

CP Consultation Responses



CP1519 'Treatment of Low Capacity Connections for Site Specific Line Loss Factor Calculations'

This CP Consultation was issued on 12 August 2019 as part of CPC00796, with responses invited by 6 September 2019.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Power Data Associates Ltd	Nil	Trade body
UK Power Networks	One	Distributor
Western Power Distribution	Four	Distributor
TMA Data Management Ltd	One	Supplier Agent
Electricity North West	One	Distributor
SP Distribution SP Manweb	One	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Power Data Associates Ltd	✓	✗	✗	✓
UK Power Networks	✓	✓	✗	✓
Western Power Distribution	✓	✗	✗	✓
TMA Data Management Ltd	✓	✗	✗	✓
Electricity North West	✓	✗	✗	✓
SP Distribution SP Manweb	✓	✓	✗	✓

Question 1: Do you agree with the CP1519 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Subject to amendments identified below. Further considerations should also be considered to Principle 8 as described below.
UK Power Networks	Yes	The obligation to calculate site specific losses on EHV sites is to ensure losses are appropriate where the size of the connection has a significant material impact. This CP removes the obligation for small EHV connections where the impact is not material.
Western Power Distribution	Yes	Western Power Distribution networks are modelled using industry standard computer software. These models are subject to the same "signal to noise" problems as those outlined by the change proposer. If the settlement meter data values being switched in those models are not significantly larger than the noise, then the models are likely to return spurious values for the LAFs.
TMA Data Management Ltd	Yes	No response provided
Electricity North West	Yes	As per ENW practice. EHV connections for <1MVA capacities often produce low level losses beyond 3dp accuracy in terms of variable losses. If fixed loss apportionment is applied, this can lead to high value LLFs due to overall loss recovery over minimal units. Therefore, an acceptable alternative approach would be to apply a generic LLF under those circumstances. Generic EHV LLFs are produced from the New LAF model.
SP Distribution SP Manweb	Yes	The proposed solution will help resolve an issue that was identified during a 'lessons learned' exercise with Elexon, in addition it also aids the refinement of Principle 17.

Question 2: Do you agree that the draft redlining delivers the CP1519 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	2	0	1

Responses

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

Respondent	Response	Rationale
Power Data Associates Ltd	No	<p>The draft red-lining adds a new a) & b) but does not make clear whether these are joined by 'and' or 'or', so does one condition have to be true or both? I think the join should be 'and' to require both conditions to be true.</p> <p>In Appendix 3 the additional text includes the term 'may' this should be replaced with 'shall'.</p>
UK Power Networks	Yes	No response provided
Western Power Distribution	Other	<p>We agree with the redlining as shown, but are of the opinion that it does not capture all the scenarios where substitution with generic loss adjustment factors is appropriate. For example solar farms do not export enough power during the "Night" and "Winter Peak" STODs to enable accurate calculation for those LAFs. Similarly, for commercial reasons, Diesel generator "STOR" sites and "Gas Peaking Sites", often do not generate during the night STOD. There is a real danger that the historic meter data for the "Night" STOD could return a spurious value for the LAF and that this could then cause material errors in settlements if the site changes its' pattern of working.</p> <p>A third scenario should be added to the redlined text in BSCP128 section 3.1.17 along the lines of the text added to the comments section below.</p>
TMA Data Management Ltd	Yes	No response provided
Electricity North West	No	Redlining states 'the primary connection is at EHV but there is a subordinate connection that is NOT at EHV'.

Respondent	Response	Rationale
		<p>The issue described in CP1519 consultation states 'Subordinate connections have a low maximum demand and consumption and, if they were single connections in their own right, would be connected at lower levels with generic LLFs'.</p> <p>The second statement implies the subordinate connection is therefore at the same voltage level as the primary. Is this correct?... please read question 6</p>
SP Distribution SP Manweb	Yes	No response provided

Question 3: Will CP1519 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	4	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	No	Nil response provided
UK Power Networks	Yes	It will reduce the number of connections where site specific calculations are required.
Western Power Distribution	No	The WPD methodology already excludes calculations for particular sites STOD(s) where the historic average meter readings average less than 100kW over the STOD(s). CP1519 therefore represents a change in the thresholds for the calculations rather than a major change in technique.
TMA Data Management Ltd	No	No response provided
Electricity North West	No	No response provided
SP Distribution SP Manweb	Yes	Only to the extent that it will now become part of the ongoing LLF process.

