



April 2003

ASSESSMENT REPORT
MODIFICATION PROPOSAL P116 –
Changes to Allow Line Loss Factor Data
from BSC Website to be Used in
Settlement

Prepared by the Volume Allocation Standing
Modification Group on behalf of the Balancing and
Settlement Code Panel

| | |
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I DOCUMENT CONTROL

a Authorities

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| 0.1 | 28/03/2003 | Change Delivery | Initial Review |
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b Distribution

| Name | Organisation |
|---|--------------|
| Each BSC Party | Various |
| Each BSC Agent | Various |
| The Gas and Electricity Markets Authority | Ofgem |
| Each BSC Panel Member | Various |
| energywatch | energywatch |
| Core Industry Document Owners | Various |

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1 SUMMARY AND RECOMMENDATIONS

1.1 Recommendations

On the basis of the analysis, consultation and assessment undertaken in respect of Modification Proposal P116 during the Assessment Procedure, the Volume Allocation Standing Modification Group (VASMG) invites the BSC Panel to:

- (a) AGREE that the Proposed Modification P116 should be made;**
- (b) AGREE an Implementation Date for the Proposed Modification P116 of 27 November 2003 if an Authority Decision is received by 10 July 2003 and 26 February 2004 if an Authority Decision is received after 10 July 2003 but before 11 September 2003;**
- (c) AGREE that Modification Proposal P116 be submitted to the Report Phase in accordance with Section F2.7 of the Code; and**
- (d) AGREE that the draft Modification Report be issued for consultation and submitted to the Panel Meeting on 8 May 2003.**

The rationale for the recommendations is summarised in Section 1.3.

1.2 Background

Modification Proposal P116 'Changes to Allow Line Loss Factor Data from BSC Website to be Used in Settlement' (P116) was submitted on 6 January 2003 by East Midlands Electricity Distribution plc. P116 seeks to amend provisions in Section S of the Balancing and Settlement Code (the Code) concerning how Half Hourly Data Aggregators (HHDA) obtain the Line Loss Factor (LLF) data to be used in Settlement. Currently, the Code requires HHDA to use LLF data provided directly by the Public Distribution System Operators¹ (PDSO). LLF data is currently sent by the PDSOs via the Line Loss Factor Data File (the D0265 data flow over the Data Transfer Network or a D0265 file sent by e-mail), as well as being reported on the BSC Website. P116 seeks:

- (i) to allow LLF data from the BSC Website to be used in Settlement; and
- (ii) to remove the obligation on PDSOs to send LLF data individually to the relevant BSC Parties and Party Agents.

1.3 Rationale for Recommendations

P116 was assessed against BSC Objectives (c) and (d) as set out in paragraph 3 of Condition C3 of the Transmission Licence:

- (c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity; and
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

¹ It should be noted that Modification Proposal P62 has been approved by the Authority. As a result, the new term 'Licensed Distribution System Operator' (LDSO) will replace 'Public Distribution System Operator' (PDSO) after 1 August 2003 for all purposes relevant to P116.

During the first VASMG meeting on 29 January 2003, ELEXON circulated a Briefing Note² which had been presented to the Panel on 14 March 2002 and which sought to clarify the scope of Applicable BSC Objectives (c) and (d). The Briefing Note suggested that it is appropriate for the Panel to interpret BSC Objective (d) in a narrow sense, i.e., as being concerned with costs and risks incurred by ELEXON and BSC Agents. The Briefing Note also suggested that it is appropriate for the Panel to interpret BSC Objective (c) in a wider sense, so as to consider the effects of costs and benefits on different industry participants. The Briefing Note explicitly stated that the Panel could consider whether or not reduced costs for PDSOs might end up promoting competition in generation, supply, sale or purchase of electricity whilst also recognising that this is not a straight-forward issue.

A majority of VASMG members believed that P116 would better facilitate BSC Objective (d). Part of the rationale for this was that P116 would improve efficiency in the implementation of the settlement arrangements by providing a centralised facility for the dissemination of LLF data which is used in Settlement. Moreover, it was argued that BSC Objective (d) would be better facilitated because P116 would improve the integrity of Settlement by eliminating a potential source of error.

A number of VASMG members, including the Proposer, felt that P116 would also better facilitate the achievement of BSC Objective (c) on the basis that any cost savings to PDSOs would be passed on to Suppliers in a competitive environment. Furthermore, it was argued that all industry participants would benefit from simplifying³ and centralising the dissemination of LLF data. The Proposer also suggested that P116 would remove an unnecessary constraint on the business processes operated by the HHDA's, and would thereby promote efficiency and competition in the supply of electricity. However, some Modification Group members doubted whether any cost savings accruing to PDSOs as a result of P116 would actually be passed on to Suppliers and ultimately to their customers. These members also doubted whether the long term benefits to HHDA's and Suppliers were sufficient to justify the one-off cost of modifying their existing systems. These members emphasised that it would be difficult to conduct a realistic cost-benefit analysis for the whole industry on the basis of the information provided by respondents to the Impact Assessment and consultation questionnaire. It was felt that any benefits resulting from P116 would be mainly related to the (un-quantified) efficiency and convenience of having a centralised process for the publication of LLF data rather than on specific cost savings to PDSOs or the cost of a one-off systems change by some BSC Parties and Party Agents.

The VASMG decided (majority) that P116 should be justified on the basis of BSC Objective (d), as it was not possible to agree that P116 would have a major impact on the better achievement of BSC Objective (c). The Implementation Date was chosen so as to ensure that P116 would be in place for the annual publication of LLF data for the 2004-2005 BSC Year.

2 INTRODUCTION

This Report has been prepared by ELEXON Ltd., on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the BSC.

An electronic copy of this document can be found on the BSC website, at <http://www.elexon.co.uk>

² This Briefing Note is referenced in Minute 35 for Panel Meeting 41. The Minutes for all Panel meetings are available on the BSC Website.

³ The VASMG noted that the zipped files on the BSC Website are of minimal size and that download times are very short.

3 MODIFICATION GROUP DETAILS

This Assessment Report has been prepared by the VASMG. The Membership of the Modification Group was as follows:

| Member | Organisation |
|------------------|--------------------------------|
| Mike Downing | ELEXON (Chairman) |
| Emrah Cevik | ELEXON (Lead Analyst for P116) |
| Afroze Miah | PowerGen |
| Andrew Latham | Centrica |
| Andrew Neves | East Midlands |
| Brian Nichol | Northern Electric |
| Chris Pooley | Campbell Carr |
| Clare Talbot | National Grid |
| Colin Prestwich | Smartest |
| Paul O'Donovan | Ofgem |
| Jonathan Purdy | Seeboard |
| Margaret Brunton | NPower |
| Paul Chesterman | LE |
| Richard Harrison | NPower |

4 DESCRIPTION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

4.1 Background

Modification Proposal P116 'Changes to Allow Line Loss Factor Data from BSC Website to be Used in Settlement' (P116) was submitted on 6 January 2003 by East Midlands Electricity Distribution plc.

The Initial Assessment for P116 was presented at the Panel meeting on 16 January 2003. The Panel determined that P116 should be submitted to a 3-month Assessment Procedure by the VASMG.

4.2 The Proposed Modification

P116 seeks to amend provisions in Section S of the Code concerning how HHDAs obtain LLF data to be used in Settlement. Currently, the Code requires HHDAs to use LLF data provided directly by the PDSOs. LLF data is currently sent by the PDSOs via the Line Loss Factor Data File as well as being reported on the BSC Website. P116 seeks:

- (i) to allow LLF data from the BSC Website to be used in Settlement; and
- (ii) to remove the obligation on PDSOs to send LLF data individually to all relevant BSC Parties and Party Agents.

The Proposer stated that P116 was raised to give full effect to the intent behind Alternative Modification P30 - "Availability Of Market Information To BSC Parties And Non-BSC Parties", which was implemented on 27 March 2002. As a result of P30, LLF data is currently being reported on the BSC Website.

