CPC00666– Impact Assessment Responses for DCP0045, CP1301, CP1302 and CP1303

DCP0045- Maintenance of Outstation Type Information

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Gemserv	MRASCo Ltd	Neutral	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	180
E.ON UK Energy Services Limited	MOA NHHDC-DA	Neutral	-
British Energy Direct Limited	Supplier	No	Depending on option
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
Western Power Distribution	LDSO, MOA	Yes	90
E.ON	Supplier	Yes	-
Stark Software International Ltd	HHDC	Yes	30
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	90
SAIC on behalf of: ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	-
IMServ Europe	HHDC, MOA	Yes	-
Scottish and Southern	Supplier/Generator/ Trader / Party Agent / Distributor	-	30

| NPower Limited | Supplier, Supplier Agents | Yes | 180 |

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Organisation: EDF Energy	Yes	Our problem with original CP 1282 was the lack of a proactive notification mechanism. We do not have an option in this DCP that includes a proactive notification mechanism with CP 1282 which is what we would support. As such at present none of the options produced are exactly what we would see as being a complete process. **Option 1:** Process is simple and cost effective but notification mechanism is flawed and parties could miss vital information to enable them to fully operate in the market. **Option 2:** Process is simple and cost effective but using MDD notification mechanism seems to be using incorrect process. We feel a specific process to update just HHDC and HHMOPs is required. **Option 3:** Similar issues to option 1 but with addition that information is in two places and cannot always be relied upon to be consistent. **Option 4:** Information in two sources which are inconsistent, not seen to be a sensible mode of operation. **Option 5:** We feel that change can be managed without expense that a change to MDD would require. We already do not like fact that Elexon intend to corrupt use of flow version numbering due to lack of upgrades to some of their provided systems and this will just make that situation worse. **Additional comments on option 5A:** For one data item creating a new flow seems to be overkill. We feel that this can be dealt with easier if data is kept out of MDD process. **Additional comments on option 5B:** We would actually support getting rid of MDD version 002, but not for this particular change. We feel that Elexon should have updated NHHDA and SVAA software under CP 1269 but this change does not warrant making those changes. **Additional comments on option 5C:** We would then end up with versions 002 and 005 of MDD flows, making use of flow version numbering seemingly arbitrary. Option 5B would be better than this but we do not think it is necessary for this CP. **Comments on Option 6 (do nothing):** We do not think this is sensible as it is felt	Yes

		that change required to enable this to operate effectively is not complex. It does require an additional degree of control and management to be put in place which could be considered as an unnecessary overhead but we do feel that this will be worthwhile. **Which is you preferred Option?** None We feel that options 1 and 2 are closest to what is required. Problem in both cases is notification method. In option 1 using something like a Newscast means changes might never be seen and as such cannot be supported. In option 2 using MDD notifications ties data updates into a process which has no control over when details of new outstations types might arise. It also required changes to MDD change request process for a data item that is not in MDD itself. We feel that a new method of notification is required where information is provided in a specific format to a specified email list and for that communication to be acknowledged by each recipient so that Elexon can prove that information was available to all parties that could require these details. To do this a new process within BSCPs 502 and 514 should be established. This will include ensuring any new parties entering as a HHDC or HH MOP provide Elexon with an email address for such communications. **Capacity in which Organisation is impacted** (e.g. Supplier, HHDC, etc)　　HH MOP and Supplier **Impact on Organisation** (e.g. systems/process changes)　　System and process changes required How much Implementation Notification would be required from receipt of approved redline text changes? **Comments:** We would normally require six months to make this change. However, other work on our HHMOP system currently being carried out mean we would not wish to implement this change prior to November 2010.	
Organisation: British Energy Direct Limited	No	The primary purpose of the DTC is to ensure that all information included on any market participant interaction is recognised as valid and any non-compliance acted upon. To shift this requirement away from the DTC will only cause this information to deteriorate, causing system failures for multiple, compliant participants and the unnecessary need for bilateral agreements to be set up between agents and suppliers for the purpose of executing manual workarounds in order to accommodate non-compliant Outstation Types.	Yes

