

## P245 Assessment Consultation Responses

Consultation issued on 26 November 2009

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
SAIC Ltd. (on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
Scottish and Southern Energy	6/1	Supplier/Generator/ Trader / Party Agent / Distributor
GDF SUEZ Marketing Limited	1/0	Supplier
RWE Npower Limited	8/0	Supplier / Party Agent
British Gas	1/0	Supplier
G4S Utility Services	3/0	NHHDC / NHHDA / MOP
EDF Energy	13/0	Supplier / Generator / Distributor
E.ON UK	5/0	Supplier

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Would the Proposed Modification P245 help to achieve the Applicable BSC Objectives compared to the current arrangements

### Summary

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	Defining timescales in calendar days will add clarity to participating Suppliers' understanding of the periods governing the Long Term Vacant process. It will also improve the accuracy of Settlement by confirming that a site is Long Term Vacant at the earliest available opportunity.
Scottish and Southern Energy	Yes	We believe that the Proposed Modification would help to achieve the BSC Objective (d) by increasing clarity, transparency and simplicity.
GDF SUEZ Marketing Limited	Yes	Allowing Long Term Vacant Sites to be identified earlier and removing any confusion around the timescales involved in the process, will ensure that less consumption is entered incorrectly into settlement. This will help to achieve BSC Objective D (Promoting efficiency in the implementation and administration of the balancing and settlement arrangements).
RWE Npower Limited	Yes	The increase to, and the clarification of, the time-scales around which LTV sites are identified that results from moving from three - seven months to 75 - 215 Calendar Days ensures that sufficient time is allowed for suppliers' internal processes to be employed more effectively and consistently. We believe that BSC Objectives c) and d) are better facilitated as a result.
British Gas	Yes	We agree that the Proposed Modification would help achieve the Applicable BSC Objectives C and D as the change from months to calendar days will add additional clarity, simplicity and transparency.
G4S Utility Services	Yes	The proposed modification would help to achieve objective (d) of the BSC objectives by ensuring more legitimate LTV candidates are included in the process.
EDF Energy	Yes	Improvements to the Long Term Vacant Sites process will better facilitate objective c( see below)than the baseline. We support the Modification Group view that the improvements suggested by the proposed modification will add clarity and transparency and will ensure that the process is made more efficient. Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

Respondent	Response	Rationale
E.ON UK	Yes	BSC Objective D - I believe that this change will improve the clarity of the process by giving a definitive interpretation of the timescales involved in the process and it will simplify the BSC arrangements by providing clear guidance on the start and end of the process. By moving to calendar days, and opening the entry point of the LTVS process to coincide with the optimal reading cycles, sites that may not have qualified – although long term vacant, will now be able to enter the process potentially a reading cycle earlier than previously.

Question 2: Would the Alternative Modification P245 help to achieve the Applicable BSC Objectives compared to the current arrangements?

#### Summary

Yes	No	Neutral/Other
8	0	0

#### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	Defining timescales in calendar days will result in the more accurate capture of Long Term Vacant sites. In addition, amending LTV timescales elsewhere in the documentation will improve clarity and enable future changes to be made via the CP process, which is shorter and simpler than the Modification Consultation process.
Scottish and Southern Energy	Yes	We believe that the Alternate Modification would help to achieve the BSC Objective (d) by increasing clarity, transparency and simplicity.
GDF SUEZ Marketing Limited	Yes	As per question one.
RWE Npower Limited	Yes	As question 1 above.
British Gas	Yes	We agree that the Alternative Modification would help achieve the Applicable BSC Objectives C and D as the change from months to calendar days will add additional clarity, simplicity and transparency as by moving the timescales to the BSCP will enable any future changes to be made more easily.

