

Report Phase Consultation Responses

P454 ‘Removal of BSC obligations to provide BMRS Data via TIBCO and the High Grade Service’

This Report Phase Consultation was issued on 15 November 2023, with responses invited by 29 November 2023.

Consultation Respondents

Respondent	Role(s) Represented
Drax	Generator, Supplier, ECVNA, MVRNA
RWEST	Generator, Supplier
Confidential Response	Non-Physical Trader

E L E X O N

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

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Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P454 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	Our comments are in line with the assessment procedure consultation with the additional that equivalent or better service is maintained until any transition is completed.
RWEST	Yes	Agree with principle.
Non-Physical Trader – Confidential Response	Yes	-

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P454?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	Our comments are in line with the assessment procedure consultation.
RWEST	Yes	Just sensible.
Non-Physical Trader – Confidential Response	Yes	-

Question 3: Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P454?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	Our comments are in line with the assessment procedure consultation.
RWEST	Yes	Just sensible
Non-Physical Trader – Confidential Response	Yes	-

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

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	We note the implementation date is five working days following an Ofgem decision. We trust this would lead to the transition of the service over a suitable delivery period as outlined in the modification.
RWEST	Yes	-
Non-Physical Trader – Confidential Response	Yes	-

Question 5: Do you agree with the Panel's initial view that P454 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	We agree with this assessment given the material impact to systems and processes.
RWEST	Yes	-
Non-Physical Trader – Confidential Response	Yes	-

Question 6: Do you agree with the Panel's initial recommendation that P454 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
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	No further comment.
RWEST	Yes	-
Non-Physical Trader – Confidential Response	Yes	-

Question 7: Do you agree with the identified consumer benefits?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	We note that assumed consumer benefits are purely qualitative within the report.
RWEST	Yes	-
Non-Physical Trader – Confidential Response	Yes	-

Question 8: Do you have any further comments on P454?

Summary

Yes	No
1	2

Responses

Respondent	Response	Rationale
Drax	Yes	<p>The removal of the obligation is the start of the process and we trust that Elexon will not decommission TIBCO service until such time as all current users of the solution are satisfied with the replacement Insights Solution. We would also note that replacement of the service following the legal text implementation has not been fully scoped. We estimate that it will take a minimum of six months, assuming that the replacement service meets all of the capabilities of the current service, including:</p> <ul style="list-style-type: none">• Scaling of the Insights Solution is made to ensure current high grade response times are maintained• ALL transaction types, currently supported by the TIBCO service are available in the Insights Solution• An historic data service is available, replicating capability within current TIBCO service (i.e. current IRIS service is restricted to 3 days for a specific API method)
RWEST	No	-
Non-Physical Trader – Confidential Response	No	-