

# Assessment Procedure Consultation Responses

## P383 'Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281'

This Assessment Procedure Consultation was issued on 2 July 2019, with responses invited by 22 July 2019.



### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Flexitricity Limited	1/1	Supplier, Non-BM service provider
IMServ	0/1	Half Hourly Data Aggregator (HHDA)
Engie	2/0	Generator, Supplier
RWE Supply and Trading GmbH	4/2	Generator, Supplier, Interconnector User, Non Physical Trader, Energy Contract Volume Notification Agent (ECVNA), Metered Volume Reallocation Notification Agent (MVRNA)
Stark	0/4	Non Half Hourly Data Aggregators (NHHDA), Non Half Hourly Data Collectors (NHHDC), HHDA, Half Hourly Data Collectors (HHDC)
TMA Data Management Ltd	0/4	HHDC, HHDA, NHHDC and NHHDA
The Association for Decentralised Energy	0/1	Trade Association (representing over 150 members)

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Question 1: Do you agree that P383 does not meet the Self-Governance Criteria and so should not be progressed as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	No rationale provided
IMServ	Yes	No rationale provided
Engie	Yes	It has a material beneficial effect on competition
RWE Supply and Trading GmbH	Yes	The modification will improve competition in the electricity market and therefore better facilitates BSC Objective (c) "Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity".
Stark	Yes	P383 will have a material and beneficial impact on competition in the generation of electricity for storage operators participating with other generators; will also be of benefit to matters relating to sustainable development & operation of the national transmission system. Therefore, it should not be treated as a Self-Governance Modification as it materially impacts Self-Governance criterion (ii), (iii) and (iv).
TMA Data Management Ltd	Yes	No rationale provided
The Association for Decentralised Energy	Yes	No rationale provided

## Question 2: Do you agree with the Workgroup that the draft legal text delivers the intention of P383?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	No	<p>The draft legal text (and the accompanying p383 documentation) only refers to Suppliers as the potential Registrants for a storage facility operator (2.12.1). The text is not cognisant of the upcoming role of Virtual Lead Parties (VLPs) in providing BM access as aggregators of SVA-registered generating units, including storage facilities.</p> <p>Through the P344 TERRE/ Wider Access modification, VLPs will accede to certain sections of the BSC and the CUSC. GC0097 outlines specific technical requirements for VLPs operating as a BSC Party, including communications and metering. Furthermore, the CMP295 proposal is developing appropriate contractual agreements to allow a VLP to sign a Bilateral Agreement under Schedule 2 of the CUSC.</p> <p>The assumption that a Supplier will operate as the Registrant seems to stem from the workgroup's declaration that "where a facility's Metering Systems are registered for SVA, it is the Supplier that the BSC Party responsible for the storage facility's Metering Systems and the CUSC Party liable for the associated network charges" [P383_AC_Assessment Procedure Consultation]. This will also be true for a VLP as they will hold some BSC Party responsibilities and liability under the CUSC for network charges for any relevant storage facility. A VLP may therefore meet the criteria to fulfil the Declaration submission role currently outlined only for Suppliers in the P383 solution.</p> <p>We therefore believe that the draft legal text should refer to the responsibilities of a Supplier or VLP as the potential Registrant for a storage facility operator. This change will avoid creating a barrier to participation to independent aggregators, thereby better facilitating BSC Objectives (c) (competition) and (d) (efficiency).</p>

