

Meeting name Supplier Volume Allocation Group

Date of meeting 29 November 2005

Paper Title SVA CHANGE PROPOSALS FOR DECISION

Purpose of Paper For Decision

Synopsis This paper presents 3 Supplier Volume Allocation (SVA) Change Proposals that have been assessed in accordance with BSCP40 'Change Management', and requests agreement on their progression.

1. INTRODUCTION

- 1.1 The main body of this paper outlines 3 Supplier Volume Allocation (SVA) Change Proposals (CPs) that have been raised and have undergone an Impact Assessment (IA) by ELEXON, Parties, Party Agents and Balancing and Settlement Code (BSC) Agents, as appropriate. They are being presented for agreement on their progression.
- 1.2 In light of the IAs carried out, a decision is now sought as to whether the CPs should be approved, rejected, withdrawn or revised in accordance with ELEXON's recommendations.
- 1.3 Section 2 of this paper contains a summary of each CP. Appendix 1 contains a detailed breakdown of implementation costs. A more detailed analysis and a Summary Table of Participant IA responses are contained in Appendices 2 - 4.

2. CHANGE PROPOSALS FOR CONSIDERATION

2.1 CP1149 – NHHDA software does not support reporting to Suppliers of the changes resulting from an SMRS refresh

- 2.1.1 CP1149 was raised on 6 October 2005 by ELEXON.
- 2.1.2 There is a requirement in BSCP505 'Non-Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS' and PSL140 'Non Half Hourly Data Aggregation' for a Non Half Hourly Data Aggregator (NHHDA) to provide a report to each relevant Supplier detailing changes made to the NHHDA database following a full refresh of Supplier Meter Registration Service (SMRS) data.
- 2.1.3 Currently it is difficult for NHHDA's to obtain the required information from the NHHDA system. Although an audit log report can be produced to show the changes made to the system, it is not split by Supplier.
- 2.1.4 The two options proposed by the CP were to remove the requirement from BSCP505 and PSL140 (option 1) or to update the NHHDA software to produce a report split by Supplier (option 2).
- 2.1.5 Of the 10 respondents to the participant Impact Assessment 6 agreed with option 1, 2 agreed with option 2, 1 agreed with both options and 1 disagreed with both options.
- 2.1.6 The cost of implementing CP1149 option 1 is estimated at £2,640. The total cost of implementing CP1149 option 2 was initially estimated at around £65,000. The service provider

has subsequently indicated that there are flaws with the original solution and the implementation cost is likely to be higher than that originally estimated.

- 2.1.7 ELEXON issued guidance to the industry in October 2000, stating that NHHDA's may reach agreement with Suppliers, prior to applying the Full Refresh, that a letter providing a synopsis of the updates performed will be sufficient. Due to the strength of argument against option 1, it is proposed that a new version of CP1149 is created to include a new option, which would involve formalising the guidance given by ELEXON in BSCP505.
- 2.1.8 ELEXON's recommendation is that a new version (version 2) of CP1149 is drafted and issued for participant impact assessment.

2.2 CP1150 – MDD Registration Principles

- 2.2.1 CP1150 was raised on 6 October 2005 by ELEXON.
- 2.2.2 BSCP509 'Changes to Market Domain Data' is currently unclear as to when a new BSC Party or Party Agent should register their details in Market Domain Data (MDD). This has caused problems for new entrants in the past.
- 2.2.3 ELEXON and the Entry Process Agent have now defined a number of principles for registering in MDD, and CP1150 proposes to introduce them into BSCP509.
- 2.2.4 All 9 of the respondents to the participant impact assessment supported the CP.
- 2.2.5 The implementation cost for CP1150 is estimated as £1,760. It is believed that the benefit to new entrants of incorporating these MDD registration principles into BSCP509 outweighs the implementation cost.
- 2.2.6 ELEXON's recommendation, based on the unanimous support to the participant Impact Assessment is that CP1150 should be approved for inclusion in a future BSC Systems Release. The target release is the June 2006 Release.

