CPC00618 – Impact Assessment Responses for DCP0016, DCP0017, DCP0018, DCP0019, DCP0020 DCP1221, DCP1222 and CP1216

DCP0016 - Effective Date Validation in the D0052

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
CE Electric UK	✓	**Agree Change Comment**: It should be noted that this response is from an unmetered perspective only, as the UMSO and the LDSO do not have any involvement in the sending or receipt of D0052s for metered connections. CE Electric UK currently have a high volume of D0052 failures which is resulting in a variance between the consumption held by the UMSO and the consumption entering settlement of approximately 17Gwh. This change has been anticipated by CE in order to resolve the current issues. **Favoured Option**: Convention 2, Implementation b **Option Comment**: Please see "other comments". **Impact Comment**: No – if favoured option is implemented **Implementation Comment**: 0 – assuming favoured option is implemented **Other Comments**: Convention CE Electric UK is in favour of convention 2 – relate settlement data to supplier registrations – EFSDs will be updated following a CoS and where there is a change to the related data item. SMRS is the master system for all registration data and therefore all registration data and EFSDs should be validated against this data. Convention 1 – relate settlement data to metering systems – EFSDs will be updated only where there is a change to the data items. This is not in line with SMRS i.e. MPRS data items are	X	0

		updated on CoS therefore this data should not be used This convention would introduce considerable additional effort for CE as each data item EFSD would need to be retrieved manually, this would be impractical. Convention 3 – flexible – no standard convention is not an option for CE Electric UK as it would not resolve the issue. There needs to be a standard approach for the creation and validation of settlement data so that all parties are in line with one another and so that the data entering settlement is consistent and there is no room for error. Implementation CE Electric UK is in favour of conventions b – incremental. The current error in settlement due to the D0052 EFSD issue is of high magnitude and this error needs to be corrected. The big bang implementation would be a quick win solution to resolving the error in settlement but may result in high volumes of rejections. The incremental implementation would resolve the error but at a slower rate and the rejection volumes would be lower in comparison to the big bang implementation and therefore more manageable.		
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	**Agree Change Comment**: In relation to the UMS related issues there should be some scrutiny in the circumstances of when the EAC effective from dates should be changed. Our experience is that the NHHDC cannot produce a D0019 to NHHDA where the EAC effective from date on the D0052 is earlier than the NHHDA appointment date. ScottishPower Ltd suggests that we either relax the validation of applying D0052 in such circumstances or that UMSO's change the EAC effective from date to match the NHHDC appointment date in MPAS. **Favoured Option**: 3 **Option Comment**: We would opt for convention 3 effectively advocating no change. However this should be supplemented with the removal of the requirement for NHHDC's to validate data items such as EFSD's and GSP dates. There is also an argument that if the set of inconsistent details are both greater than 14-months old (e.g. GSP effective dates of 1/4/1996 and 1/4/1998) there is no material impact on settlements. The DCP seems to be looking at changing they way we populate data to meet the needs of validation rather than looking at whether we can work with the same data	✓	180

		but validate in a more pragmatic manner. **Capacity in which Organisation is Impacted**: Supplier, NHHDC, MOA, UMSO **Impact Comment**: Depending on the option agreed there could be significant impact on our systems, data and business processes. **Other Comments**: Though there is a valid issue with the way that EFSD is being populated in the D0052 we believe that options 1 and 2 are not the correct way forward. A more sensible approach would be to focus less on the costly, time consuming and impractical data standardisation and focus on the validation that is undertaken when a D0052 is received. By validating in a more logical and realistic manner the market will see a reduction in D0052 rejections, improve the quality of data in Settlements and avoid the unnecessary cost of a mass re-write of existing data.		
Western Power Distribution	✓	**Favoured Option**: 3 **Option Comment**: We consider that the flexible solution, requiring NHHDCs to change validation rules to prevent D0052 failures due to mismatches in EFSDs, is the only viable solution. Implementation of the revised validation should also be flexible, subject to a cut-off date by when all NHHDCs should have implemented the change. **Impact Comment**: No – provided the flexible approach is taken.	X	-
EDF Energy	✓	**Favoured Option**: Option 3, Implementation option 4 **Option Comment**: This draft CP has to be considered in current optional framework. If we were starting again then I believe we would strongly vote for option 2. This convention ensures each Supplier is responsible for all data items in their registration period and does not need to be aware of previous data. However, to get to that option from current ways of working is too problematically, unless totally new flows were created and D0052 and D0310 discontinued. We can see no appetite for such a change. Therefore, we believe that option 3 is only practical way forward as a convention. This though puts onus on all NHHDCs to be able to deal with any eventuality. We know that some NHHDCs currently require dates that refer to previous a supplier's period, these are not always available to	✓	270

