

CPC00633 – Impact Assessment Responses for DCP0031, DCP0032 and CP1245.

DCP0031 - Amendments to timescales and requirements of the BSCP515 processes to Disconnect, Energise and De-energise a SVA Metering System

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
British Energy	Supplier ; Trader; CVA MOA; Generator	✓
TMA	HHDC, HHDA, NHHDA	✓
ScottishPower	Supplier , Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	✓
RWE npower	Supplier , Supplier Agent	✓
Western Power Distribution	LDSO , Distributor	X
CE Electric UK (NEDL & YEDL)	LDSO	X
Central Networks	LDSO	X
Scottish and Southern Energy	Supplier , LDSO , Generator, Trader, Party Agent, Distributor	X
Association of Meter Operators	MOA	-
E.ON UK Energy Services Limited	NHHDC, NHHDA, HHDA, HHDC, MOA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
British Energy	✓	Agree: We are in full support of this DCP. It will improve the integrity of Settlements and provide much needed clarity. This DCP addresses the audit issue notified in CP1236 and we are of the opinion that DCP0031 should be progressed in preference of CP1236. Impact: Systems and processes changes.	✓	90
TMA	✓	-	X	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	Impact: Documentation Changes only	X	0
RWE npower	✓	<p>Agree: We support the principle of improving the clarity of the timescales in this process. However, we are of the opinion that further clarification of the methods by which the LDSO would communicate with the Supplier are needed to understand the extent of the impacts of this proposal on our organisation.</p> <p>Impact: Depending on the method chosen for the LDSO to notify the Supplier there could be impacts on our systems and/or processes to accommodate the receipt of communication and carry out any follow-up action required.</p> <p>Implementation: If system changes are required as a result of the red-lining we would need a minimum of 6 to 9 months to implement, depending on the scale of the change required.</p> <p>Other Comments: As stated above, we support the objective of improving communication and clarifying timescales and processes.</p> <p>There appears to be some duplication in the new steps proposed. If the job requested is going ahead on the date requested it might be superfluous to advise that it is going ahead. We would be more interested in knowing if the date had changed or if the LDSO was rejecting the appointment outright. We would also like to know, under what circumstances would the LDSO energise as a result of a direct request from a customer? We believe that this poses a risk and would expect that communication should be with the Supplier.</p>	-	-
Western Power Distribution	X	Disagree: The proposed changes to the energisation & de-energisation process need more work. For example the changes introduce requirements for new information flows but don't specify what DTC or P flows need to be sent. The change also fails to acknowledge the actual contractual relationship between Suppliers & LDSOs which is contained within the DCUSA. This contract does not require the LDSO to attend on	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>a specified date requested by the Supplier, only to attend within a reasonable time.</p> <p>The proposed changes to the disconnection process reveal a fundamental lack of understanding of the business process. LDSO does not simply turn up at a site and cut the cable to disconnect a supply; there are many additional steps in the process. The change does not recognise the fact that the physical disconnection of a supply is a matter between the LDSO and the end Customer. Suppliers may request disconnections but whether or not they actually happen, and when they happen, is not something that the Supplier has any control over. We do not accept the claim in the DCP that problems with the disconnection process should cause discrepancies in the number of MSIDs registered. Suppliers remain registered until they receive confirmation from MPAS that the MPAN has been disconnected. Provided they regard themselves as the registered Supplier until such time as they receive such confirmation there should be no discrepancies.</p> <p>In both cases it seems that the changes are more about managing site visits than ensuring the accuracy of settlement data. We do not believe The BSC is the appropriate document for this. Provided the LDSO sends the necessary flows within 5 working days of making a change to the energisation status, or 5 working days of disconnection, the accuracy of settlement should be ensured.</p> <p>Impact: Impact on Business Processes and systems.</p> <p>Implementation: Minimum of 6 months notice from agreement of red lined changes.</p> <p>Other Comments: Over the past few years there have been various workshops and change proposals dealing with issues in the areas of energisation status changes and disconnections. Despite this it seems that problems remain. From our perspective, whilst we do experience problems with these processes from time to time, they are not sufficient to warrant huge amounts of effort and costs to resolve.</p>		