Respondent	Response	Rationale
G4S Utility Services	Yes	The alternative modification would have the effects of the proposed modification and allow for more flexible change processes in the future, aiding administration and efficiency.
EDF Energy	Yes	Improvements to the Long Term Vacant Sites process will better facilitate objective c than the baseline. We support the Modification Group view that the improvements suggested by the alternative modification will add clarity and transparency and will ensure that the process is made more efficient.
E.ON UK	Yes	BSC Objective D
		– Over and above the benefits of the proposed modification, the alternative offers additional benefits such that the operational activities of this nature that are normally managed through the change process rather than the more expensive and time-consuming modification processes will now be subject to the Change Assessment process designed for operational processes rather than BSC Code obligations. Since the process has now had sufficient time to become embedded in the industry design, and we have had the benefit of the BSC Audit Review Parties can have confidence in the appropriateness of the processes and the level of oversight to feel comfortable in allowing any changes to progress through the industry Change Assessment process.

Question 3: Would the Alternative Modification P245 help to achieve of the Applicable BSC Objectives when compared to the Proposed Modification?

### Summary

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	The Alternative Modification provides a better solution, as it will improve clarity elsewhere in the documentation and enable future changes to be made via the CP process, which is shorter and simpler than the Modification Consultation process.
Scottish and Southern Energy	Yes	Agree with Group's decision that the Alternate Modification would provide additional consistency and clarity. It would remove the need for future Modification Proposal.

Respondent	Response	Rationale
GDF SUEZ Marketing Limited	Yes	The alternative modification clears up inconsistencies in the originally proposed modification. This along with placing the actual Long Term Vacant timescales in a BSC Code Subsidiary Document will increase the efficiency of the process. Removing the need to raise a modification to change the timescales if a future need arises will also help to improve the efficiency of changing the process. Again this will help to achieve BSC objective D (Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.)
RWE Npower Limited	Yes	The alternative would better help to achieve the Applicable BSC Objectives when compared to the Proposed Modification as the draft changes additionally clarify the scenarios around customer submitted reads and how these readings should be interpreted and used and also remove the specific references to the time period from the BSC which will improve the change process going forward should this area of the BSC need to be revisited for any reason.
British Gas	Yes	The Alternative Modification will better help to achieve the Applicable BSC objectives when compared to the Proposed Modification as the Alternative will add additional clarity and simplicity.
G4S Utility Services	Yes	The alternative modification clarifies the timescales of the process more than the proposed modification and simplifies the wording in the BSC.
EDF Energy	Yes	We support the unanimous view of the modification group that the alternative modification provides a greater benefit than the proposed modification as it provides additional clarity on timescales and the migration of these timescales into the BSCP delivers operational efficiencies.
E.ON UK	Yes	Objective C – improves competition by clarifying the timescales involved in the process and resolving the start of the process, this makes the process clearer for parties involved to interpret and by moving to calendar days will hopefully enable users to enter more sites into the process which might not have been possible under the current rules due to reading window cycles Objective D – Improves simplicity and transparency by moving the entire process timelines into days and by allowing the change process to move from the modifications route to the Change Assessment process which is more usual for operational activities.

Question 4: What are the impacts and costs of the P245 Proposed Modification on your organisation?

Please let us know:

whether you use the Long Term Vacant process;  
 how long it would take you to implement changes to your processes or systems; and  
 the costs of those changes.

## Summary

Impacted	Not Impacted	Neutral/Other
5	3	0

## Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Impacted	ScottishPower uses the Long Term Vacants process, and anticipates a small impact to implement changes with associated low costs.
Scottish and Southern Energy	Not impacted	No system or cost impacts.
GDF SUEZ Marketing Limited	Not impacted	The LTV process is used. However implementation of this Modification would only require minor process changes. The cost and time needed to implement this would be negligible.
RWE Npower Limited	Impacted	For those areas of the RWE npower business that are currently employing the solution for dealing with LTV sites that had been developed by the P196 Working Group a range of processes have been developed from the more manual approach to fully embedded system processes. As a result the timescales and costs of implementing the changes established by the P245 Working Group will also vary. Costs are not known at this time, however taking the longest 'lead-time' as an appropriate measure of an implementation time-scale we believe that changes could be made, across all solutions, by the end of February 2010.
British Gas	Impacted	We do use the LTV process We can implement these changes by 24 <sup>th</sup> June Our costs to implement these changes would be minimal.
G4S Utility Services	Not impacted	N/A
EDF Energy	Impacted	We do use the Long Term Vacant process for customers on NELC. At this stage we do not have information on the likely timescales for implementing these changes or the associated costs.
E.ON UK	Minor impact	We currently use the process, the system changes are relatively minor (1 development day), and we could implement the changes in the June 2010 release.

