P280 New Measurement Classes

Consultation issued on 30 April 2012

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Western Power Distribution	4 / 0	DNO
Electricity North West	1 / 0	DNO
GTC	1 / 0	DNO
Imserv Europe Ltd	0 / 6	NHHDC / NHHDA / MOp
Northern Powergrid	2 / 0	DNO
ScottishPower	3 / 1	Supplier, Distributor and Party Agent
E.ON	5 / 7	Supplier, HH DC, NHH DC
SSE PLC	6 / 0	Supplier/Generator/ Trader / Party Agent / Distributor
RWE npower	9 / 0	Supplier and Party Agent
UK Power Networks	4 / 0	DNO
EDF Energy	10 / 0	Supplier / Party Agent / Consolidator / Generator / Exemptable Generator / Trader
SmartestEnergy Limited	1 / 0	Supplier/trader/consolidator
British Gas	1 / 0	Supplier

Question 1: Do you agree that the P280 solution should be extended to Export in this way?

Summary

Yes	No	Neutral/Other
11	1	1

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	It would be very advantageous to be able to settle actual half hourly data from small scale export via aggregate billing.
Electricity North West	Yes	As export sites increase it makes sense to consider whether the present method of dealing with these sites and their allocation to one set of CCC's is the approach the industry wants to adopt. This should be considered in light of the benefit seen by the industry in having further CCCs in this area.
GTC	N/A	N/A
Imserv Europe Ltd	Yes	There is an increase in customers within the proposed measurement classes who are generating and consequently more export data is being collected - it is therefore logical that export should be included.
Northern Powergrid	Yes	Northern Powergrid feel that all relevant consumption types should be incorporated especially export as the growth/uptake associated in this area will continue to rise for the foreseeable future. Therefore, incorporating export now would assist in the efficient manageability of the data and costs.
ScottishPower	Yes	It makes sense that any Export metering on a site, should where possible be treated exactly the same as the Import meter on site.
E.ON	Yes	This would be a pragmatic approach, and would allows Suppliers and DNOs to manage any surplus generation accordingly.
SSE PLC	Yes	Gives consistency and clarity
RWE npower	Yes	Our view is that additional Export Consumption Component Classes will provide a clear 'view' of export values associated with the new measurement classes.
UK Power Networks	Yes	Our view is this solution is a pragmatic way of dealing with small generation
EDF Energy	Yes	We have concerns in principle with this proposal. But if it were to be implemented, it would be consistent to extend the solution to Export sites, for which the number might increase considerably in future, and for which there might also be an increase in half-hourly settlement in future.
SmartestEnergy Limited	No	The consultation document is very confusing in this area as it is not clear whether it is referring to new measurement classes for HH or NHH. At the moment all export >30kW must be settled half hourly and DUoS billing is site specific. We would strongly oppose any proposal which allows aggregated billing for any sites which currently receive site specific bills, as it

Respondent	Response	Rationale
		would impact upon our ability to validate the bills. It is also unclear as to why responsibility would rest with the SVAA to calculate the data, rather than the Distributor, and there is also no guidance as to how and when Suppliers should elect to use the new Measurement Classes, and consequently is open to interpretation and possibly gaming. For micro-generation (NHH) we are of the view that some kind of aggregation may be acceptable, but as there are currently only 3000 to 4000 of these sites in the country and it has not increased over the last few years (even with the advent of FiTs) we wonder whether there would be any point in making any special arrangements at this stage.
British Gas	Yes	Ideally the solution should be extended to export where cost effective to do so.

Question 2: Should the three new Measurement Classes share a single set of six Export Consumption Component Classes, or should each one have its own set of six Export Consumption Component Classes?

Summary

Share a single set of six	6 per new MC	Neutral/Other
3	3	7

Responses

Respondent	Response	Rationale
Western Power Distribution	Neutral	WPD does not have a strong view on the number of CCCs for export MPANs.
Electricity North West	Neutral	We can understand the logic being applied from the HH market for Measurement Class C and E to the three new Measurement Classes for aggregated HH thereby supporting a single set of six new CCC's. Equally if the industry sees benefits in increasing this further for each Measurement Class and there are no significant costs then we can support a set of six for each Measurement Class. It does however beg the question as to whether there should then be a further set of six for Measurement Class C and E.
GTC	N/A	N/A
Imserv Europe Ltd	N/A	We are neutral as an agent.
Northern Powergrid	Set of Six	A single set of Export Consumption Component Classes would be in line with the current approach for Measurement Classes C and E. However, Northern Powergrid would like confirmation that all settlement data for these New Measurement Classes will be reported within the VMR group of the D0030.
ScottishPower	6 per new	Given that our preference would be to distinguish

