

ANNEX 7 – RESPONSES TO CONSULTATION AND IMPACT ASSESSMENT

The responses to the consultation and impact assessment carried out by the Modification Group are shown below. Summaries of the responses to the consultation and impact assessment carried out by the Modification Group are shown in Attachments 1 and 2.

Responses from P43 Assessment Consultation

Consultation issued 6 November 2001

Representations were received from the following parties:

No	Company	File Number	No. Parties Represented
	Utility Link Ltd	P43_ASS_001	1
	London Electricity Group	P43_ASS_002	1
	TXU Europe	P43_ASS_003	12
	Yorkshire Electricity Distribution	P43_ASS_004	1
	SEEBOARD	P43_ASS_005	2
	MRASCo	P43_ASS_006	N/A
	Scottish & Southern Energy plc	P43_ASS_007	4
	Npower Limited	P43_ASS_008	8
	Scottish Power Energy Retail Ltd	P43_ASS_009	1
	British Energy	P43_ASS_010	3
	Powergen UK plc	P43_ASS_011	4
	Scottish Power	P43_ASS_012	2

P43_ASS_001 – Utility Link Ltd

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Chris Welby

Organisation: Utility Link

Response provided on behalf of:

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	Not Sure
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	NHHDC would be the best party if it is agreed PDSO's require the data
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	NO
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	Suspect that some PDSO's would prefer to continue to receive D0010's, but believe it should be an either or situation to PDSO's not D0019s to some, D0010s to others.

Question	Response
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	Not sure
Q6 Which Parties would benefit from the Modification Proposal.	Some PDSOs
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	By those requiring the change. Including operational costs as PDSOs do not presently pay for the NHHDC

B Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	Would be more costly. The original proposal means adding the PDSO to the circulation of D0019s. This option would require development work.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	No
Q3 If a regular 'snapshot' of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	Annually
Q4 If a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA.	NHHDC
Q5 If a regular 'snapshot' of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	YES
Q6 Would the provision of a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	Not Sure

Question	Response
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Some PDSOs
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	As above

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	Decision for PDSOs
Q2 Which Parties would benefit from the Alternative Proposal.	Not Sure
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	As above

D Any other issues that should be considered by the VA Modification Group

Issues	Comment
Another alternative is for PDSOs to use a copy of the EAC/AA calculator to process the D0010 data they already receive to produce the data they require. This means those who prefer the D0010 data can still receive it, and those wanting EAC/AA data can create it.	

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_002 – London Electricity Group

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: HARISH MISTRY

Organisation: LONDON ELECTRICITY GROUP

Response provided on behalf of: LONDON POWER NETWORKS PLC (LPN)

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	This will allow PDSO's better monitoring of quality of information in the settlement process and detect possible bias in the data. It can be used as a tool for forecasting sales and Income and movements between reconciliation runs
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	YES
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	IT SHOULD ONLY BE SENT VIA NHHDC
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer	D10 should be continued , this can be reviewed at a later date

Question	Response
receive meter reading data via the D010 flow.	
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	May do but LPN are not seeking data for this purpose
Q6 Which Parties would benefit from the Modification Proposal.	Predominately PDSO's but may be spin-off benefit for other parties
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Via central cost sharing

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	It will be more cost effective to receive a snapshot
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA's to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	Yes on a monthly basis
Q3 If a regular 'snapshot' of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	Monthly
Q4 If a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA's.	Via NHHDC
Q5 If a regular 'snapshot' of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	D10 should be continued , this can be reviewed at a later date
Q6 Would the provision of a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering	May do but LPN are not seeking data for this purpose

Question	Response
equipment.	
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Predominately PDSO's but may be spin-off benefit for other parties
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Via central cost sharing

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	NO
Q2 Which Parties would benefit from the Alternative Proposal.	-
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	-

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / ~~will not~~ impact on our systems and processes.

We would require _30_ days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / ~~will not~~ impact on our systems and processes.

We would require _30__days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_003 – TXU Europe

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Philip Russell

Organisation: TXU Europe BSC Parties (12)

Response provided on behalf of: as above

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	Tenuously is the best that can said for it.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	We would only say “yes” to this if a significant majority of PDSOs said they wanted it and they were prepared to pay for it.
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	As there are fewer NHHDCs than Suppliers it seems a more complicated way of achieving the desired end.
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	We suspect that they would still have to be supplied as the PDSO may produce individual invoices for some NHH MPANs. It would be possible to reduce the number of MPANs for which a D010 is sent to the PDSO but this would require a link as to whether the MPAN was subject to Supercustomer DUoS billing.

