

CP Consultation Responses

CP1584‘Allow non-BSC Parties to raise Change Proposals, add a CP withdrawal process and remove BCA/PACA concept’

This CP Consultation was issued on 7 August 2023 as part of the August 2023 CPC Batch, with responses invited by 4 September 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Stark	1	Distributor, Supplier Agent
IMServ Europe Ltd	1	Supplier Agent
SSE Energy Supply Limited	1	Supplier
Siemens	1	Supplier Agent
Drax Group BSC Parties	1	Generator, Supplier, ECVNA, MVRNA
SMS Plc	1	Virtual Lead Party, Supplier Agent
National Grid Electricity Distribution	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Stark	✓	✗	✗	✓
IMServ Europe Ltd	✓	✓	✗	✓
SSE Energy Supply Limited	✗	✗	✗	✗
Siemens	✓	✗	✗	✓
Drax Group BSC Parties	✗	✓	✓	✗
SMS Plc	✓	✓	✗	✓
National Grid Electricity Distribution	✓	✓	✓	✓

Question 1: Do you agree with the CP1584 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

Responses

Respondent	Response	Rationale
Stark	Yes	None Given
IMServ Europe Ltd	Yes	<p>As well as addressing the current inconsistency in the raising of proposals between the Modification and the Change processes, this will facilitate improvements to specific processes by allowing those that manage and enact them (Party Agents) to raise Change Proposals – something that will become even more beneficial in the early days of MHHS.</p> <p>Whilst Party Agents have always been able to request a Party raise CPs on their behalf, in practice this has proven such a struggle for Independent Agents such as ourselves, that the effort (and very limited chance of success) has dissuaded any attempt on our part.</p>
SSE Energy Supply Limited	No	We do not agree that non-BSC Parties should be allowed to raise change proposals.
Siemens	Yes	None Given
Drax Group BSC Parties	No	<p>We do not support the proposed solution. Our primary reason is that Non-BSC Parties (e.g. Party Agents) could propose changes that have no impact on themselves but which result in changes to embedded industry processes and systems that materially impact BSC parties.</p> <p>A CP is a detailed proposal which is raised to amend Code Subsidiary Documents (CSDs) and/or BSC Systems but would not alter the BSC. We would therefore question why a non-BSC Party, that does not have access to BSC systems, and is not subject to costs of amending BSC systems should be able to raise CPs. Therefore, while we accept the rationale</p>

		<p>for non-BSC Parties to be able to raise BSC modifications, we don't see the same rationale/justification applying to CPs.</p> <p>We believe that the proposal is detrimental to objective c) 'promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity' because it imposes costs upon BSC Parties that are obliged to accede to the BSC without a contribution from non-BSC Parties who may have a vested interest in, and receive a competitive benefit from, a CP they propose.</p> <p>We also believe the proposal is detrimental to objective d) 'promoting efficiency in the implementation and administration of the balancing and settlement arrangements' because it will require Elexon resource to triage CPs raised by non-BSC Parties in order to ensure they are not frivolous or vexatious. This triage process is outside of the scrutiny of BSC Parties but is funded by them. Given the typically shorter timescales associated with CPs compared with modifications, an increase in CPs due to non-BSC parties could increase the costs of Elexon which are consequently borne by BSC Parties. We question if any analysis has been conducted by Elexon regarding the potential additional costs to administer this process.</p> <p>We note that CP1584 has been raised as a consequence of the Issue 102 workgroup but has not been subject to usual CP workgroup discussions, including provision of evidence regarding how proposed changes will increase efficiency of arrangements against applicable BSC objectives.</p> <p>We believe that the ability to raise CPs should be restricted to BSC Parties, who fund the arrangements and who may be materially impacted by changes to BSC systems, processes and CSDs.</p>
SMS Plc	Yes	None Given
National Grid Electricity Distribution	Yes	None Given

Question 2: Do you agree that the draft redlining delivers the CP1584 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	1	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
Stark	Yes	None Given
IMServ Europe Ltd	Yes	None Given
SSE Energy Supply Limited	Yes	Whilst we do not agree with the proposed solution, if implemented, the draft redlining does deliver it.
Siemens	Yes	None Given
Drax Group BSC Parties	Yes	None Given
SMS Plc	Yes	None Given
National Grid Electricity Distribution	No	<p>We agree that the draft redlining delivers the requirements to allow third parties to raise a CP, introduce a process to enable withdrawal of a CP and remove references to PCA/BACA, however, the draft redlining is also removing two definitions:</p> <p>“Qualification Service Provider – the organisation contracted by BSSCo to perform the duties set out in BSCP537” and</p> <p>“Release Strategy – a strategy, agreed by the BSC Panel for the delivery of changes to the BSC Systems as a result of approved modifications and changes”</p> <p>CP 1584 does not make any reference to the reason or justification for these two definitions to be removed and therefore, their removal should not be included within the redlining for this CP.</p>

Question 3: Will CP1584 impact your organisation?