The Proposer believed that:

- (i) P116 would remove an unnecessary constraint on the business processes operated by the HHDA's, and would thereby promote efficiency and competition in the supply of electricity.
- (ii) P116 would remove the need for relevant Parties, Party Agents and BSC Agents to process an unnecessary data flow and would thus remove a barrier to market entry.
- (iii) P116 would reduce unnecessary costs incurred by PDSOs and would thereby reduce Distribution Use of System (DUoS) charges. The Proposer felt this issue to be material especially in the case of newly licensed distributors.
- (iv) P116 would improve the efficiency of systems used for the purposes of Settlement and also increase the accuracy of LLF data used in Settlement by removing risks associated with individualised data flows.

4.3 Assessment

The VASMG met three times (on 29 January, 20 February and 18 March 2003) to consider P116.

During the first VASMG meeting on 29 January 2003, ELEXON circulated a Briefing Note which had been presented to the Panel on 14 March 2002, seeking to clarify the scope of Applicable BSC Objectives (c) and (d). The Briefing Note suggested that it is appropriate for the Panel to interpret BSC Objective (d) in a narrow sense, i.e., as being concerned with costs and risks incurred by ELEXON and BSC Agents. The Briefing Note also suggested that it is appropriate for the Panel to interpret BSC Objective (c) in a wider sense, so as to consider the effects of costs and benefits to different industry participants. The Briefing Note explicitly stated that the Panel could consider whether or not reduced costs for PDSOs might end up promoting competition in generation, supply, sale or purchase of electricity whilst also recognising that this is not a straight-forward issue.

The Modification Group noted the existence of three different file formats in which LLF data is processed by different BSC Parties and Party Agents, namely:

1. The SVA Pool File Transfer Format, which is used by certain SVAA Applications and is currently published on the BSC Website.
2. The Pool File Transfer Format, which is distinct from the SVA Pool File Transfer Format.
3. The User File Format.

Based on this information, the Modification Group determined three implementation options and issued an Impact Assessment to determine the costs and benefits to the industry of implementing P116. The three implementation options are summarised in the following table:

| Implementa- tion Option | Description |
|------------------------------------|---|
| 1 | Publish LLF data on the BSC Website in the SVA Pool File Transfer Format only. Discontinue sending the D0265 data flow over the DTN. |
| 2 | Publish LLF data on the BSC Website in all relevant file formats. |

| | |
|----------|--|
| | Discontinue sending the D0265 data flow over the DTN. |
| 3 | <p>Publish LLF data on the BSC Website in the SVA Pool File Transfer Format only.</p> <p>Discontinue the D0265 data flow to those Parties, Party Agents and BSC Agents who can utilise the SVA Pool File Transfer Format available on the BSC Website. But continue sending the D0265 data flow (on request) to Parties or Party Agents who cannot process the SVA Pool File Transfer Format</p> |

The Impact Assessment required BSC Parties, Party Agents, BSC Agents and other impacted industry participants to estimate the costs, benefits, risks and implementation time-scales (separately for each implementation option) in terms of their own systems and processes. The results of the impact assessment indicated that many BSC Parties and Party Agents found it difficult to quantify the costs and benefits involved⁴.

The VASMG then conducted a consultation among industry participants on whether or not P116 would better facilitate the Applicable BSC Objectives. Nine respondents (representing 41 BSC Parties) supported the Proposed Modification whilst three respondents (representing 10 BSC Parties and 1 non-BSC Party) did not support P116.

As a result, a number of VASMG members emphasised that it would be difficult to conduct a realistic cost-benefit analysis for the whole industry in order to quantify the impact of P116. It was felt that any benefits resulting from P116 would be mainly related to the (un-quantified) efficiency and convenience of having a centralised process for the publication of LLF data rather than on specific cost savings to PDSOs or the cost of a one-off systems change by some BSC Parties and Party Agents.

In light of the analysis undertaken, the VASMG considered whether or not P116 would better facilitate BSC Objectives (c) and (d) as set out in paragraph 3 of Condition C3 of the Transmission Licence:

- (c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity; and
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

The VASMG noted that whilst P116 could promote competition in the distribution of electricity, Applicable BSC Objective (c) did not explicitly encompass competition in distribution. It was determined that this fact should be noted in the Assessment Report for the consideration of the Panel.

A number of VASMG members, including the Proposer, felt that P116 would better facilitate the achievement of BSC Objective (c) on the basis that any cost savings to PDSOs would be passed on to Suppliers in a competitive environment. It was also argued that all industry participants would benefit from simplifying and centralising the dissemination of LLF data. However, some Modification Group members doubted whether any cost savings accruing to PDSOs as a result of P116 would actually be passed on to Suppliers and ultimately to their customers. These members also doubted whether the long term benefits to HHDA's and Suppliers were sufficient to justify the one-off costs. As a result, the majority of the Modification Group felt that the effect of P116 on facilitating competition in generation, supply, sale and purchase of electricity would be difficult to agree on. The VASMG decided by a

⁴ For example, a respondent suggested that there would be a one-off cost but was unable to quantify it. Another response stated that the cost would not be major but would be in the "thousands". One BSC Party quoted an estimate of £5,000 for the one-off cost. On the other hand, some PDSOs reported a possible cost saving of between £1,500 to £12,000 per year per PDSO. However, these cost savings included DTN costs as well as process costs. Other PDSOs found it difficult to quantify the effect of P116 but supported the Proposed Modification on the grounds that their processes would become more efficient and manageable.

majority that P116 could not be said to have an unequivocal impact on the better achievement of BSC Objective (c), whilst a minority still believed that Objective (c) would be better facilitated by P116.

The Modification Group also decided (majority) that P116 would better facilitate BSC Objective (d) by providing a centralised facility for the dissemination of LLF data. It was also believed that P116 would improve the integrity of Settlement by eliminating a potential source of error.

As a result of these deliberations, the VASMG decided (majority) that P116 should be justified on the basis of BSC Objective (d), as it was not possible to agree that P116 would have a major impact on the better achievement of BSC Objective (c). The VASMG agreed to recommend that P116 should be made and implemented on 27 November 2003 if an Authority Decision is received by 10 July 2003 and 26 February 2004 if an Authority Decision is received after 10 July 2003 but before 11 September 2003. The Implementation Date was chosen so as to ensure that P116 would be in place for the annual publication of LLF data for the 2004-2005 BSC Year.

To address possible concerns on the impact of P116 on the audit trail, the Modification Group also sought the BSC Auditor's view on P116. The BSC Auditor indicated that they had no major concerns, as the Audit was based on the actual data used and not on the flow of D0265 files.

The Modification Group also considered the three implementation options identified above. Despite its inherent simplicity, Option 1 was felt to involve higher costs for a number of Suppliers and Party Agents. A number of VASMG members suggested that while they actually supported Option 3, they would strongly prefer Option 2 over Option 1, if Option 3 was not chosen. As a result, Option 1 was rejected at the final VASMG meeting.

A number of VASMG members supported Option 3 because they felt it would be unwise to impose what is potentially a significant change on HHDA's at a time when there is increasing competition and when HHDA's are already grappling with other issues. These VASMG members also expressed concern that some Suppliers and Supplier Agents did not want to incur costs and risks with little corresponding benefit to their own business. It was argued that Option 3 should be chosen in order to minimise the risks and costs to some HHDA's and Suppliers. However, Option 3 was rejected by the majority of the VASMG on the grounds that it was too complex for PDSOs and did not fully realise the benefits envisioned by P116. It was also felt that Option 3 would not realise the intent of P116 with regard to the removal of the obligation on PDSOs to send LLF data individually to the relevant BSC Parties and Party Agents.

The Modification Group therefore decided that P116 should be implemented via Option 2, which was seen as a compromise between the requirements for flexibility, standardisation, centralisation and low impact on participants. It was also noted that Option 2 delivers all of the functionality of Option 1, and that Parties who favoured Option 1 would not be impacted if Option 2 were implemented.

5 IMPACT ON BSC AND BSCCO DOCUMENTATION

5.1 BSC

P116 impacts Section S, Annex S-2 and Section V of the Code.

Draft legal text is attached as Annex 1 of this report.

