

**CPC00651 – Impact Assessment Responses for DCP0040, CP1248 v2.0, CP1268, CP1269, CP1270, CP1271, CP1272, CP1273, CP1274, CP1275, CP1276, CP1277 and CP1278**

**DCP0040 - Submitting Meter Technical Details to the Technical Assurance Agent**

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	Yes	90
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	270
<b>IMServ Europe Ltd</b>	HHDC, MOA	Yes	90-365
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	90
<b>British Energy Direct Limited</b>	Supplier	Yes	-
<b>NPower Limited</b>	Supplier, Supplier Agents	Yes	-
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	182
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Yes	-
<b>Western Power Distribution</b>	LDSO / MOA	No	180
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	No	9-12 Months
<b>SSIL</b>	HHDC	No	180
<b>Association of Meter Operators</b>	Trade Association for Meter Operators	No	-
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	Various (See comments)
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
EDF Energy	Yes	<p><b>Option: 1</b>  <b>Comments:</b> We feel that both solutions would be an improvement on current process but strongly prefer option 1 to send flows by DTN. The only issue being that the current format of the D0268 does not allow CT and VT information to be provided and this could be required by TAA.                      Option 2 requires new functionality to be built to produce a D0268 in a format that can be attached to a email and sent to TAA. Costs for this are significantly higher than option 1.  <b>Impact on Organisation (e.g. systems/process changes)</b> HH MOP - System and process  <b>Implementation</b> Systems changes are minor for a new instance of this existing flow and process will be to manually send flows to TAA as required.</p>	Yes
ScottishPower	Yes	<p><b>Option: 2</b>  <b>Comments:</b> While we welcome the move to an electronic submission of MTDs to the TAA, we do not believe that using the DTN to send the D0268 is the best solution. In order for Scottish Power to do this would require an internal system change to extract the required information, and as this would only be required on an ad-hoc basis at the request of the TAA, we can see no cost benefit. Our preferred option is therefore option 2, sending the MTDs in a D0268 flow via e-mail.  <b>Impact on Organisation's Systems and/or Processes?</b> Supplier, HHDC, MOA  <b>Impact on Organisation (e.g. systems/process changes)</b> Internal System Changes  <b>Implementation</b>  <b>Comments</b></p>	Yes
IMServ Europe Ltd	Yes	<p><b>Option: 2</b>  <b>Comments:</b> If by providing data in a different format is beneficial then IMServ's existing MOA and DC reports can with sufficient lead time be changed to provide data in this format – Presumably pipe delimited D0268.                      Option 2 is the preferred option as it requires the minimum of change. Option 1 appears to suggest that every D0268 submitted by the MOA should be mirrored with a DTN Flow to the TAA. However, irrespective of the volume of MTDs to be transferred,</p>	Yes

		<p>changes would be required to be made to the Wheatley MOP application for the MOA function and also to the HHDC systems. This is likely to be time consuming and expensive for little benefit.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes - HHDC, MOA  <b>Impact on Organisation (e.g. systems/process changes)</b> - Systems development required</p> <p><b>Comments</b> Option 2 90d from point of final approval for internal report change.  Option 1 180-365d for Wheatley MOP or HHDC system changes .  The proposal seems to infer that the MOA would be required to send a copy of all D0268 flows to the TAA in addition to existing requirements. This would appear to expose the TAA to an increased volume of data that is not currently deemed necessary.</p>	
<b>TMA Data Management Ltd</b>	Yes	<p><b>Option: 1</b>  <b>Comments:</b> We strongly support the submission of D0268 data via DTC by adding the TAA to the recipient list of D0268 flows to ensure that the TAA receives all D0268 issued by MOA. This would allow the TAA process to be more efficient and more importantly to be able to fully carry out its functions. The D0268 quality is a critical area of HH data quality; any process aiming at improving the D0268 quality issued by MOA is extremely welcome. The quality of D0268s appears, quite prominently, on Elexon's top 10 risks, with less than robust controls available. PARMs data evidences a high rate of error with D0268s, evidencing that there is a problem that does need to be addressed. To go down any other path than this or to use any alternative to the DTN seems perverse if it weakens potential for auditability. This change directly supports a BSC Objective, Section L, 2.4.1 (b) [ "The Registrant of each Metering System shall, in accordance with the relevant BSC" Procedures:"] ..."ensure that such Meter Technical Details are true, complete and accurate."</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes  <b>Capacity in which Organisation is impacted:</b> HHDC  <b>Impact on Organisation:</b> Both systems/process changes</p>	Yes
<b>British Energy Direct Limited</b>	Yes	<p><b>Option:1</b>  <b>Comments:</b> We agree that the TAA should receive the D0268 via the DTN from the MOP. We are of the view that the TAA should be confirming that the D0268 that they received from the MOP is the same as the D0268 that supplier or DC received. Therefore we do not believe suppliers or DC's would be required to submit a D0268</p>	Yes

		via DTN. <b>Impact on Organisation's Systems and/or Processes? Yes</b> <b>Impact on Capacity? Supplier</b>	
<b>NPower Limited</b>	Yes	<p><b>Comments</b> Option 1 has associated system and development costs which a we do not recognise as having any perceived benefit. We do not support this option.</p> <p>Option 2 is preferable, assuming that the CP is only relating to TAAMS main sampling (and therefore limited in volume).</p> <p>A suggested option 3 would be to upload a text file created from agent systems from the latest MTD flows and load this onto the TAAMT. This can then be accessed by the TAA. Format of the text file would have to be specified.</p> <p><b>Preferred Option (delete as appropriate) 2</b></p> <p><b>Impact on Organisation's Systems and/or Processes? Yes</b></p> <p><b>Impact on Organisation (e.g. systems/process changes) Process and System Impact</b></p>	Yes
<b>E.ON</b>	Yes	<p><b>Prefered Option :1</b></p> <p><b>Comments</b> Use of industry data-flows than other forms of communication.</p> <p><b>Impact on Organisation's Systems and/or Processes? Yes</b></p> <p><b>Capacity in which Organisation is impacted: Supplier</b></p> <p><b>Impact on Organisation (e.g. systems/process changes) System</b></p> <p><b>No. of Calendar Days Min. 182 days Comments</b> There are potential system changes; we would need further analysis if draft is approved.</p>	Yes
<b>E.ON UK Energy Services Limited</b>	Yes	<p><b>Prefered Option : 1</b></p> <p><b>Comments</b> This would be the more robust solution</p> <p><b>Impact on Organisation's Systems and/or Processes: Yes</b></p> <p><b>Capacity in which Organisation is impacted MOA</b></p> <p><b>Impact on Organisation : System updates would be required</b></p>	Yes

<b>Western Power Distribution</b>	No	<p><b>Option: 1</b>  <b>Comments:</b> As TAA currently only inspects a small sample of data we don't think they need to hold METD for all meters. If they are sent all the D0268 data then it increases the potential for "mission creep" as new checks could be dreamed up simply because the TAA holds the data</p> <p>If the D0268 is to be sent then we would prefer it to go over the DTN.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> System changes and process changes will be required to implement this.  <b>Comments:</b> If there are problems with the current process and it is believed that sending data by a D0268 will solve the problem, we would prefer the TAA to send a D0170 to the MOA so that the D0268 could be sent back automatically.</p>	yes
<b>Scottish and Southern Energy</b>	No	<p><b>Option:</b> Neither  <b>Comments:</b> Both options seem to suggest a requirement of MTDs to be sent via D0268 from MOP, HHDC and Suppliers. D0268 is a flow from MOP only. It is not clear how the HHDC and Suppliers will produce a D0268 other than populating manually from their operational source data. Thereby, defeating the object of this change.  Further considerations and clarifications are required before decision can be made.  <b>Impact on Organisation's Systems and/or Processes?</b> Changes to systems and processes  <b>Impact on Organisation (e.g. systems/process changes)</b>  <b>Implementation</b> Unable to comment until the solution is further defined.  <b>Comments</b> This proposal also appears to be extending the scope of this change, for example, 'The TAA to receive every D0268 issued by the MOA.' Why would TAA require every D0268 from MOP? This would increase the changes to the MOP system. On the face of it, this does not appear to be a cost effective solution.  If this proposal is progressed the option to 'bring the details to the inspection' should continue.</p>	Yes
<b>SSIL</b>	No	<p><b>Comments</b> At present, the D0268s received from the MOP can be submitted to TAA via the existing TAA web facility. The proposals above (sensibly perhaps) require the actual MTDs that are being used to be sent. HHDCs however do not generate or send D0268s for any other reason, and the task of generating one directly from data retrieval systems for this purpose only is not insignificant. We do not think that this is</p>	Yes

