

# Assessment Procedure Consultation Responses

## P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)'

**ELEXON**

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

This Assessment Procedure Consultation was issued on 23 June 2014, with responses invited by 11 July 2014.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Power Data Associates Ltd	0/1	Meter Administrator
GDF SUEZ Marketing Limited	1/0	Supplier
IMServ Europe Ltd	0/6	Half Hourly (HH) Data Aggregator (DA), Non Half Hourly (NHH) DA, HH Data Collector (DC), NHHDC, HH Meter Operator Agent (MOA) and NHHMOA
UK Power Networks	3/0	Licensed Distribution System Operator (LDSO)
Scottish and Southern Energy Power Distribution	2/0	LDSO
Electricity North West	1/0	LDSO
SmartestEnergy	1/0	Supplier
Western Power Distribution	4/0	LDSO
British Gas	1/0	Supplier
ScottishPower	3/1	Supplier, LDSO, HHDA and HHDC
RWE Npower	9/0	Supplier, Generator, Trader, Consolidator, Exemptible Generator and Party Agent
GTC	2/0	LDSO
Northern Powergrid	2/0	LDSO
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA

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Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON	5/7	Supplier, HHDA, NHHDA, HHDC, NHHDC, HHMOA and NHHMOA
SSE Energy Supply Ltd	1/1	Supplier, Party Agent
EDF	10/0	Supplier, Party Agent, Consolidator, Generator, Exemptable Generator and Trader

Question 1: Do you agree with the Workgroup's initial unanimous view that P300 does better facilitate the Applicable BSC Objectives than the current baseline?

## Summary

Yes	No	Neutral/No Comment	Other
15	2	-	-

## Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Provides the ability for greater number of customers to settle on a HH basis, removing the uncertainty and error of profiling
GDF SUEZ Marketing Limited	Yes	<p>P300 facilitates the following BSC objectives:</p> <ul style="list-style-type: none"> <li>Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity</li> <li>Promoting efficiency in the implementation and administration of the balancing and settlement arrangements</li> </ul> <p>It does so by increasing the level of HH settlement across the industry without unduly penalising the majority of NHH customers who will move to HH settlement (if P272 is implemented) with onerous distribution charges.</p> <p>However, it should be noted that if/when P272 (Mandatory HH Settlement for PC5-8) comes in, our interpretation is that any non-domestic NHH customer in PC5-8 which has a CT meter will have to move to HH Measurement Class "E", and will therefore attract site-specific DUoS charges. This would mean that NHH customers in this category would see an increase in both the level and complexity of their DUoS charges which would not be the case for a WC non-domestic NHH customer, who could move to HH Measurement Class "G" and be charged DUoS on an aggregate basis.</p> <p>We would also welcome some clarification as to why the aggregated tariffs can be made available to domestic non-100kW customers with CT meters (via Measurement Class "F"), but not to non-domestic non-100kW customers with CT meters.</p>

Respondent	Response	Rationale
		The creation of these differential DUoS charging outcomes for non-domestic non-100kW customers moving from NHH to HH based on the configuration of their meters and whether or not they are classified as “domestic” would appear to limit the effectiveness of P300 in promoting the BSC objectives, although from a settlement perspective there would be an improvement from the current baseline due to the general increase in the number of meters being settled HH.
IMServ Europe Ltd	Yes	<p>C) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity</p> <p>P300 would have limited impact on this BSC Objective. In itself P300 would not promote competition but in combination with DCP179 it would allow more accuracy of settlement in allowing for aggregated Duos billing.</p> <p>D) Promoting efficiency in the implementation of the balancing and settlement arrangements</p> <p>P300 would have an impact on this BSC Objective. It would lead to more accurate settlement due to the use of HH metering and the inherent increased accuracy of data. The use of aggregated data rather than site specific basis should provide efficiencies and prove cost effective.</p>
UK Power Networks	Yes	<p>We believe that objective (d) is better facilitated because it provides an efficient and cost effective method to deal with a large increase in the volume of HH data, without significantly increasing the volume of Site Specific data that all parties will receive resulting from the expansion of the HH market.</p> <p>In addition there is current doubt as to the blanket availability of individual customer Domestic HH data for DNOs. By aggregating the data centrally within settlement, this potential issue is overcome.</p>
Scottish and Southern Energy Power Distribution	Yes	We believe it better facilitates BSC objectives C & D.
Electricity North West	Yes	<p>Objective (d) as per the proposer and working group’s view</p> <p>Objective (c) only received minimal support based on the reasoning provided by the proposer.</p>

Respondent	Response	Rationale
		<p>However as part of P280 this objective was supported by the working group. We have reviewed the working group conclusions on this and copied them here for further consideration.</p> <p>"The Group members who believe P280 will better facilitate Objective (c) do so because it will:</p> <ul style="list-style-type: none"> <li>• Facilitate more effective management of increased volumes of HH data;</li> <li>• Ensure systems and processes are in place to enable Suppliers to move into the new HH market when they wish to do so without constraint;</li> <li>• Allow flexibility to suppliers to receive aggregated or site specific bills.</li> </ul> <p>Some group members also noted that the P280 solution utilises existing processes which minimises impacts and costs."</p> <p>We believe the first two bullet points are still valid but the last one not so much since this was more related to whether PC5-8 customers could be settled on a site specific basis or on an aggregated basis.</p>
SmartestEnergy	No	<p>We are of the view that the purpose of this modification is to accommodate the inflexibility of DNO systems because of the way they associate site specific bills with HH MCs. The efficiency of the BSC is not improved by this modification.</p> <p>We are also concerned at the fact that the latest proposal suggests that distributors will base their bills on D10, whereas the supplier is only receiving D36s. Suppliers should be billed by distributors on the same data the suppliers are billing their customers on otherwise there is the danger of discrepancies.</p>
Western Power Distribution	Yes	(d) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity.
British Gas	Yes	-
ScottishPower	Yes	We agree with the Work Groups opinion that P300 will have no impact with regards to Applicable Objective (c) and as such are neutral. We also agree that P300 better meets Applicable BSC Objective (d) in that the increased use of actual

