# <u>CPC00669 – Impact Assessment Responses for CP1315 and CP1316</u>

### CP1315 - Maintenance of Outstation Types as part of Compliance and protocol approval

## Summary of Responses

| Organisation   | Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate) | Agreement<br>Yes/No | Days Required<br>to Implement |
|--|---|---------------------|-------------------------------|
| Gemserv  | MRASCo Ltd  | Neutral             |                               |
| Independent Power Networks Limited   | LDSO, UMSO, SMRA  | Neutral             |                               |
| IMServ   | HHDC/MOP  | Yes                 | 30                            |
| Stark Software<br>International Ltd  | HHDC/HHDA/NHHDC/NHHDA/NHHDR   | Yes                 | 0                             |
| NPower Limited   | Supplier, Supplier Agents   | Yes                 |                               |
| SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA                               | Yes                 | 0                             |
| British Energy Direct<br>Limited   | Supplier  | No                  | 120                           |
| Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro- Electric Power Distribution                        | Supplier/Generator/ Trader / Party Agent / Distributor                                | Yes                 |                               |

| Ltd; Medway Power Ltd;<br>SSE Metering Ltd; |      |     |  |
|---|------|-----|--|
| TMA Data Management                         | HHDC | Yes |  |
| E.ON UK Energy Services<br>Limited          | MOA  | No  |  |

## <u>Detailed Impact Assessment Responses</u>

| Organisation                          | Agreement<br>Yes/No | Comments  | Impact<br>Yes/No |
|---------------------------------------|---------------------|---|------------------|
| Independent Power<br>Networks Limited | Neutral             | Agree Change Comment: IPNL would like to comment that a co-ordinated approach with the MRA will need to be taken (if approved) to ensure that the MRA is updated to sign post the changes in BSCP601.   | No               |
| IMServ                                | Yes                 | Agree change comment: We agree with the change proposed.  This will prevent the existing delays in notifying parties of new Outstation Types, which results in numerous workarounds and manual processes being employed to ensure the correct outstation types are defined.  Capacity in which Organisation is impacted: HHDC/MOP  Impact on Organisation (e.g. systems/process changes): Process changes  Adverse Impact? No | Yes              |
| Stark Software<br>International Ltd   | Yes                 | Capacity in which Organisation is impacted: HHDC Impact on Organisation (e.g. systems/process changes): Occasional system updates as new meter types arise.  Adverse impact? No Cost details: £0 Any other comments: Please consider the use of the following codes or publish likely alternatives ASAP: ISKRA MT375 = IMT ISKRA MT423 = FMT EDMI Mk10 = EDM  | Yes              |
| NPower Limited                        | Yes                 | Impact on Organisation Minimal impact   |                  |

| Organisation                     | Agreement<br>Yes/No | Comments   | Impact<br>Yes/No |
|----------------------------------|---------------------|--|------------------|
| SAIC on behalf of:               | Yes                 | No additional comments.  | No               |
| British Energy Direct<br>Limited | No                  | British Energy have not agreed with CP1315 for the reasons highlighted below;  | Yes              |
|                                  |                     | Systems The suggested inclusion of non-DTC-validated Outstation IDs within the D0268 will result in a mandatory system change, to accommodate the various references that would be included as new metering types pass the protocol approval process. Since there will be multiple new references, all internal systems receiving D0268s will need to have all validation settings removed for this field, if MTDs are to continue to process successfully. This means that there will be no way for Supplier to proactively highlight "invalid" outstation types that are not recorded in the Protocol Approvals list.  |                  |
|                                  |                     | Data Quality As CP1315 proposes the removal of a DTC-recognised valid set as a part of the process, there would no longer be any regulation on what is included in the Outstation ID field. This could potentially cause an increased number of manual errors included in this field. If the associated Data Collector cannot determine the protocol due to incorrect entry of Outstation ID, this will result in an increased number of dial failures and D0001s raised, ultimately resulting in an increased level of estimated data being submitted into Settlement. If seen in significant numbers, this could ultimately affect Supplier performance and be detrimental to the agents' ability to adhere to the appropriate PARMs serials. We also have concerns about Proving Tests as the Meter Technical Details received may not contain the Outstation id that has been installed which puts the onus on manual investigation to determine what was installed. |                  |
|                                  |                     | TAA This CP will have an effect on the ability of the TAA to assess compliance of  |                  |