Respondent	Response	Rationale
IMServ	Yes	No rationale provided
Engie	Yes	No rationale provided
RWE Supply and Trading GmbH	Yes	No rationale provided
Stark	Yes	No rationale provided
TMA Data Management Ltd	Yes	No rationale provided
The Association for Decentralised Energy	No	<p>The draft legal text (and P383 more widely) as currently drafted fails to take into account the role of Virtual Lead Parties (VLPs) that was created under the P344 modification. VLPs will provide BM access as aggregators of SVA-registered generating sites, including storage facilities.</p> <p>VLPs will accede to certain sections of the BSC and CUSC in order to take part in TERRE and Wider BM Access. This means that the assumption that the Supplier will be the only party acting as a Registrant for a storage facility operator (2.12.1) is incorrect. VLPs will hold some BSC party responsibilities and liability under the CUSC for network charges relating the relevant storage facilities. Given that from December 2019 (go-live of Wider Access) a VLP will be able to act as the aggregator of SVA-registered generating units, including storage facilities, it is clear that, in some circumstances, they should be the party undertaking the Declaration submission role.</p> <p>Where a VLP fulfils this role, the Supplier would receive from the SVAA notification of successful validation of a Declaration and association Declaration ID for each SVA Storage Facility.</p> <p>The draft legal text should therefore be updated to refer to the responsibilities of a Supplier or VLP as the potential Registrant for the storage facility operator. This change will avoid creating a barrier to participation to independent aggregators, thereby better facilitating BSC Objectives (c) (competition) and (d) (efficiency).</p> <p>The current legal text fails to facilitate objectives (c) and (d) and may be detrimental against Objective (e) as it appears not to align with the necessity to ensure that markets “should contain transparent and fair rules to allow independent aggregators to fulfil their roles as intermediaries and to ensure that the final customer adequately benefits from their</p>

Respondent	Response	Rationale
		activities”, as stated in the legislation on common rules for the internal market in electricity, adopted on 26 March 2019.

Question 3: Do you agree that the draft redlined changes to BSCP508 and BSCP503 deliver the intention of P383?

### Summary

Yes	No	Neutral/No Comment	Other
4	2	0	1

### Responses

Respondent	Response	Rationale
Flexitricity Limited	No	<p>It is acknowledged in BSCP508 that a storage facility's Metering System may be registered with more than one Supplier, and that in such cases, separate director-signed declarations should be prepared. However, no mention is made of the possibility that a storage facility may access the BSC through a VLP following BM Wider Access and TERRE implementation. We therefore suggest that the actions to be undertaken by a Supplier in the proposed redlined changes in BSCP508 3.15 and 3.16 and the details to be requested in Annex – SVA Storage Facility Details could be fulfilled by a Supplier(s) and/ or a VLP.</p> <p>BSCP508 4.3.1 redlined changes would be amended from,</p> <p>“Where more than one Supplier registers an SVA Storage Facility's Metering Systems, the SVA Storage Facility Operator must complete a separate Declaration letter for each Supplier.[...]</p> <p>to,</p> <p>“Where more than one Supplier and/or Virtual Lead Party (VLP) registers an SVA Storage Facility's Metering Systems, the SVA Storage Facility Operator must complete a separate Declaration letter for each Supplier or VLP.”</p>

Respondent	Response	Rationale
		In the case that a VLP fulfilled this role, the Supplier would receive from the SVAA notification of successful validation of a Declaration and association Declaration ID for each SVA Storage Facility.
IMServ	Partial	We are happy with BSCP503 changes but have a question on BSCP508, see our response to question 15.
Engie	Yes	No rationale provided
RWE Supply and Trading GmbH	Yes	No rationale provided
Stark	Yes	No rationale provided
TMA Data Management Ltd	Yes	No rationale provided
The Association for Decentralised Energy	No	Please see our answer to Question 2.

Question 4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P383 which would better facilitate the Applicable BSC Objectives?

