

Responses from P63 Definition Consultation

Consultation issued 20 February 2002

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
1.	Powergen	P63_DEF_001	4
2.	TXU Europe	P63_DEF_002	14
3.	IMServ Europe	P63_DEF_003	N/a
4.	LE Group	P63_DEF_004	4
5.	Seaboard Energy Limited	P63_DEF_005	1
6.	SEEBOARD Power Networks	P63_DEF_006	1
7.	Western Power Distribution	P63_DEF_007	2
8.	SP Energy Retail Ltd	P63_DEF_008	5
9.	Scottish & Southern Energy	P63_DEF_009	4
10.	British Gas Trading Ltd	P63_DEF_010	4
11.	Innogy plc	P63_DEF_011	9
12.	Association of Meter Operators	P63_DEF_012	N/a
13.	GPU Power (UK)	P63_DEF_013	1

P63_DEF_001 – Powergen

Respondent:	Paul Jones
Responding on Behalf of	Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited and Cottam Development Centre Limited
Role of Respondent	Supplier/Generator

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
<p>Rationale: The breadth of use of the bulk process should be related to the risk posed by using the process. The greater the risk the narrower the circumstances under which it should be used. If the potential risk is significant, then the process should only be used for those instances where the risk of not using it is greater. For example, this may mean only using it in the event of agent and/or supplier failure.</p>		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
<p>Rationale: This links into the failing supplier process which is contained in the BSC, although it could be used wider in relation to an event of agent failure etc. There could be implications for the MRA.</p>		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
<p>Please state what the issues are: At present the proposal is low in detail on how the process would work. There are issues of cost, timescales for implementation, impact on agent systems, risk to settlement and the effect of other proposed changes to be considered.</p>		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes *</p> <p>Possibly **</p>

	Processes	
<p>Rationale:</p> <p>* d) there will be an impact from P62.</p> <p>** e) this would be dependent on the complexity of the process and the potential risk to settlement.</p>		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
<p>Please outline your views: Either 6.1 or 6.2 with a view to minimising the change to existing processes.</p>		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
<p>Costs of any solution for the whole industry need to be carefully considered. Against this needs to be weighed the potential risk of not having the solution in place (for example in the case of an agent failure)</p>		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	See below.
<p>Please state your views: Preference would be for a) or b). This view is based on a desire to see changes kept to a minimum. The nature of changes undertaken under b) would need to defined more clearly before we could comment on whether the process was acceptable or not.</p>		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	
<p>Please state your comments If this goes wrong there is a potential for other suppliers to be affected through their imbalance positions and/or by disrupting the change of supplier or change of agent processes. The potential significant risks to settlement and supply/agent competition, along with the potential benefits, need to be considered carefully before implementation. This is not necessarily a change which should be rushed into.</p>		

P63_DEF_002 – TXU Europe

Respondent:	Terry Marquand
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). TXU – 14 BSC Parties
Role of Respondent	Supplier

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: It should be possible to migrate to new agents in a shorter timescale than is currently possible.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Not necessarily
Rationale: The objective is to enable suppliers to put commercial decisions into practice more quickly and easily.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
Please state what the issues are: Has the successful and unambiguous transfer of data from old to new agents been fully recognised as a prerequisite for any transfer?		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	<p>(a) Yes. Bulk CoS cannot be contemplated.</p> <p>(b) Yes.</p> <p>(c) Only needed for NHH. If applied to HH, must take account of HH Mops under contract to customers.</p> <p>(d)</p>

		Reasonable & pragmatic. (e) Not necessarily.
Rationale: The drivers should be effectiveness, low cost and simplicity.		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
Please outline your views: As stated as answers to Q7		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
Keep it cheap.		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	<p>(a) Yes. "Raise significantly", rather than "remove". Applies to agents as well as SMRA.</p> <p>(b) Yes. Allow existing flows on CD-ROM instead of DTN.</p> <p>(c) No. Superficially attractive; likely to be an absolute nightmare.</p> <p>(d) Unconvinced; but need to consider defaulting agent. Out of Scope of P63?</p> <p>(e) No. Re-writing 1998 & TA2000 not a realistic option.</p>
Please state your views:		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	Yes

Please state your comments

The solution must be effective, and must not impose unwarranted additional costs on participants.

If a solution is implemented and is not effective, it could end up being a huge barrier to competition.

P63_DEF_003 – IMServ Europe

Respondent:	IMServ Europe
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). IMServ Europe
Role of Respondent	Data Collector/Data Aggregator/ Meter Operator Agent

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: The current process was implemented without serious consideration of BTPs and it has been found to be difficult to operate in these circumstances and therefore we agree that some modifications or guidelines will produce a benefit. At present it is not possible to impact assess the options and therefore further work by the expert group should be conducted to further explore the possible process designs and issues to enable benefits analysis to be undertaken.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
Rationale: This process could lead to the largest single daily movements of Supplier Volume moving between party agents, with a high ratio of settlement volume to transactions – particularly if a ‘super flow’ approach is taken. A small error in the process could lead to a large material settlement error occurring. The BSC is the most suitable place for any obligations to be laid down, preserving the process. The commercial strategies of individual companies will differ and some parties may not wish to develop bulk transfer mechanisms if they do not plan for them to be utilised. The code should reflect this optionality so as not to enforce development costs where a party would only use the process in the case of insolvency.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
Please state what the issues are: 1) Multiple distribution businesses within a single GSP group – The outcome of any future mod in this area will have an impact on P63, and vice versa. The method of communicating the PDSO between Suppliers and other Party Agents will have to include a bulk change capability		

