

CPC00593 Impact Assessment Responses for CP1174v2.0, CP1177v2.0 and CP1180

CP1174 v2.0

Carried out by	Agree	Disagree	Comments
Centrica	–	–	<p>Neutral</p> <p>Comments: Centrica have no impacts and are not affected by the change.</p> <p>Impact: No</p> <p>Implementation Notification Required: None</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</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: This will have minimal impact.</p>
EDF Energy, Supplier Response	✓		<p>Agree</p>

Carried out by	Agree	Disagree	Comments
			<p>Impact on Organisation's Systems and/or Processes: 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. SP Distribution Ltd.</p>	✓		<p>Agree</p> <p>Comments: ScottishPower supports this CP for the following reasons :</p> <ul style="list-style-type: none"> • We believe it is sensible to include references to both software and firmware versions in BSCP601. • We believe it is correct to identify the test in the Generic Test Specification in terms of Meters, Outstations, or both Meters and Outstations. • The removal of the 'Table of Observations' from the Compliance and Protocol Approval Certificates is justified as the test results can clearly be identified as 'success' or 'failure' with no requirement for observations. • The removal of Panel approval steps makes the Compliance and Protocol Approval process more efficient. • The addition of Compliance test specifications to BSCP601 provides completeness and clarity. <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: This change will have an impact on ScottishPower processes.</p> <p>Implementation Notification Required: 270 Days</p>
<p>Siemens Energy Services</p>	-	-	<p>Neutral</p> <p>Impact on Organisation's Systems and/or Processes: No</p>

Carried out by	Agree	Disagree	Comments
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 on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 60 Days</p>
E.ON UK Energy Services Limited		✓	<p>Disagree</p> <p>Reason: We agree with the bulk of the proposed solutions however we cannot agree with the change in its current form. The areas that have generated concern for us are:</p> <ul style="list-style-type: none"> • Issue 3 - we disagree that the removal of the table of observations would be of benefit as the contents of the table are useful to the user and may have implications later on. • Issue 4 - we believe that Elexon should not be acting independently but rather as an agent of the panel. • Issue 5 - we feel that the incomplete Protocol Test Specification should not be removed rather it should be amended or replaced.
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Some review of existing test scripts will be required.</p>
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy	✓		<p>Agree</p> <p>Comments: Agree in principle, but subject to satisfactory resolution of</p>

Carried out by	Agree	Disagree	Comments
<p>Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd.</p>			<p>comments provided below.</p> <p>Impact on Organisation’s Systems and/or Processes: Yes</p> <p>Comments: Very minor impact on internal processes.</p> <p>Implementation Notification Required: 14 Days</p> <p>Comments: Time to update internal processes and documentation.</p> <p>Other Comments:</p> <p>References to Elexon should be replaced with BSCCo.</p> <p>1. <u>Issue 1</u> As previously stated against CPC00583, BE note that 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 still does not appear to be explicitly stated either under Proposed Solution(s) or in the amended text in CP1174 Attachment A. Please clarify.</p> <p>2. <u>Issue 5</u> The questions previously raised by BE regarding the absence of any references in BSCP601 to the related Specification for Compliance Testing or Appendices 3.5, 3.8 or 3.10 appear to be the subject of Issue 5 and the associated justification in CP1174 V2.00. However, BE cannot find any such references in the proposed changes to BSCP601 marked-up in Attachment A of CP1174 V2.00. Please clarify.</p> <p>3. <u>CP1174 V2.00 Attachment A – Proposed Changes to BSCP601</u></p>

