

## Change Proposal Circular – CPC00727 Responses

CPC00727: Impact Assessment of CP1360

### Summary of Responses for CPC00727:

ORGANISATION	IMServ Europe Ltd	Western Power Distribution	Electricity North West Limited	SSE Energy Supply Ltd	EDF Energy	British Gas	Northern Powergrid	ScottishPower	TMA Data Management Ltd	Southern Electric Power Distribution & Scottish Hydro Power Distribution	Npower
<b>Agree with the change?</b>	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
<b>Impacted?</b>	Yes	No	No	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
<b>Cost?</b>	Low Cost	No	No	No	No	Minimal	No	Unknown	Low Cost	No	Low Cost
<b>Imp Date</b>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes

Detailed Impact Assessment Responses CP1360	
Organisation	Responses/Comments
IMServ Europe Ltd	<p><b>How is your organisation impacted?</b> – As an NHHDC we would need to implement these record keeping proposals.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – The costs would be Low overall, but there would be IT development and extra initial and ongoing user costs.</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes – we would need 6 months’ notice so as long as this is approved by end of May 2013 then Nov 2013 is achievable</p> <p><b>Any other comments?</b> Think this is a massively administrative and complicated proposal for what is a relatively small issue in overall industry terms. As other people have previously noted, the Risk Evaluation Methodology is already in place under the PAF to ensure that areas of significant risk are included within the audit, so why should we bypass this agreed framework and place such significant focus on this minor issue.</p>
Western Power Distribution	<p><b>Agree with the implementation approach? If not, why?</b> – Yes</p> <p><b>Any other comments?</b> Agree with the change because it will provide clearer requirements for retention of data to support future investigations in to use of GVC</p>
Electricity North West Limited	<p><b>Agree with the implementation approach? If not, why?</b> – Yes, because the responses to the original impact assessment suggested parties would need at least 6 months to implement therefore November 2013 is a sensible approach.</p> <p><b>Any other comments?</b> Agree with the change because obligating NHHDC’s to retain audit records for GVC’s and Dummy Meter Exchanges will make the use of these processes by Suppliers and their agents more transparent and auditable.</p>
SSE Energy Supply Ltd	<p><b>How is your organisation impacted?</b> – Additional resourcing required</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – None</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p>

EDF Energy	<p><b>How is your organisation impacted?</b> – Minor changes will be required to our business processes and the template we use</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – None, no extra costs are expected to be incurred, this will be just a minor change to process and templates</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p>
British Gas	<p><b>How is your organisation impacted?</b> – Minor changes to documentation</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Minimal Cost</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p>
Northern Powergrid	<p><b>Agree with the implementation approach? If not, why?</b> – Yes</p> <p><b>How is your organisation impacted?</b> – Not directly impacted, but we are well aware that settlement correction techniques have the potential to create significant volatility in the data we receive and rely on for billing purposes as a DNO. Therefore we agree that the use of such techniques should be monitored closely.</p> <p><b>Any other comments?</b> – We see this as an important change for ensuring that these techniques are only used in an appropriate manner and verifiable way. The use of these techniques appears to have increased dramatically over recent years, which has had a significant impact on the settlement data we receive as a DNO. This change will strengthen the controls over these techniques which we think is important in the light of their increased use.</p>
ScottishPower	<p><b>How is your organisation impacted?</b> – Additional resource, time and potential system impacts for all existing 'Supplier Adjustment' processes.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Unfortunately at this time we are not able to quantify the cost to implement this change.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No, we believe that the proposed implementation date of 7<sup>th</sup> November 2013 is unachievable due to the fact that we require a minimum timeline of six months to ensure that we can establish</p>

	<p>the full end to end and update our internal systems to accommodate this change. It is therefore our preference to delay the implementation of this CP until February 2014.</p> <p><b>Any other comments?</b> – We believe the revised solution clearly outlines the audit obligations for Suppliers and their agents in relation to the use of GVC and dummy meter exchanges, which was not the case with the original CP. These obligations will also allow for consistency, in use, and transparency when using these techniques.</p>
<p>TMA Data Management Ltd</p>	<p><b>How is your organisation impacted?</b> – Impact on local working procedures.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Low cost</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p> <p><b>Any other comments?</b> – Agree with the change because the use of standardised requirements ensures that the Industry has a common approach and that monitoring of the GVC and Dummy Meter Exchange processes is facilitated.</p>
<p>Southern Electric Power Distribution &amp; Scottish Hydro Power Distribution</p>	<p><b>How is your organisation impacted?</b> – We see a positive impact as there would be more accurate data for settlements.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – No cost</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p>
<p>Npower</p>	<p><b>How is your organisation impacted?</b> – As a Supplier &amp; NHHDC, we currently utilise the corrective techniques to make adjustments to Settlement data in order to ensure that the correct volume of energy is settled.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Our current audit records would need slight amendments to cater for additional items such as Meter Multiplier and CT ratio. However, costs associated with these amendments are negligible.</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p>



## Summary of Comments on BSCP504 redlining

Organisation	Document name & location	Comment	ELEXON's recommendation
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**There were no comments received on the Proposed BSCP504 redlining.**