

ASSESSMENT REPORT for Modification Proposal P222 'Provision of EAC and AA data to Distributors'

Prepared by: P222 Modification Group

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Proposed Modification P222 seeks to provide Licensed Distribution System Operators (LDSOs) with Estimated Annual Consumption (EAC) and Annualised Advance (AA) information through placing a specific obligation on the Supplier (via their Non Half Hourly Data Collector) to send a D0019 'Metering System EAC/AA data' flow at the same time as it is sent to the Supplier and Non Half Hourly Data Aggregator.

Alternative Modification P222 seeks to provide LDSOs, who wish to receive it, with a snapshot of EAC data through placing a specific obligation on the Supplier (via their Non Half Hourly Data Aggregator) to send a new data flow on CD. This would be sent quarterly.

The Modification Group (the 'Group') also obtained costs of a non-BSC solution, and identified two methods that could currently be used without any Code changes for LDSO's to obtain 'D0019-equivalent data'. These are included for information.

MODIFICATION GROUP'S RECOMMENDATIONS

The P222 Modification Group invites the Panel to:

- **AGREE** a provisional recommendation that **neither** the Proposed or Alternative Modification P222 should be made;
- **AGREE** a provisional Implementation Date for Proposed Modification and Alternative Modification P222 of **25 June 2009** if an Authority decision is received on or before 19 September 2008, **or 5 November 2009** if the Authority decision is received after 19 September 2008 but on or before 20 February 2009;
- **AGREE** the draft legal text for Proposed Modification P222;
- **AGREE** the draft legal text for Alternative Modification P222;
- **AGREE** that Modification Proposal P222 be submitted to the Report Phase; and
- **AGREE** that the P222 draft Modification Report be issued for consultation and submitted to the Panel for consideration at its meeting of 12 June 2008.

¹ The current version of the Code can be found at <http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx>.

CONTENTS TABLE

Summary of Impacted Parties and Documents	3
1 P222 Group Summary.....	4
2 Description of Modification.....	6
2.1 Background	6
2.2 Proposed Modification.....	7
2.3 Alternative Modification.....	8
3 Areas Raised by the Terms of Reference	10
3.1 Confirming the Proposed Solution	10
3.2 Benefits and Avoided Costs of a Central Systems Solution.....	11
3.3 Benefits of Proposed Solution data flow (D0019) compared with existing data available to LDSOs	14
3.4 MRA and Data Transfer Network/Catalogue	16
3.5 Changes Since P043	16
3.6 Non-BSC solution – DCUSA change	17
3.7 Cost Recovery	18
3.8 Implementation Approach and Costs.....	18
3.9 Legal Text	20
4 Assessment of Modification Against Applicable BSC Objectives	20
4.1 Proposed Modification.....	20
4.2 Alternative Modification.....	22
4.3 Final Recommendation to the Panel	24
5 Terms Used in this Document	24
6 Document Control.....	25
6.1 Authorities	25
6.2 References	25
Appendix 1: Draft Legal Text	26
Appendix 2: Process Followed	26
Appendix 3: Results of Assessment Procedure Consultation	30
Appendix 4: Results of Impact Assessment.....	33
Appendix 5: Data items for new data flow: Alternative Modification.....	37

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as the Modification Group has been able to assess, the following parties/documents would be impacted by P222.

Please note that this table represents a summary of the full impact assessment results contained in Appendix 4.

