CP1434 'Amend the three digit numeric Line Loss Factor Class (LLFC) Id to an alphanumeric LLFC Id'

This Request for Information was issued on 18 May 2015, with responses invited by 29 May 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
ESP Electricity Ltd	1 / 0	Distributor
IMServ Europe	0 / 1	Supplier Agent
Opus Energy Ltd	1 / 0	Supplier
TMA Data Management Ltd	0 / 1	Supplier Agent
Stark Software International Ltd (SSIL)	0 / 1	Supplier Agent
Haven Power Ltd	1 / 0	Supplier
Siemens Operational Services	0 / 1	Supplier Agent
Western Power Distribution	4 / 0	Distributor
Scottish and Southern Energy Power Distribution	2 / 0	Distributor
Electricity North West Limited	1 / 0	Distributor
GTC	1 / 0	Distributor
GDF SUEZ Energy UK	1 / 0	Supplier
Npower ltd	9 / 0	Generator, Supplier, Supplier Agent
British Gas	1 / 0	Supplier
SmartestEnergy	1 / 0	Supplier
UK Power Networks	1 / 0	Distributor
Northern Powergrid	1 / 0	Distributor

© ELEXON Limited 2015

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Salient Systems Limited	0 / 1	Supplier Agent System Software Provider
SSE Energy Supply Limited	1 / 0	Supplier
IBM on behalf of ScottishPower	2 / 0	Distributor
ScottishPower	1 / 0	Supplier, Supplier Agent
EDF Energy	10 / 0	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator
E.ON Energy Solutions Limited	1 / 0	Supplier

© ELEXON Limited 2015

Question 1: When do you expect to run out of LLFCs under the existing limit?

This question was targeted at Distribution System Operator respondents only.

Responses

Respondent	Response
ESP Electricity Ltd	As an IDNO, we have 999 LLFCs to use across all 14 x GSPs. If we were to publish a LLFC for all boundary levels in all GSPs for all CDCM tariffs, we would need 24 CDCM tariffs x by 7 boundary levels x 14 GSPs. A total of 2352 LLFCs, and hence we have already run out.
IMServ Europe	N/A
Opus Energy Ltd	N/A
TMA Data Management Ltd	N/A
Stark Software International Ltd (SSIL)	N/A
Haven Power Ltd	N/A
Siemens Operational Services	N/A
Western Power Distribution	Barring any unforeseen change in the industry we believe it is unlikely that any of WPD's 4 distribution areas will run out of LLFCs in the foreseeable future.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	We currently have 838 spare LLFC codes, consequently we do not envisage running out for many years.
GTC	Unknown this is dependent on changes within the industry however we are limited to 71 LLFC's per GSP group and we have currently used 37 for each GSP group under the ETCL MPID. This leaves 34 for each GSP remaining
GDF SUEZ Energy UK	N/A
Npower ltd	N/A
British Gas	N/A
SmartestEnergy	N/A

© ELEXON Limited 2015

Respondent	Response
UK Power Networks	We do not expect to run out of LLFCs in the foreseeable future.
Northern Powergrid	We do not envisage this to be an issue for our licence areas, Northern Powergrid (Northeast) limited - NEEB/F and Northern Powergrid (Yorkshire) plc – YELG/M
Salient Systems Limited	N/A
SSE Energy Supply Limited	N/A
IBM on behalf of ScottishPower	At this time we have sufficient LLFC available to utilise and as such we cannot foresee a date when we would run out of LLFC to use. We have currently 50% and 70% of LLFCs available for future use in SPM and SPD respectively
ScottishPower	N/A
EDF Energy	N/A
E.ON Energy Solutions Limited	N/A

© ELEXON Limited 2015

Question 2: Why would you run out of LLFCs?

This question was targeted at Distribution System Operator respondents only.

Responses

Respondent	Response
ESP Electricity Ltd	As an IDNO, we have 999 LLFCs to use across all 14 x GSPs. If we were to publish a LLFC for all boundary levels in all GSPs for all CDCM tariffs, we would need 24 CDCM tariffs x 7 boundary levels x 14 GSPs. A total of 2352 LLFCs.
IMServ Europe	N/A
Opus Energy Ltd	N/A
TMA Data Management Ltd	N/A
Stark Software International Ltd (SSIL)	N/A
Haven Power Ltd	N/A
Siemens Operational Services	N/A
Western Power Distribution	The greatest pressure on LLFC numbers is new Site Specifics
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	We do not believe we will run out of LLFCs.
GTC	They will run out for several reasons: • DNOs use LLFCs to describe/ define their tariffs for NHH customers. For EHV customers DNOs have site specific LAFs. The lowering of the EHV charging tier to include connections at the outgoing 11KV bars from the primary increases the need for LLFCs • LLFCs apply on a per DNO basis. Therefore IDNOs only have on average 71 LLFCs per GSP. Additionally IDNOs connect to DNO networks at different network tiers (voltages) and will connect to end customers at different voltages. The voltage tier that the IDNO connects to the DNO, will in part, (as well as the customer type) determine the use of system charges that the DNO levies on the IDNO. The voltage tier that a customer connects to our network will determine the DUoS charge that we levy to a supplier. The only way to specify these two

© ELEXON Limited 2015

<table>
<tr><th>Respondent</th><th>Response</th></tr>
<tr><td></td><td>characteristics is through the LLFC. See example below
<table>
<tr><td>LLFC Code</td><td>GSP Group</td><td>Connection Tier to DNO</td><td>Connection to customer</td></tr>
<tr><td>100</td><td>A</td><td>LV</td><td>LV</td></tr>
<tr><td>122</td><td>C</td><td>HV</td><td>LV</td></tr>
</table>
As an IDNO our tariff (tariff code) is determined by a combination of the LLFC, SSC and PC

In addition to the above we will need to use LLFCs to define nested networks, generation from demand – and in the future any specific sites subject to smart grid type arrangements
IDNO's and distributors which operate out of area are expected to utilise 999 LLFC's across all 14 GSPs as opposed to 1000 in one GSP.

The above points illustrate that the LLFC is being used for more than its original intended purpose and has been expanded out to parties which have a much more expansive customer base. All of these variables are compounding on a data value which is finite and therefore creating a situation which is unsustainable.</td></tr>
<tr><td>GDF SUEZ Energy UK</td><td>N/A</td></tr>
<tr><td>Npower ltd</td><td>N/A</td></tr>
<tr><td>British Gas</td><td>N/A</td></tr>
<tr><td>SmartestEnergy</td><td>N/A</td></tr>
<tr><td>UK Power Networks</td><td>Under our current business plans we would only run out of LLFCs if there was a significant increase in the number of EHV sites requiring site specific LLFs (however this would need to increase at least five fold from current usage before being an issue).</td></tr>
<tr><td>Northern Powergrid</td><td>The limit is 999 so depending on how many site specific customers each DNO has they will run out at different times. It also reflects how many LLFCs existed historically, and whether or not these have been closed down and are available to be re-used. We believe it is a bigger problem for IDNOs who have to replicate tariffs for all DNO areas.</td></tr>
<tr><td>Salient Systems Limited</td><td>N/A</td></tr>
<tr><td>SSE Energy Supply Limited</td><td>N/A</td></tr>
<tr><td>IBM on behalf of</td><td>N/A</td></tr>
</table>

© ELEXON Limited 2015

Respondent	Response
ScottishPower	
ScottishPower	N/A
EDF Energy	N/A
E.ON Energy Solutions Limited	N/A

© ELEXON Limited 2015

Question 3: What will be the consequences of you running out of LLFCs?

