



Change Proposal Circular

CPC00687: Impact Assessment of CP1340 and CP1341

Change Proposal Impact Assessment Timetable 2010/2011 consultation



**Any Questions**

If you have any queries, please contact:  
**CCC@elexon.co.uk.**

Or contact:  
**BSCP40 Change  
Process Task Leader  
020 7380 4135  
stuart.holmes@elexon.  
co.uk.**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
British Energy	Generator, Trader Non Physical, CVA MOA	Yes	-	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	-	-
CE Electric UK	LDSO, UMSO	Neutral	-	-
E.ON UK Energy Services Limited	MOA NHHDC-DA (MIDE)	Yes	-	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	-	-
Western Power Distribution	LDSO, MOA, SMRA, UMSO, MA	Yes	-	-
E.ON	Supplier	Yes	-	-

CPC00687

30 September 2010

Version 1.0

Page 1 of 11

Summary of Responses				
Npower Limited	Supplier, Supplier Agents	Neutral	-	-
Scottish Power		Yes	-	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Supplier/ Generator/ Trader / Party Agent / Distributor	Yes	-	-
Siemens Metering Services	HHDC, HHDA, NHHDA, NHHDC, HHMO, NHHMO, MA, CVAMO	Neutral	-	-

---

CPC00687

---

30 September 2010

---

Version 1.0

---

Page 2 of 11

---

© ELEXON Limited 2010

Responses for CP1340 'Changes to BSCP537 Appendix 1 - Self Assessment Document (SAD) to better reflect the BSC Obligations'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
British Energy	Generator, Trader Non Physical, CVA MOA	No	No	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	No	-
CE Electric UK	LDSO, UMSO	Neutral	No	-
E.ON UK Energy Services Limited	MOA NHHDC-DA (MIDE)	Neutral	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	-
Western Power Distribution	LDSO, MOA, SMRA, UMSO, MA	Yes	No	
E.ON	Supplier	Neutral	Yes	-
EDF Energy Networks	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI)	Yes	Yes	none
Npower Limited	Supplier, Supplier Agents	Neutral	-	-
Scottish Power		Yes	Yes	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution	Supplier/ Generator/ Trader / Party Agent / Distributor	Yes and No	Yes	0

---

CPC00687

---

30 September 2010

---

Version 1.0

---

Page 3 of 11

---

© ELEXON Limited 2010

### Summary of Responses

Ltd; Medway Power Ltd; SSE Metering Ltd				
Siemens Metering Services	HHDC, HHDA, NHHDA, NHHDC, HHMO, NHHMO, MA, CVAMO	Neutral	Yes	30

### Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
British Energy	No	No	<b>Agree change comment</b> - There are four areas identified in this proposal. The first are relates to provision of PARMS. Data by CVA MOAs. I have reviewed BSCP533 and have found nowhere a requirement for CVA MOAs to provide data. All data requirements in respect of CVA MOAs are provided by CDCA. Hence there is no need to make any changes to BSCP537 in respect of controls in place to meet requirements of BSCP533. Neutral to other areas in this CP 1340 <b>Is your organisation impacted?</b> Not impacted ,provided no data submissions are required by CVA MOA
Independent Power Networks Limited	Yes	No	-
CE Electric UK	Neutral	No	-
E.ON UK Energy Services Limited	Neutral	No	<b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No
TMA Data Management Ltd	Yes	Yes	<b>Please state what the impact is</b> - We would be impacted in case of a re-qualification for the HHDC role.
E.ON	Neutral	Yes	-
EDF Energy Networks	Yes	Yes	<b>For which role is your organisation impacted?</b> – LDSO, SMRA, UMSO <b>Please state what the impact is</b> - Removal of restrictions on UK based companies.
Npower Limited	Neutral	-	-
Scottish Power	Yes	Yes	<b>For which role is your organisation impacted</b> - Supplier, HHDC, HHDA, MOA <b>Please state what the impact is</b> - Documentation changes only <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No

CPC00687

30 September 2010

Version 1.0

Page 4 of 11

© ELEXON Limited 2010

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Yes and No	Yes	<p><b>Agree change comment</b> - With regards allowing Directors outside of UK being able to sign off documents, we believe that Elexon should seek legal guidance. We are comfortable within European Community but outside of Europe, we need that legal assurance before we accept this amendment. We have no issues with the other proposed amendments.</p> <p><b>For which role is your organisation impacted</b> - Supplier, Party Agents</p> <p><b>Please state what the impact is</b> - Minimal procedural changes</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
Siemens Metering Services			<p><b>For which role is your organisation impacted</b> - HHDC, CVA MO</p> <p><b>Please state what the impact is</b> - This would only impact us if we were to go through Re-Qualification</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact</p> <p><b>Associated costs</b> - No additional costs would be incurred.</p> <p><b>Any other comments</b> - For anyone already going through the Qualification or Re-Qualification process during February 2011, would they be required to resubmit any of the Self Assessment Documentation, following the updated SAD version released in February (i.e. the additional questions for HHDCs and CVA MOs)?</p>



