

Report Phase Consultation Responses



P383 'Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281'

This Report Phase Consultation was issued on 13 August 2019, with responses invited by 27 August 2019.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SMS Energy Services Limited	0/1	Supplier Agent
Engie	2/0	Generator, Supplier
Drax	1/0	Generator

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P383 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
SMS Energy Services Limited	Yes	No rationale provided.
Engie	Yes	We believes that P383 would better facilitate Applicable BSC Objectives (a), (c) and (d) compared to the current baseline.
Drax	Yes	It is noted that this Modification is required if the alternative to CMP280 or CMP281 are approved by the authority. In the event that the original CMP280 is approved and CMP281 is not approved then P383 is not required. In that context the modification better facilitates BSC applicable objective C in that it would better facilitate effective competition if the alternative to CMP280 or CMP281 are implemented as the modification is necessary to support implementation of the CUSC changes. The modification also has a positive impact on applicable objective D in that it enables the change to build upon existing processes and in train changes in an efficient and effective manner.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P383?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
SMS Energy Services Limited	Yes	No rationale provided.
Engie	Yes	The implement the intent of the Modification.
Drax	Yes	The redline changes deliver the intention of P383. The provisions relating to the use of the declaration provide assurance that charges will be appropriately applied.

Question 3: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
SMS Energy Services Limited	Yes	No rationale provided.
Engie	Yes	The date ensures co-ordination with the CUSC proposed implementation dates
Drax	Yes	We agree with the implementation date of 1 April 2021. In the event that the original solution for CMP280 is approved only we would see merit in a 1st April 2020 implementation.

Question 4: Do you agree with the Panel's initial view that P383 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
SMS Energy Services Limited	Yes	No rationale provided.
Engie	Yes	It has a material beneficial effect on competition
Drax	Yes	We agree with the panel that there are substantive impacts on competition and the modification should not be treated as self-governance.

Question 5: Do you have any further comments on P383?

Summary

Yes	No
1	2

Responses

Respondent	Response	Rationale
SMS Energy Services Limited	Yes	It should be noted that there is an investment cost for a number of agents including HHDA to meet the proposal. The dates proposed do provide enough time to deliver these system changes.
Engie	No	N/A
Drax	No	N/A