Respondent	Response	Rationale
		data from HH metering will improve settlement accuracy.
RWE Npower	Yes	Npower believes this modification does better facilitate the Applicable BSC Objective D. Objective D provides an efficient and cost effective mechanism to deal with a large increase in the volume of HH data and help with the accuracy of settlement. A change needs to take place in both codes in order for P300 to be a success. However Npower would like to add that there is no relevance to P300 without DCP179 therefore as a standalone modification it does not really facilitate any of the relevant objectives, unless both changes are looked at together.
GTC	Yes	We agree that BSC objective d is better facilitated by this change however we have some concerns on the impact to LLFC's and that if these are not addressed the CP may not offer an improvement under the BSC objectives.
Northern Powergrid	Yes	<p>We agree with the Proposer's assessment against objective c – in conjunction with DCP 179 this change will aid the smart meter roll out, and in so doing will promote competition; however we are aware that the merits of this change alone must be viewed in this assessment.</p> <p>We agree that this change will better facilitate objective d, and over time as customers migrate to the new measurement classes, we would expect to see a good step forward against this objective.</p>
TMA Data Management Ltd	Yes	P300 facilitates DCP179 which in turn enables P272 to be implemented more efficiently, by removing the barrier of site specific DUoS. Increasing the proportion of HH data used in Settlement will improve the accuracy of Settlement and reduce the inefficiencies found in the NHH market.
E.ON	Yes	We agree that P300 better facilitates Applicable BSC Objective D.
SSE Energy Supply Ltd	Yes	<p>P300 most relevantly facilitates Objective (c) because it provides an improved accuracy in settlement arrangements, and the associated allocation of costs.</p> <p>We are cognisant of the view that Objective (d) is also facilitated through P300 but suggest the impact is minimal. P300 in itself does not promote efficiency in the BSC, rather it adds costs to the</p>

Respondent	Response	Rationale
		administration and implementation of the BSC arrangements. It is necessary to note the wider benefits of implementing P300 (please see question 7), however these are not technically relevant to the BSC Objectives.
EDF	No	<p>In the absence of reliable information on costs for individual parties, the likely timescales for significant take-up of HH settlement, and the benefits of P300 for parties or consumers, we remain uncertain whether BSC objectives would be better met.</p> <p>For BSC Objective (c) concerning competition, expenditure to support P300 by those who do not require or expect to use the functionality, in order to manage the impacts created by those that do, does not obviously support competition.</p> <p>We do not require P300 to support HH settlement for PC5-8 and a proportion of PC3-4. But other participants do, as a consequence of which we would have to develop processes to accommodate it if it is approved. We would not expect to use new measurement classes ourselves for domestic or smaller PC3-4 sites in the near term before smart rollout is well underway, but would have to develop workaround processes for sites acquired on the new measurement classes.</p> <p>For the relatively small take-up of half-hourly settlement expected over the next 3-4 years (including potentially profile class 5-8 under P272), we have concerns that the solution and its costs might be premature and divert resources from long term solutions for HH settlement using new DCC/Smart processes. Simply adapting/expanding the existing site-specific processes for those that require it, instead of requiring everyone to support it, could be a more efficient and competitive approach. Site-specific tariffs can in principle support any desired DUoS tariff structure.</p> <p>For BSC Objective (d) concerning BSC process efficiency, there is considerable participant implementation cost with likelihood of net costs in ongoing BSC or internal efficiency. The main saving appears to be for Distribution System Operators (DSO) within DUoS processes, which does not in itself improve BSC efficiency.</p> <p>The direct costs for P300 are real and significant. The consequential costs if it significantly increases HH take-up are real and potentially even more</p>

Respondent	Response	Rationale
		<p>significant. The direct benefits of P300 in relation to energy costs appear to be relatively small and uncertain. While HH take-up remains relatively small, even the process benefits are probably very small. Some participants have indicated that the cost of supporting existing site-specific DUoS charging if the meters currently in Profile Class 5-8 were settled half-hourly is significant. However, this is not the case for EDF Energy, or for all DSOs. If an additional relatively small number of meters in profile class 3-4 were also settled HH, the additional cost of existing DUoS processes might also remain modest.</p> <p>If HH take-up over the next 3-4 years, before Smart/DCC HH data processing methods are developed, is significant, then P300 would be likely to deliver a net benefit.</p> <p>P300 can be viewed as an expensive insurance for the possibility of a significant take-up of HH settlement over the next 3-4 years, before DCC/Smart HH processing methods are developed, in which DNOs and some suppliers expecting to undertake that take-up would incur costs to support the DUoS processing impacts.</p> <p>Although we have expectation of comprehensive half-hourly settlement capability towards the end of smart metering rollout, we expect most existing NHH customers (by number) and processes to remain NHH for the next few years. Until there is a clear indication that significant take-up of half-hourly metering is likely, expensive work to support it is hard to justify.</p>



## Question 2: Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P300?

### Summary

Yes	No	Neutral/No Comment	Other
12	1	1	3

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Other	Not reviewed
GDF SUEZ Marketing Limited	Yes	We have reviewed the text and it is consistent with the changes envisaged by P300.
IMServ Europe Ltd	Yes	The draft legal text incorporates the renamed Measurement Class E as well as the new Measurement Classes F & G. It also includes the Line Loss Factor Class considerations and also provides a suitable table of charges for failure to comply with Serial SP08c.  It appears that all relevant sections of the BSC have been considered.
UK Power Networks	Yes	Having reviewed the proposed changes to the BSC legal text we are comfortable that these reflect the changes proposed as a result of P300.
Scottish and Southern Energy Power Distribution	Yes	-
Electricity North West	Yes	We are comfortable with the legal text changes and align with the earlier comments we made during the working group review prior to this consultation.
SmartestEnergy	No comment	No comment.
Western Power Distribution	Yes	However Pg. 7 Trading disputes – para f – why is M/C E considered NHH? should this M/C be defined in para e and classed as HH.
British Gas	Yes	-
ScottishPower	Yes	-
RWE Npower	No	Npower have some concerns that the redlining of documents in the consultation appears to be restricted to the BSC and no redline BSCPs or CoPs have been made available for review. Npower don't feel that a full assessment can be made until there

Respondent	Response	Rationale
		is visibility.
GTC	Other	Not Reviewed.
Northern Powergrid	Yes	-
TMA Data Management Ltd	Yes	Much of the detail of this Modification will be within the BSC subsidiary documents.
E.ON	Yes	We believe that the draft legal text delivers the intention of P300.
SSE Energy Supply Ltd	Yes	No further comment.
EDF	Other	<p>We have not subjected the draft text to full legal scrutiny, but in general it appears to capture the intention of the proposal, subject to the following minor comments:</p> <ol style="list-style-type: none"> <li>1. Annex S-2 5.1.3: This is where the requirement for distribution system operators to provide "dummy" standard settlement configuration (SSC) data for HH meters to the Supplier Volume Aggregation Agent (SVAA) to support aggregate reporting itemised by LLFC/SSC/Time Pattern Regime by NHHDA and SVAA is captured, but by reference to BSC Procedures rather than explicit description. An explicit requirement for this information also to be reported to Suppliers (and Agents) would provide further assurance of visibility.</li> <li>2. Use of existing Consumption Component Classes for the new Measurement Classes, rather than new ones, means that the losses associated with Measurement Classes E,F,G would not be itemised in reporting, and a single GSP Group Scaling Weight would apply to total metered values and losses.</li> <li>3. Item 1 and the footnote on Page 3 of the assessment consultation document suggest that DCP179 seeks to mandate use of new Measurement Classes F and G rather than allow their use to be voluntary on the part of suppliers, with choice of C or E instead. The legal text contains no provision for mandatory use. Conversely, if firm use of the new classes was mandatory at the point of implementation, there would be impacts for existing HH meters expected to be in a different measurement class from the start date.</li> </ol>

Question 3: What are the implementation costs for your organisation to implement P300 as a standalone change (not including DCP179, P272 or any other change)?