		<p>a good use of resources as the HH data comparison provides the comfort that all is well. Where HH data does not match, then further MTD investigation might be justified, but until then the MTD from the MOP and data from HHDC should in most cases confirm that all is well.</p> <p><b>Preferred Option (delete as appropriate)</b> 1 or 2</p> <p><b>Comments</b> Both have the feature mentioned above and thus are undesirable.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> HHDC</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> New code required to interrogate HHDR system and re-build a D0268. Procedural changes.</p> <p><b>Comments</b> This would appear to be low priority work to HHDCs.</p>	
<b>Association of Meter Operators</b>	No	<p><b>Comments:</b> At a TAA/ELEXON cost of some £30,000, plus the [20+] participant and DTC change costs, for 1000 TAA visits per year to receive data from two roles (HHMO &amp; HHDC) this seems an expensive solution.</p> <p>The current flexibility allows participants to provide data in whichever method is appropriate to themselves. Some participants will only be providing tens of sets of data each year (single figures per month), developing the DTC interface and operating is an expensive overhead. Some larger companies might see a benefit to invest in the system changes and operationally being able to 'press a button'.</p> <p>If the change was free I would suggest 1 &amp; 2 with option for participant to use whichever they wished. However, it seems an expensive solution to a problem.</p> <p>What has not been addressed in this DCP is whether the D0268 is actually what the TAA need. An HHDC sending the D0268 they have received from the HHMO indicates they have the same file, it does not demonstrate that the HHDC is using the information received in D0268, or whether they have translated the values in their retrieval system correctly.</p>	-
<b>Gemserv</b>	Neutral	<p><b>Option:</b> Neither</p> <p><b>Comments:</b> It depends on the urgency required for this DCP. As stated below option</p>	Yes

		<p>1 may well face significantly longer timescales due to the DTC changes needed. If this change needs to be made quickly, then option 2 should be chosen.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes (option 1), No (option 2)</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Option 1 would require a change to the MRA Data Transfer Catalogue (DTC) - to allow the D0268 flow to be sent over the DTN to the TAA.</p> <p><b>Implementation</b> Changes to DTC - Implementation timescales:</p> <ul style="list-style-type: none"> <li>• From point CP is submitted to MDB decision – approximately 1 month</li> <li>• From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and November).</li> <li>• 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.</li> </ul>	
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## **CP1248 v2.0 - Early release of Meter Technical Details by Non Half Hourly Meter Operator Agent**

### Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)</b>	<b>Agreement Yes/No</b>	<b>Days Required to Implement</b>
<b>Western Power Distribution</b>	LDSO / MOA	Yes	-
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	30
<b>IMServ Europe Ltd</b>		Yes	90
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	30
<b>British Energy Direct Limited</b>	Supplier	Yes	-
<b>CE Electric UK</b>	LDSO, UMSO	Yes	-
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Yes	-
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	No	270
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	No	-
<b>NPower Limited</b>	Supplier, Supplier Agents	No	-
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	No	120
<b>Association of Meter Operators</b>	Trade Association for Meter Operators	No	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	-
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Western Power Distribution	Agree in principle as we already send the data as soon as we can.	<p><b>Comments:</b> We don't "sit on" METD if we are capable of sending them. In our experience the main reason for delays is due to failures by other parties although the PARMS serials count these as a failure by us. This observation has already been passed to Elexon.</p> <p>It would be useful if the BSCP wording could reflect that we can only send METD if we have received them from the previous agent as, in some cases, we don't receive them despite sending D0170 requests. It would also be useful if the BSCP could reflect that when Suppliers send D0155 and D0148 at the same time, rather than waiting for a D0011 to trigger the D0148, it can prevent automatic sending of the METD which delays the process.</p>	No
Scottish and Southern Energy	Yes	<p><b>Option:</b> Neither</p> <p><b>Comments:</b></p> <p><b>Impact on Organisation's Systems and/or Processes?</b></p> <p><b>Impact on Organisation (e.g. systems/process changes)</b></p> <p><b>Implementation</b></p> <p><b>Comments</b></p>	
ScottishPower	Yes	<p><b>Comments:</b> Scottish Power support the change for the realisation of the benefits described within the CP. We believe this will result in improvements for the Supplier MOA and Customer</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier, MOA</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Process changes</p> <p><b>Comments</b> Though we do not anticipate system changes we would expect changes to be made to our internal processes.</p>	Yes
IMServ Europe Ltd	Yes	<p><b>Comments</b> Reduction from 10 wd to 5 wd should have no systems impact as long as flows are received in a timely fashion identifying other parties, as this is required in</p>	Yes

		<p>order to for the MOA to react by sending MTD. Changes will be required to the PARMS reports.</p> <p><b>Capacity in which Organisation is impacted - MOA</b></p> <p><b>Impact on Organisation</b> PARMS Reports require change as currently specified.</p> <p><b>Comments</b> Changes to PARMS reports are required.</p> <p><b>Other Comments:</b></p> <p>This change should have a beneficial impact on the timely transfer of MTD, leaving less time for inaccuracy due to interim change of configuration on site.</p>	
<b>TMA Data Management Ltd</b>	Yes	<p><b>Comments</b> As an NHHDCs agent the receipt of D0150/D0149 is critical for the set up of customer on the system. Ensuring that there is a common approach by all NHHMOA to submit the MTD within 5 working days of receipt of a D0148 will be beneficial for all concerned (MOA, Suppliers, LDSOs and NHHDC)</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> NHHDC</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Process</p>	Yes
<b>British Energy Direct Limited</b>	Yes	<p><b>Comments:</b> Agree although, uncertain if the proposed solution will resolve the existing issues that the proposer is experiencing.</p>	No
<b>CE Electric UK</b>	Yes	<p><b>Comments: Agree on the basis that this proposal will increase efficiency of the end to end process</b></p>	No
<b>E.ON UK Energy Services Limited</b>	Yes	<p>our current systems are compliant with this change</p>	No
<b>EDF Energy</b>	No	<p><b>Comments:</b> We feel that change as currently specified is likely to lead to more problems as NHH MOP will be working to different timescales depending upon process. Also we disagree with majority of benefits being claimed by this CP. One issue that causes problems is that MOP is unable to process a D0148. Under this change with only 2 days to resolve in many cases this will not be possible and Suppliers will be chasing MOPs so early for missing flows. However, MOP will already be aware of these and as such it will become a time wasting activity and as such will</p>	Yes

		<p>be an issue for MOPs. Many of other supplier and customer benefits mentioned are due to how suppliers register sites and if they do not use other data, such as D0311 flow, in their processes. As such we feel that these are not benefits that can be attributed with certainty to this CP and that many of these can be achieved by other methods currently in the market.</p> <p>We do though feel that changes are required in MOP operations but feel that this change is unworkable. There are still a number of scenarios where 10WDs are being allowed for transfer of MTDs. For example, in section 6.2.2.10 on a new connection, section 6.3.3.4 on a meter removal, section 6.3.4 on meter reconfiguration and many others. All of these scenarios could lead to types of problems being mentioned in this change, but these areas are just being ignored. We need to make timescales consistent for all NHH MOP activities and not a sub-section of them. There are also a number of processes that this change does not consider, for example appointment process. Should these also not be amended to be 5WDs as this is another area that would assist in reducing timescales, particularly where Suppliers are registering close to SSD. This change should also be introduced to HH MOPs to bring a single consistent process for both markets.</p> <p>We do see that there are problems, although we are concerned as to why those 17% of flows that have been received by Eon prior to them sending out any flow to that agent has not also been considered. These flows also indicate an agent that is acting in a non-compliant manner but this seems to be ignored as these would do not support benefits in this change, even though volumes are similar to those that are noted as being an issue with analysis presented as back up data to support this change. We assume that these flows occur because agent believes that they are still agent for an MPAN but they should not make such assumptions and this in particular could be considered as a breach of their obligations under BSC. We feel that these issues also need to be examined and agents required to stop sending flows prior to any request being made.</p> <p>In terms of PARMS reporting we would again suggest that NHH MOP processes should be aligned in terms of timescales and PARMS reporting with those for HH MOP. We believe that such changes would give rise to benefits in that MOPs that manage both NHH and HH meters can do so under one set of processes with just differences in flows sent and received. Such a change would also give rise to a swifter response with flows in NHH market which is main aim of this proposal. Given that both NHH and HH MOPs would be operating to same timelines we would consider that a change might be required that looks for 100% of metering information to be provided within</p>	
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		<p>10 days and not current 15 days allowed for in HH market and PARMS reporting. Further reporting should be put in place to ensure that no MOP sends meter technical details prior to a Supplier request. We feel that such an alignment would simplify MOP operations considerably leading to a much more effective overall market.</p> <p><b>Impact on Organisation's Systems and/or Processes? System Changes Implementation :</b> We would not be able to make such changes until November 2009 at earliest due to system changes required.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Yes, we cannot schedule these changes to make June release with other MOP changes for that release.</p>	
<b>AccuRead</b>	No	<p><b>Comments:</b> If these changes are to be put in place then there are wider ramifications that need to be considered. Such as Section 6.3 of BSCP514, and the timescales for returning jobs etc. This would make the timescales for returning jobs inconsistent within the BSCP514.</p>	Yes
<b>NPower Limited</b>	No	<p><b>Comments</b> For the vast majority of the scenarios, the reduction from 10 to 5 WDs is not actually an issue for us because the flow processes are already automated and meet this proposed revised deadline. However there are situations where 5 days would become unreasonable and for these reasons we oppose this as a standing target for all scenarios without qualification. Examples of this are:-</p> <p>Failed Flows</p> <p>Example: Concurrent Change of Supplier and NHHMOA</p> <p>Step 6.2.4.9 is obliging the new MOA to send MTD to parties within 5 days of receiving details from the old MOA. Occasionally these fail validation because the SSC/TPR combinations are invalid, the meter constant is incorrect or the meter manufacturer is not recognised. These issues need time to be resolved and 5 days would be unreasonable and would actually require the current 10 working days.</p> <p>Site Visits</p> <p>Example: Change Of Measurement Class HH to NHH - Sending Initial Readings. (7.3.18 &amp; 7.4.18)</p> <p>These processes involve site visits and utilising Field Engineers who undertake work as part of a manual process. Again it would be unreasonable to obtain all the data from site, verify the data and process it all within 5 working days.</p>	Yes