Carried out by	Agree	Disagree	Comments
			<p>3.1 Clause 2.1.8 : The mark-up appear to show that the 'Panel Decision' under "Information Required" and 'Circular' under "Method" have been deleted against Parties, but nothing appears to have taken their place. Please clarify.</p> <p>3.2 Clause 2.1.8 : "Information Required" and "Method" appear to have been left blank against Party Agents. Please clarify.</p> <p>3.3 Clause 2.3.3 : The proposed "Action" text assumes that Approvals will stand. BE suggest this clause or another Section 2.3 clause should also cover the Action arising from failures to obtain fresh Approvals, particularly if any equipments have to be removed from the Approvals list as a consequence.</p> <p>4. <u>CP1174 V2.00 Attachment B – Specification for CoP 1, 2 & 3 Compliance Testing</u></p> <p>4.1 Title Sheet : "Protocal" should read "Protocol"</p> <p>4.2 Clause 4.4 Tables 1 & 2 : Although BE would expect the Type Approval test requirements specified here to be <u>the same or more onerous</u> than those specified against in-service Laboratory Calibration tests in Table 1 of CoP4, it appears the former are actually <u>less onerous</u> than the latter. Please either clarify the reason for this apparent reverse logic or confirm proposals to eliminate it.</p> <p>4.3 General : While this document is clearly related to BSCP601, the relationship is quite unclear. Currently it appears to be a standalone "Generic Test Specification" with no document ID on the cover, header or footer (other than on the Elexon website where it is described as an "Appendix" to BSCP601). However the mark-up submitted for review suggests it is no longer an Appendix, but new document Ref. BSCP601. Thus, there now seem to be 2 separate documents with the same ID. Please clarify.</p>

Carried out by	Agree	Disagree	Comments
Centrica		✓	<p>Disagree</p> <p>Reasons:</p> <ol style="list-style-type: none"> 1. We are of the view that the NHHDC should not amend the Profile Class data without the consent of the Supplier. As such, we support an amended version of the proposal whereby the NHHDC awaits consent from the Supplier before amending the Profile Class data, or at the very least notifies the Supplier of any changes that they have made to ensure an effective audit trail. 2. In addition to the above comments, the NHHDCs send us PC reports in a variety of formats and with a varied level of detail. Some show no workings as to how they came up with the change to the PC, which increases the pressure to accept / reject a proposed PC change within the relevant timescales. Centrica would have hoped that this CP would have sought to address these. <p>Impact: Yes</p> <p>Comments: To ensure we don't need to change our systems the process should remain that:</p> <ol style="list-style-type: none"> a) NHHDC tells Supplier that PC needs to change, b) Suppliers updates PC in his system - we would then send a D0205 from B-

Carried out by	Agree	Disagree	Comments
			<p>Smart to MPAS</p> <p>c) Supplier sends D0052 to DC - B-Smart sends D0052 once MPAS update has been accepted.</p> <p>d) DC updates site details</p> <p>Implementation Notification Required: 6 –12 months if we change the above</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier? <p>Answers:</p> <ol style="list-style-type: none"> 1. Centrica do support the CP in various areas and would accept an amended

Carried out by	Agree	Disagree	Comments
			<p>version as stated why we reject the CP.</p> <ol style="list-style-type: none"> 2. Change the When column of 3.2.1 to 'Six Monthly in May and November' to allow a Profile Class Review on a six monthly basis (rather than annually) with reviews held in May and November (as opposed to in February) in order to avoid contract round activity. It should be noted that LFs would still be calculated on an annual basis in accordance with BSCP516 Appendix 4.4. 3. If the DC assumes the Supplier has updated his records (Another new step would be added after 3.2.4 so that once the query period has elapsed, if no question has been raised by the Supplier, the NHHDC would enact the indicated Profile Class change.) then it is possible that if this has not happened then MPAS and therefore the DA will be out of sync with the DC. 4. The timescale for Suppliers to review the profile class changes should be lengthened from 3 Working Days to 20 Working Days. 5. Additional steps should be added to section 3.2 to introduce a query period to allow a Supplier to question an LF calculation performed by the NHHDC. 6. The NHHDC should be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes.
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy		✓	Disagree

Carried out by	Agree	Disagree	Comments
<p>Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;</p>			<p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Creating a twice yearly report instead of an annual one would create a small amount of work however, following up two reports a year would entail significant ongoing operational costs.</p> <p>Implementation Notification Required: 3 months</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier? <p>Answers:</p> <ol style="list-style-type: none"> 1. Disagree. We don't twice yearly reports will encourage/assist Suppliers to address these Profile Class Changes. A lot of experience has shown us that