Parties	Sections of the BSC	Code Subsidiary Documents
Distribution System Operators <input checked="" type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Interconnectors <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Licence Exemptable Generators <input type="checkbox"/>	D <input type="checkbox"/>	Party Service Lines <input type="checkbox"/>
Non-Physical Traders <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input checked="" type="checkbox"/>
Suppliers <input checked="" type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Party Agents	H <input type="checkbox"/>	Core Industry Documents
Data Aggregators <input checked="" type="checkbox"/>	I <input type="checkbox"/>	Ancillary Services Agreement <input type="checkbox"/>
Data Collectors <input checked="" type="checkbox"/>	J <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
Meter Administrators <input type="checkbox"/>	K <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
Meter Operator Agents <input type="checkbox"/>	L <input type="checkbox"/>	Distribution Code <input type="checkbox"/>
ECVNA <input type="checkbox"/>	M <input type="checkbox"/>	Distribution Connection and Use of System Agreement <input checked="" type="checkbox"/>
MVRNA <input type="checkbox"/>	N <input type="checkbox"/>	Grid Code <input type="checkbox"/>
BSC Agents	O <input type="checkbox"/>	Master Registration Agreement <input checked="" type="checkbox"/>
SAA <input type="checkbox"/>	P <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	Q <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	R <input type="checkbox"/>	BSCCo
ECVAA <input type="checkbox"/>	S <input checked="" type="checkbox"/>	Internal Working Procedures <input type="checkbox"/>
CDCA <input type="checkbox"/>	T <input type="checkbox"/>	BSC Panel/Panel Committees
TAA <input type="checkbox"/>	U <input type="checkbox"/>	Working Practices <input type="checkbox"/>
CRA <input type="checkbox"/>	V <input type="checkbox"/>	Other
SVAA <input type="checkbox"/>	W <input type="checkbox"/>	Market Index Data Provider <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	X <input type="checkbox"/>	Market Index Definition Statement <input type="checkbox"/>
BSC Auditor <input type="checkbox"/>		System Operator-Transmission Owner Code <input type="checkbox"/>
Profile Administrator <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
Certification Agent <input type="checkbox"/>		
Other Agents		
Supplier Meter Registration Agent <input type="checkbox"/>		
Unmetered Supplies Operator <input type="checkbox"/>		
Data Transfer Service Provider <input checked="" type="checkbox"/>		

1 P222 GROUP SUMMARY

The key conclusions of the P222 Modification Group ('the Group') are outlined below.

The Group:

- **AGREED** by **MAJORITY** that the Proposed Modification **would not** better facilitate the achievement of any of the Applicable BSC Objectives as there were no arguments that could be made to support it;
- **AGREED** that an Alternative Modification should be developed in order to provide site specific consumption data which has been subject to a higher degree of validation than the D0019 and can be provided at a lower industry cost therefore meeting the requirements of the Proposal;
- **AGREED** by **MAJORITY** that the Alternative Modification **would not** better facilitate the achievement of any of the Applicable BSC Objectives as there were no arguments that could be made to support it;
- Were **SPLIT** as to whether the Alternative Modification better facilitates the achievement of the Applicable BSC Objectives than the Proposed Modification. Members who believed the Alternative was better than the Proposed did so because it would result in a more efficient solution, because of the:
 - expected lower costs to the industry as a whole;
 - lower frequency of data provision; and
 - data had gone through additional validation.

Members who believed the Alternative was not better than the Proposed did so because they believed there were no arguments that could be made against the Applicable BSC Objectives;

- **NOTED** that circumstances had, to some degree, changed since the rejection of P043 by the Authority in 2001. This is primarily due to the emergence of independent LDSOs, additional business separation, and increased distributed energy. However, the degree of change does not appear to have resulted in full support from LDSO's for the receipt of the consumption data proposed by P222;
- **NOTED** that the implementation costs for the Proposed Modification were made up of £3,740 BSCCo costs, £25,000 annual cost for extra Data Transfer Network traffic, a range of costs to NHHDCs of £6,000 to £45,000, and costs to LDSOs of £5,000 to £7,000;
- **NOTED** that the implementation costs for the Alternative Modification were made up of £95,000 BSCCo and BSC service provider (NHHDA software), costs for NHHDA² between £5,000 and £25,000, and costs to LDSOs of up to £5,000;
- **AGREED** that, despite the higher BSCCo costs, the Alternative Modification would be **likely** to have lower overall industry costs;
- **OBTAINED** costs for a non-BSC solution in which the DCUSA would be changed. These costs are estimated to include £31,000 for a DCUSA change to run through the change process, costs to LDSOs of up to an additional £2,000 over the P222 costs, and costs to Suppliers of £20,000 to £45,000;
- **AGREED** an Implementation Date for the Proposed/Alternative Modification of 25 June 2009 if an Authority decision is received on or before 19 September 2008 or 5 November 2009 if an Authority decision is received after 19 September 2008 but on or before 20 February 2009; and

² These costs were based on an Impact Assessment where the data would be provided from NHHDA to LDSOs using the DTN.

- **AGREED** that the draft legal text delivers the intended solution for the Proposed/Alternative Modification.

