SVG114/02

Meeting name	Supplier Volume Allocation Group (SVG)
Date of meeting	3 August 2010
Paper title	Change Proposal Progression
Purpose of paper	For Decision
Synopsis	This paper provides: • CP1334 and CP1335 for your consideration and agreement on their progression; and • a summary of all open Draft Change Proposals (DCPs) and Change Proposals (CPs).

1 Summary

1.1 Since SVG113 we have raised three Change Proposals (CPs) which we issued for BSC Party Impact Assessment via Change Proposal Circular 685 (CPC00685). Details of these changes can be found in Appendix 1 and 2.

1.2 This paper presents CP1334 and CP1335 for your consideration and agreement on their progression.

2 Change Proposals for Decision

2.1 CP1334 'New PARMS Serials'

2.1.1 We raised CP1334 on 28 May 2010 and subsequently issued it for impact assessment (via CPC00681) in June 2010.

2.1.2 CP1334 aims to address the limitations identified with the current suite of Performance Assurance Reporting and Monitoring System (PARMS) Serials by proposing 12 new PARMS Serials.

2.1.3 We received 15 responses from Parties covering all major role types; of these 7 agreed, 3 disagreed and 5 were neutral. A few suggestions were made by the respondents to correct the redline text. We agreed some of the changes should be made and they are not considered to be material.

2.1.4 For a full assessment of CP1334 and the suggested amendments to the redlining please refer to Appendix 1.

2.1.5 We believe the new Serials proposed by this CP will provide better metric data to monitor Suppliers and Supplier Agents performance compared with the existing ones, and recommend that you:

- **AGREE** our suggested amendments to the redline text; and
- **APPROVE** CP1334 for implementation in the February 2011 Release.

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2.2 CP1335 'Creation of New Auxiliary Meter Technical Details Data flow'

2.2.1 On 29 April 2010, the MRA Development Board approved a solution to allow technical details specific to advanced meters, e.g. communication methods and addresses, to be exchanged between participants. The MRA solution introduced a new data flow 'Dxxxx - Auxiliary Meter Technical Details' which needs to be reflected within the BSC.

2.2.2 We raised CP1335 on 28 May 2010 and subsequently issued it for impact assessment (via CPC00681) in June 2010.

2.2.3 We received 16 responses to CPC00681. Of these 11 agreed, 3 disagreed and 2 were neutral.

2.2.4 The respondents who supported the change believed that it aligned with the MRA change and reduced interoperability issues.

2.2.5 Some of the respondents who disagreed with CP1335 believed that the new data flow should not be issued to Distributors because they do not require or use the information, and that Meter Operator Agents (MOA) should be responsible for backfilling of data for all Metering Systems impacted by the Dxxx flow. We agree with these respondents and have amended the relevant redline text accordingly.

2.2.6 For a full assessment of CP1335 and the suggested amendments to the redlining please refer to Appendix 2.

2.2.7 We recommend, based on increased transparency and majority industry support, that you:

- **AGREE** the suggested amendments to the redline text; and
- **APPROVE** CP1335 for implementation in the February 2011 Release.

3 Summary of Recommendations

3.1 We invite you to:

a) **AGREE** our suggested amendments to the redline text for CP1334;

b) **APPROVE** CP1334 for implementation in the February 2011 Release;

c) **AGREE** our suggested amendments to the redline text for CP1335; and

d) **APPROVE** CP1335 for implementation in the February 2011 Release.

Stuart Holmes

ELEXON Configuration Manager

T: 020 7380 4135

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Appendix 1 – CP1334 Detail of Industry Impact Assessment
Appendix 2 – CP1335 Detail of Industry Impact Assessment
Appendix 3 – New Change Proposals
Appendix 4 – Summary of Open Change Proposals
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List of Attachments:

Attachment A – CP1334 v1.0
Attachment B – CP1334 Redline changes to BSCP504
Attachment C– CP1334 Redline changes to BSCP514
Attachment D – CP1334 Redline changes to BSCP533
Attachment E – CP1334 Redline changes to BSCP533 Appendix A
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Attachment P – CP1335 Redline changes to SVA Data Catalogue Volume 2

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Appendix 1 – Detailed analysis of CP1334 'New PARMS Serials'

1 Why Change?

1.1 PARMS Serials

1.2 The Performance Assurance Reporting and Monitoring System (PARMS) is a database that contains information on the performance of Suppliers and their Supplier hubs against a set of Serials[1]. Each Serial focuses on a process or requirement drawn from the obligations in the BSC or its subsidiary documents and which industry agrees should be monitored for assurance purposes. Each Serial comprises one or more Standards which are performance measures associated with the relevant process or requirement.

1.3 Performance data relating to each of the Serials is submitted to PARMS by participants on a monthly basis.

1.4 Impact of P207

1.5 Prior to Modification P207[2] being implemented, Serials were used primarily to provide metric data on key industry processes. Under the new risk based approach to assurance, participants are monitored against key risks via the Settlement Risk Report, their dashboards and Risk Management Plans (RMPs).

1.6 The Risk Evaluation Register (RER) details the risks to Settlement and gives them a net significance based on probability, impact and control strength. There are currently 180 Settlement Risks (for both Central Volume Allocation (CVA) and Supplier Volume Allocation (SVA)). Of the top Settlement Risks for Performance Assurance Operating Period April 2010 to March 2011, only eight have an applicable PARMS Serial. At the time of PARMS Serial Review, there were only 39 Settlement Risks covered by PARMS Serials. For those risks that are mapped to a PARMS Serial, not all the standards can be used to provide performance data against these Settlement Risk. Therefore the Serials, in their current format, are not necessarily monitoring the right areas.

1.7 PARMS Serial Review

1.8 A review of the PARMS Serials was approved by the Performance Assurance Board (PAB) in September 2008 and was carried out by a group comprising ELEXON staff and industry experts. The Review Group determined that a number of Serials no longer provide meaningful metric data for Settlement Risks. The remaining Serials were not considered to fully measure the risks in the RER. It was the Group's opinion that these Serials could be amended to better align to the key Settlement Risks.

1.9 Those Serials associated with Supplier Charges were outside the scope of the review. The ELEXON website has details of the industry consultation carried out on behalf of the group, and the Final Outcome Report to PAB (PAB105/05).

[1] Please refer to the following link for information on PARMS Serials - Performance Monitoring and Reporting.
[2] Modification P207 'Introduction of a new governance regime to allow a risk based Performance Assurance Framework (PAF) to be utilised and reinforce the effectiveness of the current PAF'.

