



## Change Proposal Circular

# CPC00681: Impact Assessment of DCP0046, CP1334 and CP1335

## Responses for DCP0046 'Unmetered Supplies: Accommodating Multi-Level Static Dimming Devices in Half-Hourly and Non-Half Hourly Settlement'



### Any Questions

If you have any queries, please contact:  
**CCC@elexon.co.uk.**

Or contact:  
**BSCP40 Change  
Process Task Leader  
020 7380 4135  
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### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
MRASCo Ltd	MRASCo	Yes	No	None
Spark Energy		Neutral	No	0
Central Networks	UMSO	Yes	Yes	180
Power Data Associates Ltd	Meter Administrator	Yes	Yes	0 – 270 days
TMA Data Management Ltd (MPID UDMS)	HHDC, HHDA, NHHDA and NHHDC	Neutral	No	0

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## Summary of Responses

Western Power Distribution	Distributor/MOA	Yes	Yes	120 or 180 days depending on which potential solution is taken forward (see Q 5 response)
EDF ENERGY NETWORKS	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI	No	Yes	150
E.ON	Supplier	Neutral	No	180
Electricity North West Limited	LDSO	Yes	Yes	180
EDF Energy	Supplier, NHH Agents, HH MOP	Neutral	No	0
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	Yes	90
British Energy	Generator, Supplier, Trader Non Physical, Party Agent (CVA MOA)	Neutral	No	0
E.ON UK Energy Services Limited	MOA & NHHDC	Neutral	No	0
British Gas	Supplier	Neutral	No	0
Scottish & Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	Yes	12 – 15 months
NPower Limited	Supplier/Supplier Agents	Yes/No/Neutral	Yes	Please see response to question 9.

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## Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
MRASCo Ltd	Yes	No	<p><b>Agree change comment</b> - The change will enable BSC Settlement arrangements to cater for calculating the energy where dimming/switching facilities for street lamps are fitted.</p> <p><b>Please explain the lead time</b> - This change does not affect the MRA product set.</p> <p><b>Associated costs?</b> None</p>
Spark Energy	Neutral	No	-
Central Networks	Yes	Yes	<p><b>Agree change comment</b> - Any initiative to accommodate energy saving in street lighting needs to be provided for within the BSC, subject to accuracy of energy consumption calculations.</p> <p><b>For which role is your organisation impacted?</b> UMSO</p> <p><b>Please state what the impact is</b> - Changes will be required to our software to accommodate any revision to the Switch Regime format.</p> <p><b>Please explain the lead time</b> - Development and Testing of our software and systems to ensure accurate EAC calculation for NHH trading and accurate summary inventory production for HH trading.</p> <p><b>Associated costs:</b> Estimated at £10000 to £20,000, detailed costing not carried out. Our EAC calculations are system based to ensure that switch regime/charge code combinations are validated. E.g. dimming equipment is correctly combined with a dimming switch regime. The validation and EAC calculations require extensive development and testing to ensure accuracy.</p> <p><b>Question 5</b> - Numeric would appear to have least impact, but either option is likely to impact significantly upon our systems. Impact included in lead time above of 180 days plus £10-£20,000 worth of costs.</p> <p><b>Question 6</b> - I think it highly unlikely that customers will be able to provide Exelon with the necessary evidence. I would have expected manufacturer test results to have been provided and to be used instead.</p> <p><b>Question 7</b> – Yes</p> <p><b>Question 8</b> - This could be a major impact. An automated process to validate combinations within an inventory is likely to be costly, and manual checking is likely to require additional expertise and resource. It suggests that a deal of thought needs to be given to the allocation of switch regimes, so that the logic within any process is relatively easy to write.</p> <p><b>Question 9</b> – N/A</p> <p><b>Question 10</b> – No. The proposed solution will cause energy consumption to be smeared across the dusk to dawn profile. Allowing use before the solution is implemented will make this even worse.</p> <p><b>Question 11</b> - As intimated in my response to Q.10, this solution will cause energy</p>

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## Detailed Impact Assessment Responses

			<p>consumption to be smeared across the dusk to dawn profile. Consideration ought to be given to either limiting the use of these devices to smaller customers where the effect on settlements will be less significant, insisting that when loads reach a threshold then a full half hourly trading arrangement must be entered into to ensure that consumption is allocated into the correct half hourly periods.</p>
Power Data Associates Ltd	Yes	Yes	<p><b>Agree change comment:</b> There seem to be products entering the market which the current BSC arrangements cannot support. These products are being adopted by customers to seek reduce their carbon impact.</p> <p><b>For which role is your organisation impacted?</b> As Meter Administrator</p> <p><b>Please state what the impact is -</b> Validation and reporting IT systems, the Equivalent Meter and associated operational procedures.</p> <p><b>Please explain the lead time -</b> It depends on where in the development cycle the decision is made, and whether the IT system has already been modified to suit the final agreed changes. Some work is already being anticipated and progressed.</p> <p><b>Associated costs:</b> Would not wish to provide any information</p> <p><b>Question 5 -</b> 3 characters is the preferred approach</p> <p><b>Question 6 -</b> As an MA I would expect this to be part of the charge code (&amp; switch regime) application process.</p> <p><b>Question 7 -</b> As an MA I believe b seems appropriate and feasible</p> <p><b>Question 8 -</b> The existing ELEXON website data of switch regime and charge codes currently contains errors and omissions such that it is simply not adequate as currently produced. ELEXON would need to strengthen their operational understanding of unmetered equipment, the current approval process is not operating adequately, this will add a further level of complexity which demands further skills within ELEXON staff.</p> <p><b>Question 9 -</b> MA only sees a summary inventory which has switch regime and charge codes. We do as much validation as we can reasonably do, but there are errors and omissions in the Elexon published data which means that we would never 'load' the current data into our systems as our systems would be corrupted resulting in errors in settlement. Current ELEXON updates are checked, manually entered (where correct) and reconciled regularly. Any validation by the MA can only be performed on valid combinations of charge and switch regime combinations. The BSCP520 currently requires the UMSO to check the data and only send valid data to the MA, so our checks should never find an error – however current experience is that some UMSO are substantially better than others.</p> <p>This issue will be the same for the UMSO who receive a valid detailed inventory and can only validate between the codes received.</p> <p><b>Question 10 –</b> Yes. Meeting the Feb 2011 release will depend upon the CP being raised and</p>