Carried out by	Agree	Disagree	Comments
			<p>some sites have continually changing load factors due to season variations in their load profile.</p> <p>2. As long as the April and October contract rounds are avoided we have no preference to when the reviews are carried out.</p> <p>3. Disagree. The Profile Class is a Supplier owned component and impacts the calculation of supply charges. Therefore any changes are the responsibility of the Supplier</p>
<p>Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>		<p>✓</p>	<p>Disagree</p> <p>Reason: We are currently unable to agree to this change proposal as a whole, however we would like to make the following comments with regards to the 4 Proposed Solutions:-</p> <ol style="list-style-type: none"> 1. Disagree – we would rather keep the process as annually. 2. Agree that the timescale should be lengthened from 3 to 20 Working Days. 3. Agree that a query period should be added and that 20 Working Days is sensible to allow sufficient time for this. 4. Please refer to our comments below to question 3. <p>Impact on Organisation’s Systems and/or Processes: Yes</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would

Carried out by	Agree	Disagree	Comments
			<p>you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out.</p> <p>3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers:</p> <ol style="list-style-type: none"> 1. We would prefer to see the review to remain annually, enabling Suppliers sufficient time to fulfil their obligations and manage the process by completing it correctly first time. 2. As mentioned above, our preference is for the review to be carried out annually and during the month of February, as currently happens. 3. We strongly disagree with the proposed solution for the NHHDC to be driving the process because of the Supplier Hub principle where it is the Suppliers' responsibility for Agent performance, and this process should remain a Suppliers' obligation. Suppliers also have a better understanding of a Metering System's profile class. The change proposal does not provide process steps on how and when the Supplier would be informed of the updated Profile Class, and when the SMRS would be updated, should the NHHDC make a change to the Profile Class without waiting for the receipt of a D0052; these issues need clarification as they could lead to a potential increase in D0095's if the process is not policed.
EDF Energy, Supplier Response		✓	Disagree

Carried out by	Agree	Disagree	Comments
			<p>Reason: We can see merit in improving this process but feel that this change will give rise to more problems than it will resolve. We are not fully convinced that a six month review is required and would prefer further evidence on how this will help resolve these issues. If this is a process that Suppliers have has low priority then making it happen twice a year is not likely to resolve this situation. We are totally opposed to concept of NHHDC amending profile class without notification from Supplier. All this will do is lead to higher exception reporting.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: From a Supplier viewpoint process changes would be required to incorporate query process. From a NHHDC viewpoint no change would be required in order to be able to run the Profile Class report on a more frequent basis. However a new manually intensive process would be required if NHHDC were mandated to apply its own Profile Class updates.</p> <p>Implementation Notification Required: 90 Days</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would

Carried out by	Agree	Disagree	Comments
			<p>you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out.</p> <p>3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers:</p> <ol style="list-style-type: none"> 1. We are not convinced that a six-monthly review of the profile class is necessary. We feel that an annual review should be sufficient as a process to ensure that correct profile class is identified and updated. If, as is being suggested, Suppliers are not making the changes to profile class when they receive it once a year, as it is treated as low priority, then making this review twice a year is not going to help. Instead we need to focus on a process that would be considered as a higher priority for Suppliers. 2. From point of view as an NHHDC Agent it doesn't make much of a difference when the reviews take place as we have a pretty even workload across the year, however August would seem logical, allowing time for any changes to take place before the next "contract round". Therefore, if two reviews were considered as way forward February and August would be our choice. 3. We totally disagree with this aspect of CP 1177. There are so many issues with operating in this manner and here are the key ones that we have identified:

Carried out by	Agree	Disagree	Comments
			<p>Updating profile class in NHHDC systems will not make any difference to the way that data is aggregated in settlements. When aggregating data NHHDA will use the SMRS supplied profile class, from D0209, in generating the SPM. If Supplier has not updated this in SMRS then this consumption will produce an exception and this would then lead to estimates being entered leading to other issues for Suppliers. We believe that NHHDA may also use this profile class in determining whether an EAC/AA is potentially erroneously large or not on the extract scripts run against NHHDA, which would remove that part of the rationale for making the change.</p> <p>Updating the profile class in NHHDC systems alone will create significant numbers of E11 D0095 errors in the NHHDA databases for profile class mismatches. This will obscure Supplier's view of 'real' errors that are down to processing issues and will make these issues much less likely to be fixed.</p> <p>It is likely that to resolve such D0095 exceptions a Supplier could issue D0052s "correcting" NHHDC profile class back to the original profile class. This would negate any work carried out by NHDC and we do not think that this would assist in resolving these issues.</p> <p>There could be cases where it might not be possible to change a profile class without a corresponding change to SSC if PC/SSC combination is to remain valid. This would leave a NHHDC in an untenable position. They would be failing in their new responsibility to update profile class but would not have the authority to make</p>

