

Attachment 6: Party and Party Agent impact assessment responses to the Requirements Specification of P214 v1.0

Assessor: Vasu Mistry

Organisation: Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;

BCA/PACA:

(delete as appropriate)

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	No, although will necessitate a minor change with at least 10 working day notice.

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	Preferred option.

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	Preferred option

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	Preferred option

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	Preferred option

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	Yes, the FAA backing sheet is requested and loaded into the SONET system.
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	Loaded into SONET.
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?

Answer 11c	
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Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	We would propose a limit of approximately £100 – any limit should be small to prevent adverse exposure to the industry in the event of a party defaulting.

Question 13	Any other comments?
Answer 13	

CPC00614: Impact Assessment of P214

Assessor: Dave Morton

Organisation: EDF Energy, Supplier Response

BCA:

(delete as appropriate)

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	Yes. We are at this stage though unable to provide full details of likely costs and implementation details. We believe even simplest of these changes would require a minimum of six months notice. At this stage there are still a number of issues that need to be addressed with a number of these options before more exact details of implementation requirements could be provided.

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	Yes, we are impacted by ET1. We currently have an automated process which picks up the encrypted electronic backing sheets (FAA-I002), and ET1 will require minor adjustments to this automated process.

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	Yes, we are impacted by ET2. We currently have an automated process which picks up the encrypted electronic backing sheets (FAA-I002). Option ET2 will require minor adjustments to this automated process, no more than ET1, possibly slightly less.

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	Yes, EN1 will impact, as we will need to either manually decrypt the advice notes, or create an automated process for doing so.

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	Yes, EN2 will impact us, as we will need to change working practice, but impact is negligible, and significantly less than EN1.

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	Yes, impact of BS1 is significant. It would mean a change in IT systems that validate and load the current FAA-I002 trading charges backing sheet. FAA-I002 is a key file in our validation procedures, and many automated calculations and reports are triggered from this file arriving and being successfully loaded into our IT systems. This option is by far the most inconvenient and expensive to implement. The existence of two separate backing sheets, one for payables, and one for receivables also complicates the final IT solution.

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	Yes, impact of BS2 is significant, but to a lesser extent than option BS1. Our understanding of BS2 is that the Trading charges for all Settlement days/Run types which take the payment/receivable amount over the 'payment/receivable threshold' will be in a single file. This will occur even though they may initially relate to different "Payment Dates", as published on the FAA Payments calendar. As with BS1, the existence of two separate backing sheets, one for payables, and one for receivables also complicates the final IT solution.

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	BS3 would result in minimal change, although clearly the impact of this approach is significantly more/less, dependant on the approach to the application of the Thresholds (T1 or T2). Combined thresholds, but separate backing sheets will have large IT implications and costs associated with it. We are assuming that BS3 also includes the two separate backing sheets for payments and receivables (for each charges type), in which case, as with BS1 and BS2, the existence of two separate backing sheets, one for payables, and one for receivables also complicates the final IT solution.

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	T1 is suggesting a combined Threshold for the 3 charge types: Trading, Dispute (reconciliation as the requirement specification describes it) and Default. In our opinion this is only going to create problems and additional work, particularly IT system changes, in order for companies to manage and predict the arrival of Advice notes and backing sheets for combined payment dates (as per the FAA payment calendar). Having a payable and receivable threshold does cause complications and will mean additional IT changes/costs.

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	T2 is the least impact option for us, and would be our preferred way forward. It keeps the Trading charge process completely independent of the other two charge types, and minimises IT impact/costs to our business. Having a payable and receivable threshold does cause complications and will mean additional IT changes/costs.

