

Report Phase Consultation Responses

P429 'Switching off Participant-Reported PARMS Serials'

This Report Phase Consultation was issued on 16 November 2021, with responses invited by 29 November 2021.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Association of Meter Operators (AMO)	Trade Body
Corona Energy	Supplier
IMServ	Supplier Agent (HH and NHH DC/DA and MOA)
OVO Energy	Supplier, Supplier Agent (NHHDC/DA/MOA)
Scottish Power	Supplier, Supplier Agent
SMS	Supplier Agent (HH and NHH CVA/SVA MOA, HH and NHH DC/DA)

P429
Report Phase Consultation
Responses

2 December 2021

Version 1.0

Page 1 of 12

© Elexon Limited 2021

Question 1: Do you agree with the Panel's initial unanimous recommendation that P429 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
AMO	Yes	The value of the data has diminished to such an extent as to be pointless. The data has minimal value in the Performance Assurance Framework (PAF). The issues relevant at the time the PARMS serials were defined have changed. SVA Meter Operators are now governed under the Retail Energy Code (REC).
Corona Energy	Yes	-
IMServ	Yes	<p>We very much welcome the pragmatic recognition that this process has run its course and that it is not possible to address the many problems surrounding it to enable its continuation; nor is this required due to the advent of other more robust and valid means of sourcing performance data.</p> <p>Whilst the original intention of the production and use of PARMS serials was valid and intended to better achieve Objective (d) of the BSC, this has not proven to be the case and conversely has had a detrimental impact on the same Objective, since implementation. This has manifested itself in different ways during the course of their existence, including:</p> <ul style="list-style-type: none">• Effort from Elexon to undertake a TAPAP check to ensure consistent interpretation of requirements and reporting• Effort from Party Agents to make further report design changes following the above check• Incorrect monthly submissions from Suppliers noting who would be submitting PARMS serials on their behalf• Ongoing query resolution at Party Agents in dealing with the above incorrect submissions.• Effort from Elexon in chasing missing Supplier and Party Agent submissions

Respondent	Response	Rationale
		<ul style="list-style-type: none"> Inability to use the output for the intended purpose of performance assurance due to inconsistencies in the reporting across the industry <p>All of the above has resulted in the development and ongoing maintenance of PARMS serials being the most costly industry change software project which we have been required to deploy since 1998.</p>
OVO Energy	Yes	We agree that this facilitates objective (d) Promoting efficiency in the implementation of the balancing and settlement arrangements.
Scottish Power	Yes	<p>As outlined in the consultation document the cost and processing the PARMS reporting is non-value add due the inherent weakness of the data provided.</p> <p>The New Risk Dashboards that are under development will provide the insight required for industry participants.</p>
SMS	Yes	-

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P429?

Summary

Yes	No	Neutral/No Comment	Other
4	0	1	1

Responses

Respondent	Response	Rationale
AMO	Other	The report highlights 34 settlement risk dashboards accessible to Elexon staff. These dashboards should be published on the BSC data webpages unless there is clear reason of confidential data
Corona Energy	No comment	-
IMServ	Yes	-
OVO Energy	Yes	We can see no issues with the redlining
Scottish Power	Yes	Yes, the redlined changes deliver the intention of P429.
SMS	Yes	-

Question 3: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents (CSDs) deliver the intention of P429?

Summary

Yes	No	Neutral/No Comment	Other
4	0	2	0

Responses

Respondent	Response	Rationale
AMO	No comment	-
Corona Energy	No comment	-
IMServ	Yes	-
OVO Energy	Yes	We believe the redlining will deliver the solution
Scottish Power	Yes	-
SMS	Yes	-