Question	Response
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	If it does it is not obvious.
Q6 Which Parties would benefit from the Modification Proposal.	Presumably PDSOs.
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	If it was appropriate it would be the PDSOs. Under the terms of the BSC it would be (physical) Trading Parties.

B Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	If it was monthly it would still require software / process changes for Suppliers. If it was Quarterly or Annually we doubt it would have much value to the PDSOs. Consequently we do not believe the alternative would better achieve the relevant objectives.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	No
Q3 If a regular ‘snapshot’ of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	Not applicable given our answer to Q2
Q4 If a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA.	Not applicable given our answer to Q2
Q5 If a regular ‘snapshot’ of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	As above AQ4
Q6 Would the provision of a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering	As above AQ5

Question	Response
equipment.	
Q7 Which Parties would benefit from the Alternative Modification Proposal.	As above AQ6
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	As above AQ7

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	It would quicker, easier and probably cheaper. It would also be more accurate than profiling the EAC/AA data given such vagaries as TPR rounding of Teleswitching regimes, allocation of Line Losses and GSP Group Correction Factors.
Q2 Which Parties would benefit from the Alternative Proposal.	PDSOs
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	There would not be any central costs.

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will not impact on our systems and processes.

We would require ___ days notice to implement the necessary changes.

Comments: The above is on the assumption that if the Proposal were to be implemented it would be done via the NHHDC system. This effects the Agents systems and processes rather than the Supplier.

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will not impact on our systems and processes.

We would require ___ days notice to implement the necessary changes.

Comments: It effects the Agents systems and processes rather than the Supplier.

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will not impact on our systems and processes.

We would require no notice to implement the necessary changes.

Comments: It is outside the BSC and within the control of the PDSO.

Name: _____

Organisation: _____

Date: _____

P43_ASS_004 – Yorkshire Electricity Distribution

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Janet Garlick

Organisation: Yorkshire Electricity Distribution

Response provided on behalf of:

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	Proposed Mod enables PDSOs to validate/audit data entering settlements
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	Yes
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	By NHHDC
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	No
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	Don't think so

Question	Response
Q6 Which Parties would benefit from the Modification Proposal.	Distributors
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	From Trading Parties

B Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	Similar to P0043 if monthly
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	Yes
Q3 If a regular 'snapshot' of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	monthly
Q4 If a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA.	NHHDA
Q5 If a regular 'snapshot' of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	No
Q6 Would the provision of a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	Not sure
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Distributors, NHHDC

Question	Response
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Trading Parties

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	No
Q2 Which Parties would benefit from the Alternative Proposal.	Only imagine this has any benefits if more specific localised losses required; or if this is the only information available for system design/ planning
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Through DUoS (Additional allowances would be required in DPCR)

D Any other issues that should be considered by the VA Modification Group

Issues	Comment
YE currently has no systems in place to store and manage information of this size. Such a System would need to be sized to store circa EACs for 2 million customers. This would incur costs which it would be difficult to see how they would be recovered.	

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_005 – SEEBOARD

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Dave Morton

Organisation: SEEBOARD

Response provided on behalf of: SEEBOARD Energy Limited & SEEBOARD Power Networks plc

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	We are unsure as to how this option would better facilitate the BSC objectives.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	We feel that Elexon are best placed to determine as if this does not benefit the settlements process, such changes could be considered outside of scope.
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	It is likely that data would be better managed if sent by a NHHDC or NHHDA. Rules for populating a D0019 would be different from those sent to DA's & Suppliers. Careful definition will be required as this could be a difficult change to implement.
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	We feel this flow instance should remain.

Question	Response
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	No
Q6 Which Parties would benefit from the Modification Proposal.	PDSOs.
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	We feel the issue on costs are likely to be higher contentious. We feel this will require further definition, but believe a fair means needs to be found.

B Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	We believe this option to be the most appropriate. A lower frequency would benefit all parties by lowering the number of times this data is required.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA s to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	As per option A.
Q3 If a regular ‘snapshot’ of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	Possibly on a quarterly basis, however, we would need further details to fully determine.
Q4 If a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA s.	In this case should be sent by NHHDA s. Functionality would be similar to a D0095 and individual timetables for parties could be adopted.
Q5 If a regular ‘snapshot’ of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	We believe this flow instance should remain.
Q6 Would the provision of a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	No comment.

Question	Response
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Mainly PDSOs, however, this would also benefit agents as it requires less work.
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	As per Option A.

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	We do not feel this alternate is a sensible way forward. This data is already available as noted against Options A & B.
Q2 Which Parties would benefit from the Alternative Proposal.	
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

At this stage we are unable to determine the impact of these changes. A further consultation would be required in order for this to be completed.

