Stage 03: Inpact Assessment Responses

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

This Impact Assessment was issued on 12 May 2014, with responses invited by 2 June 2014.

What stage is this document in the process?

- 01 Initial Written Assessment
- 02 Definition Procedure
- 03 Assessment Procedure
- 04 Report Phase

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON	5/7	Supplier, Half Hourly (HH) Data Collector (DC), Non Half Hourly (NHH) HH DC, Meter Operator Agent (MOA)
EDF	10/0	Supplier / Party Agent / Consolidator / Generator / Exemptable Generator / Trader
SSE	1/1	Supplier, Party Agent
Scottish Power	3/1	Supplier, Distributor, HH Data Aggregator (DA) and HHDC
SmartestEnergy Limited	1/0	Supplier
British Gas	1/0	Supplier
Stark Software International Ltd	0/4	HH and NHHDA, HH and NHHDC
TMA Data Management Ltd	0/1	HHDC/HHDA
RWE Npower	10/0	Supplier/Generator/Trader/Consolidator/Exemptible Generator/Party Agent
GTC	2/0	Distributor
Electricity North West	1/0	Distributor
Western Power Distribution	4/0	Distributor

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Northern Powergrid	2/0	LDSO
Salient Systems Limited	0/1	Software and systems provider
GDF SUEZ Energy UK	1/0	Supplier
IMServ Europe Ltd	0/6	HH and NHHDA HH and NHHDC HH and NHHMOA
SSEPD	2/0	Distributor
UK Power Networks	3/0	Distribution

Question 1: Will P300 impact your organisation?

Responses

Respondent	Response
E.ON	Yes This change will impact us as supplier, HHDC and MOP. As supplier and MOP we expect relatively small amounts of change. As supplier change is minimised due to the option of receiving the D0010 or to continue receiving the D0036 and D0275, however, we will need to amend our settlements systems to ensure that we can reconcile our DUoS charges effectively. There would also be a cost to reallocating current customers on the existing measurement class 'E' to the new measurement classes if DCP127 mandates the use of the most appropriate measurement class. We will also have to change our sales tool as it will have to allocate customers to the correct measurement class. It is not clear from the proposal whether PC '5-8' customers will be moved to PC '0' as part of the process. Sites where a supplier has been unable to fit AMR despite reasonable efforts will require a profile in order for them to be estimated, clarity is required as to how this will be achieved. The biggest impact will be incurred as HHDC/DA due to the use of the D0010. Currently HHDC do not use the D0010 so to introduce this into our HHDC systems will be costly and time consuming. We would like the P300 work group to consider the continued use of the D0036 as set out in our response to question 4.
EDF	Yes At first sight, P300 appears a straightforward way of classifying customer sites to support development of new DUoS billing and charging approaches to be used with advanced and smart HH metering. However, because existing processes for change of measurement class from NHH to HH and vice versa are not well suited to large numbers of meters, there would be significant consequential impacts. On closer analysis the solution is surprisingly complex because of the inherited existing processes, both centrally, and also within EDF Energy and its agents. **Impacts on PC1-4** P300 would not obligate PC1-4 Metering Systems to be registered as HH. However, P300 could encourage some Suppliers to register customers in PC1-4 as HH. The discretionary nature of HH settlement for PC1-4 would mean that if we (or any other Supplier) acquire a customer who has been registered with a new HH measurement class, we would either have to also settle HH, or re-register the HH customer as NHH. As a company, we support the aspiration for HH settlement to

Respondent	Response
	become the norm in a smart metered environment. While we support the intent of both P300 and DCP179 (i.e. acting as an enabler of less data-intensive yet flexible HH DUoS charging, thus removing barriers to HH settlement created by current DUoS charging methods), in practice the impacts of the detailed proposals on existing systems and processes would be significant. We think the issues would be better dealt with as part of an integrated solution for new registration and data processing methods expected to be developed in conjunction with the DCC under Smart Metering. We believe this would be a more efficient approach. Because we do not have visibility of likely take-up of HH settlement for sites currently in PC1-4 under P300 and therefore the likely volume we may need to handle pre-DCC, it is very difficult to scale a solution. A fully scaled solution would cost in excess of £5m. A tactical solution could be less expensive but expose us to compliance risks which could lead to costly fines and reputational damage, not just to ourselves, but to the industry as a whole. Re-registering the customer is also complex. When combined with timescales for change of supplier, this would effectively require HH functionality, even if only for a short period while transfer to NHH is completed. This would create a number of challenges: - Incompatibility with quicker switching process. Timeframes for Change of Supply (CoS) coincident with a Change of Measurement Class (CoMC) from HH to NHH would be outside those that will be available to us under quicker switching processes due to be implemented in November 2014. Without further changes to those processes we would be unable to convert a HH domestic back to NHH by the Settlement Start Date (SSD) leaving the customer change process in disarray. This would need to be addressed as a consequence of the facilitation of HH settlement by P300, and would require changes to Supplier, MOP and Data Collector processes, as a minimum. Suppliers would also have to change their 'gain' process. Otherwise, there would be a huge risk to Supplier compliance. - Managing customer expectation. Customers will not always be aware of the difference between NHH and HH, and that not all Suppliers will be able to settle all customers half-hourly. This could result in confusion over tariffs being offered and consumption data made available to customers. **Impacts on PC5-8** This would depend upon what the structure and level of distribution charges for different classes of customer turns out to be. To effect the change we would undertake a standard CoMC activity - whilst there are attendant costs to the process they are business as usual – but we do not normally undertake anything like 10,000