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			<p>agreed in good time, and meeting the software release timescales.</p> <p><b>Question 11</b> - This response template is rubbish.</p> <p>The DCP refers to obtaining applications from customers, the applications generally come from manufacturers of the equipment, as Appendix A correctly identifies.</p> <p>The DCP does not mention the number of light levels during a 24 hour period. To make the system development reasonable the number of changes in a 24 hour period should be limited to say, 8.</p>
TMA Data Management Ltd	Neutral	No	-
Western Power Distribution	Yes	Yes	<p><b>Agree change comment:</b> We need to respond to customers' requirements to introduce this new equipment and the proposals are a reasonable way of doing this.</p> <p><b>For which role is your organisation impacted?</b> UMSO &amp; MA</p> <p>Please state what the impact is - Changes to Meter Administrator and UMSO software and minor operational procedures.</p> <p><b>Please explain the lead time</b> - Except for very minor changes our standard requirement is a 6 month lead time for development work. However, as this is a change we believe should be implemented as soon as possible, and if question 5 option B is taken forward, we would be able to reduce the lead time to allow for a February 2011 implementation.</p> <p><b>Associated costs:</b> Depending on which the solution is taken forward we estimate a cost of between £10,000 and £20,000 which is primarily I.T. charges.</p> <p><b>Question 5</b> - a. Although both options will provide the same benefit, i.e: a wider range of available switch regimes, using a larger numeric field would require significant I.T development as the size of the field will need to be changed in a number of applications.</p> <p>b. Using an alpha-numeric 3 character field is our preference as this will have the least impact on our business. Some of our systems will already cope with an alphanumeric data item and will not need to be changed.</p> <p>If option A is taken forward we estimate our cost to implement the change would double. It will also put at risk a February 2011 implementation as the additional I.T resource needed will not be available in time to deliver the change by then. In this scenario we could not implement the change until the June 2011 release.</p> <p><b>Question 6</b> - No, we do not believe we should rely on customers own evidence.</p> <p>Acceptance should be limited to cases where either the manufacture of the equipment provides the evidence, or by reference to a combination already published on the website.</p> <p><b>Question 7</b> - We believe only option B is acceptable. Option A provides too much scope for the process to be abused, it does not offer the required protection to the integrity of settlements, and it would be likely to make inventory audits more difficult.</p>

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## Detailed Impact Assessment Responses

			<p><b>Question 8</b> – It will increase workload but not to a significant degree and we are happy with this aspect of the proposal.</p> <p><b>Question 9</b> – It will increase workload but not to a significant degree and we are happy with this aspect of the proposal.</p> <p><b>Question 10</b> – We have no problem agreeing interim solutions with customers to let them adopt the new regimes ahead of formal implementation of this change.</p> <p><b>Question 11</b> – No other comments.</p>
EDF Energy Networks	No	Yes	<p><b>Agree change comment:</b> The DCP, as currently drafted, does not seem sufficiently robust in terms of ensuring the accuracy of EAC calculation.</p> <p><b>For which role is your organisation impacted?</b> UMSO and LDSO</p> <p><b>Please state what the impact is - UMSO</b> – Will be required to carry out additional complex validation of customer inventory submissions and guide customers through the process. Software will also require significant upgrading to assist with validation, re-work file import routines, and accommodate changes to Switch Regime formats.</p> <p>LDSO – Concern in respect of a likely negative impact on Settlement accuracy. The end-to-end process does not appear robust and will likely result in less accurate consumption calculations.</p> <p><b>Please explain the lead time</b> - Specifying, designing, testing and implementing major software changes.</p> <p><b>Question 5</b> – Our software developer has indicated that retaining numeric codes but adding one or more additional characters would be far easier than accommodating the alphanumeric option.</p> <p><b>Question 6</b> – No, the ideas set out in the DCP do not seem realistic. Customers will be dependent on the manufacturers of dimming technologies who are likely to make various claims in order to win sales. Customers themselves are heavily focused on reducing energy use, energy costs and associated carbon emissions and less concerned with accurate Settlement. Meanwhile the ballasts produced by different manufacturers and intended for SON, Mercury, Cosmopolis and LED lamps which have varying characteristics are likely to demonstrate considerable divergence in how a control voltage (or digital interface) affects the power output of the ballast/lamp unit.</p> <p>This DCP seeks to move away from the full test-house procedure presumably on the grounds that the range of options of dimmer/ballast is immense. It is a proposed relaxation of rules driven by volumes and not because there is any less need for the testing. Indeed, the uncertainties are likely to be greater than with equipment operated at 100% power levels and earlier test data provided to the UMSUG group indicated this, especially with higher levels of dimming.</p> <p><b>Question 7</b> –</p>

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			<p>[a] No customer is likely to apply to Elexon in this situation. Customers are not used to interacting with Elexon in this way. Additionally, based on their inability to maintain accurate 'standard' inventories, we couldn't really expect them to maintain records of complex power/light level settings which they've altered.</p> <p>[b] This option provides the greatest reassurance to Settlement (notwithstanding other comments) and best reflects the likely capabilities of local authority customers.</p> <p><b>Question 8</b> – Our software developer has indicated that automated validation could be constructed although it will require extensive re-working of screens and processes. It will also slow down inventory processing by UMSO staff. Of greater concern is whether customers are capable of providing those elements in their inventory submissions. While some customers manage to provide Charge Codes and Switch Regimes none declare ballast type and 'valid dimming product' is obviously a new item. Their inventory systems and data collation processes will not be equipped for this.</p> <p><b>Question 9</b> – N/A</p> <p><b>Question 10</b> – As a strictly temporary solution and bearing in mind that these devices should always result in reduced energy consumption this seems pragmatic.</p> <p><b>Question 11</b> – We would also have concerns over the prescribed process by which new Switch Regimes (incorporating the EAC Reduction to derive lower Annual Hours) are applied for. We have doubts as to customer's ability to provide all of this information and the extent to which some of those aspects will be taken 'on trust'.</p> <p>In terms of the DCP more generally if no reasonable alternatives and improvements can be formulated are we required to simply tolerate higher levels of error in UMS Settlement at any cost because this 'green' and 'energy-saving' technology must not be impeded?</p>
E.ON	Neutral	No	-
Electricity North West Limited	Yes	Yes	<p><b>Agree change comment</b> - A Street Lighting Authority does need the ability to influence its carbon usage, however is the Unmetered option the best way to facilitate this type of equipment, given that the BSCP520 requires a predictable load. The other option would of course be for the load to be metered.</p> <p><b>For which role is your organisation impacted?</b> UMSO</p> <p><b>Please state what the impact is</b> - As an LDSO the UMSO will need to verify the accuracy of inventories where multi level static dimming devices have been declared. The verification will be to check the various charge and regime codes or physical inspection of the equipment via the audit process.</p> <p><b>Please explain the lead time</b> - Review and update business processes and carry out an impact on whether any system changes would be required as a result of the change.</p> <p><b>Question 5</b> – System change would be required for the summary data, lead time circa. 3 to 6</p>

