CP1432 'HH Default EAC by Measurement Class'

This CP Consultation was issued on 9 March 2015 as part of CPC00754, with responses invited by 2 April 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
IMServ Europe	0/3	HHDA, HHDC, HHMOA
ScottishPower	5/13	Distributor, Generator, Supplier, Supplier Agents
Electricity North West Ltd	1/0	Distribution
SSE Energy Supply Limited	4/6	Supplier, NHHDC, NHHDA, NHHMOA
British Gas	5/0	Supplier
RWE npower ltd	7/14	Generator, Supplier, Supplier Agent
UK Power Networks	3/0	Distributor
Stark Software International Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
EDF Energy	5/14	Generator, Supplier, Consolidator, ECVNA, MVRNA, CVA MOA, HHDA, HHDC, HHMOA, NHHDA, NHHDC and NHHMOA

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓*	✓	✓	✓
IMServ Europe	✓	✓	✓	✓
ScottishPower	✓	✓	✓	✓
Electricity North West Ltd	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✓	✓
British Gas	✓	✓	-	✓
RWE npower ltd	✓	✓	✓	✓
UK Power Networks	✓	✗	✗	✓
Stark Software International Ltd	✓	✓	✓	✓
EDF Energy	✓	✓	✓	✓

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Question 1: Do you agree with the CP1432 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	In principle	We agree in principle. We would like to understand the rationale behind the values proposed. The average (across GSP groups) of the default EACs used in NHH settlement, effective from 01/04/2015 are as follow PC 5 65040.2 KWH PC6 93700.6 KWH PC7 119598.6 KWH PC8 154152.2 KWH The proposed values for Measurement Class E, F and G are as follow, also in KWH: E 50000.0 F 7000.0 G 30000.0 We understand that there is no direct link between PC and MC however the proposed values at MC level are lower than all the current average values at PC level. The spirit of the default EAC is to be punitive to ensure that all steps are taken by Suppliers and their Agents to avoid its use in Settlement. We are concerned that the proposed values for MC E, F and G do not offer that deterring effect and are therefore moving away from the original intention of default EACs.
IMServ Europe	Yes	-
ScottishPower	Yes	ScottishPower recognise that the current HH Default EACs might not be suitable or reflective of consumption at sites within the new Measurement

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Respondent	Response	Rationale
		classes adopted after the implementation of P300.
Electricity North West Ltd	Yes	We agree with the proposed solution. We see this as a housekeeping change as the HH Default EAC is distributed independently of the MDD data flows. We don't expect to see any impact.
SSE Energy Supply Limited	Yes	We are fully supportive of Measurement Class C, E, F and G each being allocated their own Default EACs. The variation between the supplies across the new Measurement Classes should be reflected in the Default EACs to ensure the Default EACs is bears an appropriate and proportional relationship with the Measurement Class and Metering System on site.
British Gas	Yes	-
RWE npower ltd	Yes	-
UK Power Networks	Yes	This change is required to maintain accurate EACs following the implementation of P272.
Stark Software International Ltd	Yes	-
EDF Energy	Yes	In principle we believe there should be separate HH Default EACs for different Measurement Classes.

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Question 2: Do you agree that the draft redlining delivers the CP1432 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes but not the proposed values.	As listed in our response to question 1, we do not see the proposed values to be in line with the current default EAC value used.
IMServ Europe	Yes	-
ScottishPower	Yes	-
Electricity North West Ltd	Yes	We agree with the draft redlining.
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
UK Power Networks	Yes	-
Stark Software International Ltd	Yes	-
EDF Energy	Yes	

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Question 3: Will CP1432 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Our systems and procedures would be impacted. We are impacted as HHDC and HHDA.
IMServ Europe	Yes	-
ScottishPower	Yes	As a Distributor we will be required to implement consequential System changes, as a result of Implementation of P300, to allow processing of the required changes to the D0269 and D0270 Flows. There will also be a requirement to update internal documentation to reflect the change. We do not anticipate this to be a major change. As a Supplier we will have to update our HH validation system to they are able to store the new HH Default EACs once included in the MDD.
Electricity North West Ltd	No	-
SSE Energy Supply Limited	Yes	As a Supplier the impacts will be minimal.
British Gas	Yes	We anticipate low impact system changes will be required
RWE npower ltd	Yes	System and Process changes will be required but is industry wide and not specific to RWE npower.
UK Power Networks	No	-
Stark Software International Ltd	Yes	Code changes to both HHDC and HHDA systems to accommodate multiple values of Default EAC.
EDF Energy	Yes	We expect a relatively small change to accommodate measurement class specific HH Default EACs.

