



Change Proposal Circular – Collated Responses for CPC00722

CPC00722: Impact Assessment of CP1387

Responses for CP1387: Clarifications to the guidance and requirements for PARMS data submissions and reporting contained in BSCP533 and Appendices

Summary of Responses for CP1387

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
British Gas	Supplier, MOA	Yes	Yes	00
EDF Energy	Supplier, NHHDC	Yes	No	30
Electricity North West Limited	LDSO	Neutral	-	00
IMServ Europe	HHDC/DA/MOA, NHHDC/DA/MOA	Yes	Yes	90
Lowri Beck Services Ltd	NHHMO, NHHDC, NHHDA	Yes	-	00
Northern Powergrid	LDSO	Yes	No	00
Npower	Supplier, NHHDC, NHHDA, HHDC, HHDA and MOA	No	Yes	365
ScottishPower	Supplier, Supplier Agent, NHHDC	Yes	No	00

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**Any Questions**

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Summary of Responses for CP1387				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Siemens	NHHMOA, NHHDC, NHHDA, HHMOA, HHDC, HHDA	Yes	Yes	30
SSE Energy Supply	Supplier	Yes	Yes	120
SSEPD	LDSO	Neutral	No	00
Stark	HHDC/DA and NHHDC/DA	Yes	Yes	100
TMA	HHDC, HHDC, NHHDC and NHHDA	Yes	Yes	90

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Detailed Impact Assessment Responses CP1387			
Organisation	Agree?	Impacted?	Comments
British Gas	Yes	Yes	<p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: Supplier</p> <p>Clearer outline of PARMS reporting requirements.</p> <p><u>For the HM12 and NM12 Serials, do you believe that you would be able to correctly identify Change of Measurement Class events through a similar method to identifying New Connections?</u></p> <p>The method to identify CoMC would not be as straight forward as identifying a new Connection as there is no specific flag on the D0055 indicating there has been an MC change but it could be done. We would have to interrogate the D0055 / D0205 and / Or D0217 to allows us to determine if a CoMC event had occurred.</p>
EDF Energy	Yes	No	<p><u>Comments relating to implementation costs</u></p> <p>No costs associated with this change</p>
Electricity North West Limited	Neutral	-	-
IMServ Europe	Yes	Yes	<p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: HHDC and MOA, NHHDC and MOA.</p> <p>Update to select serials. Change to be managed via formal project entailing analysis, code review, code change, testing and deployment.</p> <p><u>Comments relating to implementation date</u></p>

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Organisation	Agree?	Impacted?	Comments
			<p>In addition to the actual time required by the project, lead time is required for the planning and release of appropriate resource to work on the project.</p> <p><u>For the HM12 and NM12 Serials, do you believe that you would be able to correctly identify Change of Measurement Class events through a similar method to identifying New Connections?</u></p> <p>Until analysis and development commences, it is not possible to comment on this.</p>
Lowri Beck Services Ltd	Yes	-	-
Northern Powergrid	Yes	No	<p><u>Comments relating to impact of the solution</u></p> <p>No impact</p>
npower	No	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>It appears from assessing this CP the proposed 'clarifications' make significant changes to a range of the serials. In addition, these changes do not consider the potential further significant changes which will need to be made due to the introduction of Smart metering – specifically the changes to Meter Technical Details that are proposed in CP1388.</p> <p>With the changes proposed in CP1388 which would require further changes to the PARMS Serials we would recommend ELEXON delay any changes to encompass all the changes in one single update.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: Supplier, NHHDC, HHDC and MOA.</p> <p>After assessing the proposed new guidelines against the baseline, nearly every one of the PARMS Serials would require system changes to implement them.</p>

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Organisation	Agree?	Impacted?	Comments
			<p><u>Comments relating to implementation date</u></p> <p>We would require a minimum of 12-months notice to allow us to develop, test and implement these changes.</p> <p><u>Comments relating to implementation costs</u></p> <p>Although we are unable to provide detailed costs at present, we believe the changes would be significant. We would anticipate the costs being approximately £250k – please note this is an estimate based on previous PARMs changes.</p> <p><u>For the HM12 and NM12 Serials, do you believe that you would be able to correctly identify Change of Measurement Class events through a similar method to identifying New Connections?</u></p> <p>Unable to comment at this time, we would require our IT department to review current processes and system functionality and we are unable to get that review within the consultation timescale.</p>
ScottishPower	Yes	No	<p><u>For the HM12 and NM12 Serials, do you believe that you would be able to correctly identify Change of Measurement Class events through a similar method to identifying New Connections?</u></p> <p>This will depend on the prompt use of the appropriate D0150 or D268 flow (or the data on new Smart Metering configuration flow), after a change of metering from HH to NHH or vice versa.</p>
Siemens	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>The redlined text clarifies that for both HM12 and NM12, Standard 1 should include New Connections. However, this standard is counted at Old MOA/ GSP/ Supplier level. Please could confirmation be provided on whether new connections, where there is no Old MO, should be counted against 'UUUU' as the Old MOA?</p>

