

CPC00594 Impact Assessment Responses for CP1178, CP1181 CP1182, CP1183,
CP1184, CP1185 and CP1186

CP1178

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Impact: No Implementation Notification Required: 0 days
UUNL & NORW NHH MOA	-	-	Not Applicable Impact: No
United Utilities (NORW HH & NHH MOA)	-	-	Not Applicable Reason: No impact as this CP should affect Suppliers only. Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree
E.ON UK Energy Services Limited	-	-	Neutral Comment: These changes will have no direct impact on our systems & processes
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG)	✓		Agree Impact: Yes

Carried out by	Agree	Disagree	Comments
Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited			
EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)	-	-	Neutral Comment: EDF Energy Networks are not affected by this change proposal as a LDSO Impact: No
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		Agree Comments: While ScottishPower does not oppose this change we would question the validity of such a high volume of negative EAC's. Negative EAC's should be the exception suggesting instances of negatives outweighing positive EAC's to be highly irregular. Perhaps the CP could be amended to reflect an investigation of the data before blindly submitting into PARMS. Impact: No Implementation Notification Required: 0 days
Centrica	-	-	Neutral Comment: Centrica do not believe based on the information provided within the CP1178 that there is any impact. Impact: No Comment: Centrica do not believe based on the information provided within the CP1178 that there is any impact.

Carried out by	Agree	Disagree	Comments
			Implementation Notification Required: Standard release notification by Elexon
Siemens Energy Services	-	-	Neutral Impact: No
United Utilities	-	-	Not Applicable
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd		✓	Disagree Reason: Negative EACs are false and should not be used in Settlements as they artificially inflate performance. We disagree with CP1178 as it stands and require clarity on the impact on SP08 and recommend a working group takes place to discuss the changes to the SP08 validation rules in PARMS in further detail. Impact: No Implementation Notification Required: 0 days

CP1181

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Impact: No Implementation Notification Required: 0 days
UUNL & NORW NHH MOA	✓		Agree Comment: SVA Catalogue not referred to in Business Environment Impact: No
United Utilities (NORW HH & NHH MOA)	✓		Agree Comment: The SVA catalogue is not used within our business. The DTC is used as our reference manual and is the preferred option. Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree Comment: It seems sensible to have a 'one industry' view but we need to ensure that Settlement requirements will be met under the MRA. When Appendix E (Acronyms) is removed, we would like to see it stated within the SVA Data Catalogue as to where the definitions of the acronyms can be found.
IMServ Europe Ltd	✓		Agree Impact: No

Carried out by	Agree	Disagree	Comments
			Implementation Notification Required: 0 days
E.ON UK Energy Services Limited	✓		Agree Comment: This change will simplify current arrangements Impact: No
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited	✓		Agree Impact: No
Western Power Distribution	✓		Agree Impact: No Implementation Notification Required: 0 days
EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)	✓		Agree Comment: EDF Energy Networks supports this CP as we believe it is sensible to remove the duplication between the SVA Data Catalogue and the DTC. Impact: No Comment: This will have minimal impact upon our organisation Implementation Notification Required: 0 days
ScottishPower Energy Management Ltd.	✓		Agree Comment: ScottishPower supports this CP believing it will lead to a more

Carried out by	Agree	Disagree	Comments
ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.			streamlined and efficient version of use governance documents in relation to data items. Impact: No Implementation Notification Required: 0 days
Centrica	✓		Agree Comment: There is no impact at Centrica and should reduce the level of change as changes to the DTC will not need to be reflected in the SVA catalogue. Impact: No Implementation Notification Required: Standard release notification by Elexon
Siemens Energy Services	-	-	Neutral Impact: No
United Utilities	✓		Agree Comment: Slight impact, but I think most of us use DTC not SVA catalogue anyway
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd	-	-	Neutral Impact: Yes Comment: Minor system and processes changes would need to be actioned. Implementation Notification Required: 90 days

