

# Report Phase Consultation Responses



## P397 'Assessing the costs and benefits of adjusting Parties' Imbalances following a demand disconnection'

This Report Phase Consultation was issued on 15 July 2020, with responses invited by 29 July 2020. Note that the views of Scottish Power in regards to questions 4 and 5 have been amended since the original publication of this document following clarification.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
Scottish Power	Supplier, Supplier Agent
Siemens	Supplier Agent
SMS Energy Services	Supplier Agent
Western Power Distribution (WPD)	Distributor

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Question 1: Do you agree with that Panel that the new subsidiary document 'Demand Disconnection Event Threshold Rules' should be amended in line with Option 1?

## Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

## Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Siemens	Yes	We recognise that the cost of a DCE can outweigh the value of the DCE. Option 1 provides the correct balance between limiting disruption to participant processing and providing a reasonable estimate of the cost prior to requiring the Settlement Adjustment Processes (SAP) be carried out.
SMS	Yes	We agree that the new subsidiary document should be amended in line with Option 1.
WPD	Yes	We agree that Option 1 provides the most appropriate solution with the minimal cost and therefore the Demand Disconnection Event Threshold Rules should be amended in line with this option.

Question 2: Do you agree with the Panel's initial majority recommendation that P397 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Siemens	Yes	-
SMS	Yes	We agree with the Panel's recommendation as it delivers a solution that ensures that the SAP processes are only run when there is an impact to Settlement. This will prevent DC's from carrying out work that will not provide a benefit to Settlement.
WPD	Yes	We agree with the Panel's initial recommendations that P397 should be approved as it supports BSC Objective (d) promoting efficiency in the implementation and administration of the balancing and Settlement arrangements.  We do not believe there is still an issue for P397 to address. Option 1 is a simple calculation that can be achieved efficiently to provide a "go / no go" decision on whether the SAP needs to be run.

Question 3: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P397?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

### Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Siemens	Yes	-
SMS	Yes	-
WPD	Yes	We note that the amendments suggested in the original P397 Report Phase Consultation have been adopted and agree that the redlined changes to the BSC deliver the intention of P397.

Question 4: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P397, including the new subsidiary document 'Demand Disconnection Event Threshold Rules'?

## Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

## Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Siemens	Yes	Although we believe the change to the Code Subsidiary Documents deliver the intent of the change and closely matches the changes made to the BSC, we do believe the detail requires re-consideration to ensure consistency with current BSCP drafting. An example of this is the reference to Section Q6.9.5 (S3.4.5.1 of BSCP502 and elsewhere) which does not sit within the BSCP and the use of the term "Business Day" as opposed to the term "Working Day" used elsewhere within BSCPs.
SMS	Yes	-
WPD	Yes	We note that the amendments suggested in the original P397 Report Phase Consultation have been adopted and agree that the redlined changes to the BSC Code Subsidiary Documents including the new subsidiary document "Demand Disconnection Event Threshold Rules" deliver the intention of P397.

## Question 5: Will P397 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
1	3	0	0

### Responses

Respondent	Response	Rationale
Scottish Power	No	-
Siemens	No	There is no direct process change affecting our business and the change proposed will only reduce the likelihood of the need to carry out SAP following a DCE therefore having a reductive effect on the frequency of running our DCE processing.
SMS	No	There will be no impact to our organisations as these changes have already been made to our systems and processes
WPD	Yes	There will be a positive impact to our organisation as we will not be required to unnecessarily submit a P0238 where a Demand Control Event occurs and the processing costs outweigh the benefits.

## Question 6: Will your organisation incur any costs in implementing P397?

### Summary

Yes	No	Neutral/No Comment	Other
0	4	0	0

### Responses

Respondent	Response	Rationale
Scottish Power	No	-
Siemens	No	Our processes are unaffected by the change.
SMS	No	There will be no additional costs to our organisations as these changes have already been made to our systems and processes.
WPD	No	-

## Question 7: 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
Scottish Power	Yes	-
Siemens	Yes	-
SMS	Yes	-
WPD	Yes	-

Question 8: Do you agree with ELEXON's recommendation that P397 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
3	0	1	0

### Responses

Respondent	Response	Rationale
Scottish Power	No comment	-
Siemens	Yes	-
SMS	Yes	-
WPD	Yes	-

## Question 9: Do you have any further comments on P397?

### Summary

Yes	No
2	2

### Responses

Respondent	Response	Rationale
Scottish Power	Yes	Can you please provide details of what the process is to be followed for the impacted MPANs?
Siemens	No	-
SMS	No	-
WPD	Yes	<p>The change proposal is silent on where the new subsidiary document "Demand Disconnection Event Threshold Rules" will be held to enable parties to access.</p> <p>With regard to the responses to the RFI, the Workgroup felt that the P0238 need only be run once. Whilst we understand that when the P0238 is run there should be no errors, our understanding of P305 is that the P0238 should be run periodically to capture any MSIDs that have been the subject of a retrospective amendment.</p>