

CP Consultation Responses

CP1438 'Clarification of information required for raising a Trading Dispute'



This CP Consultation was issued on 5 May 2015 as part of CPC00756, with responses invited by 29 May 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish and Southern Energy Power Distribution	1 / 0	Distributor
E.ON Energy Solutions	1 / 0	Supplier
TMA Data Management Ltd	0 / 1	Supplier Agent
British Gas	1 / 0	Supplier
IMServ	0 / 1	Supplier Agent
Western Power Distribution	4 / 0	Distributor
ScottishPower	1 / 1	Supplier, Supplier Agent
SSE Energy Supply Limited	1 / 0	Supplier
Npower Ltd	9 / 0	Generator, Supplier, Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Scottish and Southern Energy Power Distribution	✓	✗	✗	✓
E.ON Energy Solutions	✗	-	✗	✗
TMA Data Management Ltd	✓	✗	✗	✓
British Gas	✓	✗	✗	✓
IMServ	✓	✗	✗	✓
Western Power Distribution	✓	✓	✓	✓
ScottishPower	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✗	✓
Npower Ltd	✓	✗	✗	✓

Question 1: Do you agree with the CP1438 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	1	0	0

Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Yes	-
E.ON Energy Solutions	No	No. We would like clarity on its general intent as discussed in our answers below to Q.3.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
IMServ	Yes	It reduces the ambiguity in the process of raising a trading dispute.
Western Power Distribution	Yes	We agree in principle that a clarification to the requirements is of benefit, however, please note points below concerning the Red-Line document.
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
Npower Ltd	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1438 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	2	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
Scottish and Southern Energy Power Distribution	Yes	-
E.ON Energy Solutions	No	No. We have a concern that the intent of the proposed change to the drafting does not result in unintended consequences. For example, disputes sometimes arise not necessarily over a specific issue with the code or subsidiary document but that the overall intent of the code has been breached. We are concerned that the changes would mean that “general” disputes over more general interpretation issues may no longer be permitted to be raised and discussed.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
IMServ	Yes	-
Western Power Distribution	No	Whilst we agree that the change is of benefit, the proposed redline draft BSCP11 does not reflect the proposed change. The redline document shows the additional section to be completed in Form BSCP11/01 “BSC Section or Code Subsidiary Document which has been breached?”, however, it does not include the other additional section which will be required to be completed - “The nature of the alleged settlement error?”.
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-

Respondent	Response	Rationale
Npower Ltd	Yes	-

Question 3: Will CP1438 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	6	0	1

Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	No	-
E.ON Energy Solutions	-	We are concerned that the changes would mean that “general” disputes over interpretation may no longer be permitted to be raised and discussed. Disputes may arise due to a combination of circumstances that of themselves do not breach a specific section of the code, but may break the overall intent of the code to ensure accurate settlement. For example, a faulty metering case leads to settling on an EAC derived from an inaccurate Authorised Supply Capacity (ASC). The ASC is approximately ten times what it ought to be, due to a misunderstanding about the usage on site (the site itself is large but only a small percentage of it is actually used for anything except storage). Customer consumption then demonstrates the inaccuracy of the EAC and therefore of settlement charges. There is no section of the code which is specifically breached here, as the correct approach to HH faulty metering (according to BSCP502) is either to settle using actual data or to estimate using the ASC. However, the ASC in this case is based on inaccurate data, the settlement calculation is incorrect. This is a breach of the overarching principle of accurate settlement. It is important for parties to be able to raise disputes in these instances or to deal with similar scenarios such as incorrect CT ratios or dial multipliers.
TMA Data Management Ltd	No	-

Respondent	Response	Rationale
British Gas	No	-
IMServ	No	-
Western Power Distribution	Yes	Minor administrative changes
ScottishPower	No	-
SSE Energy Supply Limited	Yes	No significant changes required, this change provides clarity of process only.
Npower Ltd	No	-

Question 4: Will your organisation incur any costs in implementing CP1438?

Summary

Yes	No	Neutral/No Comment	Other
1	8	0	0

Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	No	-
E.ON Energy Solutions	No	No
TMA Data Management Ltd	No	-
British Gas	No	-
IMServ	No	-
Western Power Distribution	Yes	Minimal
ScottishPower	No	-
SSE Energy Supply Limited	No	-
Npower Ltd	No	-

Question 5: Do you agree with the proposed implementation approach for CP1438?

Summary

Yes	No	Neutral/No Comment	Other
8	1	0	0

Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Yes	-
E.ON Energy Solutions	No	No we require clarification on the intent of the red line text as highlighted in our answer to Q.3.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
IMServ	Yes	-
Western Power Distribution	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
Npower Ltd	Yes	-

Question 6: Do you have any further comments on CP1438?

Summary

Yes	No
1	8

Responses

Respondent	Response	Comments
Scottish and Southern Energy Power Distribution	No	-
E.ON Energy Solutions	No	-
TMA Data Management Ltd	No	-
British Gas	No	-
IMServ	No	-
Western Power Distribution	Yes	Please see comments on Red-Line text below.
ScottishPower	No	-
SSE Energy Supply Limited	No	-
Npower Ltd	No	-

BSCP11

Respondent	Location	Comment
Western Power Distribution	BSCP11/01 on the line above "BSC Section or Code Subsidiary Document which has been breached"	Suggest form BSCP11/01 would align better with the BSCP11 if the additional section – "Nature of the alleged Settlement Error" – was included.