

CP Consultation Responses

CP1421 'Linking BSCP520 obligations to the Operational Information Document'



This CP Consultation was issued on 6 October 2014 as part of CPC00747, with responses invited by Friday 31 October 2014.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
EDF Energy	10/0	Supplier, Generator, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator
Electricity North West	1/0	Distributor
Northern Powergrid	1/0	Distributor
RWE Npower	10/0	Supplier
ScottishPower	1/0	Supplier, Generator, Distributor, Supplier Agent
TMA Data Management Ltd	0/1	Supplier Agent
Western Power Distribution	4/0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
EDF Energy	✓	✗	✗	✓
Electricity North West	✓	✗	✗	✓
Northern Powergrid	✓	✗	✗	✓
RWE Npower	✓	✗	✗	✓
ScottishPower	✓	✗	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
Western Power Distribution	✓	✗	✗	✓

Question 1: Do you agree with the CP1421 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	To minimise issues surrounding operation of UMS market.
Electricity North West	Yes	We agree that the implementation of CP1421 will strengthen BSCP520 by clarifying the when 'local' Charge Codes shall be provided.
Northern Powergrid	Yes	Including 'hooks' to the OID will strengthen the position of ELEXON to control charge code applications however it will not remove the Statutory Instrument so will not prevent parties from permitting unmetered supplies connections to equipment deemed unsuitable by ELEXON, but are considered appropriate by the distributor.
RWE Npower	Yes	-
ScottishPower	Yes	We believe it is sensible to strengthen the BSCP as it makes the obligations a lot clearer and we welcome the removal of any duplication between the BSCP and the OID.
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	Greater clarity required for UMSOs, when they are asked to provide unmetered connections by customers.

Question 2: Do you agree that the draft redlining delivers the CP1421 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
EDF Energy	Yes	-
Electricity North West	Yes	We believe that the draft red-lining does deliver the intent of the proposed solution.
Northern Powergrid	Yes	The redlining will sufficiently obligate the processing of applications by ELEXON where the intention of the applicant is to install unmetered apparatus nationally.
RWE Npower	Yes	-
ScottishPower	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

Question 3: Will CP1421 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
0	7	0	0

Responses

Respondent	Response	Rationale
EDF Energy	No	-
Electricity North West	No	CP1421 will not have a direct and consequential impact on our organisation, but will ensure the process for providing 'local' Charge Codes is clearer and more robust.
Northern Powergrid	No	-
RWE Npower	No	-
ScottishPower	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

Question 4: Will your organisation incur any costs in implementing CP1421?

Summary

Yes	No	Neutral/No Comment	Other
0	7	0	0

Responses

Respondent	Response	Rationale
EDF Energy	No	-
Electricity North West	No	-
Northern Powergrid	No	-
RWE Npower	No	-
ScottishPower	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

Question 5: Do you agree with the proposed implementation approach for CP1421?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
EDF Energy	Yes	-
Electricity North West	Yes	The proposed implementation at the next available Release seems appropriate for this CP.
Northern Powergrid	Yes	The changes will have no impact on processes within Northern Powergrid.
RWE Npower	Yes	-
ScottishPower	Yes	-
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1421?

Summary

Yes	No	Neutral/No Comment	Other
1	6	0	0

Responses

Respondent	Response	Rationale
EDF Energy	No	-
Electricity North West	No	-
Northern Powergrid	Yes	While the changes are proposed to help minimise risk and ensure equipment is appropriate to be unmetered, we do not think that they will have the desired effect. The changes merely direct customers to apply for charge codes through ELEXON and does not stipulate what course of action should be taken should the application be rejected. It is our opinion, as the Statutory Instrument is the primary legislation that the scope for unmetered supplies connections to be allowed has not changed nor can be changed as part of BSCP520. This CP cannot address the scenario where multiple distributors have agreed to supply an unmetered connection but ELEXON have refused an application for a national charge code.
RWE Npower	No	-
ScottishPower	No	-
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

CP Redlined Text

BSCP520

No comments were received on the draft redlined text for CP1421.