

CPC00600 – Impact Assessment of Responses for DCP0001, DCP0002, DCP0003 and CP1188.

DCP0001 - Changes to incorporate Central Management Systems in Unmetered Supplies arrangements

General Comments

Organisation	Agreement (✓/X)	Comment	Impact (✓/X)	Mandays Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	<p>3.x Approval of Equivalent Meter</p> <p>3.x.8/3.x.9 UMSUG approve (or not) the EM then it goes to the Panel for approval. Should it go to SVG first? In CVA the metering dispensations are referred to ISG. Aren't EMs a kind of metering dispensation in SVA?</p> <p>4.5.2. a) & b) the examples should be removed. The definitions should be sufficient in their own right.</p> <p>4.5.2.3 b) with CMS are charging codes and TSRs necessary. Is this mandatory?</p> <p>Changes to SVA Data Catalogue – remove references to Lamp Lailoken and Flare.</p>	X	-
AccuRead	X	<p>Disagree Change Comment: The CMS seems to be very much like metering, why not make these systems metered?</p> <p>Other Comment: It is the opinion of the AccuRead Ltd that the CMS sounds like it does an awful lot of the same functions as a meter. If so, would it not be better to find a metering solution to these sites?</p>	-	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	X	<p>Disagree Change Comment: We are uncertain as to how these changes can be practically applied and in an efficient way by the MA/UMSO/CMS interface and feel that they would only cause more confusion. Certainly customers should see a unit consumption reduction if they are dimming, however we are aware that a 50% dimming reduction in lighting is only a 30% reduction in electrical consumption, therefore how can this be reflected in the customer's bill?</p> <p>Although we agree with the principles of these changes, we believe it</p>	✓	-

		<p>would be beneficial for an industry workshop to be arranged, where it could be explained in more detail how these processes will actually operate and be implemented.</p> <p>As the CMS is a certified system, could that system do all of the aggregation of data and produce a KWh value that is submitted to the MA/UMSO, the UMISO/MA could follow the existing process for the rest of the inventory that utilises the existing switching regimes then aggregate their two values.</p> <p>Impact Comment: System changes to accommodate the new charging code structure and for the periods of dimming.</p>		
CE Electric UK	✓	<p>Impact Comment: Our processes will need to be reviewed and updated in line with the amended BSCP if the proposal is accepted.</p> <p>Other Comment: We strongly disagree with the customer fulfilling the MA role and our preference is that the MA is independent from the customer.</p>	✓	-
British Energy Direct Ltd	-	<p>Neutral to Change Comment: If the customer were to fulfil the MA role, a separate MA would be superfluous.</p>	-	-
EDF Energy, Supplier Response	✓	-	X	0
Independent Consultant	✓	<p>Favoured Option: 3</p> <p>Other Comments:</p> <p><u>General</u></p> <p>Throughout the proposals there appears to be a basic confusion between the Central Management System controlling the unmetered equipment, lights etc., and the Equivalent Meter providing settlement data.</p> <p>There should also be a distinction between those parts of a Central Management System which are used to control the unmetered equipment, provide maintenance and management information and that part which is used to provide the data to the Equivalent Meter. In the</p>	-	-

		<p>same way that an UMSO is only concerned with the quality of the Customer's detailed inventory and not with the totality of the computerised asset management system which produces it, so a MA is only concerned with the with the quality of the data supplied to the Equivalent Meter.</p> <p>The Approval of a Central Management System should only be concerned with those elements which affect the quality of the data supplied to the Equivalent Meter. Other elements of the system are commercial matters which are not the concern of Settlements.</p> <p>The most likely scenario is that an MA will interface with the Customer who runs the CMS system. In my view very few, if any, Customers will wish to undergo Qualification and become accredited Meter Administrators. This separation of functions and the use of a common data format will enable any approved CMS system to be processed by any approved Equivalent Meter which will facilitate the market and promote competition. Separation of function will also split and simplify the approval process.</p> <p>There are already a number of different CMS models on the market and more systems are being developed. Each CMS system would be approved on its ability to provide complete and accurate data in the correct format to the MA. In contrast, it is likely that there will only be a few MA CMS Meter systems and these would be approved on their ability to process the data and comply with all the other Qualification requirements.</p> <p>It is also likely that CMS functionality will be added to the existing LAMP and Lailoken Equivalent Meters. The calculation process is the only difference between their current extensive functionality and a CMS meter. The addition of a CMS calculation module would therefore provide a very economical solution. LAMP and Lailoken already cater for sub-meters which are summated to provide an output at MSID level to the Data Collector. Therefore the facility for aggregating the output of a number of different calculations is already in use and there is no justification for the proposal to make a separate MSID for a CMS system mandatory.</p>		
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		<p><u>Proposed Changes to Appendix 4.5</u></p> <p>4.5.2(c) It would be better to use the term CMS Meters rather than Centrally-managed Meters. It is the unmetered equipment which is centrally managed not the meters.</p> <p>4.5.2.3</p> <p>Para 1 A centrally-managed CMS EM is one that is able to control and manage an Unmetered Supply dynamically, and which uses the detailed switching and load information recorded and reported by a Central Management System to allocate Half Hourly consumption data.</p> <p>Section b) Two values for the Time Switch Regime should be allocated; 998 for equipment continuously burning and 999 for switched equipment. This will enable a more accurate default calculation in the event of the operational event log not being available. (Continuously burning equipment may be included in a CMS system for management and fault reporting purposes.)</p> <p><u>Section c)</u></p> <p>Proposal 1 Not favoured.</p> <p>It has the disadvantage of requiring a large number of additional codes in the OID without any discernable benefit over proposal 3. It is not yet clear how many different levels of dimming will be required in practice. There are proposals for some installations to be permanently operated at slightly less than full power where the design allows this to be done whilst maintaining the required light levels. The possible reduction will be dependent on the original design so a number of codes may be required each for a slightly different level of dimming.</p> <p>Proposal 2 Not favoured.</p> <p>This proposal envisages a kWh recorder, i.e. a meter, at each unit with the readings being downloaded by the CMS system and summated by the Meter Administrator.</p> <p>This raises a number of questions:</p> <p>a) What will be the accuracy required from the recorder?</p>		
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		<p>b) What will be the approval requirements for the recorder?</p> <p>c) How often will the recorder require re-testing?</p> <p>d) Will a new Code of Practice be required? BSCP520 is specifically titled Unmetered Supplies.</p> <p>e) Will facilities to read the recorder in situ be required? How often will site readings be required?</p> <p>f) The recorder is likely to be situated at the lantern. This will be anything from 5 metres up to, as in the case of looped connections, several hundred metres from the Exit Point. Is this acceptable?</p> <p>g) Will the recorder provide HH data? If so, how often will the data be downloaded?</p> <p>h) As the energy consumption is being metered, why is it necessary to provide a detailed inventory? Why isn't the location (address) sufficient?</p> <p>Proposal 3 Recommended</p> <p>This is a practical proposal which can be adopted immediately.</p> <p>It is a simple extension of current practice; the only change is that the CMS system provides the switching data instead of the PECU array.</p> <p>The required data can be easily provided by all CMS systems with a simple addition to their software. This has been confirmed by all manufacturers contacted.</p> <p><u>Section e)</u></p> <p>It should be made clear that:</p> <p>a) this a text file;</p> <p>b) the filename is all lowercase (to avoid problems with UNIX servers).</p> <p>The proposed file body only contains the percentage load, not the full chargecode. The calculation is therefore relying on the detailed inventory which is only provided periodically. This will create exceptions when</p>		
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		<p>units are added, removed or altered between inventories. Including the full chargecode in the file body would resolve this problem.</p> <p>I would also suggest that an additional character is added which would be used to provide information. For example N=new, R=removed permanently, F=faulty or temporarily removed e.g. knocked down. This would provide a full picture of an active inventory and save a lot of queries.</p> <p><u>Section j)</u></p> <p>If two values for the Time Switch Regime are allocated say 998 for equipment continuously burning and 999 for switched equipment then this will enable a more accurate default calculation in the event of the operational event log not being available.</p> <p>Consideration should also be given to the capabilities of the individual CMS system. Some systems do not necessarily default to dusk to dawn operation if communications are lost, they may have local memory capacity which enables the affected units to continue operating in the same pattern as was last instructed. It would be up to the CMS manufacturer to reflect this in his output file.</p>		
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-
ICTIS	✓	<p>Implementation Comment: Lailoken has already been adapted to include CMS download and processing in line with the discussions of the expert groups conclusions. Any minor adjustment to this can soon be accommodated. Lailoken is to shortly test CMS proposals derived from the expert group meeting with live data from Harvard's Leafnut system.</p> <p>Other Comments:</p> <p><u>General Comments:</u></p> <p>The suggestion to amend the EM spec in BSCP520 is not as large as some are suggesting. An EM using data from a CMS system would still be regarded as dynamic. The difference, however, is that it would be</p>	X	60