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		If WPD is in the minority on this matter and other participants are having more problems than us then we would be happy to participate in a whole scale review of the processes. This should include identifying ALL problems encountered by the various market participants and, where there is agreement that an issue is significant enough to warrant it, fully exploring the possible solutions.		
CE Electric UK (NEDL & YEDL)	X	<p>Disagree: More specific points are featured in the table below however I have two points specifically about the wording in the 'description of problem/issue' and 'Justification for change':</p> <ul style="list-style-type: none"> • <i>"The proposed change clarifies that the LDSO may act as the result of a direct request from the customer associated with the Metering System, and add provisions to accommodate this"</i> – Elexon need to be careful that this guidance does not conflict with the DCUSA which actually states that the formal disconnection notice must come from the supplier. • <i>"The proposed change ...reduces the possibility of discrepancies arising in the number of MSIDs registered. Such a reduction in the instances of registered MSID discrepancies would improve the integrity of Settlement"</i>. – I'm not sure how introducing timescales would assist in a reduction in the number of discrepancies arising in the number of MSIDs registered. When a disconnection occurs, the D0171 is sent from MPAS to the supplier, only then should the supplier note that the MSID has been removed. Surely then it is the supplier that must be required only to hold a customer as disconnected once confirmation has been received. <p>Providing that the LDSO sends the necessary flows within 5 working days of making a change to the energisation status, or 5 working days of disconnection, the accuracy of settlement should be ensured. Finally, this DCP is focussed only upon physical work; the process for logical retrospective disconnections is not sufficiently covered in the BSCP515.</p>	✓	270

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>Impact: Impact on Business Processes and systems.</p> <p>Implementation: Minimum of 9 months notice from agreement of red lined changes.</p>		
Central Networks	X	<p>Disagree: Too many changes suggested to comment upon-new workshop required to consider impact. The changes impact upon de-en process & disconnection, 2 separate processes.</p> <p>Changes do not take into account the outcome of the last BSC audit; hence suggested change may be out of date.</p> <p>Appears to be lack of understanding of LDSO process; appointments are primarily customer driven not Supplier.</p> <p>No reference made in respect timescales on Supplier in updating SMRA with de-en flow-D0205, in order that LDSO can disconnect & send D0125 & D0171 flows; hence many MPAN's are not disconnected in a timely fashion as the LDSO is waiting for the Supplier to de-en in MPAS.</p> <p>In the majority of cases, the date provided by the Supplier is the date the meter is being removed not the date the customer requires the cable removing; Central Networks require a minimum of 15 working dates for LV disconnection & 6-8 weeks for HV & work is subject to the requirements of the Traffic Management Act.</p> <p>By being better informed of the date, what further input would you expect Suppliers to have; many are in communication with the Customer not the demolition contractor.</p> <p>Unclear what issue the change is trying to resolve.</p> <p>Impact: Impact on Business Processes & systems</p> <p>Implementation: Minimum of 1year required from agreement of red lined changes</p>	✓	365
Scottish and Southern Energy	X	<p>Disagree: Although we believe that these processes can benefit from</p>	✓	12 months

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		improved clarity, we do not believe that the proposed timescales and obligations are appropriate. Impact: Impact on our systems and processes Other Comments: What is the materiality of the discrepancies in registered MSID? Is there a cost justification in implementing this proposal?		
Association of Meter Operators	-	See comments in redlining table below	-	-
E.ON UK Energy Services Limited	-	Neutral: This proposal will have no direct impact on our activities	-	-

Comments on redline text

No.	Organisation	Section	Comment
1	Western Power Distribution	BSCP515 3.5 & 3.6 General point	If firm timescales are to be agreed then it should be documented in the BSCP that the Supplier should send their MOA to do the energisation status change unless their MOA is not authorised to do the work (typically HV and LV ACB CT metering). LDSO does not operate in competition with the MOA and, except in emergencies, should not be requested to change energisation status for LV whole current and fuse operated CT metering. LDSO should not be used as a substitute to the MOA in cases where the MOA is not properly resourced which sometimes seems to be the case currently.
2	Western Power Distribution	BSCP515 3.5.1 footnote 3 3.6.1 Footnote 10	It is appropriate for Suppliers to request firm appointment dates from a meter operator because they have a contractual agreement with them which specifies service standards. The equivalent contract between Suppliers and LDSOs is the DCUSA and this simply requires LDSO to attend "within a reasonable time". We believe the timescales specified in the DCUSA have precedence over any specified in the BSC. LDSO is not an agent of the Supplier and the Supplier should not make firm appointments on the LDSO's behalf as it has no right to do so. We will use reasonable endeavours to attend as requested but may need