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			<p>months.</p> <p><b>Question 6</b> – We feel it is feasible for customers to provide this evidence, but should also be backed up by Elexon testing, so that any incompatible lamp/ballast combinations are eliminated and not issued with charge/regime codes.</p> <p><b>Question 7</b> – We would support option b, as we don't feel any reconfiguring of products should take place.</p> <p><b>Question 8</b> – There would be a small to medium impact on the UMSO's time, but we would build this into our existing data validation process.</p> <p><b>Question 9</b> –</p> <p><b>Question 10</b> – It would seem more appropriate to wait until Feb-11 for complete implementation of the DCP.</p> <p><b>Question 11</b> – Yes:</p> <ol style="list-style-type: none"> <li>1. Does multi level static dimming fulfil the criteria for an Unmetered supply eg is the load predictable?</li> <li>2. Who will verify that the test data supplied by the manufacturer is realistic and will be repeated once installed on site?</li> <li>3. Will UMSOs / MAs have the opportunity to review test data supplied by manufacturers to Elexon?</li> <li>4. Will there be standard configurations for dimming levels, light levels (lux), times and associated power ratings?</li> </ol>
EDF Energy	Neutral	No	-
<p>Accenture on behalf of:</p> <p>ScottishPower Energy Management Ltd.</p> <p>ScottishPower Generation Ltd.</p> <p>ScottishPower Energy Retail Ltd.</p> <p>SP Manweb plc.</p> <p>SP Transmission Ltd.</p> <p>SP Distribution Ltd</p>	Yes	Yes	<p><b>Agree change comment:</b> The current arrangements within UMS do not facilitate the use of multi-stage dimming without the use of a CMS system. These new devices which are entering the market require to be accommodated and as such the solution developed by the expert group convened by Elexon are appropriate and adequately allow the introduction of such devices.</p> <p><b>For which role is your organisation impacted?</b> LDSO/UMSO</p> <p><b>Please state what the impact is -</b> There would be an impact on internal processes and on implementing a manual process, Depending on the solution there may also be a system impact to cope with 4 digit switch regimes. However if 3 digit alpha-numeric codes were to be used there would be no system impact.</p> <p><b>Question 5</b> – As an UMSO, ScottishPower's UMS system can accept with alpha-numeric. However to receive codes more than 3 digits we would need a system change to implement such a change. It would be our preference to use alpha-numeric codes rather than extend the codes to more than 3 digits. With the use of such codes there would be no need for longer</p>



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			<p>codes.</p> <p><b>Question 6</b> – The potential solutions suggested within the DCP do seem to be a logical method. Possibly the most robust approach would be to allow only approved combination backed up with testing from the manufacturers for such combinations. However we would not be against using a mixture of methods to ensure valid combinations are used.</p> <p><b>Question 7</b> – We would under no circumstances support allowing customers to have the ability to modify and set the dimming patterns of devices. At the expert group convened by Elexon this was echoed by all in attendance. From discussions with manufacturers it was clear that they can accommodate such a request and that devices sold in the British market could be factory set with the appropriate code and dimming pattern shown on the device.</p> <p><b>Question 8</b> – The introduction of such a manual process would impact on our current operation and place additional strain on resources within the UMS operations team. However, by using a centralised approach to such combinations it will assist in ensuring consistency between all UMSOs over all GSPs and as such it is ScottishPower’s opinion that this is an appropriate and necessary addition.</p> <p><b>Question 9</b> – Not Applicable</p> <p><b>Question 10</b> – It may be impractical to prevent such devices being used in the current market. However, if such a move was to be made the customer should see a clear benefit from correctly reporting these devices once the CP is implemented thus encouraging the correct reporting of the device. We are deeply concerned that if the customer can see no benefit in correctly reporting the device then the error introduced in the interim will continue and further deteriorate the accuracy of UMS. ScottishPower has mostly NHH UMS customers and this could be a significant issue for us going forward if such a situation was to arise as the most significant error will be seen in the NHH market due to its nature.</p> <p><b>Question 11</b> – No</p>
British Energy	Neutral	No	-
E.ON UK Energy Services Limited	Neutral	No	-
British Gas	Neutral	No	-
Scottish & Southern Energy	Yes	Yes	<p><b>For which role is your organisation impacted?</b> UMSO, Supplier</p> <p><b>Please state what the impact is</b> - Significant changes to the NHH and HH systems and processes.</p> <p><b>Please explain the lead time</b> - Due to the nature of the proposed change and to allow for our IT scheduling and user acceptance testing we may not be ready for February 11.</p> <p><b>Associated costs</b> - Significant costs for changes to our inventory system software.</p>

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**Question 5** – We would need to make significant changes to our inventory system software, for both options.

**Question 6** – We believe that most NHH customers will be unable to provide evidence; it may also be the case that the take-up is far smaller than expected with these customers unless proactive steps are taken by manufactures to market their product. From past experience it isn't until a customer is given the product to install and then contacts their UMSO that they find that no code has been applied for. Then we have a situation of the customer looking to install the product right away, but having to go back to either the manufacturer or supplier for the product info.