<p>2) Concurrent Bulk Changes – any processes that are introduced should ensure that a single party agent does not have to undergo more than one bulk change in a defined time period (10WD?). If this is not invoked, a risk to Supplier Volume will arise if the agent cannot deal with multiple concurrent bulk CoAs.</p>		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	<p>a) Yes</p> <p>b) Yes</p> <p>c) No -</p> <p>d) Yes.</p> <p>e) Not possible to determine at present</p>
<p>Rationale:</p> <ol style="list-style-type: none"> 1. Bulk CoA should be prohibited from coinciding +/- 10WD from CoS. The processing requirements on NHHDCs will be too great unless LD waivers can be included bilaterally. 2. Yes 3. No - Any new process should only apply to NHH SVA Metering Systems. HH volumes are too low and their inclusion may lead to a compromised solution. 4. Yes. Bulk change implies a high number of similar transactions – not merely a high number of transactions 5. As previously stated, this process will pose some of the biggest risks to Supplier Volume however it is not possible to prescribe the levels of re-certification etc required until the solution is implemented. For example should a process be implemented which mirrors the current process but removes the restriction to use the DTN the implications will be much lower than the re-design of data flows.t 		
Q5	<p>Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)</p>	
<p>Please outline your views:</p> <p>Existing CoA processes could not cope with the intended CoA. For IMServ the impacts are greatest on NHHDC – needing to produce a vast amount of history and new EAC/AA information being the most intensive step.</p> <p>Any process that occurs outside the DTC and the current process framework would be expensive/complex to implement would have to stand up to audit scrutiny, and is therefore not</p>		

desirable. This does not however mean that the DTN must be used for data transmission. The idea of combining some current flows to form new Bulk CoA flows and slimming down the amount of data passed presents the best opportunity e.g. providing one set of information from D0155 and D0148 and creating a flow with one set of groups and a list of MPANs/REGIs. This way instead of a transaction taking 1,000,000 lines for 100,000 MPANs could instead take 100,010. If this could be done across all interfaces (SMRS interfaces being key), then there may be no need for major process changes as the information needed to be passed within the high volume interfaces is greatly reduced, and the determining factor for the speed of the process is moved from the national interfaces to individual participant systems, which is a matter for those participants to test and comply with any new EPT.

Another process area that could be analysed for bulk CoA in this way, is the requirement on NHHDCs to send EAC/AA information to new NHHDCs or history to new NHHDCs. This could have an extended timescale, as the impact (Higher numbers of CAEACs at IS) is on the Supplier initiating the change, although suppliers may see this as anti-competitive. The contents of the D0019 flow could also be pared down, although this may require a change to NHHDC if a new instruction type is needed; and there could be a new flow with just the most recent EAC/AA information in [A D0152-lite] that allows the pertinent information to get into settlements while allowing the old NHHDC more time to generate the full history.

NHHMO impact is limited to processing new agent details and generating a single set of meter technical details. Bulk CoA should not provide an insurmountable hurdle, even though new local processes would need to be employed.

In summary either the proposal in 6.2 or in 6.1 is IMServ's desired solution, as it makes the minimum framework changes necessary to circumvent the technical volume constraints, but maintains the current high level process and concept, varying the data format and method of transmission. No detail is given on the discussion regarding a new process (6.5) and therefore we cannot comment on this option.

Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	
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Should option 6.1 be pursued the costs would be minimised, subject to any future upper volume limits being agreed. Costs for new processes cannot be evaluated until further detail is available.

These changes shall impact all parties and if correctly defined should also provide benefit to all and therefore it is anticipated that individual parties would be responsible for their implementation costs.

The alternative to implementing P63 is that bespoke processes and procedures would be required to be developed each time a trigger event occurs. Whilst these are infrequent the cost of such bespoke development is anticipated to be higher.

Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in</p>	
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	Section 6.4 of the this document) e) Develop a completely new process (as outlined in Section 6.5 of this document)	
Please state your views:		
6.1 – Volumes still restricted by technical issues but further analysis should be performed.		
6.2 – Second Desired Solution.		
6.3 – IMServ would be averse to allowing access to it's core portfolio in order to synchronise DB updates. If this were to be suggested for this process, there are many other processes that would provide a bigger benefit to Supplier Volume if synchronisation was allowed.		
6.4 – Agree with paper in that this is only really a viable option for agent failure		
6.5 – A process already exists. The constraints are technical rather than theoretical and given the thoughts outlined above, a new process should not be necessary.		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	
Please state your comments		

P63_DEF_004 – LE Group

Respondent:	LE Group
Responding on Behalf of	London Electricity plc, SWEB Ltd, Jade Power Generation Ltd and Sutton Bridge Power Ltd.
Role of Respondent	Several: Supplier/Generator/Data Collector/Data Aggregator/ Meter Operator Agent/Distribution Business

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: Generally we accept the arguments presented in the paper. However, there is a balance to be struck between a Supplier's desire for bulk change of Agent Appointment and the requirements of the Agents to manage large changes to their databases. Whilst we do not advocate (at this stage) writing transfer size limits in to the Code, we do think there is a case for establishing a 'working agreement' for the maximum volume of change in one go. It is because of the potential for rejections and errors, that we think it wise to have a volume limit.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
Rationale: It follows that if this facility is to be made available, then it will have to be available to all. The only way of ensuring this is through an obligation in the BSC.		

Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
<p>Please state what the issues are:</p> <p>Simply changing 'A' to 'B' is not an option, as data needs to be checked for consistency and validity both in IT terms and content terms. The process must allow time for potential errors and rejections to be notified.</p> <p>We believe that the impact on SOLR plans should be investigated.</p> <p>There are potentially major system problems. Obviously sending bulk flows will slow down the processing time and there may be an impact on other batch runs. Whilst a single flow of several million can theoretically be handled it would not be efficiently handled - multiple files are efficient which implies some sort of limit per day.</p> <p>For a DA change with D0148s it could take over a month to load a couple of million via validation routines and DC. There would also be D0019s to send out. For loss of DC the situation would probably be worse as D0151s and D0170s would have to be processed and then D0010s and D0152s produced. Under the situation of Supplier of Last Resort for example, we would expect to ask for batch runs of this order, to keep batch runs within manageable bounds.</p> <p>We would like to see some other method than a data flow being used for bulk data. The problem is that sequential loading on flat files does not necessarily validate the structural and logical data first.</p> <p>The impact on agents is that we have already seen backlogs being caused by some suppliers holding back flows then releasing them in bulk. For agents this may cause resourcing problems where errors in the data need to be manually investigated and any quality issues fed back to the supplier before any further data transfers are made. The limit of 20,000 has worked well.</p> <p>As it is necessary to consider the lowest common denominator between system limits and agent limits we would like to keep the 20,000 limit intact.</p>		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	<p>Yes</p> <p>Yes</p> <p>No</p> <p>Yes</p> <p>Yes</p>

Rationale:

- (a) We think it wise to 'exclude coincident CoS' for the sake of leaving a more easily followed audit trail.
- (c) Because the number of HH Party Agent changes will be low and the materiality per MS that much higher, we believe that existing processes are adequate.
- (e) The consequences of the process going wrong would be severe. We therefore believe that the disciplines brought about by the Accreditation and Certification processes should apply.

Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	
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Please outline your views:
We think the Definition Report gives a good range of implementation options that we would like to see further developed in the Assessment Phase.

Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	
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We think that this is more appropriately addressed at the Assessment Phase.

Q7	To what extent do you think that it is appropriate to <ul style="list-style-type: none">a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)e) Develop a completely new process (as outlined in Section 6.5 of this document)	
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Please state your views:
We would wish to see these options examined more thoroughly in the Assessment Phase.

Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	
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Please state your comments

Liz Anderson
Energy Strategy & Regulation Manager
London Electricity Group
27 February 2002

P63_DEF_005 – Seeboard Energy Limited

Respondent:	Dave Morton
Responding on Behalf of	Seeboard Energy Limited
Role of Respondent	Supplier

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: A number of large group customers are choosing their own Agents. This indicates there is a need to put together a bulk transfer process for Agents.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
Rationale: To ensure settlement issues do not become compromised such an obligation should be used and references to BSC Procedures used wherever possible.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
Please state what the issues are: Will Bulk transfers be available for all registration flows required for a change of agent? i.e D0205's and D0148/131 etc. Will we receive meter technical details as a bulk transfer also?		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p>	<p>No</p> <p>Yes</p> <p>No</p> <p>Yes</p>

	e) Should introduce new Accreditation / Certification /Entry Processes	Yes
Rationale:		
If a large group of customers is lost then this tool could be very useful in deappointing Agents in a timely manner. A constraint on the number of MPANs included in bulk transfers will help cost and staffing issues. This should also be included in the accreditation and certification entry process for all Agents making a fairer and varied choice for customers when choosing Agents.		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
Please outline your views:		
Varying existing process would be the preferred option and would be less costly and would not impact staffing and training issues.		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
These changes are likely to be costly to implement. Views on this will issue need to be examined again depending upon the final solution recommended.		
Q7	To what extent do you think that it is appropriate to	
	a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?	No
	b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)	Yes
	c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)	No
	d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)	Yes
	e) Develop a completely new process (as outlined in Section 6.5 of this document)	No
Please state your views:		
We believe that moving volume constraints will not cover all eventualities from the existing process, whereas development and revision of the existing process should. A synchronised database is not supported, as we do not believe this would provide a suitable audit trail. As per section 6.4 we do agree with this but only to be used as a last resort. There would be no need to develop a new process but it could lead to unnecessary costs, time and resources.		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	Yes

Please state your comments

The change of agent process requires a number of flows to be sent. The bulk transfer must be available to all parties for all flows. Otherwise this may impact on the supplier's billing i.e. not receiving Meter Technical Details in a timely manner.

P63_DEF_006 – SEEBOARD Power Networks

Respondent:	Dave Morton
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). SEEBOARD Power Networks
Role of Respondent	Distribution Business/SMRS

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: There are several issues that need to be considered: <ul style="list-style-type: none"> • Define a limit, or the term 'bulk'. • The impact upon SMRS service levels and potentially liquidated damages. • The potential processing capabilities of different SMRS's. • The impact of more than one supplier undertaking a bulk CoA simultaneously. 		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
Rationale: There should also be a relationship to the MRA to recognise any resulting impacts.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	No
Please state what the issues are: The modification recognises the existing issues, but does not detail any positive resolutions.		
Q4	Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should: a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)	No

	<p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	<p>Yes</p> <p>Yes</p> <p>No</p> <p>No</p>
<p>Rationale: Once the enduring process and volumes are resolved, we believe that the bulk CoA process could apply to more than one agent simultaneously without significantly increasing processing time.</p> <p>We do not believe that the restriction of CoA should require new or additional certification processes.</p>		
Q5	<p>Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)</p>	<p>Yes</p>
<p>Please outline your views: As this process will impact upon Supplier, Agent & SMRS systems, there seems little visibility within the modification of communication between these parties to ensure completeness. We believe that many of the issues surrounding bulk CoA can be resolved if the supplier liaises with these parties in a sufficiently adequate timescales prior to the commencement of such a programme.</p>		
Q6	<p>Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal</p>	
<p>Providing no system changes are required to SMRS, we do not foresee any new or additional costs.</p>		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>Develop a completely new process (as outlined in Section 6.5 of this document)</p>	
<p>Please state your views:</p> <p>a) Ok, subject to agreement between Supplier & SMRS</p> <p>b) Would potential development costs make this a non-starter?</p> <p>c) This option has certain benefits, which is worth pursuing, although the lack of a visible audit trail via on-line forms is one downside.</p> <p>d) No comment, primarily impacts supplier and its hub.</p>		

e) We believe (a) & (c) are our two preferred options to explore at this stage.		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	
Please state your comments		

P63_DEF_007 – Western Power Distribution

Respondent:	Graham Smith
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). Western Power Distribution (South West); Western Power Distribution (South Wales);
Role of Respondent	Meter Operator Agent Distribution Business SMRA

