

Assessment Procedure Consultation Responses

P332 'Revisions to the Supplier Hub Principle'

This Assessment Procedure Consultation was issued on 16 July 2021, with responses invited by 6 August 2021.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Drax Group BSC Parties (including Opus Energy and Haven Power)	Generator, Supplier, ECVNA, MVRNA
Centrica	Supplier
Callisto	HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA
SSE	Supplier
Stark	HHDC, NHHDC, HHDA, NHHDA
IMServ Europe Ltd	HH and NHH DC, DA and MOP
Power Data Associates Ltd	PDAL MA
ScottishPower	Supplier, DC/DA
Western Power Distribution	Distributor

P332
Assessment Consultation
Responses

10 August 2021

Version 1.0

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Question 1: Do you agree with the Workgroup's initial view that P332 does not better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
6	3	0	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	No	<p>We agree with the Proposer that the 'appointment' of Agents by Customers, outside of the Supplier hub principle, makes Supplier management of Agent performance and delivery of obligations within the BSC more difficult than managing Agents with whom it has a contract.</p> <p>We believe that P332 better facilitates Applicable BSC Objectives c) and d):</p> <p>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. The proposal better facilitates this objective on the grounds that customers should receive comparable levels of service regardless of whether their Agent is Customer or Supplier-appointed.</p> <p>Objective (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements. The proposal better facilitates this objective as the intent of the side letter is to allow Suppliers to enforce all applicable obligations of SVA Data Collectors specified in the BSC and relevant Balancing and Settlement Code Procedures (BSCPs) and Code Subsidiary Documents (CSDs). This should help Suppliers to manage performance of Agents with whom it does not have a contract leading to more consistent performance.</p>
Centrica	No	We disagree with the workgroups initial view that P332 does not better facilitate the Applicable BSC Objectives that the current baseline.

Respondent	Response	Rationale
		<p>We agree with the Proposer that Objective (c) would be better facilitated because the proposed solution for P332 will ensure Customers receive comparable levels of service regardless of whether their Agent is Customer preferred or Supplier preferred. In addition, P332 would mean that Suppliers are not disadvantaged commercially by Customers contracting directly with Agents.</p> <p>This proposal will also help improve accurate and timely billing for customers for example by ensuring hand held readings are attempted.</p>
Callisto	Yes	<p>We believe only BSC objectives c and d are applicable to the P332 solution. However, we do not believe objective c (competition) is changed by P332.</p> <p>We believe objective d is negatively impacted by P332 as it increases the complexity and administration of the BSC, particularly relating to agent qualification. Although the solution may provide additional mechanisms and incentives for agents to comply with BSC obligation, we believe sufficient mechanisms already exist within the BSC, for example through PAB, although these may not currently be fully employed.</p>
SSE	Yes	We do not believe that P332 better facilitates any of the Applicable BSC Objectives.
Stark	Yes	<p>We support the majority working group recommendation that P332 should be rejected. There has been no evidence to support any benefit to BSC Objectives. Consumer benefits of Customer preferred agents have been highlighted by Ofgem in response to this modification and the modification has always had a commercial aspect.</p> <p>Now that the MOA obligations have moved to the REC, the solution does not add anything to the obligations and provisions that already exist in the BSC.</p>
IMServ Europe Ltd	Yes	Agent obligations and the Supplier HUB processes are already clearly defined within the Code, along with a formal BSC process for dealing with any non-compliance. This proposal does not add any clarity to the requirements or change the process for dealing with non-compliance; therefore, it cannot better facilitate the Applicable BSC Objectives.

Respondent	Response	Rationale
		Conversely however it introduces an additional administrative exercise for multiple parties in the industry, ELEXON and the PAB, therefore detrimentally impacting Objective D, Promoting efficiency in the implementation of the balancing and settlement arrangements
Power Data Associates Ltd	Yes	<p>I attended the majority of workgroup discussions since the MOD was raised. Right from the initial meeting it was impossible to determine what problem this MOD was seeking to resolve. Over that period, I was particularly concerned about the impact on Meter Operators but over the last year that has been negated by the introduction of the REC which means that SVA Meter Operators, from Sept 2021, are no longer under the BSC governance.</p> <p>The debate over the many years was initially focused on metering issues. In 2019/2020 the debate highlighted some concerns with obligations for provision of communications equipment not being mandated in the BSC. I sought to raise a MOD on behalf of the AMO with the Panel in summer 2020 to clarify and resolve this point but based on Ofgem feedback (overlap with MHHS) I withdraw the modification.</p> <p>It is noticeable that in the last year the P332 discussion morphed from focusing on metering to focusing on Data Collectors.</p> <p>My view of the P332 is that it reflects some ambiguities and therefore differences of opinion in the BSC obligations. If the root cause of these different views is identified, then a focused MOD could be raised to address the specific ambiguity.</p> <p>P332 failed to be specific of the problem and of the proposed solution, on that basis, in my view, it should only have ever been raised as an Issue, not a modification. After debate in an Issue group tangible change could have emerged.</p> <p>Through the workgroup discussion no tangible evidence of problems was identified, the only evidence provided was anecdotal evidence. The contrary anecdotal evidence has not been given the same prominence in the final report.</p>