## Responses

Respondent	Response
Power Data Associates Ltd	Not directly impacted.
GDF SUEZ Marketing Limited	Considering P300 as a standalone change, (ie without DCP 179) we do not envisage any significant costs. (System updates for new Measurement Classes, process change to identify CT meters etc.).
IMServ Europe Ltd	<p>Approx 100 Man Days (Implementation only)</p> <p><b>One off costs:</b> An approximate man-day effort has been quoted as, until more detailed information is available regarding nature of changes to flows etc, and also answers provided to outstanding questions, it is not possible to be more specific.</p> <ul style="list-style-type: none"> <li>• Development, testing and deployment of DC/DA/MO System Changes to allow sending and receiving of amended flows and Measurement Classes</li> <li>• Modifications to PARMs reports</li> <li>• Modification to internal Management Reporting</li> </ul> <p><b>On-Going Costs:</b> N.B: Costs for such are not available until volume is determined.</p> <ul style="list-style-type: none"> <li>• Additional Training, production of associated Procedures/LWIs, reporting, support, data storage resources, general resources etc</li> <li>• Additional Auditing/Performance Assurance support</li> <li>• Possible requirement for additional personnel</li> <li>• Additional DTN costs</li> </ul> <p><b>Other Cost considerations:</b> N.B: Costs for such are not available until volume is determined.</p> <ul style="list-style-type: none"> <li>• May require additional hardware to support data capture</li> <li>• External Support costs (e.g. licences, communications costs, Disaster Recovery site etc)</li> </ul> <p><b>BSC Systems Release:</b></p> <ul style="list-style-type: none"> <li>• There would be no difference in terms of cost whether P300 is implemented as part of or outside of a normal BSC Systems Release providing the Lead Time was adequate which it appears to be (see Questions 4 &amp; 5).</li> </ul>
UK Power	At the current time, we believe that all changes resulting from P300

Respondent	Response
Networks	can be dealt with as part of our business as usual processes, and so no additional costs are likely to be incurred over and above those already identified for P272 and DCP179. This assumes any system changes arising from P300 can be rolled into system releases arising for other reasons.
Scottish and Southern Energy Power Distribution	This would incur minimal costs.
Electricity North West	<p>The changes made since the first consultation do not materially affect our earlier response to this question and as such we envisage the proposed solution having a low to medium impact.</p> <p>These costs are one off costs. There is a negligible business cost in updating the SVAA should the 'time band' combinations change but this can be built into the notification process that has a 15 month lead time of such changes to the industry. At the time of the indicative prices being published the SVAA can be notified again providing a three month lead time which is closer to the time when such changes can be factored into their processes.</p> <p>It is difficult to isolate costs as there are interdependencies, for example, P300 will facilitate DCP179.</p> <p>Implementation as part of or outside of a normal BSC Systems Release will not make a difference to these costs.</p>
SmartestEnergy	<p>As previously stated costs for IT system changes for SmartestEnergy to implement P300 as a standalone change should be low. There will also be time spent doing assessment and training but this will largely be sunk. However, development costs for our external system provider are likely to be significant not least because consideration will have to be given to how choices are flagged.</p> <p>We are also aware that there will be a significant staff resource required to effect CoMCs.</p>
Western Power Distribution	<p>Durabill – We are advised by our service provider that to implement changes required for P300 in isolation would cost between £20,000 to £40,000 (split across all DURABILL customers) to cater for profile class 0, changes to MPRS, MPAN registration and MPRS – DURABILL reconciliation. These changes exclude any changes to the precision of metering data and changes to current reports within Durabill.</p> <p>Changes to Durabill could be made outside of a normal BSC release</p> <p>MPRS this is a relatively minor change to MPRS estimated at around 15k ( split across all MPRS users ) – it is planned that these will be incorporated within a scheduled MPRS release</p> <p>Ongoing costs would be in the low £000's.</p>
British Gas	Actual costs are unavailable at this time, but we see the implementation of P300 as a significant cost to amending our

Respondent	Response
	systems. There will also be training costs required.
ScottishPower	<p>Indicative costs for the DNO area only have been provided based on a High Level Impact Assessment and they are in the region of £20,000 to £40,000. These are one-off costs. We do not believe the cost will be any different if the P300 change is made as part of the normal BSC release or outside of it.</p> <p>From a Supplier perspective we have received a high level impact assessment, with associated costs from our service provider with regard to SONET and they have indicated that P300 will directly impact SONET in three key areas and they have identified relevant cost estimates, which we have detailed below.</p> <p>HH Registrations</p> <p>It is expected that the interface to supplier registration systems will require changing to accommodate the new measurement classes and may cost approx. £20,000.</p> <p>Changes will also be required to SONET within the DUoS Validation Module to cater for Validating DUoS charges based on HH Aggregated data supplied on the D0030 plus additional validation to exclude PC 00 from the validation process. The costs of these changes are estimated at £25,000.</p> <p>However the major cost implication is with regard to the HH Validation Module where it is estimated that the cost of changing SONET meet the requirements of P300 are estimated to be within the range of £150,000 to £450,000. This is due to the fact that significant software and hardware upgrades are envisaged to meet the modification's requirements.</p>
RWE Npower	<p>Npower do not believe that P300 can be accounted for as a standalone change, as the implementation and success of the change strongly depends on the implementation of DPC179. Npower does not see the benefits of P300 if DPC179 was not agreed for implementation as the two are inter-linked. Even though the changes are in two different codes BSC for P300 and DUCSA for DPC179, the changes are reliant upon each other to be successful.</p> <p><b>Cost Implications:</b></p> <p>In terms of settlement costs Npower is looking at £10k/£12k this is only an estimate, cost may fluctuate</p> <p>As this is a medium to high impact in terms of the modification complexity and with the intention of the modification, Npower will need to create new models, new clusters, new forecasting techniques, new processes using the assumption that data was available site by site level. At this moment Npower has no cost available to give.</p>
GTC	We do not believe that the costs of this change can be analysed in

