

## P223 Assessment Consultation Responses

Consultation Issued on 15 July 2008

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Scottish Power Ltd	P223_AR_01	7	0
2.	Good Energy Ltd	P223_AR_02	1	0
3.	British Energy	P223_AR_03	5	0
4.	RWE Npower	P223_AR_04	10	0
5.	Scottish & Southern Energy plc	P223_AR_05	7	0
6.	BizzEnergy Ltd	P223_AR_06	1	0
7.	E.ON UK Energy Services Limited	P223_AR_07	0	1
8.	EDF Energy**	P233_AR_08	9	0
9.	Centrica**	P223_AR_09	9	0
10.	E.ON**	P223_AR_10	5	0

\*\* Late Response

**Question 1: Do you believe Proposed Modification P223 would better facilitate the achievement of the Applicable BSC Objectives when compared with the current profiling arrangements?**

### Summary

Yes	No	Neutral/Other
4	6	0

### Responses

Respondent	Response	Rationale
Scottish Power Ltd	No	While the modification does address many of the existing issues with the Profile Sample, so satisfying Objective C, the increased costs and loss of efficiency during the CoS process would serve to negate most of these benefits. Therefore, P223 would not satisfy objective D.  Therefore ScottishPower does not support the

Respondent	Response	Rationale
		implementation of the P223 Modification Proposal.
<b>Good Energy Ltd</b>	Yes	The proposal will improve the sample and thus accuracy of the profiles which are currently deteriorating. The proposal will increase the accuracy of settlements, and thus meets the all the objectives a to d.
<b>British Energy</b>	Yes	<p>The issues causing difficulty for customer recruitment do not appear fundamentally insurmountable under the current arrangements, and it is disappointing that the Profile Administrator with support from Suppliers and Elexon cannot together resolve the situation. However, the continuing trend of reduced recruitment indicates there is insufficient incentive on participants collectively under the current arrangements.</p> <p>The proposed modification may improve the situation by putting responsibility more directly on suppliers, who have the benefit of an existing direct relationship with customers and agents.</p> <p>However, it is not obvious how the new obligations would be enforced, and further changes may be necessary to create the necessary incentives to procure suitable data to allow accurate load profiling.</p>
<b>RWE Npower</b>	No	<p>The current profiling arrangements have failed to maintain an adequate sample of data and as such there is merit in reviewing the current baseline.</p> <p>We believe that Proposed Modification P223 does potentially promote efficiency in the implementation of the balancing and settlement arrangements when compared to the existing process because it should provide a method of ensuring the size and distribution of the sample is more representative. However, due to the relatively significant system development costs that would be required and the anticipated resources needed to administer the process we feel that overall the Proposed Modification does not meet applicable BSC Objective d) as it will not promote the efficient administration of the balancing and settlement arrangements. We particularly feel that the requirement to retain customers on CoS under the Proposed Modification is an inefficient and costly process which would prove to be unsuccessful.</p> <p>It is unclear at present how much more successful</p>

