

CPC00631 – Impact Assessment Responses for DCP0030, CP1232, CP1237, CP1238, CP1239, CP1240, CP1241, CP1242, CP1243 and CP1244.

DCP0030 - Improving Microgeneration Processes in the Code Subsidiary Documents.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier , Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA , LDSO	✓
Western Power Distribution	Distributor , MOA	✓
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	X
United Utilities	NHHMOA and HHMOA	X
Scottish and Southern Energy	Supplier , Generator, Trader, Party Agent, Distributor, MO , LDSO	X
EDF Energy	Supplier , NHH Agent and HH MOP	X
British Energy	Supplier, CVA MOA, Trader, Generator	X
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	X
npower	Supplier and Supplier Agents	X
IMServ	MOP, HHDC	-
Electricity North West Ltd	LDSO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
TMA Data Management Ltd	✓	Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform	X	-

		<p>the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: D0002 is the most appropriate choice for the MOP to respond to the Supplier's D0001 and close off the request Metering System investigation.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: Considering the lead time necessary to organise a meter change if it is required, 10 WD is too long. 5 WD would be more appropriate.</p>		
ScottishPower	✓	<p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: The D0005 is, in our opinion, the better flow to use. The D0001 is particular to suspected faults, discrepancies, comms faults etc.</p> <p>The misuse of this flow in the past has caused problems in the HH market where DC's sent D0001s to MOs to ask general questions like "when will communications be installed". This misuse tends to skew reporting and could impact performance reporting. Therefore we would not be in favour of using this flow for the purpose described in the DCP</p>	✓	180

		<p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: As the LDSO will be able to find out the required information from ECOES we feel that 10WD would be excessive and would lead to delays in the progress of such an issue. In terms of the other relevant BSCPs the time to send both the D0001 and D0005 varies between 2 and 3 WD where a timeframe is specified. As the new obligation may require further work from the LDSO a maximum 5WD turn-around would seem appropriate.</p> <p>Impact: There is a possibility of changes to both systems and processes.</p>		
Western Power Distribution	✓	<p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: If the D0002 can be used to convey the information needed then this would be our preference as it avoids the need to make a DTC change</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: 10 working days as a limit seems sensible. We would normally expect it to be quicker but the process deadlines need to allow for peaks of work and problems with particular sites that may take a few days to resolve.</p>	✓	180

		<p>Impact: LDSO System changes will be needed to generate the D0001 and we will need to link export sites to the import MPAN rather than just keeping these in a separate database. We will also need to review and change our policy documents.</p> <p>Implementation: Six months notice needed so we can schedule the I.T work</p>		
E.ON UK Energy Services Limited	✓	<p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: We believe that the D0002 is the appropriate flow as it will require minimal amendments to our systems</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: We believe that the time scales are sufficient whilst not being excessive</p>	-	-
E.ON UK (SVA)	✓	<p>Agree: This change will facilitate Suppliers in fulfilling their obligation under the BSC to ensure that there is appropriate metering on site for microgeneration customers; in addition it is a rational approach to ensuring that settlement is not adversely affected and that DNS are able to recover the correct level of DUOS</p> <p>Some concerns were highlighted during impact assessment regarding the robustness of the obligation upon the installing party to notify the LDSO.</p> <p>Question 1: Stage (c) of the process: Is there a better</p>	✓	6 Months

		<p>alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: D0002 is the preferable flow</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: The timescales for each stage of the process appear ample; we do not consider them to be too long given the length of the overall process</p> <p>Impact: Business processes and IS systems</p>		
CE Electric UK NEDL – YEDL	X	<p>Disagree: CE reject this proposal on the basis that we are generally notified by the supplier that microgeneration is installed. Therefore we feel the onus can not be on the LDSO to notify the Supplier to correspond with the Meter Operator to validate the sites generation capabilities as currently we are notified by the supplier.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: CE have no suggested alternatives at this time.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has</p>	✓	-

