

## P255 Consultation Responses

Consultation issued on 16 April 2010

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Scottish and Southern Energy	9/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator
TMA Data Management Ltd	0/1	NHHDC, NHHDA, HHDC and HHDA
Accenture (UK) Ltd. (for and on behalf of ScottishPower)	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
RWE Npower Limited	8/0	Supplier/Party Agent
EDF Energy	13/0	Supplier/Generator/Trader/Consolidator/Exemptible Generator/Party Agent/Distributors
E.ON	5/0	Supplier

Question 1: Would P255 help to achieve the Applicable BSC Objectives?

### Summary

Yes	No	Neutral/Other
6	0	0

### Responses

Respondent	Response	Rationale
Scottish and Southern Energy	Yes	It allows for the efficient provision of the profile administration service, as such it would better facilitate the achievement of the applicable BSC objective d. It also indirectly satisfy BSC objective c by reducing cost

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Respondent	Response	Rationale
		to suppliers which enables them to pass on the benefit to their customers hence promoting competition.
TMA Data Management Ltd	Yes	P255 would better facilitate Applicable BSC Objective d by allowing more flexibility in the delivery of the PrA service, and enabling a wider range of respondents to the procurement process to ensure the most cost effective and efficient solution can be chosen.
Accenture (UK) Ltd. (for and on behalf of ScottishPower)	Yes	We believe that the Proposed Modification will allow the PrA service to be delivered in a more flexible and cost effective way. Splitting out the data collection element should increase the number of organisations who may express an interest in running the service. The data analysis element could be viewed as an obstacle to those interested companies, who would view the requirement for specialised knowledge and skills as a cost they were not willing to bear. This would therefore have a beneficial impact on Objective d.
RWE Npower Limited	Yes	We agree that removing the constraints that prevent Elexon from ensuring the efficient provision of the PrA Service would be a benefit the Industry and also possible cost savings by bringing the data analysis role in house.
EDF Energy	Yes	EDF Energy believes that this proposal would better meet the applicable BSC objective (d) on the basis that it will improve the efficiency and administration of the balancing and settlement arrangements by providing Elexon and the Panel flexibility in discharging the PrA service.  Notwithstanding the above, it is essential that there are appropriate checks and balances to ensure that all parts of the service are performed in the most efficient and cost effective manner. With this in mind we support the increased transparency of the costs that should arise from the implementation of this proposal and the process of Elexon developing an appropriate robust business case which would need to be agreed by the Elexon Board and the Panel.
E.ON	Yes	Applicable Objective D – on the basis that the service is procured from central costs and if as stated in the proposal Elexon can deliver the service at a reduced cost this will feed through to costs picked up by BSC parties.  Providing that the Panel and the Authority are able to satisfy themselves on parties behalves that the costs are a reduction on those that would be incurred benchmarked against a competitive tender approach.

Question 2: Do you support the implementation approach described in the consultation document?

**Summary**

Yes	No	Neutral/Other
6	0	0

**Responses**

Respondent	Response	Rationale
Scottish and Southern Energy	Yes	The authority's decision needs to be in place in time for the procurement process to commence.
TMA Data Management Ltd	Yes	The only way to get any benefit from P255 is for the Authority's Decision to be provided in time to allow the procurement process to start with P255 in place.
Accenture (UK) Ltd. (for and on behalf of ScottishPower)	Yes	It makes sense for the implementation to be as quick as possible after an Authority decision to allow the maximum time for a competitive procurement exercise to take place.
RWE Npower Limited	Yes	-
EDF Energy	Yes	The implementation approach appears appropriate given the interaction with the forthcoming PrA procurement exercise.
E.ON	Yes	reduction in future costs

Question 3: Are there alternative solutions that the Modification Group has not identified, that it should consider?

**Summary**

Yes	No	Neutral/Other
1	5	0

**Responses**

Respondent	Response	Rationale
Scottish and Southern Energy	n/a	
TMA Data Management Ltd	No	n/a
Accenture (UK)	No	-

Respondent	Response	Rationale
Ltd. (for and on behalf of ScottishPower)		
RWE Npower Limited	No	-
EDF Energy	No	-
E.ON	No	-

## Question 4: Do you have any further comments on P255?

### Responses

Respondent	Rationale
Scottish and Southern Energy	No
TMA Data Management Ltd	No
Accenture (UK) Ltd. (for and on behalf of ScottishPower)	<p>The P223 Profile Administration process has many similarities to the requirements within P255 so any changes that are going to be placed on the Supplier must take into account the existing process for P223 to ensure there is no duplication.</p> <p>Also, there must be specific distinctions drawn on the MPAN samples that will be used for each process. At the moment P255 does not reference P223 at any point so this must be included to ensure process separation and understanding.</p>
RWE Npower Limited	No
EDF Energy	No
E.ON	No