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Change Proposal Circular – Collated Responses for CPC00721

CPC00721: Impact Assessment of CP1386

Responses for CP1386: Improving Settlement Accuracy for Unmetered Supply on a Change of Supplier or Change of Agent

Summary of Responses for CP1386

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
British Gas	Supplier	Yes	No	00
EDF Energy	Supplier, MOP	Yes	Yes	90
Electricity North West Limited	Distributor	Yes	Yes	182 - 365
GDF SUEZ Marketing Ltd	Supplier	Neutral	No	00
IMServ	HHDC, NHHDC, HHDA, NHHDA, HHMOP, NHHMOP	Yes	Yes	60
Northern Powergrid	LDSO, UMSO	Yes	Yes	30
npower	Supplier and Supplier Agents (NHH and HH)	Yes	Yes	180
Power Data Associates	Meter Administrator	Yes	No	00

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Summary of Responses for CP1386				
Organisation	**Capacity in which Organisation operates in**	**Agree?**	**Impacted?**	**Days needed to implement**
ScottishPower	Distributor, Supplier, Supplier Agents	No	Yes	00
SSE	Supplier & Party Agents	Yes	Yes	30
SSE Power Distribution	LDSO	Yes	No	00
TMA Data Management Ltd	NHHDC, NHHDA, HHDC and HHDA	Yes	Yes	30
Western Power	LDSO	No	Yes	270

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
British Gas	Yes	No	**Agree change comment –** Yes **For which role is your organisation impacted?** – No comment **Please state what the impact is** – No comment **Lead time comment –** No comment **Would implementation in the proposed Release have an adverse impact on your organisation?** – No comment **Associated costs comment** – No comment **Any other comments** – No comments.	Noted – No action required
EDF Energy	Yes	Yes	**Agree change comment –** Yes - We support he change as it would improve the accuracy of the UMS consumption held by NHHDCs. **For which role is your organisation impacted?** – NHHDC **Please state what the impact is** – We would need to make changes to our NHHDC systems to be able to account for this as we would need to be able to account automatically for receiving this data from the UMSO rather than the old NHHDC and close down the processing within NHHDC that expects the D0152 from the old NHHDC. **Lead time comment –** 90 days **Would implementation in the proposed Release have an adverse**	Noted – No action required

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			impact on your organisation? – System change would be required **Associated costs comment** – No costs available **Any other comments** – The main concern that we have is how the effective dates within the D0052 flows will be set and whether this will be consistent across UMSOs, if not then we will need to code our systems to deal with inconsistencies in data population by UMSOs which increases the cost slightly.	
Electricity North West Limited	Yes	Yes	**Agree change comment –** Yes - This will provide more clarity and timescales to the existing process. **For which role is your organisation impacted?** – Distributor **Please state what the impact is** – We will need to develop and implement a process to produce and send D0052's within 5 WD of the CoS. The current process is manual, we cannot send D0052's over the DTN. **Lead time comment –** 182-365 days - If continue with manual solution this can be implemented in 6 months. If it is cost effective to implement an automated solution then we would need 12 months. **Would implementation in the proposed Release have an adverse impact on your organisation?** – No, it would be a manual solution. **Associated costs comment** – No additional costs for manual solution. **Any other comments** – No comments.	Noted – No action required
GDF SUEZ	Neutral	No	**Agree change comment –** Neutral	Noted – No action required

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
Marketing Ltd			**For which role is your organisation impacted?** – N/A **Please state what the impact is** – N/A **Lead time comment –** 0 days **Would implementation in the proposed Release have an adverse impact on your organisation?** – N/A **Associated costs comment** N/A **Any other comments** – No comments.	
IMServ	Yes	Yes	**Agree change comment –** Yes **For which role is your organisation impacted?** – NHHDC **Please state what the impact is** – Remove the need to send information and introduce the need to receive EAC info from UMSO **Lead time comment –** 60 days - Need to ensure that we can receive and process D0052 from UMSO with EAC info **Would implementation in the proposed Release have an adverse impact on your organisation?** – No **Associated costs comment** – 3 man days to review and test **Any other comments** – No comments.	Noted – No action required
Northern Powergrid	Yes	Yes	**Agree change comment –** Yes - Agree that clarity is required to ensure consistency.	Noted – No action required

