

Report Phase Consultation Responses

P321 'Publication of Trading Unit Delivery Mode'

This Report Phase Consultation was issued on 10 September 2015, with responses invited by 29 September 2015.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SmartestEnergy	1 / 0	Supplier
E.ON UK Plc	1 / 0	Generator, Supplier, Non Physical Trader
Drax Power Limited	1 / 0	Generator
Everis Consultancy Ltd on behalf of ScottishPower Group	8 / 0	Generator, Distributor, Non Physical Trader, ECVNA, MVRNA

P321
Report Phase Consultation
Responses

30 September 2015

Version 1.0

Page 1 of 7

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P321 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
E.ON UK Plc	Yes	We agree that P321 increases data transparency hence better facilitate competition than the baseline, same view as the proposer, other working group members and the panel.
Drax Power Limited	Yes	The P321 proposal meets Applicable BSC Objectives (ABO) (b) and (c) for the reasons stated in the workgroup report. Drax also believes that P321 may assist in the identification of possible constraints on the system and will help to explain National Grid's balancing actions. The improved clarity behind the decision making made by National Grid will allow market participants to make better informed judgements in pricing, therefore it will facilitate efficient price formation and thus will further ABO (c). Further, P321 will allow market participants to: see the challenges faced by the SO in terms of increase embedded generation; understand the volatility behind BSUoS; and gain better quality information on the generation mix in the market beyond traditional transmission connected assets. Ultimately, ABOs (b) and (c) will be better facilitated.
Everis Consultancy Ltd on behalf of ScottishPower Group	Yes	<p>We agree with the workgroups views on the applicable Objectives. This modification will better achieve Objectives B and C.</p> <p>On Objective B, we agree that the publication of this data could have a beneficial impact on system management IF new build generation is able to use this information to make decisions (e.g. around construction or operational patterns) which lead to a more efficient operation or a better financial case for investment.</p> <p>On Objective C, again we agree that this information will allow customers to make a better informed decision when it comes to the type of</p>

Respondent	Response	Rationale
		<p>contract they make with their Supplier. It will level the playing field for all customers in this situation, where some may be receiving this data already from Suppliers, while others are not able to, for whatever reason. Our only minor concern is that by mandating the provision of this data we are denying Suppliers an opportunity to provide a differentiating service, stifling a potential competitive advantage.</p> <p>Overall we feel that the benefits outweigh any potential dis-benefits and that the arguments under C by far outweigh the arguments under B</p>

Question 2: Do you agree with the Panel's initial unanimous view that P321 should be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
E.ON UK Plc	Yes	Yes because we believe P321 has no material impact on participants. The additional information disclosed is to correct the misleading message given to the customers. In addition given that it is at a Grid Supply Point group level it should not cause debate on the commercial sensitivity of each individual Grid Supply Point.
Drax Power Limited	Yes	There are no material impacts on participants or competition and as such Drax believes the Self-Governance criteria to have been met.
Everis Consultancy Ltd on behalf of ScottishPower Group	Yes	-

Question 3: Do you agree with the Panel that the redlined changes to the BSC and CSDs deliver the intention of P321?

Summary

Yes	No	Neutral/No Comment	Other
2	0	2	0

Responses

Respondent	Response	Rationale
SmartestEnergy	No comment	-
E.ON UK Plc	No comment	Can't comment on this due to insufficient technical knowledge.
Drax Power Limited	Yes	This seems sensible.
Everis Consultancy Ltd on behalf of ScottishPower Group	Yes	-

Question 4: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
E.ON UK Plc	Yes	Yes, given that the information is already available and only requires some system work to make it published on the BMRS website the scope of work shouldn't be too wide. Hence the proposed implementation date of 30 June 2016 should be achievable.
Drax Power Limited	Yes	This seems sensible.
Everis Consultancy Ltd on behalf of ScottishPower Group	Yes	-

Question 5: Do you have any further comments on P321?

Summary

Yes	No
1	3

Responses

Respondent	Response	Comments
SmartestEnergy	No	-
E.ON UK Plc	No	-
Drax Power Limited	Yes	<p>We support the workgroup decision that a map of Great Britain that will show GSP Group boundaries in relation to key landmarks such as cities should be made. This will provide clarity to customers and industry parties.</p> <p>While Drax initially supported the solution to include individual Grid Supply Points (GSPs) and believes the solution has merit under the Applicable BSC Objectives, we appreciate the workgroup's analysis presented in the Report Phase Consultation document. Drax agrees with the workgroup's view that a solution to include individual GSPs may be too complex to develop under P321 and should be properly assessed in a separate modification when necessary.</p>
Everis Consultancy Ltd on behalf of ScottishPower Group	No	-