Respondent	Response
	isolation as each change is a requirement of the other.
Northern Powergrid	<p>~60k</p> <p>The vast majority of our costs will be one-off costs, with minimal on-going cost due to P300. The one-off costs can be broken down as follows:</p> <ul style="list-style-type: none"> <li>• DUoS billing system changes: <ul style="list-style-type: none"> <li>○ The cost of amendments to our DUoS billing system will cost between £6,000 and £12,000 to implement;</li> </ul> </li> <li>• MPRS system changes: <ul style="list-style-type: none"> <li>○ We expect the cost of an upgrade to be in the region of £15,000. This figure is based on an estimate only as the full impact assessment of the costs of this change on our MPRS system is still in progress. This cost estimate is based on P300 being implemented as part of a normal BSC release. The cost will be significantly increased if implemented outside of a normal release; and</li> </ul> </li> <li>• Internal data transfer system:</li> </ul> <p>The amendments to dataflows being passed internally will cost around £35,000 in changes to our system for carrying out this data transfer.</p>
TMA Data Management Ltd	<p>Low – Medium</p> <p>The costs of implementing the changes will be low to medium. Most changes will be one off with some small on-going additional operational costs.</p>
E.ON	<p>As we set out in our response to the P300 Impact Assessment, we will be impacted as supplier, HHDC, HHDA and MOP. As supplier and MOP we expect relatively small amounts of change.</p> <p>As supplier the continuing receipt of the D0036 and D0275, will minimise the change required although we will need to amend our settlements systems to ensure that we can manage the increase in files and reconcile our DUoS charges effectively.</p> <p>The biggest impact will be incurred as HHDC/DA due to the use of the D0010. Currently HHDC are only required to send a D0010 flow in very rare circumstances and as such this process is carried out manually and is not active in our HH DC automated system. We do now however, believe that we can reduce the external effort for these changes as the system can be configured to send a D0010 although there will still be changes to this mechanism to support the new measurement classes .</p>
SSE Energy Supply	There are a number of system costs and activities that we will incur through implementing P300. Much of the system changes will be

Respondent	Response
Ltd	one-off costs; however there will also be ongoing costs. The bottoming out of any outstanding issues in DCP179 will assist/ more effectively enable P300 in providing the level of detail required to complete detailed cost estimation. Current indications confirm a medium cost is likely.
EDF	It is unrealistic to fully separate the costs of P300 from the costs of DCP179 and P272, given the interactions between them in relation to implementation lead times, implementation dates, and expected numbers of tariffs and HH meters.

Question 4: What are the implementation lead times for your organisation to implement P300 as a standalone change (not including DCP179, P272 or any other change)?

## Responses

Respondent	Response
Power Data Associates Ltd	Not directly impacted.
GDF SUEZ Marketing Limited	Approximately 6 months as this is what we would normally expect for the level of changes envisaged by P300. No difference whether it is part of a BSC release or not.
IMServ Europe Ltd	<p>The latest notification we would require would be 1<sup>st</sup> Feb 2015 to allow adequate time for:</p> <ul style="list-style-type: none"> <li>• Planning and availability of key resource (both being impacted by other industry changes and separate business priorities)</li> <li>• Development</li> <li>• Testing</li> <li>• Deployment</li> <li>• Training</li> <li>• Review of existing commercial arrangements</li> </ul> <p><b>BSC Systems Release:</b></p> <p>There would be no difference in terms of lead times whether P300 is implemented as part of or outside of a normal BSC Systems Release providing the Lead Time was adequate which it appears to be (see Question 5).</p>
UK Power Networks	There is likely to be an impact on the registration system, MPRS, and this will take approximately 6-9 months from blank-page to go-live.
Scottish and Southern Energy Power Distribution	We need a minimum lead time of 12-18 months, dependant on the timing of OFGEM's decision.
Electricity North West	<p>We believe that we have sufficient time to deliver the Modification changes in line with the proposed implementation date and should be able to do so earlier than this date but suggest that a minimum of twelve months from the Ofgem approval would be required.</p> <p>Implementation as part of or outside of a normal BSC Systems Release will not make a difference to these lead times.</p>
SmartestEnergy	6 months
Western Power	Durabill -St Clements do not anticipate any problems meeting an



Respondent	Response
Distribution	<p>April 2016 deadline.</p> <p>It is anticipated that 8-12 weeks lead time would be required to complete the functional developments.</p> <p>MPRS – SCS currently planning to release changes required for P300 as part of a scheduled release due 3rd Qtr. 2015.</p>
British Gas	<p>Not including DCP179, our initial plan suggests a 9 month lead time to implement P300 into our systems.</p>
ScottishPower	<p>Given the level of proposed industry change at present, ScottishPower in its previous response indicated that it would not be possible to implement this change any sooner than the original November 2015 proposed date. Furthermore we believe that the industry should not be constrained by normal system release dates and that if given a year's notice from the approval dates then the release could take place outside the normal cycle.</p> <p>From the DNO DUoS perspective, we believe the lead time for the proposed solution is approximately 8-12 weeks, assuming that the lead time starting point is after the Authority's approval is given.</p> <p>However from a Supplier and Agent perspective we believe that a minimum lead time of one year from the date of the Authority approval is required in order that both our HHDA and HHDC can make IT system changes to accommodate the proposed P300 changes including the revised data flow changes, which will require to go through the MRA change process. We have been advised by our service provider in a high level impact assessment that in order to implement the HH validation required changes they will require a minimum lead time of 12 months. In addition we have made the assumption that the MRA changes will not be progressed until after the Authority approves P300, and we believe the earliest implementation for these changes will be November 2015. Further to the MRA changes, Agents may also have to manage a mass Change of Measurement Class exercise for those customers who are CT metered and are moving to Measurement Class E. We further note that Elexon have a new process for COMC being implemented in the June 2015 BSC release. Similarly, at the same time Suppliers will also have to amend their IT systems to receive the amended data flows, while at the same time put in place processes that will allow them to receive and validate the increase in site specific DUoS bills as the CT customers move to HH tariffs.</p> <p>While the question asks for the lead time for P300 as a standalone change it should be noted that P300 will not work unless DCP179 is implemented and similarly DCP179 will not work unless P300 is approved, however we do recognise that each change while reliant on each other can be implemented at different times.</p>
RWE Npower	<p>Npower would need a lead time of 15 months in order to implement this change.</p>