5.2 Code Subsidiary Documents

P116 explicitly seeks to amend BSCP 528 – "SVA Line Loss Factors For Half Hourly and Non-Half-Hourly Metering Systems Registered in SMRS". P116 would also impact BSCP 503 – "Half Hourly Data

Aggregation for SVA Metering Systems registered in SMRS” and BSCP 508 – “Supplier Volume Allocation Agent”. All references to the D0265 flow being sent by PDSOs to Suppliers and HHDA’s would need to be amended.

6 IMPACT ON BSC SYSTEMS

No impact identified. The SVA Agent responded to the Impact Assessment to confirm that their systems and processes would not be impacted.

7 IMPACT ON BSCCO

7.1.1 Background

P116 would place an obligation on the BSC Website to become a fully authorised provider of LLF data. Currently, the obligation is on PDSOs to provide the data via the D0265 flow (either via the DTN or by e-mail). The preferred implementation option also entails that ELEXON would have to process and validate LLF data in three different file formats. Currently, ELEXON’s validation involves only the SVA Pool File Transfer Format.

LLF data is already being published on the BSC Website⁵. There are currently two files containing LLF data for each PDSO:

1. A zipped text file containing the data currently distributed in the D0265 data flow. This file is in the SVA Pool File Transfer Format as described above. The size of each file is between 0.2 – 1.0 MB when zipped, and hence the download time is of no significance.
2. A summarised view of LLF data in Rich Text Format (RTF)

These files cover the span of 1 April to 31 March of the relevant year, corresponding to the extent of a BSC Year. If, on occasion, LLF data is updated during the course of the BSC Year, new files are produced and published so as to reflect these changes. Previous versions of the D0265 and summary files are then removed. The title of each file incorporates an *Effective From* and *Effective To* date and a version number (e.g. “01/04 - 31/03_v1.0”) in order that any updates can be identified easily. If an earlier version of the data currently displayed on the BSC Website is required, the information is made available via the ELEXON Help Desk within ten working days. However, the previous year’s worth of data is not made available in this way.

7.1.2 Enhancements Required

The implementation of P116 would require changes to the BSC Website. Should P116 be implemented, this work would be resourced by the ELEXON Communications and Service Delivery Teams. The Impact Assessment indicates that the required work would cost approximately 15 man days plus ongoing administration. The impact can be summarised as follows:

1. The BSC Website would need to display data files containing three years’ worth of data in three different file formats (in 9 separate files, as they became available). For the avoidance of doubt, these files would contain data for the previous BSC Year, the current BSC Year and the next BSC Year (as the files become available). Data for the following BSC Year usually becomes available in the last quarter of the current year.

⁵ Currently, the following Uniform Resource Locator (URL) is used: <http://www.elexon.co.uk/ta/market_data/ll_factor.html>. It must be noted that the URL might be subject to review, should P116 be implemented.

2. If any changes were made to LLF data during the course of the year, ELEXON would issue an ELEXON Circular and retain the old version of the data on the BSC Website in archived form. (The template for the ELEXON Circular has not yet been drafted.)
3. Whilst it was noted that LLF data files are published annually and are not time-critical, the VASMG requested an assessment of the robustness of the BSC Website, including costs and time-scales for any improvements specifically required for P116. The group also noted that P116 would increase the amount of data downloaded from the BSC Website. ELEXON's response indicated that the robustness of the service has already been improved and that further steps are being taken as part of a Systems Migration Project. As the files on the BSC Website are small, the increase in data download rates was not considered a significant issue.
4. The Modification Group also asked ELEXON to consider ways of making LLF data easier to find and download within the BSC Website. This issue will be considered as part of the implementation of P116, should the Proposed Modification be approved.

Furthermore, the VASMG noted that P116 would place an obligation on ELEXON to be the authorised source of LLF data for the industry. As a result, ELEXON Service Delivery would need to validate and disseminate LLF data in all three file formats. Currently, the obligation is on PDSOs to provide LLF data to all relevant Parties and Party Agents in the appropriate file format. ELEXON's current obligation is to *display* LLF data on the BSC Website in the SVA Pool File Transfer Format only. However, it should also be noted that ELEXON is currently involved in the process by which the Supplier Volume Allocation Group (SVG) approve LLF data on behalf of the BSC Panel (including validation of the files submitted), before such data can be used in Settlement. P116 does not seek to alter this procedure.

The Impact Assessment and consultation phase of the Assessment Procedure also highlighted several issues regarding the size of LLF data files (once unzipped) and the formatting of summarised LLF files. The Modification Group agreed that these issues fall outside the scope of the Assessment Procedure for P116 and should be addressed outside the Modifications Process.

8 IMPACT ON PARTIES AND PARTY AGENTS

An Impact Assessment was carried out as part of the Assessment Procedure for P116. The results of the Impact Assessment are included as Annex 3 of this report.

In summary, the implementation option favoured by the VASMG would affect systems and processes currently utilising the D0265 flow to obtain LLF data. All such systems and processes would need to use the appropriate D0265 file from the BSC Website because Parties and Party Agents would no longer receive individualised D0265 flows over the DTN or by e-mail. However, Parties and Party Agents would not need to alter their systems to accept the SVA Pool File Transfer Format as all three file formats would be made available on the BSC Website. Parties and Party Agents would experience a change in the "To Role Code" and "To Participant ID" fields within the file that they use. The file published on the BSC Website contains the values "G" and "CAPG" for these field respectively, whereas the files currently received by Parties and Party Agents contain values specific to that Party or Party Agent. If any systems or processes are designed to validate the values in these fields, the validation algorithm would need to be reconfigured to accept the values in the file available from the BSC Website. (The Impact Assessment highlighted that a number of BSC Parties and Party Agents would be impacted by this issue.)

PDSOs would also be impacted in that they would not need to send out individualised D0265 files over the DTN or via e-mail.

The Impact Assessment also allowed respondents to raise a number of existing issues, which were deemed to be outside the scope of the Assessment Procedure for P116. These existing issues include the possibility of splitting the LLF files into HH and NHH components to reduce the size of unzipped LLF files, publishing summarised data in comma separated format and including Scottish LLF data on the BSC Website in preparation for BETTA. It was agreed that these issues could be discussed at the Supplier Volume Allocation Group (SVG) outside the scope of the Modifications Procedure.

9 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

The Transmission Company Analysis is included as Annex 4 of this document. In summary, the Transmission Company indicated that P116 would not have any impact on their systems or processes. It is believed that the implementation of P116 does not directly effect the ability of the Transmission Company to discharge its obligations efficiently.

10 SUMMARY OF REPRESENTATIONS

As noted above, the VASMG conducted an Assessment Procedure consultation with responses due on 17 March 2003. In summary, nine respondents (representing 41 BSC Parties) supported the Proposed Modification whilst three respondents (representing 10 BSC Parties and 1 non-BSC Party) did not support P116.

BSC Parties, Party Agents and interested third parties were invited to provide answers to the following questions:

1. Do you believe that Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)?
2. Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group?
3. Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure?
4. Are there any further comments on P116 that you wish to make?

Responses were received from the following Parties and non-BSC Parties:

| No. | Company | File Number | No. BSC Parties Represented | No. Non-Parties Represented |
|-----|--|--------------|-----------------------------|-----------------------------|
| 1 | Western Power Distribution | P116_ASS_001 | 2 | 0 |
| 2 | East Midlands Electricity Distribution | P116_ASS_002 | 1 | 0 |
| 3 | LE Group | P116_ASS_003 | 9 | 0 |
| 4 | IMServ | P116_ASS_004 | 0 | 1 |
| 5 | Aquila Networks Plc | P116_ASS_005 | 1 | 0 |
| 6 | NEDL/YEDL | P116_ASS_006 | 2 | 0 |
| 7 | British Gas Trading | P116_ASS_007 | 1 | 0 |
| 8 | Scottish Power | P116_ASS_008 | 6 | 0 |
| 9 | NGC | P116_ASS_009 | 1 | 0 |
| 10 | Innogy | P116_ASS_010 | 9 | 0 |

| | | | | |
|-----------|-----------------------|--------------|----|---|
| 11 | Scottish and Southern | P116_ASS_011 | 4 | 0 |
| 12 | Powergen | P116_ASS_012 | 15 | 0 |