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
Rationale: The market generally will benefit from having clear processes to follow in instances of unplanned bulk transfer, for example agent failure. However for planned changes which, presumably, would primarily be of benefit to a single supplier invoking the process, a series of bilateral agreements between affected parties may be more suitable than a defined standard national process. This would give parties greater freedom in the actions they choose to take and would not block new innovative procedures.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes – for agent failure only.
Rationale: The BSC should contain an obligation in relation to unplanned bulk change of agent. The BSC should not preclude a bulk change of agent for other reasons provided there are adequate safeguards, but it does not necessarily need to be too prescriptive in how it is done.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes.
Please state what the issues are: The incentive on an agent being “bulk de-appointed”, to comply with any new provisions, needs to be considered. Potentially an agent could be de-appointed for the majority of metering systems in its		

portfolio. With the existing processes taking a number of weeks, the agent would be able to downsize resources in line with the reduction in business. In the case of bulk de-appointment there is potentially a need for increased resources in the very short term to deal with queries arising out of the bulk transfer of data and it would be difficult for an agent to justify this when his business is disappearing.

There is potentially a need to change the requirements for PARMs reporting where reports are based on the processing of existing flows.

<p>Q4</p>	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry</p>	<p>a- Yes</p> <p>b -Yes</p> <p>c – No. The volume of half hourly systems, and the higher energy volumes, do not justify a bulk process for half hourly.</p> <p>d – Yes there should be a straight one for one replacement. However, as a result of business mergers some agents could operate under more than one MPID or role code. In the event of financial failure of a company more than one party agent may be affected at the same time. There may be a need for two or more “bulk transfers” to occur concurrently</p>
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	Processes	e- Not as a matter of course, only if the solution is sufficiently complex to warrant it.
Rationale:		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
Please outline your views:		
We think that brand new processes should be developed, probably 3 different processes, one for each type of NHH Agent. However, further detailed analysis of the different options will be needed. The only mechanism we would rule out is a synchronised update of databases.		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
A definite proposal will be required before a full cost assessment can be carried out but we estimate a development cost to us in the region of tens of thousands, possibly in to six figures. Any Agent development costs should be fully recoverable from Suppliers. A Supplier invoking the process should be liable for paying extra costs incurred by other parties who have to implement it.		
Q7	To what extent do you think that it is appropriate to a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)? b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document) c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document) d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document) e) Develop a completely new process (as outlined in Section 6.5 of this document)	If volume constraints are not necessary they should be removed, irrespective of the outcome of this modification proposal. We do not support the idea of a synchronised database update but all the other options should be investigated in an effort to identify the vest solution.
Please state your views:		
Q8	Do you have any further comments on Modification Proposal P63 that	No

	you wish to make?	
Please state your comments		

P63_DEF_008 – SP Energy Retail Ltd

Respondent:	James Nixon
Responding on Behalf of	SP Energy Retail Ltd. SP Generation Ltd. SP Manweb Plc. SP Energy Trading Ltd. SP Transmission Ltd. (Parties) Dataserve UK (Party Agents)
Role of Respondent	(Supplier/Generator/Data Collector/Data Aggregator/ Meter Operator Agent/Distribution Business/Other) All of the above

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	No
Rationale: The existing process should continue as the sole method; we cannot envisage a new process that would prove any more efficient than the existing one and the main problems with using the existing one for large volumes seem to be date related.		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	No
Rationale: Neither the BSC nor the relevant Code Subsidiary Documents should be changed - if we stick to the existing process then there is no mod.		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	No
Please state what the issues are:		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business</p>	<p>a) Yes</p> <p>b) Yes</p> <p>c) No</p> <p>d) Yes</p>

	<p>area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	e) Yes
<p>Rationale: a) During normal commercial operations this would serve to further complicate matters, but, may prove necessary where the Supplier of Last Resort principles were invoked. b & c) agree with suggestions in 5.4 of the document d) it would be more efficient e) If we're to go to the cost of bolstering systems, I think it prudent to ensure that all agents and service providers have achieved similar operational standards.</p>		
Q5	<p>Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)</p>	Yes
<p>Please outline your views: The Supplier of Last Resort Working Group looked at the issue of Agent of Last Resort, but did not reach any conclusions. However, we would suggest that this is an avenue worthy of further exploration before any decisions are reached.</p>		
Q6	<p>Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal</p>	Yes
<p>We suggest a sharing amongst parties of any systems implementation costs, with suppliers paying an amount proportionate to their market share. Furthermore, in each instance of a bulk change, a one-off charge could to be levied, against the party instigating the change, to cover administrative costs. This may prove particularly equitable were an SMRA or outgoing agent is obliged to take-on additional staff to meet an extraordinary requirement and could serve to place the whole issue on a more commercial footing.</p>		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	<p>a) Yes</p> <p>b) No</p> <p>c) No</p> <p>d) No</p> <p>e) No</p>
<p>Please state your views: a) We agree that the existing process should continue for all changes, but think we are still some way from being able to remove those volume constraints, currently being agreed between parties / agents, and would suggest that the Supplier of Last Resort Working Group be invited to look at the issue of CoA once more, with the emphasis placed on data quality. b) The existing process is sufficiently robust c) There are far too many variables between parties / agents to consider synchronised updates. d) As with synchronised updates, there are too many variables. Also, exception identification and handling may be made more difficult, e) Not required.</p>		
Q8	<p>Do you have any further comments on Modification Proposal P63 that</p>	Yes

	you wish to make?	
<p>Please state your comments</p> <p>The current industry processes were designed to be robust and, when operated correctly, will allow an efficient vehicle for change of agent. Therefore, there is no requirement for any change to this current, robust, process.</p> <p>Furthermore, the proposed changes would make audit of all transactions and tracking of data overly complex and could lead to a degradation in the data quality, which would be unacceptable and could possibly have an impact on settlements.</p>		

P63_DEF_009 – Scottish & Southern Energy

This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd.

