

Report Phase Consultation Responses

P398 'Increasing access to BSC Data'



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

This Report Phase Consultation was issued on 15 October 2020, with responses invited by 16 November 2020.

Consultation Respondents

Respondent	Role(s) Represented
Stark	Supplier Agent
Western Power Distribution	Distributor

P398
Report Phase Consultation
Responses

3 December 2020

Version 1.0

Page 1 of 8

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P398 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
2			

Responses

Respondent	Response	Rationale
Stark	Yes	<p>We agree with recommendation that P398 should be approved; P398 proposes amending the BSC so that all data is assumed open unless there is a reason otherwise.</p> <p>which will better facilitate applicable BSC Objective (C).</p> <p>P398 is concerned with data held in relation to Settlement and data held by ELEXON in its role as the BSCCo as per Section C3 of the Transmission Licence Standard Conditions; making this data available, removes perception of knowledge imbalance , and therefore potentially greater competition.</p>
Western Power Distribution	Yes	<p>We agree with the Panel's recommendation that P398 should be approved.</p>

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P398?

Summary

Yes	No	Neutral/No Comment	Other
2			

Responses

Respondent	Response	Rationale
Stark	Yes	The redlined changes to the BSC delivers the intention of P398 by defining the BSC Settlement data that can be included & the extensively considered procedures by which, for the avoidance of doubt, determinations of the availability of this data are made.
Western Power Distribution	Yes	We agree that the redlined changes to the BSC deliver the intention of P398

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

Summary

Yes	No	Neutral/No Comment	Other
2			

Responses

Respondent	Response	Rationale
Stark	Yes	
Western Power Distribution	Yes	Yes we agree with the proposed implementation date.

Question 4: Do you agree with the Panel's initial view that P398 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
2			

Responses

Respondent	Response	Rationale
Stark	Yes	P398 would have a material impact on competition, consumers and the market; could potentially make significant changes to how companies come to market, and therefore the products that they can offer to consumers. Will also have an impact on EGBL Article 18 t&c's.
Western Power Distribution	Yes	We agree that P398 should not be treated as a Self-Governance Modification and should go to the Authority for decision.

Question 5: Do you agree with the Panel's initial consideration that P398 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
1		1	

Responses

Respondent	Response	Rationale
Stark	Yes	Changes are required to made to BSC section H.
Western Power Distribution	No Comment	We are reliant upon the Panel's recommendation as to the impact on the EBGL Article 18 terms and conditions held within the BSC.

Question 6: Do you have any comments on the impact of P398 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
	2		

Responses

Respondent	Response	Rationale
Stark	No	
Western Power Distribution	No	

Question 7: Do you have any further comments on P398?

Summary

Yes	No
	2

Responses

Respondent	Response	Rationale
Stark	No	
Western Power Distribution	No	