

CP Consultation Responses

CP1520 'Clarification to the Change of Ownership process in BSCP537'



This CP Consultation was issued on 9 September 2019 as part of CPC00797, with responses invited by 4 October 2019.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Western Power Distribution	4/0	Distributor
NPower	7/0	Supplier
Power Data Associates Ltd	0/1	Supplier Agent
Electricity North West Limited	1/0	Distributor
SP Distribution SP Manweb	1/0	Distributor
Scottish Power	1/0	Supplier
TMA	0/4	HHDC, HHDA, NHHDC and NHHDA
Utiliteam	0/1	Consultancy

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Western Power Distribution	✓	✓	✗	✓
NPower	✓	✗	✗	✓
Power Data Associates Ltd	✓	✓	✗	✓
Electricity North West Limited	✗	✓	✗	✓
SP Distribution SP Manweb	✓	✗	✗	✓
Scottish Power	✓	✗	✗	✓
TMA	✓	✗	✗	✓
Utiliteam	✓	✗	✗	✓

Question 1: Do you agree with the CP1520 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	We agree that the current BSCP 537 is confusing, therefore, this proposed CP adds clarity to the process of requalification on Change of Ownership.
NPower	Yes	It provides clarity on the change of ownership process
Power Data Associates Ltd	Yes	No rationale provided
Electricity North West Limited	No	It is important to recognise the two elements of the proposal – the first part (to clarify the change of ownership letter) is broadly sensible if there are concerns and/or confusion with the current version. We do not agree with the second element of the proposal to align the SMRA and UMSO roles with the other industry party processes for change of ownership. For these roles, the change of ownership is highly unlikely to be the trigger for a material compliance issue or increase in settlement risk. We would suggest that the risk associated with change of ownership only crystallises if subsequent changes in IT systems or processes occur (e.g. the new owners implement their own systems on the purchased party). This change to systems would trigger the existing requalification process if the materiality thresholds set out in BSCP537 were met. We do not believe that proposed extension is required as it creates little value for customers or improves the management of settlement risk.
SP Distribution SP Manweb	Yes	No rationale provided
Scottish Power	Yes	No rationale provided
TMA	Yes	No rationale provided
Utiliteam	Yes	No rationale provided

Question 2: Do you agree that the draft redlining delivers the CP1520 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	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
Western Power Distribution	Yes	The red-lining appears to deliver the proposed solution.
NPower	Yes	No rationale provided
Power Data Associates Ltd	Yes	No rationale provided
Electricity North West Limited	Yes	The current drafting delivers the proposed solution but we propose that the SMRA/UMSO extension is removed (as above).
SP Distribution SP Manweb	Yes	No rationale provided
Scottish Power	Yes	No rationale provided
TMA	Yes	No rationale provided
Utiliteam	Yes	No rationale provided

Question 3: Will CP1520 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	5	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	The impact to our organisation should this change be approved will be limited to internal documentation changes and therefore the impact will be minimal.
NPower	No	No rationale provided
Power Data Associates Ltd	Yes	Only if we were to go through a change of ownership – none planned!
Electricity North West Limited	Yes	Electricity North West currently holds the SMRA and UMSO roles. The proposal would therefore bring the change of ownership process into scope on any future sale of the business.
SP Distribution SP Manweb	No	No rationale provided
Scottish Power	No	No rationale provided
TMA	No	No rationale provided
Utiliteam	No	No rationale provided

Question 4: Will your organisation incur any costs in implementing CP1520?

Summary

Yes	No	Neutral/No Comment	Other
0	8	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No	As the impact to our organisation is limited to minor documentation changes, there will be a small one off cost but no ongoing costs incurred.
NPower	No	No rationale provided
Power Data Associates Ltd	No	No rationale provided
Electricity North West Limited	No	We would only incur costs associated with the change of ownership process if it occurred and was deemed to be material. These would be one off costs.
SP Distribution SP Manweb	No	No rationale provided
Scottish Power	No	No rationale provided
TMA	No	No rationale provided
Utiliteam	No	No rationale provided

Question 5: Do you agree with the proposed implementation approach for CP1520?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	We would agree that as there is already an ad hoc release proposed for December and as this change does not require any system changes, the implementation date is reasonable.
NPower	Yes	No rationale provided
Power Data Associates Ltd	Yes	No rationale provided
Electricity North West Limited	Yes	We agree that the proposed implantation date is appropriate.
SP Distribution SP Manweb	Yes	No rationale provided
Scottish Power	Yes	No rationale provided
TMA	Yes	No rationale provided
Utiliteam	Yes	No rationale provided

Question 6: Do you have any further comments on CP1520?

Summary

Yes	No
0	8

Responses

Respondent	Response	Comments
Western Power Distribution	No	
NPower	No	
Power Data Associates Ltd	No	
Electricity North West Limited	No	
SP Distribution SP Manweb	No	
Scottish Power	No	
TMA	No	
Utiliteam	No	

BSCP537

Respondent	Location	Comment
None		