

# Report Phase Consultation Responses



## Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

## P411 'Including new LDSOs in Qualification to mitigate potential risks to Settlement'

This Report Phase Consultation was issued on 14 July 2020, with responses invited by 29 July 2020.

### Consultation Respondents

Respondent	Role(s) Represented
Association of Meter Operators (AMO)	Trade Body
SSE Energy Supply Ltd (SSE)	Supplier

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Question 1: Do you agree with the Panel's initial view that the redlined changes to the BSC deliver the intent of P411?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	LDSOs play an essential role in the settlement arrangements, it is appropriate that they are included within the Performance Assurance Framework (PAF). It is a curious anomaly that they have not been included to date. In recent years there has been a number of new entrant LDSOs and there is no reason that will not continue. As a result it is important that the capability of these new entrants is reviewed to ensure that they recognise and have processes in place to achieve these essential activities.
SSE	Yes	None Provided

Question 2: Do you agree with the Panel's initial view that the redlined changes to BSCP537 deliver the intent of P411?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	None Provided
SSE	Yes	None Provided

Question 3: Do you agree with the Panel's consideration that P411 does not impact the EBGL Article 18 terms and conditions held within the BSC?

### Summary

Yes	No	Neutral/No Comment	Other
1	0	1	0

### Responses

Respondent	Response	Rationale
AMO	No Response	N/A
SSE	Yes	None Provided

Question 4: Do you agree with the Panel's initial unanimous view that P411 does better facilitate Applicable BSC Objective (d) than the current baseline?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	None Provided
SSE	Yes	None Provided

Question 5: Do you agree with the Panel's initial unanimous recommendation that P411 should be approved?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	None Provided
SSE	Yes	None Provided

Question 6: Will P411 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
0	2	0	0

### Responses

Respondent	Response	Rationale
AMO	No	None Provided
SSE	No	None Provided

## Question 7: Will your organisation incur any costs in implementing P411?

### Summary

Yes	No	Neutral/No Comment	Other
0	2	0	0

### Responses

Respondent	Response	Rationale
AMO	No	None Provided
SSE	No	None Provided

## Question 8: Do you agree with the Panel's proposed Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	None Provided
SSE	Yes	None Provided

Question 9: Do you agree with the Panel's initial view that P411 should be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

### Responses

Respondent	Response	Rationale
AMO	Yes	None Provided
SSE	Yes	None Provided

Question 10: Do you have any other comments on P411?

### Responses

Respondent	Response
AMO	The proposed SAD text should also include a reference to support and participation in the TAA activities defined in BSCP27. Also BSCP20, BSCP25, BSCP11, BSCP03, BSCP68, BSCP509, BSCP515 - change of Energisation Status, installation of third party generation.