

CPC00583: Impact Assessment Responses for CP1164, CP1170 and CP1174

CP1164v2.0

Carried out by	Agree	Disagree	Comments
UUNL and Norw NHH MOP	✓		Agree
United Utilities I & C Solutions NORW HH MOP and NORW NHH (Complex)MOP	✓		Agree
United Utilities IMServ Europe Ltd	✓		<p>Agree</p> <p>Comment: This appears to provide a reasonable solution to a long standing issue.</p> <p>Impacted: Yes</p> <p>Impact comments: Work instructions and procedures need to be updated to reflect these changes and new process for meter exchanges. No impact on systems.</p> <p>Implementation Notification Required: 28 days</p> <p>Other comments: It is expected that the removal of section 4.2 (including the associated table providing a list of non-compliances) will reduce the number of category 1 non-compliances that are issued. There is potential for concern within the Industry that this change will enable the TAA to widen the scope of the audit however IMServ believes that should this situation occur, MOAs could address/resolve any such issues directly with ELEXON</p>

Carried out by	Agree	Disagree	Comments
			As the process covering the meter exchange scenario is not going to be put into BSCP27, the additional guidance document(s) mentioned in the CP is essential if the process is going to be transparent and work properly.
E.ON UK plc (SVA), Powergen Retail Ltd, Citigen (London) Ltd, Cottam Development Centre Ltd, Enizade Ltd, E.ON UK Drakelow Ltd, E.ON UK High Marnham Ltd, E.ON UK Ironbridge Ltd, Midlands Gas Ltd, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd	✓		<p>Agree</p> <p>Impacted: Yes</p> <p>Implementation Notification Required: 60 days</p> <p>Comments: To allow thorough testing to be completed prior to implementation date</p>
Association of Meter Operators	✓		<p>Agree</p> <p>Comments: The AMO support the changes envisaged by CP1164. The AMO will be interested to see (and review) the exact wording used to amend BSCP27. There is a slight concern that, to date, PAB meetings are confidential and held in a closed session are increasingly being used to decide upon non-company confidential industry issues which could be better dealt with within an open session. It may be more appropriate for PAB meetings to have a closed and open section of the meeting.</p>

Carried out by	Agree	Disagree	Comments
			<p>Impacted: Yes Comments: It will impact on the operational procedures of HHMOs Implementation Notification Required: No time notification given.</p>
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>Agree Impacted: No Implementation Notification Required: 0 days</p>
EDF Energy, Supplier Response	✓		<p>Agree Impacted: No Comments: None Implementation Notification Required: 0 days</p>
E.ON Energy Services Limited	✓		<p>Agree Comments: The changes will simplify processes and reduce the number of Non compliances identified</p> <p>Impacted: Yes Comments: Changes will impact procedures</p> <p>Implementation Notification Required: No time notification given.</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited,		✓	<p>Disagree Reason: We would, in part, support this CP which seeks to improve data quality and Technical Assurance. However, it is not clear that the concerns we raised earlier for CP1164v1.0 have been fully</p>

Carried out by	Agree	Disagree	Comments
<p>Npower Yorkshire Supply Limited, Npower Direct Limited</p>			<p>addressed in this revised version 2.0.</p> <p>We have no concerns with the proposed solutions to issues 2 and 3 and support these proposed changes.</p> <p>We do have concerns about the proposed solutions to issues 1 and 4.</p> <p>We would like to see further detail on the process for proposing, implementing and communicating change to the non-compliance sub categories. The use of myELEXON, allowing participants to be made aware of changes to documents on the BSC website, may not be a robust or pro-active enough process to facilitate this. We accept that currently the table in 4.2 of BSCP27 may restrict the TAA when issuing non-compliances however we have concerns that removing this table and including the information in a guidance note on the Elexon website does not provide sufficient visibility of any future changes made to the guidance note. We believe there is a need for Parties to be kept informed of changes to the sub-categories used and for them to be able to provide formal response to any proposed changes.</p> <p>We had also previously raised concerns that where MOA MTDs were not correct that the outcome should not be a 'note' but a non-compliance. The 'note' outcome for incorrect MOA MTDs is still shown in the MTD Provision and Validation Process diagram v2.0.</p> <p>This CP has tried to address too many separate changes and would have been better if a number of CPs had been raised addressing these issues. It would be disappointing if the solutions to 2 and 3 are not implemented because of the concerns raised with issues 1 and 4.</p>
<p>SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.</p>	<p>✓</p>		<p>Agree</p> <p>Comments: It is acknowledged, in terms of risk to Settlements and estimated cost savings, it would be sensible to focus on the MTDs provided by the HHDC and MOA. Notwithstanding this we would have found it beneficial if the CP had given an indication of the reasons why there are large numbers of non compliances raised due to data mismatches.</p>