No.	Organisation	Section	Comment
			<p>to reschedule appointments due to operational requirements such as repairing faults. Suppliers should not guarantee to a Customer that LDSO will attend on the date requested.</p> <p>Where we do need to reschedule we have no objection to keeping the Supplier informed but this must be on a reasonable endeavours basis.</p>
3	Western Power Distribution	BSCP515 3.5.3 3.6.3	<p>What flow is proposed for this?</p> <p>In the case of Customer requested energisation status changes, we may not be able to confirm the MPAN until the site visit so will not be able to give advance notice to the Supplier. Also, if the Customer requests it and we are able to do so, we will attend on site on the same day the Customer contacts us. It will therefore not always be possible for LDSO to comply with this proposed new requirement.</p> <p>In the case of Supplier requested energisation status changes, the appointment date is not currently a mandatory field in the D0134. The proposed wording does not address what should happen in the event a Supplier request is received with no appointment date</p>
4	Western Power Distribution	BSCP515 3.5.4 3.6.4	<p>The current D0139 will not let LDSO reject the request for reason "can not attend on the date requested". How is it proposed we do this?</p>
5	Western Power Distribution	BSCP515 3.5.4 Footnote 4 3.6.4 Footnote 12 3.5.6 footnote 6 3.6.10 footnote 14	<p>This is totally unacceptable and is a great example of putting the process first instead of putting the Customer first.</p> <p>In cases where we are unable to attend as requested by the Supplier, in cases where we attend as requested but can not complete the works on that day, or where we need to cancel an appointment at short notice, if possible we will inform the customer of the reason and attempt to agree another appointment date. It seems ludicrous to mandate that we can not do this as it actually reduces the level of customer service provided.</p> <p>We will continue to put the Customer first in this process.</p>
6	Western Power Distribution	BSCP515 3.5.6 3.6.10	<p>What flow is proposed for this?</p>

No.	Organisation	Section	Comment
7	Western Power Distribution	BSCP515 3.7	<p>It doesn't appear that the proposer of this change actually understands the process.</p> <p>For physical disconnections, except in emergencies when we need to take urgent action, the disconnection process involves the following steps:</p> <ol style="list-style-type: none"> 1. Carrying out a site visit to ascertain the scope of the work needed. This could be a simple pot-ending of a service, severing an underground cable or complete removal of the service in the case of a site redevelopment. 2. Preparing a quote for the necessary work and sending it to the Customer. 3. Receiving payment from the Customer. 4. Scheduling the work. 5. Carrying out the work. (This is the disconnection date). 6. Completing the records and sending notification to MPAS and Supplier, which we always aim to do within 5 working days of the disconnection. <p>We presume the date referred to in footnote 17 is expected to be the actual disconnection date. If a Supplier is capable of accurately forecasting it at the time it sends the D0132 then hats off to them. In reality though the D0132 really just acts as a prompt for the Distributor to contact the customer start off the physical disconnection process.</p> <p>The proposed new process is also not really suitable for logical disconnections. The vast majority of these contain retrospective disconnection dates. In these cases, if we accept the request, the logical disconnection is done there and then and there is no opportunity for us to give advance notice that we accept the request unless we introduce a delay.</p> <p>The DCP wording suggests that these changes will enable Suppliers to better manage the disconnection process. This is probably why the proposals don't really make a lot a sense. Suppliers don't actually manage the disconnection process; the LDSO does.</p> <p>It isn't really worth commenting on the proposals on a line by line basis until it is clear exactly what issue is trying to be solved by the changes. However, a quick scan of the proposals raises concerns similar to those we have over the proposed amendments to the change of energisation status process.</p> <p>Having attended the "disconnection workshop" held last year we understood the main problem for Suppliers was that Suppliers who send a D0132 often hear nothing back for a considerable period or hear nothing back at all. This is understandable as the Customer will often take months to pay us for the work or will not</p>