Respondent	Response	Rationale
		Suppliers would be than the PrA at recruiting customers and installing meters. If Suppliers encountered issues with replacing meters then the perceived benefits might fail to be achieved.
<b>Scottish &amp; Southern Energy plc</b>	No	We do not believe that this solution would achieve the Applicable BSC Objectives. We agree with the principle that better sampling would improve profiling accuracy, however there is no strong evidence that this proposal would improve efficiency. Furthermore, we do not believe that the proposed modification would facilitate the promotion of effective competition in the generation and supply of electricity.
<b>BizzEnergy Ltd</b>	Yes	The improvement in the sample size and stratification should improve the accuracy of the nhh profiles as used for settlement purposes together with a reduction in the gcf. This in turn should enable suppliers to improve the accuracy of their short term forecasts with a reduction in their financial exposure.
<b>E.ON UK Energy Services Limited</b>	Yes	We believe that the proposed modification would better facilitate the achievement of the applicable BSC Objectives. We also believe that as the role of the Profile Administrator will change that the commercial arrangements with the profile administrator are reviewed with a view to reflecting any reduction of costs for the profile administrator.
<b>EDF Energy</b>	No	<p>Majority of benefits related to this modification are based on methodology used for cost benefit analysis. We can see no evidence that allows us to categorically state that this methodology holds true and as such we feel that it is not possible to state that this modification will better facilitate BSC objectives. A Supplier will also be obliged to provide customers for PrA sample even if it cannot reach agreement with PrA regarding liability. This increases risks to a Supplier if any PrA equipment fails giving rise to a claim being made by a customer. Modification also relies on a number of existing problems being addressed, as detailed on pages 11 and 12 of assessment document. On these issues we would note:</p> <p>Data protection – has information commissioner been approached to determine if this is an issue, it could be that Suppliers are being overly cautious for no reason.</p> <p>Cold Calling – we can see that this is an issue but would question what proportion of customer are registered with TPS and if this is truly a significant problem.</p> <p>Unwillingness of customer to sign Ts&amp;Cs – although PrA will not be an issue for customer it could be for Suppliers.</p> <p>Therefore, modification is just moving issue not resolving it.</p>

Respondent	Response	Rationale
		<p>Lack of space – modification will reduce issue but not fully resolve this problem. Do we have a view on size requirements of PrA meter as opposed to current NHH meters. If space is required for communications then this could still lead to space issues.</p> <p>GSM signal – We are not aware that data is available to us that indicates customers that have an adequate GSM signal so do not see this issue as being addressed.</p> <p>Power down issues – we do not concur with statement that a customer might be more willing to allow Supplier to power down their property. A more pressing issue for a customer could be considered why should I take any time off work, either losing pay or holiday entitlement, to facilitate such a change. It could be argued that if a meter recertification was required then this could be used as a potential sampling point but then this would not be random sampling and could increase bias.</p> <p>Access issues – we do not feel that improvements in this are definite from this modification. It is noted that if a Supplier is aware of access issues then they can exclude that customer, but this again could introduce potential bias into sample.</p> <p>Diversity – we agree that modification would assist in stratifying by consumption but do not have any data to indicate that stratifying by consumption is actually required.</p> <p>Group customers – we are unsure if there is any proof that these customers do lack diversity. Even though Staffordshire County Council has agreed document suggests that this has not been used to fill gaps as bias would be seen. As such we are not sure that this issue exists</p>
<b>Centrica</b>	no	<p>This modification is overly complicated and its implementation would place a significant administrative and cost burden on participants.</p> <p>It could be argued that this modification would facilitate certain code requirements with regards to the collection of profiling data, however we do not believe that it would better facilitate the overall objectives.</p> <p>The modification does not promote efficiency in the implementation and administration of the balancing and settlement arrangements and would result in increased costs for the end customer.</p>
<b>E.ON</b>	No	We don't believe that this modification better facilitates the

Respondent	Response	Rationale
		<p>applicable BSC objectives when compared with the current arrangements. It is inefficient in view of the complex arrangements that suppliers will need to put in place to be able to track a customer through the change of supplier process and to manage the appropriate agent appointment processes.</p> <p>When you weigh the costs and benefits of the proposal against the current arrangements we don't believe it's been demonstrated that this is a better solution, but is more of a lift and shift of the problems to a party it's easier to obligate.</p>

**Question 2: Do you believe Alternative Modification P223 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline?**

**Summary**

Yes	No	Neutral/Other
7	2	1

**Responses**

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	yes	<p>P223 Alternative addresses the key issues with the Profile Sample size.</p> <p>As a result, it meets Applicable Objective C, because greater accuracy breeds certainty and confidence, which may, in turn, encourage new participants to enter the market.</p> <p>P223 Alternative also satisfies Applicable Objective D, as the increased accuracy of profiling will serve to improve the efficiency of the implementation of the Balancing and Settlement arrangements.</p>
<b>Good Energy Ltd</b>	Yes	As above
<b>British Energy</b>	Yes/No	<p>It would be inefficient to remove customers from the load sample simply because they change supplier. Such customers would be familiar with the arrangements and have suitable installed metering, in all likelihood paid for by all participants. Losing such customers and replacing them in the sample up to a year later with other customers, probably with new meters, is not efficient, and will reduce the effectiveness of the sample.</p> <p>Transfer of customers between suppliers over time may</p>