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The Problem

1.10 Overall there are nine PARMS Serials which cover Risk areas that the PAB, PARMS Serial Review Group and industry consultation respondents (8 out of 15) agreed need monitoring through the use of Serials. These are:

Serial Reference	Data Provider
SP05 (Retrospective Appointment of Agents)	DC & MOA (HH & NHH)
SP06 (D0148[3] Flow from Suppliers)	DC & MOA (HH & NHH)
HM04 (Provision of HH MTD to HHDC) & HM05(Provision of HH MTD to New HHMO)	HHMOA
HM06 (Quality of D0268[4])	HHDC
NM03 (Provision of NHH MTD to NHHDC) & NM04 (Provision of NHH MTD to New NHHMO)	NHHMOA
NC02 (NHHDC to NHHDC Meter Reads and History)	NHHDC
HM01 (HH Meter Faults: Time Taken to Resolve)	HHDC

1.11 The Review Group concluded that the Serials listed above are too basic in their current form and recommended to replace them with new improved Serials to better measure the associated risks in the RER. The current Serials were designed to measure non-compliance against BSCP obligations, and as such they do not measure, or give any indication of, any associated actual risk to Settlement. Using the current Serials to monitor the level of risk that Performance Assurance Parties (PAPs) pose to Settlement may result in the PAB not targeting those PAPs with genuine underperformance.

1.12 Overall, the PAB, PARMS Review Group and industry consultation respondents recognised extensive issues with the current Serials which lead to unreliability and variations in reporting. The new Serials will better facilitate the reporting of PAPs' performance and aid Suppliers that use the Serials to identify potential issues with their agents.

1.13 In addition Meter Operator Agent (MOA) submissions are not currently split into Half Hourly (HH) and Non-Half Hourly (NHH) activities, making it difficult to identify the causes of underperformance and therefore the risk to Settlement.

2 Solution

2.1 In order to address the limitations identified with the current suite of PARMS Serials, 12 new Serials are proposed. The new Serials will:

- Quantify the risk to Settlement, of business processes, by measuring if that process has been completed by each Settlement Run. To do this, they will either report whether the events occur in a timely fashion in relation to the relevant Effective From Date or how many of the events have failed completely (as these represent different risks);
- Provide context to the risk by reporting the total number of events (business processes) for a given reporting period;

[3] D0148: Notification of Change to Other Parties
[4] D0286: Half Hourly Meter Technical Details

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- Report at GSP Group level to aid consistency and localisation of issues; and
- Look at the current reporting period (equates to the '**t**' period for the current PARMS Serials) and remove the concept of **t-1** Serials to make the Serials more uniform and easier to report

2.2 Furthermore MOA submissions will be split into distinct Serials to measure HH and NHH MOA activities to improve the ability to quantify the different risks to Settlement.

2.3 The table below summarises the new serials proposed by this Change Proposal:

New Serial	What does this Serial measure?	Who should submit the Serial?
1	**The risk that Suppliers do not appoint agents in a timely manner which may result in an agent rejecting Meter Technical Details, Meter readings being misinterpreted or not collected or default data entering Settlement.**	New HHDC
2	**The risk that Suppliers do not inform associated Data Collectors in a timely manner of changes to the Data Aggregator in the Supplier hub resulting in default data entering Settlement.**	HHDC
3	**The risk that Suppliers do not inform associated Data Collectors in a timely manner of changes to the Meter Operator Agent in the Supplier hub resulting in missing Meter Technical Details and Meter readings being misinterpreted or not collected.**	HHDC
4	**The risk that Suppliers do not inform associated Meter Operator Agents in a timely manner of changes to the Data Collector in the Supplier hub resulting in missing Meter Technical Details and Meter readings being misinterpreted or not collected.**	HHMOA
5	**The risk that Suppliers do not inform associated agents of changes to the Supplier hub resulting in missing Meter Technical Details and Meter readings being misinterpreted or not collected.**	NHHMOA
6	**The risk that MOAs do not inform DCs in a timely manner the HH MTDs resulting in Meter Readings being misinterpreted or not collected.**	HHDC
7	**The risk that missing HH MTDs result in Meter Readings being misinterpreted or not collected and the inability to issue HH MTDs to other agents.**	Example: New HHDC reporting on the HH MOA
8	**The risk that the quality of the HH MTDs sent results in Meter Readings being misinterpreted or not collected and inability to issue HH MTDs to other agents.**	HHDC submitting on the quality of the HH MTDs sent by the HH MOA
9	**The risk that MOAs do not inform DCs in a timely manner the NHH MTDs resulting in Meter Readings being misinterpreted or not collected.**	NHHDC
10	**The risk that missing NHH MTDs results in Meter Readings being misinterpreted or not collected and the inability to issue NHH MTDs to other agents.**	New NHHMOA submitting on the old NHH MOA
11	**The risk that on a change of NHHDC the new NHHDC does not receive historic NHH Metered Data/final Meter Readings that are required to validate and process subsequent readings resulting in the use of default or old data in Settlement.**	New NHHDC submitting on the performance of the old NHHDC
12	**The risk that HHMOAs do not resolve Meter Investigation requests in a timely manner resulting in estimated data entering Settlement.**	HHDC
13	**Additional guidance on submitting the SP04 Serial. The structure of this Serial is out of scope.**	Supplier

For full details on the proposed new Serials please see attached redlined documents.

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2.4 Amending the PARMS Serials above will require modification of the PARMS software. Logica, as the PARMS Service provider, would carry out this change. During the PARMS Serial review Logica gave an indicative figure of £38,000 to implement these changes from respondents as part of the consultation with industry for the PARMS Serial Review. Most respondents provided high level details of the impact of implementing a revised suite of PARMS Serials but limited information in terms of costs and timescales.

3 Intended Benefits

3.1 The new Serials will provide improved metrics on the volume of failures which will facilitate PAB and Suppliers in the on-going assessment of the "likelihood" and "significance" of the Settlement Risks and also serve as an indicator of the areas in Settlement which require more focus. The new Serials will better fit the objectives of the Risk-based Performance Assurance Framework (as introduced by Modification P207) by better quantifying the risk to Settlement (12/15 industry consultation respondents agreed).

3.2 Both the PARMS Serial Review Group and the PAB have recognised that the implementation of P207 has led to increased discussions between ELEXON, the PAB, Suppliers and Supplier Agents to better understand Suppliers' and Supplier Agents' underperformance indicated by the Serials. As such Suppliers and Supplier Agents have reported to ELEXON that Serials can be a useful indicator of performance. Introducing more focused Serials will improve this performance monitoring and further advance the associated dialogue.

3.3 The majority of industry respondents from the PARMS Serial review endorsed the view that the current Serials do not fully support the assessments of performance against key Settlement Risks (10/15 industry consultation respondents agreed) and supported the high level structure and intentions of the new Serials (8/15 industry consultation respondents agreed).

3.4 Splitting Meter Operator Agent submissions into Half Hourly and Non Half Hourly will give a more accurate view of the issues and will make performance monitoring more transparent. 14 out of 15 industry consultation respondents supported this proposal.

