P339 'Introduction of new Consumption Component Classes for Measurement Classes E-G'

This Impact Assessment was issued on 29 July 2016, with responses invited by 19 August 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
EDF Energy	2/3	Generator, Supplier, ECVNA, MVRNA, Supplier Agent
IMServ Europe	0/2	HHDC, HHDA
National Grid Electricity (NGET)	1/0	Transmission Company
OVO Electricity Limited (OVOE)	1/0	Supplier
Salient Systems Ltd	0/2	HHDC, HHDA System Solutions Provider
ScottishPower	1/1	Supplier, HHDA
Siemens Managed Services	0/1	HHDA
SP Distribution / SP Manweb	1/0	Distributor
SSE Energy Supply Limited	1/0	Supplier
STARK	0/1	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management Ltd (MPID UDMS)	0/4	HHDC, HHDA, NHHDC, NHHDA
Western Power Distribution	4/0	Distributor

Question 1: Will P339 impact your organisation?

Summary

Yes	No	Neutral / No Comments	Other
10	0	0	2

Responses

Respondent	Response	Description of Impact
EDF Energy	Yes	Division of existing HH CCCs into more classes would require changes to internal systems and processes including: • Receipt of affected data files and loading to internal systems. • Potential changes to validation of CCC level settlement data against individual meter data. • Demand forecasting systems using data at level of CCC, with further change if there are changes to associated GSP Group Correction. • Meter performance monitoring, if there are subsequent related changes to meter performance measures. • Customer pricing, if there are subsequent changes to GSP Group Correction, meter performance charges or network charges in relation to individual CCCs.
IMServ Europe	Yes	As HHDA we will need to be able to produce required flows so as to include the proposed new CCCs and to be able to process MDD once implemented. This will require changes to our HHDA system. We anticipate the likely impact will be the D0040/298 and MDD flows.
National Grid Electricity (NGET)	Yes	Many of the proposals discussed within CUSC Modification CMP266 'Removal of Demand TNUoS as a barrier to HH Elective Settlement' are wholly dependent on the implementation of P339. The proposals which are dependent require demand data for Measurement Classes E,F and G to be separated out and provided to National Grid for the purposes of TNUoS billing and the avoidance of potential overcharging. Without P339, demand for Measurement Classes E,F and G can only be provided to National Grid on an aggregated basis. In terms of systems changes these would be limited as we already have a workaround in place following P272.
OVO Electricity	Yes	We believe that P339 is critical to the removal of many of the key barriers to Elective HH Settlement. Therefore, the

Respondent	Response	Description of Impact
Limited		successful implementation of P339 will increase the focus within the business on developing end to end capabilities to implement HH Settlement effectively. We see P339 as an 'enabling' modification. Ordinary industry operation will not be affected by implementation and as a result the operational impact is very low. We do not believe that the Consumption Level Indicator is required in MDD for the introduction of P339. It may be beneficial to add this to MDD at a later point to improve clarity but this should not delay the P339 implementation, as this in turn could delay the adoption of HH Settlement for small sites. We believe that the sensible approach is for the measurement class flag to be held in annex X-2 of BSC rather than an additional column in D0269. Under the assumption that the Consumption Level Indicator is not required in MDD, the impact on our internal business processes and systems of P339 will be minimal. If the Consumption Level Indicator was deemed to be required in MDD then the impact would be higher. Changes would be required to our systems, both in house and third party systems, that use MDD data taken from the D0269. The impact would be reasonably material but certainly not prohibitive.
Salient Systems Ltd	Yes	As a HHDC/DA systems solution provider to HH metering agents we will be required to apply changes to our impacted systems in order to meet the final requirements of P339 – solutions design, development, testing and mobilisation activities. For the proposed solution we do not anticipate impacts at HHDC and the impacts at HHDA will require non-complex reference data configuration changes rather than coded logic changes – so predominantly a data configuration and system testing exercise. However, if the alternate solution is favoured then similar HHDA configuration data changes and testing will be required, complemented perhaps by requirements for additional minor changes at HHDC (possible LDSO, Supplier optional/mandatory requirements against HHDC reporting of new export only MC data). Very likely here also that any additional consequent changes at our own HHDC will be accommodated effectively through changes to reference data configurations rather than by code changes. The alternate proposal will obviously also require administrative effort at Suppliers and agents to accommodate CoMC's (MS data configuration only) at

