

CPC00629 – Impact Assessment Responses for DCP0029, CP1233, CP1234, CP1235 and CP1236.

DCP0029 - Recommendations of the Unmetered Supplies Expert Group

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement					
		Part 1 – Proposals Arising (✓/X)					Part 2 - Actions Arising (✓/X)
		1.4	2.5	A2.0	A2.2	3.1	
United Utilities	HH & NHH MOP- NORW & UUNL id's	✓	✓	✓	✓	✓	✓
Central Networks East plc and Central Networks West plc	UMSO	✓	✓	✓	✓	✓	✓
Western Power Distribution	Distribution/Meter Operator UMSO	✓	✓	✓	✓	✓	✓
CE Electric UK – NEDL & YEDL	LDSO, UMSO	✓	✓/ X	-	-	✓	✓
Lowri Beck	NHHMO, NHHDC	-	✓	✓	✓	✓	✓
ScottishPower	Supplier , Distributor, HHDC, HHDA, NHHDA , NHHDC , UMSO , Meter Operator	Dependent	X	✓	✓	✓	✓
IMServ Europe	NHHDC , NHHDA	-	X	-	-	✓	-
RWE npower	Supplier , Supplier Agent	X	✓	✓	✓	✓	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	X	✓	-	✓	X	✓
AccuRead Ltd	NHHDC, NHHDA, MoP	-	✓	-	✓	✓	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent, Supplier	X	X	✓	✓	X	X
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, NHHDC, HHMOA, NHHMOA	-	-	-	-	-	-
Siemens Energy Services	NHHDC, HHDC, NHHDA, HHMO, NHHMO, MA	✓	✓	✓	✓	✓	X
EDF Energy Networks	LDSO, UMSO	✓	✓	✓	✓	✓	✓
E.ON Energy Ltd	Supplier	-	-	-	-	-	-

Detailed Impact Assessment Responses

Organisation	Agreement					Part 2 - Actions Arising (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
United Utilities	✓	✓	✓	✓	✓	✓	-	X	-
Central Networks East plc and Central Networks West plc	✓	✓	✓	✓	✓	✓	<p>1.4 comment: Evidence of basis of increase in EAC needs to be retained.</p> <p>A2.2 comment: Agreed that D0139 from UMISO to NHHDC is not appropriate.</p> <p>Favoured option: A,</p> <p>Comment: Would also accept “b”, but would reject “c” as the flow achieves little.</p> <p>3.1 Favoured Option: A</p> <p>Impact: Minimal changes to existing processes.</p>		Immediate
Western Power Distribution	✓	✓	✓	✓	✓	✓	<p>A2.0 Comment: This will have an impact on WPD UMISO system to calculate EACs</p> <p>A2.2. Comment: Our experience with manual flows has shown that it is hit or miss whether they are actioned. Our preference would be to automate this flow via DTN.</p> <p>Favoured option: C</p> <p>Comment: Option C should be modified to include Suppliers and</p>	✓	300

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>NHHDCs</p> <p>3.1 Comment: It is mandatory for the UMSO to send annualised EAC spreadsheet P0218, so our preference would be to make this report mandatory on the HHDA.</p> <p>Favoured Option: C</p> <p>Part 2 – Actions Arising Comment: WPD agrees with walkthrough comments</p> <p>Implementation: WPD preference would be for FEB 2009 release</p>			
CE Electric UK – NEDL & YEDL	✓	✓/X	-	-	✓	<p>1.4 Comment: There are currently no incentives for customers to submit inventories and no clear guidance for UMSOs on the action to take if customers do not provide inventories. The UMSO can only pursue customers that have a connection agreement however there is an industry issue where some legacy customers do not have connection agreements in place so for these customers there is no way of enforcing inventory submissions. Allowing the UMSO to increase EACs would incentivise customers to provide regular inventory updates and allows the UMSO to recover units in line with growth</p>	✓	-	