		<p>based on switching data from the CMS control instead of a PECU array. Don't make the job bigger than it needs to be.</p> <p>What <u>will</u> need to be included is the specification of the generation of the daily download log file which the EM would be importing. The ability of the CMS system to control its apparatus is not the issue; what is of concern here is merely the ability of the CMS to accurately log all the activity.</p> <p>Meter Admin Qualification: Why? The EM software will be (re)approved, as will the CMS's generation of the log file. The approved MA will still be using approved software. No change. If a new Array manufacturer comes along, will the MA need to be re-certification?? No. The CMS system is a source of data, as is the array. I see no logical reason for this additional obstacle.</p> <p>UMSO responsibilities: The UMSO would still be nominating a dynamic EM. No change necessary.</p> <p>Allocation of MSIDs: The customer would still be allocated a single MSID for their Authority's area. Both Lailoken and LAMP can submeter. Lailoken has, for the last year, been collecting synthesised CMS "data" and calculating a submeter for it, alongside a submeter for "traditional" dynamic data. These are aggregated to the main meter which would be sent to the HHDC as normal. Consequently there is absolutely no need to generate more confusion and paperwork over additional MSIDs. The Customer would simply submit a summary which indicates "normal" or CMS control. Two "summaries" are derived there from and input into the EM for each respective submeter. Elexon representatives are more than welcome to visit ICTIS and see this system in operation as it is.</p> <p>Attachment A comments:</p> <p>1.2.1 c) not needed – see above</p> <p>1.3.2 Not wanting to repeat myself, but the EM remains Dynamic, therefore this change is not necessary</p> <p>4.5.2 c) not needed</p> <p>4.5.2.3</p> <p>A centrally-managed EM CMS system is one that is able to</p>		
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		<p>control and manage an Unmetered Supply dynamically, and which uses the detailed switching and load information recorded and reported by a Central Management System to allocate Half Hourly consumption data. The management system may be operated by the MA or the Customer, however the MA retains the overall Settlement responsibility for the quality of the data submitted by the Customer via the CMS, and is also directly responsible for the calculation of Unmetered consumption.</p> <p>The CMS is centrally managed – NOT the EM.</p> <p>Not all CMS systems may calculate HH consumption data. All that is required for settlement purposes is that it records and outputs switching times and power levels. The EM is managed <u>totally</u> by the MA. Therefore the logging part of the CMS system remains the responsibility of the MA. Other operations of the CMS are of no concern. If the customer uses a CMS which calculates HH settlement data then it may choose to seek certification as an MA using a dynamic EM. The EM, in this instance, will be approved in its own rights but will remain dynamic by definition.</p> <p>The functions of a centrally managed EM are spread across three elements: the hardware apparatus used to communicate with/control the Unmetered Supply, the management system used to control the Unmetered Supply, and the calculation system used by the MA to determine and allocate the Half Hourly consumption. Where the management and calculation systems are combined into a single application, both sets of functional requirements shall apply unless otherwise stated.</p> <p>There is no such thing as a “centrally managed EM”.</p> <p>This goes against the premise that the EM remains dynamic. Lets stop talking about CMS as something different to the existing EMs.</p> <p>The Unit Identity shall be a unique 12-digit number in which the first 8 digits are the National Street Gazetteer (NSG) code for the road and the last 4 digits the number allocated to that item.</p> <p>No. The current specification for unit ID is 12 characters (see operational information, plus 8 for NSG makes 20, unless the current file definition</p>		
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		<p>for inventory submission is changed to 4 characters for the unit ID.</p> <p>c) The management system shall record the operational switching times and load information <u>power level</u> for each unit and shall make this data available to the Meter Administrator in the form of an operational event log on at least a daily basis by (a specified time). The log shall include the Unit Identity, the exact time and date at which the load was switched, the charging code applied to the unit, and the power level changed to at that moment..</p> <p>Again, it was agreed at the last expert group meeting that the CMS system is to output POWER LEVEL as a percentage of the circuit watts specified in the charge code table. No actual load value is permitted to be used as this constitutes a meter.</p> <p>[NOTE: in this approach, a charging code would be established in the Operational Information Document for each power level required by the Customer, with the relevant charging code being reported in the operational event log and effectively overruling the base charging code provided in (b) above]</p> <p>Totally disagree, and this is NOT what was proposed at the expert group meeting. Generation of dozens of additional charge codes will only make matters worse. Its hard enough getting people to use the correct charge code and regime codes NOW, let alone adding dozens of new ones. This goes against the principal of the expert group's suggestions.</p> <p>The management system shall record the operational switching times and load information for each unit and shall make this data available to the Meter Administrator in the form of an operational event log on at least a daily basis. The log shall include the Unit Identity, the exact time and date at which the load was switched, the load applied to the unit in kWh, and the reactive power in kVARh.</p> <p>Definitely not – this would make it a meter – not allowed to happen</p>		
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	<p>without changing the metering act. Additionally, this will introduce high degrees of error by aggregating a large number of small quantities. Unless the data transfer was to a significant number decimal places, accuracy would be lost. This increase in data size would make the file transfer unrealistic.</p> <p>The management system shall record the operational switching times and load information for each unit and shall make this data available to the Meter Administrator in the form of an operational event log on at least a daily basis. The log shall include the Unit Identity, the exact time and date at which the load was switched and the percentage of the base power level specified in the charging code applied to the unit.</p> <p>EXACTLY right! "Options" "a" and "b" are not options...</p> <p>The management system shall allow the Meter Administrator to access switching times and load information on request.</p> <p>"On request" is pretty vague. The CMS system will provide a log file of this information daily, by a specified time (say 3am GMT). What is being proposed here is that the EM will need <u>direct</u> communication with the CMS system to get it to generate an output file which can take some considerable time to generate. What additional switching information would be required that isn't in the daily log file? None – this is therefore redundant.</p> <p>Filename: mmmmmmmmyyyymmdddv.log</p> <p>mmmmmmmyyyymmdddvV.log – 3 digit version number – this may just be a typo as the definition shows 3 characters.</p> <p>UUUUUUUUUUUUYYYYMMDDHHMMSSPP</p> <p>No – unit id wrong length – file does not contain enough information UUUUUUUUUUUUUUUUUUUUUUYYYYMMDDHHMMSSPPP.PPQ UUUUUUUUUUUUUUUUUUUUUU – unit ID – see above YYYYMMDDHHMMSS – timestamp</p>		
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		<p>PPP.PP – power level. This HAS to be decimal to avoid granulation. 1% of 150 watts is 1.5 watts – quite a difference when customers are using ¼ watt cells to reduce consumption and your proposal won't even be to the nearest watt.</p> <p>Q – Data quality – 0 = actual data from lighting equipment, 1 – estimate reading for non commutation with unit, etc... If the power level is regarded as alphanumeric, it could also be used to return codes instead of power levels, e.g. DAY.00 = day burner, OFF.00 = off completely. This reduces the need to a) process the file to look for two events (on and off) signifying a day burner and b) identify the difference between an off unit and a missing unit.</p> <p>The main driver for decimal power level is the fact that we now have ¼ watt cells. Accuracy to .25 watt should therefore be achievable.</p> <p>My proposal is to make it "future proof", so including it NOW will save a lot of work later</p> <p>It needs specifying that the download log filename MUST all be in lowercase, otherwise UNIX servers distinguish between THis and thIS as two separate files. Mixed case/upper case will cause serious problems.</p> <p>f) is redundant as discussed above – this is NOT a meter</p> <p>g) ditto – this is part of the EM – NOT the CMS</p> <p>h) ditto</p> <p>j) This need only be applied if estimated data (indicated by data quality flag 1) is absent from the log file. Estimated data should only be used for, say, 5 days, then this "full power" clause would come into effect.</p> <p>k) Define "calculation system." Again, referring to above, this is already covered by the EM spec.</p> <p>l) Separation again. This is EM spec – what is written here is too vague and misleading</p>		
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<p>Western Power Distribution (South West) plc</p>	<p>✓</p>	<p>Favoured option : 3</p> <p>Comments: This is a practical solution, which can be implemented with minimal delay.</p> <p>The only difference between this and current functionality is that CMS provide switching data instead of the PECU Arrays.</p> <p>We understand that manufacturers of CMS contacted have confirmed they are able to provide an addition to their software to accommodate this.</p> <p>See below for comments on this and other options</p> <p>Impact Comments: Recommended change is likely to require MA Re-certification</p> <p>Implementation Comments: Recommended change is subject to software upgrade by software provider and changes are likely to require MA Re-certification.</p> <p>Other Comments:</p> <p>General Comments:</p> <p>The proposals do not make clear the differences in functionality between the Central Management Systems (CMS), which control street lights and other unmetered equipment and the Equivalent Meter, which provides settlement data.</p> <p>The main functionality of CMS is to control the operation of unmetered equipment, provide fault diagnosis, maintenance and management information. This is distinct from the functionality required to provide data to the Equivalent Meter operated by the Meter Administrator. The MA is only concerned with the quality of data provided by CMS to enable the accurate calculation of HH data for settlements.</p> <p>The approval of CMS should therefore only concentrate on the elements which will affect the quality of data provided to the Equivalent Meter.</p> <p>In our opinion very few customers will wish to go through the MA qualification process and it will be more likely that the MA will interface with the CMS via their existing approved Equivalent Metering software</p>	<p>✓</p>	<p>?</p>
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		<p>(currently LAMP and Lailoken). To keep the functions of CMS separate to the Equivalent Meter also clarifies the process and should make the approval process simpler. The provision of a common data format from the various CMS systems to approved Equivalent Meters will facilitate market requirements and promote competition.</p> <p>The approval of existing and future CMS should focus on their ability to provide complete and accurate data in a standard correct format for the MA to process. The approval of CMS as an MA Equivalent Metering System should follow the existing qualification process to demonstrate they are able to process the data completely and provide accurate data to settlements.</p> <p>The LAMP and Lailoken systems can be developed to accommodate a calculation for data received from a CMS and would provide the most economical and quickest solution. Both systems provide sub meter functionality, which enables data to be amalgamated at MSID level, so it would not be necessary to make a separate MSID per CMS mandatory.</p> <p>DCP0001- Changes to incorporate Central Management Systems</p> <p>Meter Administrator responsibilities</p> <p>Leaving the provision of an extract to the UMSO on an ad-hoc basis could lead to data not being provided in a timely manner. It would be better to make this a defined requirement and we would recommend this to be monthly.</p> <p>Allocation of MSIDs</p> <p>Both the LAMP and Lailoken systems provide sub meter functionality, which enables data to be amalgamated at MSID level. Therefore, it would not be necessary to make a separate MSID per CMS mandatory. A separate MSID would only be required if the CMS is also approved as an Equivalent Meter and this is not likely to be common.</p> <p>Comments on Appendix 4.5 (Attachment A)</p> <p>General – For clarification we recommend that ‘Centrally managed Meters’ is changed to CMS Equivalent Meters (CMS EM).</p> <p>4.5.2.3 – Paragraph 1</p>		
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		<p>We recommend this is amended as follows:</p> <p>A CMS EM is one which uses the detailed switching and load information recorded and reported by the Central Management System to allocate Half Hourly consumption data and produce output data for Data Collectors. A CMS EM must be operated by a qualified Meter Administrator.</p> <p>Section b) It would be better to have 2 Time Switch Regime codes. One to denote load which is switched and another to denote any continuous load. We suggest 999 for switched load ad 998 for continuous load.</p> <p>Section c)</p> <p>Proposal 1 – Not favoured</p> <p>It is not clear how many dimming levels will be required and the number will also be dependent on the design of each CMS. This proposal indicates a charge code for each dimming level which means that a number of codes may be required for each unit. This would make the provision and application of codes a complicated and onerous task, increasing the risk for error.</p> <p>Proposal 2 – Not favoured</p> <p>This would appear to require a meter (recorder) to record the kWh values at each unit and the readings downloaded to the CMS and summated for the Meter Administrator.</p> <p>This raises a number of issues surrounding accuracy, approval, testing and codes of practice. Also, the meter (recorder) is likely to be several metres from the exit point, especially in the case of looped connections and we would question whether this would be acceptable.</p> <p>Proposal 3 – Recommended</p> <p>This is a practical solution, which can be implemented with minimal delay.</p> <p>The only difference between this and current functionality is that CMS provide switching data instead of PECU Arrays.</p> <p>We understand that manufacturers of CMS contacted have confirmed they are able to provide an addition to their software to accommodate</p>		
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		<p>this proposal.</p> <p>Section e)</p> <p>The full charge code should be included in the file body. The current proposal contains the percentage load and the calculation of HH data would rely on the detailed inventory. The full inventory will only be provided periodically and if there are equipment changes between inventories exceptions will occur. The provision of a full charge code in the body will reduce exceptions for the MA to investigate.</p> <p>To assist with exceptions and enable the MA to accept data it is recommended that an additional character is added to the file body to indicate whether an item is new , or has been removed etc;</p> <p>Example N = new, R = permanently removed, F = faulty</p> <p>Section j)</p> <p>Some equipment controlled by the CMS may be continuous burning. If 2 switch regimes are allocated, 998 for continuous burning and 999 for switched load, the default will be more accurate in the event of a partial or full event log failure.</p>		
E.ON UK Energy Services Limited	-	Neutral to the Change Comment: This proposal will have no direct impact on our systems & processes	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	<p>Agree Change Comment: The adoption of CMS will benefit the HH UMS market by allowing greater adoption of energy saving apparatus and better accuracy at Settlement.</p> <p>Favoured Option: 3</p> <p>Comment: Option 1 would lead to a vast array of charge codes, if every power level was assigned its own code. Therefore we disagree with option1</p> <p>As the LDSO would lose vision of the reactive power, this would be a regressive step and thus due to this lack of clarity inherent within this option we disagree with option2</p> <p>Option three seems to be the most suitable route as this would use a common charge code with varying percentages being applied to</p>	X	-