Question 4: Will your organisation incur any costs in implementing CP1519?

Summary

Yes	No	Neutral/No Comment	Other
0	6	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	No	Nil response provided
UK Power Networks	No	Non anticipated
Western Power Distribution	No	WPD has similar processes already in place for use when preparing the meter data for the LLFC calculations.
TMA Data Management Ltd	No	No response provided
Electricity North West	No	No response provided
SP Distribution SP Manweb	No	No response provided

Question 5: Do you agree with the proposed implementation approach for CP1519?

Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	No response provided
UK Power Networks	Yes	As proposed
Western Power Distribution	Yes	The methodology that WPD is using to produce the site specific LLFCs for April 2020 already includes measures designed to screen out the calculation of spurious LAFs where the power flows are insufficient. As a clarification regarding the implementation date, WPD see this change as applying to LLFCs calculated or recalculated after February 2020. WPD do not see this change as invalidating the methodology used in September 2019 for LLFCs effective 01/04/2020.
TMA Data Management Ltd	Yes	No response provided
Electricity North West	Yes	No response provided
SP Distribution SP Manweb	Yes	The proposed implementation date allows for sufficient time to prepare the 2021/22 LLF information, in addition we also note that the implementation date also permits us to carry out a 2020/21 mid-year adjustment if this were to be found necessary.

Question 6: Do you have any further comments on CP1519?

Summary

Yes	No
4	2

Responses

Respondent	Response	Comments
Power Data Associates Ltd	Yes	The consultation document refers to STOD yet a number of LDSOs do not determine multi-rate LLF for EHV. I raised this in a previous consultation and ISG 'undid' the requirement to make Principle 8 apply to Generic and Site Specific . With the direction of travel towards more accurate settlement through the SCR for Market Wide HH Settlement the opportunity should be taken to require the use of at least two rated (day & night) for all LLF.
UK Power Networks	No	No response provided
Western Power Distribution	No	No response provided
TMA Data Management Ltd	No	No response provided
Electricity North West	Yes	<p>A definition of 'Connection' in terms of CP1519 would be beneficial.</p> <p>A primary connection and a subordinate connection would be considered as two connections, both with separate MPANS and both with independent LLFs. Therefore, primary connection could be at EHV with a Site-specific LLF and a subordinate (and independent connection) could be at a lower voltage with a generic LLF. This would not require amendment to principle 17 if it is a separate connection point on the network.</p> <p>If we are referring to import and export capacities associated with a single EHV customer (say a power plant - as used as an example), it would be the same connection (so x1 connection point) with separate import and export MPANS. Under this circumstance, where say the export capacity could be 100MW and the import capacity could be <1MW... then it could potentially lead to unrealistic LLFs and the change proposal may apply. The issue would be be the same connection point with polar</p>

Respondent	Response	Comments
		<p>extreme import and export capacities, not two connections points as the CP suggests....</p> <p>The above is based on ENW LLF practice and understanding.</p>
SP Distribution SP Manweb	No	No response provided

BSCP128

Respondent	Location	Comment
Western Power Distribution	3.1.17	<p>A third scenario should be added to the redlined text in BSCP128 section 3.1.17 along the lines of;</p> <p>“(c) Where analysis of the actual meter data for a site shows that the average power flow is less than 1MVA during a particular STOD then the generic value for that voltage level will be applied for that power flow direction for that site for that STOD”.</p>
Electricity North West	3.1	<p>A Site has multiple connections to the Total System and the primary connection is at EHV but there is a subordinate connection that is not connected at EHV, then a generic methodology MAY be used for the subordinate connection (even if a Site specific LLF is used for the Site’s primary connection as per Principle 1)</p> <p>Alternative understanding:</p> <p>If a connection to a customer is at EHV, due to the import/export capacity associated with it’s primary purpose, but a much lower import/export capacity is also required for secondary purposes, which could independently warrant a non EHV connection... then a generic methodology MAY be used for the lower capacity LLF.</p> <p>I agree with the 1MVA limit.</p>

BSCP128 Appendix 1

Respondent	Location	Comment

BSCP128 Appendix 3

Respondent	Location	Comment

BSCP128 Appendix 10

Respondent	Location	Comment