Carried out by	Agree	Disagree	Comments
			<p>associated metering changes necessary to allow a profile class update to take place.</p> <p>With respect to CFS our NHHDC systems do not hold details relating to class average EACs that would in theory be applied to any Profile Class update. These default EACs may not be reflective of actual energy that is being used on an MPAN, which we already are aware of from our reading calculations. Using an EAC that is too low or too high will not only affect the accuracy of initial settlement runs but may cause readings to be passed erroneously as valid or invalid, which may affect not only settlements but customer billing.</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>Disagree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: This change will have an impact on ScottishPower systems and processes.</p> <p>Implementation Notification Required: 270 Days</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would

Carried out by	Agree	Disagree	Comments
			<p>you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out.</p> <p>3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers:</p> <p>1. ScottishPower does not support this change. If Elexon have identified the frequency of the report as an issue then why has it been increased? In addition, moving the report date to another month cannot be justified by comments that February is a 'busy time'. This provides a dangerous precedent where compliance could be viewed as incidental during periods of activity.</p> <p>Scottish Power and Dataserve have been able to produce and action this report successfully in the month of February, suggesting that this should also be possible for other Suppliers and Agent. By changing the process there is a cost implication from which I can see no cost benefit (to Scottish Power or the market in general).</p> <p>Scottish Power has the concern that some of the changes proposed will not tackle the root causes of why excessive EAC's and AA's enter Settlements. Through present Elexon reporting both Suppliers and NHHDC's are made aware of sites that are excessive and require a profile class change. The annual report is still required but increasing the frequency and changing the</p>

Carried out by	Agree	Disagree	Comments
			<p>run times will not improve the present view of excessive EAC/AA's to Suppliers.</p> <p>As such to have a greater chance of reducing excessive EAC/AA's stemming from incorrect profile classes we need to understand the real root causes. We suggest that differing forms of calculation of PC is an issue (PC calculation is based on LF calculation - MD and consumption, whereas Excessives are based only on consumption). We must also understand that a change of PC is likely to have an effect on the customers tariff. Although this is not a direct BSC consideration is impact the BSC process. Our experience suggests that these can be overcome with some concerted effort which may not be replicated with other Suppliers.</p> <p>Therefore it must be clear that these suggested changes will directly result in improved level of Excessive EAC/AA's, which unfortunately it is not.</p> <p>2. The case has not been made to change this from February and we would therefore advocate keeping the existing date. If it is demonstrated that there are issues with the February check, the sensible solution would be to move the annual review to May or November.</p> <p>3. CP1177 has the potential to have a negative impact on settlements rather than a positive impact as it does not include the supplier process to update the SMRS. If the NHHDC carries out the profile class update the SMRS (and as a result the PRS view in NHHDA) will be out of sync and any future D0019s will fail leading to an increase in D0023s & D0095s. This option completely undermines the Supplier Hub Principle and does not recognise that only the Supplier can update MPAS. If enacted every</p>

Carried out by	Agree	Disagree	Comments
			<p>affected metering system would have a D0095.</p> <p>We disagree that the NHHDCs should drive the process. The responsibility for the review should remain with the Supplier. There is more of an incentive placed on the Supplier as opposed to the NHHDC; therefore an improved process will have a better chance of success by responsibility remaining with the Supplier.</p>
Siemens Energy Services		✓	<p>Disagree</p> <p>Reason: SES have provided the following comments (in bold) for each of the proposed solutions:</p> <p>1) Change the When column of 3.2.1 to 'Six Monthly in May and November' to allow a Profile Class Review on a six monthly basis (rather than annually) with reviews held in May and November (as opposed to in February) in order to avoid contract round activity. It should be noted that LFs would still be calculated on an annual basis in accordance with BSCP516 Appendix 4.4. Agree this aspect of the change.</p> <p>2) The timescale for Suppliers to review the profile class changes should be lengthened from 3 Working Days to 20 Working Days. Agree this aspect of the change – 3 days seems a very short timescale for this process.</p> <p>3) Additional steps should be added to section 3.2 to introduce a query period to allow a Supplier to question an LF calculation performed by the NHHDC.</p>