This question was targeted at Distribution System Operator respondents only.

Responses

Respondent	Response
ESP Electricity Ltd	Running out of LLFCs will mean the correct settlement combinations will not be used and default tariffs applied as a result. It may also restrict suppliers registering against the MPAN and would therefore affect Settlements. One supplier has to have the LLFC correctly set PRIOR to any registration being attempted so if we are unable to set up the correct LLFC at the outset - it could affect the whole registration process.
IMServ Europe	N/A
Opus Energy Ltd	N/A
TMA Data Management Ltd	N/A
Stark Software International Ltd (SSIL)	N/A
Haven Power Ltd	N/A
Siemens Operational Services	N/A
Western Power Distribution	The main impact of running out would be that we would not be able to allocate LLFCs to new EDCM sites.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	The industry cannot support a situation where LLFC's are no longer available, so alternative options need to be put in place to mitigate this. Additionally, any solution identified should minimise the impact on unaffected parties.
GTC	This would cause significant billing issues both for ourselves and for the distributors who bill us. It would also mean that we could be unable to account for the network losses accurately to Elexon. Any mitigation would be purely dependent on the type of metering point not being correctly accounted for and it would be difficult to say with any certainty if any mitigation could be satisfactorily completed for all parties and for all of our legal responsibilities.
GDF SUEZ Energy UK	N/A

© ELEXON Limited 2015

Respondent	Response
Npower ltd	N/A
British Gas	N/A
SmartestEnergy	N/A
UK Power Networks	We are not at risk of running out of LLFCs, however if we were then it would limit our ability to publish site specific LLFs for EHV premises.
Northern Powergrid	We do not think running out is an option as site-specific billing means what it says, so, if you need to allocate a new site-specific tariff you need to allocate a site-specific LLFC into settlement.
Salient Systems Limited	N/A
SSE Energy Supply Limited	N/A
IBM on behalf of ScottishPower	As stated above, this is currently not an issue for either SP Distribution or SP Manweb, although we do not anticipate that we will run out of LLFCs, our view on the consequences is that the distributor will not be able to assign tariffs if there are insufficient LLFC to underpin them. As detailed in our original response to CP 1434 we believe that an effort should be made to rationalise existing tariffs.
ScottishPower	N/A
EDF Energy	N/A
E.ON Energy Solutions Limited	N/A

© ELEXON Limited 2015

Question 4: Could you mitigate the impact of running out of LLFCs in the short-term?

This question was targeted at Distribution System Operator respondents only.

Responses

Respondent	Response
ESP Electricity Ltd	Currently ESPE has 654 LLFCs recorded in MDD. We have issued HV and LV boundary point of connection (LDNO tariffs) for each GSP reflecting every CDCM tariff plus a small number of HV to HV LLFCs. We have issued a very small number of EHV boundary POC LLFCs and have been very selective of the CDCM tariffs we have applied e.g. mainly 3 CDCM tariffs at EHV boundary connections for each GSP. This is based on the fact that the majority of our networks connections to the DNO are at HV and LV – but EHV connected networks will grow going forward.
IMServ Europe	N/A
Opus Energy Ltd	N/A
TMA Data Management Ltd	N/A
Stark Software International Ltd (SSIL)	N/A
Haven Power Ltd	N/A
Siemens Operational Services	N/A
Western Power Distribution	Yes, as we could allocate generic LLFCs to EDCM sites appropriate at the voltage level. Short term this would be fine as new sites use generic loss adjustment factors until there is sufficient data to calculate site specific factors which requires at least 1 year's data. This would have an impact on settlement as soon as sufficient data becomes available to calculate site specific loss factors as we would not have an LLFC to publish the loss factors against, however it would not affect our ability to bill DUoS.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	Yes because we do not believe we will run out of LLFC's for many years.
GTC	Unknown. It would depend entirely on the circumstances on which we had run out. We may be able to manage in the short term but a realistic long term solution needs to be developed as it will be impossible to predict under what circumstances this might happen.

© ELEXON Limited 2015

Respondent	Response
	As a result it would be unreasonable to expect parties to mitigate these issues without knowing the consequences of taking these actions especially if a long term solution had not been developed or established with a firm implementation date.
GDF SUEZ Energy UK	N/A
Npower ltd	N/A
British Gas	N/A
SmartestEnergy	N/A
UK Power Networks	If the requirements under BSCP128 to publish site specific LLFs were revised and generic LLFs could be applied then that would reduce the volume of LLFCs required. However we are not at any risk in the foreseeable future of running out of LLFCs.
Northern Powergrid	N/a, see question 1.
Salient Systems Limited	N/A
SSE Energy Supply Limited	N/A
IBM on behalf of ScottishPower	We do not have an issue with the availability of LLFCs, and therefore have no requirement to carry out mitigating action. We would suggest that a tariff rationalisation exercise is carried out to mitigate this issue in the short term to allow the development of an enduring solution
ScottishPower	N/A
EDF Energy	N/A
E.ON Energy Solutions Limited	N/A

© ELEXON Limited 2015

Question 5: What impacts would each solution option have on your organisation and what activities would you need to undertake in order to implement that option?

Responses

Respondent	Response
ESP Electricity Ltd	Remaining at 3 integers – we have already run out of LLFCs if we wanted to reflect all the CDCM tariffs. OPTION A - Alphanumeric (3 digits) – if an alpha character MUST be used, that would provide a significant increase in available LLFCs. Assuming the letters can be used in any, or all, of the three character slots, not just the first, by allowing the digits 0-9 and the alphabetical characters A-Z excluding I and O, this gives a possible 34 characters (10 digits and 24 letters) to use in creating an ID. This means that for a three-character ID there are 34*34*34 possible combinations of these characters, giving 39,304 possible combinations. Impact of OPTION A: As a DSO, SMRS and other internal systems will need to be updated and MDD will need reviewing and new combinations added accordingly (substantial administration). OPTION B - Increasing to 4 or 5 digits would alleviate the problem altogether as it increases the available LLFCs to 99,999 (if integer alone). Impact of OPTION B: As a DSO, SMRS and other internal systems will need to be updated and MDD will need reviewing and new combinations added accordingly (substantial administration). OPTION C – This option would require a fundamental change to the way that SMRS processes Distributor data. Such a large change just before the introduction of central registration seems unnecessary. ESPE believe this could create further registration issues for the suppliers in the confusion as to which MPID to use (already we have had problems with some suppliers not understanding that as an IDNO we do not have a DSA) so we can see a lot of confusion on registering against the relevant MPID. Additionally this approach may incur a high level of system changes for all the BSC parties/agents. Impact of OPTION C: As a DSO, SMRS and other internal systems will need significant updates and MDD will need reviewing and new combinations added accordingly (substantial administration).
IMServ Europe	There will be a one off development cost on our HHDC/DA systems whichever option is chosen. Should Option A or B be selected this will consist of an estimated 60 days of effort. This will impact us in multiple ways including the D0040/D0298/D0357 flows and will have audit reporting implications

