

CPC00575: Impact Assessment Responses for CP1158, CP1160 and CP1164 - CP1169

CP1158

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	✓		Agree: Yes Impact: Yes Implementation Notification: 90 Days
PDAL	✓		Agree: This will clarify the governance of the Operation Information Document. Would changes to the OI would still come through changes to agreed by UMSUG, or would any party be able to raise a change? It would be best that the change route remains through UMSUG, with a revised document being agreed, then formally included in the MDD. Impact: N/A Implementation Notification: N/A
EDF Energy	✓		Agree: We agree that this is a worthwhile change as it will improve visibility of changes to UMS data. It will also enable all parties to provide comments on such changes and plan better for inclusion of any changed data. Impact: No Implementation Notification: N/A
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: Yes Comments: There would be an impact to systems and processes if the information were to be included. Implementation Notification Required: 60 Days
E.ON UK Energy Services Limited	✓		Agree

Carried out by	Agree	Disagree	Comments
			<p>Comments: We agree this change. Any changes to UMSO data that are communicated out to the industry should be clearly marked and included on the MDD circular as well as referring participants to the documentation on the web site, to ensure that they are not missed by participants.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: MDD changes are fully automated in NHHDC and mostly automated in NHHDA (all except GGPCDEAC). A process and system will be needed to update any unautomated data items.</p> <p>Implementation Notification Required: 60 Days</p> <p>Comments: To allow for IS to specify, develop and test update method.</p>
<p>E.ON UK plc (SVA), 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, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd</p>	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes.</p> <p>Implementation Notification Required: 60 Days</p> <p>Comments: To allow thorough testing to be completed prior to implementation date</p>
<p>Southern Electric Power</p>		✓	<p>Disagree</p>

Carried out by	Agree	Disagree	Comments
Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;			<p>Reason: Is MDD a suitable process for managing these changes bearing in mind that it is possible to have provisional charging codes? Will using the MDD process remove the need for provisional data?</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
Centrica	-	-	<p>Neutral</p> <p>Impact on Organisation's Systems and/or Processes: No</p>
Western Power Distribution	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Minor procedural change</p> <p>Implementation Notification Required: 0 Days</p> <p>Comments: Can implement straight away</p>
SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		<p>Agree</p> <p>Comments: The change will increase visibility to any changes which occur. We therefore support the change.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: The change will have no impact on systems or processes.</p>
AccuRead Ltd	✓		Agree

Carried out by	Agree	Disagree	Comments
			<p data-bbox="929 280 1693 308">Impact on Organisation's Systems and/or Processes: Yes</p> <p data-bbox="929 355 1541 383">Implementation Notification Required: 0 Days</p> <p data-bbox="929 430 1879 493">Comments: We just need to be made aware before it is included to ensure it is implemented correctly.</p>
<p data-bbox="138 505 564 719">Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>	<p data-bbox="658 505 685 528">✓</p>		<p data-bbox="929 505 1010 533">Agree</p> <p data-bbox="929 580 1928 608">Implementation Notification Required: February 2007 – Next Available Release</p>
<p data-bbox="138 729 564 756">Association of Meter Operators</p>	<p data-bbox="667 729 674 751">-</p>	<p data-bbox="824 729 831 751">-</p>	<p data-bbox="929 729 1128 756">Not Applicable</p> <p data-bbox="929 804 1234 831">Reason: No involvement</p>

CP1160

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	-	-	Neutral
EDF Energy	✓		Agree: Yes Impact: No Implementation Notification: N/A
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	✓		Agree (qualified) Comments: In general British Energy is in agreement with the principles of this CP in that the qualification process may be made simpler. On Agent qualification, the solution suggests that CVA MOAs may be able to opt out of some or all of the tests at their own risk as the flows will also be received by Registrants. Whilst it is true that the inability to receive CDCA flows by the CVA MOA may have a lesser impact than would be the case for ECVNA on submitting or receiving ECVAA flows, Registrants may not be aware of such issues when they appoint their CVA MOAs and that their appointments might be made under the expectation that accredited CVA MOAs have passed all such tests. Hence I am not in total support of making testing an optional feature for CVA MOAs or any other Party Agent. Additionally, Table 2 in the attachment suggests that participants should not be required to provide documentation in support of test as Central Systems will provide a test certificate. Whilst this may not be necessary where a full set of tests has been carried out, parties will be required to provide some documentary evidence where a waiver to qualification is requested. Impact on Organisation's Systems and/or Processes: No Comments: Minimal systems impact.
E.ON UK Energy Services Limited		✓	Disagree Reason: We would reject the concept of optionality for any part of the Qualification or re-

Carried out by	Agree	Disagree	Comments
			<p>qualification procedure. It is our belief that the scope of the procedure should be determined with reference to the level of CVA activity. In all cases the volume of energy is likely to be high. The risks associated with new systems and processes and changes to existing systems and processes will significantly increase in proportion to the number of metering systems operated by the candidate systems & processes.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
<p>Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;</p>	<p>✓</p>		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
<p>Centrica Energy Ltd (BGT)</p>	<p>✓</p>		<p>Agree</p> <p>Comments: Centrica agrees with the conclusions of the Expert Group, and approves of their central assumptions regarding the risks to participants. This CP should help remove potential barriers to entry for new participants. Centrica would also hope that, along with the testing programme for new entrants, full training and support continues to be given prior to their entry to the market in terms of knowledge of BETTA (for example, understanding of the credit arrangements). Any issues here could have an impact on the rest of the industry when they enter the market.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: As an existing player in the market, Centrica is not directly affected.</p>

