CPC00642 – Impact Assessment Responses for CP1250, CP1251, CP1252, CP1253, CP1254, CP1255, CP1256, CP1257, CP1258, CP1259, CP1260 and CP1261.

CP1250 - Increase opportunity to update the NMTES

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Central Networks	Distribution	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
United Utilities	-	✔
RWE NPower	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔
Electricity North West Ltd	LDSO	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	X
CE Electric		Neutral
EDF	Supplier, NHH Agents and HH MOP	Neutral
Western Power Distribution	LDSO, MOA,	Neutral
TMA Data Management Ltd	HHDC, HHDA, NHHDA	Neutral

Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Central Networks	✔	**Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service – please provide rationale to support your view?** Yes. As the sponsor of this CP I believe all supporting details have already been provided. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs you believe is most appropriate?** Yes. As the sponsor of this CP I believe all supporting details have already been provided. **Would implementation in the proposed Release have an adverse impact?** No	X	30
ScottishPower	✔	**Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service?** ScottishPower agree that the sample should be based on all test records as this should assist in reducing the number of Technical Assurance Non-	X	-

		Compliances against LDSOs. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs you believe is most appropriate?** ScottishPower agree that the number of VTs in the sample should be reduced. As there are a greater number of CTs in use compared to VTs it makes sense that the number of samples taken is proportional. **Impact:** Internal processes impacted. **Comments: ScottishPower support the suggested inclusion of CP1250 in the February 2009 Release.**		
Scottish and Southern Energy	✔	Agree in principle. **Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service – please provide rationale to support your view?** We believe this should be based on all records as the numbers of certificates available for off-circuit instruments are very limited. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs you believe is most appropriate?** We are not sure of the actual numbers that should be sampled. Will 10 be enough? Why/how was the figure of 50 arrived at, originally?	x	0
United Utilities	✔	-	X	0
RWE NPower	✔	Implementation Date should say 2009	x	0
E.ON UK Energy Services	✔	We would strongly support this proposal as an expansion of the data held within the NMTES should lead to a reduction in the	✔	-

Limited		number of TAA non compliances being raised and also facilitate the reduction in the number of outstanding non compliances. This in turn would enable a better analysis of remaining non compliances to identify any underling trends. **Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service** – please provide rationale to support your view? We agree that all suitable test records should be utilised as this will give the greatest opportunity for matching MT found on site and thus avoiding the generation of unnecessary non compliances. This will also significantly increase the likelihood of being able to resolve outstanding non-compliances. In addition the calculations for overall accuracy will be improved. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs you believe is most appropriate?** We believe that the sample size should be reduced from the current level of 50 to a new minimum of 10 examples as the population of VTs is much smaller than the population of CTs. This sample size will be sufficient to minimise the effects of individual variances as any one variance will contribute only 10% to the overall variance. At the same time the sample size is sufficiently small to allow sufficient records to be identified for each transformer type. Impact: HHMO - Changes would be required to procedures.		
E.ON	✔	E.ON is keen to support this change.	x	-

Association of Meter Operators	✔	Implementation should be as soon as possible to allow submission and approval of information. The implementation is a documentary change to the BSCP. **Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service – please provide rationale to support your view?** Test records. Measurement transformers are generally removed from circuit when they have failed – normally fatally failed - so there is little opportunity to test working items removed from circuit. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs you believe is most appropriate?** Yes. There are fewer VTs in use across the industry than CTs from which to draw sample data	X	-
Electricity North West Ltd	✔	**Do you agree that the sample should be based on all test records or limited to those that have recently been removed from service – please provide rationale to support your view?** Agree – Transformer errors are not expected to change over time. Agree – Transformer errors are not expected to change over time. time. **Assuming the sample is based on all test records, do you agree that the number of VTs in the sample should be reduced – please provide rationale to support your view and quantitative evidence to support the number of VTs**	X	-

		you believe is most appropriate? On the basis that any data is likely to be better than no data, a reduced sample size would be acceptable. We have no quantitive evidence as to the appropriate number of units, but clearly the higher the number the more representative the result.		
British Energy Trading and Sales Limited	X	Suggested proposed solution to 'submit a minimum sample of 50 CT or 10 VT errors obtained from test records' is too vague as it is unclear as to where the 'test records' were obtained from or how old these 'test records' are and therefore greater clarification is required.	-	-
CE Electric	Neutral	Neutral	X	-
EDF Energy	Neutral	-	X	0
Western Power Distribution	Neutral	We don't currently the NMTES due to the difficulty in finding 50 of the same type and the relatively low number of non-compliances it would resolve. Reducing the number to 10 will not change what we do so we neutral on this change	X	0
TMA Data Management Ltd	Neutral	**-**	X	-
Siemens Metering Services	Neutral	-	-	-
AccuRead LTD	Neutral	No Impact	x	0

CP1251 - Inferior / Inappropriate Peripheral Devices shall not be used to Collect Automatic Meter Readings

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
RWE NPower	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔
Stark Software Ltd	HHDC HHDA and HHDR	✔
Imserv		✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
United Utilities	-	✔
CE Electrics		Neutral
EDF Energy	Supplier, NHH Agents and HH MOP	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✔	-	X	0
ScottishPower	✔	**Capacity in which Organisation is impacted:** Supplier, MOA, LDSO, NHHDC, NHHDC, HHDC, NHHDA **Impact on Organisation:** Minor internal documentation	✔	60
TMA Data Management Ltd	✔	**-**	X	-
Scottish and Southern Energy	✔	**-**	-	0
AccuRead LTD	✔	We would agree with a move to bring this requirement into the market regulations to avoid any possibility of systematic error being entered into settlements. **Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)** NHHMO, NHHDC, NHHDA **Impact on Organisation** (e.g. systems/process changes) No Impact **Would implementation in the proposed Release have an adverse impact? (please state impact)** February 2009 would be an appropriate implementation date	X	-
RWE NPower	✔	Implementation Date should say 2009	X	-
E.ON UK Energy Services Limited	✔	**It is essential that the industry can have confidence in the information entered into settlements.**	X	-

		Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) NHHMO. **Impact on Organisation (e.g. systems/process changes)** Our existing metering solutions comply with these requirements		
E.ON	✔	**-**	X	-
Association of Meter Operators	✔	This change will make the settlement requirements for obtaining metering more explicit. It is important that readings entering settlement align with metrological register displayed to the customer and legally the register for which is 'used for trade'. Use of pulse counters leads to further opportunity for error.	X	-
Stark Software Ltd	✔	-	-	-
Imserv	✔	-	X	0
British Energy Trading and Sales Limited;	✔	**-**	-	-
United Utilities	✔	**-**	X	-
CE Electric	Neutral	-	-	N/A
EDF Energy	Neutral	We agree with principle of this change but feel that it cannot be supported currently fully within the market and as such change is not complete. **Comments:** At present we do not see how this change can be supported in the market. Firstly, DCs are not going to be aware of how metering is configured, it will be MOPs that need to ensure that remote readings can only be taken via a compliant mechanism that is interrogated remotely. Also there are no flows that support provision of this information	X	0

		from a MOP to a DC, and potentially on to a DR, to enable NHH meters to be read remotely. Surely this is a major barrier to enabling smart meters to be fully operational under competitive market.		

Comments on Redlined Text

No.	Organisation	Section	Comment
1	**EDF Energy**	CoP8 and CoP9 Location (Section and paragraph numbers) 2 Severity Code (H/M/L – see below): M	Should new SI be detailed in this section is same method as those Statutory Instruments that are already included in these documents for consistency.
2	**E.ON UK Energy Services Limited**	Cop 8 M	It is suggested that consideration should be made to including a process to ensure that data passed from the outstation is not compromised.

