

## **Responses for CPC00557**

### Second Detailed Level Impact Assessment of P196

#### Treatment of Long Term Vacant Sites in Settlements

<b>Carried out by</b>	<b>Comments</b>
Michelle Derbyshire <b>United Utilities</b>	No impact upon UUNL MOP
Graham Smith <b>Western Power Distribution</b>	<p>1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?</p> <p>No interest to LDSO</p> <p>2. If the use of the D0052 was mandated, what would be the impact on your organisation?</p> <p>No impact on LDAO</p> <p>3. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?</p> <p>No. We can not identify any requirement for us to have this information.</p> <p>4. Any other comments:</p> <p>None</p>

Jenny Green  
**IMServ Europe Ltd**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

We believe the NHHDC should be informed of a Long Term Vacant site via a D0052. We believe the use of the flow should be mandatory.

2. If the use of the D0052 was mandated, what would be the impact on your organisation?

The impact on our system would be that a code change will be required to the NHHDC system to be able to accept the proposed new Measurement Class code, also there will be changes required to the D0310 validation process. We would require at least 3 months to carry out the code changes

3. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

Yes, we believe that is must be in everyone's interest to know which sites suppliers believe this 'situation' applies to.

4. Any other comments:

We are unclear on the CoS process and what is expected of the NHHDC. The old NHHDC will send measurement class 'V' and the effective to date in the D0152 to the new NHHDC – should the new NHHDC "ignore" this and start again with MC "A"? Please can this be looked at and explained in more detail?

Alastair Barnsley  
**Metering Services**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

Metering Services believe that the NHHDC should be informed that a site is LTV Via a D0052 flow rather than by a manual process as the use of the D0052 will remove the need for manual intervention with it's associated risks. Metering Services that if the LTV status is to be invoked it should be mandatory to use the D0052 Flow in order to avoid the costs and uncertainties associated with operating multiple different processes for multiple suppliers.

2. If the use of the D0052 was mandated, what would be the impact on your organisation?

If the use of the D0052 flow was mandatory the impact on Metering services would be limited to the increase in batch processing associated with the additional D0052 Flows.

3. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

Metering Services believe that the reporting of LTV sites by suppliers to LDSOs would ensure consistency of data held within the industry.

4. Any other comments: None

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;**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

The method of notifying the NHHDC should be determined by the Supplier and managed via contractual arrangements with their NHHDC.

If the use of the D0052 was mandated, what would be the impact on your organisation?

Confidential.

2. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

No

3. Any other comments:

Page 4 – 2<sup>nd</sup> bullet point under 'NOTED' states that this would be optional for Suppliers which suggests that it would be mandatory for other participants. It is not within the remit of the BSC to place mandatory requirements on Party Agents as they are not signatories to the BSC.

Part of the solution (page 10 2.7.2) is for the NHHDC to take the last actual meter reading and use the corresponding EAC to deem a reading before the date of the start of the Long Term Vacant Period (this is where there is no meter reading for the start of the long term vacancy). I wasn't aware the EAC/AA system could calculate a deemed read from a meter reading and an EAC. As I understand it the EAC/AA system either uses an EAC with the corresponding DPCs (automated process) or, via the manual interface, two meter readings (and the DPCs). Has the additional work for making enhancements to EAC/AA been taken into account?

Man Kwong Liu  
**SAIC Ltd**  
**Scottish Power UK plc**  
**ScottishPower Energy**  
**Management Ltd.**  
**ScottishPower Generation**  
**Ltd.**  
**ScottishPower Energy Retail**  
**Ltd.**  
**SP Manweb plc.**  
**SP Transmission Ltd.**  
**SP Distribution Ltd.**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

Yes. Although we believe the decision to use the processes proposed by P196 and the suggested Alternatives should remain optional for Suppliers, we believe that where a Supplier chooses to use the facility, it should be obliged to follow the process in all respects and with particular regard to those relating to reporting requirements. However, the use of the D0052 should remain as electronic or as otherwise agreed. This would be consistent with the use of the flow in other contexts.

2. If the use of the D0052 was mandated, what would be the impact on your organisation?

This would require new processes for both our Supply and NHHDC businesses, with commensurate system enhancements where electronic data flows were anticipated.

3. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

Yes, It would seem reasonable to advise the relevant LDSO and MPAS where a site is determined to be Long Term Vacant. However, with the Proposed Modification, this is unlikely to represent a contemporary picture of the position at the site; rather it would merely be a snapshot depicting the position at the time that such determination was made. The same would be true of Alternative Modification Option 1. However, it is a cornerstone of Alternative Modification Option 2 that the MPAS will be informed, using existing industry data flows and mechanisms, of any subsequent updates. Therefore, the LDSO is being given full visibility of which sites are being treated as LTV.

4. Any other comments:

Yes, The Issue 14 Group concluded that the treatment of Long Term Vacant Sites was leading to inequitable Settlements and distorting Supplier performance and increasing the level of error in the market. Given the present concerns about the qualified audit and the level of Settlement error, we consider the current position unacceptable. While it is clear that these proposals will not address all of the issues that might lead to Supplier exaggerating their consumption (we certainly do not consider them in any way to be a panacea) it is clear that this issue presents a very significant contributing factor. It is, therefore, our view that by implementing these proposals, and addressing this particular issue, the industry will be taking a major step forward.

Jenn Tipple  
**Siemens Energy Services Ltd**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

We believe that the D0052 should be used for this process as it will provide an audit trail. We also believe that this should be a mandatory requirement as if it were optional, there is greater scope for error.

2. If the use of the D0052 was mandated, what would be the impact on your organisation?

There would be an increase in the number of D0052 flows received and exceptions. The D52 option would require further systems changes, so would incur additional development and testing cost, and increase the lead-time for implementation.

3. Do you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

No comment as party agent.

4. Any other comments:

Sandy Crump  
**E.ON UK**

1. Do you believe that under the Proposed Modification, that the NHHDC should be informed that a site is Long Term Vacant via the D0052 or by a manual process? Please also comment on whether you believe the use of a flow or a manual process should remain optional and down to the Supplier?

Our preference is for keeping all the flows within the DTN. Manual processes are subject to error. This is the best way forward as it ensures a consistent approach across the industry. If the D052 flow can be easily amended to reflect the LTV sites' status then it should be used. If a supplier wishes to take advantage of the LTV process they should use an easily auditable process and DCs should not have to deal with different processes from different suppliers, complicating the process. Anything different would cause confusion and would be an audit nightmare. An example of this is the Unmetered Supplies process. It should be mandatory to use the D0052 flow (if this is the preferred optimum solution) in order to avoid the costs and uncertainties associated with operating different processes for different suppliers.

2. If the use of the D0052 was mandated, what would be the impact on your organisation?

There will be some process changes and IS support requirements – but better to do this than to have differing and unclear manual processes.

3. DO you believe that the proposed reporting of Long Term Vacant sites by Suppliers to LDSOs is necessary?

~~4.~~We do not see the value of this. There would also be an administrative and financial burden to maintain the report and ensuring it gets sent to LDSOs on a regular basis.