CPC00651 Addendum - Impact Assessment of CP1260 in conjunction with Impact Assessment of CP1276

CP1260 - Meter Investigation Process where a Site is Capable of Exporting (microgeneration)

CP1276 - Process following the Installation of a Small Scale Third Party Generating Plant (Alternative to CP1260 'Meter Investigation Process where a site is capable of Exporting (microgeneration)

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement CP1260/CP1276/Neutral	Days Required to Implement
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	CP1276	We anticipate 9 months to make the changes and to fit in with our IT plans.
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO)	CP1276	90 days
Npower	Supplier, Party Agent	CP1276	November 2009 implementation
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	CP1260	180 days
E.ON UK Energy Services Limited	Party Agent NHHDC /DA MOA	CP1260	-
Association of Meter Operators	Trade Association for Meter Operators	CP1260	-
British Energy	Supplier	CP1260	-
Western Power Distribution	LDSO	Neutral	-
Electricity North West Ltd	LDSO	Neutral	-
E.ON	Supplier – NORW, EMEB, EELC, PGEN, EENG	No/Neither	182 days
EDF Energy	Supplier, NHH Agent and HH MOP	No	CP1260 – 90 days CP1276 – 270 to 360 days

Detailed Impact Assessment Responses

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
Western Power Distribution	Neutral	**Comments:** We are neutral as to which CP is approved but one of them needs to be implemented or CP1259, which obliges the LDSO to inform the Supplier following installation of generation, needs to be cancelled. We don't want to incur costs implementing CP1259 if the Supplier doesn't do anything when they get the information from us.		-CP1260
		Impacts:		
Scottish and Southern Energy	CP1276	**Comments:** None	**Comments:** We believe that this solution is a more efficient and a simpler one. It has no impact on our systems and processes and will allow us to meet the June 2009 release. It also allows for flexibility for Suppliers/Meter Operators agents to maintain contractual arrangements.	CP1276
		Impact on Systems: Systems and Processes	**Impact on Systems:** None	
		Capacity: Supplier and Mop	**Capacity:** No impact on any part of our business.	
		Impact on Organisation: Changes to systems. Amendments to internal processes to accommodate the changes.	**Impact on Organisation:** None	
		Cost: We anticipate significant costs to implement this change.	**Cost:** None	

Organisation	Agreement CP1260/ CP1276/ Neutral	CP1260 Comments	CP1276 Comments	Impact Yes/No
		Other: This option does not allow Suppliers to have an alternative contractual arrangement, in place with the MOA. The diagram (App A) for the CP1260 does not show what happens in case of a rejection of site visit on receipt of D0001? As in our previous response, we do not believe that D0001 is the correct flow to use.	**Other:** CP1276 process is robust, complete and consistent with BSCP514 compared to CP1260. The diagram (App A) does not make sense. It has been over simplified making the CP1276 solution appear more complicated, when in fact it is the simpler and robust option. A D0142 flow is a request for suitable metering. Following the site visit, a D0002 if meter installed is suitable or a D0149/D0150 if new meter fitted. Not both flows.	
EDF Energy	No/Neither	**Comments:** We support neither of these changes in their current forms. We would support CP 1276 if process to initiate MOP work was a D0001 and not a D0142. We do not support any change that requires re-working processing of a D0142 as this is most expensive method to implement. Processes we currently have for dealing with D0001s can be managed without system changes, although as a Supplier we might want to make these eventually.		No
		Impact on systems: no comment	**Impact on systems:** no comment	
		Capacity: Supplier and MOP	**Capacity:** Supplier and MOP	
		Impact on organisation: For Supplier process, with possible later system changes to manage D0001 from LDSO automatically. For MOP new D0001 monitoring process to deal with requests with SVCC for possible backstop issues.	System and process changes for MOP processing of D0142. There seems to be no method of identifying those D0142s that are related to this new process so all D0142 processing is impacted. Process changes required for Supplier, with later system changes to convert D0001 from LDSO to relevant D0142.	