CP1252 - Reading Submission Frequency for remote meter readings

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
EDF Energy	Supplier, NHH Agents and HH MOP	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔
Stark Software Ltd	HHDC HHDA and HHDR	✔
Imserv		✔
CE Electric		Neutral
Western Power Distribution	LDSO, MOA,	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
EDF Energy	✔	We feel that new appendix 4.20 for BSCP 504 is badly worded. There have been two different interpretations internally of what it is actually saying. One view is that it is forcing NHHDCs to ensure reads are entered in periods of under three and one month apart depending upon profile class and ignoring any agreements made between Supplier and NHHDCs to align collection to billing windows and not a single point in time. Second view is that this is saying if you have reads that are more frequent than quarterly or monthly then you do not have to enter all into settlements but you should make sure that reads are entered so there is no more that three or one month between such reads. Majority view is that this second view is that which Elexon mean to cover. **Capacity in which Organisation is impacted**: NHHDC **Impact on Organisation:** A new process will need to be introduced for remotely read meters that prevent all routine reads being used in settlements where collection is done at a frequency significantly higher than required by profile class. **Would implementation in the proposed Release have an adverse impact?** We assume that a February 2009 implementation is being suggested. There is no way that this change could be introduced in this timeframe but we do not believe that there would be significant meters introduced by then to make this a major problem if we had to process all readings sent to us as NHHDC.	✔	180
ScottishPower	✔	It is believed that there should be some provision of a few	X	

		days either side of the 1 month and 3 months gap (e.g. 40 days and 100 Days). This will ensure there is no technical non-compliance when the meter read changes from the 15th of each month to the 20th**.** **Impact on Organisation:** Document Changes Only		
TMA Data Management Ltd	✔	It is important to adapt the relevant BSC to cope with Smart Metering, the submission of reads every 3 months or every month depending on the PC is the best way forward to deal with an increase in read frequency thanks to changes in technology. **Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)** NHHDC (on going qualification process) **Impact on Organisation** (e.g. systems/process changes): System and processes	✔	60
British Energy Trading and Sales Limited	✔	-	-	-
Scottish and Southern Energy	✔	-	x	0
Siemens Metering Services	✔	**Capacity in which Organisation is impacted:** NHHDC & NHHDA **Impact on Organisation**: System and process changes required. **Comments** Typing error in the above proposed implementation date, states it as Feb 08. Assuming this should be Feb 09, the timescale for this will be very tight. Would implementation in the proposed Release have an adverse impact? (please state impact) The timescales for implementing this in the February 09 Release will be very	✔	90

		tight.		
AccuRead LTD	✔	As a large NHHDA superfluous readings could have a significant impact on our performance and maintenance costs. **Capacity in which Organisation is impacted** NHHDC, NHHMO, NHHDA **Impact on Organisation** This change would be considered as part of the specification for the data processing aspect of AMR within AccuRead **Would implementation in the proposed Release have an adverse impact? (please state impact**) February 2009 would be an appropriate implementation date **Other Comments:** We believe it is important to point out that the Meter Advance Periods will have to be calculated only between the readings used for settlement, otherwise settlement gaps might be created.	✔	0
RWE NPower Limited	✔	Implementation Date should say 2009	X	-
E.ON UK Energy Services Limited	✔	It would appear that this is a suitable approach. **Impact:** Changes will be required to ensure that only an appropriate number of readings are entered into settlements	✔	
E.ON	✔	E.ON welcomes this change if it improves overall data quality. **Impact:** Supplier There are optional system changes depending on whether we want to be selective about which reads to send to	✔	

		Settlements.		
Association of Meter Operators	✔	A pragmatic solution, which can be changed in the future if there is a cost/benefit to the industry.	X	-
Stark Software Ltd	✔	-	-	-
Imserv	✔	-	X	0
CE Electric	Neutral	Data Collectors should be making all effort to process all received readings. It could be a better solution to impose a percentage processed i.e they must process 98% of readings taken or at least the minimum number required in the timescales.	X	N/A
Western Power Distribution	Neutral	-	X	0

CP1253 - Remote Reading Assurance

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔
EDF Energy	Supplier, NHH Agents and HH MOP	X
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	X
Stark Software Ltd	HHDC HHDA and HHDR	X
Imserv		x

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✔	-	X	-
ScottishPower	✔	**Impact on Organisation:** Document Changes Only	X	0
TMA Data Management Ltd	✔	It is important to adapt the BSCP to cope with changes in technology Capacity in which Organisation is impacted: **NHHDC (on going qualification process)** **Impact on Organisation (e.g. systems/process changes):** System and processes	✔	60
Scottish and Southern Energy	✔	-	X	0
Siemens Metering Services	✔	**-Capacity in which Organisation is impacted**: NHHDC **Impact on Organisation** Process and potential system changes required **Would implementation in the proposed Release have an adverse impact?)** Again, the timescales for implementing this in the February 09 Release will be tight.	✔	90
AccuRead LTD	✔	We agree with the changes laid out for read assurance, however we believe that the reference to "the NHHDC's" time being set to UTC once per day should refer to the equipment/system communicating with any AMR meter being set to UTC once per day. **Capacity in which Organisation is impacted** NHHMO, NHHDC **Impact on Organisation** AccuRead will need to make minor	✔	30

		amendments to the processes for collecting AMR readings **Would implementation in the proposed Release have an adverse impact? (please state impact)** Some time would be required in order to achieve full compliance, February 2009 would be an appropriate implementation date		
RWE NPower Limited	✔	Implementation Date should say 2009 Agree with the addition of UTC in section 1.2 Section 4.2 - Validate meter date: Add "or retrieved remotely" to requirement 1 so it reads" Check that where data is collected at site, or retrieved remotely, the Meter serial number for the MSID is the same as the serial number provided by the MOA for that MSID". This is an important check at the point of first contact in HH and is one way in which assurance can be provided that the meter being read is the one intended to be read. We believe this should be mandated	X	-
E.ON UK Energy Services Limited	✔	This change will give assurance as to the quality of data entering into settlements. **No impact: .** NHHDC No impact as current systems are compliant	X	
E.ON	✔	E.ON's current systems are compliant	x	-
Association of Meter Operators	✔	**-**	X	-
EDF Energy	X	**Disagree:** Changes with regard to section 1.2.1 of BSCP 504 cannot be compiled with when a reading is made remotely. All agent can do is poll the data from the meter in manner instructed by MOP, although there is no flow to inform DC of that mechanism. With that in mind all NHHDCs would be non-compliant with BSCP 504 and as such we do not see how those changes related to section 1.2.1 can be agreed. Within the	✔	-

		redlined changes point (b) can never be assured and as such agent taking such a read will be non-compliant. This is second time we have raised this comment on this change and are disappointed that Elexon seem to be unable to realise that this point is impossible for any agent collecting data remotely to comply with. **Impact on Organisation:** Impact will be on NHHDC being non-compliant with BSCP 504 as section 1.2.1 (b) is impossible to comply with when readings are taken remotely.		
British Energy Trading and Sales Limited	X	In agreement of all of the proposed except the re-order of precedence, as the proposed solution removes the order of precedence. The ideal solution would be to include a AMR read code for J0171 'reading type' which would clearly identify any D0010s submitted direct from the AMR or retain order of precedence removing 'remotely'.	-	-
Stark Software Ltd	x	**Disagree:** HHDR Significant issues if adopted in its entirety. See below This CP does not address the possibility of Inbound Communications (by requiring a time check and possible trim to with 20 seconds on each 'interrogation'). NHHDCs are not currently required to check meter times and outgoing D0010 readings are expressed in terms of date only. This requirement seems to be unnecessarily onerous and out of step with previous practise. There are no references to Clock time or GMT. There seems to be a conflict between the requirement to submit readings logically unchanged, but also to be the same as those on the visible dial. There needs to be recognition that truncation of remotely collected leading digit may be required	✔	Unknown
Imserv	X	**Disagree:** The date and time check needs to be clarified. In the HH Market the time can be forward or back as long as the	✔	90

		difference is within a defined boundary. If below the boundary no reset is required, if above an issue should be raised with the MOP (currently this is 20 seconds to 15 minutes). The NHH check proposed incorporates time and date validation, making for a more stringent check than that in Half Hourly. As NHH process only use dates, this check, if required, should only incorporate date validation. It is not clear whether the additional cost in implementing and running processes to monitor and reset times on individual NHH meters would provide enough benefit to justify the change. Is there going to be consideration of updates to the Codes of Practice to reflect these requirements, or is the expectation that the accuracy of the check will reflect the existing CoP? Is it also possible that, depending on the Settlement Configuration, a meter might be in GMT or clock time, adding further complexity to the checks required by the data retriever? The document also proposes implementing the change for manually read meters. Again, the processes and checks in place currently should be sufficient to identify any inaccuracies with individual MPANs. **Impact:** NHHDC **Would implementation in the proposed Release have an adverse impact? (please state impact)** Yes. Additional cost and processing effort.		