Carried out by	Agree	Disagree	Comments
			<p>Agree this aspect of the change.</p> <p>4) The NHHDC should be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes.</p> <p>We would question the benefit that this change would bring. The electricity industry is a supplier hub driven industry therefore all changes to standing data should originate from supplier. There is already a robust and recently updated method of changing PC class in place (i.e. the D0052). There is also a rejection via flow process for the D0052 (D310), it is suggested that the D0052 / D0310 is should remain the only way of altering Profile class.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for

Carried out by	Agree	Disagree	Comments
			<p>each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers: 1 – Yes 2 – Yes, May & November 3 - No – as detailed above.</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>Disagree</p> <p>Reason: We cannot support this CP if the NHHDC drives the profile class change rather than the supplier.</p> <p>Impact on Organisation’s Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 60 Days</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out.

Carried out by	Agree	Disagree	Comments
			<p>3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers:</p> <ol style="list-style-type: none"> 1) We support the profile class review being moved to six monthly 2) May and November would be suitable dates from a supplier perspective 3) We feel the supplier should be driving this process and cannot support this CP if the NHHDC takes this over. Control needs to remain in one location to prevent a mismatch in data between supplier, MPAS and the DC <p>Other Comments:</p> <p>We feel that the format of the change of profile class report (P0206) needs to be amended to include the following as mandatory items:</p> <ul style="list-style-type: none"> • Supplier ID – if a supplier has several IDs then it would be useful from a control point of view to have this as a mandatory field • Profile Class ID (Current) - there has been instances where the NHHDC holds a different PC to that of the supplier. This mismatch will be reported via a D0095 but it would assist the validation process if the current PC held by the NHHDC was included. • Registration Effective from Settlement Date – this is a mandatory field on D0052 and D0205 so it is vital that the NHHDC includes this on the report. Suppliers may also require this to update their own

Carried out by	Agree	Disagree	Comments
			internal systems.
E.ON UK Energy Services Limited		✓	<p>Disagree</p> <p>Reason: Whilst we would Support changes 1, 2 & 3 we are unable to support change 4 as we believe that the responsibility for updating the profile class lies with the supplier and should remain with them, additionally there would be a potential increase in the number of D0095s and a new process would need to be developed to inform the supplier of any changes made to the profile class</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Additional data runs required & associated development of control mechanisms for the process</p> <p>Implementation Notification Required: 90 Days</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for

Carried out by	Agree	Disagree	Comments
			<p>each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>Answers:</p> <ol style="list-style-type: none"> 1. We would agree with this change as it would increase the industries ability to correct settlement data prior to RF 2. We would agree that May and November are appropriate times to conduct a review 3. Changes to the Profile Class for individual Metering Systems are and should remain the responsibility of the Supplier. The proposed change will potentially lead to an increase in the number of D0095s and would necessitate the development of new dataflow
AccuRead Ltd		✓	<p>Disagree</p> <p>Reason: AccuRead accept that changing the frequency and timing of the Profile Class Re-allocation is sensible however they do not agree that the NHHDC should update the Profile Class for any mpan without an explicit instruction from the supplier (ie a D0052). AccuRead believes that although this change will ensure the NHHDC has the new profile class it will lead to greater data inconsistencies in PC data between NHHDCs and Suppliers/SMRS. This in turn is likely to increase the number of D0095 E11 exceptions from NHHDCs. Point one of the proposed solution could be clarified to make it clear that although the carried out six monthly the calculation will look at one years data.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p>