Respondent	Response	Rationale
	MC	Export sites within each Measurement Class we prefer the alternative approach which would introduce a separate set of six new Consumption Component Classes (CCC) for each new Measurement Class. However we also believe that it may be prudent to reduce the CCC for each class down to four as we cannot envisage a scenario where M would be used given that it only applies to EHV sites that have site specific LLFCs.
E.ON	Neutral	• This would allow for the industry to manage their arrangements more efficiently. • There will be an impact on the COMC process, going from 5 measurement classes to 6. • If there are three sets of six Consumption Component Classes, i.e. six for each of Domestic, Non-Domestic Whole Current and Non-Domestic CT Metered, it clearly defines a set of customers as Domestic users. If changes will be made to the Distribution Licence Condition to accommodate this, it would make more sense to have three sets so that the DNO can aggregate them separately. If the DLC remains as it is then we would have to stick with one, undefined set of six and the DNO would aggregate all MPANs together, regardless of Measurement Class. • If we opt in, we have to make sure the portfolio is clean. If we don't opt in, how would COMCs be affected? We would have to do cosmetic COMCs (at point of registration?). Significant workload, already a very manual process. • If we don't support P280, enormous cost implications for DNOs. If we do, would there be a need for new DC/DA systems? • How can LLFs be calculated with 3 digits
SSE PLC	Set of Six	Yes subject to it having the same arrangements as import
RWE npower	6 per new MC	Our view is that additional Export Consumption Component Classes will provide a clear 'view' of export values associated with the new measurement classes.
UK Power Networks	N/A	N/A
EDF Energy	6 per new MC	If the approach of new Measurement Classes and Consumption Component Classes were to be introduced, it would be sensible and more future-proofed to have 6 Consumption Component Classes separately for each new Measurement Class, as for Import
SmartestEnergy Limited	Set of Six	This very conundrum is a very clear example demonstrating that what was envisaged as a simple modification is now going to be overly complex or may not deliver all of the functionality that some parties require. Our view is that the three new Measurement Classes sharing a single set of six Export Consumption Classes is the way forward on the grounds of simplicity. We recognise that the Distributors would not be able to identify whether the data was against a domestic house or an Industrial premise in this case, but it is inappropriate to have an even more complicated solution which would create extra work for all Industry participants, of which the cost and

Respondent	Response	Rationale
		benefits case is not fully understood. For example, Suppliers may bear the resulting cost of the SVAA changes.
British Gas	Other	We are still not convinced by the argument that 3 new measurement classes are required. Currently for HH elective we have 1 measurement class and Duos charges are allocated by LLFC. Currently the CDCM includes 2 tariffs for NHH export both of which are single rate therefore we the solution as defined for export appears overly complex.

Question 3: Do you agree that all HHDAs should be required to support the new Measurement Classes?

Summary

Yes	No	Neutral/Other
12		1

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	Allowing this to remain optional would cause erroneous data issues where an HHDA who could not support the new Measurement Classes was appointed and increase the level of complication in the industry.
Electricity North West	Yes	Whilst the initial thoughts where to minimise the impact on Party Agents to only being impacted by their use, the consultation feedback was very supportive of mandating the HHDA to be ready to support at the time of implementation. We are therefore happy to accede to such a request.
GTC	Yes	We agree with the working groups' assessment that there is sufficient complexity that HHDA's should be required to support the new measurement classes.
Imserv Europe Ltd	Yes	For consistency and ease of implementation, we believe these new MCs should be supported by all HHDAs
Northern Powergrid	Yes	This will ensure they have the system functionality already in place should they be appointed to a Metering System with one of the new Measurement Classes
ScottishPower	Yes	Given that the group have already identified that optionality would introduce significant complexity into the market, then it seems sensible to mandate that all HHDAs should support the new Measurement Classes. In addition as the likely use of the new Measurement Classes grows over time as new metering technology is introduced it is very likely that no HHDA will be untouched by the move to utilise HH data going forward. We would also refer to our previous response relating to Aggregation Rules for D0040 (Loss Adjusted) which differ from that of D0030 (not Loss Adjusted).