Carried out by	Agree	Disagree	Comments
SP Distribution Ltd.			<p>Impacted: Yes Comments: Additional requests and provision of information from the MOA.</p> <p>Implementation Notification Required: 20 days</p>
<p>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, British Energy Generation (UK) Ltd, Eggborough Power Ltd</p>	✓		<p>Agree Comments: Agreed subject to satisfactory resolution of comments: <u>Proposed solution to Issue 1</u> The suggestion in Para. 2 that non-compliances in Data Collector MTDs are always “material” and “Cat. 1” is only valid if the MTD errors relate to primary settlement circuits. Where such errors relate to secondary circuits, they only have the “potential to affect settlement” and as such should be Cat. 2 non-compliances. <u>Attachment 1</u> The proposal to include this flow diagram as part of a guidance document on the Elexon website is agreed. However, for it to be of value to all BSC Parties, it should cover both CVA and SVA metering systems. Furthermore, as suggested by CP1164 text and Attachment 2, Registrants as well as Suppliers should have the option to submit MTDs to the TAA. As drawn, the “Meter Exchange” flow diagram is only valid for permanent primary meter exchanges. Separate clarification should be provided to cover secondary meter exchanges (e.g. while permanent (registered) meters are off-site for laboratory calibrations).</p> <p>Impacted: Yes Comments: A change to processes would be required.</p> <p>Implementation Notification Required: 60 days</p>
Siemens Energy Services	✓		<p>Agree Comments: We would support the revised version of this CP. However, please could clarification be provided on the diagram “Meter Exchange” from attachment 1 (MTD</p>

Carried out by	Agree	Disagree	Comments
			<p>Provision & Validation).</p> <p>The question 'Are the MTDs materially incorrect?' on the right side of the diagram has two outgoing flows labeled "No", which could lead to confusion and non compliances issued in error.</p> <p>We believe that the out going "No" pointing to the non-compliance Cat 2 may need to be removed.</p> <p>If the new details are correct and there is no materiality difference, they are the correct details for the metering found on site at the time of the audit, and the site is compliant as per the other outgoing "No" flow.</p> <p>Impact: Yes</p> <p>Comments: This would require process changes only.</p> <p>Implementation Notification Required: 90 days</p>

CP1170

Carried out by	Agree	Disagree	Comments
UUNL and Norw NHH MOP	✓		Agree
United Utilities I & C Solutions			
NORW HH MOP and NORW NHH (Complex)MOP	✓		Agree
United Utilities			
IMServ Europe Ltd	✓		<p>Agree</p> <p>Comments: Conditional agreement.</p> <p>Whilst we support the proposal in principle, our agreement is contingent upon clarification of the following points: -</p> <p>Question A) Section 3.5.2 – “The change can be amended by the Panel Committee providing that: -</p> <ol style="list-style-type: none">1) The amendment has been suggested during impact assessment.2) There is a unanimous verdict to amend the CP by the Panel Committee.3) There is no material impact on the solution” <p>We request that a definition be provided regarding the phrase “material impact”. We believe that by providing this opportunity to amend the wording of a change from that previously reviewed and commented upon by the Industry, there is the potential for the same situation to result as this current CP is seeking to avoid/resolve. For example: the wording of this particular section suggests that the decision taken by SVG in relation to CP1063 as part of the Feb 06 Release (to add an additional footnote) would still be permissible under the new process, however CP1063 was eventually withdrawn as a result of Industry reaction to the decision of SVG.</p> <p>We would also question as to whether it is appropriate that a Panel Committee member is involved in a discussion regarding a change to a CP in the instance that they/their</p>

Carried out by	Agree	Disagree	Comments
			<p>Company proposed the amendment in question. Question B) Panel Committee decisions. Is there an intention to publish the detail of the Panel Committee voting? Impacted: Yes Comments: This change would impact our processes however would not incur any additional effort or cost.</p>
<p>E.ON UK plc (SVA), Powergen Retail Ltd, Citigen (London) Ltd, Cottam Development Centre Ltd, Enizade Ltd, E.ON UK Drakelow Ltd, E.ON UK High Marnham Ltd, E.ON UK Ironbridge Ltd, Midlands Gas Ltd, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd</p>	✓		<p>Agree</p> <p>Impacted: Yes</p> <p>Implementation Notification Required: 10 days Other comments: We welcome the changes proposed in this CP and feel it will result in a more effective change process with clearly defined solutions therefore making industry more able to assess the implications of proposed solutions and respond accordingly. We see no objections to this change being implemented in the November release.</p>
<p>Association of Meter Operators</p>	—	—	<p>Neutral</p>
<p>Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish</p>		✓	<p>Disagree</p> <p>Reason: 3.4.9 - is this step needed? Why shouldn't the change go straight out in the next pack?</p>

