

# Assessment Procedure Consultation Responses

## P402 'Enabling reform of residual network charging as directed by the Targeted Charging Review'

This Assessment Procedure Consultation was issued on 7 October 2020, with responses invited by 27 October 2020.



### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	Role(s) Represented
BUUK Infrastructure	Distributor
Russell Energy Consulting	Consultant
Northern Powergrid	Distributor
Electricity North West	Distributor
SP Energy Networks	Distributor
National Grid ESO	System Operator
ESP Electricity	Distributor
Western Power Distribution	Distributor
Energy Assets Networks Ltd	Distributor

Question 1: Do you agree with the Workgroup’s initial majority view that P402 does better facilitate the Applicable BSC Objectives than the current baseline, and so should be approved?

## Summary

Yes	No	Neutral/No Comment	Other
5	2	2	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	This is an enabling change to a direction already enacted by Ofgem. Whilst distribution businesses could provide this information separately and bi-laterally this would be wildly inefficient and expensive.
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Yes	<p>In the round, and assessing this change on its own merits – therefore ignoring potential inefficiencies related to wider change on the horizon resulting from the Access and Forward-Looking Charges Significant Code Review (the ‘Access SCR’) – we appreciate the benefits associated with a central approach in providing the necessary data to NGENSO.</p> <p>However, we are less convinced that Applicable BSC Objective (d) is better facilitated, as we are not of the view that a potential £2m solution is cost-effective, at least comparable to potential other solutions (e.g. it is estimated that data could be provided by DNOs from their billing system at a cost of around £135k (including validation) at the upper end of the range – note that this excludes DNO resource costs which we expect would be absorbed into current resource).</p> <p>The proposed solution should be rigorous, but ultimately NGENSO is discharging its directed requirement to implement the TCR by imposing a significant cost on BSC parties.</p>
Electricity North West	No	The ability to implement the TCR is NGENSO’s responsibility and this modification is merely trying to transfer the costs of implementation from NGENSO to other industry parties. The solution is overly complex and too costly. The central systems costs are extremely high and there has been no attempt to identify simpler solutions. It therefore cannot be

Respondent	Response	Rationale
		demonstrated that it better meets objectives a) and d)
SP Energy Networks	Neutral	Yes we agree that the P402 is better than the current baseline, however we believe the option to deliver this solution via the DNOs billing system, would be less costly for the industry and should be taken forward.
National Grid ESO	Yes	We believe that P402 is positive in respect of BSC objectives A, C & D whilst it is neutral against the other objectives. This is because P402 is a fundamental part of delivering the demand residual element of Ofgem's TCR Direction and so it supports NGENSO's obligation to deliver the Direction and the associated benefits to competition that Ofgem have identified as well as providing a more stable foundation for future change as discussed in our answer to Q15.
ESP Electricity	Yes	Yes, we agree that the applicable BSC objectives (A and D) are better facilitated by P402. However, we note that the solution is not fully complete in that it contains proposals yet to be developed.
Western Power Distribution	No	We are not convinced that the benefits of this justify the cost set out by Elexon.
Energy Assets Networks Ltd	Yes	Energy Assets Networks Ltd (EAN) believe that Applicable BSC Objectives (a) and (d) are better facilitated. Objective (a) as the change allows the Transmission Company to efficiently discharge the obligations placed upon them as part of the Ofgem's TCR Direction. We believe Objective (d) is also better facilitated as mandating the provision of NHH data by BSCCo's SVAA, rather than by the LDSO, is a more efficient approach.

## Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P402?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	2	0

### Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	No rationale provided
Russell Energy Consulting	Neutral	No rationale provided
Northern Powergrid	Yes	The legal text appears to serve the needs of P402. However, we do not believe that there needs to be a requirement for distributors to provide mapping data in accordance with paragraph 12.3. Distributors are required by licence to publish charging statements which include the tariffs that will be applied and the LLFCs that map to that tariff. This will provide the information required and therefore it is inefficient to place an additional obligation on distributors
Electricity North West	Neutral	I've not considered the legal text as I do not believe the proposal should be approved
SP Energy Networks	Yes	Yes we agree that the draft legal text delivers the intention of P402
National Grid ESO	Yes	Based on our initial review, we believe the text delivers the intention of the mod.
ESP Electricity	Yes	Yes, we agree that the legal text delivers the intent of P402.  We note that the recipient column for the Billing Report and Tariff Setting Report also includes 'Any Party' and 'Any Person' on a Request basis but that this may have to be amended if it is determined that the reports in questions will not be published
Western Power Distribution	Yes	The legal text sets out the requirements of the affected parties.
Energy Assets Networks Ltd	Yes	EAN has no comment on the draft legal text and believe it delivers the intention of P402.

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

### Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

### Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	This is in line with the provisions of the TCR.
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Yes	Implementation at the earliest opportunity is needed to facilitate the implementation of the TCR.
Electricity North West	Yes	No rationale provided
SP Energy Networks	Yes	If approved, yes we agree with the recommended Implementation Date.
National Grid ESO	Yes	Based on our initial review, we believe the text delivers the intention of the mod.
ESP Electricity	Yes	Yes, we agree with the proposed implementation date.
Western Power Distribution	Yes	This fits in with the Ofgem timetable for the implementation of the TCR.
Energy Assets Networks Ltd	Yes	To ensure a mirrored implementation of the TCR SCR across the various industry Codes and to support the implementation date (1 April 2022) of Ofgem's Direction, P402 needs to be implemented in the February 2022 BSC Release.

Question 4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P402 which would better facilitate the Applicable BSC Objectives?

## Summary

Yes	No	Neutral/No Comment	Other
4	4	1	

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	No rationale provided
Russell Energy Consulting	No	<p>The basic problem as set out in the Business Requirements is that NGESO does not have the data it needs to produce the relevant invoices or set tariffs. The relevant data can only be provided by third parties.</p> <p>Given that DNOs have the HH &amp; NHH data for Billing &amp; Tariff Setting they could provide the data directly to NGESO and there would be no need for a Modification.</p> <p>An Alternative as a half and half approach would be for the DNOs to provide the HH data directly to NGESO and for the BSC to be amended so that the D0030 data was available to NGESO. As with the question of the BR-18 report this could be explicitly to NGESO or to NGESO &amp; licenced parties.</p> <p>Either of these options may be cheaper and quicker to implement than the proposed Mod.</p>
Northern Powergrid	No	<p>We (DNOs, some IDNOs, NGESO, and Elexon, via the ENA) sought to establish a process whereby the necessary information would be provided by distributors via a new report which would be processed via respective billing systems. We engaged with St Clements Services (SCS), providers of Durabill – the billing system used by all DNOs.</p> <p>We believe the proposed solution – which is outlined by SCS in its response to the P402 consultation – would be fit for purpose and offers a considerably cheaper option with costs ranging from around £40k to £135k (split across all DNOs).</p> <p>However, we recognise that this does not include IDNOs, who would need to seek similar functionality, but we would not expect the cost to</p>

Respondent	Response	Rationale
		<p>be material; certainly not to the extent of the potential costs of implementing P402.</p> <p>It is worth noting that the costs associated with the alternative solution may also be borne by distributors, but otherwise we would expect NGESO to contribute to a solution which discharges its obligations under a direction from the Authority.</p> <p>We consider that any NGESO costs should be comparable between the solutions as a new billing system is required regardless.</p> <p>This alternative solution would not impact the BSC, so the response to the question is technically 'yes', as we are not aware of an alternative wholesale solution. The difference in materiality between the bilateral distributor solution, and P402, does raise the question as to whether P402 is genuinely the cheapest centralised approach available, however.</p> <p>A de-scoped P402 solution may be more appropriate, e.g. removing the need for the tariff setting report or placing the requirement of mapping the data on NGESO. We have not seen evidence that such options have been considered, which should reduce the burden on cost on BSC parties.</p>
Electricity North West	No	An alternative approach was identified before this work commenced, however NGESO and Elexon did not want to progress it as they preferred their own solution which maintains Elexon's involvement in the processes.
SP Energy Networks	Neutral	We believe that the alternative solution whereby LDSOs provide the data directly to NETSO would be more cost effective.
National Grid ESO	Yes	Agree with the workgroup that there are no other alternatives within the scope of the BSC. We do however note that whilst options outside of the BSC (specifically CUSC or DCUSA) may technically be possible, they are not feasible in the required timeframe or potentially non-economic as discussed in our answer to Q15.
ESP Electricity	Yes	We have not identified any potential alternative modifications for this purpose.
Western Power Distribution	No	We believe the simplest way to effect this would be for the DNOs and the IDNOs to send their data to