Respondent	Response
GTC	This is difficult to give estimation as a separation from DCP179 and P272. It is also difficult to provide an estimation of time required as we have concerns around the number of LLFC's available (see additional comments) and believe that this change should not be implemented until this is addressed. Devoid of both of these areas however i.e. changes to our billing system and changes to LLFC's, our lead time would be dependent solely on the development time of MPAS. We do not think that this particular change can have a lead time which is not dependent on its supporting change in other governance.
Northern Powergrid	We are comfortable that any system changes can be implemented ahead of the proposed implementation date. Our response to the impact assessment of minimum 18 months was largely driven by the details of option 2. As this is no longer being taken forward we are comfortable with the lead time proposed.
TMA Data Management Ltd	3 – 6 months. Most of the time is required to design, implement and test the system changes. It would make no difference to our lead time if P300 is implemented outside of the normal BSC Systems Release.
E.ON	<p>It is changes to our HH DC/DA system that will drive how quickly we can deliver P300. Significant testing will have to be carried out as part of the delivery as we do not know that the D0010 process that is currently not being used will work as we expect given that it has never before been utilised.</p> <p>Testing of the changes to our other systems (Sales and Settlement) are reliant on HH DC/DA changes being made and working first which means that it cannot be carried out concurrently.</p> <p>We would therefore, like to see a minimum of 12 months lead time from the point of Ofgem approval.</p>
SSE Energy Supply Ltd	At this point, we remain of the view that a 12 month lead time is sufficient to implement this modification. The key driver is for us to update relevant IT systems, though it should be noted that this is an estimation based upon our current analysis of the modification in its current form.
EDF	<p>The more notice that is given, the more efficiently can internal and third party work be planned and executed, alongside multiple other internal and externally required change projects (including quicker switching).</p> <p>Changes to third party systems used to receive, validate and process DUoS invoicing data could be modified relatively quickly, potentially within 6 months.</p> <p>However, changes to internal customer data, pricing and billing systems to accommodate new HH measurement classes would take significantly longer, particularly those used for domestic customers and some micro-business and small SME customers. 15 months is</p>

Respondent	Response
	<p>considered a minimum necessary to plan, budget, obtain resource, fully assess impacts, contract for services, develop, test and implement changes. This would not provide full support to HH settlement, but interim measures to accommodate any domestic, and some micro or small SME customers acquired on HH as a workaround until they can be reverted to NHH.</p> <p>There are also potential impacts on customer tariffs dependent on the actual DUoS charge levels that would be used. Advance notice allows these to be considered more accurately when deciding customer prices.</p> <p>Provided sufficient notice is given and there is co-ordination with related changes such as DCP179 and P272, it is unlikely to matter whether P300 is implemented as part of a BSC Systems Release or as a stand-alone release. It is sufficiently wide-ranging and significant to justify a release of its own.</p>

## Question 5: Do you agree with the Workgroup's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
14	2	-	1

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Other	Would prefer to see April 2015 as per Ofgem's desire
GDF SUEZ Marketing Limited	No	No. It would be preferable if the P300 implementation was aligned with DCP 179.
IMServ Europe Ltd	Yes	<p>An implementation date of 01/04/2016 (subject to Authority's decision on or prior to 31/12/2014) allows adequate lead time for:</p> <ul style="list-style-type: none"> <li>• Development</li> <li>• Testing</li> <li>• Deployment</li> <li>• Training</li> <li>• Review of existing commercial arrangements</li> </ul> <p>For the changes to the systems and processes that P300 would require from us in order to be able to accept the new Measurement Classes as HHDC/DA/MO.</p> <ul style="list-style-type: none"> <li>• As DA we would need to modify our systems to submit data to SVAA using the new Measurement Classes via the D0040 and D0298 'BM Unit Aggregated Half Hour Data File' flows.</li> <li>• As DC we would need to modify our systems to send D0010's to LDSO's (not D0036's) and D0036 &amp; D0275 to the Suppliers.</li> <li>• As MO we would need to amend our systems to be able to send and receive these amended flows</li> </ul>
UK Power Networks	Yes	The current implementation date for P300 is appropriate, however due to the interaction with P272 and DCP179 this cannot be considered in

Respondent	Response	Rationale
		<p>isolation. If there is a delay to DCP179 beyond the effective date of P300 in Autumn 2015, then the implementation of P300 could also be deferred. However, P300 must not be unduly delayed because of the knock on effect on P272.</p> <p>In addition, we should be mindful of the timing of changes required to the registration system, MPRS, which is expected to be undergoing testing with the DCC commencing in the second quarter of 2015.</p>
Scottish and Southern Energy Power Distribution	Yes	-
Electricity North West	Yes	This allows sufficient lead time for the majority of parties to implement the Modification.
SmartestEnergy	Yes	The Workgroup recommends an Implementation Date for P300 of 1st April 2016 if the Authority's decision is received on or before 31 December 2014. We believe six months would have been adequate and even if the Authority's decision is not received before 30th September an implementation date of 1st April 2016 should be achievable.
Western Power Distribution	Yes	This release date is achievable for our service provider and internal implementation project and is sensible as it is at the start of a regulatory year.
British Gas	Yes	-
ScottishPower	Yes	Given the multiple system changes, some complex, that will be required across various aspects of the organisation it seems sensible to ensure that an appropriate amount of time is given to resource, manage, and test prior to the implementation of this change.
RWE Npower	Yes	Npower believe the proposed lead time of 15 months is adequate.
GTC	No	Whilst we have no issue with the date proposed we cannot agree to the date until the potential LLFC changes have been addressed.
Northern Powergrid	Yes	We recognise the benefits of implementing P300 as soon as possible, and so agree with the approach of implementing in April 2016 provided a decision is made by December 2014.
TMA Data Management Ltd	Yes (conditional)	Yes <b>IF</b> the implementation times given in the IA are accurate in only considering P300. However, if the consultation brings out that respondents were

Respondent	Response	Rationale
		including implementation of DCP179 and the timescales for P300 are actually shorter than TMA would welcome a faster implementation.
E.ON	Yes	We would like to see a minimum of 12 months delivery lead time but appreciate that others may need longer. We believe that April 2016 is appropriate, both in terms of development time but also because DCP179 is not dependent on the delivery of P300 so this date does not delay its implementation.
SSE Energy Supply Ltd	Yes	As noted in the Work Group Report, an implementation date of 1 April 2016 should allow completion of both the required internal/ external IT changes and where relevant, consideration of our non-domestic customers. It also cannot be understated that the successful progression of DCP179, including agreement and Authority consent of the implementation date is a key dependency of P300.
EDF	Yes	<p>15 months notice should be sufficient to implement the proposal in a reasonably efficient and reliable manner if it is approved.</p> <p>Implementation at 1 April has been proposed. This, and 1 October, corresponds with particularly high levels of supply business activity in finalising new, and reconciling ending or annual contracts. It has been suggested that implementation avoiding these dates would avoid a staff resource clash, given that implementation of the change may involve an increased level of internal familiarisation, query and issue resolution with the new functionality.</p> <p>Further consideration should be given to whether time should be allowed for transition of meters in existing measurement class E which would belong in new measurement class G from the implementation date, or whether a "big bang" approach would be expected on the implementation date. This would be particularly significant if use of the new Measurement Classes F and G were to be made mandatory, rather than there being a voluntary choice between F/G and existing site-specific E (or C). A "big bang" approach might require additional processes and resources.</p>

Question 6: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P300 which would better facilitate the Applicable BSC Objectives?

