

## CPC00590 Impact Assessment Responses for CP1173 and CP1179

CP1173

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;	✓		<b>Agree Change</b>  <b>Impact:</b> No  <b>Implementation Notification Required:</b> 0 days
British Energy Power & Energy Trading, British Energy Direct Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd, Eggborough Power Ltd.	✓		<b>Agree Change</b>  <b>Impact:</b> No
IMServ Europe		✓	<b>Disagree Change</b>  <b>Comments:</b> As a HHDC we have not seen any evidence provided that suggests there has been any change in this situation.  This is not to suggest that there hasn't necessarily been a reduction across the industry of cases where proving test have not been requested, but that this information does not appear to have been collated or distributed by ELEXON.  Was this requirement not requested by ELEXON as part of the BSCP514 changes in order to monitor the proving test process?

			<p>Our own experience suggests that Suppliers may not use this report. In our role as a Meter Operator we do not receive such reports from other Data Collectors therefore any improvement seen internally has not been as a result of this process.</p> <p>In consideration of both this and the statement that monitoring is no longer required we propose that the requirement to produce this report should also be reconsidered.</p> <p><b>Impact:</b> Yes</p> <p><b>Implementation Notification Required:</b> 30 days</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p><b>Agree Change</b></p>
EDF Energy	✓		<p><b>Agree Change</b></p> <p><b>Impact:</b> No</p>
ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd.; ScottishPower Energy Retail Ltd. SP Manweb plc.; SP Transmission Ltd.; SP Distribution Ltd.	✓		<p><b>Agree Change</b></p> <p><b>Comments:</b> ScottishPower are supportive of this change as it removes the requirement for the Proving Test Out of Timescale Escalation Report. This requirement was introduced to support supplementary monitoring on the initiation of Proving Tests as a time when there were issue around this requirement. The situation has now improved and it is therefore sensible to eliminate the reporting the requirements from the appropriate BSCPs.</p>

			<p><b>Impact:</b> Yes</p> <p><b>Comments:</b> ScottishPower's processes will have to be updated to remove the requirement for the Proving Test Out of Timescale Escalation Report.</p> <p><b>Implementation Notice Required Comments:</b> ScottishPower would welcome this change being included in the earliest possible release.</p>
E.ON UK Energy Services Limited	✓		<p><b>Agree Change</b></p> <p><b>Comments:</b> This change will have a very limited impact on our activities as a HHDC.</p> <p><b>Impact:</b> Yes</p> <p><b>Comments:</b> Changes will be limited to minor changes within LWPs and the associated re-training of staff.</p>
Siemens Energy Services	✓		<p><b>Agree Change</b></p> <p><b>Impact:</b> Yes</p> <p><b>Implementation Notification Required:</b> 90 days</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,			<p><b>Agree Change</b></p> <p><b>Impact:</b> Yes</p> <p><b>Implementation Notification Required:</b> 60 days</p>

TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd			
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CP1179

Carried out by	Agree	Disagree	Comments
AccuRead Ltd	✓		<p><b>Agree Change</b></p> <p><b>Impact:</b> Yes</p> <p><b>Comments:</b> Minimal, production of a blank report.</p> <p><b>Implementation Notification Required:</b> 60 days</p> <p><b>Other Comments:</b> Though AccuRead agrees with the change CP1179 will bring about, it is unclear from the CP what will be used as a definition for which supplier we should send the report to. Unless informed otherwise AccuRead will send a copy of the report to every supplier that has mpan that is active on the reporting month.</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><b>Agree Change</b></p> <p><b>Impact:</b> No</p> <p><b>Implementation Notification Required:</b> 0 days</p>
British Energy Power & Energy Trading, British Energy Direct Ltd, British Energy Generation Ltd, British Energy Generation (UK) Ltd,	✓		<p><b>Agree Change</b></p> <p><b>Impact:</b> No</p>