Respondent	Response	Description of Impact
		implicated export Mpans.
ScottishPower	-	Changes will be required to multiple systems, with the new CCCs being required to be updated as allowable values, and the treatment of these new values. Further changes would also be required if the flow version were incremented. Reporting functions would also be impacted to ensure that these new values were represented.
Siemens Managed Services	Yes	Introducing the new CCCs will involve a standing data change in our HHDA system. Documentation will be updated accordingly. The change will require full regression testing of aggregation and demand-disconnect volumes. New test data will need to be prepared to test the new CCCs.
SP Distribution / SP Manweb	Yes	If P339 is approved going forward we will have to create new export HH tariffs and such a move could potentially mean adjustment to the CDCM pricing model and a re-balancing of DUoS tariffs for customers.
SSE Energy Supply Limited	Yes	Yes, it is anticipated that there will be system impact, but this will be limited due to the changes already implemented under P300 i.e. functionality largely already exists.
STARK	Yes	The expected impact will be system updates related to potential changes to MDD plus any changes to relevant data flows & associated reporting requirements. Would not expect impact to be high, as this would be anticipated to build on from previous developments required for P300.
TMA Data Management Ltd	Yes	As a HHDA, our system would be impacted by the implementation of P339.
Western Power Distribution	-	The introduction of new Consumption Component Classes would in itself have limited impact on our systems and processes. However, we are aware that the SRAG recommendations has highlighted a number of areas where the additional Consumption Component Classes could then be utilised to achieve, for example relaxing of read performance requirements and performance monitoring, which could have an impact.

Question 2: Will your organisation incur any costs in implementing P339?

Summary

Yes	No	Neutral / No Comments	Other
9	2	0	1

Responses

Respondent	Response	Details of Costs
EDF Energy	Yes	*The respondent also provided a confidential response.* Costs associated with the processes described in question 1. These can be separated into: 1. Minimum change to accommodate dataflow format changes and consequential impacts resulting from internal use of the new CCCs within reporting, validation and monitoring processes. 2. Consequential changes resulting from potential related changes to GSP Group Correction, performance monitoring and charging, and network charging. 3. Consequential changes resulting from potential increased take-up of HH settlement. Implementation as part of a normal BSC Systems Release would probably be desirable if other planned changes to settlement reporting are intended around the same time. However, the benefit of this would depend on the nature of other changes expected, which is uncertain right now. The impact assessment refers to potential consequential changes to GSP Group Correction and DUoS charging, and the question may be more appropriate once there is more certainty on these issues.
IMServ Europe	Yes	One off costs: An approximate man-day effort of 15 days has been quoted based on producing new versions of the D0040/D0298 and processing including Consumption Level Indicator within MDD. The costs include: • Development, testing and deployment of HHDA System Changes to allow sending and receiving of flows based on new CCCs and MDD flows • Potential modification to internal Management Reporting **On-Going Costs:** • Additional Training, production of associated Procedures/LWIs, reporting, support, data storage resources, general resources etc.

