# <u>CPC00667- Impact Assessment Responses for Change Proposal Impact Assessment Timetable 2009/2010 CP1304, CP1305, CP1306, CP1307 and CP1308</u>

#### Change Proposal Impact Assessment Timetable 2009/2010

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No
Central Networks	LDSO	Yes
EDF Energy	Supplier, NHH Agents, HH MOP	Yes
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes
G4S AccuRead	NHHDA, NHHDC, NHHMOP, HHMOP	Yes
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes
Scottish and Southern Energy	Southern Energy Supplier/Generator/ Trader / Party Agent / Distributor  Additional Comment: It is a good idea to include this within the monthly change pack as opposed to an ad-hoc nature in the past.	
NORW, EELC, ENG, EMEB, PGEN	Supplier	Yes
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes
NPower Limited	Supplier, Supplier Agents	Yes
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral
GTC	LDSO	Neutral
Gemserv	MRASCo Ltd	Neutral
TMA Data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Neutral

# CP1304 - Exclusion of certain Site Visit Check Codes (SVCC) within the Long Term Vacant (LTV) site process

#### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)  Agreeme Yes/No		Days Required to Implement
Central Networks	LDSO	Yes	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	N/A
GTC	LDSO	Neutral	-
Gemserv	MRASCo Ltd	Neutral	-
EDF Energy	Supplier, NHH Agents, HH MOP	No	
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes	30
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	No	-
G4S AccuRead	NHHDA, NHHDC, NHHMOP, HHMOP	Yes	0
British Energy Direct Limited	Supplier	Yes	30
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	10 months
E.ON	Supplier	Yes	
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	
E.ON Energy Services Limited	NHHDC MOA	Neutral	0
NPower Limited	Supplier, Supplier Agents	Yes	180

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Independent Power Networks Limited	Neutral	No additional comments.	No

GTC	Neutral	Impact on Organisation's Systems and/or Processes? No	No
EDF Energy	No	Comments: A D0004 allows for multiple Site Visit Check Codes to be sent and so a code 02 can be sent in all cases were site is vacant. We would accept a change where if a code 02 is received amongst multiple other SVCCs then site can still be considered as being long term vacant. This would require a change to section 4.15.1 point 3 second bullet in BSCP504. Wording such as, could be suitable:	
		"has not received any D0004s where a J0024 data item has excluded a value of 02 in the interim"	
		If Suppliers and DCs have a problem in sending and receiving multiple values then this is their problem and is an insufficient reason for this change. There would seem to be no other reason for a change of this form rather than one that allows for multiple values and checks that a 02 has been seen in all D0004s. If they do have problems then in such cases they should agree that code 02 takes precedence over all other codes and send that one only. This process is currently full of aspects that cannot be easily verified, making its use suspect, so to relax rules around this process cannot be considered as a positive step forward.	
		Furthermore we do not feel that any of these codes in themselves are sufficient to indicate site is long term vacant. All of these could still be used where a site is not vacant in terms of providing information on potential hazards to be aware of.  Impact on Organisation's Systems and/or Processes?  No Impact on Organisation: We do not currently use this process so change will have no impact.	
IMServ Europe	Yes	These are a sensible set of changes.	No
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation: Procedural changes only	
		Implementation: 30	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
EDF Energy Networks	No	Firstly if two 02 codes are received within 7 months then that is probably enough to	Yes

(EPN,LPN,SPN)		indicate the site is vacant.	
EDF Energy (IDNO) Ltd		However we do not agree that codes 18,19,20 and 28 on their own indicate that the site is definitely vacant. For example how does no access or insufficient address details mean a site is vacant?  Perhaps an alternative might be to allow a facility for two codes to be entered and as long as one was a 02 then it would count as vacant (this would cover a scenario for example where the site was vacant but premises were unsafe - both pieces of information are useful, a second example would be vacant and no access).  Impact on Organisation's Systems and/or Processes? Yes	
		Capacity in which Organisation is impacted : LDSO  Impact on Organisation : Processes	
G4S AccuRead	Yes	The use of the Statistics gathered over the year to show which code caused a site to leave the LTV process does not prove anything and should be removed. It does not specify whether these sites were removed incorrectly or not and therefore prove nothing.  Impact: No	
British Energy Direct Limited	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? Supplier Impact on Organisation? Process changes Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?	Yes
Scottish Power	Yes	Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No	No
Scottish and Southern Energy	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? NHHDC, Supplier Impact on Organisation? Significant changes to our system and processes. Additional comments: Due to our current IT scheduling, it will not be possible for us meet the proposed implementation date.	Yes
E.ON	Yes	Capacity in which Organisation is impacted? Supplier	Yes