Question 4: Do you agree with the Panel's recommended Implementation Date and approach?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
AMO	Yes	The earlier that stakeholders can cease to provide worthless data the better.
Corona Energy	Yes	Overall we do agree with the implantation date, however, we do think that it would be beneficial if the dashboard being created to provide insight and assurance in respect of each of the 34 Settlement Risks to be completed at the time of PARMS switch off in February 2022 rather than a year's gap to February 2023.
IMServ	Yes	As these serials are no longer being used for their intended purpose, and the creation, submission and subsequent query management of these reports each month is a cost and burden to the industry, primarily Party Agents, the implementation date should be as early as is possible. Furthermore, the lead time required to switch off something is not of the same concern as when implementing a new requirement, therefore all parties should be able to achieve this.
OVO Energy	Yes	Soon as reasonably practicable – Feb 2022 if possible and June 2022 if not.
Scottish Power	Yes	-
SMS	Yes	-

Question 5: Do you agree with the Panel's initial view that P429 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
AMO	Yes	-
Corona Energy	Yes	-
IMServ	Yes	-
OVO Energy	Yes	Due to impacts on Self Governance Criteria (b)(i) and (ii)
Scottish Power	Yes	-
SMS	Yes	-

Question 6: Do you agree with the Panel's initial consideration that P429 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	2	0

Responses

Respondent	Response	Rationale
AMO	No comment	Do not understand criteria
Corona Energy	No comment	-
IMServ	Yes	-
OVO Energy	Yes	We agree that this does not impact EBGL Article 18
Scottish Power	Yes	-
SMS	Yes	-

Question 7: Will P429 impact your organisation?

Summary

High	Medium	Low	None / No Comment	Other
1	1	3	1	0

Responses

Respondent	Response	Rationale
AMO	None	Not as a trade association, but members will see the reduced cost/time effort
Corona Energy	Low	Minimal impact
IMServ	High	This will have a "high" positive impact saving us circa 0.5 – 1 man days effort per month.
OVO Energy	Low	We will not need to provide reports and follow up with data. It will facilitate faster shut down of MPIDs, as will not need to wait for PARMS to shut down. IT support will also not be required. This is covered elsewhere by other obligations, so removal of obligations is welcome.
Scottish Power	Low	Positive impact in removing low value add work.
SMS	Medium	The running of PARMS processes will no longer be required, reducing system requirements. The FTE intervention to clear PARMS related queries will no longer be required.

Question 8: How much will it cost your organisation to implement P429?

Summary

High	Medium	Low	None / No Comment	Other
0	0	3	3	0

Responses

Respondent	Response	Rationale
AMO	None	Not as a trade association, but members will see the reduced cost/time effort
Corona Energy	None	-
IMServ	None	-
OVO Energy	Low	Minimal cost expected, if any
Scottish Power	Low	There will be a low cost to switch off IT reports for PARMS serial but this will be outweighed by the overall benefits.
SMS	Low	One off cost for IT involvement to switch off system processes: max one day One off cost for Process Document house-keeping: max one day

Question 9: What will the ongoing cost of P429 be to your organisation?

Summary

High	Medium	Low	None / No Comment	Other
0	0	0	6	0

Responses

Respondent	Response	Rationale
AMO	None	Not as a trade association, but members will see the reduced cost/time effort
Corona Energy	None	-
IMServ	None	-
OVO Energy	None	-
Scottish Power	None	There will be no ongoing costs but there will be a one off IT cost to implement to switch off the reporting for PARMS serials.
SMS	None	There is an ongoing saving linked to the removal of the obligations to process and follow up on PARMS reporting and the storing of the PARMS records/data. However, some of the saving in cost and FTE will be reallocated to future Settlement Risk reporting activities.

Question 10: Do you have any further comments on P429?

Summary

Yes	No
1	5

Responses

Respondent	Response	Rationale
AMO	No	-
Corona Energy	No	-
IMServ	Yes	When the PARMS serials were first introduced there was a belief that Party Agents would use these internally as management control reports thereby further justifying the process. This has never been the case as the timing of the reports and the window of activity reported on does not provide a sufficiently current and immediate view of performance: additionally the design and content of the serials does not align with internal reporting requirements. The PARMS serials are therefore not used internally by our business, and likely that of any other Party Agent.
OVO Energy	No	-
Scottish Power	No	-
SMS	No	-