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Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			For which role is your organisation impacted? – UMSO **Please state what the impact is** – Minor process amendment **Lead time comment –** 30 days **Would implementation in the proposed Release have an adverse impact on your organisation?** – No adverse impact **Associated costs comment** – No associated costs **Any other comments** – No comments.	
npower	Yes	Yes	**Agree change comment –** Yes - We are supportive of the change as it will improve the accuracy of UMS settlement and expedite the current process. **For which role is your organisation impacted?** – Supplier and Supplier Agents **Please state what the impact is** – Positive Impact **Lead time comment –** 180 days **Would implementation in the proposed Release have an adverse impact on your organisation?** – Minor system changes **Associated costs comment** – Minimal costs **Any other comments** – No comments.	Noted – No action required
Power Data Associates	Yes	No	**Agree change comment –** Yes - This is a sensible change to recognise the unique nature of UMS where D0052s are submitted by the UMSO rather than	Noted Impact on BSCP504 was added to

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			the Supplier. It recognises that there are no meters involved in NHH UMS, which it is understood has caused the failure of the currently documented process using a D0152 flow from old NHHDC to new NHHDC, consequent upon which some UMSOs are employing a workaround. Although there is no direct impact upon our role or processes, we welcome any change that will improve settlements accuracy. **For which role is your organisation impacted?** – No comment **Please state what the impact is** – No impact **Lead time comment –** No comment **Would implementation in the proposed Release have an adverse impact on your organisation?** – None **Associated costs comment** – None **Any other comments** – As well as the proposed red lining of BSCP501 & BSCP520, BSCP504 should also be amended to make it clear that only the UMSO shall provide a D0052 for UMS. In para. 3.4.1.1 under the heading "unmetered supply" there is an action "Send UMS EAC" against which the UMSO/Supplier sends a D0052 and a D205 to SMRA. This is clearly an error. A housekeeping change is required to make it clear the UMSO sends the D0052 to the NHHDC and the Supplier sends the D0205 to SMRA as part of the registration process. The D0205 should be complete and include any change of appointed NHHDC. It is possible for a "skeleton" registration to be made that does not include	CP1386v2.0

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Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			agent details, in which case the UMSO would not have the new NHHDC details.	
ScottishPower	No	Yes	**Agree change comment –** No - SPEN 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. **For which role is your organisation impacted? –** LDSO and UMSO **Please state what the impact is –** Requirement to change internal procedures to ensure new requirements can be met **Lead time comment –** 0 days - ScottishPower Energy Networks already carry out the activity of passing UMS EAC information to both the Supplier and the appropriate appointed NHH DC. **Would implementation in the proposed Release have an adverse impact on your organisation? –** No comment **Associated costs comment –** No comment **Any other comments –** No comments.	Noted – comments and action taken on redlined text comments set out next table.
SSE	Yes	Yes	**Agree change comment –** Yes **For which role is your organisation impacted? –** Supplier & Party Agent **Please state what the impact is –** Minor amendment to process	Noted – No action required

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			Lead time comment – 30 days **Would implementation in the proposed Release have an adverse impact on your organisation? –** No **Associated costs comment –** Negligible **Any other comments –** No comments.	
SSE Power Distribution	Yes	No	**Agree change comment –** Yes **For which role is your organisation impacted? –** N/A **Please state what the impact is –** N/A **Lead time comment –** 0 days **Would implementation in the proposed Release have an adverse impact on your organisation? –** N/A **Associated costs comment –** N/A **Any other comments –** No comments.	Noted – No action required
TMA Data Management Ltd	Yes	Yes	**Agree change comment –** 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. **For which role is your organisation impacted?** – NHHDC **Please state what the impact is** – LWP impact	Noted – No action required

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Detailed Impact Assessment Responses CP1386				
Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			Lead time comment – 30 days **Would implementation in the proposed Release have an adverse impact on your organisation?** – No **Associated costs comment** – Low cost **Any other comments** – No comments.	
Western Power	No	Yes	**Agree change comment –** No - We do not think this is the correct solution to the problem. This alternate process was raised as a work around because Suppliers and NHHDCs are not complying with existing BSCP requirements. On change of supplier and/or NHHDC the old NHHDC should submit metering system and NHH EAC details to new NHHDC, but this rarely happens and results in estimates, or wrong EACs being traded. To overcome the problem the CP proposer wants to shift responsibility to the UMSO. In general we are not comfortable with this CP and feel that it puts additional responsibility and a resource strain on small UMSO sections. We feel that instead of this CP the effort should be concentrated on ensuring Suppliers and NHHDCs comply with existing BSC requirements **For which role is your organisation impacted?** – UMSO **Please state what the impact is** – Business process and system changes **Lead time comment –** 270 days - This will need additional interfaces between LDSO and UMSO systems and we cannot introduce these ahead of the November 2013 release	Noted CP1386 is changing the process and responsibility around how the UMS EAC is obtained, away from the NHHDC and on to the UMSO. However the activity is not new, as the CP will formalise an existing workaround that is in place. Action taken on redlined text comments set out below.