3.5 The proposed new Serials focus on key business processes, which will be relatively 'future proof' against any changes to BSC arrangements made in response to AMR or smart metering. Therefore it was concluded by the PARMS Review Group and the PAB that the need to amend the new Serials in the future would be limited as these processes would still be required.

4 Industry Views

4.1 We issued CP1334 for impact assessment in June 2010 (via CPC00681). We received 15 responses; of these 7 agreed, 3 disagreed and 5 were neutral.

4.2 Those opposed to the change are not convinced whether:

- the costs involved to the industry could not be justified by the benefits; and/or
- the new serials would 'help' suppliers with agent performance – given their view that most Suppliers and Supplier Agents have their own performance and reporting processes.

4.3 One respondent is against the change because they believe the new serials would not add any clarity and usefulness to the PARMS serials and Party agents would continue to use their own internal reporting to look for discrepancies. In their view, there is always a risk when looking at reporting that we get lost in the amount of information provided.

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4.4 We explained to the respondent that the new Serials were created by industry experts and reviewed by the industry via a consultation. All Parties were invited to join the review group. The existing Serials measure non-compliance and do not give any indication of the risk to Settlement. The PAB and the majority of industry responses agreed that the new Serials better fit the objectives of the Risk-based PAF.

4.5 Due to the fluidity of the Risk Based PAF, one respondent felt the new serials appear to be a temporary solution. The retained serials should continue as existing, but other Performance Assurance Techniques (PATs) should be explored to address those risks associated with the transfer of key data for the integrity of Settlements.

4.6 We explained to the respondent that given the new Serials' focus on key business processes, the review group felt they would be relatively future proof. The risks to Settlement will inevitably change over time, as do the operations of any forward looking company. It is essential that the measures we have in place to monitor PAPs' performance moves with the changes in the market. Otherwise the level of assurance and the risk to Settlement, which potentially affects all BSC Parties cannot be effectively maintained. The existing Serials were originally designed to measure non-compliance whereas the new Serials better fit the risk based approach taken in the PAF. ELEXON welcomes any input from Participants regarding any stage of the PAF cycle.

5 Impacts and Costs

Market Participant	Cost/Impact	Implementation time needed
PARMS AMD Service Provider	The estimated cost to implement these changes is £38K.	February 2011 Release suitable
ELEXON (Implementation)	The approximate cost for ELEXON to implement these changes is 151 Working Days, which is equivalent to £36K[5]. If any of the new Serials are to be included in Supplier Charges (which doesn't seem to be the case, based on the scope of the Serial review), there will be an additional impact on the "Supplier Charge Apportionment" application. The impact on this can be estimated once the apportionment rules for those serials have been agreed.	February 2011 Release suitable
HHDC, NHHDC, HHDA and NHHDA	System and process changes are needed. Additionally, DC will need to allocate resource to apply software patches, PARMS serials are accessed via internal intranet links so these will need to be amended. Due to current system enhancements that they are making, they may need to make changes to both old and new systems.	February 2011 Release suitable

[5] Please note the cost is estimated on the assumption that CP1334 is the only change to be implemented in February 2011 release. We believe there will be more CPs to be submitted between now and August aiming for this release, and the actual implementation cost for this CP will be lower than the one quoted above, as the release cost will be shared by the CPs in the same release.

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MOA	One MOA will need to carry out significant I.T. work to decommission existing & develop new scripts. They 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. They indicated the I.T development costs is estimated to be £10k.	*It will be difficult to schedule I.T changes in time for the February 2011 release*
Supplier	One Supplier is in the view that in order to cope with the fundamental changes within the new serials, they will need to make major adjustments and is likely to incur significant costs.	*February 2011 Release not suitable*

6 Implementation Approach

6.1 We have considered the minority respondents' concerns that the proposed implementation date of 1 March 2011 would provide insufficient lead time given the scale of the change required. We believe the earlier the new PARMS Serials can be introduced, the earlier the Suppliers and Supplier Agents performance can be better monitored. Also 11 out of 15 of the respondents feel the February 2011 release would be achievable.

6.2 We therefore recommend CP1334 to be implemented on 1 March 2011, as part of the February 2011 release. We believe it is more efficient to have the CP apply from the beginning of a reporting period (calendar month), rather than 24 February 2011.

7 Recommendations

7.1 We believe the new Serials proposed by this CP will provide better metric data to monitor Suppliers and Supplier Agents performance compared with the existing ones, and recommend you:

- **AGREE** our suggested amendments to the redline text; and
- **APPROVE** CP1334 for implementation in the February 2011 Release.

Contact the Lead Analyst:
Bu-Ke Qian
ELEXON Change Management
T:020 7380 4146

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Table 1: Industry Impact Assessment Summary for CP1334 – New PARMS Serials

IA History CPC number	CPC00681	Impacts	BSCP504, BSCP514, BSCP533, BSCP533 Appendix A, B, C, SVA Data Catalogue Volume 1

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days 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
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

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Table 2: Impact Assessment Responses[6]

Organisation	Agree?	Impacted?	Comments	ELEXON Response
MRASCo Ltd	Yes	No	**Agree change comment** – Better metrics to monitor Suppliers and Supplier Agents. **Please explain the lead time** - This change does not affect the MRA product set. **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs?** No	-
TMA Data Management Ltd	No	Yes	**Agree change comment:** 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.	The new Serials were created by industry experts and reviewed by the industry via a consultation. All Parties were invited to join the review group. The existing Serials measure non-compliance and do not give any indication of the risk to Settlement. The PAB and the majority of industry responses agreed that the new Serials better fit the objectives of the Risk-based PAF. The review group did acknowledge that Supplier Agents are as unlikely to use the new Serials as the existing ones. And whilst the new Serials could be seen as more complex than the existing Serials, the group felt that the advantage of the additional information helped to measure the associated processes in a clearer, more transparent way. The new Serials therefore provide significant benefits over the existing Serials. Moreover, the PAB felt the new Serials added enough benefit over the existing ones to endorse the raising of this CP. The PAB have also indicated that they will be increasing their focus on Supplier Agents and that the new Serials will better facilitate this aim.