Respondent	Response	Details of Costs
		• Additional Auditing/Performance Assurance support • Additional DTN costs
National Grid Electricity (NGET)	Yes	P339 will allow demand data to be split up for Measurement Classes E-G. We would require this split of data to be sent in addition to the P210 'TUoS' file, similar to the workaround put in place for P272. The additional file allows an adjustment to be made to demand data. The manual adjustment and provision of the demand data does result in additional costs being borne by both National Grid and Elexon
OVO Electricity Limited	Yes	Under the assumption that the Consumption Level Indicator is not required in MDD, there would be close to zero cost of implementing P339. If the Consumption Level Indicator was deemed to be required in MDD then the impact would be higher. However, we do not believe that the costs would be material.
Salient Systems Ltd	Yes	Once-off costs, covered by annual support and maintenance fees from agent clients. Marginal reduction in actual costs to ourselves if implementation is coincident with a normal BSC Systems Release scheduled date.
ScottishPower	-	*The respondent provided a confidential response.*
Siemens Managed Services	Yes	The documentation and standing data changes will need minimal effort and cost. The testing effort will be significant and will likely take several weeks, creating a large one-off cost. The costs should not be affected by whether P339 is implemented as part of normal BSC System Release or not.
SP Distribution / SP Manweb	Yes	While it is not possible to quantify the costs at this stage we would expect them to be minimal, though this is based on the assumption that that we will be only be required to introduce new HH Export tariffs and amend our DUoS billing system. However we note in the Potential Impacts section of the Impact Assessment that the workgroup are considering whether to introduce the Consumption Level Indicator data into MDD. If this was to be the case we would require to do a detailed analysis on the impact on our systems and given the paper view that there may be significant impacts on systems, these costs while currently unknown may be considerable. Furthermore, with regard to the implementation of P339, we would expect it to coincide with a new DUoS charging year I.e. from 1st April, which is outside of the normal BSC system release. We would also expect to see any potential DTC changes aligned with the P339 release date.

Respondent	Response	Details of Costs
SSE Energy Supply Limited	Yes	Yes, one off systems costs of approximately £25,000, but also possible ongoing DTN costs due the increase in the size of flows i.e. D0040 and D0296.
STARK	No	
TMA Data Management Ltd	Yes	There would be a medium to high one-off cost to implement P339 covering development, testing and implementation.
Western Power Distribution	No	

Question 3: How long (from the point of Ofgem approval) would you need to implement P339?

Responses

Respondent	Response	Explanation
EDF Energy	12 months	A lead time of a least 12 months from modification approval should provide sufficient time to adjust existing plans and prepare and test changes to the systems and processes described in question 1 in a reasonably efficient manner.
IMServ Europe	6 months	The lead time is based on carrying out the activities mentioned above. The lead time is unlikely to be affected whether this was part of or outside the normal BSC Systems Release.
National Grid Electricity (NGET)	None	
OVO Electricity Limited	Dependent on treatment of Consumption Level Indicator	Under the assumption that the Consumption Level Indicator is not required in MDD, we could be ready to implement P339 1 week from the point of Ofgem approval. If the Consumption Level Indicator was deemed to be required in MDD then the required lead time would be higher. We estimate that we would need at least 1 month from the point of Ofgem approval to be confident that we would be ready to P339 implementation.
Salient Systems Ltd	8 weeks	Required lead time from approval would be primarily driven by agent client resource planning constraints. 8 week lead time from approval required to complete our own internal activities (for completion within 2-4 weeks elapsed), 8 week lead time from approval expected at our agent clients to schedule UAT activities after our delivery. Lead times at our own activities and client activities would need to be longer (up to 16 weeks anticipated) if P339 were to require implementation outside BSC System Release schedule.
ScottishPower	-	A minimum lead time of 6 months would be required, however other large-scale industry changes would need to be considered as part of any implementation timescale.
Siemens Managed Services	Minimum 6 month	We need at least six months notice to resource, plan and execute the required testing prior to implementation. It may be helpful if the implementation was outside normal BSC Systems Release as this would reduce the clash for resource driven by other Changes to support Elective HH

