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**Assessment Procedure**

**CONSULTATION DOCUMENT**

**MODIFICATION PROPOSAL P116**

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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

### c References

Ref.	Document Name
1	Requirements Specification for Modification Proposal P116

Copies of the above documents can be found on the ELEXON website at [www.elexon.co.uk](http://www.elexon.co.uk).

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## 1 SUMMARY

This consultation document has been prepared by ELEXON Ltd., on behalf of the P116 Volume Allocation Standing Modifications Group (P116 VASMG). It seeks to elicit responses from BSC Parties to be used during the assessment of P116.

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 Operators<sup>1</sup> (PDSO). LLF data is currently sent by the PDSOs via the Line Loss Factor Data File (the D0265 data flow or D0265), 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 amend BSC Procedure (BSCP) 528 in order to remove the obligation on PDSOs to publish LLF data via the D0265 flow to all relevant Parties, Party Agents and BSC Agents.

An initial assessment of P116 identified that the Proposed Modification should be submitted to a 3-month Assessment Procedure to be undertaken by the Volume Allocation Standing Modification Group (P116 VASMG).

The P116 VASMG met twice, on 29 January and 20 February 2003, to discuss the following issues that were identified in the Initial Written Assessment:

1. P116 would affect systems and processes currently operated by Parties, Party Agents and BSC Agents which use the D0265 flow to obtain LLF data.
2. There is a potential impact on the Data Transfer Catalogue (DTC). This could require joint impact assessments to be undertaken with the Master Registration Agreement Service Company (MRASCo).
3. P116 would increase the amount of data downloaded from the BSC Website. The impact on systems and processes operated by ELEXON needs to be assessed.
4. P116 explicitly seeks to amend BSCP 528 – "SVA Line Loss Factors For Half Hourly and Non-Half-Hourly Metering Systems Registered in SMRS". P116 could also affect BSCP 503 – "Half Hourly Data Aggregation for SVA Metering Systems registered in SMRS" and BSCP 508 – "Supplier Volume Allocation Agent".
5. P116 would place an additional legal obligation on ELEXON to become the authorised provider of LLF data to all relevant BSC Parties, Party Agents and BSC Agents. Currently, the obligation is on PDSOs to provide the data via the D0265 flow.

As a result of these discussions, the P116 VASMG issued a requirements specification seeking to determine the costs and benefits of implementing P116. The results of the detailed level impact assessment were received and circulated on 6 March 2003. The Modification Group agreed, by e-mail correspondence, that the benefits of P116 outweighed the costs. The P116 VASMG is therefore inclined to recommend that P116 should be made. This consultation document seeks to elicit responses from

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<sup>1</sup> 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.

BSC Parties so that the P116 VASMG can finalise its recommendations during its final meeting with respect of this Modification Proposal.

## 1.1 Rationale for Recommendations

Based on the results of the Impact Assessment, the P116 VASMG believe that P116 would better facilitate the achievement of the following Applicable BSC Objectives 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.

## 2 INTRODUCTION

This consultation document has been prepared by ELEXON Ltd., on behalf of the P116 VASMG. It seeks to elicit responses from BSC Parties so that the P116 VASMG can finalise its recommendations.

## 3 DESCRIPTION AND IMPACT ASSESSMENT

### 3.1 The Proposed Modification

P116 seeks to amend provisions in Section S of the Code concerning how HHDA's obtain the LLF data to be used in Settlement. Currently, the Code requires HHDA's to use LLF data provided directly by the PDSOs. LLF data is currently sent by the PDSOs via the D0265 flow, 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 amend BSCP 528 in order to remove the obligation on PDSOs to publish LLF data via the D0265 flow to all relevant Parties, Party Agents and BSC Agents.

The Proposer states 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 believes 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 DUoS charges. This issue is felt to be material especially in the case of newly licensed distributors.
- (iv) P116 would increase the accuracy of LLF data used in Settlement.

The Proposer argues that P116 would better facilitate achievement of Applicable BSC Objective:

- (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.

The P116 VASMG's analysis indicates that Applicable BSC Objective (d) should also be considered relevant during the Assessment Procedure for P116:

- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.

The P116 VASMG also note that P116 does *not* seek to alter the content of LLF data. It concerns only the method of dissemination of the data, and any consequent amendments to the BSC Website in order to increase the robustness and usefulness of the service so far as the provision of LLF data is concerned.

