

Report Phase Consultation Responses



P414 'Allowing a Party to Withdraw from the BSC and transfer outstanding liabilities to another Party'

This Report Phase Consultation was issued on 15 October 2020, with responses invited by 16 November 2020.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
E.ON Energy Solutions	Supplier
ESB	Generator
Shell Energy Supply UK	Supplier

Question 1: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P414?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We support the panels recommended redlining changes and feel that will deliver the solution proposed under this Modification.
ESB	Yes	None provided
Shell Energy Supply UK	Yes	The redline changes deliver the intent of P414.

Question 2: Do you agree that the redlined changes to BSCP65 deliver the intention of P414?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We believe the procedure as outlined will deliver the intention of P414.
ESB	Yes	None provided
Shell Energy Supply UK	Yes	The redline changes deliver the intent of P414.

Question 3: Do you agree with the Panel's initial unanimous view that P411 does better facilitate Applicable BSC Objective (d) than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	None provided
ESB	Yes	None provided
Shell Energy Supply UK	Yes	P414 will help to facilitate the orderly exit of parties from the BSC.

Question 4: Do you agree with the Panel's initial unanimous recommendation that P414 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	None provided
ESB	Yes	This will allow for a more efficient process. It gives the option for parties to withdraw earlier while maintaining the integrity of the settlement's prices. It will allow parties to send the correct signals to market sooner and to cut unnecessary costs.
Shell Energy Supply UK	Yes	P414 will help to facilitate the orderly exit of parties from the BSC.

Question 5: Do you agree with the Panel's initial consideration that P414 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
2	0	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	None provided
ESB	Yes	None provided
Shell Energy Supply UK	N/A	We have not considered whether the proposed changes impact the European Electricity Balancing Guideline.

Question 6: Do you have any comments on the impact of P414 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	No	None provided
ESB	No	None provided
Shell Energy Supply UK	No	We have not considered whether the proposed changes impact the European Electricity Balancing Guideline.

Question 7: Will P414 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	No	E.ON does not see any immediate impact on our organisation because of P414, however there may be future benefits to E.ON if P414 is approved.
ESB	No	None provided
Shell Energy Supply UK	No	None provided

Question 8: Will your organisation incur any costs in implementing P414?

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	No	None provided
ESB	No	None provided
Shell Energy Supply UK	No	None provided

Question 9: Do you agree with the Panel's proposed Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We do not believe this Modification materially change system or processes; we also do not believe that the Modification presents any new risks to settlement.
ESB	Yes	None provided
Shell Energy Supply UK	Yes	We can see no reason to delay implementation.

Question 10: Do you agree with the Panel's initial view that P414 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
2	0	1	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	None provided
ESB	Yes	None provided
Shell Energy Supply UK	N/A	We do not have a view on whether P414 should be treated as a Self-Governance Modification.

Question 11: Do you have any further comments on P414?

Summary

Yes	No
1	2

Responses

Respondent	Response
ESB	<p>ESB GT is supportive of this Modification. We believe that the principle behind the Modification is a good one – to allow a Party to withdraw earlier while maintaining the integrity of the settlement runs.</p> <p>However, we have one comment. ESB GT does not believe that aligning with the novation process already in the code is enough of a justification for not having a right of appeal. ESB GT is of the view that there should be an opportunity to appeal or resubmit if rejected by the panel. ESB GT suggests that a route of appeal is included, even if only to the panel/board of Elexon.</p>