The main pros and cons of the P222 Proposed and Alternative solutions identified by the Group and from the consultation are summarised in the table below. More detail of the Group's views regarding the merits of the Proposed and Alternative Modification can be found in Section 4.

Pros	Cons
BSC – Majority <ul style="list-style-type: none"> • None identifiable. 	BSC – Majority <ul style="list-style-type: none"> • No benefits proven to exist so cannot be said to better facilitate the Applicable BSC Objectives. • Limited use of the information by LDSOs erodes any benefits that are perceived to exist.
BSC – Minority <ul style="list-style-type: none"> • Facilitates new entry of distributed/embedded generation via allowing for more cost reflective Distribution Use of System charges. (objective (c)) • Improved granularity of metering data to LDSOs can help to highlight errors prior to this information being used in Settlement. This would provide for fairer arrangements that promote competition. (objective (c)) • P222 would prevent the duplication of systems (LDSOs who do not process D0010s currently would need to replicate existing NHHDC systems to do this). (objective (d)) 	BSC – Minority <ul style="list-style-type: none"> • Increased ongoing cost and contractual risk to Suppliers to manage a new obligation would be detrimental to new entry and competition. (objective (c)) • An increase in BSC operating costs are more likely than a decrease. (objective (d))
Non-BSC – Minority <ul style="list-style-type: none"> • Reduce the need for boundary metering. • Improve LDSOs network planning and operation. 	

A description of the P222 solution is provided in Section 2. Further information regarding the Group's discussions of the areas set out in the P222 Terms of Reference is contained in Section 3, including details of the Group's recommended implementation approach.

A copy of the Group's full Terms of Reference can be found in Appendix 2, whilst a summary of the responses to the Assessment Procedure consultation and impact assessment can be found in Appendices 3 and 4 respectively.

2 DESCRIPTION OF MODIFICATION

This section outlines the solution for the Proposed Modification and Alternative Modification as developed by the Modification Group.

For a full description of the original Modification Proposal as submitted by The Electricity Network Company Limited ('the Proposer'), please refer to the P222 Initial Written Assessment (IWA).

2.1 Background

2.1.1 Provision of consumption data

Although the Proposed solution highlights a particular data flow, it was clarified early in the process that the Proposer was only seeking to obtain a valid estimate of site specific consumption data on a regular basis. Furthermore they wished to avoid having to repeat the process of calculating such an estimate, where this data was already being calculated by other participants, and also to try to find the most efficient way of achieving this. This led to the development of an Alternative solution.

2.1.2 Modification Proposal P043

In 2001 Western Power Distribution raised P043 'Provision of Annualised Advance and Estimated Annual Consumption Data'. P043 sought to modify the BSC such that Non Half Hourly Data Collectors (NHHDCs) would be required to send Metering System Annualised Advance (AA) and Estimated Annual Consumption (EAC) data to the Distributor.

Prior to business separation of Supplier and Distribution businesses the LDSOs had access to this data. It was suggested that LDSOs require an accurate forecast of consumption to enable a more accurate calculation of loading on its network and therefore forecast demand. The Proposer felt that the D0019 'Metering System EAC/AA data' flow was the best source for this data.

Ofgem rejected P043 noting that "at present... the proposal may lead to additional overall costs and that such costs will have to be borne by other parties" and that "it is questionable whether the required change necessary to provide such data is warranted relative to the expense that might be incurred". Ofgem suggested that the provision of such data could be achieved outside the BSC and noted that a change could be proposed to the Distribution Use of System Agreement, to require Suppliers to provide the data.

2.1.3 Issue 31

In November 2007, Issue 31 was raised to reconsider the provision of EAC/AA data to LDSOs via the D0019 flow. The Proposer advised that, as an Independent LDSO, their Distribution System is connected to that of another host LDSO. It is therefore felt necessary for both the Independent LDSO and the host LDSO to obtain accurate information regarding how much energy is transported across the boundary between their Systems for the purposes of system planning. In addition it was argued that Independent LDSOs need to understand the demands on a site-by-site basis for network planning and operation reasons.

The Issue 31 Group noted that LDSOs receive the D0010 'Meter Readings' data flow, however the Proposer indicated this data may be two years out of date and may need to be cleansed. It was also acknowledged that LDSOs can request Suppliers to provide consumption information on an ad-hoc basis through bi-lateral agreement, but this is likely to be expensive. It was therefore felt that the D0019 could potentially be the best source of this data.