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

See comment on Alternate A above.

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

See comments on Alternate A

Name:_____

Organisation:_____

Date:_____

P43_ASS_006 – MRASCo

If either the proposed or alternative solution of 'snapshot' data is agreed, this change will be required to go through the MRASCo/Elexon Joint Impact process, as the means of transferring this information will require consequent change/s to the MRASCo Data Transfer Catalogue.

We would confirm that we have already been contacted by the original proposer regarding the drafting of a DTC CP, so we are aware of the Change required, and this Email is to record that the issue of Joint Impact, and the due process of the DTC CP through the MRASCo Change Process, need to be recognised in the Modification Consultation and Impact Assessment.

Please do not hesitate to contact me if you have any queries.

Regards

Jill Ashby

020 7481 9935

P43_ASS_007 – Scottish & Southern Energy plc

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Garth Graham

Organisation: Scottish & Southern Energy plc

Response provided on behalf of: Southern Electric, Scottish and Southern Energy, Keadby Generation Ltd. and SSE Energy Supply Ltd.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	To no great significant extent.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	No
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	No
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	
Q5 Would the provision of AA and EAC data to PDSOs raise any issues	

Question	Response
concerning change of Metering Class or change of NHHDC.	
Q6 Which Parties would benefit from the Modification Proposal.	Those PDSOs who have not installed their own metering systems at Feeder level in their own networks.
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	From those PDSOs who have not installed their own metering systems at Feeder level in their own networks that wish to receive this information.

B Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	To no great significant extent.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA s to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	No
Q3 If a regular ‘snapshot’ of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	
Q4 If a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA s.	NHHDA s
Q5 If a regular ‘snapshot’ of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	
Q6 Would the provision of a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	

Question	Response
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Those PDSOs who have not installed their own metering systems at Feeder level in their own networks.
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	From those PDSOs who have not installed their own metering systems at Feeder level in their own networks that wish to receive this information.

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	Yes
Q2 Which Parties would benefit from the Alternative Proposal.	Those PDSOs who have not installed their own metering systems at Feeder level in their own networks.
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	From those PDSOs who have not installed their own metering systems at Feeder level in their own networks that wish to receive this information.

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_008 - Npower Limited

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Terry Ballard

Organisation: Npower Limited

Response provided on behalf of: Innogy plc, Npower Limited, Npower Direct Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Northern Limited, Npower Northern Supply Limited, Innogy Cogen Limited

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	This Modification Proposal does not appear to better facilitate any of the defined BSC Objectives. There is a risk that it will actually give misleading information and could therefore lead to charges being incorrectly imposed on embedded generators, which would act as a barrier to competition.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	This does not appear to be necessary
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	No

Question	Response
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	No, the D0010 may contain other necessary information
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	?
Q6 Which Parties would benefit from the Modification Proposal.	The Proposer clearly believes that his Distribution Business will benefit. However it is unclear whether Distribution Businesses in general or any other class of BSC Parties will benefit. By their nature, EACs do not provide an accurate forecast of load at any particular time for any individual Metering System or group of Metering Systems.
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	It would be most appropriate for the costs to be recovered from Distribution Business(es) requiring this service, in order to provide the appropriate cost message to them when considering this against other possible alternatives, and thereby avoid distorting business decisions. Any BSC costs could alternatively be recovered through BSC charges to Suppliers, provided that this was accompanied by an appropriate reduction of Distribution Use of System Charges (This is a matter for the Authority).

B Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	More cost-effective than the Modification Proposal, but it still does not seem to better facilitate any of the defined BSC Objectives.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	No, since this does not seem to be a Code requirement

Question	Response
Q3 If a regular 'snapshot' of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	It is not clear to us that any of these options is actually appropriate, since what is most likely to be of interest is changes in consumption values, which is best identified when actual meter readings are obtained.
Q4 If a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA.	It would seem most sensible for this to come from the DC.
Q5 If a regular 'snapshot' of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	No, the D0010 may contain other necessary information
Q6 Would the provision of a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	?
Q7 Which Parties would benefit from the Alternative Modification Proposal.	See response to Q6 in section A
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	See response to Q7 in section A

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	This option is open to Distribution Businesses now, and we do not believe it requires a Code Modification (even if this issue was within scope of the BSC, which we don't believe it is).
Q2 Which Parties would benefit from the Alternative Proposal.	Potentially, Distribution Businesses, since this could give them more accurate information on the actual loads on their networks.
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	We believe the costs of this should be met by reduction in Distribution Business costs.

