



Change Proposal Circular – Collated Responses for CPC00712

CPC00712: Impact Assessment of CP1374

Responses for CP1374: Pre-site audit visits - Technical Assurance of Metering

Summary of Responses CP1374				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
E.ON	Supplier / Generator / Trader / Consolidator / Exemptable Generator	Yes	No	n/a
EDF Energy	Supplier	No	Yes	365
Electricity North West Limited	Distributor	Neutral	n/a	n/a
EnDCo	Supplier (X)	Yes	No	n/a
IMServ Europe Ltd	MOP	No	Yes	100
ScottishPower	Generator	Yes	No	n/a

**Any Questions**

If you have any queries, please contact:

CCC@elexon.co.uk

Or contact:

BSCP40 Change Process Task Leader**020 7380 1435**

Detailed Impact Assessment Responses CP1374			
Organisation	Agree?	Impacted?	Comments
E.ON	Yes	No	<p>Agree change comment – Yes It seems sensible.</p> <p>For which role is your organisation impacted? n/a</p> <p>Please state what the impact is – n/a</p> <p>Lead time comment - None</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? - None</p> <p>Associated costs comment – None</p> <p>Any other comments – n/a</p>
EDF Energy	No	Yes	<p>Agree change comment – No</p> <p>Exelon issued guidance some while ago that pre-audit visits are unacceptable so we do not carry them out anymore and have not done for some while. We believe that most MOPs follow this same process. Therefore it would seem that this CP has been raised to change the process for the majority of MOPs against the advice previously issued by ELEXON.</p> <p>Every Mop receives a Monthly Mop Busrr (Business Unit Settlement Risk Register) and we believe that Exelon could target the individual Mops that are scoring badly on SR28 on a consistent basis rather than introducing costly changes to everyone. In addition one alternative solution could be to add a line into BSCP27 stating</p>

CPC00712
25 May 2012
Version 1.0
Page 2 of 6
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Organisation	Agree?	Impacted?	Comments
			<p>that participants must not carry out pre-audit site visits.</p> <p>For which role is your organisation impacted? MOP</p> <p>Please state what the impact is – System and process changes will be required</p> <p>Lead time comment - 365</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? - Yes, we don't believe we have the resource to complete this work without 1 years notice</p> <p>Associated costs comment – We do not wish to provide costs of this change, even to be treated confidentially</p> <p>Any other comments – n/a</p>
Electricity North West Limited	Neutral	No	<p>Agree change comment – Neutral</p> <p>For which role is your organisation impacted? n/a</p> <p>Please state what the impact is – n/a</p> <p>Lead time comment – n/a</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – n/a</p> <p>Associated costs comment – n/a</p>

CPC00712
25 May 2012
Version 1.0
Page 3 of 6
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Organisation	Agree?	Impacted?	Comments
			Any other comments – None
EnDCo	Yes	No	Agree change comment – n/a For which role is your organisation impacted? n/a Please state what the impact is – n/a Lead time comment - None Would implementation in the proposed Release have an adverse impact on your organisation? - No Associated costs comment – None Any other comments – n/a
IMServ Europe Ltd	No	Yes	Agree change comment – No We agree that Meter Operators who intentionally preform Pre-TAA site inspections are acting inappropriately and the suggestion that this practice still happens is very concerning as it shows that despite PABs efforts we still don't have a level playing field. We would like to see this issue resolved, however we don't think the proposed change is the best way forward. Managing the TAA process is already very manual and onerous task and this proposed addition stage would only compound this issue. We are concerned that this change has been proposed to deal with the actions of a minority group and as a

CPC00712
25 May 2012
Version 1.0
Page 4 of 6
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			<p>result all Meter Operators will be significantly impacted as, to meet the proposed requirements in CP1374 Meter Operators will need to permanently monitoring all activity on all TAA notified sites. If a Meter Operator has no history of carrying out carrying out pre-visits on TAA notified site then we believe the continual monitoring is an inappropriate stage in the process.</p> <p>For which role is your organisation impacted? Meter Operator</p> <p>Please state what the impact is – If we were to implement this CP there would be significant increase in manual monitoring of TAA notified sites.</p> <p>Lead time comment – 100 - New reporting required</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? - Yes, would require the development of additional reporting and also additional resource to review/manage the process, this we believe is all an unnecessary as UKDC do not intentionally pre-visit TAA notified sites.</p> <p>Associated costs comment – N/A</p> <p>Any other comments –</p> <p>As alternative to CP1374 we think it more appropriate to change BSCP27 so it states that:</p> <ol style="list-style-type: none"> 1) Prior to site visit the TAA may request the details of any planned work on the metering system during the notification period. 2) Following a site visit the TAA may request the details of any work which has taken place during the notification period.

CPC00712
25 May 2012
Version 1.0
Page 5 of 6
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			If this approach were to be adopted we believe the TAA would have the ability to monitor pre-TAA site visit activity, the TAA could appropriately monitor specific organisations but at the same time the responsibility for continually monitoring and notifying TAA of all activity wouldn't be unnecessarily placed on all Meter Operators.
ScottishPower	Yes	No	Agree change comment – Yes For which role is your organisation impacted? Distributor Please state what the impact is – n/a Lead time comment – n/a Would implementation in the proposed Release have an adverse impact on your organisation? – n/a Associated costs comment – n/a Any other comments – n/a

No Comments on the redline text for CP1374

CPC00712
25 May 2012
Version 1.0
Page 6 of 6
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