Respondent	Response	Rationale
E.ON	Yes	In the NHH arena there are more amendments at later settlements (R3-RF). If an MPANs responsibility has moved through a change of NHHDC Agent, then currently the responsibility to correct the settlements moves from one NHHDC to another NHHDC although the NHHDA for each period will remain the same. Each NHHDA would need to be able to aggregate the settlement data for the MPAN no matter which Measurement Class the information is submitted on.
SSE PLC	Yes	Industry benefit. Gives the customer more choice.
RWE npower	Yes	A single approach by all HHDA's would remove complexity in providing data to relevant parties.
UK Power Networks	N/A	N/A
EDF Energy	Yes	Notwithstanding our concerns about this proposal, if it were to be implemented we agree that all HHDAs should have capability to support the new aggregations and dataflows/data structure. This would help avoid exceptions and resource-intensive corrective actions, for example in the case where a supplier specifies one of the new measurement classes for a site which their HHDA is not able to process.
SmartestEnergy Limited	Yes	We cannot support this modification proposal if it is imposing change and costs on suppliers, data aggregators, data collectors, and the supplier volume allocation agent, when the natural solution is simply for more site specific billing from DNOs. Having said that, if this modification is to be approved it makes sense to us that all HHDAs should support the new measurement classes. There should also be some guidance on the scenarios where the new Measurement Classes would be used over Measurement Class E, for example.
British Gas	Yes	Optionality would appear to add unnecessary complexity.

Question 4: What are your views on each option?

Responses

Western Power Distribution

WPD does not intend to use the billing data for network planning purposes. We use the D0010 for HH meters and in the case of smart meters we intend to make ad hoc requests for data for specific MPANs via the DCC. WPD does not wish to receive data that we will not bill on but are obliged to keep. We believe this will make most of our reporting signif-icantly more complex and result in most of our internal reports needing to be re-written to ignore the D0036 data for the new Measurement Classes, as well as re-writing parts of our billing system, in order to receive and store data that we have no intention of using.

The above should have no impact on the current use of the D0010 for HH metered MPANs.

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons

1	"Tick"			
2		"Tick"		
3			"Tick"	
4			"Tick"	
5			"Tick"	
Alternative Option				

Electricity North West

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No			
2	Yes		Option 5	
3	No			
4	No			
5	Yes (see Q6)			
Alternative Option				

We believe that we need to receive some form of raw data for planning and validation purposes. We would prefer to receive the D0010s rather than HH data in line with the pros/cons contained in the consultation. Our second choice would be to receive a new flow but since this is at HH intervals and not used for billing we suspect that this may be challenged certainly on Measurement Class F.

Any utilisation or manipulation of the existing D0036/D0275 flows should be avoided. The validation issues placed on distributors and suppliers would far outweigh the introduction of a new flow or the use of an existing D0010 flow.

The whole issue of receiving HH data for domestic customers is still to be determined. From a distributor perspective we have to prove the case for data at this level.

The government stance is shown below from an extract of the privacy consultation document:

"the Government therefore proposes that network operators should be required to develop more detailed plans to explain what level of data would be accessed, for which purposes, and how privacy concerns would be addressed, and submit these plans for approval. In developing their plans, network operators would be encouraged to consider a full range of options, which might include anonymisation or aggregation of data, use of sampling and other possible approaches".

It is thought that this data would come direct from the DCC by request so perhaps we should be discouraged from seeking such data from existing, new or amended data flows until more information is known especially in the proposed Domestic Measurement Class.

GTC

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1				
2				
3				
4				

5				
Alternative Option				

Imserv Europe Ltd

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1				
2	Yes			
3			Yes	
4				
5				
Alternative Option				

As we are agent, we have simply made our choices on ease of implementation and level of change required. We estimate the changes to be low impact c £20k to implement the most costly option for us. This is the estimated cost to make the changes to our systems to accommodate the new flows only.

Northern Powergrid

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No	Yes	Option 2	
2	Yes	No	Option 5	
3	No	Yes (due to potential risk of generating a site specific bill and aggregated bill for the same customer)	Option 2	
4	No	Yes (due to potential risk of generating a site specific bill and aggregated bill for the same customer)	Option 2	
5	No	No	Option 2	
Alternative Option				

ScottishPower

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	X			
2		X		
3		X		
4		X		
5		X		
Alternative Option				

Given the proposed draft new Electricity Distribution Licence we believe that this is the only viable way forward as it will meet the licence condition restriction with regard to only receiving aggregated data. This also avoids as stated the complexity around huge flow volumes that could not be used on a practical basis for Network Planning or Aggregation Checks. We assume this will be covered within Settlement Validation checks such as GCF returns. We also assume that data sets will be developed through the discussions within the ENA relating to Network Management data requirements.