The Group noted that circumstances had changed since 2001 with the emergence of Independent LDSOs and that, when P043 was raised, only the LDSO who proposed P043 had undergone business separation. Therefore other LDSOs arguably still had access to the required data.

The Issue 31 Group discussed potential alternative solutions that might be considered under the BSC or alternatively under the Distribution Connection and Use of System Agreement (DCUSA). On balance it was felt that the original suggestion was the most appropriate solution to consider under a Modification.

It was observed that the P043 process had not provided costs for the changes proposed nor draft legal text. The Group confirmed that the BSC would need to be revised to ensure the obligation to provide D0019 data to LDSOs was clear.

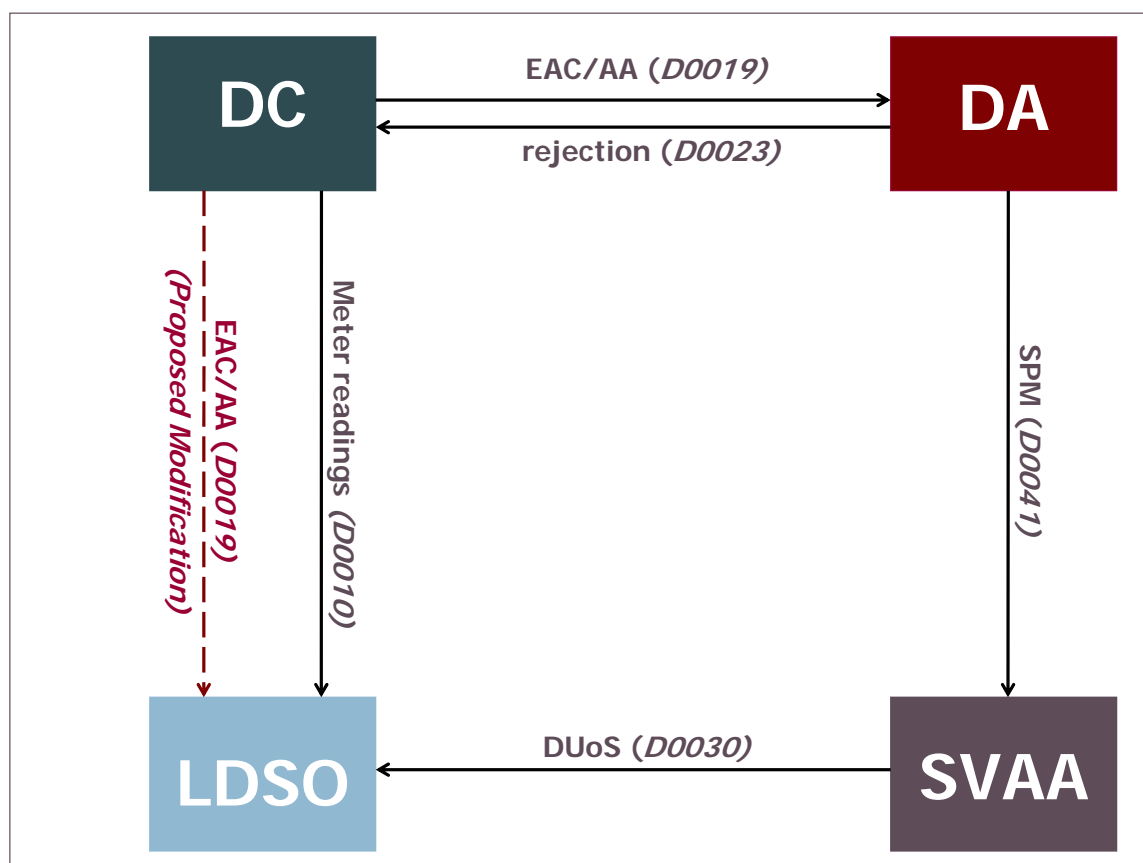
A majority of the Issue 31 Group members supported a Modification Proposal being raised in this area to allow for the costs and benefits to be better understood. The Issue 31 report is available here: [ELEXON - Provision of Annualised Advance and Estimated Annual Consumption Data to LDSO](#)

2.2 Proposed Modification

P222 seeks to ensure that LDSOs receive EAC or AA data for Metering Systems located within their Distribution Network. It is proposed that this information be provided by the Non Half Hourly Data Collector (NHHDC) sending a D0019 flow to the relevant LDSO. This can be seen as the red dotted line in Figure 1 below.

