Change Proposal Circular

CPC00674: Impact Assessment of CP1322, CP1323 and CP1324

Responses for CP1322 'Review of the CSD Architectural Principles Document'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Gemserv	MRASCo Ltd	Yes	No	0
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	No	0
E.ON Energy Services Limited	MOA NHHDC-DA	Neutral	No	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	No	0
SAIC on behalf of: ScottishPower Energy Management Ltd; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd; SP Manweb plc; SP Transmission Ltd; SP Distribution Ltd.	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	No	0
E.ON	Supplier	Yes	No	0
NPower Limited	Supplier / Supplier Agents	Yes	No	0
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	0
British Gas	Supplier	Yes	No	0

Any Questions

If you have any queries, please contact:
CCC@elexon.co.uk.

Or contact:
BSCP40 Change Process Task Leader
020 7380 4213
task.leader@elexon.co.uk.

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Gemserv	Yes	No	-
Independent Power Networks Limited	Yes	No	**Comment:** This is largely a house keeping exercise to bring the CSD Architectural Principles Document in line with current practices. **Would implementation in the proposed Release have an adverse impact on your organisation**? No, we anticipate there being no adverse impact on our organisation. **Associated Costs**: None
E.ON Energy Services Limited	Neutral	No	-
EDF Energy	Yes	No	-
SAIC:	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** None – Documentation changes only
E.ON	Yes	No	-
Npower Limited	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** No impact **Associated costs:** None
Scottish and Southern Energy	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** No **Do you have any other comments?** No
British Gas	Yes	No	**-**

No comments on the redline text.

About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Responses for CP1323 'Review of the Qualification Self Assessment Document'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Gemserv	MRASCo Ltd	Yes	No	0
Independent Power Networks Limited	LDSO, UMSO, SMRA	Yes	No	0
Power Data Associates Ltd	MA	Yes	Yes	Nil
E.ON Energy Services Limited	MOA NHHDC-DA	Yes	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	No	0
SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	No	0
E.ON	Supplier	Yes	No	0
NPower Limited	Supplier / Supplier Agents	Yes	No	0
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	0
British Gas	Supplier	Yes	No	0

Detailed Impact Assessment Responses			
Organisation	**Agree?**	**Impacted?**	**Comments**
Gemserv	Yes	No	-
Independent Power Networks Limited	Yes	No	**Comment:** The proposal mainly implements house keeping changes but also strengthens the SVA qualification process by introducing a section on the need for the applicant to be able to demonstrate their PARMs reporting ability. **Would implementation in the proposed Release have an adverse impact on your organisation?** No, we anticipate there being no adverse impact on our organisation. **Associated Costs:** None
Power Data Associates Ltd	Yes	Yes	**For which role is your organisation impacted?** MA **What is the impact?** Documentary if/when need to update SAD return **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated Costs?** Nil – until need to update SAD **Any other comments** - This should have been captured as an impact when the CP on changes to BSCP520 were considered by ELEXON. **Do you have any other comments?** Your new form structure is not easy to complete.
E.ON Energy Services Limited	Yes	Yes	**For which role is your organisation impacted?** MOA NHHDC-DA **What is the impact?** Care will need to be taken that the latest version of the SAD is completed in the course of Qualification activity. **Would implementation in the proposed Release have an adverse impact on your organisation?** None
EDF Energy	Yes	No	-
SAIC:	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** None – Documentation changes only
E.ON	Yes	No	-
NPower Limited	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** No impact **Associated costs:** None

Detailed Impact Assessment Responses			
Scottish and Southern Energy	Yes	No	**Do you have any other comments?** No
British Gas	Yes	No	-

No comments on the redline text

About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Responses for CP1324 'Access Requirements for Offshore Metering Installations at 132kV or Above'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Gemserv	MRASCo Ltd	Neutral	No	0
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	No	0
E.ON Energy Services Limited	MOA NHHDC-DA	Neutral	No	0
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	No	0
SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	Yes	30
E.ON	Supplier	Yes	No	0
NPower Limited	Supplier / Supplier Agents	No	Yes	0
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	Yes	0
British Gas	Supplier	Yes	No	0
British Energy	Generator/Supplier/Trader non-physical/CVA Meter Operator	Neutral	No	N/A

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Gemserv	Neutral	No	-
Independent Power Networks Limited	Neutral	No	-
E.ON Energy Services Limited	Neutral	No	**Comment -** We would agree that the provisions proposed would go some way to minimising the risks associated with metering installations at offshore locations. However we do not anticipate this having a direct impact on our activities.
EDF Energy	Yes	No	-
SAIC:	Yes	Yes	**If yes, then for which role is your organisation impacted (e.g. Supplier, HHDC, etc)?** MOA, HHDC, Supplier **Please state what the impact is:** Impact will be only be in regards to internal processes. **How much notice would you need to implement this change, if they were approved?** ScottishPower supports the CP and believes it is an appropriate improvement to the current processes. **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Do you have any other comments?** No further comments.
E.ON	Yes	No	-
NPower Limited	No	Yes	**If yes, then for which role is your organisation impacted?** RWE Innogy **Please state what the impact is:** Please see Question 6 (i.e. comments below). **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs**: Unknown at this stage **Any other comments:** Communication Redundancy etc The proposal says "each outstation will be connected to two communication lines", while the redlined document COP 1 (and COP2) give the definition of an outstation system as having a single Communication Line. Should this perhaps refer to a shared Communication System (and define that term).