Respondent	Response	Explanation
		which may form part of the normal BSC Systems Releases.
SP Distribution / SP Manweb	-	If DNOs are required to calculate and publish separate HH Export tariffs they would require a substantial lead time given that DNOs are only permitted to publish their DUoS tariffs 15 months in advance. Given the both current P339 and DUoS timescales, it is not possible for approval to be given in time for the next pricing round which will set tariffs for April 2018. Therefore the earliest date that new new export tariffs could be introduced is April 2019, it should also be noted that there is a current change going through the DCUSA process – DCP268 which proposes to implement HH tariffs across all NHH customers and has a target implementation date of 1 April 2019 and such we believe the P339 implementation date should also be 1st April 2019, to align with DCP268 should it be approved. It should therefore be noted that this date is outside of the normal BSC Release dates.
SSE Energy Supply Limited	6-9 months	It is estimated that notice of around 6-9 months from the date of OFGEMs approval of this change would be needed to make changes required to facilitate the change. Some performance testing of the systems would also be needed due to the expected increase in size of flows and the associated data storage and processing requirements.
STARK	3-6 months	We recognise the benefits of implementing P339 & as soon as possible, therefore once required changes are made known, that any related information i.e. what the correct group id will be in any MRA DTC flow changes is known during any lead time to allow for adequate testing, then we do not consider there to be any perceived difference in terms of lead times whether P339 is implemented as part of or outside of a normal BSC Systems Release however we could not determine a proposed date of implementation.
TMA Data Management Ltd	Minimum 6 month	
Western Power Distribution	*No response*	

Question 4: Do you believe that the 'potential alternative solution' as detailed in Section 2 of the Impact Assessment will address the issue identified in P339?

Summary

Yes	No	Neutral / No Comments	Other
1	8	0	3

Responses

Respondent	Response	Rationale
EDF Energy	-	The potential alternative solution would create a new measurement class for small export, under 100kW, which would be aggregated as currently along with other HH export into the existing HH export CCCs, but explicitly identified as a class within the the D0040 'Aggregated Half Hourly Data File'. The potential alternative highlights what could be considered an anomaly in the existing classification: that the level of maximum import at a site, above or below 100kW, determines the measurement class for the export as well as the import, even though the export and import might have quite different characteristics. Both flows are ultimately limited by the local connection circuit capability, and it is usually efficient to use the same metering equipment, but the characteristics of the flows in opposite directions might be deemed to have quite different significance for settlement measurements and network charges. It is not clear how HH export meters with maximum export under 100kW would be identified (eg. annually?) and what the change of measurement class process for them might be. The D0040 flow contains HH data aggregated by CCC. The proposal seems to contemplate also reporting aggregation by measurement class. This different "cut" of HH data might provide useful information, but significant changes to existing central and participant systems would be required to create it and make use of it. We have not investigated the internal work which would be required to do this at this stage. The possible alternative needs to be described more thoroughly. While there may be potential benefits in classifying exports according to maximum export capacity for settlement and other purposes, any such change should be made with careful consideration of the wider impacts and the long term consequences. Many different classifications

Respondent	Response	Rationale
		of types of flow and types of consumer/producer/importer/exporter are possible, and it may be better to consider this as a separate issue. Taking the issues explicitly identified in the modification proposal: 1. "aggregated export cannot be settled [separately from export in other measurement classes] under these measurement classes [E,F,G]" The potential alternative would distinguish different sources of HH export in HHDA D0040 files, but not in GSP Group Corrected CCC level data used and reported by central systems for settlement purposes, so does not appear to resolve this issue. 2. "unmetered and unregistered Export from microgeneration sites (primarily solar sites registered in the Feed-in-Tariff scheme)" creates a benefit for NHH meter import but not for HH import, specifically Measurement Class F (domestic HH), creating an obstacle to migration to HH in that class. GSP Group Correction operates at the level of CCC. Without new CCCs for each measurement class and for export and import within those measurement classes, it would not be possible to apply GSPGC individually to measurement classes E,F and G and to export and import within them. So any measure to create equivalance of GSP Group Correction for NHH and HH import below 100kW would have to apply to all below-100kW HH import. Similarly, without aggregating export from smaller sites into new CCCs for the purpose, any measure to change GSP Group Correction would apply to all HH Export. The alternative suggests separate aggregation of exports for HH meters below 100kW export, but it is not clear how this would be separately GSP Group corrected. The potential alternative does not appear to provide the flexibility to deal with this specific issue. 3. Aggregation of microgeneration export from registered export meters to a specific CCC would "would mitigate Export from impacting the GSPGCF". All registered export appears in existing CCCs and is allowed for in determining GSP Group Correction. Use of a separate CCC for small HH exports would allow correction to be applied differentially between smaller and larger HH exports, but it is not clear what errors this would mitigate. Whether or not there would be benefit in this, the potential alternative does not appear to support GSPGC at CCC level. 4. "individually allow small HH sites to receive the GSPGCF benefits arising from low GSPGCFs that are