		Impact on Organisation? Systems / process	
E.ON Energy Services Limited	Yes	Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes	
		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)  Volume only	
		Impact on Organisation (e.g. systems/process changes) None	
		Comments No changes to current practise	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
		<b>Comments:</b> As a NHH-DC we would not use code 28, for this reason however as the volume is so small we hold no objection as it's the Supplier's decision to install as LTV.	
NPower Limited	Yes	Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes	Yes
		Capacity in which Organisation is impacted Supplier	
		Impact on Organisation (e.g. systems/process changes) System and Process Changes	

No comments on redline text

## CP1305 - Use of Site Visit Check Code (SVCC) 20 with additional information in the Long Term Vacant (LTV) process

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement	
Central Networks	LDSO	Yes		
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	N/A	
GTC	LDSO	Neutral		
Gemserv	MRASCo Ltd	Neutral	-	
EDF Energy	Supplier, NHH Agents, HH MOP	No		
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes	30	
EDF Energy Networks (EPN,LPN,SPN)	LDSO, SMRS, UMSO	No	-	
EDF Energy (IDNO) Ltd				
G4S AccuRead	NHHDA, NHHDC, NHHMOP, HHMOP	No	0	
British Energy Direct Limited	Supplier	Yes	30	
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0	
TMA Data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	No	-	
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	10 months	
E.ON	Supplier	Yes		
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes		
E.ON Energy Services Limited	NHHDC MOA	Yes	0	
NPower Limited	Supplier, Supplier Agents	Yes	180	

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Independent Power Networks Limited	Neutral	<b>Comment:</b> IPNL are neutral to the proposal. We note that the change document states "We note that this may be difficult to implement as it involves looking at the additional information field which may be difficult to automate. It would be up to the Supplier whether they do so". We hold concerns that if this process is not automated or sufficiently monitored, there is potential for sites to remain in the LTV process if it is assumed that SVCC '20' means the site is vacant without checking the free text field.	No
GTC	Neutral	Impact on Organisation's Systems and/or Processes? No	No
EDF Energy	No	Please see our comments for CP 1304 as they are also relevant to this CP.  Impact on Organisation: We do not currently use this process so change will have no impact.	
IMServ Europe	Yes	These are a sensible set of changes.  Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation: Procedural changes only	
		Implementation: 30	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	No	If two 02 codes are received within 7 months then that is probably enough to indicate the site is vacant.  However we do not agree that codes 18, 19, 20 and 28 on their own indicate that the site is definitely vacant. For example how would no access or insufficient address details mean a site is a vacant one?	Yes
		Perhaps an alternative might be to allow a facility for two codes to be entered and as long as one was a 02 then it would count as vacant (this would cover a scenario for example where the site was vacant but premises were unsafe - both pieces of information are useful, a second example would be vacant and no access).	
		Impact on Organisation's Systems and/or Processes? Yes	