[6] Please note that we have only included responses in this table where the respondent provided additional information.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			For which role is your organisation impacted? HHDC, HHDA, NHHDC and NHHDA **Please state what the impact is -** Impact on systems and procedures **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs** - The cost would be high as it is a radical change in the PARMS logic. **Any other comments** - We are - opposed to CP1334, not only is the cost involved to the 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. 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 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 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	We believe that other BSCP obligations should take priority, as stated in Attachment E (BSCP533 Appendix B 2.1.1). For example the existing Serial NM03 does not align with BSCP504. In this case the requirement in BSCP504 is considered the more stringent and therefore the obligation to meet. The new Serials are designed to better measure the risk failures/delays in the process pose to Settlement, where as the existing Serials were originally designed to measure non-compliance against the obligations. As such, the new Serials are not trying to measure compliance, but rather, give an indication of the risk to Settlement. We will revisit the standards as part of the 'Purpose of the Serial's proposed by the new PARMS Serials, and compare them with the timescales set out in the relevant BSCPs and report the outcome to PAB on its meeting in July 2010. For example, to align **HM11** with the timescales in **BSCP502**[7], we would recommend to change the wording under 'Purpose of the Serial' from: "100 % of MTDS should be received by HHDCs by

[7] BSCP502 - Half Hourly Data Collection for SVA Metering Systems Registered in SMRS

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			metering change when 99% of the HH data must be actual by SF (15WD after the Settlement date). 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. 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?	15WDs of the HHDCs EFD following a change to the Metering System." …to "100 % of MTDs should be received by HHDCs by +5WD of the D0268 EFD (J1254) following a change to or of the Metering System." Similarly, to ensure the consistency between **NM11** and **BSCP504**[8], we would recommend to change the wordings under the 'Purpose of the Serial' from: "100% issued to NHHDC within 5 WD of required date" to: "100% of MTDs should be received by NHHDCs by +10 WDs of the D0150 EFD (J1254) following a change to or of the Metering System." As for HM11 above, this change will not impact the way the Serial is reported, because the standards are reported by reconciliation bands. The respondent is satisfied with this approach.
Western Power Distribution	Neutral	Yes	**For which role is your organisation impacted?** MOA **Please state what the impact is -** Significant I.T. work to decommission existing & develop new scripts. **Please explain the lead time -** 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. **Would implementation in the proposed Release have an adverse impact on your organisation?** YES **Please state impact -** It will be difficult to schedule I.T changes in time for the February 2011 release. **Associated costs -** Estimate £10,000 I.T development costs	Impact noted.

[8] BSCP504 - Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
E.ON	Yes	Yes	**For which role is your organisation impacted?** Supplier and DC **Please state what the impact is -** 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 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. **Please explain the lead time -** Minimum of 6 month notice **Would implementation in the proposed Release have an adverse impact on your organisation?** If we are given less than 6 months notice this could be problematic. **Associated costs -** Not available at this point	-
EDF Energy	Neutral	Yes	**For which role is your organisation impacted?** All roles will be impacted major impact is on agents **Please state what the impact is -** Rewrite of internal PARMS reporting suite is required to manage changes to serials. **Please explain the lead time -** 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. **Would implementation in the proposed Release have an adverse impact on your organisation?** 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. **Associated costs -** Not known **Any other comments** - 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	We will endeavour to improve the example calculation tables. Following the approval of this CP,

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			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.	we will investigate the issue internally and raise a new CP to update those examples in BSCP533 Appendix C as appropriate.
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Yes	Yes	**Agree change comment:** We agree with the changes in CP1334, however we question two points: 1. Why are the timescales for NM03 & 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. 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? **For which role is your organisation impacted?** MOP, NHHDC, HHDC **Please state what the impact is** - Systems will have to be significantly changed to accommodate the new serials and remove the obsolete serials. **Please explain the lead time** - 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. **Would implementation in the proposed Release**	It was felt by the PAB that CP1334 might not get approved due to industry resistance. As a precaution, ELEXON took to the chance in CP1325 to improve the PARMS BSCPs and correct the error in the exclusion rule for NM03 and NM04 created by CP1248v2.0. If CP1334 does get approved then ELEXON will not be conducting assurance checks to ensure the NM03 and NM04 changes have been implemented. If CP1334 is implemented, February 2011 will be the last reporting period that the existing Serials are reported. In practice, this means all data relating to February 2011 and therefore the existing Serials should be submitted to PARMS by +20 WD after the end of February 2011. For t-1 Serials this means January 2011 will be the last reporting period that these Serials look for any start events. In effect this means, any start events that occur in February 2011 for t-1 Serials, will not be reported on. ELEXON will inform the PAB of this omission.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			have an adverse impact on your organisation? No adverse impact anticipated. **Any other comments** - We would recommend that the changes to NM03 & 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.	
British Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is** - System impact **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-
E.ON UK Energy Services Limited	Yes	Yes	**For which role is your organisation impacted?** MOA NHHDC **Please state what the impact is** - PARMs reporting Suite and associated procedures will need to be updated **Would implementation in the proposed Release have an adverse impact on your organisation?** Assuming a relatively swift decision on this CP then the proposed date should not present an issue. **Associated costs** - Not Available at this time	-
British Gas	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is -** Management of agent performance **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs** - Minimal direct costs for supplier but agents will need to make system changes to produce new reports	-
IMserv	Yes	Yes	**For which role is your organisation impacted**? HHDC, NHHDC, MOA **Please state what the impact is -** Development and implementation of a number of new PARMS serials and decommissioning of existing serials.	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Would implementation in the proposed Release have an adverse impact on your organisation? 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.	
Scottish & Southern Energy	No	Yes	**Agree change comment** - 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. With regards to 'helping' suppliers with agent performance; • 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. • 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	Given that the new Serials focus on key business processes, the review group felt they would be relatively future proof. The risks to Settlement will inevitably change over time, as do the operations of any forward looking company. It is essential that the measure we have in place to monitor PAPs performance moves with the changes in the market. Otherwise the level of assurance and the risk to Settlement, which potentially affects all BSC Parties cannot be effectively maintained. The existing Serials were originally designed to measure non-compliance, where as the new Serials better fit the risk based approach taken in the PAF. ELEXON welcomes any input from Participants regarding any stage of the PAF lifecycle e.g. the RER. It is necessary to provide assurance to the rest of the industry that Suppliers and Supplier Agents are meeting their obligations and not posing a significant risk to Settlement. The data provided from the new Serials will allow the PAB to better target those who pose the biggest risk to Settlement. The review group acknowledged that most Suppliers and Supplier Agents have their own

