

## CPC00646 – Impact Assessment Responses for DCP0038.

### DCP0038 - Use of Appointment and Termination Flows in Unmetered Supplies (UMS)

#### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No
Western Power Distribution	UMSO	Yes
Central Networks	LDSO, UMSO	Yes
Independent Power Networks Limited	UMSO	Yes
Electricity North west Ltd	LDSO	Yes
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes
ScottishPower	UMSO, Supplier, NHHDC, NHHDA	Yes
E.ON UK	Supplier	Yes
Npower	Supplier, Supplier Agents	Yes
British Energy	Supplier	-
E.ON UK Energy Services Limited	NHHDC DA MOA	Neutral
United Utilities Networks Ltd - Metering	Meter Administrator	Neutral
CE ELECTRIC	LDSO, UMSO	Neutral
Gemserv	MRASCo Ltd.	Neutral

#### Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact Yes/ No	Days Required to Implement
Western Power Distribution	Yes	<p><b>Comments on Option a:</b> This would be our preferred option as it is the closest fit to what we do now.</p> <p><b>Comments on Option b:</b> We don't see any benefit in getting the</p>	No	30

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		<p>D0148 as we rely on MPAS for this information.</p> <p><b>Comments on Option c:</b> This option would be less reliable than option A.</p> <p><b>Comments on Option d:</b> Do not support this option at all. We don't want a lot of different, bilateral agreements between UMSO and Suppliers.</p> <p><b>Preferred Option:</b> a. We already have to rely on MPAS to get the information we need and have adapted our procedures accordingly. Therefore option a is the least change for us and, in our view, the most robust solution.</p> <p><b>Impact on Organisation:</b> Documentation change to reflect the new formal process.</p>		
Central Networks	Yes	<p><b>Preferred Option:</b> a rationale: Our UMS systems are updated from MPRS. We have no need to receive appointment flows from suppliers.</p>	No	Immediate
Independent Power Networks Limited	Yes	<p><b>Comments on Option a:</b> Most effective solution at lowest perceived cost – we currently use SMRS (MPRS) to check that the agents have been appointed.</p> <p><b>Comments on Option b:</b> We do not believe that retaining / removing some of the data flows is a good idea so would not support this option.</p> <p><b>Comments on Option c:</b> This would be an acceptable solution but would expect the cost to be higher to implement than Option A.</p> <p><b>Comments on Option d:</b> This option gives no comfort that the relevant data would be sent, or put in place through any industry standard mechanism for capturing the data.</p> <p><b>Preferred Option :</b> a rationale: Most effective solution at lowest perceived cost.</p> <p><b>Impact on Organisation:</b> If Option A is used, we would not have to</p>		TBA by suppliers

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		<p>make any changes to our processes.</p> <p><b>Implementation:</b> If option a is used, we would be happy to accept the amount of required notice stated by the suppliers as they will need to amend their processes.</p>		
Electricity North west Ltd	Yes	<p><b>Comments on Option a:</b> This would be the simplest solution for us at it would require a small process change only</p> <p><b>Comments on Option b:</b> This option would retain the requirement of the supplier to send a D0148</p> <p><b>Comments on Option c:</b> Modifying the DTN to allow data flows direct to the UMSO from the supplier would require a major change to the internal data handling system. It would therefore be the most costly solution and difficult to justify.</p> <p><b>Comments on Option d:</b> This option is suggesting that we carry on with what we already have but with some minor modification which need to be agreed between Supplier and UMSO.</p> <p><b>Preferred Option:</b> a</p> <p><b>rationale:</b> This would be the simplest option as it would not involve system changes</p> <p><b>Impact on Organisation's Systems and/or Processes? Yes</b></p> <p><b>Impact on Organisation :</b> If Option A is adopted then process change If Option C is adopted will involve system changes</p> <p><b>Comments</b> if option C is adopted otherwise very little time required to implement a simple process change</p>	Yes	243
Scottish and Southern Energy	Yes	<p><b>Comments on Option a:</b> If there is no notification, UMSOs will not know when to check SMRS thereby placing onus on UMSOs to check SMRS for everything. There is no means of monitoring or controlling</p>		3-12 months

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		<p>changes.</p> <p><b>Comments on Option b:</b> This may reduce the issue but would not address it.</p> <p><b>Comments on Option c:</b> Costs and implementation issues with system and process changes.</p> <p><b>Comments on Option d:</b> Seems a more pragmatic approach which we would prefer.</p> <p><b>Preferred Option and supporting rationale</b> Option d</p> <p><b>Impact:</b> Supplier and UMSO</p> <p>Changes to processes on all options. System changes will be required for option c.</p> <p><b>Implementation:</b> For option c, we would require up to 12 months, shorter timescales for the other options.</p>		
ScottishPower Energy Management Ltd	Yes	<p><b>Comments on Option a:</b> ScottishPower extract the information supplied within the flows from MPRS and on this basis we would support removing the requirement to send and receive the three flows. From a Supply perspective these flows appear to be used by few UMSOs and the removal of the obligation to send such flows would seem the sensible approach.</p> <p><b>Comments on Option b:</b> As ScottishPower UMSO presently use MPRS for such information, as detailed above, we would not be in favour of retaining the D0148 as this is superfluous to our day to day operation.</p> <p><b>Comments on Option c:</b> SP would not support such a change. The addition of these flows to be sent to the UMSO over the DTN would result in sizeable costs for no benefit</p> <p><b>Comments on Option d:</b> As stated above we do not require notification of such changes from other Parties and therefore changing the process to such an informal manual method would offer no benefit</p>	yes	90