		As none of the given options reinforce the requirement to adhere to the DTC valid set and progress changes in line with current MRASCo guidelines, British Energy cannot support the DCP. We suggest that the approval process of new metering equipment is aligned with the closest future DTC release or review the mandatory use of Outstation Type with respect to effect on Settlement. **Comments on Option 1 (CP1282)** As above, the purpose of the DTC is to ensure that all market participants are compliant. Removal of the valid set from the DTC would remove any validation processes and would potentially enable inaccurate information to be entered. **Comments on Option 2** (notification via MDD Change Request) As per our comments against Option 1. **Comments on Option 3** (minimal change) The DTC release is not frequent enough. There would be a period where a non compliant outstation type would cause the D0268 to fail. There is also no requirement on the MOP to resend the D0268 flow once the metering is approved. **Comments on Option 4** (hybrid of options 2 and 3) As per our comments against Option 1 and Option 3. **Comments on Option 5** (full MDD change) As per our comments against Option 1. **Which is you preferred Option?** None **Rational**: For the reasons outlined above. **Capacity in which Organisation is impacted** (e.g. Supplier, HHDC, etc) Supplier **Impact on Organisation** (e.g. systems/process changes) Systems and process changes How much **Implementation** Notification would be required from receipt of approved redline text changes? Would be dependant upon which option is agreed.	
Organisation: EDF Energy Networks (EPN,LPN,SPN)	Yes	**Which is you preferred Option? (delete as appropriate)** 5C **Rationale** This would be the cleanest option and minimal impact from a system	-

EDF Energy (IDNO) Ltd		point of view	
		Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes	
		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) LDSO	
		Impact on Organisation (e.g. systems/process changes) System and Process	
Organisation: Western Power Distribution	Yes	**Comments on Option 1 (CP1282)** We could live with this but would prefer a more formal change process when the list of codes is updated.	Yes
		Comments on Option 2 (notification via MDD Change Request) This is a reasonable solution	
		Comments on Option 3 (minimal change) Don't like this as it means there are two lists in operation. They will just get out of sync and this will be confusing..	
		Comments on Option 4 (hybrid of options 2 and 3) **Don't like this.**	
		Comments on Option 5 (full MDD change) Too much work involved.	
		Comments on Option 6 (do nothing) This is also a reasonable solution.	
		Which is you preferred Option? (delete as appropriate) 2	
		Rationale: On balance this is the simplest solution that results in an up to date list of codes being held somewhere. UMS charge codes operate in a similar way and we cope with that reasonably well.	
		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) HHMO/LDSO	
		Impact on Organisation (e.g. systems/process changes) Minor system and documentation changes	
Organisation: E.ON	Yes	**Impact:** We do not have a preference – options 1-4 have the same impact on our systems	-
		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) HHDC	
Organisation: Stark Software International Ltd	Yes	As so few parties are impacted, all that is needed is a single up to date authorititive list	No

		Comments on Option 1 (CP1282) Preferred option No Impact	
Organisation: TMA Data Management Ltd	Yes	**Comments on Option 1 (CP1282)** This is the preferred option, participants if concerned about missing an update can introduce processes to check the published approval list weekly. **Comments on Option 2** (notification via MDD Change Request) The duplication and potential inconsistency of information is not satisfactory. **Comments on Option 3** (minimal change) The timescales are too slow to provide an enduring solution in a potentially fast evolving environment. **Comments on Option 4** (hybrid of options 2 and 3) The time laps between the MDD update and the DTC update makes the DTC update irrelevant **Comments on Option 5** (full MDD change) This change is too expensive for the benefit offered **Comments on Option 6** (do nothing) This is not a solution **Which is you preferred Option?** (delete as appropriate) 1 **Rationale** This option offers the quickest way for a new outstation type to be used within the market after protocol approval and as such is our preferred option **Capacity in which Organisation is impacted** (e.g. Supplier, HHDC, etc) HHDC **Costs:** The cost of implementing this change would be low.	
Organisation: SAIC on behalf of: ScottishPower	Yes	**Comments on Option 1 (CP1282)** ScottishPower previously rejected CP1282 as we didn't agree with the removal of Outstation Type from the DTC. ScottishPower again reject this option for the same reason. In addition ScottishPower are unclear why this has been put forward as an option given that it was previously rejected by SVG. **Comments on Option 2 (notification via MDD Change Request)** ScottishPower previously rejected CP1282 as we didn't agree with the removal of Outstation Type from the DTC. We reject this option for the same reason. **Comments on Option 3 (minimal change)** Due to the infrequent creation of new	Yes