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Cost: Work for process changes estimated at £8,000.	**Cost:** Work for process changes estimated at £8,000 and MOP system changes at £20,000.	
ScottishPower	CP1260	**Comments:** ScottishPower sees no advantage of using CP1276 over CP1260 as the CP currently stands. At this time it is difficult to quantity the number of meters in situ which do not have a backstop fitted. As things currently stand ScottishPower does not feel that Suppliers can accurately assess whether a backstop is fitted and as such the MOA should be contacted in all instances (this mirrors the CP1260 solution). However ScottishPower believes that there is a simpler solution to resolve the issue. ScottishPower believes there is a strong case for meter manufacturers to be obliged to publish lists of all their meters to clearly indicate which have backstops and which do not (it may be simpler to list which ones do with the assumption that if a meter is not on the list it will not have a backstop fitted). This should be published on an industry website such as Elexon or similar. If this was to be the case then ScottishPower would be minded to look more favourably upon CP1276. It is clear that if the Supplier could reference such a list then the D0142 would be the most appropriate flow to send as a Supplier would only contact the MOA when a meter replacement was required and as such the D0001 would not be appropriate.		CP1260

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Impact on systems: Systems & Processes		
		Capacity: Supplier, MOA		
		Impact on organisation: ScottishPower does not anticipate there being a difference between the two solutions. Both will require manual intervention thus the creation of new internal processes along with system impacts.		
		Cost: As stated above the costs would be similar for both solutions. ScottishPower do not as yet have full costs for either solution though we would expect there to be system impacts and more importantly internal process changes going forward as both solutions would involve manual intervention.		
Electricity North West Ltd	Neutral	**Comments:** None		Neutral
		Impact on systems: Yes		
		Impact on organisation: LDSO's have been omitted from the process see comments below		
		Other comment: LDSOs have been missed out of the process. The Meter operator should also send LDSOs initial and final meter readings and Meter Technical Detail data flows		
E.ON UK Energy Services Limited	CP1260	**Impact on system:** Minimal as this would trigger an investigation as does the receipt of any other D0001 flow	**Impact on system:** Significant changes would be required to ensure that unnecessary meter exchanges did not take place.	CP1260
		Capacity: MOA		

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Impact on organisation: Some procedural updates would be required	**Impact on organisation:** Extensive alterations to existing procedures would be required with the associated training and rollout requirements	

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Other Comments: This is our preferred solution of the two proposals as it utilises existing consistent systems	**Other Comments:** We would not support this solution for the following reasons: It proposes initiating a meter investigation using a flow designed to instruct a MOA to install or remove metering thus giving rise potential confusion whilst at the same time an established procedure exists for initiating an investigation namely the D0001 flow. There is a significant risk that an meter will be unnecessarily replaced with the resultant additional costs only to need replacing again as a result of industry changes within a relatively short period of time. It allows suppliers to establish independent arrangements with MOAs whilst this approach may be valuable where a MOA has a relationship with a single supplier where an MOA has relationships with multiple suppliers the potential exists that a MOA would need to support multiple parallel solutions with the resultant potential for confusion.	

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E.ON	Neither	**Comments:** We do not support the introduction of either of these CPs and are planning to raise an new alternative CP.		Yes
		Impact on systems: Yes. Our system will have to identify the site visit check code and we will have to either build a process to send the D0001 automatically to the appointed MOP, or we will have to manually investigate the flow and manually generate the necessary D0001. We will then have to monitor the response and track if the meter is being changed.	**Impact on systems:** Again, we will have to receive the D0001 and using the site visit check code, arrange to contact the customer to advise them of the impending meter exchange. Once on site we may find the meter does not require changing and so this will have to be explained to the customer. We will have to have an alternative process for sites where the meter doesn't need changing as the expected response to a D142 are meter exchange flows or abortive visit information.	
		Impact on organisation: This will impact the processing of the D0001 inbound and outbound as well as the processes for monitoring responses and updating meter exchanges.	**Impact on organisation:** This will impact the inbound processing of the D0001 and will require new processes to be used for the D0142 to deal with instances where the meter does not require changing. Alternatively if as we believe the D142 is the wrong flow and wish to put in commercial arrangements this will impact all of our metering contracts for the business	