		<p>determine the usage. This option would thus give greater clarity and simplicity. We therefore agree with option3 as shown below:</p> <p>The management system shall record the operational switching times and load information for each unit and shall make this data available to the Meter Administrator in the form of an operational event log on at least a daily basis. The log shall include the Unit Identity, the exact time and date at which the load was switched and the percentage of the base power level specified in the charging code applied to the unit.</p>		
United Utilities	✓	<p>Favoured Option: 3</p> <p>Other Comments:</p> <p>1.2.1 UMSO Responsibilities.</p> <p>UMSO should retain responsibility for nominating the type of EM ie PECU Array or Flare. The supplier and the customer should nominate the type of CMS EM with agreement from the UMSO.</p> <p>4.5.2.3 Option 1</p> <p>Not sure the customer should assume the role of MA. I am not aware of any Lighting Authority who would want to go through the accreditation process to become a Meter Administrator. I think that the role of meter administrator should be kept separate from the role of customer. The MA retains the responsibility for feeding the HH consumption data into settlement.</p> <p>The time switch regime code is proposed to be set at 999. Is it proposed to have separate code to distinguish between equipment burning dusk till dawn and equipment burning continuously.</p> <p>4.5.2.3 Option 2</p> <p>This option would be the ideal solution to recording actual consumption as the CMS system effectively becomes a meter recording actual KWh at each lantern. Before this could happen the CMS system would need to conform to the current metered standards.</p>	✓	-
EDF Energy Networks (EPN) plc, EDF Energy	✓	<p>Agree Change Comment: We will need to review the areas of our business which will be affected by the proposed amendments to PSL170</p>	✓	90