		<p>In summary the vast majority of flows already meet the proposed target but we would not want to see a formal reduction because of the minority of issues as detailed above that require time to resolve.</p> <p>We would be happy for a condition to be added to the BSCP to help qualify this to the effect 'if flow is valid' thus recognising the fact that the majority of MOAs will promptly forward data that does not require any manual attention to fix it.</p>	
<b>Siemens Metering Services</b>	No	<p><b>Comments:</b> Siemens Metering Services fail to see the benefit of this Change Proposal. The CP states that the majority of MOAs already issue the D149/ D150 approx two days after receipt of the D148. If the majority of agents are already performing to this standard, then we do not see the benefit of imposing additional costs for implementing this CP, to all agents.</p> <p>If some MOAs hold off sending the D149/ D150 until the Supplier Start Date, which may be 16 days later, this means that they would already be non-compliant with the current requirement to issue the MTD within 10 days. Reducing the timescale to 5 days would not change this. One would assume that these agents would already have open audit issues relating to delays in returning these flows, and therefore they should already be following the Error and Fault Resolution process to rectify it.</p> <p>The 'benefit' that Suppliers would only be chasing MOAs for genuinely stuck flows seems flawed. Within current timescales, there is time for some queries and issues to be resolved and the MTD still sent within the required 10 days. If this is reduced to 5 days, there would be less time for MOAs to resolve any issues and still be able to release the MTD within the required timescale. Therefore, this could lead to Suppliers chasing MOAs for more, rather than fewer flows, creating additional overheads on both parties.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted</b> MOA</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> System and Process changes would be required.</p> <p><b>Comments</b> This would be the timeframe required to develop, test and implement the system changes.</p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> If this CP is approved for the June release, the timescale for</p>	Yes

		implementing the change would be very tight, due to other system changes we currently have in development. Our preference (should this be approved) would be for a November Release.	
<b>Association of Meter Operators</b>	No	<b>Comments:</b> This does not appear to be a settlement issue, it is more an Agent Management issue. In the previous consultation, and other fora it is apparent that agents have designed their systems in different ways. If some agents are able to follow the approach described then Supplier's should be able to agree/negotiate SLA timescales with their <i>chosen</i> contracted agents, recognising the agent system design and business process constraints.	-

**CP1268 - Publication of new Funds Administration Agent (FAA) Service Description**

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	Yes	No
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
<b>NPower Limited</b>	Supplier, Supplier Agents	Yes	-
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	-
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Neutral	-
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	-
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Neutral	-
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
<b>ScottishPower</b>	Yes	<b>Comments:</b> Documentation Change Only	No

## CP1269 - Publication of Additional Non Half Hourly Combination Data in Market Domain Data

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Central Networks	Distributor	Yes	60
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	6-9 Months
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	270
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	90
British Energy Direct Limited	Supplier	Yes	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-
Electricity North West Ltd	LDSO	Yes	6 Months
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	182
Independent Power Networks	LDSO, UMSO, SMRA	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	No	180
Gemserv	MRASCo Ltd	Neutral	See comments
Western Power Distribution	LDSO / MOA	Neutral-	90
CE Electric UK	LDSO, UMSO	Neutral	-
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	90

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Central Networks	Yes	<b>Capacity in which Organisation is impacted:</b> Distributor <b>Impact on Organisation's Systems and/or Processes?</b> Distributor <b>Implementation</b> Dependant on full spec of new table when this is made available	

		Comments	
<b>Scottish and Southern Energy</b>	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Impacts on our Systems and Processes on decommissioning version 3. With cost implications.</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b></p> <p><b>Comments</b> This will also have an impact on the SONET.</p>	Yes
<b>ScottishPower</b>	Yes	<p><b>Comments:</b> We agree that the automated solution is the best way forward, as this enhanced version will contain the full MDD information in a single repository. We also agree that decommissioning version 003 is more appropriate as it will lessen the impact of the change on those parties who currently use version 002, while still providing an enhanced Market Domain Data Set.</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Systems will have to be reconfigured to accept the updated version of MDD and the D0269/D0270 flows.</p>	Yes
<b>TMA Data Management Ltd</b>	Yes	<p><b>Comments</b> As long as a high majority of Suppliers actually benefit from the changes</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b>NHHDC, HHDC, HHDA and NHHDA</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Systems</p> <p><b>Other Comments:</b> We do support the provision of additional data to enable registration data validation by Suppliers to avoid unnecessary flow rejection, however the rationale that the agents using V3 flows are more likely to be able to update their system easily is not acceptable. It is discrimination against the party agents that do use more recent software or have entered the market more recently. Does that mean that Elexon, in the future, will only support changes to the D0269/D0270 on the higher version number, ensuring that the same party agents are always impacted?</p>	Yes
<b>British Energy Direct Limited</b>	Yes	<p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p>	Yes

		<p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> System change to include new data</p>	
<b>AccuRead</b>	Yes	<p><b>Comments:</b> We agree with this change on the proviso that Version 2 of the D0269 is to remain the same</p>	No
<b>NPower Limited</b>	Yes	<p><b>Comments:</b> We agree with this change but we believe Elexon should look at the number of participants impacted by the de-commissioning of either version and the associated costs before making a decision.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Impact on Organisation</b> System and Process Impact.</p>	Yes
<b>Electricity North West Ltd</b>	Yes	<p><b>Capacity in which Organisation is impacted :</b> LDSO</p> <p><b>Impact on Organisation</b> yes</p> <p><b>Implementation at least 6 months from the date of approval of the change</b></p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> As stated above to implement the system changes involved would require at least six months.</p> <p><b>Comments:</b> Our systems currently use version 2 and version 3. Therefore which ever version is removed it will have an impact on our systems.</p>	Yes
<b>E.ON</b>	Yes	<p><b>Comments</b> This change would resolve the issues we face, E.ON are supportive of this change.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc) -</b> Supplier</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> System and Process</p> <p><b>Comments</b> Changes will need to be made to both processing of MDD flows (D0269 &amp; D0270) in order to store new information, and also to use of that new data within MDD calculation batches used for outgoing flows (D0205).</p>	Yes