## Summary

Yes	No	Neutral/No Comment	Other
6	0	1	0

## Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	No rationale given
IMServ	Yes	No rationale given
Engie	Yes	Whilst the Storage submission could go directly to the BSC Co. this would then be reported to the supplier as such this alternative is not an improvement of the proposed approach.
RWE Supply and Trading GmbH	Yes	No rationale given
Stark	Yes	No rationale given
TMA Data Management Ltd	Yes	No rationale given
The Association for Decentralised Energy	Yes	No rationale given

## Question 5: Will the implementation of P383 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	<p>Flexitricity operates as a Supplier in the Balancing Market and is also participating in the P344 TERRE/ Wider Access process, undertaking registration as a VLP.</p> <p>As a Supplier, P383 will impact our organisation in the ways identified by the workgroup.</p> <p>As the proposed solution builds upon the measures for reporting data for the calculation of Capacity Market (CM) and Contracts for Difference (CfD) charges, this would have minimal impact as it will be built upon into our existing processes. We would request that P383 monthly reporting timelines are tied up as far as possible with existing reporting and submission timelines.</p> <p>As outlined above, we believe we should be able to submit a director-signed declaration as either a Supplier or a VLP in order to request a relevant storage facility's Imports are excluded from the calculation of TNUoS and BSUoS charges.</p>
IMServ	Yes	<p>If our assumption included in our response to question 15 is correct, there will be little impact on our organisation since the requirements on HHDA's will change little from P344 / P354 requirements.</p>
Engie	Yes	<p>There will be initial cost associated with billing systems and following the process.</p>
RWE Supply and Trading GmbH	No	<p>No rationale provided</p>
Stark	Yes	<p>Impact will be minor code adjustment to HHDA system to be able to differentiate between</p>

Respondent	Response	Rationale
		instructions sent to it by its Supplier and those sent by SVAA, will be important to acknowledge the File Sequence Number and Instruction Number included in two D0354 data flows may be the same except that one is sent by a Supplier and the other by the SVAA however both must be actioned as independent instructions.
TMA Data Management Ltd	Yes	There is some potential impact on the system and procedures.
The Association for Decentralised Energy	No	No rationale given

## Question 6: Will your organisation incur any costs in implementing P383?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	The management of additional data flows will incur an incremental additional cost from our service provider, ENSEK.
IMServ	Yes	Minimal impact
Engie	Yes	There will be initial cost associated with billing systems and following the process.
RWE Supply and Trading GmbH	No	We do not envisage that there we will incur any costs in implementing P383 at this time. However, it is an administratively complex solution which may introduce future additional costs for our Supply Business.
Stark	Yes	Minor resource costs involved with implementing the required coding changes for Question 6.
TMA Data Management Ltd	Yes	The implementation of P383 is expected to have a low cost impact.
The Association for Decentralised Energy	No	No rationale given

## Question 7: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	3	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	Flexitricity has no view on this question.
IMServ	Yes	No rationale given.
Engie	Yes	No rationale given.
RWE Supply and Trading GmbH	No Comment	No rationale given.
Stark	Yes	Whilst there are the risks associated with increased activities these should not be materially significant, as P383 builds on processes that either exist or in development.
TMA Data Management Ltd	Yes	We agree that P0383 is not a Settlement risk but as with EMR, PAF can be used to ensure that all parties are fulfilling their obligations.
The Association for Decentralised Energy	No Comment	The ADE has no view on this question.

Question 8: Please indicate how many storage facilities you expect Suppliers to be declaring under the process that P383 seeks to implement

## Summary

Yes	No	Neutral/No Comment	Other
1	1	4	1

## Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	Flexitricity has no view on this question.
IMServ	No Comment	No view, not sure leaving a Yes / No response box is suitable for the question being posed.
Engie	Yes	We expect numbers to be in the 10's rather than the 100's of providers
RWE Supply and Trading GmbH	No Comment	We have no information on the extent to which the modification proposal will impact on suppliers. However, we are concerned that the proposal will place further obligations on suppliers and their agents and increase costs which they may be unable to recover
Stark	N/A	No rationale given.
TMA Data Management Ltd	No Comment	We do not have visibility of that information.
The Association for Decentralised Energy	No	The ADE has no view on this question.

Question 9: Do you agree with the Workgroup that the new obligations placed on Suppliers are appropriate in delivering the P383 solution?