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Cost: The system changes associated with this solution are less expensive since we will make changes for CP1259 to the flow and since we currently manage the receipt and responses of the D001 and D002, the only cost will be processing changes, however there is manual intervention and minor system changes required which cannot quantified due to the lack of information currently available on the likely ramp up of the installation of microgeneration.	Since commercial contracts would have to be negotiated and would remain confidential we cannot provide them at this time. However, we do believe that as well as unnecessary meter exchanges being requested there will be a percentage of abortive visit costs where access has not been granted to change the meter – further inflating the cost of this solution	
		Other comment: We believe this CP is not better than the current baseline and should be withdrawn		

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
		Additional comments on email: Please find additional comments below for CP1276: The Distributed Generation Co-ordinating Group carried out research on the likely replacement of meters without backstops in the event that microgeneration was installed. This research concluded that meters only need to be replaced where the meter is mechanical and it is not clear whether a backstop has already been fitted or is incorporated in the meter. It is inaccurate to suggest that meters will need changing on every occasion that a suppliers is made aware of the presence of micro-generating equipment (we believe this is more reasonably 36% of the time) and therefore it is unnecessary to request the MOP to change the meter on every single occasion; this solution will burden suppliers and customers with gratuitous costs. Currently the industry baseline allows suppliers to chose how to ensure they have appropriate metering on site and doesn't prescribe the use of any D-flow to carry out this validation. This allows the supplier to chose which process to adopt – the use of the D0001, the D0142, the telephone, email, letter or fax. Since one of the original rationales for CP1260 was to create a uniform industry process, it is unclear how CP 1276 facilitates this and in fact it is becoming clearer from the inability of the industry to agree on a common solution that this is not really what the industry wants and to that end CP1276 allows parties to enter into commercial arrangements in preference to the use of a mandated D flow, whilst restricting the use of D-flows to the D142. This is effectively allowing an opt out from the single industry process where contracts allow, but prescribing that a true investigative D-flow is not used to investigate a metering system, but requires parties to request that a meter is changed even when in 64% of occasions it may not need changing at all. If you apply the applicable objective test to this change proposal it is difficult to argue that a proposal that is supposed to create a single solution for the industry that permits an opt out that is open to parties to determine how to implement the change promotes efficiency in the implementation and administration of the Balancing & Settlement arrangements.		

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
Siemens Metering Services	CP1276	**Comments:** Siemens Metering Services strongly prefers CP1276 to CP1260. We still feel that the D1 is the incorrect flow to use in the circumstances described in CP1260. We believe that CP1276 offers a more flexible approach to both Suppliers and Party Agents, and builds on processes already in place.		
		Impact on systems: Process impact	**Impact on systems:** Minimal process impact	
		Impact on organisation: Large process changes would be required	**Impact on organisation:** No changes required	
		Cost: Potential costs of up to £2,000 pa, due to additional office admin around processing of D001 flows.	**Cost:** n/a	
Npower		**Comments:** We rejected CP1260 previously because we did not think it was appropriate to mandate Suppliers to use the D0001. We feel that there are circumstances where we would need to adopt a more flexible approach. If we have information that indicates the meter is running backwards/requires a backstop then we feel it would be more appropriate to send a D0142. Conversely, if we have information that indicates the meter already has a backstop/is not running backwards we do not want to be mandated to use a D0001 to carry out an investigation.	**Comments:** We feel CP1276 provides a process that enables Suppliers to adopt a more flexible approach and allows them to take the most appropriate course of action dependent on the information they have received from the LDSO/customer about the meter.	Yes