Carried out by	Agree	Disagree	Comments
			<p>Implementation Notification Required: 182 Days</p> <p>Comments: 6 months notice would be required from the final approval of this changes as it would require a new type of process to be introduced</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier? <p>Answers:</p> <ol style="list-style-type: none"> 1) AccuRead believe either six-monthly or annually is acceptable. 2) For a NHHDC the timing is less important. 3) AccuRead believes that the supplier should continue to initiate the actual change of Profile class via DTC flow. Making the NHHDC responsible for making the changes is likely to increase data

Carried out by	Agree	Disagree	Comments
			<p>inconsistencies between NHHDCs and Suppliers and therefore SMRSs. This will particularly be a problem as there is not a flow from the NHHDC to the Supplier to confirm the Profile Class has been changed. Any increase in the inconsistencies between NHHDCs and SMRSs in Profile Class will lead to increased number of D0095 E11 errors in NHHDCs.</p> <p>AccuRead also feel this would be a major change from the current way Suppliers and NHHDCs interact. Currently for data items like Profile Class the supplier is the master/owner of the item so under the BSC and the concept of supplier hub management is responsible for updating all their agents of any changes. For this new process the NHHDC would be updating the data without the explicit instruction from the master/owner, in addition it is not proposed that any feedback/confirmation of the change is to be sent to the master/owner.</p> <p>Finally this lack of feedback will mean the supplier and therefore the SMRSs will not know the exact date the Profile Class will have been changed from, hence further data inconsistencies.</p> <p>Other Comments: If this CP was modified so it was still the Suppliers responsibility to initiate the actual change to the Profile Class via a DTC flow AccuRead would agree with this CP.</p>
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 90 Days</p>

Carried out by	Agree	Disagree	Comments
			<p>Questions:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out. 3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier? <p>Answers:</p> <ol style="list-style-type: none"> 1. Although generating the change of Profile Class report on a six monthly basis will mean increased workload for DCs, we agree that this is a positive move towards ensuring that MD metered sites are operating in the correct PC, thus reducing the impact that this issues has on Large EACAA measures, GUEE & SEAE. <p>Our only concern with this proposal is the prospect of sites with genuine erratic consumption i.e. water pumping stations will be flagged for a change of PC every six months. We believe that if PCs are changed on such a frequent basis the probability of D0095s (E11s) being generated as a result of data</p>

Carried out by	Agree	Disagree	Comments
			<p>inconstancy's is also increased.</p> <p>2. As NHHDC we do not have any major concerns about the timing of the report's, although December and January are probably best avoided</p> <p>3. If the NHHDC was to update the PC would it be the E11 that is used as the trigger to get the Supplier to update MPAS? If so is this wise as the D0095 process is currently under investigation to try to find out why the process is not working as it should?</p> <p>We do not agree with this proposal, as it has the potential for generating large volumes of material D0095s (E11s) which is a real threat to settlement, the process we are trying to protect. We believe that Suppliers must continue to update MPAS and NHHDC systems concurrently to avoid any unnecessary D0095s.</p>
<p>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd, Eggborough Power Ltd.</p>		<p>✓</p>	<p>Disagree</p> <p>Reason: BE disagree with point 4 as it undermines the Supplier Hub principle that the Supplier is responsible for its agents actions. Point 4 would remove the level of control that the Supplier has. The supplier is the primary point of contact with the customer and may have relevant information which is not available to the Data Collector.</p> <p>BE would like clarification of point 1 as it is not clear at the moment.</p> <p>BE are in agreement with points 2 (lengthening of timescales) and 3 (additional steps).</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: BEDL will need to develop processes to handle changes not</p>

