

**CPC00662 – Impact Assessment Responses for DCP0044, CP1267 v2.0, CP1295, CP1296, CP1297, CP1298, CP1299 and CP1300**

**DCP0044 – Changes to Long Term Vacant (LTV) Site process where a reading is obtained via a warrant**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
E.ON	Supplier	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	-
G4S AccuRead	NHHDC, NNHDA, MOP	Yes	91
British Energy	Supplier	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	No	90
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	No	-
NPower Limited	Supplier, Supplier Agents	No	-
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	No	90
The Electricity Network Company	Distributor	Neutral	-
E.ON UK Energy Services Limited	NHHDC/DA	Neutral	180
CE Electric UK	LDSO, UMSO	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
E.ON	Yes	<p><b>Which solution do you prefer?</b> Solution 1</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier / DC</p> <p><b>Impact :</b> system</p>	Yes
EDF Energy	Yes	<p><b>Comments:</b> But only under solution 2, solution 1 directly contravenes solution implemented under modification P196. Just because a warrant has been received does not mean that a site is vacant and cannot be used as a method of proof of a vacant site. Also given a reading has now been received correct consumption can be entered into settlements resolving issues around EAC and AA data and main issue is in this process is to ensure settlement accuracy.</p> <p><b>Which solution do you prefer?</b> Solution 2</p> <p>Because solution 1 redefines this process and is based on a false premise that a warrant has something to do with a site being vacant.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> No</p>	No
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<p><b>Which solution do you prefer?</b> Solution 2</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> No</p> <p><b>Capacity in which Organisation is impacted</b> LDSO</p> <p><b>Impact on Organisation</b> None</p>	No
ScottishPower Energy Management Ltd.	Yes	<p><b>Do you agree with the intention of this DCP?:</b> Yes</p> <p><b>Which solution do you prefer?</b> Option 2</p> <p><b>Why is this?</b> This will ensure the most accurate data possible is used in Settlements following a warrant read. Option 1 could possibly undermine the P196 LTV process and would be more difficult to manage than Option 2 in practice, as checking for a warrant read would be a manual process. Option 2 remains within the current P196 criteria (and principles) of when to treat a site as LTV based on flows received and will improve the accuracy of Settlement from the start of the LTV period, rather than using a deemed</p>	No

		reading. <b>Impact on Organisation's Systems and/or Processes?</b> No <b>Comments:</b> Scottish Power's current LTV flow process doesn't track 'the reason' for the production of a meter reading, so if a meter reading was obtained because of a warrant, this wouldn't be recognised.	
AccuRead	Yes	<b>Which solution do you prefer?</b> Solution 2 <b>Why is this?</b> Solution one would not be a practical method to maintain unless the entire LTV process was re-thought from a NHHDC perspective. Furthermore, to implement either change would require a way of identifying Warrant reads as part of an automated process which could be easily linked to BSC reading processing. As a result, either a new SVCC code would need to be introduced or more radically (And far less practical) a new read type. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted:</b> NHHDC <b>Impact on Organisation :</b> System Processes	Yes
British Energy	Yes	<b>Which solution do you prefer?</b> Solution 1	No
TMA Data Management Ltd	No	<b>Comments:</b> The DCP mention the need for automation but how would the NHHDC be aware that the read was obtained by a warrant? None of the read types apply to that situation. We support the change on the condition that a new read type is added. <b>Which solution do you prefer?</b> Solution 1 <b>Why is this?</b> It makes sense to keep the site as a LTV site, removing it from the LTV process to put it back following more D0004 only adds complexity and does not fully resolve the issue. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted</b> NHHDC Impact on Organisation: system and process changes <b>Implementation:</b> 90 <b>Costs:</b> It is estimated that the change would cost around £5K	Yes

Scottish and Southern Energy	No	<p><b>Comments:</b> When an entry is obtained via a warrant, the meter at the site could be changed/de-energised; the warrant is not necessarily applied for just a read.</p> <p><b>Which solution do you prefer?</b> Solution 2</p> <p><b>Why is this?</b> Because the meter at the site could be changed or de-energised at the time of entry via a warrant.</p>	-
NPower Limited	No	<p><b>Which solution do you prefer?</b> Neither</p> <p><b>Why is this?</b> No Business Justification for either option has been presented either within this DCP or at the issue 0004 review group.</p> <p>We believe the number of incidents where a warrant is obtained for access to a long term vacant site is very small.</p> <p>If this change was agreed there would be impacts on both Suppliers and Suppliers Agents resulting in system changes. We believe the cost of these changes cannot be justified by the volume of this issue.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier, Supplier Agents</p> <p><b>Impact on Organisation:</b> System and Processes.</p>	180
Siemens Metering Services	No	<p><b>Do you agree with the intention of this DCP?</b> No</p> <p><b>Which solution do you prefer?</b> Solution 2</p> <p><b>Why is this?</b> Our preference would be to use the last valid read rather than the deemed read. However, this can be achieved by the Supplier sending the NHHDC the read on a D0010, using existing functionality, rather than requiring any system changes.</p> <p><b>Capacity in which Organisation is impacted :</b> NHHDC</p> <p><b>Impact on Organisation:</b> System and process changes</p>	Yes
E.ON UK Energy Services Limited	Neutral	<p><b>Comments:</b> We understand the reasoning behind this process however we would require more information in order to form a clear understanding of the impact of the proposal.</p> <p><b>Which solution do you prefer?</b> Solution 1/ Solution 2</p> <p><b>Why is this?</b> Solution 1, new read type required to identify a warrant reading. Also</p>	Yes

		<p>require clarification of what we would do with the reading (process into settlements potentially causing a non-zero AA, or do we leave it on an existing EAC.</p> <p>Solution 2, still require a new read type, this could mean that a site could be settling on a non-zero EAC for a period of seven months.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted</b> NHHDC</p> <p><b>Impact on Organisation:</b> System changes</p> <p><b>Comments:</b> Training also taken into consideration</p> <p>Changes will be required to NHHDC software, also changes to EAC/AA request files.</p>	
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## CP1267 v2.0 – Registration of UMSOs and MAs in SMRS

### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
E.ON	Supplier	Yes	-
Power Data Association	Meter Administrator	Yes	-
British Energy	Supplier	Yes	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	365
The Electricity Network Company	Distributor	No	-
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	180
Electricity North West Limited	LDSO	No	600
EDF Energy	Supplier, NHH Agent and HH MOP	No	730
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	No	8 Months
CE Electric UK	LDSO, UMSO	No	6 months
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	180
Npower	Supplier	No	180
Gemserv	MRASCo Ltd	Neutral	Various (see comments)
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Neutral	
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Neutral	0
E.ON UK Energy Services Limited	NHHDC/DA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
E.ON	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted :</b> supplier</p> <p><b>Impact on Organisation:</b> systems</p>	Yes
Power Data Associates Ltd	Yes	<p>As an MA we suffer with the current arrangements. It had been possible to update MPAS with the MA (and UMSO) until some changes to MPAS last year removed this ability. The changes were not triggered by any BSC change, but are understood to be consequential to other changes to the MPAS system.</p> <p>As the current MA for a customer which changed Supplier this week, the new supplier sent appointed details to the MA registered in MPAS – because of this issue they sent to flow to the DNO (who is no longer acting as MA) – thankfully the DNO identified the error and responded – by email to the Supplier and to ourselves as the contracted MA. In this case the Supplier also changed the HHDC, if we had not been informed then we would have continued to send HH data to the 'old' HHDC which would not have entered into settlements. Resolving this situation involved additional work for all parties, and may yet cause the HHDC to reject the HH data if the supplier has not correctly updated the HHDC.</p> <p>For another customer the UMSO initially refused to send us the Summary Inventory as we were not the 'appointed MA in MPAS' – this was resolved through email and phone calls – again involving extra manual effort and potential for settlements to be in error.</p> <p>It is therefore important that the Suppliers should <i>once again</i> have the ability to update MPAS with the correct MA. Although it does not affect ourselves as MA it is understood that the CP may fail because of the mandated change to the D0055, which will probably have a significant impact on Suppliers. Prior to the CP being formally raised we highlighted this concern to ELEXON. The rational was primarily for new connections, yet if the field in the D0055 was blank then it would seem reasonable, in the absence of any definitive information, for the MPAS system to validate on the assumption of a NHH MPAN.</p> <p>The changes to BSCP520 approved this week (for Nov09 implementation) remove the optionality of <i>changing</i> an MPAN from NHH to HH (or vice versa). This reflects the practical experience that UMSOs tend to issue a new [single] MPAN for HH trading and</p>	No

		<p>then de-energise (followed by logical disconnection) of the [multiple] NHH MPANs.</p> <p>The proposed changes to BSCP501 and 520 will need review as result of the agreed changes to BSCP520.</p> <p>The CP indicates "... The current industry practice (though not a strict requirement)..." to nominate the MA into MOA field – the MA Expert Group viewed that this was a requirement (and until recently common practice) and wanted to make this requirement more explicit, yet could not make that recommendation due to the this CP.</p> <p>The original CP – which resolved the issue – had a cost of £10k to implement, although a significant value, however putting that into context our two largest HH UMS customers <b><i>each have an energy bill of £10k per day</i></b> so any settlement error will have a noticeable impact, particularly for Distributors seeking to reduce their losses.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> No</p> <p><b>Capacity in which Organisation is impacted:</b> Meter Administrator</p> <p><b>Impact on Organisation:</b> Reduced manual activities to correct problems affecting settlement and customer errors.</p>	
<p>EDF Energy Networks (EPN,LPN,SPN)</p> <p>EDF Energy (IDNO) Ltd</p>	Yes	<p><b>Comments</b> We are aware that this change will require considerable IT system changes. However we agree that the change will improve overall Industry data quality.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> UMSO/SMRS</p> <p><b>Impact on Organisation :</b> Systems and Processes</p> <p><b>Implementation:</b> A major change will be required to the software used by SMRS. Process changes also required for SMRS and UMSO</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Additional costs due to the need to apply the software changes outside the normal programme.</p>	Yes
The Electricity Network Company	No	<p>This appears to be a dis-proportionately costly solution to a relatively minor issue. Changes to the BSCP documentation to reflect the situation is a more pragmatic solution.</p> <p>The proposal seems to disregard the issues raised in version 1.0 comments. Introducing the measurement class as mandatory will have impact on validation rules and require both SMRS and supplier system changes. It will affect the whole registration process not just</p>	Yes



		<p>UMS registrations.</p> <p>The system impact is very large and would affect: tables / screens/ validation/ processing/ reports / outputs</p> <p><b>Impact:</b> Yes</p> <p><b>Capacity</b> in which Organisation is impacted : Distributor</p> <p><b>Impact on Organisation:</b> System</p>	
Western Power Distribution	No	<p><b>Comments</b> We think this change is unnecessary and will result in costs being incurred for little or no benefit to the industry. The problem is with the BSCPs and not with the SMRA system or the D0055.</p> <p>The proposal suggests populating the MOA data item on SMRS with either the MPID of the UMSO (for NHH) or the MPID of the MA (for HH). It also suggests changing the rules for how to populate the D0055.</p> <p>Our view is that the SMRS is not designed to hold details of an UMSO or MA. It does not need to hold this information for settlement purposes and it does not need to hold it for change of supply purposes.</p> <p>Therefore, for unmetered MPANs, the BSCPs should be changed to permit the supplier to populate the MOA data item with any valid MOA MPID. (It doesn't matter which MOA MPID they use. The only reason it needs to be populated is because SMRS requires something to be in the MOA data item).</p> <p>For NHH unmetered supplies it is pointless holding the MPID of the UMSO on the SMRS system because the UMSO is always the LDSO of the network to which the MPAN is connected. If any market participant needs to know who the UMSO is then all they need to know is the MPAN as they can derive the UMSO from this.</p> <p>We note that the change proposal suggests validating the UMSO MPID used against MDD. In reality the validation should be done against the MPAN's LDSO MPID as the UMSO MPID must always be the same. In its current form the proposed validation will not ensure the data item is correct.</p> <p>For HH umetered supplies the CP gives two reasons why holding the MA ID on SMRS</p>	Yes

