

## Issue Consultation Responses

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### Issue 107 Review of BSC Section N - Clearing, Invoicing & Payment'

This Issue Consultation was issued on 23 June 2023, with responses invited by 14 July 2023.

#### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish Power	1	Supplier
SSE Plc	1	Generator, Interconnector User, Supplier
RWE Supply & Trading GmbH	1	Generator, Interconnector User, Supplier
British Gas	1	Supplier

Two respondents did not consent to their response being published.

**Question 1: If Option 1 (Single Bill) were to be introduced, would there be an impact on your organisation?**

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## Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

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## Responses

Respondent	Response
Scottish Power	Yes
SSE Plc	Yes
RWE Supply & Trading GmbH	Yes
British Gas	No

**Question 2: If Option 1 (Single Bill) were to be introduced, what level of system changes would it require?**

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**Summary**

High	Medium	Low	None
0	2	2	2

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**Responses**

Respondent	Response
Scottish Power	Low
SSE Plc	Medium
RWE Supply & Trading GmbH	Low
British Gas	-

**Question 3: If Option 1 (Single Bill) were to be introduced, what level of process change would it require?**

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## Summary

High	Medium	Low	None
0	2	2	2

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## Responses

Respondent	Response
Scottish Power	Medium
SSE Plc	Low
RWE Supply & Trading GmbH	Low
British Gas	-

**Question 4: Please provide your rationale for the Option 1 impacts, including any cost estimates (if appropriate)?**

**Responses**

Respondent	Response
Scottish Power	By implementing option 1 there would be a reduction in the administration required in reconciling the second invoice we receive on a daily basis
SSE Plc	<p>The extent of the cost/effort required would depend upon the extent of any changes to the file format of the invoice .dat files that are currently received and loaded into our back-office Settlement systems. The more changes to the file format, the greater the effort required to amend machine reader and database storage to capture and process the data. As the extent of change is not certain, we have exercised caution and opted for the mid-case when estimating the level of system change required, but it is likely to sit somewhere between Low and Medium effort.</p> <p>Process benefits would be expected to result from the increased automation however, reducing the daily effort required from team members.</p>
RWE Supply & Trading GmbH	If VAT was expected to be charged, the Advice Note in its current format could not be used for VAT purposes, because it does not meet the legal requirements of the structure of a VAT invoice.
British Gas	This would not change our validation processes

**Question 5: If Option 2 (Monthly Confirmation Notice) were to be introduced, would there be an impact on your organisation?**

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## Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

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## Responses

Respondent	Response
Scottish Power	Yes
SSE Plc	Yes
RWE Supply & Trading GmbH	No
British Gas	No

**Question 6: If Option 2 (Monthly Confirmation Notice) were to be introduced, what level of system changes would it require?**

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## Summary

High	Medium	Low	None
0	1	3	2

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## Responses

Respondent	Response
Scottish Power	Low
SSE Plc	Low
RWE Supply & Trading GmbH	None
British Gas	-

**Question 7: If Option 2 (Monthly Confirmation Notice) were to be introduced, what level of process change would it require?**

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## Summary

High	Medium	Low	None
0	2	2	2

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## Responses

Respondent	Response
Scottish Power	Medium
SSE Plc	Low
RWE Supply & Trading GmbH	None
British Gas	-



**Question 8: Please provide your rationale for the Option 2 impacts, including any cost estimates (if appropriate)?**

**Responses**

Respondent	Response
Scottish Power	This would result in us having to build a process to enable us to reconcile the monthly invoice.
SSE Plc	System changes should be less than Option 1, as less change to the invoice .dat file structure would be anticipated, which would require less change to machine readers and database structures.
RWE Supply & Trading GmbH	A monthly confirmation notice would be acceptable.
British Gas	This would not change our validation processes

## Question 9: What is your preferred option and why?

### Summary

Option 1 (Single Bill)	Option 2 (Monthly Confirmation Notices)
5	1

### Responses

Respondent	Response	Rationale
Scottish Power	Option 1	I believe that there is no requirement to produce a second advice note after settlement and that the original advice note is sufficient
SSE Plc	Option 1	Option 1 will require an upfront investment to change IT systems to handle the increased data set and changed file structures; but will pay for itself through improved efficiency in daily Settlement management in the long-run, by streamlining our current processes and minimising manual support tasks.
RWE Supply & Trading GmbH	Option 2	Advice Note cannot be used for VAT purposes in its current format.
British Gas	Option 1	This option will minimise the number of documents to be produced and stored.

**Question 10: Taking all things into consideration, would you support one or both of these options being implemented?**

**Summary**

I would support Option 1 (Single Bill)	I would support Option 2 (Monthly Confirmation Notice)	I would support either of these options	Other
4	1	1	0

**Responses**

Respondent	Response	Rationale
Scottish Power	I would support Option 1 (Single Bill)	As stated above I believe that there is no requirement to produce a second advice note after settlement and that the original advice note is sufficient
SSE Plc	I would support Option 1 (Single Bill)	We would prefer to see a change that increases automation, rather than shift a continued manual process to a single point of the month. Option 1 would result in long-term resource efficiency, Option 2 seems quite inefficient as it creates a peak in resource at certain times of the month.
RWE Supply & Trading GmbH	I would support Option 2 (Monthly Confirmation Notice)	See above
British Gas	I would support either of these options	Either option will reduce the number of notifications we receive on a daily basis

## Question 11: How long would you need to implement Option 1 (Single Bill)?

### Responses

Respondent	Response
Scottish Power	No time required
SSE Plc	Depends on the extent of the change, but typically 3-6 months.
RWE Supply & Trading GmbH	N/A
British Gas	We could implement within 14 days

## Question 12: How long would you need to implement Option 2 (Monthly Confirmation Notice)?

### Responses

Respondent	Response
Scottish Power	-
SSE Plc	1-3 months
RWE Supply & Trading GmbH	No comment
British Gas	We could implement within 14 days