Summary

High	Medium	Low	None	Other
0	1	2	3	1

Responses

Respondent	Response	Rationale
Stark	None	None Given
IMServ Europe Ltd	Other – ‘Yes’	Any impact would be beneficial and save on time and effort.
SSE Energy Supply Limited	None	No direct impacts from the CP, but if it is implemented then new CPs raised may impact us.
Siemens	None	No immediate impact, but there are potential long term benefits particularly to CVAMOA (see question 6).
Drax Group BSC Parties	Low	Given the nature of this CP, there are no associated system changes. However, CP1584 would create a risk that non-BSC Parties could propose changes which have no impact to them, but which materially impact our organisation’s systems and/or processes, increasing our costs.
SMS Plc	Medium	The ability as a non-BSCP Party to raise a CP is advantageous and brings Industry Change in line with RECCo
National Grid Electricity Distribution	Low	We would anticipate a Low impact primarily as there may be an increase in the volume of CPs being raised and requiring review and response.

Question 4: Will your organisation incur any costs in implementing CP1584?

Summary

High	Medium	Low	None
0	0	2	5

Responses

Respondent	Response	Rationale
Stark	None	None Given
IMServ Europe Ltd	None	This would create a saving – see response to 1 and 3.
SSE Energy Supply Limited	None	None Given
Siemens	None	None Given
Drax Group BSC Parties	Low	Although we would not expect to incur any direct costs in implementing CP1584, we would expect our costs to administer and review CPs to rise if there is an increase in the number of CPs. There could also be a cost associated with increased engagement given the potential for frivolous CPs. An increase in CPs will increase the workload and thus cost of BSC Parties to assess and review (and potentially implement) these changes together with associated costs to Elexon to administer this process.
SMS Plc	None	None Given
National Grid Electricity Distribution	Low	Unsure of any additional costs but if there were we would anticipate these being low and limited to purely additional resource allocation should the volume of CPs being raised for review and response increase significantly.

Question 5: Do you agree with the proposed implementation approach for CP1584?

Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

Responses

Respondent	Response	Rationale
Stark	Yes	None Given
IMServ Europe Ltd	Yes	None Given
SSE Energy Supply Limited	No	We do not agree that CP1584 should be implemented.
Siemens	Yes	None Given
Drax Group BSC Parties	No	We have no objections, if approved, for this CP to be implemented on 29 February 2024 as part of the standard February 2024 BSC Release. However, in line with our response to Question 1, we note that CP1584 has been raised as a consequence of the Issue 102 workgroup but has not been subject to usual CP workgroup discussions including provision of evidence regarding how proposed changes will increase efficiency of arrangements against applicable BSC objectives. We would also question, given the impacts to BSC wording, whether this should have been raised as a modification to the BSC rather than as a CP.
SMS Plc	Yes	None Given
National Grid Electricity Distribution	Yes	None Given

Question 6: Do you have any further comments on CP1584?

Summary

Yes	No
3	4

Responses

Respondent	Response	Comments
Stark	No	N/A
IMServ Europe Ltd	No	N/A
SSE Energy Supply Limited	Yes	<p>CP1584 is aiming to do three things which should have been the subject of separate CRs. We agree with the 2nd and 3rd aims of the CR regarding the withdrawal of CRs, and the processes replacing the PACA and BCA.</p> <p>However, we do not agree that non-BSC Parties should be allowed to raise CRs, as they are not contributing to BSC costs, and could raise changes that may benefit them, but which could negatively impact paying BSC Parties. The raising of a CP by a non-BSC Party has the potential to impact BSC Parties more than modifications as CPs impact working practices, business process, flows, etc., under the BSC and so we believe that non-BSC Parties should not be allowed to raise CPs.</p>
Siemens	Yes	<p>We are very supportive of this change. In the role of CVAMOA, we are a reasonably large market participant and yet have struggled in the past to persuade other parties to raise industry changes on our behalf. CP1584 will benefit CVAMOA by giving us the ability to raise and progress changes ourselves.</p>
Drax Group BSC Parties	Yes	<p>We are opposed to non-BSC Parties raising CPs, particularly given they incur no cost/impact as a consequence while otherwise burdening existing BSC Parties with a greater cost.</p> <p>However, we do support the proposed introduction of a method for a proposer to withdraw their CP in line with the existing capability to retract Modifications. For example, if a proposer chooses to relinquish their</p>

		lead on a proposed change, the ability to withdraw that CP would help to avoid wasted resource going forwards on the part of the proposer, Elexon and other industry parties. We would consider this ability to withdraw a CP to better facilitate BSC objective d) promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
SMS Plc	No	N/A
National Grid Electricity Distribution	No	N/A

BSCP40 ‘Change Management’

Respondent	Location	Comment
IMServ Europe Ltd	2.2 Definitions	Does the word “Proposer” which is featured earlier in the document need to be defined as it is in capitals.
National Grid Electricity Distribution	Section 2.2 List of Definitions	<p>“Qualification Service Provider – the organisation contracted by BSCCo to perform the duties set out in BSCP537”</p> <p>Why is this definition being removed?</p>
National Grid Electricity Distribution	Section 2.2 List of Definitions	<p>“Release Strategy – a strategy, agreed by the BSC Panel for the delivery of changes to the BSC Systems as a result of approved modifications and changes”</p> <p>Why is this definition being removed?</p>