

**CPC00604 – Impact Assessment of Responses for DCP0007, CP1182 v3.0, CP1189, CP1190, CP1191, CP1193, CP1194, CP1195, CP1196, CP1197 and CP1200 etc.**

DCP0007

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	DCP has no impact on the MRA Product set	-	-
Scottish and Southern Energy plc	✓	-	X	-
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	<b>Neutral Comment:</b> Would appear to more likely impact meter manufacturers rather than meter operators.	X	-
Western Power Distribution	✓	-	-	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	-	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation	✓	-	X	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.				
E.ON UK Energy Services Limited	-	-	-	-
SSIL HHDC	✓	<b>Agree Change Comment:</b> A more prescriptive approach would seem sensible.	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<b>Agree Change Comment:</b> This draft change proposal suggests adding a sample protocol test to BSCP601 which we believe adds clarity to the procedure.	-	-
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power & Energy Trading Ltd, British Energy Direct Ltd, Eggborough Power Ltd	X	<p><b>Disagree Change Comment:</b> We disagree with this change on the basis that the redlined changes to BSCP601 are not consistent with the description of the problem/issue as stated in the DCP documentation. Although the objective of providing clarity for applicants seeking protocol approval has been achieved to a certain extent, other changes to the BSCP have been made without justification (see additional comments for specific examples).</p> <p><b>Other Comments:</b> Could the numbering of Section 4 - Test Procedure be reviewed prior to publishing the revised BSCP. Currently Section 4.1 leads into 4.2 which in turn leads into 4.1.1.</p> <p>In Section 3 - References, ELEXON have removed a number of references to European Standards. The DCP states that the substantive changes include additions of a sample protocol test schedule and an explanation of</p>	X	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>protocol. I presume that the European Standards have been removed due to them being obsolete. If this is the case then this should be stated in the DCP documentation to justify their removal.</p> <p>Given (a) DCP0007 seeks to clarify applications for Protocol Approval and (b) the revised Attachment A definition for "Applicant" refers to Protocol Approval, why has the term "Approval" been deleted from the document title?</p> <p>Attachment A : 4.1.3 : The expected result should be stated against Test 5.</p> <p>Attachment A : 4.1.4 : Tests 6 &amp; 7 should be repeated for GMT +10 Mins and +22 Mins respectively to confirm expected results regardless of whether the Outstation clock is fast or slow.</p>		
Siemens Energy Services	✓		✓	90

Comments on the redline text

No.	Organisation	Section	Comment
1	Siemens Energy Services	Page 11, 4.1.2.1 (currently with strikethrough)	I would expect that there would retain a timetable clause along the lines of: "The Test Laboratory shall complete all compliance testing within a timeframe as agreed with the applicant and BSCCo prior to the commencement of any testing."
2	Siemens Energy Services	Page 8	What are the constraints in section 4.1?

3	Siemens Energy Services	Page 8	Assuming 4.1 Constraints is retained (see Point no. 2) .... Shouldn't 4.1.1 Test Schedule be numbered as follows: 4.3 Test Schedule, 4.3.1 Record Details (additional sub-heading), 4.3.2 Data retrieval, 4.3.3 Passwords, 4.3.4 Time re-set, 4.3.5 Flags, 4.4 Timetable (see Point no. 1)
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Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	<p>There is no impact from this CP; however, when CPs are raised to remove the service specific PSLs and move certain clauses into the relevant BSCPs there will be an impact on the MRA Product Set. Documents within the MRA Product Set often reference service specific PSLs and sometimes reference sections within the PSL. As and when CPs are raised against individual PSLs changes will be required to:</p> <ul style="list-style-type: none"> <li>• The MRASCo Model</li> <li>• Definition of 'Nil Advance to Meter Procedure' in the MRA</li> <li>• Working Practice Product Set (including WP6, WP59, WP116, WP119, WP122, WP123, WP131)</li> <li>• MAP08</li> </ul> <p>The changes are all relatively minor in nature; however, the MRASCo Model in particular is a fairly complicated document and drafting the relevant MRA CP to give effect to the BSC CP will, we estimate, take one month in elapsed time to draft.</p> <p>For general guidance, we believe that a lead time of 3 months is required from receipt of formally approval by the relevant Panel Committee to implementation of the changes to the MRA Product Set.</p>	-	-
IMServ Europe	✓	-	X	0
Imserv - UKDC	✓	-	X	-
Siemens Energy Services	✓	-	✓	90
Scottish and Southern	✓	-	X	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Energy plc				
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	✓	<p><b>Agree Change Comment:</b> Agree as users will only have to refer to one document which should help with finding information required and reduce the time taken to find the information.</p> <p><b>Impact Comment:</b> Staff will need to be made aware of the change so processes will need to be updated.</p> <p><b>Implementation Comment:</b> No impact on systems so November 2007 planned release date is not a problem.</p>	✓	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	-	X	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	<b>Implementation Comment:</b> Changes to our internal processes will be required	✓	90
E.ON UK Energy Services Limited	✓	-	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p><b>Agree Change Comment:</b> As the generic PSL does not make any change to current MOP obligations it is not expected that there will be any impact on existing MOP systems or processes.</p> <p>Whilst it appears that most of the passages from the NHHDC PSL 120 v17.0 are present in the same or virtually similar forms in the generic PSL, there is a concern that some passages have been re-worded or have small additional elements which were not present previously, (see below for examples).</p> <p>The change proposal discusses merging the PSL requirements but does not mention introducing new ones. We ask for confirmation that the requirements in the generic PSL are unchanged from current requirements. This will enable us to support an implementation date of November 2007.</p> <p>Further to this, the change proposal mentions that non functional requirements will not be removed from the existing PSLs as part of this process and we question whether this will introduce ambiguity and confusion.</p> <p><b>Impact Comment:</b> It is expected that there will be no impact provided that the generic PSL does not impose any new or amended requirements when compared with current requirements.</p>	X	-
British Energy Direct Ltd	✓	<b>Agree Change Comment:</b> Existing PSLs must not be withdrawn until all related functional requirements are transferred to appropriate BSCPs.	✓	30

