

# CP Consultation Responses

## CP1544 'BSCCo Approved EFR Representative sign-off required for any EFR plan following escalation'



This CP Consultation was issued on 9 August 2021 as part of the August 2021 CPC Batch, with responses invited by 6 September 2021.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ	1	Supplier Agent (Meter Operator Agent (MOP) ((Half Hourly (HH) and Non Half Hourly (NHH))
Power Data Associates	1	Supplier Agent (Meter Administrator)
E.ON/Npower	2	Supplier, Supplier Agent
Scottish Power	1	Supplier

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
IMServ	✓	✓	✗	✓
Power Data Associates	✓	✓	✗	✓
E.ON/Npower	✓	✗	✗	✓
Scottish Power	✓	✗	✗	✓

## Question 1: Do you agree with the CP1544 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	The proposed approach recognises the different organisational models in place within organisations in the industry.
Power Data Associates	Yes	For the reasons in the report.
E.ON/Npower	Yes	We agree that the revised solution delivers the intention to ensure that stronger senior level oversight would be introduced by introducing the requirements for either a company director or an employee of management seniority with sufficient authority to be able to ensure delivery of the EFR plan. We are especially pleased to see that the revised solution ensures a fair and consistent approach to EFR replans across all types of Performance Assurance Parties.
Scottish Power	Yes	None.

## Question 2: Do you agree that the draft redlining delivers the CP1544 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
4	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
IMServ	Yes	None.
Power Data Associates	Yes	For the reasons in the report.
E.ON/Npower	Yes	None.
Scottish Power	Yes	None.

### Question 3: Will CP1544 impact your organisation?

#### Summary

High	Medium	Low	None
2	0	0	2

#### Responses

Respondent	Response	Rationale
IMServ	High	As a Party Agent, should we be placed in EFR, we would need to apply the proposed requirements however; we already follow the proposed approach.
Power Data Associates	High/Medium/ Low/None	Only if we ever get into EFR – which I have not and hope will never get there.
E.ON/Npower	None	We do not believe that this CP will impact our organisation on the basis that BSCP 538 Appendix A action plan control document already contains a field to provide senior manager committing to successful delivery of the EFR plan, which would be agreed with BSCCo and communicated within the initial EFR plan.
Scottish Power	None	None.

## Question 4: Will your organisation incur any costs in implementing CP1544?

### Summary

High	Medium	Low	None
0	0	0	4

### Responses

Respondent	Response	Rationale
IMServ	None	None.
Power Data Associates	None	None.
E.ON/Npower	None	None.
Scottish Power	None	None.

## Question 5: Do you agree with the proposed implementation approach for CP1544?

### Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	None.
Power Data Associates	Yes	None.
E.ON/Npower	Yes	None.
Scottish Power	Yes	We agree with the 4th November 2021 as this is the next schedule BSC release date.

## Question 6: Do you have any further comments on CP1544?

### Summary

Yes	No
0	3

### Responses

Respondent	Response	Comments
IMServ	No	None.
Power Data Associates	No	None.
E.ON/Npower	No	None.
Scottish Power	No	None.