Carried out by	Agree	Disagree	Comments
			Implementation Notification Required: 0 Days
Western Power Distribution	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
<p>SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	✓		<p>Agree</p> <p>Comments: ScottishPower support this change as it will make the CVA Qualification process more streamlined and cost effective for new participants, while recognising the minimal risk to the entire market posed by these new entrants.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: ScottishPower are already Qualified in all applicable roles and are therefore not impacted by this change.</p> <p>Implementation Notification Required: 0 Days</p>
AccuRead Ltd	-	-	<p>Not Applicable</p> <p>Reason: Does not affect us as a NHHDC/NHHDA</p>
<p>Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: February 2007 – Next Available Release</p>
Association of Meter Operators	-	-	<p>Not Applicable</p> <p>Reason: No involvement</p>

Carried out by	Agree	Disagree	Comments
E.On UK	✓		Agree

CP1161

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	-	-	Neutral
EDF Energy	✓		Agree: Yes Impact: No Implementation Notification: N/A
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	✓		Agree Comments: This is a valid housekeeping change Impact on Organisation's Systems and/or Processes: No Comments: No impacts Implementation Notification Required: 0 Days Comments: No notification required.
E.ON UK Energy Services Limited	✓		Disagree Comments: We agree with these changes to remove potential confusion and "futureproof" the document. Impact on Organisation's Systems and/or Processes: No
E.ON UK plc (SVA), 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, Severn Trent	✓		Agree Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes Implementation Notification Required: 60 Days

Carried out by	Agree	Disagree	Comments
Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd			Comments: To allow thorough testing to be completed prior to implementation date.
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		✓	Disagree Reason: The CP describes part of the solution as "2. Make a few minor changes to Section 4.5 to reflect the functioning of the new software. <u>The Central Service Provider will confirm the details during Impact Assessment.</u> " and "5. Implement any additional documentation changes <u>that the Central Service Provider may suggest during Impact Assessment.</u> " How can participants carry out a proper impact assessment if further changes are to be defined as part of the impact assessment process? Impact on Organisation's Systems and/or Processes: ? Comments: Unable to determine impact without the complete detail of the changes. Implementation Notification Required: ? Comments: Unable to determine impact without the complete detail of the changes.
Centrica Energy Ltd (BGT)	✓		Agree Comments: Centrica agrees that this change is necessary in order to update the CRD. Point 1 in the proposed solution, however, refers to a definition at the beginning of the document to 'Xsec'. This would presumably mean that any changes to the name of this software would again require a CP to be raised, which negates the aim of this CP. We would question the need for such a definition, and believe that 'current Participant Security Package' is sufficient.

Carried out by	Agree	Disagree	Comments
			<p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
Western Power Distribution	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p>
<p>SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	✓		<p>Agree</p> <p>Comments: ScottishPower support these housekeeping changes as they will ensure the CRD is correct, future proofing (to a degree) the document against further change.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: ScottishPower are already Qualified in all applicable roles and are therefore not impacted by this change.</p> <p>Implementation Notification Required: 0 Days</p>
AccuRead Ltd	-	-	<p>Not Applicable</p> <p>Reason: Does not affect us as a NHHDC/NHHDA</p>
<p>Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>	✓		<p>Agree</p> <p>Implementation Notification Required: Next Available Release</p>
Association of Meter Operators	-	-	<p>Not Applicable</p> <p>Reason: No involvement</p>

Carried out by	Agree	Disagree	Comments
E.On UK	✓		Agree

CP1164

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	✓		Disagree: The BSCP27 states in four places that the meter technical details are to be supplied on the day of the visit (3.1.8, 3.2.9, 3.3.7, 3.4.7) this is not workable and will lead to non-compliance's. We previously carried out a 2-month trial that supported this view. The TAA already have the details 20 working days before the site visit. We believe that this is sufficient for the audit to be completed correctly with the new processes. The flow diagram on the "Meter Exchange" does not have a process that will make a site compliant. Even when the resulting meter details are correct it still points to a Cat 2 non-compliance. Impact: Yes Implementation Notification: N/A
EDF Energy	✓		Agree: Yes Impact: No Implementation Notification: N/A
IMServ Europe Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	✓		Agree Comments: The alteration to BSCP27 is supported. It is felt that the responsibility for holding and maintaining MTDs should lie with the MOA as they have visibility of the metering on site. Impact on Organisation's Systems and/or Processes: Yes

