

CP Consultation Responses



CP1480 v2.0 'Creation of a new authorisation category for corrections to Bid-Offer Acceptance Related Data'

This CP Consultation was issued on 8 May 2017 as part of CPC00777, with responses invited by 2 June 2017.

Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---------------|----------------------------------------|----------------------|
| National Grid | 1/0 | Transmission Company |
| ScottishPower | 1/0 | Generator |

Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|---------------|--------|-----------|--------|-------------|
| National Grid | ✓ | ✓ | ✗ | ✓ |
| ScottishPower | ✗ | ✓ | ✓ | ✗ |

Question 1: Do you agree with the CP1480 v2.0 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Grid | Yes | Having a clearly defined process with specific individuals who have authorisation to provide consent to BOA data corrections, will enable the TC to speed up the process and reduce the chance of settlement disputes being raised by the Trading Parties when a data error has occurred. |
| ScottishPower | No | <p>CP1480 v2 proposes the same overly bureaucratic process as the original CP1480, with the addition of increasing responsibility in a different category of Authorised Persons. The initial view from the SVG still describes less onerous alternatives.</p> <p>Although the consultation suggests that there are minimal incidents per month, our Settlements team are regularly involved in providing corrections and respond within appropriate timescales.</p> <p>It is unclear why this update would provide any benefit compared to the current method.</p> <p>Furthermore, Category A Persons are typically senior managers and are exceptionally unlikely to have any role in the correction of this operational data.</p> |

Question 2: Do you agree that the draft redlining delivers the CP1480 v2.0 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 2 | 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 |
|---------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Grid | Yes | We agree with the majority of the redlining within the documentation. We feel that the explicit consent form for Category E is unnecessary as this authorisation will exist only to be contacted by the TC for corrections to Bid-Offer Acceptance (BOA) related data. |
| ScottishPower | Yes | While we do not agree with the proposed solution for the reasons outlined above, we agree that the draft redlining would deliver the intent of the CP1480v2.0 proposed solution. |

Question 3: Will CP1480 v2.0 impact your organisation?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 2 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Grid | Yes | Having a clearly defined process with specific individuals who have the authorisation to provide consent to BOA data corrections, it will speed up the process and reduce the chance of errors entering Settlement. |
| ScottishPower | Yes | There would be an increased burden on the Settlements team and at least one senior manager and their first line reports would require to be educated to recognise these queries |

Question 4: Will your organisation incur any costs in implementing CP1480 v2.0?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Grid | No | N/A |
| ScottishPower | Yes | <p>As the proposal stands, it would be necessary to provide training or support to any Category E or A Persons if their experience and knowledge aren't suitable.</p> <p>There would be an increased cost as the Settlements team provide cover for the authorised person. These would be ongoing costs and are difficult to quantify given the ambiguous requirement.</p> |

Question 5: Do you agree with the proposed implementation approach for CP1480 v2.0?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 1 | 1 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Grid | Yes | N/A |
| ScottishPower | No | <p>Although for some participants, Category A Persons may be in a position to assist this class of query, in our case, all Category A Persons are senior managers. This would be an inappropriate query for them as they are not associated with operational matters, leading to delays and potential errors.</p> <p>There are other less cumbersome and bureaucratic options highlighted by ELEXON, the SVG and ISG.</p> |

Question 6: Do you agree that the revised timescale is reasonable for Parties to resolve BOA related data errors noting that Category "A" Authorised Persons can also be used as an escalation point?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 2 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------|----------|----------------------------------|
| National Grid | Yes | N/A |
| ScottishPower | Yes | This is not a matter of concern. |

Question 7: Do you have any further comments on CP1480 v2.0?

Summary

| Yes | No |
|-----|----|
| 1 | 0 |

Responses

| Respondent | Response | Comments |
|---------------|----------|-------------------------------------------------------------------------------------------------------------------------|
| National Grid | No | - |
| ScottishPower | Yes | We would reiterate the inappropriateness of including the broad range of Category A Persons on this operational matter. |

No comments were received on the draft redlined text to BSCP18 or BSCP38.