CP1182

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		✓	Disagree Reason: Why aren't generators included? If this Service Line is for all Parties/Party Agents then it is logical for generators to be included. Impact: Yes Implementation Notification Required: 10 days
UUNL & NORW NHH MOA	✓		Agree Impact: No
United Utilities (NORW HH & NHH MOA)	✓		Agree Comment: This will be beneficial as only one document will need to be referred to which will make it easier to find information required. Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree Comment: We are in support of this initiative but need to ensure that the new PSL is not watered down in any way and that all obligations on Party Agents are carried over correctly. We note there are some non-functional items not being transferred to the new PSL and these need to be included in the relevant BSCPs.
IMServ Europe Ltd	✓		Agree Impact: Yes Comment: Only in terms of a review of the amended documentation.

Carried out by	Agree	Disagree	Comments
			Implementation Notification Required: 0 days
E.ON UK Energy Services Limited	✓		<p>Agree</p> <p>Comments: Service provision requirements as reflected in the PARMs serials should be defined and recorded in an appropriate location potentially as an appendix to the generic PSL.</p> <p>Impact: No</p> <p>Implementation Notification Required Comment: We would recommend that the implementation should be "Big Bang" to remove the risks of operating two parallel systems</p>
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited	✓		<p>Agree</p> <p>Impact: No</p>
Western Power Distribution	✓		<p>Agree</p> <p>Comment: Agree in principle but see some specific comments below</p> <p>Impact: Yes</p> <p>Comment: Extension of obligations to LDSO and UMSO will require us to review our processes in these areas and may have impacts.</p> <p>Implementation Notification Required: 180days</p>

Carried out by	Agree	Disagree	Comments
			<p>Comment: We would need at least 6 months notice to be able to implement. Would suggest implementation of the new PSL in Nov '07 at the earliest.</p> <p>Other Comments:</p> <p>1.1.2 Small typo – add the word “by” after “to be undertaken”</p> <p>5.3.2 First bullet point is a bit woolly. Suggest it should just say “A documented security policy communicated throughout the market participant’s organisation to all employees.</p> <p>5.4.4 Does the last bullet point mean we should have a DR backup contract in place? Otherwise I am not sure what we are meant to be insuring against here.</p> <p>5.4.5 Our hardware is insured and our software is backed up for disaster recovery purposes. It is not normal to insure data, systems software and programs. Not sure what line development is.</p> <p>10.1.1 The term “in sufficient time” is a bit vague. I would prefer it to say “within the timescales defined in the BSC subsidiary documents”</p>
<p>EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)</p>	<p>✓</p>		<p>Agree</p> <p>Impact: No</p> <p>Implementation Notification Required: 0 days</p>
<p>ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.</p>	<p>✓</p>		<p>Agree</p> <p>Comment: ScottishPower supports this CP believing the creation of a generic PSL will lead to a more efficient use of time as all relevant requirements will reside in the one place as opposed to over a number of documents.</p> <p>Impact: No</p>

Carried out by	Agree	Disagree	Comments
SP Distribution Ltd.			Implementation Notification Required: 0 days
Centrica	✓		<p>Agree</p> <p>Comment: Centrica has no issues as long as the functional elements of the PSL's are added to the corresponding BSCP's as stated in CP1182</p> <p>Impact: Yes</p> <p>Comment: Yes to Processes as we will need to fully review and ensure like for like processes are transferred.</p> <p>Implementation Notification Required: Suggest 6 months release to enable Elexon and Industry to walk through new document.</p> <p>Other Comments: 3.4.2 BP1 We assume the removal of Magnetic ' so that it includes such things as CDs and DVDs?</p>
Siemens Energy Services	✓		<p>Agree</p> <p>Impact: No</p>
United Utilities	✓		<p>Agree</p> <p>Comment: A slight impact, but only in so far as we will all be looking at 1 document – should make it more streamlined and bring them all into line</p>
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Impact: Yes</p> <p>Comment: Minor changes to systems and work instructions would need to be actioned.</p> <p>Implementation Notification Required: 90 days</p>

Carried out by	Agree	Disagree	Comments
			Other Comments: Please note that due to shorter timescales for assessment over the Christmas period, we are still reviewing this CP and may have additional comments.