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p><b>Impact Comment:</b> A review and update to our processes will be required.</p> <p><b>Other Comments:</b> Costs associated with maintaining a large number of Party Service Level documents should be reduced.</p>		
Power Data Associates	✓	<p><b>Agree Change Comment:</b> The resulting changes to combine PSL170 &amp; BSCP520 is where some issues will arise. Currently the PSL &amp; BSCP have subtly differing text, which will need resolution when PSL170 is 'killed off'</p> <p><b>Impact Comment:</b> Operational procedures, contractual obligations</p> <p><b>Implementation Comment:</b> November 2007 for this change, but indeterminate for the combination of BSCP520 &amp; PSL170</p>	-	-

Comments on redline text

No.	Organisation	Section	Comment
1	Scottish and Southern Energy plc	Typo on page 2	<ul style="list-style-type: none"> <li>• Data Aggregators (Half Hourly and Non-Half Hourly) (NHH<del>D</del>A<del>s</del> and NHH<del>H</del>A<del>s</del>); <i>[should be NHH<del>D</del>A<del>s</del>]</i></li> <li>• Data Collectors (Half Hourly and Non-Half Hourly) (NHH<del>D</del>C<del>s</del> and NHH<del>H</del>C<del>s</del>); <i>[should be NHH<del>D</del>C<del>s</del>]</i></li> </ul>
2	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Backup and Disaster Recovery Paragraph 2.3.2	Under Section 2 in PSL 100 'Service and System', specifically with regards to section 2.3 Backup and Disaster Recovery there is an additional paragraph 2.3.2 that does not as far as I can tell appear in PSL 120. For reference paragraph is: 'Without prejudice to any of the provisions of this PSL, the Market Participant shall take reasonable steps to avoid any disaster which might affect their services. If this is not possible they shall minimise the disruption and impact of the disaster by implementing plans and procedures as described in 2.3.1 for backup and recovery should the need arise to ensure that the Market Participant is able to continue to provide services as set out under the BSC and CSDs.'
3	Npower Limited, Npower Northern Limited, Npower Northern Supply	Section 2.1	Under Section 2 in PSL 100 'Service and System', specifically with regards to section 2.1 System Availability as far as I can tell this does not appear in PSL 120.



	Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	System Availability	
4	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Section 3.4 Access Control	<p>Under Section 3 in PSL 100 'Security/Access', specifically with regards to section 3.4 Access Control there are some additional words incorporated into section 3.4.1 and 3.4.1.1 compared to PSL 120 - these have been highlighted in bold below:</p> <p>'3.4.1 The Market Participant will ensure that, controls shall exist to ensure that risk of intentional errors/fraud is minimised. Such controls should include mechanisms which ensure that access to data and documentary evidence is restricted <b>to the appropriate individuals</b>. Basic steps that would normally be expected to achieve adequate control in this area include:</p> <p>a security policy communicated to all employees at the Market Participant's organisation and strongly endorsed by management;</p> <p>procedures in place to ensure periodic reviews of security policy;</p> <p>clear data ownership and ownership of all significant information assets including information, software, and physical assets; and</p> <p>compliance with legal, contractual and Qualification requirements.</p> <p>3.4.1.1 If computer systems are used by the Market Participant, controls should, <b>in addition</b>, include:</p> <p>restricting access to computer hardware, <b>being tangible computer equipment</b> such as terminals, cables, disk drives, <b>servers, disks</b> and magnetic media (e.g. tapes);</p> <p>restricting access to software, <b>being and computer programs and all user documentation in respect of such programmes</b>, as well as systems level access, application level access and access to particular programs; and</p> <p>restricting access to hard copy reports produced by the computer systems.'</p>
5	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited,	Section 4.2 Access to Non-Computeris	<p>Under Section 4 in PSL 100 'Data Confidentiality', specifically with regards to section 4.2 Access to Non-Computerised Records as far as I can tell this does not appear in PSL 120.</p>

	Npower Direct Limited	ed Records	
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CP1189