		<p>been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: If implemented CE agree with the timescales provided.</p> <p>Impact: Process change required</p>		
United Utilities	X	<p>Disagree: I have two principal issues with this DCP:</p> <p>1) Where older meters are concerned, the meter operator will frequently be unable to determine whether the meter has backstops or not. This is not recorded on our systems and knowledge of the meter type offers no information or guarantee of the meter's status.</p> <p>2) The DCP states that a new meter will have to comply with CoP9. This means it (or they – we'd probably use two meters) will have to provide both import and export functions for the site. This is the exact opposite of what Suppliers are currently asking us to fit. They want backstops but don't want import and export metering.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: The D0002 would allow the MOA to provide an adequate response to inform the Import Supplier the results of the investigation. If required, additional information and request for a decision on further action can be provided by the MOA to the Supplier (using Data Item J0012). A further SVCC maybe required to advise if the meter has a backstop or not.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has</p>	✓	180

		<p>been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: 10 Working Days are appropriate.</p> <p>Impact: Business processes will need to be modified and staff training required</p>		
Scottish and Southern Energy	X	<p>Disagree: We can not see the point of change for change sake; the D0002 is the correct response to an inbound D0001. However, we also don't see the point of the Supplier sending a D0001 to the MOp to investigate the metering on site and then the MOp subsequently visiting and then sending a D0002 either confirming ok or not and then in the event not ok, the supplier sending a request (D0142) to change metering to Backstop/Import/Export.</p> <p>It would be more sensible for the supplier to initially request the change of metering (D0142) to facilitate Import/Export and the MOp responding by either confirming current metering compatible or visiting to change the meter. This would then reduce the time taken to resolve the issue.</p> <p>Impact: Process Change</p> <p>Other Comments: We believe that our alternate solution is better.</p>	✓	3 months
EDF Energy	X	<p>Disagree: This new process assumes that Import Supplier is also to be responsible for Export at this site. This is not necessarily true and as such Import Supplier should not be responsible for any issues surrounding export metering at that premise.</p> <p>Also if export is to be settled then surely P81 processes need to be followed by Supplier that is charged by customer to manage their export requirements and to ensure that metering fitted to manage export are compliant. If that Supplier happens to also manage import side and wish to fit a single meter that can deal with both import and export then they</p>	✓	18 Months

		<p>would do so just by using meter exchange process already in place.</p> <p>We cannot see any need for this new process as all it is doing is making processes surrounding export more complicated and is unlikely to lead to any increase in export sites being settled.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: We believe this new process is unnecessary as it assumes import Supplier is interested in export. Process should be for a Supplier to request an MPAN and identify it is for export and then LDSO sends MPAN to that Supplier who might not be import Supplier. They can then follow existing processes for ensuring a compliant meter is fitted. This could include fitting a meter that will accurately record both import and export but only if export and import Supplier are one and the same. If not they should request an export only meter is fitted and ensure that installation does not cause problems for import supplier.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e. 10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: See above.</p> <p>Impact: System and process changes will be required to ensure this new process is followed, although if we are import supplier and have no interest in export side we do not see how this can be easily built into our systems.</p>		
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British Energy	X	<p>Disagree: We support the Panel in their decision to see if improvements can be made to the current microgeneration Settlement processes in the CSDs. However, we do not believe that this DCP sufficiently addresses the issue. We are of the opinion that this DCP will lead to inaccuracy of Settlements and will discourage competition.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: Distribution should be informing the Import Supplier as soon as they become aware of microgeneration capability at a site and before a new MPAN is created. Stage c of the process as described above is after the event.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: These timescales are too long. 10 working days for each individual stage of the process could lead to 3 months of Settlement inaccuracies.</p>	-	-
Siemens Energy Services	X	<p>Disagree: Code of Practice 9 only applies if there is a single Meter Operator involved on the site. By inference this means that both import and export suppliers are the same, although there is nothing to stop a Supplier working with Two or more Meter Operators. From the information in the DCP, we are not sure where the installation of an export meter fits into this proposal and who pays for the meter or the site visits. Is the cost of the site visits covered by the import or export supplier?</p>	✓	90-120

