your query. The Super SEL agreements remain as legacy agreements, to provide additional footroom. Currently there is no intention to contract with additional generators as there are other markets (e.g. DFS and negative reserve) that NESO can access footroom if required. However, we do note that other technical parameters could be variable.	No	n/a
PGS	Official Consultation	15	PGS.15	36	Wording added for Static FFR (SFFR) to reflect proposed changes to the service, within Part C, section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	We agree with added wording and support the changes proposed during the A18 EBR consultation. We note that "Reform of the Static service will take place in 2026". Where possible, NESO should provide date estimates for service reform.	Thank you for your feedback. Further details including implementation timelines will be included in the Article 18 submission document to Ofgem. This will be published following the submission to Ofgem, which we expect to submit to Ofgem end of February/early March. Please refer to the Static FFR webpage for more details.	No	n/a

PGS	Official Consultation	16	PGS.16	37-40	Wording removed, updated and added for the Obligatory Reactive Power Services (ORPS) section within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	17	PGS.17	40	Wording added for Constraint management services section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	18	PGS.18	41	Wording updated within Megawatt Dispatch (MWD) section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	19	PGS.19	41-42	Wording updated within Local Constraint Market (LCM) section within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	20	PGS.20	43-44	Wording updated and added for Demand Flexibility Service (DFS), within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	21	PGS.21	44-45	Wording added for Constraints Collaboration Project (CCP) within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes, we agree with the added wording under Part C section 2.1 and welcome the DfC, CMIS services as well as the Boundary Flow Smoothing innovation project into the PGS.		Thank you for your feedback.	No	n/a
PGS	Official Consultation	22	PGS.22	45-46	Wording updated to Stability markets section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	23	PGS.23	47	Wording updated within Part C section 2.2, within Other Reserves – commercial.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	24	PGS.24	47	Wording removed for Dynamic Frequency Response (DFR), within Part C section 2.2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	25	PGS.25	49	Wording updated for Enhanced Reactive Power Service (ERPS), within Part C section 2.2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	26	PGS.26	52	Wording removed from Part C, section 3 Demand Side Providers and Small generators relating to Power Potential Innovation project	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	27	PGS.27	56-57	Updates added to Table 1: BM Trading and System Ancillary Services, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a
PGS	Official Consultation	28	PGS.28	57-60	Updates added to Table 2: Active Commercial Ancillary Services, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flexricity	Yes		Thank you for your feedback.	No	n/a

PGS	Official Consultation	29	PGS.29	62-63	Updates to Table 3 Commercial Ancillary Services under review, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flextricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	30	PGS.30	64	Wording update to Part E General Provisions, section 1 relating to the 2021-2026 regulatory framework.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flextricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	31	PGS.31	69-74	Updates to Table 2: Balancing Services Information Provision Summary, within part E.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Flextricity	Yes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	32	PGS.32	All	Procurement Guidelines Statement	Do you have any further comments or amendments you would like to see regarding the PGS statement?	Flextricity	Whilst we do not object, we note the move of Dynamic Response and Balancing Reserve procurement statement being transitioned to Part 2 System Ancillary Services (commercial services). This is a subtle change, but we take the Part 1 System Ancillary Services to be 'Mandatory' tools for system security versus Part 1 which are 'Commercial' system tools. While we recognise the commercial aspects of these services, this does reflect a change to procurement. Can NESO offer rationale for this change to the statement?	Thank you for your feedback. To clarify, Dynamic Response and Balancing Reserve have never been Mandatory, they are and always will be commercial services. This proposed change is a housekeeping point, there is no further rationale to explain.	No	n/a
PGS	Official Consultation	1	PGS.01	All	General housekeeping updates to version control, formatting, spelling, grammar, contact information and link updates as normal.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	2	PGS.02	5	Wording added regarding development of the PGS statement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	3	PGS.03	14	Wording added to Balancing Mechanism Offers and Bid section, within Part B, section 1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	4	PGS.04	15	Wording update of 'Forward Plan' to 'Business Plan', within Part B section 2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	5	PGS.05	20-21	Wording added and updated to Part B, section 3. Taking actions outside the Balancing Mechanism, relating to Forward Trading.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	6	PGS.06	21-22	Wording added for Net Transfer Capacity (NTC) section, within Part B, section 3.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	7	PGS.07	22-24	Wording added and updated to Part C, section 1 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	8	PGS.08	24	Wording updated relating to the Electricity System Restoration Assurance Framework, within Part C, section 1 The Future Requirements for Part 2 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	9	PGS.09	25	Wording removed relating to Dynamic Services within Part C, section 1 The Future Requirements for Part 2 System Ancillary Services.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