Carried out by	Agree	Disagree	Comments
			<p>initiated by us. There could be potential system changes, depending on how DC's implement.</p> <p>Implementation Notification Required: 90 to 180 Days</p> <p>Comments: BEDL will need to develop processes to handle changes not initiated by us. There could be potential system changes, depending on how DC's implement.</p> <p>Questions and Answers:</p> <ol style="list-style-type: none"> 1. CP1177 v2.0 proposes to change the Profile Class review from annually to six monthly. Do you agree with this change? Please give reasons for your answer. <p>BEDL disagrees with this change. Further clarification is required as to whether the portfolio is to be reviewed as a whole six monthly or whether the portfolio is to be split. If the Profile Class review is to be changed to six monthly for the whole portfolio, then this would mean an increase in overall workload. Also, this may cause MPANs to flip-flop between classes depending on seasonal fluctuations. Although the tolerance band proposed is intended to prevent this flip-flopping, BEDL do not feel it is an adequate solution to the possible problem. If the portfolio is to be split, then BEDL feel that this is not practical as Supplier changes may occur between reviews.</p> <ol style="list-style-type: none"> 2. CP1177 v2.0 proposes that the Profile Class review occur in May and November (as opposed to annually in February)? Do you agree that May and November are the best times to conduct a review, or would you suggest a different time of year? If you would rather the Profile Class

Carried out by	Agree	Disagree	Comments
			<p>review be carried out annually please give your preference for when you want the annual Profile Class review to be carried out.</p> <p>BEDL would prefer the Profile Class review to continue to occur annually in February but with 20 working days rather than 3 working days allowed to review the Profile Class changes. There is little or no benefit for us in moving the review time.</p> <p>3. CP1177 v2.0 proposes that the Non Half Hourly Data Collector (NHHDC) be responsible for making changes to the Profile Class for each Metering System where it has identified that a change is necessary, as opposed to the NHHDC waiting for the Supplier to send a D0052 to make these changes. Do you agree that the NHHDC should be driving the process, or should it be the Supplier?</p> <p>BEDL strongly disagree with this proposal as it undermines the Supplier Hub principle as it stands where the Supplier is responsible for its agent's actions. Allowing the NHHDC to be responsible for making changes to the Profile Class would remove the Supplier level of control. This would also mean that the Supplier would not be able to disagree with the change of Profile Class. Currently it is the Supplier that notifies MPAS via a D0205 of any Profile Class change. There is no mechanism for the NHHDC to update MAPS and this will create an E11 industry exception (mismatch between DC and MPAS). This could materially affect Settlement by incorrect AA allocation across time periods.</p>
United Utilities	-	-	<p>Not Applicable Reason: No impact as organisation is a MOA.</p>

CP1180

Carried out by	Agree	Disagree	Comments
Centrica	✓		<p data-bbox="1104 402 1189 432">Agree</p> <p data-bbox="1104 475 1263 505">Comments:</p> <ol data-bbox="1104 515 2042 917" style="list-style-type: none"><li data-bbox="1104 515 2042 582">1. With regards to CP1180 - Confirmation of Metering status in the Non Half Hourly Market.<li data-bbox="1104 627 2042 730">2. Centrica are strongly supportive of this change as it will address the issues faced when we take on an MPAN where the metering was removed prior to our Supply Start Date.<li data-bbox="1104 775 2042 917">3. When a MOP does not send a D0150, the time and effort involved is high in determining whether there is either a meter present, but the MOP has forgotten to send the flow or no meter is present and they will not send the flows. <p data-bbox="1104 962 1585 992">Impact: No impact on Centrica systems</p> <p data-bbox="1104 1037 1346 1067">Other Comments:</p> <ol data-bbox="1104 1112 2042 1324" style="list-style-type: none"><li data-bbox="1104 1112 2042 1324">1. Proposed Solutions states: BSCP514 requires a new section to describe the NHH CoS processes where not linked to a coincident Change of Agent. Within that, process steps should be included to ask whether a meter is or is not installed and whether energised or not. I do not think the energisation status is relevant, D0150 always gets sent, D0149 gets sent if a meter is installed.