		<p>would be useful.</p> <p>1 the UMSO would not be able to check the identity of the HHMA in SMRS and so may not be willing to send Settlement data (e.g. inventory details) to the HHMA until their identity has been confirmed via the Supplier; and</p> <p>2 the Supplier would also not be able to check the identity of the HHMA in SMRS. This is likely to be an issue when a Change of Supplier has occurred. As there is no database, the new Supplier will have to find the identity of the HHMA from another source.</p> <p>For the first point, the UMSO will usually have regular contact with the Customer as they are obliged to send regular inventory updates. Therefore UMSO will normally be able to find out the identity of the MA relatively easily. In any case it is fairly simple to confirm this with the Supplier.</p> <p>For the second point, we do not agree it is "likely to be an issue" on a Change of Supplier because of the low incidence of CoS on relatively few HH UMS MPANs.</p> <p>If there are not many MPANS which can go through CoS then it is unlikely that any problem with the process will be significant. Does Elexon have any evidence of problems being experienced by Suppliers or UMSOs being unable to identify the MA on a change of supply? If so, what is the cost of the problem in relation to the cost of the proposed change? (WPD has just 33 HH UMS MPANS on our MPAS systems, only 2 of which changed supplier within the last year, so any costs to resolve problems would be negligible).</p> <p>Regarding difficulties for Suppliers, HH UMS portfolios are generally managed by customers who are fully aware of the electricity UMS market arrangements. There is plenty of opportunity for a Supplier to find out who the MA is when they are trying to win these customers. The scenario is totally different to a domestic change of supply where the Supplier is dependant on MPAS to find out who the current Supplier and Agents are.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> SMRA</p>	
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Electricity North West Limited	No	<p><b>Comments:</b> The changes required for this CP are of no benefit to LDSOs, yet it is expected that LDSOs will be required to pay the costs as it is changes to the SMRS system. In our GSP (_G) the UMS = approximately 800 Mpan (approx. 200 Mpan are HH) out of a database of 2.3 million Mpan, at the moment in our GSP the MOA has not been end dated and there are currently no plans to do so.</p> <p>To implement this CP would mean a large change to the validation of the registration process and I expect this would impact Suppliers registration systems as they will need to implement the validation for the D0055 for all Mpan before it is sent, which is of no benefit on the majority of the Mpan they register against.</p> <p>As it is stated in CP1267 for HH UMS they need to nominate the Meter Administrator, although 'this is not a strict requirement', surely it would be easier to address the inaccuracies of the BSCP520 and ensure there is a robust process in place rather than impact LDSOs and Suppliers in amending the current robust registration process and introducing complexities for a minimal number of Mpan.</p> <p><b>Capacity in which Organisation is impacted:</b> SMRA/Distributor</p> <p><b>Impact on Organisation:</b> Impact on SMRS and Distribution systems and processes.</p> <p><b>How much Implementation Notification is required from receipt of approved redline text changes?</b> 600 Calendar days</p> <p><b>Comments:</b> With all the other major industry changes in the pipeline (Structure of Charges for LDSOs) with delivery dates of 01.04.2010; this issue could only be considered after 01.04.2010.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Yes. ENW Ltd could not meet the current timescales due to other major industry changes.</p>	Yes

EDF Energy	No	<p><b>Comments:</b> In making this change to assist in resolving what is a minor issue this change will impact on every single registration that we make. This is really badly thought out and will cause significant problems for metered sites, particularly HH. If HH metering is fitted would we need to determine if this is measurement class C or E and if we get this wrong would registration be rejected, if not then why do we need to send measurement class for a metered site. There is absolutely no need to make measurement class mandatory on D0055 and we would request that Elexon stops suggesting changes in UMS market that have significant impact on processes for metered MPANs, as was previously done with D0052. We would also note that it should not be down to SMRS to validate if a Supplier has set-up correct agents this should be down to the Supplier. If UMS group really believe that a change is required in this area then we would suggest a more appropriate method that has no impact on metered registrations is only one that can be taken forward. Instead of making this change that impacts on every single registration all that should be added is a notes section in DTC annex C on how a D0055 needs to be populated when registering a MPAN in measurement classes B and D, this could then be referred to from DTC annex B under flow notes. If group still believe that SMRS validation is required this could also be added but it must have no impact on metered MPANs. In fact given that SMRS already holds details of measurement class it can use that information to do this validation and does not require this to be on a D0055.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted :</b> Supplier</p> <p><b>Impact on Organisation:</b> Significant changes to automated registration processes, which can be mitigated by an alternate way forward for UMS registrations which are carried out by us manually.</p> <p><b>Implementation:</b> No. of Calendar Days 730</p> <p><b>Comments:</b> We have no time to make changes that have no benefit to us for at least 2 years. This is due to resources being used on new system developments.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Yes – it would prevent us from registering any new MPANs and we would treat this as Elexon preventing us from competing in the market on a fair and equitable manner.</p>	Yes
Scottish and Southern Energy	No	<p><b>Comments:</b> We agree with the principle of this proposal, however, we would like to see the cost and impact implications on the complex changes required for this solution to the SMRS software. We also need to understand what the data cleansing exercise entails and</p>	Yes

		its cost implications. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Impact on Organisation:</b> Cost and changes to processes and systems.	
CE Electric UK	No	<b>Comments:</b> We reject this change proposal as we feel the benefits are outweighed by the financial implications, we also feel the additional validation being proposed on measurement class is outweighed by the cost implications. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted:</b> LDSO <b>Comments:</b> If implemented we would require 6 months to incorporate system changes. <b>Would implementation in the proposed Release have an adverse impact?</b> No adverse changes identified but please refer to comments above.	Yes
ScottishPower	No	This new version of CP1267 seems to offer at least three solutions to the problem posed by the SWAE issue. However, the actual CP response form does not seem to reflect this. ScottishPower can therefore not support the CP if the proposed change is the Elexon recommended solution. Making a change to the D0055 seems excessive for a problem which most of the sector have viewed as insignificant via their responses in version 1 of this CP. Though there is an issue which requires resolution it would seem that such a change would incur significant costs which cannot be justified in terms of the benefit that would accrue to both ScottishPower and the wider sector. ScottishPower, though supportive of the original solution in version 1, would support a simpler resolution to the issue by use of a dummy code to populate the MOA field. However, this CP in its current form does not seem to offer a clear and precise resolution to the issue as it does not address the main issue for rejection of version 1 and has in fact offered a solution with additional costs to the original. <b>Impact on Organisation's Systems and/or Processes?:</b> Yes <b>Capacity in which Organisation is impacted:</b> UMSO, MOA, Supplier <b>Impact on Organisation :</b> The recommended solution proposed by Elexon would result in system changes to a number of systems and would require changes to internal processes.	Yes

