



## Change Proposal Circular

### CPC00709: Impact Assessment of CP1368

#### Responses for CP1368 Clarify/Resolve Operational Issues Related to Unmetered Supplies in SMRS

##### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	Yes	30
Electricity North West Ltd	LDSO	Yes	Yes	180
npower	Supplier and HH & NHH Agents	Neutral	No	n/a
Power Data Associates Ltd	Meter Administrator	Yes	Yes	n/a
Scottish Power	Supplier, HHDC, HHDA	Yes	Yes	n/a
SSE	Supplier	Yes	No	60
UK Power Networks	LDSO + UMSO	Yes	Yes	n/a
Western Power Distribution	LSDO	Yes	Yes	30

**Any Questions**

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<b>Detailed Impact Assessment Responses CP1368</b>			
<b>Organisation</b>	<b>Agree?</b>	<b>Impacted?</b>	<b>Comments</b>
EDF Energy	Yes	Yes	<p><b>Agree change comment</b> – Yes, if proposed solution 3 is approved.</p> <p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> – Updates to our business process.</p> <p><b>Lead time comment</b> – 30</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> –n/a</p>
Electricity North West Ltd	Yes	Yes	<p><b>Agree change comment</b> – These changes will improve the unmetered supplies processes by providing clarification to the siting of a PECU Array, the validation and indeed audit of a customer’s inventory/ EAC calculation, the issuing of a D205 by the Supplier on a change of MA and by the removal of the need for an UMSO to issue the P0068 EM Technical Details to Suppliers.</p> <p><b>For which role is your organisation impacted?</b> UMSO</p> <p><b>Please state what the impact is</b> – Low impact.</p> <p><b>Lead time comment</b> - 180</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact.</p> <p><b>Associated costs comment</b> – Low cost.</p> <p><b>Any other comments</b> - No further comments to add.</p>

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Detailed Impact Assessment Responses CP1368			
Organisation	Agree?	Impacted?	Comments
Power Data Associates Ltd	Yes	Yes	<p><b>Agree change comment – Yes</b>            With the exception of new section 4.4.4 within BSCP520, the change better reflects current practice. There are concerns about the adjustment of EACs and summary inventories to reflect audit results. The principle is sound but it is believed that greater clarity is required around the adjustment. Please see later comments.</p> <p><b>For which role is your organisation impacted?</b> Meter Administrator</p> <p><b>Please state what the impact is –</b> Impact is minimal; the change better reflects current practice.</p> <p><b>Lead time comment -</b> As above, no change to current practice.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b>            Yes, without clarity around the summary inventory adjustment it may be difficult to provide our customers with details of the changes that occur between inventory submissions and separate out the impact that the uplift is having upon their energy consumption.</p> <p><b>Associated costs comment –</b> None</p> <p><b>Any other comments –</b>            Section 4.4.4 and the MUESLI document are silent on the details of how the summary inventory, used to calculate either the EAC for NHH trading or the half hourly advances for HH trading, will be adjusted. The MUESLI document details how to calculate a correction factor that will be applied but not how this correction factor will be applied to the summary inventory.</p> <p>We feel it is essential that any uplift to the summary inventory be clearly identified. Our preference would be for an 'Uplift' charge code within the summary inventory to be explicitly added that represents the consumption adjustment. This has the benefit that the uplift can be both identified and quantified by the customer very easily. It still allows for detailed analysis of the basic inventory information relative to previous inventories to be carried out, i.e. that 400 45W Cosmo lamps have been added since the last submission. It also helps to avoid confusion where there are multiple types of equipment in the inventory but only one sub</p>