© ELEXON Limited 2015

Respondent	Response
	as well. This will require a significant amount of testing effort also. In order to come to this view we have carried out a detailed impact assessment on our systems. Option B would have a little less impact on our systems and is our preferred solution. Should Option C be chosen, although we have not yet carried out a detail assessment, this is likely to require significantly greater effort than Options A or B and has a number of potential issues, including -. Using different MPIDs would have a knock on effect in that as HHDC we would be issuing a greater number of dataflows such as the D0036 / 275 to the DNO, since each flow is per MPID. Further, should an MPAN have cause to change their supply arrangements, this could trigger a re-assessment of which MPID it should be associated with, generating even more flows being sent across the DTN as should the change be backdated, revised flows such as D0036s / 275s would be required. We are also unclear how the HHDC would be notified where an MPAN changes from one DNO MPID to another. Other flows including the D0003/10/22 would also be impacted. As far as we understand there is no flow that tells the HHDC which Distribution Id an MPAN is related to. The current method employed is that this is determined based on the first two digits of the MPAN. Should this approach be followed through, where separate MPIDs resulted in different MPAN prefixes, the number of prefixes would quickly be exhausted. The full implications of this approach do need further consideration but this feels more like a 'workaround' rather than a well-considered solution. It is difficult to assess the impact of this option without further detail on how this would be implemented.
Opus Energy Ltd	We acknowledge, because the LLFC code is currently a 3 digit numeric code that as this restricts use to 999 codes (excluding using "000") a solution is required to follow on after 999 has been reached. Our expectation was that once the current 3 digit numeric code has been exhausted at 999, that there would be a logical transition to use of a longer digit numeric code (as shown for Option B of the RFI: Longer integer LLFCs). Our systems are future-proofed and can cope with the move to use of a longer digit numeric code (this would likely be the same for any other organisation whose systems have been set up in a similar fashion) but the original proposed switch to an alphanumeric code (Option B) would incur significant system development costs, which would necessitate a project to change our frontline applications. It is difficult to accurately estimate the impacts for Option C: Multiple Market Participant Identifiers unless further analysis is carried out, but this

© ELEXON Limited 2015

Respondent	Response
	would be expected to be a minimum of 6 months given the expected IT impacts.
TMA Data Management Ltd	Option A and B would have similar impacts in terms of cost, option C is more complex to implement because the distribution short code and MPID unique link would be broken.
Stark Software International Ltd (SSIL)	Impact would mean code amendments to core HHDC system. The amendments are fairly straightforward with the preferred option to simply extend the LLF (integer solution).
Haven Power Ltd	All 3 options would impact our business in terms of cost and resource. Options A & B would require extensive system changes, particularly to our billing system which is not designed to accommodate such changes. We anticipate option B would be the most expensive option as increasing the LLFC to 5 digits would require additional changes to invoices, letters, schedules and other system generated documents. Option C is likely to require fewer system changes, but would have a greater impact on internal maps and processes. There would be a far greater impact on resource for us if this option was implemented.
Siemens Operational Services	As a NHHDA we assume as will be provided with the standard Industry NHHDA software that would incorporate the necessary amendments for the selected option. We expect to incur the cost of undertaking User Acceptance Testing of this release of the software prior to implementation. As NHHDC, HHHDA and HHDC we have to put together a Project plan for the select Option; carry out a full Impact Assessment on our systems and processes to identify the modifications that are required. Then code and test the required systems amendments. Also update any supporting documents. Participate in any Industry Joint Integration Testing.
Western Power Distribution	The main impacts of these changes relate to IT systems. For all options the activities would be largely of the same nature and consist of the following: • 3rd Party IT: Analysis, development and testing • Internal (WPD) IT: Analysis, development and testing • Internal User: Testing It was noted that Option C does not contain sufficient information to be certain that no unforeseen activities will be involved in its implementation.
Scottish and Southern Energy Power Distribution	*Confidential response provided*

© ELEXON Limited 2015

Respondent	Response
Electricity North West Limited	*Option A - Alphanumeric LLFC's / Option B – Longer Integer LLFC's* In the short to medium term we believe we have sufficient LLFC capacity, but long term when we hit the limit of 999 LLFC's we would need to make system changes to accommodate this option. *Option C – Multiple Market Participant Identifiers* This does not appear to be a viable option, we would need to make changes to multiple systems and it would introduce complexity to our processes and indeed industry processes.
GTC	We believe the impact to our processes and systems would be minimal for Options A and B. An extra MPID solution would require requalification of systems, a lot of testing, extra burdens on disaster recovery and our obligations under the MRA. We are not in favour of the extra MPID solution. We believe it would raise a number of questions which would need to be addressed with Ofgem on how distribution businesses would be expected to comply with licence obligations particularly with reference to 14. Would an additional licence be required for this solution? An extensive assessment would need to be conducted into what this option exactly entails and what an additional MPID would mean in relation to parties obligations. We believe this would cause a significant delay in reaching a solution and may potentially bring up additional more complicated issues than exist presently with the LLFC. This could therefore have a much wider impact than originally envisaged and the LLFC issue could then also persist for a much longer timeframe than this change was seeking to address.
GDF SUEZ Energy UK	Given the response time of this RFI we've been unable to complete a full impact assessment of all three options. Below is a high level assessment of the known system impacts. **Option A** The Alpha Numeric solution would have a significant cost to our organisation. The majority of our systems would need to be updated to reflect the change. This would include a coding change to the pricing, billing and sales systems. Also a number of programmes and EUAs that calculate losses for billing would need to be updated. **Option B** The 5 digit solution would have an even greater cost that option A. The same systems would be impacted; however we initially believe that increasing the number of digits is a more complex solution than the alpha numeric one. This is particularly the case in regards to producing documentation (quotes, contracts, bills etc.) that the LLFC appears on. **Option C** DNOs adding additional MPIDs would not have a significant impact