<b>EDF Energy</b>	No	<p><b>Comments:</b> We do not agree with removing version 003 and introducing a version 004. This goes against the flow version numbering regime. We do not see why Suppliers and other agents should bear the costs of changing their systems that use version 003 of MDD just so that NHHDA and SVAA applications, under Elexon's control, remain unchanged. If this change is to go forward then NHHDA and SVAA applications should be upgraded to use either current version 003 or new version 004 and flow version numbering maintained in a logical manner.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier and NHHDC</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> System changes</p> <p><b>No. of Calendar Days</b> 180</p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> We feel that this date is achievable at present.</p>	Yes
<b>Gemserv</b>	Neutral	<p><b>Impact on Organisation's Systems and/or Processes?</b> There would need to be changes to the automated D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set' MDD flows for use by participant systems</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b></p> <p><b>Comments:</b> Changes to DTC - Implementation timescales:</p> <ul style="list-style-type: none"> <li>• From point CP is submitted to MDB decision – approximately 1 month</li> <li>• From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and November).</li> <li>• 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.</li> </ul>	Yes
<b>Western Power Distribution</b>	Neutral	<p><b>Comments:</b> If Parties will find it of use having this table in MDD then we agree that it should be included in the D0269/D0270 version 3. Having queried this change with Elexon we understand that SMRS will not need to be updated with the new table and will not be required to change existing validation rules; the new table will be for</p>	Yes

		reference purposes only. If this was not the case we would possibly oppose it on grounds of cost. <b>Impact on Organisation's Systems and/or Processes?</b> SMRA - Presumably we will need to populate and maintain the new table? <b>Impact on Organisation (e.g. systems/process changes)</b> <b>Implementation: 90 days</b> - To enable the necessary MDD forms to be prepared, approved and implemented.	
<b>Siemens Metering Services</b>	Neutral	<b>Capacity in which Organisation is impacted</b> DA, DC and MOA <b>Impact on Organisation</b> Process and potential system changes required <b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> No adverse impact	Yes

**CP1270 - Improvements to the Market Domain Data Process**

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Western Power Distribution	LDSO / MOA	Yes	30
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	30
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	-
British Energy Direct Limited	Supplier	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Yes	-
Independent Power Networks	LDSO, UMSO, SMRA	Yes	0
Gemserv	MRASCo Ltd	Neutral	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Western Power Distribution	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> LDSO / MOA <b>Impact on Organisation (e.g. systems/process changes)</b> Small procedural change <b>Implementation</b> : 30 day	Yes

<b>EDF Energy</b>	Yes	<b>Impact on Organisation (e.g. systems/process changes)</b> Processes	Yes
<b>ScottishPower</b>	Yes	<b>Comments:</b> We welcome the recommendations of the MDD Expert Group as we believe that this will bring further clarity to BSCP 509. <b>Impact on Organisation (Documentation Changes Only)</b>	Yes
<b>Independent Power Networks</b>	Yes	<b>Comments?</b> We would like to reiterate that we believe that that no MDD Change Proposal submitted by a party other than the LDSO, that affects the LDSO, should be considered without sign-off by the LDSO.  Though we will have the opportunity to comment through the change process, we would prefer to be consulted directly, rather than through the consultation stage of the process, considering the relevance to our MDD, charging statement, DUoS billing and the systems that support those processes.  There is already a large volume of documentation already in circulation and as a small company this takes a lot of time and resource to evaluate. We would therefore prefer to be consulted directly, rather than through the consultation stage of the process.  <b>Impact on process:</b>	Yes

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	SAIC	CP 1270 Attachment B	Page 11- MDD Entity 45 Form	L	Address Line 1 is identified as a mandatory field, however it would appear that Address Line 1 has been omitted from the form as it is currently shown as a blank line.

## CP1271 - Align Market Domain Data Approval Timetable to SVG meetings

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Western Power Distribution	LDSO / MOA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	-
British Energy Direct Limited	Supplier	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Yes	-
SSIL	HHDC	Yes	-
Gemserv	MRASCo Ltd	Neutral	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	
CE Electric UK	LDSO, UMSO	Neutral	-
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-
Independent Power Networks	LDSO, UMSO, SMRA	Neutral	

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
ScottishPower	Yes	<b>Comments:</b> Given that SVG currently approve MDD changes it seems eminently sensible to align the MDD approval process with the SVG Meeting dates.	No

<b>TMA Data Management Ltd</b>	Yes	<b>Comments</b> We support the change but regret that there is no clear information on the fast track for new market entrants as currently a new entrant can wait up to 2 months from PAB approval to MDD go live date.	No
<b>SSIL</b>	Yes	<b>Impact on Organisation Capacity:</b> Possible future MPID roles  <b>Comments:</b> Alignment to SVG meeting would seem sensible.	No

## CP1272 - Use of Appointment and Termination Flows in Unmetered Supplies (UMS)

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Central Networks	Distributor	Yes	30
Western Power Distribution	LDSO / MOA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	30
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	90
CE Electric UK	LDSO, UMSO	Yes	-
Independent Power Networks	LDSO, UMSO, SMRA	Yes	-
Power Data Associates Ltd	Meter Administrator	Yes, subject to	-
British Energy Direct Limited	Supplier	No	-
NPower Limited	Supplier, Supplier Agents	No	-
Genserv	MRASCo Ltd	Neutral	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Neutral	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Neutral	91
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Central Networks	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Alteration of processes and procedures	Yes

<b>Western Power Distribution</b>	Yes	<b>Comments:</b> Reflects our current process.	No
<b>EDF Energy</b>	Yes	<b>Comments:</b> This change addresses an issue that has been a concern for sometime. We feel that this removes issues with UMISO flows that can be mislaid/ignored as not sent via DTN. <b>Impact on Organisation's Systems and/or Processes?</b> Supplier <b>Impact on Organisation (e.g. systems/process changes)</b> Processes <b>Implementation</b> <b>Comments</b>	Yes
<b>ScottishPower</b>	Yes	<b>Comments:</b> ScottishPower strongly support the CP as it would remove the obligation to send and receive these flows which are superfluous to our day to day operation. As an UMISO we do not rely on receiving these flows as we acquire notification via MPRS. As a Supplier it is our experience that few if any UMISOs require these flows and as such the sending of them is not required. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted</b> Supplier, Distributor, NHHDA, NHHDC <b>Impact on Organisation (e.g. systems/process changes)</b> Changes to internal processes <b>Would implementation in the proposed Release have an adverse impact?</b> No	Yes
<b>Power Data Associates Ltd</b>	Yes, subject to	Subject to the changes proposed in CP1267 being agreed by industry. The alternative approach to CP1267 could work for UMISO, as this currently has a one-one relationship with the LDSO – although anything can change! The CP1267 alternative approach is not robust for MAs. SSE's comment on CP1267 indicates that the MPAS system would need to be reinstated. "...St Clements' estimate of 7.5k-10k to reinstate the processing of role codes 3 and 4 in MPRS. ...". The implication was that the functionality was there, but was taken out, presumably in error. When ECOES was reviewed for PDAL customers, there were some suppliers who had successfully updated MPAS with PDAL, yet PDAL	Yes

		<p>has only ever been defined in MDD as MA, never as an MOP. So it must have been changed recently.</p> <p>The impact of not recording the correct MA in MPAS is that on change of supplier the new supplier would have to find the MAs identity from another source. This is not robust, I have recently been aware of a customer who had advised the supplier of the appointed MAs (there were many MPANs) and the supplier failed to appoint the correct MA, causing that Supplier/customers a significant delay in obtaining settlement data.</p> <p>One reason this issue was raised was that one UMSO was hesitant to provide us with customer Inventories because PDAL had not been updated into MPAS. A reasonable confidentiality check by the UMSO. Which we clearly resolved by emails between the customer, the UMSO and ourselves. But all these issues take time and effort, and delay providing a quality service to customers, and potentially failing to provide data into settlements. With customers wondering why the industry can't get it sorted!</p> <p>The comment from one respondent about how does the LDSO know whether to expect a MOP or a MA, seems to forget that the MPAS system holds the Measurement Class. On loading the details it can simply review the Measurement Class, if MC=D then participant should be an MA (role code = 4) , if A, C or E then MO (role code = M), if MC=C then should be UMSO (role code = 3). This logic will already be there to a degree, and just needs enhancing for MA.</p> <p>Measurement Class Id    Measurement Class Description</p> <p>A            Non Half Hourly Metered</p> <p>B            Non Half Hourly Unmetered</p> <p>C            HH metered in 100kW Premises</p> <p>D            Half Hourly Unmetered</p> <p>E            HH metered not 100kW Premises</p> <p>It is frustrating that the LDSOs can't reinstate the functionality for 7.5-10k across the industry (assuming this figure is spread over 14 LDSOs less than £1k each).</p> <p>Resolving the changes to CP1267 to ensure MPRS holds the correct participant ID is essential to progression of this change. If the right data is not in MPRS then the LDSO cannot inform UMSO of agent appointments.</p>	
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<b>British Energy Direct Limited</b>	No	<p><b>Comments</b> The proposed solution does not outline the procedure which would prompt the UMSO to check the SMRS view, and forward the un-metered supply certificate. The supplier also needs confirmation from the MA of appointment.</p> <p>In sending the D0155, D0148 &amp; D0151 flows to the UMSO it allows the supply to trigger the UMSO for a certificate and acknowledgement from the MA.</p> <p>Supplier will be reliant upon the UMSO checking the SMRS view removes the prompt from the supplier to confirm that the view is correct. Attachment B does not outline the timescales to which the UMSO is expected to act. By aligning metered and unmetered processes by including UMSO/MA in the DTN would simplify the processes.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted</b> Supplier</p> <p><b>Impact on Organisation</b> Process</p>	Yes
<b>NPower Limited</b>	No	<p><b>Comments:</b> The D0155 data flow includes contractual references to supplier/UMSO contractual arrangements. The response to this flow (D0155) is acceptance of the contractual arrangements by the UMSO. The proposal introduces a third party, the LDSO, into the data transfer process and would make it more difficult to identify points of failure. If the UMSO wishes to utilise the MPAS data as a method of appointment should they not follow similar processes to that of the Data Aggregator. The appointment flow is via MPAS but the confirmation of contractual agreement is still via data flows external to MPAS flows. I.E. the D0153 and the D0011.</p> <p>How are contractual agreements to be managed before such a change is agreed. The UMSO is an agent of the supplier and some form of process is required to confirm that the 'appointment has been accepted and in accordance with a form of contractual agreement.</p> <p>Currently NPower systems automatically send an email to the UMSO in place of the D155, D151 and D148 flow and there may be a cost to remove this functionality.</p> <p><b>Impact:</b> System and Process Impact</p>	Yes
<b>E.ON</b>	Neutral	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier</p>	Yes