Carried out by	Agree	Disagree	Comments
Hydro-Electric Power Distribution Ltd; Medway Power Ltd;			<p>3.5.2 - think change should be rejected (or accepted) and then left for the proposer/ party who raised the comment to decide whether to submit another change. If it is left as it is, who would you see as being the sponsor/proposer of the change.</p> <p>Impacted: Yes Implementation Notification Required: 7 days</p>
EDF Energy, Supplier Response	✓		<p>Agree</p> <p>Comments: We just have two comments on red-lined changes: Page 38 section 3.11.4 – we have assumed that these assessments will be via Change Proposal Circulars, but would like this to be stated for completeness. Form BSCP40/03 – has a mandatory section called “Requirement in the Code to which the CP relates”. However, not all CPs can be related directly to a section of the code. For example, if we wanted to change a PARMS serial there is no direct reference to these in the code, although section S does give an overview that monitoring will be carried out. In this case this particular part of form seems to be redundant but as it is mandatory something has to be filled in. We also have a mandatory section called “Impact on Core Industry Documents or System Operator-Transmission Owner Code” from section 3.2 there does not seem to be a specific action on BSSCo to ensure that such information is provided to originator in a form they will understand and without it a CP cannot be raised.</p> <p>Impacted: Yes Implementation Notification Required: 20 days</p>
E.ON Energy Services Limited	✓		<p>Agree</p> <p>Comments: The proposed changes will reduce confusion during the consultation on and implementation of CP.</p>

Carried out by	Agree	Disagree	Comments
			<p>Impacted: No Comments: This will not necessitate any changes to our activities</p>
<p>Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>	✓		<p>Agree</p> <p>Comments: Having raised this CP, we are fully in support of it. The availability of all relevant documentation and information at the point when a CP is distributed for impact assessment process allows all respondents to be confident in their decision-making and facilitates consistency of understanding across the industry. We believe that all participants in the Change Process will benefit from a sounder, unambiguous and more effective process should this CP be implemented.</p> <p>Impacted: No Comments: The implementation of this CP requires no system changes for our organisation.</p> <p>Other comments: We support the implementation of this CP in the February 2007 release.</p>
<p>SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>		✓	<p>Disagree</p> <p>Reason: Whilst we accept that elements of this proposal would serve to improve the clarity of CPs, particularly during the earlier stages of the process, we are concerned that they will also serve to elongate the process.</p> <p>We are also concerned that the establishment of discreet SVA and CVA standing expert groups is unnecessary. Rather, we are of the view that the many expert groups, already in existence under the auspices of the BSC (e.g. STAG, SAF, UMSUG etc.) should be able to cover the assessment of Issues and DCP as a part of the normal business of their regular meetings.</p>

Carried out by	Agree	Disagree	Comments
			<p>Impacted: Yes Comments: This will require some minor changes to the internal process for raising CPs.</p> <p>Implementation Notification Required: 20 days</p>
<p>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, British Energy Generation (UK) Ltd, Eggborough Power Ltd</p>		<p>✓</p>	<p>Disagree</p> <p>Reason: This would increase complexity, administration and bureaucracy for Elexon and parties, and create potential for conflict and confusion between different proposals, with limited benefit in our view. We consider all that is required to achieve same result is continued discipline in giving sufficient notice to affected parties of firm changes in arrangements.</p> <p>Impacted: Yes Comments: Internal change processes would need modification to match the central changes.</p> <p>Implementation Notification Required: 30 days Comments: Internal change processes would need modification to match the central changes.</p> <p>Other Comments:</p> <ul style="list-style-type: none"> • The CP has apparently been raised mainly as a result of SVA related issues. The same issues do not appear to have been a concern for CVA. Perhaps the problem lies with SVA parties and agents and not with the central arrangements or CVA parties. • Would lead to an ever increasing amount of consultation/attendance at WGs, and associated Elexon support. • Restricting the BSC Panel or its committees to strictly defined proposals raised by