		<p>In practice it is the Supplier who knows of the Generators installation before the LDSO, where as the proposal assumes the LDSO is the first in the loop. There may be a case for suggesting that there needs to be a data flow from Supplier to LDSO and Meter Operator to start the checking process.</p> <p>Having discussed this DCP with our largest Metering Equipment Provider, they have expressed a preference for the two meter approach and adopting two MPANS to cover import/export situations. The use of two meters offers greater flexibility for asset utilisation and does not require the purchase and stocking of new combined functionality meters.</p> <p>The installer of a microgeneration system has no incentive to make its presence known to a Supplier, unless the customer seeks payment for exported energy. The proposed changes are unlikely to increase the number of microgeneration systems that are registered.</p> <p>There needs to be more clarity within the whole issue of registering and dealing with Import/Export installations before we can support the proposal.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: The D2 option is thought to be sufficient.</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: 10 working days between stages gives a 40 day process. This appears excessive, but as an MO we are not</p>		
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		<p>impacted directly. It gives us a bit more flexibility to schedule jobs and de-program without picking up the risks of reverse running meters and reduced import energy bills. Two programmed site visits to carry out a meter change is an expensive way to conduct business, and Suppliers may not wish to pick up this cost.</p> <p>Impact: Potentially system & process changes</p> <p>Implementation: Timescales would depend on whether an MRA change is also required for changes to Data flows.</p> <p>Other Comments: An alternative option would be to ensure that the MO always installs a meter with a backstop when they install the export meter.</p>		
Npower	X	<p>Disagree: Npower approve of this change in principle, but not the proposed methodology.</p> <p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: Npower oppose the use of an amended D0005 as there would be significant system changes required as a result of this. In addition, as the initial visit would be triggered by receipt at MOP of a D0001 it would be consistent with existing processes to respond via a D0002. Npower would not look to change this as it is presently a compliance requirement. The changes to the DTC to allow MOP to send a D0005 to Supplier would also be a hindrance to our accepting this.</p> <p>There is one major advantage, however, in Supplier reporting to MOP via the D0005, as this would remove any implication that there is a metering fault.</p>	✓	Varies

		<p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: The overall length of the process is a concern, with two visits generating a potential 50 working day process length. Simplification of the process, combining the MOP visits for example and shortening the required timescales would lead to a shorter end-to-end process.</p> <p>It should be kept in mind that there will need to be a visit arranged to the site, and in residential cases especially, one visit would reduce the impact on the customer.</p> <p>While 5 WD may be more suitable for a MOP to respond to the D0001, npower would want to maintain the current industry standard of 10 wd for the response to a D0142.</p> <p>In addition the timescale for LDSO initial notification is currently 10wd; it would not be unreasonable to reduce this to 5wd. With this, and by eliminating the D0001/D0002 investigatory step this would reduce the process down to 20 working days – 5 working days for LDSO to contact Supplier, 5 working days for Supplier to contact MOP and 10 working days for MOP to respond.</p> <p>Impacts: Both process and system changes</p> <p>Implementation: This would vary depending on the final form of implementation.</p> <p>Other Comments: Npower would prefer to send a D0142 to configure metering with a backstop where needed in place of the currently proposed process which involves a D0001/D0002 then a subsequent D0142.</p> <p>We also note that there could be a technical requirement involved with this change, which could be more suited to inclusion in the Code of Practice. This may remove the requirement for the D0001/D0002 exchange in this process.</p>		
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IMServ	-	-	-	-
Electricity North West Ltd	-	<p>Question 1: Stage (c) of the process: Is there a better alternative to the Meter Operator using a D0002 flow to inform the Import Supplier the results of the investigation? It was suggested that an amended D0005 'Instruction on Action' flow could be used instead. It is noted that if the D0005 were to be used, then the flow itself would need to be updated to allow Meter Operators to send D0005's to Suppliers. This means that a parallel change would be needed under the MRA.</p> <p>Answer 1: N/A</p> <p>Question 2: Are the suggested timescales for each individual stage of the process (i.e.10 Working Days) appropriate? It has been suggested that these could be considered too long, given the length of the overall process.</p> <p>Answer 2: We feel that the proposed timescales are reasonable</p> <p>Impact: Process change. Possible System change if parallel changes to the DTC are raised as suggested below</p> <p>Implementation: This is the minimum period we would require after the acceptance of DTC CHANGES</p> <p>Other Comments: In DCP0030 attachment B 6.3.6.5 the D0150 notification of a new meter installation should also be sent to the LDSO and DC</p> <p>A new site visit check code for microgeneration would also need to be created. Therefore a parallel change to the DTC would be needed.</p> <p>This change proposal correctly addresses the requirements for Suppliers to be notified of micro generation connecting in parallel with DNO's distribution networks, and for Metering Systems to be stopped from going backwards due to the installation of micro generation. However, this change proposal does not address how export units (kWh) associated</p>	✓	At least 180

