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Any Questions
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Change Proposal Circular – Collated Responses for CPC00723

CPC00723: Impact Assessment of CP1386v2.0

Responses for CP1386v2.0 Improving Settlement Accuracy for Unmetered Supply on a Change of Supplier or Change of Agent

Summary of Responses for CP1386v2.0

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Agree Implementation approach?
Power Data Associates	MA	Yes	No	Yes
IMServ	NHHDC	Yes	Yes	Yes
Electricity North West Limited	Distributor/UMSO	Yes	Yes	Yes
Western Power Distribution	LDSO	No	Yes	Neutral
ScottishPower	LDSO and UMSO	No	Yes	Yes
TMA	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	Yes
Southern Electric Power Distribution (SOUT) Scottish Hydro Power Distribution (HYDE)	Distributor	Yes	No	Yes
Northern Powergrid	LDSO, UMSO	No	Yes	Yes
British Gas	Supplier	Yes	No	Yes

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response/Recommendation**
Power Data Associates	Yes	No	**Do you agree with the Change?** Yes because it will improve the accuracy of EACs for unmetered supplies, benefiting all parties including all UMS customers. **Do you agree with the Implementation approach?** Yes **Do you have any other comments?** It may be worth considering an addition to BSCP515 which captures all the obligations placed upon the LDSO. Whilst the LDSO, SMRA & UMSO services are all part of the Distribution Network Operator business, it is possible that an obligation placed upon the LDSO may be overlooked if it is not in the relevant BSCP.	Noted. We do not believe amendments to BSCP515 are necessary given that LDSO obligations relating to UMS were not intended to be covered in BSCP515. Therefore the changes to BSCP501 do not create any inconsistencies and the resulting risk of LDSOs overlooking the proposed obligations is minimal. Furthermore, additional changes to BSCP515 as part of CP1386 at this stage would require a further iteration of the CP, which the Proposer has decided against to avoid delaying a decision on the CP.
IMServ	Yes	Yes	**What are the associated costs on your organisation to implement the change?** Minimal Impact **Do you agree with the Implementation approach?** Yes	Noted – No action required.
Electricity North	Yes	Yes	**How is your organisation impacted?**	Noted – No action required

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response/Recommendation**
West Limited			We will need to amend our current process to ensure we can produce and send D0052's within 5 WD of the CoS. It should be noted that our current process is manual. **What are the associated costs on your organisation to implement the change?** There will not be any additional costs associated with amending the manual process. **Do you agree with the implementation approach?** Yes	
Western Power Distribution	No	Yes	**Do you agree with the change?** No, because it attempts to solve the problem of NHHDC not doing their job properly by placing the obligation on a different party to do it instead. The correct resolution to the issue this CP deals with is to improve the NHHDC processes so that the workaround is not needed. Suppliers and their agents should address their own performance issues rather than trying to place the cost and effort of dealing with it on to the LDSO. **Is your organisation impacted?** Yes **How is your organisation impacted?** It places an increased burden on the UMSO service. **What are the associated costs on your organisation to**	Noted – This is a reiteration of the comments raised against CP1386v1.0, in that they do not support the CP as in their view the change is moving UMS EAC responsibility away from the NHHDC onto the UMSO. The Proposer notes this comment but reiterates that that CP1386v2.0 is formalising an existing workaround to ensure the NHHDC has the most up to date EAC in place, therefore improving the accuracy of UMS Settlement.

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response/Recommendation**
			implement the change? Implementation cost will be around £5000 and there will be on-going operational costs of a similar amount per annum. **Do you agree with the implementation approach?** Neutral	
ScottishPower	No	Yes	**Do you agree with the change?** No - ScottishPower agree in principle with the change in that it attempts to ensure UMS EAC information is efficiently exchanged between the parties. However a number of changes have been added that give us cause for concern and these are noted below. **Is your organisation Impacted?** **Yes** **How is your organisation impacted?** LDSO and UMSO. Requirement to change internal procedures to ensure new requirements can be met. **What are the associated Costs on your organisation to implement this change?** Minimal. The changes required in the main match what is already carried out within ScottishPower existing processes. However, the order of Registration events has changed and this is likely to cause reworks and potential unwinding of registrations that are completed prior to the existing (and what	Noted – Following discussions with the Proposer some of the recommended revisions to the redlined text, go part the way towards addressing the comments raised by ScottishPower. However it has not be possible to address all comments raised.