		Capacity in which Organisation is impacted LDSO	
		Impact on Organisation Processes	
G4S AccuRead	No	The correct codes should be used instead of allowances made for bad practice/	No
British Energy Direct Limited	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? Supplier Impact on Organisation? Process changes Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?	Yes
Scottish Power	Yes	Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No	No
TMA Data Management Ltd	No	Some standardisation is required for the additional info in case of SVC20 for LTV  We believe that use of the Additional Information Field should only be on an exceptional basis and as an absolute last resort - as the use of such a free text field more or less precludes any automatic processing; and therefore introduces manual work, costs, human error and wide, hard to control, manage or audit discretionary decision making. We note that in the past SVG has rejected CPs that resort to use of the Additional Information Field on exactly this basis.  This CP can only work if some standardisation of additional comments for LTV is introduced otherwise it will be open to interpretation as to what is additional.	No
		introduced, otherwise it will be open to interpretation as to what is additional information that is suitable alongside an SVC of 20 to start the LVT process. It would also be very useful for Supplier, who would like to introduce automation of this process.	
Scottish and Southern Energy	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? NHHDC, Supplier Impact on Organisation? Significant changes to our system and processes. Extra resourcing requirements.	Yes
		<b>Additional comments:</b> Due to our current IT scheduling, it will not be possible for us meet the proposed implementation date.	
E.ON	Yes	Capacity in which Organisation is impacted? Supplier	Yes

NORW, EELC, ENG, EMEB, PGEN		Impact on Organisation? Systems / process	
E.ON Energy Services Limited	Yes	Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes	Yes
		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) NHHDC	
		Impact on Organisation (e.g. systems/process changes) none	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
		<b>Comments</b> : From our prospective we support this to in preference to 1304 as realistically we have scenarios which differentiate between 02 and 20 depending on the meter reader's assessment of the state of the property at the time of the visit.	
NPower Limited	yes	Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) Yes	Yes
		Capacity in which Organisation is impacted Supplier	
		Impact on Organisation (e.g. systems/process changes) System and Process	
		Would implementation in the proposed Release have an adverse impact? No	

No Comments on redline text

# CP1306 - Removal of second criterion for identifying a site as Long Term Vacant (LTV)

#### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement	
Central Networks	LDSO	No		
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	N/A	
GTC	LDSO	Neutral		
Gemserv	MRASCo Ltd	Neutral		
EDF Energy	Supplier, NHH Agents, HH MOP	No		
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes	30	
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes		
G4S AccuRead	NHHDA, NHHDC, NHHMOP, HHMOP	Yes	0	
British Energy Direct Limited	Supplier	Yes		
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0	
TMA Data Management Ltd	HHDC, HHDA, NHHDA	Yes		
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	15	
E.ON	Supplier	Yes		
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes		
E.ON Energy Services Limited	NHHDC MOA	Yes	0	
NPower Limited	Supplier, Supplier Agents	Yes	180	

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Central Networks	No	In many cases the meter will still be accessible even if a site is vacant, for example where the meter is in an external box. In these instances, we believe the meter should still be read to confirm no consumption in the interim period.	No

		Impact on Organisation's Systems and/or Processes? No	
		Capacity in which Organisation is impacted: LDSO	
		Impact on Organisation : None	
		Would implementation in the proposed Release have an adverse impact? N/A	
Independent Power Networks Limited	Yes	Impact on Organisation's Systems and/or Processes? No	No
GTC	Neutral	Impact on Organisation's Systems and/or Processes? No	No
EDF Energy	No	The fact that Suppliers are ignoring this test, or assuming it is satisfied by a Site Visit Check Code of 02 is a blatant misuse of long term vacant process. This does not mean an appropriate way forward should be to remove test it means that better adherence to full rule set is required and increase examination of these MPANs must be undertaken by Elexon to ensure Suppliers are not misusing this process.  Just because site is classed as vacant it does not mean a meter cannot be read and Suppliers must be able to show that they have made every effort to also determine that meter cannot be read before entering as long term vacant. Change suggests Suppliers are using Site Visit Check Code 02 as a sufficient test for meter being unable to be read should have all such MPANs removed from long term vacant process until they can provide meter cannot be read. To prove a meter is not readable they would need to ensure that their meter readers add such details as additional information when using site visit check code 02 for a site to be valid for this process. Elexon's role here should be to ensure settlement integrity and not to allow loopholes in processes and non conclusive information to sway decisions on long term vacant sites.  Impact on Organisation's Systems and/or Processes? No Impact on Organisation: We do not currently use this process so change will have no impact.	
IMServ Europe	Yes	These are a sensible set of changes.  Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation: Procedural changes only	
		Implementation: 30	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
British Energy Direct	Yes	Impact on Organisation's Systems and/or Processes? No	No
	1		