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Detailed Impact Assessment Responses CP1368			
Organisation	Agree?	Impacted?	Comments
			<p>set has been audited. For example, it is common for a single inventory to include street lights, traffic signals, signs, bollards, school crossing patrol flashers, etc... It is likely that audits will focus mostly on street lighting. Where the uplift only applies to street lighting, merely increasing the number of each street light charge code can be confusing, determining what has and has not been uplifted. It also makes it difficult for the customer comparing their new 'uplifted' inventory with the previous one as they may have made changes to reflect work carried out on the street and then also seen an uplift applied as well. It will also assist supplies to engage in discussion with customer as to why the consumption has increased, and encourage the customer to revise and 'correct' their inventory to enable the explicit item to be removed.</p> <p>We believe that this section requires more detail to ensure that each UMSO is directed to use a common methodology and that the correction factor that is being applied is clear to all parties. This will help make the customer's energy charges a lot more transparent, whilst providing them with a clear incentive to fix their inventory issues. Suggested changes to the red lined text of BSCP520 are given below, plus an additional change to BSCP520.</p>
Scottish Power	Yes	Yes	<p><b>Agree change comment – Yes</b></p> <p><b>For which role is your organisation impacted?</b> UMSO</p> <p><b>Please state what the impact is –</b> New requirement to check inventory items against valid dimming combination spreadsheet. However it is noted that this spreadsheet is still in development phase and requirements/specifications are not yet clear.</p> <p>We also note introduction of new control procedure to monitor any change of MA via supplier D0205 flow, as a result of this we will be required to introduce a new internal control procedure to monitor the change of MA.</p> <p><b>Lead time comment –</b> n/a</p>

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Organisation	Agree?	Impacted?	Comments
			<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Minimal Impact <b>Associated costs comment</b> – No cost implications <b>Any other comments</b> – n/a</p>
SSE	Yes	No	<p><b>Agree change comment</b> – Yes <b>For which role is your organisation impacted?</b> n/a <b>Please state what the impact is</b> – n/a <b>Lead time comment</b> – 60 <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> n/a <b>Associated costs comment</b> – n/a <b>Any other comments</b> –n/a</p>
UK Power Networks	Yes	Yes	<p><b>Agree change comment</b> – Yes - The CP brings the BSCP in line with industry/customer agreed and documented practice in terms of the auditing of unmetered supply inventories with associated positive impacts on Settlement accuracy. It clarifies a variety of issues with respect to Equilient Meters whilst removing redundant clauses such as the forwarding of EM Technical Setails to Suppliers. For the avoidance of doubt it also reinforces UMSO validation obligations. <b>For which role is your organisation impacted?</b> - LDSO + UMSO <b>Please state what the impact is</b> – The impact is entirely positive. The CP provides a mechanism for</p>

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Detailed Impact Assessment Responses CP1368			
Organisation	Agree?	Impacted?	Comments
			<p>LDSOs/UMSOs to justify physical audits of major unmetered supply customers. Settlement will no longer remain inaccurate for months or years in the event that customers either unduly prevaricate or wholly refuse to cooperate in respect of correcting their inventories.</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> - No</p> <p><b>Associated costs comment</b> – No further costs are envisaged over current system functionality.</p> <p><b>Any other comments</b> – None</p>
Western Power Distribution	Yes	Yes	<p><b>Agree change comment</b> - Yes</p> <p><b>For which role is your organisation impacted?</b> UMSO AND MA</p> <p><b>Please state what the impact is</b> - MINIMAL – some procedural changes.</p> <p><b>Lead time comment</b> - 30</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – COST WOULD BE MAINLY ADMINISTRATIVE &lt;£1000</p> <ul style="list-style-type: none"> <li>• Update Validation tables</li> <li>• Update Working Procedure documents</li> </ul> <p><b>Any other comments</b> – n/a</p>

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<b>Comments on the redline text CP1368</b>					
<b>No.</b>	<b>Organisation</b>	<b>Document name</b>	<b>Location</b>	<b>Severity Code</b>	<b>Comments</b>
1	Power Data Associates Ltd	BSCP520	3.3.1.5	H	The agreed geographical location will always be required irrespective of whether the EM is passive or dynamic. In a dynamic EM it is used to calculate switching times for time switches or for default arrangements in the event of PECU array failure. Suggest deletion of "in the event of Passive HH Trading."
2	Power Data Associates Ltd	BSCP520	3.4.1	L	Although not part of the change, suggest alignment of the flows against the two parties could be improved.
3	Power Data Associates Ltd	BSCP520	3.14.4	L	Suggest action should read "Send corrected data <b>calculated</b> in accordance with 3.9.1.1"
4	Power Data Associates Ltd	BSCP520	4.1, 4.2 and 4.3	L	These do not read well, and are misleading, until you realise the reference to Charge codes and Switch Regimes is a hyperlink. The hyperlink should be entitled "Charge Codes and Switch Regimes page of the BSC website".
5	Power Data Associates Ltd	BSCP520	4.4.4	H	The hyperlink to the ILP website does not work. They have recently re-launched their website and the new link is "https://www.theilp.org.uk/documents/unmetered-electricity/"
6	Power Data Associates Ltd	BSCP520	4.4.4	H	The following alternative texts are supplied as per our response to Question 6 above.