Comments on Redlined Text

No.	Organisation	Section	Comment
1	AccuRead LTD	BSCP50 Section 1.2.1 Severity M	The specification that the NHHDC's time should be aligned with UTC once per day should refer more specifically to equipment/systems used to retrieve readings from AMR meters.

CP1254 - Prevention of Unauthorised Access to Smart Meters and Automated Meter Readings (AMR)

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
CE Electric		✔
EDF Energy	Supplier, NHH Agents and HH MOP	✔
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔
Stark Software Ltd	HHDC HHDA and HHDR	✔
Imserv		✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	X

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electric	✔	**Agree** on the basis that this change will support and encourage accurate settlement data.	X	-
EDF Energy	✔	**Agree**: We do not feel that this change examines this issue in sufficient detail. Main issue we have is with regard to change of Supplier. When winning a meter that can be programmed remotely it is possible that we would want to ensure that from SSD meter is configured to meet requirements of our customer offering. This means we would need to access meter prior to SSD to set up that configuration. It also gives rise to an issue regarding change of Supplier readings as configurations are likely to be different in so far as that information collected by new Suppliers agents are likely to be unusable by old Supplier and their agents. We see this as a potential significant settlement problem that is being ignored at present.	X	0
Western Power Distribution	✔	-	X	-
ScottishPower	✔	**Impact on Organisation:** Document Changes Only	X	-
TMA Data Management Ltd	✔	**-**	X	-
Scottish and Southern Energy	✔	-	X	0
AccuRead LTD	✔	-	X	-
RWE NPower Limited	✔	**Implementation Date should say 2009** Agree additional wording to CoP8 and 9. Still would like clarification of what the impact PSL100 additional wording will have on other agents - particularly does "Metering	X	-

		System" include "Equivalent Meter" as defined in BSCP520 for Unmetered Supplies - PSL100 is generic and therefore impact assessment on the implications of this change is with all agents not just Suppliers and NHH agents seeking to progress AMR in NHH.		
E.ON UK Energy Services Limited	✔	We support this change as there is clearly an industry requirement to prevent unauthorised remote access to metering systems, at the same time the proposed changes allow participants flexibility in how this security is achieved. **Impact**: NHHMO NHHDC All our remote metering solutions include security protocols	X	
E.ON	✔	Comments provided by Energy Services	X	-
Association of Meter Operators	✔	-	-	-
Stark Software Ltd	✔	-	X	-
Imserv	✔	Is the expectation that this would form part of the protocol or meter approval process? If so, what is the expectation for meters already in use for NHH installations? Is there expected to be a retrospective approval process for these meter types?	x	0
British Energy Trading and Sales Limited;	X	The proposal should include prevention of unauthorised access to the meter itself as well as prevention of unauthorised access to the meter reading data to therefore 'minimising the risk that Settlement data could be changed through malicious activity'.	X	-

Comments on Redlined Text

No.	Organisation	Section	Comment
1	**EDF Energy**	CoP8 and CoP6 Location (Section and paragraph numbers) 6.1 Severity Code (H/M/L – see below) - M	In both documents statement is “All programmable meters…”. There are currently many programmable meters installed that cannot be remotely interrogated. We feel that this needs to be reworded to read “All meters that can be programmed without the need for a site visit.
2	**TMA Data Management Ltd**	CP1254_Attachment_C_PSL100_redlined_v0.2.pdf Section 5.5.2	Could change “is not changed through malicious activity” to is not changed accidently or through malicious activity”

CP1255 - Service Descriptions and other CSD Inconsistencies

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
EDF Energy	Supplier, NHH Agents and HH MOP	✔
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
CE Electric		Neutral
TMA Data Management Ltd	HHDC, HHDA, NHHDA	Neutral
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	Neutral
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
EDF Energy	✔	-	X	0
Western Power Distribution	✔	-	X	-
ScottishPower	✔	**Comments**: ScottishPower agree that the service documentation should be consistent, and that these changes are required. **Capacity in which Organisation is impacted:** Generator **Impact on Organisatio**: Manual change **Would implementation in the proposed Release have an adverse impact**? No	✔	5
Scottish and Southern Energy	✔	**-**	X	0
RWE NPower Limited	✔	**-**	X	-
E.ON UK Energy Services Limited	✔	This is fundamentally a housekeeping change	-	-
E.ON	✔	-	X	-
CE Electric	Neutral	-	X	-
TMA Data Management Ltd	Neutral	**-**	-	-
British Energy Trading and Sales Limited	Neutral	**-**	-	-
Siemens Metering Services	Neutral	**-**	-	-
AccuRead LTD	Neutral	**-**	X	-

CP1256 - Action on Backdated D0052 flows

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Central Networks	Distribution	✔
Western Power Distribution	LDSO, MOA,	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
Electricity North West Ltd	LDSO	✔
CE Electric	UMSO	See comments
EDF Energy	Supplier, NHH Agents and HH MOP	X
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	X
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	X
E.ON	Supplier, Shipper	X
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Central Networks	✓	**Would implementation in the proposed Release have an adverse impact?** None	X	30
Western Power Distribution	✓	**Happy with the redlined changes that have bee made but on BSCP504 attachment the line under BSCP504 section 4.12; should this say "**In populating the D0052 flow, the Supplier or UMSO will:- **Capacity in which Organisation is impacted:** UMSO **Impact on Organisation:** Minor procedure change	✓	30
TMA Data Management Ltd	✓	**Capacity in which Organisation is impacted:** HHDC (on going qualification process) **Impact on Organisation:** System and processes	✓	60
British Energy Trading and Sales Limited	✓	Though please note comments listed below (redlined text)	-	-
Scottish and Southern Energy	✓	-	X	-
RWE NPower Limited	✓	We agree with the proposal as this is how we would currently treat D0052s, however we would just like to clarify that the requirement is on the supplier to ensure that the earliest effective from date on back dated D0052s is set to a date for which RF has not taken place and that there isn't a requirement on the NHHDC to check for this and not to process if the date is earlier than this Does this apply for all D0052s or just those for UMS?	✓	180

		Changes are to BSCP504 which doesn't just cover UMS		
E.ON UK Energy Services Limited	✔	The proposed changes will provide clarity for NHHDCs **Impact:** NHHDC - Some system changes will be required to automate process.	X	-
Electricity North West Ltd	✔	This scenario doesn't often occur but from time to time it maybe necessary to back date an EAC value for an Unmetered supply. In these circumstances it would seem sensible to send a D0052 to the supplier and NHHDC re-affirming all the system settlement data.	X	-
CE Electric	See Comments	**On receipt of backdated D0052, NHHDCs should overwrite all previous data (including EACs) for that metering system** – Agree change. **If a supplier or UMSO does not wish to overwrite previously supplied data, they must resend the appropriate D0052s in the correct order** – Agree change. **A D0052 backdated over 14 months must be amended by the Supplier or UMSO to the earliest effective date for which a final Reconciliation Run has not taken place** – Disagree with change. There are no timescales on the NHHDC for processing the D0052s therefore the date that the UMSO provides in the D0052 may expire and the D0052 become invalid. This would result in rejections and the D0052 would require sending again, which again could potentially be rejected. We suggest that the NHHDC amends the EFD to the earliest effective date for which a Final Reconciliation Settlement Run has not taken place when processing the D0052 as it would minimise the number of rejections due to effective dates which is currently an industry issue. Another solution	✔	