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
SmartestEnergy Ltd	X	<p><b>Disagree change comment:</b> This Change Proposal is wholly inappropriate and compounds a deficiency in the Balancing and Settlement arrangements; the distribution companies do not declare their methodologies for LLF calculation in any detail and the SVG has no understanding of whether the values are accurate or not. And yet SVG approves LLFs and they have a significant impact on settlement. If LLFs less than one are to be allowed, how are we to know that they are accurate and indeed reflect the beneficial impact of embedded generation which, to some extent, must exist in all cases. SVG needs to audit and control the LLF calculation process otherwise it is not performing its role in approving the LLFs.</p> <p><b>Implementation Comment:</b> SmartestEnergy could cope with this change with immediate effect, but it should not occur until SVG has control of the issue.</p>	X	0
IMServ Europe	✓	-	✓	90
Siemens Energy Services	✓	-	✓	90
E.ON UK plc	✓	<p><b>Agree Change Comment:</b> Removes a restriction to cost reflective calculation of LLFs.</p> <p><b>Other comments:</b> CP1189 seeks to remove a long-standing limitation in the calculation of Line Loss Factors (LLFs). We agree that the cost of power lost over a distribution network should be allocated to parties in a</p>	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		way that reflects the extent to which they gave rise to those losses. The ability to set LLFs of less than 1 is consistent with this and the proposer's red-line text provides a concise solution.		
Scottish and Southern Energy plc	✓	<b>Agree Change Comment:</b> Not implementing this change could lead to inaccuracies in settlement however there would need to be a strong case for allowing SVA Line Loss Factors of less than one so would expect a proper explanation from the DNO as to how and why they came up with the LLF.	X	0
EDF Energy, Supplier Response	✓	-	X	-
Western Power Distribution	✓	-	-	30
SAIC Ltd. <b>Response provided on behalf of:</b> SP Manweb plc. SP Distribution Ltd.	✓	Happy with redline text for BSCP528, section 1.3.	X	0
E.ON UK Energy Services Limited	✓	<b>Agree Change Comment:</b> This would allow for realistic Line loss factors to be developed	X	-
SSIL HHDC	✓	<b>Impact Comment:</b> Will need to check and possibly modify Aggregation code to accommodate this.	✓	60
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower	-	<b>Neutral Comment:</b> In a test environment the scenario of LLFs less than Unity resulted in the production of negative aggregate line loss values.	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited				
British Energy Direct Ltd	X	<p><b>Disagree Change Comment:</b> Without more transparency of the methodology for determining LLFs (and thereby the effective charge faced by suppliers for distribution losses) we cannot be sure that LLFs are appropriately calculated. LLFs less than 1 associated with generation could be inconsistent with demand at the same location and could lead to double counting of losses. Transparency of the LLF calculation process would allay these concerns as it could be determined what portion of the losses have been allocated to the point of generation and what has been allocated to the point of supply.</p> <p>We are concerned that the proposal as it stands could result in an underreporting of generation and an over- reporting of supply for Settlement.</p> <p><b>Impact Comment:</b> System testing would be required to confirm that LLF values less than one can be automatically loaded and manually amended successfully.</p>	✓	90
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	X	<p><b>Disagree Change Comment:</b> Although, we understand that this change is an attempt to improve accuracy we have a number of reservations...please see other comments.</p> <p><b>Impact Comment:</b> SP systems and processes will require changes.</p> <p><b>Implementation Comment:</b> 180 days is an absolute minimum and, pending the results of a more detailed impact assessment, could increase.</p> <p><b>Other Comments:</b> The DTC will need to be changed to account for '+ / - num' in the logical format of the 'Aggregated Supplier Line Loss' field.</p>	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>ScottishPower believes that this change should initially have been available for debate in the form a Draft Change Proposal. As it stands, in ScottishPower's opinion, CP1189 requires further development to fully identify the costs and benefits of implementation e.g. what Settlement error is currently attributable to this defect? What are the implications for Group Correction?</p> <p>Happy with redline text for BSCP528, section 1.3.</p>		

CP1190

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
Siemens Energy Services	✓	-	✓	90
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	-	-	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy	✓	<b>Agree Change Comment:</b> See comment below on redline text	X	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Retail Ltd. SP Transmission Ltd.				
E.ON UK Energy Services Limited	-	-	-	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p><b>Agree Change Comment:</b> Attachment A (BSCP509) provides a list of the MDD Entities and who the originator is for each one. However we think there should be more detail against "BSC Party" as there have been instances where the MDD Entity has actually needed to be submitted by a Distributor and not a Supplier, and this needs to be made clear.</p> <p>Attachment A (BSCP509) also refers to SSC1 and SSC2 forms and Unmetered Supplies Operational Information, stating that these are available on the BSC Website. Having searched the site it appears that these are not easy to find. We suggest that either an indication of the section of the site where these are located is included in the BSCP or that a link to these documents is provided on the BSCPs page in the forms column at the BSCP509 entry.</p> <p>CP1190 suggests that the form will be redesigned to state that the form must be submitted by an Authorised Person (where this is appropriate). We suggest that if this proposal is agreed that a 'Password' section is added to the form to ensure that the authorisation can be verified.</p> <p><b>Other Comments:</b> We would like to make the general comment that it would also be helpful if there was some facility available (for complex changes) to undertake a "test run "of the data through the Cap Gemini system prior to formally entering changes into the system in order to find out if they are correct or not.</p>	-	-
British Energy Direct Ltd	✓	-	X	0

Comments on redline text

No.	Organisation	Section	Comment
1	Gemserv Ltd	BSCP537, 2.1.18, Information required	Should read 'Panel' not PAB. The decision is 'Qualification Approval' not 'decision on addition'.
2	Gemserv Ltd	2.1.20	Why is this step specific to the SMRA? What about other Qualified Participants?
3	Gemserv Ltd	BSCP509, Section 2	Would suggest adding a footnote to BSCP531 to explain that this BSCP will be removed once the transition period for P197 is complete
4	SAIC Ltd.  <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	2.1.18	2.1.18 states 'After the panel decision' however it does not state a timescale i.e immediately after Panel or within x days that the appropriate action should be taken.
5	SAIC Ltd.  <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	2.1.20	2.1.20 states 'After the panel decision', again similar to comments re 2.1.18 no timescale is applied as to when the action should be carried out.
6	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0  Page 1 of 14	Suggest that the phrase ' the MDD publish is not as agreed' is changed to 'the MDD as published'



		Section 1.3 Bullet Point 2	
7	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0  Page 5 of 14  Ref 3.2.1	Suggest footnote 3 is deleted as it merely repeats what the 'When' and 'Action' entries indicate.
8	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0  Page 7 of 14  Ref 3.3.11	The 'To' column states that BSCCo submit the MDD CR to the Panel for approval. Is this a change from the current practice for this to go to the SVG for approval?
9	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0  Page 7 of 14  Ref 3.3.12	'When' column states 'At next Panel meeting' & as mentioned in the point above should this not refer to the Panel Committee, SVG?  And similarly in sections 3.3.13, 3.3.14 and 3.6.9
10	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited,	Redlined text based on	'Information required' column makes reference to PAB meeting dates. We suggest that this should be Panel Committee meeting dates.