		with micro generation will be measured and entered into the Settlements system, and therefore how the issue of and impacts of spillage will be resolved.		
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1232 - Clarification of Technical Requirements for CoP2

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
United Utilities	NHHMOA and HHMOA	✓
IMServ	MOP , HHDC	✓
Scottish Power	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
British Energy	Supplier, CVA MOA, Trader, Generator	✓
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
TMA Data Management Ltd	HHDC, HHDA and NHHDA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities	✓	Impact: Business process modifications and staff training required	✓	180
IMServ	✓	Agree: It appears to be a simple solution to this issue. Impact: Minor change to procedures for designing new metering systems. Would implementation in the proposed Release have an adverse impact? No	✓	7
ScottishPower	✓	Agree: It would seem a sensible approach, as no suitable equipment is currently available. However, we would like to see a review of the situation at some point in the future when there may indeed be suitable equipment available on the market and thus the change would no longer be necessary. Impact: Process Changes Would implementation in the proposed Release have an adverse impact? No	✓	90
Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	-	X	0
British Energy	✓	Agree: While the proposed change is noted and agreed, British Energy note that it will only help CoP 2 outstations with single circuits and does not constitute a long-term resolution. This will only be achieved when manufacturers	X	-

		are able to offer outstations which are fully compliant with the new CoP 1 & 2 requirements for auxiliary terminals. Assuming it could be around 18 months before any compliant products are developed and approved, is there any justified need to consider a corresponding change to CoP 1?Co		
Siemens Energy Services	✓	-	X	-
Npower	✓	Agree: Npower Support this change.	-	-
E.ON UK (SVA)	✓	Would implementation in the proposed Release have an adverse impact? No	X	6 Months
CE Electric UK NEDL – YEDL	-	-	-	-
TMA Data Management Ltd	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	British Energy	BSCP601 Test 049	Test 049: British Energy suggests that the revised text should cover CoP 1 requirements first.
2	British Energy	BSCP601 Test 050	Test 050: The requirement for this proposed change is not understood. Opening Page 41 of BSCP601 V9.0 dated 28/02/08 on the Elexon website (http://www.elexon.co.uk/documents/BSC_and_Related_Documents/BSC_-_BSCPs/BSCP601_v9.0.pdf) shows only a single entry for Test 050.

1237 - Movement of functional requirements in PSL160 to BSCP501 following the creation of generic non-functional PSL100

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
British Energy	Supplier, CVA MOA, Trader, Generator	✓
Western Power Distribution	Distributor, MOA	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	-
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
TMA Data Management Ltd	✓	-	X	-
ScottishPower	✓	Impact: Documentation Changes only	X	0

Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	-	X	0
British Energy	✓	-	X	0
Western Power Distribution	✓	Implementation: No notice required	X	0
Npower	✓	Agree: Npower Support this change.	X	-
E.ON UK (SVA)	✓	Agree: We have no issues with moving the functional requirements in PSL160 to BSCP501	X	6 Months
CE Electric UK NEDL – YEDL	-	-	-	-
Siemens Energy Services	-	-	X	-
E.ON UK Energy Services Limited	-	Neutral: The proposed change will have no direct impact on our activities	X	-

1238 - Requirement to mandate compliance testing for Meters and Outstations

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA , LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO , MOA	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
IMServ	MOP, HHDC	-
British Energy	Supplier, CVA MOA, Trader, Generator	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
TMA Data Management Ltd	✓	-	X	-
ScottishPower	✓	Agree: We would support such a change on the grounds that it would be an improvement on the current situation and apply a more rigorous compliance criteria. Impact: Process	✓	90

Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	-	X	0
Siemens Energy Services	✓	Impact: Process Impact Would implementation in the proposed Release have an adverse impact? No adverse impact	✓	30
Npower	✓	Agree: Npower Support this change.	X	-
E.ON UK (SVA)	✓	Agree: This change will remove ambiguity relating to the compliance of Meters and Outstations	X	6 Months
CE Electric UK NEDL – YEDL	-	-	-	-
IMServ	-	Neutral: Would be better to put obligation in BSC rather than CoPs. Other Comments: I agree that an obligation of this type is the best way to remove any confusion that may exist regarding compliance with the CoPs. However in my opinion the CoPs are not the best place for this. In my opinion this obligation would more meaningful if it was put into paragraph 3.2.1 of section L of the BSC:- “All Metering Equipment installed must comply with or exceed the requirements referred to or set out in any relevant Code of Practice (or where no Code of Practice applies, comply with Schedule 7 of the Act), or shall be the subject of and comply with a Metering Dispensation in accordance with paragraph 3.4. This compliance must be demonstrated by successfully completing the process defined in BSCP601. ”	X	0
British Energy	-	Neutral: Due to some reservations, British Energy is neutral on this change proposal. These reservations include :	X	-

		<p>a. Although the requirement for BSCP601 Meter Protocol Approval and Compliance Testing certificates has not been mandatory to-date, British Energy believes the post-Neta market has operated quite successfully without this becoming a significant issue. British Energy is therefore concerned CP1238 is seeking to fix a largely non-existent problem.</p> <p>b. Under current arrangements Meter Operator Agents and Registrants have the option of either taking the BSCP601 Meter Protocol Approval and Compliance Testing route or of relying on specifying and receiving Code-compliant equipment from manufacturers. The latter may carry a small element of risk, but the dispensation process offers a fall-back.</p> <p>c. British Energy recognises there may be a small minority of cases where non-compliant metering systems are knowingly installed in order to save money and/or time. While this practice is deplored and should be discouraged, British Energy does not believe the inclusion of the additional text proposed under CP1238 will prevent such practice in the future. However it will remove an element of choice from the compliant majority.</p> <p>d. In the short term there may be few if any CoP1/2/3/5/6 products with BSCP601 Meter Protocol Approval and Compliance Testing certificates on the day the CP1238 updated CoPs are released. Like the recent CoP1 & 2 requirement for auxiliary terminals, this may lead to numerous non-compliances and the need for dispensations until manufacturers and other relevant parties implement changes to meet the proposed requirements.</p>		
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Comments on redline text

No.	Organisation	Section	Comment
1	IMServ	COPs Section 1 Paragraph 5	Suggest moving to paragraph 3.2.1 of section L of BSC.

1239 - Registration of Non-Standard BM Units

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
CE Electric UK NEDL – YEDL	LDSO & UMSO	✓
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, Generator , HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
npower	Generation , Supplier and Supplier Agents	X
British Energy	Supplier, CVA MOA, Trader, Generator	-
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	-
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electric UK NEDL – YEDL	✓	Agree: Beneficial change as adds clarification to process	X	-
TMA Data Management Ltd	✓	Agree: Agree to the change but would like to see clearly set timescales (please see other comments). Other Comments: It would be better to clearly set minimum timescales to notify the BSC of a non-standard BMU registration rather than stipulate it must be more than 30	X	-

		working days. Elexon from past registration processes should be able to estimate the extra number of days required for the review of non standard BMU		
ScottishPower	✓	Impact: Manual Process Change Would implementation in the proposed Release have an adverse impact? no	✓	10
Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	-	X	0
Npower	X	Disagree: Npower reject this change. Impact: Processes Implementation: 3 months minimum from agreement would be required for implementation Other Comments: Many BMUs in our existing power station sites are non-standard and flexibility is required to accommodate changes in site configuration. New BMUs associated with wind farms are expected to be non-standard. The present proposal as drafted has the timescale for registering non-standard BMUs as open-ended. To accommodate planning requirements etc it is essential that the timescales are defined and quantified. Npower feel that 60 – 90 working days would be an acceptable level for this. Should this change go ahead it could delay the commercial operation of a BMU for an unknown periods of time.	✓	-
British Energy	-	-	X	-
Siemens Energy Services	-	-	X	-