Respondent	Response	Rationale
		National Grid who then would be able to deal with this and meet their TCR requirements.
Energy Assets Networks Ltd	Yes	<p>There were two further alternatives discussed in the Workgroup. One was to mandate the LDSO to provide the data (NHH and HH) directly to NETSO. As P402 is supporting an obligation on NETSO, and not on the LDSO, passing significant costs of the required IT systems changes on to the LDSO, to support providing data within 2 WDs of the SF run, is unreasonable.</p> <p>A further alternative was to establish a 'Party Agent' i.e. not SVAA or LDSO, but the timescales to establish a new Agent would extend beyond the April 2022 implementation requirements.</p> <p>As the BSCCo already receives, validates and aggregates the NHH settlement data, EAN believes the most efficient solution is for the BSCCo to provide the report to NETSO, in an agreed format, based on the aggregation services they already provide to industry.</p>



Question 5: Do you agree with the Workgroup’s assessment that P402 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC, noting that a possible expansion to Section U data retention provisions would then impact these terms and conditions?

## Summary

Yes	No	Neutral/No Comment	Other
8	0	2	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	No rationale provided
Russell Energy Consulting	Yes	No rationale provided
Northern Powergrid	Yes	We have no immediate reason to dispute the view of the workgroup.
Electricity North West	Neutral	No rationale provided
SP Energy Networks	Yes	Yes we agree.
National Grid ESO	Yes	Agree with the workgroup’s view on P402’s impact on EBGL Article 18 terms and conditions.
ESP Electricity	Yes	Yes, we agree with that assessment.
Western Power Distribution	Neutral	No comment
Energy Assets Networks Ltd	Yes	EAN agree with the Workgroup’s assessment but noted that the Workgroup consider increased retention provisions under Section U of the BSC could then impact EBGL. This would apply to the provision of information by the LDSO. Please also refer to our answer to Q14 below.

## Question 6: Will P402 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

### Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	As a distribution business we will be required to submit reports as detailed in the consultation. We will need to make an amendment to our billing system in order to extract the necessary data for reporting. Costs are not obtainable at present, but it is not expected to be a large cost.
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Yes	<p>P402 would require that we: (i) provide monthly billing data; (ii) provide annual tariff setting data; (iii) work with Elexon to ensure that data for both (i) and (ii) is correctly aggregated for CVA sites; and provide mapping data between LLFC and the residual charging band.</p> <p>As identified by SCS, new reports will be required to provide this information.</p> <p>The impact this will have may be more onerous than the alternative option whereby data is provided on a bilateral basis from DNOs to NGESO, where e.g. that proposal would likely require NGESO to perform the simple mapping exercise based on the data provided and the charging statements published by all DNOs.</p>
Electricity North West	Yes	Probably, it will need to be assessed in more detail and this needs to be compared to the alternative approach that was outlined in March and not progressed by NGESO/ Elexon
SP Energy Networks	Yes	User Acceptance testing of the new reports required by ELEXON. Scheduling and producing these reports and sending them to ELEXON.
National Grid ESO	Yes	P402 is a fundamental enabler for delivering Ofgem's TCR direction and is key to ensuring that the necessary data exchanges happen between members of the industry. Any delay in P402