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response / Recommendation**
			we believe to be necessary) checks being carried out. **Do you agree with the implementation approach?** Yes **Do you have any other comments?** None other than those included within the Reviewer Comments below.	
TMA	Yes	Yes	**Do you agree with the change?** Yes The formalisation of the existing workaround provides clarity to the process and should ensure that UMS do have better quality data earlier in settlement **Is your organisation Impacted?** Yes **How is your organisation impacted?** Yes The formalisation of the existing workaround provides clarity to the process and should ensure that UMS do have better quality data earlier in settlement **What are the associated Costs on your organisation to implement this change?** Low Cost **Do you agree with the implementation approach?** Yes	Noted – no action required

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response/Recommendation**
Southern Electric Power Distribution (SOUT) Scottish Hydro Power Distribution (HYDE)	Yes	No	**Do you agree with the change?** Yes - this is SSE Power Distribution's current procedure. **Do you agree with the implementation approach?** Yes	Noted - no action required.
Northern Powergrid	No	Yes	**Do you agree with the change?** No, we have concerns relating to the requirement to align the EAC effective from date to the Supplier / NHHDC effective from dates, we do not believe this would be the true EAC effective from date and we would require a significant change to internal systems to accommodate this. We believe that the NHHDC should align the EAC effective from date to the Supplier / NHHDC effective from date as set out in the BSC currently. We agree that timescales are required for sending the D0052 flow, however we noted that the timescales defined within BSCP 520 for sections 3.3.2.7 and 3.5.7 differ between 5 WD and 10WD; we believe that the same timescales should apply to both requirements for consistency. **Is your organisation Impacted?** Yes – as above	Noted. Following discussions with the proposer, recommend changing the process step description of 3.5.7 from: Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new NHHDC appointment date To: Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the Supplier Start Date. Following discussions with the proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 with timescale in 3.3.2.7 to 10WDs, for better consistency.

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Detailed Impact Assessment Responses CP1386v2.0				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON Response/Recommendation**
			How is your organisation impacted? Yes – as above **What are the associated Costs on your organisation to implement this change?** Not quantified, however if the requirement to align EAC effective from dates is agreed this would be a significant figure. **Do you agree with the implementation approach?** Yes	
British Gas	Yes	No	**Do you agree with the change?** Yes because this will ensure the UMSO can pass the D0052 to the correct DC **Do you agree with the implementation approach?** Yes **Do you have any other comments?** We are in agreement of this proposal as it seeks to mandate UMSO's to send on the D0052 to the NHHDC. This has not always happened in the past leaving the Supplier to constantly chase the UMSO for the D0052 flow.	Noted – no action required.

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Comments on the redline text CP1386v2.0					
No.	**Organisation**	**Document name**	**Location**	**Comments**	**ELEXON Response/Recommendation**
1	Power Data Associates	BSCP504	3.4.1.1	The Supplier sending a D0205 to SMRA isn't relevant here. It's not part of the collection activities. Suggest deletion.	Noted, however this change is not required and is outside of the scope of the CP. The CP1386 v2.0 changes to BSCP504 split out the proposed UMSO activity (sending the D0052) from the existing requirement on the Supplier to send the D0205. Any changes to the sending of the D0205 would require a separate CP.
2	Power Data Associates	BSCP504	3.4.1.1	In footnote 2 the "or Supplier" has been correctly deleted as only the UMSO should send a D0052 for an unmetered supply. However the footnote goes on to say that the D0052 from the UMSO should be used in preference. Suggest the whole of the last sentence could be deleted.	Noted – Following discussions with the Proposer, no change is being recommended as, while the CP is mandating the UMSO to send the D0052, there may be other circumstances where a NHHDC has to use information other than the D0052. So leaving the sentence in the footnote keeps it clear that the NHHDC should use the info in the D0052 preferably, it doesn't rule out the situations where the D0052 isn't used.
3	Power Data Associates	BSCP520	3.3.5.6	Suggest this action needs to be brought forward in the process to 3.3.2.4 as it would immediately follow the request in 3.3.2.3 for confirmation that the UMS meets the requirement of 1.1 and would be the response from the UMSO to the Supplier required by that request.	Noted – With the exception of process step 3.3.2.3 being re-instated as step 3.3.2.1, following other participant IA comments all the activities in Section 3.3 are not in chronological order, therefore there is no need to move step 3.3.2.6 back up to 3.3.2.2.