Carried out by	Agree	Disagree	Comments
			<p>Comments: There will be an impact on business processes. Minimal impact on systems.</p> <p>Implementation Notification Required: 90 Days</p>
E.ON UK Energy Services Limited		✓	<p>Disagree</p> <p>Reason: In general terms we would support those changes outlined in response to issues 1-3 as whilst they will have little direct impact benefit to ourselves they will have a beneficial impact within a wider industry context. However we would like to suggest an alternative approach to issue 4 we suggest that the definition of the NC types in BSCP 27 be amended as follows</p> <ul style="list-style-type: none"> • Category 1 A non compliance that has a direct material impact on settlement • Category 2 A non compliance that has the potential to have a direct material impact on settlement <p>We suggest that the concept of an observation be removed.</p> <p>We agree that the definitions of sub-categories should be removed from BSCP 27.</p> <p>However for each NC identified the TAA should</p> <ul style="list-style-type: none"> • Define the NC • Explain why the NC has, or has the potential to have a direct material impact on settlements • Provide an estimate of the actual or potential materiality • Outline the methodology used to estimate the materiality <p>We feel that these changes better reflect a Risk based approach to the control on non compliances.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Some amendments will be required to internal procedures</p>
E.ON UK plc (SVA), Powergen Retail Ltd, Citigen (London) Ltd,	✓		<p>Agree</p>

Carried out by	Agree	Disagree	Comments
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, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd			<p>Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes</p> <p>Impact on Organisation’s Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 60 Days</p> <p>Comments: To allow thorough testing to be completed prior to implementation date.</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		✓	<p>Disagree</p> <p>Reason: What does the ‘reasons for failure or issue of non-compliance needs to be easily amended, as required’ mean? If there is an amendment we need to know what the actual changes are before agreeing to them .</p> <p>If the onus is on the MOA to provide the data (and optional for the Supplier/Registrant), the footnote ¹ <i>It is the responsibility of the Supplier or Registrant to provide the requested information to the TAA. However, the MOA can provide the information at the request of the Supplier or Registrant.</i>” needs to be changed (or removed).</p> <p>The MOA can provide the information on the day of the visit - this should be reflected in process 3.5 “Inspection Visit”.</p> <p>3.1.8; 3.3.7; 3.4.7; Is this (a) <u>and</u> (b) or (a) <u>or</u> (b)?</p> <p>Impact on Organisation’s Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
Centrica	✓		<p>Agree</p> <p>Impact on Organisation’s Systems and/or Processes: No</p>

Carried out by	Agree	Disagree	Comments
Western Power Distribution		✓	<p>Disagree</p> <p>Other Comments: According to the diagram, having introduced a stage to check if a meter has been recently changed, the process still ends up awarding a non-compliance, even if all the steps are correctly followed. There seems little point to introducing these changes if this is still the end result. As the TAA ask for the data 20 WDs before the audit date, and the MOA has 10WDs to send MTDs, it would be quite legitimate for the MTDs from the DC to be for the old meter.</p> <p>Also, it is not clear from the diagrams what happens to the check on the DC's MTD if the MOA fails to provide its copy of the MTD. What will the TAA check the DC's MTD against? Although they could check data such as the meter serial number, which is visible at the meter point, they will not be able to check items such as passwords, channel set up, pulse multipliers as they are electronic and not immediately available to the auditor.</p>
<p>SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	✓		<p>Agree</p> <p>Comments: It is acknowledged, in terms of risk to Settlements and the cost savings estimated, that it is sensible to focus on the MTDs provided by the HHDC and MOA. Notwithstanding this we would have found it beneficial if the CP had given an indication of the reasons why there are large numbers of non compliances raised due to data mismatches.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Additional requests and provision of information from the MOA.</p> <p>Implementation Notification Required: 20 Days</p> <p>Other Comments: Section 3.1.9 Information Required should state "Meter Technical Details" and "BSCP514/8.4.8a Complex Site Supplementary Information Form, where appropriate (SVA Only).</p>

Carried out by	Agree	Disagree	Comments
AccuRead Ltd	-	-	<p>Not Applicable</p> <p>Reason: Does not affect us as a NHHDC/NHHDA</p>
<p>Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited</p>		✓	<p>Disagree</p> <p>Reason: We support the change regarding points 1, 2 & 3 and we will be happy to agree change if the below comments are resolved.</p> <p>Impact on Organisation’s Systems and/or Processes: Yes</p> <p>Comments: Potential Impacts on Internal systems</p> <p>Implementation Notification Required: Next Available Release</p> <p>Other Comments: The point we would like to raise regards issue 4:</p> <p>We have concerns regarding the proposal to remove BSCP27/4.2 'Reasons for Failure or Issue of Non-Compliance' and publish information on generic non-compliances on the Elexon website. The concern centres on the change control of any information published on the website and how Parties will be made aware of any changes to this 'non-exhaustive list'. We appreciate the difficulties the TAA encounters currently where the circumstances of non-compliance do not match the list of non-compliances detailed in section 4.2 but we do not want sub-categories to be added without there being some discussion and agreement of new sub-categories.</p> <p>Before this change is implemented we would like to see detail of a process for proposing, implementing and communicating change to the sub-categories</p> <p>Also our agents would like to question whether the process map is entirely correct. Within the diagrams for “Meter Exchange” and “No Meter Exchange” it states that if the SUP and MOA MTD’s are correct or not the only outcome is a note. Surely if the MTD’s are correct then the SUP or MOA are compliant but if the MOA MTD’s are not correct this should lead to</p>