Respondent	Response	Rationale
		<p>obviously distort any initial or subsequent sample distribution between suppliers. However, this would not necessarily invalidate the sample and some flexibility is required in setting the sample, with a possibility of some suppliers having proportionally more and others less at any given time. Hopefully, natural wastage of profile customers would avoid the sample becoming overly biased toward particular suppliers over time.</p> <p>In the longer term, arrangements for 'smart meters' should be capable of being adapted for the purpose of sampling for profiles. We think it would be similarly inefficient for such meters to become redundant or be changed at every change of supplier.</p> <p>Exclusivity arrangements are mentioned in the assessment report, whereby some suppliers may have exclusive agreements with particular agents, restricting those suppliers' flexibility to take on meters installed/operated/collected by other agents, such as those installed for profile sampling. We consider that such contracts are commercial arrangements freely entered into by such suppliers, and should not be allowed to hinder the efficient operation of the BSC, which is founded on competition and choice between agents as well as between suppliers.</p> <p>On balance, we remain neutral to the alternative, unable to determine whether the potential benefit of transferring responsibility to suppliers with an existing customer relationship outweighs the potential costs of reducing the sample during the year, removing suitable installed meters from the sample and requiring new sample customers to be found unnecessarily</p>
<b>RWE Npower</b>	Qualified Yes	<p>We believe that the Alternative Modification goes some way in addressing the concerns we have with the Proposed Modification.</p> <p>By removing the requirement to retain customers on CoS there should be a reduction in the system development costs and also a reduction in the resource required to manage the process throughout the year.</p> <p>However, it is difficult to predict how much churn there might be and how this might affect the sample data. If the rate of churn is more than the estimated figure of 19% then the costs of identifying replacement customers and installing meters coupled with the inefficiencies of</p>

Respondent	Response	Rationale
		<p>stranded asset costs may outweigh the benefits of the Alternative over the Proposed Modification and ultimately the baseline.</p> <p>In addition to this and as with the Proposed we believe it is unclear how much more successful Suppliers would be than the PrA at recruiting customers and installing meters.</p> <p>Assuming the rate of churn is no greater than 19% and Suppliers encounter no unforeseen difficulties in recruiting customers then the Alternative Modification P223 should better facilitate the achievement of BSC Objective d) when compared to the existing arrangements because it would facilitate the requirement to maintain a sample that is more representative in both size and distribution.</p>
<b>Scottish &amp; Southern Energy plc</b>	No	Although the Alternative solution appears to be relatively more operationally easier to implement, we do not believe that this alternative modification would achieve the Applicable BSC Objectives for the same reasons given in response to Question 1.
<b>BizzEnergy Ltd</b>	yes	The improvement in the sample size and stratification should improve the accuracy of the nhh profiles as used for settlement purposes together with a reduction in the gcf. This in turn should enable suppliers to improve the accuracy of their short term forecasts with a reduction in their financial exposure.
<b>E.ON UK Energy Services Limited</b>	Yes	We believe that the alternative modification would better facilitate the achievement of the applicable BSC Objectives. We also believe that as the role of the Profile Administrator will change that the commercial arrangements with the profile administrator are reviewed with a view to reflecting any reduction of costs for the profile administrator.
<b>EDF Energy</b>	No	Same issues as above with the added problem that meter assets will be stranded at CoS possibly leading to additional costs and more work in recruiting customers. Just because a customer has moved between Suppliers should have no bearing on if customer should be included in PrA sample.
<b>Centrica</b>	Yes	The alternative modification would also resolve the current shortfall in the number of sample meters. The modification is a practical workable solution that

