

Assessment Procedure Consultation Responses

P324 'Review of BSCCo's governance: introducing improved accountability to BSC Parties'

This Assessment Procedure Consultation was issued on 24 May 2016, with responses invited by 15 June 2016.



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
Drax	1 / 0	Generator
British Gas	1 / 0	Supplier
ScottishPower	6 / 0	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent
National Grid Electricity Transmission plc	1 / 0	Transmission Company
First Utility	1 / 0	Supplier
SSE plc	6 / 0	Generator, Supplier, Interconnector User
RWE npower plc	8 / 0	Generator, Supplier, Non Physical Trader

P324
Assessment Consultation
Responses

20 June 2016

Version 2.0

Page 1 of 24

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Question 1: Do you believe that P324 would better facilitate the Applicable BSC Objectives compared to the current baseline and so should be approved?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
Drax	Yes	<p>We believe that both the P324 Original and Alternative will promote efficiencies in the implementation and administration of the BSC thereby better facilitate the Applicable BSC Objective (ABO) (d). The ability to remove BSCCo Board members will improve Board accountability to funding parties and allow parties to have more of an active role in determining the management of Elexon.</p> <p>The increased clarity of the roles of the BSC Panel and BSCCo Board introduced under the proposal, particularly with respect to the BSCCo Strategy, will further improve the efficiency in implementation of the BSC arrangements.</p>
British Gas	Yes	<p>We agree with the workgroup and believe that Applicable Objective 'D' will be better facilitated through P324. Introducing arrangements so that the Board are accountable to the industry will lead to more efficient arrangements. It will also allow BSC Parties to raise any resolutions (binding or non-binding), to change director positions or strategy.</p> <p>We believe that giving the board the discretion to remunerate any Non-Executive Directors will increase the talent pool leading to a more efficient running of the BSC. Introducing accountability in the positions without remuneration could make the position unattractive, further reducing the number of applicants leading to an inappropriate appointment or no appointment making the BSC less efficient.</p> <p>Heidrick and Struggles noted in the previous recruitment campaign for a Non-Executive director that potential applicants were unable to fulfil the role due to commitments to their employer. We</p>

Respondent	Response	Rationale
		believe that remuneration will increase the talent pool, improving competition for the positions and allowing the Board to appoint the correct candidate for the role. This will lead to a more efficient running of the BSCCo.
ScottishPower	Yes	<p>P324 would overall better meet the Applicable BSC Objectives.</p> <p>By clarifying the roles of the Board, the BSC Panel and BSCCo and increasing the accountability of the Board to BSC Parties, P324 would improve the efficiency in implementing the BSC arrangements better facilitating Objective (d). The proposal is neutral against the other Objectives</p>
National Grid Electricity Transmission plc	Yes	We believe that P324 would better facilitate Applicable BSC Objective (d) as it would improve accountability of the Board to the industry by allowing BSC Parties a means of removing Directors and of raising non-binding resolutions. In addition, P324 would add clarity to the roles of the Board and the Panel which would further improve efficiency in the balancing and settlement arrangements.
First Utility	Yes	P324 would facilitate BSC Objective (d) by improving the efficiency of industry arrangements by enabling BSC Parties to have a more active role in how the BSCCo is managed.
SSE plc	Yes	SSE believes that P324 would better facilitate objective (d), by clarifying the role of the Board (distinct to the role of the Panel), and increasing the accountability of the Board to BSC Parties. Whilst recognising the complexities introduced by voting arrangements, BSC Parties ultimately are obliged to fund the operations of BSCCo - therefore an improvement in accountability to those who are financially liable, will on balance improve the efficiency in the administration of the BSC.
RWE npower plc	Yes	RWE npower believes that P324 does facilitate BSC Objective D and we agree with the proposer that P324 would improve the accountability of the Board to the industry, which would improve efficiency in the arrangements. We also agree that P324 would allow BSC Parties a more active role in determining the management of BSCCo, by providing a means to remove Directors in whom they do not have confidence. For these reasons we believe that P324 should be approved.

Question 2: Do you believe that the potential Alternative Modification would better facilitate the Applicable BSC Objectives compared to the Proposed Modification and so should be raised?