		Outstation Types, this would appear to be the best option as DTC change requests can be raised for the most appropriate industry release when required. Publishing an approval list on the Elexon website/in the Newscast would also keep parties informed of new Outstation Types ahead of a change proposal being raised.
		Comments on Option 4 (hybrid of options 2 and 3) Involving MDD CRs in this option seems over-complicated and would not provide any more benefit than Option 3.
		Comments on Option 5 (full MDD change) All the full MDD change options result in significant cost and, should parties wish to receive new Outstation Type information via MDD, the potential of additional and significant system cost. Given the infrequent creation of new Outstation Types, this would appear to be excessively expensive for few changes.
		Additional comments on option 5A Adds further, infrequent updates in MDD outside of the existing D0269/D0270. Given the current ex-MDD data issues investigated in CP1295, it seems reasonable to avoid adding further data to be transferred in this way.
		Additional comments on option 5B Additional and significant system cost in moving to a new Version 005 where DCs continue to use Version 002 of the D0269/D0270 flow.
		Additional comments on option 5C Additional and significant system cost in moving to a new Version 005 where DCs continue to use Version 002 of the D0269/D0270 flow.
		Which is you preferred Option? Option 3
		Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) No
Organisation: IMServ Europe	Yes	The delays in approving outstation types and adding to the valid set can cause an impact on a data collectors ability to retrieve data from installed meters. We agree with the intention of this CP to improve this process and reduce the risk of DCs not being able to dial outstation types or resorting to workarounds.
		Comments on Option 1 (CP1282) This option would provide the most timely updates to all interested parties.
		Comments on Option 2 (notification via MDD Change Request) Whilst this

		may be quicker than the current process this options does not remove potential delays in registering new outstation types or the need to operational workarounds.	
		Comments on Option 3 (minimal change) On the assumption that meter operators could make use of the codes as soon as they are published this would allow for immediate use of new Outstation Types, with the DTC update as a formal update at a later date.	
		Comments on Option 4 (hybrid of options 2 and 3) **A**s option 2 above	
		Comments on Option 5 (full MDD change) As option 2 above	
		Additional comments on option 5A As option 2 above	
		Additional comments on option 5B As option 2 above	
		Additional comments on option 5C As option 2 above	
		Comments on Option 6 (do nothing) Current process not viable and causes unnecessary delays in the process, impacting on data completeness.	
		Which is you preferred Option? (delete as appropriate) 3. Assuming that all Meter Operators would be able to use the Outstation Type following the publishing on the website, rather than waiting for the DTC update, this would be our preferred solution.	
		Rationale Provides the most timely notification and removes delay and/or operational workarounds.	
		Impact on Organisation's Systems and/or Processes? Yes	
		Capacity in which Organisation is impacted: HHDC	
		Impact on Organisation : Process changes	
Organisation: Scottish and Southern	-	**Comments on Option 1 (CP1282)** This appears to be a simple, solution. With single central list of Outstation Types	Yes
		Comments on Option 2 More complex solution. List maintained in two separate places which may be inconsistent.	
		Comments on Option 3 (minimal change) More complex solution. List	

maintained in two separate places which may be inconsistent.

Comments on Option 4 (hybrid of options 2 and 3) More complex solution. List maintained in two separate places which may be inconsistent.

Comments on Option 5 (full MDD change) More complex and costly solution. Significant effort involved in changing MDD load procedures.

Comments on Option 6 (do nothing): There will be no agreed central list of Outstation Types.

Which is you preferred Option?   1

Rationale   A simple solution with little system changes.

Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)   Yes

Impact on Organisation: Manual effort in maintaining list of valid Outstation Types in line with the published codes.

| **Organisation:** NPower Limited | Yes | **Comments on Option 1 (CP1282)**   Removing the valid set from the DTC and replacing it with an ELEXON published approved list will substantially reduce the time taken to release a new meter.

To avoid the risk of missing the release of a new meter (Outstation) we would like communication for notifying Industry Parties improved and not just sent via newscast, for example an email sent to an individual/generic email address.