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	1.4	2.5	A2.0	A2.2	3.1				
						<p>(for example) for those customers that are still refusing to provide updates.</p> <p>2.5 Comment:</p> <p><i>On receipt of backdated D0052s from UMSO the NHHDC should overwrite the previous EAC – Agree change</i></p> <p><i>On sending backdated D0052s, UMSO must re-send in the correct order if they do not wish to overwrite previously-supplies EACs – Agree change</i></p> <p><i>D0052s backdated over 14 months should be amended by the UMSO to the earliest effective from date for which a Final Reconciliation Settlement Run has not taken place. – Disagree with change. There are no timescales on the NHHDC for processing the D0052s therefore the date that the UMSO provides in the D0052 may expire and the D0052 become invalid. This would result in rejections and the D0052 would require sending again, which again could potentially be rejected. We suggest that the NHHDC amends the EFD to the earliest effective date for which a Final</i></p>			

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>Reconciliation Settlement Run has not taken place when processing the D0052 as it would minimise the number of rejections due to effective dates which is currently an industry issue. Another solution would be to apply timescales on the NHHDC for the processing of D0052s, i.e. D0052s must be processed by the NHHDC within 1 working day of receipt from the UMSO. If timescales were in place the UMSO would be able to populate the D0052 with an EFD that could be accepted.</p> <p>A2.2 Favoured Option: A or B</p> <p>Comment: A/B - SMRS is the master registration database and all systems should be aligned with this main source. At present we do not receive any D0134s or send any D0139s, all changes are undertaken by the supplier in SMRS.</p> <p>B - We reject the proposal of the modification of the D0139 to be sent over the DTN due to the problems incurred when the D0052 flow was modified to become a DTN flow. Also, we do not receive any D0134s and subsequently do not send D0139s therefore changing</p>			

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>the flow to become a DTN flow would not accomplish anything as a D0139 is sent on receipt of a D0134.</p> <p>3.1 Favoured Option: A or C</p> <p>Comment: We feel that the UMSO should have visibility of the settlement data (option A) but that the obligation should sit formally with the NHHDA to act on any discrepancies.</p> <p>Part 2 – Actions Arising Comment:</p> <p>We agree with all changes apart from the below:</p> <p>BCSP Ref – BSCP520 3.1.16</p> <p>We think the action should be to change the text to 'Issue to Customer. Issue to supplier if nominated by customer.' There would be no appointed supplier as the certificate contains a newly created MPAN and no supplier has had visibility of it until it is issued by the UMSO. If the customer has nominated a supplier the certificate should be sent to that supplier.</p> <p>Impact: Process changes.</p>			

Organisation	Agreement					Part 2 - Actions Arising (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							Other Comments: A2.1 Appointment and termination data flows in UMS Agree change. We use data derived from MPAS and do not use the flows. At present we only receive the flows from one supplier and they are not utilised.		
Lowri Beck	-	✓	✓	✓	✓	✓	2.5 Comment: All of these points would help make the UMSO D0052 processing more efficient. A2.2 Favoured Option: B Part 2 Actions Arising Comment: All seem sensible clarifications Impact: System and process changes Implementation: Changes to processes and small changes to D0052 processing needed	✓	30
ScottishPower	Dependent	X	✓	✓	✓	✓	1.4 Comment: It is right to provide some incentive to customers to update their inventory. This is true of when the inventory both increases and decreases. This proposal on seems to apply to where the UMSO	✓	270

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	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							<p>believes it has increased.</p> <p>While a statistically significant sample should provide some comfort in the accuracy and fairness of the imposed EAC value, more detail is required in this area before Scottish Power Ltd can agree to it.</p> <p>There is a risk that the customer rejects the new EAC value and refuses to pay the increased bill from the Supplier. This is potentially difficult legal ground if the UMISO is unable to prove beyond reasonableness that the EAC value is fair.</p> <p>While we can agree to the principle of the proposal, Scottish Power Ltd could only approve this if it was applied to all inventories that have not been updated for an unacceptable period of time and that there is some reference of liaising with the customer before applying any punitive changes.</p> <p>2.5 Comment: This proposal would require a NHHDC system change for no benefit to the agent. Indeed this proposal seems to be a 'workaround' instead of tackling the root cause of when EAC's require to</p>		