E.ON

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1			x	
2	x			
3		x		
4		x		
5			x	
Alternative Option				

SSE PLC

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		x		
2		x		
3		x		
4		x		
5	x			
Alternative Option				

See the other options as being unacceptable.

RWE npower

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No			
2	No			

3	Yes			
4	No			
5	No			
Alternative Option				

We prefer option 3 as it offers no change to existing flow structure with minimal change to Suppliers validation processes.

UK Power Networks

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		This is worse than the “as is” position.
2	Yes			A D0010 based on a calendar month’s data would probably be acceptable but our preference would be for daily D0010, subject to other regulatory intervention.
3		Yes		Would be billed by our existing system
4		Yes		Would result in system change
5			Yes	Cleaner solution to Half Hourly data
Alternative Option				

EDF Energy

No view given

SmartestEnergy Limited

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		
2			Yes	
3	Yes			
4		Yes		
5		Yes		
Alternative Option				

Clearly we would only be able to support any option which leaves suppliers who do not wish to be a part of this unaffected. However, we are concerned that the clear distinction between half-hourly and non-half-hourly is being eroded in ways which are not fully understood. Furthermore, the pros and cons of the options do not appear to be objective or balanced. For example, Option 3 (Using existing D0036/D0275 data flows for both old and new Measurement Classes), would present the least impact for Suppliers and Agents. However, there is only one 'Pro' listed, against five 'Cons', all of which are made to look as if they would inconvenience the Distributor in some way. When examining the 'Cons' listed in Option 3 more closely, we would raise questions as to whether they are genuine disadvantages; which RIGS reports are being referred to in this section for example, and does it matter (since P280 itself will be referred to Ofgem) that a change to RIGS would require Ofgem approval? It is also unclear why an increase in daily data flow traffic would be deemed as a negative, (or how thoroughly this has been quantified). The last 'Con' states there is no means of identifying whether the data in the flow will be billed by the Distributor on a site specific or aggregated basis. However, surely the old and new Measurement Class in the flows itself would provide this.

British Gas

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		
2		Yes		
3	Preferred Option			
4			Yes	
5			Yes	
Alternative Option				

As a supplier we would prefer option 3

Question 5: What do you believe are the impacts of the prohibition on obtaining and using consumption data within the Smart Metering - data access & privacy - draft distribution licence condition (see pg 79) published by DECC?

Responses

Respondent	Response	Rationale
Western Power Distribution		WPD believes that this supports the view that D0036/D0275 data should not be sent, as the proposals allow for the data to be used when it is in aggregate form.
Electricity North West		The privacy issue is predominantly surrounding personal data which therefore relates to Domestic consumers. Some extracts from the document referenced in the question are: "One of the key areas coming out from the call for information last year was the need for flexibility in the data access and privacy framework to accommodate

Respondent	Response	Rationale
		future changes in the energy market (for example, on settlement)"; also "Industry participants have already recognised the potential for smart metering to improve the accuracy of the gas and electricity settlement arrangements. The industry is considering the case for moving to greater use of half-hourly meter readings for electricity settlement in future". "Broad support was expressed for industry's work on a move away from profiling to actual half-hourly settlement in future, and it was felt that use of data for settlement purposes should be determined by results of this work". "In light of any decision on a change to more frequent settlement, which would require significant regulatory changes, the position on use of half-hourly data for settlement purposes should be reviewed". The work undertaken by Elexon on PC1-4 customers moving from NHH to HH and the work undertaken here is, in our opinion, a continuation of further work in this area and builds on the feedback from the industry associated with this cost benefit analysis and the work undertaken by DCUSA under DCP103. We recognise the concerns over use of personal data and as such see Settlements resulting in aggregated data for domestic customers derived from the actual HH daily data as an acceptable approach but we must guard on suppliers and distributors receiving the raw data via the back door thereby breaching the Supplier Licence condition identified on page 79 of the referenced document. The approach we have adopted allows for an opportunity to start the process of moving from NHH to HH, by the introduction of the three Measurement Classes being made a available to the industry as and when suppliers wish to utilise them (a facilitation modification). Since one of the Measurement Classes is specific to Domestic, we can ensure that such raw data is not passed on, hence the call for the D0010s that would satisfy the Supplier Licence Condition and initially distributor requirements until they provide sufficient evidence to support raw HH data and have aggregated software in place that satisfies any conditions in this area. Whether this is the approach for all the new Measurement Classes is up for debate in this consultation. Albeit we believe it is a sensible approach to receive the D0010s we have been concerned over the significant monthly/quarterly data flows that this would generate on specific days. We believe that the solution may be that when the supplier requests a reading from the meter in order to bill the customer, this information is passed to both the supplier and distributor via a D0010. This could smooth the process over the supplier billing cycles and provide us with a similar data flow timetable as is the case now in the NHH market. This has its drawbacks in that it will still be difficult to validate the aggregated data but does improve the process by receiving actual consumption data on a regular basis for all customers whereas presently we may not receive data for some