Respondent	Response
	changes or more in a 12 month period. **Impacts on PC5-8** This would depend upon what the structure and level of distribution charges for different classes of customer turns out to be. To effect the change we would undertake a standard CoMC activity - whilst there are attendant costs to the process they are business as usual – but we do not normally undertake anything like 10,000 changes or more in a 12 month period. Leaving aside the mechanics of the change, and assuming no on-site reconfiguration or meter changes are necessary (so remote re-programming): Project team of 15 FTE + Manager to book the jobs/change of agent etc, plus some customer engagement - £300K per annum Sales activity to convert NHH contracts to HH – 5 FTE: 200K per annum The costs which we cannot quantify easily are: Cost of early termination of NHH supply contract Cost of termination of NHH agent contracts (Meter Operator; Data Collector), especially where that agent could no longer service the site as they are not accredited as HH Penalty costs from Ofgem if we cannot convert all the sites in the allotted timescales
SSE	Yes There will be significant impacts to SSE Supply. At a high level these include IT changes to our registration billing and settlement systems. Activities will include renegotiation of contracts with our Agents and customers. We will also need to consider and implement an approach to migration that mitigates customer harm yet maintains our ability to maintain settlement performance.
Scottish Power	ScottishPower will be impacted across nearly all of the businesses it currently operates. Our Distribution billing system will have to be adapted to receive the new aggregated data flows. In addition it will also be required to issue a significantly increased volume of HH site specific bills for those customers who move on to the proposed Measurement Class E. We will also require to amend the current MPRS Interface, MPRS – DUoS Billing application reconciliations, MPAN Registration and Management Reports. From a Supply perspective, we will have to manage the new data flows, put in place a method that will allow reconciliation on the new HH aggregated data and we will also require to manage the increase in site specific DUoS bills. In addition the Supply business and their agents will need to put in place a robust process to manage the

Respondent	Response
	ensuing large number of Change of Measurement Class activity that will occur. Finally from an agent perspective we will need to amend our IT systems to ensure that LDSOs, Suppliers and Settlement receive the correct information for their purposes.
SmartestEnergy Limited	Yes We will need to change our systems to read in and send flows with new Measurement Classes and ensure that the systems can effectively manage the flows that we elect to receive. The arrangements will also require some COMC from E to G.
British Gas	Yes We will need to make system changes to create the measurement classes and process the new data items correctly If we are mandated to use the new measurement classes will need to build these into our change of measurement class process. The new settlement classes "F" and "G" state a settlement performance of 99% on actual data by R1. This is a significant increase in performance from the current performance level for this class of site (97% on actual data by RF). We would suggest that the workgroup reconsider this performance level and consider a phased increase in performance starting at 90% by R1 and increasing the threshold in the light of actual performance. We will need to communicate the proposed changes to customers should any of the requirements mean a change in costs for the customer.
Stark Software International Ltd	Yes There would be significant impact to develop, implement and adopt the proposed changes on both HHDC and HHDA. The alternative solution would have higher impact. Impacts would be in terms of provision of resource to specify and implement, there would be collateral impact on training and procedures. All of the above would incur cost with no benefit accruing to HHDC/HHDA.
TMA Data Management Ltd	Yes The implementation of P300 will require changes to both our HHDC and HHDA systems and their associated local working procedures. The changes to HHDA under the alternative would be slightly more, but we believe that this solution would be better for the Industry.
RWE Npower	Yes

Respondent	Response
	Preliminary analysis suggests that this change will impact both our systems and processes, in order to deal with data flows.
GTC	Yes As a distribution business we will be affected in the ways outlined in the consultation document. Changes will need to be made to our billing system, our registration system, possibly our industry data i.e. LLFCs and possibly our network connection to the DTN due to the increased volume in data flows.
Electricity North West	**Common to both options:** There will be a need to: • create new LLFCs - updates to MDD of MTC/LLFs combinations; • process MDD data which includes the new Measurement Classes in the relevant systems; • create business rules associated with the new Measurement Classes; • review/update validation rules for SMRS; • ensure billing is not undertaken on a site specific basis; • ensure the correct LLFC is applied by the Distribution system and sent to SMRS associated with the new Measurement Classes; • system testing; and • create/amend document processes. **Impacts of the P300 Proposed Solution:** Provide SVAA with a distributor SSC/TPR (time band) combination for each relevant LLFC or use an unrestricted SSC and a default SSC where an incorrect LLFC is received. This allows for the distributor to determine which solution matches their current billing system to minimise any costs. **Impacts of the P300 Alternate Solution:** Changes to distribution billing system to receive and process two new dataflows; Create the time band combinations within the billing system; and Changes to distribution billing system to create and send two new dataflows based on daily statements for Suppliers and LDSO's. The main impact between the two solutions surrounds the system changes associated with four new flows vs. the processing of an existing flow.

Respondent	Response
Western Power Distribution	For both solutions changes will be required to: SMRS – to allow for the new Measurement classes – With Measurement Class 'E' being split the validation for all three ('E', 'F' and 'G') will follow the same validation in MPRS as with the existing Measurement Class 'E'. As these are all Half Hourly Measurement Classes no Standard Settlement Configuration will be set but Profile Class '0' will be used. This Profile Class '0' will continue to be set to null on the outbound Supplier flows but will continue to be output on the appropriate DB instructions. There are no changes to the structure of incoming or outgoing flows HHMOA – – to allow for the new Measurement classes and possibly increased volumes of agent appointment For Proposed Solution changes will be required to : DUoS Billing System. (Durabill) – proposed solution - The following areas have been identified as being impacted by the introduction of new measurement classes: • MPRS Interface • MPRS – DURABILL reconciliations • MPAN Registration • Management Reports. **MPRS interface** The interface to MPRS will need to be amended to cater for the new measurement classes. **MPAN registration** The MPAN registration process will need amended to cater for the new measurement classes. **MPRS – DURABILL Reconciliation** Reconciliation of D0030 MPAN counts held in DURABILL against MPRS data may need to be amended to cater for the new measurement classes. Currently the comparison is based on Supplier and LLF combination for a specific Settlement Date. **Flow Routing.** DTC validation – Flow routing system validates against MDD , requirement 4 states P/C 0 will not be added to MDD , however it will be shown in the D0030- therefore it will fail validation , unless DTC validation is turned off for the D0030/D0314 – therefore billing system will be relied on for any validation (Changes may be required) Alternative solution changes required to : Durabill- this will require changes to the billing system to

