

Assessment Procedure Consultation Responses

P437 'Allowing non-BSC Parties to request Metering Dispensation'

This Assessment Procedure Consultation was issued on 11 July 2022, with responses invited by 29 July 2022.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Scottish Power	Supplier Agent
National Grid ESO	NETSO

P437
Assessment Consultation
Responses

dd Month yyyy

Version 1.0

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Question 1: Do you agree with the Workgroup that there are no potential Alternative Modifications within the scope of P437 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	There are no reasonable alternative solutions as far as I'm aware at this stage.

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P437?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	As far as I can tell and am aware, this proposed text meets the aims of the proposal.

Question 3: Do you agree with the Workgroup that the amendments to the Code Subsidiary Documents in Attachment A delivers the intention of P437?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	As far as I can tell and am aware, this proposed text meets the aims of the proposal.

Question 4: Do you agree with the Workgroup's initial view that P437 should be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	<p>Yes, I agree with the workgroup's view that P437 is suitable for self-governance as;</p> <ul style="list-style-type: none">• The impact upon the BSC document itself is small, non-contentious with no identified alternatives and so there is little to be added by seeking Ofgem's approval.• There is no impact on current BSC parties and/or existing Metering Dispensations.• It provides a positive benefit (or no negative impact) to all parties involved in the Metering Dispensation process (in BSCP32)

Question 5: Will your organisation incur any costs in implementing P437?

Summary

Yes	No	Neutral/No Comment	Other
0	2	0	0

Responses

Respondent	Response	Rationale
Scottish Power	No	None provided.
NGESO	No	There are no changes to NGESO's responsibilities under this proposal and therefore there will no change in process/system/resource required. The timing of Metering Dispensations may be earlier than currently but we are also not expecting any change in the number of dispensation applications

Question 6: What will the ongoing cost of P437 be to your organisation?

Summary

Solution	High	Medium	Low	None	Other
Proposed	0	0	0	2	0

Responses

Respondent	Response	Rationale
Scottish Power	None	None provided.
NGESO	None	There are no changes to NGESO's responsibilities under this proposal and therefore there will no change in process/system/resource required. The timing of Metering Dispensations may be earlier than currently but we are also not expecting any change in the number of dispensation applications.

Question 7: How much will it cost your organisation to implement P437?

Summary

High	Medium	Low	None	Other
0	0	0	2	0

Responses

Respondent	Response	Rationale
Scottish Power	None	None provided.
NGESO	None	There are no changes to NGESO's responsibilities under this proposal and therefore there will no change in process/system/resource required. The timing of Metering Dispensations may be earlier than currently but we are also not expecting any change in the number of dispensation applications.

Question 8: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	I agree with the workgroup in this regard.

Question 9: Do you agree with the Workgroup's assessment that P437 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
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	Yes, I agree that there are no impacts of P437 on the EBGL Article 18 terms and conditions.

Question 10: Do you have any comments on the impact of P437 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
0	2	0	0

Responses

Respondent	Response	Rationale
Scottish Power	No	None provided.
NGESO	No	Not at this time

Question 11: Will P437 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Low	As a MEM, we believe that this change will have a positive impact in the process and for the customer.
NGESO	Low	As per our response to question 5, we expect there to be a minor impact on when NGESO receive Metering Dispensations for review (i.e. seeing them earlier than today) but we do not believe there will be any impact on current processes.

Question 12: Do you agree with the Workgroup's assessment of the impact on the consumer benefit areas?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	I agree with the workgroup's assessment of consumer benefits of P437.

Question 13: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	I agree with the workgroup that P437 should be implemented as soon as possible.

Question 14: How long (from the point of approval) would you need to implement P437?

Summary

0-6 months	6-12 months	> 12 months	None
0	0	0	2

Responses

Respondent	Response	Rationale
Scottish Power	No response provided.	None provided.
NGESO	None	No implementation is needed by NGESO due to the small impact.

Question 15: As a Registrant, how will P437 impact you?

Summary

Yes	No	Neutral/No Comment	Other
0	0	2	0

Responses

Respondent	Response	Rationale
Scottish Power	None	None provided.
NGESO	No response provided.	None provided.

Question 16: Do you agree with the Workgroup's initial views that P437 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
2	0	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	None provided.
NGESO	Yes	Yes, I agree with the workgroup's assessment of the proposal against the BSC objectives.

Question 17: Are there any other ways to stop Metering Dispensations from being submitted?

Responses

Respondent	Response
Scottish Power	No response provided.
NGESO	<p>Below are few ideas;</p> <ol style="list-style-type: none">1. Introduce a financial charge for applying. The value and rationale of this charge will need to be determined as (i) a charge aimed at recovering administration costs is unlikely to be of a significant enough value to change behaviours (ii) a significant change will change the economics of providing 'standard' metering but could be seen as punitive.2. Increasing the number/scope of deviations are considered acceptable and can be covered by a generic dispensation (e.g. a distance or loss factor if AMP and DMP are different). Whilst this won't reduce the number of 'non-standard' arrangements (and therefore dispensations), it will streamline the process of granting these dispensations.

Question 18: Do you have any further comments on P437?

Summary

Yes	No
0	2

Responses

Respondent	Response
Scottish Power	No
NGESO	No