CPC00627 – Impact Assessment Responses for DCP0028

DCP0028 - 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)	Favoured Option
United Utilities metering	**Meter Operator**	✓	1
TMA	HHDC, HHDA, NHHDA (UDMS and LBSL)	✓	1
British Energy	**Generator, Supplier**, Trader, **Party Agent**	✓	1
RWE npower	Supplier, Supplier Agent, **Trading**	✓	2
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	X	2
ScottishPower	**Supplier**	X	None
CE Electric UK	LDSO	-	1/2/3

Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Favoured Option	Comments	Impact (✓/X)	Days Required to Implement
United Utilities metering	✓	1	Please consider the role of Meter operator in this process as they can provide an insight as to the reasons for data substitution.	X	30
TMA	✓	1	It would add value to the process by making the CDCAI014 useful and meaningful	X	-
British Energy	✓	1	**Impact**: There will be a small impact on our customer invoicing systems, but the cost associated with this will be far outweighed by the benefits gained from improved visibility of current Settlement data. **Implementation**: 30 days for Options 1 and 3. 90 days for Option 2. **Other Comments**: The existing CDCA data estimation process	✓	30-90

			creates a degree of ambiguity over the application of estimated and substituted data within Settlement. The proposed changes will remove this ambiguity and streamline the estimation process, providing parties with certainty of the meter data being used in settlement at any given time. This in turn will facilitate data validation thus improving the efficient delivery of data quality and accurate and timely party and, in the case of suppliers, customer billing.		
RWE npower	✓	2	**Comments on Favoured Option**: We favour option 2. However we have comments against all three options: Option 1: As the change proposes, we would expect the relevant I014 flows to be sent on the same day as the I012 flows so that we can carry out our own validation between the two. However, the proposal depends on the I014 files following the associated I012 files issued each day which may not occur if there are any difficulties in transmitting files. Hence this is not our preferred option. Option 2: If estimated/substituted data is included in the CDCA-I012 file, the flag system must provide sufficient information to indicate what source has been used for the substituted data (e.g. which main or check meter used, or substituted data that is otherwise derived.) Option 3: We do not support the production of a new flow as process change can be accommodated within existing flows. **Impact**: This change may require both system and process changes. **Other Comments**: If there is to be a move away from the agreement via I037 to substituted data, then Parties should be provided with sufficient information to validate the substituted data that has been used.	✓	Not yet ascertained
Scottish and Southern Energy	X	2	**Comments on Favoured Option**: We agree that the current process for agreeing estimates is quite	✓	-

			cumbersome and that there is the potential for error when estimates are keyed into both CDCA and registrant activities. However, we do not agree that it is only possible for the registrant to confirm that the CDCA have correctly entered estimated data upon receipt of the I014 flow, this depends entirely upon the Registrants systems. With regards to the possible solutions: Option 1. We do not feel that this option addresses the issue of providing a clear view of the data actually used in Settlements. Estimates/substituted data could still be replaced with actual data if a dial failure was rectified even if an I014 had been used. The I014 would therefore continue to show data that had not been included within Settlements. This option also has timing implications, at present the I012 is issued at Day+1, whilst CDCA have until the II run at Day+6 to resolve issues or enter estimated/substituted data. Option 2. We believe that this is the best of the proposed solutions, it would reduce the risk of manual errors in Settlements being undetected, it reduces the manual workload in entering estimates into our own systems. It also provides an unambiguous indication of the data that has entered Settlements and provides a guaranteed history of the changes in data. However, this option does not detail how a Registrant would query an estimate, changes to BSCP03 would be needed to incorporate a process that allows for the raising of queries detailing appropriate timescales etc. Changes to SONET (as a result of the change in the flow) and our internal processes would be required to initiate checking of estimated substituted data upon receipt of the flow, rather that being triggered by receipt of an I037. In addition, section 1.7 of BSCP03 does not detail how estimates will be derived if Secondary outstation/check metering data is unavailable, this would require further clarification if agreement from the Registrant is no longer sought. Option 3. We see little benefit in this option; it introduces both additional		

			flows and additional processes, without any of the benefits of Option 2. And we disagree that it would allow accurate determination of final values included within Settlements.		
ScottishPower	X	None	**Disagree**: None of the three proposals provide any benefit over the current process. **Comments on Favoured Option**: Solution 1 ScottishPower does not utilise the IO14, so Solution 1 does not cause any problems provided that the two basic requirements noted in "Other Comments" are not compromised. Otherwise ScottishPower disagrees with Solution 1. Solution 2 ScottishPower strongly disagrees with Solution 2 as this would allow estimated data to be used on the IO12 with a flag for a reason code. This would compromise validation (as noted in "Other Comments") and would incur the expense of system changes. Solution 3 ScottishPower disagrees with Solution 3. This would also require system changes causing similar adverse effects as per Solution 2. **Impact**: Validation of GSP Group Take on behalf of the Distribution Business is adversely impacted by the proposed change. Implementation: Any changes would require modifications to ScottishPower's Settlement Verification system, which is developed as part of a consortium. Software releases to be timed to agree with changes to SVA (i.e. Feb; June; Nov). **Other Comments**: ScottishPower is content with the current process for agreeing estimates and as registrant will still want be in control of this process. ScottishPower wants to retain the right to accept or reject estimated	✓	270

			data. In almost all cases, the problem that caused the estimates is repaired within a few days and real data is retrieved. I037 information is generally irrelevant. On occasions the missing data is not retrieved, in which case there are IO12/IO29 discrepancies at II. A "data retrieval" is then requested. As a result, estimated data is almost never utilised in Settlement at SF. ScottishPower does not want estimated data to load automatically into verification systems. If this was the case, ScottishPower would not have an IO12/IO29 discrepancy (a check point) due to the same estimated data being used on both flows. Therefore if the proposed I012 contained estimated data, additional checks would be required to ensure that all estimated data was overwritten with actual data. This would require system changes to meet this additional requirement. Therefore there are no advantages and several disadvantages of auto accepting CDCA estimates and loading them into verification systems.		
CE Electric UK	-	1/2/3	-	✓	-