

P287 'Allow the BSC Panel to conduct Modification Business via teleconference' Consultation Responses

Consultation issued on 15 June 2012

We received responses from the following Parties

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Electricity North West Limited	1/0	Distributor
Scottish and Southern Energy	8/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator
EDF Energy	10/0	Generator / Supplier / Party Agent / Consolidator / Exemptible Generator / Trader
IBM UK Ltd for and on behalf of the ScottishPower Group	7/0	Supplier / Generator / Trader / Consolidator / Exemptible Generator / Distributor
National Grid	1/0	Transmission System Operator

Question 1: Do you agree with the Panel's views that the Proposed Modification should be approved?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Electricity North West Limited	YES	P287 Proposed Modification should be approved to allow modification business to be discussed via teleconference and allow decisions to be made to prevent any delays to the modification process and timescales.
Scottish and Southern Energy	YES	We concur with the Panel's recommendation that P287 should be approved.
EDF Energy	YES	<p>We agree the Proposed Modification should be approved. It would be sensible to allow the BSC Panel to make decisions on Modification Business via teleconference. We also agree that P287 would better facilitate the achievement of BSC Objective (d), "promoting efficiency in the implementation and administration of the balancing and settlement arrangements".</p> <p>Since Panel meetings would only be held via teleconference in extreme circumstances, like an ad-hoc meeting convened at shorter notice or the upcoming Olympics, we are satisfied that for the vast majority of cases, face to face Panel meetings would continue to be normal practice.</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	YES	-
National Grid	YES	The additional flexibility that this modification will introduce (by allowing modification related business to be held by teleconference) will be beneficial.

Question 2: Do you agree that the draft legal text delivers the intention of P287?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Electricity North West Limited	YES	The legal text in appendix A does deliver the intention of P287 as it states that a decision can be made on Modification business by teleconference as long as one panel member is present at the location.
Scottish and Southern Energy	YES	In a convoluted way yes the legal text delivers the intention of P287 – however, it does not do so in a 'plain English' way.
EDF Energy	YES	-
IBM UK Ltd for and on behalf of the ScottishPower Group	YES	-
National Grid	YES	-

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

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
Electricity North West Limited	YES	The Panel's recommended implementation date of 1 working day after the Self- Governance appeal window is feasible.
Scottish and Southern Energy	YES	The proposed implementation date (of 3 rd August 2012) appears appropriate.
EDF Energy	YES	Given that the change is a Code only change that has no effect on Elexon's activities, BSC Parties and Party Agents, BSC Systems and processes, etc., we agree with the Panel's suggested implementation date of 1 Working Day, after the 15 day Self-Governance Appeal window has closed.
IBM UK Ltd for and on behalf of the ScottishPower Group	YES	-
National Grid	YES	-

Question 4: Do you agree with the Panel's view that P287 should be progressed as a Self-Governance Modification Proposal?

Summary

Yes	No	Neutral/Other
4	0	1

Responses

Respondent	Response	Rationale
Electricity North West Limited	YES	As there are no impacts on BSC parties or agents then P287 should be progressed through Self-Governance.
Scottish and Southern Energy	Cannot Answer	We note that section 7 (pg 8) refers to "Elexon will submit to the Authority, on the Panel's behalf a Self-Governance Statement detailing why the Panel believes P287 satisfies the Self-Governance Criteria". As at the time of writing (27 th June) this statement has not been placed on the Elexon website. This prevents us commenting on the detail as to why the Panel believes P287 satisfies the Self-Governance criteria. Therefore we are unable to answer this question as, without sight of the statement, we cannot agree (or disagree) with the detailed reasoning provided by the Panel.
EDF Energy	YES	The Modification Proposal only impacts Elexon and the BSC Panel, and has no impact on BSC Parties. There will be no material changes to BSC Panel meetings in allowing Modification Business to be discussed via teleconference in the manner proposed. We agree with the Panel's view that P287 should be progressed as a Self-Governance Modification.
IBM UK Ltd for and on behalf of the ScottishPower Group	YES	-
National Grid	YES	-

Question 5: Do you have any further comments on P287?

Summary

Yes	No	Neutral/Other
3	2	0

Responses

Respondent	Response	Rationale
Electricity North West Limited	NO	-
Scottish and Southern Energy	YES	<p>We have two additional comments.</p> <p>First, section 1 (pg 3) and section 2 (pg 4) refer to "Recent events" however these are not explained. Why is this detail lacking in the consultation document?</p> <p>Second, section 7 refers to the circumstances where the P287 solution might be used and in particular the comments, by the Panel Chairman, that "...Panel meetings would only be held via teleconference in extreme situations, like an ad-hoc meeting convened at shorter notice...". This seems very sensible. However, given this shorter notice period and in keeping with the openness and transparent environment noted in section 3 (pg 5) in our view steps should be taken to allow (i) any Modification Proposer and (ii) BSC Parties to participant (in the case of (i) dial in if called by the Panel Chairman to explain their new Modification the Panel) and listen into the Panel deliberations as it may not be practical for those parties to attend the Panel meeting at Euston Road at short notice (for exactly the same reason that Panel members cannot attend the said meeting – hence why they are dialing in). Allowing teleconference Panel meetings to be broadcast on the web would allow BSC Parties ((ii) above) to listen in and seems a pragmatic way forward. Providing dial-in details for any Modification Proposer presenting at the said Panel would seem another sensible way forward.</p>
EDF Energy	YES	The Draft Modification Report refers to Section F4.4.7(b) of the BSC. Note that the correct reference is B4.4.7(b).
IBM UK Ltd for and on behalf of the ScottishPower Group	YES	Teleconferencing is only a valid option if the technology works for all participants. The Chair should be given scope to declare the teleconference meeting non-quorate if Panel Members cannot actively participate in the meeting due to problems with the technology.

Respondent	Response	Rationale
		<p>Management of teleconferencing is key. The Chair presumably will manage the process so that all participants will know who is speaking at any moment (either via telephone or in person at the meeting). This will aid transparency for any potential observers who attend the Panel Meeting.</p> <p>Will "observers" be allowed to join the teleconference to listen to the meeting rather than attend in person?</p>
National Grid	NO	-