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| Aligning BSC Reporting with EMR Regulations |
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| Aligning BSC Data with EMR Regulations - Responses |  |  |  |  |
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We invite you to respond to the consultation on aligning BSC reporting with EMR Regulations (in relation to Imports to Licensed Generation, and Exempt Supply across the Distribution Network).

Your Contact Details:

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| --- | --- |
| Respondent |  |
| Telephone contact |  |
| Company name |  |
| Number of BSC Parties represented  |  |
| Names of BSC Parties represented |  |
| Number of non-Parties represented |  |
| Names of non-Parties represented |  |
| Role of Parties/non-Parties represented |  |
| Does this response contain confidential information? |  |

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| When we present the consultation responses to the BSC Panel in November, we intend to publish your comments (unless indicated as confidential) as an attachment to the Panel paper which will be publicly available on the website. Please identify any information in your response which is confidential.  |  |
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Please provide your answers to the following consultation questions (from the consultation document). The following questions relate to Import to Licensed Generation:

|  | **Consultation Question** | **Your Response** |
| --- | --- | --- |
| **Q1.** | Do you agree with the principle that ELEXON should provide the EMR SSP with gross demand values that exclude any electricity provided to Licensed Generators for the purpose of licensed generation (in order to facilitate the approach to EMR charging specified in the BEIS/Ofgem SSFP)?Please provide rationale. |  |
| **Q2.** | Do you agree that continuing to levy CFD and CM charges on any electricity supplied to a company holding a Generation Licence for purposes that are not generation-related is appropriate (and remains consistent with the requirements of the Act)? Please provide any supporting evidence. |  |
| **Q3** | Do you agree with our proposed approach of developing a solution in two stages:* An enduring solution, developed through the BSC Modification process, that includes an agreed BSC definition of which activities should be treated as generation-related, and BSC processes (potentially similar to those proposed for Issue 70) for collecting and processing data from sub-metering; and
* An interim solution that is deliverable much earlier than the enduring solution, but relies on Suppliers to form their own view of which activities should be treated as generation-related, and cannot use data from sub-metering.

Please provide reasons for your views. |  |
| **Q4** | Do you have any suggestions on controls that should be included in the interim or enduring solutions, to provide parties with assurance that the correct energy is being treated as non-chargeable?Please provide rationale. |  |
| **Q5** | Do you agree with the principle of the interim solution being delivered using a ‘hybrid’ approach i.e. established under BSC governance but implemented in collaboration with LCCC/ESC/EMRS? |  |
| **Q6** | For Licensed Suppliers: Please provide an estimate of how many sites you supply electricity to at which a Licensed Generator is currently being charged CFD/CM charges? For Licensed Generators: Please provide an estimate of how many sites you generate electricity at where you are currently being charged CFD/CM charges? |  |
| **Q7** | Of the sites included in your response to Q6, please estimate how many would be eligible for the interim solution (i.e. Licensed Generation that has its own MPAN, rather than being ‘behind the meter’ with other on-site demand)? |  |
| **Q8** | Of the sites included in your response to Q7, please estimate the average size (kW or MW) of each site? |  |
| **Q9** | Of the sites included in your response to Q7, please provide a breakdown of the generation technologies involved (e.g. wind, diesel, PV, battery storage)? |  |

And the following questions relate to exempt supply over the Distribution Network:

|  | **Consultation Question** | **Your Response** |
| --- | --- | --- |
| **Q10.** | Do you agree that ELEXON should seek to put in place interim solutions to ensure that – where possible - licensed suppliers are not charged CFD and CM levies on exempt supply that they facilitate? |  |
| **Q11.** | Do you agree that – as an interim solution (until enduring processes for exempt supply can be put in place) – it is reasonable to treat Exports from a generation asset as non-chargeable (for CFD and CM purposes) if there is evidence that all (or almost all) of those Exports will be supplied to customers by an exempt supplier?Please give rationale for your views. |  |
| **Q12.** | Do you have any comments on this process for applying to the BSC Panel, so as to implement an interim solution?Please provide supporting rationale. |  |
| **Q13.** | For exempt suppliers: Please provide an estimate of how many generating assets you might wish to be treated as non-chargeable (over the potential two-year lifespan of an interims solution)?For Licensed Suppliers: Please provide any estimate of how many customers and/or generating assets you have registered Metering Systems for that might want to make use of an interim solution for exempt supply? |  |
| **Q14.** | Of the generating assets included in your response to Q13, please estimate the average size (kW) of each site? |  |
| **Q15.** | Of the generating assets included in your response to Q13, please provide a breakdown of the generation technologies involved (e.g. wind, diesel, PV, battery storage)? |  |

Please send your responses to to Design.Authority@elexon.co.uk by **17:00 on Tuesday 30 October 2018**.

If you have any questions on this consultation document please contact John Lucas (john.lucas@elexon.co.uk, 020 7380 4345).