© ELEXON Limited 2015

Respondent	Response
	on our systems and for us would be the most cost effective solution. The main impact would be updated processes to handle the increased numbers of DNO MPIDs.
Npower ltd	Option A would most likely be the simplest to implement and cause the least amount of disruption, however it doesn't give the DSO's as much flexibility. Ideally we would only want to do this once, so if we need to opt for B to prevent re-work that could prove beneficial, as this gives the greatest amount of LLFC's per DSO and from a technical perspective requires the least amount of system changes. However we would require greater clarity on what happens to pre-existing LLF values. Ideally we would like these to be maintained. Option B would be very costly to implement, along with having to perform retrospective updates on existing LLFC records in our systems. Option C would be the least favourable option, due to the ambiguity that it may cause between DNO's and IDNO's. The finer details of this process, unknown as they are at this moment, would cause a lot of issues due to strict mapping rules within our systems with Duos Schedules. With options B and C, our EDI systems and invoice systems would be affected, along with anything that would show, store or use the top line.
British Gas	**Option A** - This would have a considerable impact to us, as this change would require system development for routing, loading and storing multiple data flows currently used in our settlement system, BMSV. There will be significant development and test costs to support the change and potentially impact our existing back-office reporting and DUoS settlement validation. Additionally there is an impact to changing the fields from numeric to alphanumeric **Option B** – Changing from 3 digits to 4 or 5 is likely to have a slightly lower system impact, but would require an MRA change as the format of the S number is specified in the MRA having been agreed by OFGEM. Our system BMSV is configured to load and store LLFC id to a numeric length of 5, therefore no system changes would be required for storing data in BMSV. There may be a requirement to make some changes for the routing and load packages, but these are identified as small changes. **Option C** - DNOs using multiple MPIDs may cause confusion/issues for some parties, as historically the DNO and MPAS have used the same MPID and this option would break that link. We therefore do not consider this to be a viable option.
SmartestEnergy	*Confidential response provided*
UK Power Networks	Option A would require changes to MPRS (which is used by all DNOs and IDNOs), as well as to our suite of billing systems which would require considerable revision along with the associated testing

© ELEXON Limited 2015

Respondent	Response
	required, this is limited to only these systems because at this stage we would not be looking to raise any Alphanumeric LLFCs for our regions. Option B would require wholesale changes to virtually all our systems (including those used for billing, customer and network planning / management), this would result in considerable work as well as significant cost for a change which at the current time we have no requirement for. Option C would not have any obvious costs on ourselves as a business, however would also appear to be the least clear to manage for any non DNO party (such as Suppliers) as it would require mapping between the DNO ID and LLFC which at the current time is not necessary.
Northern Powergrid	Northern Powergrid uses a number of systems to manage settlements data. The following systems will have to be updated to align with this change to the LLFC: MPRS DURABILL, DUoS Billing System System to apply LLFCs Unmetered Supply system MPAN generation system Internal Spreadsheets/databases; Regulatory reporting, charging & forecasting models With the update to these systems, there will need to be management on the basis of a number of projects which will look to explore and gather the requirements; allow time for the build of the system (either in-house or by the third party who support these) and user acceptance testing.
Salient Systems Limited	Options A, B – both options will require minimal system changes, data base schema changes, testing (HHDA system). Option B will require less change than option A. Option C – a bit of a worry ! Theoretically no change at any of our systems – until, that is, 99 distributor short codes are used up. At that point, HHDA system minimal (if any) impact, but at HHDC, HHMO, NHHDC, NHHMO systems high impact – to assure required flow outputs to distributors are directed to correct distributor mpid's. Where short code in MDD maps to > 1 possible distributor mpid then the above systems will need to receive data from appropriate data provider identifying which distributor mpid to use per appointed mpan - DTC and process changes implicated.
SSE Energy Supply Limited	Option A: Alphanumeric LLFCs (CP1434 proposed solution) would require fewer changes to our billing systems, than Option B: Longer integer LLFCs. The impacts to 3rd party settlement systems are reasonably substantial for either of these options, however we are

© ELEXON Limited 2015

Respondent	Response
	of the view the impact is unavoidable. We do not see Option C: Multiple Market Participant Identifiers as a solution that is directly comparable against Option A and B. Option C is not a full solution, as such we are unable to provide a detailed and robust assessment of the impacts. We do not see the benefit in undertaking an exercise in developing Option C as there is a fully formed solution ready to be taken forward. Furthermore, our initial assessment indicates Option C would have a broader and disproportionate impact, relative to the issue which it is attempting to address. We also view this solution as incomparable to Option A/B on account that it would result in an additional 999 LLFCs, whereas Option A and B would provide in the region of 39k and 100k additional LLFCs respectively. Secondly, we would challenge Option C as being viewed as a truly enduring solution as it would require each DNO that is requiring further LLFCs to deliver to the industry an additional DNO ID. This in turn would impact us because of the potential testing and system impacts needed to accommodate each instance of new DNO IDs. As a Supplier we do not believe setting up new DNO IDs, as and when DNOs require additional LLFCs, is an efficient or cost-effective solution.
IBM on behalf of ScottishPower	**A: Alphanumeric Solution:** We will require a change to Industry Systems to allow for the management of the changes to multiple flows containing the LLFC (approximately 15), this will require significant changes to multiple BSC systems, associated documents and reporting requirements. We believe that a full cost Impact Assessment is required. If this change were implemented we will incur significant IT costs to accommodate the data item changes within the flows, changes to our internal Registration and billing system (MPRS and Durabill) and other linked internal systems changes (e.g. Tariff Validation). Assessment of this change in its entirety is still undergoing assessment **B: Integer Solution:** We will require a change to Industry Systems to allow for the management of the changes to multiple flows containing the LLFC (approximately 15), this will require significant changes to multiple BSC systems, associated documents and reporting requirements. We believe that a full cost Impact Assessment is required. If this change were implemented we will incur significant IT costs to accommodate the data item changes within the flows, changes to our internal Registration and billing system (MPRS and Durabill) and other linked internal systems changes (e.g. Tariff Validation). Assessment of this change in its entirety is still undergoing assessment **C: Multiple MPIDs:** We believe that this is a far larger change

© ELEXON Limited 2015

Respondent	Response
	than was anticipated during initial discussions and would fundamentally change the relationship between the Distributor and the MPID. We do not believe that this is an option for progression due to the enormity of the changes across the Industry. We do not feel that this option has been defined to an extent that we could impact fully the End to End process.
ScottishPower	Option A (Alphanumeric): We would be required to perform changes to the format of LLFC fields within a variety of systems across Sales, Registration, Billing, Settlements and Flow Management as well as full testing of all reporting suites which utilise the LLFC data. Option B (Longer Integer): As with Option A we would require to perform changes to the format of the LLFC field across a variety of systems and reporting. In addition, we would also be required to review all methods of customer correspondence (sales quotations, welcome packs, bills etc.) to ensure the change in character length does not have any unforeseen consequences. Option C (Multiple MPIDs): The impact of this change is not yet fully understood and presents several questions. ScottishPower believes this option requires significant discussion and development before its full impact can be determined.
EDF Energy	Option A Changes will be required to our message transmission systems used to communicate under our various roles. These changes will include amendment to the data item type and validation of the dataflows of which this item is contained. There are a number of systems used for Settlement, DUoS charges and non-domestic applications which will require data type changes and potentially updates to standing data within tables to convert from Integer to Alphanumeric. This impact will be dependent on how the Data Transfer Catalogue changes are designed and how LLFC values are assigned and validated in MDD updates, for example whether current single and two digit Integers will be padded with zeroes and the permissible combinations of letters and numbers for new LLFCs. These systems will also need to be amended to cater for validation checks that are carried out to ascertain if the MDD combinations are valid. In terms of our Supply systems, we do not anticipate change with our domestic supply systems although this could be the case if there is no change to dataflow version numbering. Nonetheless testing would need to be carried out to ensure the LLFC is presented correctly on customer bills. However changes are likely to be required for our non-domestic supply systems although we are unable to provide a view on costs at this time. Option B The changes required to our message transmission systems will