The results of the consultation are described in the following table. In relation to Question 2, it should be noted that the implementation option favoured by the Modification Group was Option 1 at the time when the Impact Assessment was issued, but it has now changed to become Option 2 as a result of the responses received. As noted above, this option delivers all of the functionality of Option 1 while requiring two additional file formats to be displayed on the BSC Website.

| No. | Q1 | Q2 | Q3 | Q4 |
|------------|-----------|----------------|------------------------------|------------------|
| 1. | Yes | Option 1 | No | No |
| 2. | Yes | Option 1 | No | No |
| 3. | Yes | Option 1 | No | No |
| 4. | No | Option 3 | No | Lead Time |
| 5. | Yes | Option 1 | No | No |
| 6. | Yes | Option 1 | HH / NHH Split | No |
| 7. | Yes/No | only Option 3 | Process / Audit | DUoS?, accuracy? |
| 8. | Yes | Option 2 | File size, CSV format, BETTA | BETTA |
| 9. | Yes | Option 1 | No | No |
| 10. | No | Option 3 | No | Objective (c)? |
| 11. | Yes | Option 1 | CSV, BETTA | No |
| 12. | Yes | Options 2 or 3 | Process | incentives? |

It must be noted that several respondents highlighted a number of issues that were deemed to be outside the scope of the Assessment Procedure for P116, but which could be progressed separately by ELEXON. These include:

1. The possibility of splitting LLF data files into separate half-hourly (HH) and non-half-hourly (NHH) files
2. The possibility of displaying summarised LLF files in a different format (e.g., comma separated)
3. The possibility of including Scottish LLF data on the BSC Website in anticipation of BETTA.

ANNEX 1 – PROPOSED TEXT TO MODIFY THE BSC

Please see separate attachments.

ANNEX 2 – CONSULTATION RESPONSES

Responses from P116 Assessment Consultation (issued on 11 March 2003)
Representations were received from the following parties:

P116_ASS_001 – Western Power Distribution

| | |
|---|---|
| Respondent: | Graham Smith |
| No. of BSC Parties Represented | 2 |
| BSC Parties Represented | Western Power Distribution (South West) Western Power Distribution (South Wales) |
| No. of Non BSC Parties Represented | |
| Non BSC Parties represented | |
| Role of Respondent | Licensed Distributor |

| Q | Question | Response | Rationale |
|---|---|----------|---|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | If accepted, the modification will reduce the cost that a Distributor incurs in communicating LLFCs to Suppliers and HHDAs. Ultimately these costs are passed through to Suppliers and, in turn, Customers. Any reduction in costs will therefore contribute to meeting applicable BSC objective C. In addition applicable objective D is met as it will be more efficient to distribute/make available LLFC data from one central location, i.e. the Elexon website. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | Yes | We fully support implementation of "option 1". It causes the least impact and does not require us to make any changes or enhancements to current processes. In our view it produces the maximum benefits possible. It is accepted that Suppliers/DA's will require time to amend systems and this needs to be taken in to account. The main costs are incurred at annual resubmission of LLFCs the so we would be happy for the modification to be implemented at any time prior to the approval and distribution of 2004/2005 factors. |

| Q | Question | Response | Rationale |
|---|--|----------|-----------|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | No | |

P116_ASS_002 – East Midlands Electricity Distribution

| | |
|---|--|
| Respondent: | <i>Name</i> Andrew Neves |
| No. of BSC Parties Represented | One |
| BSC Parties Represented | <i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> East Midlands Electricity Distribution plc |
| No. of Non BSC Parties Represented | None |
| Non BSC Parties represented | <i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| Role of Respondent | <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> Distributor |

| Q | Question | Response | Rationale |
|---|--|------------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | My belief is based on the reasons given in my original modification proposal, and discussed and augmented during the VAMG meetings |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | Yes | Option 1 is the simplest, and this will minimise any risks of errors |

| Q | Question | Response | Rationale |
|---|--|----------|-----------|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | No | |

P116_ASS_003 – LE Group

| | |
|---|---|
| Respondent: | Jonathan Purdy |
| No. of BSC Parties Represented | 9 |
| BSC Parties Represented | LE Group plc, London Electricity plc, Jade Power Generation Ltd, Sutton Bridge Power Ltd, West Burton Power, London Power Networks plc, EPN Distribution Ltd, Seeboard Power Networks plc, Seeboard Energy Ltd, |
| No. of Non BSC Parties Represented | None that we consider applicable |
| Non BSC Parties represented | |
| Role of Respondent | Supplier / Generator / Party Agent / PDSO |

| Q | Question | Response | Rationale |
|---|--|---------------------|---|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes / No | I concur both with the propose that the Modification would better facilitate BSC Objective (c) for the reasons stated and also that the Modification would better facilitate BSC Objective (d) because it simplifies and, therefore, reduces risk in the process. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group. Please give rationale. | Yes / No | I concur with the views of VASMG that Option 1 is the simplest solution with the greatest benefits for BSC parties. |

| Q | Question | Response | Rationale |
|---|--|---------------------|-----------|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | Yes / No | |
| 4 | Are there any further comments on P116 that you wish to make? | Yes / No | |

P116_ASS_004 – IMServ

| | |
|---|--|
| Respondent: | <i>Name Tom Cook</i> |
| No. of BSC Parties Represented | <i>Nil</i> |
| BSC Parties Represented | <i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| No. of Non BSC Parties Represented | <i>One</i> |
| Non BSC Parties represented | <i>IMServ</i> |
| Role of Respondent | <i>Party Agent</i> |

| Q | Question | Response | Rationale |
|---|--|----------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | No | Objectives are best served by leaving recipients the choice of web download or DTN Flow. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | No | Option 3 favoured. |

| Q | Question | Response | Rationale |
|---|--|----------|--|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | Yes | If Option 3 is not chosen then there will be a lead time for implementation of either Option 2 or 3. |

P116_ASS_005 – Aquila Networks Plc

| | |
|---|---|
| Respondent: | Rachael Gardener |
| No. of BSC Parties Represented | |
| BSC Parties Represented | Aquila Networks Plc. |
| No. of Non BSC Parties Represented | |
| Non BSC Parties represented | |
| Role of Respondent | (Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state) |

| | Question | Response | Rationale |
|---|--|----------|---|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | If all parties operate from one set of data published on the website, rather than generation of an individual file for each party requiring a D0265 there is less risk of that individual party operating from a file which has been generated by incorrect data input. The file on the website will have been verified by Elexon under the process for the annual update of LLF values. Distribution businesses incur significant costs under the present arrangements and this proposal will reduce those costs significantly. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | Yes | |

| | Question | Response | Rationale |
|---|--|-----------------|------------------|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | No | |

P116_ASS_006 – YEDL/NEDL

| | |
|---|--|
| Respondent: | <i>Ann Penford</i> |
| No. of BSC Parties Represented | <i>NEDL and YEDL</i> |
| BSC Parties Represented | <i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| No. of Non BSC Parties Represented | <i>2</i> |
| Non BSC Parties represented | <i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| Role of Respondent | <i>PDSO</i> |

| Q | Question | Response | Rationale |
|----------|--|-----------------|--|
| 1. | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | YEDL and NEDL support and promote efficiencies on the production of D265's |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | Yes | No problems with this – providing the website is robust |

| Q | Question | Response | Rationale |
|---|--|----------|---|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | Yes | There is a request from a party that the D265 is split between NHH and HH – this would not benefit time saving in PDSOs |
| 4 | Are there any further comments on P116 that you wish to make? | No | |