	Npower Yorkshire Supply Limited, Npower Direct Limited	BSCP509 v13.0  Page 8 of 14  Ref 3.4.1	
11	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0  Page 10 of 14  Ref 3.6.9	'To' column states that it is the Panel who are notified of a housekeeping MDD CR. Should this be the Panel Committee instead?

CP1191

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
Siemens Energy Services	-	-	X	-
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	-	X	90
E.ON UK Energy Services Limited	-	-	-	-
Npower Limited, Npower	✓	<b>Agree Change Comment:</b> Whilst we agree that this may be the most	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		effective and timely solution we query whether it is not more appropriate to amend the contract following changes to the Service Line rather than the other way around. Shouldn't contractual arrangements accommodate the Code and it's subsidiary and supporting documents rather than the governance arrangements accommodating contracts?		
British Energy Direct Ltd	✓	<b>Agree Change Comment:</b> With removal of the ad hoc reporting service from SSL330, how will ad hoc reporting now be acquired? <b>Impact Comment:</b> A review and update to our processes will be required	✓	30

CP1193

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
Siemens Energy Services	-	-	X	-
Scottish and Southern Energy plc	✓	<b>Agree Change Comment:</b> This will improve the administration for both ourselves and CRA/BSCo	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	-	-	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd.	✓	<b>Implementation Comment:</b> This would be the minimum time required to allow the updating of internal processes and documentation.	✓	5

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SP Transmission Ltd.				
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	<p><b>Agree Change Comment:</b> We support this CP as we feel a single register of Authorised Persons will reduce duplication in our internal processes.</p> <p><b>Implementation Comment:</b> Changes will be required to our internal processes.</p>	✓	90
E.ON UK Energy Services Limited	✓	<p><b>Impact Comment:</b> Limited impact on LWPs</p>	✓	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p><b>Agree Change Comment:</b> We support this proposal as it will make the authorisations process more straightforward.</p>	-	-
British Energy	✓	<p><b>Agree Change Comment:</b> Submission of one form to CRA should streamline the current BSCP38 processes.</p> <p><b>Impact Comment:</b> A review and update to our processes will be required. Please see comments below on implementation issues.</p> <p><b>Other Comments:</b></p> <p>How will the changeover be managed? Will BSCCo transfer all records to CRA, or will all parties be required to complete new Form 5.1 and return to CRA within x-weeks of BSCP38 release date?</p> <p>We support the integration of the two Authorisation Registers with CRA responsible for its upkeep. We have some minor concerns with the integration process; theoretically, different Category A authorised persons could exist on the different existing registers, or the same person may</p>	✓	30

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>have different passwords with each registry. Hence some care will be need in the consolidation process. Perhaps a Category A person from the BSCCo register should authorise the details to be transferred in a similar manner to the annual review process.</p> <p>We have further comments on the use of Category A authorisations. This category is described as being for Changing Authorisations, although there are a few other specified uses, eg. submission for inclusion in the list of Validated Suppliers. It appears that Category A is also being accepted as an alternative for every other category, which we do not consider to be a valid use. Category A should be limited to its specified purpose only; Parties should be expected to consider carefully which are the appropriate categories for each individual and appoint accordingly. Despite the apparent current interpretation of Category A by Elexon and other parties, we have always ensured that category A authorised persons wishing to undertake relevant activities themselves under other authorisation categories are appropriately authorised for those activities.</p> <p>We expect the Elexon 'Online Forms' project to take into consideration this CP as part of its work.</p> <p>We are surprised that the estimated number of man days required for this CP is 34 and would expect it to be less.</p>		

Comments on redline text

No.	Organisation	Section	Comment
1	SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	Interface Specification Pt 1 (attachment B)	Error in footer.
2	SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	Interface Specification Pt 2 (attachment C)	Error in footer.
3	SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	Interface Specification Pt 2 (attachment C)  3.1.3	Missing space between "Issue" and "Authentication"
4	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	<b>BSCP38_v0.4</b> p1, 1 <sup>st</sup> paragraph	Replace 'or' with a comma - ... CVA MOAs <del>or</del> , Licensed Distribution System Operators and BSCCo.