Respondent	Response	Rationale
		implementation will have a negative impact on NGENSO's programme to deliver TDR in time.
ESP Electricity	Yes	<p>Yes, as an LDSO, we will be required to provide HH billing and tariff setting data and band mapping data.</p> <p>The provision of the HH billing and tariff setting data to the specified timeframes will also require system changes to ensure that data is collated and provided in time. Lastly, we will need to create processes to ensure the requirements are being met and compliance with.</p>
Western Power Distribution	Yes	<p>Installation and testing of St Clements reports.</p> <p>Developing and implementation of processes to ensure timely running and despatching of reports and mapping data and appropriate checks.</p> <p>Undertaking work to ensure that all CVA data is correctly dealt with and where necessary creating new 'dummy' LLFCs.</p>
Energy Assets Networks Ltd	Yes	<p>The current solution of the LDSO to submit only the HH data to the BSCCo would mean a small increase in administration to collate and submit the data.</p> <p>We would not incur any system costs as our current billing system can support the requirement without a change in functionality.</p>

Question 7: Will your organisation incur any costs in implementing P402? If so, what do you estimate these to be?

## Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	As stated above costs are not available at present
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Yes	As identified by SCS, the new reports will cost around £25k in total (across all DNOs).
Electricity North West	Yes	The costs have not yet been evaluated as NGESO/Elexon have not properly evaluated other solutions that may be more efficient.
SP Energy Networks	Yes	There will be a cost to upgrade the DURABILL application to provide two new reports with the HH data for the tariff report and billing report. The total cost to be shared by the DURABLL consortium is in the range £20 – 35k. There will be additional internal costs to test these new reports. On question 15, we note an alternative option, whereby DURABLL would provide the billing data for both the HH and NHH data and the cost for doing so.
National Grid ESO	Yes	<p>The expected cost to NGESO of implementing the demand residual charges elements of Ofgem’s TCR (i.e. excluding the generation residual and BSUoS changes) with the implementation of P402 is expected to be approximately £530k. A proportion of this will be dedicated to ensuring that the existing file flows and processes between NGESO and Elexon are updated to obtaining this data.</p> <p>Without P402, there will be 3 additional and significant additional tasks that would dramatically increase cost and time to deliver;</p> <p>1. Updating or creating the commercial/regulatory framework to obtain the required data which will place a significant risk to non-delivery of the TCR within the appropriate timescales</p>

Respondent	Response	Rationale
		<p>2. Building new interfaces (including flexibility to include additional connections as the number of LDSOs grow and associated IT security systems, such as firewall rules and managed permissions) in our systems with parties who can provide the relevant data.</p> <p>3. Building the functionalities in our systems to process of 'raw' data and turn it into the input with the right granulate and format to be used for charging calculation.</p> <p>These 3 factors would create a significant risk of non-delivery by the directed implementation date and likely result in increased costs to NGENSO of several million pounds which we suspect will be more costly for industry and consumers overall than the P402 solution.</p>
ESP Electricity	Yes	<p>Yes, we will incur one-off system costs to build in the required reports in our system and ongoing personnel costs for managing the annual requirements of provision of band mapping.</p> <p>We have not identified a difference in costs if it were implemented as part of a normal BSC systems release or otherwise.</p>
Western Power Distribution	Yes	<p>The main external cost will be 4/14ths of the St Clements cost which will have been provided by St Clements which is envisaged to be a one-off cost.</p>
Energy Assets Networks Ltd	Yes	<p>As an IT system change is not required to support the proposed solution, EAN would not incur any costs to implement P402.</p>