Respondent	Response	Rationale
ScottishPower	No	<p>ScottishPower believes that the proposal will better facilitate Applicable BSC Objectives c) and d) compared to current baseline.</p> <p>Making DCs' qualification dependent on compliance with the side letter provides incentive which are currently missing in many cases, particularly where a Supplier registers a customer with a CPA with whom the supplier has no contractual arrangement.</p> <p>The alternative argument that the arrangements are covered by commercial contractual arrangements between the Supplier and the Agent suffers from two fundamental weaknesses</p> <p>1) It requires that a Supplier puts in place contractual arrangements with every possible DC whom they might find appointed to their Supplier Hub by a customer. ScottishPower believes this itself is a barrier to entry for Suppliers.</p> <p>2) If the Supplier does not contract at the outset with all possible DCs and instead awaits an appointment request for a CPA DC then the Supplier finds itself having to contract with a DC who knows it is preferred by the Supplier's customer. This creates an uneven playing field on which the Supplier is at a commercial disadvantage to the customer's agent.</p>
Western Power Distribution	Yes	<p>Yes we agree with the Workgroup's view as there has been no quantifiable evidence provided to support a view that P332 would better facilitate the BSC Objectives than the current baseline.</p>

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P332?

Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	We agree the draft legal text delivers the intention of P332
Callisto	Yes	If this modification is approved draft legal text is correct.
SSE	Yes	No rationale provided
Stark	No	Agree that the draft legal text was amended to explain that the Agent must be appointed and registered in SMRS for this letter to apply, however; do not agree that the legal text delivers the intention as these are already BSC requirements for SVA agents.
IMServ Europe Ltd	Yes	No rationale provided
Power Data Associates Ltd	No	As stated in the response to Q1 the "intention" of the MOD has always been unclear.
ScottishPower	Yes	No rationale provided
Western Power Distribution	Yes	Yes the draft legal text in Attachment A delivers the intention of P332

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

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	1

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	An Implementation Date of 5 WDs after Ofgem approval would give DCs a 6-month period to sign the side letter before it takes effect.
Centrica	Yes	We agree with the proposed implementation date
Callisto	Yes	No rationale provided
SSE	Yes	Whilst we do not support the modification, if implemented we agree with the recommended date of implementation.
Stark	Not applicable	This proposal does not require a release & therefore no specific implementation date.
IMServ Europe Ltd	Yes	No rationale provided
Power Data Associates Ltd	No	Not clear what this question is seeking as the recommendation is not to progress with the Modification
ScottishPower	Yes	We agree with 5 Working Days (WDs) after Ofgem approval subject to no appeal being raised. And that all Qualified SVA HH & NHH Data Collectors will be required to sign the side letter within 6 months of the P332 Implementation Date.
Western Power Distribution	Yes	Yes we agree with the Workgroup's recommended Implementation Date.

Question 4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P332 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	We agree with the workgroup that there are no other potential alternatives
Callisto	None	We do not have an alternative, but there may be others not considered.
SSE	Yes	No rationale provided
Stark	Yes	No rationale provided
IMServ Europe Ltd	Yes	No rationale provided
Power Data Associates Ltd	Yes	As stated in response to Q1 there are other improvements to remove ambiguity that have been raised during the extended debate of P332 but none that could reasonably be included under P332.
ScottishPower	Yes	No rationale provided
Western Power Distribution	Yes	We agree that there are no other potential Alternative Modifications within the scope of P332 which would better facilitate the Applicable BSC Objectives