5	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p1, 2 <sup>nd</sup> paragraph	We would suggest the wording of this paragraph is amended to state that confirmation of Authorised Persons needs to be undertaken annually rather than by the anniversary of the commencement of authorisation. This would reflect current practice as Elexon recently sent notification of this requirement via Newscast, issue 135. The current wording implies that the list needs to be reviewed more than once a year.
6	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p1, final paragraph under 1.2	Reference is made to BSCP533 'PARMS Data Provision'. For consistency, we believe the Authorisations for these activities are also included within BSCP38.
7	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p1, 1.3 'Authentication Guidance'	Are there no BSCP forms to be submitted to the BSCCo, for example, BSCP25 / 5.1
8	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	P2 1.4 (b)	Should the timescales be agreed between the CRA and Recipient, and not agreed by the CRA alone as the wording suggests?
9	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p3	1.6 Associated BSC Procedures. Does BSCP537 'Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs' need to be added to the list as this has a go-live date of 23 <sup>rd</sup> August 2007.
10	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p5	Footnote 4 – is this footnote now redundant as the CRA will naturally be notified of a cancellation of authorisation, whether it is due to personnel leaving an organisation or changing role within an organisation. If it is felt that it is necessary to give a reason for the cancellation then we suggest that this is added to the relevant form.

11	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p5	A new footnote, no. 6, is referenced under 3.1.2 but the footnote is located on the following page. Should this be moved to page 5?
12	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p6	Ref 3.2.1 'When' is stated as 'As Requested'. Recommend this is changed to 'Annually'.
13	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p7	Footnote 7 'Notification may be via Email ...' is rather vague and therefore seems pointless.
14	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p7	Category A – under BSCP column – is stated as N/A. Should this be replaced with BSCP38?
15	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	P7	Category E – under BSCP column – should BSCP511 and BSCP512 be replaced with BSCP537 (due to P197)?
16	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p9	Category S – under Description column – suggest a footnote is added to clarify that the form must be submitted via fax or post.

17	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p9	Category U – under BSCP column – replace BSCP531 with BSCP537 (due to P197)
18	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	P10	Category Y – under Description column – the description of Originator could be expanded to actually state what action is required, as detailed for all the other categories.
19	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p13	Confirmation that wording for 'K' is correct as 'or Volume Notification Nullification Requests' is missing compared to present BSCP38.
20	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p14	Confirmation that wording for 'W' is correct as 'Accept or Reject automatic Standing Data Changes' is missing compared to present BSCP38.
21	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p14	The process for 'Z' is completely re-worded?
		<b>Interface Specification Part 1_DCR</b>	
22	Npower Limited, Npower Northern Limited, Npower Northern Supply	p2	'C' – activity is different to current BSCP38 which states 'Site Witnessing of Meter Readings'

	Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		
23	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p2	'D'- activity is different to current BSCP38 which states 'On-Site Meter Readings'.
24	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		'EA' – it is not clear from the redlining what this actually means?
25	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p2	'G' – activity is different to current BSCP38 which includes 'Deregistration'.
26	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p2	'K' – activity is different to current BSCP38 which includes 'or Volume Notification Nullification Requests'
27	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p2	'M' - activity is different to current BSCP38 which states 'Amendments to Non Confidential Report Requirements'
28	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited,	p2	'N' – activity is different to current BSCP38 which includes 'Provision of Credit Cover'

	Npower Yorkshire Supply Limited, Npower Direct Limited		
29	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p3	'W' - Confirmation that wording for 'W' is correct as 'Accept or Reject automatic Standing Data Changes' is missing compared to present BSCP38
30	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p3	'Z' - '... access' has replaced 'Administration' from current BSCP38?
31			'ZA' – activity is different to current BSCP38?
		<b>Interface Specification Part 2_DCR</b>	
32	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	p3 4.2	ITT reference: should CP1193 be added?

CP1194

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
Siemens Energy Services	-	-	X	-
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	-	-	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd.	X	<b>Disagree Change Comment:</b> In principle, ScottishPower has no objection to the publication of Authorised Person's data on the BSC website, provided that ELEXON has first received the specific written permission of the persons involved.  However, ScottishPower does not believe that this information should be publicly available, but should be restricted to employees of the relevant Party.  Therefore, it is ScottishPower's view that where such lists are published on the BSC website, access to these must be password controlled, perhaps	X	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SP Transmission Ltd.		utilising my ELEXON, to enable such restriction.  This may already be the intention of ELEXON; however that is not reflected in the text of the Change Proposal. ScottishPower believes that it should be made clear to participants what security measures will be put in place.		
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	<b>Implementation Comment:</b> Minor change to our business process.	✓	90
E.ON UK Energy Services Limited	✓	-	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<b>Agree Change Comment:</b> We support the on-line publication of authorised person's data as it aids clarity.  We believe that only details of your own party should be available which could be achieved with a more defined log-on.  Finally, it is unclear whether the proposed solution which states that submission in writing by a Category A Authorised Person is the same as obtaining a release from each Authorised Person for publication of the information relating to them.  Does the proposal mean that the submission from the Category A person will be considered as a release for each Authorised Person within that organisation? Or does it mean that the agreement to have an on-line list for an organisation will be obtained from a Category A person initially and then BSCCo will follow this up by obtaining a release from each person on that organisation's Authorised Signatory list.	-	-
British Energy	X	<b>Disagree Change Comment:</b> Justification based on a desire to replace inadequate internal communications by parties is quite unacceptable. The authorisation process gives assurance to all parties that operational	X	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>processes are being operated by properly authorised persons. It provides protection against unauthorised persons either disrupting the settlement process or potentially creating disputable events, and also assists parties in managing their internal authorisation process. However, we do not believe that assistance to parties should replace the normal business responsibility of parties to manage their own internal authorisation process.</p> <p><b>Other Comments:</b></p> <p>The proposed publication of the list of authorised persons is for the benefit of the Party to which the persons belong and not all Parties in general. BSCCo's website is not intended to be a substitute for poor management by Individual Parties. We would be happy to support publication of Authorised Persons (subject to responsible Party approval) provided there would be some benefit to all Parties, for example if at least one form of contact detail was provided. This would facilitate the COBO process, setting up of new ECVNA Authorisations, etc. However, as contact details are not to be included we believe this CP is not making good use of responsible Parties money.</p>		