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			should already be aware if there is any issue with an agent 'failure' in any areas. 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. 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? **For which role is your organisation impacted**? Supplier and Party agents **Please state what the impact is -** 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. **Please explain the lead time -** 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	performance and reporting processes. However, these internal processes are not applicable to all, and therefore PARMS Serials are required to reduce the risk to Settlement. All of the new Serials will be reported by GSP Group level. We recognise the costs associated with this change, but considered that the new, more focussed Serials could lead to improvements in performance and ultimately drive costs down as Suppliers and agents focus on improving performance. The aims of the Serial Review were to assess if any existing Serials should be refined or excluded and any new Serials introduced. It was the review group and the PABs view that the new Serials are required as they better fit the risk based approach introduced under P207. Views from an industry impact assessment for CP1325 suggested that the impact and costs associated with implementing CP1325 would be low.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			incorporate for the decommissioning of the removed serials, following implementation of the CP1325. **Would implementation in the proposed Release have an adverse impact on your organisation?** Yes, we would not be compliant. This is not a fair position to put us in. **Associated costs -** 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. **Any other comments:** Yes: • 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 up to two years to implement them. • Especially in view of the likely future changes in the industry with the introduction of Smart Metering and increasing volumes of AMR. • 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. • 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.	Due to the nature of the industry changes in the processes and obligations are always changing. It was the view of the review group that the new Serials would be relatively future proof given the key processes they would be measuring (this includes Smart Metering). It would be fair to say that at any given time any performance measures or Serials could be viewed as not fit for purpose in the next five years, given the changing nature of the industry, however the new Serials are a significant improvement over the existing Serials.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
				Logica will be making any necessary changes to PARMS. We have worked closely with Logica to assess the changes, and the impact of CP1334. We believe the new system (implemented as part of Modification P99) is more robust to change than the original PARMS System.
NPower Limited	No	Yes	**Agree change comment** - As it is currently drafted we would not be supporting this change unless our concerns raised in question 6 can be suitably addressed. **For which role is your organisation impacted?** Supplier and Supplier Agents **Please state what the impact is -** System and Process Impacts **Please explain the lead time -** Providing the issues listed in question 6 have been sufficiently addressed **Would implementation in the proposed Release have an adverse impact on your organisation?** As per response to question 3 **Associated costs** - Costs not yet known **Any other comments -** We would expect Elexon to provide clear guidance on implementation of each serial to ensure a consistence approach from each supplier/supplier agent.	Clear guidance can be found in attachment E – BSCP533 Appendix B. The respondent has replied that they would like assurance that issues currently experienced within PARMS submission quality are not repeated and checks will be in place to ensure consistency of interpretation e.g where Party/Party Agents ask for clarification around interpretation of a scenario, the resulting advice is relayed to the whole of the

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
				market not just the raising party.
			We would like to see J1257 Outstation Password Level 2 added to the Key Fields for serials HM11, HM12, HM13.	The key fields only apply to HM11 and HM13. It is ELEXON's opinion that a change to J1257 can be changed without any actual change to the Meter. Furthermore, the key fields list has be compiled from BSCP514. It seems sensible to maintain consistency between the two. The respondent is happy with this approach.
			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: "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" Rather than the current: "100% of MTDs should be received by HHDCs by +15WDs of the HHDCs EFD following a change to the Metering Systems". Could Elexon please confirm if our interpretation of this section is correct?	The new Serials are designed to better monitor the risk to Settlement. However, non-compliance does pose a risk to Settlement. The requirements stated under the 'Purpose of the Serial' section should be considered in isolation from other BSCP obligations as stated in the general assumptions section in Appendix B 2.1.1. ELEXON feel it is important to have a standard (as stated under the 'Purpose of the Serial' sections) and the associated risk to Settlement if that standard is missed. The respondent responded that they appreciate the fact that non compliance does pose a risk to settlements, however the proposed standards do

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
				not measure compliance as described in the relevant BSCPs. They believe that the assumption in appendix B section 2.1.1 to set timescales differently to the associated BSCP adds an extra layer of complexity to an already complex process and is completely unnecessary.
			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?	The J0014 data item will be removed from the Serial. It is the J0012 data item that should be used along with the date the D0002 was received. The respondent is happy with this explanation.
			This measure is dependent 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. 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. SP11, SP12, SP13 and SP15 Could we please have clarity on the following…	One of the main issues with the current Serial is that D0001s can be sent multiple times for the same issue, distorting the figures. And as there are so many D0001s floating about, it is impossible to map them to D0002s meaning that the number of unclosed problems would be completely wrong. The respondent is happy with the clarification we gave above.
			• If an appointment and subsequently de-appointed SSD-1, should this be included in the PARMS reporting or discounted?	It should be continue to be reported unless it is subsequently discovered to be an erroneous appointment or a de-energised HH connection or an UMS – as detailed in Appendix B 2.1.1. The respondent is happy with this approach.
			• 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.	It should be reported for the May 10 reporting period as this is when it was received and loaded in to the recipients (HHDC) system – as detailed in Appendix B 2.1.1. On this occasion this instance would only be reported against standard 1 in SP11. The respondent is happy with this approach.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response

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Table 3: Comments on the redline text

No.	Organisation	Document name	Location	Severity Code[9]	Comments	ELEXON Recommendation
1	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	HM11	L	Need to correct D02268s to D0268s.	ELEXON recommends that the change should be made. Service Level of HM11 will be reworded to: "…100% of D0~~2~~268s received by HHDC"
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.	ELEXON note that the wording "WD of required date" no longer exists in the Service Level of HM12, but instead Recommend the following change should be applied: "…~~by~~ within 15 WDs of Agent's EFD following a change of Agent"
3	TMA Data Management	CP1334 Attachment – BSCP514 v18.2 conformed Redlined Text v0.1	HM13	L	Change HHMOA to HM13 in the serial column	ELEXON recommends that the change should be made. Serial "HHMOA" will be changed to "HM13" In addition, we have taken the opportunity to add "None" in the Service Level for HM13 to remain consistent with the table format of BSCP514.
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.	ELEXON recommends that the change should be made. We suggest the column to be reworded to: "Total number of D0002s received, spilt by reconciliation bands, based on the time elapsed since ~~after~~ Date Fault Suspected/Detected" We have also added "100% of D0001 flows resolved within +15 WD" in the Service Level for HM14.

[9] High, Medium or Low

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No.	Organisation	Document name	Location	Severity Code[9]	Comments	ELEXON Recommendation
						This change is not presenting participants with any new information. It is already contained in BSCP533 Appendix B and other relevant BSCPs. The respondent agrees with our suggestion.
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.	ELEXON recommends that the change should be made. The Serial name will be inserted in the appropriate cell. We also suggest to amend the Service Level to fit amended standard for NM11: "100% of D0149/D0150 received by NHHDCs by +10WDs of the NHHDCs EFD" This change is not presenting participants with any new information. It is already contained in BSCP533 Appendix B and other relevant BSCPs. The respondent is happy with this approach.
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	ELEXON recommends that the change should be made. We also suggest to amend the Service Level to fit amended standard for NM12: "100% of D0149/D0150 received by new or current NHHDCs and new NHHMOAs by +5WDs of the agent's EFD." We recommend to change the Reporting Method for NM12 to be: "NHHDC or NHHMOA" These changes are not presenting participants with any new information. It is