One solution would be to provide a manufacture/s product code for all approved UMS items. This would enable any customer to access the Elexon website, select a manufacturer and see what items are approved. A link could then take them to the relevant application process if the product is not approved. With education a local authority would then be able to check/confirm with the manufacturer that the item has been allocated a charge code. This may cause a problem with historical items which may have been discontinued. But would ultimately ensure customers are aware that any new product must have a valid code/regime.

**Question 7:**

- a) If a customer is aware of their new product we would be very surprised if they didn't contact their UMSO to discuss how the item should be formatted on their inventory return.
- b) How would this be enforced/mandated to ensure that either the customers carry out the labelling themselves or the manufacturer does before shipping? Otherwise neither party would have any legal/regulatory obligation.

**Question 8** – We already carry out various item checks. Business impact would depend on how user friendly and compatible the look-up tables are. Normally we will look to carry out a data clean up exercise within 1-3 hours of opening an inventory.

**Question 9** – We believe that once the required software changes are in place, the procedure for loading would not be any different from a normal inventory load.

**Question 10** – With CRC Energy efficiency Scheme taking effect from 1st April 2010 and HH customers wanting to see a visible reduction in their energy consumption, we can see no reason why a customer cannot declare under an existing switch regime. However it should be pointed out that once in place the new procedure will require them to submit their inventory with the new correct codes.

**Question 11** – For this to work effectively, we believe that education/guidance is vital. With regard to retention of Switch Regime for customer's product;

Option a: Assumes customers will know the correct procedures to follow before making changes. Potentially easier process for the customer to make changes. However the customer could make changes to the Switch Regime without informing Elexon/industry, either through

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			<p>lack of knowledge of correct processes or otherwise.</p> <p>Option b: Tighter controlled process. Potentially harder for the customer to make changes - process takes longer. Provides better security of continuity of configuration and it is more difficult for the customer to accidentally make changes. Is this process more in line with the manufacturing of meters?</p>
NPower Limited	Yes/No/Neutral	Yes	<p><b>Agree change comment</b> - We agree with this change in principle but believe there are further aspects that need investigating.</p> <p><b>For which role is your organisation impacted?</b> Supplier, HHMA</p> <p><b>Please state what the impact is</b> - System Impacts for accommodating new Time Switch Regimes.</p> <p><b>Please explain the reasons for this lead time</b> - Please see response to question 9.</p> <p><b>Associated costs</b> - Costs are unknown at this time.</p> <p><b>Question 5</b> – Changing the format for Time Pattern Regimes would have System Impacts on HHMA Systems and Processes. 6 month lead time would be required. Costs are unknown at present.</p> <p><b>Question 6</b> – Please give details: We do not envisage any problems with this scenario.</p> <p><b>Question 7</b> – We believe option A provides greater Flexibility. Option B is inflexible and would increase administration burden.</p> <p><b>Question 8</b> – We believe more consideration is required to find a suitable validation process, which all stakeholders need to be involved in.</p> <p><b>Question 9</b> – The impact of accommodating the new Switch Regimes will require redevelopment of our MA software by the software provider. This will come at a cost and is highly unlikely to be available by Feb 2011.</p> <p><b>Question 10</b> – We believe more analysis is required on the impacts of this interim solution.</p> <p><b>Question 11</b> - No</p>



### About Severity Codes

**H (High):**  
Prejudices document's conclusions, recommendations or fitness for purpose.

**M (Medium):**  
Matter of substance, but not high.

**L (Low):**  
Minor error but document's intention is clear.

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## Responses for CP1334 'New PARMS Serials'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
MRASCo Ltd	MRASCo	Yes	No	None
Spark Energy		Neutral	No	0
TMA Data Management Ltd (MPID UDMS)	HHDC, HHDA, NHHDA and NHHDC	No	Yes	120
Western Power Distribution	Distributor/MOA	Neutral	Yes	270
EDF ENERGY NETWORKS	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI	Neutral	Yes/No	0
E.ON	Supplier	Yes	Yes	180
Electricity North West Limited	LDSO	Neutral	No	0
EDF Energy	Supplier, NHH Agents, HH MOP	Neutral	Yes	365
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	Yes	270

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### Summary of Responses

British Energy	Generator, Supplier, Trader Non Physical, Party Agent (CVA MOA)	Yes	Yes	90
E.ON UK Energy Services Limited	MOA & NHHDC	Yes	Yes	180
British Gas	Supplier	Yes	Yes	1 month
IMServ	HHDC, NHHDC, MOA, NHHDA, HHDA	Yes	Yes	180
Scottish & Southern Energy	Supplier/ Generator/ Trader/ Party Agent/ Distributor	No	Yes	18 – 24 months
NPower Limited	Supplier/ Supplier Agents	No	Yes	180

### Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
MRASCo Ltd	Yes	No	<p><b>Agree change comment</b> – Better metrics to monitor Suppliers and Supplier Agents.</p> <p><b>Please explain the lead time</b> - This change does not affect the MRA product set.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs?</b> No</p>
Spark Energy	Neutral	No	-
TMA Data Management Ltd	No	Yes	<p><b>Agree change comment:</b> There is no evidence that the added complexity of the new serials will add any clarity and usefulness to the PARMS serials. The risk is that a lot of effort is spent creating the new serials but that they are as unused as their predecessors. Party agents will continue to use their own internal reporting to look for discrepancies. There is always a risk when looking at reporting that we get lost in the amount of information provided.</p> <p><b>For which role is your organisation impacted?</b> HHDC, HHDA, NHHDC and NHHDA</p> <p>Please state what the impact is - Impact on systems and procedures</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs</b> - The cost would be high as it is a radical change in the PARMS logic.</p> <p><b>Any other comments</b> - We are - opposed to CP1334, not only is the cost involved to the</p>