© ELEXON Limited 2015

Respondent	Response
	have similar impact to Option A albeit changing from a 3 digit field to a 5 digit field. The same will hold true for a number of other applications. However in terms of our domestic supply systems the increase in field length will require amendment to bill stationary, underlying tables where this value is stored and mechanisms to transmit to print. Non-domestic supply systems are likely to involve similar change to Option A, although it is anticipated this could be an easier change for that particular system development. Option C Whilst we do not believe there will be impacts on our NHHDC role there will be significant change on our systems that undertake activities as a Supplier. Unfortunately as there is not enough information provided within the RfI documentation we are unable to understand how this will work in practice. Our provisional view is that this solution would not work effectively.
E.ON Energy Solutions Limited	The proposed changes will result in changes to a number of systems used on a daily basis. The LLFCs are used in a number of different processes across the business. The potential alternative solution of creating new MPIDS in a GSP region would not be our preferred solution. This would potentially duplicate a lot of supporting data already held for the MPID and GSP e.g. Market Domain Data which of itself may cause additional complexities for supplier and wider industry parties alike. For example if an MPAN on MPID A which needed a new LLF which was only declared on MPID B. Although both MPIDs might be for the same Network Operator, this may require changes to enable this to be communicated on a D0171. Of the proposed solutions of either an increase in integers or changing to an alphanumeric code, our preference would be for the Alpha Numeric as we believe this would have less overall impact than the others.

© ELEXON Limited 2015

Question 6: What implementation costs would your organisation incur in implementing each of the solution options?

Responses

Respondent	Response
ESP Electricity Ltd	OPTION A – SMRS would be impacted – a cost of £12K. Other internal systems will be impacted at an approximate high level cost of approx. £15K. OPTION B - SMRS would be impacted – a cost of £12K. Other internal systems will be impacted at an approximate high level cost of approx. £15K. OPTION C – SMRS would be impacted with an estimated cost of £150K. Other internal systems will be impacted at an approximate high level cost of approx. £50K.
IMServ Europe	Costings for Option A and B will be broadly similar and of the order of £ 30k while Option C cannot be costed at this time due to too many factors being unknown as described above.
Opus Energy Ltd	A change from a 3 digit numeric code to a 3 digit alphanumeric code (as shown under **Option A** of the RFI) would require changes, under a project, to all of our frontline applications. We would estimate costs in the order of £25,000 to change to use of an alphanumeric code. Because our systems are future-proofed to cope with what was the expected logical transition from the current 3 digit numeric code to a longer numeric code (e.g. a 5 digit integer as shown under **Option B** of the RFI) any possible impact to our organisation for longer integer LLFCs would be very minimal/none (this would likely be the same for any other organisation whose systems have been set up in a similar fashion). We have not yet had an opportunity to fully impact assess **Option C** "Multiple Market Participant Identifiers" but do have some concerns regarding the references in the RFI to some of the potential impacts that have already been identified; for example, that the LLFC ID is referenced in the core 13-digit MPAN and so may impact participants' systems. Whilst we do not support Option A (for the reasons as outlined above) the potential impacts of this solution appear more straightforward to identify than for Option C. For example, would there be impacts on ECOES or DCC? Also, if there was a change of LLFC (e.g. for a meter upgrade) could this require not only a change of LLFC but also use of a different MPID/LLFC combination? Generally, registering a second MPID when it runs out of LLFCs under its original MPID appears potentially confusing, especially if, as suggested the DSO was to further repeat this as and when it runs out of LLFCs under the MPIDs it has already registered.

© ELEXON Limited 2015

Respondent	Response
TMA Data Management Ltd	Low to medium costs for options A and B. Medium to high costs for option C.
Stark Software International Ltd (SSIL)	Approximation of implementations costs Integer solution – 3 Days Alpha Numeric Solution – 10 days Multiple Market Participant Ids – 30 days
Haven Power Ltd	*Confidential response provided*
Siemens Operational Services	Not available at this time. All three options would incur none trivial costs. We believe in ascending order there are: Option B Option A Option C
Western Power Distribution	Based on cost typical internal costs and costs provided by our 3rd Party Suppliers we have calculated the following costs of implementation: • Option A: £161,000 • Option B: £148,000 • Option C: £650,000* * The supplier of our DUoS Billing system were unable to put a cost on development for Option C as there was not sufficient information on which a realistic estimate could be provided. In order for this figure to be comparable to the others we have used an estimate of £500,000 of which WPD would pay 43%. These are high level cost estimates and would be subject to change.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	We believe the implementation of Option A – Alphanumeric LLFC's or Option B – Longer Integer LLFC's would be low cost. We understand that the costs of updating MPRS to cater for Option A or Option B would also be relatively low. We believe the implementation of Option C – Multiple Market Participant Identifiers would be relatively high cost. We understand that the costs of updating MPRS to cater for Option C would also be relatively high.
GTC	Option A & B would incur minimal costs to implement; we estimate less than £20k for either solution. Our asset database is already configured to accept either option therefore changes would only be

© ELEXON Limited 2015

Respondent	Response
	required to be made to MPAS and our billing system. Option C would be prohibitively expensive as it would require an extra instance of each database: registration, asset and billing. There would be ongoing maintenance costs for each of these systems and additional resources will be required, with associated licencing, in order to maintain them. The cost of this solution would be in excess of £200k.
GDF SUEZ Energy UK	Unfortunately given the response time on this RFI a full cost impact is not available. However we believe that to implement option B we would incur significant costs. These would be slightly less for option A. To implement option C we would incur a small cost.
Npower ltd	We are unable to provide a figure at this point, however with all options the costs will be significant.
British Gas	**Option A** – The full extent of this option is not yet known, however this would be treated as a change project and from previous experience would estimate the cost could extend to between £50-100k. **Option B** – On the assumption some amendments would be required for the routing and load packages, the cost could be estimated at 5-15K. **Option C** – not considered a viable option.
SmartestEnergy	We do not have precise information on costs at present
UK Power Networks	We have not determined actual costs for any solution. However at this time based upon the knowledge of each option we have, we believe that if a change is deemed to be necessary, option A would be least cost, option B the costs would be significant due to the number of systems and business processes which would need to be revised, whereas option C the costs would be zero other than for those parties requiring the change, but could cause bigger issues to suppliers and their agents in their understanding of the data.
Northern Powergrid	Each of our systems/reporting models will need to be amended in line with the change to LLFC. Below we have detailed the system and estimated costs associated with each option: MPRS: This cost for options A and B have been derived as part of an impact assessment, whereas option C is based estimate from our service provider which includes the development test and delivery of this change. Option A – £10k Option B – £10k Option C – N/a