		would be to apply timescales on the NHHDC for the processing of D0052s, i.e. D0052s must be processed by the NHHC within 1 working day of receipt from the UMSO. If timescales were in place the UMSO would be able to populate the D0052 with an EFD that could be accepted. **Capacity in which Organisation is impacted:** UMSO **Impact on Organisation (e.g. systems/process changes):** Processes		
EDF Energy	X	Although this change is targeted at unmetered supplies it would also have a significant impact on metered supplies. It would require significant amendments to core NHHDC processing for what seems to be resolving a UMSO issue. However, the possible impact on metered supplies and settlements we believe would significantly outweigh any benefit for unmetered market. We have tried to consider why this scenario would occur and can only see that this has happened due to incorrect data being processed by a UMSO. To potentially impact on metered supplies operations to take account of such data is clearly not warranted. In fact if this change went through as Supplier we would want all our NHHDCs to be non-compliant as the potential problems for metered supplies of this change are significant. This change needs to be reconsidered and if UMSEG still feel that it is appropriate amend this change so that it has no impact on metered supplies. **Capacity in which Organisation is impacted** NHHDC and Supplier **Impact on Organisation:** System and process changes would need to be made as it is possible that valid flows would need to be re-instated if anyone makes a change in	✔	365

		last 14 months of history. It need not just be current Supplier and NHHDC that make a change that would impact on other parties. **Would implementation in the proposed Release have an adverse impact?** Yes – as a NHHDC we would be non compliant. As a Supplier we would hope that all our NHHDCs remain non-compliant with this change so to minimise problems for us on metered supplies.		
ScottishPower	X	We strongly disagree with the proposed CP on the grounds of lack of evidence that there is a problem which needs fixed and on the costs of implementing such a change to our systems. SP UMSO has experienced zero differences for both SPOW and MANW and were we to identify a mistake in submitting a non-concurrent D0052 we would communicate this with the relevant agent to correct. At present our system allows us to backdate an Inventory EFD, but ONLY to the date of the last EFD on the system. It would take considerable effort and cost to develop brand new functionality that allows expanded backdating, then forward sending of that and thereafter potentially further flows in chronological order. We would therefore suggest that the issue is with the internal processes of those parties affected by such an issue and a CP is not the place to resolve such an issue and the first effort should be made in applying the process which is already in place and works if followed correctly.	✔	270

		In addition to the points above we believe that; 1. It removes the incentive to manage UMS EACs efficiently; 2. The Supplier may not be able to reconcile the consumption with the customer; 3. It will be inconsistent with the metered process; 4. DC's are effectively having to workaround those UMSO's that do not accurately manage their inventory. **Capacity in which Organisation is impacted :** Supplier, NHHDC, UMSO **Impact on Organisation:** We expect such a change to impact on both systems and processes within our UMSO and DC businesses.		
Siemens Metering Services	X	This CP is particularly vague. It is not clear whether this is only intended to apply to unmetered sites, or if the change is aimed at both metered and unmetered sites. The wording is also ambiguous when stating that: "On receipt of a backdated D0052, NHHDCs should overwrite all previous data (including EACs) for that Metering System" What does 'Overwrite' mean? Does this mean that NHHDCs are to replace the EAC data, and recalculate all subsequent data? Upon receipt of the backdated D0052, are NHHDCs to assume that all subsequent data is invalid, until reconfirmed by the Supplier? It is unclear how NHHDCs are supposed to know if the Supplier intends to replace all the subsequent data. Are all subsequent D0052s to be sent at the same time as the first	✔	

		backdated flow? Potentially, Siemens Metering Services would need to make large scale system changes to accommodate this proposal, however as the requirements are rather vague it is difficult to complete a full impact assessment. Until further clarification on the requirements for this CP is provided, we can not support it. **Capacity in which Organisation is impacted** NHHDC **Impact on Organisation** System and Process Changes would be required **Comments** This would be the required timescale for development, testing and implementation of the system changes we would need to make. **Would implementation in the proposed Release have an adverse impact?** (please state impact) The CP form itself has a requested implementation date of June 2009, yet the above proposed implementation date states February 2008. Assuming that this is actually aimed at the February 2009 Release, then this would not provide us with sufficient time to make these changes.		
E.ON	x	If the rules will change to allow E.ON to amend data beyond RF then why develop a CP that limits it to the current obligations under the code. If the yet to be agreed change comes in during the same release then it doesn't make sense; if those changes – probably mod(s) – take longer then you will have make the amendment to the BSCP twice. The CP is in conflict with the potential changes to post RF	✔	-

		processing of settlement data. SVG will shortly consider the review of the paper, Changes To Data after the Reconciliation Final Run; it is likely that industry parties will be allowed to beyond RF in order to correct data errors. If the origins of the error rest further back than RF parties should be allowed to fix these broken records particularly as they have no material impact on settlement. **Impact:** Supplier System impacts identified The current MAM system (B-Smart) has no facility to send automated backdated D0052s, or to auto-resend any D0052s that need reaffirming as a result of this. Nor is historic EAC/AA data stored to enable this (although historic values for other D0052 data-items are). If an automated solution is required to meet these requirements (in B-Smart and/or MAD) then this is likely to require significant development time. **Would implementation in the proposed Release have an adverse impact? (please state impact)** Yes		
AccuRead LTD	Neutral	-	X	-

Comments on Redlined Text

No.	Organisation	Section	Comment
1	**Western Power Distribution**	**BSCP504 section 4.12**	**Happy with the redlined changes that have bee made but on BSCP504 attachment the line under BSCP504 section 4.12; should this say "**In populating the D0052 flow, the Supplier or UMSO will:-
2	**British Energy Trading and Sales Limited;**	BSCP504 Section 4.12 (3) L	Typing error – currently reads: 'Furthermore, when a receiving D0052...' should read '... when receiving a D0052...'
3	**British Energy Trading and Sales Limited;**	BSCP504 Section 4.12 (5) L	Typing error – currently reads: 'When receiving a D0052 a with backdated...' should read ...receiving a D0052 with a backdated...'
4	**Siemens Metering Services**	BSCP504 Section 4.12 Bullet points 10 & 21 H	New redlined changes state: .... when a receiving D0052 with a backdated Effective From Settlement Date, all previously-supplied D0052 data effective after that date should be overwritten. The word 'overwritten' is unclear, and depends on interpretation. Does this mean that the data should be recalculated and replaced? If so, then it should be reworded accordingly. If not, then please could further explanation/ clarification be provided.

CP1257 - Calculation of EAC for Temporary Supplies

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
CE Electric		✔
EDF Energy	Supplier, NHH Agents and HH MOP	✔
Central Networks	Distribution	✔
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
Power Data Associates Ltd	Meter Administrator	✔
E.ON	Supplier, Shipper	✔
Electricity North West Ltd	LDSO	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	X
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electric	✔	-	✔	-
EDF Energy	✔	-	X	0
Central Networks	✔	-	X	30
Western Power Distribution	✔	-	X	-
ScottishPower	✔	ScottishPower supports the change on the understanding that we would not be mandated to change our current process which serves us well when dealing with this type of connection. We appreciate that other Market Participants have experienced problems in regards to temporary supplies, however we believe we have a robust method which deals with the issue and as such could not support any change which would prevent us from continuing with our current practices. **Capacity in which Organisation is impacted:** UMSO **Impact on Organisation:** If our comments above are observed then we do not envisage any impact. However, if a change were to be mandated we would encounter an impact on our processes.	X	60
TMA Data Management Ltd	✔	-	X	-
Organisation: British Energy Trading and Sales Limited;	✔	-	-	-
RWE NPower Limited	✔	System Impact only	✔	-

Power Data Associates Ltd	✔	-	x	-
E.ON	✔	Recent communication with UMSOs confirmed that this method was in use by both UMSO in calculating the EAC and Supplier in billing the customer but by adding it to the BSC it will eliminate possible future confusion (such as could be caused by the addition of a new Supplier or UMSO to the market).	x	-
Electricity North West Ltd	✔	-	x	-
Scottish and Southern Energy	X	We do not believe that the proposal will address the issue of over or underestimation of consumption. **Impact on Organisation**: Process change **Comments:** Some concerns with the proposal regarding the 'daily burning hour' part of the calculation. For festive lamps customer sometimes provides details of the first days burning hours, followed by the daily times the illuminations are on for the remainder of the period. An example would be: 26th November - 'Switch on' 19:00 - 23:00 27th November to 6th January On 15:30 Off 23:00 So the calculation for the initial day would only be 4 hours compared with 7.5 hours the rest of the time. If the customer had a total load of 2300w connected during the above burning times the calculations would be: 9kWh for the 26th November 19:00 - 23:00 707kWh for 27th November - 6th January 15:30 - 23:00	✔	270