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			<p>Industry not justified by the benefits that the new PARMs serials might bring but there seem to be discrepancies between the standards proposed by the new PARMs serials and the timescales set out in BSCP504, 502 and 514.</p> <p>HM11 states that 100% of the D0268 should be received within 15 WD of the change to the metering details. In BSCP502 the standard is within 5 WD. It seems inconsistent and perverse to have two BSCP standards for one process</p> <p>NM11 states that 100 of the D0149/D0150 should be received within 5 WD of the change to the metering system, the standard in BSCP504 is within 10WD. It seems inconsistent and perverse to have two BSCP standards for one process</p> <p>It absolutely does not make sense to have a higher standard for NHH metering where no performance standards have to be met at SF and allow the HH metering information to be sent up to 15 WD after the metering change when 99% of the HH data must be actual by SF (15WD after the Settlement date).</p> <p>If the proposed PARMs standards were adopted by HHMOAs, it would ensure that Suppliers did not meet their settlement obligations, because their HHDC's could not.</p> <p>Considering the level of average consumption recorded by HH metering and that by NHH metering, a delay in receiving HH metering information has more impact on the quality of data entered in settlement than a delay in receiving NHH metering information, why would new standards be more stringent in the NHH market than the HH market? As well as inconsistent with the rest of the BSCPs?</p>
Western Power Distribution	Neutral	Yes	<p><b>For which role is your organisation impacted?</b> MOA</p> <p><b>Please state what the impact is</b> - Significant I.T. work to decommission existing &amp; develop new scripts.</p> <p><b>Please explain the lead time</b> - We normally require a minimum of 6 months notice for I.T changes but as these changes are quite significant and due to other changes already planned we would appreciate additional lead time.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> YES</p> <p><b>Please state impact</b> - It will be difficult to schedule I.T changes in time for the February 2011 release.</p> <p><b>Associated costs</b> - Estimate £10,000 I.T development costs</p>
EDF Energy Networks	Neutral	Yes/No	-
E.ON	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier and DC</p> <p><b>Please state what the impact is</b> - Although the change states Logica will carry out this change we will still need to allocate resource to apply software patches, PARMs serials are accessed via</p>

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			<p>internal intranet links so these will need to be amended. Due to current system enhancements we may need to made changes to both old and new systems.</p> <p><b>Please explain the lead time</b> - Minimum of 6 month notice</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> If we are given less than 6 months notice this could be problematic.</p> <p><b>Associated costs</b> - Not available at this point</p>
Electricity North West Limited	Neutral	No	-
EDF Energy	Neutral	Yes	<p><b>For which role is your organisation impacted?</b> All roles will be impacted major impact is on agents</p> <p><b>Please state what the impact is</b> - Rewrite of internal PARMS reporting suite is required to manage changes to serials.</p> <p><b>Please explain the lead time</b> - Timing is based on required work to implement this change without making short cuts and potentially getting these reports wrong, which would provide incorrect performance data to PARMS.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes – it will divert resources from other more important work, we do not see that these changes to PARMS are really urgent. We do though believe that these should be done correctly and not rushed through.</p> <p><b>Associated costs</b> - Not known</p> <p><b>Any other comments</b> - Examples in Appendix C should all be updated to show calculations that are required for first month of new PARMS serials to aid parties in getting these correct. Current details are of poor and misleading quality and these should be updated to provide a guide so that correct reporting can be built.</p>
<p>Accenture on behalf of:</p> <p>ScottishPower Energy Management Ltd.</p> <p>ScottishPower Generation Ltd.</p> <p>ScottishPower Energy Retail Ltd.</p> <p>SP Manweb plc.</p> <p>SP Transmission Ltd.</p> <p>SP Distribution Ltd</p>	Yes	Yes	<p><b>Agree change comment:</b> We agree with the changes in CP1334, however we question two points:</p> <ol style="list-style-type: none"> <li>1. Why are the timescales for NM03 &amp; NM04 being changed as part of CP1325 for the November 2010 release when these serials are to be removed in February 2010 anyway? The current timescales as per CP1248v2.0 will already have been in place for a year by that time, so it seems hard to justify the expense of changing them again under CP1325 for 3 months of reporting.</li> <li>2. While amending t-1 to t simplifies matters, will this not result in missing data at the month of implementation ie March's reporting under t-1 for certain serials would previously result in both January and February data being reported on. However, when this change is implemented in March 2011 under t, only February's data for those serials will be reported on and January's data will be omitted. How will this omission be addressed?</li> </ol>

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			<p><b>For which role is your organisation impacted?</b> MOp, NHHDC, HHDC</p> <p><b>Please state what the impact is</b> - Systems will have to be significantly changed to accommodate the new serials and remove the obsolete serials.</p> <p><b>Please explain the lead time</b> - We feel that the proposed implementation date of 1st March 2011 provides insufficient lead time given the scale of the changes required. We would instead recommend an implementation date of June 2011.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact anticipated.</p> <p><b>Any other comments</b> - We would recommend that the changes to NM03 &amp; NM04 for CP1325 be removed from the November implementation as the cost of the change is not justified given the removal of these serials 3 months later.</p>
British Energy	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> - System impact</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
E.ON UK Energy Services Limited	Yes	Yes	<p><b>For which role is your organisation impacted?</b> MOA NHHDC</p> <p><b>Please state what the impact is</b> - PARMs reporting Suite and associated procedures will need to be updated</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Assuming a relatively swift decision on this CP then the proposed date should not present an issue.</p> <p><b>Associated costs</b> - Not Available at this time</p>
British Gas	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> - Management of agent performance</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs</b> - Minimal direct costs for supplier but agents will need to make system changes to produce new reports</p>
IMServ	Yes	Yes	<p><b>For which role is your organisation impacted?</b> HHDC, NHHDC, MOA</p> <p><b>Please state what the impact is</b> - Development and implementation of a number of new PARMs serials and decommissioning of existing serials.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Potentially. Have stated the number of days lead time necessary to implement the new reports, and depending on the time taken to reach approval for the CP the time between confirmation and implementation (February 2011) could be less than the time requested.</p>