### 3.2 Impact Assessment Overview

P116 seeks to allow LLF data from the BSC Website to be used in Settlement. Currently, LLF data is sent over the Data Transfer Network (DTN) via the D0265 data flow or by e-mail, as well as being reported on the BSC Website. There are a number of different file formats in which the D0265 file is stored and used by BSC Parties, Party Agents and BSC Agents. For the purposes of the impact assessment, respondents needed to be aware that the D0265 file exists in at least three file formats:

1. The SVA Pool File Transfer Format, which is used by certain SVAA Applications. This type of file starts with the character string 'ZHD'. It must be noted however that the structure of the ZHD header used in this file format is slightly different from the ZHD header found in the (plain-vanilla, "non-SVA") Pool File Transfer Format. Currently, the BSC Website publishes LLF data only in the SVA Pool File Transfer Format.
2. The Pool File Transfer Format, which is distinct from the SVA Pool File Transfer Format but which also starts with the character string 'ZHD'. It must be emphasised again that the structure of the ZHD header record is different from the ZHD header record in the SVA Pool File Transfer Format.
3. The User File Format, which starts with the character string 'ZHV' or 'ZHF' depending on the variant used.

The structure of all three file formats was further explained in Section 3.2 of the Requirements Specification. It must be emphasised that the LLF file published on the BSC Website conforms to the SVA Pool File Transfer Format. It was essential that the respondents identified which file format (if any) their systems utilise, before responding to the impact assessment.

During their meeting on 20 February 2003, the P116 VASMG noted the use of various file formats and other technical details relating to the dissemination of LLF data. The Modification Group then identified three possible options for implementing P116. These options are described in the following table:

Implementation 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.

<b>3</b>	<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 file from the BSC Website.</p>
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The Impact Assessment required Parties, Party Agents and BSC Agents to estimate the costs, benefits, risks and implementation time-scales (separately for each implementation option) in terms of the systems and processes that they operate.

Please refer to the P116 Requirements Specification for details.

### 3.3 Results of the Impact Assessment

The results of the Impact Assessment indicated that Option 1 is the simplest and most preferred option. The costs and benefits specified by respondents also confirmed the VASMG's view that P116 would better facilitate BSC Objectives (c) and (d). The P116 VASMG is therefore inclined to recommend that P116 should be made and implemented via Option 1. The recommendation will be discussed further and finalised in light of the responses to this consultation document.

An Implementation Date has not yet been determined, but will take into consideration the 3 to 6 month lead-time requested by Parties.

The results of the Impact Assessment are included below:

#### 3.3.1 Participant Response

Organisation	Comments
<b>Graham Smith</b> Western Power Distribution	<p><b>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.</b></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><b>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?</b></p> <p>N/A</p> <p><b>If all LLF data were downloaded from the BSC Website instead of being sent over</b></p>

	<p><b>the DTN, what changes would you envisage to your current process? Please specify costs, benefits, risks and time-scales.</b></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><b>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.</b></p> <p>NO</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></p> <p>Either option 1 or option 2.</p> <p><b>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?</b></p> <p>NO</p> <p><b>Any other comments on technical issues concerning P116?</b></p>
<p><b>Rachel Lockley</b> 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><b>Rachael Gardener</b> Aquila Networks (PDSO)</p>	<p><b>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.</b></p> <p><b>Implementation of Option 1.</b> 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><b>Implementation of Option 2.</b> 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><b>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?</b></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><b>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.</b></p> <p>No.</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></p> <p>Implementation of Option 1.</p> <p><b>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?</b></p> <p>None.</p> <p><b>Any other comments on technical issues concerning P116?</b></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><b>Rachael Gardener</b>  Aquila Networks  (NHHDA)</p>	<p><b>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.</b></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</p>

	<p>mentioned above, we can use the D0265 data flow.</p> <p><b>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.</b></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><b>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.</b></p> <p>We cannot think of any other options.</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></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><b>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?</b></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><b>Any other comments on technical issues concerning P116?</b></p> <p>We cannot think of any technical issues currently.</p>
<p><b>Sue Calvert</b>  YEDL &amp; NEDL</p>	<p><b>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.</b></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><b>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?</b></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><b>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.</b></p> <p>I do not believe that this would affect PDSO's other than saving time processing more than one flow. Risks involved if the file is corrupted.</p> <p><b>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.</b></p> <p>NEDL and YEDL would be happy to have the D265's put on the website for a trial period.</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></p> <p>Option 2</p> <p><b>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?</b></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> <p><b>Any other comments on technical issues concerning P116?</b></p>
<p><b>Anne Stone</b> London Energy Company &amp; SWEB</p>	<p>Although this CPC has a minimal impact on Energy Branch systems we would like to support the change.</p>
<p><b>Man Kwong Liu</b> Scottish Power</p>	<p><b>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.</b></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><b>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?</b></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><b>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.</b></p> <p>The process would be more manageable. It is more efficient to download all LLFs data from a</p>

	<p>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><b>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.</b></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><b>5. What would be your preferred Implementation Option, if P116 were implemented?</b></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><b>6. 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?</b></p> <p>Yes, as described in Q4 above.</p> <p><b>7. Any other comments on technical issues concerning P116?</b></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.</p> <p>LLFs need to be published on the website in a timely manner, to ensure they are not too late for use in Settlements calculations.</p> <p>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><b>Clare Talbot</b> 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><b>Nick White</b> IMServ</p>	<p><b>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.</b></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,</p>

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.