## Summary

Yes	No	Neutral/No Comment	Other
3	2	2	0

## Responses

Respondent	Response	Rationale
Flexitricity Limited	No	As outlined above, we believe that Suppliers are not the only market participants who can undertake these new obligations.
IMServ	Yes	No rationale given.
Engie	Yes	The obligation are driven by the CUSC obligations as such the supplier is the only part that can take on the obligations and provide/receive storage applications.
RWE Supply and Trading GmbH	No Comment	Delivering an SVA solution will impact on Suppliers where they are responsible for the relevant metering systems.
Stark	N/A	No rationale given.
TMA Data Management Ltd	Yes	No rationale given.
The Association for Decentralised Energy	No	Please see the response to Question 2. If the legal text is amended to include VLPs, then the obligations are appropriate to delivering the solution.

## Question 10: Do you agree with the Workgroup's recommended Implementation Date

### Summary

Yes	No	Neutral/No Comment	Other
6	0	0	1

### Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	It is appropriate that the P383 implementation date is tied to the implementation date of CUSC Modifications CMP280 and CMP281.
IMServ	Partial	In choosing an implementation date of 01/04/2021, this must present some risk in that market conditions, requirements and a whole host of other factors may change between now and then. This does leave Parties needing to decide whether to implement these changes now in the hope that nothing changes or wait 17 months then try and remember what the requirements were.  How will Elexon track that any other changes do/don't impact P383? Therefore, it might be useful to consider an extra reminder / newscast type communication as the go live date approaches?
Engie	Yes	No rationale given.
RWE Supply and Trading GmbH	Yes	No rationale given.
Stark	Yes	No rationale given.
TMA Data Management Ltd	Yes	We agree with the proposed April 2020 implementation.
The Association for Decentralised Energy	Yes	It aligns with the implementation dates for CMP280 and CMP281.

## Question 11: Is it appropriate for a storage operator to submit their own declarations where such storage operator is a BSC Party?

### Summary

Yes	No	Neutral/No Comment	Other
2	1	4	0

### Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	Flexitricity has no view on this question.
IMServ	No Comment	No view
Engie	No	The submission should be via the supplier as they are the party with the obligation and who receive the relief that can potentially be passed on the storage customer
RWE Supply and Trading GmbH	No Comment	On 26th June 2019 Ofgem issued a "Statutory Consultation on electricity generation licence changes and next steps" on "Clarifying the regulatory framework for electricity storage". This document included draft licence conditions, which, amongst other things, created an obligation on Generation Licensees to make declarations to relevant suppliers in relation to the configuration of sites where storage facilities were owned and operated by such Licensees. Given this is a licence condition, it would seem appropriate to review the requirements set out in the proposed modification to ensure that they do not duplicate the processes envisaged under the Licence.
Stark	Yes	Ensures accountability under the BSC & acknowledgment of all responsibilities.
TMA Data Management Ltd	No Comment	We do not have any comment.
The Association for Decentralised Energy	Yes	No rationale given.

Question 12: If any issue identified by SVAA were to be corrected from the Settlement Day the issue first took effect (up to 14 months), what is the longest period of time between checks by SVAA that you would be willing to accept? Please explain your rationale.

## Summary

Yes	No	Neutral/No Comment	Other
1	0	6	0

## Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	Flexitricity has no view on this question.
IMServ	No Comment	No rational given
Engie	Yes	This should follow the normal settlement process
RWE Supply and Trading GmbH	No Comment	We do not any detailed comments on this matter, though we note that the processes should ensure that the integrity of settlement is maintained at all times.
Stark	Neutral	No rational given
TMA Data Management Ltd	No Comment	We do not have any comment.
The Association for Decentralised Energy	No Comments	The ADE has no view on this question.

Question 13: How far back should any issue be corrected? For example if an issue is identified 14 months after the date it first started, should the correction be made from the point at which it first started or should the point at which a correction is applied be limited? If you believe it should be limited, by how much? Please explain your rationale.