CP1183

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Impact: Yes Comment: Minor Impact Implementation Notification Required: 10 days
UUNL & NORW NHH MOA	-	-	Not Applicable Impact: No
United Utilities (NORW HH & NHH MOA)	✓		Agree Comment: I am concerned that this change does not solve the cause of the problem ie LDSOs failing to send D0139s upon change of energisation. A further concern is that I am unsure as to how effective the communication will be between Suppliers and HHMOAs and HHDCs when the supplier needs to instruct the HHMOA of change of energisation status. I still consider it would be more effective for the HHDC to send a D0001 to the supplier when polling data and in turn the supplier should then send a D0001 to the HHMOA, which would be the instruction from the supplier to the HHMOA change the energisation status. Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree Comment: We support this change as it will have a positive impact on HHMOAs and HHDCs as it makes sense to use an Energisation date based on HHDC data. One point we would like to see added to BSCP514 is what the process is for Suppliers instructing this deemed date to Agents, to avoid confusion.

Carried out by	Agree	Disagree	Comments
IMServ Europe Ltd	✓		Agree Impact: Yes Comment: Impact on operational processes Implementation Notification Required: 90 days
E.ON UK Energy Services Limited	✓		Agree Comment: This is a pragmatic solution to an established industry issue Impact: Yes Comment: Changes to LWPs
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited	✓		Agree Impact: Yes
Western Power Distribution	✓		Agree Impact: Yes Comment: Small process change Implementation Notification Required: 90 days
EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy	-	-	Neutral Comment: This change will have no impact on EDF Energy Networks systems

Carried out by	Agree	Disagree	Comments
Networks (SPN)			<p>or processes</p> <p>Impact: No</p> <p>Implementation Notification Required: 0 days</p>
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		<p>Agree</p> <p>Comment: SP support this change and are in agreement with allowing a date to be deemed for a change in Energisation Status of a Half Hourly Meter. However, the process should only be invoked as a last resort and not as matter of course.</p> <p>Impact: Yes</p> <p>Comment: This change will impact SP processes and a system change will be required for HHMOA.</p> <p>Implementation Notification required: 270 days</p> <p>Other Comments: We believe that a robust and auditable industry procedure is required. When a deemed or last dialled read is used guidelines must be established and made available re the process for passing these reads to the MO. Would the information be passed on via email, telephone calls or a flow?</p> <p>There is a possibility this process may cause problems for settlements for example when a deemed final read is provided prior to the disconnection taking place.</p> <p>Although we are supporting the change it is our belief that a more detailed solution is required to take into account the potential impact on settlements.</p>

Carried out by	Agree	Disagree	Comments
Centrica	✓		<p>Agree</p> <p>Comment: Centrica agree with the changes and will help resolve some difficult queries</p> <p>Impact: Yes</p> <p>Comment: There would be some impacts on the Processes</p> <p>Implementation Notification required: We suggest that the normal 6 month release time frame is used</p>
Siemens Energy Services	✓		<p>Agree</p> <p>Impact: Yes</p> <p>Comment: This CP would require process changes for our organisation.</p> <p>Implementation Notification Required: 90 days</p>
United Utilities	-	-	Not Applicable
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Impact: Yes</p> <p>Comment: Minor systems and processes changes would need to be actioned.</p> <p>Implementation Notification Required: 90 days</p> <p>Other Comments: We request that allowing a date to be deemed for a change in energisation status should also be considered for Non Half Hourly as it would help to resolve D0095 exceptions.</p>