Whilst we might support this modification in principle, and could see some advantage being gained from it in the circumstances of an Agent failure, we could only support such a modification if it led to a robust and inexpensive mechanism being put in place. Whilst we agree that there is a need for improvement to the existing processes, and that there are many issues that require resolution, we do not believe that the solutions being proposed will eliminate these, nor bring the necessary improvements at a low cost.

Having one "super" flow/process to effect a bulk change of agent will still require a transfer of all of the data needed to allow the new agent to carry out their obligations. It is this transfer of data that is causing the majority of the problems in the market so by allowing bulk changes we will still experience the current problems, but on a larger scale.

Whilst changes to the code may be relatively simple, the actual changes required by the industry would be extremely costly against a low commercial return. There will be a significant cost to provide the functionality for 'bulk' CoA transfer while, at the same time, we will have to continue to operate the existing CoA functionality. There has already been considerable investment in designing and building Agent systems that work extremely well. We believe that we should remain with the proven systems with proven functionality that we have just now.

Our experience of migration of NHHDA and DC has shown that current systems and processes are robust and capable of successfully transferring 5000 DC and DA (combined) per day, with capacity for another 2 or 3 thousand transfers/day. Consideration of the volume limits, rather than their removal as suggested in option 6.1 may be worthwhile, as a solution that is inexpensive and low in risk. Should any option be given further consideration, we strongly believe that the Bulk Transfer process should only apply to Non Half Hourly Metering systems.

If suppliers wish to enact a mass change of agent then it should be arranged between the outgoing/incoming agents, SMRS providers and themselves through commercial agreements. Obligations should not be imposed on the industry as a whole to comply. We do not believe

that this modification should be progressed until solutions to the current change of Agent problems are found. This then may present Suppliers with the ability to change agents in a more acceptable and timely manner.

Regards
Robert Hackland

P63_DEF_010 – British Gas Trading Ltd

Thank you for the opportunity to respond to this first consultation document on Modification Proposal P63. This response is on behalf of British Gas Trading Ltd, Accord Energy, Centrica King's Lynn and Centrica Peterborough.

As the proposer of this modification we are keen to ensure that all options are fully explored to give the industry a solid platform to enable swift and effective bulk transfer of agents following competition in these areas. We believe that this consultation document and the expert group that previously met have identified some workable solutions for addressing this issue. Furthermore, we would like to respond directly to some of the areas identified in the consultation as well as the supplementary questions asked within the consultation.

We believe that P63 would better facilitate the applicable BSC Objectives as stated in our modification proposal and would like to re-iterate that we believe it will;

(i) promote effective competition in the generation and supply of electricity, and (so far as consistent therewith) promote such competition in the sale and purchase of electricity and, (ii) promote efficiency in the implementation and administration of the balancing and settlement arrangements.

In addition the implementation of P63 will address shortcomings within the BSC.

5.1 Existing Change of Agent Process

Whilst we recognise that there will be a need to change the relevant BSCP's and Party Service Lines to ensure the process of Bulk Migration progresses it is important not overlook the BSC role in achieving this objective. P63 is reliant on the BSC being changed to address both single transfers as well as bulk migration, which is currently absent from the documentation.

5.3 Definition of Bulk Transfer

The current process for the single transfer of party agents is constrained by the capacity of the systems, in respect of the volume of data flows from various sources. This is further hampered by the cumbersome current arrangements, which are not conducive to bulk changes taking place by industry participants. Consideration needs to be given to allow this bulk transfer and whether an appropriate threshold for bulk migration need be set.

5.4 Scope of Bulk Change of Agent

The purpose for raising this modification was to enable the industry to consider the options available to facilitate the smooth transfer of bulk sites. We believe that should P63 be approved that flexibility should be built in to the process to enable both Suppliers and Agents the space to undertake the most efficient and effective option for dealing with Bulk Transfers.

When we initially raised P63 it had not been identified by us that it could also resolve the area of SOLR, Failing Agent, Trade Sale or where an Agent is expelled via De-Accreditation. British Gas welcomes the fact that this has also been included within the consultation, as this would provide the industry with a robust, complete and enduring market solution.

5.5 Limitations of Existing Change of Agent Process

We believe that further work is required in the area for determining any capacity constraints. Initially it was only thought to relate to SMRA but now may include constraints on Agents, Suppliers and the Central Database. Therefore it would be advisable for an Impact assessment to be carried out by all affected parties to assess their capacity constraints.

5.6 Other Issues for considerations

Industry data, in particular technical history is a major part of the transfer requirement for bulk migration. To ensure that the majority of the bulk migration takes place efficiently it would be beneficial to have 'filter systems' which allows the majority of migration to take place but also filters out poor data flows and then ensures that there is a robust process to deal with exceptions.

We note that customer appointed agents need to ensure that MPAN lists are available to help the bulk migration of information.

The requirement to develop a new entry process does not appear to be relevant in this context. We feel that the process could be easily and simply managed and not unduly burden some.

The relevance of any costs for system enhancements could be identified at the impact assessment stage.

6.1 Using the Existing Process but removing volume constraints

Further investigation is required in respect of the capacity limits and most suitable time period for the bulk transfer through the DTN. Any costs for this are likely to be recovered by the Supplier, through the contractual agreements between the Supplier and the Party Agent. Further consideration of who bears any additional costs in the event of a SOLR or a failed Agent may also be required otherwise this may be borne by the BSCCo.

6.2 Varying the existing processes We believe that varying the existing process including the use of super flows or combining some of the flows could take place. However, there would need to be further help and support from MRASCo and also some of the work that the REMA group have also explored (Not sure of your point here).