## Summary

Yes	No	Neutral/No Comment	Other
1	0	6	0

## Responses

Respondent	Response	Rationale
Flexitricity Limited	No Comment	Flexitricity has no view on this question.
IMServ	No Comment	We are happy to support corrections in line with any other SVA traded site so 14 months is no issue.  Is it envisaged that there could be a Post Final dispute process? What might this look like?
Engie	Yes	This should follow the normal settlement process, the regular monitoring will provide the comfort that long re-runs are unlikely to occur.
RWE Supply and Trading GmbH	No Comment	The normal processes should apply to the correction of settlement including the disputes process in relation to material errors.
Stark	Neutral	No rationale given
TMA Data Management Ltd	No Comment	We do not have any comment.
The Association for Decentralised Energy	No Comments	The ADE has no view on this question.

Question 14: Do you agree with the Workgroup’s initial unanimous view that P383 does better facilitate the Applicable BSC Objectives than the current baseline?

## Summary

Yes	No	Neutral/No Comment	Other
6	0	1	0

## Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	Flexitricity has no view on this question.
IMServ	Yes	No rationale given.
Engie	Yes	No rationale given.
RWE Supply and Trading GmbH	No Comment	The modification proposal should better facilitate competition (Objective (c)). However, additional processes are required to deliver the proposed solution which is administratively complex. In addition, as noted in this response the new processes interacts with the declarations envisaged under proposals to amend the Generation Licence as set out in the Ofgem “Statutory Consultation on electricity generation licence changes and next steps” on “Clarifying the regulatory framework for electricity storage,” published on 26 June 2019.
Stark	Yes	No rationale given
TMA Data Management Ltd	Yes	No rationale given
The Association for Decentralised Energy	Yes	Subject to inclusion of VLPs as a potential Registrant, P383 better facilitates BSC Objectives (a), (c) and (d), for the reasons outlined in the consultation document.

## Question 15: Do you have any further comments on P383?

### Summary

Yes	No
3	4

### Responses

Respondent	Response	Comments
Flexitricity Limited	Yes	<p>We question how the proposed SVA Storage Facilities Register publication requirement would interact with Ofgem’s proposed Supplementary Standard Conditions for electricity storage requirement for licensees to publish similar information for each storage facility e.g. “3/b/iv. The metering arrangements in place between the electricity storage facility and final consumer at the electricity storage facility.”</p> <p>It would be preferential to avoid duplication of publication requirements.</p>
IMServ	Yes	<p>BR1.24 implies that a HHDA would continue to submit D385 reports even though the Supplier has changed from the original appointment; else SVAA would not receive data where the Supplier Id did not match the original appointment.</p> <p>Under BR1.25 following the case where ‘Where a Supplier changed, the SVAA should mark a declaration as no longer valid. New Supplier should not be notified in such instance.’ Does this mean SVAA would then issue a D354 with an end date matching the end date of the previous Supplier?</p> <p>Thus the process becomes (for example)</p> <p>Receive D354 from SVAA</p> <p>Assuming this is valid, HHDA issues D355</p> <p>HHDA generates D385 in line with Settlement Calendar</p> <p>If D209 received by HHDA for new Supplier, continue to issue D385s</p> <p>SVAA detects difference in Supplier,</p>

Respondent	Response	Comments
		SVAA instructs HHDA to stop issuing D385s, via D354 with appropriate end date  Is this correct?  This requirement doesn't seem to have been captured in BSCP508?
Engie	No	No rationale given.
RWE Supply and Trading GmbH	Yes	On 26th June Ofgem issued a Consultation on electricity generation licence changes and next steps on Clarifying the regulatory framework for electricity storage. The proposed modification proposal should be reviewed in the context of the proposal to amend the Generation Licence and introduce new business processes under the licence. These processes may remove the need for declaration under proposed arrangements, and may indeed require new processes to administer the potential outcomes.
Stark	No	No rationale given
TMA Data Management Ltd	No	No rationale given
The Association for Decentralised Energy	No	No rationale given