Carried out by	Agree	Disagree	Comments
			<p>Cat 2 non-compliance. The reason for this is that BSCP's 514 & 502 show the flow of MTD info between MOA and HHDC. If PWC audited and saw that HHDC were using different MTD's than those provided by MOA this would lead to a non-compliance. If HHDC's MTD's are correct then MOA's MTD's should be correct. The process map shows that MOA can have incorrect MTD's but this should be a non-compliance. npower Supply are supportive of the query raised by our agents but feel the change would not be necessary if there was visibility to the MOA of any DC non-compliances.</p>
<p>Association of Meter Operators</p>		<p>✓</p>	<p>Disagree</p> <p>Reason: Generally the AMO support this revision and have worked with Elexon to clarify these operational issues.</p> <p>The AMO agree with and support the solutions to issues 1,2 and 3.</p> <p>The AMO agree that the problem identified in issue 4 needs to be addressed but does not entirely agree with the solution.</p> <p>Firstly there needs to be some amendments to the definitions of non compliances.</p> <p>The definition of Category 1 Non compliances is quite correct but needs clarification to state that "affecting the quality of data for settlement purposes" means "it has no direct material impact on settlements".</p> <p>A similar clause needs inserting in the definition of Category 2.</p> <p>The reference to "observations" should be removed from BSCP27. These "observations" have no affect on settlements and are therefore not non compliances. They are therefore not reportable in this manner. The AMO has no objection to observations being made, some may be of interest to parties and agents (for example some safety issues could be reported here) but that should be without the BSC and BSCP27.</p> <p>These amendments to the definitions of non compliances will properly address the risk to settlements.</p> <p>We agree that the list of non compliances will need to be amended from time to time and that change management would be better administered on the Elexon website. There should however be a process for amendments to the list that involves consultation with interested parties and is not an open ticket for change by the TAA.</p>

CP1165

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	✓		Agree: We strongly support this CP as it removes a requirement that adds no benefit to the industry. The frequency of reporting of excessively large AA's should be agreed between a supplier and it's agents. Impact: No Implementation Notification: A.S.A.P
EDF Energy	✓		Agree: Current requirement to provide a daily report of valid large AAs is impractical and in reality is not required by Suppliers. It is therefore sensible to remove this obligation so that documentation reflects actual working practices and so that NHHDC Agents do not have unnecessary non-compliances raised against them. Impact: No Implementation Notification: N/A
IMServ Europe Ltd (NHH Response)	✓		Agree Impact on Organisation's Systems and/or Processes: No Other Comments: We agree that the requirement on DC's to send Large EACAAs within 1 working day (w/d) is not a sensible working practice and should be amended, however we think that the following points should be considered: - Will there be a specified date that the NHHDCs will be required to issue this monthly report? If NHHDCs are not given a date the NHHDCs report could clash with Elexon's Monthly Report, if this happens then the NHHDCs report could become unproductive. Scottish Powers proposal only refers to Large EACAAs that can are classified as "Valid" (will remain in Settlement) and "Erroneous" (can be withdrawn be the DC). No reference is

Carried out by	Agree	Disagree	Comments
			<p>made to the instances that are "Erroneous" but <u>cannot</u> be withdrawn by the DC i.e. Incorrect Change of Supply readings. We currently use the routine Large EACAA Report to highlight these for early resolution. Ideally incorrect COS reads will be replaced before the next Elexon Report is issued, if these instances are only sent on a monthly basis this might not allow Suppliers enough time to agree a new read and send on the D0300. If we are going to send incorrect COS readings more frequently then we might as well send the valid instances also.</p>
<p>British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd</p>	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: Minimal impact on systems</p> <p>Implementation Notification Required: 30 Days</p>
<p>E.ON UK Energy Services Limited</p>		✓	<p>Disagree</p> <p>Reason: We currently operate a daily report and send it to those suppliers that have not requested us to stop sending it. I reject this proposal. The idea of sending a report daily is that the supplier has the opportunity to investigate large AAs and report valid instances to Elexon as they occur. Elexon then updates their database to ensure that when the large value is reported on the NHHDA extract, the instance is not included in the materiality calculation. If this mechanism is removed, there is a potential for the forecasted materiality to increase.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: Changes would be required to internal procedures</p> <p>Implementation Notification Required: 30 Days</p>

Carried out by	Agree	Disagree	Comments
			Comments: Time required to change procedures and cascade to all affected users
E.ON UK plc (SVA), 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, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd	✓		<p>Agree</p> <p>Comments: We would suggest that the report should be produced on a monthly basis unless requested otherwise.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 60 Days</p> <p>Comments: To allow thorough testing to be completed prior to implementation date.</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p>
Centrica	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p>
SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd.	✓		<p>Agree</p> <p>Comments: ScottishPower supports this change.</p> <p>Impact on Organisation's Systems and/or Processes: No</p>

Carried out by	Agree	Disagree	Comments
ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.			<p>Comments: There will be minor changes to ScottishPower's systems and processes to allow for the change in timescales for producing / receiving reports.</p> <p>Implementation Notification Required: 0 Days</p> <p>Comments: The proposed implementation date of February 2007 is acceptable.</p>
AccuRead Ltd	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 5 Days</p> <p>Comments: Part of this process involves manual processing which could be relatively easily amended to change the frequency of reporting.</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		✓	<p>Disagree</p> <p>Reason: We would agree this change if the below comments are addressed.</p> <p>Implementation Notification Required: minimum of 6 months from agreement date</p> <p>Other Comments: We would like to see the line "where requested by Supplier" to be removed from the CP making it mandatory for DC's to provide the report on a monthly basis.</p> <p>Will this report replace the report currently provided by ELEXON on a monthly basis? If not what will be in place to stop duplication?</p> <p>Will there be timescales in place for resolution? If so what will these be?</p>