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No.	Organisation	Document name	Location	Severity Code[9]	Comments	ELEXON Recommendation
						already contained in BSCP533 Appendix B and other relevant BSCPs.
7	TMA Data Management	Attachment D	Page 31	L	SP15 Data field 3: need to remove "Date" from the wording changing from Date Count of D0155 to Count of D0155	ELEXON recommends that the change should be made.
8	TMA Data Management	Attachment D	Page 42	L	HM11 Data to be corrected HM13 Data	ELEXON recommends that the change should be made. HM11 Data to be corrected HM13 Data
9	TMA Data Management	Attachment D	Page 44	L	HM11 Data to be corrected HM14 Data	ELEXON recommends that the change should be made. 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	ELEXON recommends that the change should be made. Data Collectors should be replaced with The Data Collector
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.	ELEXON does not recommend that the change should be made. We think what the respondent's observation is true, but this is what the Serial is measuring. measuring, i.e. the total number D0002s received between the receive date and the date the fault was suspected/detected. So we would suggest: "Total number of D0002s received, spilt by reconciliation bands, based on the time elapsed since Date Fault Suspected/Detected" would be better. The respondent agrees with our suggestion.
12	TMA Data	Attachment E	Page 61	H	NM11 Purpose of serial"100% of MTDs should be received by	ELEXON does not recommend that the change should be made for the same

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No.	Organisation	Document name	Location	Severity Code[9]	Comments	ELEXON Recommendation
	Management				NHHDCs by +5WDs of the NHHDCs EFD following 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.	comments above.
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.	The respondent believes the new serial would encourage Meter Operators to send D002 flows to close the issue, regardless the issue has been resolved or not. Observation noted.
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	ELEXON recommends that the change should be made. We suggest the new wording to be: "100 % of MTDs should be received by HHDCs by +5WD of the D0268 EFD (J1254) following a change to or of the Metering System."
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	ELEXON recommends that the change should be made. We suggest the new wording to be: "100% of MTDs should be received by NHHDCs by +10 WDs of the D0150 EFD (J1254) following a change to or of the Metering System."

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No.	Organisation	Document name	Location	Severity Code[9]	Comments	ELEXON Recommendation
					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…	ELEXON recommends that the change should be made. "HHDC" to be changed to "NHHDC"

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Appendix 2 – Detailed analysis of CP1335 'Creation of New Auxiliary Meter Technical Details Data flow'

1 Why Change

1.1 Background

1.1.1 On 6th April 2009 a new Supply Licence Condition came into effect that required the installation of advanced meters for Profile Class 5-8 sites. To support this new condition, Master Registration Agreement (MRA) Parties devised an interim manual solution to allow technical details specific to advanced meters, e.g. communication methods and addresses, to be exchanged between participants.

1.2 Why the need for Change

1.2.1 On 29 April 2010, the MRA Development Board approved an enduring solution in the form of a new data flow, the Dxxx 'Auxiliary Meter Technical Details', which is designed to be sent alongside the D0150 NHH Meter Technical Details flow in cases where advanced meters are fitted. A corresponding MRA Working Practice requires that this flow, or at least the information contained within it, should be mandatory where the relevant conditions apply.

1.2.2 It is important to note that the conditions established by the MRA solution are based around the Meter Type data item, rather than either the Profile Class or a definition of 'advanced meter'. The Working Practice states that:

"Where a new installation of a meter intending to be remotely read occurs but the communications are not operating initially, the Meter Type should be set to 'N', and the D0149/D0150 sent. When the communications are installed and operational on the metering equipment the Meter Type should be changed to NCAMR RCAMR or RCAMY, and the D0149/D0150 and Dxxxx sent."

1.2.3 NCAMR, RCAMR and RCAMY are Meter Type codes that are used to denote remote read capability; a full definition is available from the MRASCo website here[10].

1.2.4 To provide robust governance for the use of this flow, it needs to be referenced in the relevant BSC Procedures. Furthermore, the data flow includes a new data item, 'Communications Provider ID', whose valid set is to be maintained through Market Domain Data.

2 Proposed Solution

2.1 We raised CP1335 on 28 May 2010 and subsequently issued it for impact assessment via CPC00681 in June 2010. CP1335 aims to align the BSC with the MRA change.

2.2 The following Code Subsidiary Documents (CSDs) will need to be amended in order to align the BSC with the proposed changes:

- **BSCP504 and BSCP514:** These BSCPs would be modified to include obligations on Meter Operators and Data Collectors to make use of the new flow alongside the D0150 in cases where advanced meters are fitted. New appendices will be created explaining the exact circumstances where the flow must be used, and these will be cross-referenced from the relevant steps in the interface timetables.

[10] Note that the RCAMY Meter Type is being added by DTC CP3308 as part of the November 2010 release.

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- **BSCP515[11]:** A minor change is required to reference the use of the new flow when MOAs send meter technical details to LDSOs for new installations. The detailed requirements for the sender (the MOA) would remain in BSCP514.
- **BSCP537 Appendix 1 (Self Assessment Document) and Appendix 2 (Testing Requirements):** References to the new flow would be included in the qualification testing requirements for Suppliers, NHHMOAs and NHHDCs, ensuring that new entrants are capable of using the flow or handling the data within it.
- **SVA Data Catalogue (Volume 1 & 2):** The Catalogue would be amended to include the new flow in the index and include references to BSCP504 and BSCP514 along with the relevant from/to instances.
- **Market Domain Data:** Add identifiers for Communications Providers into MDD. This would be achieved by raising an MDD Change Request against MDD Entity 21 (Market Role) and then assigning this role to participants added through MDD Entity 1 (Market Participant). No changes to the MDD system itself should be necessary.

3 Intended Benefits

3.1 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. The data flow goes further than the interim solution in that it provides details of a meter's data storage configuration in order to ensure that when carrying out remote reads, information is collected from the correct registers.

3.2 Including the flow in the BSCPs will mandate its use by Meter Operators and Data Collectors, ensuring a consistent approach is followed by all participants.

3.3 The creation of a new Communications Provider role in MDD will ensure that the market has a robust central source for this data, ensuring each Metering System's communications provider[12] can be identified accurately.

4 Industry Views

4.1 We received 16 responses to CPC00681. Of these 11 agreed, 3 disagreed and 2 were neutral

4.2 The respondents who supported the change believed that it aligned with the MRA change and reduced interoperability issues.

4.3 Some of the respondents who disagreed with CP1335 believed that the new data flow should not be issued to Distributors because they do not require or use the information, and that Meter Operator Agents (MOA) should be responsible for backfilling of data for all Metering Systems impacted by the Dxxx flow.

4.4 We agree with the respondents and recommend that the following changes be made to the redlining in order to reflect these concerns:

[11] Following industry impact assessment responses for CPC00681, BSCP515 is no longer impacted by CP1335. Please see point 4.4 below.
[12] The unique market-wide reference for a provider of network communications equipment i.e. the company who is providing the communications infrastructure to allow data to be collected remotely from an AMR meter.

