

Request for Information Responses

E L E X O N

P461 'Accurate Reporting of Customers Delivered Volumes to Suppliers'

This Request for Information (RFI) was issued on 20 October 2023, with responses invited by 31 October 2023.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

RFI Respondents

Respondent	Roles Represented
Good Energy	Supplier
Flexitricity	Supplier and Virtual Lead Party (VLP)

344/04

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Question 1: Do you use the P0287 report and, if so, is this used to assist in billing your customers?

Summary

Yes	No	Neutral/No Comment
1	1	0

Responses

Respondent	Response	Rationale
Good Energy	N	N/A
Flexitricity	Y	Flexitricity is both VLP and Supplier. Flexitricity is Lead Party and Virtual Lead Party for a number of sites; there is overlap between these two roles. Flexitricity uses the P0287 flow to verify the integrity of its customer settlement processes.

Question 2: What would be the impact of receipt of the P0287 report being delayed by 2 days, as per the proposed Modification P461?

Summary

Impact	No impact	No comment
0	2	0

Responses

Respondent	Response	Rationale
Good Energy	No impact	N/A
Flexitricity	A short delay as proposed is unlikely to create any material adverse impact.	N/A

Question 3: Do you have any further views on P461 that you believe should be considered by the BSC Panel?

Summary

Yes	No	Neutral/No Comment
1	1	0

Responses

Respondent	Response	Rationale
Good Energy	N	N/A
Flexitricity	Y	<p>While the proposal deals with the proximate cause of the inaccuracy, it does not deal with the ultimate cause, which is the fact that energy imbalance for VLPs is calculated from FPN, whereas energy imbalance for Suppliers is calculated from contracted energy. A number of solutions for this could be considered:</p> <ul style="list-style-type: none"> • Support adoption of asset metering as introduced under P375, to remove contamination of VLP-related volumes by uncorrelated, independent actions behind the same boundary meter. It is pointed out that P375 is presently suffering implementation difficulties resulting from very limited metering agent support and (specifically for small sites) additional requirements for asset meters imposed outwith the BSC. • Re-consider the use of the FPN as the basis for energy imbalance calculation for VLPs, and seek a solution which is more closely aligned between VLPs and Suppliers.