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	Yes, we do request the FAA-I002. As mentioned in earlier questions this is a key flow for our validation and reporting processes.
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	We have a system that automatically decrypts and loads the FAA-I002. If the file is loaded successfully, a whole suite of Trading charge validations and reports are automatically run.
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?
Answer 11c	<p>Bespoke Oracle based database system, SONET, used for validations. On a successful load of an FAA-I002 file, the system will validate all the NETA Trading charges and raise exceptions where FAA values does not match up with SAA's view or our Independent view, based upon independently gathered NETA data.</p> <p>It is important to note that we base many of our calculations, validations and reports on the existing FAA payments calendar. If this was to be changed, i.e. separate thresholds, then this means that we will not necessarily be paying for some Settlement day/run types as published on this timetable. As previously mentioned our systems and processes will require significant changes to manage these amendments.</p>

Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	£50-£75 per transaction

Question 13	Any other comments?
Answer 13	<p>Of all the options outlined, option BS3/T2 causes the least IT impact to our business processes and IT systems. However even this option will introduce IT and business process changes which come at quite a significant cost. The benefits of this modification do not seem to outweigh these costs.</p> <p>Given the IT implications, we would prefer an alternative approach which would be for Elexon/FAA to formalise the pre-payment approach, which would eliminate the need for IT changes on such a large scale.</p> <p>Under the threshold approach, it is technically possible to settle and pay for an R1 run for a Settlement day without having settled and paid for the SF run for that same Settlement date.</p> <p>We are not convinced by the requirement for the separate Payment/Receipt thresholds, and would like Elexon to clarify exactly why such additional complications are felt to be necessary.</p> <p>We have yet to get a response from our VAT team, but if the threshold is introduced, the likelihood is that the tax point created by the invoice will fall at a later date, resulting in VAT due to HMRC being paid late. We feel that further clarification on this issue needs to be provided.</p>

CPC00614: Impact Assessment of P214

Assessor: Andy Morran

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BCA/PACA: BCA

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	Yes

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	<p>This would require changes to the current process in order to identify and separate the advice notices/confirmation notices from the backing sheets as these would be processed differently.</p> <p>A high level estimate of costs to make these changes would be £5,000.</p> <p>Implementation would require 2-3 months.</p>

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	<p>This would require fewer changes as the current process for the backing sheets would remain unchanged. A new process to identify the advice notices/confirmation notices e-mails and to then process them would be required.</p> <p>A high level estimate of costs to make these changes would be £2,500.</p> <p>Implementation would require 1 month.</p>

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	<p>The current decryption process would need to be amended to decrypt the encrypted Advise Notes and Confirmation Notices. This will also involve additional licences being purchased to allow the decryption of Advice notes and Confirmation notices.</p> <p>This will have a cost impact of approximately £2,500.</p>

	Implementation would be Approximately 1 month.
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Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	<p>The current decryption process for existing backing sheets would remain unchanged. Processes of the unencrypted Advise Notes and Confirmation Notices would be processed separately.</p> <p>This will have zero cost impact.</p> <p>Implementation would be immediate.</p>

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	<p>This would have a significant and expensive impact. At present there is a single backing sheet for each BSC party that contains all payable and receivable amounts for trading and reconciliation charges, splitting these into separate payable and receivable backing sheets would require significant re-engineering of our internal validation application in order to process the split data. There would not appear to be any obvious need to split the data there would only ever be a net payment /receivable amount therefore there is no justification for changing the present configuration of the single backing sheet.</p> <p>Reworking would also be required to include the processing of the default charge data within the backing sheet. As there is limited data included in the posted backing sheet for default charges there would be only a limited advantage in including this data in the electronic backing sheet. The expense of changing the current application to accommodate this extra data would outweigh any advantage gained and therefore is not justifiable.</p> <p>High level estimate of the cost would be £7,500-10,000 for processing the split backing sheets and £2,500 for processing the backing sheet for default charges.</p> <p>Implementation would require 4-6 months.</p>

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	<p>See answer 6</p> <p>High level estimate of the cost would be £15-20,000 for processing the split backing sheets and £2,500 for processing the backing sheet for default charges.</p> <p>Implementation would require 4-6 months.</p>

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	<p>This option is confusing, the current situation is that a single backing sheet is issued for each BSC party, detailing the trading charges and reconciliation charges <i>but not the default charges</i>. However this would be the least cost option as the only change would be process the additional default charge data however as there is limited data included in the posted backing sheet for default charges there would be only a limited advantage in including this data in the electronic backing sheet. The expense of changing the current application to accommodate this extra data would outweigh any advantage gained and therefore is not justifiable.</p> <p>High level estimate of the cost would be £2,500 for processing the backing sheet for default charges.</p> <p>Implementation would require 1 month.</p>