		the current supplier. If this is not how your system has been built then everything fails lead to excessive manual work. Option 4 for implementation seems to be most appropriate for convention 3. **Capacity in which Organisation is Impacted**: Supplier (depending upon final option chosen) and NHHDC **Impact Comment**: Changes will be required to NHHDC systems if this CP is taken forward. Depending upon option chosen changes could be required to Supplier systems. **Implementation Comment**: We would need at least 9 months from decision point to make these changes.		
E.ON UK Energy Services Limited	✓	**Agree Change Comment**: We would support proposal number 3 The flexible approach. **Favoured Option**: 3 **Capacity in which Organisation is Impacted**: NHHDC/DA **Impact Comment**: Where this DCP be approved a review of our current systems and processes would be required and amended as necessary. It is anticipated that proposals 1 & 2 would have a significantly greater impact.	✓	180
IMServ Europe Limited	✓	**Agree Change Comment**: IMServ in its role as an accredited NHHDC agent would suggest that there is value to be gained from implementing a standard set of rules for how the EFSDs are populated in the D0052s. We would suggest that convention 1 would be the best solution to implement and would prove the most effective based on our experience to date on this issue. It would ensure that a simple single rule could be adopted and it ensures that there is no confusion over what the EFD should be – it is the last date of change of that data item – as it is a single non confusable date. Implementing convention 2 would result in extra data items and dates being stored on databases which would inevitably over time lead to increased confusion over what the effective from dates should be. Dates	✓	180

		would have to be lined up to CoS dates and then what happens when CoS events are objected to and backed out? Does this also back out the EFSDs of the settlement data items or do they remain unchanged and then mismatch with the CoS events that they were updated in line with. This would lead to increased confusion. Implementing Option 3 would not improve the situation and leave the issue unaddressed. In terms of the implementation of this then it is felt that options a) "big bang" would be a risky implementation to change all the existing dates especially as a lot of the dates will already be in NHHDA systems and may raise the level of D0023s if not implemented 100% successfully for NM type error codes. We would suggest an incremental approach to set all dates for all data changes made moving forwards. This will take longer to address the issues but will ensure consistency from the implementation date and gradually reduce the impact of the existing issue with low risk to affecting the existing settled data and existing EFSDs. Options c) and d) are considered to be tinkering approaches that will add confusion and ultimately result in the same mismatches occurring as exist with existing processes. **Favoured Option**: 1 **Option Comment**: This is the only convention that we would support. **Capacity in which Organisation is Impacted**: NHHDC / DA agent **Impact Comment**: We would need to change some of the validation routines in the NHHDC system to improve validation in accordance with the newly established agreed rules.		
TMA	✓	**Favoured Option:** 3 and d **Comments:** Clear validations rules are paramount for the change to be effective.	X	-
British Energy Power & Energy Trading Ltd	✓	**Agree Change Comment**: BEDL fully support the rationale behind this draft change proposal. Removing confusion in this area will enable the	X	0

		resolution of outstanding data irregularities. Having reviewed the suggested conventions and implementation methods, we are in favour of Convention 2: Relate Settlement data to Supplier Registrations and Implementation a: Big Bang. Convention 2 is consistent with the Supplier Hub principle and clarifies the existing convention that a default EFSD is valid for the D0052. Our concern with convention 1 is that where a number of change of supplier events have taken place, from a MPAS and industry perspective, how could this be correctly unpicked? We do not believe that convention 3 is robust enough and it will not resolve the issue. We support a big bang implementation because it will ensure that the working practice will be carried out by all market participants from a point in time. **Favoured Option**: Convention 2 with a Big Bang implementation. **Impact Comment**: No – favoured option only. **Capacity in which organisation is Impacted**: Our favoured option will not require any system changes and could be implemented immediately. However, if it is decided that convention 1 is to be applied then a significant change to our systems would be required to allow the acceptance of EFSDs to be prior to our registration date. We anticipate that costs would be high and we would need no less than 12 months to make the necessary changes, test and implement. **Implementation Comment**: Favoured option only.		
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	X	**Favoured Option**: Flexible convention with D0052 population **Option Comments**: Our options, if this is progressed through. **Impact Comment**: Changes to our system **Implementation Comment**: To allow for our IT change schedule. **Other Comments**: Whilst we fully support the ultimate objective of this DCP, we question the justification in terms of cost and effort when compared to the level of improvement achievable. We believe that the materiality needs further analysis. The sample used for analysis (pg 5, SVG76/08 paper) would suggest a duplication in volumes and timing issues. On page 6, the rejection	✓	6-9 months

		reasons would suggest that there is a need for guidance/ understanding of the reason codes on the D0310. There also appears to be issues between certain parties only. The last paragraph of the Preferred solution in this DCP suggests that the inconsistency in the EFSDs is irrelevant provided the DC removes that validation rule. The validation rule needs to be clarified as we believe that the problem will still exist if there are different permutations of those rules. The largest material error in settlement is the Unmetered supplies. The 2007 Auditor's report for the Unmetered supplies implies that the issue of that of EAC mismatch as opposed to EFSDs. Therefore, implementing this change will not necessarily reduce the settlement error in the Unmetered market. We believe that this draft proposal as is, is not fit for purpose and as such should not be progressed to CP.		
United Utilities	-	-	-	-
Gemserv Ltd	-	**Capacity in which Organisation is Impacted**: MRA Service Company **Impact Comment**: Possible impact on the DTC **Implementation Comment**: Changes implemented in line with MRASCo's release strategy Normally allow 6 months from changes to the DTC. As this is a documentation change only it may be possible to implement the change quicker. **Other Comments**: If this change is implemented in line with the preferred option of creating a rule for the population of the flow then we suggest that it may be worth considering updating to the DTC either by: adding notes to the flow to that effect; or, if the notes are likely to be relatively lengthy (ie more than two or three sentences) then we suggest adding the update to Annex C, where the rules for populating some data flows are stored.	✓	2 months
RWE npower	-	**Capacity in Which Organisation is Impacted**: Potential impacts on	-	-