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	Part 1 – Proposals Arising (✓/X)								
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							<p>be backdated (i.e. lack of process controls in some UMSO's). The market should not advise having a separate process for managing D0052's for unmetered sites, specifically to circumvent issues with parties that do not timeously update data. Indeed it seems to be curious that we should be looking at a proposal that trusts the party who has to correct their historical data to send subsequent, accurate and valid D0052's.</p> <p>Within the present, accepted way of processing D0052's, UMSO's can already update historical data (less than 14 months old). If there is a later EAC that no longer applies, the UMSO can send a D0052 for this date with the correct value.</p> <p>The only part of the proposal that Scottish Power Ltd supports is the need to stipulate that D0052's should not be greater than 14 months old.</p> <p>A2.0 Comment: Further clarity in regards to this matter would be beneficial to the sector. However, the method used should be open to scrutiny by all UMSOs to ensure a transparent and agreed procedure.</p>		

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						<p>We would also suggest that guidance on this matter should be just that and not become mandated. Forcing a one size fits all solution would be counter-productive on UMSOs who already have robust processes in place.</p> <p>A2.2 Favoured Option: C</p> <p>Comment: Options A and B rely on the premise that as long as the Supplier updates SMRA then there is no material issue. However the Supplier only knows if the site is de-energised when it receives a D0139.</p> <p>The proposal implies that the manual process will remain between UMSO and Supplier, but not for NHHDC. Again we seem to be legislating 'workarounds' instead of tackling the root cause. There is also a question regarding the ability to audit the de-energisation process, and therefore the accuracy of Settlements if we are unable to measure each request.</p> <p>3.1 Comment: In essence we agree with the proposal. However we would be interested to know if the service is being widely used. This would possibly shape our</p>			

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						<p>favoured option.</p> <p>Favoured Option: A</p> <p>Comment: Option seems the best solution. However if the service is being widely used there may be a case for inclusion within the NHHDA system. We would not support an annual mandatory obligation. We would also like to understand if NHHDA's would be able to charge for the process.</p> <p>Part 2 – Actions Arising Comment:</p> <p>We agree with most of the changes. However we have concern over one which we feel should not be changed. These are listed below.</p> <p>BSCP520 3.5.10 –</p> <p>We believe that we should not deviate from the process as defined in BSCP504 where the New NHHDC requests this information from the Old NNHDC. Creating two different processes to perform the same task will lead to future confusion and error.</p> <p>Impact: Systems and processes will be impacted within our organisation. The level of change</p>			

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	1.4	2.5	A2.0	A2.2	3.1				
						<p>will be directly related to the options which are progressed. However these changes will be significant enough to warrant out stated days below.</p> <p>Other Comments:</p> <p>A2.1 Appointment and termination data flows in UMS</p> <p>We agree with this change as it will mirror what is actually happening in the field.</p>			
IMServ Europe	-	X	-	-	✓	-	✓	180	

Organisation	Agreement					Part 2 - Actions Arising (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							<p>so this is creating a mismatch within the industry,</p> <p>The only part we agree with is "That D0052s that are backdated over 14 months should be amended by the UMISO to the earliest 'effective date' for which an RF Settlement Run has not taken place.", as long as this is the latest EFD on the MPAN.</p> <p>To process flows in this way would require large changes to the NHHDC system or impose workaround solution which would increase the cost to serve un-metered supply sites.</p> <p>I think that solution 2 is more cost efficient and gets to the heart of the issue much quicker and NHHDCs and UMISOs can take direct action to correct any issues identified.</p> <p>A2.0 Comment: No real impact on NHHDC agent. We will process whatever D0052 we receive and with the EAC values contained within the flow.</p> <p>A2.2. Comment: Option 1 –No - Not the greatest of solutions as the new business process gives rise to</p>		

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	1.4	2.5	A2.0	A2.2	3.1				
						<p>generating exceptions which are then measured at market level and would distort market issues. Standard business processes should not give rise to exceptions downstream which are just ignored. This is bad business process design and should not be endorsed officially.</p> <p>Option 2 – Yes – This is the correct solution to do this properly, but we accept that it will cost money and there may not be the business case to progress this for a small issue. Can a business case be created on the basis of the level of the exceptions and the cost to settlement?</p> <p>Option 3 – No – This would be OK if the EAC EFD was updated (but the values not) to match the energisation or de-energisation date.</p> <p>Option 4 – NO – easiest solution but doesn't actually solve anything and the issue will still exist.</p> <p>Overall option 2 is the best but would need a good business case to justify the changes and cost.</p> <p>Favoured Option: B</p>			