Respondent	Response	Rationale
		<p>minimises costs for suppliers and enables them to easily provide data to the PRA. The modification is flexible and gives options to fit in with the differing processes within businesses operating in the competitive market.</p> <p>This option does promote efficiency in the implementation and administration of the balancing and settlement arrangements. It provides an economic solution to the issue and many suppliers have some data already available that could be used in the sample. Suppliers could choose to operate this in a very low cost way involving small numbers of people to implement the process.</p>
<b>E.ON</b>	Yes	<p>We accept that the current profile administrator is having difficulty recruiting customers to the sample set which has knock on consequences to the profiling accuracy which isn't acceptable. We accept the argument that suppliers are better placed to manage the identification and recruitment of customers (as they have the direct relationship with the customer) and the current process where the supplier identifies candidate sites to the Profile Administrator who then attempts to recruit and then install additional equipment is not working well. Under these new proposals there will not be the same space constraints for large numbers of customers as there will be a reliance on a HH capable meter replacing the current NHH settlement metering, thus negating the space issue.</p>

**Question 3: Do you believe Alternative Modification P223 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification?**

**Summary**

Yes	No	Neutral/Other
8	2	0

**Responses**



<b>Respondent</b>	<b>Response</b>	<b>Rationale</b>
<b>Scottish Power Ltd</b>	Yes	The alternative minimises the ongoing costs of replacing lost customers in between the annual recruitment drive. This cost would be significant and difficult to justify. As such the alternative satisfies Objective D, whereas the proposed does not.
<b>Good Energy Ltd</b>	Yes	The alternative is easier to administer, and thus meets objective (d) better than the original proposal
<b>British Energy</b>	No	<p>We consider it inefficient to remove customers from the load sample simply because they change supplier. Such customers would be familiar with the arrangements and have suitable installed metering, in all likelihood paid for by all participants. Losing such customers and replacing them in the sample up to a year later with other customers, probably with new meters, is not efficient, and will reduce the effectiveness of the sample.</p> <p>Exclusivity contracts freely entered into between suppliers and their agents should not be allowed to create obstacles to the efficient operation of the BSC by restricting the ability of customers to change supplier while remaining in the profile sample, particularly while BSC parties bear the cost of sample profile meters which become largely redundant.</p>
<b>RWE Npower</b>	Qualified Yes	<p>As outlined in our response to Q2 without knowing exactly what the churn rates will be it is difficult to state with any degree of certainty whether the Alternative Modification P223 better facilitates the BSC Objectives when compared to the Proposed Modification P223. Assuming that the churn rate will be 19% then the costs of finding replacement customers should be lower than the costs that Suppliers would incur in implementing processes to retain customers in the sample on CoS.</p> <p>If this is the case then the Alternative P223 will better facilitate the achievement of BSC Objective d) than the Proposed Modification P223 as it will be more efficient in both the implementation and administration of the balancing and settlement arrangements</p>
<b>Scottish &amp; Southern Energy plc</b>	No	We do not believe that this alternative modification would achieve the Applicable BSC Objectives for the same reasons given in response to Question 1. It appears to be easier to administer but will be less efficient as the process is longer.
<b>BizzEnergy Ltd</b>	Yes	It would appear to remove a layer of complexity that

Respondent	Response	Rationale
		larger suppliers would have in tracking any sample customers that change supplier.
<b>E.ON UK Energy Services Limited</b>	Yes	The alternative solution should be less likely to cause an issue during the COS process.
<b>EDF Energy</b>	No	We feel that more work is required under this modification as a CoS event means that more customers have to be sampled and meters fitted. This just seems to be inefficient and not cost effective as just because customer has changed Supplier it does not necessarily mean that customer should no longer be available for PrA sample.
<b>Centrica</b>	Yes	Yes, the alternative modification addresses all of the issues around sample selection whilst having none of the implementation and administrative difficulties associated with the original proposal.
<b>E.ON</b>	Yes	By retiring the transferring customer from the sample and replacing the customer at the same time as other customers are being retired/recruited annually to the sample set may have some short term increase in costs for meter installations and so increase the central costs for this work, we believe that as more and more smart meters are installed, there will not be a need to replace as many meters for sampling purposes and so the costs of system changes and operational processes of tracking customers will outweigh the central costs for replacing meters, making the alternative a more efficient process in the longer term.