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_009 – Scottish Power Energy Retail Ltd

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: James Nixon

Organisation: Scottish Power Energy Retail Ltd

Response provided on behalf of:

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	It does not appear to address any of the BSC objectives.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	No
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	No
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	Yes
Q5 Would the provision of AA and EAC data to PDSOs raise any issues	Not aware of any

Question	Response
concerning change of Metering Class or change of NHHDC.	
Q6 Which Parties would benefit from the Modification Proposal.	Distributors
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Distributors

B Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA to be required to provide PDSOs with a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	It does not appear to address any of the BSC objectives.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	Yes
Q3 If a regular ‘snapshot’ of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	Annually
Q4 If a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA.	NHHDA
Q5 If a regular ‘snapshot’ of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	Yes
Q6 Would the provision of a regular ‘snapshot’ of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	Not aware of any
Q7 Which Parties would benefit from the Alternative Modification Proposal.	Distributors

Question	Response
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Distributors

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	Yes
Q2 Which Parties would benefit from the Alternative Proposal.	All
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	As it is already within Distributors' powers to install such metering, at their own expense, it may not be appropriate to ask other market participants to bear these costs.

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will / impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will / impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal / will not impact on our systems and processes.

We would require ____days notice to implement the necessary changes.

Comments:

Name:_____

Organisation:_____

Date:_____

P43_ASS_010 – British Energy

Modification Proposal P43 - Provision of Annualised Advance and Estimated Annual Consumption

British Energy acknowledges that distribution businesses may have valid reasons for wishing to obtain detailed information about actual and predicted electricity usage of users connected to their system. We support the principle of making EAC/AA data available to distribution businesses, but have concerns that the costs should be carefully weighed against the benefits before deciding whether to proceed with this modification or alternatives which may be identified. We note that the BSC objectives relate primarily to the Transmission Licence and electricity trading activities. We have not investigated how the operational requirements of distribution system operators are covered under the BSC.

Martin Mate

for

British Energy Power & Energy Trading Ltd

British Energy Generation Ltd

Eggborough Power Ltd

P43_ASS_011 – Powergen UK plc

P043 - Provision of AA and EAC data to PDSOs

I am writing in response to the consultation on the above modification proposal. This response is made on behalf of Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited and Cottam Development Centre Limited.

We are happy to support the proposal on the following basis:

Data is provided directly to PDSOs on the basis of existing flows, not through suppliers.

The costs of providing the data and any required systems changes are borne by PDSOs directly.

Our response to the questionnaire and the impact assessment is attached. Please contact me in the first instance on 024 7642 4829 should you wish to discuss any of our response further.

Yours sincerely,

Paul Jones

Strategy and Regulation

Annex 1: Modification P 43

Attachment 1: - Modification Proposal P043 Consultation Questions

Name: Paul Jones

Organisation: Powergen UK plc

Response provided on behalf of: Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, and Cottam Development Centre Limited

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

Question	Response
Q1 To what extent does the Modification Proposal better facilitate the Applicable BSC Objectives.	Strictly speaking it does supply of electricity. If operation of distribution generation and supply m
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs to send AA and EAC data to PDSOs.	Does the BSC need to k could be addressed by a
Q3 If AA and EAC data is to be sent to the PDSO should it be sent by the Supplier rather than the NHHDC, even though this introduces an additional loop that may be superfluous.	No. The most efficient r the NHHDC.
Q4 If AA and EAC data is to be sent to the PDSO should PDSOs no longer receive meter reading data via the D010 flow.	Strictly a PDSO decision the P10 should be halted
Q5 Would the provision of AA and EAC data to PDSOs raise any issues concerning change of Metering Class or change of NHHDC.	PDSOs need to assess in
Q6 Which Parties would benefit from the Modification Proposal.	PSDOs.
Q7 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Directly from the PDSO Agents

B Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

Question	Response
Q1 To what extent does the Alternative Modification for NHHDCs or NHHDA s to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, better facilitate the Applicable BSC Objectives.	This could reduce the v the impact on DC/DA s have to be assessed.
Q2 Should the BSC, Code Subsidiary Documents and other Configurable items be changed to require NHHDCs or NHHDA s to send AA and EAC data to PDSOs on a monthly, quarterly or annual basis.	If adopted, all affected c
Q3 If a regular 'snapshot' of AA and EAC data is to be provided to PDSOs should it be sent monthly, quarterly or annually.	PDSOs need to define adequate.
Q4 If a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, is to be provided to PDSOs should it be sent by NHHDCs or NHHDA s.	Have no preference.