## Question 8: How long (from the point of Ofgem approval) would you need to implement P402?

### Responses

Respondent	Response	Rationale
BUUK Infrastructure	6 months after approval	BUUK are currently in the process of having a new software system built and installed for DUoS billing. This is largely driven by recent approved regulatory changes for DCP268 and the TCR. Our lead time is therefore driven by our need to implement this system as a priority. We will need a reasonable amount of notification in order to be able to build these reports into this new system. A November 21 release therefore would be our minimum amount of notice needed in order to meet an April 22 implementation date
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	~4 months	As identified by SCS, the new reports will take around three months to deliver from receipt of approval from the Authority, and we have assumed that we will need one additional month for user testing.
Electricity North West	None provided	As per question 7
SP Energy Networks	~ 3 months +1 to 2 months	Our Billing Service Provider would require approximately 3 months from the point of Ofgem approval to deliver these reports to DNOs for user acceptance testing. DNOs would then require 1 to 2 months to test these reports.
National Grid ESO	N/A	The ESO are already working to deliver the solution to meet the Ofgem direction on the assumption P402 will be approved (i.e. the ESO are working at risk) to ensure that the TCR changes are implemented as per Ofgem's direction. We are on track to meet the implementation plan suggested by Elexon as part of P402 and the timescales directed by Ofgem.
ESP Electricity	N/A	We are comfortable that the proposed implementation date of February 2022 provides an adequate lead time to develop any necessary system and process changes.
Western Power Distribution	~6 months	In order to fully implement P402 we will have to implement our own TCR measures so that the MPAN/MSIDs are on the appropriate LLFCs in order for their banding to be identifiable. At the moment

Respondent	Response	Rationale
		this is schedule to happen by approximately July 2021 and we anticipate around 6 months elapsed time after this to install and test the St Clements reports and implement our own process and changes. This dependent on the timely delivery of the St Clements reports which based on experience which do expect to be an issue. This critically dependent on the Elexon testing to enable TCR LLFCs to be used in settlements.
Energy Assets Networks Ltd	6 Months	EAN would be able to implement P402 immediately following approval of the change. The October 2021 tariff setting data would require manual processing for the one off exercise, but from April 2022 onwards, EAN will be able to meet the requirements of the change.

Question 9: Do you agree with the Workgroup that both Billing and Tariff Setting Reports should be published on the Elexon Portal and made available to all Parties and those who pay for a licence? Would publishing the output data (in particular the Billing Reports) be commercially sensitive?

## Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	Publishing the data will help the energy industry to make data more open and accessible. In our assessment we do not believe this data is commercially sensitive. As long as there is a robust process in place to ensure data and access is given on a fair and consistent basis as opposed to the highest bidder then we are in favour of this approach.
Russell Energy Consulting	Yes	I believe that the Tariff Setting Report should be freely available (i.e not require a Licence for non BSC Parties to access it).
Northern Powergrid	No	<p>We support being transparent, but where this is efficient. We do not believe that implementation of the TCR requires additional information to be put in the public domain than is already planned.</p> <p>Those that need to know will be aware of the LLFC assigned to a site. They will therefore know the residual charging band. DNOs publish charging models (the CDCM anyway) and charging statements. NGENSO will publish equivalent information.</p> <p>We are not convinced there is genuine benefit in publishing additional information. If this information is not published pre-TCR, what benefit is to be achieved by publishing it post-TCR – where the TCR in a simple form represents new LLFCs and new tariffs.</p>
Electricity North West	No	It's difficult to justify why all this information needs to be published.
SP Energy Networks	Yes	Yes we agree and don't believe this data is commercially sensitive.



Respondent	Response	Rationale
National Grid ESO	Yes	We agree and support the principle of making suitable data transparent and accessible; however we would say that this is only beneficial if it is economic to provide this data and it will be used. In addition, we do not believe this data is sensitive as our understanding is that this data is already available for individual metering systems and could be created if a party was willing to create this dataset from individual records
ESP Electricity	Yes	As these reports are presented on an aggregated basis, we have not identified any reasons why these cannot be published on the Elexon portal.
Western Power Distribution	Yes	We agree with Workgroup that this would improve the transparency of the process with caveat that the data should be aggregated sufficiently to prevent the data of private individuals of commercial customers to be identified or commercially sensitive data being published either directly or extractable by reverse engineering using this data on its own or in conjunction with other publicly available data.
Energy Assets Networks Ltd	Yes	As the Billing and Tariff Setting Reports aggregates the data and is not split out to identify an individual company, EAN does not consider the data to be commercially sensitive.