## Question 5: What are the impacts and costs of the P245 Alternative Modification on your organisation?

Please let us know:

whether you use the Long Term Vacant process;

how long it would take you to implement changes to your processes or systems; and  
the costs of those changes.

### Summary

Impacted	Not Impacted	Neutral/Other
5	3	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Impacted	ScottishPower uses the Long Term Vacants process, and anticipates a small impact to implement changes with associated low costs. No additional impact or costs will be incurred by the Alternative Modification as compared to the Proposed Modification.
Scottish and Southern Energy	Not impacted	No system or cost impacts.
GDF SUEZ Marketing Limited	Not impacted	As per question 4.
RWE Npower Limited	Impacted	As question 4 above.
British Gas	Impacted	Same response as question 4.
G4S Utility Services	Not impacted	N/A
EDF Energy	Impacted	We do use the Long Term Vacant process for customers on NELC. At this stage we do not have information on the likely timescales for implementing these changes or the associated costs.
E.ON UK	Minor impact	As question 4

## Question 6: Do you support the implementation option preferred by the Modification Group? The Group's provisional recommended Implementation Date is:

- 24 June 2010 if an Authority decision is received on or before 10 June 2010; or
- 04 November 2010 if an Authority decision is received after 10 June 2010 but on or before 23 October 2010.

Please let us know:

- whether you support the Group's preference for a scheduled Release (i.e. June 2010 Release) over a stand alone implementation (i.e. 10 Working Days after an Authority Decision); and

whether you agree with the proposed implementation timescales.

### Summary

Yes	No	Neutral/Other
6	1	1

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	A scheduled Release is preferable, as it can be implemented in tandem with any other system changes in the relevant Release.
Scottish and Southern Energy	Yes	We agree with the proposed implementation timescales and support the Group's preference for a scheduled release.
GDF SUEZ Marketing Limited	Yes	As there is no major impact internally we have no issue with any of the suggested timescales. It does however make sense to include the modification as part of a scheduled release to allow the change to be more easily managed.
RWE Npower Limited	No	For the reasons outlined in our responses to questions 4 and 5, RWE npower would, on balance, prefer a stand alone implementation date inline with the change 26/02/2010 (stand alone date). In this way we believe that we can address the issue that has been identified with the P196 process at the earliest opportunity.
British Gas	Yes/No	We support the earliest implementation date possible as we can easily make the changes required to meet the proposal
G4S Utility Services	Yes	The use of an implementation date is agreeable as it allows for a definite published date from which the changes will be applied. The timescales suggested are also agreeable.
EDF Energy	Yes	We support the implementation option and would prefer an implementation date of 24/06/10.
E.ON UK	Yes	We prefer the June 2010 release as this can be scheduled with additional changes being implemented at that time.

Question 7: Are there alternative solutions that the Modification Group has not identified, that they should consider?

### Summary

Yes	No	Neutral/Other
0	8	0

## Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	No	-
Scottish and Southern Energy	No	-
GDF SUEZ Marketing Limited	No	No opinion.
RWE Npower Limited	No	-
British Gas	No	-
G4S Utility Services	No	N/A
EDF Energy	No	-
E.ON UK	No	-

Question 8: Do you agree with moving the timing requirements for attempting to obtain Meter readings for sites entering, and staying in, the Long Term Vacant Sites process into a Code Subsidiary Document?