Question	Response
Q5 If a regular 'snapshot' of AA and EAC data is to be sent to PDSOs should PDSOs no longer receive meter reading data via the D010 flow.	PDSOs need to decide.
Q6 Would the provision of a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually, to PDSOs raise any issues concerning change of Metering Class, change of NHHDC, change of NHHDA or change of metering equipment.	Impact assessments from
Q7 Which Parties would benefit from the Alternative Modification Proposal.	PDSOs.
Q8 In the light of the Applicable BSC Objectives, how should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Costs should be recovered

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

Question	Response
Q1 Should PDSOs be asked to install their own metering systems at Feeder level in their own network.	If BSC Parties pick up ; this proposal should be PDSOs, then this decision them.
Q2 Which Parties would benefit from the Alternative Proposal.	PDSOs subject to cost be
Q3 How should any costs (including but not necessarily limited to the cost of changes to central systems) most appropriately be recovered.	Directly from PDSOs.

D Any other issues that should be considered by the VA Modification Group

Issues	Comment

Attachment 2: Modification Proposal P043 High Level Impact Assessment

When responding would you describe the impact on your processes and systems of implementing Modification Proposal P043, the Alternative Modification and the Alternative Proposal, in particular the timescales for implementation of the proposed changes in your organisation, using the forms overleaf.

A Modification Proposal P043 Provision of AA and EAC data to PDSOs

The implementation of Modification Proposal P043 will not impact on our systems and processes.

Comments:

The above response is based on the assumption that suppliers do not have to forward EAC/AA data to PDSOs and that this is carried out by the relevant supplier agent.

B Alternative Modification for NHHDCs or NHHDA's to be required to provide PDSOs with a regular 'snapshot' of AA and EAC data, e.g. monthly, quarterly or annually

The implementation of the Alternative Modification will not impact on our systems and processes.

Comments:

C Alternative Proposal for PDSOs to install their own metering systems at Feeder level in their own networks

The implementation of the Alternative Proposal will not impact on our systems and processes.

Comments:

Name: Paul Jones
Organisation: Powergen plc
Date: 19 November 2001

P43_ASS_012 – Scottish Power

Thank you for this opportunity to respond to the Consultation / High Level Impact Assessment for Modification Proposal P43. While we have no requirement to receive this data at present, we support the proposal that it should be available to those Distributors who do. Please accept this as being representative of the views of SP Distribution Ltd. and SP Manweb Plc.

Regards,

James Nixon

Design Authority, Deregulation Services





Calanais Ltd for ScottishPower & Manweb

Int - 700 2316 Ext - 0141 568 2316

<http://asg.scottishpower.plc.uk> <<http://asg.scottishpower.plc.uk/>>

(Intranet)

Responses to HLIA of Modification Proposal 43 Provision of Annualised Advance (AA) and Estimated Annual Consumption (EAC) Data.

Carried out by	Approve	Reject	Comments
Stuart Turner EME Distribution			 Mac Word 3.0
Martin Damti/ Brian Nichol Northern Electric Distribution	✓		We STRONGLY AGREE with the changes proposed in MP43. Notification required – 0 days. Impact – Yes
Lina Shah Siemens Metering (Wollaton)	✓		I agree with the proposed changes. Impact – Yes Comments: This will mean a change to M98 to allow D0019's to be sent to the Distributor but that should not be a problem.
Roger Grew Siemens Metering (Ruddington)	✓		I agree with the proposed changes. Impact – No Comments: No direct Impact.
Clive Cushen ELEXON			In a similar way to P40, the solution options A & B that place obligations on NHHDCs could have an impact on Performance Mgt Dept if it is determined that their performance needs to be measured in some way. Such a requirement may also need to be covered in the agent certification process. Otherwise these options have a similar impact Design Authority maintained products as follows: Business Process Model – estimated at 3 mandays including review cycle SVA Data Catalogue - estimated at 3 mandays including review cycle
Derek Livesy United Utilities			 CPC 64 Response form.doc
Sue Fraser SEEBORD			 P43 Consultation Annex 1 - SEEBORD RESPO
Corrina Harvey IMServ Europe			No comment.
Helen Lees Npower Ltd. Npower Direct Ltd. Npower Yorkshire Ltd.			Npower Ltd, Npower Direct Ltd and Npower Yorkshire Ltd would like you to make reference to the response that we are submitting to the Modification Consultation questionnaire contained within Attachment 1 of Annex 1, when reviewing the responses to the HLIA on CPC64 (MP43). The response to the Modification Consultation questionnaire is being submitted separately to this HLIA response.
Edward Coleman TXU Europe			 Mac Word 3.0
Sue Macklin Scottish Southern Electricity			SSE doesn't agree with this proposal because it is only PDSOs who have not installed their own metering systems at feeder level in their own networks who need it.