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Organisation	**Agree?**	**Impacted?**	**Comments**	**ELEXON action taken following discussions with Proposer**
			Would implementation in the proposed Release have an adverse impact on your organisation? – Yes. Due to other changes being developed there is insufficient time to implement this CP by June 2013 **Associated costs comment** – £5,000 **Any other comments** – Suppliers should ensure that the old NHHDC fulfils its obligations under the BSC. The solution should not involve making other parties, the LDSO and UMSO, pick up the cost of dealing with poor agent performance.	

Comments on the redline text CP1386						
No.	**Organisation**	**Document name**	**Location**	**Severity Code**	**Comments**	**ELEXON action taken following discussions with Proposer**
1.	ScottishPower	BSCP501	1.7 Para 4	H	There is a significant change from what was an assumption to a requirement and in addition this has been defined as required within 2 Working Days. SPEN do not agree with this requirement and with the timescale proposed. Registration changes are made by Supplier Flows	Noted. The proposer believed there is a need to add this requirement and timescales so that the LDSO advises the UMSO if they become aware of a change to the UMS site. However following discussions with the

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					and as such are not passed back separately to our LDSO, who instead have access to ECOES for Registration information. From the opposite perspective, 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.	proposer the BSCP501 redlined text for CP1386v2.0 was amended to add the new timescale and step into the appropriate BSCP501 interface tables rather than having the timescales in the 'Use of the Procedure' section. The 'Use of Procedure' section was updated to refer to the interface tables.
2.	Electricity North West Limited	BSCP520	3.3.2 Non-Half Hourly Trading	L	For Ref: 3.3.2.8 should the 'WHEN' be 'Within 5 WD of 3.3.2.6'	Noted - Step 3.3.2.8 should have referred to the previous step 3.3.2.7. Therefore wording should read Within 5 WD of 3.3.2.7. However this was addressed in CP1386v2.0 when the two new steps were merged into one.
3.	Power Data Associates	BSCP520	3.3.2.3	L	This seems unnecessary and could be deleted. The supply is already in existence, this would only be relevant for a new supply (with associated MSIDs), not for a change of supplier. Alternatively it could be changed to an action by the Supplier requesting a copy of the current UMS certificate". This would lead in to 3.3.2.6 in the	Noted - No Action taken as this is an existing step that is not being introduced or amended (merely Moved) by CP1386.

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					timetable, which would be brought forward and renumbered.	
4.	Power Data Associates	BSCP520	3.3.2.4	M	There is no need to send details of old NHHDC to new parties, as the UMSO will now provide the EAC rather than the old NHHDC. Suggest action is changed to "Send appointment details to relevant recipients".	Noted - No Action taken as this is another existing step that is not being introduced or amended by CP1386.
5.	Power Data Associates	BSCP520	3.3.2.4	L	"Appointment and Terms" is duplicated in Information Required after D0155 flow.	Noted - Agreed and addressed and included in CP1386v2.0
6.	Power Data Associates	BSCP520	3.3.2.7 and 3.3.2.8	H	This could be simplified into one action. The change to BSCP501 will mean that the LDSO must advise the UMSO within 2 working days. Suggest that When should be: "Within 5 WD of SSD following notification of a Change of Supplier and NHHDC from the LDSO. Where notification of Change of Supplier and NHHDC from LDSO is for a retrospective SSD, within 5WD of receipt of notification" It is possible that an inventory (and associated EACs) could be updated with an EFD later than the SSD, but	Noted - Following discussions with the proposer, this comment was taken on board with the two steps merged. And included in CP1386v2.0 The timescale overall was extended overall to 10 WDs to address later comments on providing sufficient time to complete the activity.

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					before notification to the UMSO of the change of supplier and NHHDC (retrospective registration). The NHHDC and Supplier will want all EACs since the SSD. Suggest action is: "Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new SSD. Any EACs with an EFD subsequent to the new SSD previously issued to the old NHHDC and Supplier shall also be provided in a subsequent D0052 flow." 3.3.2.8 can be deleted and the remaining four columns moved up to 3.3.2.7. In the To column the New Supplier will also receive the D0052 flow from the UMSO as well as the New NHHDC.	
7.	Power Data Associates	BSCP520	3.5.7		This seems too simple and needs expanding. I think there is an issue with NHHDCs holding EACs prior to their appointment date. Suggest that When should be: "Within 5 WD of SSD following notification of a Change of NHHDC from the LDSO. Where notification of Change of NHHDC from LDSO is for a	Noted - The proposed redlining for this step was amended for CP1386v2.0 to provide additional clarity.