		Impact on Organisation : System Comments: System change will presumably be required to stop these flows being output automatically for UMS. Further analysis is needed to clarify level of change required.	
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**CP1273 - Changes to the scope of CoP10 to cover current transformer operated Meters**

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
<b>Western Power Distribution</b>	LDSO / MOA	Yes	30
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	30
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	-
<b>British Energy Direct Limited</b>	Supplier	Yes	-
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	Yes	90
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	90
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Yes	-
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Yes	30
<b>SSIL</b>	HHDC	Yes	
<b>NPower Limited</b>	Supplier, Supplier Agents	No	-
<b>Association of Meter Operators</b>	Trade Association for Meter Operators	No	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	Neutral	30
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Western Power Distribution	Yes	<b>Comments:</b> Documentation changes	Yes
ScottishPower	Yes	<b>Comments</b> ScottishPower are minded to support the proposed change. <b>Capacity in which Organisation is impacted :</b> MOA, Supplier Possible process changes	Yes
E.ON UK Energy Services Limited	Yes	<b>Comments:</b> This change would give expanded opportunity to use alternate suitable metering within the 70kw plus market profile class 5-8	Yes
Siemens Metering Services	Yes	<b>Impact:</b> minor process changes <b>Would implementation in the proposed Release have an adverse impact?</b> No adverse impact	Yes
SSIL	Yes	<b>Impact on Capacity:</b> HHDC/HHDA  <b>Comments:</b> Increases the potential use of low cost COP10 metering and extends the HH elective market hence increasing the proportion of HH related data into Settlement	No
NPower Limited	No	<b>Comments:</b> We appreciate the sentiment of the change in attempting to apply low cost metering in the Advanced market but based on the arguments below we need further assurance that has not been given in the proposal.  We <b>reject</b> this CP on the basis it does not go far enough to address the 'risk' associated to CT metering which is mitigated through Commissioning and Proving; both of these were excluded from the original CoP10. One of the advantages of CT metering being mandated to CoP5 only is that on a mandatory COMC the meter would	Yes

		<p>not necessarily need to be changed. The extension of CoP10 metering to include CTs may remove this potential benefit as the meter would have to be changed (although should be weighed against the cost of superior metering); under the existing arrangement CoP5 metering would be already installed on the site making the switch to HH much easier from a metering perspective.</p> <p>It also completely reverses the rationale behind the creation of CoP10 in the first instance - i.e. that lower standard metering and DC processes would not be sufficient for recording CT metered sites. More needs to be done to provide assurance that CT metering is recording accurately through the re-instating of, and potentially creation of new, processes removed from BSCPs under the original CoP10 before CoP10 can be extended to include CT metering.</p> <p>Furthermore, it creates significant problems for the HHDC to be able to identify CT sites traded as HH elective and is entirely reliant on the MOA populating the CT Ratio field in the D0268 to determine whether the site is CoP10 CT or CoP10 Whole Current. Essentially this CP could create two conflicting obligations in the same Code of Practice. This is not an acceptable position if the DC is required to conduct different validation checks on this metering. We would recommend that if the sentiment of this CP is to be fulfilled that a new Code of Practice would need to be created.</p> <p>Additional consideration should be given to the Reactive working group and how these requirements would fit into the proposed red-line of CoP10, if required (necessary to realise the LDSO wish to receive reactive interval data for CT metering).</p> <p>Finally, CoP10, including the assumptions and assertions made by the CoP10 working group, were accepted as valid when CoP10 was approved for release. It is evident that further work is required in light of recent changes (P230) but these requirements need to be more considered than simply extending CoP10 to include CT metering - the assumptions and risks concluded by the group should be re-visited before changes to the CoP10 document are progressed.</p> <p><b>Impact on Organisation</b> Process</p> <p><b>Impact on Capacity:</b> NNHDC, HHMOA, Supplier</p>	
<p><b>Association of Meter Operators</b></p>	<p>No</p>	<p><b>Comments:</b> The work to develop CoP10 considered the threshold for CoP10. It was agreed to limit the requirement to whole current meters. This gave the assurance that the metering would not go above the 100kW threshold – whole current meters are physically limited to passing 72kW.</p>	

		<p>The associated changes to BSCP502 allowed for CoP10 meters not to require a proving test. This was a cost reduction recognising that the major cause of settlement error was due to incorrect pulse multipliers – in a whole current meter the pulse multiplier would always be one. Increasing the scope of CoP10 to include CT meters would require this to be reconsidered, and changed. This CP does not address this issue.</p> <p>The other major driver was the practical constraint of keeping the meter below 100kW. The proposal of using CoP10 meters in the very narrow band of 70 to 100kW appears difficult to police. There is no practical barrier that will stop the customer load increasing above 100kW. Once above 100kW a CoP5 meter will be required (even with this change). This will involve the DC identifying that the customers consumption has increased above 100kW and requiring the MO/Customer to replace the meter. This adds cost to the MO/Customer. The requirement for the DC to identify over 100kW demand from a CoP10 metering installation would need to be added to BSCPs as a new activity. It can be assumed this would be added into the Supplier PARMs reporting and fine for over 100kW customer without CoP5 metering.</p> <p>What does not appear to have been considered is to leave CoP10 as current defined (whole current only) and to consider amending CoP5 to remove any 'non-settlement' requirements (such as number of relays). This may satisfy the commercial drivers behind this CP, without any loss of settlement accuracy.</p> <p>It should also be remembered that the Metering CoPs are not retrospectively applied. So existing metering in the 70-100kW range with HH data capability meets the Supplier licence obligations.</p>	
EDF Energy	Neutral	<p><b>Comments:</b> If this is agreed the implementation date of this CP is June 2009. PC 5-8 mandate comes into effect from 6<sup>th</sup> April 2009. This gives a problem if a CT meter has to be changed in this period. Our assumption is that a MOP would be forced to install CoP5 metering. However, we feel that Elexon should be more flexible to meet market requirements and allow for an implementation date of 6<sup>th</sup> April 2009 for this version of CoP10. There are precedences for such releases under MRA and as such we feel that Elexon should allow a CoP10 release on 6<sup>th</sup> April to enable MOPs to operate at this time on how they would do from June 2009 onwards and to support required government legislation. If that is not possible then we would request inclusion in February release with a change included in CoP10 to indicate that for CT metering new version should only be utilised from 6<sup>th</sup> April 2009 and until that time version 1.0 should be used. This is slightly messy but we feel that we must ensure</p>	Yes

		<p>that enduring process for CT metering changes in PC 5-8 is available from 6<sup>th</sup> April 2009.</p> <p>If neither of these are possible we would like to understand how as NHH MOP we can fit CoP10 meters fro CT metering from 6<sup>th</sup> April without any issues as this is enduring solution for this metering.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> NHH MOP</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Processes</p> <p><b>Implementation</b> We are concerned that two different sets of rules might need to be introduced due to Elexon release schedules and would recommend that this is not the case.</p>	
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## CP1274 - Transfer of Meter Technical Details