**About Severity Codes**

**H (High):**  
Prejudices document's conclusions, recommendations or fitness for purpose.

**M (Medium):**  
Matter of substance, but not high.

**L (Low):**  
Minor error but document's intention is clear.

**No comments on the redline text**

CPC00687

30 September 2010

Version 1.0

Page 5 of 11

© ELEXON Limited 2010

## Responses for CP1341 'Unmetered Supplies: Accommodating Multi-Level Static Dimming Devices in Half-Hourly and Non-Half Hourly Settlement'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	Yes	-
CE Electric UK	LDSO, UMSO	Neutral	Yes	60
E.ON UK Energy Services Limited	MOA NHHDC-DA (MIDE)	Neutral	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes		
Central Networks	UMSO	Yes	Yes	180
Western Power Distribution	LDSO, MOA, SMRA, UMSO, MA	No	Yes	180
E.ON	Supplier	Yes	Yes	180
EDF Energy Networks	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI)	Yes	Yes	180
Npower Ltd	Supplier, Supplier Agents	Neutral	-	-
Scottish Power		Yes	Yes	30
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution	Supplier/ Generator/ Trader / Party Agent / Distributor	Yes	Yes	6 months

---

CPC00687

---

30 September 2010

---

Version 1.0

---

Page 6 of 11

---

© ELEXON Limited 2010

Summary of Responses				
Ltd; Medway Power Ltd; SSE Metering Ltd				
Siemens Metering Services	HHDC, HHDA, NHHDA, NHHDC, HHMO, NHHMO, MA, CVAMO	Yes	Yes	180

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Independent Power Networks Limited	Yes	Yes	<p><b>For which role is your organisation impacted? – UMISO</b></p> <p><b>Please state what the impact is</b> - There will be a small process change to IPNL's process for street lighting but this is not expected to have a detrimental impact.</p> <p><b>Any other comments</b> - The success of the CP depends on the information being successfully and accurately provided by the customer. Our experience to date has shown that none of the NHH inventories we have received have previously made reference to dimming capability.</p>
CE Electric UK	Neutral	Yes	<p><b>For which role is your organisation impacted? – UMISO</b></p> <p><b>Please state what the impact is</b> - Inventory processing – and use of additional charge codes. Also may have an impact on physical auditing.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs</b> – not applicable.</p>
E.ON UK Energy Services Limited	Neutral	No	<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
TMA Data Management Ltd	Yes	No	-
Central Networks	Yes	Yes	<p><b>Please state what the impact is</b> - Our Unmetered Inventory Processing System will have to be modified to accept 3 digit alpha-numeric switch regime codes. Although on the face of it, this would appear to be a fairly minor change, our system already carries significant validation of charge code/switch regime combinations and in addition uses the switch regime code to determine the appropriate NHH profile, LLF Class, allocate additional MPANs where necessary, produce certificates, etc. On this basis our system will need significant checking and changes to cope with the change from numeric to</p>

---

CPC00687

---

30 September 2010

---

Version 1.0

---

Page 7 of 11

---

© ELEXON Limited 2010

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
			<p>alpha-numeric.</p> <p><b>Please explain the lead time:</b> 180 days - Significant changes are required to our systems as described above.</p> <p><b>Associated Costs:</b> Detailed costing of the changes have not been made, but based upon the last major changes that were made, we anticipate costs of at least £10,000.</p> <p><b>Any other comments:</b> It would be useful if a fuller explanation of the interim solution described in paragraph 8 could be given. My reading of this is that if equipment can be shown to produce results that would equate to annual hours for an existing regime for one of the half night switch regimes, then that half night regime shall be used and the EAC will traded in the half night profile, rather than the dusk-dawn profile. The profile is determined by the switch regime within our system. If that is the case I would expect to see some guidance note confirming this arrangement published by Elexon.</p> <p>It is suggested that the implementation date is voluntary and that an UMSO/MA does not have to meet the obligation, but that the UMSO/MA runs the risk of customers appointing another UMSO/MA in their place. This is fine for the MA role which is competitive, but the UMSO is an agent of the LDSO and cannot be changed. I would suggest there has to be a date by which an UMSO must be compliant.</p>
Western Power Distribution	No	Yes	<p><b>Agree change comment -</b> We are happy with most of the proposal including the facility for there to be up to 8 switching times per day per switch regime.</p> <p>However we do not agree with the proposal for there to be up to 4 different seasons for a switch regime. Having more than one season per switch regime would significantly increase the cost of the necessary development work. We are not sure where the proposal for multiple seasons has come from and believe this aspect of the change should be subject to further discussion at UMSUG.</p> <p><b>Please state what the impact is -</b> UMSO &amp; MA - Significant I.T development and amendment to manual processes</p> <p><b>Please explain the lead time -</b> Significant I.T development and amendment to manual processes.</p> <p><b>Calendar days 180 -</b> We could implement by the proposed date of June 2011</p> <p><b>Would implementation in the proposed Release have an adverse impact on</b></p>



Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
			<p><b>your organisation?</b> No</p> <p><b>Associated costs</b> - Approx £10K to £20K for development work, depending on whether switching times are year round or seasonal</p>
E.ON	Yes	Yes	<p><b>For which role is your organisation impacted?</b> – Supplier</p> <p><b>Please state what the impact is</b> - Updates to our UMS System</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No as it is optional</p> <p><b>Associated costs</b> – Not available.</p>
EDF Energy Networks	Yes	Yes	<p><b>Agree change comment</b> - The proposals appear considerably refined / improved over those in DCP0046. Whilst this will still have a negative impact on the accuracy of UMS consumption calculations this has been mitigated so far as possible.</p> <p><b>For which role is your organisation impacted?</b> – UMSO + LDSO</p> <p><b>Please state what the impact is</b> - Software changes to permit alpha-numeric Switch Regimes and automated validation of permitted Charge Code / Ballast / Switch Regime Combinations. Process changes and training to support this additional complexity. Education of customers who will demand energy benefits without supplying genuine, valid Elexon-approved data.</p> <p><b>Please explain the lead time</b> - The CP describes the facilitation of CP1341 by UMSOs/MAs as optional. We are not mandated to have the capability in place by 30 June 2011 or any future date. While I can understand this in respect of MAs (where customers can change agent) this doesn't make such sense for UMSOs (where they can't). So, is facilitation of CP1341 really optional for UMSOs? If not, what is the true deadline by which we must comply?</p> <p><b>Any other comments</b> - The accuracy of timing of switching/dimming of events is not mentioned in the CP although it is picked up in Section 3.6 of the OID. Whilst perhaps secondary to the accuracy of % energy dimming values this is still important. Recent analysis of controllers supporting single-stage dimming have identified wide variations in accuracy and variability between different manufacturer's products.</p>
Npower Limited	Neutral	-	-

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Scottish Power	Yes	Yes	<p><b>Agree change comment</b> - ScottishPower fully support the CP. The CP is an appropriate and measured response to introducing such devices into UMS. In regards to point 7 we can see no reason not to allow 8 stages in a 24 hour period and though it does appear excessive to us, if it is anticipated that there may be demand for such flexibility then we would be supportive of this.</p> <p><b>For which role is your organisation impacted?</b> – UMSO</p> <p><b>Please state what the impact is</b> - Internal process changes</p> <p><b>Please explain the lead time</b> - Our current system can already manage alpha-numeric switch regimes. Therefore we would not require a long lead time.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No. We are of the opinion that an earlier implementation date than the proposed June 2011 date would be advantageous. As implementation will be voluntary and at the discretion of the UMSO/MA it would seem appropriate to allow an earlier adoption for those who will be ready by Feb 2011. It would also reduce any impacts that emerge from using the interim solution.</p> <p><b>Associated Costs</b> - Not available at this time though costs are expected to be low.</p> <p><b>Any other comments</b> - The establishment of the interim solution needs to be carefully considered to ensure that it does not lead to Customers not declaring the devices as and when an UMSO can accept them post-implementation. A robust solution must also be established to ensure that a record of these interim installations is recorded. The CP suggests that Elexon will supply the Customer with a new switch regime. How will this process be managed and where is the contact point with the relevant UMSO?</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Yes	Yes	<p><b>For which role is your organisation impacted</b> - Supplier, UMSO, MA</p> <p><b>Please state what the impact is</b> - Changes to processes and systems</p>

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Siemens Metering Services	Yes	Yes	<p><b>Agree change comment</b> - We support this proposal being optional (i.e. the voluntary implementation)</p> <p><b>For which role is your organisation impacted?</b> – MA</p> <p><b>Please state what the impact is</b> - This would require software changes to LAMP.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact and we would support the voluntary implementation.</p> <p><b>Associated costs</b> - The costs for development and testing (for LAMP) would be in the region of £10 - £15,000</p>

**No comments on the redlined text**



**About Severity Codes**

**H (High):**  
Prejudices document's conclusions, recommendations or fitness for purpose.

**M (Medium):**  
Matter of substance, but not high.

**L (Low):**  
Minor error but document's intention is clear.