

# Report Phase Consultation Responses



## P401 'Governance arrangements for BSC Panel Alternates'

This Report Phase Consultation was issued on 18 February 2020, with responses invited by 6 March 2020.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
Western Power Distribution	Distributor
SmartestEnergy	Supplier

---

300/08 P401  
Report Phase Consultation  
Responses

---

12 March 2020

---

Version 1.0

---

Page 1 of 6

---

© ELEXON Limited 2020

Question 1: Do you agree with the Panel's initial unanimous recommendation that P401 should be approved?

## Summary

Yes	No	Neutral/No Comment	Other
1	1	0	0

## Responses

Respondent	Response	Rationale
SmartestEnergy	No	No, we do not think P401 should be approved. This could result in Panel representatives giving their votes to another Panel member and not turning up, which could become habitual, and would go against Objective (d) in promoting efficiency in the balancing and settlement arrangements. We believe that P401 goes against the spirit of the BSC Panel, whereby one representative has one vote. It is important that the Panel has the broad representation originally intended at all times.
Western Power Distribution	Yes	-

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P401?

### Summary

Yes	No	Neutral/No Comment	Other
0	1	1	0

### Responses

Respondent	Response	Rationale
SmartestEnergy	No Comment	-
Western Power Distribution	No	Whilst we agree with the majority of the red-lined legal text we would question the redlining to section 4.3.2. We do not believe that any amendment is required to this section to deliver the intention of P401. Section 4.3.1 refers to the attendance element and this is subject to a proposed amendment under BSC Modification P400.

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

### Summary

Yes	No	Neutral/No Comment	Other
1	1	0	0

### Responses

Respondent	Response	Rationale
SmartestEnergy	No	We don't feel that the Modification should be approved, therefore we cannot support the proposed Implementation Date.
Western Power Distribution	Yes	-

Question 4: Do you agree with the Panel's initial view that P401 should be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
SmartestEnergy	Yes	Yes we would agree that P401 should be treated as a Self-Governance Modification, as it does not meet any of the criteria that would dictate otherwise. However, whilst this is true, it was Ofgem's desire for a full and proper consumer representation at Panel, and this modification is partially reversing this.
Western Power Distribution	Yes	-

## Question 5: Do you have any further comments on P401?

### Summary

Yes	No
0	2

### Responses

Respondent	Response	Rationale
SmartestEnergy	No	A potential alternative to this modification could be to ensure that each Panel member has his/her own alternate.
Western Power Distribution	No	-