

Report Phase Consultation Responses

P419 'Enhanced Reporting of Demand Data to the NETSO to facilitate BSUoS Reform'

This Report Phase Consultation was issued on 19 January 2022, with responses invited by 2 February 2022.

Consultation Respondents

Respondent	Role(s) Represented
IMServ Europe Ltd.	Supplier Agent - HHDA
ScottishPower	Supplier
Npower Commercial Gas Ltd.	Supplier
InterGen	Generator



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P419 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	-
Npower Commercial Gas Ltd.	Yes	-
InterGen	Yes	We believe P419 will ensure BSC systems will be responsible for managing the declaration of eligible facilities and Metered Data is accurate and correct when calculating network charges.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P419?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	-
Npower Commercial Gas Ltd.	Yes	-
InterGen	Yes	-

Question 3: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P419?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	-
Npower Commercial Gas Ltd.	Yes	-
InterGen	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
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	-
Npower Commercial Gas Ltd.	Yes	-
InterGen	Yes	The implementation needs to be in time so that it supports, but does not impact the implementation of CMP308 and allows the SCAA sufficient time to be able to process declarations.

Question 5: Do you agree with the Panel's initial view that P419 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	ScottishPower is in agreement with Panels initial review that this should not be treated as Self-Governance however we would like to note CMP361 and 362 should be delivered as a package in parallel with CUSC.
Npower Commercial Gas Ltd.	Yes	We do not believe the self-governance criteria has been met because the proposal includes consumers impacts I.E the self-declaration of a non-final demand site.
InterGen	Yes	We also believe it will impact criteria (b) (ii), (iii) and (c).

Question 6: Do you agree with the Panel's initial recommendation that P419 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	Yes	-
ScottishPower	Yes	-
Npower Commercial Gas Ltd.	Yes	-
InterGen	Yes	-

Question 7: Do you have any further comments on P419?

Summary

Yes	No
1	3

Responses

Respondent	Response	Rationale
IMServ Europe Ltd.	No	-
ScottishPower	No	-
Npower Commercial Gas Ltd.	Yes	We would like to highlight our support for expanding the P383 solution so that it allows for suppliers and customers to submit BSUoS self-declarations directly to Elexon, as well as enabling bulk uploads and a fast-track approach for sites that are already exempt from the DUoS residual Non-Final Demand charges. We feel this is a positive step that aims to reduce impacts on consumers who have already certified their non-final demand status for other reasons.
InterGen	Yes	-