Networks (LPN) plc, EDF Energy Networks (SPN) plc		and BSCP520. However, we envisage any process changes required. Favoured Option: 1 Comment: Of the two possible scenarios our preferred option is for that the MA will interface with the customer (who will run the CMS).		
Telensa	✓	<p>Agree Change Comment: The change is supported provided that the following sections of DCP0001 attachment A are retained:</p> <p>(1) section 4.5.2.3.c – at least both of the second and third alternatives are stated</p> <p>(2) section 4.5.2.3. e – at least both of the second and third alternatives (or equivalent data structures that allow use of the options in 4.5.2.3.c referred to above</p> <p>(3) section 4.5.2.3.f</p> <p>See additional comments relating to these paragraphs below</p> <p>Favoured Option: -</p> <p>Comment: Because of the varied nature of CMS solutions, more than one option will be required. See comments above and general comments, below.</p> <p>Impact Comment: System design will need to accommodate the required data structures when these are finally agreed.</p> <p>Other Comments:</p> <p>General:</p> <p>Requirements are stated in very general terms. Consideration should be given to inclusion of, or reference to, a more precise minimum set of system and testing requirements, in order to facilitate the approval and testing of systems. Where quantitative requirements can vary widely, at least the type of requirement could be listed. e.g. accuracy of reported load values could be in a wide range. The system specification could include a declared value and the testing specification would then be required to verify this declared accuracy.</p> <p>Alternative data formats:</p>	✓	TBA