Limited		Would implementation in the proposed Release have an adverse impact?  No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?		
Scottish Power	Yes	Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No	No	
Scottish and Southern Energy	And Southern  Yes Impact on Organisation's Systems and/or Processes? No Capacity in which Organisation is impacted? NHHDC, Supplier Impact on Organisation? Minor procedural changes		No	
.ON Yes No additional comments.		No		
E.ON Energy Services Limited	Yes	Impact on Organisation's Systems and/or Processes? (Please delete as appropriate) No  Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)	No	
		NHHDC		
NPower Limited	Yes	Impact on Organisation's Systems and/or Processes? Yes  Capacity in which Organisation is impacted Supplier  Impact on Organisation (e.g. systems/process changes) System and Process Changes  Would implementation in the proposed Release have an adverse impact?	Yes	

No comments on redline text

# <u>CP1307 - Minor Changes to the Long Term Vacant Site Process</u>

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Central Networks	LDSO	Yes	

Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	N/A
GTC	LDSO	Neutral	
Gemserv	MRASCo Ltd	Neutral	
EDF Energy	Supplier, NHH Agents, HH MOP	Yes	
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes	30
EDF Energy Networks (EPN,LPN,SPN)	LDSO, SMRS, UMSO	Yes	
EDF Energy (IDNO) Ltd			
G4S AccuRead	NHHDA, NHHDC, NHHMOP, HHMOP	No	90
British Energy Direct Limited	Supplier	Yes	30
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	30
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	15
E.ON	Supplier	Yes	
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	120
E.ON Energy Services Limited	NHHDC MOA	Yes	30
NPower Limited	Supplier, Supplier Agents	SEE Comments	180

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Independent Power Yes Networks Limited		Impact on Organisation's Systems and/or Processes? No	No
GTC Neutral		Impact on Organisation's Systems and/or Processes? No	No
EDF Energy Yes		<b>Comments:</b> With regard to point 3 we do not feel that this should be an optional process if date for initial deemed read has yet to pass RF. Withdrawing and replacing such reads would seem to be better for maintaining settlement accuracy and as such should be mandated.	

		Impact on Organisation: We do not currently use this process so change will have no impact.	
IMServ Europe	Yes	These are a sensible set of changes.	
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation: Procedural changes only	
		Implementation: 30	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
G4S AccuRead	No	These minor changes affect a great deal of the LTV process and some of it seems like a waste of time and effort to change it. Overall the whole CP should be re-considered.	
		<ol> <li>The change is sound in principle but should also consider that only site reads that are taken after the LTV initiation date should cause a stop to the LTV process.</li> </ol>	
		<ol><li>I must have misunderstood this section as it appears to pointlessly describe the already functioning EAC/AA calculation process?</li></ol>	
		The change is sound in principle but there should be no reliance placed on the supplier to initiate the fixing of these reads.	
		Impact on Organisation's Systems and/or Processes? Yes	
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation (e.g. systems/process changes) Process changes would be required to initiate monitoring and replacing LTV reads as per solution part 3	
		Implementation 90	
British Energy Direct Limited	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? Supplier Impact on Organisation? Process changes Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?	Yes
Scottish Power	Yes	Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only	No

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		Would implementation in the proposed Release have an adverse impact? No	
TMA Data Management Ltd	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted NHHDC Impact on Organisation Process How much Implementation Notification is required from receipt of approved redline text changes?  30	Yes
Scottish and Southern Energy	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted Supplier, NHHDC Impact on Organisation Minor procedural changes	Yes
E.ON	Supplier	Capacity in which Organisation is impacted? Supplier / NHHDC	Yes/No
		Impact on Organisation? Systems / process	
		Other comments: E.ON think that clarity is needed, as the change supposes that an LTV deem cannot be withdrawn under current rules. It would appear that withdrawal of an LTV deem is possible under normal circumstances, subject to the fluidity of the data.	
Siemens Metering Services	Yes	Impact on Organisation's Systems and/or Processes? Yes	
erennene merennig eer mee		Capacity in which Organisation is impacted)  NHHDC	
		Impact on Organisation (e.g. systems/process changes) Complex process changes would be required to facilitate the 3rd solution.	
		How much Implementation Notification is required from receipt of approved redline text changes? 120	
		<b>Comments:</b> We would need a minimum of 4 months to implement the 3rd solution of this CP.	
		Would implementation in the proposed Release have an adverse impact? (please state impact)	
		Please provide details of the associated costs on your organisation to implement the change. (If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision only please indicate accordingly).	
		Costs are unknown at this time, as they would be impacted by any increase in	

	Supplier requests to change readings (in relation to part 3).	