CP1184

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Impact: No Implementation Notification Required: 0 days
UUNL & NORW NHH MOA	✓		Agree Comment: In practice this is the process by the LDSO and the procedure should reflect what is common practice Impact: No
United Utilities (NORW HH & NHH MOA)	✓		Agree Comment: This change will actually reflect current practice. However, LDSOs frequently disconnect, de-energise and remove meters at the time of disconnection and final meter readings are not provided if and when a D0139 is sent. Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree Comments: We support the proposal on the basis that this formalises an activity that for pragmatic reasons is undertaken already as indicated. It should be stated for the avoidance of doubt, that where the LDSO removes the meter (and hence de-energises the MPAN), it must endeavour to send Technical Details via D0150 to the MOA or by other means as agreed between the parties. Where the LDSO is unable to recover the meter but still disconnects (e.g. removing cable from a bricked up or boarded up property

Carried out by	Agree	Disagree	Comments
			<p>with meter still inside with little chance of recovery); this information should be conveyed to the MOA.</p> <p>The action referenced under 3.7.4 "Liaise with Meter Operator to agree arrangements for removal and recovery of meter" is rather vague. Tight time constraints, i.e. within 5 days of disconnection, must be placed on taking actions to ensure the MOA is aware of the meter removal to allow issue of the relevant D0150, D0010 in a timely manner.</p> <p>We also feel that the proposed solution should be extended to include in step 3.7.4 that the LDSO must provide the De-energisation information to the MOA as part of the process using a D0139. In the event of a short notice disconnection it is probably unlikely that the Supplier will have been involved and that in fact the demolition company will have liased directly with the LDSO. This step would ensure transmission of Final Reads for metering systems.</p> <p>There needs to be additional information for Half Hourly Meters that obligate the LDSO to contact the HHDC to arrange a final download of the metered data prior to disconnection.</p>
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact: No</p> <p>Implementation Notification Required: 0 days</p>
E.ON UK Energy Services Limited	✓		<p>Agree</p> <p>Comment: Whilst we would agree with this change a robust system will be required to ensure the communication of the final reads and facilitate the return of the removed assets in line with the MOCOPA requirements in this scenario.</p>

Carried out by	Agree	Disagree	Comments
			<p>Impact: No</p>
<p>E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited</p>	<p>✓</p>		<p>Agree</p> <p>Impact: Yes</p>
<p>Western Power Distribution</p>	<p>✓</p>		<p>Agree</p> <p>Comment: Typo in the Information Required section for 3.7.3 of the cp attachment. It should refer to BSCP501 not BSCP601</p> <p>Impact: No</p> <p>Comment: This would amend the BSCP in line with our actual current practice.</p> <p>Implementation Notification Required:</p> <p>Comment: The sooner this is implemented the better as it will remove a current audit issue.</p>
<p>EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)</p>	<p>✓</p>		<p>Agree</p> <p>Comment: We agree with the spirit and intent proposed in this CP. As on rare occasions the LDSO is requested to disconnect a Metering System at very short notice and there can be insufficient time for the de-energisation process to be followed before the supply is disconnected.</p> <p>Impact: Yes</p>

Carried out by	Agree	Disagree	Comments
			<p>Comment: Time to update internal processes and documentation</p> <p>Implementation Notification Required: 30 days</p>
<p>ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	<p>✓</p>		<p>Agree</p> <p>Comment: We agree with the principal of the CP as it seeks to reflect industry practice for occasions when an LDSO has to disconnect a Metering System which has not been de-energised. In terms of the detail we would like the comments noted in the section below to be taken into consideration.</p> <p>Impact: Yes</p> <p>Comment: This should be minimal change.</p> <p>Implementation Notification Required: 270 days</p> <p>Comment: At this time this change is expected to have minimal impact on ScottishPower systems. This will be confirmed through detailed Impact Assessment.</p> <p>Other Comments: Reference to Section 3.6 should remain to ensure its obligations are still adhered to. Proposed text could be ..Supplier will normally, in accordance with Section 3.6, instruct their Meter Operator....</p> <p>Remove "and ask for the Supplier to arrange for the removal (and recovery) of the meter" as it is questionable whether the Suppliers activities following the rejection of the disconnection should be prescribed in BSCP515.</p> <p>Step 3.7.5. Is it appropriate that an obligation placed on the MOA is included in BSCP515? It may be best to remove the obligation and include it in BSCP514 to ensure MOAs are made aware of it.</p>