Summary

Yes	No	Neutral/No Comment	Other
3	4	0	1

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
Drax	Yes	<p>We believe that the potential Alternative Modification would better facilitate ABO (d) compared to the Proposed Modification.</p> <p>We believe that it is better not to remunerate industry non-executive Directors. The current method of not paying these Board members is working well and therefore see it as inefficient to remunerate. In addition, we would rather have members on the Board that are drawn to the position through reasons other than financial gain. We believe this has worked well and to date the BSCCo has had competent board members.</p>
British Gas	No	We believe that both the Proposed and Alternative will improve applicable objective 'D' by improving efficiency through introducing accountability to the BSC Parties. We believe the proposed will improve the baseline more than the alternative as remuneration will increase the talent pool for Board positions.
ScottishPower	No	Based on the findings in Appendix 2, it would appear that the lack of remuneration for 'industry' non-executive directors may affect potential candidates' willingness to apply for Board positions and may give the perception that the role is less worthwhile than a position which is remunerated.
National Grid Electricity Transmission plc	No	We recognise that the potential Alternative Modification would better facilitate the objectives when compared to the BSC baseline, however we are not certain that it better facilitates the objectives when compared to the Proposed Modification. We await the consultation responses to review wider industry views on the matters discussed by the Workgroup.

Respondent	Response	Rationale
First Utility	Yes	We agree with the working group's majority view that the potential Alternative Modification would better facilitate BSC Objective (d) due to cost savings and the good representation of 'industry' non-executive Directors to date.
SSE plc	-	<p>SSE remain concerned about the unintended consequences of remunerating industry directors as set out in our response to BSC Modification P303 consultation, and that remuneration of industry members serving the Board may result in a subsequent call from Committee members to be paid for their time and effort or indeed stop volunteering their time, which would be to the detriment of the arrangements were it to happen.</p> <p>However, we note the evidence presented in Appendix 2 appears to demonstrate that lack of remuneration is an important factor in limiting the potential candidates that would be prepared to serve on the Board.</p> <p>Notwithstanding the above, we note that the Authority rejected the proposed remuneration of industry directors in P303, citing that that the case for remuneration had not been sufficiently demonstrated. Whilst Appendix 2 would appear to fulfil this evidential requirement, we would not want the other elements of the proposal to be rejected in the circumstance that the Authority disagrees.</p> <p>SSE therefore believe that an alternative modification should still proceed to decision stage, to allow the Authority an option to effect change without remuneration of industry Board members, if it believed this remained the optimum solution.</p>
RWE npower plc	No	RWE npower believes that the Proposed Modification rather than the potential Alternative solution would better facilitate BSC Objective D. The research conducted shows that a lack of remuneration does have an impact on the size of the pool of credible candidates. Therefore, allowing 'industry' Non-Executive Directors to be remunerated would widen the talent pool, which will increase efficiency in finding and appointing the best candidate to ensure the most efficient and effective leadership of BSCCo. This would follow the recommendation expressed in the Knight report for Board members to be remunerated and reflect other industry Boards such as Gemserv and Xoserve, where Non-Executive Directors are also

Respondent	Response	Rationale
		remunerated. However, we do believe that necessary caps and controls should be put in place when remunerating Non-Executive Directors on the Board.

Question 3: Do you believe that the draft legal text delivers the intention of P324?

Summary

Yes	No	Neutral/No Comment	Other
6	0	2	0

Responses

Respondent	Response	Rationale
SmartestEnergy	No comment	-
Drax	Yes	The proposed text seems sensible.
British Gas	Yes	Please however note our response to Question 8.
ScottishPower	Yes	-
National Grid Electricity Transmission plc	Yes	-
First Utility	No comment	-
SSE plc	Yes	Should a general obligation be inserted to review fixed parameters from time to time as the market evolves? This will ensure that fixed numbers/percentages remain appropriate in providing the balance of participation of voting parties intended by the currently drafted provisions.
RWE npower plc	Yes	RWE npower supports the draft legal text provided, which does deliver the intention of P324. More importantly, any changes are restricted to Board governance and do not go beyond the intention of P324 into Panel governance, particularly in relation to parties ability to remove the Panel Chairman from the Board via a binding resolution.