2.3 CP1151 – Late Comment on Clarity of the P183 changes to BSCP504 Step 3.2.6.8'

- 2.3.1 CP1151 was raised on 25 October 2005 by ELEXON.
- 2.3.2 This CP proposed to clarify the changes to BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' introduced by Code Modification P183 'Additional Mechanisms for Obtaining a valid Change of Supplier Reading'. The drafting of BSCP504 is unclear and may not allow the NHHDC to provide an Old Supplier Estimated Read (OSER). This would undermine the intention of P183.
- 2.3.3 All 8 of the respondents to the participant impact assessment supported the CP.
- 2.3.4 The implementation cost of CP1151 is estimated as £440. It is believed that the removal of ambiguity from BSCP504 will justify this cost.
- 2.3.5 ELEXON's recommendation based on the participant impact assessment responses is that CP1151 is approved for inclusion in the CVA/SVA February 06 Release.

3. RECOMMENDATIONS

3.1 The SVG is invited to:

- a) **AGREE** that a new version of CP1149 should be drafted and issued for participant Impact Assessment;
- b) **APPROVE** CP1150 for implementation in the next suitable BSC Systems Release; and
- c) **APPROVE** CP1151 for inclusion in the CVA/SVA February 06 Release.

Tom Cash

ELEXON Change Delivery

List of enclosures

Appendix 1 – Detailed Cost Breakdown

Appendix 2 – Detailed Analysis of CP1149 and IA responses

Appendix 3 – Detailed Analysis of CP1150 and IA responses

Appendix 4 – Detailed Analysis of CP1151 and IA responses

Appendix 1 – Detailed cost breakdown**Cost of Adding to a Planned Release**

	Service Provider		Other Demand Led		ELEXON Operational ¹			Total	Other Impacts
	Cost	Tolerance	Cost	Tolerance	Man days	Cost	Tolerance		
CP1149 Option 1	£0	N/A	£0	N/A	12	£2,640	+/-10%	£2,640	N/A
CP1149 Option 2	£37,000 ²	0%	£22,000	N/A	27	£5,940	+/-10%	£64,940 ²	N/A
CP1150	£0	0%	£0	N/A	8	£1,760	+/-10%	£1,760	N/A
CP1151	£0	N/A	£0	N/A	2	£440	+/-10%	£440	N/A

¹ A Planned Release will typically have an associated ELEXON Operational cost of between 55 man days for a documentation only release up to 350 man days for a large software release. This cost will be apportioned across the constituent changes.

² This estimate is no longer valid and it is expected that the actual cost would be higher.

APPENDIX 2 – DETAILED ANALYSIS OF CP1149 – ‘NHHDA SOFTWARE DOES NOT SUPPORT REPORTING TO SUPPLIERS OF THE CHANGES RESULTING FROM AN SMRS REFRESH’

BSCP505 ‘Non-Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS’ describes the requirement for NHHDA to perform a full annual refresh of SMRS data. Included in this process is an obligation on the NHHDA to compare the new data (as contained in the SMRS refresh file) with the old data (as stored on the NHHDA database prior to application of the refresh).

The requirement to report to Suppliers any differences in old and new data is also contained in PSL140 ‘Non Half Hourly Data Aggregation’:

“Upon receiving a Full Refresh, the Non Half Hourly Data Aggregator shall perform a comparison of the old and new versions of the relevant data and shall report on the differences (if any) between them to its Associated Supplier.”

ELEXON has in the past issued the following advice on the interpretation of this requirement³:

“The NHHDA must then send a unique file to each Supplier, highlighting the data differences for Metering Systems registered to that Supplier. Alternatively, NHHDA may reach agreement with Suppliers, prior to applying the Full Refresh, that a letter providing a synopsis of the updates performed will be sufficient”.

The refresh reporting facilities provided by the NHHDA system do not readily support this requirement. Although the system produces a Refresh Processing Log documenting the changes made to the database, this is not split by Supplier, and there is therefore no simple way for the NHHDA to extract the portion of the log relevant to a given Supplier.

This issue does not affect the Half Hourly market, as BSCP503 ‘Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS’ and PSL150 ‘Half Hourly Data Aggregation’ do not contain an obligation for Half Hourly Data Aggregators to report data changes to Suppliers.