CP1166

Carried out by	Agree	Disagree	Comments
Siemens Energy Services		✓	<p>Disagree: We are in support of the proposals for dial meters in general but have major concerns for the practical implementation of these metering systems therefore cannot agree to the CP until these have been resolved:</p> <ul style="list-style-type: none">• There must be a clear responsibility line for the controlling of the time on the meter.• There is no mention of GPRS/EDGE/CDMA or TCPIP.• How is the inbound caller validated? (other than by password), i.e. Is it a requirement to use CLI, so the inbound number can be checked against the MTD's?" <p>Impact: Yes Implementation Notification: N/A</p> <div data-bbox="779 651 2085 778"><p>Question: Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p></div> <div data-bbox="779 783 2085 1342"><p>Answer: We do not believe that the current security requirements will be sufficient to enable a secure environment for dial-in meters. In dial-out mode the MO have control over the communications methods and therefore the comms addresses involved, thus a DC can be sure (with the other security criteria in place) that they are actually connecting to the desired device. The checks required by this method under the current BSCP 502 are sufficient to rid any doubt that you are talking to the correct device. In dial-in mode this may not be the case as the equipment dialing-in may be on a customers own network (such as a corporate LAN), which the MO have no control over and the DC may not know it's location, especially when NAT is being utilized. This would also be true if GPRS is being utilized as many GPRS devices use dynamic IP addressing. This can mean therefore, that a "dummy" device, such as a laptop can be employed as the dial-in device, mimicking the metering protocol and sending "random" data to the DC. This is especially true if only a text message is being expected from the device as GSM messages can also be sent from mobile devices such as Blackberry's/laptops/PDA's, so they can also be used to mimic static metering devices, without the checks required by dial-out methods to half-hourly profiling meters.</p></div> <p>We also have problems with dial-in in terms of DC faults processes and ensuring that sufficient capability is</p>

Carried out by	Agree	Disagree	Comments
			<p>in place in these dial-in devices to allow for a robust faults process to work without the need for either DC or MO to have to attend site to ascertain the true problem with the equipment. If the onus is on dial-in then it may well cause problems trying to dial-out to the device.</p> <p>On the external time source, the situation needs clarifying as to who has ultimate responsibility for synchronising the time on the meter. Multiple time synchronisations due to an external device and the master installation being out of synch will cause data errors and impact settlements accordingly. If the clock is to be synched by an external source then this should be the master device and the responsibility for synchronising the time taken from the DC. The device should also be an approved one that requires calibration periodically to ensure it is fit for purpose. No mention is made of what happens if the time synchronisation device fails, what will happen in these situations and what is the backup to be utilised?</p>
EDF Energy	-	-	Neutral
IMServ Europe Ltd	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Implementation Notification Required: 0 Days</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer. Yes. Option 3 should cover other security measures which may be as effective as the passwords currently used for outbound comms.</p>
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: Minimal impact on systems</p> <p>Implementation Notification Required: 30 Days</p>

Carried out by	Agree	Disagree	Comments
Power Ltd			<p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p> <p>It is believed that the proposed security measures are sufficient as they reflect the methods currently used in the HH market.</p>
E.ON UK Energy Services Limited		✓	<p>Disagree</p> <p>Reason: We feel that the amendments to Section 5.4.2 should not be made. Whilst it is appropriate within the COP to define meter function. It is our opinion that all other elements of the relationship between the MO, customer and/or registrant are more appropriately the subject of commercial/contractual agreements. In section 5.5.2 the external timing source should be defined and confirmation obtained that this source mirrors UTC thus confirming that the correct timing parameters are maintained.</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: If outbound communications are adopted changes would be required to agency systems.</p> <p>Other Comments: We would seek to ensure that a policy of Open Architecture is adopted to ensure that a HHDC is able to communicate with any meter that may potentially be installed by a MOA.</p>
E.ON UK plc (SVA), 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,	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes.</p> <p>Implementation Notification Required: 60 Days</p> <p>Comments: To allow thorough testing to be completed prior to implementation date.</p>

Carried out by	Agree	Disagree	Comments
Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd			<p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p> <p>Yes the proposed security options are sufficient however it would be beneficial if they were more fleshed out.</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		✓	<p>Disagree</p> <p>Reason: 5.5.2 Time Keeping - what external source would an outstation be automatically synchronising itself with? Would the source be subject to the same governance as the Settlement Instation?</p> <p>5.6 Communications - 3. Some other means of providing a similar intrinsic level of security. How is it determined if 'other means' provide a similar intrinsic level of security? This seems a bit vague.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer. No – no detail specified</p>
Stark Software International HHDC/HHDA	✓		<p>Agree</p> <p>Comments: We believe that this will benefit customers and could potentially reduce costs whilst not interfering with existing conventional HHDC processes.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: No mandatory system changes are required by parties as a result of this CP.</p>