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

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
Drax	Yes	This seems sensible.
British Gas	Yes	We believe the 03/11/16 or 10 WDs after the Authority decision is made after 20/10/16 is sensible.
ScottishPower	Yes	As the proposed changes have no impact on BSC systems it would be appropriate to coordinate P324 implementation with the November 2016 BSC Systems Release.
National Grid Electricity Transmission plc	Yes	We note the issues highlighted in section 5 of the consultation document in relation to the November 2016 release, however as P324 does not include any known BSC systems changes, the recommended Implementation Date seems reasonable.
First Utility	Yes	We are not aware of other benefits to alternative dates.
SSE plc	Yes	-
RWE npower plc	Yes	RWE npower agrees with the recommended implementation date provided that a more defined process and clear criteria concerning the remuneration of Non-Executive Directors can be established with the necessary caps and controls within the specified timescale. This way BSC parties who have a funding share can be confident can take comfort that any remuneration is reasonable.

Question 5: Do you agree with the principle of having both a minimum number of Voting Parties vote and a minimum percentage of the total votes cast as thresholds to achieve a quorum?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
Drax	Yes	This is a rational notion as it addresses the risk of decisions being made by a single party or small minority of shareholders.
British Gas	Yes	We believe that having both a percentage and voting party numbers will ensure there is a fair representation across the industry to vote on the matter.
ScottishPower	Yes	Requiring both a minimum number of Voting Parties and a minimum percentage of votes cast ensures a greater diversity of Voting Parties must participate to achieve a quorum and ensures that resolutions cannot be passed without engaging a reasonable proportion of those eligible to vote.
National Grid Electricity Transmission plc	Yes	In principle, this seems reasonable to both avoid domination of the voting by a small group of large parties and to encourage engagement in the process by a larger group of parties.
First Utility	Yes	As per the consultation, this approach would help prevent larger parties from comprising a quorum on their own, while ensuring there is a reasonable chance of achieving a quorum even if several of the larger parties did not participate.
SSE plc	Yes	Requiring both criteria to be met provides a sensible balance between larger parties and smaller parties, and ensures that resolutions cannot be forced through without a reasonable mix of voters. This should in turn encourage a greater spectrum of views when considering the issue to be voted upon.
RWE npower plc	Yes	RWE npower agrees with the principle of having both a minimum number of Voting Parties and a minimum percentage of the total votes cast as thresholds to achieve quorum. Having both will

Respondent	Response	Rationale
		<p>address the risk of decisions being made by a very small minority (or even a single) shareholder and the risk of quorum not being achieved by the lack of participation of larger parties. Therefore, we agree with the workgroup's reasoning that at least 10 Voting Parties must vote, which would prevent the biggest six Parties from comprising a quorum on their own, whilst the 30% threshold should also ensure that a quorum can be achieved even if several of the larger Parties do not participate.</p>

Question 6: Do you agree with the proposed thresholds of 10 Voting Parties representing at least 30% of the total number of votes?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	This strikes the right balance in a number of different scenarios. In practice this would mean that if 6 of the Big 6 turned up they could not pass a resolution without another 3 smaller parties and NGT present. The 30% rule would also mean in practice that at least 3 of the Big 6 would have to turn up every time and in this event there would have to be at least 6 smaller parties and NGT.
Drax	Yes	We agree that the 30% threshold is reasonable. The workgroup has considered a quorum threshold of 50% and we agree that this is too high as the 'Big 6' could effectively abstain their votes if they disagree with a proposal in order for it to not reach quorum. In this regard we consider a 30% threshold to be appropriate. We consider that a <i>minimum</i> of 10 voting parties should cast a vote. This approach will ensure a level of diversity in those parties who cast a vote.
British Gas	Yes	-
ScottishPower	Yes	The thresholds proposed should deliver the objectives outlined in our response to question 5.
National Grid Electricity Transmission plc	Yes	We note the discussions of the workgroup in this area, as set out in the consultation document and consider that these thresholds appear reasonable.
First Utility	Yes	Please see our response above to Question 5.
SSE plc	Yes	SSE agrees that this seems to provide a reasonable balance, based on current level of participation in the BSC and current market shares. There should remain an obligation to review thresholds from time to time to ensure that they remain appropriate as the market evolves.
RWE npower plc	Yes	RWE npower agrees with the proposed thresholds of 10 Voting Parties representing at least 30% of