		<p>The alternative event reporting methods and corresponding data formats in attachment A section 4.5.2.3.c and e appear to be alternatives. There are many potential and beneficial CMS systems that could operate in widely different ways, for which different data formats are required. Consideration should therefore be given to retaining more than one and possibly all of the options. For systems of the type that we propose, the second and third alternatives are required.</p> <p>Section 4.5.2.3.f of attachment A:</p> <p>Systems that operate according to this paragraph may or may not also provide data output according to 4.5.2.3.e The text should clarify that conformance in any one system to both of the above sections is not required (a system could provide either or both). Additionally, it is likely that any set of half hourly data generated in accordance with this section will be substantially but not wholly complete (due to possible communication losses or equipment outages). It is assumed that the MA would complete any missing data fields.</p> <p>Event timing:</p> <p>Clarification of the timing of events is needed. The event log may refer to values that are SET at the event time or to values that have been derived wholly or partly from measurement of the LAST event period.</p> <p>Units</p> <p>There are some minor inconsistencies in the use of units for kW, kWh, kVAr etc that should be reviewed.</p>		
Power Data Associates Ltd (as Meter Administrator)	✓	<p>Agree Change Comment: Subject to review of all comments received into a more comprehensive CP, which the expert group has reviewed/agreed prior to industry wide circulation.</p> <p>Favoured Option: Options are not clearly numbered, see comments below</p> <p>Impact Comments: Update to systems and operational procedures.</p> <p>Implementation Comments: To check, review, comment and update operational procedures.</p>	✓	90

		<p>Other Comments:</p> <p>I am keen to see the principle of the DCP progressed to a CP agreed by the expert group. The current drafting includes too many options and omissions for approval as written. As a member of the expert group who these comments will be referred back to, I support the change proceeding to that review. Fundamental disagreements with the current drafting:</p> <ul style="list-style-type: none"> • Clarify that the existing definition of 'Dynamic' covers both PECU Array data & CMS data • Do not need to create an additional MPAN to enable customers to use CMS solutions • Need to clearly define all the interface files: CMS-EM (events), UMSO-MA (2 x summary files), MA-UMSO (Ad hoc audit file – if needed at all!) <p>The following issues are key to progression with this DCP:</p> <ol style="list-style-type: none"> 1. I agree with all the comments provided by ICTIS in their response, in particular the concept that the only change is to effect a Dynamic EM which is provided with data either from a PECU Array and/or from a CMS controlled lighting system. This change does not create another form of EM 2. Amendment of the PSL to clarify that the MA is responsible for the whole data chain, but being more explicit on how that should be regarded in practice. 3. The discussion within the expert group suggested that the approval list would be a matrix of LAMP & CMS system A, Lailoken & CMS System A, etc. This would enable purchasers of CMS systems to be clear who had the capability of processing the data. It was also discussed that if LAMP &/or Lailoken had been proven to be able to take an interface file from an CMS system and process it successfully, there was little value in being tested again for another system producing the same structure interface file. This is not clearly mentioned in the DCP. This is no different from generating a list of 'approved' PECU Array systems, which has not happened to date as there is one predominate 		
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		<p>manufacturer and one lesser manufacturer. See comment against para 4.5</p> <p>4. Proposed change to 1.4.1.x In the expert group it was recognised that the extract required by the UMSO, was an ad-hoc requirement for audit purposes, not a regular and daily expectation. The drafting does not reflect this ad hoc nature. The volume of data will be large so the solution would differ if this becomes a regular and frequent requirement. This could be regarded as already defined in the PSL 1.6.1.1</p> <p>5. Proposed change to 1.2.1 c) & 1.3.8. Allocation of MPANs. I can not remember this being discussed in the group. I would disagree with the need to make a completely new MPAN for a CMS derived data. This will add cost for all within the industry and recognising that all these systems can be expected to commence with a relatively small load, it will add a significant barrier to entry for system providers. The customers will also have to procure energy for an extra MPAN, which will increase during the contract period, and procure for the existing MPAN that will be declining in consumption. Within the solution being developed for Lailoken (and I believe LAMP) the data would be distinct using the existing 'sub meter' capability, although combined into a single set of HH data to the HHDC. Both LAMP & Lailoken already have a capability for 'sub meters', for some customers this is used to split the inventory in half (say north/south) and use two different PECU Arrays to determine the one set of HH data into a single MPAN.</p> <p>6. Proposed change to 1.2.1 e). The existing PSL & BSCP have some strange drafting remaining from 1998. In particular there are contradictions and ambiguities between LDSO, MA and supplier roles. It is not for this DCP to resolve these anomalies, but it should not perpetuate them. The implication is that LDSO can 'agree' (therefore disagree) that a particular EM can be used in their area, this is a curious approach, when it is the BSC Panel which is "approving" EMs. The words need further revision, I agree that 'nominating' is not right. The current wording, contradicted elsewhere is rather like the BSC agreeing approved CoP5 meters, then LDSO having to agree the particular make/model that can be used in their area.</p>		
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		<p>7. Proposed change 1.3.8. The change does not define the file format, etc. between the UMSO & the MA for the revised summary inventory. SVA Data Catalogue data flow P0064 attempts to define the existing flow, although that could do with amendment, and not all UMSO provide it.</p> <p>8. proposed change to 1.7.1. The term CMS management system needs to be defined.</p> <p>9. Creation of section 3.x. I agree with the proposals</p> <p>10. Proposed paragraph 4.5. I have been told that there is a more detailed specification in existence within Elexon for the current PECU array data formats, etc. Some of this information may be relevant in clarifying the requirement for Dynamic EM.</p> <p>11. proposed change 4.5.2 c). A better approach is to regard data from CMS systems not as another form of EM, but as another source of information – more like an alternative PECU Array. So an EM could obtain data from a PECU Array and/or a CMS system.</p> <p>12. Proposed change 4.5.2 c). The proposed definition is explicit indicating the in the absence of data adopt a Passive mode. If there is equivalent PECU data available from a PECU array why can it not default first to PECU Array data?</p> <p>13. Proposed change 4.5.2.3 b). These are Switch Regimes not Time Switch Regimes</p> <p>14. Proposed change 4.5.2.3 c). Propose remove the word 'exact' – when elsewhere there are references to +/- 20 seconds</p> <p>15. Proposed change 4.5.2.3 c). Of the three options presented I would accept the third option using percentages of the rated power consumption. How the percentages are derived would be subject to approval in the approval process.</p> <p>16. Proposed change 4.5.2.3 e). The file format also needs to be produced, on request, for testing and audit purposes where the CMS & EM systems are integrated.</p> <p>17. Proposed change 4.5.2.3 e). The description needs to be enhanced to be explicit that it is a percentage of the Circuit Watts figures</p>		
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		<p>defined in the Operational Information document for that charge code.</p> <p>18. Proposed change 4.5.2.3 f). this paragraph seems confused. If the CMS & EM integrated system sends HH data to the HHDC then this should be in same file format as section 4.5.3</p> <p>19. Proposed change 4.5.2.3 g). For it to be tested the 'approved method' needs to be defined.</p> <p>20. Proposed change 4.5.2.3 k). the last 'may' should read 'should'. Although I suggest all recalculations should be subject to a configurable 'de-minimus' value in kWh.</p>		
Centrica	X	<p>Disagree Change Comment: Significant System changes would be required.</p> <p>Favoured Option: Do not agree with either proposal</p> <p>Impact Comment: Significant System changes would be required.</p> <p>Implementation Comment: This change would require a full upgrade to our systems. We are talking years here not days.</p>	✓	365+