Carried out by	Agree	Disagree	Comments
Centrica		✓	<p>Disagree</p> <p>Implementation Notification Required: As It the CP stands the proposed release date of June would be a challenge if you wanted to get this document working correctly.</p> <p>Other Comments: Centrica believe that the current format of CP1184 is a step forward in linking the ability of the DNO's and the MO's to have joined up process. However, we have concerns that if we change the wording to BSCP515 to permit LDSOs to disconnect an energised supply point, they will do so in cases other than emergencies.</p> <p>The proposed wording of BSCP515 is far too woolly and at the very least should be tailored to ensure that all relevant dataflows are included in the table - at the moment the following flows are excluded:</p> <ul style="list-style-type: none"> • D0139 (confirmation of energisation status from MOP) • D0125 (confirmation of disconnection from the Distribution), and • D0171 (confirmation of disconnection from MPAS) <p>We also suggest that in the event that the LDSO liaises with the MO it may be the case that the LDSO rather than the MO removes the meter. In that case the LDSO should send a D0010 (or D0002 if he could not read the meter) and D0150 to the MO in line with the process described in section 6.3.5 of BSCP514. The MO would then process these and advises the other parties as if he had removed the meter.</p> <p>Therefore we would not support the CP1184 in its current format but would</p>

Carried out by	Agree	Disagree	Comments
			strongly urge that SVG set up a working group to include DNO, DC, MO and Supplier to ensure we can put a process together that would satisfy the industry requirements.
Siemens Energy Services	✓		<p>Agree</p> <p>Comment: We are in support of this change overall, however we do have concerns over how the LDSO would communicate the disconnection details to the MOA. We would have a preference that this would be via an electronic method rather than telephone - this would also aid tracking of information for audits.</p> <p>We have a further concern regarding the recovery of the meter by the MOA. It would appear inevitable that there would be some time delay between the LDSO removing the meter and the MOA collecting it. During this time the disconnected meter would be left unsecured on a site, therefore creating a risk that the meter may be lost before the MOA is able to recover it.</p> <p>Impact: Yes Comment: This would have an impact on our processes rather than systems.</p> <p>Implementation Notification Required: 90 days</p>
United Utilities	✓		<p>Agree</p> <p>Comment: This is a problem for us at the moment and we have an outstanding audit issue because of it.</p>
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy		✓	<p>Disagree</p> <p>Reason: We are of the opinion that the LDSO should always follow the de-energisation process before the supply is disconnected.</p>

Carried out by	Agree	Disagree	Comments
Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd			Impact: No Implementation Notification Required: 0 days

CP1185

Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		✓	<p>Disagree Reason: In what circumstances would there be a change of SSC without an actual meter reading? A site visit would be required to change a timeswitch/teleswitch/meter/meter configuration. What is the materiality?</p> <p>Impact: Yes Comments: Significant system changes</p> <p>Implementation Notification Required: 12 Months</p>
UUNL & NORW NHH MOA	-	-	<p>Not Applicable</p> <p>Impact: No</p>
United Utilities (NORW HH & NHH MOA)	-	-	<p>Not Applicable</p> <p>Impact: No</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p>Agree Comment: On a change of SSC, the Supplier sends a D0052 Dataflow 'Affirmation of Metering System Settlement Details' to the Non Half-Hourly Data Collector (NHHDC). However, there are circumstances where the NHHDC would withhold readings until there is receipt of the D0052 Dataflow</p> <p>These situations could take '10 working days' to complete, and the risk is that if the D0052 Dataflow is not received until day 10 or Supplier is in receipt of a D0310 Dataflow 'Notification of failure to load or receive Metering system Settlement Details', then the reading that has been withheld by the NHHDC</p>