Carried out by	Agree	Disagree	Comments
			<p>individual parties, rather than allowing some flexibility over solutions in consultation with other parties and the Panel/committees as at present would not obviously better meet the BSC Objectives.</p> <ul style="list-style-type: none"> • There seems to be an overlap between the proposed draft CP and “BSC Issues”. It would be less complex to use just one of these concepts which allows a CP without a clearly defined solution to be considered by a WG /industry (as happens with issues for BSC mods).
Siemens Energy Services	✓		<p>Agree</p> <p>Comments: We strongly support the changes proposed in CP1170. In the past we have been faced with lengthy delays before red lined versions of CSDs have become available. In some cases, because the timescales for implementing the change were quite tight, we have had to change systems design specifications after subsequent updates have been made to the proposed CSDs - this has caused confusion and increased costs. The proposed CP addresses this issue along with a number of others that we have identified with the change process. As an agent, It is essential for us to have of the information relating to a CP before being required to make changes to our systems and processes.</p> <p>Impact: No</p> <p>Implementation Notification Required: asap</p> <p>Other Comments: We would support this CP being implemented as soon as possible.</p>

CP1174

Carried out by	Agree	Disagree	Comments
UUNL and Norw NHH MOP	✓		Agree
United Utilities I & C Solutions			
IMServ Europe	✓		Agree Impacted: No
E.ON UK plc (SVA), Powergen Retail Ltd, Citigen (London) Ltd, Cottam Development Centre Ltd, Enizade Ltd, E.ON UK Drakelow Ltd, E.ON UK High Marnham Ltd, E.ON UK Ironbridge Ltd, Midlands Gas Ltd, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd	✓		Agree Impacted: Yes Implementation Notification Required: 60 days Comments: To allow thorough testing to be completed prior to implementation date. Other Comments: Although we support this CP we feel for points 1 and 2 it would be beneficial to use generic terms rather than adding in specific terminology which could change over time with new technology and therefore result in further CP's to update it.
Association of Meter Operators			Neutral
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd;	✓		Agree Impacted: No Implementation Notification Required: 0 days

Carried out by	Agree	Disagree	Comments
Medway Power Ltd;			
EDF Energy, Supplier Response	✓		<p>Agree</p> <p>Impacted: No Implementation Notification Required: 0 days</p>
E.ON Energy Services Limited	✓		<p>Agree</p> <p>Impacted: No Comments: This proposal is unlikely to impact our day to day activities.</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p>Agree</p> <p>Comments: We support this CP as we consider that improvements to meter testing and compliance will ensure more accurate data being used within the industry.</p> <p>Other Comments: We support the implementation of this CP in the next available release.</p>
<p>SAIC Ltd. Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.</p>	✓		<p>Agree</p> <p>Comments: The proposed changes to BSCP601 bring increased flexibility to the meter approval and testing process enabling it to better meet the needs of individual applications.</p> <p>Implementation Notification Required: 20 days</p>

Carried out by	Agree	Disagree	Comments
SP Distribution Ltd.			Other Comments: Sections 2.1.8 & 2.2.7 would be more accurate if it stated "Notify Applicant of test result determination".
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, British Energy Generation (UK) Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Comments: BE agrees with the proposed change subject to the resolution of the issues outlined below.</p> <p>Detailed comments:</p> <p><u>Issue 1</u> Although the Description of Problem states "There are no requirements.....for Meter Manufacturers to inform BSCCo of any software version updates that may affect settlement data", this important point is not resolved either under Proposed Solution(s) or in the amended text in CP1174 Attachment A.</p> <p><u>Issue 2</u> The resolution of Issue 2 appears to be covered by proposed changes to the "Generic Test Specification for CoPs 1, 2, 3 & 5" as detailed in CP1174 Attachment A. Why is there no reference to this document in BSCP601? In the proposed table to be added to the beginning of Section 5 of the above-referenced "Generic Test Specification" :</p> <ul style="list-style-type: none"> • BE consider BSCP601 Clause 5.1(c) applies to standalone outstations. The table should be updated to reflect this. • Can standalone meters store data as suggested against 5.11? If not, this should be deleted from the table. • Can standalone meters provide reverse running indication as suggested against 5.13.5? If not, this should be deleted from the table. <p><u>General</u> In addition to the "Generic Test Specification for CoPs 1, 2, 3 & 5" referred to above, the Elexon website also lists the following documents related to BSCP601 :</p> <ul style="list-style-type: none"> • BSCP601 Appendix 3.5 – Metering Equipment Type Testing to CoP6

Carried out by	Agree	Disagree	Comments
			<ul style="list-style-type: none"> • BSCP601 Appendix 3.8 – Metering Equipment Type Testing to CoP6 • BSCP601 Appendix 3.10 – Approval Testing of Metering Equipment Protocols <p>Assuming these are active documents, why are none of them referenced by BSCP601, and has any consideration been given to the impact on these documents of CP1174?</p> <p>Impacted: Yes Comments: Update of formal documentation.</p> <p>Implementation Notification Required: 30 days Comments: Update of formal documentation.</p>