		Total kWh 716 If all days were calculated using 7.5 hours the kWh for the same period would be 725, an error of 9kWh based on the details the customer has provided. Also if the above figure of 7.5 was used to calculate out an annual burning hour, the figure would come to 2743.5 (taking into account the additional 6 hours per year for the leap year). If it was then decided to calculate on a rounding basis the customer could well end up with more kWh added to their energy bill, than working out the kWh based on actual hours.		
Siemens Metering Services	Neutral	-	-	-
E.ON UK Energy Services Limited	Neutral	-	-	-

CP1258 - Changes to BSCP520 Following Expert Group Walkthrough

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
CE Electric		✔
EDF Energy	Supplier, NHH Agents and HH MOP	✔
Central Networks	Distribution	
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
NPower Limited	Supplier, Supplier Agents	✔
Power Data Associates Ltd	Meter Administrator	✔
Electricity North West Ltd	LDSO	✔
E.ON	Supplier, Shipper	See comments
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	X
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electric	✔	-	X	-
EDF Energy	✔	-	X	0
Central Networks	✔	**Would implementation in the proposed Release have an adverse impact? (please state impact)** None		30
Western Power Distribution	✔	**Capacity in which Organisation is impacted**: UMSO **Impact on Organisation**: Minor procedure change	✔	30
ScottishPower	✔	We broadly support these proposed changes to the BSCP520. However we would hope that our issue as described below is addressed within this CP as opposed to requiring to be made at a later date. **Capacity in which Organisation is impacted:** UMSO, Supplier, NHHDA, HHDA, NHHDC, HHDC **Impact on Organisation**: Internal processes	✔	90
TMA Data Management Ltd	✔	-	X	-
Scottish and Southern Energy	✔	-	X	0
Siemens Metering Services	✔	**Capacity in which Organisation is impacted** NHHDC **Impact on Organisation** Minor process impacts **Would implementation in the proposed Release have**	✔	30

		an adverse impact? No adverse impact, assuming implementation is February 2009 (above states date as February 08 Release)		
AccuRead LTD	✔	No impact	X	0
RWE NPower Limited	✔	-	✔	-
Power Data Associates Ltd	✔	-	-	-
Electricity North West Ltd	✔	-	-	-
E.ON	See comments	E.ON are satisfied with the vast majority of this change proposal there is one point that we feel would need clarification before any acceptance could be given: The redlined changes to point 3.3.1.1 of BSCP520 (page 3 of CP1258 Attachment A) seems incorrect. The change, as per the main CP document aims to "Split 3.3.1.1 (HH Trading) into two steps to reflect equivalent NHH process (3.3.2.1)", however the amended text on the redlined document seems to be a copied version of point 3.3.2.1 from the current version of BSCP520 rather than a correctly split version of the current 3.3.1.1, to the extent that the 'copied' redlined version has been uncorrected and suggests that a "P207 NHH Unmetered Supply Certificate" should be sent for half hourly UMS sites (instead of the correct "P0170 HH Unmetered Supply Certificate" as currently stated by BSCP520). Assuming that this is simply a mistake and that the proposal is to accept or reject a correctly altered version, our opinion would be to accept the proposal and timescales, however please clarify this before we make our final decision. **Would implementation in the proposed Release have an adverse impact? (please state impact)** Yes	X	-

British Energy Trading and Sales Limited;	X	As per Supplier Hub principle, Supplier is responsible for accuracy of data entering settlement, and therefore the supplier should continue to have the ability to send a D0052 due to the necessity to correct settlement data. For additional reasons for rejection, please see section below that relates to the redline text.	-	-
E.ON UK Energy Services Limited	Neutral	No impact on established systems and processes	x	-

Comments on Redlined Text (delete table if not used)

No.	Organisation	Section	Comment
1	ScottishPower	BSCP520 3.3..2.1 & 3.3.1.1 M	It would seem highly inappropriate to cause further confusion within the BSCP by making the change to 3.3.2.1 and not make the same change to 3.3.1.1. However there is further confusion within the document as within the HH section we are sending the P207 which is for NHH UMS. Though we appreciate that the UMSEG specifically examined the NHH UMS market there is a clear requirement for clarity and consistency and this should be addressed within this change
2	British Energy Trading and Sales Limited;	BSCP520 (redline text) Section 3.3.1.1 Severity H	This section Is not clear as it is trying to do two steps in one (1. Supplier establishing with UMSO that UMS certificate is appropriate; 2. UMSO sending P0170 HH UMS Certificate to Supplier). NELC strongly suggest that this point is split into two separate points in the process i.e. 3.3.1.1 Action: Establish with the UMSO, etc… From: Supplier, To: UMSO; 3.3.1.2 Action: Send HH UMS Certificate From: UMSO, To: Supplier. It should be noted that currently the redline text includes the incorrect P-Flow reference: should be P0170 HH Unmetered Supply Certificate, not P207 NHH Unmetered Supply Certificate.
3	British Energy Trading and Sales Limited;	BSCP520 (redline text Section 3.3.1.2 Severity H	In the current BSCP520 (version 14.0) 3.3.1.2 refers to “Provide Latitude and Longitude information…” which is not accounted for in the redline text. Omission either requires full explanation as part of the CP or requires re-integration into proposed changes list and re-submission to parties for consideration

No.	Organisation	Section	Comment
4	British Energy Trading and Sales Limited;	BSCP520 (redline text) Section 3.3.2.1 Severity H	As with HH Trading section 3.3.1, point 3.3.2.1 is trying to do two steps in one. NELC strongly recommend that the point is split into two separate points in the process i.e. 3.3.2.1 Action: Establish with the UMSO, etc… From: Supplier, To: UMSO; 3.3.2.2 Action: Send NHH UMS Certificate From: UMSO, To: Supplier
4	British Energy Trading and Sales Limited;	BSCP520 (redline text) Section 3.5.4 Severity H	Since 3.5.3 states "Is UMS to be traded HH? If so, proceed to 3.5.4. If UMS not HH, proceed to 3.5.8" and point 3.5.8 states When: "If NHH", it follows that point 3.5.4 should state When: "If HH" for consistency and clarity
5	British Energy Trading and Sales Limited;	BSCP520 (redline text) Section 3.5.11 Severity	NELC agree that the reference to the D0036 should be removed from this point as the dataflow does not relate to NHH but there is no reference to the D0036 under 3.5.4 to 3.5.7 (HH) either. This should be amended and the new redline text re-issued to parties for consideration
6	British Energy Trading and Sales Limited	BSCP520 (redline text) Section 3.7.1 to 3.7.2 Severity H	It is imperative that these steps in the process remain, since it removes the requirement on the supplier to request all changes of energisation by the official D0134 dataflow. Therefore, point 3.7.3 ("Confirm to Supplier and MA…") should remain as When: "If HH" and 3.7.9 ("Confirm to Supplier and NHHDC…") should remain as When: "If NHH"
7	British Energy Trading and Sales Limited	BSCP520 (redline text) Section 3.8 Severity H	There is no rationale included in the CP as to why "Following De-energisation" should be removed from this title. This must be provided and the CP re-issued to parties for consideration. NELC strongly suggest that "Following De-energisation" remains under 3.8.
8	RWE NPower Limited	BSCP520 3.1.6	Would prefer to keep current wording as we would only want to receive the UMS Certificate when we have confirmed we are the supplier

No.	Organisation	Section	Comment
9	RWE NPower Limited	BSCP520 3.3.2.	1 P0207 goes from UMSO to supplier, this change will mean the section isn't consistent with the equivalent section for HH. General Comment - Is it appropriate for the supplier to be ensuring the certificate is appropriate? Or does this just mean to confirm all required info is present. Doesn't explain what it means to check it's appropriate
10	RWE NPower Limited	BSCP520 3.5.10	Text could be misread as sending D0170 to old NHHDC
11	RWE NPower Limited	BSCP520 3.7.9 now 3.7. 7	Definitely support the change to allow D0139 to be sent as required, this will reduce the number of D0095 exceptions received
12	RWE NPower Limited	BSCP520 3.8	Note at bottom - unclear what a partial disconnection is

CP1259 - Distributor-Supplier Notification where a Site is capable of Exporting (microgeneration)