Please see section 2 of Attachment A for the Group's discussion in this area, which include details of the differences in the decision making process for changes to a requirement in a Code Subsidiary Document, verses the Code itself.

### Summary

Yes	No	Neutral/Other
7	0	0

## Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	This will make any future amendments subject to the CP process rather than the Modification Consultation process, which will result in a simpler process and quicker implementation.
Scottish and Southern Energy	Yes	-

Respondent	Response	Rationale
GDF SUEZ Marketing Limited	Yes	Agree with the groups thinking that having the information repeated in the BSC and in BSCP504 is inefficient. Also agree that the timing requirements are a 'how' rather 'what' specification and that they would sit better as part of a BSCP. Further, future changes will be processed through a Change Proposal, rather than a lengthy Modification. This would speed up the any future changes and also bring the timing requirements inline with the rest of the LTV process.
RWE Npower Limited	Yes	Moving the timing requirements better facilitates the systems and process employed and ensures that a certain 'class' of LTV sites will be identified that otherwise may have been missed, due to mismatches between timings of walk orders and process time-scales for example.
British Gas	Yes	We believe the LTV timescales should sit with the BSCP rather the code itself as we believe the BSCP is a more appropriate place for these parameters. This will enable these parameters to be changed more easily should any future review deem this to be necessary.
G4S Utility Services	Yes	The change to the timing requirements are appropriate to achieve the objective of maintaining a site in LTV when on a quarterly read cycle.
EDF Energy	Yes	The migration of the timescales into a BSCP will deliver operational efficiencies.
E.ON UK	Yes	We conducted research that showed that by moving the timescales to calendar days and by opening the reading window cycle to reflect the earliest starting point, we would improve the number of sites being accepted as LTV by 18%. This doesn't mean that the number of sites particularly would increase, it does however mean that we will be able to reflect the vacant situation more accurately within Settlements and that Settlements will be more accurate closer to the time the property moves into this state.

Question 9: Do you think changing the timescales to be referenced in 'calendar days' would help address the BSC Audit issue in this area?

### Summary

Yes	No	Neutral/Other
8	0	0

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	Yes	Defining timescales in calendar days will result in the more accurate capture of Long Term Vacants sites and therefore, more accurate EAC values entering Settlement.
Scottish and Southern Energy	Yes	-
GDF SUEZ Marketing Limited	Yes	As mentioned by the Mod group using the term 'month' as a timescales is open to interpretation, resulting in different parties interpreting the process in multiple ways. We thus strongly support the removal of any reference to a month in the process. We also agree that 'Calendar Days' is the most clear alternative. However we would have no objection to the use of 'Working Days' if this was preferred by other parties. Either of these methods will result in all parties following the same process removing any confusion with regards to the audit.
RWE Npower Limited	Yes	Changing to the measure of Calendar Days instead of months ensures: a consistent approach for those that are utilising the process; and that time-scales are easier to calculate.
British Gas	Yes	Changing the timescale to "calendar days" will allow more genuine LTV sites to be included in the process where they are read on a 3 monthly cycle.
G4S Utility Services	Yes	The use of calendar days would clarify the values that are to be used and should therefore help to clear the BSC Audit issue.
EDF Energy	Yes	The ambiguity associated with the current arrangements will be removed and therefore the Audit issues will have been rectified.
E.ON UK	Yes	Due to the unequal length of calendar months – it requires the time period to be recalculated each month to determine whether sites can be entered into the process. By moving to days we have certainty about the start date, irrespective of whether the month has 28 or 31 days.

## Question 10: Do you have any further comments on P245?

### Responses

Respondent	Response	Rationale
SAIC Ltd. (on behalf of ScottishPower)	No	-
Scottish and Southern Energy	No	-

Respondent	Response	Rationale
GDF SUEZ Marketing Limited	No	-
RWE Npower Limited	No	All points covered in replies to the questions above.
British Gas	No	-
G4S Utility Services	No	N/A
EDF Energy	No	-
E.ON UK	No	-