Two possible solutions to this issue were proposed in the CP:

- Option 1 is to remove the requirement from BSCP505 and PSL140. It could be argued that this is simply formalising the advice already given by ELEXON (see above), which allows the Supplier and NHHDA to agree that a full file of data differences is not required.
- Option 2 is to amend the NHHDA software to include the Supplier Id for each data change reported on the Refresh Processing Log, so that the report can be split by Supplier.

Of the 10 respondents to the participant impact assessment, 6 agreed with option 1, 2 agreed with option 2, 1 agreed and had no preference between the options and 1 disagreed with the change. The two respondents who agreed with option 2 disagreed with option 1. The respondent who disagreed with the CP believed that the process was currently flexible enough to allow the requirement to be met. The two respondents who supported option 2, believed that removing the requirement from BSCP505 and PSL140 would have a detrimental effect on the quality of data.

The cost of implementing CP1149 option 1 is estimated at £2,640. The total cost of implementing CP1149 option 2 was initially estimated at around £65,000. The service provider has subsequently indicated that there are flaws with the original solution and the implementation cost is likely to be higher than that originally estimated. Due to the lack of industry support for option 2, a reassessment has not been requested from the service provider.

³ ‘Trading Stage 2 News Bulletin’ Issue 22, October 2000

Due to the strength of argument against option 1, it is proposed that a new version of CP1149 is created to include a new option (option 3), which would involve formalising the guidance given by ELEXON in BSCP505. This would ensure that the requirement was not removed entirely, and that Suppliers will be made aware of when changes are being made to the NHHDA database and what those changes are.

The new version of the CP would be sent out for participant impact assessment and the results would be presented to the next meeting of the SVG.

ELEXON's recommendation is that a new version (version 2) of CP1149 is drafted and issued for participant impact assessment.

IA Summary for CP1149

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
CP1149	NHHDA software does not support reporting to Suppliers of the changes resulting from an SMRS refresh	CPC00532	10 responses; 6 agreed with option 1, 2 agreed with option 2, 1 agreed with both options, 1 disagreed. The respondents reflected a general cross section of industry.	BSCP505, PSL140 and NHHDA software for option 2 only

IA responses for CP1149

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; 3.7	✓		Agree Comments: We support option 1 Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? Option 1	Noted.
Siemens Energy Services Ltd	✓		Agree	Noted.

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			Comments: Strongly support Option 1 - remove the requirement from BSCP505 / PSL140. Impact on Organisation's Systems and/or Processes: Yes Implementation Notification Required: 90 Days Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? Strongly support Option 1 - remove the requirement from BSCP505 / PSL140. Option 2 would require changes to the NHHDA software. These would be expensive to design, test and implement and of questionable value. Justification: Industry has managed perfectly well up to now without NHHDA's being able to issue a full file of data differences. Our experience is that the changes to data in the NHHDA system deriving from loading a full refresh file have practically no impact on the quality of the data held in NHHDA. The impact in terms of % Energy performance, number of Default EAC's and total mpans and energy included in the D0041 files appeared to be negligible. In our view, any file of data	

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			differences that would be produced if NHHDA were changed would not be used anyway, because there would probably be no discernible benefit to data quality.	
Centrica	✓		Agree Impact on Organisation's Systems and/or Processes: No Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? We are supportive of Option 1.	Noted.
EDF Energy, Supplier response	✓		Agree Comments: It is not currently possible (or at least simple) for NHHDA to be able to comply with the current requirements so a change is required in this area. Impact on Organisation's Systems and/or Processes: Yes Implementation Notification Required: 60 Days Comments: For NHHDA to test and implemented new version of software. Questions:	EDF are indifferent to CP1149, and would just require appropriate notice before any changes are made.

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			Which of the proposed implementation options do you favour, Option 1 or Option 2? We have no preference.	
YEDL & NEDL (CE Electric UK)	✓		Agree Comments: Please see choice of options Impact on Organisation's Systems and/or Processes: No Comments: No impact upon LDSO or SMRA systems Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? Option2 – upgrade NHHDA systems. Other Comments: We have a strong preference for option 2. Furthermore, we believe that option 2 should be strengthened. NHHDA software should to be upgraded to allow reporting of differences by supplier to individual suppliers. We also believe that the procedure should be strengthened by placing a requirement upon the supplier to validate the changes. The flaw in the current BSC procedure is that the supplier is not required to act upon the notification.	CE Electric believe that the reason for removing the requirement is not a valid one, and that by not have an obligation on NHHDA's to report back to Supplier leaves the Refresh Process incomplete.