Respondent	Response
	incorporate new aggregation flows from HHDA 's Dxxx & Dyyyy and be able to send new daily statement flows to suppliers & IDNO's This could involve sending either multiple daily statements for a settlement day for each supplier , or alternatively aggregating Dxxx/yyy to send 1 daily statement for each supplier/IDNO per settlement day/run - In addition to changes identified in option 1 St Clements anticipates that processing aggregated metering data received from the HHDA instead of the SVAA will require the: • Loading and validation of 2 new data flows - equivalent to the existing D0030 and D0314 • Creation of new data structures to hold the metering data against – St Clements does not believe the existing Settlement Class structure can be used to load the new metering data against • Creation and allocation of new Tariff structures to be used in the HHDA Billing • Creation of a new daily HHDA Billing process • Generation of 2 new data flows - equivalent to the existing D0242 and D0315 • Creation of a new daily HHDA invoice process and invoice formats • Creation of new control reports and interfaces to existing accounting systems Dxxx & DYYY – potential to be received from many HHDA's rather than one D0030 from SVAA - monitoring will be required to ensure all flows have been received from all HHDA operating in each area., with a potential to miss a flow prior to billing or hold up billing effecting cash flow.
Northern Powergrid	Yes P300 will impact the following systems which will require significant changes: • DUoS billing system; • MPRS system; • File processing system which controls the transfer of data between internal systems. Minor changes may be needed to other systems but these are likely to be minimal, although a full impact assessment will be required. Minor changes will be required to internal documentation.

Respondent	Response
	The following process would need to change: • We will need to amend processes to increase our monitoring of the change of measurement class process to ensure that customers are being assigned the correct measurement class by suppliers; • Under the proposed solution, a process would need to be instigated to produce and validate an accurate mapping table for each LLF to SSC and TPR combinations; • Our process for assigning LLFs to new customers will also require minor amendment.
Salient Systems Limited	Yes Salient Systems (SSL) will be required to deliver all necessary functional complements and refinements implicated by P300 to our HHDC/DA/MO system solutions. Our activities will include all Business Process design, build, unit/system testing, regression testing, technical and ops support documentation updates to accommodate P300 implementation. We would also expect to assist our clients at their activities of UAT, BIT and Regression testing activities, performance assurance testing, LWP and operations support procedure mods and systems mobilisation.
GDF SUEZ Energy UK	Yes We anticipate that P300 will have the following impacts: • Our pricing and billing systems will have to be updated to accommodate the changes to DUoS charging implied by the modification. • Our registration and billing systems will have to be updated to cater for the new data flows. • Changes will be needed to our quoting, pricing, sales and billing processes to take in to consideration the new Measurement Classes. We will need enhanced processes and potentially operating capacity to handle increased numbers of Change of Measurement Class (COMC) events both from NHH to HH and within the new measurement classes, particularly if P272 is also agreed.
IMServ Europe Ltd	Yes **Proposed Solution:** • Change to HHDA Systems to enable sending/receiving of amended flows • Change to HHDC Systems to enable sending/receiving of

Respondent	Response
	amended flows • Change to HHMO Systems to enable sending/receiving of amended flows • Change/Increase to Reporting, Data Handling and Data Services and possible impact on Service Lines • Review of existing commercial arrangements **Alternative Solution:** • Change to HHDA Systems to enable sending/receiving of amended flows. The changes required under this option are significantly greater thereby resulting in increased project effort/timescales to develop and implement the requirements. Furthermore the resource required ongoing, due to additional workload on DA role due to aggregating HH data for Measurement Classes F & G, would be higher than that required for the proposed solution. • Change to HHDC Systems to enable sending/receiving of amended flows • Change to HHMO Systems to enable sending/receiving of amended flows • Change/Increase to Reporting, Data Handling and Data Services and possible impact on Service Lines • Review of existing commercial arrangements • Potential implementation of new commercial arrangements dependant on which Party is deemed appropriate to bear the charges, i.e. Supplier or LDSO (see section 5)
SSEPD	Yes This change would require IT development work to update SMRS's application (MPRS), changes to the DUoS billing system and potentially additional resource if mid-year resubmissions of LLFs is required.
UK Power Networks	Yes For UK Power Networks the proposer's solution would have only a minimal impact, requiring changes primarily to our internal processes. However the alternative solution would require potentially significant changes, to not only processes, but also system changes in order to comply with the revised arrangements.

Question 2: Will your organisation incur any costs in implementing P300?