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Scottish & Southern Energy	No	Yes	<p><b>Agree change comment</b> - We believe that due to the fluidity of the Risk Based PAF, the new serials appear to be a temporary solution. The retained serials should continue as existing but other PATs should be explored to address those risks associated with the transfer of key data for the integrity of Settlements, for example, the BSC audit.</p> <p>With regards to 'helping' suppliers with agent performance;</p> <ul style="list-style-type: none"> <li>the new SP15, HM12, NM12, AND NC11 serials require the Agents to re-examine all appointments over the previous 14 months looking for missing flows. Is this really necessary because from the Settlement point of view, Suppliers should be aware of the issues? Also other PATs would also have identified these issues.</li> <li>that is more for suppliers to actively manage their agents. With the nature of the reporting timescales and time period of the PARMs serials, the Suppliers should already be aware if there is any issue with an agent 'failure' in any areas.</li> </ul> <p>This change will not address the inconsistencies in reporting levels as we understand that the final new set will still have a combination of GSP Group and National levels.</p> <p>We do not perceive any cost benefit in introducing this change. What benefits does Elexon perceive to justify this cost to Elexon and the Party Agents?</p> <p><b>For which role is your organisation impacted?</b> Supplier and Party agents</p> <p><b>Please state what the impact is</b> - Significant costs. The changes within the new serials are so fundamental that they do not appear to be just minor adjustments. But more a case of 'throwing it all away and starting again', systems we built at a considerable cost to meet the requirements for P99 only five years ago. Even those new serials based on the existing ones also involve radical changes made to our systems. This is in addition to the cost we have to incur in decommissioning the serials not required, following implementation of the CP1325.</p> <p><b>Please explain the lead time</b> - We anticipate this to be a major piece of work for which we would need to carry out detailed analysis, however, estimate that to create new ones, testing and training would be very significant. We would require at least 18-24 months after approval to implement and to meet our IT schedule. Especially as with all the industry participants, we will have a stretched resource for IT schedules whilst meeting the mandatory industry changes to the roll out of Smart Metering and AMR. This is in addition to the work we have had to incorporate for the decommissioning of the removed serials, following implementation of the CP1325.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes, we would not be compliant. This is not a fair position to put us in.</p> <p><b>Associated costs</b> - We would need to carry out a feasibility study for a detailed analysis, to fully understand the cost/implications to our systems and processes. Also See 2b.</p> <p><b>Any other comments:</b> Yes:</p> <ul style="list-style-type: none"> <li>We believe that if, after 5 years the current set is not considered suitable, then we are not convinced that the new serials will be fit for purpose in the next five considering it could take</li> </ul>
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			<p>up to two years to implement them.</p> <ul style="list-style-type: none"> <li>• Especially in view of the likely future changes in the industry with the introduction of Smart Metering and increasing volumes of AMR.</li> <li>• With this in mind, we question if this will have a real positive effect from Settlements point of view in the next few years after implementation.</li> <li>• We also have concerns over the modifications required to the PARMs systems, as history has shown this to be not a robust system especially as Elexon incurred a considerable cost following implementation of P99. We are not comfortable with the quote that has been provided which we believe is underestimated.</li> </ul>
NPower Limited	No	Yes	<p><b>Agree change comment</b> - As it is currently drafted we would not be supporting this change unless our concerns raised in question 6 can be suitably addressed.</p> <p><b>For which role is your organisation impacted?</b> Supplier and Supplier Agents</p> <p><b>Please state what the impact is</b> - System and Process Impacts</p> <p><b>Please explain the lead time</b> - Providing the issues listed in question 6 have been sufficiently addressed</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> As per response to question 3</p> <p><b>Associated costs</b> - Costs not yet known</p> <p><b>Any other comments</b> - We would expect Elexon to provide clear guidance on implementation of each serial to ensure a consistence approach from each supplier/supplier agent.</p> <p>We would like to see J1257 Outstation Password Level 2 added to the Key Fields for serials HM11, HM12, HM13.</p> <p>NPower have concerns surrounding the Purpose of the Serials sections within appendix B as we do not feel that this reflects the true intentions of the serial review group. Our interpretation of the output from the review group was to move the focus of the serials away from being compliance based to the associated risk to settlements in line with the Performance Assurance Framework. We feel Compliance to the BSCPs should fall under the remit of the BSC Auditor and the PARMs should measure the risk to settlement. For example HM11 purpose of the serial section, we believe should read:</p> <p>“This serial measures the risk to settlement of HHDC not receiving the MTD’s in a timely manner following a material change to the metering system”</p> <p>Rather than the current:</p> <p>“100% of MTDs should be received by HHDCs by +15WDs of the HHDCs EFD following a change to the Metering Systems”.</p> <p>Could Elexon please confirm if our interpretation of this section is correct?</p>

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			<p>HM14 – The J0014 (date of action) in the D2 is not a mandatory field, How would D2's with this field not populated be reported?</p> <p>This measure is dependant on HHDC raising the fault in a timely manner after the detection of a meter fault and therefore could have a negative impact on perceived MOP performance.</p> <p>HM14 only considers where a fault has been detected and resolved it does not take into account any meter faults raised to MOP but are still outstanding.</p> <p>SP11, SP12, SP13 and SP15 Could we please have clarity on the following...</p> <ul style="list-style-type: none"> <li>• If an appointment and subsequently de-appointed SSD-1, should this be included in the PARMS reporting or discounted?</li> <li>• If, for a new gain, the HHDC appointment date is 1st June 2010, and the D0155 was received on the 28th May 2010; would the serial report this in May's submissions as this is when the D0155 was received; or would it be reported in June's submissions as this is the HHDC EFD? Currently the PARMS reporting only allows for active appointments in the current month.</li> </ul>
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### About Severity Codes

**H (High):**  
Prejudices document's conclusions, recommendations or fitness for purpose.

**M (Medium):**  
Matter of substance, but not high.

**L (Low):**  
Minor error but document's intention is clear.

## Comments on the redline text

No.	Organisation	Document name	Location	Severity Code	Comments
1	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	HM11	L	Need to correct D02268s to D0268s.
2	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	HM12	L	Remove "WD of required date" from the Service levels column.
3	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed	HM13	L	Change HHMOA to HM13 in the serial column

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Comments on the redline text

		Redlined Text v0.1			
4	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	HM14	H	In the Performance measure column “Number of D0002s received after Date Fault Suspected/Detected” this is not clear as a D0002 for Fault resolution is always received after the fault is suspected/detected. It needs to be re-worded.
5	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	Page 3	L	Need to provide serial name NM11 for the Timely sending of NHH MTDs to NHHDC.
6	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	Page 3	L	Need to provide serial name NM12 for the Missing NHHMTD. Need to correct NHHTD to NHH MTDs in the Sub-process column
7	TMA Data Management	Attachment D	Page 31	L	SP15 Data field 3: need to remove “Date” from the wording changing from DateCount of D0155 to Count of D0155
8	TMA Data Management	Attachment D	Page 42	L	HM11 Data to be corrected HM13 Data
9	TMA Data Management	Attachment D	Page 44	L	HM11 Data to be corrected HM14 Data
10	TMA Data Management	Attachment E	Page 27	L	What will agents have to do to submit the data? Data Collectors should be replaced with The Data Collector, to be consistent with the rest of the paragraph
11	TMA Data Management	Attachment E	Page 58	M	In the section “What will be submitted” the wording of “The total number of D0002s received after the Date Fault Suspected/Detected by reconciliation bands” needs to be revised as a D0002 will always be received after the Date Fault Suspected/Detected.

