

Change Proposal Circular – CPC00740 Responses

CPC00740: Impact Assessment of CP1411

Summary of Responses for CP1411

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
British Gas	Yes	No	N/A	Yes
EDF Energy	Yes	Yes	Unknown	No
E.ON	Yes	Yes	Yes	Yes
IMServ Europe Limited	Yes	Yes	Yes	Yes
Opus Energy	No	Yes	Yes	No
RWE npower	Neutral	No	N/A	Neutral
ScottishPower	No	Yes	Unknown	Yes
Siemens Operational Services	Neutral	Yes	Unknown	No
SSE Energy Supply Ltd	Yes	Yes	None	Yes
SSEPD	Neutral	No	None	Neutral
TMA Data Management Ltd	Yes	Yes	Yes	Yes

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Organisation	Responses/Comments
British Gas	<p>Agree with the implementation approach? – Yes</p> <p>Any other comments? No comments.</p>
EDF Energy	<p>How is your organisation impacted? – Possible system and process changes.</p> <p>What are the associated costs on your organisation to implement the change? – Costs have not been determined for this proposal.</p> <p>Agree with the implementation approach? If not, why? – No, with other industry changes already approved for implementation at this time we would prefer a date of February 2015.</p> <p>Any other comments? We conditionally agree dependent on:</p> <ul style="list-style-type: none"> • A sufficient implementation timescale is needed for MOP to perform these tests; to test 8300 meters in a year would take some 700 tests per month. • Meters changing to HH will generally be the same ones already installed and commissioned; given nothing will physically change and we are satisfied with existing arrangements, can we justify this change? In short, will proving tests provide a quantifiable improvement in data quality? • Assurance is needed that only meters that can be read remotely would be included. At present we hold some 1300 de-energized meters and 1200 meter without operational communications in this category. Otherwise it may not be possible to fulfil this change. <p>We would need clarification on if existing CoP10 metering is to be included, as this is not clear in the proposal.</p>
E.ON	<p>How is your organisation impacted? – MOP.</p>

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	<p>What are the associated costs on your organisation to implement the change? – We consider this to be ‘small change’.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? We are supportive of this. Proving Tests have unearthed discrepancies that commissioning fails to do so can only add to the element of security that a newly installed/commissioned meter is set up correctly.</p>
IMServ Europe Limited	<p>How is your organisation impacted? – As a MOP we would be responsible for ensuring the PT was completed, and within the required timescales and as a DC we would undertake the Proving Test.</p> <p>What are the associated costs on your organisation to implement the change? – Minimal.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? No comments.</p>
Opus Energy	<p>How is your organisation impacted? – Significant costs associated with proving tests for CoP10 Profile Class 5-8 Metering Systems being settled HH.</p> <p>What are the associated costs on your organisation to implement the change? – If CP1411 reverses the exemption in CP1261, which was introduced to remove a barrier to elective HH Settlement for below 100kW sites, there will be significant cost impacts for suppliers. The estimated cost of a proving test, as obtained from a MOP agent, is circa £30/test. These costs will be incurred for initial proving tests together with any subsequent proving tests that may be required when, for example, if there is a change of agent.</p> <p>We have estimated the cost impact to our organisation at several hundred thousand pounds. On this basis, the impact across the industry would be significant.</p>

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	<p>Agree with the implementation approach? – No. Given that the implementation date for P272 has been delayed and is still not finalised, we believe that the implementation date for CP1411 should be aligned with P272. This is supported by the fact that, under CP1261, proving tests are not mandated for elective HH, because they are seen as a potential barrier to HH Settlement.</p> <p>Any other comments? We do not agree with the change. Although it is understood that the main driver for the change is Settlement accuracy and that the CoP10 exemption from proving tests that was introduced under CP1261 for elective HH Settlement for below 100kW sites changes to some extent with P272 implementation (if approved), the change proposal has significant cost impacts. Because these costs ultimately impact customers and the pressure there is to limit such costs, we would recommend that further analysis is carried out to fully understand the cost impacts of not mandating proving tests vs the costs of applying proving tests as proposed, and that any potential alternative options that may have been proposed in consultation responses are fully explored.</p> <p>In line with above, has analysis been carried out regarding the expected risk to Settlement, considered against any potential alternatives and cost impacts?</p>
RWE npower	<p>Agree with the implementation approach? – Neutral</p> <p>Any other comments? Npower don't see how NHHMOA's are impacted by this change as suggested in the 'Potential participant impacts and costs' section. Although npower have no objection to this change but it is worth noting that removing the exemption would add a significant volume of additional proving tests to the workload of the HHMOA and HHDC during the time that the P272 CoMC process is underway, assuming that these metering systems require proving on moving to HH.</p>
ScottishPower	<p>How is your organisation impacted? – This will require a significant change for NHHMOAs and their IT systems.</p> <p>What are the associated costs on your organisation to implement the change? – No comment.</p>

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	<p>Agree with the implementation approach? – Yes, while a November 2014 date is possible for CP1411, given its relationship with CP 1409 and CP 1410, it may be worth considering delaying its implementation so as to implement all three changes together.</p> <p>Any other comments? We do not agree with the change, because we believe the existing AMR portfolio should remain exempt as any metering faults should have been rectified and that the COMC should not in itself require a proving test. We believe that going forward only new COP10 meters installed as HH should undergo proving tests.</p> <p>Change should not be retrospective and should only apply for new meters that are installed after this change goes live.</p>
Siemens Operational Services	<p>How is your organisation impacted? – Unclear; due to lack of clarity of the scope of the CP’s requirements.</p> <p>What are the associated costs on your organisation to implement the change? – This will depend on whether all existing Cop10 have to have proving tests. From the Change Proposal it is unclear which set of Cop10 meters are being referred to (new or existing).</p> <p>Agree with the implementation approach? If not, why? – No. We don’t believe that an implementation of November 2014 is practical, plus we don’t understand the urgency as this CP is to support Modification P272 which has already been pushed back to an earliest implementation of April 2016. Therefore we would suggest that the opportunity and time this Change Proposal to be reviewed, clarified and amended as necessary.</p> <p>Any other comments? Does the requirement for proving tests only apply to newly installed meters, or does it apply to existing meters as well?</p> <p>If it the second option:</p> <ul style="list-style-type: none"> - Over what timescale would this work need to be completed? - Would the proving tests of existing meters have to be completed before the implementation of the CP for new installations?

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	Depending on the answers to the above questions will determine a date which we would be in a position to implement the Change.
SSE Energy Supply Ltd	<p>How is your organisation impacted? – Minimally.</p> <p>What are the associated costs on your organisation to implement the change? – None.</p> <p>Agree with the implementation approach? If not, why? – Yes</p> <p>Any other comments? We are supportive of this change. Firstly, we understand this is already a requirement under BSCP514 and so it is logical to make the same change in this document. Secondly, it will give Suppliers and HHDCs the confidence that the data being retrieved from the meter is correct. Beyond supporting the accuracy of customer billing it is also important for the integrity and accuracy of the data entering Settlements.</p>
SSEPD	<p>Agree with the implementation approach? – Neutral</p> <p>Any other comments? No comments.</p>
TMA Data Management Ltd	<p>How is your organisation impacted? – system</p> <p>What are the associated costs on your organisation to implement the change? – Low cost.</p> <p>Agree with the implementation approach? If not, why? – Yes</p> <p>Any other comments? No comments.</p>

No comments were received on the redlined text for CP1411.