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
<b>Western Power Distribution</b>	LDSO / MOA	Yes	-
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	3-6 Months
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	Yes	30
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	60
<b>IMServ Europe Ltd</b>	HHDC, MOA	Yes	182-365
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	30
<b>British Energy Direct Limited</b>	Supplier	Yes	-
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	Yes	90
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	91
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Yes	
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Yes	90
<b>SSIL</b>	HHDC	Yes	-
<b>OnStream</b>	Meter Asset Provider and Meter Operator, NHHDC and NHHDA.	Yes	-
<b>NPower Limited</b>	Supplier, Supplier Agents	No	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	-
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-
<b>Association of Meter Operators</b>	Trade Association for Meter Operators	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
<b>Western Power Distribution</b>	Yes	<b>Comments:</b> Our existing procedures for NHH "comms" data will comply with the amended BSCP	No
<b>EDF Energy</b>	Yes	<p><b>Comments:</b> Currently on winning a site the new MOP will receive the communications type and number via the AIM spreadsheet.</p> <p>Depending upon enduring solution is it possible if the old MOP is proactive they could shortly thereafter terminate that communication line. If so then new MOP needs to know who the provider is so that they can arrange the transfer of the line into their name (and potentially change the provider if they have no contract with the existing provider) before the line is cancelled. At present we are not sure if this is a possible process and feel that this issue needs to be considered. It would also be useful if some guidelines (and a process?) were put into place to identify how the transfer of these lines would take place, together with reasonable timescales to allow for the transfer of ownership to take place before a line/SIM is cancelled, if this is an issue. We feel that this issue needs to be considered when further details of enduring solution is known.</p> <p><b>Impact on Organisation's Systems and/or Processes? NHH MOP</b>  <b>Impact on Organisation (e.g. systems/process changes) Process Implementation</b>  <b>Comments</b></p>	Yes
<b>ScottishPower</b>	Yes	<p><b>Comments</b> ScottishPower believe that the proposed change will help facilitate the smooth operation of advanced metering and ensure that the appropriate details are exchanged between Parties and Agents as and when necessary.</p> <p>Furthermore, the CP will help facilitate the developments being pursued at the MRA IREG forum as and when they are introduced to the sector</p> <p><b>Impact on Organisation's Systems and/or Processes? Yes</b>  <b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b>  Supplier, NNHDC, HHDC, MOA  <b>Impact on Organisation (e.g. systems/process changes)</b> Internal processes</p>	Yes

		<p>will be impacted by the change and there is a possibility that system changes may be required to implement the exchange of such data. However, we would expect this to occur via the various changes that are currently being discussed and progressed throughout the industry in relation to advanced metering</p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> No</p>	
<b>IMServ Europe Ltd</b>	Yes	<p><b>Comments</b> Strongly agree with this change proposal as it will reduce the incidents of faults and site visits for the MOA as a result of missing meter comms details</p> <p><b>Capacity in which Organisation is impacted</b> - MOA to send comms details in DTN Flow, and DC in being able to receive and process comms details in a DTN Flow.</p> <p><b>Impact on Organisation:</b> Systems and internal process will be impacted.</p> <p><b>Comments</b> Changes have to be specified through the Wheatley MOP Consortium necessitating a lead time of between 6 and 12 months from the time of the change details being approved.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b>No, although should additional flows be specified then extra controls would be required to ensure that flows are co ordinated as required in both sending and receiving.</p> <p><b>Other Comments:</b> It would appear sensible to modify the existing MTD flows to incorporate the new details, particularly as much of it already exists in the outline structure as 'Not currently used'. Use of a new flow or manual processes, would result in more complex and expensive solutions to implement.</p>	Yes
<b>TMA Data Management Ltd</b>	Yes	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted;</b> NHHDC</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Processes</p> <p><b>Other Comments :</b> We agree to this change with the understanding that this is a temporary measure until an enduring solution using DTC transfer is agreed and progressed. Relying on manual process to obtain critical data is not and cannot be a long-term solution.</p>	Yes

<b>British Energy Direct Limited</b>	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted - Supplier</b> <b>Impact on Organisation (e.g. systems/process changes)</b> Systems & Processes	Yes
<b>E.ON</b>	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted</b> Supplier <b>Impact on Organisation (e.g. systems/process changes)</b> System <b>Comments</b> System changes will be required to store new information.	Yes
<b>E.ON UK Energy Services Limited</b>	Yes	<b>Comments:</b> This will facilitate COA process within the Advanced metering environment. <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted:</b> MOA <b>Impact:</b> Systems and processes will require development	Yes
<b>Siemens Metering Services</b>	Yes	<b>Comments:</b> Whilst Siemens Metering Services agree that there is a need for communications and password details to be transferred, we would prefer that the implementation of this CP is aligned to the implementation of the DTC change currently being drafted. It is our understanding that a new data flow will be created, that will be used to supplement the D150 and D268, and would contain the additional comms details. Our preference would be that implementation of CP1274 is aligned to this DTC change, so that there is a formal means by which this data can be provided (i.e. via the DTC). <b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> MOA, DC <b>Impact on Organisation:</b> This would have process and potential system changes.	Yes
<b>SSIL</b>	Yes	<b>Comment:</b> Agree with this, but a more specific standard (format and content) is required in the longer term to ensure true inter-operability.	No
<b>OnStream</b>	Yes	<b>Comments:</b> OnStream believe that the amendment is sensible although the impacts upon existing processes and systems will be dependant upon the method of	Yes

		<p>implementation and the exact information to be provided. OnStream note the solution will not be appropriate unless change proposal 1275 (CP1275) is implemented as without this whilst parties will have the technical information this will be unusable without the appropriate protocols.</p> <p>The level of accessibility to the meter will also need to be determined and guidance provided as whilst provision of passwords and communications information is vital to enable interoperability within the market, 3<sup>rd</sup> party access to assets may need to be restricted to enabling readings and providing tariff updates etc. There is potential that the asset owner will remain responsible for software updates to the meter, unless commercial agreements can be agreed to cover the risk if 3<sup>rd</sup> parties carry out upgrades on assets they do not own which may result in failure or requirement to visit the site.</p> <p><b>Impact:</b> OnStream will be impacted as a Meter Operator, and as NHHDC.</p> <p>OnStream will need to make systems changes to facilitate the provision of additional information either in the form of changing systems rules if existing D0150 is implemented as the solution or for development of systems if a new data flow is created.</p> <p>As a Meter Asset Provider, OnStream may also be impacted in terms of 3rd parties accessing meters and hence may need to make systems and processes changes to ensure assets remain robust where 3rd parties potentially update software remotely.</p>	
NPower Limited	No	<p><b>Impact on Organisation's Systems and/or Processes? Yes</b></p> <p><b>Capacity in which Organisation is impacted ( Supplier, NHHDC, NHHMOA</b></p> <p><b>Impact on Organisation :</b>System and Process Impact</p> <p><b>Comments:</b> Elexon may wish to consider using a different definition of MTDs for MOAs and DCs. For consistency across HH and NHH, and DC and MOA it is desirable that all definitions of MTDs in all documents should state something like "all information required for DCs to remotely retrieve" and "MOAs to remotely configure"</p> <p>MTDs should not just be defined as "any information that is required by the DC to remotely retrieve data from the meter" as this excludes MOA owned data items e.g. Level 3 password required to reprogramme the meter - the transfer of which is critical to interoperability to realise the goal of not changing a meter on a change of agent.</p>	Yes

<b>Gemserv</b>	Neutral	<b>Comments:</b> Perhaps. If this change is contingent on the work being done at the special IREG, this change may be more suitable for the November 2009 Release.	
<b>Association of Meter Operators</b>	Neutral	<b>Comments:</b> Not convinced this change actually adds anything that isn't already implicit.  Data may not always be passed from MO to DC, or MO to MO, where there are commercial contracts in place between parties, eg Customer/MO where passing data to another MO would be inappropriate. This has been common practice in the HH market since 1994, and will continue, irrespective of these changes. The commercial reality was recognised at the Advance Metering Forum in Nov08.	-

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	OnStream	CP1274 redline changes to BSCP504 v20.1 conformed	P3 para 2	M	<p>As it stands the paragraph wording is very open</p> <p><i>“For NHH Metering Systems that can be read remotely, this also includes all appropriate information required by the NHHDC to retrieve data from the Metering System remotely. This may include, but is not limited to, the communications and security details of the Metering System and the Code of Practice of the Metering System installed.”</i></p> <p>This may result in detailed discussions between meter operators and data collectors to determine what is required, which may be avoided with greater clarity on requirements.</p> <p>The NHHDC requires access to the metering system to retrieve reads</p>

					to meet responsibilities or may arrange this through a Data Retriever (DR) However whilst access to read information may be required by the NHHDC, meter operators will also require access to carry out 'Smart' metering functions such as software updates, this may result in various layers of access/protocols being required. This may not impact this change proposal but may impact on the proposal in future.
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## CP1275 - Supplier Agents - Access to Meter Protocols