Respondent	Response	Rationale
		currently received by Non-Half Hourly (NHH) registered Metering Systems" Note that GSPGC operates in different directions in different settlement periods, and is not necessarily a "benefit". The current distinction for below-100kW HH imports allows separate GSPGC for HH imports in MC E,F,G collectively. As above, the potential alternative would not permit distinction between these classes if that was desired, and would not permit different GSPGC for small HH export and other HH export. 5. "help facilitate elective HH Settlement for small sites by enabling Performance Levels to be set separately for each Measurement Class." To the extent that performance monitoring relies on settlement data reported at the level of CCCs which do not distinguish Measurement Classes (E,F,G) or small HH export and other HH export, it appears the potential alternative would not help this issue. 6. "more flexibility to the BSC specified charging methodology and allow charging for smaller HH Metering Systems. For example, Measurement Class "F" to be separated from traditional HH charging (Measurement Class "C")" To the extent that BSC specified charging relies on settlement data reported at the level of CCC, the potential alternative would not help this issue. But it is not absolutely clear what the issue is, or how new CCCs (proposal) or new measurement classes (potential alternative) would resolve it. 7. "The new CCCs will allow HH Export to be aggregated and charged under the revised DUoS tariff (noting that DCUSA DCP268 'Charging Using HH settlement data' will further look to revise the DUoS Charging arrangements)." It is not clear that future DUoS charging will require settlement reporting at the level of CCCs. The existing charging for aggregate HH measurement classes F and G uses data in the SVAA D0030 "Non Half Hourly DUoS Report", which also contains profiled data which could probably be used for DUoS charging revisions. This relies on mapping between LLFCs and Measurement Classes for meters in the relevant Measurement Classes, as provided by distribution companies. It seems likely that the use of a new measurement class(s) as in the potential alternative, together with appropriate mapping of LLFCs, could provide data within the D0030 file suitable for future DUoS charging of new measurement classes. However, there may be better

Respondent	Response	Rationale
		ways of achieving this given future wider developments in registration and data processes.
IMServ Europe	No	We don't think another partial solution should be considered leaving the door open for another potential proposal to be raised in order to plug any shortfall.
National Grid Electricity (NGET)	Unsure	From National Grid's perspective the question would be "Does the proposed solution, allow demand data to be split up into separate Measurement Classes". If not, although the alternative may address the issue identified in P339, from an Industry efficiency perspective, which ultimately affects the end consumer, solutions should be selected which complement other modifications.
OVO Electricity Limited	No	The identified 'potential alternative solution' would enable the aggregation of small scale HH export, which is a good thing. However, this is not the main rationale for the Modification. The alternate solution does not enable the key barriers to HH Settlement of small scale supply to be addressed. If this solution were adopted it is highly likely that a further modification would be required to enable the Measurement Classes "E", "F" and "G" cannot be separated in Settlement. We firmly believe that the right approach is to implement a modification that creates an enduring solution to the elective HH settlement of small scale supply AND HH settlement of small scale generation. In addition, while HH settlement of small scale generation would be a positive move, there is currently as no commercial rationale to meter small scale HH export. The value of the settled energy is less that then rate offtakers must pay to the generator under the FiT scheme. Suppliers are therefore incentivised to leave small scale generation sites unmetered with deemed export. This means that if the alternate solution where adopted, it is very unlikely that suppliers would utilise the new Measurement Class.
Salient Systems Ltd	No	The alternate solution including the provision of additional CCC's (as stated in the assessment document) will provide an improvement to the current status quo. However, extending the policy to position additional CCC's at existing MC's E, F and G so that both AE and AI are addressed within each MC is a more consistent reflection of data model design, rather than introduction of a new export MC against which aggregated settlement data will be more cumbersome to dis-aggregate. The proposed solution will go that extra step further to address the objectives of P339 and with less overall impact than the alternate solution.
ScottishPower	-	Yes it does address the issue identified, how the change to MC would result in a much more widespread impact across

