Appendix C -- P99 Party and Party Agent Impact Assessment

Responses for MC00017

DLIA of P99

Responses due 31 October 2002

Organisation	Comments
Jonathan Purdy SEEBOARD Power Networks	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** There will be no impact on the cessation of creating and providing the existing SMRS serials. There will be minimal impact on providing the new SMPRS serials (SP07) There will be minimal impact on amending our SACR review process to meet the proposed Requirements. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** We would not be willing to participate in the submission of the one SMRS serial via the DTN, preferring to maintain the use of e-mail. **What timescale would your organisation require to implement the changes associated with P99?** Providing we are not required to provide the one serial via DTN, all the other changes can be implemented within 3 months of notification.
Graham Smith Western Power Distribution	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** Development work will be required to deliver changes to PARMS report requirements. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** Further development work will be required to produce the required data flows, plus possible changes to business processes. **What timescale would your organisation require to implement the changes associated with P99?** The main impact is the changed PARMS reports. To make the changes needed we will require six months notice. If it is mandatory to use DTN flows for the reports a further three to six months notice will be needed.

Rachel Gardener Aquila Networks	**Do you support the changes proposed for P99?** *Probably* **What impact, if any, there will be on your organisation?** *The document is not specific enough to say. It's difficult to determine exactly what is now required from MPAS Service Providers. Assuming that we are expected to provide data for SP07 and that it's format is similar to the existing PRS MSID report, the change would be minimal and the impact would therefore be fairly low.* **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** *This is not our preferred approach.* **What timescale would your organisation require to implement the changes associated with P99?** *This depends on whether our assumption is correct. If it is, probably in the order of 10 months.*
Sue Macklin Scottish and Southern	**Do you support the changes proposed for P99?** No. We agree with the proposed changes for PARMS and Entry Testing, subject to further clarification on detail of PARMS serial changes being discussed at a pre-implementation workshop. However, we do not agree with the proposals for Accreditation, in particular re-certification. The Market been operating for five years and has had time to mature and 'bed down'. Part of the initial Accreditation process is to ensure that participants have robust change processes, and participants are frequently monitored through Technical Assurance checks. All this would seem to make the concept of continuing the re-certification process overly bureaucratic and costly. Currently, the onus is on the participant to ensure that it operates according to the prescribed standards - which is as it should be. Requiring participants to notify BSCCo Technical Assurance of every change, regardless of the level of risk, is a step backwards, it introduces an element of 'nannying' and may increase cost. The commercial interests of Market Participants provide a strong motivation to maintain compliance with BSC requirements, as failure to comply may put them out of business. Since 1998 what instances have there been of a participant making changes to either their systems or processes which have had a significant detrimental effect on Settlements? Giving PAB the option of asking participants to re-certify may build in unnecessary delay to a the De-accreditation process. If PAB requests a

	participant to recertify and that participant fails to achieve re-certification PAB can still invoke the De-accreditation process but it will be at a later stage. The proposals are trying to reduce the amount of work but the fundamental question of why the work needs to be done at all hasn't been addressed. **What impact, if any, there will be on your organisation?** The serials cover a wide range of activities and processes and as such require analysis of development in a number of systems. Because of the introduction of data verification system changes will be more exhaustive than for serial changes only. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** SSE are not interested in the use of the DTN **What timescale would your organisation require to implement the changes associated with P99?** A minimum 6 months from the time the final detail of the serials is confirmed.
Clare Talbot National Grid	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** Limited impact identified. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** N/A **What timescale would your organisation require to implement the changes associated with P99?** N/A
Ros Parsons Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd	**Do you support the changes proposed for P99?** In principle we agree but as a Supplier and Party Agent, we would wish to see additional details and clarification in the requirements specification in order to fully assess the implications. There is a risk that the proposal will create the biggest commercial risks for small suppliers and others reliant on 3rd party Agents. **What impact, if any, there will be on your organisation?** Update of SACR in line with the new return in case re-certification needs to be invoked. Changes to the change management and risk assessment processes to track the four additional points that trigger re-certification. Agents will bear a significant cost in developing systems to enable them to send the serials in the correct format.

	Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?
	Increased MDNS costs. Depending upon volumes, we may need to increase the capacity of the hardware. Configuration of the gateway, amending routing tables. Would we have to have a different DTN flow for each serial? If so, this would be cumbersome and would also carry a cost implication, which we feel is unnecessary. We would therefore welcome further definition of the process for sending PARMS data through the DTN in order to fully assess the additional impact. **What timescale would your organisation require to implement the changes associated with P99?** Minimum 6 months.
Margaret Brunton Npower Northern Ltd, Npower Northern Supply Ltd	**Do you support the changes proposed for P99?** In principle we agree but as a Supplier and Party Agent, we would wish to see additional details and clarification in the requirements specification in order to fully assess the implications. There is a risk that the proposal will create the biggest commercial risks for small suppliers and others reliant on 3rd party Agents. **What impact, if any, there will be on your organisation?** Update of SACR in line with the new return in case re-certification needs to be invoked. Changes to the change management and risk assessment processes to track the four additional points that trigger re-certification. Agents will bear a significant cost in developing systems to enable them to send the serials in the correct format. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** Increased MDNS costs. Depending upon volumes, we may need to increase the capacity of the hardware. Configuration of the gateway, amending routing tables. Would we have to have a different DTN flow for each serial? If so, this would be cumbersome and would also carry a cost implication, which we feel is unnecessary. We would therefore welcome further definition of the process for sending PARMS data through the DTN in order to fully assess the additional impact. **What timescale would your organisation require to implement the changes associated with P99?** Minimum 6 months.