E.ON Energy Services	Yes	Impact on Organisation's Systems and/or Processes? Yes	Yes
Limited		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation (e.g. systems/process changes) Manual Process change only	
		How much Implementation Notification is required from receipt of approved redline text changes?	
		No. of Calendar Days 30	
		<b>Comments</b> Training Material and roll-out. Work alongside supplier on how they would send work stream through.	
		Would implementation in the proposed Release have an adverse impact? (please state impact) ${\sf No}$	
		Comments: New Manual process to work this	
NPower Limited	Yes Solution 2. No Solution 1&3	We believe these solutions should be split into 3 different Change Proposals and not combined.	
		<b>Solution 1</b> – Reject this Solution - The Long Term Vacant (LTV) process should be based on clearly defined data items. Even though the (J0040) 'Register Reading' is synonymous with "Meter Reading", it is preferred that the reference remains to the process INPUT rather than the process Output. This would avoid any potential confusion with any reference to 'estimated' meter readings (e.g. within the supplier's billing system).	
		<b>Solution 2</b> – Agree that section 4.15.5 should be amended to state the end date for a Long Term Vacant Period should be the date before the date of the Meter reading obtained to end the period.	
		<b>Solution 3</b> – Reject this Solution - With reference to the proposed text (3.3.8.4.1) (red-line version) the action stated is "Send notification that the deemed initial meter	

register reading(s) at the start of the Long Term Vacant period is incorrect. Instruct whether or not to replace the withdrawn reading with the reading taken at the end of the Long Term Vacant Period, in accordance with Appendix 4.5"

It is proposed that a consistent approach should be applied if it was felt that the deemed initial meter reading for the Long Term Period was incorrect. For example alter the text for 3.3.8.4.1 to

"Send notification that the deemed initial meter register reading(s) at the start of the Long Term Vacant period is incorrect. Instruct whether or not to replace the withdrawn reading with the reading taken at the end of the Long Term Vacant Period, in accordance with Appendix 4.5"

This change proposal does not provide enough clarity as to how the NHHDC would handle an instance involving crystallised data and seek more clarity.

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, NHHDC

**Impact on Organisation** (e.g. systems/process changes) System and Process Impact

How much Implementation Notification is required from receipt of approved redline text changes?

No. of Calendar Days 180

**Comments** Would implementation in the proposed Release have an adverse impact? (please state impact) No

#### Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/C oPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	
1	E.ON Energy Services	BSCP504	4.5.2 RED TEXT	MEDIUM	The term "INITIAL reading" can be interpreted as two different things

	Limited			INITIAL reading type or
		INITIAL READING at the start of the LTV Process		INITIAL READING at the start of the LTV Process
				The use of different terminology could be used (Read at start of LTV Process etc)
2	E.ON Energy Services Limited	4.15.1	HIGH	Does not contain changes for code 20 with additional information?

## CP1308 - Changes to Long Term Vacant Site process where a reading is obtained via a warrant

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Central Networks	LDSO	Yes	
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	N/A
GTC	LDSO	Neutral	
EDF Energy	Supplier, NHH Agents, HH MOP	Yes	
IMServ Europe	HHDC, DA and MO NHHDC, DA and MO	Yes	30
EDF Energy Networks (EPN,LPN,SPN)	LDSO, SMRS, UMSO	Yes	
EDF Energy (IDNO) Ltd	NHHDA, NHHDC, NHHMOP, HHMOP	Yes	90
G4S AccuRead	WITTER, WITTER, WITTINGT, THINGT	163	70
British Energy Direct Limited	Supplier	Yes	
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	15
E.ON	Supplier	Yes	
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	
E.ON Energy Services Limited	NHHDC MOA	Yes	90
NPower Limited	Supplier, Supplier Agents	No	6 Months from Panel Agreement