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	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							<p>Comment: Actually fixing the issues rather than tinkering around the edges</p> <p>3.1 Comment: All options are OK. Option 4 is the most robust to ensure it happens. Building the script into DA is obviously best but will cost more. What is the business case?</p> <p>Solution 2 is probably the most efficient.</p> <p>Would increase work for NHHDA agents.</p> <p>Favoured Option: C</p> <p>Comment: Only real way to ensure compliance and the issue to be taken seriously by all parties</p> <p>Part 2 Actions Arising Comment: No comments or issues</p> <p>Implementation: All industry change should have a six month lead time if it involves system and process changes.</p>		
RWE npower	X	✓	✓	✓	✓	✓	<p>1.4 Comment:</p> <p>Npower feel there may need to be a modification raised to support this</p>	✓	?

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>point. In addition we raise the following questions that would need to be resolved before we support this:</p> <ul style="list-style-type: none"> • What method will this calculation use? • The aim of this is to improve inventory to increase settlement accuracy, but arbitrary increases could reduce this. Does it achieve the stated aim? • What happens if the customer does not provide the required inventory? <p>If this is not legally included in the Inventory/Connection arrangement between Distribution and Customer, Supplier could end up facing the added cost of this.</p> <p>A2.2. Favoured Option: C</p> <p>Comment: This will require a minor change to validation of the D0139 in NHHDC (and hence a DTC change), as the D0139 would currently be rejected from any source other than MOA. We would also want to see the validation of the D0134 changed in a similar</p>			

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>fashion for completeness</p> <p>3.1 Favoured Option: B</p> <p>Comment: This report could provide useful information to Supplier, and we would want to see it expanded so that Supplier could request this in addition to the UMSO.</p> <p>Impact: Potential impact to NHHDC system and process, NHHDA system, NHHMO process and Supplier process and system</p> <p>Implementation: Uncertain without full visibility of revised red-line document.</p>			
Scottish and Southern Energy	X	✓	-	✓	X	<p>1.4 Comment: This would falsify data going into the settlements by giving inaccurate EACs</p> <p>A2.0 Comment: Agree in principle but we would like to see the wordings before confirming acceptance.</p> <p>A2.2 Favoured Option: A</p> <p>3.1 Comment: We are happy with the current process</p> <p>Favoured Option: None</p> <p>Comment: Happy with the current</p>	-	30	

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						practice. Other Comment: Would have preferred separate change proposals for each of the two parts ('Audit issues' and the 'Actions arising from the Walkthrough'.)			
AccuRead Ltd	-	✓	-	✓	✓	✓ A2.2 favoured Option: A 3.1 Favoured Option: A Comment: If option 'a' indicates that the request will come in line with the ES scripts currently requested of NHHDA's from ELEXON then we this would be our preferred option.			
British Energy Power & Energy Trading Ltd	X	X	✓	✓	X	X 1.4 Comment: There is no justification for the UMSO increasing the EAC. This will only create further data inaccuracy within Settlements. The obligation is on the customer to update the UMSO and they should adhere to their connection agreement with Distribution. Further effort should be made to ensure that the inventory information is updated regularly. In our view, the UMSO should be aware when new apparatus is connected to the system and the inventory update	✓	270	

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	Part 1 – Proposals Arising (✓/X)								Part 2 - Actions Arising (✓/X)
	1.4	2.5	A2.0	A2.2	3.1				
						<p>from the customer should only be necessary where perishables have been replaced with alternatives (i.e. different bulbs).</p> <p>2.5 Comment: We are of the opinion that the obligation on the UMSO to send the D0052 should be tightened to be similar to the rules for updating D0019s. This process should then be auditable.</p> <p>A2.1 Agree Change: No</p> <p>Comment: This reference should not be removed. Suppliers can send the D0148 and D0151 to the UMSO via the DTN. What prevents the UMSO from also using the DTN? The DTN is a more robust method of communicating the relevant information, the onus should be on the UMSOs making appropriate use of the DTN and the appointment/de-appointment process should be equivalent to that of metered supplies.</p> <p>A2.2 Comment: This is consistent with our view expressed for A2.1.</p> <p>Favoured Option: C</p> <p>3.1 Comment: It is the obligation of the Supplier to ensure data accuracy. There is not a</p>			