## Summary

Yes	No	Neutral/No Comment	Other
15			2

## Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	-
GDF SUEZ Marketing Limited	Yes	The creation of the new Measurement Classes looks like the best way forward but we would refer to our comments in Question 1 regarding the limitations of Measurement Class "E".
IMServ Europe Ltd	Yes	<p>The proposed solution is an efficient and cost effective way of providing the LDSO's with the metered data they require, allowing them to distinguish easily between sites that are calculated on a site specific basis and sites that are calculated on aggregated basis whilst also supporting the implementation of other changes such as DCP179 and P272. The proposed solution seems the most straight-forward and efficient way of enabling more reflective DUoS charges therefore potentially promoting competition but also increasing the accuracy and efficiency of the Balancing and Settlement arrangements.</p> <p>The proposed alternative solution would have a higher impact on more parties thereby extending the required implementation timeframes. All Party Agents would be required to make more extensive changes to their systems and processes, the cost of which would likely be reflected in Supplier agent charges.</p>
UK Power Networks	Yes	We agree with the workgroup's view that no alternative modification would better facilitate the BSC objectives.
Scottish and Southern Energy Power Distribution	Yes	-
Electricity North	Yes	This has been explored during both P280 and P300 and in both instances has resulted in this refined

Respondent	Response	Rationale
West		solution.
SmartestEnergy	Yes	-
Western Power Distribution	Yes	-
British Gas	Yes	-
ScottishPower	Yes	-
RWE Npower	Other	Sites currently within Measurement Class E have elected for HH settlement. We do not believe it appropriate that these sites should be treated differently to their current arrangements as a result of this modification. An alternative modification that allows these sites to remain within Measurement Class E would seem appropriate to allow the continuation of customer choice
GTC	Yes	-
Northern Powergrid	Yes	We agree with the Workgroup that the proposed solution is the most cost effective solution to enable the implementation of DCP 179, and as such there is little more within the scope of P300 which can be done to enable the facilitation of the objectives.
TMA Data Management Ltd	Yes	While we believe the Alternative considered as part of the Modifications process is more in keeping with the Supplier hub principle, TMA recognises that the indicative costs involved in are much higher than for the Proposed. Therefore, the Proposed is the most efficient and economical solution.
E.ON	Yes	We agree that there are no alternative solutions which would better facilitate the Applicable BSC Objectives.
SSE Energy Supply Ltd	Yes	No further comment.
EDF	Other	We have previously suggested an alternative solution focussed on PC5-8, with an implementation timescale of no earlier than April 2016.



Question 7: Do you believe that P300 should include a Measurement Class 'H', which would be used for non-domestic CT Metering Systems that would have aggregated DUoS billing?

## Summary

Yes	No	Neutral/No Comment	Other
3	6	2	5

## Responses

Respondent	Response	Rationale
Power Data Associates Ltd	No	<p>No – The roll out of smart metering is requiring all meters (PC1-4) to become smart meters or HH capable.</p> <p><b>Domestic customers</b></p> <p>The roll out of smart metering is requiring all whole current meters (PC1-4) to become smart meters. Ofgem also require all CT domestic customers to install a HH capable meter. The DCUSA proposal is to utilise one MC to cover PC1-2 for WC &amp; CT. The BSC text constrains this to anything which is not a 100kW site. I believe this is correct. My comments to DCUSA are that the DCUSA change should also restrict the use of this MC to less than 100kW sites to ensure consistency between the codes. Having said that, I believe that some existing domestic customers (footballers houses!) are probably already trading HH and I believe this should be able to continue. So while the domestic should only be domestic customers (subject to comment below), the CT HH "non-domestic" MC could also include domestic customers, as the over 100kW does today.</p> <p>I have previously expressed the view that domestic CT customer should be required to trade HH, but I defer to the view of the majority to establish a whole current and CT up to 100kW for domestic customers. I see this as a timing issue, and will happen in a few years.</p> <p><b>Non-Domestic customers</b></p> <p>All over 100kW customers are already required to trade HH. The proposal will allow PC3-4 whole current non-domestic customers to trade NHH or HH. Some whole current and CT customers will already trade HH and be in MC E. The gap remains with the PC3-4 CT customers. The smart metering roll out has required all PC1-4 to have smart meters</p>

Respondent	Response	Rationale
		<p>or HH capable meters (ie CoP5/10), so over the next few years they will be HH capable. In my view as they have CT metering the capacity for consumption is larger than a whole current meter, and they should be required to trade on a HH basis. Effectively changing the boundary from PC5-8 based to everything that is non-domestic CT should trade HH. This leads to a timing issue, of when to mandate.</p> <p>Many of the CT customer probably already have a HH capable meter and no-one has been fitting 'simple' meters for years, so any PC3-4 CT meters are either very old, out of certification, incorrectly described as CT, or have an incorrectly assigned PC. Any HH meter will probably meet the requirement to be described as a PC5-8 metering system, as it will have an MD recording mechanism, which makes them subject to P272. The DCP179 numbers indicate a few tens of thousands. I would suggest they are reviewed by their suppliers and correctly described. Based on this further information a more informed decision can be made.</p> <p>At that stage, choices may be to mandate to trade HH, like PC5-8. Or if the numbers are small, then they could be bundled in with the domestic for a short period. Or a new MC could be invented, however the numbers are small, and will get smaller over the next few years so the benefit of another MC is small and declining.</p>
GDF SUEZ Marketing Limited	Yes	We believe that this could address the issues identified in our response to Question 1 and should be explored further.
IMServ Europe Ltd	Neutral	We are neutral to this suggestion as there is no benefit to us from this additional Measurement Class. The additional cost of implementing an additional measurement class at the same time as the others is minimal.
UK Power Networks	Other	There would need to be clear rules and understanding as to whether a non-domestic CT metered customer should be aggregated or not i.e. if they should be E or H. Introduction of H will impact the timing and additional work required for DCP179 which has assumed all CT metered customers will have HH tariffs, including capacity charges etc., elements of which could not be charged on an aggregated basis.