		<p><b>Would implementation in the proposed Release have an adverse impact? No</b></p> <p><b>Other Comments:</b></p> <p>While fully supporting the need for Suppliers to register the MA, ScottishPower are concerned at the way in which this CP has been further developed, with the suggestion of added complexity and therefore additional expense to resolve an extremely unique situation affecting a negligible quantity of records.</p>	
Npower	No	<p><b>Comment:</b> NPower does not agree with mandating the measurement class within the D0055.</p> <p>Currently suppliers wait for confirmation of agent appointments and receipt of meter technical details, which both arrive after the registration process (D0055), before updating (D0205) MPAS with confirmed agents and accurate metering details (SSC, energisation status, etc). There can be no assumption that details provided to SMRS will be accurate prior to receipt of the agent confirmations and the meter technical details.</p> <p>Inaccurate date leads to default values or no data (HH or NHH) and to data cleansing issues (D0095's etc).</p> <p>This solution will have system impacts and affect all MPANS. As the problem is only with a small subset of our portfolio we feel this seems an unnecessary big impact.</p> <p>Whilst we agree there is an issue with the current process we disagree that the best way to approach it is to cause an impact on all metered MPANs as well.</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier</p> <p><b>Impact on Organisation:</b> System Impact</p>	Yes
Gemserv	Neutral	<p><b>Capacity in which Organisation is impacted:</b> MRA Service Company Ltd (MRASCo)</p> <p><b>Impact on Organisation:</b> This change would require a DTC change in the status of data item J0082 'Measurement Class ID' data item from 'Optional' to 'Mandatory' (D0055).</p> <p><b>No. of Calendar Days</b> Various (see Comments)</p> <p><b>Comments</b> Changes to DTC - Implementation timescales:</p> <ul style="list-style-type: none"> <li>• From point CP is submitted to MDB decision – approximately 1 month</li> <li>• From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and</li> </ul>	Yes

		<p>November).</p> <p>If it is a system change then from the date of approval, industry would need 6 months to update their systems accordingly. A procedural change would take approximately 3 months.</p> <p><b>Would implementation in the proposed Release have an adverse impact:</b> It would depend on how long it would take for the new Data Flow to be created.</p>	
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**CP1295 – Process for distribution of MDD Updates not included in D0269/D0270 flows**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	90
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	30
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	30
NPower Limited	Supplier, Supplier Agents	Yes	-
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	90
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	-
Stark	HHDC/HHDA/NHHDC/NHHDA	Yes	30
G4S AccuRead	NHHDC, NNHDA, MOP	Yes	91
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	No	30
CE Electric UK	LDSO, UMSO	No	6 Months
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Neutral	-
British Energy	Supplier	Neutral	-



Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
E.ON	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier / DC DA</p> <p><b>Impact on Organisation :</b> Systems / processes</p>	Yes
TMA Data Management Ltd	Yes	<p><b>Capacity in which Organisation is impacted:</b> NHHDA and NHHDC</p> <p><b>Impact on Organisation:</b> Process plus script testing</p> <p><b>Implementation :</b> 90 Days</p> <p><b>Costs:</b> The cost is estimated to be around £1K</p>	Yes
EDF Energy	Yes	<p><b>Comments:</b> Ensures MDD information should be up to date for all parties.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> NHHDA and NHHDC</p> <p><b>Impact on Organisation:</b> Process for dealing with loading data into NHHDA and EAC/AA calculator via new scripts.</p> <p><b>Implementation No. of Calendar Days</b> 30</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b> Will any checks be made to STAG mailing list is up to date so that details are not missed by any party?</p>	Yes
Imserv	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> NHHDC/DA</p> <p><b>Impact on Organisation :</b> Yes</p> <p><b>Implementation No. of Calendar Days</b> 90</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p>	Yes

E.ON UK Energy Services Limited	Yes	<p><b>Capacity in which Organisation is impacted:</b> NHHDC and NHHDA</p> <p><b>Impact on Organisation:</b> Process changes and training (centrally provided software – testing required)</p> <p><b>How much Implementation Notification is required from receipt of approved redline text changes?</b></p> <p>No. of Calendar Days 30</p> <p><b>Comments:</b> Training of new processes</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b></p> <p>Update to BCSP, suggestion to make this a mandatory requirement to remove any possible confusions</p>	Yes
Siemens Metering Services	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted;</b> NHHDC/ DA</p> <p><b>Impact on Organisation:</b> Process impact</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No adverse impact</p>	Yes
ScottishPower	Yes	<p>While Scottish Power agree with the change, it would be helpful if Elexon could publish the tables on their website alongside the other MDD Tables. In addition, Elexon propose using STAG to issue the SQL scripts, again this an acceptable solution, although this still raises the question as to whether STAG have an appropriate mailing list, and do they suffer from the same difficulties as Elexon in contacting the appropriate people.</p> <p>Scottish Power would also suggest that due to any potential impacts on Settlement by using incorrect data, is it possible to bring forward this change for implementation in the November 2009 release rather than February 2010.</p>	No
Stark Software International Ltd	Yes	<p><b>Comments:</b> Current process not robust. This should improve things.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> NHHDC/NHHDA</p> <p><b>Impact on Organisation:</b> Procedural only</p>	Yes

		<b>Would implementation in the proposed Release have an adverse impact? No</b>	
AccuRead	Yes	<b>Capacity in which Organisation is impacted:</b> NHHDC / NHHDA <b>Impact on Organisation :</b> System Processes	Yes
Scottish and Southern Energy	No	<b>Comments</b> We agree that to operate efficiently all participants use correct data and that this is managed in a secure and auditable manner. However, we cannot see the materiality or cost justification of this proposal: <ul style="list-style-type: none"> <li>• The values have historically not been changed. The last change was in Apr 08 and there may not be a change at the new ongoing annual review.</li> <li>• The NHHDA's and NHHDC's may or may not use the new process. In which case, Elexon will not have the confirmations, it requires. Thus not addressing the issue.</li> <li>• 5 out of 13 did not receive the last updated data; for the new process, Elexon still intends to send data by email. Is it considered that using the STAG mailing list will resolve the issue? If so, then can not the STAG mailing list be used in the current process</li> </ul> We believe that the inclusion in the BSCPs of the need to apply the revised values might help those NHHDA's who weren't aware of the obligations.  <b>Comments:</b> Changes to process.	Yes
CE Electric UK	No	<b>Comments</b> We reject this proposal based on the fact that we feel there are alternative, more efficient, methods of ensuring these updates are received and processed. Can obligations not be put in place to ensure that the recipients of this data act upon the instructions, rather than implementing changes that require system changes and charges. <b>Capacity in which Organisation is impacted:</b> LDSO <b>Impact on Organisation (e.g. systems/process changes)</b> System changes would be required to incorporate the changes to dataflows. <b>Comments:</b> We would require 6 months to implement any required system changes. <b>Would implementation in the proposed Release have an adverse impact?</b> No negative impact but please see comments above.	Yes

EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Neutral	<b>Capacity in which Organisation is impacted</b> : LDSO <b>Would implementation in the proposed Release have an adverse impact?</b> No <b>Other Comments:</b> Update to BCSP, suggestion to make this a mandatory requirement to remove any possible confusions.	-
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**CP1296 - Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 5 (CoP5) Meters**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	60
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	120
Stark	HHDC/HHDA/NHHDC/NHHDA	Yes	0
British Energy	Supplier	Yes	-
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	90

NPower Limited	Supplier, Supplier Agents	Neutral	365
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Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Electricity North West Limited	Yes	<b>Comments:</b> This change will enhance our current practice of reactive power charging by ensuring that meters have the facility to record reactive power data.	-
TMA Data Management Ltd	Yes	<b>Impact:</b> As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it	No
EDF Energy	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted:</b> MOP <b>Impact on Organisation :</b> Field Processes <b>Implementation No. of Calendar Days</b> 60 <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<b>Comments:</b> BSCP 601 should also refer to CoP 1,2, 3 & 5 for clarity not just CoP 5. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted:</b> LDSO <b>Impact on Organisation:</b> Improved Data Quality and more accurate DUoS Billing	Yes
Imserv	Yes	<b>Capacity in which Organisation is impacted:</b> MOA <b>Impact on Organisation:</b> Process changes primarily. <b>How much Implementation Notification is required from receipt of approved redline text changes?</b> No. of Calendar Days 90 <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
E.ON UK Energy Services	Yes	<b>Capacity in which Organisation is impacted:</b> MOA	Yes

Limited		<b>Impact on Organisation:</b> All meters currently utilised for this COPs have this capability.	
ScottishPower	Yes	<p>ScottishPower supports the move to capture reactive energy for the elective HH market. Under current arrangements there is no way to capture the amount of reactive energy being generated in the elective HH sector.</p> <p><b>Impact on Organisation's Systems and/or Processes?:</b> Yes</p> <p><b>Capacity in which Organisation is impacted :</b> MOA, Supplier, HHDC, LDSO</p> <p><b>Impact on Organisation:</b> Changes will be required for internal processes. However it is not envisaged that there would be system impact.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b> ScottishPower believe where actual reactive power information is available for both reactive excess and KVA that this should be used instead of estimates calculated from the power factors.</p>	Yes
Stark Software International Ltd	Yes	The COP5 wording always was and still remains unclear. 'Demand Period', 'Measured Quantities', 'Demand Values', 'Energy Measurements', 'shall be 'provided'' are ambiguous expressions and could easily be re-drafted to distinguish between HH data, demand registers and cumulative registers.	No
Western Power Distribution	No	<p>Please note these comments apply to CP1296. CP1297 and CP1298 which are all related.</p> <p>We agree with the need for kVARh import but do not think is necessary to record kVARh export for the vast majority of sites else we are increasing the volume of data handled by parties by 50% for little benefit.</p> <p>Reading the CPs for COP5 and COP10 it says it is about the meters having the <b>capability</b> to record reactive interval data but the red-lined versions of the CoPs make it mandatory to be set up?</p> <p>The amendments to BSCP514 imply it is only mandated for CT supplies and the CP says the obligation does not apply to whole current but this is not reflected in the changes to COP5 and COP10. The new BSCP also says if the meter has the capability it must be programmed (albeit only for CT).</p> <p>We think the changes should say:</p>	Yes

		<p>COP5/COP10 meters should have the capability to record interval kVArh import and kVArh export data.</p> <p>When trading HH COP5/COP10 must be setup to record interval kVArh import data. As we need kVArh import to correctly bill any HH site the distinction between CT and Whole Current (and any assumption that whole current COP10 will not trade HH) is inappropriate.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> HHMOA\LDSO</p> <p><b>Impact on Organisation:</b> Procedural changes and update to LWIs.</p>	
NPower Limited	Neutral	<p>It would to be appropriate that if DNOs are to adopt a common methodology for Reactive Power charging that the capability to record half-hourly Reactive Power (kvar) values should be mandated in CoP5.</p> <p>However, in mandating this capability consideration needs to be given to the following:</p> <ul style="list-style-type: none"> <li>• Will this render some types of CoP5 meters as non compliant? The storage of additional channels of half-hourly Reactive Power values will affect the number of days a meter can store. This may mean certain meters storage capacity drops below the existing CoP5 requirement of 20 days.</li> <li>• Will mandating the additional complexity increase the risk in managing the asset? Proving tests and in service testing will need to be performed on these assets and with extra channels there will be a greater chance of errors occurring.</li> </ul> <p><b>Implementation Comment:</b> As CP1296, CP1297, CP1298 &amp; CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.</p>	No



Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	SSE	601	3.4.7		The changes incorrectly state kvarh, demand should read kVAR
2	npower	BSCP601	3.4.7 (a)		Redline text contains the requirement ";and kvarh value is provided for each Reactive Energy Measured Quantity". We believe this should be kVar rather than "kvarh" and the requirement should read ";and <b>kVar</b> value is provided <b>for each Demand Period</b> for each Reactive Energy Measured Quantity".
3	npower	CoP 5	4.1.2 (iii) & (iv)		We believe that the additions of CoP5 4.1.2 (iii) & (iv) impact on 5.5.1 (ii), "a storage capacity of 48 periods per day for a minimum of 20 days for all Demand Values as defined in clause 4.1.2. The stored values shall be integer multiples of kW". Should the requirement "The stored values shall be integer multiples of kW" be removed, or changed to also include integer multiples of kVar?