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			If option 1 were adopted this will erode some of the value and purpose of requesting a full SMRS refresh. The refresh is the only means of closing the loop and ensuring that the supplier, SMRS and DA systems are aligned. SMRS are currently trying to resolve outstanding D0023 rejections of D0209 instructions. Some rejections can only be resolved via a full refresh where there are discrepancies and gaps in the historical data. Some DAs are already opposed to applying full refreshes to their database as it causes processing problems and is very cumbersome to perform. Although DAs are currently unable to fulfil the requirement due to technical constraints, this is not a valid reason to remove the requirement that, if adhered to, provides a useful aid in reconciling industry data that is often inconsistent. Discrepancies between the supplier, SMRS and DA systems cause imbalances in settlements and income if not corrected. Option 2 is the only way to enhance the accuracy of settlements.	
SAIC Ltd on behalf of Scottish Power UK plc; SP Manweb plc; ScottishPower Energy Management Ltd.;	✓		Agree Comments: ScottishPower supports this change, but only for Option 1. Impact on Organisation's Systems and/or Processes: No	Noted.

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
ScottishPower Generation Ltd.; ScottishPower Energy Retail Ltd.; SP Transmission Ltd.			Comments: If, as requested in this response the proposal Option 1 is selected, there will be no change to ScottishPower's systems or processes. Assuming Option 1 is selected across the industry then ScottishPower supports the recommended implementation in the next opportune release. Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? ScottishPower supports Option 1 Other Comments: ScottishPower does not see any merit in modifying the code for NHHDA in order to produce a report on differences for each Supplier. The report would not provide any additional information for the affected parties. Hence there is little or no value to be obtained from investing in this development.	
Npower Northern Ltd, Npower Northern Supply Ltd		✓	Disagree Reason: Npower do not feel that there is any case for removing the requirement from BSCP505 and PSL140 as the current wording is flexible enough to enable NHHDA's to report discrepancies to Supplier.	Npower have not changed their view that the current process is flexible enough to fulfil the requirement. i.e. through an informal process agreement with the NHHDA

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			For Option 2, npower support the idea of a standardised reporting format in principle, although would like to see the details of the proposed file to be able to assess the impacts on systems or internal processes.	and Suppliers. They cannot agree to option 2 without knowing more details of a proposed format of the information.
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd	✓	✓	Agree Option 2 Comments: Option 2 represents sensible change to facilitate better data quality and consistency at moderate central cost to industry of £37k. Disagree Option 1 Reason: Option 1 to remove requirement to check for consistency seems a retrograde step in facilitating data quality and consistency. Impact on Organisation's Systems and/or Processes: Yes Comments: Option 2 To integrate new report into existing processes. Option 1 has no impact. Implementation Notification Required: 90 Days Comments: Option 2 - To integrate new report into existing processes. Option 1	BE feel that the requirement should stay in the BSCP, and that removing it would be to the detriment of quality of data. Option 2 is a good solution for them, as it would mean a consistent level of service throughout industry in reporting data differences to suppliers. BE would need to know the exact cost of option 2 before it could be supported, as they noted that the cost could be greater than the 37k presented to industry in the CPC. If option 2 is not selected, then the preference would be to keep the current requirement where DAs and

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
			requires no notice. Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? Option 2.	Supplier reach an agreement to have the data supplied through a more informal route.
IMServ Europe Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: No Comments: Not if option 1 is taken forward Implementation Notification Required: 90 Days Questions: Which of the proposed implementation options do you favour, Option 1 or Option 2? We would prefer option 1. The reason for this is that there will be less impact on the current process	Noted.
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Cottam Development Centre Ltd, Enizade	✓		Agree Impact on Organisation's Systems and/or Processes: No Questions: Which of the proposed implementation	Noted.