DCP0002 - New charging code structure for Unmetered Supplies

General Comments

Organisation	Agreement (✓/X)	Comment	Impact (✓/X)	Mandays Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	<p>Agreement Comment: Agree in theory, we would not want to see vast numbers of new charging codes created to support myriad variations of dimming.</p> <p>Impact Comment: Still under assessment</p> <p>Question responses:</p> <p>Q1. How many dimming levels do you think should be allowed if solution 1 was progressed?</p> <p>A. Only one dimming level per charge code. There should be some restraint on the number of charge codes created as the potential number of variations is immense and could become unmanageable.</p> <p>Q2. Are there any further impacts on UMS participants and industry than those stated in the DCP?</p> <p>A. Yes, it will be more difficult for Suppliers to determine tariffs - hence the need to limit the number of options (see response to 1)</p> <p>Q3. Do you agree that changes are needed to the Charging Code structure? Please provide supporting evidence on the rationale for a change if you support it and identify (where possible) the costs and benefit of a change?</p> <p>A. In theory, but the need for this solution may diminish in a reasonably short period of time as technological advances obviate the need for this method of managing unmetered supplies. If this is an expensive change that has a limited life span then we wouldn't support it.</p> <p>Q4. Do you support either of the solutions set out in this DCP?</p> <p>A. Still under consideration.</p>	✓	-

Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	X	<p>Disagreement Comment: We are uncertain as to how these changes can be practically applied and in an efficient way by the MA/UMSO/CMS interface and feel that they would only cause more confusion. Certainly customers should see a unit consumption reduction if they are dimming, however we are aware that a 50% dimming reduction in lighting is only a 30% reduction in electrical consumption, therefore how can this be reflected in the customer's bill?</p> <p>Although we agree with the principles of these changes, we believe it would be beneficial for an industry workshop to be arranged, where it could be explained in more detail how these processes will actually operate and be implemented.</p> <p>As the CMS is a certified system, could that system do all of the aggregation of data and produce a KWh value that is submitted to the MA/UMSO, the UMISO/MA could follow the existing process for the rest of the inventory that utilises the existing switching regimes then aggregate their two values.</p>	-	-
CE Electric UK	✓	<p>Favoured Option: 1</p> <p>Comment: We feel that extending the length of the charge codes is a simpler way of resolving the current issue.</p> <p>We will need to obtain a cost assessment for NEDL and YEDL systems to amend the charge code fields to hold 12 characters.</p> <p>Other Comments: We agree that there should be a change to the existing charging code structure so that the energy that is being used on the network is being accounted for as accurately as possible. Also, customers that are using energy efficient equipment should be able to see the benefits of doing so.</p>	✓	
British Energy Direct Ltd	-	-	-	-
EDF Energy, Supplier Response	✓	-	X	0
Independent Consultant	✓	Agree Change Comment: I have been told that some equipment can	✓	-

		<p>be overdriven i.e. operated at more than 100% of its rating under emergency conditions. The length of each proposal should therefore be increased by one digit to accommodate this and '100' used for full load circuit watts.</p> <p>Favoured Option: 2</p> <p>Comment: Using alphanumeric for control gear will increase the number of options and also make it easy to clearly identify each manufacturer which will assist correct coding by Customers and identification by audit.</p> <p>Impact Comment: Minor</p>		
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	<p>Favoured Option : 1</p> <p>Comment: Extending the charging codes to 12 digits rather than introducing alphanumeric characters will have less impact on our systems</p> <p>Question responses:</p> <p>Q1. How many dimming levels do you think should be allowed if solution 1 was progressed?</p> <p>A: The dimming levels should be specific and banned e.g. 10.00 pm – 3.00 am, 11.00pm – 4.00 am. We believe 10 instances of these will be sufficient.</p> <p>Q2. Are there any further impacts on UMS participants and industry than those stated in the DCP?</p> <p>A: No we do not think there are any further impacts on UMS participants</p> <p>Q3. Do you agree that changes are needed to the Charging Code structure? Please provide supporting evidence on the rationale for a change if you support it and identify (where possible) the costs and benefit of a change?</p> <p>A: We do support a change to the charging code structure. It is crucial that customers are able to see the reduction in energy consumption and this is offered through accommodating dimming.</p>	✓	60

		<p>Q4. Do you support either of the solutions set out in this DCP? A: We would support solution 1 as this is the cheapest option however option 2 is also viable.</p> <p>Q5. Do you have any suggestions for alternative solutions? A: We have no alternative solutions</p>		
ICTIS	✓	<p>Favoured Option: N/A</p> <p>Comment: With the options not being numbered it makes it difficult to comment accurately without assuming numbers. Don't agree with any of the options as presented.</p> <p>Implementation Comment: Once file format on Elexon website is determined.</p> <p>Other Comments:</p> <p>Whatever happens with this, it MUST remain human readable. Therefore the arguments of random alphanumeric are redundant. Given guidance notes issued to users dimming now, and CMS proposals, there is no practical reason to include power factor in the charge code. Anyway, digits 11 and 12 do not allow for units to be over powered, and values to 10% do not follow the ethos of the accuracy being to 2%.</p> <p>This needs to be "future proof" though – we don't want to be doing this again in 5 years time.</p> <p>The first thing to clarify is that ALL data system current store the charge code as text, not as numeric, or 0100240 would appear as 100240. Consequently these should immediately be recognised as alphanumeric. Retain characters 1,2/3,4,5,6 as they are. 1,2 alphanumeric provides up to 1296 lamp types. Increase the length of the change code by 3 characters to allow 4 for gear. This provides 4 alphanumeric characters for which the first two could pertain to the manufacturer (HA = Harvard, ZO = Zodion, RT = Royce Thomson, SE = Selc etc), and the second two to a particular type of gear. Existing codes would simply be appended by "000".</p>	-	30
Western Power	✓	<p>Agree Change Comment: We are aware that in emergencies some</p>	✓	270