Carried out by	Agree	Disagree	Comments
			<p>would not be used/recognised until resolution is sought.</p> <p>It is suggested that the deeming process will still go ahead after '10 working days' even though there may be a reading with the NHHDC, therefore if this situation arose we would not want the deeming process to go ahead.</p> <p>Changes to SSC in terms of dataflows sent to the NHHDC are/should be sent from the MOA utilising D0150 D0149 and D0010 and therefore an actual read should be present in the D0010 (notwithstanding genuine invalid/faulty meter/register reads confirmed by MOA).</p> <p>Deeming should not be taken as an opportunity to amend SSC's in NHHDC without first ensuring MOA holds the same SSC configuration.</p>
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact: No</p> <p>Implementation Notification Required: 0 days</p>
E.ON UK Energy Services Limited	✓		<p>Agree</p> <p>Comment: This will bring the change of SSC into line with other Scenarios previously the subject of deemed reads.</p> <p>Impact: Yes</p> <p>Comment: Changes to LWPs</p>
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU	✓		<p>Agree</p> <p>Impact: Yes</p>

Carried out by	Agree	Disagree	Comments
Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited			
EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)	-	-	<p>Neutral</p> <p>Impact: No</p> <p>Implementation notification Required: 0 days</p>
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		<p>Agree</p> <p>Comment: This change will more accurately reflect industry practice and will also introduce greater consistency to BSCP504.</p> <p>Moreover, although few situations will arise where it is not actually possible to obtain a reading on a change of SSC, without other conditions being satisfied, the settlement processes currently do not allow for it at all (e.g. NHHDA does not permit an EAC to span a CoSSC). This change would, therefore, allow these downstream processes to operate without interruption.</p> <p>Impact: Yes</p> <p>Comment: System and process impact.</p> <p>Implementation Notification Required: 270 days</p>
Centrica	✓		<p>Agree</p> <p>Comment: Centrica fully support CP1185 and have made some additional comments below</p> <p>Impact: Yes</p> <p>Comment: Impact on Process</p>

Carried out by	Agree	Disagree	Comments
			<p>Implementation Notification Required: Standard 6 month release timetable from agreed SVG date</p> <p>Other Comments: It does seem that we are taking away some of the responsibility of the MOA to get actual final and initial reads when the SSC is changed. In the text below it gives 2 reasons why reads may not be available, faulty meter or meter no longer there.</p> <p>If the meter is no longer in place then the NHHDC would deem a final read anyway as the trigger for deeming would be the meter exchange.</p> <p>If the meter is faulty, then again a meter exchange would take place and the NHHDC would deem a final read under normal deeming rules. Both of these would be irrespective of whether there was a change of SSC.</p> <p>Where the NHHDC has been informed that the SSC has been changed but no valid actual readings have been provided to the NHHDC within 10 Working Days of the change and the NHHDC has not been informed that the readings are unavailable (i.e. the Meter is no longer in place or able to display a Meter register reading or the Meter is faulty and any reading displayed is known to be incorrect), and the NHHDC requires an initial / final Meter reading, the NHHDC shall request the reading from the MOA and also from the Supplier.</p> <p>If there is a change to the SSC but no meter exchange has taken place / the meter is not faulty then deeming should be allowed, however as previously mentioned, this could be open to abuse and some MOPs may just not bother to get a read when they reconfigure the meter. Agree in the document that the Initial should be the same as Final.</p>