E.ON UK Energy Services Limited	-	Neutral: The proposed change will have no direct impact on our activities	X	-
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Comments on redline text

No.	Organisation	Section	Comment
1	Npower	BSCP15_re dlined_v0.2 Pg1, point 1.3 and Pg2, point 1.3 continued	While it is stated that the length of time required is "more than 30WD", there is no upper limit set into this, which would compromise the ability to incorporate non-standard BMU registrations into projects
2	Npower	BSCP15_re dlined_v0.2 3.1.1, pg3	As above

1240 - Reinforcement of the legal status of the Qualification Service Provider under the BSCP537 Qualification Letter

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Scottish Power	Supplier, Distributor, Generator, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
Western Power Distribution	Distributor, MOA	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
British Energy	Supplier, CVA MOA, Trader, Generator	X
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
TMA Data Management Ltd	HHDC, HHDA and NHHDA	-
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	-
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	Impact: Documentation Changes only	X	0
Scottish and Southern Energy	✓	-	X	0

EDF Energy	✓	-	X	0
Western Power Distribution	✓	Implementation: No notice required	X	0
Npower	✓	Agree: Npower agree this change. Other Comments: Npower query if there is a requirement for some clarification wording to make it clear that an applicant may bring an action where the acts or omissions of the agent or service provider are criminal, dishonest or fraudulent.	X	-
E.ON UK (SVA)	✓	Agree: No issues have been identified with the proposed text which reinforces the existing wording within BSCP537	X	6 Months
British Energy	X	Disagree: This is an example of where a role that is tendered for has been accepted and agreed to but then the rules are being changed after the event. We are of the opinion that the current wording would suffice.	X	-
CE Electric UK NEDL – YEDL	-	-	-	-
TMA Data Management Ltd	-	Impact: Ad-hoc processes of qualification and re-qualification Would implementation in the proposed Release have an adverse impact? No	✓	0
Siemens Energy Services	-	-	X	-
E.ON UK Energy Services Limited	-	Neutral: The proposed change will have no direct impact on our activities	X	-

1241 - Clarification of Interest payments by Non-Paying BSC Debtors

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Scottish Power	Supplier, Distributor, Generator, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
npower	Supplier and Supplier Agents	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
TMA Data Management Ltd	HHDC, HHDA and NHHDA	-
British Energy	Supplier, CVA MOA, Trader, Generator	-
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA	-
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	Agree: Change seems to be a sensible way to clarify the post P214 position for Parties. No change to the current position, just a clarification of that position.	X	0
Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	-	X	0

Npower	✓	<p>Agree: Npower approve this change – though have one query regarding the application of interest on the date of payment.</p> <p>Other Comments: Npower support the clarification of the Non-Paying BSC Debtors process.</p> <p>We do however have one comment, which that that greater clarity would be appreciated as regards the application of interest on the day of payment:</p> <p>Should a debt be outstanding, and payment received on a given date, will interest still be charged for that given day, given that the payment may only clear at an arbitrary time?</p> <p>It could potentially be punitive should interest be charged on an outstanding balance, when payment had been made.</p>	X	-
CE Electric UK NEDL – YEDL	-	-	-	-
TMA Data Management Ltd	-	-	X	-
British Energy	-	-	X	-
Siemens Energy Services	-	-	X	-
E.ON UK Energy Services Limited	-	<p>Neutral: The proposed change will have no direct impact on our activities</p>	X	-

1242 - Movement of the functional requirements within PSL180 into BSCP06.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, Generator, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
British Energy	Supplier, CVA MOA , Trader, Generator	✓
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA, CVA MO	✓
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
TMA Data Management Ltd	✓	-	X	-
ScottishPower	✓	Impact: Documentation Changes only	X	0
Scottish and Southern Energy	✓	-	X	0