P116_ASS_007 – British Gas Trading

| | |
|---|---------------|
| Respondent: | Andrew Latham |
| No. of BSC Parties Represented | British Gas |
| BSC Parties Represented | 1 |
| No. of Non BSC Parties Represented | N/A |
| Role of Respondent | Supplier |

| Q | Question | Response | Rationale |
|---|--|-----------------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Option 1 (No) | No to C and D there is not evidence of improved benefit and would actually for British Gas cause an automated process now being moved to a manual process. Lead-time 6 months to change systems plus significant costs. |
| | | Option 2 (No) | No C & D there is not evidence of improved benefit and would actually for British Gas cause an automated process now being moved to a manual process. Lead-time 6 months to change systems plus significant costs. |
| | | Option 3 (yes) | Yes to both C & D This option would allow existing Parties to either receive the D0265 or to choose to select from the Web Site. It would also have no impact on our Business. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | Yes to Option 3 | We would support option 3 to ensure we still receive the D265 via our gateway, which automatically validates the flows prior to loading into appropriate systems in the correct format. But if we wish in the future we could use the Web Site |

| Q | Question | Response | Rationale |
|---|---|----------|---|
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | Yes | <p>The principle of allowing Parties to select the option of loading the D0265 via either the web site or automated does leave questions.</p> <p>How will you ensure all parties are loading the data and validating as current procedures?</p> <p>What happens if they do not load the data at all will it have an impact on Settlements across the whole industry?</p> <p>Who will ensure they have been loaded? I.e TAA, Auditors?</p> <p>Will a new BSCP procedure need to be written for the process?</p> <p>Cost for the Web Site has not been produced by Elexon and for ongoing costs to publish so will there be an actual cost benefit to the industry?</p> |
| 4 | Are there any further comments on P116 that you wish to make? | Yes | <p>On Page 5 there is a list of benefits that have not been justified by Elexon in this document in the form of materiality and improved data.</p> <p>3.That being to what level would Duos costs be reduced?</p> <p>4.How would this proposal increase the accuracy of data within settlement?</p> |

P116_ASS_008 – Scottish Power

| | |
|---|---|
| Respondent: | <i>Name John W Russell (SAIC Ltd)</i> |
| No. of BSC Parties Represented | 6 |
| BSC Parties Represented | <p><i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i></p> <p>Scottish Power UK plc; ScottishPower Energy Trading Ltd.; Scottish Power Generation plc; ScottishPower Energy Retail Ltd.; SP Transmission plc; SP Manweb plc.</p> |
| No. of Non BSC Parties Represented | |
| Non BSC Parties represented | <p><i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i></p> |
| Role of Respondent | <p><i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i></p> <p>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</p> |

| Q | Question | Response | Rationale |
|---|----------|----------|-----------|
|---|----------|----------|-----------|

| Q | Question | Response | Rationale |
|----------|---|-----------------|---|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | <i>The proposed changes would better facilitate Objective (d), as the process would be more manageable as it is more efficient to download all LLFs data from a single source i.e. the ELEXON Website. However, we would propose that changes to the current process are required to enable data to be more “globally” available on the website, which can then be loaded into Party systems without much disruption and hence better facilitate Objective (c).</i> |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | No | <i>We would prefer that a more global approach is taken by publishing the LLF data on the BSC Website in all relevant file formats, this will reduce the impact on Parties and promote efficiency.</i> |
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | Yes | <i>As well as having files on the website we would also wish the following: - At the moment the D0265 files that we receive are between 50 to 80 MBs in size. We therefore request that the files be available in *.zip format for easier downloading from the website. For this same reason we would prefer the files to remain separate. Considering the large size of these files and the fact that they contain both HH and NHH LLF data we would like the Modification Group to consider offering a cut down HH only version of the D0265 file for HHDA's. This would have a very large benefit in terms of processing time required to load these files. We would also request from the BSC website, SVA data in Summarised format in a .csv file for each distributor that can be loaded into our Settlements validation systems. This will also reduce the storage requirements significantly for D0265 information. We would require such files to be available for testing in our systems in July/August 2003</i> |
| 4 | Are there any further comments on P116 that you wish to make? | Yes | <i>From the document it is not clear whether Elexon will collate all D265's into 1 file, or keep them separate. We assume that all files will be kept separate. LLFs need to be published on the website in a timely manner, to ensure they are not too late for use in Settlements calculations. It would be desirable to have Scottish LLFs available on the ELEXON website in the same arrangement as a precursor to a GB wide LLFs data source under BETTA</i> |

P116_ASS_009 - NGC

| | |
|---|---|
| Respondent: | Clare Talbot |
| No. of BSC Parties Represented | One |
| BSC Parties Represented | <i>Please list all BSC Parties responding on behalf of (including the respondent company if relevant).</i> National Grid |
| No. of Non BSC Parties Represented | None |
| Non BSC Parties represented | <i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> None |
| Role of Respondent | <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state)</i> BSC Party |

| Q | Question | Response | Rationale |
|----------|---|-----------------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | We believe that the proposal meets objective c) as it removes a number of constraints on parties and their agents in processing an additional data flow. We also believe that the proposal meets objective d) by making data available in a consistent format to be obtained from a single verified source ie. the Elexon website. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | | As we are not users of the D0265 we will express a neutral view, however we note that the majority of respondents support implementation option 1. |
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | No | |

P116_ASS_010 - Innogy

| | |
|---------------------------------------|--|
| Respondent: | <i>Richard Harrison, Npower Limited</i> |
| No. of BSC Parties Represented | 9 |
| BSC Parties Represented | Innogy plc, Innogy Cogen Limited, Innogy Cogen Trading Limited, Npower |

| | |
|---|---|
| | Limited, Npower Direct Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited and Npower Yorkshire Supply Limited |
| No. of Non BSC Parties Represented | |
| Non BSC Parties represented | <i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| Role of Respondent | <i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i> |

| Q | Question | Response | Rationale |
|----------|---|-----------------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes / No | We recognise that this Modification potentially creates a simplified method for downloading LLF data for some parties. However, we would point out that if the D0265 is not provided, this means that certain integrity checks (which form part of the obligations in BSCP503) will no longer work and the audit trail will be compromised. Therefore it could be argued that this creates additional risk to the settlement process and does not therefore promote efficiency in the implementation and administration of the balancing and settlement arrangements (objective (d)). Furthermore, the changes required to HHDA systems potentially divert effort from the resolution of other problems affecting data quality, which it can be argued are a barrier to competition in generation and supply (objective (c)) |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | No | We are not convinced that the obligations for validation of the LLF file can be effectively shifted from the receiving HHDA in the way described under Options 1 and 2 without creating a risk to the settlement process. We believe that Suppliers and their Agents should continue to have the option of receiving the file directly from the DNO, if this is required in order to fulfil their BSC obligations effectively. |
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | No | |
| 4 | Are there any further comments on P116 that you wish to make? | Yes | The main driver for this Modification seems to be Distribution Business requirements. However, we note that this does not constitute a valid Applicable BSC Objective. |

P116_ASS_011 – Scottish and Southern

| | |
|---------------------------------------|--|
| Respondent: | <i>Garth Graham</i> |
| No. of BSC Parties Represented | 4 |
| BSC Parties Represented | Scottish and Southern Energy, Southern |

| | |
|---|--|
| | Electric, Keadby Generation Ltd. and SSE Energy Supply Ltd. |
| No. of Non BSC Parties Represented | |
| Non BSC Parties represented | <i>Please list all non BSC Parties responding on behalf of (including the respondent company if relevant).</i> |
| Role of Respondent | |

| Q | Question | Response | Rationale |
|---|---|----------|--|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes / No | Subject to the needs for BETTA being taken into account, we believe that P116 would better facilitate the applicable BSC Objectives. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | | Subject to the needs for BETTA being taken into account, we support the implementation approach described in the consultation document. |
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | | We re-iterate our previous comments concerning a number of technical issues associated with proceeding with this Modification Proposal . Furthermore, given the approval by the Authority of P108, it would be desirable to have Scottish LLFs available on the ELEXON website in the same 'Summarised' .csv file format as a precursor to a GB wide LLFs data source under BETTA. |
| 4 | Are there any further comments on P116 that you wish to make? | | |