Responses

Respondent	Response
E.ON	Yes It is difficult to predict accurate costs until the outcome of DCP179 is known and believe that true impact to industry cannot be assessed until P300, DCP179 and P272 can be viewed together. However, we believe that to implement either of the proposed solutions will be costly projects and suggest that our alternative solution set out in Question 4 is considered. We believe this would cost considerably less to implement across the industry as it would minimise change to a few parties.
EDF	The cost of P300 itself would be IT changes to accommodate the new/revised data flows, and changes to processes and supply pricing consequent on new structures and levels of HH DUoS charge arising from DCP179. See answer to Q1 for additional related costs associated with Changes of Measurement Class from NHH to HH or vice versa.
SSE	As noted in question 1, there are a number of high cost system impacts and activities that we will incur through implementing P300. Much of the system changes will be one-off costs; however there will also be ongoing costs. P300 does not yet provide the level of detail required to complete a detailed cost estimation, however early indications confirm a high cost is likely. We do recognise the benefits case for this modification and the costs are justifiable when considered alongside the suite of modifications enabling increased HH settlement. As a Supplier, the cost differential of the proposed and alternative solutions is not significant, however for our Agents we anticipate the proposed solution is less expensive to implement. The risk of pursuing the alternative solution is that Supplier parties may need to meet the higher Agent charges despite the fact the solution does not offer any additional benefits.
Scottish Power	Yes It has not been possible to provide detailed cost information at this time, however indicative costs for the DNO area only have been provided based on a High Level Impact Assessment. Option 1 - £20,000 to £40,000. Option 2 (alternative) in excess of £100,000. The costs arise to provide the changes required as detailed in question 1. 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.

Respondent	Response
SmartestEnergy Limited	Yes Costs for IT system changes for SmartestEnergy 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.
British Gas	Yes It is difficult to estimate the precise costs of implementing P300. Whilst P300 does not mandate the use of the new measurement classes some costs will be incurred in recognising the new measurement classes and for being able to create them in our systems.
Stark Software International Ltd	Yes There would be significant costs associated with both proposals, the alternative being greater for HHDA. In addition to the direct costs are those associated with procedures, training and responding to queries. This could impose direct manpower implications. We see no difference between implementation within or outside releases
TMA Data Management Ltd	Yes 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. The system changes for the alternative would cost slightly more but we believe the alternate would have lower operational costs by making resolving exceptions easier; the data and process is still under the control of the Supplier hub and easier to unpick at the HHDA level than at SVAA. The resolution of exceptions supports better data quality which ultimately supports more efficient and accurate Settlement.
RWE Npower	Yes There will be cost implications but at this stage Npower have not managed to obtain a figure
GTC	Yes It is hard to capture these costs until further work is completed on DCP179. As these changes will need to be considered in tandem to calculate the cost of changes to our billing systems.
Electricity North West	**Impacts of the P300 Proposed Solution:** We envisage the proposed solution having a low to medium impact. These costs are one off costs. There is a negligible business cost in

Respondent	Response
	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 3 month lead time which is closer to the time when such changes can be factored into their processes. **Impacts of the P300 Alternate Solution:** We envisage the proposed solution having a high impact. These costs will be one of costs to automate the receipt of the flows, bill production and the sending of the daily flows. In view of other work within the industry, for example on smart metering, our preference is that the implementation is part of a normal BSC Systems Release.
Western Power Distribution	Yes **MPRS** - This is a relatively minor change to MPRS estimated at around 310K to implement **Durabill** – proposed solution is estimated to cost in region of £50K to implement. Ongoing costs would be in the low £000's. **Durabill** – alternative solution - there is insufficient information contained in the Option 2 to provide an accurate cost for the production of a new billing mechanism based on the receipt of metering data received from the HHDA rather than the SVAA. However based on the anticipated work we estimate implementation costs in excess of £100,000. Ongoing costs would be in the low £000's. There are no great differences in costs dependant on the implementation date.
Northern Powergrid	Yes 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: **DUoS billing system changes:** The cost of amendments to our DUoS billing system will be significantly different for the two options proposed: Option one will cost between £6,000 and £12,000 to implement; Option two will cost in excess of £30,000 to implement, the difference being largely due to the loading of (D0030 and D0314 equivalent) and production of (D0242 and D0315 equivalent) new dataflows. **MPRS system changes:**

Respondent	Response
	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. **Internal data transfer system:** The amendments to dataflows being passed internally will cost around £35,000 in changes to our system for carrying out this data transfer.
Salient Systems Limited	Yes Once-off development and delivery costs – estimate 30/40k, which would be apportioned across our client base as system upgrade cost. Ideally, P300 implementation should align with normal BSC system release schedules in order to minimise our overall costs.
GDF SUEZ Energy UK	Yes The main costs will be incurred in: • Undertaking the necessary changes to our systems as noted in Question 1. • Where necessary reviewing resourcing levels to ensure that increased levels of COMC events can be handled. Communicating and explaining the changes to customers.
IMServ Europe Ltd	**Proposed Solution:** **One off costs:** • Development, testing and deployment of System Changes documented in Question 1 **On-Going Costs:** • Additional Training, production of associated Procedures/LWIs, reporting, support, data storage resources, general resources etc • Additional Auditing/Performance Assurance support • Possible requirement for additional personnel • Additional DTN costs **Other Cost considerations:** • May require additional hardware to support data capture • External Support costs (e.g. licences, communications costs,

Respondent	Response
	Disaster Recovery site etc) **Alternative Solution:** **One off costs:** • Development, testing and deployment of System Changes documented in Question 1 **On-Going Costs:** • Additional Training, production of associated Procedures/LWIs, reporting, support, data storage resources, general resources etc • Additional Auditing/Performance Assurance costs • Likely requirement for additional personnel (please see below) • Additional DTN costs **Other Cost considerations:** • May require additional hardware to support data capture • External Support costs (e.g. licences, communications costs, Disaster Recovery site etc) **Additional Cost over Proposed Solution:** • Increased workload and resources required for HHDA role • Higher probability that additional personnel would be required • The DTN costs would be higher for both solutions than currently but the Alternative Solution DTN costs would be higher than the Proposed Solution DTN costs • The Alternative Solution would also have a higher cost in terms of System Development costs and Project Resource costs due to the increased role of HHDA in this solution i.e. more development and testing etc **BSC Systems Release:** • 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.
SSEPD	Yes This would incur minimal costs.
UK Power Networks	Yes For UK Power Networks the costs will only be minor if the proposer's

Respondent	Response
	solution is taken forward, because as noted for Q1 it will require changes primarily to our internal processes. However if the alternative solution is taken forward then system changes will be necessary which will see significant one off costs incurred.