Question 10: Should input billing data also be published alongside output reports so that Parties can trace how input data is transformed? Would publishing the input data be commercially sensitive?

## Summary

Yes	No	Neutral/No Comment	Other
5	3	1	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	As above
Russell Energy Consulting	Yes	I believe that it is this input file that should be available to Suppliers to facilitate validation / querying of the data. If the final Aggregated / Consolidated file as per BR-18 is also available that is fine, but it should not be to the exclusion of the BR-5 data.  Given the sentiment's towards Open Data and Mod 398 that is currently in progress I support the view that it should be available to non-BSC Parties.
Northern Powergrid	No	We do not understand what benefit is being sought from doing this, other than transparency for transparency's sake.
Electricity North West	Neutral	No rationale provided
SP Energy Networks	No	We cannot see what benefit this would achieve. As this option has not been included in the impact assessment, indicative costs provided are likely to see a further cost impact on the industry.
National Grid ESO	Yes	Please see our response to Q9.
ESP Electricity	No	We have some concerns on the commercial sensitivity of the input data and would require adequate justification for the benefits (how much and to whom) that publishing this data would bring.
Western Power Distribution	Yes	No rationale provided
Energy Assets Networks Ltd	Yes	As with Q9 above, as the billing data is aggregated and not split out to identify an individual company,

Respondent	Response	Rationale
		EAN does not consider the Reports to be commercially sensitive.

Question 11: Whilst P402 will not have been implemented nor will sufficient data be available to ELEXON to produce a Tariff Setting Report, do industry participants agree that the definition of and provision of data for setting Tariffs in October 2021 be agreed by LDSOs and NETSO outside the P402 solution?

## Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	We have no issue with completing this work bilaterally, but we have concerns that as this sits outside of the official requirements it could go unnoticed by some parties.
Russell Energy Consulting	Yes	It is not obvious that there is any other way of doing it, especially for HH. Presumably the source data that is used will be published by NETSO.
Northern Powergrid	Yes	DNOs will publish 2022/23 charges in December 2020. If needed, we can refresh the volume assumptions ahead of October 2021.
Electricity North West	Yes	There is sufficient data for NGENSO to set tariffs from DNO published models and NGENSO have not justified imposing such an expensive solution on industry where they are not proposing to fund the discharge of their licence obligations.
SP Energy Networks	Yes	Yes we agree and we believe that this solution should be taken forward rather than the P402 solution.
National Grid ESO	Yes	We would prefer if Elexon were capable of producing this data but accept that is not possible, therefore we agree that this data should be provided by other means in October 21 but the data provision obligation incl. the scope, quality and timescale should be codified to ensure all parties involved are clear about the requirements and there is no ambiguity.
ESP Electricity	Yes	Yes, we agree but have concerns regarding the governance and development of this work outside a centralised code/workgroup. These concerns are on having adequate representation from various LDSO

Respondent	Response	Rationale
		types, a framework for agreeing decisions and the governance of this reporting overall.
Western Power Distribution	Yes	Due to the timing of this report with respect to other TCR related changes mean that these reports will have to be produced on a relatively ad-hoc basis and may be performed slightly differently for each DNO. The documenting of these processes would be potentially complex and would have no lasting value as this would be a one off process.
Energy Assets Networks Ltd	Yes	To enable NETSO to meet its obligations for setting tariffs in time for April 2022 implementation, NETSO would need to receive the first set of data in October 2021. We understand that the BSCCo will be unable to deliver the required system changes in time to meet this date and therefore this would be prior to P402's implementation.

Question 12: Is the approach to treating NHH MSIDs (and MC F and G MSIDs) reasonable under the circumstances? Are there alternative approaches the workgroup should consider?

## Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	We have no further suggestions
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Yes	Related MPANs represent a minor group in terms of count of MPAN and associated consumption. It is the supplier's responsibility for associating the primary and related MPAN. DNOs do not easily know what this association is, and therefore the solution will need to work with the information that is available.
Electricity North West	Yes	Use DUoS billing reports as proposed over 7 months ago and not progressed.
SP Energy Networks	Yes	Yes we believe that the approach for treating NHH MSIDs is reasonable.
National Grid ESO	Yes	Whilst the approach to treating NHH MSIDs is not ideal, we believe this is the only suitable option given the small (and shrinking) scale of the issue and the timescale restrictions – especially when compared to the benefits this modification will provide.
ESP Electricity	Yes	Yes, we agree that the approach adopted for NHH MSIDs is a positive development which contains reporting efficiencies for LDSOs and the SVAA compared to the initial P402 proposal.
Western Power Distribution	Yes	Because of the small and diminishing impact of related MPANs/MSID and the potentially disproportionate cost of accurately matching these.
Energy Assets Networks Ltd	Yes	EAN believes the approach is reasonable under the circumstances and is not aware of a more efficient alternative approach.

Question 13: Should the P402 solution include a requirement to publish UMS data that SVAA will send to NETSO? If so, why and how would you recommend that this data is published?

## Summary

Yes	No	Neutral/No Comment	Other
1	3	5	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	No	We are indifferent to this data being published and are unclear if any other parties outside of NETSO would benefit from having this data available. Should other parties see a benefit in having this data published we would not be opposed to it being published.
Russell Energy Consulting	Neutral	No rationale provided
Northern Powergrid	No	Again, we do not understand what tangible benefit can be achieved by publishing this information.
Electricity North West	Neutral	No rationale provided
SP Energy Networks	No	We agree with the working group not to include requirements to publish UMS data at this stage.
National Grid ESO	Yes	We have no strong preference, but as per our response to Q9, we agree with the general principle of data transparency if it is beneficial, useful and cost effective to do so.
ESP Electricity	Neutral	We have not identified any immediate benefits of publishing this data and do not have a preference.
Western Power Distribution	Neutral	No rationale provided
Energy Assets Networks Ltd	Neutral	UMS reports are not currently published and the fact that we are not aware of other proposed changes to central systems which would facilitate this, EAN cannot provide an opinion on whether to include UMS data as part of the publication of NHH/HH reports.

Question 14: Is the proposed approach to data retention appropriate? Do you have a preference for expanding existing Section U1.6 provisions to apply to non-Settlement data and processes or for creating new retention requirements that mirror Section U1.6?

## Summary

Yes	No	Neutral/No Comment	Other
5	0	4	0

## Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	The recommendation is in line with other BSC provisions and see no reason for this to be different.
Russell Energy Consulting	Neutral	No comment
Northern Powergrid	Neutral	Providing data retention is in line with relevant data protection requirements such as GDPR we do not have a view on this.
Electricity North West	Neutral	No rationale provided
SP Energy Networks	Neutral	No preference
National Grid ESO	Yes	We believe the suggested approach for data retention (i.e. kept for 28 months) is sufficient and appropriate. Whilst we agree that the data used by P402 won't be needed beyond RF, we are uncertain whether it is more efficient to keep this data for 28 months using existing systems/processes compared to creating a new data retention process/policy/system specifically for this data. As such, as long as the P402 data is kept until at least RF, we are flexible in terms of data retention.
ESP Electricity	Yes	We are comfortable with the proposed approach to data retention and do not have a preference on mirroring the existing data retention provisions.
Western Power Distribution	Yes	It is in line with the settlement timetable.
Energy Assets Networks Ltd	Yes	EAN believe the proposed approach is appropriate – to extend the existing data retention to at least 28 months to cover the P402 reports and input data.



Respondent	Response	Rationale
		EAN has no preference on whether that requirements sits in or outside Section U1.6.