6.3 Synchronising Databases updates

Though not clearly identified in the consultation there may be the opportunity to consider the use of a CD-Rom in developing Bulk Migration. This could be a cheaper option available, as most companies already utilise CD-Roms to update certain systems and there is also provision in the DTN contracts to facility this option. The synchronising of the databases would also assist in the smooth transfer of bulk migrations via CD-Rom.

6.4 Alternative data sourcing

It is British Gas' belief that if we were to look at an alternative source of data that all information should be held centrally. One system that could be used as a data warehouse holding all MPAN details and Meter details would further promote competition. If one central source of data is held including Distributor information and MPAN numbers would enable true data alignment across the industry. A totally new company could carry out this function or it may be an existing company such as BSCCo or MRASCo.

Should you like to clarify any of the above points please feel free to give me a call.

Yours Faithfully
Andrew Latham

Respondent:	Andrew Latham
Responding on Behalf of	Please list all Parties responding on behalf of (including the respondent company if relevant). British Gas Trading Limited
Role of Respondent	(Supplier/Generator/Data Collector/Data Aggregator/ Meter Operator Agent/Distribution Business/Other) Supplier

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
<p>Rationale: The need for smooth Bulk Transfer of Party Agents needs to be placed in The BSC and also supplemented by the BSCP's. It is a key requisite that if the electricity market wishes to attract more Party Agents and greater competition this process is needed as soon as possible. It will generate more competition and improve levels of service within Suppliers and Agents.</p>		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	Yes
<p>Rationale: As stated in our proposal we believe that P63 would better facilitate the applicable BSC Objectives as started in our proposal but would like to re-iterate that it will: (c) Promote effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition the sale and purchase of electricity; (d) Promote efficiency in the implementation and administration of the balancing and settlement arrangements. P63 will address shortcomings in the BSC</p>		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
<p>Please state what the issues are: British Gas believe that most areas were covered and further explanation can be found in our letter</p>		

attached

Q4	Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should: a) Exclude, but are resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier) b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation) c) Cover both Half Hourly and Non Half Hourly Metering Systems d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area? e) Should introduce new Accreditation / Certification /Entry Processes	No Yes Yes No No
Rationale: Most are covered in our covering letter however under; A) although this could be difficult at this early stage nothing should be discounted until further analysis is carried out. B) there would be the need to have multiple Settlement days. C) The requirement is needed in both HH and NHH although we believe the greater use would be in NHH D) There may be multiple Party Agents within a GSP group or Distribution Business Area therefore this would require more analysis. E) There should be no need to introduce this, as Accreditation/ Certification is a different issue.		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
Please outline your views: These views are identified in our Letter including CD Rom, DTN gateway etc		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
It is imperative that this mod goes through a full impact assessment to ensure all costs are clearly visible.		
Q7	To what extent do you think that it is appropriate to a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)? b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)	Possible Possible

	<p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	<p>Yes</p> <p>Possible</p> <p>Possible</p>
<p>Please state your views:</p> <p>Most of these have been highlighted in our accompanying letter however most are possible and none should be disregarded. However the CD Rom option in C is already used within the industry and may be an easier and cheaper solution than others. Again at this early stage there are strengths and weaknesses to all of the above.</p>		
Q8	<p>Do you have any further comments on Modification Proposal P63 that you wish to make?</p>	<p>Yes</p>
<p>Please state your comments</p> <p>British Gas believes that modification P63 should go to the Assessment process.</p>		

P63_DEF_011 – Innogy plc

Respondent:	Richard Harrison, Npower Limited
Responding on Behalf of	Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited
Role of Respondent	(Supplier/Generator/Data Collector/Data Aggregator/ Meter Operator Agent)

	Question	Response Yes/No
Q1	<p>Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?</p>	<p>Yes</p>
<p>Rationale:</p> <p>To ensure a workable process to deal with Agent failure etc and support the principle that the Supplier has the right to determine his Agents (in line with Supplier Hub responsibility)</p>		
Q2	<p>Do you agree that such an obligation should be placed within the Balancing and Settlement Code?</p>	<p>Yes</p>
<p>Rationale:</p> <p>The process needs to be defined under the Code, to protect the integrity of Imbalance Settlement. The issue is that the process needs to have minimum dependence on actions by the 'Old Agents', while</p>		

being supported 'New Agents' and SMRAs.

Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
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Please state what the issues are:

The existing processes for Change of Agent assume that NHHDA's, HHDAs and HHDCs will continue to perform for earlier Settlement Days even when they have been de-appointed. While this facilitates continuity short-term, it may not be commercially realistic in the longer term (particularly in the case of Agent failure or removal of Accreditation) and we do not believe it should preclude a Supplier from transferring the relevant data and processes for historic periods to a new Agent, if desired.

Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>No</p> <p>Yes</p>
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Rationale:

a) The risks are significantly reduced by avoiding Change of Agent coincident with Change of Supplier, both because it places the whole COA process under a single Supplier's responsibility/control and because it ensures that the Supplier has a complete view of the existing Agent appointment position. However, if a workable 'bulk' process for COA can be developed, it may be worth considering whether it could be combined with Change of Supplier under some circumstances.

b) A completely different process is applicable for non-SVA Metering Systems, of which there are a much smaller number in any case.

c) The same simplifications in relation to Agent appointments and SMRSs ought to be equally applicable in both cases.

d) It is assumed that a number of such changes could be sent to complete the desired effect, and also that each request would include a list of MPANs (which would facilitate consistency checking and some control of volumes for testing/proving purposes). Sending the flows separately to change one Agent at a time is superficially simplest but could lead to a much more complicated process than specifying all Agent changes in one flow.

e) We assume that this would be a 'Re-Certification' process with some form of testing/controlled volume proving.

Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	Yes
<p>Please outline your views:</p> <p>I agree with a lot of the points in Section 6. Note that some of the options are not exclusive – e.g. different formats for data transfer and database updates. See also response to Q8.</p>		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	Yes
<p>Hopefully, the impact of this on Elexon's systems will be minimal, and if most of the impact is on the 'New Agents' and Supplier's systems it will be for them to sort out commercially. OFGEM will need to clarify whether SMRA costs can be recovered through DUOS charges.</p>		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	
<p>Please state your views:</p> <p>(b) and (c) look like the basis of potential solutions. Alternative data sourcing deserves serious consideration, particularly where this can be lifted from D flows or other Certified systems (or SVAA?). Given that there are (believe it or not) logical reasons for most of the current process design, it would seem more appropriate to start from this and look at how it might be simplified rather than completely from scratch.</p>		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	Not at present
<p>Please state your comments</p>		

P63_DEF_012 – Association of Meter Operators

Respondent:	Keith Sullivan
Responding on Behalf of	Association of Meter Operators
Role of	Meter Operators CVA, SVA HH and NHH

Respondent	
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	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	Yes
<p>Rationale: The possibility of agent failure has increased with possible diversification of agent ownership. For example, a Supplier failure could now include an agent owned by that Supplier. The needs of Suppliers like BGT are also recognised.</p>		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	No view
<p>Rationale: Whether this should be in the Code or Code Subsidiary documents is not material to MOAs. Any obligation on the agents should be limited volumetrically to the level of their business at the time of the transfer.</p>		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Not known
<p>Please state what the issues are: There has not yet been sufficient discussion to ensure that all the issues have been identified.</p>		
Q4	<p>Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should:</p> <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry Processes</p>	
<p>Rationale:</p> <p>a) if a Supplier owned an agent this would be essential. Therefore concerned about this restriction.</p>		

<p>b) Yes</p> <p>c) May be possible to deal with HH systems with existing processes.</p> <p>d) Yes</p> <p>e) No. If you want agents to do this do not impose expensive incumbrances for something that may never happen. Change management should be adequate.</p>		
Q5	Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)	No
Please outline your views: Further discussion needed		
Q6	Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal	No
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p>	
Please state your views: No view at present		
Q8	Do you have any further comments on Modification Proposal P63 that you wish to make?	No
Please state your comments		

P63_DEF_013 – GPU Power (UK)

Respondent:	Rob Smith/Craig Finn/Joanne Coveney
Responding on Behalf of	GPU Power (UK)
Role of Respondent	Data Collector/Data Aggregator/ Meter Operator Agent/Distribution Business/Service Provider

	Question	Response Yes/No
Q1	Do you agree with the principle that a process needs to be created to deal with a Bulk Transfer Process for Party Agents?	No
Rationale: <p>In our view, the case has yet to be proven that there is a requirement for either an additional or alternative process to the one currently operated. The current CoA process is not as efficient or effective as it could be, due to a combination of defects in the design and poor practise by some market participants. However, introducing a separate/new process without first improving the operability of the current process and fully understanding its performance limitations does not seem to be a wise course of action. Furthermore, we are not convinced that there is a requirement to alter the Code to effect any changes that would be deemed necessary to address those performance limitations, once identified.</p>		
Q2	Do you agree that such an obligation should be placed within the Balancing and Settlement Code?	No
Rationale: <p>Please see previous response. Any necessary changes could, in all probability be developed under the current scope of the Code. There does not seem to be any reason to introduce further/specific obligations for this purpose.</p>		
Q3	Does the Modification Proposal raise any issues that you believe have not been identified so far and that should be progressed as part of any Assessment Procedure for this Modification?	Yes
Please state what the issues are: <ol style="list-style-type: none"> Potential Re-certification, where there are significant process changes, or new processes including both changes to IT systems and to working methods/practices MRA Re-qualification on the part of Service Providers and/or Suppliers where any change impacts these parties 'materially'. 		
Q4	Sections five and six of this Consultation Document described some of the issues associated with implementing a Bulk Transfer process. Do you agree that any Bulk Transfer process should: <p>a) Exclude, but be resilient to, coincident Changes of Supplier? (i.e. not undertake a transfer of Party Agents for metering systems where the Supplier is losing a site to another Supplier)</p> <p>b) Be restricted to SVA metering systems? (as outlined in Section 5.5 of this consultation)</p> <p>c) Cover both Half Hourly and Non Half Hourly Metering Systems</p> <p>d) Should only be used for the replacement of a single Party Agent with another single Party Agent within a Distribution Business area?</p> <p>e) Should introduce new Accreditation / Certification /Entry</p>	<p>Yes</p> <p>Yes</p> <p>No</p> <p>Yes</p>

	Processes	No
<p>Rationale:</p> <p>a) Introducing the CoS process may potentially complicate the bulk CoA transfer method further.</p> <p>b) Bulk can really only be considered in terms of SVA as there are not sufficient volumes to justify such a method in CVA.</p> <p>c) Logically, a process that works for NHH would also work for HH. However, the volumes are different for HH, (being considerably less) and agent appointments are <i>customer</i> rather than Supplier driven.</p> <p>d) The process needs to be as simple as possible, introducing further variables may well impede the operation and success of any transfer.</p> <p>e) Wholesale changes would make this inevitable to provide assurance of its integrity, but it is undesirable because of the time/effort and cost. We would not wish any of our Agency Services to be subject to this process, as we see no material benefit to our business.</p>		
Q5	<p>Do you have any views on the most appropriate mechanisms for introducing a Bulk Transfer process? (Note that the mechanisms already considered are detailed in Section 6 of this consultation document)</p>	Yes
<p>Please outline your views:</p> <p>i) Utilising Existing Process but removing volume constraints – Although there are no formal volume constraints in place, the industry operates with a ‘gentleman’s agreement’. To submit overly excessive volumes of CoA instructions would only cause the industry’s IT systems to seize up and MPAS Service Providers to fail MRA imposed Service Levels and suffer liquidated damages. Incidentally, P63 sites MPAS systems as ‘the main constraint’. In fact, this is not the case. Were 20,000 CoA appointments to take place on one day, there would be no reason to submit those CoA appointments to an MPAS system on one day. The notifications could, in fact, be ‘drip fed’ over a number of days. It is far more likely that the exchange of meter readings and meter technical details between other parties would prove to be the ‘bottle neck’.</p> <p>ii) Varying the existing process in some way by streamlining some of the elements of the process – This would seem to be an eminently sensible approach. The Industry has demonstrated, through the ICT consultation, that it has much more appetite for refinement as opposed to re-engineering. Perhaps MRASCo could be used as a vehicle to achieve this.</p> <p>iii) Synchronising database update – Despite our response to question 4 (above) we would point out that the industry as a whole has already considered the introduction of ‘synchronised database update’ to effect bulk transfers (when consulting on a SoLR solution). Most MPAS Service Providers supported the introduction of this change, but the Industry overwhelmingly rejected it. Our support would be less forthcoming now, given that such a change would introduce cost to us, for no material benefit.</p> <p>iv) Developing a New Process – Please see ii) (above) and our response to question 1.</p>		