Respondent	Response	Rationale
		industry parties, so ScottishPower do not envisage this as an option that should be progressed.
Siemens Managed Services	Yes	This would provide a solution to the issue. It would reduce the development and testing that we as HHDA would have to undertake. Although there would be increase development costs to Central Systems with this alternate solution the overall total cost to the Industry may be less than the proposed solution.
SP Distribution / SP Manweb	No	While we agree that the potential alternative solution may address some of the issues that P339 has identified, we believe that P339 should provide a full solution that addresses all the issues and not a part solution. While the D0040 will provided information to Suppliers and SVAA it does not take into account how DUoS tariffs will be charged, especially if customers who elect to go HH for both import and export decide to choose an alternative Supplier for either import or export, assuming they are allowed to do so.
SSE Energy Supply Limited	No	The alternative solution would limit the size of relevant flows, however, it removes flexibility around targeting error through GCF scaling weights and supplier performance level application.
STARK	No	
TMA Data Management Ltd	No	The potential Alternative solution would not offer as much flexibility as the original solution for P339. The impact on our system would be the same, therefore we are supportive of the more adaptable solution.
Western Power Distribution	No	Although the "potential alternative solution" could possibly address the issue identified we do not believe that this is a viable alternative as a new aggregated HH export under 100kW measurement class would significantly impact our systems and incur high cost. If this potential alternate solution were to be approved, we would require a lead time no less than 9 months to implement.

Question 5: Do you believe there are any other possible alternative solutions to P339 that the Workgroup should consider?

Summary

Yes	No	Neutral / No Comments	Other
0	10	2	0

Responses

Respondent	Response	Rationale
EDF Energy	-	
IMServ Europe	No	
National Grid Electricity (NGET)	No	
OVO Electricity Limited	No	
Salient Systems Ltd	No	
ScottishPower	-	
Siemens Managed Services	No	
SP Distribution / SP Manweb	No	
SSE Energy Supply Limited	No	
STARK	No	
TMA Data Management Ltd	No	
Western Power Distribution	No	

Question 6: Do you have any further comments on P339?

Summary

Yes	No
6	6

Responses

Respondent	Response	Comments
EDF Energy	Yes	This proposal is a facilitator for other potential changes to settlement and network charging and performance arrangements, and the true cost and value of the changes proposed by P339 depends on those other changes. Some fundamental questions need to be addressed for these other changes, and it would be sensible to answer these before approving P339, for example: In future, the historic distinction and relationship between HH and NHH and between above and below 100kW and between import and export will change, and probably become less relevant. 1. Who should pay or receive amounts related to actual or estimated errors in volume allocation in each half-hour? 2. Should errors which can be attributed to a particular class of meter be allocated to all meters in that class, or shared more widely? Which class (CCC as currently, or measurement/profile/size etc)? 3. Should payment or receipt of amounts related to errors in volume allocation in each half-hour be allocated according to classes of end-user or level of flow or capacity of flow or direction of flow or type of meter or type of registrant or type of agent etc? 4. What is the materiality of the relevant errors/adjustments, and how much will it affect behaviours?
IMServ Europe	Yes	It is disappointing that Parties and Party Agents are again impacted by changes to CCCs so soon after making changes under P300. We don't really understand why this was not implemented under P300. We note the comment of 'this would have increased the size of certain data flows' and assume this relates to flows such as D0040/298 and D0270. We are not sure why the increase in size was considered significant enough to not create the CCCs in this proposal