Distribution (South West) plc		<p>equipment may be operated at more than 100% of its rating. The length of each proposal should therefore be increased by one digit to accommodate this and 100 used for full load circuit watts.</p> <p>Favoured Option : 2</p> <p>Comment: Using alphanumeric for control gear will make it easier to identify manufacturers, it will also increase the number of options for lamp and control gear combinations</p> <p>Impact Comment: Will impact both on internal NHH and HH systems</p> <p>Implementation Comment: Changes to HH software are dependent on software provider and may be subject to MA re-qualification. Changes to NHH system also needed although these are not so complex.</p>		
E.ON UK Energy Services Limited	-	<p>Neutral to the Change Comment: This proposal will have no direct impact on our systems & processes</p>	-	-
<p>ScottishPower Energy Management Ltd.</p> <p>ScottishPower Generation Ltd.</p> <p>ScottishPower Energy Retail Ltd.</p> <p>SP Manweb plc.</p> <p>SP Transmission Ltd.</p> <p>SP Distribution Ltd.</p>	✓	<p>Agree Change Comment: The codes at present are now becoming close to obsolete as new more dynamic apparatus cannot be accurately reflected and this has the potential to lead to error in Settlement as the codes do not accurately reflect the apparatus it is being used for. Therefore the adoption of a more rigorous and future-proof coding structure will benefit the UMS sector immensely.</p> <p>Favoured Option: 1</p> <p>Comment: Option1 will result in less disruption due to the continuation of the same numbering convention as currently happens. The number of possible variations of control gear will also result in it being future-proof</p> <p>Impact Comment: Our UMS system will require to have changes made for it to be able to accept the new longer digit codes if the CP is agreed to by industry.</p>	✓	60
United Utilities	✓	<p>Agree Change Comment: The current charge code structure has been in place for many years and hasn't changed. The industry need to adapt the charge code structure to accommodate the new technology within street lighting.</p>	✓	?

		<p>Favoured Option: 1</p> <p>Comment: Option 1 allows the current 7 digit charge code to be extended to 12 digits. Essentially the format for code structure remains the same but allows for a greater number of control gear combinations.</p> <p>Individual control gear manufacturers can also be identified numerically. It also caters for any number of dimming levels from 100% to 0, thus allowing the customer to benefit from reduced power levels at certain times of the night.</p> <p>Option 1 also maintains the all numeric format with which both the electricity industry and lighting industry are familiar. Option 1 will also be easier to install in Lamp and Lailoken.</p> <p>Impact Comment: The current Lamp system would need to be updated to accept a change to the charge code structure. This impact could be minimal if all the codes were updated by St Clements Services and sent out in a file to the Lamp users to be downloaded into Lamp.</p> <p>The impact could be more severe if the individual Lamp users have to update the codes manually. Clarification is needed as to how this process will take place.</p> <p>Implementation Comment: This is not known at the moment.</p>		
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	<p>Question Responses:</p> <p>Q1. How many dimming levels do you think should be allowed if solution 1 was progressed?</p> <p>A: Our opinion is that in the region of five dimming levels would be sensible. We would like to raise the point that some element of load research will be required to establish the % of normal circuit Watts versus the dimming level relationship. There is the risk the greater the number of dimming levels the more onerous this will be.</p> <p>Q2. Are there any further impacts on UMS participants and industry than those stated in the DCP?</p> <p>A: No.</p> <p>Q3. Do you agree that changes are needed to the Charging Code</p>	✓	180

		<p>structure? Please provide supporting evidence on the rationale for a change if you support it and identify (where possible) the costs and benefit of a change?</p> <p>A: The existing code structure is being stretched in terms of the number of new gear types being requested at UMSUG. However, we would question the value of accommodating even more gear types (with very slightly different circuit wattages) when the majority of customers cannot keep track of the current gear type variants employed. The different circuit wattages resulting are also a marketing tool for the equipment manufacturers and we would question to what extent we need to support this.</p> <p>Q4. Do you support either of the solutions set out in this DCP?</p> <p>A: Our view is that the case for a longer more accurate charge code is getting stronger. We feel both of the two, quite similar, options are worth investigating. We would query whether the alpha-numeric option would be easier for customer to understand. There will be IT systems costs for us to support as well as time spend educating our 4,000 customers.</p> <p>Q5. Do you have any suggestions for alternative solutions?</p> <p>A: No.</p> <p>Favoured Option: Please see our response to question 4.</p> <p>Impact Comment: Changes to our processes will be required</p> <p>Implementation Comment: There will be an impacts on our systems</p>		
Power Data Associates Ltd (as Meter Administrator)	✓	<p>Agree Change Comment: Subject to review of all comments received into a more comprehensive CP, which the expert group has reviewed/agreed prior to industry wide circulation.</p> <p>Impact Comments: Update to systems and operational procedures</p> <p>Implementation Comments: To check, review, comment and update operational procedures.</p> <p>Other Comments:</p> <p>The impact upon customers has not been adequately sought. There are</p>	✓	90

		<p>several hundred larger authorities with Inventory systems, there are some inventory system manufacturers who should be made aware of the proposed changes. This proposal needs to be circulated to a wider audience.</p> <p>The existing structure is not consistent across all unmetered equipment, note 3 on page 3 highlights the format used by other equipment. This equipment has exactly the same business drivers which are not addressed/resolved by this proposal.</p> <p>It should be noted that the existing implied 'format' has already been abused making the direct relation between lamp/gear/wattage as inconsistent. Also, with increasing system interpretation of the codes the use of manual review is diminishing.</p> <p>Using 'manufacturer' codes is not good practice as they change over time, one company changes its name, another gets taken over, etc. With equipment having a 20+ year lifetime the maintenance of the tables becomes an administrative nightmare. (just consider the name changes of meter manufacturers over 17 years)</p> <p>Dimming of equipment can (and should already) be being applied in the NHH market using the current format – subject to the abilities of the UMSO. This DCP does not 'improve' the situation for NHH traded equipment.</p> <p>There is a concern that we are trying to be too clever by identifying specific manufacturers of equipment. When a lamp/gear fails (say a SELC gear) it will be replaced with similar equipment which may be a different manufacturer (latest supplier of gear to authority is Harvard), with this level of detail the inventory needs to be updated. Some authorities may find this level of accuracy too great a challenge, leading to challenges at physical audits.</p> <p>I disagree with the comment that the alternatives of amending the existing code from 7 'digits' to 7 'alpha numeric'. Many organisations commented in the expert group that their systems already treated the code as alpha numeric. This would then become a least change solution. This should have been considered as an option in this DCP.</p> <p>My proposal would be that the code should be the same length as now,</p>		
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		<p>but regarded as alpha numeric:</p> <p>Char 1, 2 To differentiate lamp type [gives thousands of combinations]</p> <p>Digit 3,4,5,6 Nominal equipment rating in watts (as now)</p> <p>Char 7 To recognise different gear types and dimming levels (providing some 30+ variants)</p> <p>Existing users would not be impacted. In time, where new variants are agreed then the last character would differentiate between the manufacturer and dimming level. The expectation of using all these codes for any particular lamp type/size are thought to be remote. But if that did occur, then the two initial digits could be used to create another set of combinations.</p>		
Centrica	X	<p>Disagree Change Comment: Significant System changes would be required to implement new charging structures that would not have break even payback.</p> <p>Favoured Option: Do not agree with either proposal</p> <p>Impact Comment: Because the charges</p> <p>Implementation Comment: This change would require a full upgrade to our systems. We are talking years here not days.</p>	✓	365+