Respondent	Response	Rationale
		<p>the total number of votes. We also agree with the workgroup’s reasoning for the thresholds set. The threshold for 10 voting parties will provide a decent level of diversity in who votes. We also believe that the 30% threshold is reasonable and will prevent the biggest six Parties from comprising a quorum on their own and a quorum can still be achieved without a number of them participating.</p>

Question 7: Do you believe that the current requirement for there being at least two 'non-industry' non-executive Directors on the Board should remain unchanged?

Summary

Yes	No	Neutral/No Comment	Other
6	0	2	0

Responses

Respondent	Response	Rationale
SmartestEnergy	No comment	-
Drax	Yes	The current requirement is working well and we see no reason to change this. Ensuring two 'non-industry' non-executive Directors are on the Board ensures a good level of perspective that is not necessarily acquired from within the industry.
British Gas	Yes	Yes we believe that a greater diversity in experience and knowledge are important for the Board to have.
ScottishPower	Yes	Requiring at least two 'non-industry' non-executive directors on the Board facilitates the introduction of ideas and a perspective from outside the industry.
National Grid Electricity Transmission plc	Yes	Unless concerns are expressed by consultation respondents, we see no reason to change these arrangements at the current time.
First Utility	Yes	The case for an alternative approach has not been raised.
SSE plc	Neutral	There is no evidence to suggest that this isn't working well at the moment, and it is important that BSCCo in providing a market operations service remain in touch at Board level with the needs of those exposed to the market arrangements. Participation of industry members at the Board level is one means of achieving this, but equally there are other means. The main requirement is for the Board to remain responsive to their customers and stakeholders needs – and be accountable if they are not.
RWE npower plc	Yes	RWE npower does not believe any change to the existing membership need to be made.

Question 8: Do you agree with the Workgroup's proposed approach that should the Panel Chairman be voted off the Board they are not automatically removed as the Panel Chairman?

Summary

Yes	No	Neutral/No Comment	Other
4	2	1	1

Responses

Respondent	Response	Rationale
SmartestEnergy	No comment	-
Drax	-	<p>We agree that the Board Chairperson should be subject to the same resolutions as the rest of the Board and therefore should be able to be voted off the Board by voting parties. However, we do not believe that in this instance, he/she should be automatically removed as Panel Chairperson. We believe it is possible that while the Board Chairperson may be voted off the Board, they could be a valuable member of the Panel as Panel Chair.</p> <p>In the event that the Panel Chair is not subject to automatic removal from their role on the Panel following their removal from the Board, there needs to be a process to allow the Panel to remove said Chair from the Panel. However, this is not within the remit of P324. We suggest such a process is progressed separately.</p>
British Gas	No	We do not agree with this approach. As noted in the workgroup report, it is expected that the Panel Chairman's role would become untenable following removal from a Board position and therefore the Panel Chairman is likely to resign. We believe this third option should be adopted if this is the expectation.
ScottishPower	Yes	While we believe that the Panel Chairman's position may become untenable should they be voted off the Board, there are separate governance arrangements for the appointment and removal of the Panel Chair and we believe these should be followed.
National Grid Electricity Transmission plc	Yes	If the role of Panel Chairman is filled by a separate person from the Board Chairman, then it is appropriate that they are both given a seat on the Board and are also subject to the same voting mechanism as other Board members. However, the appointment of the Panel Chairman is a separate

Respondent	Response	Rationale
		process from that of Board members and it feels appropriate that, should the Panel Chairman be voted off the Board, the fate of the individual fulfilling the role should be decided by the Panel under the existing mechanism in Section B of the BSC.
First Utility	No	As per the consultation, there were divided views in the working group on this questions – we believe this warrants more consideration.
SSE plc	Yes	Given that the intent of this modification is to better separate and identify the roles and governance of the Board and Panel; and that separate provisions apply to govern the appointment and removal of the Panel Chair; this approach seems appropriate.
RWE npower plc	Yes	RWE npower agrees with the workgroup’s proposed approach that should the Panel Chairman be voted off the Board they are not automatically removed as the Panel Chairman. We agree with the workgroup’s analysis that any Director should be subject to a binding resolution and therefore be voted off the Board if necessary. We consider that the third option goes beyond the intention of P324 towards Panel governance and therefore reject this option. The second option provided is the only viable option and delivers the intention of P324 providing necessary controls.