P116_ASS_012 - Powergen

| | |
|---------------------------------------|--|
| Respondent: | Afroze Miah |
| No. of BSC Parties Represented | Powergen UK plc, Powergen Retail Limited, Diamond Power Generation Limited, Cottam Development Centre Limited, TXU Europe Drakelow Limited, TXU Europe Ironbridge Limited, TXU Europe High Marnham Limited, Midlands Gas Limited, Western Gas Limited, TXU Europe (AHG) Limited, TXU Europe (AH Online) Limited, Citigen (London) Limited, Severn Trent Energy Limited (known as TXU Europe (AHST) Limited), TXU Europe (AHGD) Limited and Ownlabel Energy Limited |
| BSC Parties Represented | 15 |
| Role of Respondent | Supplier |

| Q | Question | Response | Rationale |
|----------|---|-----------------|---|
| 1 | Do you believe Proposed Modification P116 better facilitates the achievement of Applicable BSC Objectives, especially Objectives (c) and (d)? Please give rationale and state objective(s). | Yes | This modification supports both Applicable BSC Objectives (c) and (d) as it will enable suppliers to become more efficient and effective in their competitive position. |
| 2 | Do you support the implementation approach described in the consultation document / the implementation option preferred by the Modification Group? Please give rationale. | No | We would support either Option 2 or Option 3. We want to see both UFF & PFF supported. This would prevent the onus being placed on parties to change their loading routines at additional costs. Whilst this flow D0265 is unique and warrants special consideration due to the costs, we need to be sure we are not moving away from the robust concept of the DTN, controlled by a DTC. |
| 3 | Does P116 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale. | Yes | How do you intend to control release of the flows to the website? When will they be made available? How do structural faults in the flow get reported? Will it be via the Elexon Helpdesk? |
| 4 | Are there any further comments on P116 that you wish to make? | Yes | While we agree that the DBs are lacklustre in the way in which they make the data available and the way they send them, what incentives are Elexon going to place upon the DBs to make the information available to the website? |

ANNEX 3 – BSC PARTY AND PARTY AGENT IMPACT ASSESSMENTS

DLIA of P116

Responses due 5 March 2003

| Organisation | Comments |
|---|---|
| <p>Graham Smith Western Power Distribution</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>Our current process involves the production of LLFC summary spreadsheets file (AKA the BSCP528 workaround) plus the production of a single file of the full D0265 data. This is sent to Elexon annually for Panel approval. This process will be unaffected irrespective of which of the three options is implemented, or indeed if none of them is implemented.</p> <p>Following approval we send a D0265, specific to the recipient, to Suppliers and HHDA's. The process for producing and transmitting the files is largely automated, although some manual intervention is needed in file production and in manual follow up where the recipients gateway has not accepted the file. Options 1 and 2 will remove this requirement completely and implementation of either will save around £12,000 per year.</p> <p>The savings for Option 3 will be less than this but cannot be determined, as we do not know how many files will still need to be transmitted. Assuming 50% of files no longer need to be sent via the DTN we would save around £5000 per year</p> <p>None of the options introduce and implementation costs or risks. We could implement immediately on receipt of notice.</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>N/A</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>As per response to question 1 removing the requirement to send files over the DTN will save around £12,000 per year, (this is the combined total for 2 distribution businesses). There are no implementation costs or risks; we could implement immediately.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>NO</p> <p>What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Either option 1 or option 2.</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>NO</p> <p>Any other comments on technical issues concerning P116?</p> |
| <p>Rachel Lockley British Energy</p> | <p>British Energy do not currently receive the D0265 flow via the DTN. Therefore if the D0265 was to be discontinued the impact to BE would be minimal</p> |

| | |
|---|---|
| | <p>It is felt that being able to obtain the information via the web-site would be more cost effective and less time consuming (in our experience the D0265 can cause delays when coming across the Gateway).</p> <p>We currently receive the LLF as part of the initial registration process and any amendments made will be updated using a D0171. However, being able to access the D0265 on the internet would be a useful tool and should be available in all relevant file formats.</p> <p>I can provide further details on this CP if required but as the impact is not significant I feel the questions below are not necessarily relevant to BE.</p> <p>Please do not hesitate to contact me if you have any queries.</p> |
| <p>Rachael Gardener Aquila Networks (PDSO)</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>Implementation of Option 1. At present we have to prepare (potentially) in excess of 40 separate files, which are then emailed or posted to the various recipients. Each file has to be generated individually to ensure that the checksum calculation is correct, it is not just a matter of text editing to change the recipient ID. This is very labour intensive and an estimate of the cost involved in preparing the files is in excess of £800. Discontinuing sending the D0265 flow over the DTN will also produce positive benefits in terms of savings from DTN costs, although this will depend on the number of recipients who still request the file over the DTN. (However please note that BSCP528 does not oblige the PDSO to send the file over the DTN, see para 3.1.10 of BSCP528). Option 1 therefore provides an estimated benefit of £1,500 based on current practices, with no additional costs or risks and can be implemented immediately.</p> <p>Implementation of Option 2. We already produce the file in Pool Transfer Format. Elexon converts this to SVA Pool Transfer Format for publication on the website. Provided that Elexon can also convert this to User File Format (Variable or Fixed) this option does not affect us. If we were required to produce the file in all formats it may cause additional costs, which for these purposes we give a conservative estimate of £200.</p> <p>Implementation of Option 3. This would be very much status quo for us, although we are not currently obliged to send the file as a flow over the DTN. If we were obliged to send the flow over the DTN to all recipients requesting there is the potential for an increase in costs.</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>We generate the file in Pool Transfer File Format. If required to generate it in SVAA Pool Transfer Format changes would be required to our system, which for these purposes we have given a conservative estimate of £500.</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>Details given in our response to implementation of option 1.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>No.</p> <p>What would be your preferred Implementation Option, if P116 were implemented?</p> |

| | |
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| | <p>Implementation of Option 1.</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>None.</p> <p>Any other comments on technical issues concerning P116?</p> <p>Please note that BSCP528 does not oblige the PDSO to send the file over the DTN, see para 3.1.10 of BSCP528. The method specified is email or post. This was changed on 13 May 2002 with the issue of Version 3.0 of BSCP528.</p> |
| <p>Rachael Gardener Aquila Networks (NHHDA)</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>As we are currently able to use the SVA Pool File Transfer Format available on the BSC website or the D0265 data flow, there are no distinct benefits or costs associated to the 3 options suggested.</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>We prefer to use the SVA Pool File Transfer Format available on the BSC website but as mentioned above, we can use the D0265 data flow.</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>There would be no changes required to our current process if we had to download the LLF data from the BSC website for the reasons given above.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>We cannot think of any other options.</p> |

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| | <p>What would be your preferred Implementation Option, if P116 were implemented?</p> <p>It makes no difference for us which option is used if P116 was implemented as we would use the BSC website.</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>We would suggest a deadline is set for the data to be made available by on the BSC website so we know when we can download the data rather than just looking to see if it's there as we do know.</p> <p>Any other comments on technical issues concerning P116?</p> <p>We cannot think of any technical issues currently.</p> |
| <p>Sue Calvert YEDL & NEDL</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>NEDL and YEDL will have cost saving benefits for the implementation of any of the options. Timescales for implementation asap – but realistically from 1/4/03</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>I believe that NEDL and YEDL's format is as per the SVA Pool Transfer Format, if we were to reconfigure our systems there would be major changes to IT systems with associated costs involved.</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>I do not believe that this would affect PDSOs other than saving time processing more that one flow. Risks involved if the file is corrupted.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>NEDL and YEDL would be happy to have the D265's put on the website for a trial period.</p> <p>What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Option 2</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>D265 data would need to be stored for the period as for the Data Retention period and in all formats until such time that all parties could download.</p> |