**Question 4: Do you support the Modification Group's proposed Implementation Dates of:**

- **1 December 2009 if P223 is approved before the end of November 2008; or**
- **1 April 2010 if P223 is approved between December 2008 and the end of March 2009.**

**Note that both dates would be provided to Ofgem but that the Group has a preference for the earlier date.**

**An explanation of the proposed dates can be found in Section 3 of the consultation document.**

**Summary**

Yes	No	Neutral/Other
6	2	2

## Responses

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	Yes	ScottishPower is satisfied that the earlier of the proposed implementation dates is reasonably achievable. We echo the Modification Group's preference for an early implementation date, given the potential adverse impact on the accuracy of profiling were the sample size allowed to continue shrinking at the present rate.
<b>Good Energy Ltd</b>	No	<p>Given the deterioration in profiles we believe an earlier date would be preferable. If implemented in 2010, then the profile data accuracy will continue to deteriorate until 2012, when profiles using the new data will be used. It may be 2015 before the accuracy of the data is restored.</p> <p>We believe the final report should show an estimate of when the accuracy of the profiles would be considered fit for purpose using the dates proposed.</p>
<b>British Energy</b>	Yes	At least 1 year's notice to make system and process changes.
<b>RWE Npower</b>	Yes	<p>If either Modification is approved we do support the Group's proposed implementation dates.</p> <p>Whilst we believe it would be preferable for the new process to begin at the same time as the start of the new contract (1 April 2010) this would result in the customer recruitment requests not being sent out to Suppliers until 1 January 2011. This would delay the perceived benefits of improved profiling accuracy.</p> <p>We believe we should be in a position to implement the new process within 12 months from an Authority decision and therefore feel that a 1 December 2009 implementation date, if the Authority approves P223 before the end of November 2008, is a suitable implementation date.</p>
<b>Scottish &amp; Southern Energy plc</b>	Yes	-
<b>BizzEnergy Ltd</b>	Yes	-
<b>E.ON UK Energy Services Limited</b>	Yes/no	No preference on implementation dates as we currently have systems and processes in place that allow us to supply interval (Half Hourly) to the associated supplier.
<b>EDF Energy</b>	No	We have previously stated that a 2 year lead time is required. We would have a number of changes to make on systems where significant internal work is being undertaken. As we are unconvinced that this

Respondent	Response	Rationale
		modification is worthwhile we would not wish to jeopardise our current work plans to include development for this modification.
<b>Centrica</b>	Yes	The lead time is sufficient for suppliers to develop a processes to meet the objectives and ensure that this process is tested.  The earlier date is preferable as the data being fed into the deeming mechanism does not meet the requirements signed onto by all suppliers. The net result is that there is low confidence in the accuracy of the volumes being deemed to suppliers in the market.
<b>E.ON</b>	Yes / No	

**Question 5: The Modification Group has identified potential benefits of P223 to Suppliers in the region of £2.3m - £12.1m, resulting from improved profiling accuracy and thereby reduced imbalance exposure. An explanation of these benefits can be found in Section 5 / Appendix 6 of the consultation document. Do you agree that these benefits would be realised?**

#### Summary

Yes	No	Neutral/Other
4	2	4

#### Responses

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	Qualified Yes	ScottishPower agrees with the rationale used in identifying the potential benefit, although it is difficult to comment on the accuracy of the estimates given in the consultation.  Nonetheless, we hold the view that improved profiling will deliver significant benefits in the form of a reduction imbalance charges. However we should recognise that it is not only profiling that creates GCF values not equal to 1 and that the risk of imbalance will remain even after the implementation of P223.
<b>Good Energy Ltd</b>	No	No comment as we have not checked the analysis.
<b>British Energy</b>	Yes/no	-