## **CP1297 - Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 10 (CoP10) Meters**

### Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates in</b>	<b>Agreement Yes/No</b>	<b>Days Required to Implement</b>
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	60
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	120
British Energy	Supplier	Yes	-
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	90
NPower Limited	Supplier, Supplier Agents	No	365
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	No	-
Association of Meter Operators	Trade Association representing Meter Operators	Neutral	-

## Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Electricity North West Limited	Yes	<b>Comments:</b> This change will enhance our current practice of reactive power charging by ensuring that meters have the facility to record reactive power data.	-
TMA Data Management Ltd	Yes	<b>Impact:</b> As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it.	No
EDF Energy	Yes	<b>Capacity in which Organisation is impacted</b> MOP <b>Impact on Organisation :</b> Field processes <b>Implementation:</b> 60 Days <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<b>Comments:</b> BSCP 601 should also refer to CoP 1,2, 3,5 and 10 for clarity not just CoP 10 <b>Impact on Organisation's Systems and/or Processes?</b> No <b>Capacity in which Organisation is impacted:</b> LDSO <b>Impact on Organisation:</b> Improved Data Quality and more accurate DUoS Billing <b>Would implementation in the proposed Release have an adverse impact?</b> No	No
Imserv	Yes	<b>Capacity in which Organisation is impacted:</b> MOA <b>Impact on Organisation :</b> Process Changes <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
E.ON UK Energy Services Limited	Yes	<b>Capacity in which Organisation is impacted:</b> MOA <b>Impact on Organisation:</b> All meters currently utilised for this COPs have this capability.	Yes
Western Power Distribution	No	Please see response to CP1296.	Yes
ScottishPower	Yes	<b>Comments:</b> ScottishPower supports the move to capture reactive energy for the elective HH market. Under current arrangements there is no way to capture the amount of reactive energy	Yes

		<p>being generated in the elective HH sector.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> MOA, Supplier, HHDC, LDSO</p> <p><b>Impact on Organisation:</b> Changes will be required for internal processes. However it is not envisaged that there would be system impact.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b> Consideration should be given to the fact that COP10 meters are designed to allow customers using them to move between NHH and HH without a meter change. As NHH sites will not be required to record reactive energy a site visit may be required to reconfigure such meters to record reactive energy where this cannot be done remotely. This may impact on other documents and as such Elexon should investigate whether any further changes may be required to ensure this is captured and implemented correctly.</p>	
NPower Limited	No	<p><b>Comment:</b> We must recognise that there is a limit to the usefulness of half-hourly Reactive Power data and this limit is based on the load at site. The vast majority of sites where CoP10 compliant metering is installed will fall outside of the scope where this data is useful. It is highly likely that if this requirement is mandated the capability will only be 'switched on' at a small number of CoP 10 sites.</p> <p>CoP10 was intended to be 'lighter' version of CoP 5 to allow a cheap and simple method of recording half-hourly active data, particularly given consideration over the roll out of smart metering. Mandating these additional requirements will make CoP10 meters more complex and expensive. Aligning it closer to CoP 5 raises questions over the original requirement for CoP 10.</p> <p>We do not believe there is a case for imposing additional costs and requirements on this area of the market.</p> <p><b>Implementation Comments:</b> As CP1296, CP1297, CP1298 &amp; CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.</p>	No
Stark Software International Ltd	No	<p>The benefit of COP10 was to provide low cost HH data at sub 100kW metering points. This upgrade appears to mandate a very similar spec to COP5. Again there is ambiguity over the</p>	No

		description of terms. See comments on CP1296. <b>Capacity in which Organisation is impacted:</b> HHDC/NHHDC	
Association of Meter Operators	Neutral	<p>The ENA is managing a process to develop a common DUoS charging methodology. The process is ongoing and will result in changes being implemented in Apr 2010. The current proposals – available on ENA website – rely on ‘supercustomer’ DUoS billing for NHH customers, which does not rely on reactive data. This will not be a change for most Distributors, but there is at least one who is currently attempting reactive NHH billing. If the current proposals are adopted then reactive billing for NHH customers cease for all Distributors in April 2010.</p> <p>It would seem appropriate to review this CP as a result of the ENA members work. The probably outcome would be the need for reactive measurement for CT metered sites, but not for whole current. It would be unfortunate to initiate a change under the BSC for CoP10 which will add complexity and therefore cost to the metering requirements where there is no need – particularly when the requirement is not a ‘settlement’ requirement.</p>	-

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	SSE	601	3.4.7		As per CP1296, the changes incorrectly state kvarh, demand should read kVAr
2	npower	BSCP601	3.4.7 (a)		<p>Redline text contains the requirement ";and kvarh value is provided for each Reactive Energy Measured Quantity".</p> <p>We believe this should be kVar rather than "kvarh" and the requirement should read ";and <b>kVar</b> value is provided <b>for each Demand Period</b> for each Reactive Energy Measured Quantity".</p>

**CP1298 - Requirement on MOAs to Configure Meters to Record Half Hourly Reactive Power Data (for Half Hourly Settled CT-Metered Customers)**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	60
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
IMServ	NHHDC / NHHDA	Yes	90
E.ON UK Energy Services Limited	NHHDC/DA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
British Energy	Supplier	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	180
Western Power Distribution	LDSO, HHMOA, UMSO, MA, SMRA	No	-
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	No	30
NPower Limited	Supplier, Supplier Agents	Neutral	365

## Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Electricity North West Limited	Yes	<b>Comments:</b> This change will enhance our current practice of reactive power charging by ensuring that meters have the facility to record reactive power data, subsequently aligning with our licence condition statement.	-
TMA Data Management Ltd	Yes	<b>Impact:</b> As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it.	-
EDF Energy	Yes	<b>Capacity in which Organisation is impacted:</b> MOP <b>Impact on Organisation</b> Field processes <b>Implementation:</b> No. of Calendar Days 60 <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> No <b>Capacity in which Organisation is impacted</b> LDSO <b>Impact on Organisation:</b> Improved Data Quality and more accurate DUoS Billing	No
Imserv	Yes	<b>Capacity in which Organisation is impacted:</b> MOA <b>Impact on Organisation:</b> Process Changes <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
Scottish and Southern Energy	Yes	Section 8.4 of BSCP514 provides guidance for Complex Sites. At present, this only includes reference to Active energy and believe the proposed changes should perhaps include reference to reactive energy.	No
ScottishPower	No	<b>Comments:</b> ScottishPower agrees with the sentiment and goals of the change that reactive energy should be recorded for HH customers. However, as an LDSO, ScottishPower disagrees with limiting reactive energy recording to CT sites only. If a customer elects to become HH even if using whole current then they are liable for reactive energy charges and this is reflected in our DUoS charges which they incur. Therefore without	Yes