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| | <p>Any other comments on technical issues concerning P116?</p> |
| <p>Anne Stone London Energy Company & SWEB</p> | <p>Although this CPC has a minimal impact on Energy Branch systems we would like to support the change.</p> |
| <p>Man Kwong Liu Scottish Power</p> | <p>1. Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p><i>Option 1 Publish LLF data on the BSC Website in the SVA Pool File Transfer Format only. Discontinue sending the D0265 data flow over the DTN. The ScottishPower HHDA application currently accepts files in either Pool Transfer File Format or Variable User File Format. It does not accept SVA Pool Transfer File Format. An additional pre-processor would be required to change the format, or the application would need to be changed. As the flow would not be sent over the DTN (in the correct format for us) we would need to carry out this work. Also, the file header would need to be amended to reflect the true recipient. There will be an added cost and risk involved in this as all files will need to be edited. We estimate that we need a 6 months notice and the cost will not be major but would be in the thousands.</i></p> <p><i>Option 2 Publish LLF data on the BSC Website in all relevant file formats. Discontinue sending the D0265 data flow over the DTN. This is the preferred option for us. It allows us to control and monitor the processing of the files with no system changes and minimal manual impact.</i></p> <p><i>Option 3 Publish LLF data on the BSC Website in the SVA Pool File Transfer Format only. Discontinue the D0265 data flow to those Parties, Party Agents and BSC Agents who can utilise the SVA Pool File Transfer Format available on the BSC Website. But continue sending the D0265 data flow (on request) to Parties or Party Agents who cannot process the file from the BSC Website. This is the most neutral option, as it requires no changes to the current systems and processes. But it means that Distributors still require to send DTN flows.</i></p> <p>2. Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>We would prefer all formats be available as in Option 2. See answer to Q1 Option 1 regarding system changes for SVA Pool File Transfer Format.</p> <p>3. If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>The process would be more manageable. It is more efficient to download all LLFs data from a single source such as the ELEXON Website. Changes to the current process are required to enable data is also available in 'Summarised' file format as a .csv file in the website, which can be loaded into our systems. For system changes see the answers to Q 2 and 3.</p> <p>4. Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>Yes, as well as having files in on the website as suggested in Option 2, we would also wish the following: -</p> <p>At the moment the D0265 files that we receive are between 50 to 80 MBs in size. We therefore request that the files be available in *.zip format for easier downloading from the website. For this same reason we would prefer the files to remain separate. Considering the large size of these files and the fact that they contain both HH and NHH LLF data we would like the Modification Group to consider offering a cut down HH only version of the D0265 file for HHDA's. This would have a very large benefit in terms of processing time required to load these files.</p> <p>And also to get from the BSC website a SVA data in Summarised format in a .csv file for each distributor that can be loaded into our Settlements validation systems. This will also reduce the storage requirements significantly for D0265 information. We would require such files to be available for testing in our systems in July/August 2003.</p> <p>5. What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Alternative Option as described in Q.4 above is our ideal implementation option, otherwise, we would prefer Option 2 as discussed on Q1 above.</p> <p>6. Would you like to make any comments regarding the enhancements to the BSC</p> |

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| | <p>Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>Yes, as described in Q4 above.</p> <p>7. Any other comments on technical issues concerning P116?</p> <p>From the document it is not clear whether Elexon will collate all D265's into 1 file, or keep them separate. I assume that all files will be kept separate. LLFs need to be published on the website in a timely manner, to ensure they are not too late for use in Settlements calculations. It would be desirable to have Scottish LLFs available on the ELEXON website in the same arrangement as a precursor to a GB wide LLFs data source under BETTA.</p> |
| <p>Clare Talbot NGC</p> | <p>No impacts have been identified on National Grid from the proposed modification and therefore we have no specific comments to make in response to the Detailed Level Impact Assessment.</p> |
| <p>Nick White IMServ</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>Option 3 would have no impact on our current processes.</p> <p>Options 2 would require additional manual effort to log on to the website and download separate files for each of the distribution Ids registered. Currently this is fourteen files, however the changes in Modification Proposal P62 due to go live in August would facilitate the registration of a number of other distributors. There is no clear indication as of yet on how the number of Distributor Ids will increase, but it could be seen as a risk by having individual recipients of the D0265 responsible for retrieving a separate file for every distributor required, especially if this number is expected to increase significantly, as suggested by P62.</p> <p>Option 1 would have the same impact as Option 2 but would also require an update to the loader to recognise the new format.</p> <p>We agree that having a centralised view of the information used by all parties is of a benefit, and should reduce any data discrepancies. This would not be the case for option 3, however option 3 would provide the least impact, and therefore involve the least risk.</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>Changes would be required to allow the processing of the SVA Pool Transfer File Format. This would be loader changes to recognise the different format of the file and to test any changes to ensure the data is loading correctly.</p> <p>(The file is currently processed in the Pool Transfer File Format)</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>As stated in 1. the retrieval of Line Loss Factor files would be a manual process, and there is no way of knowing how many new distributors will be registered, and how soon this will occur. Effectively these numbers will only increase. Downloading these large files over the Internet may also be significantly more time consuming than loading automatically from the DTN. This could prove counter productive, making HHDA's less efficient in the processing of LLF data rather than more so (as is the intention of the change).</p> <p>With regards the lead-time, if the information were to be provided in the correct format then there would be no additional development time, only configuration and process changes (to download the files and configure them to be loaded into the HHDA system), which would</p> |

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| | <p>reduce the required lead-time (3 months would be acceptable).</p> <p>If the format is different to the one currently received then the lead time would be 6 months, as changes would be required to the current loader processing.</p> <p>Option 3 would require no changes on our part.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>No.</p> <p>A.1.1 What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Our preferred option would be option 3. This would have no impact on the current processing for parties using the Pool File Transfer Format or User File Format and incur no costs to them, but would allow those Parties currently processing the SVA Pool Transfer Format to download data from the website, thus still reducing the volume of DTN data flows.</p> <p>We currently receive and load the D0265 via the DTN and would prefer to continue this process.</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>There isn't sufficient information regarding what information will be included in the ELEXON circular. One of the reasons specified for implementing these changes was to allow Parties to be selective in which LLF data they downloaded. For this to be effective the ELEXON circular would need to detail the Distributor whose data had changed and perhaps the settlement days affected. There is also no information on how often these circulars will be published (on an ad-hoc or regular basis). If regular then how often, and if ad-hoc, how soon after the applicable change is made?</p> <p>The BSC website will need to allow the downloading of a specific Distributor's set of LLFs, for a set date or range of dates, and it would also be sensible to allow a "download all" option for the current set of LLFs (in light of P62). This would still need to produce a separate file for every distributor, but would prevent the users manually downloading individual files for each and every distributor Id.</p> <p>A.1.2 Any other comments on technical issues concerning P116?</p> <p>Could the performance of the website be guaranteed? What is likely to happen if a large number of Parties attempt to retrieve large volumes of data at the same time?</p> |
| <p>Sue Macklin Scottish and Southern</p> | <p>Q1 None of the 3 options provide significant benefits to BSC Party Suppliers as the current problems in handling the size of D0265 files (up to 50 MB) are not addressed. Some benefits are achieved in administration efficiency, but these could be outweighed by other accessibility issues if the current size of file is retained (see Q7 below). The preferred option is to be able</p> |