**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?**

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.

(The file is currently processed in the Pool Transfer File Format)

**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.**

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).

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 reduce the required lead-time (3 months would be acceptable).

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.

Option 3 would require no changes on our part.

**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.**

No.

**What would be your preferred Implementation Option, if P116 were implemented?**

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.

We currently receive and load the D0265 via the DTN and would prefer to continue this process.

**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?**

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

	<p>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><b>Any other comments on technical issues concerning P116?</b></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><b>Sue Macklin</b> Scottish and Southern</p>	<p><b>Q1</b> 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 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><b>Q2</b> 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><b>Q3</b> 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><b>Q4</b> 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><b>Q5</b> 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><b>Q6</b> 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><b>Q7</b> Some issues which could be of concern are :</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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</li> </ul>

	<p>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>
<p><b>Jonathan Purdy</b> SEEBOARD Power Networks</p>	<p><b>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.</b></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><b>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?</b></p> <p>No Impact</p> <p><b>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.</b></p> <p>See 1.</p> <p><b>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.</b></p> <p>No - Option 1 is the best solution.</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></p> <p>Option 1.</p> <p><b>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?</b></p> <p><b>A.1.1 Any other comments on technical issues concerning P116?</b></p>
<p><b>Dave Morton</b> SEEBOARD Energy (late response)</p>	<p><b>Q1</b> 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><b>Q2</b> 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><b>Q3</b> 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</p>

	<p>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><b>Q4</b> 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><b>Q5</b> Option 1 is preferred with files in 'Summarised' format in .csv files.</p> <p><b>Q6</b> No comments</p> <p><b>Q7</b> Some issues that could be of concern are:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> <li>- 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.</li> </ul>
<p><b>Edward Coleman</b> Powergen</p>	<p><b>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.</b></p> <p><b>Option 1: Cost – significant; benefits – none; risks – unquantifiable; timescales – 3 months effort</b></p> <p>Option 2: Cost - &lt;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><b>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?</b></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><b>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.</b></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><b>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.</b></p> <p>Not necessary</p> <p><b>What would be your preferred Implementation Option, if P116 were implemented?</b></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><b>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?</b></p> <p>No comment</p> <p><b>Any other comments on technical issues concerning P116?</b></p>
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### 3.3.2 Response for the SVA Programme

There will be an impact on the BPM - the amount of impact depends on which option is chosen.

There will be an impact on the SVA data catalogue.

The SVA Programme currently performs the validation of LLFs for PDSOs. Options 1 and 3 would not impact this validation process (as D0265s are currently displayed on the website). However, Option 2 would mean that either:

- a) ELEXON will need to receive the D0265 in all relevant file formats for validation (as the validation also checks the structural integrity of the flow); or
- b) ELEXON would need software that would translate between SVA Pool Transfer format (the format the D0265 is currently received in by ELEXON) and other formats.

The validation process currently makes use of an Access database load utility, which can load D0265s in SVA Pool File Format and Pool File Transfer Format. It cannot load User File Formats. If solution 'a)' is chosen, this utility would need to be modified to allow the loading of the other file formats (and checking of the files' checksum). If not, the other file formats would just have to be run through a 'diff' programme, and checked to see that it contains the same LLFs as the SVA format file. This, of course, would not check that the file can be loaded by a software system (and would therefore present a risk to users). Either way, ELEXON's validation time will increase greatly, as three flows per distributor will need to be validated as opposed to one.

I am unable to give costs/timescales for changes at present - if option 2 is chosen, someone would need to be identified to modify the load utility, as no one in the SVA programme is able to do it.

Preferred options would be Option 1 or Option 3. This would minimise any impact on the SVA Programme.

3.3.3 SVA Agent Impact Assessment

<b>MP No.</b>	116	<b>Title</b>	<b>Changes to allow Line Loss Factor Data from BSC website to be used in Settlement</b>
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<b>BCA Name</b>	Clive Mallinson	<b>Assessor</b>	SVA Agent	<b>Date</b>	05/03/03
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<b>Costs</b> Not applicable. See comments below.
<b>Timescale implications</b> Not applicable.
<b>Risks</b> Not applicable.
<b>Comments</b> Jon Bell of ELEXON has confirmed to the SVA Agent that this proposal will not affect the existing Line Loss Factor (LLF) data file checking and loading processes for either annual or ad-hoc D0265 files. This proposal relates to the distribution of LLF data after it has been checked by ELEXON and validated by the SVA Agent loading the D0265 into the ISRA system. It will therefore have no impact on the SVA Agent.
<b>Recommendation</b> Not applicable.