Comments on the redline text

12	TMA Data Management	Attachment E	Page 61	H	NM11 Purpose of serial“100% of MTDs should be received by NHHDCs by +5WDs of the NHHDCs EFDfollowing a change to or of the Metering System” The phrasing is confusing as it refers to NHHDC’s EFD but relates to a change to a metering system or of metering system.
13	IMServ	BSCP533 AppdxB	3.3.8	H	This measure does not take into account any issues that require resolution by parties other that the Meter Operator. Under these circumstances we would expect only D0005s to be sent providing updates, however this serial could encourage Meter Operators to send D0002 flows, effectively closing the issue, whilst waiting on actions by a third party.
14	IMServ	BSCP533 AppdxB	3.3.5	M	Serial suggests it is looking at time taken to submit a D0268 following a meter change, however the wording under ‘Purpose of Serial’ states that MTDs should be sent within 15 working days of the HHDC Effective From Date. Suggestion that this should refer to the Metering System Effective From Date
15	IMServ	BSCP533 AppdxB	3.3.9	M	Serial suggests it is looking at time taken to submit a D0268 following a meter change, however the wording under ‘Purpose of Serial’ states that MTDs should be sent within 15 working days of the NHHDC Effective From Date. Suggestion that this should refer to the Metering System Effective From Date
16	Scottish & Southern Energy	BSCP504 v25.2 redlined	Page 2, last row, re NC11		Typo - the Recipient should read as New NHHDC and the same with the Service Levels ..15WD of New NHHDC...

## Responses for CP1335 'Mandating use of Auxiliary Meter Technical Details Data flow'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
MRASCo Ltd	MRASCo	Yes	Yes	0
Spark Energy		Neutral	Yes	90
TMA Data Management Ltd (MPID UDMS)	HHDC, HHDA, NHHDA and NHHDC	Yes	Yes	90
Western Power Distribution	Distributor/MOA	Agree in principle subject to a couple of points below.	Yes	180
EDF ENERGY NETWORKS	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI	Yes	Yes	We are unable to give you accurate dates at this time
E.ON	Supplier	No	Yes	300
Electricity North West Limited	LDSO	No	Yes/No	0
EDF Energy	Supplier, NHH Agents, HH MOP	Yes	Yes	180
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	Yes	180

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### Summary of Responses

British Energy	Generator, Supplier, Trader Non Physical, Party Agent (CVA MOA)	Yes	Yes	30
E.ON UK Energy Services Limited	MOA & NHHDC	Neutral	Yes	180
British Gas	Supplier	Yes	Yes	6 months
IMServ	HHDC, NHHDC, MOA, NHHDA, HHDA	Yes	Yes	180
Scottish & Southern Energy	Supplier/ Generator/ Trader/ Party Agent/ Distributor	Yes	Yes	12 - 15 months
NPower Limited	Supplier/ Supplier Agents	Yes	Yes	Please see Response to Q4
Bglobal Metering		Yes	Yes	180

### Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
MRASCo Ltd	Yes	Yes	<p><b>Agree change comment</b> - Aligns with DTC CP 3310 'Introduction of a new flow to support additional information for Advanced Meters'. The new flow aims to ensure Meter Operators and Data Collectors are able to operate advanced meters successfully, especially following Change of Supplier and Change of Agent events.</p> <p><b>For which role is your organisation impacted?</b> MRASCO Ltd</p> <p><b>Please state what the impact is</b> - This is the corresponding change to DTC CP 3310.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No. The Release date coincides with the DTC and WPPS changes.</p>
Spark Energy	Neutral	Yes	<p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> - unsure but because of need for MTDS and with the implementation / installation of Smart Metering will need further information to assess properly.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Possibly unknown fully at this time.</p> <p><b>Associated costs:</b> Unknown at this time.</p>
TMA Data Management Ltd	Yes	Yes	<p><b>For which role is your organisation impacted?</b> NHHDC</p> <p><b>Please state what the impact is</b> - System and Procedure impact</p>

## Detailed Impact Assessment Responses

			<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs</b> - Cost would be high</p>
Western Power Distribution	Agree in principle subject to a couple of points below.	Yes	<p><b>Agree change comment:</b> 1. There is currently no need for the Distributor to receive the new flow as the remote disconnection capability, the only data item we are interested in, will be communicated by the meter type in the D0150. Our preference is therefore not to receive the new flow although it is fairly simple to just archive it if it is sent to us.</p> <p>2. Our understanding from the special MRA IREG at which the new flow was agreed was that the BSCP change would mandate the backfilling of data for the new flow, in particular the need to change the meter type for AMR meters already fitted. This does not appear to have been done. Although the backfilling of data is implied as the new flow will not be able to be sent if it is not done, we believe it would be clearer if this was made explicit.</p> <p><b>For which role is your organisation impacted?</b> Distribution MOA</p> <p><b>Please state what the impact is:</b></p> <p>Distribution – possible need to receive the new flow, depending on whether the MOA-Distributor instance of the flow is retained as part of the CP.</p> <p>MOA – System changes will be required.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
EDF Energy Networks	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Networks/Distribution</p> <p><b>Please state what the impact is</b> - Updating our systems to get it to recognise and load this new flow alongside the D0150</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs</b> - we are unable to give details of associated costs at this time</p>
E.ON	No	Yes	<p><b>Agree change comment</b> - We were not supportive of the associated change under the MRA DTC CP3310</p> <p><b>For which role is your organisation impacted?</b> Supplier, NHHDC and HHDC</p> <p><b>Please state what the impact is</b> - Changes to Supplier and DC systems</p> <p><b>Please explain the lead time</b> - As ELEXON are aware we are currently upgrading some of our systems therefore an implementation date of June 2011 or beyond would be beneficial.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes we would need to make changes to systems which we are currently in the process of replacing as well as ensuring that the new systems are compliant with the requirements of the change.</p>