Respondent	Response	Comments
		at the time of P300 and therefore am unsure why this is now considered to be no longer a significant factor. We are also unsure why Elexon think 24 or 26 new CCCs need to be created, what is the combination of variables that cause this many unique combinations? Will each Measurement Class have its' own CCC? Obviously the more CCCs that are introduced, the bigger the impact on affected parties, the greater the risk of introducing the change and potentially the amount of resource required to deliver the change. We would like to understand the combinations. We would hope that lessons have been learnt from the previous change under P300, as this did adversely affect Settlement for a period shortly after go live, due to some ambiguity in the requirements and at least one Party Agent misinterpreting what changes were required. What steps has Elexon taken to ensure this doesn't happen under this Proposal? As a consequence of this lack of clarity there were additional indirect costs to Party Agents off the back of this. Is there any reason why no question has been included asking whether respondents support this change or not and reasons why? We are generally supportive of this proposal. In terms of release approach, we would suggest in order to minimise risk to the Settlement process that other changes to the HHDA process should not take place in conjunction with this one if at all possible.
National Grid Electricity (NGET)	Yes	The timing of the Implementation of P339, impacts on proposed solutions for CMP266. If a meter migrates before the implementation of P339, this then prevents the demand for this meter being separated from other meters in different measurement classes and therefore potentially charged differently. For these reasons an implementation date before the start of the charging year starting on 1st April 2017 is clearly beneficial to industry. If this is not achievable then we would like this to be confirmed as early as possible, with a definite alternate date. The further the implementation date moves into the charging year 2017/18 the less cost reflective TNUoS charges may become, or added complexity is needed to make them cost reflective. Additionally we would encourage analysis to be done on whether there is any non-time bound scheduled work, which could be delayed in favour of P339, or whether P339 could be simplified or part implemented to aid CMP266.
OVO Electricity	Yes	For the industry to extract maximum value from the massive investment that is being made in the Smart Meter

Respondent	Response	Comments
Limited		roll out it is logical that the meter data is used in settlement. In addition to the barriers identified in the P339 Impact Assessment, the introduction of P339 is critical to enabling the application NHH TNUoS charges to Measurement Class F and to the development of an effective Change of Measurement Class Process to support Elective HH Settlement. Without the prompt implementation of P339, the industry will not meet Ofgem's stated target of enabling Elective HH Settlement at scale in early 2017. We therefore believe that the industry needs to take a pragmatic approach to P339, and in particular whether the Consumption Level Indicator is not required in MDD. We acknowledge that if designing the process from scratch it would make sense to include the Consumption Level Indicator in MDD. However, this is not a requirement for P339 to be implemented and so should not be allowed to delay the industry and consumers from capturing the potential material benefits from HH Settlement.
Salient Systems Ltd	Yes	It would seem within the bounds of possibility that additional MC's may be proposed by Industry in the future as contributing mechanisms to achieving the objectives of ongoing settlement reform at an energy landscape that is and will continue to change at pace. Where any proposed additional MC's have value then the measurement and aggregation facilities employed to uncover that value must be appropriately focused and specific. The proposed P339 solution will contribute to any persisting policy to be applied to accommodate the introduction of additional MC's.
ScottishPower	No	
Siemens Managed Services	No	
SP Distribution / SP Manweb	Yes	Within the Potential Impacts section, we note that the workgroup are considering the addition of the Consumption Level Indicator data into a MDD, which could have a significant impact on parties. This being the case we would expect to see a robust business case and a full cost analysis of such, so as to allow parties to make an informed decision.
SSE Energy Supply Limited	No	
STARK	No	

Respondent	Response	Comments
TMA Data Management Ltd	No	
Western Power Distribution	No	