Carried out by	Agree	Disagree	Comments
			<p>Implementation Notification Required: N/A</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p> <p>Yes. A competent authentication scheme that determines the identity of the recipient is adequate security and improves significantly on the common 'default' arrangements that prevail under COP5. This clause 5.6.2 could be strengthened to say: "An authentication scheme based on the identity of the local or remote party <i>and/or password</i>" if this is thought to provide more confidence.</p>
Centrica	-	-	<p>Neutral</p> <p>Impact on Organisation's Systems and/or Processes: No</p>
Western Power Distribution		✓	<p>Disagree</p> <p>Other Comments: 5.4.2 This change has nothing whatsoever to do with outbound comms and is not explained or justified by the CP. If this change is considered desirable then, as a matter of principle, it should be consulted upon in the proper way.</p> <p>5.5.2 What ensures the accuracy of the external reference source? A standard for this needs to be set, eg: maintained to within x seconds of UTC.</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer</p> <p>NO.</p> <p>5.6 point 2 (and hence also point 3) is less stringent than the requirements currently in appendix D. Either the requirements in appendix are valid or they are not. If they are not needed then the reasons why should be stated in the CP.</p>
SAIC Ltd. Response provided on behalf of:	✓		<p>Agree</p> <p>Comments: The changes to the CoP5 seem a sensible approach to include "inbound" communications.</p>

Carried out by	Agree	Disagree	Comments
Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.			<p>It would be beneficial at this time to have visibility of the proposed changes to BSCP502.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p> <p>We believe that it would be necessary for security measures 2 and 3 to be subject to approval by either ISG or SVG. This would provide some assurance that they are adequate.</p>
AccuRead Ltd	-	-	<p>Not Applicable</p> <p>Reason: Does not affect us as a NHHDC/NHHDA</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited			<p>Other Comments:</p> <p>We would suggest changes be made to section 5.5.2 of the COP5 document to include a link or reference to an approved list of external sources (for the outstation to automatically synchronise itself with) possibly kept on the Elexon website to avoid confusion.</p> <p>MOA have concerns over the governance of any inbound communications lines as these can easily be used fraudulently if outgoing calls are not barred. In the case of Change of Agent process the new MOA would need to be told which lines have outgoing calls barred and which don't.</p> <p>Who is going to pay the cost of the inbound calls? Previously DC paid for outbound calls but the comms lines will be owned by MOA. I can't see MOA wanting to pay these costs.</p> <p>We are concerned that the term 'Smart Metering' is not defined in this CP as this is more commonly a NHH term and should not be used in a HH CP. This CP is a request to amend COP5 and BSCP514 to allow functionality change for HH meters. Perhaps the issue is confused because 'Smart' has been introduced but currently has no place within the HH market nor is the 'Smart' Industry defined yet.</p> <p>Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer.</p>

Carried out by	Agree	Disagree	Comments
			<p>No</p> <p>There have been cases where phone lines have been used to make calls fraudulently and strong security would be needed to ensure this does not happen in the future. This needs to be addressed as well as the risk to interfering with the data and accessing DC systems</p>
<p>Association of Meter Operators</p>		<p>✓</p>	<p>Disagree</p> <p>Reason: The CP as currently drafted only addresses changes to CoP5 if the principle is accepted then similar changes should be applied to CoP1, 2, 3, 5 & 6.</p> <p>The CP as currently drafted mentions checking BSCP502 without being explicit on the checks. There may also be a need to check the BSC, SL110, SL180, BSCP514 and other CSDs.</p> <p>The change implies that access to interrogate the meter is possible, but does not make it a requirement. Such that the SMS data has failed for some reason is the alternative to make an 'call' from the data retrieval software to the meter, or is a site visit required?</p> <p>The changes to timing need to ensure any time resets are flagged in the same way as by an inbound communication – so that the DC can identify that a time reset has occurred in particular time period – see BSCP502 appendix 4.1. The source of time data is not defined in the CoP, nor is the frequency of checking/correcting – this is implicit by the interrogation by the HHDC, although this can vary from daily to annually for a locally collected meter, in this approach there is probably a need to define how often the time is checked/corrected.</p> <p>There is no mention of the password being checked in BSCP502 appendix 4.1, although this is implicit to enable data retrieval, the implication is that the Level 1 password (defined in CoP5 section 5.6) needs to be passed to the DC with the string of data, and validated prior to processing.</p> <p>The key validation in interrogating a meter is to check/compare the Device ID – this data needs to be carried across in the text message, as does all the other information to allow that same validations defined in BSCP502 appendix 4.1</p> <p>Worth also including GPRS in the list of radio data networks within the changes to 5.6.2</p> <p>Is it intended that HHDCs need to go through 'protocol' approval prior to using this method of comms, as envisaged by CoP5 section 5.6. and BSCP601 – Metering Protocol Approval & Compliance Testing.</p> <p>These issues need a broader debate and resolution, although having satisfied these concerns to maintain the integrity of Settlement data the AMO is supporting of the underlying reason for the change for the introduction of using inbound communication via SMS or GPRS or similar means.</p>

Carried out by	Agree	Disagree	Comments
			<p data-bbox="772 276 2094 347">Do you believe that the proposed security options in section 5.6 are sufficient? Please provide reasons for you answer</p> <p data-bbox="772 387 2094 458">It is unclear what item 2 is? Who are local & remote party in this context? Currently, with the information available, the answer would be no</p>

CP1167

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	-	-	Neutral
EDF Energy	-	-	Neutral
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	-	-	Minimal impact on systems
E.ON UK Energy Services Limited	-	-	Not Applicable Reason: We foresee no impact on any agency service Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days
E.ON UK plc (SVA), 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, Severn Trent Energy Ltd, TXU Europe (AHG) Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: Yes Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes. Implementation Notification Required: 60 Days Comments: To allow thorough testing to be completed prior to implementation date.