		Supplier or NHHDC systems dependent on option progressed. **Implementation Comment**: At this stage we are unable to provide a definitive answer but it is expected that should there be any system changes as a result of the eventual approved red-lined changes then this would require at least 6 months implementation notice. **Other Comments**: Comments regarding the implementation options: Big Bang What would happen to those 'work in progress' MPANs that are going through for example a CoS event, CoA event, New Connection, Meter Exchanges etc.– analysis would need to be carried out to understand how the proposed option would impact these events. Incremental In this instance what would happen if only the Profile Class changes? What will happen to the dates for SSC SCON, MC EFSD, GSP etc in the D0052? D0052 population This approach could potentially impact upon CoA events and the effective from dates contained in the D0152 for the new NHHDC. D0052 Validation How would this implementation method work? We believe more clarity is required in the CP around this proposal. We would also like to add that there are no time scales referenced in the solution.		

DCP0017 - Inconsistencies within the CDCA Service Description and URS

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	Issue 34 – assume reference of CDCA-I037 is the Estimated Data Notification.	X	0
TMA	✓	-	X	-
British Energy Power & Energy Trading Ltd	✓	**Agree Change Comment**: Agree subject to comments below being resolved **Other Comments**: Issue 11 makes reference to 'UTC', whereas Issue 12 states that references to 'Universal Time Clock' should be amended to 'Co-ordinated Universal Time' , which is inconsistent. If the latter is correct, Issue 11 should refer to 'CUT@ which may need to be defined, otherwise	X	-

		issue 12 should be deleted.		
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	X	-
E.ON UK Energy Services Limited	-	-	X	-

DCP0018 - Inconsistencies within the BMRA Service Description

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
TMA	✓	-	X	-
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	X	-

E.ON UK Energy Services Limited	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-

DCP0019 - Inconsistencies within the ECVAA Service Description

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	-	-
E.ON UK Energy Services Limited	-	-	X	-

TMA	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-

DCP0020 - Inconsistencies within the SAA Service Description and URS

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
British Energy Power & Energy Trading Ltd	✓	**Agree Change Comment**: Agree subject to comments below being resolved **Other Comments**: 1 Issue 10 suggests a global change from 'System Operator' to 'Transmission Company'. This is incorrect. There are three Transmission Companies (owners), one each for E&W, S Scotland and N Scotland, but only one System Operator. The interface with SAA is with the System Operator not the Transmission Company; the System Operator has the interface with each Transmission Company.	X	-

		2 Issues 24 and 25 both make references to actions placed upon the Transmission Company. In both cases this should be the System Operator.		
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	-	-
E.ON UK Energy Services Limited	-	-	X	-
TMA	-	-	X	-

DCP0021 - Inconsistencies within the Code Subsidiary Documents regarding Business Requirements

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	-	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
British Energy Power & Energy Trading Ltd	✓	**Agree Change Comment**: Agree subject to comments below being resolved **Other Comments**: Issue 45 suggests a global change of references to 'System Operator' should be changed to 'Transmission Company'. This is incorrect. There are three Transmission Companies (owners), one each for E&W, S Scotland and N Scotland, but only one System Operator. The System Operator is the provider of data, not the Transmission Company.	X	-
RWE npower	✓	-	-	-

United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	-	-
E.ON UK Energy Services Limited	-	-	X	-
TMA	-	-	X	-

DCP0022 - New Service Description for the SVAA

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	**Impact Comment**: Document changes only	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	-	-
E.ON UK Energy Services Limited	-	-	X	-

TMA	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Document: SVAA Service Description Location: 7 Appendices 7.1 Appendix 1	In the first table in Appendix 1 – Type of Information refers to "(for each MDD load into ISRA)" and the Minimum Requirements also states "Date and time loaded into ISRA" The term ISRA on both occasions should be changed to SVAA as ISRA is old terminology and this is an opportune time to make the change. In addition other elements of the appendices refer to SVAA, therefore for consistency the term SVAA should always be used.

CP1216 - Changes to Section 3.1 of BSCP509 to reflect a new process for the acceptance of the Profile Administrator (PrA) 'Technical Product Deliverables' (TPDs) for inclusion in the Market Domain Data (MDD).

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	✓	**Impact Comment**: Document changes only	X	0
EDF Energy	✓	-	X	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
RWE npower	✓	-	-	-
United Utilities	-	-	-	-
Gemserv Ltd	-	-	X	-
CE Electric UK	-	-	-	-

E.ON UK Energy Services Limited	-	-	X	-
TMA	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-

Comments on redline text

No Comments on redlined changes