Eggborough Power Ltd.			
IMServ Europe Ltd		✓	<p><b>Disagree Change</b></p> <p><b>Comment:</b> Where a supplier does not have any Metering Systems within PCs 5 – 8 are we still expected to send them a blank report? The Suppliers who do not work in these areas will know that they should not be expecting a report, sending a 'nil' report may just confuse.</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p><b>Agree Change</b></p> <p><b>Comment:</b> Potential increase of workload in reporting nil reports to all suppliers.</p> <p><b>Impact:</b> Yes</p> <p><b>Comments:</b> Enhancements required to existing scripts and reporting</p>
EDF Energy	✓		<p><b>Agree Change</b></p> <p><b>Comment:</b> We agree in principle with change that is being proposed. This would ensure that Suppliers are sure that they have received all 100kw reports that they expect and can action them appropriately. However updates to BSCP 504 will need to very clear about how Supplier who should receive a report from a NHHDC is to be identified to ensure consistency across all NHHDC Agents.</p> <p>A 100kw report should only be generated for MPANs for which a NHHDC is appointed at the time of running the report. As a NHHDC we would assume that 'nil' reports would only be generated for Suppliers for whom we have an active appointment at the time of running this report. However this needs to be clarified in BSCP to remove any ambiguity. It dos not seem to be appropriate to produce a report for every single Supplier in Market Domain</p>

			<p>Data if we have no contractual relationship.</p> <p>Whilst we agree with principle behind this change an alternate solution could be available. These reports could be provided by Elexon distributing reports to Suppliers in the same way that PARMS data is distributed. Elexon ensure that they receive reports from every NHHDC each month and passing this on to Suppliers could be an alternate approach.</p> <p><b>Impact:</b> Yes</p> <p><b>Comment:</b> NHHDC only – an additional process will be required to identify appropriate Suppliers and produce 'nil' reports for them, however it is not anticipated that this will require changes to our IT systems.</p> <p><b>Implementation Notification Required:</b> 30 days</p> <p><b>Comments:</b> NHHDC only – we would need this notice to ensure that appropriate changes to existing processes are in place before we are required to generate these new 'nil' reports.</p>
<p><b>ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd.; ScottishPower Energy Retail Ltd. SP Manweb plc.; SP Transmission Ltd.; SP Distribution Ltd.</b></p>	✓		<p><b>Agree Change</b></p> <p><b>Comments:</b> ScottishPower supports this change.</p> <p><b>Impact:</b> Yes</p> <p><b>Comments:</b> There will be minor changes to ScottishPower's systems and processes to allow for the change in timescales for producing / receiving reports.</p> <p><b>Other Comments:</b> As agreed with Elexon, ScottishPower intends to send an</p>

			email to the appropriate Supplier as a "NIL Report", indicating the Data Collector ID AND stating that there were no instances of a 100kW (or greater) demand.
<b>E.ON UK Energy Services Limited</b>		✓	<p><b>Disagree Change</b></p> <p><b>Comments:</b> The effect of this proposal is that the NHHDC would be required to send each month a report to every supplier that they have a relationship with including suppliers who have a severely limited number of MPANs associated with the NHHDC under JPW agreements. This would result in the NHHDC sending out a large number of null reports to those suppliers on a recurring basis. In order to address this issue one of two approaches can be adopted</p> <ul style="list-style-type: none"> <li>• Set a threshold (either in terms of number of MPANs or Total Energy) below which null reports are not required.</li> <li>• Rather than send a null report require the NHHDC to obtain confirmation of receipt of positive results.</li> </ul> <p>In summary we feel that this change would represent a large expenditure of resources for a very limited gain.</p> <p><b>Impact:</b> Yes</p> <p><b>Comments:</b> Requirement to send repeated null reports to all suppliers</p>
<b>Siemens Energy Services</b>	✓		<p><b>Agree Change</b></p> <p><b>Comments:</b> We would support this change. However, we would like to request if it would be possible for Elexon to provide a full distribution list for this report (and provide new contact details when new suppliers enter the market).</p>



			<p><b>Impact:</b> Yes</p> <p><b>Implementation Notification Required:</b> 90 days</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><b>Agree Change</b></p> <p><b>Comments:</b> We support a 'nil' report being sent where appropriate. However, one of this issues highlighted in the CP is incomplete reports being sent, we do not see how this issue has been resolved via this CP.</p> <p><b>Impact:</b> Yes</p> <p><b>Implementation Notification Required:</b> 60 days</p>