Respondent	Response	Rationale
<b>RWE Npower</b>	Maybe	<p>We do accept that more representative sampling data should have a positive impact on the accuracy of the profiling data.</p> <p>It has proved very difficult for both the Group and Elexon to accurately quantify the benefits. As a Supplier we have found it difficult to assess particularly our operational costs (at present it is difficult to assess how much resource will be required to administer either the Proposed or Alternative processes) and subsequently equally difficult to quantify any benefits.</p> <p>We acknowledge the difficulty involved in modelling the benefits and have found the analysis helpful in understanding the potential impact of error in the profiling sample.</p> <p>We acknowledge that a number of assumptions were necessary in order to produce any modelling however we believe that so many assumptions have been built into the model it is very hard to know the magnitude of the improvements that may be seen in the profiling data/reduced imbalance exposure.</p> <p>We are unsure of the strength of the relationship that is suggested exists between the sampling error and the regression error, and also between the regression error and the GSPGCFs. Consequently we believe the calculations possibly over-state the benefits of improving the sampling data.</p>
<b>Scottish &amp; Southern Energy plc</b>	No	This assumes that better profiling would lead to a more accurate forecast and hence reduce imbalance exposure. It doesn't follow that better profiling means better forecasting.
<b>BizzEnergy Ltd</b>	Yes	-
<b>E.ON UK Energy Services Limited</b>	Yes/no	-
<b>EDF Energy</b>	No	<p>There are several assumption made in order to provide these estimates. Majority of these cannot be tested to determine if they are robust and have a high likelihood of being achieved. A key requirement is that reducing volatility in Group Correction Factor will always lead to decreased costs for Suppliers. We must have historic data that will either prove or disprove this statement but t his does not seem to have been referenced in this work.</p> <p>Section 5 of cost benefit analysis seems to use random errors in demand to show that errors arise and how they impact regression analysis and errors. We can see nothing in this document that explains what errors this type of</p>

Respondent	Response	Rationale
		approach might introduce and if they are of an order of magnitude that will significantly impact on likelihood of savings being made.
<b>Centrica</b>	Yes	It is difficult to model the true effect on costs in this area without re calculating the historical settlement runs. The benefits produced indicate wide ranging scenarios and make use of the data available to work up the benefits.  The real benefit is that the industry will have confidence that each supplier is being accurately deemed for the energy they are responsible for consuming.
<b>E.ON</b>	No	It isn't proved that this modification alone will deliver these benefits or improved profiling accuracy, but what it will do is assist the recruitment of sites into the sample.  One of the reasons cited by the Profile Administrator for their inability to determine the accuracy of the profiles is the lack of sites in the sample, so the benefits of this modification is the improvements of the sample set which will then determine how accurate/inaccurate profiles are and what that means for suppliers and their imbalance exposure.

**Question 6: The Modification Group has not identified any conflict between the P223 solution and any future national smart metering rollout. An explanation of the Group's view can be found in Section 6 of the consultation document. Do you agree with this view?**

#### Summary

Yes	No	Neutral/Other
9	0	1

#### Responses

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	Yes	At the present time, ScottishPower does not consider the implementation of these proposals to be incompatible with the principles of a national rollout of smart meters.  However it is worth nothing that in accepting the implementation dates and the natural lag in applying more accurate profiling the industry is likely to be further

Respondent	Response	Rationale
		advanced in applying smart metering data in settlements.
<b>Good Energy Ltd</b>	Yes	-
<b>British Energy</b>	Yes/No	-
<b>RWE Npower</b>	Yes	At present we are unable to identify any conflict between the P223 solutions (Proposed and Alternative) and any future national smart metering rollout.
<b>Scottish &amp; Southern Energy plc</b>	Yes	-
<b>BizzEnergy Ltd</b>	Yes	-
<b>E.ON UK Energy Services Limited</b>	Yes	The changes to industry processes currently under discussion to allow efficient use of smart metering should reflect these requirements
<b>EDF Energy</b>		We do not see any relationship between smart meters and this modification. If a smart meter is installed at a property then we feel that this could be used in PrA sample and it is likely that such an inclusion can be done without need to disturb customer.
<b>Centrica</b>	Yes	Future roll out of smart meters may assist participants in the industry in more easily obtaining the data required of them. The alternative modification gives flexibility and so should not cause any material impact on future modifications.
<b>E.ON</b>	Yes	-