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Central Networks	Distribution	✔
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
Gemserv Ltd	MRA Service Company Ltd (MRASCo)	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
E.ON	Supplier, Shipper	✔
Electricity North West Ltd	LDSO	✔
CE Electric		X
EDF Energy	Supplier, NHH Agents and HH MOP	X
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Central Networks	✔	**Impact on Organisation (e.g. systems/process changes)** Central Networks will support an automated solution to this CP using the D0001 dataflow, this will require minor IS system changes. In addition business processes will need refinement to deliver a robust solution.	✔	90
Western Power Distribution	✔	**Capacity in which Organisation is impacted:** LDSO **Impact on Organisation:** Systems changes will be required and new working practices introduced. **Would implementation in the proposed Release have an adverse impact? :** Yes – As this change has taken a while to get to this stage Feb 2009 implementation is now unachievable. The system changes will require 6 months to plan, schedule and implement so June 2008 could be achieved.	✔	180
ScottishPower	✔	We support this as a necessary means to establishing such a line of communication to ensure that meters are fitted with a backstop. We are of the understanding that where the other party agrees, a P flow can be sent by an agreed means of communication instead of over the DTN. Where this is the case then we have no problem supporting the CP. However we would not support such a change if it was required to be sent exclusively over the DTN. **Capacity in which Organisation is impacted:** LDSO, Supplier **Impact on Organisation:** Possible systems changes along	✔	90

		with internal process changes **Comments:** It could possibly be prudent to have a communication channel from the Supplier to the LDSO to counter the potential issue of a Customer sending the G83 to the Supplier as opposed to the LDSO. Alternately there should possibly be some form of information available to Suppliers to advise on what to do with these in the event of receiving a G83 from a Customer. I.e. advise which states that Customers should be informed who the G83 should be sent to within their geographical area, be it an established LDSO or one of the smaller IDNOs.		
Gemserv Ltd	✔	Ensures that a process is in place for LDSOs to inform Import Supplier once aware that site is capable of Exporting (Microgeneration). **Capacity in which Organisation is impacted** MRA Service Company Ltd (MRASCo) **Impact on Organisation** The D0001 flow would need to be amended to include and additional field for J0024- Site Visit Check Code Data Item **Implementation :** Changes to DTC - Implementation timescales: • From point CP is submitted to MDB decision – approximately 1 month • 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 November). • If it is a system change then from the date of approval,	✔	See comments

		industry would need 6 months to update their systems accordingly. A procedural change would take approximately 3 months. **Would implementation in the proposed Release have an adverse impact? (please state impact)** No		
TMA Data Management Ltd	✔	-	X	-
British Energy Trading and Sales Limited;	✔	-	-	-
Scottish and Southern Energy	✔	Changes to systems and processes	✔	180-270
RWE NPower Limited	✔	Implementation Date should say 2009 CP1259 is reliant on an MRA change to the valid set of the site visit check code - We do not believe this can be progressed through the MRA change process in time for the Feb 09 release which this is aimed for. Additionally we would need at least 6 months lead time to update and test this valid set which is used in several flows used by HH agents. Therefore we disagreed with the Feb release date and would prefer Nov 09. In the related changes section its not clear if they are proposing to change the D1 or the J0024 field or both?	✔	Nov 09
E.ON	✔	We support this solution but would recommend that a Working Practice and/or guidance is issued to LDSOs, when populating the free format fields within the D0001 flow. Use of standard text within the D0001 flow from the LDSO to the Supplier would simplify identification of data. For example, there could be two required entries:	✔	

		• Confirmation of the presence of microgeneration; and • Type of microgeneration (e.g. solar, wind). Guidance could also be given to LDSOs regarding population of mandatory fields, where data is missing. For example, there may be cases where the meter register id (a "MOP-owned" data item) is not known, but which is contained with the D0001 flow from the LDSO to the Supplier. **Impact**: Supplier This change (combined with 1260) is likely to involve significant changes to a number of retail systems (IPP, B-Smart, MAD, ICE) – unlikely to be complete by Feb 09, particularly as the associated change to Master Registration Agreement (MRA) has not yet been made visible. System impacts identified - D0001 flows are not currently sent between LDSO and Supplier, so new processes would need to be put in place to route and handle these flows. The new value for data-item J0024 would need to be recognised and business requirements gathered & implemented to process it. Potentially database changes required to store new values. These changes would need to be consistent with those for 1260 – from a system change point of view they would probably need to be done together. **Implementation :** Need to put back to release after Feb **Would implementation in the proposed Release have an adverse impact? (please state impact) Yes**		
Electricity North West Ltd	✔	**Impact:** LDSO **Comments**: Could you clarify for populating the D0001 – What 'Site Visit Check Code' should Distributors use until the MRA change goes through? What text should be populated	✔	243

		in the 'Reason for Request' field and what date should be used for the 'Date Fault Suspected/Detected' field (should it be the date the Distributor was notified of the micro generation by the customer)?		
CE Electric	X	**Disagree:** We suggest a modification to this proposal to include a requirement upon the supplier to request the MPAN record via D0168 data flow upon identification that metering is in place and metering/customer is capable of generating electricity. **Capacity in which Organisation is impacted:** LDSO **Impact on Organisation:** Processes would need to be reviewed and amended to accommodate these new obligations. Systems changes may also be required to support the increased frequency of issuing D0001 dataflows. **Would implementation in the proposed Release have an adverse impact?** Yes, this states February 2009 which we feel is too soon for the changes that would be required by our organisation.	✔	**270** At least nine months for these changes
EDF Energy	X	**Disagree:** We feel that this change is impractical without a DTC change to include a new Site Visit Check Code. Without a specific code for this then flow will go through manual process and this will potentially lead to delays in progressing examination of current import metering. With a manual process it would be better for LDSO to send details to a relevant contact point via email rather than by D0001. **Capacity in which Organisation is impacted:** Supplier **Impact on Organisation :** Currently process for dealing with manual D0001s would need to be amended to pick out these flows. We think it would be easier to resolve this with a specific requested action code so that flows with this code could be immediately sent to relevant teams. In fact without this new code we feel that process would be better	✔	90

		via email notification to relevant Supplier contacts. **Implementation:** If site visit check code change was made then we do not think that this change would be possible until June 2009. **Would implementation in the proposed Release have an adverse impact?** Yes, we feel that it is possible that some of these D0001s from LDSOs would not get picked up and so importing metering would not get checked.		
Siemens Metering Services	neutral	-	-	-
AccuRead LTD	Neutral	No impact	-	-
E.ON UK Energy Services Limited	Neutral	-	X	-

CP1260 - Meter Investigation Process where a Site is capable of Exporting (microgeneration)

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement (✓/X)
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
Gemserv Ltd	MRA Service Company Ltd (MRASCo)	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
AccuRead LTD	NHHDC, NHHDA, NHHMO	✔
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	✔
E.ON	Supplier, Shipper	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	Yes, with amendment
Electricity North West Ltd	LDSO	✔
Imserv	-	✔
CE Electrics		X
EDF Energy	Supplier, NHH Agents and HH MOP	X
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	X
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	X
RWE NPower Limited	Supplier, Supplier Agents	X

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✔	**Capacity in which Organisation is impacted:** MOA **Impact on Organisation:** Minor update to working practice documentation Other comments: Don't forget that D0149/D0150s go to other participants and not just the Supplier.	✔	30
ScottishPower	✔	**Capacity in which Organisation is impacted:** Supplier, LDSO, MOP, NHHDC, NHHDA **Impact on Organisation:** The change will result in changes to our internal processes. **Would implementation in the proposed Release have an adverse impact? (please state impact)** No **Comments:** For further clarity, we would suggest that a footnote attached to step 6.3.6.1 be included to state that the purpose is to ensure that import is correctly metered and there is no onus to record export.	✔	90
Gemserv Ltd	✔	Ensures that Suppliers are aware when an Import Meter is at risk of capturing Export energy and to create a process for checking the Import metering. **Impact:** The D0001 flow would need to be amended to include and additional field for J0024- Site Visit Check Code Data Item **Implementation:** Changes to DTC - Implementation timescales:	✔	

