

P293 'Changes to BSC Section H 'Audit' and BSC Service Description for BSC Audit to reflect current Practice'

Consultation issued on 10 May 2013

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
EDF Energy	10/0	Generator/Supplier/Party Agent/Consolidator/Exemptable Generator/Trader
Electricity North West Limited	1/0	Distributor
Npower	9/0	Supplier/Trader/Consolidator/Party Agents
SSE Power Distribution PLC; Scottish Hydro Electric Power Distribution Ltd	2/0	Distributor
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA

Question 1: Do you agree that the draft legal text in Attachment A, and the redlined changes to the BSC Service Description for BSC Audit in Attachment B, deliver the intention of P293?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	We have not undertaken a formal legal review. We assume the proposed changes reflect the identified differences between the existing code and the "custom and practice" which the proposal is intended to legitimise, and remove inconsistencies with the BSC Audit Service description.
Electricity North West Limited	Yes	As the changes made reflect the current processes, services and terminology.
Npower	Yes	-
SSE Power Distribution PLC; Scottish Hydro Electric Power Distribution Ltd	Yes	-
TMA Data Management Ltd	Yes	-

Question 2: Do you agree with the Panel's suggested Implementation Date?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	1 October 2013 seems a pragmatic implementation date.
Electricity North West Limited	Yes	As the changes are applicable when the new BSC Audit and Qualification Service Provider's contract commences.
Npower	Yes	The implementation date should not impact the 2013/2014 audit period. Therefore, we agree with the suggested implementation date.
SSE Power Distribution PLC; Scottish Hydro Electric Power Distribution Ltd	Yes	-
TMA Data Management Ltd	Yes	The matching of the new BSC Auditor contract start date and the implementation date for P293 is not necessary as P293 merely updates the documentation in line with current practices, however October 2013 as the next available release works well.

Question 3: Do you agree with the Panel's view that P293 should be progressed as a Self-Governance Modification Proposal?

Summary

Yes	No	Neutral/Other
5	0	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	The proposal has an impact on details of the timing and publication of the audit report, but not on the essential requirement that BSC processes be audited, and the content of the audit report. It aligns the code with custom and practice adopted by the BSC Panel and ELEXON, with which participants appear to be comfortable. It does not appear (a) to have a significant material effect, or (b) to discriminate between different classes of BSC Party, and therefore appears to meet the criteria for self-governance.

Respondent	Response	Rationale
Electricity North West Limited	Yes	As there is no impact on BSC parties and the change is to align the documents to reflect current practice.
Npower	Yes	As there are no impacts on parties, we agree that this should be a Self-Governance Modification.
SSE Power Distribution PLC; Scottish Hydro Electric Power Distribution Ltd	Yes	-
TMA Data Management Ltd	Yes	P293 proposes to apply changes to bring the documentation in line with current practices with no impact on Parties, Party agents or central systems.

Question 4: 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
EDF Energy	Yes	The proposal appears to transfer responsibility for decisions on the timing and publication of the BSC Audit from the text of the BSC itself to the discretion of the BSC Panel on behalf of stakeholders. The Panel should re-assure itself that it has and will retain the power to make these decisions.
Electricity North West Limited	Yes	As the changes align the code and Service Descriptions to reflect current practices.
Npower	Yes	There are no foreseen impacts on parties other than Balancing and Settlement Code Auditor and ELEXON therefore; we agree that this modification should be approved.
SSE Power Distribution PLC; Scottish Hydro Electric Power	Yes	-

Respondent	Response	Rationale
Distribution Ltd		
TMA Data Management Ltd	Yes	-

Question 5: Do you have any further comments on P293?

Summary

Yes	No	Neutral/Other
2	3	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	<p>We welcome assurances in the consultation document that the BSC Panel on behalf of BSC Parties and other stakeholders will retain influence over the future timing and content of BSC Audit Reports through terms of reference agreed annually by the BSC Panel for BSC Audit.</p> <p>It is disappointing that the proposal appears to have been raised primarily to support a new BSC Audit Service contract, rather than in recognition of inconsistencies between the Code and the custom and practice that has evolved over time.</p>
Electricity North West Limited	No	-
Npower	Yes	<p>Going forwards, we would also encourage developing the risk-based approach for the Balancing and Settlement Code audit in the future. This will ensure that we have more focus on issues that are currently posing as a risk to the market.</p>
SSE Power Distribution PLC; Scottish Hydro Electric Power Distribution Ltd	No	-
TMA Data Management Ltd	No	-