Carried out by	Agree	Disagree	Comments	Lead Analyst Comments
Ltd, E.ON UK Drakelow Ltd, E.ON UK High Marnham Ltd, E.ON UK Ironbridge Ltd, Midlands Gas Ltd, Ownlabel Energy Ltd, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Western Gas Ltd			options do you favour, Option 1 or Option 2? Option 1	

APPENDIX 3 – DETAILED ANALYSIS OF CP1150 – ‘MDD REGISTRATION PRINCIPLES’

The Balancing and Settlement Code (BSC) and related Balancing and Settlement Code Procedures (BSCPs) do not make it clear at what point a newly registered BSC Party or Party Agent should register their details in Market Domain Data (MDD)⁴. BSCP509 ‘Changes to Market Domain Data’ details the processes involved but not when those processes should commence. The lack of clarity has led to complications in the registration process in the past.

Once a data item has been entered in MDD it can be difficult to remove it ‘cleanly’ if it is subsequently deemed to be incorrect. It is therefore important that registration details should not be entered into MDD until it’s been confirmed that the participant in question is entitled to register. In particular, the purpose of this CP is to define the conditions which must be met before:

- A Licensed Distribution System Operator (LDSO) can register ‘Market Participant Role’ data for the Distributor and SMRA roles;
- A Supplier or Supplier Agent can register ‘Market Participant Role’ data; and
- A LDSO can register ‘GSP Group Distributor’ or ‘SMRA Appointment’ data.

These issues were discussed at a meeting involving ELEXON and the Entry Process Agent. At the meeting a set of registration principles were defined and ELEXON agreed to present the principles to the Supplier Volume Allocation Group (SVG) for approval. The SVG noted the principles and requested that ELEXON investigate the issue in order to formally capture the principles in the relevant BSCP (SVG/48/011).

The registration principles that were noted by the SVG are detailed below. It is proposed that BSCP509 should be updated to reflect the changes detailed.

New Suppliers / Licensed Distribution System Operators (LDSOs)

In order for a new Supplier or New LDSO to register Market Participant and Market Participant Role data in MDD they must have completed the following steps:

- i) Acceded (Registered as a BSC Party); and
- ii) Qualified (Proven that they can interface with Central Systems).

The constraint that Suppliers are not permitted to register their Market Participant Id, Market Participant Role Code or Supplier Base BM Units in MDD prior to Qualification ultimately stems from Section A4.1.5 of the BSC, which prevents a Party's Registration Data from becoming effective in the Central Registration Agent (CRA) systems prior to the completion of "network access tests" and "business process integration tests". The MDD system has been designed to ensure that Supplier details can not become effective in MDD prior to the corresponding CRA registration (so that SVA metered volumes can always be assigned to a Trading Party), and the restriction stemming from section A4.1.5 of the BSC therefore applies in effect to MDD registrations as well. Provided that a New Supplier or New LDSO has fulfilled the above obligations, they will be permitted to register their details in MDD prior to Performance Assurance Board (PAB) approval. The purpose of the PAB approval for new Suppliers and LDSOs is to endorse the fact that they have completed Entry Process testing and have proven that they can successfully interface with the rest of the market, and that they are compliant with the BSC.

⁴ In the case of LDSOs, sections 3.1 and 3.2 of BSCP515 ‘Licensed Distribution’ do specify the point at which a newly-registered LDSO should register details in MDD. However, reflecting these rules in BSCP509 as well should reduce the risk of confusion.

Registration by LDSO to register that they are operating in a GSP Group

In order for an LDSO to register GSP Group associations (i.e. GSP Group Distributor and Supplier Metering Registration Agent (SMRA) Appointment data) in MDD they must have completed the following steps:

Acceded (Registered as a BSC Party);

- i) Qualified (Proven that they can interface with Central Systems); and
- ii) Have gained PAB approval (in accordance with BSCP511 'Entry Process – Supplier Meter Registration Service') that their SMRS has completed a Code Modification P62 'Changes to Facilitate Competitive Supply On The Networks Of New Licensed Distributors' -compliant entry process.

An LDSO must await PAB approval before registering GSP Group associations in MDD. The purpose of awaiting the PAB approval is to ensure P62 compliance. (Note that this does not apply to GSP Group Distributor and SMRA Appointment data registered in MDD prior to 1 August 2003, the Implementation Date of Code Modification P62).

