

CP Consultation Responses

CP1428 'Inclusion of Party Agents in the event of Post Final Settlement Runs'



This CP Consultation was issued on 9 February 2015 as part of CPC00753, with responses invited by 6 March 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Stark Software International Ltd	0/1	Supplier Agent
TMA Data Management Ltd	0/1	Supplier Agent
SP Energy Retail Ltd	1/0	Supplier and Supplier Agent
EDF Energy	9/0	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent and Other (consolidator)
British Gas	1/0	Supplier
SSE Energy Supply Limited	1/0	Supplier

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Stark Software International Ltd	✓	✗	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
SP Energy Retail Ltd	✓	✓	✗	✓
EDF Energy	✓	✗	✗	✓
British Gas	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✗	✓

Question 1: Do you agree with the CP1428 proposed solution?

Summary

Yes	No
6	0

Responses

Respondent	Response	Rationale
Stark Software International Ltd	Yes	We agree with the strengthening of the current arrangements, but this should go further see Qu6.
TMA Data Management Ltd	Yes	N.A
SP Energy Retail Ltd	Yes	N.A
EDF Energy	Yes	N.A
British Gas	Yes	N.A
SSE Energy Supply Limited	Yes	We support the Trading Disputes Committee in their view that this clarification will support parties' understanding of their requirements to notify agents to ensure Settlement Errors is corrected.

Question 2: Do you agree that the draft redlining delivers the CP1428 proposed solution?

Summary

Yes	No
6	0

Responses

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

Respondent	Response	Rationale
Stark Software International Ltd	Yes	See Qu 6
TMA Data Management Ltd	Yes	N.A
SP Energy Retail Ltd	Yes	N.A
EDF Energy	Yes	N.A
British Gas	Yes	N.A
SSE Energy Supply Limited	Yes	N.A

Question 3: Will CP1428 impact your organisation?

Summary

Yes	No
2	4

Responses

Respondent	Response	Rationale
Stark Software International Ltd	No	N.A
TMA Data Management Ltd	No	As a NHHDC and NHHDA we already have processes in place to deal with the Post Final Dispute runs and data correction. The proposed changes only ensure that a Supplier informs all necessary Party Agents.
SP Energy Retail Ltd	Yes	Only to the extent that we will require to put in place processes to ensure that ScottishPower as a Supplier informs the appropriate DA and DC in a timely manner.
EDF Energy	No	N.A
British Gas	No	N.A
SSE Energy Supply Limited	Yes	We are impacted by this BSC CP insomuch that it relates to activities we undertake, however our existing processes would not need to change if CP1428 is approved.

Question 4: Will your organisation incur any costs in implementing CP1428?

Summary

Yes	No
0	6

Responses

Respondent	Response	Rationale
Stark Software International Ltd	No	N.A
TMA Data Management Ltd	No	N.A
SP Energy Retail Ltd	No	N.A
EDF Energy	No	N.A
British Gas	No	N.A
SSE Energy Supply Limited	No	N.A

Question 5: Do you agree with the proposed implementation approach for CP1428?

Summary

Yes	No
6	0

Responses

Respondent	Response	Rationale
Stark Software International Ltd	Yes	N.A
TMA Data Management Ltd	Yes	N.A
SP Energy Retail Ltd	Yes	N.A
EDF Energy	Yes	N.A
British Gas	Yes	N.A
SSE Energy Supply Limited	Yes	N.A

Question 6: Do you have any other comments on CP1428?

Summary

Yes	No
1	5

Responses

Respondent	Response	Rationale
Stark Software International Ltd	Yes	<p>The process of Suppliers notifying agents about disputes has been an area of weakness for a long time.</p> <p>Stark has had several 'chases' from SVAA requesting expected dispute Post RF data that we knew nothing about. This SVAA 'safety net' provides no cover if more than one dispute existed that covered the same period and we sent revised data for one and not another.</p> <p>This proposal in its current form does no more than requiring Suppliers to comply with existing rules.</p> <p>Even when notification takes place there can be confusion about the supplier(s) and dates involved and whether the DC's currently held data is the version now required, or that needs further correction in the light of the outcome.</p> <p>The process would be considerably improved by a definitive notification of the dispute outcome and detail coming directly from TDC or Elexon which would take away the risk of it being forgotten or partially carried out. Access to the data volumes considered would also enable the Agent to check if the current data was correct or required further correction.</p> <p>Another (far less satisfactory) alternative to the above would be to adopt the suggestion in the consultation "to have Suppliers proactively confirm any correction of Settlement Errors back to ELEXON".</p>
TMA Data Management Ltd	No	N.A
SP Energy Retail Ltd	No	N.A
EDF Energy	No	N.A

Respondent	Response	Rationale
British Gas	No	N.A