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					retrospective appointment date, within 5WD of receipt of notification" Suggest action is: "Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new NHHDC appointment date. Any EACs with an EFD subsequent to the new NHHDC appointment date previously issued to the old NHHDC shall also be provided in a subsequent D0052 flow." In the To column the New Supplier will also receive the D0052 flow from the UMSO as well as the New NHHDC.	
8.	ScottishPower	BSCP520	1.2.1 (q)	L	Agreed, and already in place within SPEN	Noted - No action required.
9.	ScottishPower	BSCP520	3.3.2 (1-4)	H	The order of the Actions have 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	The actions are not in chronological order. If they were there would be a clear 'Following X.X.X.X' or 'Within X WDs of X.X.X.X' in the relevant tables As long as each activity listed is completed by the initial timescale indicated in the initial step The order was rearranged, to group the Supplier and UMSO activities together to make it easier to read. No action taken in preparing CP1386v2.0

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					details. The proposal suggests Supplier sends Registration details first then checks supply meets requirements – we believe this to be inefficient in that there may be cause to undo incorrect registrations and indeed inaccurate EAC information.	
10.	ScottishPower	BSCP520	3.3.2.6	H	This is now occurring late in the process, rather than at the outset of the process.	Noted - The actions are not in chronological order. If they were there would be a clear 'Following X.X.X.X' or 'Within X WDs of X.X.X.X' in the relevant tables As long as each activity listed is completed by the initial timescale indicated in the initial step The order was rearranged, to group the Supplier and UMSO activities together to make it easier to read. No action taken in preparing CP1386v2.0
11.	ScottishPower	BSCP520	3.3.2.7	H	This is an entirely new step and therefore not just a housekeeping or a confirmation of an existing requirement or working practice. It introduces obligation to align EFD within 2 working days of the any new SSD-1. SPEN do align the data but within more realistic timescales using a	Noted. This comment was addressed in CP1386v2.0 by merging the two proposed new steps into a single step and increase the timescale to complete the activity to 10WDs.

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					weekly SMRS/UMSO Reconciliation. We require the timescale to be extended to a minimum of 5, but preferably 10 WD It also introduces potential receipt of CoS information from LDSO which does not occur in SPEN Systems (the LDSO would not be aware of any changes here). Again we do not agree with the redlined text.	
12.	ScottishPower	BSCP520	3.3.2.8	M	Presume typo in that text states within 5WD of same REF Line 3.3.2.8 – should read 3.3.2.7 ?	Noted - Step 3.3.2.8 should have referred to the previous step 3.3.2.7. Therefore wording should read Within 5 WD of 3.3.2.7. However this was addressed in CP1386v2.0 when the two new steps were merged into one.
13.	ScottishPower	BSCP520	3.3.2.8	H	SPEN issue the D0052 to the New Supplier AND the New NHHDC. We believe this should be incorporated as the Supplier is the Contracting Party and the 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.	Noted - Even though the New Supplier would have received the P207, an equivalent of the D0052 under step 3.3.2.6, the proposer agree that the New Supplier should be a recipient of the D0052 as well to provide a useful cross check if need be. This was included in the revised redlined changes for CP1386v2.0

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14.	ScottishPower	BSCP520	3.5.7	H	SPEN issue the D0052 to the New Supplier AND the New NHHDC. We believe this should be incorporated as the Supplier is the Contracting Party and the 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.	Noted - This was included in the revised redlined changes for CP1386v2.0
15.	Western Power	BSCP520	3.3.2		3.3.2.6 - Should follow 3.3.2.7 – the UMSO cannot send certificate(P0207) until they know about COS.	Noted - As mention above this process steps are not in chronological order. The certificate info would feed into step 3.3.2.7. They could be sent concurrently if need be. No action taken.
16.	Western Power	BSCP520	3.3.2		3.3.2.8 - Timescale should read 'Within 5 WD of 3.3.2.7'	Noted - Step 3.3.2.8 should have referred to the previous step 3.3.2.7. Therefore wording should read Within 5 WD of 3.3.2.7. However this was addressed in CP1386v2.0 when the two new steps were merged into one.

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