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
<b>Western Power Distribution</b>	LDSO / MOA	Yes	-
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	Yes	30
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	60
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	60
<b>British Energy Direct Limited</b>	Supplier	Yes	-
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	Yes	-
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	Yes	-
<b>SSIL</b>	HHDC	Yes	-
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	No	-
<b>NPower Limited</b>	Supplier, Supplier Agents	No	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	-
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	-
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-
<b>OnStream</b>	Meter Asset Provider and Meter Operator, NHHDC and NHHDA.	Neutral	-
<b>Association of Meter Operators</b>	Trade Association for Meter Operators	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
EDF Energy	Yes	<p><b>Comments:</b> If any meter is already compliant how are details of meter protocols to be made available for those meters.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> NHH MOP, NHHDC and DR</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Process</p>	Yes
ScottishPower	Yes	<p><b>Comments</b> ScottishPower believe such a change is essential for the smooth operation of the Change of Supplier process where advanced metering is used.</p> <p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier, MOA, NHHDC, HHDC</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> Internal processes would need to be adapted</p> <p><b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> No</p> <p><b>Other Comments:</b> ScottishPower believes that the CP does not give adequate consideration to what mechanisms should be in place in order to facilitate the provision of required data. Though ScottishPower support the change further consideration should be given to the process to enable the introduction of the change proposal.</p>	Yes
TMA Data Management Ltd	Yes	<p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> NHHDC, HHDC</p> <p><b>Impact on Organisation</b> Processes</p> <p><b>Comments:</b> To ensure that all party agents are aware that a new compliance</p>	Yes

		approval is taking place, could you please confirm that it will be circulated either via the Elexon news letter or other means of communications and also that Party agents can contact Elexon to confirm the contact name and details of the Meter Manufacturer in order to request the meter protocol. The change is helpful in the face of the prospect of more Smart meter devices, but it is also helpful, anyway, as an improvement to processes for new meters in the existing HH market. This supports the BSC objective for an efficient market ( by removing esoteric aspects of managing new protocols.)	
<b>British Energy Direct Limited</b>	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Yes <b>Capacity in which Organisation is impacted - Supplier</b> <b>Impact on Organisation (e.g. systems/process changes)</b> Systems & Processes	Yes
<b>E.ON UK Energy Services Limited</b>	Yes	Comments: Access to protocols is essential to interoperability in the market.	-
<b>SSIL</b>	Yes	<b>Comments:</b> Agree as it furthers inter-operability and competition.	No
<b>Scottish and Southern Energy</b>	No	<b>Comments:</b> We support the objective of supplier agents having access to Meter Protocols. However, further clarification is needed as to whom the Meter Manufacturer makes the protocols available. DCP0039 to which the industry responded favourably proposed that the manufacturer should make them available to Suppliers, but this CP1275 is proposing providing the protocols to the BSC parties via their Party agents. We agree with the change as proposed in DCP0039. <b>Impact on Organisation (e.g. systems/process changes)</b> It is difficult to determine the impact. It all depends on how the information is made available and how any changes to that information are managed. <b>Comments</b> How are these protocols to be communicated? And are the Meter Manufacturers charging for this provision?	No
<b>NPower Limited</b>	No	<b>Comments:</b> For Npower to agree to this change we would like to see additional wording added into the BSCP601 "access to outstation protocols" should be extended to "outstation protocols and Meter	Yes

		Manufacturer's software" on the basis that if the MOA (and/or DC) does not have the opportunity to purchase/rent/licence the software, they will be unable to access the meter either for retrieval or configuration. Without mandating the obligation to provide software interoperability will be compromised.	
<b>OnStream</b>	Neutral	<b>Comments:</b> OnStream as an agent to suppliers in terms of provision of metering services will be required to purchase assets from manufacturers alongside agreements with the manufacturer to provide protocols. OnStream are supportive of this change due to the benefits provided from improved interoperability.	No
<b>Association of Meter Operators</b>	Neutral	<b>Comments:</b> Meter Manufacturers may have issues with this, at the Advanced Metering Forum there were questions raised about definition, and how practical this really was.	-

**CP1276 - Process following the Installation of Small Scale Third Party Generating Plant (Alternative to CP1260 'Meter Investigation Process 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 Yes/No	Days Required to Implement
<b>Scottish and Southern Energy</b>	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
<b>IMServ Europe Ltd</b>	HHDC, MOA	Yes	90
<b>TMA Data Management Ltd</b>	HHDC, HHDA, NHHDC and NHHDA	Yes	60
<b>Siemens Metering Services</b>	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Yes	0
<b>EDF Energy</b>	Supplier, NHH Agent and HH MOP	No	270
<b>ScottishPower</b>	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	90
<b>British Energy Direct Limited</b>	Supplier	No	-
<b>AccuRead</b>	NHHDC, NHHDA, NHHMOP, HHMOP	No	90
<b>E.ON</b>	Supplier – NORW, EELC, EENG, EMEB, PGEN	No	91
<b>E.ON UK Energy Services Limited</b>	MOA NHHDC /DA	No	-
<b>Gemserv</b>	MRASCo Ltd	Neutral	-
<b>CE Electric UK</b>	LDSO, UMSO	Neutral	-
<b>Electricity North West Ltd</b>	LDSO	Neutral	-
<b>Independent Power Networks</b>	LDSO, UMSO, SMRA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
<b>IMServ Europe Ltd</b>	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> MOP <b>Impact on Organisation (e.g. systems/process changes)</b> Process changes <b>Implementation</b>	Yes

		Comments	
<b>TMA Data Management Ltd</b>	Yes	<b>Capacity in which Organisation is impacted</b> - NHHDC <b>Impact on Organisation (e.g. systems/process changes)</b> Processes	Yes
<b>Siemens Metering Services</b>	Yes	<b>Comments:</b> SMS strongly favour CP1276 over CP1260. We feel this solution is more appropriate, offering a more flexible solution by not mandating a site visit.  As per our previous responses to CP1260, we believe that the D1 flow would not be suitable for requesting a site visit. However, with CP1276, as the request is specifically to visit the site and change the meter, we agree that the D142 is the appropriate flow to use.  <b>Capacity in which Organisation is impacted :</b> MOA  <b>Impact on Organisation</b> Minimal impact on current processes.  <b>Other Comments:</b> We would like to request that when Suppliers send the D142 to the MO, when populating the Additional Information free text field, they specify that it is for an import/ export site.	Yes
<b>EDF Energy</b>	No	<b>Comments:</b> We would also like to see a process whereby information on if a meter has a backstop is included in relevant data flows, such as a D0150 to give a better long term solution to this issue. We think this could be done by utilising one of the current null data item and replacing with a new data item.  We do not feel that use of a D0142 to initiate request to MOP is appropriate. Using a D0142 will mean more changes for MOP and these are not required if D0001 is used. What we are doing here is carrying out a meter investigation and as such a D0001 should be trigger. We feel that most of problems with CP 1260 revolved around process taking current method of responding to a D0001 always with a D0002, such that if a meter change occurred then this as well as a D0002 would be sent. We feel that if CP 1276 had send D0001 using new site visit check code that Suppliers receive from LDSOs on a D0001 at step 6.3.61 and remaining steps as per current version of CP 1276 then this would be best solution and not require D0142 MOP processes to be	Yes

		<p>re-worked.</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier and NHH MOP</p> <p><b>Impact on Organisation (e.g. systems/process changes)</b> System and processes</p> <p><b>Implementation</b> We do not feel that changes to our systems could be developed in this time frame, particularly those of D0142 MOP processing. We would need to put in an interim solution and do not feel that this is required if a D0001 was used between Supplier and MOP.</p>	
<b>ScottishPower</b>	No	<p><b>Comments:</b> Please also refer to the CPC5651 Addendum document for further analysis and comments</p> <p>ScottishPower does not believe that CP1276 offers any benefit over the original CP1260.</p> <p>Furthermore, ScottishPower feels that point A of the proposed solution is not appropriate in the CP's current form and question whether Suppliers would hold this information other than via informal channels and that it should in all cases be sourced from the MOA who would have the definitive answer to the question posed; is there a backstop fitted on the meter?</p> <p>The use of the D0142 though also an appropriate flow would suggest that a meter replacement would in all cases be necessary. ScottishPower would suggest that this may not be the case though figures are difficult to ascertain at this time.</p> <p>To summarise ScottishPower sees no benefit of supporting this CP over the original CP1260 and on this basis and the points made above reject CP1276.</p> <p>However, within the addendum ScottishPower has included a modified variant to CP1276 which if progressed would give CP1276 advantages over CP1260.</p> <p><b>Capacity in which Organisation is impacted</b> Supplier, MOA</p> <p><b>Impact on Organisation:</b> Process changes and possible system changes</p> <p><b>Other Comments:</b> ScottishPower feels that both CP1260 and CP1276 are striving to find a solution for a problem which will not exist in the near future Since BERR</p>	Yes