## Question 15: Do you have any further comments on P402?

### Summary

Yes	No
4	4

### Responses

Respondent	Response	Comments
BUUK Infrastructure	No	
Russell Energy Consulting	Yes	In order to facilitate invoice validation for Suppliers with HH portfolios it would be preferable for the DNOs to include an MPAN Count in this file – i.e MPAN Counts per (HH) LLFC Id per DNO per GSP Group for the day.
Northern Powergrid	No	
Electricity North West	Yes	The implementation of the TCR is NGESO’s obligation and the focus of these changes has primarily been for the NGESO to avoid the cost of delivering its obligations. It is not clear why this requirement should be implemented through the BSC particularly where there has been a reluctance to properly engage on alternative approaches that are probably more efficient.
SP Energy Networks	Yes	Early discussions regarding potential P402 solutions had both the HH and NHH data being provided from DURABILL. The ENA requested St Clements provide indicative costs to develop the billing and tariff reports to cover both HH and NHH as originally discussed. Such costs would be in the region of an additional £20 - £50k, in addition to the costs detailed in question 7. So total costs would be in the range £40 to £85k, shared by all DNOs in the consortium. The estimated costs of these reports from ELEXON are in the range of £1.5 to £2 million. On this basis, we believe the option to deliver the solution via the DNOs billing system presents an overall more cost effective approach for the industry and is the solution that should be taken forward.
National Grid ESO	Yes	<p>We think it’s important to also document some other key considerations that P402 raise;</p> <ul style="list-style-type: none"> <li>• It is right and prudent that this data exchange is documented in a legally binding document to inform</li> </ul>

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		<p>and protect all industry participants who will be affected by this modification directly or indirectly via residual charges. This is particularly significant, given the value of money dependant on this data flow and to protect all parties.</p> <ul style="list-style-type: none"> <li>• The P402 solution provides longer-term benefits to industry compared to other options such as the ESO obtaining the data directly from LDSOs. This is because it ensures the 'outputs' of P402 are centrally captured and future industry changes (e.g. Access &amp; Forward Looking Charges, Faster Switching, MHH settlement etc) can be considered if/when the P402 'inputs' change. This would not happen if the P402 data requirements were not documented in the BSC and therefore opens opportunities for more efficient solutions in the longer-term.</li> <li>• The currently identified solution is the minimum viable solution for ESO due to restrictions in data provision timescales (i.e. data from the DNOs is not available until the SF settlement run). As part of the industry developments listed in the previous point, we would look to revise when this data is provided so that ESO billing processes can operate closer to real time. There will be benefits of ensuring these industry changes are co-ordinated in a single industry code rather than across multiple codes.</li> <li>• The P402 solution has already identified short-term benefits in reducing the amount of data LDSOs need to provide and so reduce impact on LDSO systems.</li> <li>• Data processing of P402 'input' data to 'output' data could be done by Elexon, NGESO or LDSOs. From the consultation and our response to Q7, it is clear the cost to the industry (and so consumers) if this processing was undertaken by Elexon or NGESO, however so far there has being no data to state the costs of LDSOs undertaking this processing to justify this is a viable option. In addition, it is not clear if there any cost differences of LDSOs providing input data to Elexon compared to NGESO.</li> <li>• Elexon is the recognised industry expert when it comes to managing and processing industry data and so it seems appropriate that the transformation of the P402 data should be in their remit –</li> </ul>

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		<p>especially as this data will affect a large number of industry participants.</p> <ul style="list-style-type: none"> <li>• P402 enables better provision of data in a transparent way than other methods. Feedback from industry (e.g. Issue 84, P398, P399) has shown market participants prefer industry data to be accessible and centrally located (such as BMRS or the Elexon Portal) rather than scattered across numerous webpages/databases. A BSC solution helps facilitate this compared to other solutions.</li> <li>• As highlighted in our response to Q8, we are already delivering the TCR solution (at risk) on the assumption it will be approved. Should the P402 solution not be approved, there will be insufficient time to develop a new solution or find an alternative source for the P402 output data (due to challenges highlighted in Q7) leading to a high likelihood that the TCR will not be delivered in the timescales as directed.</li> </ul>
ESP Electricity	No	
Western Power Distribution	No	
Energy Assets Networks Ltd	Yes	Implementing P402 in April 2022 overlaps with a number of other significant industry changes e.g. Faster Switching and MHHS. This may impose additional constraints on resources to meet each programme's implementation date