EDF Energy	✓	-	X	0
British Energy	✓	Impact: Updates to existing business processes to ensure the correct CSD is referenced for CVA MOA functional requirements.	✓	30
Siemens Energy Services	✓	Impact: Process Change Would implementation in the proposed Release have an adverse impact? No adverse impact	✓	30
E.ON UK Energy Services Limited	✓	Agree: This change is in line with previously agreed strategic objectives. Impact: Internal compliance tools will require updating	✓	-
Npower	✓	Agree: Npower agree the change	X	-
E.ON UK (SVA)	✓	Agree: We have no issues with moving the functional requirements in PSL180 to BSCP06	X	6 Months
CE Electric UK NEDL – YEDL	-	-	-	-

1243 - Mandating HHDC checks on quality of Meter Technical Details

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Stark Software International Limited	HHDC	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	✓
IMServ	MOP, HHDC	✓
Scottish Power	Supplier, Distributor, Generator, HHDC , HHDA, NHHDA, NHHDC, UMSO, MO, MOA , LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier , NHH Agent and HH MOP	✓
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	✓
npower	Supplier and Supplier Agents	✓
E.ON U.K.	Supplier	✓
TMA Data Management Ltd	HHDC , HHDA and NHHDA	X
British Energy	Supplier, CVA MOA, Trader, Generator	X
BizzEnergy Ltd	Supplier	X

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Stark Software International Limited	✓	<p>Agree: We agree that this change will reduce the chance of COP3 check meters being treated as main meters.</p> <p>Impact: Additional procedure to formalise the ad-hoc process that is already in place.</p> <p>Would implementation in the proposed Release have an adverse impact? No</p>	✓	30

CE Electric UK NEDL – YEDL	✓	-	X	-
IMServ	✓	Impact: Minor potential changes to existing reporting. Would implementation in the proposed Release have an adverse impact? No	✓	90
ScottishPower	✓	Agree: We believe that this change will help resolve the issue at hand and lead to resolving any error being passed into Settlement, thus benefitting the entire industry. Though the materiality of the error may be not prove to be significant it would be to the benefit of everyone if any potential error was captured as early as possible. Impact: System and process changes	✓	180
Scottish and Southern Energy	✓	-	X	0
EDF Energy	✓	Impact: Process Would implementation in the proposed Release have an adverse impact? No	✓	30
E.ON UK Energy Services Limited	✓	Agree: Changes will give additional assurance that data is entering settlement is valid Impact: Additional reports will be required	✓	-
Npower	✓	Agree: Npower agree the change Impact: Impact of processes and systems, but in line with release date. Would implementation in the proposed Release have an adverse impact? No	✓	-
E.ON UK (SVA)	✓	Agree: The addition of the new section to the appendices of BSCP502 mandate HHDCs to conduct an assessment of their	X	6 Months

		systems each month to identify and CoP1 / CoP2 and CoP3 Metering systems where the number of Main meters and check Meters associated with the MS are not the same is a sensible inclusion as this will resolve the issue of check Meters which are incorrectly identified as Main meters and ensure the accuracy of consumption data entering Settlement.		
TMA Data Management Ltd	X	<p>Impact: System and Processes Changes</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> <p>Comments: CP1243 in the second paragraph of the Description of problem / issue section states that the issue was raised concerning the invalid population of D0268, not the incorrect processing of D0268 by HHDC agents.</p> <p>However CP1243 by selecting HHDC agents to bear the responsibility of running the scripts is not going to the source of the issue, which is the D0268 production.</p> <p>It may seem wrong to take the focus away from the accurately identified source of error and introduce a whole special process to identify, report, fix, mend and reprocess. It would surely be better for all parties for the errors to be identified and fixed at source i.e. the MOA.</p> <p>All the information required to run the scripts is provided by the D0268 flow from the MOA, therefore MOAs have all the information required to run the script.</p> <p>CP1243 also misplaces the responsibility to investigate and resolve potential issues on the HHDC. Once again, the MOA is the party agent best placed to carry out these checks and investigations. The HHDC would merely raise a query with the MOA to check their record as checking the data is not necessarily conclusive when trying to ascertain whether a meter is main/check as some multi feeder sites are specifically set up to split the load.</p> <p>The onus should be firmly placed on the MOA to run the report</p>	✓	90