DCP0003 - Clarification of Grid Supply Point (GSP) and GSP Group Aggregation Rules

General Comments

Organisation	Agreement (✓/X)	Comment	Impact (✓/X)	Mandays Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	X	-
CE Electric UK	✓	-	X	-
CE ELECTRIC UK (NEDL / YEDL)	✓	-	X	-
British Energy Direct Ltd	-	Neutral to Change Comment: No effect on current settlement.	-	-
EDF Energy, Supplier Response	✓	-	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy	✓	Agree Change Comment: Our opinion is that DCP003 successfully adds clarity (in BSCP75) to the rules for GSP and GSP Group Aggregation in the BSC. As such we agree that it should progress as a CP.	X	-

Power				
ICTIS	-	As a software developer, there is no impact of this decision on the method of operation here, or services offered. Consequently ICTIS has no active part in this DCP	-	-
E.ON UK Energy Services Limited	-	Neutral to the Change Comment: This proposal will have no direct impact on our systems & processes	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Following a review of DCP0003 and redline changes to BSCP75 everything would appear to be in order.	X	0
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	Agree Change Comment: Minor changes to our business processes will be required	✓	90
Centrica	-	-	-	-
United Utilities (Late response)	X	Impact Comments: This proposal will require changes to be made to our GTDVS system which we currently use to validate Group Take and individual GSP and BMU meter period data. This cost has been quoted at £8,840. Implementation Notification Comments: For software changes to be implemented and tested Other Comments: This proposal will result in additional cost being incurred by United Utilities. This issue currently has no materiality for Settlement accuracy and is simply burdening UU with unnecessary additional costs.	✓	20

CP1188 - Improvements to the use of the Half Hourly Aggregation Exception Report (D0235)

General Comments

Organisation	Agreement (✓/X)	Comment	Impact (✓/X)	Mandays Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
IMServ Europe	X	Disagree Change Comment: Our initial question regarding this proposal is with regard to cost justification. Whilst we acknowledge that the scenario described does result in "invalid" D0235 exceptions, the volume of such has not been quantified nor has the actual business/settlement impact. Such exceptions cannot be cleared and as such can "cloud the picture" however, it is essential to quantify this issue in order to consider the benefit of change. Even if the volume is significant, we need to understand the implication of "unresolved" D0235s and whether this is a situation which is perhaps "acceptable" to all involved parties. It should be noted that there is at least one other instance where a D0235 exception will continue to be reported at every Run throughout the Settlement Window, despite the fact that corrective	✓	90

		<p>action has been taken: consideration should perhaps therefore be given to “what is acceptable” in general rather than solely focussing on this one specific instance.</p> <p>This specific proposal would involve changes to our D0040 and Exception Reporting process with associated development and deployment costs but more significantly would also require extensive testing due to the criticality to Settlements of the flows in question.</p> <p>There is already a further risk associated with the current process in terms of impact to Settlements, which has not been identified in the CP. Currently a status of “de-energised” is attributed to the date on which de-energisation actually occurs, irrespective of the time of day of the change. In the instance that the meter was recording values up until this time, and the DC is unable to collect data for the preceding time periods, automated estimation techniques may incorrectly populate the energised tps with zeros, rather than values in line with preceding consumption, as the site is considered to be de-energised. In addition, in the event that a DC fails to submit retrieved data for the energised periods to the Data Aggregator, there is potential that this may not be submitted to Settlements as, both Parties view the site as de-energised and therefore are not expecting/chasing data.</p> <p>We would therefore suggest that consideration be given to addressing the root cause of this issue, rather than simply attempting to resolve one of the effects.</p> <p>The question should be considered as to what status would be attributed to a day, if certain time periods during the day are de-energised. Current practice would treat this as “energised”. The same practice could therefore be applied to dates on which the status changes part way through the day to de-energised, i.e. if any period is energised, treat the whole day as “energised”. Consistency of information across the Industry could be achieved (as recommended in the CP) by a change in practice to the population of Data Item J0014 by the MOP/LDSO in the instance of “de-energisation”.</p> <p>Such a change falls outside the remit of BSC Governance and may perhaps have implications to other parties of which we are unaware, however we recommend that this should be explored as an option as, it</p>		
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		brings increased benefit and reduction in Agent' implementation costs, i.e. a change to manual process only as opposed to automated systems.		
British Energy Direct Ltd	✓	<p>Impact Comment: BEDL do not envisage any significant changes to systems or processes</p> <p>Implementation Comment: Notice to implement minor internal process & documentation changes.</p> <p>Other Comments: Could give a slight increase in possibility of erroneous meter data after de-energisation on de-energisation date being overlooked?</p>	✓	30
EDF Energy, Supplier Response	✓	Agree Change Comment: Enables Suppliers to focus on valid D0235 exceptions	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	Agree Change Comment: We fully support this change	X	60
E.ON UK Energy Services Limited	✓	<p>Agree Change Comment: This change would significantly reduce the number of irresolvable D0235s</p> <p>Impact Comment: Changes would be required to our HHDA functionality</p>	✓	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	<p>Agree Change Comment: SP supports this change as it will eradicate the creation of unnecessary D0235 exception reports which are not possible to resolve.</p> <p>Impact Comment: SP will have to amend HHDA in order that a D0235 is not created where a non-zero consumption value is passed from the HHDC to the HHDA.</p>	✓	188
SSIL HHDC/HHDA	✓	Agree Change Comment: A minor change that will reduce a small number of D0235s	✓	60

		Impact Comment: Minor coding change		
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	-	-	X	-
Centrica	✓	Agree Change Comment: Centrica support this change as it should reduce the volume of D0235 999 exceptions received. Impact Comment: Process changes	✓	90