

Assessment Procedure Consultation Responses

P419 'Enhanced Reporting of Demand Data to the NETSO to facilitate BSUoS Reform'



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

This Assessment Procedure Consultation was issued on 15 November 2021, with responses invited by 6 December 2021.

Consultation Respondents

Respondent	Role(s) Represented
National Grid ESO (NGESO)	System Operator

Question 1: Do you agree with the Workgroup’s initial unanimous view that P419 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	<p>The proposal better facilitates BSC Applicable Objective (a) as it would put in place processes to collect, aggregate and report metered volumes to NGESO which are necessary to support NGESO in the calculation of network charges in accordance with its licence.</p> <p>The proposal better facilitates BSC Applicable Objective (c) as it promotes effective competition in the generation and storage of electricity. Currently interconnectors are exempt from BSUoS charges whilst UK generation is not. This proposal will ensure UK generation is on a level with interconnectors.</p> <p>The proposal better facilitates BSC Applicable Objective (d) as it allows NGESO to access the data required to bill BSUoS in the only way possible, promoting efficient operation of the system.</p> <p>The proposal is neutral against BSC Applicable Objectives (b), (e), (f) and (g), as it doesn’t interact with the operation of the system, decisions made by the European Commission, EMR legislation or the Transmission Losses Principle.</p>

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P419?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	The draft legal text replaces all references to storage exclusion from BSUoS with non-final demand. This is reflective of the P419 solution which looks to extend the processes introduced through P383.

Question 3: Do you agree with the Workgroup that the amendments to the Code Subsidiary Documents in Attachment B deliver the intention of P419?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	The amendments replace all references to storage exclusion from BSUoS with non-final demand. This is reflective of the P419 solution which looks to extend the processes introduced through P383.

Question 4: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	This Implementation Date is required to achieve the required changes to enable BSUoS Reform, unlocking the potential consumer and system benefits of that change.

Question 5: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P419 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
1			

Responses

Respondent	Response	Rationale
NGESO	Yes	The proposed solution is efficient in terms of delivering the changes required to enable BSUoS reform, while limiting changes to BSC systems and consequential changes to NGESO's own systems.

Question 6: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	This process shouldn't affect BSC settlement, so NGESO agrees with the assessment that no impact is expected.

Question 7: Do you agree with the Workgroup's assessment that P419 does/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
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO is of the view that there are no EBGL/EBR impacts in relation to this modification.

Question 8: Does your organisation agree with the Workgroup that maintaining all three options for submitting declarations should be maintained? If you think one of the routes should not be implemented, please state which process and your rationale.

Summary

Yes	No	Neutral/No Comment	Other
0	0	1	0

Responses

Respondent	Response	Rationale
NGESO	No comment	-

Question 9: Do you agree with the use of existing DUoS declarations instead of a Director’s signature as proof of the Non-Final Demand status of a site? What risks or issues do you believe this could cause, if any (noting the Workgroup did not identify any material risks)?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO agrees with this approach as it represents an efficiency for many industry participants. We do not believe there are any risks or issues this could cause.

Question 10: Should the use of DUoS declarations be time-limited (i.e. to assist in initial implementation) or should it form part of the enduring solution?

Summary

Yes	No	Neutral/No Comment	Other
0	0	1	0

Responses

Respondent	Response	Rationale
NGESO	No comment	-

Question 11: If the use of DUoS declarations should be time-limited, do you believe it should be for 3, 6, or 9 months? Please provide reasons why.

Summary

Yes	No	Neutral/No Comment	Other
0	0	1	0

Responses

Respondent	Response	Rationale
NGESO	No comment	-

Question 12: If you expect to register sites in this way, please indicate the number of sites you expect to put through this process.

Summary

Yes	No	Neutral/No Comment	Other
0	0	1	0

Responses

Respondent	Response	Rationale
NGESO	No comment	-

Question 13: Do you agree with the Workgroup's view that P419 should not allow retroactive declarations of exemption?

Summary

Yes	No	Neutral/No Comment	Other
1	0	0	0

Responses

Respondent	Response	Rationale
NGESO	Yes	NGESO agrees with this view, as there will be adequate time for parties to submit declarations and have those validated before the BSUoS charging methodology changes. The CUSC does not allow for retroactive declarations of exemptions, so the current BSUoS charging methodology doesn't allow for it.

Question 14: What benefits will the reporting of BSUoS-exempt CVA sites bring and what issues, if any, would reporting SVA data only bring?

Responses

Respondent	Rationale
NGESO	NGESO agrees that data transparency is important. It is already public information as to which CVA BMUs are for generation, storage, or eligible service facilities. This data's use for BSUoS forecasting seems limited in light of CMP361, which would see BSUoS moved to a fixed ex-ante tariff. Therefore, the costs to NGESO to support the publication of this data don't seem to be matched by the potential benefits of doing so. If there is a clear statement that the benefits of publishing this data are greater than the costs that NGESO would incur, then we would be supportive of this publication, as we are committed to providing relevant information to industry where it's adding value.

Question 15: If CVA data were to be published, should it be published on Elexon's Website (and subsequently the new Insights platform) or NGENSO's Portal?

Responses

Respondent	Rationale
NGESO	It would seem more effective to publish the data together on Elexon's website, in this scenario. This would allow any users of the data to access it from a single source, in a consistent format. Given that the SVA data for storage is currently published on Elexon's website, it feels sensible to maintain that as the location for this data. In general, Elexon's website is a more 'natural' location to find metering data than NGENSO's data portal.

Question 16: Should this data consist simply of a list of BSUoS-exempt CVA sites or should aggregated CVA non final demand volumes also be published (on a monthly basis)?

Responses

Respondent	Rationale
NGESO	As per the answer to Question 14, it is unclear what the benefit of either approach would truly be. Of the two approaches, publishing aggregated CVA non final demand volumes seems better as it provides the information in a format where it can be plugged into a BSUoS forecasting model. However, as stated previously, this would have limited value if CUSC Modification CMP361 is implemented and moves BSUoS charges to a fixed tariff.

Question 17: Will P419 impact your organisation?

Summary

High	Medium	Low	None	Other
1	0	0	0	0

Responses

Respondent	Response	Rationale
NGESO	High	NGESO will be updating our processes to ingest the updated data in line with the new BSUoS charging methodology.

Question 18: How much will it cost your organisation to implement P419?

Summary

High	Medium	Low	None	Other
0	0	0	0	1

Responses

Respondent	Response	Rationale
NGESO	Other	NGESO has provided a rough order of magnitude impact assessment, included in the consultation document. A more detailed impact assessment will be provided ahead of the third workgroup, later in December.

Question 19: What will the ongoing cost of P419 be to your organisation?

Summary

High	Medium	Low	None	Other
0	0	0	0	1

Responses

Respondent	Response	Rationale
NGESO	Other	NGESO will provide this information as part of the detailed impact assessment referenced in the answer to Question 18.

Question 20: How long (from the point of approval) would you need to implement P419?

Summary

0-6 months	6-12 months	>12 months	Other
0	1	0	0

Responses

Respondent	Response	Rationale
NGESO	10-12 months	NGESO should be able to implement changes required within the timeframe to which ELEXON are working.

Question 21: Do you have any further comments on P419?

Summary

Yes	No
0	1

Responses

Respondent	Response
NGESO	No