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Independent Power Networks Limited	Neutral	Impact on Organisation's Systems and/or Processes? No	No
GTC	Neutral	Impact on Organisation's Systems and/or Processes? No	No
EDF Energy	Yes	Impact on Organisation: We do not currently use this process so change will have no impact.	No
IMServ Europe	Yes	These are a sensible set of changes.	
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation: Procedural changes only	
		Implementation: 30	
		Would implementation in the proposed Release have an adverse impact? (please state impact) No	
G4S AccuRead	Yes	Impact on Organisation's Systems and/or Processes? Yes	
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation Changes in processing Warrant reads and Deemed LTV reads	
		Implementation: 90 days	
British Energy Direct Limited	Yes	Impact on Organisation's Systems and/or Processes? No	No
		Would implementation in the proposed Release have an adverse impact?  No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?	
Scottish Power	Yes	Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No Other comments: The solution identified within CP1308, reflects the Scottish Power	No

		view in the response to DCP0044.	
Scottish and Southern Energy	Yes	Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted Supplier, NHHDC Impact on Organisation Minor procedural changes	Yes
E.ON	Yes	Capacity in which Organisation is impacted? Supplier / NHHDC	Yes
		Impact on Organisation? Systems / process	
E.ON Energy Services Limited	Yes	Impact on Organisation's Systems and/or Processes? Yes	Yes
		Capacity in which Organisation is impacted NHHDC	
		Impact on Organisation Possible system changes or Manual	
		How much Implementation Notification is required from receipt of approved redline text changes?	
		No. of Calendar Days 90	
		Comments Depending on clarification of below	
		This change would be most efficient if the Supplier was able to send a withdrawn D10 reading to remove our deemed reading that is generated to start LTV and then replace with a relevant reading, failing this our system will need to be amended in some way to allow a D4 / D52 and replacement reading to be processed automatically on the same date.	
NPower Limited	No	The rationale for the change proposal is based on the site being vacant in the period from the warrant read, and the date of the next D0004 (with the 02 SVCC).	Yes
		In reality, in that particular period, there is a possibility that the site could be 'occupied', then 'not occupied' (without the supplier's knowledge).	
		According to the change proposal, the previous warrant read would be used in settlement, rather than a deemed read (relating back to the date of the first D0004 SVCC 02). In this situation, settlements would be under-recording consumption used at site.	
		To overcome the 'decision-making consideration' was the site occupied or not between the warrant read date and the date of the first D0004 SVCC 02, a different	

approach could be taken – by altering the criteria for the end date for the Long Term Vacant Period.

Currently 4.15.5 (2) states "where a meter reading has been obtained, the date that the meter reading was obtained should be used as the end date for the Long Term Vacant Period."

If during the warrant visit, it was considered that the site was vacant, then the warrant reading should not be used to end the Long Term Vacant period. (This could be entered as a footnote to 4.15.5 (2)).

A 'warrant read vacant premises' meter reading type category could be introduced.

Furthermore, additional action could illustrated within the appendices to remove the fuse (that is, 'de-energise' the meter), which would add a further control to prevent any mis-recording within settlements.

As per our response to DCP 44 the proposed solution would cause read failures in our NHHDC system (Zero Consumption Check). To rectify this, IS costs are likely to be significant due to the amount of regression testing required. There is no Business Justification for this Change Proposal as we believe the number of incidents where a warrant is obtained for access to a long term vacant site is very small.

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

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, NHHDC

**Impact on Organisation** (e.g. systems/process changes) System and Processes

How much Implementation Notification is required from receipt of approved redline text changes?

No. of Calendar Days 6 Months from Panel Agreement

**Comments** Due to the amount of regression testing and system impacts we

	would be unable to meet the February Release 2010 for this change.	
	Would implementation in the proposed Release have an adverse impact? (please state impact) Yes	

No comments on redline text