			The definition of Communication Line as a line or link dedicated to an Outstation System … The term dedicated precludes any other traffic on that line or link. That is not how modern communication systems are generally constructed. Use is made of shared traffic on networks, and the number of fibres from onshore to offshore is limited. The use of Virtual Local Area Networks for metering should be explicitly permitted. The cost of providing dedicated lines for metering purposes would be high. The identification of Communication Lines by a unique number: unique within what scope? Is this unique to the registrant, in which case he will manage the identification, or unique across the whole BSC system, in which case it must be done centrally. There is no definition of the procedure. Possibly CTN or PSTN uniqueness is ensured if the numbers proposed are actually telephone numbers. However, IP addresses are not allocated to communications lines, but to communications ports on devices. Any device with two communications ports therefore has two IP addresses. An outstation system comprising 4 main and 4 check meters with embedded outstation software in each meter, and connected via two network switches and two fibres back to on-shore could have 8 or 16 IP addresses, depending whether each meter has one or two IP connections. The use of private domains (10.x.y.z addresses) within companies means that different outstations in different companies may have the same IP address, and these can be translated by various means (Network Address Translation or proxy servers) into externally visible addresses. Particularly with IP facilities, firewalls and security are major issues. Transport to offshore locations There is nothing mentioned in any of the changed documents about who is responsible for providing transport to site, and for providing rescue cover. The availability of boats and rescue cover will be a major issue for MOAs and CDCA and TAA. Providing such facilities for fault repair at short notice will have a high cost impact. A visit to a meter is not a man in a van, followed by a short walk to an accessible installation, but a team of people in a boat that costs £k per day to operate. The impact on other work (not doing it in time) may also be considerable if a boat must be diverted. If the MOA has their own boat and crew, they may be in the wrong location. Travel time must be taken into account. Much of this may be for bipartisan arrangements between the MOA and the Registrant, but there are other parties such as CDCA who may attend site.

			Metering Equipment Faults and Performance Standards The MOA, not the Registrant is responsible for meeting performance standards. The relevant standards are: Subprocess Fault repairs Performance Measure Time to rectify faults which would constitute a category 1 or category 2 non compliance as defined in BSCP27 [Category 1 Non Compliance A non-compliance has been identified which is deemed to be currently affecting the quality of data for Settlement purposes Category 2 Non Compliance A non-compliance has been identified which is deemed to have the potential to affect the quality of data for Settlement purposes] Service Levels (i) 95% rectified within 5 working days of receipt of notification; (ii) 99% rectified within 15 working days of notification. As the requirement is on the MOA, not the registrant, does 95% refer to 95% of all faults that a particular MOA is responsible for? Can they offset good performance onshore against worse performance off shore, and one Registrant against another? Do existing onshore MOAs have the experience to operate off shore? A new MOA operating only offshore could be at a significant disadvantage. As described above, access to offshore locations will be a major issue, not only for the weather. It seems unlikely to me that it would be possible for an MOA to economically provide 95% fixing of category 1 and category 2 faults offshore within 5 working days, unless he had his own boat and crew stationed locally, and they would have little to do most of the time. In practice each system will have main and check meters on each circuit, HV SCADA repeat readings, and analogue measurements. Each turbine will have power output readings via the wind turbine control system. Loss of a single meter will have no commercial impact, loss of main and check will have an administrative impact, requiring manual adjustment and/or agreement of data, but minor commercial impact. Is loss of a single meter category 2? Much of the aim of this modification is to provide redundancy of communications, so that fewer faults are category 1, but if any failure of the standby system is counted as category 2, the number of those faults could be higher, due to the increased number of components, and to

Detailed Impact Assessment Responses			
			configuration complexity. Our view is that we should segregate offshore and onshore metrics, and put a less onerous requirement on faults that require an offshore expedition as against those that perhaps only require work on-shore, and also differentiate between category 1 and category 2, at least so far as category 2 faults could include some loss of redundancy, and hence some potential to loss of data quality. "Checks at least every 12 months" This term is ambiguous, if least refers to 12. For instance 13 is at least 12. 11 is less than 12 so is not OK. There should be some capability to schedule a visit later, in order for them not to be dragged forwards in the year as they get scheduled for 11.5 months say, and the limit should be in days, as a month is not a fixed time period. A change similar to this was recently approved in relation to visits to identify unoccupied premises.
Scottish and Southern Energy	Yes	Yes	**If yes, then for which role is your organisation impacted (e.g. Supplier, HHDC, etc)?** Supplier and MOA **Please state what the impact is: Minor** changes to training and procedures. **Do you have any other comments?** No
British Gas	Yes	No	**-**
British Energy	Neutral	Not currently	**Would implementation in the proposed Release have an adverse impact on your organisation?** N/A **Associated costs:** N/A **Do you have any other comments?** Please see Q7 below (i.e. redline text comments).

Comments on the redline text

No.	Organisation	Document name	Location	Severity Code	Comments
1	British Energy	CoP1	3.7 5.5	H	It is not clear that the proposed definition of 'Communication Line' will meet the stated objective of minimising the risk of common mode failure. The use of separate PSTN (land line) telephone numbers will not necessarily guarantee this. They could still depend on the same

Comments on the redline text					
					line card in the same telephone exchange, connected to the site via the same cable, and wired locally through the same termination boxes and terminals. The loss or damage of any of these could still result in total loss of communications for data collection. Other options should be considered such as using different technologies for each line (e.g. PSTN and GSM), the use of private and public networks or the use of public network lines from separate telephone exchanges. To address these points it is suggested that the proposed definition be reconsidered.
2	British Energy	CoP2	3.7 5.5	H	Comments as per Item 1 above.
3	British Energy	CoP3		M	It is noted that the requirement for separate communication links to each outstation has been confined to CoPs 1 and 2. This is acceptable providing there are no future offshore metering systems for circuits rated >10MVA. If this cannot be guaranteed it is suggested the proposed CoP 1 & 2 changes should also be made to CoP 3.