		<p>mandated the use of Smart Metering for domestic customers by 2020 the problem will be resolved with the introduction of such meters. Furthermore, domestic sites with micro generation installed would be the likely candidates to be the first recipients of these meters and thus these sites will be switched to smart metering long before the 2020 deadline.</p> <p>Additionally, there is no evidence to illustrate that these sites are actually spilling energy onto the network and any amounts which they may be spilling would appear to be minimal if you consider that firstly only around 60 are traded using P81 within GB and that most installations do not have a large generation capacity, some averaging 500W at best. Would the costs of investigating such sites using CP1260 or CP1276 actually cost more than the energy being spilled? ScottishPower would suggest that it would cost significantly more to do such site visits and thus there is no strong economic case for such a change. If such sites are spilling significant amounts of excess energy then surely they would already be traded using the existing arrangements under P81.</p> <p>In light of this it may be prudent to consider whether we even need to progress either change at this time</p>	
<b>British Energy Direct Limited</b>	No	<p><b>Comments</b> Without an initial MOP investigation we would question how a supplier would identify if a backstop exists. Also a D0142 could be taken as an instruction to install new metering regardless of whether it is required.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted</b> Supplier</p> <p><b>Impact on Organisation</b> Processes</p>	Yes
<b>AccuRead</b>	No	<p><b>Option:</b></p> <p><b>Comments:</b> The change is too generic and does not address the issue. The CP needs at least to include a solution for what needs to happen and what flows would need to be exchanged in the result of a site visit where it is concluded that no change to the meter is necessary.</p> <p>It might also be worth noting that the third bullet point in the 'Proposed Solution' does not indicate that the NHHDC needs the MTD and that the read would be validated first</p>	No

		in the usual fashion and not as indicated, sent directly to the Import supplier.	
<b>E.ON</b>	No	<p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc)</b> Supplier/MOP</p> <p><b>Impact on Organisation:</b> System</p> <p><b>Comments</b> Depending on volumes &amp; the operational business requirements, this is likely to require either a system change or a change to manual processes in order to output the flows.</p>	Yes
<b>CE Electric UK</b>	Neutral	<p><b>Comments:</b> CE are neutral on this, however we feel that one of the solutions should be implemented based on the fact that we are in the process of implementing work arounds to facilitate CP1259 which would be deemed a pointless act if there was no follow up.</p>	No
<b>Electricity North West Ltd</b>	Neutral	<b>Impact on Organisation's Systems and/or Processes?</b> Yes	-
<b>Independent Power Networks</b>	Neutral	<p><b>Comments:</b> We are neutral to either the implementation of 1276 or 1260. In either case we will be required to send a D0001 and it is the consequential process that differs between the two proposals.</p>	No

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/C oPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	<b>Electricity North West Ltd</b>	BSCP514	6.3.6.4	L	the MOP will have to send the new Meter Details (D0149/150) to the NHHDC and the LDSO, on the redlined document it only mentions the Supplier.

## CP1277 - Change to UMS Charge code Approval Process

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Central Networks	Distributor	Yes	30
Western Power Distribution	LDSO / MOA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	-
British Energy Direct Limited	Supplier	Yes	-
NPower Limited	Supplier, Supplier Agents	Yes	-
CE Electric UK	LDSO, UMSO	Yes	-
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	-
Independent Power Networks	LDSO, UMSO, SMRA	Yes	-
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	30
Power Data Associates Ltd	Meter Administrator	No	-
Gemserv	MRASCo Ltd	Neutral	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Central Networks	Yes	<b>Impact on Organisation's Systems and/or Processes?</b> Change of procedures and processes	Yes

<b>NPower Limited</b>	Yes	Process Impact Only	Yes
<b>ScottishPower</b>	No	<p><b>Comments</b> Though the CP raises a valid issue in regards to how long it can take for a charge code to be approved ScottishPower feel that the CP does not offer a satisfactory solution to the problem and that there may be a simpler solution which would maintain the current structure whilst putting in place processes which would speed up the approval process.</p> <p>It is our belief that the current process though somewhat cumbersome is effective, robust and by and large works. MDD has a limited distribution and may not have a wide enough audience for such an important area of UMS. Furthermore, responses to MDD consultations is at times patchy at best, running the risk that changes could be approved without due diligence.</p> <p>Furthermore, the structure of sub-committees exists to filter down decisions to experts in the particular field to assist the higher authorities (SVG &amp; Panel) to make informed decisions. Removing the role of UMSUG in the approval process would remove this stage and put a greater onus on SVG to understand technical papers without the recommendations of UMSUG to assist in making such decisions.</p> <p>Therefore we believe that the current process should be maintained though there is a case for adaptation to speed the process up. ScottishPower propose that rather than changing the process as suggested in this CP or increasing the frequency of UMSUG meetings, pending charge codes could be provided to UMSUG members outside of the actual meeting dates requesting feedback on changes. These could then be passed to the next available SVG meeting with the recommendations of UMSUG members. Where a change is controversial its application could be passed to the UMSUG meeting for further discussion.</p> <p>We believe this would maintain the robustness of the current process whilst cutting the time taken to process new charge codes for the wider UMS community.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No. There would be no adverse impact caused by the implementation</p>	No
<b>Power Data Associates Ltd</b>	No	I agree with the general intent of the proposal (improve the process), but not the implementation.	-

		<p>The use of temporary and provisional codes must continue. These are needed to allow equipment, which is often already connected and consuming energy (at the time of the application) to be reflected in settlement, supplier and DUoS charges.</p> <p>Whilst I agree the process would benefit from revision as the current process is very labour intensive the change proposes taking UMSUG out of the consideration of new codes and leave the BSCCo with seeking assistance from 'industry experts'. While this is good when industry experts contribute it does not allow for the breadth of views expressed at UMSUG, particularly from customer and manufacturer representatives who often have a very different perspective from the 'electricity industry'. There have been great strides from ELEXON in improving the code application process which has greatly improved the approval process, yet the recent UMSUG meetings have highlighted issues and changes which had not been identified by 'industry experts'.</p> <p>I would suggest a wider review of the approval process using the resources of the combined UMSEG &amp; MAEG to review the approval process. This review should reduce bureaucracy, speed the process, but also address some of the issues that have not been addressed, including</p> <ul style="list-style-type: none"> <li>• Of the many temporary codes have been in existence for years, without manufacturers providing test data – there needs to be a mechanism to chase for a this further detail, it has been suggested that the chargeable watts should increase where this information has not been provided.</li> <li>• Does all equipment need to have a code approved? There are many different codes where equipment has been given a code by the UMSO without formal approval, eg town clock – these are one off pieces of equipment which a pragmatic solution should be recognised. Similarly, generic equipment like traffic signal controllers have a variety of wattages, does each combination of equipment need separate approval.</li> </ul> <p>I would suggest these issues are packaged and consider together.</p>	
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## CP1278 - Streamlining the SVA Standing Data Change Process

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement Yes/No	Days Required to Implement
Gemserv	MRASCo Ltd	Neutral	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	10
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	-
British Energy Direct Limited	Supplier	Yes	-
AccuRead	NHHDC, NHHDA, NHHMOP, HHMOP	Neutral	-
NPower Limited	Supplier, Supplier Agents	Yes	-
CE Electric UK	LDSO, UMSO	Neutral	-
E.ON	Supplier – NORW, EELC, EENG, EMEB, PGEN	Yes	30
E.ON UK Energy Services Limited	MOA NHHDC /DA	Neutral	-
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-
Independent Power Networks	LDSO, UMSO, SMRA	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
EDF Energy	Yes	<p><b>Impact on Organisation's Systems and/or Processes? (Please delete as appropriate)</b> Yes</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier</p> <p><b>Impact on Organisation:</b> Process</p>	Yes

<b>ScottishPower</b>	Yes	Document changes only	No
<b>TMA Data Management Ltd</b>	Yes	<b>Comments</b> This is a very positive change to remove an unnecessary paper based process	No
<b>NPower Limited</b>	Yes	<b>Impact:</b> Some minor changes to processes will be required <b>Other Comments:</b> Could you please confirm that this process is no different for newly accredited DC/DA's? i.e. that the P31/32 documents are not required	Yes
<b>British Energy Direct Limited</b>	Yes	<b>Capacity in which Organisation is impacted</b> Process	Yes