

Report Phase Consultation Responses

P317 'Changes to the Unmetered Supplies obligations in the BSC'



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

This Report Phase Consultation was issued on 20 February 2015, with responses invited by 13 March 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Power Data Associates Ltd	0/1	Supplier Agent (Meter Administrator)
Northern Powergrid	1/0	Distributor
Electricity North West Ltd	1/0	Distributor
ScottishPower	2/0	Distributor
EDF Energy	9/0	Generator, Supplier
SSE plc	6/0	Generator, Supplier, Interconnector User

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P317 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Objective (d) it removes ambiguity from the BSC and for Parties and Supplier Agents involved in the unmetered arrangements.
Northern Powergrid	Yes	None provided.
Electricity North West Ltd	Yes	P317 will remove outdated text from Section S (paragraphs 8.2.7 to 8.2.10 inclusive) of the BSC to ensure the LDSO and MA obligations are clearly reflected, promoting efficiency in the implementation of the balancing & settlement arrangements which will better facilitate Objective (d) of the Applicable BSC Objectives.
ScottishPower	Yes	Scottish Power agrees with the Panel's recommendation that P317 should be approved. We believe that this is a housekeeping issue and will have no impact on the actual process.
EDF Energy	No	Insufficient information is provided in the modification report to establish whether there is benefit in removing the BSC paragraphs referred to, as proposed. These paragraphs provide what seem reasonable obligations on DNOs to provide information on request from the Panel or suppliers, and updates on Unmetered Supplies. Obligations contained in BSC Procedures do not carry weight unless they can be referenced to an obligation in the BSC itself. It is not clear what the impact on BSC Objectives would be, or what the materiality, if any, could be, and on balance there seems little to be gained by making the change.
SSE plc	Yes	Removal of outdated and redundant text from the Code better facilitates objective d) by removing any potential for ambiguity, improving efficiency in the administration of the Trading Arrangements. Whilst SSE do not accept per se that Code text should always be aligned to fit working practice (in certain circumstances the opposite may be true), in this

Respondent	Response	Rationale
		specific case we agree that it is warranted and provides a more efficient outcome.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P317?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	None provided.
Northern Powergrid	Yes	None provided.
Electricity North West Ltd	Yes	The redlined changes deliver the intention of P317 by removing the outdated text.
ScottishPower	Yes	We believe that the proposed relined changes deliver the intention of P317
EDF Energy	Yes	Given that the intention seems to be to reduce the force of obligation on DNOs, the removal of such obligations under the BSC supports this.
SSE plc	Yes	None provided.

Question 3: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
5	0	1	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	None provided.
Northern Powergrid	Yes	None provided.
Electricity North West Ltd	Yes	As P317 is only removing outdated text from the BSC and there are no system or participant impacts the implementation date of 25 June 2015 seems reasonable.
ScottishPower	Yes	Scottish Power agree with the recommended implementation date
EDF Energy	Yes/No	None provided.
SSE plc	Yes	None provided.

Question 4: Do you agree with the Panel's initial view that P317 should be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
5	0	1	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	None provided.
Northern Powergrid	Yes	None provided.
Electricity North West Ltd	Yes	As P317 will only be removing outdated text it fulfils the Self-Governance Criteria as its implementation will not have a material effect, neither will it discriminate between different classes of Parties. Consequently, it is appropriate that it be treated as a Self-Governance Modification.
ScottishPower	Yes	Scottish Power believes that Modification 317 fulfils the Self-Governance criteria and that it should be progressed as such.
EDF Energy	Yes/No	There is insufficient information on the full impact of removing the obligations on DNOs to answer this question.
SSE plc	Yes	The modification is a self-evident improvement in efficiency to the benefit of all Parties; there are no competitive impacts associated with the change; and therefore it is appropriate for the Panel self-determine the final decision on this proposed change.

Question 5: Will P317 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	3	1	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	It will remove the current conflicting obligations within the BSC & Code Subsidiary documents.
Northern Powergrid	Yes	None provided.
Electricity North West Ltd	No	There is no direct impact on our systems/processes, but P317 provides clarity around the obligations of LDSO's and MA's.
ScottishPower	No	This change is a purely housekeeping change and will present no change to Scottish Power.
EDF Energy	Yes/No	It is not clear how removal of the obligations will affect the provision of data in future.
SSE	No	None provided.

Question 6: Will your organisation incur any costs in implementing P317?

Summary

Yes	No	Neutral/No Comment	Other
0	5	1	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	No	None provided.
Northern Powergrid	No	None provided.
Electricity North West Ltd	No	None provided.
ScottishPower	No	There will be no impact on Scottish Power in the implementation of this Modification, we are already working to the new regime and have updated internal documentation to reflect current obligations.
EDF Energy	Yes/No	It is not clear how removal of the obligations will affect data quality in future.
SSE plc	No	None provided.

Question 7: Do you have any further comments on P317?

Summary

Yes	No
1	5

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	No	n/a
Northern Powergrid	No	n/a
Electricity North West Ltd	No	n/a
ScottishPower	Yes	We believe that this Modification will ensure that the current text reflects the updated process and ensure that there is clarity in relation to the current obligations.
EDF Energy	No	n/a
SSE plc	No	n/a