P439 'Enabling BSCCo to undertake development of the EDA-based Data Integration Platform'

This Report Phase Consultation was issued on 19 April 2022 with responses invited by 3 May 2022.

Consultation Respondents

Respondent	Role(s) Represented
Salient Systems Ltd	Supplier Agent
National Grid ESO	NETSO
ScottishPower Energy Retail	Supplier

Question 1: Do you agree with the Panel that the redlined changes in Attachment B deliver the intent of P439?

Summary

Yes	No	Neutral/No Comment	Other
1	1	0	1

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Mostly	We are in favour of the proposal overall. However, whilst the redllined text mentions test (including industry participatory testing), there is no overt responsibility for acceptance of the "finished product" nor responsibility for the development of the acceptance criteria. These may be developed as part of the MHHS TOM and imposed on the DIP development project but it is suggested that this responsibility is written into the redlined text at this stage to prevent confusion over acceptance responsibility between OfGEM and Elexon (and any sub-contracted party) at a later date.
National Grid ESO	Yes	We agree that the redlined changes in Attachment B deliver the intent of P439.
ScottishPower Energy Retail	No	One of the main objectives of this modification is to give the MHHS Implementation Manager the vires to develop the EDA by procuring an external service provider to design, build and test the DIP. However, as currently drafted, paragraph 12.9.A.2 (a) opens the possibility for the MHHS Implementation Manager to develop the DIP without procuring a third-party provider and this appears to be contrary to this objective. It is also not clear which of the modification objectives paragraph 12.9.A.2 (d) is intended to deliver. This paragraph needs to be changed to ensure that the intent of this clause is clear.

Question 2: Will P439 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
Salient Systems Ltd	No	-
National Grid ESO	No	While NGESO will be affected by the on-going operation of the EDA-based Data Integration Platform, this modification to allow Elexon to undertake its development will not impact our organisation.
ScottishPower Energy Retail	No	-

Question 3: Will your organisation incur any costs in implementing P439?

Summary

Yes	No	Neutral/No Comment	Other
0	3	0	0

Responses

Respondent	Response	Rationale
Salient Systems Ltd	No	-
National Grid ESO	No	While NGESO will be affected by the on-going operation and utilisation of the EDA-based Data Integration Platform, we consider that the change in this specific modification (which purely provides the ability for Elexon to undertake development and implementation) should not result in any immediate costs to our organisation. Please also refer to the response we provided to the Ofgem consultation earlier this year which provides our initial, draft views on any additional costs associated with the EDA and recovery principles.
ScottishPower Energy Retail	No	-

Question 4: Do you agree with the Panel's initial view that P439 does not impact the EBGL Article 18 terms and conditions related to balancing held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
3	0	0	0

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	-
National Grid ESO	Yes	We agree that P439 does not impact the EBGL Article 18 terms and conditions related to balancing held within the BSC.
ScottishPower Energy Retail	Yes	-

Question 5: Do you have any further comments on P439?

Summary

Yes	No
1	2

Responses

Respondent	Response	Comment
Salient Systems Ltd	No	-
National Grid ESO	Yes	For our more general views on the governance, funding and operation of the EDA□based Data Integration Platform, please refer to our response to the Ofgem consultation earlier this year on the topic.
ScottishPower Energy Retail	No	-

Redlined Text

Any specific comments against the P439 draft redlining of BSC Section C is summarised below.

Respondent	Location	Comment
Salient Systems Ltd	12.9A.2 (a)	There is no overt responsibility for acceptance of the "finished product" nor responsibility for the development of the acceptance criteria. These may be developed as part of the MHHS TOM and imposed on the DIP development project but it is suggested that this responsibility is written into the redlined text at this stage to prevent confusion over acceptance responsibility between OfGEM and Elexon (and any sub-contracted party) at a later date.
ScottishPower Energy Retail	12.9.A.2 (a)	In this section "may appoint" should be changed to "appoints"
ScottishPower Energy Retail	12.9.A.2 (d)	When read in conjunction with the primary clause it is not clear what the objective or intent of this sub-paragraph is. This section needs to be changed to make its intention clear.