## **Responses for CPC00559**

Detailed Level Impact Assessment of P198

'Introduction of a Zonal Transmission Losses Scheme'

Carried out by	Comments		
Michelle Derbyshire	No impact upon UUNL MOP		
United Utilities			
Allen Gerber	Would the Proposed Modification as outlined in the attached Requirements Specification impact your organisation?		
E.On UK Plc	Νο		
	If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)		
	Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Setttlement.		
	Lead time would be minimal (if any)		
	Any other comments?		

Sue Macklin Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro- Electric Power Distribution Ltd; Medway Power Ltd;	<ol> <li>Would the Proposed Modification, as outlined in the attached Requirements Specification, impact your organisation? Yes</li> <li>If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)</li> <li>We would need to make changes to our systems and processes (confidential cost information removed)</li> <li>Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement</li> <li>Absolute minimum lead time 3 months. We would prefer 6 months.</li> </ol>
	4. Any other comments: <b>No</b>
Alastair Barnsley Energy Services Metering	<ol> <li>Would the Proposed Modification, as outlined in the attached Requirements Specification, impact your organisation? No</li> <li>If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)</li> <li>Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement</li> <li>Any other comments:</li> </ol>

	These cost estimates are based on a version of P198 with TLFs allocated annually on a GSP Group basis; any more complex scheme would see costs increase dramatically.
	4. Any other comments:
	<ol> <li>Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement</li> </ol>
	Many systems are compliant with zonal losses on a GSP Group level but would still need to be tested. Other systems and operational spreadsheets would need to be upgraded. The total cost of this is in the region of £150k - £200k and would take at least three months.
	2. If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)
Dave Morton	1. Would the Proposed Modification, as outlined in the attached Requirements Specification, impact your organisation? Yes

Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	<ul> <li>If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)</li> <li>P198 will impact ScottishPower's internal settlement, demand forecast and portfolio scheduling systems. There are also some impact on a number of satellite contracts and trading systems. Some extensive integration and testing would also be necessary.</li> </ul>
	<ul> <li>ScottishPower estimate the costs to be in the region of £200,000.</li> <li>Estimated notice required to implement all stages in lifecycle including testing into implementation is minimum 8 months.</li> </ul>
SP Distribution Ltd.	<ol> <li>Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement</li> </ol>
	With the nature of contract negotiation/renegotiation, ScottishPower require a minimum of 3 months lead time (prior to their effective date), such that the values could be built into the pricing models.
	4. Any other comments:
	ScottishPower would also highlight that the notice required for implementation should be from the date of definitive decision for implementation (i.e. after all the appeals if applicable), as P82 experience showed that unnecessary costs were expended by the industry as a result of that process.

Jane Larner Npower Limited, Npower	1.	Would the Proposed Modification, as outlined in the attached Requirements Specification, impact your organisation? Yes
Yorkshire Limited, Npower Yorkshire Supply Limited,	2.	If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale)
Npower Northern Limited,		Confidential information removed
Npower Northern Supply Limited, and Npower Direct Limited	3.	Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement
		At least 6 months from the date the changes have been agreed [ELEXON has subsequently clarified that this lead time relates to the development of necessary system changes rather than TLF publication]
	4.	Any other comments:
Louise Allport British Energy Power &	1.	Would the Proposed Modification, as outlined in the attached Requirements Specification, impact your organisation? Yes
Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, Eggborough Power Ltd, British Energy Generation	2.	If yes, please provide a description of the impact, any costs which would be incurred, and the required development timescales (with supporting rationale). Systems impact: - We estimate a requirement of between 3 and 6 months to specify, document, modify and test all systems and processes associated with pricing, reporting and validating energy generated, consumed and traded. We have not yet costed the details, but the changes are likely to affect many areas of generation, supply and trading, and are likely to be significant, measured in at least 6 figures.
(UK) Ltd	3.	Please indicate, with supporting rationale, the lead time (if any) which your organisation would require between the publication of the P198 TLF values and their implementation in Settlement – A notice period of at least 6 months would allow factors to be efficiently priced into the second half of 1 year contracts starting midway between 'TLF periods'. For example, if TLFs were known in September for the following April they could be taken into account for 1 year contracts starting in October. If not known until October, they would have to be estimated in contracts for the following April.
	4.	Any other comments: <b>None at this time.</b>