		<p>the CP being extended to all HH sites we feel we can not support the CP at this time.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes  <b>Capacity in which Organisation is impacted:</b> LDSO, MOA, Supplier  <b>Impact on Organisation (e.g. systems/process changes)</b> Internal process changes will be required however it is not envisaged there would be system changes required to implement the change</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No  <b>Other Comments:</b>  ScottishPower agrees with the aims of this and the other related CPs. However, we believe that the CP does not go far enough and should not be limited to CT sites only. If the CP was to be extended to all HH CT premises and elected HH WC or CT premises, we would be happy to give our full support to this CP.</p>	
E.ON UK Energy Services Limited	Yes	<p><b>Impact:</b> Yes  <b>Capacity in which Organisation is impacted:</b> MOA  <b>Impact on Organisation:</b> Modified procedures would be required for the re-configuration of legacy meters</p>	Yes
Western Power Distribution	No	Please see response to CP1296.	Yes
Stark Software International Ltd	No	<p>This would require the MOP to know if the meter was to be settled as HH or NHH. It is likely that if implemented, MOPs will configure all meters with HH reactive, causing unnecessary confusion/cost in non-settlement HH data provision to suppliers and customers.</p> <p>In the elective HH market, the metering point would not otherwise have had HH reactive data and this requirement again goes against the principle of low cost meter provision and collection in this market. In a later CP (CP1299), the HHDC is required to collect this data if available.</p> <p><b>Capacity in which Organisation is impacted:</b> HHDC  <b>Impact on Organisation</b> Increased costs of collection and transmission of data compared with the current (active energy only) requirement in the elective market. CP1299 also.  <b>Would implementation in the proposed Release have an adverse impact?</b> No</p>	Yes
NPower Limited	Neutral	<p><b>Comments:</b> Whilst we agree that meters should be configured to record half-hourly Reactive Import, we do not believe there is a strong enough case to also configure the meter to record half-hourly Reactive Export. Mandating this requirement will increase the volume of data between participants and have an associated cost. Is there any merit in collecting a stream of zero values on the Reactive Export channel for the vast majority of half-hourly settled CT metered customers?</p>	Yes



		<p>We also have the following issues:</p> <ul style="list-style-type: none"> <li>○ If the MOA is unable to identify a CT metered site is it likely that the MOA will configure the meter to record Reactive Power values irrespective of whether it is a CT metered or whole current?</li> <li>○ We are aware of existing D0268 issues and have some concern that mandating a solution will magnify these issues.</li> <li>○ Is there a lower cost solution that would target specific types of site more effectively and encourage those sites to manage their Reactive Power flows to help reduce distribution network costs?</li> </ul> <p><b>Impact on Organisation's Systems and/or Processes? Yes</b>  <b>Capacity in which Organisation is impacted: MOA</b>  <b>Impact on Organisation:</b> Our MOA would have to update their automated validation routines, handheld devices and meter templates within their propriety metering software.  <b>Comments:</b> As CP1296, CP1297, CP1298 &amp; CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.</p> <p><b>Would implementation in the proposed Release have an adverse impact? Yes.</b> We believe that given existing pressures on our half-hourly Agents and the impact this will have on their systems, they will require a 12 month minimum lead time from approval of redline text changes. This suggests that a November 2010 Release would be more appropriate.</p> <p><b>Costs:</b> Our MOA has indicated a cost of circa £300k to implement these changes.</p>	
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**CP1299 - Requirement on Half Hourly Data Collectors to Collect and Report Reactive Power Data (where the Meter is configured to record it)**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	
CE Electric UK	LDSO, UMSO	Yes	
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	180
British Energy	Supplier	Yes	-
IMServ	NHHDC / NHHDA	No	90
Stark Software International Ltd	HHDC/HHDA/NHHDC/NHHDA	No	-
E.ON UK Energy Services Limited	NHHDC/DA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Electricity North West Limited	Yes	<b>Comments:</b> This change will enhance our current practice of reactive power charging by ensuring that Agents have a requirement to always provide the data, subsequently aligning with our licence condition statement.	
TMA Data Management Ltd	Yes	<b>Impact:</b> As a HHDC, we are already capable for retrieving the reactive power data and transmit validated reactive data to the Supplier and Distributor if the metering is programmed to record it	No
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<b>Capacity in which Organisation is impacted</b> LDSO <b>Impact on Organisation</b> Improved Data Quality and more accurate DUoS Billing <b>Would implementation in the proposed Release have an adverse impact?</b> No	No
NPower Limited	Yes	<b>Comments:</b> We believe that this should remove any ambiguity that currently exists, although in practice HHDCs already collect and report data for all configured channels providing they are included in the Meter Technical Details (D0268 data flow).  Our only concern with this is alluded to in our response to CP1298. The expected increase in the volume of data between participants will have an associated cost. Is there any merit in collecting a stream of zero values on the Reactive Export channel for the vast majority of half-hourly settled CT metered customers?  As CP1296, CP1297, CP1298 & CP1299 were raised to address the issue of "Absent and erroneous Reactive Power data" we believe that if approved they should go through as a package of changes in the same Release. For CP1298 our MOA has stated that they will require a minimum of 365 days lead time from approval of the redline text to implement the necessary changes to their systems and processes. Therefore, 365 days should be recommended for all 4 CPs in order that they can be included in the same Release.	No
ScottishPower	Yes	<b>Comments:</b> ScottishPower strongly agrees with the aims of the CP and as such supports the change.  <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted :</b> Supplier, HHDC, LDSO, MOA <b>Impact on Organisation :</b> Internal process changes will be required however it is not	Yes

		envisaged there would be system changes required to implement the change	
Imserv	No	<p>At this time very few Suppliers have expressed either interest (or concerns) in regard to the estimation or validation of Reactive Power data to IMServ in their role as HHDC. This is despite the fact that a validation and estimation service is offered as a commercial agreement.</p> <p>Further, very few enquiries are received from Suppliers concerning Reactive Power data even for sites where Suppliers have taken a Validation and Estimation service.</p> <p>'Significant DUoS charging issues' suggests that a large volume of sites are frequently affected – our experience based on the above points contradicts this.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> HHDC</p> <p><b>Impact on Organisation:</b> Yes</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Yes. Additional development and processing required.</p>	Yes
Stark Software International Ltd	No	<p><b>Comments:</b> In the elective HH market, the metering point would not otherwise have had HH reactive data and this requirement again goes against the principle of low cost meter provision and collection in this market as the HHDC is required to collect this data if available.</p> <p>Many existing COP5 HH meters already have active energy only.</p> <p>MOPs may have difficulty in identifying HH/NHH COP10 Settlement arrangements and make mistakes in either direction.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> HHDC</p> <p><b>Impact on Organisation:</b> Increased costs of collection and transmission of data compared with the current (active energy only) requirement in the elective market. See CP1298 also.</p>	Yes
E.ON UK Energy Services Limited	Neutral	Although we are neutral on this CP we do consider it top be a logical extension of the related CPs	No