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Other	We would like to see evidence of sufficient customer numbers that would fall into this category to warrant the change.
Electricity North West	No	<p>P300 is facilitating DCP179. DCP179 is very specific. CT metered customers (other than Domestic customers) will be billed on a site specific basis. This is based on the need to agree a capacity with the customer for such connections and the fact that Distributors cannot receive metering data which relates to a period of less than one month (Distribution licence condition 10A). Since there is no requirement within DCP179 to request such an aggregated tariff we should not build into this change proposal such a measurement class. We must remember that Ofgem (as part of their reasoning for rejection of P280) were concerned over the number of additional Measurement Classes and whether they would be used or not.</p> <p>We do however recognise the concern that one respondent to the first consultation raised over the proposed supply licence changes where there may be an issue on Micro Businesses also being impacted by such a provision relating to access to data. Whilst this is not in the distribution licence it will be a cause for concern over suppliers having access to the data to verify the bill sent by distributors. It would be helpful to understand Ofgem's views here since this may impact both DCP179 and P300. It must be recognised however that Distributors would not know whether a customer is also recognised as a Micro Business due to the definition of such including an "or statement" relating to the number of employees.</p> <p>If we do need to cater for this in the future we would not be supportive of a distinct Measurement Class since we suspect that numbers would be very small. We may wish to consider in the future amending the definitions of Measurement Class E and Measurement Class G to:</p> <p><b>Measurement Class E</b></p> <p>"Half hourly Metering Equipment at below 100kW Premises with current transformer and not at Domestic Premises <b>or Micro Business Premises</b>"</p> <p><b>Measurement Class G</b></p> <p>"Half hourly Metering Equipment at below 100kW Premises with <b>current transformer at Micro Business</b></p>

Respondent	Response	Rationale
		<p>Premises or whole current and not at Domestic Premises"</p> <p>This should only be considered as part of the outcome from the supply licence change if it is made.</p>
SmartestEnergy	Other	Please see our answer to Q[9].
Western Power Distribution	Neutral	If the working group believe there is justification for this group of customers being aggregate billed – we have no objection.
British Gas	Yes	We think there is merit in maintaining an option for customers who are <100kW to choose whether they want to be billed on a site specific or aggregated basis. This is to avoid existing non-domestic CT <100 kW customers incurring the uneconomic expense of changing meters to WC simply to avoid being forced to move to a site specific tariff.
ScottishPower	Other	<p>ScottishPower raised this situation at the last P300 Work Group meeting, in that we believe a new measurement class 'H' should be included for Non-Domestic CT customers as we believe that they should be allowed to be continued to be billed under the more efficient existing Supercustomer methodology (i.e. aggregated consumption). We are concerned that the current P300 and DCP179 as they stand will effectively mean such customers must move to HH, which does not meet the modification's underlying purpose, which is to provide these customers with a tariff 'equivalent' to HH.</p> <p>We believe that there may also be a particular issue with those customers who are CT metered and are currently in Profile Classes 3 and 4 in that Condition 47 (which Ofgem are minded to position) which is currently out for consultation from the Smarter Markets Group, prohibits the use of consumption data which relates to any one or more periods of less than month (47.17(i)). Therefore in order to obtain this information we believe a new measurement class as proposed above is required similar to that for F and G.</p>
RWE Npower	-	<i>Not responded</i>
GTC	No	No. As this is based on a requirement which has yet to be decided upon it would not be sensible to include this at this time. If a subsequent change was required at a later date it could be raised at

Respondent	Response	Rationale
		that time. To include this change now may add confusion or delay to the CP should the proposed measurement class H not be required.
Northern Powergrid	No	We note a question in the consultation document regarding a third new measurement class 'H' which we have not commented on. We do not support the introduction of this third new measurement class as we are in favour of implementing the boundary between HH site specific and HH aggregate settlement as proposed by DCP 179, with all CT metered customers being billed HH site specific. We support the clear boundary between site specific and non-site specific settlement and the introduction of a third new measurement class would erase this, leaving us in a similar situation to the present where certain customers are in a position to choose their DUoS tariff which is not cost reflective.
TMA Data Management Ltd	No	A further Measurement Class H should not be included in P300 for the reasons stated in the consultation document; P300 should facilitate DCP179 which does not currently require an additional Measurement Class.
E.ON	No	We do not believe that a further MC H is required. We believe that WC and CT non domestic can be combined into 1 measurement class for individually billed sites.
SSE Energy Supply Ltd	Yes	<p>We support the inclusion of Measurement Class 'H' for non-domestic CT Metering Systems. As part of this solution we seek further clarity on the use of the proposed and redefined Measurement Class 'E'. In settlement, for example, what will distinguish a non-domestic CT Metering System &lt;100kW that falls into the redefined Measurement Class 'E' or those which are aggregated and fall into 'H'? Furthermore, how will this be</p> <p>We support the inclusion of Measurement Class 'H' for non-domestic CT Metering Systems. As part of this solution we seek further clarity on the use of the proposed and redefined Measurement Class 'E'. In settlement, for example, what will distinguish a non-domestic CT Metering System &lt;100kW that falls into the redefined Measurement Class 'E' or those which are aggregated and fall into 'H'? Furthermore, how will this be communicated to relevant market participants.</p>

Respondent	Response	Rationale
EDF	Other	<p>We have not had time to properly consider this question. Initial view is that the number of new Measurement Classes is not critical provided:</p> <ul style="list-style-type: none"> <li>a. Each measurement class is clearly and unambiguously defined and participants can easily establish the measurement class to which any individual meter belongs. Use of major physical characteristics of the metering system such as whether it is CT or WC should make this possible.</li> <li>b. Sufficient time is given to establish the status of existing meters and perform a change of HH measurement class to the newly defined class, if necessary. This could be by a phased transition; if a “big bang” approach is used it should be well planned with plenty of notice.</li> </ul>

**Question 8: Do you believe that there will be potential issues with the number of LLFCs should P300 be approved?**

**Summary**

Yes	No	Neutral/No Comment	Other
5	5	4	2

**Responses**

Respondent	Response	Rationale
Power Data Associates Ltd	No comment	I have no comment.
GDF SUEZ Marketing Limited	Yes	This could be an issue, but would be mitigated by allowing more NHH to HH COMCs to move to measurement classes where aggregated, rather than site-specific DUoS charges were made.
IMServ Europe Ltd	No	No. At this time we believe the size and format of the LLFC number is adequate at 'nnn' to cover the increase in the number of LLFCs following the implementation of P300. i.e. we are in agreement with the Workgroup that there is no need to amend the format at this time. However as it may become necessary in the future to amend this size and format to 4 or more numeric and/or alphabetic characters it is worth considering monitoring the number of LLFC's and re-visiting this at a later point in time should the need arise.
UK Power Networks	No	We do not expect to have any issues with LLFCs.
Scottish and Southern Energy Power Distribution	Yes	<p>This is a concern for us as a DNO that operates outside our host areas and we believe this is a particular concern to IDNOs. However, this is not an adequate reason to not support P300.</p> <p>P300 is desirable given current charging aspirations; but it's also apparent that, in the short to medium term, an industry solution is required to address this LLFC shortage issue.</p>
Electricity North West	No	We would only need two additional LLFCs. We do recognise that this may however be an issue for Independent LDSOs and at some point there will need to be a change to the data item to either the physical length or to the logical format. We favour the latter in making changing it to accept both alpha and numeric values.