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4	Western Power Distribution	BSCP520	3.3.2.3	BSCP520 -3.3.2.3 Establish with the UMSO that the UMS meets the requirements of Section 1.1. – The Supplier should have established this before registering the MPAN, usually by means of the customer providing a Certificate of Unmetered Supply, which confirms the UMS meets the requirements of Section 1.1. 3.3.2.3 should be first action and become 3.3.2.1.	Noted – Following discussions with the Proposer, recommend re-instating step 3.3.2.3 as Step 3.3.2.1 and renumbering the subsequent steps accordingly.
5	Western Power Distribution	BSCP520	3.5.7	Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new NHHDC appointment date – The timescale for this (5 wd) is not consistent with change of supplier 3.3.2.7 (10 wd). This will cause confusion and put an unfair timescale on small UMSO teams	Noted - Following discussions with the Proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 to match the 10WD timescale in 3.3.2.7, for better consistency.
6	ScottishPower	BSCP501	1.7 Para 4	ScottishPower are pleased to note that following our initial comments (concerns) regarding the introduction of a timescale, this has been removed, though we note that it is instead inserted into the relevant interface tables within the BSCP.	Noted – no action required.
7	ScottishPower	BSCP501	3.5.5 (Change of	As stated in Point 1 above, the timescale in 1.7 Para 4 has rightly been removed. However it	Noted – Following discussions with the Proposer, they want to keep the proposed 2WD timescales

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			DA) 3.6.6 (New Connection) 3.7.6 (Change of Supplier)	is then restated within the 3 areas listed here. As per the ScottishPower original response, Registration changes are made by Supplier Flows and as such are not passed back separately, or routed via our LDSO, who instead have separate access to ECOES for Registration information. From the opposite perspective, for ScottishPower, LDSO to UMSO registration information would only occur as a result of a new customer where a new MPAN is created, and this is automatically passed into our SMRS and a weekly interface created to record same on our UMSO data. We understand that DNO's will have different arrangements/systems for controlling data flows, and some may well include routing (automatic or otherwise) to UMSO via an LDSO system. As stated above, we link SMRS data direct to UMSO but via a weekly interface which then allows manual updates to be made and records to be matched. While we do not use the steps as defined in the new BSCP 501, ScottishPower still believe that the wording (timescale) demands automatic transfer and update of data should	in BSCP501 as they are.

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				that ever be the case. We believe that the 2 day requirement should be removed completely and amended to a more realistic period such as 10 days.	
8	ScottishPower	BSCP520	1.2.1 (q)	Agreed, and already in place within ScottishPower	Noted – no action required.
9	ScottishPower	BSCP520	3.3.2 (1-4)	The order of the Actions/Steps has changed and this is not agreed. The current order requires that Supplier confirms with the UMSO that the UMS meets requirements of Section 1.1, and that the UMSO sends sight of current UMS Certificate before Registration. This ensures that the Supplier has received the correct EAC Information from the Customer before registration occurs. Thereafter Supplier sends Registration details. The revised proposal still suggests Supplier sends Registration details first then checks supply meets UMSO requirements – we believe this to be inefficient in that there is a strong risk that the Supplier might not liaise fully with Customer regarding the need for a UMS Certificate (complete with relevant EAC) and may also cause a need to undo incorrect	Noted – Following discussions with the Proposer, recommend re-instating step 3.3.2.3 as Step 3.3.2.1 and renumbering the subsequent steps accordingly.

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				registrations and indeed inaccurate EAC information.	
10	ScottishPower	BSCP520	3.3.2.6	As stated in our initial response, this is now occurring late in the process, rather than at the outset of the process. ScottishPower would add that a potential new Supplier would have no right to receive flows until registration takes place (e.g. the D0052 Flow, but they can and we believe should of course verify the supply is correctly UMS and that a current certificate exists.	Noted – with the exception of process step 3.3.2.3 being re-instated as step 3.3.2.1, all the activities in Section 3.3 are not currently in chronological order, therefore there is no need to move step 3.3.2.6 back up to 3.3.2.2. The Proposer wants to keep 3.3.2.6 where it is.
11	ScottishPower	BSCP520	3.3.2.7	ScottishPower note and welcome the consolidation of the actions and the revised timescales (Within 10 Days)	Noted – no action required.
12	ScottishPower	BSCP520	3.5.7	ScottishPower note and welcome the inclusion of both the New Supplier AND the New NHHDC as recipients of the D0052 Flows. However we note the timescale proposed is 5 Days and feel that for consistency this would better be aligned to the revised timescale in 3.3.2.7 (10 Days)	Noted - Following discussions with the Proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 to match the 10WD timescale in 3.3.2.7, for better consistency.
13	ScottishPower	BSCP520	Additional Point ?	ScottishPower reaffirms our view that the Supplier is the Contracting Party and the	Noted – The obligations on the NHHDC are set out in BSCP504, which in this case would

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				NHHDC is their appointed Agent. The Supplier should have the obligation of ensuring their Agent has and correctly processes the D0052. Otherwise it is left to the UMSO to follow up errors. We would therefore prefer to see an additional step to reflect this obligation.	be the requirements for the NHHDC to convert the D0052 into a D0019. Therefore no change is required.
14	ScottishPower	BSCP504		Changes are agreed and relevant UMSO processes are already in place within ScottishPower	Noted – No action required.

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