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	<p>A simple reworking of existing reports would be required to be able to validate charges over multiple days.</p> <p>Implementation cost and timescale would be negligible</p> <p>N.B. this assessment is based on the assumption that the backing sheets would be issued daily and that only the advise note, confirmation notices would be subject to the threshold limit.</p>

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	<p>A simple reworking of existing reports would be required to be able to validate charges over multiple days. However this would be more complex option as each charge type would have different payment periods i.e. the trading charges could be for a single day while the default charges represent a month for example.</p> <p>Implementation cost and timescale would be negligible</p> <p>N.B. this assessment is based on the assumption that the backing sheets would be issued daily and that only the advise note, confirmation notices would be subject to the threshold limit.</p>

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	Yes. The electronic backing sheet data is decrypted and is automatically loaded into the SONET application, (this is an off the shelf application) to validate the daily FAA data to both SAA data and internal data in order to validate the payments made/received. Any discrepancies are then investigated and resolved.
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	See 11a above
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?
Answer 11c	See 11a above

Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	The cost of processing a single transaction is approximately £6.00 per transaction, this cost applies regardless of the value of the transaction.

Question 13	Any other comments?
Answer 13	<p>In order to minimise the impact to any existing automated processes that Parties may have then the least changes required to address the original issues should be implemented.</p> <ol style="list-style-type: none"> 1. Separate E-mail of encrypted Advice Notes, Confirmation Notice and Default Charges, backing sheets to be e-mailed as per current arrangement. 2. Single Advice Note/confirmation Notice /Default charges for both payments and receivables (as per current arrangement). 3. Single Backing sheet for each payment date for Advice Note, Confirmation Notice and Default charges as per 2. above. 4. Threshold to apply to the netted total of Advice Note/confirmation Notice /Default charges. <p>Other comments:</p> <p>2.3.5 Threshold Governance</p> <p>It is not necessary to include specific limits in the wording of the Code. Whilst these guidelines are appropriate today they may not be appropriate in a 1,2 5 or 10 years time and to require a change to the code to adjust them would be onerous. Given that any change would be open to Industry Consultation then the Code itself should be silent on the actual limit.</p>

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CPC00614: Impact Assessment of P214

Assessor: Louisa Stuart-Smith

Organisation: Npower Limited

BCA: Ros Bucknall

(delete as appropriate)

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	Yes, npower would be impacted by the proposed modification.

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	We would be impacted by any proposed change to the current communication methods. At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	We would be impacted by any proposed change to the current communication methods. At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales. An initial assessment suggests a preference for the Advice Notes/Confirmation Notices to be emailed separately from the Backing Sheets as this would require less internal IT development.

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	We would be impacted by any proposed change to the current communication methods. At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales. An initial assessment has suggested there will be increased costs if the use of encryption is extended. The required software is not currently supported by internal IT.

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	<p>We would be impacted by any proposed change to the current communication methods.</p> <p>At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.</p> <p>Dependent on cost our preference would still be to have invoices sent electronically instead of by post.</p>

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	<p>We would be impacted by any change to the current process carried out for Advice Notes/Confirmation Notices.</p> <p>At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.</p>

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	<p>We would be impacted by any change to the current process carried out for Advice Notes/Confirmation Notices.</p> <p>At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.</p>

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	<p>We would be impacted by any change to the current process carried out for Advice Notes/Confirmation Notices.</p> <p>At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.</p>

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	<p>We would be impacted by the introduction of thresholds.</p> <p>At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.</p>

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	We would be impacted by the introduction of thresholds. At present it is not clear what the costs will be as there is a dependence on St Clements Services assessment of their implementation costs and timescales.

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	Npower currently requests electronic Backing Sheets for general good business practice.
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	Npower currently uploads the Backing Sheets into SONET (St Clements Services system) for Validation purposes.
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?
Answer 11c	

Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	Confidential information removed.

Question 13	Any other comments?
Answer 13	No

CPC00614: Impact Assessment of P214

Assessor: Alastair Barnsley

Organisation: E.ON UK Energy Services Limited

PACA

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Phone No.: 02476 186886

Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	No

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	N/A
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	N/A
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?