Respondent	Response	Rationale
SmartestEnergy	Yes	Some rationalisation may be required.
Western Power Distribution	No	We plan to only use one LLF per m/c so therefore we would only require 2/3 LLF's per DNO area and therefore whilst the number of available LLF's is diminishing – we do not see this as an immediate issue.
British Gas	No	We feel the DNO is best placed to answer this.
ScottishPower	Other	While we do not believe that P300 will cause any issues with the number of LLFCs in the short term, we do believe that it could exacerbate the issue and that the industry should now consider a review under a separate process to determine the best way to manage the LLFC issue going forward.
RWE Npower	-	<i>Did not respond</i>
GTC	Yes	Yes. Each distribution business has approximately 999 LLFCs to utilise. As an IDNO this means that we have approximately 71 LLFCs for each GSP group. We have currently used 517 LLFC's under our ETCL licence. In order to facilitate the billing requirements under DCP179 and then by extension P300, for us we will require an LLFC by voltage level, for each aggregated HH tariff across all 14 GSP groups. We would therefore be required to generate circa 250 LLFC's to facilitate this change but this may need to be duplicated if we had to facilitate embedded networks i.e. we would require 500 LLFCs. Potentially this does not take us over the limit of LLFC's currently provided if embedded networks are excluded however another change which has been raised under DCUSA, DCP 137 will also require us to raise over 500 LLFC's. It is therefore not possible to raise all of the LLFC's currently being proposed should both changes be approved. If P300 solely goes ahead and embedded network LLFC's are required this will still take us over the current limit of LLFCs. If embedded networks were excluded however we would have spare LLFC's if DCP137 is not approved but it does not leave a lot of scope for any future changes and any requirements to raise LLFC's. It is clear that this area must be explored in order to facilitate the changes being proposed under P300 and we believe this should be factored into the implementation date of this change.



Respondent	Response	Rationale
Northern Powergrid	Yes	We have also been asked to comment on whether we will have issues with available LLFCs. At present we have sufficient identifiers available, but there are several changes in progress which, if approved, will reduce this number significantly and lead to potential problems in the future.
TMA Data Management Ltd	No comment	We have no comment regarding the number of LLFCs.
E.ON	No comment	-
SSE Energy Supply Ltd	Neutral	We suggest DNOs are best placed to comment on this issue in the first instance.
EDF	Other	We have not had time to fully consider this question.

## Question 9: Do you have any further comments on P300?

### Summary

Yes	No
6	11

### Responses

Respondent	Response	Comments
Power Data Associates Ltd	Yes	<p>The terminology of the different Measurement Classes needs to be refined. The BSC document refers to "not 100kW metering systems", the DCUSA change does not identify this condition.</p> <p>Although this MOD does not mandate trading PC3-4 with CT metering on a HH basis, it is debatable whether these MPANs really should be considered as PC3-4. The BSC should seek to require Suppliers and NHHDC to review their classification, and where necessary amend PC to 5-8 or identify that they are no CT metered. If they are CT metered then the industry will probably have, or will be fitting HH capable metering over the next few years. Over a longer timescale they should be mandated to trade on a HH basis.</p>
GDF SUEZ Marketing Limited	No	-
IMServ Europe Ltd	Yes	<p>Questions raised during the previous consultation which are still outstanding:</p> <p>Q) Are changes required to the D0289 flow specifically the J0082 (Measurement Class Id) – Notification of MC/EAC and PC (Supplier to HHDC and Supplier to MOP).</p> <p>Q) How will the Consumption Component Class ID (J0160) be notified to the HHDA?</p> <p>Q) How will existing Measurement Class E sites be handled? Will these all be re-registered/re-categorised into the new Measurement Classes E,F and G. If so, will this be part of the P300 implementation and how will it be managed?</p> <p>Q) Will changes need to be made to ECOES to handle the new Measurement Class and following on from the above question, will there be a requirement for parties, party Agents to update ECOES.</p>

Respondent	Response	Comments
UK Power Networks	No	As noted above of P272 is dependent upon of P300 and this must be considered when finalising the implementation date of P300.
Scottish and Southern Energy Power Distribution	No	-
Electricity North West	No	-
SmartestEnergy	No	<p>It is unclear to us why, as a consequence of the given definitions of MCs E, F and G, it is not possible to have a site specific bill on a site with a whole current meter.</p> <p>We also feel that it should be explicitly stated that the purpose of the MC is changing i.e. it is our understanding that the supplier is using the MC to request site specific billing whereas previously this would be determined by the distributor.</p>
Western Power Distribution	No	-
British Gas	No	-
ScottishPower	Yes	<p>We would like to seek clarification on issue with regard to P300, DCP179 and P272.</p> <p>The P272 intention is to move all PC5-8 customers on to a HH with site specific DUoS bills, however the P300 intention is that Non-Domestic Whole Current metered customers will either remain as NHH or move voluntarily to the new Measurement Class G, which means they will be treated as HH but still continue to have their DUoS billed under the aggregated Super Customer methodology.</p> <p>If P272 is approved, what will happen to those Whole Current metered customers who are PC5-8, will they be mandated to move to the new Measurement Class G (which P272 could not reference at the time) or will they have to move to Measurement Class E as indicated by P272.</p>
RWE Npower	No	-
GTC	No	-
Northern Powergrid	No	-
TMA Data	Yes	1. We would welcome a review of Supplier Charges following the implementation of

Respondent	Response	Comments
Management Ltd		<p>P300/P272 to assess the appropriateness of R1 – R3 SP08c charges being £0.00.</p> <p>2. The default EAC currently applied to HH Metering Systems is based on the assumption that these are &gt;100kW systems. Would it be more appropriate to introduce different values for each Measurement Class?</p>
E.ON	Yes	<p>It is not clear when the renaming of Measurement Class E happens and the new MC's are introduced, what the process will be for re-categorising the existing customers. Will it be with immediate effect?</p> <p>If the use of the new MC's was mandated we would have in the region of 9k sites to manually reallocate from Profile Class 0, this would be very manually intensive and we would prefer for it not to be mandated as it would not be possible to make these changes quickly. Sites on Profile Classes 5-8 would be reallocated as they were moved to HH, we see no reason why those sites currently on PC 0 need to be moved.</p>
SSE Energy Supply Ltd	Yes	<p>Further to our response to the P300 Impact Assessment, we reiterate the need for a considered approach to coordinating the wider suite of changes, i.e. P300, DCP179 and P272. As part of this, we welcome the P300 work group to consider the management of the migration exercise and the wider transitional arrangements. Is it envisaged that a timeline of events may be proposed, where possible, at the P300 workgroup.</p> <p>Question 1 asks whether we agree that P300 better facilitates the Objectives of the BSC. We recognise the need for all modifications to stand alone on their merit in meeting the Objectives, however the wider and most accurate benefits case is made on the suite of changes (P300, DCP179, P272) and would welcome the workgroup considers whether it would be appropriate for a joint/ shared benefits case to be agreed.</p>
EDF	No	None at this time.