Respondent	Response	Rationale
		customers due to access constraints or differing reading cycles (quarterly, six monthly or annually).
GTC		This question appears to be out of scope of P280. We do not believe that this will impact this change.
Imserv Europe Ltd		This does not impact us however we understand from the Licence Condition that the DNO would have to demonstrate that data would not be used in such a way as to enable identification of a Domestic Customer.
Northern Powergrid		Impacts on the prohibition on obtaining and using consumption data within the Smart Metering would be: - Lack of accurate information to carry out the billing of DUoS charges; - Continued losses volatility leading to potential increase in disputes; - Inability to efficiently carry out network investment; - Inability to identify whether meters and their communication links are working correctly; - Inability to identify and prevent energy theft
ScottishPower	Yes	Impact will mainly be on Measurement Class F – Domestic. Without approval by the customer it will not be possible to receive D0036/D0275 flows as they are mpan specific. This also supports the view that D0030 and D0314 is the only real option available to DNOs for receiving DUoS Billing data. There must be no risk of partial data being available (e.g., one customer not giving permission for individual MPAN data throws out the whole system and undermines the principles and purpose behind the Proposal
E.ON	Yes	• If the customer does not allow us to retrieve HH data, we cannot bill/settle on a HH basis • As per DECC doc, customers will have to opt in (will be done through Ts & Cs). Non-dom opt out. We will need opt out to extend to domestic. • The supplier license conditions means a domestic customer could withdraw their consent for us to obtain consumption data at any time; in this instance would we have a mandatory obligation to Downgrade?
SSE PLC		The opt-In/op-out provisions within the Smart Energy Code, could result in the data access and metering arrangements changing frequently between being settled via half-hourly settlement routes and non-half-hourly settlement routes. Consequently, this may result in an increase in the cost of data management and may cause problems with accuracy and settlement of the whole domestic electricity market, including Group Correction Factors and residual profiles (should the customer never decide to allow half hourly data usage). By prohibiting suppliers from accessing more granular data, future benefits cannot be universally provided, which will impact on the overall objectives of the Government's green agenda and the real value of Smart will not be realised.
RWE npower	N/A	No comment
UK Power	No	N/A

Respondent	Response	Rationale
Networks		
EDF Energy	N/A	N/A
SmartestEnergy Limited		This question in relation to the data access and privacy draft licence condition is confusing because, as previously highlighted, it is not clear whether (or where) this consultation is referring to NHH or HH. The prohibition on obtaining and using consumption data refers to the 'Domestic' customer throughout the relevant section of the data access and privacy consultation document. It is not obvious as to why this paper is referenced in relation to P280, unless there are going to be some limitations on the data which can be used for aggregated billing purposes. This again requires clarification. If this is purely for the use of proposed new Measurement Class 'F', then we would reiterate the point made in Question 3 namely the need for guidance on the proposed use of this code over Measurement Class E, and of meeting the objectives set out in P272.
British Gas		We are disappointed with the current policy decision taken by government since we believe that information pertinent to a specific customer, presented well, can deliver high levels of engagement and highlight opportunities for consumption reduction. We are, however, satisfied that the Government has given this question due consideration, taking account of all stakeholders' requirements, and that it is unlikely to change unless there is clear evidence (e.g. from trials) that this is merited. British Gas will therefore continue with comprehensive trials of Personalised Energy Efficiency Advice during Foundation stage of smart meter roll-out.

Question 6: Where the preferred option allows should participants have the ability to opt in/opt out of receiving data or should it be mandatory that data is sent?