No.	Organisation	Section	Comment
			<p>respond to us at all. This is the primary reason for delays in the process.</p> <p>Parties at the workshop agreed that these issues would not be solved by making changes to the process but by improving communications so that Suppliers could ask the LDSO what was happening when they need to do so. A review of the contact lists for Suppliers and Distributors held under the MRA was subsequently carried out.</p>
8	CE Electric UK (NEDL & YEDL)	BSCP515 3.5 & 3.6 General point	<p>If firm timescales are to be agreed then it should be documented in the BSCP that the Supplier should send their MOA to do the energisation status change unless their MOA is not authorised to do the work (typically HV and LV ACB CT metering).</p> <p>LDSO should not be requested to change energisation status for LV whole current and fuse operated CT metering.</p> <p>LDSO only ever receive the D0134 in a small number of circumstances.</p>
9	CE Electric UK (NEDL & YEDL)	BSCP515 3.5.1 footnote 3 3.6.1 Footnote 10	<p>It is appropriate for Suppliers to request firm appointment dates from a meter operator because they have a contractual agreement with them which specifies service standards.</p> <p>The equivalent contract between Suppliers and LDSOs is the DCUSA and this simply requires LDSO to attend "within a reasonable time". The BSC should ensure that is aligned to the DCUSA.</p> <p>We will use reasonable endeavours to attend as requested but may need to reschedule appointments due to operational requirements such as repairing faults.</p>
10	CE Electric UK (NEDL & YEDL)	BSCP515 3.5.3 3.6.3	<p>I am not sure that this is the best way to undertake this process. What mechanism is there in place if the date then changes? Often, an LDSO may schedule a date for the work to take place and then a serious issue may arise which diverts the LDSO's attention. The supplier should not assume the de-energisation has take place until a D0139 confirming has been received.</p>
11	CE Electric UK (NEDL & YEDL)	BSCP515 3.5.4 3.6.4	<p>The current D0139 will not let LDSO reject the request for reason "cannot attend on the date requested". Support the revised timescale of 5 working days for rejection.</p>
12	CE Electric UK (NEDL & YEDL)	BSCP515 3.5.4 Footnote 4 3.6.4	<p>Agreed</p>

No.	Organisation	Section	Comment
		Footnote 12 3.5.6 footnote 6 3.6.10 footnote 14	
13	CE Electric UK (NEDL & YEDL)	BSCP515 3.5.6 3.6.10	Is this just not the same as using the D0139 to reject?
14	CE Electric UK (NEDL & YEDL)	BSCP515 3.7.1 Footnote 16	Surely this needs to be in line with the DCUSA which specifies that the supplier must be the originator of the formal disconnection notice.
15	CE Electric UK (NEDL & YEDL)	BSCP515 3.7.2	I'm not sure how these timescales will assist the process, rather than just convolute it with requirements. The supplier should never assume a disconnection has gone ahead until they receive the D0171 from MPAS (and/or D0125 from LDSO)
16	CE Electric UK (NEDL & YEDL)	BSCP515 3.7.3	It is not up to the supplier to dictate the date that the LDSO can go out and disconnect, rather the date provided should be used as a guide and the LDSO will contact the customer to arrange a firm date and time. If every request was to be rejected due to the LDSO not being able to meet the requested date then almost all of the requests would be rejected.
17	CE Electric UK (NEDL & YEDL)	BSCP515 3.7.6	Agreed
18	Scottish and Southern Energy	BSCP515 3.5.1 footnote 2	In what circumstances does the LDSO energise as a direct request from the customer? LDSO should refer the customer to contact the Supplier. Energisation requests should be driven by the Supplier and not the customer following the Supplier Hub principle.
19	Scottish and Southern Energy	BSCP515 3.5.3	In view of the above, the action for energisation requested by customer is not applicable. Where the supplier requests the Energisation, and the D0134 has a requested date (footnote 10) then is this action necessary?
20	Scottish and Southern Energy	BSCP515 3.5.4	Is there a field for the optional information on the D0139?

No.	Organisation	Section	Comment
21	Scottish and Southern Energy	BSCP515 Footnotes 9 and 16	The most likely time that the customer will contact the LDSO, is in an emergency/safety situation and therefore treated as an emergency.
22	Association of Meter Operators	BSCP515 3.5.1	Suppliers are required to be appointed to authorise energisation. Allowing customers to do this may cause confusion – not sure why this note has been added.
23	Association of Meter Operators	BSCP515 General	DCUSA requires supplier to ask MO to perform De-energisation or energisation wherever they are able. Although in some cases the MOs are unable to do the work, such as HV sites, MO unable to access equipment located in Distributors substation, operational restrictions on cut-outs, requirement for Distributor to make final connection of LV lugs, and provide fuses.
24	Association of Meter Operators	BSCP515 3.5.3 3.6.3	Would expect a flow to be stated, if not a DTC flow, then a P flow. P0211 is quoted in other sections, if this can not provide all the information, then suggest adding data items to it.
25	Association of Meter Operators	BSCP515 3.5.7	Should read: Within 5WD of 3.5.5
26	RWE npower	BSCP515 3.5.1 footnote 3	Also in 3.6.1 and 3.7.1 These sections all include a "Requested Date" although this is not a mandatory field within the D0134.