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	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							<p>requirement for UMSO to have this information.</p> <p>Favoured Option: None</p> <p>Part 2 – Actions Arising Comment:</p> <p>BSCP520 1.2.2 – Disagree with this amendment. There is an obligation on the Supplier to provide the EAC to the NHHDC.</p> <p>BSCP520 3.7.1 – Disagree. Leave obligations as they currently are, but clarify that the UMSO can self-initiate.</p> <p>BSCP520 3.9.2.1 – Disagree. There is no justification for the removal of this section.</p> <p>BSCP520 3.11.4 – Inconsistent. This change is not consistent the suggested removal of the footnote in BSCP520 1.3.4 where sending a manual D0052 is being removed.</p> <p>BSCP504 3.2.6.3 – Disagree. Suppliers are responsible for ensuring the accuracy of data entering Settlement and the actions of their agents. The Supplier should be able to send this if required.</p> <p>Impact: Systems and processes</p>		

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	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							changes.		
E.ON UK Energy Services Limited	-	-	-	-	-	-	-	X	-
Siemens Energy Services	✓	✓	✓	✓	✓	X	<p>A2.2 Favoured Option: C</p> <p>Comment: We would support a DTC Change to allow D0139s to be sent via the DTN.</p> <p>3.1 Favoured Option: A</p> <p>Comment: We would suggest that this script is run on either a quarterly or 6 monthly basis, rather than on request.</p> <p>Part 2 – Actions Arising Comment:</p> <p>We disagree with the action for BSCP504 3.2.6.3 that this is not relevant to unmetered supplies. As a Data Collector we do receive D0052s in CoS instances for unmetered supplies.</p> <p>Impact: This would have process and possible system impacts.</p> <p>Implementation: This would depend on the option chosen for A2.2, as a DTC change may be required.</p>	✓	120
EDF Energy Networks	✓	✓	✓	✓	✓	✓	A2.2 Favoured Option: A	✓	180

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	Part 1 – Proposals Arising (✓/X)								
	1.4	2.5	A2.0	A2.2	3.1				
							<p>Comment: As the UMSO is unable to send the D0139 data flow via the DTN we are in favour of this requirement being removed from BSCP520</p> <p>3.1 Favoured Option: A</p> <p>Comment: The current process whereby ELEXON has provided the scripts to the NHHDA's has proved be very efficient and effective.</p> <p>Unfortunately, the majority of UMSO's do not necessary have the relevant NHHDA contacts to make B a viable option for us.</p> <p>We are not favour of option C as we would prefer for the script to be run periodically rather than once a year.</p> <p>Impact: Procedural changes would be required to our internal ISO 9001 documents</p>		
E.ON Energy Ltd	-	-	-	-	-	-	-	X	-

CP1233 Transfer of the Non Half Hourly Data Aggregator functional requirements from PSL140 to BSCP505 following the creation of PSL100 'Generic Non Functional Requirements For Licensed Distribution System Operators And Party Agents'

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Lowri Beck	NHHMO, NHHDC	✓
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
IMServ Europe	NHHDC, NHHDA	✓
RWE npower	Supplier, Supplier Agent	✓
Scottish and Southern Energy	Supplier, Generator. Trader, Party Agent, Distributor	✓
AccuRead Ltd	NHHDC, NHHDA, MoP	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent, Supplier	✓
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, NHHDC, HHMOA, NHHMOA	✓
Siemens Energy Services	NHHDC, HHDC, NHHDA, HHMO, NHHMO, MA	✓
E.ON Energy Ltd	Supplier	✓
CE Electric UK – NEDL & YEDL	LDSO , UMSO	-
EDF Energy Networks	LDSO, UMSO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Lowri Beck	✓	-	X	-
ScottishPower	✓	-	X	0
EDF Energy	✓	-	X	0
IMServ Europe	✓	-	X	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
RWE npower	✓	-	X	-
Scottish and Southern Energy	✓	-	X	-
AccuRead Ltd	✓	-	X	-
British Energy Power & Energy Trading Ltd	✓	-	X	-
E.ON UK Energy Services Limited	✓	Agree: Change is in line with previously agreed strategy	X	-
Siemens Energy Services	✓	Impact: Process Only Would implementation in the proposed Release have an adverse impact? No adverse impact.	-	0
E.ON Energy Ltd	✓	Agree: Change is in line with previously agreed strategy	X	-
CE Electric UK – NEDL & YEDL	-	-	X	-
EDF Energy Networks	-	-	X	-