Man Kwong Liu Scottish Power	**Do you support the changes proposed for P99?** Yes in principle, but subject to the following comments:- We support most of these changes in particular those improve Performance Assurance in the market. However, we are concerned with the costs relating to the PARMS Serials and Standards changes and are not convinced that the benefits from these changes are worth the costs involved. Please also see our comments on the P99 Assessment consultation. **What impact, if any, there will be on your organisation?** Major impact on all agents and supply systems. There will be considerable resourcing issues with both implementation and on going from there. The Accreditation Process would be simplified, there would be of benefits in both time and costs, there would be no system changes involved. The Entry Process procedures would be simplified and would also be of cost and time benefit. There does not appear to be any changes to the testing that would require to be carried out. However, the proposed changes to PARMS Serials and Standards would have a significant impact on ScottishPower Supply Business from both a practical and financial perspective. System changes and staff training would be required; this would take time and effort and involve significant amount of money (a previous estimate of £6k per Serial (Report)). There is also a financial concern caused by the Elexon Change to PARMS - who will pay for these changes - will this cost be shared throughout the market. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** From an operations point of view we do not support this. A number of reports will involve some form of manual checking and it would be easier just to amend a report where necessary to email than to make changes to a flow. Also, reports could be sent / received in the same format if Elexon specified exact formats and use email. We have concerns with costs and the significant system impacts with this. The changes, new data flows, would also have to go through the MRASCo Change Processes and be considered by the MRA Development Board. In addition MDD may need to change to include a PARMS Role Code - more cost to the market. **What timescale would your organisation require to implement the changes associated with P99?** If these changes were to be accepted and taking into account the fact there would be system changes involved I would require minimum 6 month implementation timescales.

Alan Knight-Scott (PACA) and Anne Stone (BCA) LE Group	**Do you support the changes proposed for P99?** Yes, we believe that the proposed changes will facilitate improved performance reporting. **What impact, if any, there will be on your organisation?** Changes will be required to our Supplier and, in particular, Supplier Agent systems. The changes for the Supplier Agent systems will require a lot of development resources and training. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** It is not clear from the information we have been provided how much this would impact us at present. However, we would anticipate system development for processing information into the as yet unknown DTN flows would be large enough to make up as much development and training work as the changes required for the new PARMS data submission via email. **What timescale would your organisation require to implement the changes associated with P99?** As a result of current work on our Supplier Agent and Supplier Retail systems we have no resources to deal with these changes straight away (i.e. we are currently at capacity dealing with dual fuel billing changes and the integration of the Seeboard MOA system). As a result it will be at least 18 months until changes can be introduced to the Supplier Agent systems.
Ken Marchant BizzEnergy	**Do you support the changes proposed for P99?** BizzEnergy rejects the proposals because the penalties will still be on the Supplier, however the supplier will not have any influence over the agents quality of data except through individual agreements. **What impact, if any, there will be on your organisation?** Medium impact – internal processes will have to be reviewed and updated. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** The collation into Data Flow format might be a major impact depending on the format adopted. Currently we submit in the standard Elexon file format so if this was adopted, we could adjust with minimal impact. E-mail works perfectly well at present. **What timescale would your organisation require to implement the changes associated with P99?**

	Six months notice.
Damian Bannister IMServ	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** This is considered to be a medium risk change. IMServ will be impacted in all our market roles: HHDC, HHDA, NHHDC, NHHDA, MOA. Changes will be required to core systems in order to implement the new PARMS. There will also be changes to some reporting within suites such as Crystal, and processes and procedures will be affected in order to implement the new report formats. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** We agree in principle with the use of the DTN, as this would benefit the PARM process for the Industry as a whole. We do not feel that there are benefits to individual participants however. We would have expected that if this were to be introduced it would be incorporated into the DTC, so as to completely standardise the process. However we understand that the intention is to make an optional service available through Electralink, which will be chargeable to those who wish to participate. This would mean that should we wish to participate we would be subject to implementation and running costs for little or no gain to the processes at IMServ. **What timescale would your organisation require to implement the changes associated with P99?** 6 months minimum lead time is required.
Dave Morton SEEBOARD	**Do you support the changes proposed for P99?** Yes. **What impact, if any, there will be on your organisation?** New software for collecting data for new serials and changes to existing software to take account of amended requirements, mainly removal of serials that we currently supply. **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** Timescales and costs would both increase. **What timescale would your organisation require to implement the changes associated with P99?** Between 9-12 months, but we need to get full requirements specification to give a more accurate view. This should be completed prior to modification report being sent to Authority for a decision, as it would impact on timescales detailed.

Sue Calvert YEDL	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** Given the current information available, low **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** We would not support the change, as the benefits would not outweigh the cost. **What timescale would your organisation require to implement the changes associated with P99?** Given the level of detail, 3-9 month for new reports, zero time to halt sending reports.
Sue Calvert NEDL	**Do you support the changes proposed for P99?** Yes **What impact, if any, there will be on your organisation?** Given the current information available, low **Some participants have expressed an interest in submitting PARMS data via the Data Transfer Network. What additional impact, if any, would there be on your organisation if this approach were adopted?** We would not support the change, as the benefits would not outweigh the cost. **What timescale would your organisation require to implement the changes associated with P99?** Given the level of detail, 3-9 month for new reports, zero time to halt sending reports.