PGS	Official Consultation	10	PGS.10	27	Wording removed from Constraint Management Services section, within Part C, section 1, relating to changes to loss of mains protection procurement.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	11	PGS.11	27-28	Wording for Balancing Reserve is removed from Part C, section 1 within Commercial Ancillary Services list, to section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	12	PGS.12	30-31	Wording added for Balancing Reserve around co-optimising auction timing, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	13	PGS.13	32	Wording updated for Quick Reserve for Non- Balancing Mechanism (Non-BM) participants, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	14	PGS.14	33-34	Existing wording for Super SEL moved within statement from page pp43-44 to within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	15	PGS.15	36	Wording added for Static FFR (SFFR) to reflect proposed changes to the service, within Part C, section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	16	PGS.16	37-40	Wording removed, updated and added for the Obligatory Reactive Power Services (ORPS) section within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	17	PGS.17	40	Wording added for Constraint management services section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	18	PGS.18	41	Wording updated within Megawatt Dispatch (MWD) section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	19	PGS.19	41-42	Wording updated within Local Constraint Market (LCM) section within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	20	PGS.20	43-44	Wording updated and added for Demand Flexibility Service (DFS), within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	21	PGS.21	44-45	Wording added for Constraints Collaboration Project (CCP) within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	22	PGS.22	45-46	Wording updated to Stability markets section, within Part C section 2.1.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a

PGS	Official Consultation	23	PGS.23	47	Wording updated within Part C section 2.2, within Other Reserves – commercial.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	24	PGS.24	47	Wording removed for Dynamic Frequency Response (DFRR), within Part C section 2.2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	25	PGS.25	49	Wording updated for Enhanced Reactive Power Service (ERPS), within Part C section 2.2.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	26	PGS.26	52	Wording removed from Part C, section 3 Demand Side Providers and Small generators relating to Power Potential Innovation project	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	27	PGS.27	56-57	Updates added to Table 1: BM Trading and System Ancillary Services, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	28	PGS.28	57-60	Updates added to Table 2: Active Commercial Ancillary Services, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	29	PGS.29	62-63	Updates to Table 3 Commercial Ancillary Services under review, within Part D.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes.	Thank you for your feedback.	No	n/a
PGS	Official Consultation	30	PGS.30	64	Wording update to Part E General Provisions, section 1 relating to the 2021-2026 regulatory framework.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	It says 'We shall publish information on the Balancing Services that we intend to procure, the outcomes of tender rounds for each service, and the costs and volumes of the services that are procured' which does not appear to be accurate in practice. • Despite multiple requests, while certain tender outcomes are published, the associated costs are not consistently disclosed - for example, stability service tenders do not include cost information. • As a result, the level of transparency is insufficient. The Procurement Guidelines Statement should clearly identify which services include full publication of costs and volumes, which do not, and provide the rationale for any omissions.	Thank you for your feedback. With regards to the Stability Services, please note that NESO has published cost information. Most recently, this has been provided on an aggregate basis in line with C9 obligations and the Procurement Guidelines Statement. The level of detail published for each service NESO procures may vary due to the circumstances of each service and its associated market.	No	n/a
PGS	Official Consultation	31	PGS.31	69-74	Updates to Table 2: Balancing Services Information Provision Summary, within part E.	Do you agree with this proposed change? Please provide your rationale for your response. (Include any concerns, suggestions, or impacts you foresee.)	Zenobe	We are happy with the proposed changes	Thank you for your feedback.	No	n/a
PGS	Official Consultation	32	PGS.32	All	Procurement Guidelines Statement	Do you have any further comments or amendments you would like to see regarding the PGS statement?	Zenobe	Why was "generally" added to the second to last bullet on page 15? NESO should always be publishing their requirements for Commercial Ancillary Services on their website. Not included from informal consultation	On the point raised regarding addition of the wording "generally", whilst NESO should always publish their requirements for Commercial Ancillary Services, there might be a situation whereby if were to do so , it could put the system security at risk, for example an Electricity System Restoration need. Originally having 'generally' included may have been more confusing and therefore upon reflection this was removed in the official consultation. This is also inkeeping with Part A of the statement General Provisions.	No	n/a