**Question 7: Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered under the scope of P223?**

**Summary**

Yes	No	Neutral/Other
3	6	1

**Responses**

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	Yes	ScottishPower is disappointed that our proposed solution

Respondent	Response	Rationale
		detailed in the last consultation was not developed further. This solution minimised operational costs while also maintaining the sample size without the need for ongoing recruitment. While the alternative modification is better than the baseline we feel that the industry has missed an opportunity to implement a yet more efficient process.
<b>Good Energy Ltd</b>	No	-
<b>British Energy</b>	Yes/no	
<b>RWE Npower</b>	No	
<b>Scottish &amp; Southern Energy plc</b>	Yes	By ensuring that PrA operates more efficiently based on current arrangements.
<b>BizzEnergy Ltd</b>	No	-
<b>E.ON UK Energy Services Limited</b>	No	-
<b>EDF Energy</b>	Yes	Mandate use of PrA agents for all customers in sample. Set-up a new participant id for use by PrA's agents and ensure that these agents are used. This will then indicate to a Supplier if they are winning a PrA customer and can act accordingly. This should ensure that customers are not lost on CoS reducing need for sample boosting
<b>Centrica</b>	No	More time was given by the panel to review the modification and the alternative. Many options were debated openly and honestly to reach this consensus.
<b>E.ON</b>	No	<p>On the face of things you would argue that this modification moves the obligations from the service provider to the supplier and that this is merely a lift and shift of the obligation because the current service provider has failed to deliver against it's contract. However, we accept that Elexon and the Profiling Expert Group have done what is necessary to try and improve the performance under the current arrangements and that it is not a failure for the want of trying and a different approach is required.</p> <p>In the longer term the implementation of Smart metering would likely make this a more sensible solution.</p>

**Question 8: Does P223 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?**



## Summary

Yes	No	Neutral/Other
2	7	1

## Responses

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	No	-
<b>Good Energy Ltd</b>	Yes	The group should consider when the accuracy of the data will "fit for Purpose" under present timescales.
<b>British Energy</b>	Yes/no	-
<b>RWE Npower</b>	No	-
<b>Scottish &amp; Southern Energy plc</b>	No	-
<b>BizzEnergy Ltd</b>	No	-
<b>E.ON UK Energy Services Limited</b>	No	-
<b>EDF Energy</b>	Yes	Although mentioned in section 7.7 we feel that main issue is with regard to liability if meter fitted for PrA purposes causes damage. We feel that PrA should take full liability for such cases but there is no obligation for PrA to have any liability for damage. They can just refuse any such request from a Supplier but a Supplier will still be obliged under BSC to put forward customers to be included in PrA sample. We feel that in majority of cases as a Supplier we will have little option but to use PrA agents as many of our NHH agents do not have facilities to collect HH readings and do not want to spend money to do so for such a small customer base.
<b>Centrica</b>	No	-
<b>E.ON</b>	No	-

## Question 9: Are there any further comments on P223 that you wish to make?

Respondent	Response	Rationale
<b>Scottish Power Ltd</b>	No	-

<b>Respondent</b>	<b>Response</b>	<b>Rationale</b>
<b>Good Energy Ltd</b>	No	-
<b>British Energy</b>	Yes	Could suppliers more actively advise customers and seek volunteers for introduction to the Profile Administrator on behalf of the PA under the existing arrangements? Many customers may be willing to participate but simply be unaware of the organisations and process involved.
<b>RWE Npower</b>	No	-
<b>Scottish &amp; Southern Energy plc</b>	Yes	As smarter meters get installed, better sampling without having to make changes to the process will happen naturally. Technology is making life for the PrA easier.
<b>BizzEnergy Ltd</b>	No	-
<b>E.ON UK Energy Services Limited</b>	No	-
<b>EDF Energy</b>	No	-
<b>Centrica</b>	No	-
<b>E.ON</b>	No	-