Responses

Western Power Distribution

The ability to opt in could potentially cause delays in receiving data where, for example, a customer switches from a supplier who does not use the data to a supplier that does or vice versa, which would cause issues for suppliers trying to validate bills. This may increase the burden on DNOs with regard to bill queries. That said, if the chosen way forward is to use D0030s and not D0036s/D0275s then this issue is less significant.

Electricity North West

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No	N/A	N/A	
2	Yes	Opt in for MC F&G. Opt out for MC H		

3	No			
4	No			
5	Yes	Opt in for MC H only, Opt out for MC F &G		
Alternative Option				

The opt in/opt out provision is designed to allow flexibility for various requests from industry parties. The level of flexibility needs to be determined. Is it by Measurement class of by data flow?

Our preferred solution would be at Measurement Class level, where we would like to receive D0010s for Measurement Class F & G for all the reasons indicated above.

However, we believe for Measurement Class H customers it is better to receive the HH data flow. Measurement Class H customers are not domestic, therefore in our view, not being impacted by the privacy issue; and similar customers on Measurement Class E have HH data provided.

It also allows the distributor to calculate the capacity value in order to manage the network and ensure that the customer, through the National Terms of Connection, do not exceed the agreed capacity between them and the distributor. The D0010 cannot provide such data since the source data is HH rather than a MD register.

If it is not cost effective to deliver at Measurement Class level then it is questionable whether we should have the ability to opt in/ opt out at data flow level apart from where data has effectively duplicate flows (D0036 or D0275 but perhaps no need to receive both).

If opting in and out is not justifiable we would then prefer to receive the D0010s for all the three Measurement Classes albeit some benefit in the use of the data would be lost (i.e. for capacity calculations), but it does prevent any concerns over privacy and is better than no receipt of data as identified in Option 1 earlier.

GTC

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	X			
2				
3				
4				
5				
Alternative Option				

We believe that option one will avoid any double charging scenarios and we do not require any additional data flows in order to bill. Where any other option is chosen we believe that it should be mandatory, in order that distribution businesses can comply with the RIGs requirements. In our experience where the sending and receiving of data is not mandatory, it can be difficult to resolve any issues with receipt, data quality etc…

Imserv Europe Ltd

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1			Mandatory	
2			Mandatory	
3			Mandatory	
4			Mandatory	
5			Mandatory	
Alternative Option				

Rather than having to cater for who has opted in / out, we believe for ease of implementation that all options should be mandatory

Northern Powergrid

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No	N/A	N/A	
2	Yes	No	Yes	
3	No	Yes	No	
4	No	Yes	No	
5	No	Yes	No	
Alternative Option				

Option 2 ensures parties receive the D0010 and can choose whether this is received monthly/quarterly for validation purposes. This option also mitigates the risk of double billing as well as impact on parties to develop IT systems to avoid generating a site specific bill for new Measurement Classes if either Option 3 or 4 is preferred.

ScottishPower

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	X		X	
2				
3				
4				
5				
Alternative Option				

For the reasons stated earlier, we believe that whatever Options are chosen, they must be Mandatory i.e. Opt-Out should be not considered viable.

E.ON

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1			x	

2			x	
3		x		
4		x		
5			x	
Alternative Option				

- This will be driven by what comes out of the license

SSE PLC

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3				
4				
5	x			
Alternative Option				

There should be a common process for all parties which should be mandatory on our preferred option.

RWE npower

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No			
2	No			
3	Yes	No	Yes	
4	No			
5	No			
Alternative Option				

Making it mandatory would be good for the market

UK Power Networks

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3				
4				
5				
Alternative Option				

We would wish to receive the data

EDF Energy

No view given

SmartestEnergy Limited

Should P280 be implemented, then whichever option is settled upon should be mandatory for all parties to avoid inconsistency of processes and possible exceptions. Requirement 6 of the consultation document; 'Amending the HHDC-LDSO data flow', states that it is possible that the Suppliers may want one option, whilst Distributors may favour another. This presents further ambiguity over how a decision will be made. A further option of changing the Distributors' billing systems altogether to remove the burden on Industry participants to change their systems and processes, should also be investigated.

British Gas

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3		Yes		
4				
5				
Alternative Option				

Question 7: Do you have any further comments on P280?

If you responded to the initial P280 consultation, please note here any changes to your views from those in your previous response.