Question 3: How long (from the point of Ofgem approval) would you need to implement P300?

Responses

Respondent	Response
E.ON	It is changes to our HDC system that will drive how quickly we can deliver the changes required. As we may have to procure a new system, we are nervous that November 2015 could be very tight. We would like to see a minimum of 12 months lead time from the point of Ofgem approval. If our proposed alternative solution outlined in Q4 was to be adopted, it would be straightforward to continue with site specific billing for the new tariff structures while numbers were low. The new measurement classes could be introduced into the existing process; with the final changes in order to support aggregation being implemented at a later date but before numbers become unmanageable for LDSO's.
EDF	As explained above, the implementation of P300 alone may be relatively straightforward. However, a timescale less than 18 months would be very challenging, and shorter timescales are naturally more expensive. We think the timescale needs to factor in the repercussions that P300 could create on numbers of CoMCs, and reflect that in the overall timescale for implementation.
SSE	12 months It is crucial that the sequencing of P300, P272 and DCUSA DCP179 permits sufficient lead-time to complete the significant changes to both our systems and contractual/ customer relationships involved in each of these modifications. Based on the current level of detail, we suggest a lead time of no longer than 12 months is needed to manage this change. With an expected implementation date for P272 in April 2016, we need to first complete and embed P300 to avoid/ reduce overlap in the activities of these two modifications. By increasing the overlap of P300 and P272 we expect implementation to be subject to higher cost and higher risk.
Scottish Power	12 months Given the multiple system changes, some complex, that will be required across various aspects of the organisation it seems sensible to ensure that they will all be ready to be implemented at the same time. In addition given the level of proposed industry change at present it will not be possible to implement this change any sooner than the Nov 15 proposed date. We believe that the industry should not be constrained by normal system release dates and that if given a year's notice then the release could take place outside the normal cycle. From the DNO DUoS perspective, we believe the lead time for Option 1 is around 8-12 weeks and at least 12 months for Option 2. Both of these lead times assume a starting point after the end of

Respondent	Response
	2014.
SmartestEnergy Limited	6 months
British Gas	Bearing in mind P300 is merely introducing the new measurement classes and does not mandate the use of them we would need a minimum of 6 months lead time from the date of Ofgem approval.
Stark Software International Ltd	Around 9 months Although the alternative option is more complex both solutions should be possible with 9 months. Time frames are driven by other pressures on a limited resource for a change that produces no benefit to HHDC/DA
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. The lead time for the alternate would be the same.
RWE Npower	1 year min Npower believe the proposed lead time of 12 months is adequate and the solution seems like the most pragmatic approach to remove the barrier of excessive DuOS charges from the path of MOD P272
GTC	This is to ensure that there is sufficient development time for any changes to systems and processes. We expect that there will be extensive system changes as result of this change.
Electricity North West	We believe we need twelve months from the Ofgem approval to implement this Modification. This is based on the assumption that DCP179 is approved at the same time. We believe that the proposed solution will have a shorter delivery timetable but because we want to align with the BSC Systems Release timetable we see little benefit in attempting to deliver to an earlier date due to other changes within the industry associated with the smart meter roll out and the smart markets initiatives that is placing significant pressure on IT resources over this period. We would suggest that Ofgem also need to consider aligning the P272 implementation date or making it later than P300. Should this be earlier we are likely to be impacted for the period between the two dates which may result in costs to update a system (that could be avoided) and a consequential delay to the implementation of this Modification together with a further migration of some of the customers to the aggregated tariff once P300 is implemented. We indicated in 2011 that the impact of implementing P272 were: • An increase from 6,000 HH customers to 22,000 HH Customers (Currently 16,000 NHH customers on profiles 5-

Respondent	Response
	8); • An increase in the volume of daily HH data for the extra 16,000 sites; • The processing of the extra data and table space required to hold this data; and • This would be a large change. We now have 9,000 HH site specific customers and 13,600 NHH customers on PC5-8 If at the same time or later than P300 this may reduce the above impact because only 54% of the NHH customers on PC5-8 will require HH site specific billing with the other 46% being billed on the aggregated HH tariff.
Western Power Distribution	6 – 12 months We estimate a minimum 6 months lead time for proposed solution and a minimum 12 months for the alternate solution, the latter requiring confirmation if and when more details of the alternate solution are provided.
Northern Powergrid	18 months Our required lead time of 18 months is primarily driven by the need for system changes and the time associated with specifying, designing and testing these changes prior to going live with the new measurement classes. Along with the increased cost, the lead time would also be increased if P300 were implemented outside of a normal BSC release.
Salient Systems Limited	3 months Minimum of 3 months required for SSL to complete our activities. System changes are non-complex, testing related activities are key. Anticipated that metering agent client(s) would require period of 3 to 4 months, starting towards end of SSL delivery plan, to complete client side UAT, BIT, Regression testing etc leading to go-live.
GDF SUEZ Energy UK	Yes The key driver behind the stated lead time is completing the required upgrades to systems. This timescale would not be materially impacted whether or not the implementation was part of a normal BSC systems release. We do not see any difference in lead time between P300 and P300 Alternative.
IMServ Europe Ltd	Until more detailed information is available we can only give an approximation - 18 months