CP1195

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
IMServ Europe	✓	-	X	0
Siemens Energy Services	-	-	X	-
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	<b>Neutral Comment:</b> This does appear to be a removal of a level of 'red tape' where the registrant contacts the TAA for CVA audits. There should be no impact on MOAs as MOAs are not normally the registrant and is taking away an obligation rather than providing an additional one.	-	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	-	-
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy	✓	-	X	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.				
E.ON UK Energy Services Limited	✓	-	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	X	<p><b>Disagree Change Comment:</b> Our main concern with this proposal is that it is the Registrant and not the MOA who is responsible for the metering system. If this category of Authorisation is removed, how will the TAA obtain details of the Registrant to send the visit request? It does not seem that adequate steps are taken to ensure that the Registrant is informed of an impending visit.</p> <p>For instance on page 11 of BSCP27 it states that the Registrant is the Party responsible for providing access to the metering equipment and a revisit (for non-attendance) may be initiated at the expense of the Registrant if access cannot be gained or the MOA fails to attend the visit.</p> <p>How will the process ensure that the TAA has up to date contact details for the Registrant (and MOA)?</p> <p>Will BSCP27 be changed to place the obligation of the visit on to the MOA as the proposal seems to suggest? It is the Registrant who is ultimately responsible, not the MOA, so this should not be.</p>	-	-
British Energy	X	<p><b>Disagree Change Comment:</b> Although the proposed removal of authorised confirmation for TAA inspection visits would not represent a direct settlement risk, it could lead to wasted visits which the existing process is intended to avoid. A preferable solution would be for CRA to provide TAA with a list of Category I Authorised Signatories.</p> <p><b>Impact Comment:</b> Minimal impact on internal processes.</p>	✓	30

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p><b>Other Comments:</b></p> <p>We are not totally comfortable with the proposal to remove Category I, particularly under the CVA arrangements where the registrant is often the site owner and direct contact with the site owner is therefore possible. (Contrast this with SVA where the registrant is rarely the site owner).</p> <p>It appears that the TAA are not being provided with the list of appropriately authorised persons despite the fact that BSCP38 states that the CRA maintains the register on behalf of TAA, amongst others. If the CRA is required to provide a list of authorised persons to other Agents, then why not the TAA as well? Recent experience has shown that the former TAA did not have up to date CVA MSID details - either obsolete (some 20 months earlier) or a change of Registrant. Surely, TAA require a refresh of MSIDs before any sampling process is undertaken which could also include Category I personnel. Our main concern is that registrants are provided with the opportunity to at least postpone an inspection if it were not appropriate for it to proceed on the due date, a practice which we understand will continue. However, how will TAA know who the Party wishes to perform this task? Perhaps the new TAA website should not permit users to register unless they are appropriately authorised under BSCP 38, except possibly for a read-only role. What security checks are employed by TAA in allowing users to register on their website?</p>		

## Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
United Utilities	✓	<p><b>Agree Change Comment:</b> But only on the conditions detailed below.</p> <p><b>Impact Comment:</b> Not known</p> <p><b>Other Comments:</b> One of the main motivations for introducing a Central Management System CMS is to enable the Lighting Authorities to make significant energy savings over the current system. CMS would allow the Lighting Authorities to meet increasingly tight restrictions on energy budgets and reduce carbon emissions related to street lighting. Ultimately the introduction of CMS will reduce the overall energy bill for the lighting authority.</p> <p>Lighting Authorities already make large savings to their energy bill by not declaring equipment or inaccurately declaring equipment.</p> <p>For example it is already known that recently adopted section 38 sites, may not be declared on an inventory for many years if at all. Existing equipment may be declared at lower wattages than is the case and photocells maybe declared with lower burn hours than the cells on the street. It has also been known for photocells to be declared where none exist, for example in bollards or signs.</p> <p>All these inventory inaccuracies effectively reduce the true energy consumed by the street lighting equipment and result in the Lighting Authority being under billed for their electricity. The differences between declared load and actual load contribute distribution losses.</p> <p>A precondition to any Lighting Authority introducing CMS which is recognised by the local DNO must be a signed connection agreement and the provision of an up to date inventory which must meet a minimum accuracy level.</p>	✓	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>Before United Utilities can grant CMS status to a Lighting Authority sufficient safeguards would need to be put in place to ensure that equipment declared as CMS are in fact CMS.</p> <p>United Utilities also need to know what the full cost implications of introducing CMS will be both in terms of additional FTE activity for the UMSO and MA and IT costs for updating the charge codes in Lamp and any software upgrades. This information will need to come from St Clements Services and Symology. The contacts at these organisations are Bob Glover and David Anders.</p> <p>Any Lighting Authority wishing to introduce a CMS system would need to make a formal written application to the distribution company. Also the connection agreement may need to be changed to accommodate any new obligations placed on either party.</p> <p>It must also be a requirement that the Lighting Authority agree to their inventory being audited before a CMS system is introduced. If the inventory does not meet the minimum accuracy level required by the DNO then CMS status would be refused.</p> <p>It is important that before CMS is introduced the manufacturers should produce evidence to back up the power values of lamps which have been dimmed. For example a lamp which has been dimmed to 50% light out put does not reduce the power level by 50%. To help with this exercise it would be useful to obtain the power and consumption data for the many CMS test sites currently in operation around the UK.</p> <p>CMS systems have the capability of accurately recording the consumption and load values of individual lamps. Why are we not using these systems as an effective meter. This would eliminate the need to record this type of equipment on an inventory.</p>		
IMServ Europe	-	-	X	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Siemens Energy Services	✓	<b>Impact Comment:</b> This would require a system change	✓	90
Scottish and Southern Energy plc	✓	In the SVA Catalogue definition for Equivalent Meter Type under 'Notes' it says 'Name of equivalent meter used for unmetered supply' – is the intention to provide a list of EMs and update it each time a new EM is approved?	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	X	<b>Disagree Change Comment:</b> a) This development represents at best a 'half way house' - whilst the CMS concept will provide accurate switching time data, it will not improve the quality of load rating data which is already the major source of inaccuracy in HH UMS consumption data. Indeed, increased use of dimming without accurate knowledge of dimmed load ratings will further reduce accuracy of consumption data. b) With a modicum of additional effort, modern CMS systems could be further developed to provide accurate metered data, obviating the need to have unmetered supplies with their inherent inaccuracy. c) Major changes to Equivalent Meter software will be required, generating significant costs for MAs in buying, testing and validating software. These costs may not be recoverable from end customers under existing contracts	✓	180
Western Power Distribution	✓	<b>Implementation Comment:</b> We will need to make system changes if this CP is approved and will need up to 6 months to arrange this and implement. We would therefore consider a Feb 2008 implementation to be more appropriate than November 2007.	✓	180
E.ON UK plc, Powergen	-	-	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Retail Ltd, Citigen (London) Ltd, Economy Power				
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	<b>Agree Change Comment:</b> The adoption of CMS will benefit the HH UMS market by allowing greater adoption of energy saving apparatus and better accuracy at Settlement. The changes to the documents will therefore allow the adoption of CMS technology.  <b>Other comments:</b> We are comfortable with the concept of adding additional controls over the apparatus but would express caution at any move by current NHH sites looking to utilise this HH development. It should be noted that these multi-control sites may well exceed the allowed wattage under current Unmetered Supplies criteria.	-	90
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	<b>Agree Change Comment:</b> Although we agree with the principles of this CP, the proposed implementation date of November 07 is unrealistic as IT systems changes will be required.  <b>Impact Comment:</b> The IT System Changes required will involve having the new functionality built into our UMSO system to deliver the 'Control File' in the prescribed format. We will also require, the development of software tools to enable our interpretation of the Operational Log.  <b>Other Comment:</b> Whilst accepting vocal pressure from equipment manufacturers and others with vested interests the reality is that few, if any, local authorities currently have plans to roll out CMS systems on a substantive scale. Three large local authorities in our distribution regions are seeking to reduce electricity consumption. However, one is changing to Half Night and Pre-Dawn Switching using conventional technology and the other two are pursuing the Havard Electronic Gear option which offers fixed part-night dimming. The cost of full CMS systems would appear to inhibit significant take-up for the foreseeable future. Whilst the mechanisms must be brought in one might reasonably question the true	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		urgency. Delaying implementation to 2008 would allow both UMSO's and other industry parties to incorporate the required changes into our normal software release pattern.		
E.ON UK Energy Services Limited	-	<b>Neutral Comment:</b> As a HHDC we do not handle un metered supplies	X	-
Independent Consultant	✓	-	-	-
Central Networks	✓	<p><b>Impact Comment:</b> UMSO – Our Inventory Management system will require changes to enable production of the control file. It is not been possible to obtain a cost from our system software provider nor a lead in time.</p> <p>MA – The indicative charge for developing our MA system balanced against the income received from existing customers show that it would not be cost effective to change our system.</p> <p><b>Implementation Comment:</b> As an UMSO we anticipate being able to comply with the CP by the proposed November release date.</p>	✓	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p><b>Agree Change Comment:</b> Whilst we fully support the principles of CP1196, which will enable the opportunity for more sophisticated energy management in the Unmetered Supply market , we wish to temper this approval with the contention that the proposed implementation date of November 2007 is somewhat demanding.</p> <p>We are concerned that there are still issues around the introduction of Central Management Systems which have not been sufficiently resolved at this point, for example, those such as the technical detail on the percentages of Dimming which would be included in the Unmetered Supplies Operational Information.</p> <p>We recommend that an implementation date of February 2009 is agreed, rather than the November 2007 release date proposed by CP1196, to allow adequate time for robust definition of the necessary detail, and associated</p>	-	-



Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		system and process developments, to enable all relevant market participants to properly implement this beneficial and important function. <b>Implementation Comment:</b> See above, we recommend implementing this in the February 2009 release.		
British Energy Direct Ltd	X	<b>Disagree Change Comment:</b> Although supportive in principle, we seek clarification of the apparent possibility of the customer fulfilling the MA role. If the customer were to fulfil the MA role, a separate MA would be superfluous. However, should the customer adopt the role of MA, it should be accredited.	X	0
Power Data Associates	✓	<b>Impact Comment:</b> Systems, operational procedures & commercial agreements <b>Implementation Comment:</b> Nov 07 release is fine	✓	-

Comments on redline text

No.	Organisation	Section	Comment
1	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	BSCP 520 – Page 10 Section 4.5.2.3 (a)	Our view is that the final paragraph could be difficult to interpret. Our suggestion is the following revision: “The CMS controller devices operating each item of equipment should be summed and provided as a row(s) in the file body. Each different type of CMS controller shall have its own Charge Code and will be assigned a continuous Switch Regime of 998 and a CMS Unit Reference of ‘Control’”.
2	Independent Consultant	Page 2, section 1.3.8, 2 <sup>nd</sup> paragraph, 2 <sup>nd</sup> sentence.	When CMS is required the MA does not require a copy of the summary inventory. The MA requires a control file.

