

CP Consultation Responses



CP1468 'Adoption of a standard template for raising Modifications'

This CP Consultation was issued on 8 August 2016 as part of CPC00769, with responses invited by 2 September 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
Npower Group	3/0	Generator, Supplier, Non Physical Trader
SSE Energy Supply Limited	1/0	Supplier
SSEPD	1/0	Distributor
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA
Western Power Distribution	1/0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
Npower Group	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
SSEPD	✓	✗	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
Western Power Distribution	✓	✓	✗	✓

Question 1: Do you agree with the CP1468 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	[None]
Npower Group	Yes	Npower agrees with the proposed solution of this CP, which is to adopt a standard template for raising modifications and that the new template captures all the essential information of the form BSCP40/03 as required by BSC Section F2.1.2.
SSE Energy Supply Limited	Yes	[None]
SSEPD	Yes	[None]
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	<p>Whilst we support the merits of introducing a standard template across all the codes that underpin the gas and electricity industry arrangements, the proposed Modification template guidance notes could be expanded to include reference to the electricity and relevant BSC code requirements to add clarity. The proposed template has ignored these requirements and appears focussed on Gas.</p> <p>For example the guidance notes on Section 2. "Governance - Justification for [Normal, Urgent, Self-Governance or Fast Track Self-Governance]" are not relevant to the Electricity Industry. Suggest, therefore that these sections are marked as "Not Used" or amended to make them either more "generic" to both industries or more specific to both industries such as including:</p> <p>Justification for Urgent –</p> <p>The Authority guidance on urgent changes, states that an urgent change should be linked to an imminent issue or a current issue that if not urgently addressed may cause one of the following:</p> <p>a) There is a very real likelihood of significant commercial impact upon parties, consumers or</p>

Respondent	Response	Rationale
		<p>other stakeholder(s);</p> <p>b) A significant impact on the safety and security of the electricity network or gas systems; or</p> <p>c) A Party to be in breach of any relevant legal requirements.</p> <p>In a similar way under section 8 "Implementation" the "User Pays" table could also be marked as "Not Used" for the Electricity Industry.</p>

Question 2: Do you agree that the draft redlining delivers the CP1468 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	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
British Gas	Yes	[None]
Npower Group	Yes	Yes, npower agrees that the draft redlined changes to BSCP40 delivers the proposed solution.
SSE Energy Supply Limited	Yes	[None]
SSEPD	Yes	[None]
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	We agree that the draft red-lining to BSCP40 is fine. However, we have some suggested changes noted above to the draft Standard Modification Template.

Question 3: Will CP1468 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
1	5	0	0

Responses

Respondent	Response	Rationale
British Gas	No	[None]
Npower Group	No	Npower does not foresee that CP1468 will have any major impact on our organisation. Our only comment in this regard is that the standard form appears to be longer than the previous BSCP40/03 form used to raise BSC modification proposals. It is therefore a possibility that it will take us longer to complete the form. Whilst this CP delivers consistency across all codes, it doesn't add efficiency to the BSC process. However, besides this, we see no other impact on our organisation.
SSE Energy Supply Limited	No	[None]
SSEPD	No	[None]
TMA Data Management Ltd	No	As a Supplier Agent we cannot raise Modifications.
Western Power Distribution	Yes	Impact would be limited to staff training on completing the new Standard Modification template.

Question 4: Will your organisation incur any costs in implementing CP1468?

Summary

Yes	No	Neutral/No Comment	Other
0	6	0	0

Responses

Respondent	Response	Rationale
British Gas	No	[None]
Npower Group	No	[None]
SSE Energy Supply Limited	No	[None]
SSEPD	No	[None]
TMA Data Management Ltd	No	[None]
Western Power Distribution	No	[None]

Question 5: Do you agree with the proposed implementation approach for CP1468?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	[None]
Npower Group	Yes	Yes, npower supports the proposed implementation date of 3rd November 2016, as part of the scheduled November 2016 release.
SSE Energy Supply Limited	Yes	[None]
SSEPD	Yes	[None]
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	[None]

Question 6: Do you have any further comments on CP1468?

Summary

Yes	No
1	5

Responses

Respondent	Response	Comments
British Gas	No	[None]
Npower Group	No	[None]
SSE Energy Supply Limited	No	[None]
SSEPD	No	[None]
TMA Data Management Ltd	Yes	In Attachment C contains the Ofgem approved Modification form template, section 8 Implementation contains a subsection on User Pay that clearly references Gas only industry. Could it be made clear in the template whether it applies to modifications for all codes and needs to be adapted appropriately If it does not apply to all codes, it should also be made clear.
Western Power Distribution	No	[None]