

CP Consultation Responses

CP1459 'Amendments to the process for performing a Post-Final Settlement Run'



This CP Consultation was issued on 11 April 2016 as part of CPC00766, with responses invited by 6 May 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ Europe Ltd	0/6	HH and NHH: MOP/DC and DA
TMA Data Management Ltd	0/8	NHHDC, NHHDA, HHDC and HHDA
British Gas	5/0	Supplier
E.ON Energy Solutions	5/0	Supplier
RWE npower	7/14	MA, NHHDC, NHHDA, HHDC and HHDA
EDF Energy	10/4	Generator, Supplier, ECVNA, MVRNA
Stark Software International (HH agents)	0/2	HHDC/DA
Stark Software International (NHH agents)	0/2	NHHDC/DA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
IMServ Europe Ltd	✓	✓	✗	✓
TMA Data Management Ltd	✓	✓	✗	✓
British Gas	✓	✗	✗	✓
E.ON Energy Solutions	✓	-	✗	✓
RWE npower	✓	✓	✓	✓
EDF Energy	✗	✓	✗	✓
Stark Software International (HH agents)	✗	✓	✗	-
Stark Software International (NHH agents)	✓	✗	✗	-

Question 1: Do you agree with the CP1459 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	2	0	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd	Yes	<p>As both a DC and a DA we have encountered instances of both late notification of a Trading Dispute and also non-notification of a Trading Dispute. Both these instances continue to occur despite changes made to the process over the years.</p> <p>If either of these instances occurs, the effort and time spent in raising and investigating the dispute is wasted.</p>
TMA Data Management Ltd	Yes	<p>We welcome the clarification of the Supplier's responsibility in informing the Party agents of the dispute and data correction required.</p>
British Gas	Yes	-
E.ON Energy Solutions	Yes	<p>We agree the proposed solution delivers the intent.</p>
RWE npower	Yes	<p>As highlighted in the CP, currently, there is no route from the Supplier that is responsible for informing HHDA/DC of required settlement correction. If implemented, the CP will bridge the gap between the Trading Disputes Committee (TDC) determination and confirmation of the Post-final Settlement Run (PFSR) schedule date.</p> <p>The implementation of explicit timescales is also welcomed. The 20WD timescale is positive as it bridges the gap between determination and confirmation.</p> <p>Currently, trading disputes are sent to HHDA at short notice. This can increase the risk of errors being made if the correction process does not leave sufficient time to perform a thorough check.</p> <p>We anticipate that there will be some small changes to HHDA processes, however, these are expected to be minimal and will be of benefit to Supplier and HHDC in the resolution of the TDC's determinations.</p>

Respondent	Response	Rationale
EDF Energy	No	No. We feel that the notification of the determination of the dispute should come directly from the TDC. Given that matters have arisen as a result of a dispute, it is sensible that the arbiter within this process notifies and monitors the dispute to its resolution.
Stark Software International (HH agents)	No	<p>We believe that DS should inform impacted DCs/DAs as indicated within the earlier CP1428</p> <p>The reasons are:</p> <ol style="list-style-type: none"> 1) DS is in full possession of the facts 2) DS has an incentive to ensure that all impacted parties and agents are aware of the dates and changed data requirements – including the identity of parties and their agents that are impacted by the event but that were not aware of (and did not raise) the dispute 3) DS is already required to advise “all BSC Agents, BSC Parties and BSC Auditor” and we cannot see how the additional reference to Supplier Agents is additionally onerous considering the reduction in settlement risk that it provides.
Stark Software International (NHH agents)	Yes	<p>By imposing specific obligations and timelines on Suppliers to inform all their affected agents , with penalties for failing to do so, will hopefully incentivise them sufficiently to give sufficient notice to allow corrections & Post-Final Settlement run to be scheduled and be confirmed for Settlement adjustments.</p> <p>Having an awareness of the correction required & dates involved will help the scheduling of runs as this is a manual process.</p>

Question 2: Do you agree that the draft redlining delivers the CP1459 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	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
IMServ Europe Ltd	No	We believe some additional changes to wording are required to achieve the desired result.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
E.ON Energy Solutions	Yes	Yes
RWE npower	Yes	-
EDF Energy	Yes	However we think there maybe some benefit in a timescales placed on the Relevant Agent(s) to respond to the instruction in 5.4.3.
Stark Software International (HH agents)	Yes	But we disagree with the desire to remove the "erroneous obligation on the Disputes Secretary (DS)"
Stark Software International (NHH agents)	Yes	-

Question 3: Will CP1459 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	2	1	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd	Yes	This should have a positive impact and eliminate those instances of late notification of a trading dispute which result in unnecessary urgency, pressure and risk to complete the work in the required timescales.
TMA Data Management Ltd	Yes	The impact is procedural and is minimal.
British Gas	No	-
E.ON Energy Solutions	Neutral	The change formalises arrangements and processes already in place. We anticipate the impacts to be low.
RWE npower	Yes	It is anticipated that the CP will deliver an improved process between the Supplier and their HHDA. The HHDA will have more time to perform checks prior to the corrections being made to the PFSR.
EDF Energy	Yes	-
Stark Software International (HH agents)	Yes	CP1428 has a beneficial impact – CP1459 then reduces it
Stark Software International (NHH agents)	No	-

Question 4: Will your organisation incur any costs in implementing CP1459?

Summary

Yes	No	Neutral/No Comment	Other
7	1		

Responses

Respondent	Response	Rationale
IMServ Europe Ltd	No	-
TMA Data Management Ltd	No	-
British Gas	No	-
E.ON Energy Solutions	No	-
RWE npower	Yes	Minimal cost, one off.
EDF Energy	No	-
Stark Software International (HH agents)	No	-
Stark Software International (NHH agents)	No	-

Question 5: Do you agree with the proposed implementation approach for CP1459?

Summary

Yes	No	Neutral/No Comment	Other
6	0	2	0

Responses

Respondent	Response	Rationale
IMServ Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
E.ON Energy Solutions	Yes	-
RWE npower	Yes	-
EDF Energy	Yes	-
Stark Software International (HH agents)	N/A	-
Stark Software International (NHH agents)	N/A	-

Question 6: Do you have any further comments on CP1459?

Summary

Yes	No
3	5

Responses

Respondent	Response	Comments
IMServ Europe Ltd	Yes	This would provide a timely opportunity for an additional but simple change which would facilitate the process. The current BSCP11/07 form does not include the mpan details relating to the dispute and supplier communication does not always contain such. For completeness and efficiency of process, this data item should be included on the form.
TMA Data Management Ltd	No	-
British Gas	No	-
E.ON Energy Solutions	No	-
RWE npower	No	-
EDF Energy	No	-
Stark Software International (HH agents)	Yes	<p>We repeat an extract from our response to the earlier CP consultation:</p> <p><i>The process of Suppliers notifying agents about disputes has been an area of weakness for a long time. Stark has had several 'chases' from SVAA requesting 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.</i></p> <p><i>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. 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.</i></p>

Respondent	Response	Comments
Stark Software International (NHH agents)	Yes	A further improvement would be for the Supplier's agents, (DC/DA) to be advised at an MPID level against specific trading dispute to improve visibility of the data being sent, especially if there is more than one dispute and also to be advised when the dispute has been successfully closed.

BSCP11

Respondent	Location	Comment
IMServ Europe Ltd	5.4.3 Note 18 - A BSC Party may decide to provide its agent(s) with the BSCP11/07 form as provided by the DS in 5.4.2.	We recommend the wording be changed from "may" to "should" in order to avoid any misinterpretation of the TDCs decision/instructions.