

Send Back Consultation Responses

ELEXON

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P461 ‘Accurate Reporting of Customers Delivered Volumes to Suppliers’

This Send Back Consultation was issued on 13 May 2024, with responses invited by 24 May 2024.

Consultation Respondents

Respondent	Role(s) Represented
EPG Energy Ltd	Supplier
Bryt Energy Ltd	Supplier

Question 1: Do you agree that it is appropriate (provided that the customer has consented to the disclosure) for a Supplier to be provided with data on which of their customers caused Settlement to make adjustments to the Supplier's Imbalance Volume, by delivering a BOA through a VLP?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
EPG Energy	Yes	Confidential
Bryt Energy Ltd	Yes	The change proposed would ensure we are able to charge customers correctly.

Question 2: For what purpose(s) would you expect Suppliers to use this data?

Responses

Respondent	Rationale
EPG Energy	Confidential
Bryte Energy Ltd	To charge customers the correct proportion of their imbalance

Question 3: Do you agree that sending Suppliers inaccurate data about each customer’s contribution to any Imbalance adjustment could prevent Suppliers from issuing accurate customer bills?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
EPG Energy	Yes	Confidential
Bryte Energy Ltd	Yes	No rationale given

Question 4: To what extent do your answers to Q1-3 above also apply to Imbalance adjustments caused by the customer delivering a volume into the wholesale market (through a VTP, under Modification P415)? Please explain any differences.

Responses

Respondent	Rationale
EPG Energy	Confidential
Bryte Energy Ltd	All answers apply to P415 as well

Question 5: How material do you think inaccuracies to the P0287 data are currently (for Suppliers or customers)? Do you expect this to change in the future (if P461 is not approved, and P0287 data continues to be potentially inaccurate)?

Responses

Respondent	Rationale
EPG Energy	Confidential
Bryte Energy Ltd	No information on inaccuracies, but wouldn't expect it to improve if P461 isn't approved

Question 6: What impact would you expect implementation of P461 to have on Suppliers, customers and other industry parties (including any potential unexpected consequences)?

Responses

Respondent	Rationale
EPG Energy	Confidential
Bryte Energy Ltd	Improved Billing of customers

Question 7: Do you consider this Modification necessary to facilitate accurate billing of domestic and/or commercial customers?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
EPG Energy	Yes	Confidential
Bryte Energy Ltd	Yes	No rationale given

Question 8: Do you agree with the proposed Implementation Date for P461 of 26 February 2026? Will there be any additional implementation costs or ongoing costs you would like to highlight?

Summary

Yes	No	Neutral/No Comment	Other
0	1	1	0

Responses

Respondent	Response	Rationale
EPG Energy	No	Confidential
Bryte Energy Ltd	Neutral	No known additional costs at this point

Question 9: Do you have any further comments on P461?

Summary

Yes	No	Neutral/No Comment	Other
1	1	0	0

Responses

Respondent	Response	Rationale
EPG Energy	Yes	Confidential
Bryte Energy Ltd	No	No further rationale