Respondent	Response
	Proposed Solution: • Dependent on role from longest lead time (HHDA role) to shortest lead time (HHMO role) • Largest impact on lead time will be developing, testing and deploying the system changes for HHDA, followed by system changes to HHDC followed by System changes to HHMO. • Once system changes deployed, training would follow a similar lead time pattern. **Alternative Solution:** • As above but lead times for HHDA would be increased due to additional elements involved in the HHDA role under the Alternative solution i.e. increase in duties such as aggregation of HH Data for Measurement Classes F & G • Additional reporting to be developed, tested and deployed. **Caveats applicable to both proposed solutions:** • Difficult to quantify the appropriate lead times due to the large number of variables. Depends heavily on volume, plus scope of activities (e.g. whether responsible for both data capture and validation) as this may change the lead time pattern. • Further detail regarding the mechanics of the proposed process are required to enable a more accurate time frame and our estimate reflects this.
	BSC Systems Release: • There would be no difference in terms of time frame whether P300 is implemented as part of or outside of a normal BSC Systems Release providing the Lead Time was adequate.
SSEPD	18 months - We would be able to implement the change at the earliest January 2016.
UK Power Networks	For UK Power Networks we will require a period of time to update internal processes for the proposer's solution, which is likely to be no more than a couple of months. However should the alternative proposal be taken forward then we are likely to require a period of approx. 12 months to scope, test and deploy the changes to our systems.

Question 4: Are there any other possible alternative solutions to P300 that you believe the Workgroup should consider?

Responses

Respondent	Response
E.ON	Yes We believe that the work group should consider the HHDC's continued use of the D0036. The solution would be the same as the proposed solution other than requirement 5. Instead of sending a D0010, the HHDC would continue to send the D0036 as they do currently, this would mean that the LDSO's still receive site specific data, however, the entries for profile classes F and G on the D0036 could be ignored and not processed and the LDSO's could wait for the aggregated data from the D0030. We believe that amending a system to ignore certain entries based on measurement class should be a reasonably small change. The current proposed change requires all HHDC's to make significant changes to incorporate a flow which is not used in the current HH world, as well as changes to HHDA systems to support the use of the D0010. The continued use of the D0036 limits changes required by parties. Ofgem have stated previously that they want all customers to be able to respond to DUoS signals and they would force suppliers if necessary to pass those signals onto the customer. Suppliers will only be able to do this by passing through the actual cost of DUoS to customers which will require them to have site specific data. If this is the case, in the proposed solution, suppliers will opt to receive the D0036 which means any benefit of implementing the D0010 is further eroded.
EDF	Yes Since our primary concern with P300 is the potential effect it could have on HH settlement in PC1-4 (pre-DCC roll-out), we would suggest an alternative solution focussed on PC5-8, with an implementation timescale of no earlier than April 2016. As explained above, P300 is relatively straightforward in itself, but the issues of Change of Measurement Classes between HH and NHH and vice-versa are significant. Ensuring readiness for an interim / transitional arrangement that would incur costs in excess of £5m would be uneconomic. With no identified benefit to EDF Energy or to its customers, a fully scaled solution cannot be justified at this stage.
SSE	No
Scottish Power	Has the Group given consideration to adding in further new measurement class(es). We ask his question because we believe that Non-Domestic CT customers should be allowed to be continued to be billed under the more efficient existing Supercustomer methodology (i.e. via aggregated consumption). The current P300

Respondent	Response
	solution as it stands will effectively mandate that they must go HH, which does not meet its underlying purpose, which is to provide these customers with a tariff 'equivalent' to HH. 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. ***Condition 47: Smart Metering – Matters Relating To Obtaining and Using Consumption Data Application*** *47.2 Part B of this condition applies only in respect of each Designated Premises at which the Customer is a Micro Business Consumer (the micro business premises):* *(a) to which electricity is supplied through an Electricity Meter which forms part of a Smart Metering System; or* *(b) to which electricity is supplied through a Remote Access Meter; and* *(c) in respect of which the quantity of electricity supplied is measured by that Electricity Meter.* ***PART B. MICRO BUSINESS PREMISES*** ***Prohibition on obtaining consumption data*** *47.16 Subject to paragraph 47.17, the licensee must not, in respect of any micro business premises, obtain any Electricity Consumption Data which relates to a period of less than one month.* ***Exception to prohibition on obtaining consumption data*** *47.17 Paragraph 47.16 does not apply where: (a) the licensee has given at least seven days advance Notice to the Micro Business Consumer at the micro business premises informing the Micro Business Consumer:* *(i) that the licensee intends to obtain Electricity Consumption Data which relates to any one or more periods of less than one month;* *(ii) of the purposes for which the licensee may use that Electricity Consumption Data; and* *(iii) that the Micro Business Consumer may at any time object to the licensee obtaining that Electricity Consumption Data and of the process by which he may do so; and* *(b) the Micro Business Consumer has not objected to the licensee obtaining that Electricity Consumption Data for the purposes set out*

