

# Report Phase Consultation Responses



## P397 'Assessing the costs and benefits of adjusting Parties' Imbalances following a demand disconnection'

This Report Phase Consultation was issued on 16 December 2019, with responses invited by 08 January 2020.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
IMServ	Supplier Agent
nPower	Supplier, Supplier Agent
SmartestEnergy	Supplier
SMS Energy Services Ltd.	Supplier Agent
Scottish Power Energy Networks	Distributor
SSE Electricity Ltd. And SSE Energy Supply Ltd. (SSE)	Supplier, Supplier Agent
TMA Data Management Ltd.	Supplier Agent
UK Power Networks	Distributor
Western Power Distribution (WPD)	Distributor

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Question 1: Do you agree with the Panel's initial majority recommendation that P397 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	-
nPower	Yes	All parties are more stretched now than ever and being required to take actions for what is a largely non-material event is not helpful.
SmartestEnergy	Yes	-
SMS	Yes	-
SP Energy Networks	Yes	-
SSE	Yes	We support this change and agree any future Demand Control Events are assessed against the cost to implement and managed accordingly. We agree that the change positively impacts BSC Objectives C and D.
TMA	Yes	We are very supportive of P397 to ensure that, when started, the process is worthwhile.
UK Power Networks	Yes	Implementation of P397 will positively impact Applicable BSC Objective (d) as this should enable the industry to forego running a potentially inefficient process unnecessarily. The P305 adjustment process would no longer be performed in situations where the cost of running the process is expected to exceed the perceived benefits.
WPD	Yes	We agree with the Panel's initial recommendations that P397 should be approved as it supports BSC Objective (d) promoting efficiency in the implementation and administration of the balancing and Settlement arrangements.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P397?

**Summary**

Yes	No	Neutral/No Comment	Other
7	1	1	0

**Responses**

Respondent	Response	Rationale																		
IMServ	Yes	-																		
nPower	Yes	-																		
SmartestEnergy	No comment	-																		
SMS	Yes	-																		
SP Energy Networks	Yes	-																		
SSE	Yes	-																		
TMA	Yes	-																		
UK Power Networks	Yes	Our reading of the redlined text suggest that the changes would deliver the intended effect.																		
WPD	No	<p>There is an inconsistency in respect of the response times for the LDSO to send the P0238 to BSSCo.</p> <table border="0"> <tr> <td>BSCP 504</td> <td>Section 3.3.15.2</td> <td>5WD</td> </tr> <tr> <td>BSCP 505</td> <td>Section 3.3.4.2</td> <td>5WD</td> </tr> <tr> <td>BSCP 515</td> <td>Section 3.14.2</td> <td>5WD</td> </tr> <tr> <td>BSCP 502</td> <td>Section 3.4.5.2</td> <td>4WD</td> </tr> <tr> <td>BSCP 503</td> <td>Section 3.4.3.2</td> <td>4WD</td> </tr> <tr> <td>BSCP 508</td> <td>Section 3.13.2</td> <td>4WD</td> </tr> </table> <p>Our understanding of P305 is that the LDSO has 5WD following notification of a Demand Control Event to send the P0238.</p>	BSCP 504	Section 3.3.15.2	5WD	BSCP 505	Section 3.3.4.2	5WD	BSCP 515	Section 3.14.2	5WD	BSCP 502	Section 3.4.5.2	4WD	BSCP 503	Section 3.4.3.2	4WD	BSCP 508	Section 3.13.2	4WD
BSCP 504	Section 3.3.15.2	5WD																		
BSCP 505	Section 3.3.4.2	5WD																		
BSCP 515	Section 3.14.2	5WD																		
BSCP 502	Section 3.4.5.2	4WD																		
BSCP 503	Section 3.4.3.2	4WD																		
BSCP 508	Section 3.13.2	4WD																		

Question 3: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P397, including the new subsidiary document 'Demand Disconnection Event Threshold Rules'?

## Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

## Responses

Respondent	Response	Rationale
IMServ	Yes	-
nPower	Yes	-
SmartestEnergy	No comment	-
SMS	Yes	-
SP Energy Networks	Yes	-
SSE	Yes	-
TMA	Yes	-
UK Power Networks	Yes	Our reading of the redlined text suggest that the changes would deliver the intended effect.
WPD	No	As detailed above, there is an inconsistency between the BSCPs.  In addition, we feel that the new Business Rules for Assessing Demand Control Event should also include a reference under Section 2.4 "Communications" to the response times or reference the relevant BSCPs where that obligation is held.

## Question 4: Will P397 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	-
nPower	Yes	If required to undertake the process in the future, it will be more efficient
SmartestEnergy	No	Not in any significant way
SMS	Yes	There will be some minor impacts to our processes if P397 is approved.
SP Energy Networks	Yes	-
SSE	No	-
TMA	Yes	P397 will impact lightly our procedures.
UK Power Networks	Yes	The impact will be for us to revise the Demand Disconnection/P305 process to await notification from Elexon that following a Demand Disconnection Event a P305 Adjustment will be undertaken.
WPD	Yes	There will be a positive impact to our organisation as we will not be required to unnecessarily submit a P0238 where a Demand Control Event occurs and the processing costs outweigh the benefits.

## Question 5: Will your organisation incur any costs in implementing P397?

### Summary

Yes	No	Neutral/No Comment	Other
2	7	0	0

### Responses

Respondent	Response	Rationale
IMServ	No	There will be no cost, rather a potential saving in the event that it is determined we do not need to operate the processes.
nPower	No	-
SmartestEnergy	No	-
SMS	Yes	There will be resource costs to implement any changes required to our systems and processes.
SP Energy Networks	No	-
SSE	No	-
TMA	Yes	We would incur very small costs in order to update our procedures.
UK Power Networks	No	For us this is a minor process change only. We have not identified any additional impacts if it were to be implemented outside of a scheduled BSC Release.
WPD	No	-

## Question 6: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	-
nPower	Yes	-
SmartestEnergy	Yes	-
SMS	Yes	-
SP Energy Networks	Yes	-
SSE	Yes	-
TMA	Yes	We are supportive of a prompt implementation date, such as the 06/02/2020.
UK Power Networks	Yes	This Modification introduces a cost/benefit test to an existing process which stands to reduce costs to industry parties and consequently costs to customers. For this reason it should be implemented as soon as practicable. The proposed date achieves this.
WPD	Yes	-

Question 7: Do you agree with the Panel's initial view that P397 should be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	-
nPower	Yes	-
SmartestEnergy	Yes	-
SMS	Yes	-
SP Energy Networks	Yes	-
SSE	Yes	-
TMA	Yes	-
UK Power Networks	Yes	By our reading of P397 it meets the Self-Governance criteria.
WPD	Yes	We agree with Panel's view that P397 should be treated as a Self-Governance Modification as it meets the BSC Self-Governance criteria.



## Question 8: Do you have any further comments on P397?

### Summary

Yes	No
0	9

### Responses

Respondent	Response	Rationale
IMServ	No	-
nPower	No	-
SmartestEnergy	No	-
SMS	No	-
SP Energy Networks	No	-
SSE	No	-
TMA	No	-
UK Power Networks	No	-
WPD	No	-