© ELEXON Limited 2015

Respondent	Response
	DURABILL, DUoS Billing System: The cost for options A and B have been derived as part of an impact assessment. At present, given the limited information and additional questions we have (see Question 9) we are unable to provide a cost for Option C. The impact assessment saw that DUoS, HH and NHH metering areas within the system would be affected. Option A – £37k Option B – £29k Option C – N/a System to update LLFCs: This is an initial estimate based upon previous changes. Given the nature of this system and that it is driven by the LLFC, there will be a fundamental change to the system at a database level. Option 1 – £25k Option 2 – £19.2k Option 3 – N/a Unmetered Supply system: This is an initial estimate based upon previous changes. The change to this system is lower impact as the LLFC is only referenced in a small number of tables and screens. Option A – £10k Option B – £7.8k Option C – N/a MPAN generation system: This is an initial estimate based upon previous changes. The change to this system is lower impact as the LLFC is only referenced in a small number of tables and screens. Option A – £10k Option B – £7.8k Option C – N/a Other; Regulatory reporting, charging & forecasting models: This is an initial estimate based upon previous changes of a similar nature. All of these reporting tools will need to be amended and tested, as they have the LLFC present in some form. Option A – £5k Option B – £3.9k

© ELEXON Limited 2015

Respondent	Response
	Option C – N/a This results in costs for each option as follows: Option A – £97k Option B – £77.7k Option C – N/a* * We cannot currently give a cost estimate of option C as we feel that there is not sufficient information within the RFI (see question 9).
Salient Systems Limited	A, B – once-off costs < 2k C – not costed
SSE Energy Supply Limited	Option A would have the least overall impact and cost to our billing systems, with one-off costs being incorporated into the ongoing maintenance of our systems. Option B would have a more substantial one-off cost impact on billing systems, but these would not be viewed as high costs. Overall, we would estimate Option A to have a cost impact of around £55-£60K, with Option B being estimated at £80K+. We have very real concerns regarding the potential costs of Option C. Initial analysis indicates the changes to our systems and the level of testing required would be far in excess of either Option A or B. We are unable to provide a cost estimate. We would anticipate new DNO IDs would result in both one-off as well as ongoing costs if work needs to be undertaken each time a new DNO ID is required.
IBM on behalf of ScottishPower	**A: Alphanumeric Solution:** MPRS: £21k (Split among DNO parties) Billing System: £130k(Split among DNO parties) Internal Project costs: £75k estimate **B: Integer Solution:** MPRS: £21k (Split among DNO parties) Billing System: £100k (Split among DNO parties) Internal Project costs: £75k estimate **C: Multiple MPIDs:** MPRS: £150K (Split among DNO parties) Billing System: We are unable to quantify this as the consequential impacts on industry processes resulting from this proposal have not been fully assessed. There are a number of significant areas that would require a full review if this option were to progress.

© ELEXON Limited 2015

Respondent	Response
	Internal Project costs: £85k estimate
ScottishPower	Options A & B: While we provided indicative costs for Option A in a previous Consultation response, subsequent investigations have cast some doubt on the accuracy of those costs; as a result, a more thorough Impact Assessment has been triggered to consider both Options. However this has not been concluded as yet and, while early indications suggest the cost impact of both options are similar, the scale of these costs has yet to be determined. Option C: As referenced in our answer to Question 5 there are several issues that require discussion before we can quantify the cost of this option. We outline these more fully in our response to Question 9.
EDF Energy	The costs, where outlined below, are in relation to our message transmission, domestic supply, Settlement and NHHDC systems. At this stage we have been unable to determine costs for our non-domestic applications owing to the complexity and further use of LLFC in the non-domestic market. Four key systems within our non-domestic portfolio would required changes, two of those should be minimal change and minimal difference between option A and B. The other two systems which would have larger impact we have not been able to fully impact assess within this consultation period. All costs below are one-off and we do not anticipate on-going costs as a result of this change. Option A – approximately £60,000 to £105,000. (excludes cost for non-domestic system development) Option B – approximately £95,000 to £135,000. (excludes cost for non-domestic system development) Option C – we are unable to determine costs on any of our systems at this stage as we do not believe there is sufficient information on how this model will operate in order to provide an impact assessment. The MPID and Distribution Id is a one-to-one relationship therefore the use of multiple MPIDs is likely to have significant and unexpected impact.
E.ON Energy Solutions Limited	It is not possible to be specific but changes would be significant even for the alpha numeric solution.

© ELEXON Limited 2015

Question 7: How long from the point of approval would you need to implement each solution option?

Responses

Respondent	Response
ESP Electricity Ltd	Approx 10-12 months for each solution.
IMServ Europe	We would require a 6 month lead time.
Opus Energy Ltd	**Option A** (change from a 3 digit numeric code to a 3 digit alphanumeric code) would require changes, under a project, to all of our frontline applications. We would estimate costs in the order of £25,000 to change to use of an alphanumeric code. Given the IT impacts, and requirements to coordinate activity alongside the unprecedented level of other industry code changes such as P272 and Project Nexus, a lead time of at least 6 months would be required from point of approval to implementation. **Option B** (longer integer LLFCs) - Because our systems are future-proofed to cope with what was the expected logical transition from the current 3 digit numeric code to a longer numeric code this option would have no material impact to our organisation. Therefore, this option could effectively be implemented from the point of approval to implementation (this would likely be the same for any other organisation whose systems have been set up in a similar fashion). **Option C** "Multiple Market Participant Identifiers" – in line with our response to Question 6, the potential impacts of this solution would need to be thoroughly investigated. It is difficult to accurately estimate the required lead time unless further analysis is carried out, but this would be expected to be a minimum of 6 months given the expected IT impacts.
TMA Data Management Ltd	12 months.
Stark Software International Ltd (SSIL)	We would need two months from the point of approval to plan the inclusion of the amendments in the development and release cycle of the code
Haven Power Ltd	Due to the impact of current regulatory change pressures, we do not have any gaps in our release programme for at least the next 12 months, so would struggle to implement a solution with less than 12 months' notice. A short timescale will reduce the time allowed for testing, which in turn increases the risk of issues occurring that may impact our ability to produce timely invoices for customers.
Siemens Operational Services	We would require a minimum of one year following the approval of any of the proposed solution before its implementation. This is to allow for planning, a full impact assessment of the solution to be untaken against the impacted systems and to resource for development and testing. Any Change would be handled under our

© ELEXON Limited 2015

Respondent	Response
	Project management methodology.
Western Power Distribution	The most critical timescales on each of these options is with the 3rd Party supplier of our DUoS Billing system • Option A would take approximately 7-8 months for us to implement. There would then need to be a period of customer testing typically of about a month. • Option B would take approximately 5 months for us to implement. Again there would need to be a period of customer testing after. Due to existing programmes, they would only be able to commence the development in December 2015. This would mean that the planned implementation of June 2016 was only achievable with Option B. Our suppliers have not been able to put timescales on Option C as it is not clearly defined enough but it is reasonable to think the timescales would be longer than Options A or B.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	For Option A - Alphanumeric LLFC's or Option B - Longer Integer LLFC's we would expect a lead time of 6 months from the decision being made. For Option C - Multiple Market Participant Identifiers we would like to understand in more detail how this would work under a variety of scenarios before providing a lead time.
GTC	For Options A and B our asset database is already configured for either solution and therefore we would only need to make amendments to our billing database and MPAS. Timescales would then be dependent on when the next MPRS would be released and we are confident that we would be able to implement any changes within that timeframe. For Option C it would take a minimum of 6 months to implement this solution as we would need to make system changes, negotiate new contracts and/or licencing, system testing, training and potential requalification activities if it were considered to be a material change under the BSC and the MRA which might take significantly longer.
GDF SUEZ Energy UK	For options A and B we would require at least a 12 month implementation period from the date of agreement to the new LLFCs being available for use. We're unsure if option C actually requires any code change but we would probably need a 3 month lead time on this option.
Npower ltd	We would need a 12 month lead time at least to be able to implement the changes, taking into account all the other changes