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		<p>to either the UMSO or the Supplier and could in fact add further complication to the current manual process for all Parties</p> <p><b>Preferred Option</b></p> <p>Option (a) removes the requirement to send unnecessary, superfluous flows, will have negligible impact on internal processes and reduce costs to both the Supply and UMSO business.</p> <p>Option (a) fits well with SP UMSO's current process of using reconciliation reports generated from MPRS for this purpose.</p> <p><b>Impact</b> Supplier, UMSO, NHHDA</p> <p>There will be minor changes required to internal processes.</p>		
E.ON UK	Yes	<p><b>Comments on Option a:</b> We believe this is the best option presented</p> <p><b>Preferred Option:</b> A - This would mean that the UMSO would obtain their data from MPAS and that by legitimising this as the correct course of action, it would in part eliminate issues involving different data being sent to different agents and could in due course add weight to any future action on our part to have all UMSO set-ups appointed from MPAS.</p> <p><b>Impact:</b> Supplier - System impacts</p>	yes	6 months
NPower Limited	Yes	<p><b>Comments on Option a:</b> Low system impact Review automation of internal systems.</p> <p>Risk of error due to UMSO appointment and D0148 information being totally reliant on the MPAS view.</p> <p>If MPAS was updated later than expected (perhaps due to D0203) is there a possibility that the UMSO MPAS check would be erroneous?</p> <p>Would suggest that if this is implemented that clear guidelines are produced on when an UMSO should check MPAS.</p> <p>What is trigger for UMSO to send D0052 on a new connection? Will this fit in with current BSCP timescales?</p> <p>If DCP is relating to HH and the MA is updated as MOP in MPAS how</p>	Yes	-

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		<p>would Supplier choose preferred UMSO?</p> <p><b>Comments on Option b:</b> Low system impact but still need to turn off some of the automation within Internal Systems. Some risk of error due to UMSO appointment being totally reliant on the MPAS view. If DCP is relating to HH and the MA is updated as MOP in MPAS how would Supplier choose preferred UMSO? Suppliers wouldn't be able to appoint UMSO out of patch, as they won't be actively appointing. What is trigger for UMSO to send D0052 on a new connection? Will this fit in with current BSCP timescales? Would suggest that if this is implemented that clear guidelines are produced on when an UMSO should check MPAS. Assumed that this Solution is complimented with a change to allow D0148's to process with UMSO/MA in the current MOP field.</p> <p><b>Comments on Option c:</b> High system impact - potentially expensive.</p> <p><b>Comments on Option d:</b> Low system impact. We would not want to see the D0155 removed because Suppliers need the D155 to appoint the UMSO (to Accept D11). Otherwise UMSO will not know who have been appointed; and lead to future misunderstandings. Similarly D151 needs to be retained for se-appointing. Risk that Suppliers would have to manage multiple processes for different UMSOs and therefore would prefer that an Elexon process is followed.</p> <p><b>Preferred option:</b> b or d</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Other Comments:</b> Please clarify - does this change relate to NHH/HH or both. - We assume both but this isn't stated explicitly.</p>		

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		<p>The Solution Catalogue (pg 16) references Section 3.1.21 (UMSO to send P0207) and 3.8.6 (NHH De-Appointment of DC, DA, UMSO following Disconnection by Supplier). Please clarify that this DCP relates to both NHH/HH and all situations where UMSO/MA/DC/DA would be appointed/de-appointed e.g. COS/New Connection etc.</p> <p>We are assuming that for HH the MA is appointed within MPAS as the MOP rather than the UMSO(not currently clear in BSCP 520).</p> <p>Sprite sends an automatic email to UMSO giving the appointment flow info.</p>		
British Energy	-	<p><b>Comments on Option a:</b> We do not consider this to be an appropriate solution as Supplier's would have no assurance that UMSO's were using current up-to-date data. Supplier's would have no visibility of how often UMSO's referred to SMRS data to process updates. This solution also fails to take account of any rejected updates to SMRS that should have been applied. This also increase inconsistencies in ways of working between metered and un-metered supplies.</p> <p><b>Comments on Option b:</b> We do not consider this to be an appropriate solution as Supplier's would have no assurance that UMSO's were using current up-to-date data. Supplier's would have no visibility of how often UMSO's referred to SMRS data to process updates. This solution also fails to take account of any rejected updates to SMRS that should have been applied. This also increaes inconsistencies in ways of working between metered and un-metered supplies.</p> <p><b>Comments on Option c:</b> We have previously provided our view, in other consultations, that the only appropriate way to resolve this issue is to amend the relevant flows to enable use of the DTN from Supplier to UMSO.</p> <p><b>Comments on Option d:</b> Could potentially produce many different ways of working and therefore practically not a feasible solution.</p> <p><b>Preferred Option:</b> As previously stated Option C is the only workable</p>	-	-

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		<p>solution, implementing Option C will ensure that there is consistency in ways of working for metered and un-metered supplies.</p> <p>All other agents send and receive flows via the DTN therefore to ensure that UMSO are consistent Option C is the only viable option.</p> <p>Supplier's would have no visibility of how often UMSO's referred to SMRS data to process updates. This solution also fails to take account of any rejected updates to SMRS that should have been applied" from Option A above.</p>		
CE ELECTRIC	Neutral	<p><b>Comments on Option a:</b> Appointment and termination data flows in UMS - Agree change. We use data derived from MPAS and do not use the flows. At present we only receive the flows from one supplier and they are not utilised.</p> <p><b>Comments on Option c:</b> Would not utilise data flows.</p> <p><b>Preferred Option</b> A – as above</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> No</p> <p><b>Capacity in which Organisation is impacted</b> UMSO</p> <p><b>Impact on Organisation:</b> Yes if change to DTN required.</p>	Yes	It will vary depending on which option is selected. If change to DTN required we would prefer 6 months