Respondent	Response
	in the Notice.
SmartestEnergy Limited	No
British Gas	Yes As stated in our response to question 1 we would suggest an alternative solution whereby the settlement performance for measurement class F and G is reduced to 90% and following review of actual performance is increased on a phased implementation basis.
Stark Software International Ltd	Yes P300 benefits LDSOs and they should have the incentive to deliver flows to Suppliers to allow Aggregated DuoS billing. Alternatively, rather than the work being repeated across all DC/DA with the risk of one or more failing to deliver accurately and on time, a single centralised version at SVAA would produce the same benefits with lower cost and risk.
TMA Data Management Ltd	No
RWE Npower	No
GTC	No
Electricity North West	No
Western Power Distribution	No
Northern Powergrid	Yes Under the proposed solution, we are concerned about the process by which LDSOs would inform SVAA of the LLFs which map to combinations of SSC and TPR. The process of producing mapping tables by LDSOs, for these to be emailed and processed by the SVAA into their systems allows too much potential for manual errors to occur. We would like the Workgroup to consider instigating a process whereby the LDSO updates MDD with this information in line with the current process, with the SVAA taking this information directly from MDD into their systems.
Salient Systems Limited	-
GDF SUEZ Energy UK	No
IMServ Europe Ltd	Yes

Respondent	Response
	• LDSOs to make changes to their systems which would remove the need for changes across the rest of the industry. • Consider centralising the changes within SVAA – i.e. one single, central change rather than a number of changes across a range of systems and Agents.
SSEPD	No
UK Power Networks	No

Question 5: Would you like to make any further comments on P300?

Responses

Respondent	Response
E.ON	As stated in our response to Q2, it is hard to assess fully the impact of P300 without considering DCP179 (due out for consultation w/c 26th ay 2014). P300 facilitates a sensible way of producing aggregated HH billing although full cost to industry is unclear P300 and probably won't be known until both changes are assessed together.
EDF	Yes We understand that P300 is only an enabler of HH settlement and does not mandate Suppliers to settle half-hourly. However, if P272 is approved, there will be a requirement to migrate PC5–8 Metering Systems to HH. We are broadly supportive of PC5-8 becoming HH from April - June 2016 where it has been possible to install an Advanced Meter (AMR) and establish remote communication, but implementation challenges still apply. P300 Requirement 2 states that the BSC would be modified to set a Performance Level for Measurement Classes E, F and G (all sub-100kW HH) to settle 99% of energy on actual data at R1. Unless the measurement classes only include AMR with a fully operating communication link, the performance would be difficult and expensive to achieve. This is because we would have to send a meter reader at least monthly to obtain a meter read. This would incur additional costs and does not guarantee a read where access is an issue. Clear guidelines on what happens to those P5-8 sites which either are not AMR by the time P272 is implemented; or are AMR meters without working remote communications would be useful.
SSE	Yes We would welcome further consideration being given to the transition arrangements that should be undertaken. As referenced in our answer to question 1, a number of the activities cannot be completed with a big bang approach. We welcome the views of Elexon and the P300 working group on how this will be managed. The progression of P300 must undergo rigorous impact assessment to ensure the right outcome is reached. The scale and pace of current industry change is increasing and with this comes the risk that solutions are not fully assessed. The changes being made should be have a longevity that justifies the costs being spent.
Scottish Power	We would take this opportunity to comment on the Alternative Solution, which while not directly referred to in this paper, has such significant impact that it would be wrong to ignore. In addition to

Respondent	Response
	the comments provided above we would add the following: Option 1 follows the existing working processes, which are generally successfully managed throughout the Industry. Option 2 requires significant additional process change across the full cycle of settlement data submission, DUOS billing processing and Supplier validation and account payment. This increases the work load for all participants, while at the same time giving concern that the overall SVAA settlement process will be compromised (i.e. there is no detail provided as to how the existing SVAA process will be managed as a result of separation of Aggregated Volumes between SVAA and HHDAs – e.g. GCF calculations etc.). The DNO costs and timescales for implementing Option 2 are also far greater, as described in Q2 & Q3 above. Some examples of the additional process activities would include: Design and implementation of 2 new data flows for each HHDA use (equivalent to D0030 & D0314), sending and receiving of multiple copies of these flows between HHDAs and DNOs, DNO's loading and validating of the 2 new data flows, creation of new data structures to hold the metering data against, creation and allocation of new Tariff structures to be used in the HHDA Billing, creation of a new daily HHDA Billing process, creation and generation of 2 new data output flows (equivalent to the existing D0242 and D0315), creation of a new daily HHDA invoice process and invoice formats and creation of new control reports and interfaces to existing accounting systems. The main reason that Option 2 has much more of an impact is that in addition to the flows currently produced via SVAA, DNO's will be receiving one flow per HHDA, per distributor for each settlement date and run type, rather than just one flow per distributor (again there is no detailed information as how these will be validated in accordance with existing SVAA controls, if at all). Based on the above, SP strongly suggest that Option 2 is rejected, and that only Option 1, if any is recommended for approval.
SmartestEnergy Limited	No
British Gas	Yes We are currently still seeing significant interoperability issues in the existing PC 5-8 market. We believe these need to be resolved before we are mandated to use the new measurement classes created by P300.
Stark Software International Ltd	Yes If not centralised into SVAA or devolved across LDSO, costs for the work for HHDC/DA should be funded or at least subsidised