Comments on Option 2 (notification via MDD Change Request)   This is an improvement but does not solve the problem of unnecessary delays in the release of new Outstation Types.

It also introduces duplication of lists (Approval List and MDD). This should be avoided at all costs as this could introduce inconsistencies if different agents use different valid sets i.e. if the sending agent implements the ELEXON Approval List and the receiving agent implements the DTC Valid set.

Comments on Option 3 (minimal change)   DTC changes take too long to approve and implement. This option does not solve the problem.

It also introduces duplication of lists (Approval List and DTC Valid Set). This should be | Yes |

avoided at all costs as this could introduce inconsistencies if different agents use different valid sets i.e. if the sending agent implements the ELEXON Approval List and the receiving agent implements the DTC Valid set.

Comments on Option 4 (hybrid of options 2 and 3)   There is no need for maintenance of three lists (Approval List, MDD and DTC Valid Set). This will undoubtedly cause confusion, inconsistency and increases the risk that DCs reject MTDs. DTC changes take too long to approve and implement. It also introduces duplication of lists (Approval List and DTC Valid Set). This should be avoided at all costs as this could introduce inconsistencies if different agents use different valid sets i.e. if the sending agent implements the ELEXON Approval List and the receiving agent implements the DTC Valid set.

Comments on Option 5 (full MDD change)   Totally Disagree. This would be costly to implement with no Benefits for Suppliers.

Comments on Option 6 (do nothing)   Doing nothing is not an option - This is an issue which requires attention.

Which is you preferred Option? (delete as appropriate)   1

Rationale   Option one is our preferred Option with the Caveat that communication of the new meter types can be improved.

Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes

Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)   Supplier, HHMOA and NHHDC

Impact on Organisation (e.g. systems/process changes) System Impacts and New processes Required

CP1301 - Registration Requirements for System Connection Points Between Onshore Distribution Systems and Offshore Transmission Systems

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Gemserv	MRASCo Ltd	Neutral	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
E.ON UK Energy Services Limited	MOA NHHDC-DA	Neutral	-
British Energy Direct Limited	Supplier	-	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-
Western Power Distribution	LDSO, MOA	Yes	-
E.ON	Supplier	Yes	-
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Neutral	-
SAIC on behalf of: ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
IMServ Europe	HHDC, MOA	-	-
Scottish and Southern	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Organisation: EDF Energy Networks (EPN,LPN,SPN)	Yes	**Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)** LDSO **Impact on Organisation** (e.g. systems/process changes) System / Process	Yes
Organisation: E.ON	Yes	**Capacity** in which Organisation is impacted : HHDC **Impac**t on Organisation : system	Yes
Organisation: SAIC on behalf of: ScottishPower	Yes	Potential documentation changes only.	-

CP1302 - Requirement on Half Hourly Data Collectors to Validate Reactive Power Demand Values

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Gemserv	MRASCo Ltd	Neutral	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
E.ON UK Energy Services Limited	MOA NHHDC-DA	Neutral	0
British Energy Direct Limited	Supplier	Yes	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes	-

Western Power Distribution	LDSO, MOA	Yes	0
E.ON	Supplier	Yes	-
Stark Software International Ltd	HHDC	No	180
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes	90
SAIC on behalf of: ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	60
IMServ Europe	HHDC, MOA	No	90
Scottish and Southern	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
NPower Limited	Supplier, Supplier Agents	No	365

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Organisation: EDF Energy Networks (EPN,LPN,SPN)	Yes	**Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)** LDSO **Impact on Organisation** (e.g. systems/process changes) System / Process	
Organisation: Western Power Distribution	Yes	**Comments** Should improve data quality. **Impact on** Organisation's Systems and/or Processes? Yes **Capacity in which Organisation is impacte**d: LDSO **Impact on Organisation:** Should reduce the number of queries we have in this area.	Yes

