

Report Phase Consultation Responses

P463 ‘Introduce a Standard Change Process’

This Report Phase Consultation was issued on 15 August 2024, with responses invited by 26 August 2024.

Consultation Respondents

Respondent	Role(s) Represented
National Grid Electricity Distribution*	Distributor
Confidential	Non Physical Trader
Last Mile Electricity	Distributor
SSE Energy Supply Limited	Supplier

* National Grid Electricity Distribution and SSE Energy Supply Limited both responded to the Assessment Phase Consultation. In response to the Report Phase Consultation, both respondents indicated that their answers have not changed. As such, with the exception of question 5, the answers given below are taken from the Assessment Phase Consultation and reproduced here for ease of visibility.

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/majority recommendation that P463 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
3	1		

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	No	<p>We feel that P463 would negatively impact Applicable BSC Objective (d) as we feel that it provides little benefit and it offers little difference to the existing Change process and adds complexity.</p> <p>We would also agree with the some of the work group member views that with only Fuel types and subsidiary document housekeeping changes on the Standard Change list, it would likely take many years to see a return on the effort to progress P463.</p>
Non Physical Trader	Yes	<p>Although we also believe the notice periods for fuel type additions could be shorter (e.g. 1 month). In general, the industry would benefit if fuel types like interconnectors, splitting out batteries, etc could be added more quickly.</p>
Last Mile Electricity	Yes	<p>The benefits to streamlining and reducing the burden on this process outweigh the minimal risk advised. The times savings alone will affect each party included in a positive way and condense the change process negating the need for Ofgem involvement.</p>
SSE Energy Supply Limited	Yes	No rationale given

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P463?

Summary

Yes	No	Neutral/No Comment	Other
4			

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	Yes	We agree that the redlined draft legal text delivers the intention of P463.
Non Physical Trader	Yes	Although we also believe the notice periods for fuel type additions could be shorter (e.g. 1 month). In general, the industry would benefit if fuel types like interconnectors, splitting out batteries, etc could be added more quickly.
Last Mile Electricity	Yes	These proposed amendments will offer clear instruction as to when this process can be used and set the foundation for further updates in the future should the opportunity present itself.
SSE Energy Supply Limited	Yes	No rationale given

Question 3: Do you agree with the Panel that the draft amendments to the CSDs BSC deliver the intention of P463?

Summary

Yes	No	Neutral/No Comment	Other
4			

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	Yes	We agree that the draft amendments to the CSDs in Attachment C delivers the intention of P463
Non Physical Trader	Yes	Although we also believe the notice periods for fuel type additions could be shorter (e.g. 1 month). In general, the industry would benefit if fuel types like interconnectors, splitting out batteries, etc could be added more quickly.
Last Mile Electricity	Yes	The changes reduce ambiguity with the new clearly defined terms.
SSE Energy Supply Limited	Yes	No rationale given

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

Summary

Yes	No	Neutral/No Comment	Other
4			

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	Yes	Yes we agree with the recommended implementation date.
Non Physical Trader	Yes	No rationale given
Last Mile Electricity	Yes	Where as it does make sense to implement this change as soon as possible, this does not warrant a special release and the first standard release after authority decision is sufficient.
SSE Energy Supply Limited	Yes	No rationale given

Question 5: Do you agree with the Panel's initial view that P463 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
4			

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	Yes	Agree
Non Physical Trader	Yes	No rationale given
Last Mile Electricity	Yes	As this is a proposed material amendment to code governance, this should not be considered as a Self-Governance modification and should be referred to the authority.
SSE Energy Supply Limited	Yes	No rationale given

Question 6: Do you agree with the Panel's initial consideration that P463 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
2		2	

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	No comment	
Non Physical Trader	Neutral	No opinion
Last Mile Electricity	Yes	The proposed change does not impact, extend nor hamper the condition in Article 18
SSE Energy Supply Limited	Yes	No rationale given

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

Summary

Yes	No	Neutral/No Comment	Other
3		1	

Responses

Respondent	Response	Rationale
National Grid Electricity Distribution	Yes	We agree that P463 is neutral in respect of consumer benefits.
Non Physical Trader	No comment	No rationale given
Last Mile Electricity	Yes	The consumer benefits are understood to be neutral
SSE Energy Supply Limited	Yes	No rationale given