Respondent	Response
	centrally. There are areas that are unclear in the proposal. How is the DC to provide D0010s that reflect Duos without the equivalent of a D0313/D0149/D0150? Saying that the supplier should provide the registers and the appropriate times sounds insufficiently robust. Collection of Duos registers and the sending of a D0010 is significantly different and more complex than provision of HH data due to meter type and programming variations and is potentially a major issue.
TMA Data Management Ltd	Yes • We don't believe there is any need to add "Distribution Id" and "Line Loss Factor Class Id" to the existing ASL and ABL groups in the D0040/D0298 flows • Should the YYY group contain Aggregated Supplier Line Loss instead of Aggregated Supplier Consumption? • As an HHDC we remotely retrieve meter readings and interval data for the channels on the meter, we have assessed the impact under the assumption that we are to just send these collected meter readings to the Distributor and or Supplier in the D0010 flow. The HHDC makes no distinction between the different registers e.g. day/night, and does not receive the D0149 that informs the NHHDC of how these registers are set up. The only current method for an HHDC to know the measurement class of a site is via the D0289 flow. Sending of this flow would need to be made mandatory to ensure that HHDC's always know a sites measurement class.
RWE Npower	No
GTC	Yes Will it be necessary to create new LLFC's to facilitate this process? We are concerned as ever about the number of available LLFC's and the necessity to create new ones. Is there a technical reason why the LLFC's already created and used by distribution companies cannot be used under this process? If new LLFC's are required we are concerned that some distribution parties will not have enough LLFC's to fulfil the requirements of the CP. Consideration then would need to be given under a separate change to review the LLFC coding which would require further systems changes.
Electricity North West	On the alternative proposal our assumption is that we would bill on receipt of data from the HHDA for each supplier in question. We would not want to aggregate up a supplier bill if they chose to have different HHDAs. This ties it back to the data both parties receive rather than both parties aggregating so that the bill can be

Respondent	Response
	produced by party A and validated by party B. We don't know whether suppliers have more than one HHDA but we are aware of such a practice with Mops. If the intent is for suppliers to have one bill due to the above being an issue then additional costs will be incurred. Whilst we recognise that the "purist" view may well be the alternative proposal we believe that the least impact on our company will be the proposed solution.
Western Power Distribution	We believe the proposed solution is the preferred option to facilitate DCP 179 and P272, there are no new data flows required, and therefore implementation may be achieved earlier. Although we would make the following comments :- Requirement 4 - states LDSO will provide relevant LLFC /SSC & TPR for M/C F & G and a default SSC for any unexpected LLF – however billing hinges off LLFC and therefore if the LLFC included in the D0030 relates to an LLF not associated with M/C F & G, then it will bill against the tariff for that LLF NHHDA's do not aggregate de-energised sites – however we do receive D0036 data for de-energised HH mpans, what will the HHDA do as under CDCM we are unable to bill HH de-energised mpans, therefore the data should not be included within the D0030/D0314 or the alternative Dxxx or Dyyy The alternative solution – is overly complicated and involves new data flows and high levels of changes to billing systems, it also introduces extra validation to ensure settlement data is received prior to billing. P/C 0 - Point 4.7 of the IA states that 'PC '0' and any related data will not be added into MDD, which is consistent with current practice.' After discussing this with a member of the P300 working group it appears that there is an option is to add PC '0' to MDD. If this approach is adopted there will be resultant minimal changes to MPRS although confirmation should be sought that Suppliers would expect Profile Class '0' in the existing flows. **D0036/D0275 Precision of Metering Data** St Clements has raised the issue as to whether the HH Metering data flows D0036/D0275 will be amended to reflect the metering voltages of sites operating below the 100kW level with the P300 working group. St Clements understands this will be raised as a separate DTC change and any impact on Durabill will be performed when this is issued.
Northern Powergrid	-
Salient Systems	-

Respondent	Response
Limited	
GDF SUEZ Energy UK	Yes There needs to be consideration of how mandatory movement from the new Measurement Classes to Measurement Class C will be reported on and enforced (An update to the SP04 process).
IMServ Europe Ltd	Yes The consultation provides a high level description of two approaches but lacks the detail to allow us to respond more fully – responses are therefore indicative only. We have listed below those areas on which we would require more clarity in order to provide this, along with some general points for consideration: **Commercial Considerations:** • The current proposals obligate the Suppliers to provide this service through its appointed agents (e.g. HHDA, HHDC and HHMO) via inclusion in the BSC. These Agents would incur a cost and would likely seek to charge these costs to the Supplier, however the main beneficiary appears to be the Distribution Business. It is not apparent at this stage as to whether this has been considered and how Suppliers view this matter. This aspect could impact implementation timescales. An alternative to be considered is that the beneficiary of this proposal, i.e. Distribution Businesses, should be charged for the service rather than the Suppliers. **Deployment Strategy:** • Will this be a Big Bang Deployment i.e. all steps taken to hit a target date or a Phased Deployment i.e. done in several stages? How will this be co-ordinated and controlled and by whom? • How will existing Measurement Class E sites be handled? Will these all be re-registered/re-categorised into the new Measurement Classes i.e. either the New Measurement Class E, F or G. How will this Data Cleansing project be managed? • ECOES – will changes need to be made to ECOES to handle the new Measurement Classes? **Process:** **HHDC:** • Will the HHDC be informed by the Supplier of the Measurement Class via the D289 flow? • How will the DC know to (optionally) send D10 to the Supplier? Contract ref on the D155?

Respondent	Response
	• How will the HHDC reconcile MPANs where the Supplier has requested the optional D10 via the D155 that are not in the D209? Some kind of exception / manual fix? • How will the Supplier communicate the number of registers and associated times? **HHDA:** • Will the HHDA be informed of the Measurement Class via the D209 flow from MPAS? • The HHDA needs to know the Supplier Id, GSP Group and CCC Id. Will these all be sourced from the D209, since they all exist within this flow?
SSEPD	No
UK Power Networks	Yes Should the proposers solution be taken forward, then the SSCs used so that the DNO receives the data split by their own time bands (Red / Amber / Green or Yellow / Black / Green) would need to be non MDD values (so that the DNO can submit and update the times associated with them). At present the SSC is a Supplier defined data item in MDD. Alternatively a separate change would be required to allow Elexon to revise SSC values in MDD on the DNOs' behalf.