

CP Consultation Responses



CP1510 'Allow the online management of registrations, Market Entry and Market Exit'

This CP Consultation was issued on 8 October 2018 as part of CPC00790, with responses invited by 2 November 2018.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Flexitricity Limited	1/1	Supplier, Non BM Services provider
npower	1/1	Supplier, Supplier Agent
ScottishPower Energy Management Limited	4/2	Generator, Supplier, Interconnector User, Non Physical Trader, ECVNA, MVRNA
SP Distribution SP Manweb	1/0	Distributor
SSE Electricity Ltd	1/1	Supplier, NHHMOA
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC, NHHDA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Flexitricity Limited	✓	✗	✗	✓
npower	✓	✓	✗	✓
ScottishPower Energy Management Limited	✓	✓	✗	✓
SP Distribution SP Manweb	✓	✗	✗	✓
SSE Electricity Ltd	✓	✓	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓

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Question 1: Do you agree with the CP1510 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	The proposed solution should make it easier for new market participants to keep track of their progress through the market entry process and give existing participants a better view of what they have submitted. The current system, while functional isn't particularly efficient and was clearly developed when Fax was a dominant technology in a way it no longer is, and thus an update to an online service would be a very sensible modernisation.
npower	Yes	We view the proposed change as a positive move as an alternative to the current manual, inefficient process.
ScottishPower Energy Management Limited	Yes	The existing processes for market entry, exit etc. using paper copies and fax are outdated and should be updated to permit the use of an electronic interface to the central registration systems. This will also make it easier for BSC Parties to check and maintain their registration data. This is important given the expected increase in registration activity expected following the implementation of Project TERRE.
SP Distribution SP Manweb	Yes	None provided
SSE Electricity Ltd	Yes	<p>We agree with this proposal for a 'Self Service Gateway' online platform to simplify the Market Entry, Market Exit, BM Unit registration and Authorised Signatories processes. By reducing reliance on manual processes and paper forms, these processes can be more user friendly, timely and efficient.</p> <p>We request clear guidance materials be provided alongside the online platform, outlining relevant obligations relating to each part of the respective process being completed. This may require current Market Entry, Exit, BM Unit registration and Authorised Signatories process guidance documents to be updated or separate guidance documents to</p>

Respondent	Response	Rationale
		<p>be created specifically related to completing the respective process via the online platform. Clear formatting rules, instructional pointers on completion of particular fields or directions on key participant requirements at each stage of the process may also be helpful to include as part of the online applications.</p> <p>Security of the registration process may also be enhanced via Elexon management of permissions access via passwords, etc. However, it is important that multiple levels of access are provided to users to enhance efficient and easy use of the system – for example, multiple contributors may need permissions to access and complete parts of online forms before the Signatories access the forms to complete their end steps in a process.</p> <p>We also note that the manual processes/ paper forms will still be available for those who wish to use them. It is important that these remain available until the online platform has been operational for an adequate time period to prove it is reliable, accurate and the intended benefits are realised.</p>
TMA Data Management Ltd	Yes	None provided

Question 2: Do you agree that the draft redlining delivers the CP1510 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Flexitricity Limited	Yes	The draft redlining delivers CP1510.
npower	Yes	N/A
ScottishPower Energy Management Limited	Yes	From a quick review of the draft BSCPs, these appear to deliver the intent of CP1510.
SP Distribution SP Manweb	Yes	None provided
SSE Electricity Ltd	Yes	None provided
TMA Data Management Ltd	Yes	None provided

Question 3: Will CP1510 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	3	0	0

Responses

Respondent	Response	Rationale
Flexitricity Limited	No	The proposed change is not mandatory so there will be no requirement for Flexitricity to make any changes if the proposal is approved. We believe that the new system will be more convenient than the current one, so the change would mean that Flexitricity will be able to monitor our interaction with the BSC more effectively.
Npower	Yes	The impact that the change will have on npower will vary depending on the extent to which we undertake any of the processes in the applicable BSCPs, and whether we opt to use the Self Service Gateway as it will not be mandatory. We see that the Self Service Gateway has the potential to provide some efficiency savings and that having the ability to submit and track this through a gateway will be more secure.
ScottishPower Energy Management Limited	Yes	CP1510 should make it easier for ScottishPower to check and maintain its registration data ensuring that it is kept up to date and make any required changes.
SP Distribution SP Manweb	No	None provided
SSE Electricity Ltd	Yes	There could be minor impacts to our organisation, should we need to amend relevant internal processes in order to utilise the 'Self Service Gateway' online platform. We request clear guidance materials to be provided by ELEXON to accompany implementation of the online platform, to minimise any disruption to customers who wish to use it. We note that the manual processes/paper forms will still be available for customers who do not wish to utilise the online platform.
TMA Data Management Ltd	No	None provided

Question 4: Will your organisation incur any costs in implementing CP1510?

Summary

Yes	No	Neutral/No Comment	Other
0	6	0	0

Responses

Respondent	Response	Rationale
Flexitricity Limited	No	As the change is not mandatory, there will be no requirement for Flexitricity make any system changes, and thus incur any costs.
npower	No	None provided
ScottishPower Energy Management Limited	No	We do not envisage there being any costs associated with the implementation of CP1510.
SP Distribution SP Manweb	No	None provided
SSE Electricity Ltd	No	None provided
TMA Data Management Ltd	No	None provided

Question 5: Do you agree with the proposed implementation approach for CP1510?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Flexitricity Limited	Yes	The attempts to future proof the solution as much as feasible is sensible because otherwise we will be in the same position again in a few years. The implementation date makes sense as well as it means that the new market participants joining as a result of P344 will be able to take advantage of the new system.
Npower	Yes	None provided
ScottishPower Energy Management Limited	Yes	We agree that CP1510 should be implemented in line with the implementation date of the Foundation Programme Release 1.
SP Distribution SP Manweb	Yes	None provided
SSE Electricity Ltd	Yes	We agree with the 28 February 2019 implementation date.
TMA Data Management Ltd	Yes	None Provided

Question 6: Do you have any further comments on CP1510?

Summary

Yes	No
2	4

Responses

Respondent	Comments
npower	<p>It is important that the Self Service Gateway solution is clear on which area of the interface corresponds to which BSCP appendix form.</p> <p>We welcome the proposed approach to review the need for online forms on the Elexon Portal at a later stage, post implementation.</p>
SP Distribution SP Manweb	<p>Although it states that there is the ability to continue to utilise the current forms, it is clear in the revised documentation that there will be a move to online. We would like to stress that all parties should be in agreement and have moved to the online process before the paper forms are removed.</p>

BSCP15

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP25

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP31

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP41

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP65

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP70

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP71

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP301

Respondent	Location	Comment
N/A	N/A	No comments received

BSCP507

Respondent	Location	Comment
N/A	N/A	No comments received

CRA Service Description

Respondent	Location	Comment
N/A	N/A	No comments received

CRA User Requirements Specification

Respondent	Location	Comment
N/A	N/A	No comments received