

Stage 03: Assessment Procedure Consultation Responses

P298 'Consequential amendments to the BSC Modification process following the implementation of Third package and other miscellaneous changes''

This Assessment Procedure Consultation was issued on 6 February 2014, with responses invited by 27 February 2014.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON	5/0	Supplier / Generator / Trader / Consolidator / Exemptable Generator
RWE Npower	10/0	Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent
ScottishPower Energy Management Ltd	5/0	BP, TG, EN, MV, TG, TI, TS

Question 1: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to allowing the Authority to raise, or direct National Grid to raise, Modifications that it considers necessary to comply with, or implement, European Electricity Regulation and legally binding decisions? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	v0.10 of the legal text appears appropriate.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	The draft legal text introduces an appropriate mechanism to allow the Authority or the Company to introduce Modifications to reflect changes to European Electricity Regulations or legally binding decisions.

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to acceptance of such Modifications into the process? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	It seems quite clear on this.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	We agree that the draft legal text introduces an appropriate mechanism to allow the BSC Panel to accept into the modification process Modifications raised to reflect changes to European Electricity Regulations or legally binding decisions.

Question 3: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to the progression of such Modifications in accordance with the Authority's timetable? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	2.1.10A (d) makes this clear; in order to allow effective development and consultation we presume that the Authority would not restrict the timescales for any stage unless absolutely necessary to meet relevant EC or Agency deadlines.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	We agree that the draft legal text introduces an appropriate mechanism to allow the BSC Panel to progress such Modifications in accordance with the Authority's timetable.

Question 4: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to preventing the withdrawal of such Modifications without the prior consent of the Authority? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	Again this seems clear.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	The draft legal text appears to deliver the intention of the proposed P298 solution in respect of preventing the withdrawal of such Modifications without the Authority's consent.

Question 5: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to reflecting that any Authority conclusion or direction may not fetter the views of the relevant Workgroup, the voting rights of the Panel or the recommendation of the Modification Report in respect of such Modification? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	Although this should be a given it is helpful to have this spelt out in F 2.1.10A (e).
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	The draft legal text appears to deliver the intention of the proposed P298 solution in not fettering the voting rights of the Panel in respect of such Modifications.

Question 6: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of the P298 proposed solution in respects to preventing the amalgamations of such Modifications without the prior consent of the Authority? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	Again the legal text seems to accomplish this.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	The draft legal text appears to deliver the intention of the proposed P298 solution in preventing the amalgamation of such Modifications without the Authority's consent.

Question 7: Are there any Alternative Solutions that the P298 Workgroup should consider? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
E.ON	No	-
RWE Npower	No	-
ScottishPower Energy Management Ltd	No	-

Question 8: Please indicate the impacts of the Proposed Solution on your organisation, in particular any perceived lead times and costs. *Please provide details.*

Responses

Respondent	Response
E.ON	We foresee no particular impacts other than e.g. more intensive involvement from future Workgroup members, should modifications arise with tight timescales.
RWE Npower	-
ScottishPower Energy Management Ltd	The Proposed Solution should have a minimal impact on our organisation

Question 9: Do you agree with the Workgroup's recommended Implementation approach? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	The usual 10 WD is appropriate.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	We agree that there is no reason to delay implementation of this Modification beyond usual implementation timescales.

Question 10: Do you agree with the Workgroup's initial unanimous view that P298 better facilitates the Applicable BSC Objectives than the current baseline and should be approved? *Please provide rationale.*

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	We agree with the Workgroup's conclusions that P298 will further Objectives a, d, and e by clarifying the use of existing processes for processing and implementation of modifications required for EU compliance.
RWE Npower	Yes	-
ScottishPower Energy Management Ltd	Yes	<p>P298 better facilitates Applicable Objective (a) as it clarifies the conditions under which the Authority can direct the Transmission licensee to raise Modifications arising from the Electricity Regulation.</p> <p>P298 better facilitates Applicable Objective (d) as it provides clarity on the processes to be followed with such Modifications thus improving efficiency.</p> <p>P298 better facilitates Applicable BSC Objective (e), Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency.</p> <p>It is neutral against the other Applicable Objectives.</p>

Question 11: Do you have any further comments on P298?

Summary

Yes	No
0	3

Responses

Respondent	Response	Comments
E.ON	No	-
RWE Npower	No	-
ScottishPower Energy Management Ltd	No	-