Organisation: E.ON	Yes	**Capacity** in which Organisation is impacted : HHDC **Impac**t on Organisation : system	Yes
Organisation: Stark Software International Ltd	No	**Impact** on Organisation's Systems and/or Processes? Yes **Capacity** in which Organisation is impacted: HHDC Impact on Organisation (e.g. systems/process changes) Significant system changes in both DR and DC to collect and store reactive register readings not currently needed. New validation rules to be implemented. New procedures. Additional training. Cost of implementation and subsequent operations significant. **Would implementation in the proposed Release have an adverse impact?** Prompt decision needed as Feb10 is earliest possible date. **Other Comments:** I believe that better rules than those proposed could be implemented more cheaply and easily that would improve current quality and could be largely automated. Eg Upper limits for reactive data and/or rules that compared reactive to validated active data in the same half hour.	Yes
Organisation: TMA Data Management Ltd	Yes	**Impact on Organisation:** System and process **Costs:** The financial impact of implementing this change is low	Yes
Organisation: SAIC on behalf of: ScottishPower	Yes	**Capacity in which Organisation is impacted:** Supplier, LDSO, HHDC, HHDA, Generator **Impact on Organisation** None **Would implementation in the proposed Release have an adverse impact?** No	-
Organisation: IMServ Europe	No	**Comments:** We do not believe there is sufficient benefit to justify the additional cost/effort to implement these changes. 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.	
		Further, very few enquiries are received from Suppliers concerning Reactive Power data even for sites where Suppliers have taken a Validation and Estimation service.	
		Impact on Organisation's Systems and/or Processes? : Yes	
		Capacity in which Organisation is impacted: HHDC	
		Impact on Organisation (e.g. systems/process changes) Whilst we can already provide this where specifically requested some configuration will be required to perform this for all settlement MPANs.	
		There will also be a potential impact on processes with the extra checks being undertaken.	
Organisation: Scottish and Southern	Yes	As this change only addresses the issue of erroneous kVArh data returned by HHDC and not missing data, we believe that it should only be progressed if the related change CP1303 is also approved.	-
Organisation: NPower Limited	No	In principle we support the objective of the CP, however our rejection is based on the proposed solution, rather than a rejection of validating Reactive Power in general.	
		We believe that MAR validation of Reactive Power data should also be a requirement on the HHDC, and should be added to section 4.8 of BSCP502. MAR validation "has a proven track record" of producing accurate Active Power data, and see no rationale in the CP as to why this has been excluded. We appreciate that the number of MAR sites is not significant but they do represent a proportionately higher volume of energy (CoPs 1, 2 and 3) which we believe should be validated. We also appreciate that some HHDCs may already perform validation of Reactive MAR reads, however as this is not an obligation in section 4.8 (Active Power only), we believe this should be added/mandated.	
		Impact: Systems and process changes	
		Comments: As CP1296, CP1297, CP1298, CP1299, CP1302 & CP1303 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 CP1302 & CP1303 our HHDC 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 6	

	CPs in order that they can be included in the same Release.		

CP1303 - Requirement on Half Hourly Data Collectors to Estimate Missing Reactive Power Demand Values

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Gemserv	MRASCo Ltd	Neutral	-
EDF Energy	Supplier, NHH Agent and HH MOP	Neutral	-
E.ON UK Energy Services Limited	MOA NHHDC-DA	Neutral	-
British Energy Direct Limited	Supplier	Yes	-
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO		
Western Power Distribution	LDSO, MOA	Yes	0
E.ON	Supplier	Yes	-
Stark Software International Ltd	HHDC	No	180
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	yes	
SAIC on behalf of: ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	180
IMServ Europe	HHDC, MOA	No	90
Scottish and Southern	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-

NPower Limited	Supplier, Supplier Agents	No	365

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Organisation: EDF Energy Networks (EPN,LPN,SPN)	Yes	**Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)** LDSO **Impact on Organisation** (e.g. systems/process changes) System / Process	
Organisation: Western Power Distribution	Yes	**Comments** Should improve data quality. **Impact** on Organisation's Systems and/or Processes? Yes **Capacity** in which Organisation is impacted :LDSO **Impact on Organisation** : Should reduce time we spend dealing with missing readings.	Yes
Organisation: E.ON	Yes	**Capacity** in which Organisation is impacted : HHDC **Impac**t on Organisation : system	Yes
Organisation: Stark Software International Ltd	No	**Capacity in which Organisation is impacted :** HHDC **Impact on Organisation :** Significant system changes in both DR and DC to collect and store reactive register readings not currently needed. New estimation rules to be implemented. New procedures. Additional training. Cost of implementation and subsequent operations significant. **Would implementation in the proposed Release have an adverse impact?** Feb2010 is tight **Comments:** SSI asked suppliers if this was required and received little positive response. Some parties strongly believe that if not actual data then estimation is completely inappropriate. See detailed comments below re Redlined text	Yes