Summary

Yes	No	Neutral / Other
	No	

Responses

Respondent	Response	Rationale
Western Power Distribution		N/A
Electricity North West		No
GTC	N/A	N/A
Imserv Europe Ltd	N/A	N/A
Northern Powergrid	No	No
ScottishPower		The views expressed by ScottishPower remain as stated in our earlier responses. In particular, we have concerns regarding the description of each new MC (whole v current metering) and also the definition of

Respondent	Response	Rationale
		the Aggregation rules within D0040 (presently Loss Adjusted but DNO's require unadjusted figures on the resulting D0030/D0314 Flows. If the new measurement class descriptions remain as they are at present both ScottishPower and Manweb Distribution would be required to introduce new LLFCs with regards to Measurement Classes F and H because it is not possible to use the existing LLFCs within PC 5-8 as they cannot identify whether an AMR meter is either whole current of CT Metered. However we understand that there is a (another) separate industry group looking at this issue with regard to the introduction of new DUoS tariffs. In addition, while we recognise that the purpose of the Modification is to give Suppliers a choice of Measurement Class going forward, has the Group considered the cost impact that may be incurred to utilise these new Classes. E.g. Change of Measurement Class, metering, agent costs etc. It may be that such costs provide a barrier to moving to the new classes which could in effect mean that the new Measurement Classes are redundant before they are implemented. A final point, given that there are a number of Industry Groups all working towards a similar solution it may be sensible for those groups to get together to see if a common solution could be developed.
E.ON		• On the face of it, P280 appears to be more cost effective than P272. • If DCC holds all data in centralised location, the data protection/supplier issue becomes irrelevant? Can aggregate at supply point level • Our other concerns are around impacts on import export metering - if a customer chooses to use different import/export suppliers, would matching Measurement Classes be used? How would aggregate import/export Mpans? How would it work if, for instance the import & export supplies have different measurement classes (EG NHH on the import but HH on the export)?
SSE PLC	Yes	If this MOD is approved we would want to see that measurement class E is removed.
RWE npower	No	
UK Power Networks	No	-
EDF Energy	Yes	In respect of BSC Objectives, the only benefit of this proposal appears to be a reduction in the volume of data reported to DNOs for the purposes of DUoS billing, compared with current site-specific data. While the reduction in volume might have practical benefits in reducing some communication charges, this direct benefit is probably quite small. All other benefits appear to be in the realm of DUoS charging, either within DNO companies, or in the handling of DUoS bills by Suppliers. The link between these benefits and the BSC objectives is not clear.

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		The cost for EDF Energy to implement this proposal would be considerable. Increases in the number of sites settled half-hourly are expected to remain relatively low for several years. Until a larger infrastructure is in place throughout the industry to handle the increased data volumes in the end-to-end supply process, and consumer products are developed that deliver benefits from half-hourly settlement, the overall benefits could be small. The rollout of smart metering and expected future developments in DCC processing, and probable more fundamental changes to settlement towards the end of the decade, could make this proposal P280 redundant, and expenditure on it could turn out to have been wasted if benefits do not materialise quickly. The cost-benefit return period for this proposal might be too long to justify making expensive changes with limited life.
SmartestEnergy Limited	Yes	We are concerned about interactions with P272 which is a proposed mandatory change to avoid cherry picking, and which does not seek to muddy the current arrangements but to operate under the established HH processes. We believe that the uncertainty around the impact to P272 presents a risk in itself, and that use of Measurement Class E may gradually diminish following implementation of P280. P272 mandates that everything on a Profile Class 5-8 would be settled Half-Hourly. However, by introducing three new codes which are open to interpretation by the supplier, this modification would present a risk to P272's objectives. Finally, P280 is described as a 'facilitation consultation', and optional for suppliers. However, if we were to 'opt out' of using the proposed new Measurement Classes, and subsequently attempted to gain a customer whose previous supplier had elected to use one, then we may experience difficulty in registering that site. With this in mind, our view is that P280 is potentially anti-competitive, and therefore against the BSC Objectives.
British Gas		British Gas supports the principle of elective HH settlement however we recognise the potential for gaming by suppliers which could place costs unfairly on other suppliers. We would recommend that Elexon reviews this in parallel with the proposed changes that have been raised. Suppliers should not be prevented from moving customers across to HH settlement where contracts have been agreed relating to Time of Use tariffs or customers have particular load patters which would not be allocated in a cost reflective manner under the current profiling regime.