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Question 4: Will your organisation incur any costs in implementing CP1432?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The costs that would be incurred if CP1432 was implemented would be medium to high.
IMServ Europe	Yes	There will be a one off development cost on our HHDC and HHDA systems to support this change of around 15 days. Again, given the short timescales between these CPs being approved and the proposed implementation date, we have carried out a detailed analysis of the impact on our HHDC/DA activities in order to be confident the above estimate is accurate.
ScottishPower	Yes	As a Distributor there will be costs incurred in the delivery of the solution to accommodate changes to the D0269 and D0270 Flows, however at this stage we are unsure what they will be. As a Supplier, initial impact assessments have indicated we will incur costs of around £5000.
Electricity North West Ltd	No	-
SSE Energy Supply Limited	Yes	As a Supplier the costs will be low.
British Gas	-	-
RWE npower ltd	Yes	One-off system change costs.
UK Power Networks	No	-
Stark Software International Ltd	Yes	Approx 5 Man days. One-off cost.
EDF Energy	Yes	We are unable to provide details of costs at this stage but they would be one-off.

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Question 5: Do you agree with the proposed implementation approach for CP1432?

Summary

Yes	No	Neutral/No Comment	Other
10	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The implementation of CP1432 must be in line with the implementation of P300.
IMServ Europe	Yes	
ScottishPower	Yes	We agree with the timescales and believe that this is the best solution to align with P300 and the introduction of the additional 'F' and 'G' categories for P272. We believe that should this timescale not be met then this would have a detrimental effect on the accuracy of data in the market.
Electricity North West Ltd	Yes	We agree with the proposed implementation approach for CP1432
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
UK Power Networks	Yes	-
Stark Software International Ltd	Yes	-
EDF Energy	Yes	-

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Question 6: Do you have any further comments on CP1432?

Summary

Yes	No
4	6

Responses

Respondent	Response	Comments
TMA Data Management Ltd	Yes	We have listed this observation in the red lined text section as well. The current HH default EAC as provided in the latest P0186001 is 1500.00 MWH, the value listed in the red lined text is 750000.00 KWH for Measurement Class C. There is another entry effective form 02/04/2000 set to 750001.0 which looks to be an erroneous entry and should be removed if it is confirmed as erroneous. We require clarification on the correct values.
IMServ Europe	Yes	Just a housekeeping comment – Why in the MDD Entity 59 table are there two rows for Measurement Class C, with different HH default EACs and both with Effective Start Dates and no Effective End Dates on either
ScottishPower	Yes	This change proposes to change from one default EAC value applied to one that is measurement class specific. The issue here is you would need to know what the measurement class is in order to assign a default EAC value and the measurement class is communicated to the HHDC via D0289 flow and which we don't always receive in a timely manner (HHDA D0209). Therefore how would we assign a HHDC default EAC if we do not have the measurement class or will this all be completed via the HHDA EAC?
Electricity North West Ltd	No	-
SSE Energy Supply Limited	No	-
British Gas	No	-
RWE npower ltd	No	-
UK Power Networks	No	-

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Respondent	Response	Comments
Stark Software International Ltd	No	-
EDF Energy	Yes	We would like to understand whether the analysis being conducted by Elexon has considered whether there is material difference geographically that would necessitate GSP Group specific HH Default EACs similar to NHH market.

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BSCP509 Appendix 1

Respondent	Location	Comment
TMA Data Management Ltd	MC C	The default EAC effective from date 01/04/2000 is set at 750000.00, the default EAC effective from 02/04/2000 is set at 750001.0. From the latest MDD P0186001 the value is 1500 MWH.

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