

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 'P280 Assessment Consultation' to modifications@elxon.co.uk by **5pm on 2 March 2012**

P280 Assessment Consultation Questions

13 February 2012

Version 1.0

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Stage 03: Assessment Consultation Questions

P280: Introduction of New Measurement Classes

Response Form

The P280 Modification Group invites you to respond to the P280 consultation. In particular, we would appreciate your responses to the following questions and your reasons for those answers.

We encourage you to provide financial information showing the costs and benefits of this Modification Proposal on your business. We will use this information to help us to assess this change. ELEXON can treat this information as confidential if requested, although we will provide all information to Ofgem.

Your Details

Respondent:	Your name
Company name:	Your company name
Number of BSC Parties represented	Please give the total number of BSC Parties on whose behalf you are responding (including your own organisation if relevant)
Names of BSC Parties represented	Please list the names of all BSC Parties on whose behalf you are responding (including the name of your own organisation if relevant)
Number of non-Parties represented	Please give the total number of non-Parties (e.g. Party Agents, consultancies) on whose behalf you are responding (including your own organisation if relevant)
Names of non-Parties represented	Please list the names of all non-Parties on whose behalf you are responding (including the name of your own organisation if relevant)
Role of Parties/non-Parties represented	Please state the industry role of the Parties/non-Parties on whose behalf you are responding (including the role of your own organisation if relevant) – e.g. Supplier/Generator/Trader/Consolidator/Exemptable Generator/BSC Agent/Party Agent/Distributors/other – please state
Does this response contain confidential information?	If yes, then please clearly show which information is confidential.

Assessment Questions

Question 1:

Response:

What would be the impact on your organisation of continuing to settle on a site-specific basis if the number of half-hourly sites below 100kW increases? Respondents should focus on the impacts related to site-specific billing of distribution charging, in line with the purpose of this modification.

Please explain the reason(s) for your view and which Applicable BSC Objective(s) your views are based on:

Insert rationale here

Question 2:

Response:

What costs would your company face if the number of sites settled on a half-hourly basis increase in line with the scenarios below? Respondents should focus on the impacts related to site-specific billing of distribution charging, in line with the purpose of this modification. Please provide a detailed breakdown of costs wherever possible, specifying whether these are one-off or on-going costs. Please also explain the assumptions underlying your costs estimates

- Increase of 30% HH Settled customers below 100KW
- Increase of 50% HH Settled customers below 100KW
- Increase of 75% HH Settled customers below 100KW

Please explain the reason(s) for your view:

Insert rationale here

Question 3:

Response:

Do you agree with the proposed criteria for separating the new Measurement Classes based on whether the site is Domestic, Non domestic whole current or Non domestic CT metered?

Please explain the reason(s) for your view:

Insert rationale here

Question 4:

Response:

Do you agree that use of the new data flows should be optional for HHDA's, or should it be mandatory (to ensure that Distributors receive data for all Metering Systems)?

Please explain the reason(s) for your view:

Insert rationale here

Question 5:**Response:**

Do you believe there is an alternative approach to transferring information between participants that the group should consider?

Yes/No

Please explain the reason(s) for your view:

Insert rationale here

Question 6:**Response:**

Do you agree with the Group's proposal that aggregated consumption data for the new Measurement Classes should be reported in the existing NHH D0030 and D0314 formats (with Half Hourly data allocated to the Time Pattern Regimes of an appropriate SSC for reporting purposes)?

Yes/No

Please explain the reason(s) for your view:

Insert rationale here

Question 7:**Response:**

Does the proposed restriction to local time SSCs with switching times on half hour boundaries cause you any issues?

Yes/No

Insert rationale here

Question 8:**Response:**

Do you envisage using the same LLFCs for NHH and HH customers? If so, does the proposal to report these as separate records on the D0030 create any issues for you?

Yes/No

Insert rationale here

Question 9:**Response:**

Do you believe that LDSOs need to receive data for HH customers under the new Measurement Classes? If yes does there need to be a central method to enable LDSOs to identify aggregated customers to avoid double charging, or do you believe LDSOs would be able to achieve this themselves?

Yes/No

Insert rationale here

Question 10:**Response:**

If the HHDC does provide data, what format should it be in: D0010, D0036/D0275, D0036/D0275 equivalent with new flow numbers, or D0036/D0275 with Measurement Class added?

Yes/No

Insert rationale here

Question 11:**Response:**

Are there other options that the group should consider? i.e. do not send a D36 to DNO for MPANs in new MC?

Yes/No

Insert rationale here

Question 12:**Response:**

What would be the impact on your organisation specific to the implementation of this requirement by 31st March 2013?

Yes/No

Insert rationale here

Question 13:**Response:**

Would Proposed Modification P280 impact your organisation (including potential requirement 6) If so, Please provide a detailed breakdown of costs wherever possible, specifying whether these are one-off or on-going costs. Please also explain the assumptions underlying your costs estimates.

Yes/No

Insert rationale here

Question 14:**Response:**

Do you agree with the Workgroup's proposed implementation approach and the Implementation Date of 31 March 2013?

Yes/No

Insert rationale here

Question 15:**Response:**

Do you have any views regarding the alternative approached discussed by the Group?

Yes/No

Insert rationale here

Question 16:**Response:**

Are there alternative solutions that the Modification Group has not identified, that they should consider?

Yes/No

Insert rationale here

Question 17:**Response:**

Do you believe that P280 better facilitates the Applicable BSC Objectives compared with the current Code provisions?

Yes/No

Insert rationale here

Further Information

To help us process your response, please:

- Clearly mark any confidential information;
- Email your completed response form to modifications@elexon.co.uk;
- Include "P280 Assessment Consultation" in the subject line of your email;
- Include a phone number in your covering email, so that we can contact you if we have any questions; and
- Respond by **5pm on Friday 2 March 2012** (the Workgroup may not be able to consider late responses).

The Workgroup will discuss your response before making a recommendation to the Panel in April 2012 on whether to approve P280.

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