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- Remove all references to distributors receiving the new Dxxx flow. Distributors would not use or require the information contained within the Dxxx flow and it would therefore not be beneficial to submit the new flow to distributors. This means that there would be no changes necessary to BSCP515.

- Amend the redlining within BSCP514 to ensure that MOAs backfill data for all Metering Systems impacted by the new flow. We suggest amending the redlining within section 9.3 as following:

  (original redlining) - the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.

  (Proposed addition to redlining) The NHHMOA shall be responsible for backfilling data for all Metering Systems impacted by the Dxxx flow.

4.5 The respondents, who disagreed with CP1335, because of the above reasons, supported these changes and are now in agreement with the proposed changes.

4.6 Another respondent did not agree with CP1335 because they were not supportive of the MRA change.

5 Impacts and Costs

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	8 days, equivalent to £1,980	February release suitable
Industry IA respondents	**Suppliers** – Systems Impacts identified **BSC Party Agents –** System and Process Changes identified **Distributors** – No impact	The majority of respondents believed that the February Release was suitable

5.1 A respondent highlighted that they would not be able to make the February release because they were currently upgrading their systems. They suggested that a June release would be more achievable.

5.2 Another respondent believed that this would result in a significant change to their customer and MOP systems. The respondent believed that it would take 12-15 months to implement the change.

6 Implementation Approach

6.1 We propose that CP1335 is included in the February 2011 Release, because this will align with the MRA change and the majority of respondents can meet this implementation timescale.

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7 Recommendation

7.1 We recommend, based on increased transparency and majority industry support, that you:

- **AGREE** the suggested amendments to the redline text; and
- **APPROVE** CP1335 for implementation in the February 2011 Release.

Contact the Lead Analyst:
Stuart Holmes
ELEXON Change Management
T:020 7380 4135

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Appendix 1: CP1335 Detail of Industry Impact Assessment

Table 1: Industry Impact Assessment Summary for CP1335 – Creation of New Auxiliary Meter Technical Details Data flow

IA History CPC Number	CPC00681	Impacts	BSCP514,BSCP515,BSCP504		
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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IA History CPC Number	CPC00681	Impacts	BSCP514,BSCP515,BSCP504		
Organisation	**Capacity in which Organisation operates in**		**Agree?**	**Impacted?**	**Days needed to implement**
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

Table 2: Impact Assessment Responses[13]

Organisation	Agree?	Impacted?	Comments	ELEXON Response
MRASCo Ltd	Yes	Yes	**Agree change comment** - 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. **For which role is your organisation impacted?** MRASCO Ltd **Please state what the impact is** - This is the corresponding change to DTC CP 3310. **Would implementation in the proposed Release have an adverse impact on your organisation?** No. The Release date coincides with the DTC and WPPS changes.	-

[13] Please note that we have only included responses in this table where the respondent provided additional information.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
Spark Energy	Neutral	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is -** unsure but because of need for MTDS and with the implementation / installation of Smart Metering will need further information to assess properly. **Would implementation in the proposed Release have an adverse impact on your organisation?** Possibly unknown fully at this time. **Associated costs:** Unknown at this time.	-
TMA Data Management Ltd	Yes	Yes	**For which role is your organisation impacted?** NHHDC **Please state what the impact is** - System and Procedure impact **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs** - Cost would be high	-
Western Power Distribution	Agree in principle subject to a couple of points below.	Yes	**Agree change comment:** 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. 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. **For which role is your organisation impacted?** Distribution MOA	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text. We recommend that the following (please see red text below) be included as part of the original redline text within BSCP514, section 9.3: **the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a**

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Please state what the impact is: 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. MOA – System changes will be required. **Would implementation in the proposed Release have an adverse impact on your organisation?** No	**D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.** The NHHMOA shall be responsible for backfilling data for all Metering Systems impacted by the Dxxx flow.
EDF Energy Networks	Yes	Yes	**For which role is your organisation impacted?** Networks/Distribution **Please state what the impact is -** Updating our systems to get it to recognise and load this new flow alongside the D0150 **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs** - we are unable to give details of associated costs at this time	-
E.ON	No	Yes	**Agree change comment** - We were not supportive of the associated change under the MRA DTC CP3310 **For which role is your organisation impacted?** Supplier, NHHDC and HHDC **Please state what the impact is -** Changes to Supplier and DC systems **Please explain the lead time** - As ELEXON are aware we are currently upgrading some of our systems therefore an implementation date of June 2011 or beyond would be beneficial. **Would implementation in the proposed Release have an adverse impact on your organisation?** 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. **Associated costs** – not available	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
Electricity North West Limited	No	Yes/No	**Agree change comment** - 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. **Any other comments** - 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?	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text.
EDF Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier, NHHDC and NHH MOP **Please state what the impact is -** System and process changes are required **Please explain the lead time** - 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. **Would implementation in the proposed Release have an adverse impact on your organisation?** No – release date for this change already known about. **Associated costs** – not known	-
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	**Agree change comment** - 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. 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	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text. We recommend that the following (please see red text

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			clearly highlights that the flow should not be sent to the LDSO. 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. If these changes are made or accommodated then we would have no hesitation in supporting the CP. **For which role is your organisation impacted?** LDSO, Supplier, MOA, NHHDC **Please state what the impact is -** There will be both system and process changes required. **Please explain the lead time** - We support the Feb 2011 implementation date. **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Any other comments** - 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.	below) be included as part of the original redline text within BSCP514, section 9.3: **the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.** The NHHMOA shall be responsible for backfilling data for all Metering Systems impacted by the Dxxx flow.
British Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is -** Update to processes **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-
E.ON UK Energy Services Limited	Neutral	Yes	**Agree change comment** - 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	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			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. **For which role is your organisation impacted?** MOA & NHHDC **Please state what the impact is -** Development of system updates and associated procedures. **Please explain the lead time** - We are highly (with others) dependent on the development of an appropriate solution by an external provider over whom we have little direct control. **Would implementation in the proposed Release have an adverse impact on your organisation?** We will incur significant costs for little perceived benefit	
British Gas	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is** - System changes to process new flow **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-
IMServ	Yes	Yes	**For which role is your organisation impacted?** MOA, NHHDC **Please state what the impact is** - Sending and processing of new flow **Would implementation in the proposed Release have an adverse impact on your organisation?** Potentially, however the new flow itself has already been approved and therefore we already have knowledge of the changes being made.	-
Scottish & Southern Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier, Party Agents **Please state what the impact is** - This is a significant change to our systems and processes.	**-**

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Please explain the lead time - 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. **Would implementation in the proposed Release have an adverse impact on your organisation?** We may not be compliant. See our response above. **Associated costs** - We estimate significant costs to make the necessary changes to our systems and processes. **Any other comments** - 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.	
NPower Limited	Yes	Yes	**For which role is your organisation impacted?** Suppler and Supplier Agents **Please state what the impact is** - Impact on systems and processes. **Would implementation in the proposed Release have an adverse impact on your organisation?** 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. **Associated costs** - Costs are unknown at this time. **Any other comments** - No	-
Bglobal Metering	Yes	Yes	**For which role is your organisation impacted?** NHHDC & NHHMO **Please state what the impact is** - 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	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			in the field to back-fill the NHHMO and NHHDC systems with this information. **Associated costs** - at this time the costs and timescales for such development have not been fully assessed but will run into £10,000s.	