Q6	<p>Do you have any views on the costs and cost allocation for any implementation of this Modification Proposal</p>	Yes
<p>NHHMO/NHHDC/NHHDA/MPAS/PDSO We're unable to quantify at such an early stage, the cost of implementing any change to address 'Bulk Transfer', particularly when we do not know which solution (if any) will ultimately be used.</p> <p>NHHMO/NHHDC/NHHDA As specified above, even utilising the existing process would involve a cost to us, since we would wish to undertake analysis and testing of each of our systems to ensure they were able to cope with the potential increase in flow volume of anything up to 2 million flows as well as all the other flows we receive on a daily basis. A conservative estimate of this work alone rolls out at approximately £60,000. This includes initial performance analysis of each of the systems and servers, testing of the systems/servers and the re-accreditation costs for each of these systems. Any actual changes that had to be made to the systems would be additional to this and our 3 systems that we use for NHHMO, NHHDC and NHHDA are 3rd party developed. The cost would be equally amongst our 3 different business areas and these costs would probably have to be reflected in our contract prices with Suppliers. We are concerned about the continued level of ongoing development costs and the 'loading' effect these have on agent overheads. We believe that this must ultimately be a restrictive element to competition and reduce the potential for lower customer prices.</p> <p>Furthermore, and given that this involves the least amount of change this is a substantial amount of money to pay for something that may not be required of all agents on a regular basis.</p> <p>PDSO/MPAS The introduction of synchronised database changes would be likely to cost us upwards of £20k. We would not support the introduction of any change, which introduces a cost to us for no material benefit.</p>		
Q7	<p>To what extent do you think that it is appropriate to</p> <p>a) Use the existing process but remove any volume constraints (As outlined in Section 6.1 of this document)?</p> <p>NHHMO/NHHDC/NHHDA Although this would require no actual change to our systems we would need to do some analysis on performance. We also feel that it would have to be agreed up-front (and probably put into our contracts with Suppliers) as to what subsidised costs the Suppliers would pay for if the existing process was used (particularly for example, if they wanted to send say 2 million flows in one day). Furthermore, volume constraints appear to be self-imposed rather than documented limits and in any case these will logically be system and process constraints and remain unaffected by any such edict.</p> <p>PDSO/MPAS The submission of overly excessive volumes of CoA instructions would only cause the industry's IT systems to seize up and MPAS Service Providers to fail MRA imposed Service Levels and suffer liquidated damages. Incidentally, P63 sites MPAS systems as 'the main constraint'. In fact, this is not the case. Were 20,000 CoA appointments to take place on one day, there would be no reason to submit those CoA appointments to an MPAS system on one day. The notifications could, in fact, be 'drip fed' over a number of days. It is far more likely that the exchange of meter readings and meter technical details between other parties would prove to be the 'bottle neck'.</p>	

	<p>b) Develop a revision to the existing processes (as outlined in Section 6.2 of this document)</p> <p>Developing a revision to the existing processes would seem to be the most sensible approach. However, we would suggest that any investigative work should not be limited to focussing on the three options suggested in 6.2, but should examine the process more broadly to identify defects and bad practise by Market Participants. Perhaps MRASCo could be used as a vehicle to achieve this. We would also point out the flaws in the concept of a 'super flow' as:</p> <p>i) We're not aware of any DTN restrictions that would warrant the need for such a flow;</p> <p>ii) Irrespective of whether bulk CoAs could be compressed into one 'super flow', those individual appointments would still need to be processed. This is where IT systems would likely fail.</p> <p>c) Develop a solution based on synchronised database updates (as outlined in Section 6.3 of this document)</p> <p>This process could work, but again is not on its own an ideal solution, we would recommend that further analysis work is undertaken before considering its viability. More specifically, we do not feel this would be appropriate to use for the whole bulk change of agent process as it is unclear how it would cover all the aspects of data transfer between agents necessary to make the overall process work. Again, we would point out that the industry as a whole has already considered the introduction of 'synchronised database updates' to effect bulk transfers (when consulting on a SoLR solution). Most MPAS Service Providers supported the introduction of this change, but the Industry overwhelmingly rejected it. Our support would be less forthcoming now, given that such a change would introduce cost to us, for no material benefit.</p> <p>d) Look at mechanisms for Alternative Data Sourcing (as outlined in Section 6.4 of the this document)</p> <p>We do not feel this would be an appropriate mechanism to use generally, but might be workable in specific situations. However, any use of in such situations would need to be measured against the risk to Settlement.</p> <p>e) Develop a completely new process (as outlined in Section 6.5 of this document)</p> <p>Potentially this might be appropriate to use if you were looking for a solution that did not have to be implemented in the short-term. However, the development of a completely new process has re-engineering connotations and with it significant costs they may not be in any sense recoverable. We do not favour such an approach for this reason.</p>	
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