© ELEXON Limited 2015

Respondent	Response
	that are being implemented in the near future that require IT resource, and the number of systems this will impact.
British Gas	**Option A** – This is not yet known, however as an approximation for the development and testing this would take 2-3 months. **Option B** – This is not yet known, although we estimate approximately 2 weeks **Option C** – not considered
SmartestEnergy	At least nine months, preferably a year.
UK Power Networks	This would need to be assessed based upon the exact solution, however we would expect that at least twelve months would be required for Option A or B.
Northern Powergrid	Northern Powergrid feels that given the other industry change (P300 and P272); that the current implementation date of June 2016 is rather ambitious. As such, we would propose an implementation date of April 2017.
Salient Systems Limited	Options A, B – one month notice required to plan and deliver refinements to clients Option C – minimum requirement of 3 months notice anticipated to address potential for > 99 short codes.
SSE Energy Supply Limited	For Option A we would expect be able to meet a June '16 implementation, as proposed in version 2 of CP1434. A decision in late June '15 would provide a 12 month lead time. For Option B we would also need a 12 month lead time, thought it would be more challenging that Option A. The important distinction is that Option B would, in our view, require a new Change Proposal to be raised and assessment by industry. As a consequence, it would severely compromise the ability of industry to meet a June 2016 implementation whilst also providing a 12 month lead time from the point of decision. Based upon the existing level of information available for Option C we would expect the lead time would need to be at least 12 months on account of the level of testing that we may need to undertake. Option C is not yet a fully developed solution and we believe it would require some degree of work group assessment to develop the proposal. This would have the effect of pushing a potential implementation date even further back, potentially to mid-2017 with the new LLFCs being available April 2018, or later.
IBM on behalf of ScottishPower	For options A and B if sign off is agreed by June 2015, we would be able to implement in April 2017, This allows for the appropriate timescales to include in MDD release in June 2016 (allowing for appropriate timescales for adherence to BSCP 128) For Option C it is unclear the full extent of the changes required, however we feel that the implementation timescales for this will

© ELEXON Limited 2015

Respondent	Response
	extend further than for Options A and B, as it is expected that the impact on central systems are greater
ScottishPower	Options A & B: Due to the similar nature of the activity required to be carried out for both Options it is anticipated both will require similar timescales to implement and test. While the full impact assessment has not been completed as yet a minimum of 12 – 18 months will be required to implement. It is worth noting that there are significant system changes required to be delivered for both the Gas and Electricity Industry and in some instance the same technical resource will be required to deliver these competing IT changes.
EDF Energy	We would require a 9 month lead time to implement Option A and 12 months for Option B. As per our response to previous questions we are not able to determine a lead time for Option C at this stage. Any decision would need to be mindful of major system changes through smart metering roll-out and Project Nexus. Whilst the latter is a change in the gas market, we do have shared resources to deliver change. This is pertinent as this CP will impact common processes for electricity and gas such as data flows and billing.
E.ON Energy Solutions Limited	For any of the options our preference is for 12 months.

© ELEXON Limited 2015

Question 8: Which of the three solution options do you believe would be the most cost-effective way to address the issue?

Responses

Respondent	Response
ESP Electricity Ltd	OPTION A as it provides a sufficient number of LLFCs and has far less impact on all systems (including BSC's systems) than options B and C.
IMServ Europe	Option B due to the factors described above
Opus Energy Ltd	**Option B** (longer integer LLFCs) – This was our expected logical transition from the current 3 digit numeric code to a longer numeric code, which would enable ample additional LLFCs to be created. Our systems were designed to accommodate this transition (and in the unlikely event that even more LLFCs are required at a future date could simply be extended further to the next logical numeric code). It is expected that this will be the same for any other organisation whose systems have been future-proofed in a similar fashion. Option B places the cost burden on those parties that have not future-proofed their systems in this way.
TMA Data Management Ltd	Option B as it offers more possible LLFC Ids than option A, however, the impact on our organisation is the same.
Stark Software International Ltd (SSIL)	Integer solution as our system is setup to allow for this to be extended
Haven Power Ltd	Overall, option A would be the most cost-effective.
Siemens Operational Services	Option B - Longer integer LLFCs. We believe this would require the minimum development effort of the three options to implement. Although the size of the LLFC attribute within our systems would increase because it remains as an integer the amount of validation amendments would be kept to a minimum in both batch and online applications. The amount of development effort to handle the changes to the DTC data flows would be the same as that for Option A.
Western Power Distribution	Based on the work we have done to date WPD believe that Option B would be the most cost effective and timely solution. See questions 6 & 7 for rationale.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	Based on the fact that Option A - Alphanumeric LLFC's would only need to be put in place when we come close to running out of LLFC's this would be the most cost-effective solution for ourselves. Option B - Longer Integer LLFC's would result in us having to

© ELEXON Limited 2015

Respondent	Response
	undertake changes sooner than we would actually benefit from its use, but is a far cheaper solution than Option C - Multiple Market Participant Identifiers.
GTC	The most cost effective solution for ourselves is Option B, depending on central system costs, we believe this to be the most cost effective and robust option. Our IT analysts have stated that an alphanumeric solution can cause issues for some systems and on this basis we suggest that issues which may arise from Option A may incur additional costs and potentially pose a risk to parties systems. Therefore we believe that although there may be a bigger upfront cost for central systems for Option B it is a more robust solution.
GDF SUEZ Energy UK	Option C
Npower ltd	Options B and C would have considerable increased cost to implement, in comparison to option A. This is changing something that has not been changed since 1998 with the introduction of MPANs. Our EDI systems and invoice systems would be affected, along with anything that would show, store or use the top line. The LLF is used, along with other things, to build the costs on what to charge customers, therefore would cause considerable investment in our systems.
British Gas	**Option B** - As this is the solution consistent with the format already maintained in our systems. This results in a lower cost and minimal development and implementation time. In addition it will not impact existing reporting and settlement validation.
SmartestEnergy	*Confidential response provided*
UK Power Networks	Option C is likely to be the most cost effective approach, as any change implications would be borne by the DNO or iDNO who have limited LLFCs available and the associated supplier parties. However, we believe that this could cause confusion for parties. At the current time the mapping of DNO/iDNO and 'DNO short code' at the start of each MPAN is clear. Under this approach an iDNO or DNO operating out of area, could potentially operate in multiple GSP regions using a number of 'DNO short codes'.
Northern Powergrid	With the information available at present, we believe that Option B is the most robust and cost effective solution. Not only is it the lowest cost from our perspective, but in terms of implementation time, we see this option as the shortest also. Finally, Option B offers 99,999 LLFCs, whereas option A only offers 39,304.
Salient Systems Limited	Option B – least impact option
SSE Energy Supply	As noted in our response to Question 6, from a Supplier perspective the lowest cost option would be Option A. As noted in our response