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Comments on the redline text CP1368					
No.	Organisation	Document name	Location	Severity Code	Comments
					<p>The our preferred approach ensures that the additional 'uplift' consumption is clearly visible to all parties and that the appropriate correction factor is applied to Half Hourly and Non Half Hourly inventories.</p> <p>The preferred approach involves an additional section in the OID and creation of a single 'consumption adjustment' charge code rated at 1,000 circuit watts for use in consumption adjustments.</p> <p><b><u>Preferred Approach</u></b></p> <p>4.4.4 Consumption Adjustments following LDSO Inventory Audits</p> <p>Where an audit of a customer's inventory has been undertaken by the LDSO in accordance with the best practice document: Managing Unmetered Energy Street Lighting Inventories (MUESLI) published on the Institute of Lighting Professionals website:</p> <p>ILP Website</p> <p>then the UMSO will prepare a revised inventory by applying any correction factor calculated in accordance with, and as defined, in the above best practice document.</p> <p>The Operational Information Document details the methodology for applying a correction factor to the existing inventory to produce a</p>

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					<p>revised inventory as required by this paragraph.</p> <p>The Customer will be deemed to have agreed that the revised inventory of Apparatus relative to that particular Unmetered Supply is that agreed between the LDSO on whose Distribution System or Associated Distribution System the Unmetered Supply takes place and the Customer taking such supply as defined in paragraph 8.2.4 of Section S8 of the BSC.</p> <p><b><u>Paragraph for OID</u></b></p> <p>Where it has been agreed that a revised inventory will be prepared in accordance with Section 4.4.4 of BSCP520, the UMISO shall calculate the load in watts per switch regime listed in the existing summary inventory.</p> <p>To determine the above load, the circuit watts for all charge codes with the same switch regime will be multiplied by the number of items for each charge code and totalled. The total load per switch regime will be multiplied by the correction factor to derive the new total load for that switch regime. The difference between the two will be the audit adjustment.</p> <p>An entry per switch regime in the original inventory will then be added to the summary inventory using the 1,000 watt consumption adjustment charge code to represent the increased load (audit</p>

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					<p>adjustment) per switch regime. This additional load when used within the equivalent meter, or the EAC calculation, will result in the increased consumption determined by the audit.</p> <p>In the following simple example if an inventory only contained 2,000 items with a circuit rating of 80W and 5,000 items with circuit rating of 50W against switch regime 821, the total load in watts for switch regime 821 would be <math>((2,000 \times 80) + (5000 \times 50))</math> 410,000 watts. Applying a correction factor of 1.12 increases the load to 459,200 watts. An entry of 49 items, using the switch regime 821 &amp; the consumption 'uplift' charge code (of 1000 watts), will be added to the inventory to produce the revised inventory.</p> <p>This approach is to be used for both Half Hourly and Non Half Hourly inventories. A uniform approach prevents issues with customers switching from one method of trading to the other.</p>
7	Power Data Associates Ltd	BSCP520	3.2.3	H	<p>In order to respond to customer queries it should be visible to a MA that a revised summary inventory has been prepared in accordance with 4.4.4.</p> <p>In the action column of 3.2.3 we suggest the inclusion of the following.</p> <p>"Where the revised summary Inventory details have been prepared in accordance with 4.4.4, the UMSO shall provide details of the</p>

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					correction factor used in its preparation"
8	Power Data Associates Ltd	BSCP520	4.5.1.1	L	In the first sentence of the paragraph headed Research, replace "inform" with " <u>determine</u> ".
9	Scottish Power	BSCP520	1.2.1(q)	L	As stated in our response to Q2b above, we recognise that the Valid Dimming Combination spreadsheet is still in development phase and requires to be in place by the proposed implementation date of 1 November 2012.
10	Scottish Power	BSCP520	3.1.1	L	As above
11	Scottish Power	BSCP520	3.4.3	L	ScottishPower will be required to implement a new internal control process to monitor this change.
12	Scottish Power	BSCP520	4.5.1.1 PECCU Array Variations	M	Within the PECU Array Variations it suggests that if there is a variation in the number of PECU arrays proposed by the MA, (previously Supplier), how will the MA notify multiple suppliers, or as if suggested Sharing PECU Arrays, what if the MA is not the lead MA, who has the responsibility for advising all MA's.

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