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

Response Form

We welcome your views and responses to the questions set out in this response form. To help us understand your response, please provide supporting reasons for your answers where possible. We also encourage you to provide financial information showing any costs and/or benefits of this change to your business.

**Elexon can treat any information provided as confidential if you request this**, although we will provide all information to the Authority.

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| **Your response** |
| We invite you to respond to the questions in this form.  |
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| **How to return your response** |
| Please send responses, entitled ‘P455 Assessment Consultation’, to **bsc.change@elexon.co.uk** by **5pm** on**Tuesday 16 January 2024**. |

Your Details

| Respondent |
| --- |
| Name |  |
| Organisation |  |
| Contact telephone number |  |

| Parties Represented |
| --- |
| BSC Party role(s) represented (mark all that apply) | [ ]  Generator | [ ]  Supplier | [ ]  Distributor |
| [ ]  Interconnector  User | [ ]  Interconnector Administrator | [ ]  Interconnector  Error Admin |
| [ ]  Non Physical  Trader | [ ]  System  Operator | [ ]  Virtual Lead  Party |
| Non-Party role(s) represented (mark all that apply) | [ ]  ECVNA | [ ]  Trade Body[[1]](#footnote-1) | [ ]  MVRNA |
| [ ]  Consultant | [ ]  Supplier  Agent | [ ]  Other  [please state] |

| Confidentiality |
| --- |
| Does this response contain confidential information? | If ‘Yes’, please clearly mark the confidential parts  |

1. Assessment Procedure Consultation Questions

| **Question 1** |
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| Do you agree with the Workgroup’s initial unanimous view that P455 does better facilitate the Applicable BSC Objectives than the current baseline? |  |
| Please provide your rationale with reference to the Applicable BSC Objectives. |
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| **Question 2** |
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| Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P455 which would better facilitate the Applicable BSC Objectives? |  |
| Please provide your rationale with reference to the Applicable BSC Objectives. |
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| **Question 3** |
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| Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P455? |  |
| Please provide your rationale. Please record any general comments below and any specific comments in Section 4 of this response form. |
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| **Question 4** |
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| Do you agree with the Workgroup that the draft amendments to the CSDs in Attachment C deliver the intention of P455? |  |
| Please provide your rationale. Please record any general comments below and any specific comments in Section 5 of this response form. |
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| **Question 5** |
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| Do you agree with the Workgroup’s assessment of the impact on the BSC Settlement Risks? |  |
| Please provide your rationale. |
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| **Question 6** |
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| Do you agree with the Workgroup’s assessment of the consumer benefits? |  |
| Please provide your rationale. |
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| **Question 7** |
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| Do you agree with the Workgroup’s assessment that P455 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC? |  |
| Please provide your rationale. |
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| **Question 8** |
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| Will P455 impact your organisation? | **High/Medium/ Low/None** |
| If it will impact, please provide a description of the impact(s) and any activities which you will need to undertake between approval and implementation (including any necessary changes to your systems, documents and processes) and any on-going operational impacts. Where applicable, please state any difference in impacts between the Workgroup’s proposed solutions. |
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| **Question 9** |
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| How much will it cost your organisation to implement P455? | **High/Med/ Low/None** | **Appr. cost** |
| **£N-£N** |
| Cost estimates of high, medium, and low based on the following categories:* High: >£1 million
* Medium: £100-1000k
* Low: <£100k

If any, please provide details of these costs, how they arise. Please also state whether it makes any difference to these costs whether implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in costs between the Workgroup’s proposed solutions and if applicable, between the different roles. |
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| **Question 10** |
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| What will the ongoing cost of P455 be to your organisation? | **High/Med/Low/None** | **Appr. cost** |
| **£N-£N** |
| Cost estimates of high, medium, and low based on the following categories:* High: >£1 million
* Medium: £100-1000k
* Low: <£100k

If any, please provide details of these costs, how they arise. Please also state whether it makes any difference to these costs whether P455 is implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in costs between the Workgroup’s proposed solutions and if applicable, between the different roles. |
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| **Question 11** |
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| How long (from the point of approval) would you need to implement P455? |  |
| Please provide an explanation of your required lead time, and which activities are the key drivers behind the timescale. Please also state whether it makes any difference to this lead time whether implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in lead times between the Workgroup’s proposed solutions. |
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| **Question 12** |
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| Do you agree with the Workgroup’s recommended Implementation Date? |  |
| Please provide your rationale. |
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| **Question 13** |
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| Does the proposed On-Site Aggregation methodology result in accurate settlement outcomes (particularly in relation to difference metering)? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 14** |
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| What testing should be required to validate the solution is correctly implemented, and should this include an unmetered load tests? |
| Please provide your rationale. |
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| **Question 15** |
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| Is it right that the boundary meter HHDC and HHMOA are responsible for operations related to the sub-meters, given private network operators are responsible for these meters on a day-to-day basis, and given the move to new arrangements under MHHS? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 16** |
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| Is it right that the sub-meters should conform to COP10 standards?  |  |
| If ‘Yes’, please provide your comments. |
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| **Question 17** |
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| Should there be a requirement for Elexon to maintain a central database of sites where on-site aggregation is applied? Do the benefits of maintaining a central register outweigh the costs of creating and maintaining his central register? Do PNOs/DNOs have all the necessary data to manage schemes? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 18** |
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| Is there an impact on BSC Metering Dispensations? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 19** |
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| Is a Cost-Benefit Analysis required? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 20** |
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| Is it right that the scheme is limited to sub-100kW sites? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 21** |
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| Is it right that the MSIDs of Customers of a PN should be de-energised instead of logically disconnected, in order to minimise barriers to the Customer subsequently choosing a third party supply? Are there other ways in which the need to swap customers meters when they move in and out of schemes could be reduced/avoided? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 22** |
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| Is it right for the solution not to be captured under the complex site arrangements within BSC? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 23** |
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| Is a physical boundary meter required to implement the solution, and should it be? |  |
| If ‘Yes’, please provide your comments. |
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| **Question 24** |
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| What are the arguments for and against creation of a new market role for PNOs (e.g. access to industry data access; market competition)? |
| Please provide your rationale. |
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| **Question 25** |
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| Do you have any further comments on P455? |  |
| If ‘Yes’, please provide your comments. |
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1. P455 Redlined Legal Text

If you answered ‘No’ to Question 3, please use this section to record any specific comments you have against the P455 BSC Section draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

| **Insert BSC Section here** |
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1. P455 Redlined CSD Text

If you answered ‘No’ to Question 4, please use this section to record any specific comments you have against the P455 CSD draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

| **Insert CSD here** |
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1. Further Information

To help us process your response, please:

* Email your completed response form to **bsc.change@elexon.co.uk**, entering “P455 Assessment Consultation” in the subject line
* Clearly indicate any confidential parts of your response
* Respond by **5pm** on **Tuesday 16 January 2024** (the Workgroup may not be able to consider late responses)

The Workgroup will consider your consultation response at its next meeting. Once it has completed its assessment of P455, it will draft the Assessment Report, and present it to the Panel at its meeting on 8 February 2024.

#### Applicable BSC Objectives

The Applicable BSC Objectives are:

1. The efficient discharge by the National Electricity Transmission System Operator of the obligations imposed upon it by the Transmission Licence
2. The efficient, economic and co-ordinated operation of the National Transmission System
3. 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
4. Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
5. Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
6. Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
7. Compliance with the Transmission Losses Principle
1. Please state how many members you represent and which roles, where possible. [↑](#footnote-ref-1)