Carried out by	Agree	Disagree	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 Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days
Centrica Energy Ltd (BGT)	✓		Agree Comments: Centrica agrees to this change, and believes that the SVG provides sufficient assurance for each suggested weather station. Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days
SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		Agree Comments: This change will reflect both the intent of the code and the current operational practice. However, although born of necessity, the risks of inaccurate temperature data applying must surely increase whenever this facility is relied upon. We would therefore urge the SVG to only consider use of this practice as a last resort and not to treat it as an operational norm. Moreover, while we recognise that the industry currently must rely on a third party to provide this data, such reliance could effectively leave the industry open to the impacts of any inadequacies in that provision i.e. if the commercial arrangements surrounding that provision failed to offer sufficient leverage to ensure that the industry's needs are being satisfactorily met. Also, we believe a review of distance between proposed alternate weather stations and analysis of temperature trends to confirm that no material adjustment would arise by

Carried out by	Agree	Disagree	Comments
			<p>applying alternate temperature data as a default would be required.</p> <p>To this end it may be prudent to look to the future of profiling in general and, perhaps, to the role of new technology metering, as a means by which much more detailed and localised temperature information could be gathered.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: As this change reflects current industry practice, its implementation should have no impact on Scottish Power's systems or processes.</p> <p>Implementation Notification Required: 10 Days</p> <p>Comments: This will allow time for the documentary changes to be recorded.</p>
AccuRead Ltd	-	-	<p>Not Applicable</p> <p>Reason: Does not affect us as a NHHDC/NHHDA</p>
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p>Agree</p> <p>Implementation Notification Required: Next Available Release</p>
Association of Meter Operators	-	-	<p>Not Applicable</p> <p>Reason: No involvement</p>

CP1168

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	✓		Agree: Yes Impact: Yes Implementation Notification: 90 Days
EDF Energy	✓		Agree: Yes, This change will provide greater clarity so would seem to be a sensible idea. Impact: Yes, Some system changes would be required to ensure readings are deemed as per requirements detailed. Implementation Notification: 90 Days
IMServ Europe Ltd (NHH Response)	-	-	Neutral Impact on Organisation's Systems and/or Processes: No Other Comments: On a Change of Measurement Class, coincident with a CoS, we as a NHHDC would receive a D0151 from our Supplier to De-appoint us as the NHHDC. We would treat this as a normal de-appointment and await the D0170 from the new DC requesting the D0152 D0010 information. We would have no way of knowing that the site had changed measurement class as it is not indicated any where in the D0151. Unless a final read D0010 was received from the MOP we would not send a D0010 flow out and we would not know to deem. We therefore do not believe the change will have any impact on our current processes. On a Change of Measurement Class without a coincident CoS, we would receive a D0151 from the Supplier with a code of MC (Change of Measurement Class (non coincident with CoS)), our system will wait one month for a final read from the MOP, if one is not received we will deem a read on the COMC date. We would not be expecting to receive a D0086 from the new DC as this is a HH DC.

Carried out by	Agree	Disagree	Comments
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	-	-	Minimal impact on systems
E.ON UK Energy Services Limited	✓		<p>Agree: Change is required to avoid ambiguity</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p> <p>Other Comments: This process is extremely difficult to operate as the NHHDC is not always told that a de-appointment relates to a change of measurement class, especially when there is a Change of Supplier involved. Our current procedures are to send a D0086 when we have determined that there has been a CoMC, which may not be within the stated time scales.</p> <p>The description of this CP refers to BSCP504 section 3.1.1 this should read section 3.3.1</p> <p>In step 3.3.1.11 It would be beneficial to change "Final deemed meter reading" to Deemed final meter reading to avoid confusion and to reflect the terminology established in 3.3.1.10</p>
E.ON UK plc (SVA), 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, Severn Trent Energy Ltd, TXU Europe (AHG)	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: Yes</p> <p>Comments: This change is not anticipated to have a significant or detrimental impact on our systems or processes.</p> <p>Implementation Notification Required: 60 Days</p>

Carried out by	Agree	Disagree	Comments
Ltd, TXU Europe (AHGD) Ltd, TXU Europe (AH Online) Ltd, Economy Power, Western Gas Ltd, Powergen Retail Gas (Eastern) Ltd			Comments: To allow thorough testing to be completed prior to implementation date.
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 Impact on Organisation's Systems and/or Processes: No Implementation Notification Required: 0 Days
Centrica	✓		Agree Impact on Organisation's Systems and/or Processes: No
SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓		Agree Comments: ScottishPower supports this change. Impact on Organisation's Systems and/or Processes: No Comments: This change clarifies the information required in section 3.3.1.7 and removes any confusion with section 3.3.1.8. This will not have any impact in systems or processes. Implementation Notification Required: 0 Days Comments: The proposed implementation date of February 2007 is acceptable.
AccuRead Ltd	✓		Agree Impact on Organisation's Systems and/or Processes: Yes