New BSC Party Agents

In order for a new BSC Party Agent to register in MDD they must have:

- i) Completed Accreditation, i.e. gained approval from PAB (in accordance with BSCP531 'Accreditation') that they have completed Accreditation and Certification; and
- ii) Completed Entry Processes, i.e. PAB must have approved (in accordance with BSCP512 'Entry Process – Supplier') the entry process for at least one Supplier Hub including that Agent.

A new BSC Party Agent must await PAB approval before registering their details in MDD in order to ensure that no invalid Standing Data appointments are processed before the Agent has been given approval to participate in the market.

All 9 of the respondents to the industry impact assessment agreed with the change.

The implementation cost for CP1150 is estimated as £1,760. It is believed that the benefit to new entrants of incorporating these MDD registration principles into BSCP509 outweighs the implementation cost.

ELEXON's recommendation, based on the unanimous support to the participant impact assessment is that CP1150 should be approved for inclusion in a future BSC Systems Release. The target release is the June 2006 Release.

IA Summary for CP1150

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
CP1150	MDD Registration Principles	CPC00532	9 responses; 9 agreed	BSCP509

IA responses for CP1150

Carried out by	Agree	Disagree	Comments	Analyst's Comments
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		Agree Comments: Suggest MDD CRs could be submitted and held, pending PAB approval, to prevent undue delays. Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days	Noted.
Centrica	✓		Agree Impact on Organisation's Systems and/or Processes: No	Noted.
EDF Energy, Supplier response	✓		Agree Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days	Noted
SAIC Ltd on behalf of Scottish Power UK plc; SP Manweb plc;	✓		Agree	Noted.

Carried out by	Agree	Disagree	Comments	Analyst's Comments
ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd.; ScottishPower Energy Retail Ltd.; SP Transmission Ltd.			Comments: These are sensible proposals that will clarify the position for new Parties and Party Agents. Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days	
Npower Northern Ltd, Npower Northern Supply Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: No	Noted.
Npower Ltd, Npower Direct Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: No	Noted.
British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, British Energy Direct Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd	✓		Agree Comments: Agreed subject to reasonable central cost for implementation. Should clarify requirements and avoid confusion and mistimed changes. Impact on Organisation's Systems and/or Processes: Yes Comments: Minimal impact to include revision in internal baseline. Implementation Notification Required: 7 Days Comments: Minimal impact to include revision in internal baseline.	Noted.
IMServ Europe Ltd	✓		Agree	Noted.

Carried out by	Agree	Disagree	Comments	Analyst's Comments
			Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: Comments: N/A	
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Cottam Development Centre Ltd, Enizade Ltd, E.ON UK Drakelow Ltd, E.ON UK High Marnham Ltd, E.ON UK Ironbridge Ltd, Midlands Gas Ltd, Ownlabel Energy Ltd, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Western Gas Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: No	Noted.

APPENDIX 4 – DETAILED ANALYSIS OF CP1151 – ‘LATE COMMENT ON CLARITY OF THE P183 CHANGES TO BSCP504 STEP 3.2.6.8’

On 12 October 2005, ELEXON attended a walkthrough of Customer Transfer Programme (CTP) processes, organised by the CTP and attended by a number of Suppliers and Non Half Hourly Data Collectors (NHHDCs). In the course of this walkthrough, concern was expressed that the wording of the BSCP504 ‘Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’ changes for Code Modification P183 ‘Additional Mechanisms for Obtaining a valid Change of Supplier Reading’ was unclear, and could be read in a manner inconsistent with the agreed solution (as documented in the P183 Modification Report). The concern related to step 3.2.6.8 in particular.

Unfortunately this concern was not raised when the SVA November 05 BSCP504 changes were issued for industry consultation, and it was therefore too late to address the comment as part of the SVA November 05 release. It is proposed instead to clarify the wording of step 3.2.6.8 in the SVA/CVA February 06 release⁵. These wording changes do not represent a change to requirements – they are merely ensuring consistency with the approved solution to P183, as documented in the BRS.

The issue relates to the wording of the Action column for step 3.2.6.8, which was modified in the SVA November 05 release as follows:

Provide the customer Meter register reading, except if this reading is an old Supplier Estimated reading³⁶.

