

Issue	Description	Response
	2.1 Registration of the Notified Energy Contract Capacity	
ISSUE 1	Please provide an impact assessment in respect of implementing the banded approach for registering the Notified Energy Contract Capacity, and for implementing just an upper (in absolute terms) limit on the Notified Energy Contract Capacity. Where a banded approach is adopted, would enabling the band to be set with both values having the same sign (i.e. both values are positive, or both are negative) cause any issues?	In terms of registering NECC values, there are not expected to be significant differences in impact between implementing a banded approach or a single 'upper-limit'. However, there are differences in the application of the NECC values in ECVAA (see ISSUE 4).
ISSUE 2	Please indicate whether there are any system or process constraints that should be taken into consideration if this solution is to be progressed further (i.e. where the solution is effected by the constraint).	<p>If application of NECC values (in ECVAA) is to be automated, then the following considerations apply to registration:</p> <ul style="list-style-type: none"> • NECC values registered in CRA will need to be transferred to ECVAA via a new CRA report / ECVAA loader. • NECC values registered manually in CRA would not be available for use by ECVAA until the next day (it is envisaged that the values would be transferred to ECVAA as part of the CRA Daily report). • If NECC values registered automatically are to take affect immediately (i.e. as close to Gate Closure as possible), then confirmation of the registration will need to be immediate, via a new confirmation report, and the accepted values will need to be transferred to ECVAA immediately (via a new CRA report). This potentially large volume of traffic could be reduced by registering NECC values in ECVAA rather than CRA.
ISSUE 3	Please indicate whether there are any volumetric constraints on the receipt of automated reports for amending the Notified Energy Contract Capacity, and whether these constraints have an incremental impact on the development and implementation costs, or the operational / maintenance costs.	If amended NECC values are to take affect immediately, then traffic volumes will increase significantly (see ISSUE 2).
	2.2 On Receipt of Notifications	
ISSUE 4	Please indicate whether there are any system or process	Initial assessment suggests that the additional processing required by the

	constraints that should be taken into consideration if this solution is to be progressed further (i.e. where the solution is effected by the constraint).	<p>notification loaders would require an upgrade to the existing system hardware, if current performance levels are to be maintained. A doubling of processor capacity is anticipated, with associated costs.</p> <p>There are difficulties with the banded approach which need to be resolved. For example, if a Party's starting position for a Settlement Period is outside the band, and the first notification they submit for the period still leaves them outside the band, should this notification be rejected? It may be that warning and / or rejections should only occur if a notification moves the Party from a position within the band, to a position outside the band, but this would require ECVAA to compare the new position to the previous position. It is anticipated that the banded approach would have a greater impact, and incur greater development costs than the single 'upper-limit' approach, whatever the implementation.</p> <p>Another issue is the parallel processing of notifications. In the current system configuration, it is possible for notifications involving a particular counter-party (submitted by different Agents) to be processed in parallel. Under P147, it would be necessary to process these notification sequentially, in order to raise warnings / reject notifications correctly.</p>
ISSUE 5	Please indicate whether there are any constraints on how far forward the Notified Energy Contract Capacity can be checked, and whether these constraints have an incremental impact on the development and implementation costs, or the operational / maintenance costs.	<p>The first period which can be checked is the first period for which Gate Closure has not passed (i.e. $j+3$, where 'j' is the current period). No constraints have been identified on how far forward the check could be performed, other than performance constraints.</p> <p>The performance impact on the notification loaders would, to a first approximation, rise proportionately with each additional Settlement Period that is checked.</p>
ISSUE 6	Please indicate any additional development and implementation costs, and operational and maintenance costs incurred where this process is applied additionally to dual notifications.	No significant additional costs are anticipated.
	2.3 At Gate Closure	
ISSUE 7	Please indicate whether there are any system or process	The proposed solution would increase the processing time of the half-hourly

	constraints that should be taken into consideration if this solution is to be progressed further (i.e. where the solution is effected by the constraint).	Credit Check. Since the Credit Check process suspends the notification loaders whilst it is running, there will be a significant impact on performance levels.
ISSUE 8	Please indicate whether there is an incremental cost incurred for looking at Settlement Period further out than j+3.	To check a Settlement Period other than j+3 would require the Credit Check process to repeat its aggregation processing for the new period. A single development cost would be incurred for looking at any Period other than j+3. There would be a significant impact on performance levels.
ISSUE 9	Please indicate whether there is an incremental cost incurred for looking at multiple Settlement Periods.	To check multiple Settlement Periods would require the Credit Check process to repeat its aggregation process for each new period. A single development cost would be incurred regardless of the number of periods checked, but the impact on performance levels would, to a first approximation, rise proportionately with each additional Settlement Period that was checked.
ISSUE 10	Please provide any additional development and implementation costs (and operational and maintenance costs) from adopting a profiled approach to checking; For example, Any check performed between 09:00 and 15:00 on any operational day checks Settlement j+3; Any check performed on or after 15:00 on a weekday other than Friday checks all Settlement Periods through to 10:30 the following day; and Any check performed outside of these time periods, checks all Settlement Periods for three calendar days forwards.	New ECVAA Form to view/edit profile. Credit Check process would need additional processing to handle the profile data. Main impact would be on performance levels (see ISSUE 9).
	2.4 Other Issues for Consideration	
ISSUE 11	It is assumed that the Trading disputes / Query rectification process will utilise a similar process to the ECVAA System failure recovery process and that this does not impact the BSC Central Service Agent, or incur additional operational costs. Please confirm.	Confirmed.
ISSUE 12	Please provide an impact assessment in relation to the inclusion of the fixed volume parts of MVRNs in this process, and provide an indication of how this could be achieved.	The impact assessment considers ECVNs only. MVRNs could be included in the Gate Closure check relatively easily, since the Credit Check process already looks at these for period j+3. To perform the

		<p>check on any other period would require Credit Check to perform additional processing, with significant impact on performance levels.</p> <p>For the NECC check on receipt of notifications, both the ECVN and MVRN loaders would need to be modified to look at the corresponding MVRN / ECVN position. This would have a significant impact on performance, and would also introduce dependencies between the loading of ECVNs and MVRNs.</p>
ISSUE 13	Please indicate any additional development and implementation costs, and operational and maintenance costs incurred where this process is applied at counterparty level, rather than Energy Account level (i.e. the check is performed against the Counter	<p>No significant additional costs are anticipated for the Gate Closure Check.</p> <p>For the application of NECC levels on receipt of notifications, it is anticipated that the performance impact would be even greater than that described above (ISSUE 4).</p>
	3.1 Manual Post Event Rectification	
ISSUE 14	It is assumed that manual rectification process will utilise a similar process to the ECVAA System Failure recovery process and that this does not impact the processes / systems of the BSC Central Service Agent. Please confirm.	Confirmed.
ISSUE 15	Please provide the operational and maintenance costs associated with such a rectifications process (for clarity, based on the assumption that it will be only a very small number of notifications and Settlement Periods (say maximum 6) requiring rectification).	Provided.
	3.2 Time Constrained Notification Submission	
ISSUE 16	Please indicate whether there are any system or process constraints that should be taken into consideration if this solution is to be progressed further (i.e. where the solution is effected by the constraint).	The notification loaders would have to perform additional processing which would impact performance levels.
ISSUE 17	Please provide an impact assessment of both options, 1 and 2 above.	Provided.