Organisation	Agreement CP1260/ CP1276/ Neutral	CP1260 Comments	CP1276 Comments	Impact Yes/No
		Impact on systems: There will be impact on processes		
		Impact on organisation: Mandating the use of the D0001 would not require any system changes because we already send D0001's. However we do not believe it is the correct use of the D0001 flow.	**Impact on organisation:** As the D0142 is an existing flow we do not envisage any system changes. CP1276 enables Suppliers to take the most appropriate course of action.	
		Cost: We do not envisage any system change costs because we currently send D0001's however we are concerned there could be increases in MOA costs because we may incur additional costs for unnecessary site visits.	**Cost:** We do not envisage any system change costs because we currently send D0142's. We believe that a more flexible process would ensure Suppliers can take action dependent on the information they have about the metering on site rather than having to carry out an investigation/send a D0001.	
Association of Meter Operators	CP1260	**Comments:** This depends on the proportion of meters that actually need changing. As lack of backstops is believed to only an issue for meters dated (manufactured) prior to 1984 the proportion of meters in use is declining. When a smart meter role out commences they will all be removed. Doing the D0001 check first gives the opportunity for MO to respond, prior to changing a meter for no purpose. I would expect Meter Operators to be able to tell the Supplier/Distributor that there is no value in asking for meters where the serial number indicates they are newer than 1984. This should substantially reduce the number of Supplier requests. I would propose that a step should be introduced to require the Supplier to filter any requests prior to asking the MO.		-

Organisation	Agreement CP1260 / CP1276 / Neutral	CP1260 Comments	CP1276 Comments	Impact Yes / No
British Energy	CP1260	BE view is a solution is required by the Industry, and if so the best solution would be CP1260 A Guidance document to be required if no solution was reached in the best way to deal with the situation.	Without an initial MOP investigation we would question how a supplier would identify if a backstop exists. Also a D0142 could be taken as an instruction to install new metering regardless of whether it is required.	Yes - Processes

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	SAIC	CP1276	6.3.6.5	M	This stage should precede step 6.3.6.3 as it would be the first step that an MOA would take. Only after this check had been made and if the meter is found not to have a backstop would a meter replacement take place.
2	SAIC	CP1276	Pp 1, footnote 2	L	The Customer should inform the LDSO that they have installed apparatus capable of generation on the LDSO's network. Therefore ScottishPower believes that the Supplier should in this instance also inform the LDSO that they have received such notification from the Customer or direct the customer to the LDSO in the first instance.
3	SAIC	CP1276	Pp1, Footnote 4	M	The phrase "take appropriate action" is not sufficiently succinct and is left open to interpretation
4	SAIC	CP1260		M	It may improve the process defined for CP1260 to include step 6.3.6.4 from CP1276 where the meter is replaced.
1	Electricity North West Ltd	CP1276	6.3.6.4	L	LDSO" missing from the words in the 3rd box in Redline Changes
2	Electricity North West Ltd	CP1276	proposed solution		LDSO" missing from the words bullet point 3 in the Proposed Solution in the CP1276 document
1	Npower	CP1276	BSCP 514 (6.3.6.4) Action box 2nd Paragraph	M	The redlining in the 'Action' box states that the MOA should send a D0010 (initial Meter register reading for replacement Metering system) to the NHHDC, Supplier and LDSO. The DTC states the instances of the D0010 from MOA to Supplier and MOA to Distributor should only be used when the meter is HH and the reading is either initial and/or final. Supplier and LDSO should be deleted as the MOA should only be sending the D0010 to the NHHDC.
2	Npower	CP1276	BSCP 514 (6.3.6.4)	M	The redlining in the 'Action' box states that the MOA should 'provide the new Meter details to the Supplier'. This should read 'Provide the new Meter Technical Details' and the 'To' box

			Action box 3rd Paragraph		which currently lists Supplier should also include NHHDC and LDSO.
3	Npower	CP1260	BSCP514 (6.3.6.3)	M	A new step is required. If there has been a meter change the Meter Technical Details should be sent to the NHHDC and the LDSO in addition to the Supplier.
4	Npower	CP1260	BSCP (6.3.6.3)	M	A new step is required. If there has been a meter change then the MOA should send the NHHDC a final register reading for the old meter and an initial register reading for the new meter.