Organisation: TMA Data Management Ltd	Yes	**Capacity in which Organisation is impacted:** HHDC **Impact on Organisation:** System and process **Would implementation in the proposed Release have an adverse impact?** No **Costs:** The financial impact of implementing this change would be medium	Yes
Organisation: SAIC on behalf of: ScottishPower	No	In principle ScottishPower agree that the reactive channels should be estimated but think more consideration needs to be taken in regard to the estimation of reactive channels when a site is capable of generation. Estimation methods 4.2.1 E & F could potentially lead to erroneously high reactive estimates if the average load shape is calculated using periods when the site is importing and periods when it is exporting. For example, for 3 of the periods used to calculate the average load shape the site is exporting and for one it is importing. The AI channel will be estimated with a relatively small advance. The AE channel will be estimated at zero. Depending on how the site is operating large advances may be seen on either the RI or the RE channel, the reactive advances may also increase significantly when the site exports. If the distributor uses these values in their calculation of DUOS charges, they will see high reactive values for a time period with a corresponding AI advance, the erroneously high reactive values lead to a poor power factor and high DUOS charges. When a site is identified as being capable of generation we would suggest that the RI and RE channels should be estimated using rules more akin to those of the Export	Yes

		Metering Systems described in section 4.2.2.	
		For estimation methods 4.2.2 A & E it may be better to leave the period values as Null rather than populating them with estimated zeros.	
		Impact on Organisation's Systems and/or Processes? Yes	
		Capacity in which Organisation is impacted Supplier, LDSO, HHDC, HHDA	
		Impact on Organisation: System and process changes	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
Organisation: IMServ Europe	No	Comments: We do not believe there is sufficient benefit to justify the additional cost/effort to implement these changes. 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. Further, very few enquiries are received from Suppliers concerning Reactive Power data even for sites where Suppliers have taken a Validation and Estimation service. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted** HHDC **Impact on Organisation** Whilst we can already provide this where specifically requested some configuration will be required to perform this for all settlement MPANs. There will also be a potential impact on processes with the extra checks being undertaken.	
Organisation: NPower Limited	No	In principle we support the objective of the CP, however our rejection is based on the proposed solution, rather than a rejection of estimating Reactive Power in general.	

Estimation methodology: The CP recognises that the issue is made more difficult by the "inconsistent approaches to estimation adopted by different LDSOs". In allowing the HHDC to elect whether to "vary the standard methods 4.2.1(b) to 4.2.1(h) to use available Active Power is estimating Reactive Power values", the solution is merely substituting an inconsistent approach to estimation by the LDSOs with an inconsistent approach by the HHDCs. As such, the proposed solution does not resolve the issue raised in the CP. Furthermore, as this is something that directly impacts Supplier and Customer billing there must be consistency and transparency of approach.

If the HHDC can choose the estimation methodology and Suppliers instruct HHDCs which methods to use this may result in: (1) when a customer changes Supplier (no change of HHDC) the HHDC may have to change the methodology used due to a differing request for approach from the Supplier; or (2) when there is a change of HHDC concurrent with change of Supplier the methodology may change. Both of these could lead to customers being able to get better deals from some Supplier/DC pairings and may also lead to queries and challenges from LDSOs when DUoS charges vary following these changes.

We believe the option (use of the word "may" in 4.2.3 paragraph 2) for the HHDC to choose the estimation methodology should be removed, and replaced with a clear instruction as to the method of estimation to be used. Using available Active Power profile data (in conjunction with the standard Active Power estimation methodology in section 4.2.1) to aid the determination of the Reactive Power period values is more robust than just using the standard methods in isolation. This will provide the accuracy and consistency required by the industry.

Definition of "missing" data: The wording in 4.2 paragraph 1 and 4.2.3 paragraph 1, does not provide sufficient clarity as to when the HHDC should provide estimated data. The "Note" section (paragraph 6, Proposed Solution) clearly states that estimations will only apply "where Meter Technical Details indicate that the Meter has been configured to record Reactive Power period values." This wording is absent from the redline text and is necessary to provide clarity to HHDCs as to their estimation obligations.

