

CP Consultation Responses

CP1567 'Creation of a new BSC Procedure (BSCP) for Assurance Information Requests (AIRs)'

This CP Consultation was issued on 8 August 2022 as part of the August 2022 CPC Batch, with responses invited by 2 September 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish Power	1	MOA
IMServ Europe Ltd	4	HH and NHH DC and DA
Western Power Distribution	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Scottish Power	✓	✗	✗	✓
IMServ Europe Ltd	✓	✓	✓	✗
Western Power Distribution	✓	✓	✓	✓

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Question 1: Do you agree with the CP1567 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None.
IMServ Europe Ltd	Yes	As a PAB member I support the formalization of this process, however as an industry participant I believe this needs to be refined before it is deemed acceptable and practical.
Western Power Distribution	Yes	Yes we agree that there should be a formal process under the BSC to enable the PAB to issue an Assurance Information Request to enable parties to understand their obligations in responding to that request.

Question 2: Do you agree that the draft redlining delivers the CP1567 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
1	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 Power	Yes	None.
IMServ Europe Ltd	No	<p>See specific comments below and general points here:</p> <ul style="list-style-type: none">Timescales – the timescales denoted are not practical for industry participants. It only requires for the recipient to be on holiday for 5 days and they have instantly failed in their part of the process. Holidays are often longer than 5 days. <p>Given the nature of the request, the fact that none of this information is critical and that it may require the involvement of multiple parties within an organization to provide, all timescales should be relaxed. Based on personal experience following the introduction of similar timescales in the Trading Dispute process, there have been several occasions where colleagues have massively over reacted to such requests in my absence and caused unnecessary disruption and wasted time in the business in attempting to service them within the quoted timescales. This is not efficient or required.</p> <p>The timescales used in the submission of EFR plans could be a better basis for this.</p> <ul style="list-style-type: none">Escalation process – what is the escalation process for unfulfilled requests, i.e. will another person at the participants company be contacted and what will be the outcome for participants for any unfulfilled requests.
Western Power Distribution	No	<p>2.2.2 Requires the PAP to acknowledge the Assurance Information Request. It does not however provide a confirmation that the information requested is able to be provided by</p>

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		<p>the PAP and if the PAP is able to provide the requested information within the given timeframe. Although the information and timeframe should be achievable, there should be a provision for the PAP to acknowledge that this is the case or advise that the information is not available and the reason why or that the timeframe cannot be achieved together with a reason why.</p> <p>3. Appendices</p> <p>Form BSCP5605/04 is incorrect. It currently states</p> <p>The PAP will provide the following details to the Delegated Authority in accordance with section 2.2.4 (a) and 2.2.6 (a):</p> <p>This should read</p> <p>The PAP Delegated Authority will provide the following details to the Delegated Authority PAP in accordance with section 2.2.4 (a) and 2.2.6 (a):</p> <p>Form BSCP5605/05 is incorrect. It currently states</p> <p>The PAP will provide the following details to the Delegated Authority in accordance with section 2.2.4 (b) and 2.2.6 (c):</p> <p>This should read</p> <p>The PAP Delegated Authority will provide the following details to the Delegated Authority PAP in accordance with section 2.2.4 (b) and 2.2.6 (c):</p>
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Question 3: Will CP1567 impact your organisation?

Summary

High	Medium	Low	None
0	0	2	1

Responses

Respondent	Response	Rationale
Scottish Power	None	None.
IMServ Europe Ltd	Low	We have always responded to any request therefore this will not create any additional work however the timescales, as currently described, will present business impact when BAU work needs to be interrupted.
Western Power Distribution	Low	There will be administration changes required in respect of updating working instructions. Ongoing impacts will be in respect of responding to any AIR.

Question 4: Will your organisation incur any costs in implementing CP1567?

Summary

High	Medium	Low	None
		2	1

Responses

Respondent	Response	Rationale
Scottish Power	None	None.
IMServ Europe Ltd	Low	See above response - no additional costs in terms of effort but consequential costs in terms of business impact.
Western Power Distribution	Low	Costs will be incurred implementing changes to working instructions. Ongoing costs will be incurred in respect of responding to any AIR

Question 5: Do you agree with the proposed implementation approach for CP1567?

Summary

Yes	No	Neutral/No Comment	Other
2	1	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None.
IMServ Europe Ltd	No	If my comments can be addressed before the Release date then yes, however I do not believe this is achievable – unfortunately.
Western Power Distribution	Yes	None.

Question 6: Do you have any further comments on CP1567?

Summary

Yes	No
1	2

Responses

Respondent	Response	Comments
Scottish Power	No	None.
IMServ Europe Ltd	Yes	We need this process to work and be respected and be effective, without causing unnecessary noise and administration, therefore I advocate mitigating the chances of it not working as much as is possible.
Western Power Distribution	No	None.

BSCP605

Respondent	Location	Comment				
Scottish Power	N/A	None.				
IMServ Europe Ltd	BSCP605 Section 1.2	<p><i>The below is a topic which I've recently discussed with Kat Highby for a different reason and she has agreed that the RER, viewed in isolation, isn't as explicit or complete for participants as we would want and nor is there currently a supporting document that provides a view of the hierarchy of risks or significance of the various controls.</i></p> <p>Comments on document:</p> <p>This below extract describes an approach which is not reflected in the RER itself, i.e.</p> <p><i>All the Settlement Risks identified are rated in terms of severity of impact and probability (including a weighting for the strength of controls).</i></p> <p>Whereas the RER uses the following categorization and it is not clear as to how this translates into the above description.</p> <table><tr><td>Impact</td><td>Impact band</td><td>Upper Impact</td><td>Volatility</td></tr></table>	Impact	Impact band	Upper Impact	Volatility
Impact	Impact band	Upper Impact	Volatility			
IMServ Europe Ltd	1.3 Main Users of the Procedure	In what way would the Data Transfer Service Provider use this procedure?				
IMServ Europe Ltd	1.4 Bullet point 1 General Scope of Work	Should we include REC PAB as a source of information prompting an AIR? Not sure whether this was intended to define all or whether it's a non-exhaustive list.				
IMServ Europe Ltd	2.1 Determination of scope of work for AIR	Suggest the empty "To" and "Method" boxes are populated				
IMServ Europe Ltd	2.2.1	At the time of request it may not be possible for a PAP to confirm that the relevant information is available				
IMServ Europe Ltd	2.2.1	Which contact addresses will be used in this step?				
Western Power Distribution	2.2.2	Requires the PAP to acknowledge the Assurance Information Request. It does not however provide a confirmation that the information requested is able to be provided by the PAP and if the PAP is able to provide the requested information within				

		<p>the given timeframe. Although the information and timeframe should be achievable, there should be a provision for the PAP to acknowledge that this is the case or advise that the information is not available and the reason why or that the timeframe cannot be achieved together with a reason why.</p>
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