Carried out by	Agree	Disagree	Comments
			<p>2. Proposed Solutions states: It is worth noting that the existing process of responding to the initial request to the de-energise (D0134 'Request to Change Energisation Status') and remove all Meters (D0142 'Request for Installation or Change to a Metering System Functionality of the Removal of All Meters') will still be to send a D0139 'Confirmation or Rejection of Energisation Status Change' to confirm de-energisation and the D0150 containing the details of the removed Meters.</p> <p>3. This is incorrect Footnote 9 against section 6.3.3 (Removal of Meter) states that if de-energisation and removal occur at the same time then only the flows (D0150) associated with 6.3.3 are sent, therefore a D0139 will not be sent. We do not want this to change as this would impact on how we operate with our CMOs and therefore B-Smart JM.</p> <p>4. It would be sensible for BSCP504 and BSCP514 to be common in the combination of events they describe in the various sections.</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</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 6 months</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		✓	<p>Disagree</p> <p>Reason: Annex C of the DTC Rules already specify the procedures that should be followed for the population of a D0150 for the "No Meters Present" scenario, therefore where the Working Group "felt that this is not being done in many cases", it is the non-compliance of these parties that needs to be addressed. We have no objection to a statement being inserted into BSCP 514 to prescribe the sending of the D0150 in all cases; however any proposed amendments would need to ensure that they do not contradict with Annex C.</p>

Carried out by	Agree	Disagree	Comments
			<p>The CP proposes adding process steps to ask whether a meter is or is not installed, and whether energised or not. However, in Group 288 of the D0150, it is not sufficient to know that the Metering system is De-energised if the Supplier needs to match the EFSD (of de-energisation) with that of the NHHDC. As the MSMTDs will have changed at the date of meter removal, the Supplier needs the EFSD {MSMTD} to be populated with the date of meter removal or De-energisation if earlier.</p> <p>There is a scenario which also requires clarification, and this is where the MPAN does not hold MSMTD. This could be where the current MOA has not yet been requested to install/energise a meter for the first time and hence does not hold MSMTD. Where there is a subsequent CoS, there is no possibility for MOA to send the D0150 without MSMTD. Therefore the BSCP needs to address this and any required solution as this does not seem to have been considered by the Working Group.</p> <p>Another point is where a CoS D0150 holding the incorrect Energisation status of 'D', is then followed by the receipt of a D0010; this is a significant root cause of D0095s.</p>
EDF Energy, Supplier Response	✓		<p>Agree</p> <p>Comments: Where no meters are present it is necessary to let parties know that this is the case. Otherwise parties will waste time using other different mechanisms to request this data when they should have been informed that there is no metering on site. This could lead also lead to incorrect values being set for energisation status and potentially additional D0095 exception reporting from NHHDA.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p>

Carried out by	Agree	Disagree	Comments
			<p>Comments: This may require a small amount of system change but this will certainly require a change to business processes and therefore training will be required.</p> <p>Implementation Notification Required: 90 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>Agree</p> <p>Comments: ScottishPower supports this change as the addition of a new section to BSCP514 will result in Suppliers receiving accurate information regarding whether or not a meter is physically present at a site and also whether it is energised or not.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: ScottishPower processes and systems will require updating in order to implement this change.</p> <p>Implementation Notification Required: 270 Days</p> <p>Other Comments: Within the proposed solution we have been advised that a new section is required for BSCP514, but although we are given details of steps that should be included we are not given the actual wording of the proposed new section.</p>
<p>E.ON UK plc, Powergen Retail Limited, Citigen (London) Limited, Midlands</p>	✓		<p>Agree</p>

Carried out by	Agree	Disagree	Comments
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>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 60 Days</p>
E.ON UK Energy Services Limited	✓		<p>Agree</p> <p>Comments: We would support this change as it would highlight changes already noted in the DTC. It is unclear as to whether changes to the COA processes will be included in the scope of this CP. We would support the inclusion of the COA process as it would reduce the number of enquiries from suppliers to MOAs</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Changes to systems and processes will be required</p> <p>Implementation Notification Required: 180 Days</p>
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 160 Days</p>
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy	✓		<p>Agree</p> <p>Comments: BE agrees with the proposed change but comment that the limitation of the D0150 is that only the previous MOP can initiate it. For</p>

Carried out by	Agree	Disagree	Comments
Direct Ltd, Eggborough Power Ltd.			<p>example, a D0150 cannot be sent for a new connection as it would not have been metered before.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: Should be handled by existing BE issue resolution process.</p> <p>Implementation Notification Required: 14 Days</p> <p>Comments: Notice to update internal documentation</p>
United Utilities	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: IT system will need to be upgraded to ensure compliance which will involve factory appliance testing, user appliance testing, work processes to be updated and staff training.</p> <p>Implementation Notification Required: 6 months</p>