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| | <p>to load the 'Summarised LLF data' as a machine readable file in .csv format. This would Considerably reduce current problems in loading and storing the D0265 LLFs data. This would also help to fulfil the fourth enhancement required in section 3.5.2 of the P116 Requirements Specification Options ('ELEXON to assess ways of making the LLF data more easily accessible on the BSC Website').</p> <p>Options 1 and 2 will also incur additional costs as our systems would have to recognise changes to the 'To Role Code' and 'To Participant ID' fields in the file header.</p> <p>Q2 Currently, our Supplier systems are configured to accept the D0265 LLFs data in SVA Pool Transfer File Format. As stated above however, the preference is to move to a position where SVA LLFs data can be loaded in 'Summarised' file format in a .csv file.</p> <p>Q3 We would envisage an increased efficiency in administration of this data via the ability to download all SVA LLFs data from a single source such as the ELEXON Website. Our current process will need to change simply by regularly referencing the Elexon website to obtain this data (and any updates), as opposed to contacting each Distributor. In addition we would prefer that the proposed process makes available website data in 'Summarised' file format as a .csv file which can be loaded more easily into our systems (the current RTF report format for the Summarised LLFs data is not suitable for downloading into our systems).</p> <p>Q4 Yes. As above, we would prefer the option of the provision of a .csv file of SVA data in Summarised format for each distributor which can be loaded into our Supplier systems. This would minimise file transfer traffic when downloading this data, store the data efficiently and reduce the time and effort spent capturing data onto our systems. It would be helpful if such files could be available for testing in our systems in July/August 2003.</p> <p>Q5 Of the options presented Option 1 is preferred. Our optimum solution would be Option 1 with the files in 'Summarised' format in .csv files.</p> <p>Q6 As indicated in responses to other questions, consideration should be given providing the information in 'Summarised' file format in a .csv file as a means of mitigating the risk of this part of the website failing due to the size of and peak demands on data files.</p> <p>Q7 Some issues which could be of concern are :</p> <ul style="list-style-type: none"> - Timing of publication of LLFs. If changes to LLFs are not published on the website in a timely manner, this may be too late for use in Settlements calculations. - If 3 years worth of LLFs data is placed in a website file (Enhancement 1, section 3.5.2), this will create files of unmanageable size (up to 150 MB) - hence our preference for files in 'Summarised' csv format. Additionally, these files are likely to be accessed in peaks, particularly as Parties acquire data for each new BSC Year. Is there a risk that the website might become unstable as a result of many Parties attempting to simultaneously access such large data files ? This should be considered when assessing the robustness of the service, as requested by VASMG. Also, is this issue likely to be exacerbated in the future with the introduction of P62 ? Might a steady increase in the number of Licensed Network Operators requiring publication of their LAFs via the Elexon website cause future difficulties ? - It would be desirable to have Scottish LLFs available on the ELEXON website in the same 'Summarised' .csv file format as a precursor to a GB wide LLFs data source under BETTA. |
| <p>Jonathan Purdy SEEBOARD Power Networks</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>Option 1 - This represents a cost saving in IDTN sending costs estimated to be £30k (3 x PDSO to 50 x Suppliers/HHDA @£200/file) for each occasion files were sent out. It has the benefit of making the process simple. PDSO would send their D0265s to Elexon for approval (as at present and on approval Elexon would post them up on their Website. All parties who require LLF can then obtain them from a single point of contact - the Elexon Website. This option would lower risk.</p> <p>Option 2 - Cost savings would be as above; Elexon would have a little more work to do to post multiple file formats otherwise as above</p> <p>Option 3 - a percentage of the above amount dependent upon how many Party's use the Elexon website instead. The risks would be higher than 1 as there would be different</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>No Impact</p> |

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| | <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>See 1.</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>No - Option 1 is the best solution.</p> <p>What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Option 1.</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>A.1.3 Any other comments on technical issues concerning P116?</p> |
| <p>Dave Morton SEEBOARD Energy (late response)</p> | <p>Q1 None of these 3 options provide significant benefits to us as a Supplier, as current problems in handling the size of D0265 files (up to 50 MB) are not addressed. Our preferred option is to be able to load 'Summarised LLF data' as a machine readable file in .csv format. This would considerably reduce current problems in loading and storing D0265 LLFs data. This would also help to fulfil the fourth enhancement required in section 3.5.2 of P116 Requirements Specification Options.</p> <p>Options 1 and 2 will also incur additional costs as our systems would have to recognise changes to the 'To Role Code' and 'To Participant ID' fields in the file header. We would expect that changes could be made to support such changes with 6 months notice.</p> <p>Q2 Currently, our systems are configured to accept D0265 LLFs data in SVA Pool Transfer File Format but as stated above, our preference is to move to a position where SVA LLFs data can be loaded in 'Summarised' file format in a .csv file.</p> <p>Q3 It is more efficient to download all SVA LLFs data from a single source such as Elexon's Website. Changes to current process that are required are that the website data is available in 'Summarised' file format as a .csv file which can be loaded into our systems. The current RTF report format for the Summarised LLFs data is not suitable for downloading into our systems and changes to utilise this would be difficult to introduce.</p> <p>Q4 As above, we require an option of the provision of a .csv file of SVA data in Summarised format for each distributor. This can be loaded into our Settlements validation systems. We would require such files to be available for testing in our systems in July/August 2003.</p> <p>Q5 Option 1 is preferred with files in 'Summarised' format in .csv files.</p> <p>Q6 No comments</p> <p>Q7 Some issues that could be of concern are:</p> <ul style="list-style-type: none"> - Timing of publication of LLFs. If changes to LLFs are not published on the website in a timely manner, this may be too late for use in Settlements calculations. - If 3 years worth of LLFs data is placed in a website file (Enhancement 1, section 3.5.2), this will create files of unmanageable size (up to 150 MB) – hence our preference for files in 'Summarised' .csv format. - It would be desirable to have Scottish LLFs available on the Elexon website in the same 'Summarised' .csv file format as a precursor to a GB wide LLFs data source under BETTA. |

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| <p>Edward Coleman Powergen</p> | <p>Please provide an estimate of your costs, benefits, risks and time-scales for each of the three distinct Implementation Options identified in Section 3.1 of the Requirements Specification.</p> <p>Option 1: Cost – significant; benefits – none; risks – unquantifiable; timescales – 3 months effort</p> <p>Option 2: Cost - <5k; benefits – Elexon co-ordinate the collation of all the files in a timely fashion, single reference point for data, agreed formats, notification of updates; risks – minimal; timescales – 2 weeks effort</p> <p>Option 3: As for option 2 as we will configure our gateway not to accept the data flows via the DTN</p> <p>Which file format do your systems and processes expect the LLF data file to be in? What changes would you envisage if you had to reconfigure your systems so that they were able to process the SVA Pool File Transfer Format?</p> <p>We receive the flows in ZHD format; our gateway software configures them to ZHV for settlement system. We would need to reconfigure the files to a format acceptable by our systems if ZHV were unavailable</p> <p>If all LLF data were downloaded from the BSC Website instead of being sent over the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</p> <p>We would establish a load process – part automated, part manual – to take care of the file loading; this, as mainly an annual event, would have limited cost impact with some savings realised through non-use of the DTN; we would benefit from all the data, in the correct format, in one place at the appropriate time because Elexon would be carrying out this work. The risks are limited but Elexon must be mindful of the impact on suppliers should this not be done in a timely manner; timescales – 2 weeks development effort and 2 week concurrent process development and testing</p> <p>Do you believe that the Modification Group should consider any other Implementation Options? If so, please specify in detail, as well as providing estimated costs and time-scales.</p> <p>Not necessary</p> <p>What would be your preferred Implementation Option, if P116 were implemented?</p> <p>Option 3 is the most flexible industry option but option 2 answers our needs as well. It should be made a condition of P116 that Elexon procures and provides all the data for all the distribution businesses producing LLFs. This does not preclude Option 3 but it does give a clear direction to those suppliers who want a single data source</p> <p>Would you like to make any comments regarding the enhancements to the BSC Website or the use of ELEXON Circulars, as described in Section 3.5 of the Requirements Specification?</p> <p>No comment</p> <p>Any other comments on technical issues concerning P116?</p> |
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ANNEX 4 – P116 TRANSMISSION COMPANY ANALYSIS

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| 1 | Please outline any impact of the Proposed Modification (and, if applicable, any Alternative Modification) on the ability of the Transmission Company to discharge its obligations efficiently under the Transmission Licence and on its ability to operate an efficient, economical and co-ordinated transmission system. | We do not believe that the implementation of P116 directly effects the ability of the Transmission Company to discharge its obligations efficiently. |
| 2 | Please outline the views and rationale of the Transmission Company as to whether the Proposed Modification (and, if applicable, any Alternative Modification) would better facilitate achievement of the Applicable BSC Objectives. | In line with the above answer we have no specific views on this issue. |
| 3 | Please outline the impact of the Proposed Modification (and, if applicable, any Alternative Modification) on the computer systems and processes of the Transmission Company, including details of any changes to such systems and processes that would be required as a result of the implementation of the Proposed Modification (and, if applicable, any Alternative Modification) | The proposed modification has no direct impact on our systems or processes. We do not believe that there is a specific lead-time required for us to be able to implement P116. |
| 4 | Please provide an estimate of the development, capital and operating costs (broken down in reasonable detail) which the Transmission Company anticipates that it would incur in, and as a result of, implementing the Proposed Modification (and, if applicable, any Alternative Modification). | None identified. |
| 5 | Please provide details of any consequential changes to Core Industry Documents that would be required as a result of the implementation of the Proposed Modification (and, if applicable, any Alternative Modification). | None identified. |
| 6 | Any other comments on the Proposed Modification (and Alternative Modification if applicable). | None. |