Question 9: Do you agree that the Board can appoint up to two Executive Directors at its discretion, as long as one appointment was the CEO?

Summary

Yes	No	Neutral/No Comment	Other
5	1	1	1

Responses

Respondent	Response	Rationale
SmartestEnergy	No	Paid employees of Elexon should not be on the board as voting members, although they should attend. It is important for the Board to be directing Elexon, not the other way around. It would also lead to "HR issues" if an Elexon employee were voted off the board.
Drax	-	We agree in principle that this should be allowed. However, we are not clear why two Executive Directors should be appointed, one seems adequate.
British Gas	Yes	-
ScottishPower	Yes	The option to appoint up to two Executive Directors to the Board could better facilitate liaison between the Board and the Executive. WE do not believe that such an appointment should be mandatory but would expect that if Executive members are appointed, at least one should be the CEO.
National Grid Electricity Transmission plc	Yes	This proposal could increase accountability of the Executive Directors to BSC Parties by allowing them to sit on the Board (and therefore be removed). It seems logical that if any Executive Directors should be appointed, that one of them should be the CEO.
First Utility	No comment	-
SSE plc	Yes	-
RWE npower plc	Yes	RWE npower agrees with the workgroup's analysis and that the Board can appoint up to two Executive Directors at its discretion, as long as one appointment is the CEO. This would follow the recommendation provided in the Knight report. We believe that allowing two Executive Directors to sit on the Board would allow for greater flexibility in who to appoint. This would also increase the accountability of members to BSC Parties, as they

Respondent	Response	Rationale
		can be voted off the Board in the same way as other Directors.

Question 10: Do you agree with the proposed solution that the Board should be allowed to remunerate any non-executive Director at its discretion?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	2

Responses

Respondent	Response	Rationale
SmartestEnergy	No	It would not be appropriate for industry board members to be paid when industry Panel (and other sub-committee) members are not.
Drax	No	Please see our answer to Question 2 above.
British Gas	Yes	We believe that remuneration should be left to the Board's discretion to use as required to attract the right candidate to the position or to allow the desired applicant to accept the role. As noted in Appendix 2, applicants for the previous position stated that they could not accept the role because they would have to take a pay cut from their current employer or their employer would need to be paid for their time. (We note that Article 30 of the Articles of Association may need amendment to reflect non-executives only receiving remuneration.)
ScottishPower	Yes	As outlined in our response to question 2, we believe that the Board should have the discretion to remunerate any non-executive director.
National Grid Electricity Transmission plc	Yes	The P324 Workgroup has discussed remuneration at some length, taking into account previous modifications P281, P303 and their respective decision letters from the Authority, the Knight Report recommendations and recent feedback from the recruitment agency responsible for identifying candidates for the "industry" non-executive director roles. Based on the information available, our current view is that the ability to remunerate all non-executive directors would increase the candidate pool for the "industry" non-executive director roles, thereby increasing the efficiency of the recruitment process. However, we recognise the opposing views expressed within the Workgroup and look forward to reading the consultation responses on this issue.