CP1234 Movement of the functional requirements within PSL 110 to BSCP514 and BSCP550, following the creation of a generic non functional PSL (PSL100) via CP1182.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
United Utilities	HH & NHH MOP- NORW & UUNL id's	✓
Western Power Distribution	Distribution/Meter Operator	✓
Lowri Beck	NHHMO, NHHDC	✓
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
IMServ Europe	NHHDC, NHHDA, MOA	✓
RWE npower	Supplier, Supplier Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent, Supplier	✓
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, NHHDC, HHMOA, NHHMOA	✓
EDF Energy Networks	LDSO, UMSO	✓
E.ON Energy Ltd	Supplier	✓
CE Electric UK – NEDL & YEDL	LDSO , UMSO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities	✓	Would implementation in the proposed Release have an adverse impact? (please state impact)? No Other Comments: Change will have the benefit that all relevant details are available in one document.	X	0
Western Power Distribution	✓	Impact: Documentation change only	X	30

Lowri Beck	✓	Impact: Mainly Documentation changes Would implementation in the proposed Release have an adverse impact? (please state impact)? No	✓	30
ScottishPower	✓	Impact: Documentation Change only	X	0
EDF Energy	✓	-	X	0
IMServ Europe	✓	Agree: In general agreement with the principles of the change while judgement is reserved in terms of the perceived interpretation of the wording employed. Impact: No impact is expected as no net change is deemed to have been proposed. Implementation: No impact is expected on internal processes or procedures Would implementation in the proposed Release have an adverse impact? None expected	X	0
RWE npower	✓	-	X	-
Scottish and Southern Energy	✓	-	X	-
British Energy Power & Energy Trading Ltd	✓	-	✓	0
E.ON UK Energy Services Limited	✓	Agree: Change is in line with previously agreed strategy	X	-
EDF Energy Networks	✓	-	X	-
E.ON Energy Ltd	✓	Agree: Change is in line with previously agreed strategy	X	-
CE Electric UK – NEDL & YEDL	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	BSCP514 Page 17 2.3.2.e	Make footnote ref "71" superscript.
2	Western Power Distribution	BSCP514 Page 18 2.4.1.d	This is not an MOA obligation. Delete.
3	Western Power Distribution	BSCP514 Page 89 & page 94	It would be better if Footnote 76 was linked to sections 7.1.18 and 7.2.18 rather than 7.1.12 and 7.2.12

CP1235 Movement of Functional Requirements in PSL150 ('Half Hourly Data Aggregation') to BSCP503 following the creation of PSL100 for generic non functional requirements.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Lowri Beck	NHHMO, NHHDC	✓
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
IMServ Europe	NHHDC, NHHDA, MOA, HHDA	✓
RWE npower	Supplier, Supplier Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
British Energy Power & Energy Trading Ltd	Trader, Party Agent, Supplier	✓
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, NHHDC, HHMOA, NHHMOA	✓
E.ON Energy Ltd	Supplier	✓
CE Electric UK – NEDL & YEDL	LDSO , UMSO	-
EDF Energy Networks	LDSO, UMSO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Lowri Beck	✓	-	X	-
ScottishPower	✓	-	X	0
EDF Energy	✓	-	X	0
IMServ Europe	✓	Impact: On the basis that the changes to BSCP503 are to incorporate HHDA specific requirements from PSL150 and will therefore result in no changes to the DA requirements there will be no impact to IMServ systems and processes.	-	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
RWE npower	✓	-	X	-
Scottish and Southern Energy	✓	-	X	-
British Energy Power & Energy Trading Ltd	✓	-	X	-
E.ON UK Energy Services Limited	✓	Agree: Change is in line with previously agreed strategy	X	-
E.ON Energy Ltd	✓	Agree: Change is in line with previously agreed strategy	X	-
CE Electric UK – NEDL & YEDL	-	-	X	-
EDF Energy Networks	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower	PSL150 1.1.4.5	Attachment C 'Requirement Mapping' document maps this clause to PSL100 section 7. Sections 1.1.4.1-1.1.4.4 map directly to sections 7.1.1-7.1.4, but 1.1.4.5 appears to have been omitted from PSL100.