DCP0032 - New Consumption Totals report

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Western Power Distribution	Distributor , LDSO	✓
ScottishPower	Supplier , Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	X
Scottish and Southern Energy	Supplier, LDSO, Generator, Trader, Party Agent, Distributor	X
British Energy	Supplier ; Trader; CVA MOA; Generator	-
CE Electric UK (NEDL & YEDL)	LDSO	-
TMA	HHDC, HHDA, NHHDA	-
RWE npower	Supplier, Supplier Agent	-
E.ON UK Energy Services Limited	NHHDC, NHHDA, HHDA, HHDC, MOA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Western Power Distribution	✓	<p>Favoured Option: B</p> <p>Comment: We would favour receiving the report by monthly email.</p> <p>Impact: Systems development and changes to business processes to be able to utilise the additional data.</p> <p>Implementation: Minimum 6 months notice for development work.</p>	✓	180
ScottishPower	X	<p>Disagree: It is believed that the new (June Release) D0276 flow will provide similar information, therefore we can see no justification for a new report with additional costs for the industry.</p> <p>Favoured Option: A/B - Neither option is favoured</p>	✓	180

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		<p>Impact: System changes required to accept new dataflow</p> <p>Other Comments: Do not believe that the additional report would be useful as we already receive the pertinent information.</p>		
Scottish and Southern Energy	X	<p>Disagree: Both the options in the proposal have cost implications and impact on systems and processes. This DCP might benefit from further investigations into finding other solutions.</p> <p>For example, an Option 3:</p> <p>To have a full 'All GSP Groups' generic D0276 available to all other suppliers and distributors who would like to receive it. (Perhaps this could be populated with a generic Supplier ID and a generic Supplier Name, but could be sent to the relevant party id through the usual DTN route with the appropriate 'Header' information for each Role Code/Party.)</p> <p>Favoured Option: Neither</p> <p>Impact: Impacts on systems and processes</p>	✓	-
British Energy	-	<p>Neutral: We would welcome additional clarification of the perceived benefits of this proposed change. However, greater transparency to the Industry is to be welcomed.</p> <p>Impact: Systems and processes changes.</p>	✓	90
CE Electric UK (NEDL & YEDL)	-	<p>Favoured Option: B</p> <p>Comment: If implemented CE would prefer option B sent via email to avoid a change to the DTN</p> <p>Impact: If option A is implemented a system change will be required</p>	✓	-
TMA	-	-	X	-
RWE npower	-	<p>Neutral: We have no comment to make on this proposal, other than we would not support any DTC changes which might necessitate system</p>	-	-

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
		changes, unless there is a strong benefit case for doing so.		
E.ON UK Energy Services Limited	-	Neutral: This proposal will have no direct impact on our activities	-	-

CP1245 - Communication of Data Estimations and Substitutions for Central Volume Allocation Metering Systems

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
British Energy	Supplier ; Trader; CVA MOA ; Generator	✓
TMA	HHDC, HHDA, NHHDA	✓
Scottish and Southern Energy	Supplier, LDSO, Generator, Trader, Party Agent, Distributor	✓
RWE npower	Supplier, Supplier Agent	X
Western Power Distribution	Distributor, LDSO	-
CE Electric UK (NEDL & YEDL)	LDSO	-
ScottishPower	Supplier, Distributor, HHDC, HHDA, NHHDA, NHHDC, UMSO, MO, MOA, LDSO	-
E.ON UK Energy Services Limited	NHHDC, NHHDA, HHDA, HHDC, MOA	-

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
British Energy	✓	<p>Agree: We support this CP and believe it will significantly improve the Registrant's ability to determine data used for settlement at any given time.</p> <p>Impact: We will be updating our internal processes to reflect this change. As the only changes to the CDCA-I014 relate to timing and frequency of receipt, no system changes are required.</p> <p>Would implementation in the proposed Release have an adverse impact? No</p>	✓	30
TMA	✓	-	X	-
Scottish and Southern Energy	✓	-	X	0

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
RWE npower	X	Disagree: We would prefer the relevant IO14 flows to be sent on the same day as the IO12 flow for validation purposes.	-	-
Western Power Distribution	-	-	X	-
CE Electric UK (NEDL & YEDL)	-	-	X	-
ScottishPower	-	<p>Neutral: ScottishPower is content with the current process for agreeing estimates and as a registrant does not see the need for this change.</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> <p>Other Comments: ScottishPower does not utilise the IO14, so the proposed Solution does not cause any system problems.</p>	X	2
E.ON UK Energy Services Limited	-	Neutral: This proposal will have no direct impact on our activities	-	-