We did not receive any comments on the redline text.

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Appendix 3: New Draft Change Proposals and Change Proposals

DCP/ CP	CVA/ SVA	Title	Description	Raised
CP1336	SVA	UMSO Adjustment of EACs and Pseudo HH Units based on Physical Audit Findings	The Proposer believes the settlement of electricity is entirely dependent on the accuracy and veracity of customer's inventory submissions, which can be inaccurate and updates aren't always readily provided. This CP would introduce a technique to correct Settlement for UMS consumption promptly, by using the physical audit results to address the difference between the Estimated Annual Consumption and actual consumptions.	02/07/2010
CP1337	SVA/ CVA	Improvements to the BSC Trading Disputes Process	This CP progresses three of the 12 changes recommended by the TDC following a review of the Trading Dispute Process in 2009 The three changes are: • increasing the Disputer Materiality Threshold of a Trading Query/Dispute; • clarifying what an 'affected party' is; and • include the need for the raising Party to indicate whether they are claiming exceptional circumstances and provide supporting evidence.	02/07/2010
CP1338	SVA	Guidance for Complex Sites - Network Flows affecting Settlement Meter Readings	This CP is proposing that extra guidance is added into BSCP502 and BSCP514 in the form of two additional examples of complex sites where Network flows affect Settlement Meter Readings.	02/07/2010

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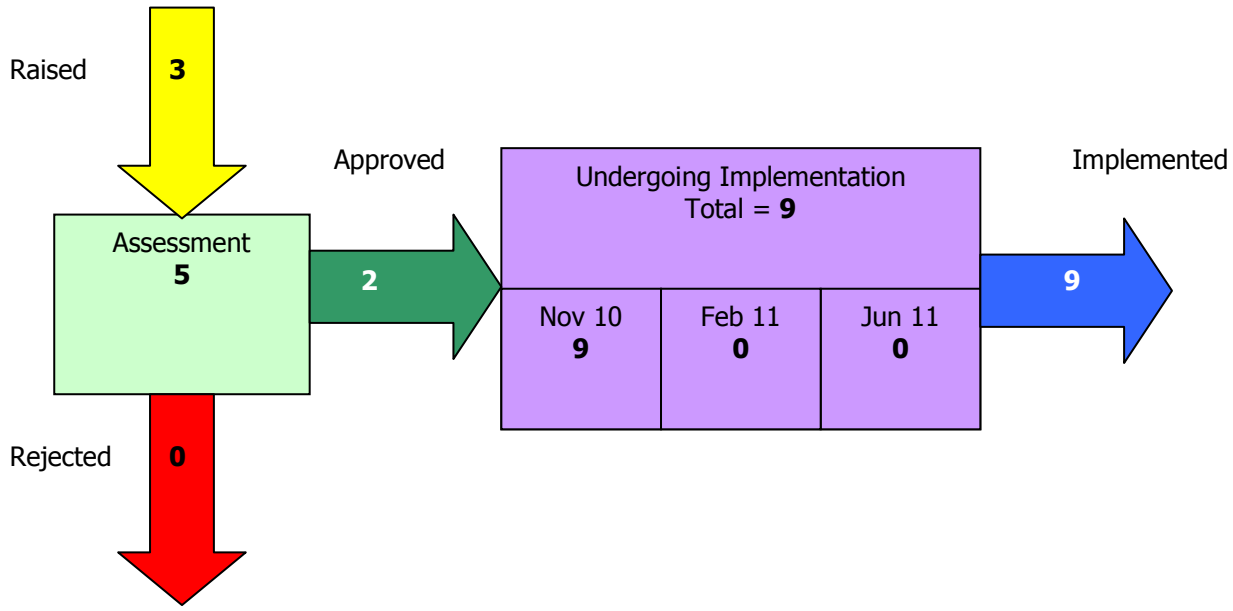
Appendix 4: Summary of Open Change Proposals

There are currently **9** open CPs, the ISG owns **1** CP, the ISG and SVG co-own **5** CPs, and the SVG own the remaining **3** CPs. **3** new CPs have been raised since the last ISG meeting.



Please note:

- The numbers in the boxes indicate current number of CPs in a given phase.
- The numbers in arrows show the variance in the past month.

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Appendix 5: BSC Releases

Change Proposals and Modification Proposals in **BLACK** text represents SVA changes, **RED** text represents CVA changes and **BLUE** text represents changes which impact both the SVA and CVA arrangements.

Key
P = Modification Proposal number
Pro✓/Pro× - Indicates that the Panel's recommendation to the Authority was to Approve/Reject the proposed Modification
Alt✓/Alt× - Indicates that the Panel's recommendation to the Authority was to Approve/Reject the Alternative Modification

	Pending CPs and Modifications	Approved CPs and Modifications	Updates
June 2010 Scope (Imp. Date 24 Jun 10)		**1309, 1311*, 1316, 1317, 1318, 1323, 1324, 1326, 1332**	The final scope of the June 2010 Release included nine approved CPs and no Modifications. . The Release was implemented on schedule on 24 June 2010.
Nov 2010 Scope (Imp. Date 4 Nov 10)	**1337**	**1267, 1315, 1325**, 1327, 1328, 1329, 1330, 1331, 1333** P243 Alt✓, P244 Alt✓	The scope of the November 10 Release contains two Modifications and nine Change Proposals. P243 'Publication of Generator Forward Availability by Fuel Type' and P244 'Provision of BritNed Data to BMRS' were both approved on 21 January 2010 for inclusion in the Release. Both the Application Management and Development (AMD) and Business Process Operator (BPO) service providers have commenced work on the Release and are progressing to plan. One CP, which impacts PARMS software, will be implemented on 1 November 2010. Changes to Code Subsidiary Documents also impacted by this CP will become effective on this date. All other changes will be implemented on 4 November 2010.
Feb 2011 Scope (Imp. Date 24 Feb 11)	**1334, 1335, 1336, 1338**		No CPs or Modifications have been approved for the Feb 11 Release yet.
Standalone Releases	P229 Pro×/Alt×	P255 Pro ✓/Alt×	

* Changes to BSCP504 as a result of the CP1311 solution have been implemented in the June 10 Release. All other changes resulting from CP1311 were implemented in the February 10 Release.

** CP1325 has been approved to be implemented on the 1 November 2010, but is included in the November 10 Release.

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