**CP1300 - System changes to support Change of Market Participant ID for the SVA Agent and MDD Agent Roles from 'CAPG' to 'SVAA'**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
The Electricity Network Company	Distributor	Yes	-
E.ON	Supplier	Yes	180
Electricity North West Limited	LDSO	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	90
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	yes	180
IMServ	NHHDC / NHHDA	Yes	90
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	30
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	90
G4S AccuRead	NHHDC, NNHDA, MOP	Yes	91
British Energy	Supplier	Yes	-
E.ON UK Energy Services Limited	NHHDC/DA	No	-
NPower Limited	Supplier, Supplier Agents	No	9 months
CE Electric UK	LDSO, UMSO	Neutral	-
Stark	HHDC/HHDA/NHHDC/NHHDA	Neutral	30

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
The Electricity Network Company	Yes	<b>Impact:</b> Distributor	Yes
E.ON	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted?</b> Supplier <b>Impact on Organisation:</b> System / processes	Yes
Electricity North West Limited	Yes	<b>Comments:</b> There will be a small impact via a system change and subsequent testing to ensure we can process the amended flow. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted?</b> LDSO <b>Impact on Organisation?</b> Small impact on systems and processes.	Yes
TMA Data Management Ltd	Yes	<b>Capacity in which Organisation is impacted:</b> NHHDC, NHHDA, HHDC, HHDA <b>Impact on Organisation:</b> Systems <b>Implementation :</b> No. of Calendar Days 90 <b>Costs:</b> The estimated cost for all 4 agencies is estimated to be £14 K	Yes
EDF Energy	Yes	<b>Comments:</b> We do not see that changing this id will have any impact as it will be dealt with under process for MDD updates	No
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	Yes	<b>Capacity in which Organisation is impacted</b> LDSO <b>Impact on Organisation?</b> System and Process changes <b>How much Implementation Notification is required from receipt of approved redline text changes?</b> No. of Calendar Days 180 <b>Would implementation in the proposed Release have an adverse impact? No</b>	Yes

Imserv	Yes	<p><b>Capacity in which Organisation is impacted:</b> HHDA, NHHDA</p> <p><b>Impact on Organisation:</b> Some configuration changes required</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p>	
Scottish and Southern Energy	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Impact on Organisation</b> Systems and processes</p> <p><b>Implementation</b> Days 30 - Allow for testing and making the changes</p>	Yes
Siemens Metering Services	Yes	<p><b>Agree Change? (Please delete as appropriate)</b> Yes</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO</p> <p><b>Impact on Organisation :</b> System changes required</p> <p><b>How much Implementation Notification?</b> 90</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No adverse impact</p>	Yes
ScottishPower	Yes	<p><b>Comments</b> Scottish Power believes that the proposed scripts to add in the new market participant could be managed by STAG as per the process identified in CP1295.</p> <p><b>Capacity in which Organisation is impacted:</b> HHDA, NHHDA, EAC/AA, HHDC, NHHDC, PARMS &amp; Supplier Systems.</p> <p><b>Impact on Organisation:</b> Systems would have to be re-configured to accept new market participant ID</p> <p><b>Comments</b> Proposed changes to HH systems will require a minimum 6 months lead time and will therefore have an impact on the proposed release date of February 2010.</p> <p><b>Costs:</b> Scottish Power feel that the proposed costs are almost prohibitively expensive for what is effectively a cosmetic change.</p>	Yes
AccuRead	Yes	<p><b>Capacity in which Organisation is impacted:</b> NHHDA / NHHDC (Ref: EAC/AA)</p>	Yes

		<b>Impact on Organisation : Systems</b>	
E.ON UK Energy Services Limited	No	<p><b>Comments:</b> We believe that the change of MPID is merely a cosmetic change and as such is hard to justify the associated costs to the community as a whole. In addition there are a large number of market participants currently operating with legacy MPIDs that do not reflect the current ownership of the agency service. If there were to be a wholesale change to MPIDs throughout the community triggered by this change. In addition to the significant costs associated with these changes there would be an increased risk that flows would be misdirected with the consequent impact on settlements.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> NHHDC and NHHDA</p> <p><b>Impact on Organisation :</b> Negligible</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b> MDD should be updated with this change which will load automatically, therefore causing no impact. A cosmetic change seems feasible for potential future changes to the service provider – add the change of name into the testing of the new service provider?</p>	Yes
NPower Limited	No	<p><b>Comments</b> There is no Business Justification for this change.</p> <p>Since the market opened in 1998 there has been many merges and acquisitions within the market resulting in MPIDs changing ownership. In some cases the same MPID is being used by different organisations, performing different roles, with different role codes. Therefore there are already many instances where the 4 Character MPID bears no resemblance to the name of the organisation that either owns or operates the MPID and this has not caused any issues within the market.</p> <p>The change of Service Provider from CAPG to SVAA is no different from previous changes within the market. MDD has already been updated to reflect the change of ownership and we believe this is sufficient. Making these additional changes will add significant costs to our Business for no benefit.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted</b> Supplier, HHDC, HHDA, NHHDA</p> <p><b>Impact on Organisation:</b> Settlement Systems, Agent Systems and Supplier Systems will</p>	Yes



		<p>all be impacted by this change</p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> Yes</p> <p><b>Costs</b></p> <p>We would incur system development costs on multiple systems and have to undertake testing on all of these which would incur cost for no apparent benefit. The process as its currently operating is not causing any issues and we don't see why it should be changed.</p>	
Stark Software International Ltd	Neutral	<p><b>Comments:</b> Happy to change, but do not really see the need. If the risks and costs are as high as indicated, consideration should be given to leaving well alone.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> HHDA/NHHDA/HHDC/NHHDC</p> <p><b>Impact on Organisation:</b> Minor system change</p>	Yes