Impact: Systems and process changes

Comments: As CP1296, CP1297, CP1298, CP1299, CP1302 & CP1303 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 CP1302 & CP1303 our HHDC 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 6 CPs in order that they can be included in the same Release.	
	There are inconsistencies in the use of kvar or kVAr, kvarh or kVArh in the BSC and Metering CoPs. The convention adopted when drafting the package of Reactive CPs was kvar and kvarh. Whilst we do not believe this to be a material issue we feel this should be highlighted in case other Parties believe there may be scope for confusion or legal challenge.	

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	Npower	BSCP502	1.6.1		kvarh should be detailed in the Acronyms section
2	Npower	BSCP502	4.2.3		We believe there is no need to include "where possible" in paragraph 1, as "where it is not possible" is stated in paragraph 3.
					It may be appropriate to replace "where possible" in paragraph 1 with a statement which clarifies when HHDCs should estimate Reactive Power period values as per the "Note" in the CP:
					"These estimation requirements will only apply where the Meter Technical Details indicate that the Meter has been configured to Record period values, but has not been possible to read these values from the Meter for one or more Settlement Periods. HHDCs are not required to (and should not) estimate Reactive Power values for Metering Systems that do not have Reactive Power channels defined in the Meter Technical Details."
3	Npower	BSCP502	4.2.3		If paragraph 2 "The HHDC may vary the standard methods may vary the standard methods 4.2.1(b) to 4.2.1(h) to use available Active Power in estimating Reactive Power values" is to remain, it should read ""The HHDC may vary the standard methods may vary the standard methods 4.2.1(b) to 4.2.1(h) to use available Active Power **period values** in estimating Reactive

					Power values".
					The Active Power period values also need to be the same period values associated to those of the missing Reactive Power period values. This is not obvious from the wording.
4	Npower	BSCP502	4.2		General inconsistent use of the terms "Reactive Power period values", "Reactive Power data", "Reactive Energy consumption" and "Reactive Power values". Is the HHDC estimating Reactive Energy (kvarh) or Reactive Power (kvar)?
5	Npower	BSCP502	4.2		With respect to the Housekeeping Change contained within CP1303, the redlined text does not resolve the issue as there are several other instances in BSCP502 where there is a reference to Appendix 4.7 when it should refer to Appendix 4.8. For example, 3.2.4.12 & 3.2.7.13. Will these other instances also be addressed as part of the Housekeeping Change or will it just be the last paragraph of section 4.2 as noted in the CP?
6	Npower	BSCP502	4.2		As Reactive Power values do not feed into Settlement, is it correct to associate missing Reactive Power values with "Settlement Periods"? For example, in 4.2.1(h) paragraph 2, "When estimating Reactive Energy consumption the HHDC will use the procedure specified above in conjunction with a default power factor of 0.9 to derive the Reactive Import estimates for the missing Settlement Periods".
7	Npower	BSCP502	4.9		The Complex Site Supplementary form does not cater for the transfer of Reactive power configuration for complex metering. As this drives the HHDC requirements for validation and estimation for these sites we believe this configuration should also be included.
8	Npower	BSCP502			There are several instances in BSCP502 where there is a reference to Appendix 4.8 when it should refer to Appendix 4.9. For example, 1.6.2 "Definitions", 3.2.1.3 & 3.2.4.4.
					Will this be addressed in a separate Housekeeping Change?
9	Npower	BSCP502	4.2		Section 4.2 paragraph 10 currently states:
					"If a data estimation has been completed and submitted to the HHDA and

					actual 'A' flag data OR information leading to more accurate estimated data becomes available, this revised data shall be notified to the Supplier and LDSO and submitted to the HHDA for use in the next Volume Allocation Run."
					Given that the estimation methodology for Reactive Power period values proposed by CP1303 constitutes, in our opinion, a better quality estimation than that currently in place, the HHDCs will be non-compliant with this section if they do not re-submit data with the improved methodology for all sites, at every Settlement Run.
					We recommend a footnote is added referencing this paragraph stating that for Reactive Power data estimation the obligation is only applicable for Settlement Days after the implementation date of the CP.