Carried out by	Agree	Disagree	Comments
			<p>It seems that the text below is not wholly correct. If a meter has been exchanged and no initial read was gained, then this is non compliance on behalf of the MOP. They should have gained an initial read on meter exchange. If for whatever reason an initial is not gained then back deeming should be permitted after receipt of a minimum 2 reads and not 1 read that has been suggested.</p> <p>If the final Deemed Meter Reading cannot be used as the initial reading (i.e. where the Meter has been changed and the reading after the change is unlikely to be the same as the reading before the change), an initial Deemed Meter Reading may be calculated when either one or two new actual Meter register readings are obtained either in line with the reading cycle for that Metering System or obtained as special readings, provided that the first Meter reading is at least 10 Working Days after the NHHDC requested the actual Meter register reading from the Supplier and MOA and by 10 Working Days before the RF for the relevant Settlement Date.</p> <p>Also we noted that under 4.5.2 Para 1 - Need to cover Supplier providing CoSSC reading where the SSC was changed remotely on a prepayment meter.</p>
United Utilities	-	-	<p>Neutral Comment: We assume that we will receive deemed reads in these circumstances – will have to amend our mailbox and systems to accept new forms of flows – this should get picked up via an MRA change to the DTC</p>
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Impact: Yes Comment: Minor changes to systems and processes would need to be actioned.</p>

Carried out by	Agree	Disagree	Comments
			Implementation Notification Required: 90 days

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Carried out by	Agree	Disagree	Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Impact: No Implementation Notification Required: 0 days
UUNL & NORW NHH MOA	-	-	Not Applicable Impact: No
United Utilities (NORW HH & NHH MOA)	-	-	Not Applicable Impact: No
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree
E.ON UK Energy Services Limited		✓	Disagree Reason: We feel that the following areas should be included within the scope of the PRA Service Description to ensure the safe and efficient delivery of the service. <ul style="list-style-type: none">• Provisions to ensure that meters are fitted by an accredited MOP• Installation work should be carried out in accordance with the requirements of MOCOPA• Arrangements to ensure that there is no detrimental interaction between the Fiscal and Survey meters.

Carried out by	Agree	Disagree	Comments
			If these areas are addressed we would be able to agree the proposed changes.
E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AHGD) Limited, TXU Europe (AH Online) Limited, TXU Europe (AHST) Limited, Economy Power, Western Gas Limited, Enfield Energy Centre Limited	-	-	Neutral Impact: No
EDF Energy Networks (EPN), EDF Energy Networks (LPN), EDF Energy Networks (SPN)	-	-	Neutral Comment: No impact on EDF Energy Networks systems Impact: No Comment: No impact on EDF Energy Networks systems
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd. E-mail: ukelectricityspoc@saic.com Phone No: 01355 845 207	-	-	Neutral Comment: This will update the Service Description following the decisions taken by the Issue 21 Group and in line with the Panel's direction. Scottish Power agrees, then, that it is necessary for this document to be updated in accordance with this direction. Impact: No Implementation Notification Required: 0 days
Centrica			Comments: Specific questions: Will it mean that we have to install smart meters in some of our customers'

Carried out by	Agree	Disagree	Comments
			<p>premises (doc refers to the profile administrator installing and maintaining these devices)?</p> <p>How many are in the stratified sample (what volume would be the impact on us?)</p> <p>If data loggers are already used, then what is the benefit of replacing them with smart meters?</p> <p>Is this device a secondary asset, or is it that which will be used by the registered supplier for the purposes of measuring consumption and billing?</p> <p>How has the technology and service provision for these assets been selected? (Assuming that this asset will also be used by the registered supplier for measurement of consumption and billing), then how will access to the new devices be enabled by incumbent supplier and incoming suppliers at CoS? Will the asset meet the requirements of industry interoperability standards being developed by the ERA?</p>
Siemens Energy Services	-	-	<p>Neutral</p> <p>Impact: No</p>
United Utilities	-	-	Not Applicable
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Impact: No</p> <p>Implementation Notification Required: 0 days</p>