© ELEXON Limited 2015

Respondent	Response
Limited	to CP1434, we undertook analysis against Option B and found it to be less cost-effective; our position therefore remains unchanged. Concerning our share of costs to central systems, we note Elexon confirmed in the RFI that a previous assessment of Option A and B concluded the costs for Option B were 'significantly more' than Option A. We have no reason to believe that a revalidation of this analysis will result in a marked change of the result. Importantly, progression of Option B
IBM on behalf of ScottishPower	Changing to 5 digits would have significantly less impact on systems across the industry. We would support this option.
ScottishPower	Until we have visibility of the complete Impact Assessment it is not possible to answer this question.
EDF Energy	As we have not fully estimated cost for all changes we are only able to provide a provisional view that option A is likely to be the most cost effective solution. It is clear though that these are significant costs impacting a large number of parties under various roles. Whilst we do recognise that the number of LLFCs will increase greatly under both option A and B we would like to understand the longevity of each solution. As we have indicated in our answers to Question 5 and 6 as we have a distinct set of systems for our domestic supply business and understanding of costs involved to change the structure of the LLFC data item, we do have concerns that smaller domestic suppliers may be adversely affected by a change that is primarily introduced to assign site-specific LLFCs which will primarily be required for non-domestic customers. Having said that we hope the RfI will draw out the respective costs on parties so that the most cost-effective solution is identified for the industry as a whole.
E.ON Energy Solutions Limited	Alpha Numeric.

© ELEXON Limited 2015

Question 9: Please provide any further comments you may have on CP1434

Responses

Respondent	Comments
ESP Electricity Ltd	IDNOs are more significantly affected by the limited number of LLFCs available to them than the incumbent DNOs are and are keen to see a resolution to the issue to improve competition in connections.
IMServ Europe	-
Opus Energy Ltd	-
TMA Data Management Ltd	-
Stark Software International Ltd (SSIL)	-
Haven Power Ltd	Changes to Ecoes and Electralink would also need to be factored into timescales.
Siemens Operational Services	Will Industry-wide Joint Integration Testing of new/amended versions of the DTC data flows be undertaken? Siemens believe that JIT would increase confidence that any proposed solution will have a successful implementation.
Western Power Distribution	WPD are strongly opposed to the implementation of Option C as we believe that aside from the likely costs it will potentially have further reaching consequences that would take longer than the available time to evaluate effectively. Although WPD have a preference for Option B we are not strongly opposed to Option A however we would not be able to implement Option A in the proposed timescales.
Scottish and Southern Energy Power Distribution	*Confidential response provided*
Electricity North West Limited	-
GTC	We previously withdrew our support for an alphanumeric solution however upon further investigation we are happy that we could comply with Option A or B as our asset database has already been configured for either solution. Our preference would be for a longer integer as we believe this is less likely to cause system issues upon interaction with other systems for all parties and therefore less likely to incur additional costs. We have serious concerns in relation to Option C and believe more detail would need to be provided in order for this to be assessed

© ELEXON Limited 2015

Respondent	Comments
	properly. This option may have a much far wider impact than either Option A or B, therefore creating new, potentially more problematic, issues than this change was seeking to address. Option C also does not really treat the root cause of the issue and adds an additional layer of complexity which seems unnecessary. We do not believe that an extra MPID solution is cost effective in any way and places extra burdens on parties unnecessarily. Some of the associated costs would also not be recoverable, in view of Central registration etc… and in addition are particularly high for this solution.
GDF SUEZ Energy UK	An alternate option to increasing the numbers of LLFCs required would be to reduce the need for site or MPAN specific LLFCs, particularly for export customers.
Npower ltd	-
British Gas	-
SmartestEnergy	-
UK Power Networks	See comments above relating to option C in question 8.
Northern Powergrid	Northern Powergrid feel that to make a fair and informed decision, more information is required on option 3, with the below questions being asked by one of our service providers: In terms of DURABILL (our DUoS Billing System); Which Distributor MPID would the DUoS invoice be raised by: LOND, LON1 or LON2? Would a D2021 EDI DUoS Invoice contain data for a single MPID LOND or a mix of MPIDs LOND, LON1 and LON2? How would change of LLFC work where an MPAN moves from a LLF assigned to LOND on to an LLFC assigned to LON1 and then back to LOND? How would a Supplier correctly identify which tariff should be applied to an MPAN if the same LLFC ID value is used by LOND, LON1 and LON2? In terms of MPRS (Meter Point Registration System); • What additional information would be required to be held by Suppliers to correctly identify an LLFC to be used for an MPAN? Would this information be held in MPRS? Considering options A and B are lower cost and resource intensive and that option C would require a fundamental change to the way that MPRS processes distributor data, we feel that this change may attract unnecessary, additional pressure in this arena.
Salient Systems	-

© ELEXON Limited 2015

Respondent	Comments
Limited	
SSE Energy Supply Limited	As a Supplier we note the primary beneficiaries of the change are Distributors, however if DNOs are unable to provide LLFCs there are consequential impacts to our business. Firstly, if we do not receive Site specific LLFCs then we would assume generic LLFCs would instead be used. We would anticipate customers to challenge the legitimacy of this practice, which in our view is challenge that would be difficult to defend. By their very definition, a generic LLFC would not be accurate and would therefore impact the accuracy of charges on a site specific basis. There is also the risk of errors in the allocation of Loss Adjustment which we believe should be considered. We note that 12 of the 17 respondents to CP1434 supported CP1434. Nevertheless, we recognise the reasoning for this further RFI assessment given the high cost to central systems and various impacts to industry parties. As noted in the RFI, the 5 respondents that disagreed with the solution noted action did need to be taken. We welcome an expedient decision being made on this matter to provide certainty for system and process development in the coming 12 months.
IBM on behalf of ScottishPower	-
ScottishPower	Having investigated Option C as fully as possible it is unclear from the available detail how this would work in practice. For instance, how would a Supplier correctly identify which tariff to apply to an MPAN if the same LLFC ID value is used by a single Distributor with multiple MPIDs? What additional information would be required to be held by Suppliers to correctly identify an LLFC to be used for an MPAN? Greater clarity is also required over how the DUoS invoicing processes will be affected. (e.g does Distributor AAAA raise individual invoices for each of their MPIDs AAAA, AAAB and AAAC or in a single AAAA invoice?). This option will bring more complexity to this process and could have unintended consequences for other processes which need to be fully developed.
EDF Energy	We welcome further detail with regards to rationale for the change and also when implementation would be required by Distribution businesses. As this data item is sent within a number of flows already, including registration flows, we would like consideration to roll these changes in with any other changes on the horizon for example changes to registration under Central Registration Services. This could reduce costs on parties if similar objects and systems are being changed

© ELEXON Limited 2015

Respondent	Comments
	which should reduce impact on the design, build and test.
E.ON Energy Solutions Limited	-

© ELEXON Limited 2015