

## Stage 03: Transmission Company Analysis & Assessment Procedure Consultation Questions

### P299 'Allow National Grid access to Metering System Metered Consumption data to support DSBR service'

#### Response Form

The P299 Workgroup invites you to respond to this impact assessment and consultation. In particular, it welcomes your views on the questions set out in this response form. To help the Workgroup understand your response, please provide supporting reasons for your answers where possible.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase



#### Your response

We invite you to respond to the questions in this form.



#### How to return your response

Please send responses, entitled 'P299 Assessment Consultation', to [elxon.change@elxon.co.uk](mailto:elxon.change@elxon.co.uk) by 5pm on **Friday 14 March 2014**.

## Transmission Company Analysis Questions

### Question 1

Please describe the impact(s) of P299 on your ability as a Transmission Company to discharge your obligations efficiently under the Transmission Licence and to operate an efficient, economical and co-ordinated transmission system. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

As the proposer of this modification, the Transmission Company clearly believes that P299 will have a positive impact on our ability to operate an efficient, economical and co-ordinated transmission system. The reason for this, as set out in the modification proposal, is that the MSID data is required to operate the DSBR service both at the tender assessment stage as well as for settlement in the event that the service is utilised (or if any testing is required).

### Question 2

Please outline the impact of P299 on the computer systems and processes of the Transmission Company. Include details of any changes needed as a result of implementing P299, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

Whilst we will have to make some system changes in order to implement DSBR more generally, there will not be any changes required to Transmission Company systems as a direct result of implementing P299. For example, bespoke systems are currently in development to facilitate the procurement of DSBR and will include the ability to process the P299 HH metering data.

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### Question 3

Please provide details of any consequential changes to Core Industry Documents and/or the System Operator Transmission Owner Code that would be needed as a result of implementing P299, and the lead time required for those changes. Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.

No consequential changes to Core Industry Documents or the System Operator Transmission Owner Code will be needed as a result of implementing P299.

### Question 4

Please provide an estimate of development, capital and operating costs in appropriate detail which you as the Transmission Company anticipate that you would incur in implementing P299. Where applicable, please state any difference in costs between the Workgroup's proposed solutions.

No significant costs would be incurred by the Transmission Company in implementing P299.

### Question 5

Please outline any potential issues relating to security of supply arising from P299.

P299 will have a positive impact in this area as it will enable the implementation of the DSBR service which itself is designed to help support security of supply during the mid-decade period. Therefore, if P299 is not approved there could be a negative impact on security of supply as it would disrupt and delay the implementation of DSBR and the support to security of supply it would otherwise provide.

### Question 6

Please outline your views and rationale on whether P299 would help to achieve the Applicable BSC Objectives.

As set out in the modification proposal and agreed in the Workgroup, we believe that P299 would help to achieve Applicable BSC Objective (b) - The efficient, economic and co-ordinated operation of the National Electricity Transmission System. This is because the proposed solution would ensure that DSBR tender submission data can be correctly validated and the settlement of payment process is fully supported.

We focussed on Applicable BSC Objective (b) as we felt that it was here that P299 would have the greatest impact. However, we also believe that, in better achieving (b), the proposed modification should also better achieve (a). In addition, in our opinion, it could also be argued to better achieve (d) as it introduces (as outlined on page 5 of the Assessment Consultation) further clarity on the meaning of 'relevant metering data' in section L of the BSC.

## Assessment Procedure Consultation Questions

### Question 1

Do you agree with the proposed format and content of the data submitted by HHDCs to the Transmission Company under P299?

**Yes**

If not, please provide rationale around any alternative formats or additional content.

n/a

### Question 2

Will P299 impact your organisation?

**Yes**

If 'Yes', please advised which areas of your organisation will be impacted and how they will be impacted.

As set out in the Consultation, although there is no 'direct impact' on the Transmission Company, the data received under P299 will enable us to implement the DSBR service.

### Question 3

Under the P299 solution the HHDC cost of providing the DSBR data to National Grid will be picked up by the Supplier. Do you agree with this approach?

**Yes**

Please provide your rationale.

The data to be provided to the Transmission Company under P299 is likely to be relatively small add-hoc reports which are required only infrequently. Therefore, we would not expect that the HHDCs will have to incur incremental costs (i.e. to employ extra staff) in order to provide them. However, in the unlikely event that there are any incremental costs, we believe that the most efficient process for HHDCs to recover these costs from consumers is via the existing interface with suppliers. Furthermore, as the metering data obtained under P299 will help introduce the DSBR service which in turn will help safeguard the continuity of service provided by Suppliers to their customers, we consider that the potential benefits exceed the notional costs associated with this data provision.

### Question 4

Will your organisation incur any costs in implementing P299?

**No**

Please provide your rationale.

As set out in the Consultation, there is no 'direct impact' on the Transmission Company and therefore no corresponding direct costs.

### Question 5

Do you agree with the Workgroup's proposed implementation approach?

**No**

Please provide your rationale.

The only area where we disagree slightly with the Workgroup's proposed implementation approach is with regard to the implementation date as we would prefer implementation to be "**10 days following Authority approval**" even if this approval is given on or before the 12 June 2014. This is because we would like to have the flexibility to launch the tender sooner and so for this modification to be implemented as

### Question 5

soon as possible following Authority decision. If the Authority made a decision shortly after the May panel we would not want to wait until the 26th June to implement.

### Question 6

How long (from the point of Ofgem approval) would you need to implement P299?

Please provide your rationale.

As set out in our response to Question 5 above, we are keen to begin the DSBR tender process as soon as possible following Authority approval in order to ensure that the service can be delivered for the start of winter 2014/15.

### Question 7

Do you agree that the Proposed Legal Text and BSCP502 redlining delivers the intent of the P299 solution?

**Yes**

Do you agree BSCP502 is the most appropriate location for the detailed process steps?

Please provide your rationale.

We agree that both the Proposed Legal Text and BSCP502 redlining delivers the intent of the P299 solution and our only comment on this is that it would appear that the contents of the "INFORMATION REQUIRED" field in REF 3.4.4.1 of the BSCP502 redlining should also be included in the "INFORMATION REQUIRED" field of REF 3.4.4.7.

We also agree that BSCP502 is the most appropriate location for the detailed process steps. This is because it is important to capture the exact process involved in the provision of data by the HHDCs to the Transmission Company and this is likely to be too detailed to go in the code itself. In addition, capturing the required detail in BSCP502 minimises future changes to the BSC and also provides greater flexibility if required.

### Question 8

Do you agree with the Workgroup's view that there are no feasible alternative solutions to P299?

**Yes**

Please provide your rationale and, if 'No', please provide full details of your Alternative Modification(s) and your rationale as to why it/they better facilitate the Applicable BSC Objectives.

n/a

### Question 9

Do you have any further comments on P299?

**No**

Please provide your rationale.

n/a

## Further Information

To help us process your response, please:

- Email your completed response form to [elexon.change@elexon.co.uk](mailto:elexon.change@elexon.co.uk), entering "P299 Transmission Company Analysis" in the subject line
- Include a phone number in your covering email, so that we can contact you if we have any questions
- Respond by **5pm** on **Friday 14 March 2014** (the Workgroup may not be able to consider a late response)

The Workgroup will consider your response at its next meeting.