Carried out by	Agree	Disagree	Comments
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: Next Available Release</p> <p>Other Comments: We agree with the proposal that deeming should only take place if no readings are received from the MOA but the supplier should have a process to inform the NHHDC if they do have reading(s) from the removed meter.</p>
Association of Meter Operators	-	-	Neutral

CP1169

Carried out by	Agree	Disagree	Comments
Siemens Energy Services	-	-	Neutral
EDF Energy	✓		<p>Agree: Yes Impact: No Implementation Notification: N/A</p> <div style="border: 1px solid black; padding: 5px;"> <p>Question: Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference.</p> </div> <div style="border: 1px solid black; padding: 5px;"> <p>Answer: Although an automated solution would be preferred it is felt that benefits of selecting one of these options do not outweigh their costs. With this in mind we agree that most pragmatic solution is to go with option 1.</p> </div>
British Energy Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power and Energy Trading, British Energy Direct Ltd, Eggborough Power Ltd	✓		<p>Agree</p> <p>Comments: The changes described in this CP affect Central Systems only, and I would support any changes which might result in an earlier ability to disapply ECVNs within day. Given that there is an expectation that such a process will be used rarely, Option 1 should be supported on the basis of significantly reduced costs, albeit with a less favourable affect on Credit Calculations than the other options.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Comments: Minimal impact expected on systems and business processes.</p> <p>Implementation Notification Required: 0 Days Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference. British Energy supports Option 1. See comments above.</p>

Carried out by	Agree	Disagree	Comments
E.ON UK Energy Services Limited	-	-	<p>Not Applicable</p> <p>Reason: We foresee no impact on any agency service</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓		<p>Agree</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 1 Month</p> <p>Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference. Option 1</p>
Centrica Energy Ltd (BGT)	✓		<p>Agree</p> <p>Comments: Centrica agrees that there needs to be a robust process for the disapplication of contract notifications in the event of party default. It is a concern that there appears to be such a fundamental mismatch between the requirements of the BSC and the capabilities and design of the ECVAA system, particularly when it relates to events such as party defaults, which carry a high risk for other Parties.</p> <p>Impact on Organisation's Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p> <p>Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference. The ideal solution would be an approach which did not require an outage, and which enabled disapplication of the notifications within a very short timescale. Options 2a/2b and 3 come closest to this, but the costs presented are prohibitive, and two of the options require an outage. Parties may well need to trade their way out of positions with defaulting parties - outages would prevent them from doing so and therefore negate</p>

Carried out by	Agree	Disagree	Comments
			<p>these options.</p> <p>Centrica therefore approves of Elexon’s recommended option 1. While appreciating that there may be a delay in processing the disapplication, we recognise that the most important aim going forward is to remove the contracts from ECVAA from the relevant point.</p> <p>Given that there will be issues around credit indebtedness levels during this process, we believe that it is essential that parties have regular communications from Elexon during the progress of the disapplication, outlining its associated impacts on credit. It might also be appropriate for Elexon to publish a guidance note on its own and Logica’s internal processes upon approval of this CP, to avoid any confusion if the process is invoked.</p>
<p>SAIC Ltd. Response provided on behalf of: Scottish Power UK plc ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	✓		<p>Agree</p> <p>Comments: ScottishPower agree with this change as it will help to formalise further the Default Process.</p> <p>Impact on Organisation’s Systems and/or Processes: No</p> <p>Implementation Notification Required: 0 Days</p> <p>Other Comments: ScottishPower would wish to see a minimum of impact to the availability of ECVAA when a Default is notified.</p> <p>Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference.</p> <p>ScottishPower prefer option 1 as it is the most appropriate solution to the problem. The frequency of disapplications is such that a fully automated system at large cost cannot be justified.</p> <p>Any outage to the ECVAA system is undesirable. Both options 1 and 2a would allow the system to be available while future contracts are being unravelled, even though the credit position of parties may not be accurately reported. We believe this to be preferable. Inaccurate credit position, although undesirable, is not an insurmountable problem.</p> <p>It is difficult to see the financial benefits of option 2a over option 1 as ECVAA operational costs for the effort</p>

Carried out by	Agree	Disagree	Comments
			required to manually enter the VNNR's has not been provided, however if option 2a were proved to be more cost effective then we would support it instead. The frequency of large participants entering Default is so low (twice since 2001), coupled with the relatively low number of small participants left in the market who could enter Default means we do not believe the five times cost increase of 2a over 1 can be justified.
AccuRead Ltd	-	-	Not Applicable Reason: Does not affect us as a NHHDC/NHHDA
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓		Agree Implementation Notification Required: Next Available Release Other Comments: Can an I028 flow be sent to report the change when this happens? Please indicate which option out of Option 1, 2a, 2b or 3 you prefer? Please give reasons for your preference. Option 1 – all other options have a large cost which would be hard to justify when the occurrences of default is relatively rare
Association of Meter Operators	-	-	Not Applicable Reason: No involvement
E.On UK	✓		Agree