### **CP** Consultation Responses

# CP1509 'Amend BSCP503 to add new recipients of the D0355 data flow'



This CP Consultation was issued on 10 September 2018 as part of CPC00789, with responses invited by 05 October 2018.

#### **Consultation Respondents**

Respondent	No. of Parties/Non- Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/1	Supplier Agent
Flexitricity Limited	1/1	Supplier, Capacity market aggregator
STARK	0/1	Supplier Agent
SSE Electricity Ltd	1/1	Supplier, Supplier Agent
Scottish Power	1/1	Supplier, Supplier Agent
npower	1/1	Supplier, Supplier Agent
IMServ Europe	0/1	Supplier Agent

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#### Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	*	*	✓
Flexitricity Limited	✓	×	×	✓
STARK	✓	✓	×	1
SSE Electricity Ltd	✓	✓	~	1
Scottish Power	✓	×	~	✓
npower	✓	✓	~	1
IMServ Europe	✓	✓	✓	✓

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#### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

#### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	No rationale given.
Flexitricity Limited	Yes	The solution makes the implementation of the CM more efficient by providing the CM service provider with data that they require though a channel they already receive data through, rather than manually by email. Honestly, it is slightly absurd that this wasn't the original solution.
STARK	Yes	As an agent we are finding that there is a disconnect between the EMRS expected view & the actual appointment status i.e. Suppliers are not sending the required D0354 flow in a timely manner, either retrospectively or missing completely; this applies to new registrations & change of Supplier and/or agent. This inevitably results in the expected D0357 data flows not being issued when expected and so additional benefits are that requiring the D0355 to be sent to both (EMR Settlement) Services providers.
SSE Electricity Ltd	Yes	We agree that the addition of the new recipients CM Service Provider and CfD Service Provider to BSCP503, and removal of the term EMR Settlement Service Provider/EMRSSP and replacement with the respective new recipients, are appropriate changes to ensure correct sending and receiving of the D0355 flow from the HHDA to the new recipients. We also agree that Suppliers are no longer required to send the D0355 to the CfD Service Provider and the CM Service Provider.
Scottish Power	Yes	We agree with the proposed solution.
npower	Yes	No rationale given.
IMServ Europe	Yes	No rationale given.

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Question 2: Do you agree that the draft redlining delivers the CP1509 proposed solution?

#### **Summary**

Yes	No	Neutral/No Comment	Other
7	0	0	0

#### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	No rationale given.
Flexitricity Limited	Yes	The draft red lining delivers the proposed solution.
STARK	Yes	With regards to the intentions of clarifying the requirements to send the D0355 flow to the separate recipients of "CFD Settlement Services Provider" & "CM Settlement Services Provider" the draft redlining delivers the solution, however what is not clearly identified is the market role id's to differentiate the recipients. As it currently stands with the related DTC CP 3526, HHDA send out two flows to the same market id (ESSP) on receipt of the D0354, which does not identify CFD OR CM. Will that be for the service provider to interpret based on the MPAN. What provisions are there for future requirements that would a) enable HHDA to identify the id of the Services provider if not Elexon & b) enable HHDA to identify the id of the correct recipients for the two settlement types should they be different providers (if this is a likely scenario)
SSE Electricity Ltd	Yes	No rationale given.
Scottish Power	Yes	We are satisfied that the redlining delivers the proposed solution.
npower	Yes	No rationale given.
IMServ Europe	Yes	No rationale given.

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#### Summary

Yes	No	Neutral/No Comment	Other
4	3	0	0

#### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	TMA is affected by the associated DTC change, CP1509 aligns the BSCP with the DTC, there is therefore no additional impact from CP1509 to TMA processes or systems.
Flexitricity Limited	No	No, but as a CM participant who acts on behalf of sites Flexitricity is not the supplier for, Flexitricity would benefit from the added efficiency and clarity in the data flow part of the CM processes.
STARK	Yes	Only superficial changes required by the related DTC change that facilitates the issuing of the D0355 to the new recipients, if as stated above clarification is made of the specific market role id's.
SSE Electricity Ltd	Yes	As a Supplier we will no longer be required to send the D0355 to the CfD Service Provider and the CM Service Provider because the HHDA will do this. This is a positive impact and in our view, makes the process more timely and efficient.
Scottish Power	No	We do not foresee any negative impact of CP1509 on our organisation.
npower	Yes	The impacts to both npower's HHDA and Supply roles are minimal due to the way in which npower manages the sending of the D0355.
IMServ Europe	Yes	As HHDA we are obviously now being directed to issue a copy of the D0355 flow to the CFD and CM Providers. This will involve some changes to our systems, work instructions and training. We do not consider these to be significant.

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## Question 4: Will your organisation incur any costs in implementing CP1509?

#### Summary

Yes	No	Neutral/No Comment	Other
3	4	0	0

#### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	No rationale given.
Flexitricity Limited	No	Flexitricity will incur no costs from the implementation.
STARK	No	No rationale given.
SSE Electricity Ltd	No	No rationale given.
Scottish Power	Yes	There will be a cost for implementing the change but we do not anticipate that it will be significant.
npower	Yes	Minimal costs incurred.
IMServ Europe	Yes	Development costs are quoted based on the advice from ELEXON that we can simply clone the Supplier D0355. Development cost will be 5 man days.

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### Question 5: Do you agree with the proposed implementation approach for CP1509?

#### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

#### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	TMA agrees with the 01/11/2018 proposed implementation date for CP1509.
Flexitricity Limited	Yes	The approach is sensible.
STARK	Yes	Without the above information, any implementation by 1st November can only involve sending the same flow with different message id's to same recipient which may cause unnecessary additional work for technical support, and whilst the documentation may be aligned, the delivery of the required flows may not be managed.
SSE Electricity Ltd	Yes	We agree with the proposed implementation date of 1 November 2018.
Scottish Power	Yes	Yes, we are happy with the proposed implementation approach.
npower	Yes	No rationale given.
IMServ Europe	Yes	No rationale given.

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#### CP Redlined Text

No comments were provided on the redlined text for CP1509's proposed changes to BSCP503.

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