

Assessment Procedure Consultation Responses

P425 'Amendment to the definition of Shared SVA Meter Arrangement'

This Assessment Procedure Consultation was issued on 18 March 2022, with responses invited by 7 April 2022.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
E.ON/Npower	Supplier
IMServ Europe Ltd	Supplier Agent: HHDC
Emergent Energy Systems Ltd.	Licence exempt operator

P425
Assessment Consultation
Responses

8 April 2022

Version 1.0

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Question 1: Do you agree with the Workgroup's initial view that P425 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON/Npower	Yes	We have proposed this change because we believe that the requirement for two or more Suppliers to be involved in a Shared SVA Metering Arrangement adds unnecessary complexity for any sites considering making use of these arrangements, as it is a consequence of existing work arounds that adds complexity and in turn potential for settlement error to occur.
IMServ Europe Ltd	Yes	-
Emergent Energy Systems Ltd.	Yes	<p>The current arrangements prevent a single supplier from competing for both customer loads involved in a shared metering arrangement, this limiting competition for the customer loads.</p> <p>There is no obvious rationale why the arrangement has specified been to restrict one supplier from serving both loads, except perhaps an oversight in the drafting when shared metering arrangements were originally introduced.</p>

Question 2: Do you agree with the Workgroup that the draft legal text in Attachments A and B delivers the intention of P425?

Summary

Yes	No	Neutral/No Comment	Other
2	0	1	0

Responses

Respondent	Response	Rationale
E.ON/Npower	Yes	We agree that the draft legal text delivers the intent of P425.
IMServ Europe Ltd	Yes	Section K 2.5.4.a is a little clumsy. It might be better as 'Where multiple Suppliers are present then the Suppliers shall ensure that each is informed of each other's identity by the SVA Customer or (as the case may be) SVA Generator' or you could prefix or suffix the whole thing with 'where applicable'
Emergent Energy Systems Ltd.	-	-

Question 3: Do you agree with the Workgroup that the amendments to the Code Subsidiary Documents in Attachment C deliver the intention of P425?

Summary

Yes	No	Neutral/No Comment	Other
2	0	1	0

Responses

Respondent	Response	Rationale
E.ON/Npower	Yes	We agree that the CSD amendments deliver the intent of P425.
IMServ Europe Ltd	Yes	In BSCP550.2.1.2 Information Required 'Suppliers' should be 'Supplier(s)' In BSCP550 4.2.2 'Supplieris' should be 'Supplier is'
Emergent Energy Systems Ltd.	-	-

Question 4: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON/Npower	Yes	-
IMServ Europe Ltd	Yes	-
Emergent Energy Systems Ltd.	Yes	This should be a simple modification to implement and so it should be possible to implement it quickly.

Question 5: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P425 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
E.ON/Npower	Yes	-
IMServ Europe Ltd	Yes	-
Emergent Energy Systems Ltd.	Yes	-

Question 6: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
1	0	2	0

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	Yes	-
Emergent Energy Systems Ltd.	-	-

Question 7: Do you agree with the Workgroup's assessment that P425 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
1	0	2	0

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	Yes	-
Emergent Energy Systems Ltd.	-	-

Question 8: Will P425 impact your organisation?

Summary

High	Medium	Low	None	Other
0	0	1	0	2

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	Low	-
Emergent Energy Systems Ltd.	-	-

Question 9: Will your organisation incur any costs in implementing P425?

Summary

High	Medium	Low	None	Other
0	0	0	1	2

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	None	No additional costs beyond those currently incurred through supporting BSCP550
Emergent Energy Systems Ltd.	-	-

Question 10: What will the ongoing cost of P425 be to your organisation?

Summary

High	Medium	Low	None	Other
0	0	0	1	2

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	None	No additional costs beyond those currently incurred through supporting BSCP550
Emergent Energy Systems Ltd.	-	-

Question 11: How long (from the point of approval) would you need to implement P425?

Summary

0-6 months	6-12 months	>12 months	Other
1	0	0	2

Responses

Respondent	Response	Rationale
E.ON/Npower	-	-
IMServ Europe Ltd	None	-
Emergent Energy Systems Ltd.	-	-

Question 12: Do you have any further comments on P425?

Summary

Yes	No
0	3

Responses

Respondent	Response
E.ON/Npower	-
IMServ Europe Ltd	-
Emergent Energy Systems Ltd.	-