

Report Phase Consultation Responses

P340 'Removal of References and Requirements Relating to the LCPD'

This Report Phase Consultation was issued on 16 May 2016, with responses invited by 27 May 2016.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SSE plc	6/0	Generator, Supplier, Interconnector User

P340
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Responses

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Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P340 should be approved?

Responses

Respondent	Response	Rationale
SSE plc	Yes	LCPD legislation has been superseded by IED legislation. It is therefore inefficient to retain an obligation within the BSC that references a legal framework that no longer exists. Removal of LCPD references will therefore better facilitate objective d) by removing a reporting obligation that cannot be enforced.

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P340?

Responses

Respondent	Response	Rationale
SSE plc	Yes	-

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

Responses

Respondent	Response	Rationale
SSE plc	Yes	-

Question 4: Do you agree with the Panel's initial view that PXXX should be treated as a Self-Governance Modification?

Responses

Respondent	Response	Rationale
SSE plc	Yes	There are no competition/distributional impacts associated with removing redundant obligations.

Question 5: Do you believe information relating to LCPs is sufficiently visible?

Responses

Respondent	Response	Rationale
SSE plc	Yes	-

Question 6: Do you believe any further change is needed, separate to P340 and taking into account the IED, to facilitate reporting of potentially price sensitive information relating to LCPs?

Responses

Respondent	Response	Rationale
SSE plc	No	Whilst we feel that LCP information is sufficiently visible through IED arrangements, any additional reporting requirement that others feel is necessary should be addressed in the first instance through the IED governance framework and not the BSC.

Question 7: Do you have any further comments on P340?

Responses

Respondent	Response	Rationale
SSE plc	Yes	To the extent that a BSC Party feels that new obligations are necessary within the BSC to retain an equivalent reporting obligation, then SSE believe that a new modification should be raised that frames a solution in the context of IED legislation, rather the delay the removal of LCPD references.