		• From point CP is submitted to MDB decision – approximately 1 month • 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 November). • 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. **Would implementation in the proposed Release have an adverse impact? (please state impact)** No		
TMA Data Management Ltd	✔	-	X	-
British Energy Trading and Sales Limited;	✔	-	-	
AccuRead LTD	✔	**Capacity in which Organisation is impacted** NHHMO **Impact on Organisation**: This change would require us to amend our NHHMO software in order to receive and respond correctly to the D0001 coming from the supplier using this process.	✔	180
E.ON UK Energy Services Limited	✔	This change will minimise the risk of inappropriate metering being used at an export capable site **Impact:** There may be an increase in the number of site visit requests generated.	✔	-

E.ON	✔	We support this solution but would recommend that a Working Practice and/or guidance is issued to LDSOs, when populating the free format fields within the D0001 flow. Use of standard text within the D0001 flow from the LDSO to the Supplier would simplify identification of data. For example, there could be two required entries: • Confirmation of the presence of microgeneration; and • type of microgeneration (e.g. solar, wind). Guidance could also be given to LDSOs regarding population of mandatory fields, where data is missing. For example, there may be cases where the meter register id (a "MOP-owned" data item) is not known, but which is contained with the D0001 flow from the LDSO to the Supplier. **Impact:** Supplier This change (combined with 1259) is likely to involve significant changes to a number of retail systems (IPP, B-Smart, MAD, ICE) – unlikely to be complete by Feb 09, particularly as the associated change to Master Registration Agreement (MRA) has not yet been made visible. System impacts identified - D0001 flows are not currently sent between LDSO and Supplier, so new processes would need to be put in place to route and handle these flows. The new value for data-item J0024 would need to be recognised and business requirements gathered & implemented to process it. Potentially database changes required to store new values. These changes would need to be consistent with those for 1260 – from a system change point of view they would probably need to be done together.	✔	

		Implementation Need to put back to release after Feb **Would implementation in the proposed Release have an adverse impact? (please state impact) -** Yes		
Association of Meter Operators	Yes, with amendment	The proposed change to BSCP514 should changed so that the proposed step 6.3.6.3 is replaced with, "if meter needs replacement follow process defined in section 6.3.4" The section in 6.3.4 includes all the steps necessary to trigger, perform and notify all relevant parties of the meter change. The proposed 6.3.6.3 does not, and is inconsistent with 6.3.4 which will lead to confusion. **Impact:** MOA will need to modify enquiry processes.	✔	-
Electricity North West Ltd	✔	-	✔	243
Imserv	✔	We are in agreement with the principle of the suggestion however there are some caveats to this. The use of the D0001 process is acceptable however would result in these requests impacting PARMS serials and also internal monitoring, if they are not clearly identifiable for exclusion. Our acceptance is therefore conditional upon the fact that the D0001 be amended to include a Data Item to enable the clear identification of such instances. As an alternative, the D0005 could be used instead of a D0001 as this already includes Data Item, J0007 (Requested Action Code) which could be more easily extended to cater for such scenarios. It should also be noted that the installation of a suitable meter may have a dependency on the type of contractual arrangements that the MOP has with their Customers/Suppliers and therefore it cannot be assumed or guaranteed that the timescales proposed in the CP are achievable. Indeed these arrangements might totally	✔	180

		prevent the installation of such. **Impact:** MOA Process and systems changes would be required, depending on the solution adopted. **Implementation :** A six month lead time would be required from the point of confirmation of the change should the Wheatley MOP application be impacted by the chosen solution. Comments: It is expected that a site visit and on site testing would be required in order to ascertain, with certainty, the ability of mechanical meters in particular, to comply with the micro-generation requirements.		
CE Electric	X	**Disagree:** We reject this change in line with CP1259 and suggest a modification to the proposal to include a requirement upon the supplier to request the MPAN record via D0168 data flow upon identification that the import/export metering is in place and the customer is capable of generating electricity.	At present no	-
EDF Energy	X	**Disagree:** Please see details of response to CP 1259. Supplier has same problem with D0002 from MOP as with D0001 from LDSO. **Capacity in which Organisation is impacted** Supplier and MOP **Impact on Organisation:** Current process for dealing with manual D0002s would need to be amended to identify these flows. We think it would be easier to resolve this with a specific requested action code so that flows with this code could be routed to relevant team based on this new code.	✔	90

		Implementation: If site visit check code change was made then we do not think that this change would be possible until June 2009. **Would implementation in the proposed Release have an adverse impact?** Provided MOP does not send a D0002 requesting further action and changes meter if cannot install backstop then should not be an issues. If not then there is a chance that these D0002s could get missed and settlements impacted.		
Scottish and Southern Energy	X	We are not convinced that the D0001 is the correct flow to use. A D0001 flow is to investigate faults/discrepancies on communication failures A D0142 flow is a request for suitable metering. Following the site visit, a D0002 if meter installed is suitable or a D0149/D0150 if new meter fitted. Not both flows. **Impact** Changes to system and processes	✔	365
Siemens Metering Services	X	As in our previous response to DCP0030, Siemens Metering Services still believe that the D5 flow would be more appropriate than the D1, for the Supplier to request the site visit from the MOA. The D1 flow relates to Meter fault investigations, and therefore it is misleading to use this type of flow in this instance. D1s and D5s are handled differently. If CP1260 is implemented, this will create a need for manual intervention in order to sort through the D1 fault investigation flows to identify those which require visits to identify if backstops are required, or if the meter requires replacing.	✔	90

		Capacity in which Organisation is impacted MO **Impact on Organisation:** Process changes would be required. **Would implementation in the proposed Release have an adverse impact?** No adverse impact, assuming implementation is February 2009 (above states date as February 08 Release)		
RWE NPower Limited	X	Implementation Date should say 2009 The proposed wording of the obligation would mean that Suppliers are obligated to instruct the MOA to undertake an investigation in every instance, which does not take into account Supplier, or MOA Knowledge. The wording should be changed to account for the Supplier MOA Knowledge. We may wish at this point in time to ask our MOP to investigate but in the future that may change as new Metering is installed. Additionally we anticipate that SMART/AMR meters will be able to be remotely reconfigured so references to changing meters/site visits may not be necessary in every case. It also assumes that there will be a single import meter and should an export capability be required then a separate meter will be installed. There are exceptions to these assumptions which will increase in number over time. These are a) the Supplier has or will request the installation of an integrated meter i.e. capable of measuring both import and export energy, or b) the Supplier's metering asset data is sufficiently detailed	✔	-

		that they can determine whether to request a meter exchange via the D0142. **Impact:** We believe there will be impact on processes		

Comments on Redlined Text

No.	Organisation	Section	Comment
1	**Western Power Distribution**	BSCP514 - 6.3.6.3	Severity - D0149 & D0150s also need to go to the data collector and LDSO
2	**Association of Meter Operators**	BSCP514 6.3.4 H	The proposed change to BSCP514 should changed so that the proposed step 6.3.6.3 is replaced with, "if meter needs replacement follow process defined in section 6.3.4" 6.3.4 Reconfigure or Replace Metering System (No Change of Measurement Class)
3	**Electricity North West Ltd**	BSCP514 6.3.6.3 Low	if the meter is changed the MOA should update Distributor and Data Collector with the new meter details (D0149/D0150)as well as the Supplier

CP1261 - Introducing Metering Code of Practice 10 to facilitate smart metering in the Half Hourly (HH) market

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
CE Electric		✔
EDF Energy	Supplier, NHH Agents and HH MOP	✔
Western Power Distribution	LDSO, MOA,	✔
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator, Trader	✔
TMA Data Management Ltd	HHDC, HHDA, NHHDA	✔
British Energy Trading and Sales Limited	Supplier/Trader/CVA MOA/Generator	✔
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	✔
Stark Software Ltd	HHDC HHDA and HHDR	✔
RWE NPower Limited	Supplier, Supplier Agents	✔
Association of Meter Operators	Trade Association having membership of all active Meter Operators	✔ with amendment
E.ON UK Energy Services Limited	NHHMO HHMO NHHDC NHHDA	X
E.ON	Supplier, Shipper	X
Energy Services and Technology Association (ESTA)	Trade Association for Suppliers of metering equipment and services, including a number of Suppliers and accredited agents (HHDC, NHHDC, HHMOP, NHHMOP)	X
AccuRead LTD	NHHDC, NHHDA, NHHMO	Neutral