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Organisation	Agree?	Impacted?	Comments
			<u>Comments relating to impact of the solution</u> Impacted as: HHDC, HHMOA, NHHDC, NHHMOA Existing PARMS reports will be reviewed to ensure that they still adhere to these updated guidelines. No Adverse impact
SSE Energy Supply	Yes	Yes	<u>Comments relating to impact of the solution</u> Impacted as: Supplier, HHMOA. This should reduce the amount of D0268's showing as missing. No adverse impact. <u>Comments relating to implementation costs</u> Effort of approx. 20 working days to implement the necessary changes. <u>For the HM12 and NM12 Serials, do you believe that you would be able to correctly identify Change of Measurement Class events through a similar method to identifying New Connections?</u> Unsure, we would need to check if the previous MOP is sent on the D0148 on all COMC. It appears to be proving increasingly difficult to omit COMC and New Connections. For example, reviewing our last HM12 for SOUT supply, for 20 MPANS appearing in the prior to R1 period, 18 are either NC or COMC.
SSEPD	Neutral	No	<u>Comments relating to agreement of the solution</u> No Interest
Stark	Yes	Yes	<u>Comments relating to impact of the solution</u> Modifications to some reports

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TMA	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>Avoiding miss-interpretation in PARMS reports is necessary to have some benefit from these involved and complicated reports.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: HHDC, NHHDC</p> <p>Potential impact on systems.</p> <p><u>Comments relating to implementation costs</u></p> <p>Low to medium cost.</p>

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Comments on the redline text CP1387					
No.	Organisation	Document name	Location	Severity Code	Comments
	IMServ Europe	BSCP533, Appendix B	2.1.1	L	GSP Group Level Submissions: The updated wording includes instruction regarding the use of the "U" GSP Group. Should this also include clarification on the use of "U" for Unknown Agents/Suppliers or, is the intention to leave the decision with Agents to use their discretion in how this is applied?
	npower	BSCP533, Appendix B	3.3.6	M	The redlined text clarifies that for HM12, Standard 1 should include New Connections. However, this standard is counted at Old MOA/ GSP/ Supplier level. Please could confirmation be provided on whether new connections, where there is no Old MO, should be counted against 'UUUU' as the Old MOA?
	npower	BSCP533, Appendix B	3.3.10	M	The redlined text clarifies that for NM12, Standard 1 should include New Connections. However, this standard is counted at Old MOA/ GSP/ Supplier level. Please could confirmation be provided on whether new connections, where there is no Old MO, should be counted against 'UUUU' as the Old MOA?
	Siemens	BSCP533, Appendix B	3.3.6	M	The redlined text clarifies that for HM12, Standard 1 should include New Connections. However, this standard is counted at Old MOA/ GSP/ Supplier level. Please could confirmation be provided on whether new connections, where there is no Old MO, should be counted against 'UUUU' as the Old MOA?
	Siemens	BSCP533,	3.3.10	M	The redlined text clarifies that for NM12, Standard 1 should include New Connections.

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		Appendix B			However, this standard is counted at Old MOA/ GSP/ Supplier level. Please could confirmation be provided on whether new connections, where there is no Old MO, should be counted against 'UUUU' as the Old MOA?
	SSE Energy Supply	BSCP533, Appendix B	General	L	Agree with updates and note the changes to Agent identifiers as abbreviations (SP11/SP14/SP15).
	SSE Energy Supply	BSCP533, Appendix B	3.4.4 HM12 Purpose of the Serial	L	Agree with updates and note the changes to only include Agent abbreviations, as well as explanatory note about New Connections. We note that the comment stating ' change of meter events should not be reported by this serial' is still in, we understood this would be removed from previous discussions with Elexon. Explanatory text as below: 'For clarification, HM12 is only concerned with the transfer of MTDs on a Change of Agent event.'
	Stark	BSCP533, Appendix B	2.1.1	-	says that GSP_U should not occur in reports SP11 or HM14, but the relevant report sections say they should be included. We have occasionally used GSP_U in report HM14, but not SP11.
	Stark	BSCP533, Appendix B	3.3.7	-	HM13 (MTD Quality ie. resubmissions) - There should be no submissions with agent UUUU. This is true for the MOP, but the Supplier could still be unknown. Supplier of UUUU has been reported occasionally.
	Stark	BSCP533, Appendix B	3.3.8	-	HM14 (Timely Investigation ie. D0002) Exclusions 'There should be no instances of agent UUUU as this is the sender of the D0002.' This is true for the MOP, but the Supplier could still be unknown. Supplier of UUUU has been reported occasionally.
	Stark	BSCP533,	3.3.9	-	NM11 (Timely MTD) Exclusions 'There should be no instances of agent UUUU as this is the

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		Appendix B			sender of the D0150'. This is true for the MOP, but the Supplier could still be unknown. Supplier of UUUU has been reported occasionally.
	TMA	BSCP533, Appendix B	Page 15 , penultimate paragraph	L	Typo: "If no Metering Systems qualify for reporting in SP04 within a particular GSP Group, the Supplier must indicate this by submitted zero values" should be If no Metering Systems qualify for reporting in SP04 within a particular GSP Group, the Supplier must indicate this by submitting zero values.

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