

Report Phase Consultation Responses

P455 ‘On-Site Aggregation as a method to facilitate Third Party Access’

This Report Phase Consultation was issued on 20 March 2024, with responses invited by 19 April 2024.

E L E X O N

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
BUUK	Independent Distributor
ENGIE	Supplier
Siemens	Supplier Agent
Stark	Distributor, Supplier Agent
SMS Plc	Supplier Agent

P455
Report Phase Consultation
Responses

9 May 2024

Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P455 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

Responses

Respondent	Response	Rationale
BUUK	No	We do not feel that this has been evidenced comprehensively and cannot be without a full costs/benefit analysis. For example, what is the impact to the 300k+ consumers being served by a private network and license exempt suppliers?
ENGIE	Yes	
Siemens	Yes	
Stark	Yes	
SMS	Yes	

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P455?

Summary

Yes	No	Neutral/No Comment	Other
4	0	1	0

Responses

Respondent	Response	Rationale
BUUK	n/a	
ENGIE	Yes	
Siemens	Yes	
Stark	Yes	
SMS	Yes	

Question 3: Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P455?

Summary

Yes	No	Neutral/No Comment	Other
4	0	1	0

Responses

Respondent	Response	Rationale
BUUK	n/a	
ENGIE	Yes	
Siemens	Yes	
Stark	Yes	
SMS	Yes	

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

Summary

Yes	No	Neutral/No Comment	Other
3	1	1	0

Responses

Respondent	Response	Rationale
BUUK	n/a	
ENGIE	Yes	
Siemens	No	The happy path (authority decision on or before 29/06/24) is achievable but if the decision is after 06/07/24 the 5 working day lead time may be difficult. One option gives 23+ days whilst the latter only gives 5 working days but in either case the quantity of work is no different.
Stark	Yes	
SMS	Yes	

Question 5: Do you agree with the Panel's initial view that P455 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
BUUK	Yes	
ENGIE	Yes	
Siemens	Yes	
Stark	Yes	
SMS	Yes	

Question 6: Do you agree with the Panel's initial recommendation that P455 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
BUUK	Yes	
ENGIE	Yes	
Siemens	Yes	Erring on the side of caution given Elexon's recommendations. The month consultation with EBGL would confirm the impact which may be better than assuming impact but with a neutral impact.
Stark	Yes	
SMS	Yes	

Question 7: Do you have any comments on the impact of P455 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
0	5	0	0

Responses

Respondent	Response	Rationale
BUUK	No	
ENGIE	No	
Siemens	No	
Stark	No	
SMS	No	

Question 8: Do you agree with the identified consumer benefits?

Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

Responses

Respondent	Response	Rationale
BUUK	No	We do not feel that this has been evidenced comprehensively and cannot be without a full costs/benefit analysis. For example, what is the impact to the 300k+ consumers being served by a private network and license exempt suppliers?
ENGIE	Yes	
Siemens	Yes	
Stark	Yes	
SMS	Yes	

Question 9: Do you have any further comments on P455?

Summary

Yes	No
3	2

Responses

Respondent	Response	Rationale
BUUK	Yes	<p>We would welcome a wider costs/benefit analysis of how this would impact industry, and the end consumer, as we do not agree with the Working Group's assessment that this is not needed.</p> <p>Similarly, we have concerns about the robustness of the case for this change NOT impacting the MHHS Programme (e.g. Transition and Migration) and would welcome further clarity on this.</p>
ENGIE	No	
Siemens	Yes	<p>This is feedback on this consultation doc not the redlining or the change per se. On Page 1 of this document 'P455_RPC_Attachment-E_Questions.docx' has a different method of sharing the consultation response than that outlined in page 6</p>
Stark	No	
SMS	Yes	<p>We agree that this change will have a positive impact on smaller consumers who feel 'locked in' to Private Networks by the constraints of the Difference Metering and Shared SVA Metering.</p>