

# Report Phase Consultation Responses

## P460 ‘Amend the responsibility to propose and consult on a MHHS Migration Plan’

This Report Phase Consultation was issued on 14 August 2023, with responses invited by 29 August 2023.

### Consultation Respondents

Respondent	Role(s) Represented
ESPE	Distributor
MHHS Programme	MHHS Programme
National Grid Electricity Distribution	Distributor
Scottish Power Energy Networks	Distributor

## E L E X O N

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P460  
Report Phase Consultation  
Responses

30 August 2023

Version 1.0

Page 1 of 11

© Elexon Limited 2023

## Question 1: Do you agree with the Panel's initial unanimous recommendation that P460 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
ESPE	Yes	The programme is well placed to make overall decisions concerning elements of the project.
MHHS Programme	Yes	<p>Although the original proposal was for BSCCo to develop the migration plan as they would be running both the old and new settlement system. There have been a number of changes since this was agreed. Namely the concept of reverse migration and phasing of qualification. Given this additional complexity, both BSCCo and the Programme agreed that the required expertise sat within the MHHS programme rather than the BSCCo.</p> <p>For the avoidance of doubt, the plan will probably assign a number of tasks in the migration onto BSCCo as they will be operating the two settlement environments in a BAU state, and be responsible for qualifying parties to commence migration. By moving the Plan development to the MHHS Programme it also ensures that the plan is fair to both BSCCo and participants in the plan development.</p> <p>To this end the proposal meets objective (d)</p>
National Grid Electricity Distribution	Yes	
Scottish Power Energy Networks	Yes	

## Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P460?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
ESPE	Yes	
MHHS Programme	Yes	The changes transfer the requirements from BSCCo to the MHHS Programme who are better placed to write the plan.
National Grid Electricity Distribution	Yes	
Scottish Power Energy Networks	Yes	

### Question 3: Do you agree with the Panel's recommended Implementation Date?

#### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

#### Responses

Respondent	Response	Rationale
ESPE	Yes	
MHHS Programme	Yes	The sooner this change is agreed the sooner the 1st draft of the migration plan can be developed and shared with BSC Parties. The current programme plan requires the final Migration plan to be approved by 31/01/2025
National Grid Electricity Distribution	Yes	
Scottish Power Energy Networks	Yes	

## Question 4: Do you agree with the Panel's initial view that P460 should not be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
ESPE	Yes	Stakeholders should be afforded the opportunity to comment on such a change.
MHHS Programme	Yes	The Modification does not meet the criteria
National Grid Electricity Distribution	Yes	
Scottish Power Energy Networks	Yes	

Question 5: Do you agree with the Panel's initial recommendation that P460 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
4	0	0	0

### Responses

Respondent	Response	Rationale
ESPE	Yes	
MHHS Programme	Yes	
National Grid Electricity Distribution	Yes	
Scottish Power Energy Networks	Yes	

## Question 6: Will P460 impact your organisation?

### Summary

High	Medium	Low	None	Other
0	1	0	3	0

### Responses

Respondent	Response	Rationale
ESPE	None	
MHHS Programme	Medium	There will be an increase in costs of the Programme to develop the plan which will fall onto Suppliers as Programme funders, but this should be partially offset by a reduction in BSCCo costs.
National Grid Electricity Distribution	None	There will be no impact on our organisation. Our main concern is to ensure that there is a migration plan in place for the start of migration to ensure that parties have a full understanding of the requirements for their organisation in sufficient time to ensure resources are available to undertake those requirements.
Scottish Power Energy Networks	None	We see no impact on our organisation, we will be fully engaged in the Migration Plan as part of our obligations to support MHHS Programme.

## Question 7: How much will it cost your organisation to implement P460?

### Summary

High	Medium	Low	None	Other
0	1	0	3	0

### Responses

Respondent	Response	Rationale
ESPE	-	
MHHS Programme	Medium £100,00 - £1,000,000	As stated above there will be an increase in Programme costs, but for suppliers who fund the Programme, they should see a reduction in BSCCo costs, as BSCCo no longer have this obligation.
National Grid Electricity Distribution	None	N/A
Scottish Power Energy Networks	None	We see no cost change of this Proposal; costs will remain the same regardless of whether they are incurred under BSCCo or the MHHS Programme.



## Question 8: What will the ongoing cost of P460 be to your organisation?

### Summary

High	Medium	Low	None	Other
0	0	0	4	0

### Responses

Respondent	Response	Rationale
ESPE	-	
MHHS Programme	None	Development of the Migration Plan is a one off cost.
National Grid Electricity Distribution	None	N/A
Scottish Power Energy Networks	None	We see no cost change of this Proposal; costs will remain the same regardless of whether they are incurred under BSCCo or the MHHS Programme.

## Question 9: How long (from the point of approval) would you need to implement P460?

### Summary

0-6 months	6-12 months	>12 months	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
ESPE	N/A	
MHHS Programme	5 WD	The Final Migration Plan is due to be delivered by 31st Jan 2025, but the sooner it is approved, then the sooner the 1st draft could be shared with Industry
National Grid Electricity Distribution	0	There will be no impact to our organisation.
Scottish Power Energy Networks	N/A	We see no change in the lead time as a result of this Proposal, we are currently working to the Programme plan.

## Question 10: Do you have any further comments on P460?

### Summary

Yes	No
1	3

### Responses

Respondent	Response	Rationale
ESPE	No	
MHHS Programme	Yes	For the avoidance of doubt, the MHHS Programme would take responsibility for developing the migration plan, which will probably allocate a number of tasks/actions to BSCCo as part of the plan. It may be that in the final agreed plan the overall responsibility for Migration could sit with BSCCo.
National Grid Electricity Distribution	No	
Scottish Power Energy Networks	No	