Question 5: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
5	3	0	1

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	The 'appointment' of Agents by Customers, outside of the Supplier hub principle, can make it more difficult for Suppliers than managing Agents with whom it has a contract. For example, influencing Settlement performance due to the lack of a contractual relationship with DCs.
Centrica	Yes	We agree with the Workgroups assessment of the impact on the BSC Settlement Risks
Callisto	N/A	We were not clear from the report how the P332 solution would impact settlement risks.
SSE	No	We do not believe that P332 would impact settlement risks as it unlikely to change the behaviour of DCs, and suppliers will not impose any breaches to the side letter as the costs and efforts of going to court would be too high.
Stark	No	<p>There is no evidence to suggest that the proposed letter would have a positive impact on the current Settlement risks.</p> <p>The BSC Settlement risks highlighted were associated with a Risk event rather than individual risks.</p> <p>The individual risks that could be impacted are associated with metering and accuracy of meter technical details, which will now be facilitated under the REC Performance Assurance Framework.</p>
IMServ Europe Ltd	No	<p>The assessment of risks is hypothetical based on a worst-case scenario using the anecdotal evidence provided.</p> <p>The risks noted, relating to the collection of data, need to be mitigated through commercial contracts between agents and suppliers, as agents are not directly subject to any settlement performance standards. The proposed letter is insufficient to</p>

Respondent	Response	Rationale
		replace such commercial arrangements and therefore will have no impact on settlement risks.
Power Data Associates Ltd	Yes	As is apparent from these comments, it is not apparent to demonstrated how implementing this change could improve settlement. Even the anecdotal comments have not been tested to see if they would get resolved through the existence of a side letter.
ScottishPower	Yes	No rationale provided
Western Power Distribution	Yes	We agree with the Workgroup's assessment that as no quantifiable evidence has been able to be provided it is difficult to quantify the impact of P332 against the BSC Settlement Risks.

Question 6: Do you agree with the Workgroup’s assessment that P332 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
6	0	3	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	As BSC Section J 3.3 is impacted, the EBGL process will need to be followed.
Callisto	None	We have no comment to make on this question.
SSE	Yes	No rationale provided
Stark	Yes	No rationale provided
IMServ Europe Ltd	Yes	No rationale provided
Power Data Associates Ltd	None	No comment
ScottishPower	No comment	No rationale provided
Western Power Distribution	Yes	No rationale provided

Question 7: Do you have any comments on the impact of P332 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
0	6	3	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	No	No rationale provided
Centrica	No	No comment
Callisto	None	We have no comment to make on this question.
SSE	No	No rationale provided
Stark	No	No rationale provided
IMServ Europe Ltd	No	No rationale provided
Power Data Associates Ltd	None	No comment
ScottishPower	No comment	No comment
Western Power Distribution	No	No rationale provided

Question 8: Will P332 impact your organisation?

Summary

High	Medium	Low	None	Other
0	2	2	5	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	The proposed side letter should make it easier for Suppliers to enforce all applicable obligations of SVA Data Collectors specified in the BSC and relevant Balancing and Settlement Code Procedures (BSCPs) and Code Subsidiary Documents (CSDs). This should help Suppliers to manage performance of Agents with whom it does not have a contract leading to more consistent performance.
Centrica	No	We do not believe we will need to amend any systems, documents or processes as a result of implementing P332
Callisto	Yes	Review and renegotiate current contractual agreements with Suppliers. Review end of contract processes and amend contractual arrangements where needed. Data checks for missing de-appointments.
SSE	No	No rationale provided
Stark	Yes	Minimal impact. Only from the perspective of the requirement as a qualified agent, to sign the letter. We would not see any changes required to our current BSC obligations.
IMServ Europe Ltd	Yes	As an Agent, we would be required to sign the letter, which could require legal approval from our Parent Company, which cannot be assumed, would be given. Additionally we would need to review, and potentially amend, contracting processes in which the supplier often appoints us to sites, under a letter of intent, pending the formal contract being signed. We would need to understand whether this practice could leave us exposed and if so, whether we need to reject such appointments, thus impacting suppliers.
Power Data Associates Ltd	No	I have not bothered responding as AMO as meter operators are now out of scope. But I provide comments as PDAL, after spending many hours

Respondent	Response	Rationale
		participating as 'an industry expert' in P332 meetings.
ScottishPower	No	No rationale provided
Western Power Distribution	No	As a DNO P332 will not impact our organisation.

Question 9: Will your organisation incur any costs in implementing P332?

Summary

Solution	High	Medium	Low	None	Other
Proposed	0	0	1	7	1

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	No	No rationale provided
Centrica	No	No rationale provided
Callisto	None	At this point we have no response to make to this question.
SSE	No	No rationale provided
Stark	No	No rationale provided
IMServ Europe Ltd	Yes	Yes – some amendments to contractual, appointment and potentially billing processes.
Power Data Associates Ltd	N/A	Not applicable
ScottishPower	None	No rationale provided
Western Power Distribution	No	As a DNO P332 will not impact our organisation therefore no costs will be incurred

Question 10: How long (from the point of approval) would you need to implement P332?

