



Change Proposal Circular:

CPC00706: Impact Assessment of CP1360, CP1361, CP1362, CP1363 and CP1364

Responses for CP1363 'Addressing Settlement Data Adjustments in a Balanced Manner'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	Yes	60
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	No	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	No	Yes	90
Npower	Supplier and Supplier Agents (NHH & HH)	No	Yes	360
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Neutral	Yes	90
British Gas	Supplier	No	Yes	120

Detailed Impact Assessment Responses

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	-
Imserv Europe Ltd	Yes	Yes	<p>Agree change comment - The proposed solution seems to place an obligation on Suppliers - yet it is proposed to include it within BSCP504, thereby placing the obligation on NHHDCs?</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Potential changes to reporting and extra training to address "settlement data adjustments" in a more balanced manner</p> <p>Lead time comment - Change some scripts/reports and some extra training</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our costs</p> <p>Associated costs comment – Not yet quantified – but anticipated to be small</p>
Lowri Beck Services Limited	Neutral	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes.</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	No	Yes	<p>Agree change comment - Although this seems to be a laudable requirement we do not feel that it is possible to work in this manner given that we have to treat customers in an equitable manner. For the avoidance of doubt we believe this CP has potential for Suppliers to be in breach and as such is not acceptable.</p> <p>If in particular period we can only resolve those issue related to high negative values and not any with high positives then we have to fix those, which would then seem to go against this CP. As such we think this is something that can only be accepted as a best practice that will be followed were possible and not as a mandated method of operation. With that in mind we feel that change specified needs further caveats to ensure that this does not impact on timely manner of error resolution where it is not possible to achieve this equitable approach.</p> <p>For which role is your organisation impacted? Supplier and NHHDA</p> <p>Please state what the impact is - Managing data amendments</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None above those</p>

Detailed Impact Assessment Responses

			<p>impacts detailed in response to question 1.</p> <p>Any other comments - In any amended change we would like statement “volume of such errors” in proposed red-line text to be clarified. It currently isn't apparent which of the following approaches should be adopted:</p> <ol style="list-style-type: none"> 1. Under or over-settlements should be addressed based on the highest number of errors in each category 2. Under or over-settlements should be addressed based on their individual impact on settlements accuracy 3. Under or over-settlements should be addressed based on their cumulative impact on settlements accuracy
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – No costs involved</p>
SSE Energy Supply Ltd	Yes	No	-
Northern Powergrid	Yes	Yes	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is - See answer to Q2</p>
Siemens Metering, Communications & Services	No	Yes	<p>Agree change comment - Our support for these changes would depend on whether P274 is approved, as this would end the use of the GVC process. It seems unnecessary to make any changes relating to GVC, if the intention is to stop using this type of adjustment. Also, from a DC perspective, it is difficult to see how we could control this process, as our use of GVC is initiated by Suppliers.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Process Changes would be required.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact other than potential conflict with P274</p>
Npower	No	Yes	<p>Agree change comment - Npower does not agree with this change as we feel that Suppliers are not always in control of the reason a corrective technique may be used, for example if a corrective technique is used after customer contact (as referenced within</p>

Detailed Impact Assessment Responses

			<p>the Change Proposal). Whilst we would always hope that corrective techniques were used in a fair and appropriate manner, the use of these techniques is driven by business need and we feel it would be almost impossible to monitor the situation and audit it.</p> <p>For which role is your organisation impacted? Supplier & NHHDC</p> <p>Lead time comment - We feel that in order to allow a process to be created that would allow fair auditing and monitoring there would be a need for extensive work to be carried out by the industry and therefore would anticipate that the changes would not be able to implemented in line with the request of the raiser.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes – we do not believe that a solution can be developed in the time available for this to go live in the requested release.</p> <p>Associated costs comment – We are not in a position to provide implementation costs at present.</p> <p>Any other comments - We believe the additional work required to meet the new obligations set out within this Change Proposals is an unrealistic addition to a process that currently we feel is used in a manner to meet business needs.</p>
Scottish Power	Neutral	Yes	<p>Agree change comment - The change proposes re-enforcement of statements that are already clear within the wording of the BSC.</p> <p>For which role is your organisation impacted? Supplier, NHHDC and NHHDA</p> <p>Please state what the impact is - Internal process documents aligned with BSCP504 would need to be updated to include additional wording. However, there would be no impact on existing processes as the intent of the BSC section remains the same.</p> <p>Lead time comment - Allow internal documentation review and update.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
British Gas	No	Yes	<p>Agree change comment - This additional requirement is not necessary as Suppliers have an overarching requirement under the BSC to ensure settlement is accurate BSC Section U paragraph 1.2.1:</p> <p>“1.2.1 Without prejudice to any specific provisions of the Code relating to the accuracy and completeness of data, each Party shall ensure that and undertakes that all information and data submitted or otherwise provided by or on behalf of such Party to the Panel, any Panel Committee, BSCCo, the BSC Clearer or any BSC Agent pursuant to any provision of the Code or any Code Subsidiary Document will as far as reasonably possible be accurate and complete in all material respects.”</p> <p>We do not understand how BSCCO could monitor or enforce the following obligation:</p> <p>“the application of adjustments such as Gross Volume Correction (GVC), over- and under-statements of energy are addressed in proportion to the volume of such errors that require resolution”. We believe the proposed obligation is unworkable.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Suppliers should have the ability to correct errors within settlement. Our processes and</p>

Detailed Impact Assessment Responses

			procedures are built to identify errors which are then corrected by whichever means is appropriate under the BSC. We do not understand how system and process changes could be made to satisfy the obligation
--	--	--	---

No comments received on the redlined text.