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			<b>Associated costs</b> – not available
Electricity North West Limited	No	Yes/No	<p><b>Agree change comment</b> - As an LDSO we are unlikely to need the data contained in this flow. It may be better to redraft the DTC CP to remove the instance of the flow from MOp to Distributor.</p> <p><b>Any other comments</b> - At a recent IREG meeting, Elexon advised that they would draft the change to mandate the backfilling of the AMR data on this flow, but that doesn't appear to have been done?</p>
EDF Energy	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier, NHHDC and NHH MOP</p> <p><b>Please state what the impact is</b> - System and process changes are required</p> <p><b>Please explain the lead time</b> - As we are already aware of these requirements from associated MDB changes we are confident that February 2011 is a reasonable timeframe for this change.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No – release date for this change already known about.</p> <p><b>Associated costs</b> – not known</p>
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	No	Yes	<p><b>Agree change comment</b> - Though we agree with the sentiment of the CP and supported the related MRA change ScottishPower cannot at this time lend our support to the CP without a number of changes.</p> <p>During the development of the additional flow at Special IREG, it was our understanding that as the data item 'Remote Shutdown' was being highlighted in a new Meter Type RCAMY there was no reason for the Distribution businesses to receive the flow as there was no data held within it which was required. However, within the redline changes in the various attachments this has not been reflected and as such it is our opinion that either additional text should be included within the redline changes or a footnote should be added to the affected BSCPs which clearly highlights that the flow should not be sent to the LDSO.</p> <p>It was also our understanding that as there will be the requirement for backfilling of data on Go-Live there would be a necessity for all the data contained within the D0149/D0150 to be back filled to enable the new flow to be sent. There does not appear to be any reference to this within the CP. It is, in our opinion necessary for this to be included in the CP to ensure that the action is performed by MOAs to ensure consistency going forward from the Go-Live date.</p> <p>If these changes are made or accommodated then we would have no hesitation in supporting the CP.</p> <p><b>For which role is your organisation impacted?</b> LDSO, Supplier, MOA, NHHDC</p> <p><b>Please state what the impact is</b> - There will be both system and process changes required.</p> <p><b>Please explain the lead time</b> - We support the Feb 2011 implementation date.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your</b></p>

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			<p><b>organisation?</b> No</p> <p><b>Any other comments</b> - As stated above, we agree with the justification and support the aim of the CP. With the adoption of the changes stated above we would have no hesitation in fully supporting the CP.</p>
British Energy	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> - Update to processes</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
E.ON UK Energy Services Limited	Neutral	Yes	<p><b>Agree change comment</b> - We have significant concerns relating to the appropriateness of the new flow and as such are reluctant to support this change however if a participant determines that this flow is the solution they wish to adopt then unless the requirement to utilise this flow is incorporated into the BSCPs it is unlikely that we will amend our systems to accommodate this flow unless that participant is willing to meet the costs of such an amendment.</p> <p><b>For which role is your organisation impacted?</b> MOA &amp; NHHDC</p> <p><b>Please state what the impact is</b> - Development of system updates and associated procedures.</p> <p><b>Please explain the lead time</b> - We are highly (with others) dependent on the development of an appropriate solution by an external provider over whom we have little direct control.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> We will incur significant costs for little perceived benefit</p>
British Gas	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> - System changes to process new flow</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p>
IMServ	Yes	Yes	<p><b>For which role is your organisation impacted?</b> MOA, NHHDC</p> <p><b>Please state what the impact is</b> - Sending and processing of new flow</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Potentially, however the new flow itself has already been approved and therefore we already have knowledge of the changes being made.</p>
Scottish & Southern Energy	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier, Party Agents</p> <p><b>Please state what the impact is</b> - This is a significant change to our systems and processes.</p> <p><b>Please explain the lead time</b> - We believe that this would be a substantial change to our Customer and MOP systems and processes to accommodate the new flow and therefore anticipate that it would take 12- 15 months to allow for our IT scheduling.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your</b></p>

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## Detailed Impact Assessment Responses

			<p><b>organisation?</b> We may not be compliant. See our response above.</p> <p><b>Associated costs</b> - We estimate significant costs to make the necessary changes to our systems and processes.</p> <p><b>Any other comments</b> - As far as we understand from the April MDB, there appears to be no requirement for the Distributor to receive this flow and, therefore, there should be no need to make any changes to BSCP515 (as redlined Attachment C). This also means that the instance of MOA to Distributor needs to be removed from the flow as Distributors would not want unnecessary flows – expect that this would require a change to the DTC.</p>
NPower Limited	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Supplier and Supplier Agents</p> <p><b>Please state what the impact is</b> - Impact on systems and processes.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> A special meeting with Meter Operators is being held in July to discuss the implications of the package of changes to support this dataflow, but early implications are that the February implementation date will be challenging.</p> <p><b>Associated costs</b> - Costs are unknown at this time.</p> <p><b>Any other comments</b> - No</p>
Bglobal Metering	Yes	Yes	<p><b>For which role is your organisation impacted?</b> NHHDC &amp; NHHMO</p> <p><b>Please state what the impact is</b> - The cost of implementation and management of the information in both the NHHDC and NHHMO systems, further to this we would need to analyse the current meters installed in the field to back-fill the NHHMO and NHHDC systems with this information.</p> <p><b>Associated costs</b> - at this time the costs and timescales for such development have not been fully assessed but will run into £10,000s.</p>

**No comments received on the redlined text.**



### About Severity Codes

**H (High):**  
Prejudices document's conclusions, recommendations or fitness for purpose.

**M (Medium):**  
Matter of substance, but not high.

**L (Low):**  
Minor error but document's intention is clear.

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