Summary

0-6 months	6-12 months	>12 months	Other
4	0	0	5

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	The proposed implementation date of 5 WDs after Ofgem approval would give DCs a 6-month period to sign the side letter before it takes effect. This should provide sufficient lead time for implementation.
Centrica	None	No impact
Callisto	6 months	The timescales proposed for implementation combined with the 6 months to get the side letter signed seem to be appropriate.
SSE	N/A	No rationale provided
Stark	Minimal time	Would be no reason to delay signing within timelines, should it be approved, however we feel it should be rejected.
IMServ Europe Ltd	None	We are unable to provide a response to this question - please see the response to Q8.
Power Data Associates Ltd	N/A	Not applicable
ScottishPower	5 working days	As per answer to question 3
Western Power Distribution	N/A	As P332 will not impact our organisation we feel this question would be better answered by HH and NHH DC's and Suppliers

Question 11: Do you agree with the Workgroup that the solution should apply to all SVA HH & NHH DCs?

Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	We agree that the solution should apply to both SVA HH and NHH DCs
Callisto	Yes	No rationale provided
SSE	No	We do not believe the modification should be implemented and, therefore, should not apply to any SVA DCs.
Stark	No	If this modification were approved, we would agree; however, we support the overall workgroup recommendation that P332 should be rejected. As the original suggestion that Customer preferred agents were the issue has not been sufficiently evidenced it is only appropriate that any solution should apply to all SVA HH & NHH DC's with the obvious acknowledgement that the scope changed significantly with the move of SVA HH & NHH MOA to the REC, & the implication that there is no evidenced distinction for Customer preferred agents.
IMServ Europe Ltd	No	There is no factual evidence to justify this – see response to Q14.
Power Data Associates Ltd	No	I do not support the need to change anything
ScottishPower	Yes	ScottishPower would like to see the side letter apply to Data Aggregators too.
Western Power Distribution	Yes	If P332 were to be approved, we feel that a consistent approach should be adopted to ensure a simplified management of the requirement to sign a side letter and therefore P332 should apply to all SVA HH and NHH DC's.

Question 12: Do you agree with the obligations that the Workgroup are placing on SVA HH & NHH DCs in the side letter?

Summary

Yes	No	Neutral/No Comment	Other
4	5	0	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	We agree with the obligations that are being placed on SVA HH and NHH DCs in the side letter as this will ensure Customers receive comparable levels of service regardless of whether their Agent is Customer preferred or Supplier preferred. In addition, the obligations would mean that Suppliers are not disadvantaged commercially by Customers contracting directly with Agents.
Callisto	Yes	If this modification is approved these obligations are correct.
SSE	No	We do not agree that any obligations should be placed on SVA HH & NHH DCs.
Stark	No	Disagree as it is recognised that these are existing BSC obligations towards which the letter will not make any impact in resolving contractual issues Supplier's may have with specific agents, which will only be resolved by direct communications. There was also the suggestion that Customers would benefit from this letter due to perceived fairer treatment being given to all appointments equally, however, should that be the case the issue would not be resolved by this letter.
IMServ Europe Ltd	No	Agent obligations and the Supplier HUB processes are already clearly defined within the Code, along with a formal BSC process for dealing with any non-compliance. This proposal does not add any clarity to the requirements or change the process for dealing with non-compliance, therefore the letter serves no additional purpose.

Respondent	Response	Rationale
Power Data Associates Ltd	No	I do not believe the changes will make any difference to settlement
ScottishPower	Yes	No rationale provided
Western Power Distribution	No	We understand the obligations that the Workgroup are placing on SVA HH & NHH DCs in the side letter however, we have reservations as to the benefit to the industry that the side letter will achieve. P332 was raised to address an issue of non-performance by Customer Preferred Agents and we appreciate the issues that have been raised by the proposer, however, the impact to settlements based on solely non-performance by Customer Preferred Agents has not been able to be quantified so it is unclear whether there will be any benefit against the BSC Obligations by the introduction of a side letter and the obligations being placed on SVA HH and NHH DCs in the side letter.

Question 13: Do you agree with the Workgroup that the draft side letter in Attachment B delivers the intention of P332?

Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

Responses

Respondent	Response	Rationale
Drax Group BSC Parties (including Opus Energy and Haven Power)	Yes	No rationale provided
Centrica	Yes	We agree that draft side letter B delivers the intention of P332
Callisto	No	We believe the side letter is not clear enough that if a Party Agents notifies a supplier of an mpan where they should be de-appointed, e.g. because of the end of a contract, the obligation in the side letter do not apply. We believe this is critical as a party agent has no way of initiating their de-appointment other than requesting the supplier to de-appointment them.
SSE	Yes	Whilst we do not support P332, we agree that the draft side letter delivers its intent.
Stark	No	Within the reduced scope of the original modification the Proposer is seeking to ensure that Suppliers have a route to better manage Agents with whom they do not have a direct contract, whilst maintaining the Supplier hub principle. There remains insufficient evidence to suggest that the draft side letter would deliver this intention.
IMServ Europe Ltd	No	Please see the marked up version returned with this response denoting changes proposed by our Legal Team.
Power Data Associates Ltd	No	As said several times I do not know what the intention of P332 was, therefore it is impossible to determine if this achieves the intention of P332
ScottishPower	Yes	No rationale provided
Western Power Distribution	Yes	We believe that the draft side letter in Attachment B delivers the intention of P332, however we are

Respondent	Response	Rationale
		unable to provide any comment on the legal content of the letter.

Question 14: Do you have any further comments on P332?

Summary

Yes	No
6	3

Responses

Respondent	Response
Drax Group BSC Parties (including Opus Energy and Haven Power)	No further comments
Centrica	No further comments
Callisto	No further comments
SSE	We believe that the implementation of P332 would create a lot of unnecessary and burdensome administration, and would deliver no benefit. Also, given the planned timescale of MHHS implementation, it would only be in place for a limited amount of time.
Stark	<p>Whilst we have no problem in principle with the concept of the letter, we still do not see how this will achieve the desired impact & support the majority working group recommendation that P332 be rejected.</p> <p>All that the letter is ensuring is that DC agents who currently perform will continue to do so.</p> <p>In principle, in lieu of an actual contract the letter may provide incentive to arrange an actual contract, however, there has been insufficient evidence to suggest this would be a solution to the perceived problem.</p> <p>During the PAF review there was support for greater transparency of the PAF monitoring information. This could allow Suppliers and Customers to make more informed judgments in selecting their agents & by publishing the information it will encourage poor performers to improve in areas that Supplier's perceive they have no influence due to lack of commercial arrangements.</p> <p>We also have a concern that, should the letter be approved, it could be used to provide Suppliers with a means to influence Customers against using their preferred agents.</p>
IMServ Europe Ltd	There is no actual description or quantification of the process failings that this modification is seeking to address: there is no factual description of scope, scale and impact and whether the issues are local to specific parties only. Therefore, it has not been established whether there is any failing of the market processes or

Respondent	Response
	<p>whether this is a failing of commercial processes, for some parties only, outside of the BSC.</p> <p>CPAs have been a part of the Market for many years: their existence cannot and should not be assumed to lead to issues and settlement impact.</p> <p>Whilst some evidence has been included, or referred to, in the consultation, this is anecdotal rather than factual. However, factual evidence is available through the BSC Audit, as the agent processes, which have been noted, are all scrutinised on an annual basis by the BSC auditor. This review also considers the cause of any failure on an individual mpan basis: to-date the factual evidence is that there has not been any non-compliance identified which is the result of the agent being appointed by the customer, i.e. a CPA.</p> <p>In all our agent roles at IMServ we have a significant number of CPA type appointments; however, the mpans under these arrangements are dealt with in the same way as those in which there is a direct supplier relationship. To be clear, there is no way of distinguishing these mpans in any of our internal systems therefore the service is the same for all. We run multiple management reports on processes and settlement performance and again, this is by total portfolio as opposed to contract type. Indeed, some of the suppliers with the highest settlement performance (over industry standard) have a large proportion of CPA sites.</p> <p>This is proof that the current industry processes are adequate and no change is required other than better use of the existing processes for dealing with any valid non-compliance.</p>
Power Data Associates Ltd	This is an example of a Modification that was not well drafted or explicit in defining the problem or the potential solution. The BSC change team and the BSC Panel should consider the effort that has been expended and learn any lessons to ensure there is sufficient rigor in approving any further Modifications
ScottishPower	ScottishPower would like to see whether workgroup votes were divided on partisan grounds (with Suppliers for and Agents against). Members of workgroups are not supposed to vote on partisan grounds.
Western Power Distribution	In addition to our concerns in respect of the benefit to industry as per our comments above, we also have concerns about the changes required to Section J. This section is included in the BSC consequential changes for REC v3.0 – would this P332 if approved require assessment by REC Change Board?