Answer 11c	N/A
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Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	

Question 13	Any other comments?
Answer 13	

CPC00614: Impact Assessment of P214

Assessor: Michelle Derbyshire

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BCA/PACA: PACA

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	NO

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	

Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	n/a
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	n/a
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?

Answer 11c	
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Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	

Question 13	Any other comments?
Answer 13	

CPC00614: Impact Assessment of P214

Assessor: Jonathan Perks

Organisation: British Energy Power & Energy Trading Ltd

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Please provide responses to the following questions:

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	Yes

Question 2	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET1?
Answer 2	Option ET1 would result in an internal system and process change, and is less desirable than Option ET2. If Advice Notes/Confirmation Notices and associated Backing sheets are sent unencrypted then a 3-month implementation timescale would be sufficient. Otherwise a 6-month implementation timescale would be required.

Question 3	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option ET2?
Answer 3	Option ET2 is preferred. It would result in a minor system and process change. If Advice Notes/Confirmation Notices are sent unencrypted then a 3-month implementation timescale would be sufficient. Otherwise a 6-month implementation timescale would be required.

Question 4	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN1?
Answer 4	Option EN1 would result in a major internal system and process change, and is significantly less desirable than Option EN2. Due to our current e-mail security system policy we would be unable to allow encrypted files to enter our network. We would therefore not be able to access information contained with Advice Notes/Confirmation Notices. We would be required to create an additional e-mail account (accessible to multiple users) to receive emails from Central Systems. In addition we would be required to provide suitable storage for .pdf documents and provide separate (and potentially segregated) storage for .csv files. If Option EN1 is adopted we would require at least 6-months for implementation.

Question 5	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option EN2?
Answer 5	<p>Option EN2 is preferred. It would result in a minor system and process change. We would be required to create an additional e-mail account (accessible to multiple users) to receive emails from Central Systems. In addition we would be required to provide suitable storage for .pdf documents and provide separate (and potentially segregated) storage for .csv files.</p> <p>If Option EN2 is adopted we would require 3-months for implementation. Please also note that we would prefer that both the Advice Notes/Confirmation Notices and the associated Backing Sheets were sent unencrypted.</p>

Question 6	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS1?
Answer 6	No impact. Option BS1 is preferred to Options BS2 and BS3.

Question 7	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS2?
Answer 7	No impact. Option BS1 is preferred to Options BS2 and BS3.

Question 8	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option BS3?
Answer 8	No impact. Option BS1 is preferred to Options BS2 and BS3.

Question 9	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T1?
Answer 9	Our preference would be to not adopt thresholds due to the associated risks to existing business processes, although it is unlikely that we will fail to breach these thresholds in the future.

Question 10	If impacted, please provide a description of the impact, any costs incurred, and the implementation timescales required from when you receive the finalised redlined documentation for Option T2?
Answer 10	Our preference would be to not adopt thresholds due to the associated risks to existing business processes, although it is unlikely that we will fail to breach these thresholds in the

	future.
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Question 11a	Parties are requested to state whether or not they currently request electronic Backing Sheets, and why they do or do not request electronic Backing Sheets?
Answer 11a	At present we do not utilise the information contained within the electronic Backing Sheets. Existing business processes validate the amounts on Advice Notes/Confirmation Notices against data contained within SAA flows. It is possible that in the future we will look to incorporate electronic Backing Sheets into our business processes.
Question 11b	Parties are also requested to provide details of how they use electronic Backing Sheets, for example, do they use Excel to view them or have they developed bespoke automated systems for handling the files?
Answer 11b	See answer to 11a.
Question 11c	If Parties have developed automated systems it is requested that they provide details of how these systems work?
Answer 11c	See answer to 11a.

Question 12	In order to assist the P214 Modification Group in proposing an initial monetary threshold Parties are requested to provide the cost they incur when making a payment as part of their Impact Assessment? These costs should include consideration of the administrative costs in processing a transaction, along with the cost of the transaction itself.
Answer 12	

Question 13	Any other comments?
Answer 13	

CPC00614: Impact Assessment of P214

Assessor: Christopher Wood

Organisation: Gaz de France

Question 1	Would the Proposed Modification, as outlined in the attached Requirement Specification for Modification Proposal P214, impact your organisation? Yes / No*
Answer 1	In terms of the suggested proposals - none of them would require changes to our current systems.