Respondent	Response	Rationale
First Utility	Maybe	As per Question 2, we agree with the working group's majority view that the potential Alternative Modification would better facilitate BSC Objective (d) due to cost savings and the good representation of 'industry' non-executive Directors to date. However in consideration of an Alternative Modification, allowing Board discretion in this regard should also be considered.
SSE plc	-	Please see response to Q2. Notwithstanding comments in response to Q2, remuneration of NEDs should be at the recommendation of a separately constituted Remuneration Committee and should be appropriately benchmarked against expectations of time and effort expended and external standards.
RWE npower plc	Yes	As previously expressed in question 2, RWE npower agrees with the proposed solution that the Board should be allowed to remunerate any Non-Executive Director at its discretion. The research conducted by ELEXON reveals that the lack of remuneration does have an impact on the size of the pool of credible candidates. Therefore, allowing 'industry' Non-Executive Directors to be remunerated would widen the talent pool, which will increase efficiency in finding and appointing the best candidate to ensure the most efficient and effective leadership of BSCCo. This would follow the recommendation expressed in the Knight report for Board members to be remunerated and reflect other industry Boards such as Gemserv and Xoserve, where Non-Executive Directors are also remunerated. However, we do believe that any remuneration should be reasonable with the necessary caps and controls in place, as any remuneration costs will only impact those BSC Parties who have a funding share who are required to pick up a share of those costs.

Question 11: Do you agree that there are no other potential Alternative Modifications within the scope of P324 that would better facilitate the Applicable BSC Objectives compared to the Proposed Modification?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	-
Drax	Yes	-
British Gas	Yes	-
ScottishPower	Yes	We believe that the P324 Workgroup has fully explored the options and that there are no other potential Alternative modifications.
National Grid Electricity Transmission plc	Yes	The Workgroup has discussed P324 at some length but has not identified any other potential Alternative Modifications.
First Utility	Yes	However we do note the discussion points on page 10 of the consultation under 'Are there any other alternative solutions', and that these should be considered with the exception of the proposed quorum requirements.
SSE plc	Yes	-
RWE npower plc	Yes	RWE npower agrees that there are no other potential Alternative modifications within the scope of P324 that would better facilitate the Applicable BSC Objectives compared to the Proposed Modification and existing Alternative solution. Please see our response to question 2.

Question 12: Will P324 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
4	3	0	1

Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	We may feel obliged to attend the odd AGM/EGM!
Drax	Not directly	<p>We will not have to make any changes to systems or processes (other than the formation of a new voting signatory) and therefore there will be no direct or quantifiable impact on Drax.</p> <p>However, P324 will promote efficiency in the implementation and administration of the balancing and settlements arrangements and therefore we will be positively impacted through these efficiencies.</p>
British Gas	No	-
ScottishPower	No	P324 does not have any impact on BSC systems but will require the registration of a new category of Authorised Party under BSCP 38. We do not envisage this having a significant impact on our organisation.
National Grid Electricity Transmission plc	Yes	There will be minor impacts on the Transmission Company arising from implementation of P324 as identified in section 4 of the consultation document. Essentially, this amounts to the Transmission Company, in its role as Shareholder of ELEXON, being required to attend any meeting where a vote is being held.
First Utility	No	-
SSE plc	Yes	Minor administrative and process impacts to set up authorised persons and ensure procedures are in place to exercise voting rights. There is no Information Systems impact.
RWE npower plc	Yes	P324 will impact RWE npower and other similar organisations, particularly those BSC parties who have a funding share. Therefore, it is important to note that should P324 be approved and Non-Executive Directors on the Board are to be remunerated, then the necessary caps and controls need to be in place to ensure any remuneration is reasonable, as BSC Parties will pick up a share of

Respondent	Response	Rationale
		those costs. Please see response to question 2 and 10.

Question 13: Will your organisation incur any costs in implementing P324?

Summary

Yes	No	Neutral/No Comment	Other
0	8	0	0

Responses

Respondent	Response	Rationale
SmartestEnergy	No	-
Drax	No	We do not envisage any necessary system or IT changes.
British Gas	No	-
ScottishPower	No	We do not envisage implementation of P324 having a significant cost impact on our organisation.
National Grid Electricity Transmission plc	No	The costs of implementing P324 would be negligible.
First Utility	No	-
SSE plc	No	Implementation costs are negligible.
RWE npower plc	No	We do not believe RWE npower will incur any costs in implementing P324 other than our share in any remuneration agreed.

Question 14: Do you have any further comments on P324?

Summary

Yes	No
0	8

Responses

Respondent	Response	Comments
SmartestEnergy	No	-
Drax	No	Not at this time.
British Gas	No	-
ScottishPower	No	-
National Grid Electricity Transmission plc	No	-
First Utility	No	-
SSE plc	No	-
RWE npower plc	No	We do not have any further comments.