		<p>monthly. As Meter Operator, they will have all the necessary information to check whether this is a genuine set up or an erroneous main/check allocation on their system. If the D0268 was originally incorrectly populated, the MOP would send a D0005 to the HHDC, along with the D0268 to inform the HHDC of the error and its correction. The HHDC could then inform the Supplier of any incorrect data that entered settlement in particular highlighting any crystallised error and take action to correct the data for settlement dates before RF reconciliation.</p> <p>If the belief is that this proposal offers the best option for resolving the errors identified it may seem that in order to encourage the reduction of errors at source, namely at MOAs, that the proposed process should include transparent reporting by HHDCs of identified errors.</p>		
British Energy	X	<p>Disagree: The D0268 is a MOP owned data item and this is where the error originates from. We are of the opinion that putting the obligation on the DC to identify these errors is not the most appropriate way to address this issue.</p> <p>We suggest that a more appropriate route would be via the TAA. We note from the SVG86 minutes, that the TAA is currently unable to receive MTDs from the MOP via the DTN. Therefore no assurance can be had that the DC and the TAA receive the same MTD information from the MOP. Ideally, the MOP should send MTDs to the DC, Supplier and the TAA at the same time via the DTN. This will then provide the TAA with MTDs for all metering systems and also enable them to carry out the checks on the quality of MTDs.</p>	X	-
BizzEnergy Ltd	X	<p>Disagree: We are concerned to note that there are a number of check meters which are being incorrectly identified as main meters and there is no effective process for identifying these errors.</p> <p>We believe that the obligation for identifying these errors rests with the HH Meter Operator. They are the responsible for populating the D0268 and given that an error could have a</p>	-	-

		<p>material effect on recorded consumption then it is not unreasonable for suppliers and their customers to expect the HH Meter Operator to take all reasonable steps to ensure that if there are any errors they are identified and rectified promptly.</p> <p>For smaller suppliers in particular then prompt rectification of material errors is important due to cash-flow constraints. We would not expect the customer to pay for consumption that they had not used. So if there are errors in the data due to incorrect population of the D0268 then it is important that these are dealt with quickly rather than left for a much later settlement run.</p> <p>The proposal appears weak in terms of prompt rectification of error. If there is an obligation on the HHDC rather than the HHMOP for identifying errors, then what are the obligations on the HHMOP in terms of investigating and rectifying problems? Similarly, what are the incentives for the HHMOP in terms of improving accuracy of the initial population of the D0268?</p> <p>The change process has identified a solution in terms of identifying these errors. It would seem more appropriate for the HHMOP to have an obligation to undertake these checks together with the error reporting to supplier and HHDC.</p>		
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1244 - Remove Authorisation Categories ZB & ZC from BSCP38 and amend BSCP537 to remove relevant references to BSCP38 and to include an amended statement on who can submit BSCP537 forms to ELEXON

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
TMA Data Management Ltd	HHDC, HHDA and NHHDA	✓
Scottish Power	Supplier, Distributor, Generator, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor, MO, LDSO	✓
EDF Energy	Supplier, NHH Agent and HH MOP	✓
British Energy	Supplier, CVA MOA, Trader, Generator	✓
E.ON UK Energy Services Limited	HH & NHH DC/DA HH & NHH MO CVA MO	✓
E.ON U.K.	Supplier	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
Siemens Energy Services	NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO, MOA, CVA MO	-
npower	Supplier and Supplier Agents	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
TMA Data Management Ltd	✓	Impact: Ad-hoc process of qualification re-qualification	✓	0
ScottishPower	✓	Impact: Documentation Changes only	X	0
Scottish and Southern Energy	✓	-	X	0

EDF Energy	✓	Impact: Process Change Would implementation in the proposed Release have an adverse impact? No	✓	30
British Energy	✓	-	X	-
E.ON UK Energy Services Limited	✓	Agree: We would in general welcome this proposed change however we would seek further clarity on the proposed delegation contained within annex 3.6Com	✓	-
E.ON UK (SVA)	✓	Agree: This change will deliver necessary clarity to the Authorisations process for SVA Party Agents	X	6 Months
CE Electric UK NEDL – YEDL	-	-	-	-
Siemens Energy Services	-	-	X	-
Npower	-	Neutral: Npower are neutral toward this change.	X	-