| Organisation | Agreement<br>Yes/No | Comments   | Impact<br>Yes/No |
|--------------|---------------------|--|------------------|
|              | Yes/No              | these metering systems if outstation types are not held within the DTC. There will be no check that the TAA could perform against the validity of an outstation type against the D0268 received and therefore, ultimately, this could have the potential impact on settlement of a Cat 1 non-compliance that the TAA would be unable to identify.  Counter-Proposal  We suggest the following process for consideration; Current DTC-validated Outstation ID set would remain, with the addition of a "dummy" or similar ID reference for any meter that has passed the protocol approval process but does not yet have an Outstation ID reference that is recognised by the DTC. This dummy ID would be included on the initial D0268, from which the associated Data Collector would know to refer to the Protocol Approvals list and assign an Outstation ID accordingly.  At the next possible DTC System Release, the approved Outstation ID would be added to the valid set list within the DTC. When this has taken place, there would be a mandatory requirement on Meter Operators to re-send D0268 information with this now-validated Outstation ID included. | Yes/No           |
|              |                     | This would ensure that the integrity of D0268 information within the market is not compromised. Having up-to-date information satisfies the original Justification for Change, as per CP1315.  |                  |
|              |                     | Impact on Organisation's Systems and/or Processes? Yes   |                  |
|              |                     | Capacity in which Organisation is impacted)  Supplier  |                  |
|              |                     | Impact on Organisation: Systems and process changes  |                  |
|              |                     | Implementation 120 WD  |                  |
|              |                     | Comments Implementation of Systems and process changes   |                  |

| Organisation  | Agreement<br>Yes/No | Comments  | Impact<br>Yes/No |
|---|---------------------|---|------------------|
|   |                     | Would implementation in the proposed Release have an adverse impact? Yes  |                  |
| Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd;   | Yes                 | Amendments to process and procedures.   | No               |
| TMA Data Management   | Yes                 | Comments CTMA support the change as we believe it offers the most flexible solution  Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted HHDC Impact on Organisation Systems / Procedures Would implementation in the proposed Release have an adverse impact? (please state impact) No   |                  |
| E.ON UK Energy Services Limited  Comments: We have significant Issues with the retain the concept of a valid set of outstation ty then validation is required within the participant values are loaded into their systems. Whilst the MDD system then there is an established mechanges. Under the proposed regime an paralle |                     | Comments: We have significant Issues with this approach. If it is the intention to retain the concept of a valid set of outstation types (as would appear to be the case) then validation is required within the participants systems to ensure that only valid values are loaded into their systems. Whilst these valid values are held within the MDD system then there is an established mechanism for identifying and implementing changes. Under the proposed regime an parallel system will need to be establish to publicise and implement changes both internally and externally. | Yes              |
|   |                     | In addition changes will be required to the data item definition within the DTC.  Impact on Organisation's Systems and/or Processes?  Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)  MOA  Impact on Organisation (e.g. systems/process changes) See Above   |                  |

| Organisation | Agreement<br>Yes/No | Comments | Impact<br>Yes/No |
|--------------|---------------------|----------|------------------|
|              |                     |          |                  |

#### CP1316 - Removal from BSCP536 of obligation to attach a copy of Form 536/01 to BSCCo Bill

## Summary of Responses

| Organisation   | Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate) | Agreement<br>Yes/No | Days Required<br>to Implement |
|--|---|---------------------|-------------------------------|
| Gemserv  | MRASCo Ltd  | Neutral             |                               |
| Independent Power Networks Limited   | LDSO, UMSO, SMRA  | Neutral             |                               |
| NPower Limited   | Supplier, Supplier Agents   | Yes                 |                               |
| SAIC on behalf of:   | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA                               | Yes                 | 0                             |
| ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd                                      |   |                     |                               |
| British Energy Direct<br>Limited   | Supplier  | Neutral             | -                             |
| Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro- Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd; | Supplier/Generator/ Trader / Party Agent / Distributor                                | Yes                 |                               |
| TMA Data Management  | HHDC  | Neutral             |                               |

<u>Detailed Impact Assessment Responses</u>

| Organisation  | Agreement<br>Yes/No | Comments                             | Impact<br>Yes/No |
|---|---------------------|--------------------------------------|------------------|
| Gemserv   | Neutral             | No additional comments.              | No               |
| Independent Power<br>Networks Limited   | Neutral             | No additional comments.              | No               |
| NPower Limited  | Yes                 | No additional Comments               | -                |
| SAIC on behalf of   | Yes                 | No additional comments.              | No               |
| Southern Electric Power<br>Distribution; Keadby<br>Generation Ltd; SSE Energy<br>Supply Ltd; SSE Generation<br>Ltd; and Scottish Hydro-Electric<br>Power Distribution Ltd; Medway<br>Power Ltd; SSE Metering Ltd; | Yes                 | Amendments to process and procedures | No               |