CP1236 Clarification of De-Energised and Disconnection Processes - Obligations under BSCP515

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
United Utilities	HH & NHH MOP- NORW & UUNL id's	✓
Central Networks East plc and Central Networks West plc	Distributor (LDSO)	✓
Western Power Distribution	Distributor , Meter Operator	✓
CE Electric UK – NEDL & YEDL	LDSO , UMSO	✓
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, Meter Operator	✓
Scottish and Southern Energy	Supplier, Generator. Trader, Party Agent, Distributor	✓
EDF Energy Networks	LDSO , UMSO	✓
E.ON Energy Ltd	Supplier	✓
RWE npower	Supplier, Supplier Agent, NHHMOP	X
British Energy Power & Energy Trading Ltd	Trader, Party Agent, Supplier	X
Lowri Beck	NHHMO, NHHDC	-
EDF Energy	Supplier, NHH Agent and HH MOP	-
E.ON UK Energy Services Limited	NHHDC, HHDC, NHHDA, NHHDC, HHMOA, NHHMOA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities	✓	-	X	-
Central Networks East plc and Central Networks West plc	✓	<p>Agree: Central Networks are supportive of this CP</p> <p>Impact: Documentation clarification only no change required to systems or business processes.</p> <p>Implementation: See above documentation clarification only</p> <p>Would implementation in the proposed Release have an adverse impact? (please state impact)? No</p>	X	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	<p>Agree: We already treat the suggested date in the request as an aspiration rather than a firm obligation so this change will not affect our current practice. If this is being treated differently during audits then we agree that changing the BSCP is sensible.</p> <p>Implementation: Minor documentation change</p> <p>Would implementation in the proposed Release have an adverse impact? (please state impact)? No</p>	X	30
CE Electric UK – NEDL & YEDL	✓	-	X	0
ScottishPower	✓	<p>Impact: Documentation processes impacted.</p> <p>Would implementation in the proposed Release have an adverse impact? (please state impact)?</p> <p>We agree to the suggested implementation date of November 2008.</p>	✓	0
Scottish and Southern Energy	✓	-	X	-
EDF Energy Networks	✓	<p>Impact: Process Change</p> <p>Implementation: Procedural changes would be required to our internal ISO 9001 documentation -</p>	✓	180
E.ON Energy Ltd	✓	-	X	-
RWE npower	X	<p>Disagree: While we support clarification of aspects of the BSCPs, npower do not feel that this change necessarily provides sufficient improvement on the original text.</p> <p>Impact: System and process</p> <p>Implementation: Details of issue expanded on below in point</p>	X	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		4		
British Energy Power & Energy Trading Ltd	X	Disagree: We cannot agree to this CP as there is no assurance that Distribution will action the energisation request within a reasonable time. We would ideally like to see the creation of a SLA outlining that Distribution should confirm receipt of the energisation request and to provide a realistic date when the work will be carried out.	-	-
Lowri Beck	-	-	X	-
EDF Energy	-	-	X	0
E.ON UK Energy Services Limited	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	RWE npower	CP1236 Title	It is noted that the title of the CP refers to Disconnection, however the sections of BSCP515 indicated in the redlined text apply to energisation and de-energisation only. Disconnection is section 3.7 and is out of scope therefore we feel the title should be "Clarification of Energisation and De-energisation Processes – Obligations under BSCP515"
2	RWE npower	CP1236 Appendix 1 Pg 1 and 2	Npower feel that the revised wording is insufficient to avoid ambiguity, especially as regards to whether the LDSO needs to adhere to the date requested, or agreed to, which may impact standards of service.

3	RWE npower	BSCP515 3.5.2 and 3.5.5; 3.6.2 and 3.6.9	Discrepancy exists in BSCP515 regarding the 10 WD obligation on MOP, and 5 WD obligation on LDSO carrying out similar work. This CP does not seek to address this issue.
4	RWE npower	CP1236 Appendix 1 Pg 1	The footnote (marked 1 in the red lined text, 12 in the original BSCP) indicates that where no reading is available, the MOP should send a D0002 to the NHHDC. MOP can currently process the D0139 without this step, as it is understood that the NHHDC deems a read should none be forthcoming. Therefore, where a system/process already exists it would be unnecessary to amend or duplicate this. We question therefore if this footnote is necessary, and could be removed. In addition, any attempt to mandate using the D0002 would require system changes.