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electrics	✔	**Agree:** Agree on the basis that this change will support and encourage accurate settlement data. **Impact on Organisation's Systems and/or Processes?** Yes **Capacity in which Organisation is impacted:** LDSO **Impact on Organisation:** This change would result in our site specific half hourly DUoS billing system receiving an increase in half hourly data resulting in a potential decrease in system performance.	✔	**Unknown:** We would need to asses the capability of our site specific DUoS billing system.
EDF Energy	✔	**Capacity in which Organisation is impacted** : Supplier and MOP **Impact on Organisation:** MOP – to ensure smart meter is compliant with relevant CoP for it to be traded electively as HH. Supplier – to ensure change of measurement class processes take into account ability to trade as HH elective where smart meters are installed.	✔	60
Western Power Distribution	✔	**Capacity in which Organisation is impacted** LDSO & MOA **Impact on Organisation**: Procedural changes	✔	30
ScottishPower	✔	**Agree:** ScottishPower fully support the introduction of the new COP10 and believe that it will better facilitate the use of such meters within both the NHH and HH market. **Impact on Organisation's Systems and/or Processes?** (Please delete as appropriate) Yes **Capacity in which Organisation is impacted (e.g. Supplier,**	✔	120

		HHDC, etc) Supplier, MOA, DC **Impact on Organisation:** We would expect there to be impact on our internal processes and also a potential impact on our systems. However, a fuller assessment of the changes would be required to quantify these if the CP is approved. **Would implementation in the proposed Release have an adverse impact?:** As the CP is mainly to facilitate the use of such meters within both the NHH and HH markets we would not expect to be adversely affected by the proposed release date as it would be unlikely that such meters would be actively used at implementation to any great extent.		
TMA Data Management Ltd	✔	**Capacity in which Organisation is impacted** :HHDC **Impact on Organisation:** Systems and processes	✔	60
British Energy Trading and Sales Limited	✔	**Other Comments:** The final paragraph of Page 1 states CoP10 will only apply to LV whole current HH/NHH meters. Given CoPs 8 & 9 cover LV whole & secondary current NHH meters, two questions arise : (1) For a new LV NHH whole current Metering System, will CoP8, 9 or 10 apply? (2) Which CoP will apply to a new LV HH secondary current Metering System?	-	-
Scottish and Southern Energy	✔	**Impact:** No	X	0
Stark Software Ltd	✔	**Impact:** HHDC Optional and slight system and procedural changes **Other Comments:** SSI supports this proposal.		N/A as optional

RWE NPower Limited	✔	**Comments:** Implementation Date should say 2009 **Impact:** System Amendments may be required to HH Agent Systems	✔	-
Association of Meter Operators	Yes, with amendment	**Comments:** A great enabler for developing cheaper metering systems to satisfy the BERR requirements particularly in the PC5-8 sector, and also the PC3-4 sector.	-	-
E.ON UK Energy Services Limited	X	**Comments:** Whilst we support the concept of behind CoP 10 we believe the current draft requires additional work to ensure its viability within the sector it is being aimed at. **Impact:** MOA NHHDC If this process is adopted by suppliers substantial changes will be required to our MOA systems & processes. In addition it should be bourn in mind that the present COMC process is not robust & should be reviewed prior to an increase in this activity.	✔	
E.ON	X	**Comments:** E.ON agree that the HH Elect should be eased of the burden placed upon the higher specification HH metering and that if there is no requirement to undertake a MAR on a HH meter then it follows that this should also be the case for HH Elect. It just seems a little counter-intuitive to suggest the solution should advocate no requirement is placed on HHDCs to carry out a site visit but retain the requirement on Suppliers to arrange them. E.ON may accept the change if providing this point was addressed. **Would implementation in the proposed Release have an adverse impact? (please state impact)** Yes	X	
Energy Services and Technology	X	**Comments:** There are some fundamental issues with the Cop10	-	

Association (ESTA)		document and its scope, which make it difficult to agree **Impact on Organisation's Systems and/or Processes?:** Yes/ No **Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc):** ESTA membership includes the following relevant party members British Gas Business (Supplier) Eon (Supplier, NHHDC, HHDC, NHHMOP, HHMOP) NPower (Supplier, NHHDC, HHDC, NHHMOP, HHMOP) Siemens (HHDC, HHMOP, NHHDC, NHHMOP) Stark (HHDC, NHHDC) Utility Partnerships Limited (HHMOP, NHHMOP, NHHDC) Western Power (HHMOP, NHHMOP) **Impact on Organisation (e.g. systems/process changes):** Market viability of members products, systems and services, and restriction of metering options to end user customers **Would implementation in the proposed Release have an adverse impact? (please state impact):** Yes **Other comments:** Cop 10 Issue 1 Version 0.2 Page 1 The IPR cover paragraph prevents a customer or service provider from using this document except for settlements purpose. This excludes the two main drivers for smart metering - serving meter readings to an energy supplier, and using half-hourly data for energy management purposes. Page 6 Scope There are still a number of unclear areas, and the Code prevails – does this mean users are called upon to refer to the Code and BSC		

		Procedures for clarification? The Cop document can only be useful if it is self-contained General Is this document for single-phase or 3-phase meters, or both? This is not specified – is that intentional? Elective HH – please clarify whether it is the customer or supplier that elects to go half-hourly, and what are the associated benefits		
AccuRead LTD	Neutral	Comments: No impact	x	0

Comments on Redlined Text

No.	Organisation	Section	Comment
1	**ScottishPower**	COP 10 Section 3.9 Severity L	Two instances of “means,”
2	**ScottishPower**	COP 10 Section 3.9, 3.10 Severity L	The indicator should be changed to reflect that the definition has been obtained from the code * as opposed to †
3	**British Energy Trading and Sales Limited**	BSCP502	For clarity, the exclusion of CoP10 from proving tests should be stated against 4.6, not 4.6.1
4	**British Energy Trading and Sales Limited**	BSCP601 3.4.11(e) M	Although reactive energy meter accuracy requirements are stated here as not applicable to CoP10, Clause 4.1.1 of CoP10 (Attachment A) allows the option of reactive energy measurement. Please clarify this apparent inconsistency.
5	**British Energy Trading and**	BSCP601 3.4.27.1	Why are EMC tests (a) and (b) not applicable to CoP10 meters?

No.	Organisation	Section	Comment
	Sales Limited	M	
6	**British Energy Trading and Sales Limited**	BSCP601 3.4.27.2 M	Why are Immunity to Electromagnetic HF Field tests (a) and (b) not applicable to CoP10 meters?
7	**British Energy Trading and Sales Limited**	BSCP502 Changes 3.3.1 L	The recorded change is not included in BSCP502 (Attachment B) as stated
8	**British Energy Trading and Sales Limited**	BSCP502 Changes 3.5 L	For clarity, the exclusion of CoP10 from proving tests should be stated against 3.5.1 and 3.5.2 as well as Appendix 4.6
9	**British Energy Trading and Sales Limited**	BSCP502 Changes 4.5 L	For clarity, the final para of 4.5 should include a qualification to cover the exclusion of CoP10 from proving tests
10	**British Energy Trading and Sales Limited**	BSCP514 Changes 8.3 L	For clarity, the exclusion of CoP10 from proving tests should be stated against 8.3, not 8.3.1
11	**AMO**	Cop10 5.3 L	There is a entry of kWh using the incorrect capitalisation.
12	**AMO**	CoP10 3.7 L	There is a entry of kVAr & kVARh using the incorrect capitalisation.

No.	Organisation	Section	Comment
13	**AMO**	Cop10 5.6 note M	Note should be removed. MOCOPA is a definition so this note is redundant.
14	**AMO**	CoP10 All L	There are a number of extra blank spaces and blank lines which could be removed. There are also odd lines of test requiring a whole page. In line with the BSC requirement to reduce Carbon Impact, can the document layout be reviewed to minimise the page count?
15	**AMO**	BSCP601 3.4.8 H	Suggest the text is clarified by the following changes: "Meters subject to CoP10 compliance testing shall be deemed to meet all of the Settlement accuracy requirements for Active Energy if the Meter is approved under SI 1998 No 1566 or SI 2006 No 1679."