3	Independent Consultant	Page 6, section 3.13,	<p>It is not clear that approval can be sort for either</p> <p>(a) A CMS system producing the output file specified in section 4.5.2.3, sub-section (c); or</p> <p>A Dynamic Meter which accepts the files specified in section 4.5.2.3, sub-sections (a) and (c) and generates the HH data; or</p> <p>A system which combines the functions of (a) and (b).</p>
4	Independent Consultant	Page 9, section 4.5.2.3, sub-section (a)	<p>The filename should be specified. I suggest</p> <p><b>Filename: controlmmmmmmmyyyymmdd.log</b></p> <p><b>where:</b></p> <p><b>mmmmmmmm = Sub-Meter ID (alphanumeric)</b></p> <p><b>yyyyymmdd = date of inventory</b></p> <p><b>log = file extension</b></p> <p><b>with all characters in lower case</b></p>
5	Central Networks	BSCP520 Para 1.2.1 e)	<p>Previously the UMSO has been responsible for deciding what type of Equivalent Meter is used in its distribution area. We have previously declined the use of passive meters which rely on assumed switching times and take no account of weather conditions e.g. cloud cover affecting light levels. We have always insisted on dynamic meters which use actual switching data and in our opinion provide greater consumption data accuracy as a consequence. As my understanding of CMS is that it is a dynamic system then this change would appear to be superfluous and seems to diminish the UMSO power to insist on dynamic meters.</p>

CP1197

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
Siemens Energy Services	-	-	-	-
E.ON UK plc	✓	<b>Agree Change Comment:</b> No further from the DCP. A useful clarification.	-	-
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
Western Power Distribution	✓	-	-	30
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	-	X	0
E.ON UK Energy Services Limited	-	-	X	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<b>Agree Change Comment:</b> We support this change proposal.	-	-
British Energy	✓	<b>Agree Change Comment:</b> Adds additional clarity to BSCP75. <b>Other Comments:</b> As part of the update to BSCP75, it would be appropriate to amend form 4.2 to include the additional option CST (for constant) alongside MSQ, ER, BMU, GSP, DSCP or LLF. I suspect the option CST is not well known (I don't know of anywhere that it is listed).	-	-
United Utilities	X	<b>Disagree Change Comment:</b> Cost impact of changing our group take data validation system <b>Impact Comment:</b> As above negative cost impact	✓	-

CP1200

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Gemserv Ltd	-	-	-	-
IMServ Europe	✓	<p><b>Agree Change Comment:</b> As both a MOP and a DC we strongly support the removal of this requirement as this report cannot and has not provided the benefit that was originally expected.</p> <p>Due to the nature of the processes in question, it is not possible to provide a totally comprehensive and accurate report: any output therefore carries many caveats and is subject to dispute by the parties involved, thus causing doubt and at worst disregard for the instances reported.</p> <p>IMServ DC has attempted to run the report on several occasions, however for the above reasons has not implemented this as a regular process. It is reported that other Agents have taken a similar approach - in our role as a Meter Operator we have not received a report from another Data Collector for at least the last eighteen months.</p> <p>It can therefore be assumed that any improvements in the Proving Test process are not the result of the report in question.</p> <p>The fact that a CP was approved to remove the originator of the original requirements from the circulation of the report, reinforces the view that this process adds overheads to Data Collectors, Meter Operators and Suppliers for no perceivable benefit.</p> <p>Furthermore a recent system change to the Wheatley system (used by a number of Meter Operators) now ensures that Proving Tests are requested in the required instances. This provides the double benefit of reinforcing the Proving Test process and also negating the need for a monitoring process.</p>	X	0
Siemens Energy Services	✓	-	✓	90

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Scottish and Southern Energy plc	✓	-	X	0
EDF Energy, Supplier Response	✓	-	X	-
United Utilities	-	<b>Neutral Comment:</b> We have our own controls and processes in place to help ensure proving tests are completed in a compliant way.	-	-
Western Power Distribution	✓	-	-	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0
SAIC Ltd. <b>Response provided on behalf of:</b> ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	-	X	90
E.ON UK Energy Services Limited	✓	<b>Impact Comment:</b> Limited changes to LWPs	✓	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
SSIL HHDC	✓	<p><b>Agree Change Comment:</b> We strongly agree with this proposal. Reporting outstanding Proving Tests could never have been fully complied with by the HHDC. The requirement to request Proving Tests is an obligation on the MOP and if policing is required to ensure compliance, then this should be a role for Audit not HHDC.</p> <p><b>Impact Comment:</b> No action required.</p>	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	-	<p><b>Neutral Comment:</b> Whilst it is recognised that the situation has improved such that BSCCo no longer receives the Proving Test Out of Timescale Report, it is still noted in the change proposal that the issue is not completely resolved. Whilst a number of Agents do not/have never used the report we do not think that this is suitable justification for the proposal and would reinforce the need for the DC to be compliant with current requirements.</p> <p>However, if SVG concludes that the issue is sufficiently improved to allow confidence that all Proving Tests are carried out in a timely manner then we do not anticipate any excessive system or process changes as a result.</p>	-	-
British Energy Direct Ltd	✓	<p><b>Impact Comment:</b> A review and update to our processes will be required</p>	✓	30