

## P452 ‘Replacement of the Energy Bill Relief Scheme for non-domestic customer with the Energy Bill Discount Scheme’

This Urgent Modification Consultation was issued on 29 March 2023, with responses invited by 5 April 2023.

E L E X O N

Phase

Proposal

Consultation

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
ScottishPower	Supplier
ENGIE	Supplier

P452

Urgent Modification  
Consultation Responses

6 April 2023

Version 1.0

Page 1 of 12

Question 1: Do you agree with the Panel's initial unanimous recommendation that the P452 should be approved?

## Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

## Responses

Respondent	Response	Rationale
ScottishPower	Yes	None provided.
ENGIE	Yes	The proposal is in line with BSC Objective C.

## Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P452?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
ScottishPower	Yes	None provided.
ENGIE	Yes	None provided.

## Question 3: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
ScottishPower	Yes	None provided.
ENGIE	Yes	It is important that this modification is implemented urgently to avoid detriment to Suppliers who will be making payments to customers from mid-May onwards.

## Question 4: Do you agree with the Panel's assessment of the impact on the BSC Settlement Risks?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
ScottishPower	Yes	None provided.
ENGIE	Yes	This modification is a pragmatic solution to the problem of providing EBDS payments to suppliers and as such is not addressing a specific Settlement Risk, but is closest in effect to Objective C.

### Question 3: Do you agree with the Panel's initial view that P452 should not be treated as a Self-Governance Modification?

#### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

#### Responses

Respondent	Response	Rationale
ScottishPower	Yes	None provided.
ENGIE	Yes	As the activity envisaged by P452 is not a core BSCCo function, it is appropriate that this modification is subject to full governance.

Question 4: Do you agree with the Panel's initial recommendation that P452 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
1	0	1	0

### Responses

Respondent	Response	Rationale
ScottishPower	No comment	None provided.
ENGIE	Yes	P452 has no obvious link to energy balancing

## Question 7: Will P452 impact your organisation?

### Summary

High	Medium	Low	None	Other
1	0	1	0	0

### Responses

Respondent	Response	Rationale
ScottishPower	High	P452 is a facilitating modification, when included with all other processes within the EBRS, will have a high impact on suppliers.
ENGIE	Low	Although P452 is critical to us in providing a mechanism for us to receive payments owing to us under the EBDS scheme, the operational impact is low as it will utilise already existing procedures in place for the administration of the EBRS, for which BSCCo also acted as payment provider.



## Question 8: How much will it cost your organisation to implement P452?

### Summary

Solution	High	Medium	Low	None	Other
Proposed	0	0	0	2	0

### Responses

Respondent	Response	Rationale
ScottishPower	None	Looked at in isolation, P452 will have no implementation costs for us. However, the wider EBDs will, particularly reconciliation. If we identify any further costs/impacts, we will let you know.
ENGIE	None	We do not envisage any costs arising to us from implementing this modification.

## Question 9: What will the ongoing cost of P452 be to your organisation?

### Summary

Solution	High	Medium	Low	None	Other
Proposed	0	0	1	1	0

### Responses

Respondent	Response	Rationale
ScottishPower	None	See response to Q8
ENGIE	Low	We do not envisage any ongoing costs arising to us from this modification.

## Question 10: How long (from the point of approval) would you need to implement P452?

### Summary

0-6 months	6-12 months	>12 months	Other
1	0	0	0

### Responses

Respondent	Response	Rationale
ScottishPower	None	No lead time would be required
ENGIE	1 Working Day (WD)	We do not envisage any significant lead time to implement this modification provided the payment process remains the same as it was for EBR5.

## Question 11: Do you have any further comments on P452?

### Summary

Yes	No
0	2

### Responses

Respondent	Response	Rationale
ScottishPower	No	None provided.
ENGIE	No	N/A