The intention of this change was to clarify that the timing requirements for a D0071 ‘Customer Own reading on change of Supplier’ containing an Old Supplier Estimated Reading (OSER) are different to those for other D0071 flows. This is clear in the P183 Business Requirements Solution (BRS), which states that:

Section 3.2.6, which sets out processes for ‘Change of Supplier for an existing SVA Metering System’, requires amendment to preclude the submission of OSERs to the new NHHDC earlier than SSD+5. The associated flow diagram in section 2.2.6 should be made consistent with this change.

However, it’s not clear that the wording change achieves this. In fact, a literal interpretation of the new wording would be that step 3.2.6.8 does not allow the NHHDC to provide an OSER. This was not the intention, and would in fact undermine the intent of P183, as it would leave no mechanism in the BSCP for a Supplier to submit an OSER to the NHHDC.

As explained above, the purpose of this CP is to make the minimum changes necessary to remove any confusion over the P183 solution.

With this in mind, the proposed change is to remove the words “except if this reading is an old Supplier Estimated reading” (which were added in the SVA November 05 release) from the Action column of step 3.2.6.8, and from the corresponding box on the workflow diagram in step 2.2.6. This will avoid any implication that BSCP504 does not permit an OSER to be submitted on a D0071 flow.

The footnote (36) to step 3.2.6.8, stating “An Old Supplier Estimated reading may not be provided by the new Supplier to the new NHHDC earlier than SSD+5”, will remain, to make clear the timing requirements for submission of an OSER.

⁵ Although P183 came into effect on 3 November 2005, allowing use of Old Supplier Estimated Reads in settlement, Suppliers will not be making use of it until February 2006, when a batch of related CTP changes is delivered. There should therefore be no impact in delaying the implementation of these wording changes until February 2006.

All 8 of the respondents to the participant impact assessment supported the CP.

The implementation cost of CP1151 is estimated as £440. It is believed that the removal of ambiguity from BSCP504 will justify this cost.

ELEXON's recommendation based on the participant impact assessment responses is that CP1151 is approved for inclusion in the CVA/SVA February 06 Release.

IA Summary for CP1151

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
CP1151	Late Comment on Clarity of the P183 changes to BSCP504 Step 3.2.6.8	CPC00539	8 responses; 8 agreed	BSCP504

IA responses for CP1151

Carried out by	Agree	Disagree	Comments	Analyst's Comments
IMSERV Europe Ltd	✓		Agree Comments: This was how we understood the change and this just clarifies it. Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days	Noted.
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power	✓		Agree Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days	Noted.

Carried out by	Agree	Disagree	Comments	Analyst's Comments
Distribution Ltd; Medway Power Ltd;				
E.ON UK	✓		Agree Comments: We agree that clarifying the wording around step 3.2.6.8 as proposed is required and approve the revised text. Impact on Organisation's Systems and/or Processes: No Comments: There is no impact as this is a housekeeping change. Implementation Notification Required Comments: Provided this is implemented in the SVA Feb 06 release we have no issues with the timing.	Noted.
Centrica	✓		Agree Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: na	Noted.
Scottish Power UK plc, ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Manweb plc, SP Transmission	✓		Agree Comments: Agree with change. Impact on Organisation's Systems and/or Processes: No	Noted.

Carried out by	Agree	Disagree	Comments	Analyst's Comments
Ltd.			Implementation Notification Required Comments: Next appropriate release, targeted for Feb 06.	
Npower Limited, Npower Direct Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited	✓		Agree Comments: After reviewing the BSCP it has been interpreted that npower will send the OSER no earlier than SSD +5 days.	Noted.
Npower Northern Limited, Npower Northern Supply Limited	✓		Agree Comments: After reviewing the BSCP it has been interpreted that npower will send the OSER no earlier than SSD +5 days.	Noted.
British Energy Power & Energy Trading Ltd; British Energy Generation Ltd; British Energy Direct Ltd; Eggborough Power Ltd; British Energy Generation (UK) Ltd	✓		Agree Comments: Clarity of wording is welcomed to avoid any confusion in the future. Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: N/A Comments: No notice is required as this is only a housekeeping change for our internal purposes. Other Comments: The requirement for this CP1151 does	Noted.

Carried out by	Agree	Disagree	Comments	Analyst's Comments
			not inspire confidence in the review process, which failed to identify the issue in the November 2005 release.	