P222 proposes that the receipt of the D0019 flow would provide the desired site specific consumption data for Non Half Hourly metered sites.

Figure 1. Proposed modification - D0019 flow from NHHDC to LDSO



The NHHDC would identify relevant LDSOs to receive the D0019 flow. This would be achieved by using the LDSO ID contained in the Meter Point Administrator Number (MPAN). LDSOs would only receive D0019 flows where their LDSO ID appears in these first two digits of the core MPAN.

When the NHHDC sends D0019 flows to Suppliers and NHHDA, the NHHDC would be required to also send the D0019 data to the relevant LDSOs³. This flow would be sent across the Data Transfer Network (DTN). Via the obligation on the Supplier, it will be mandatory for the NHHDC to provide the information to the LDSO.

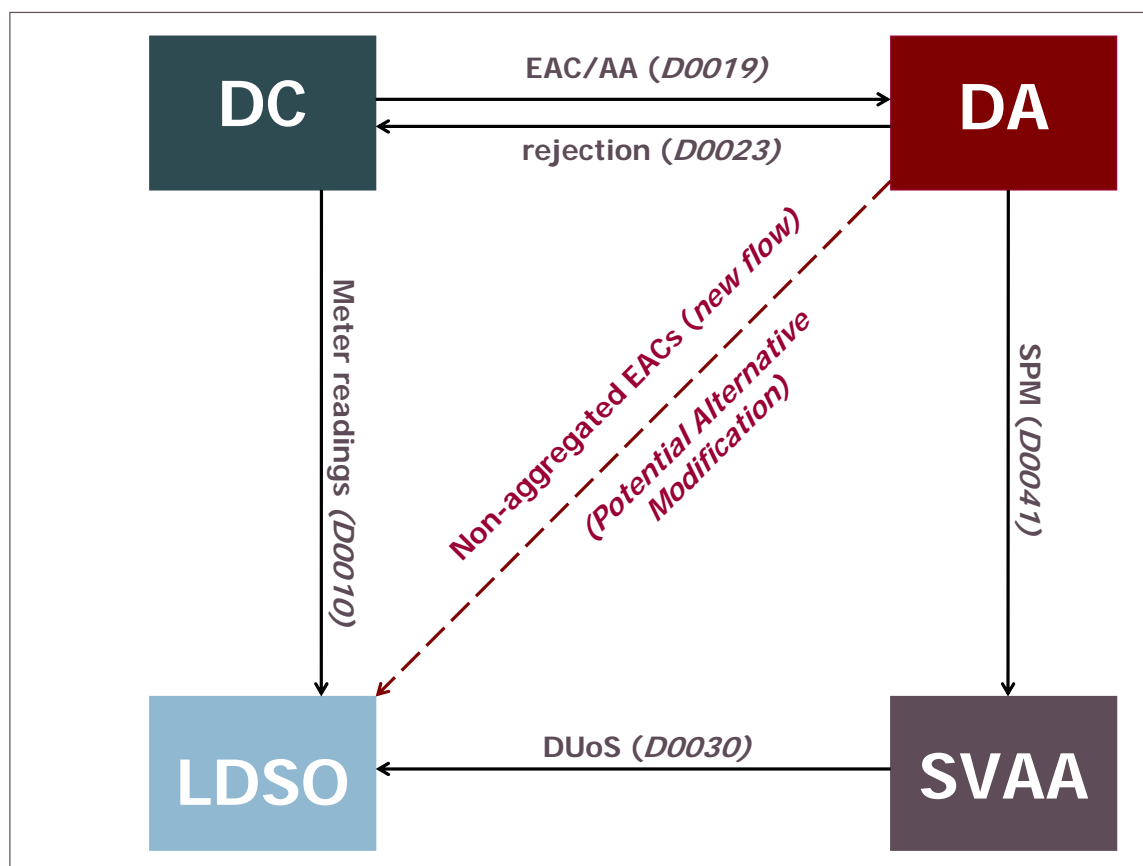
This would require an update to the Data Transfer Catalogue (DTC) and DTN. The DTC and DTN would require amendment to ensure it was clear that the LDSO is to be an additional recipient of the D0019 data.

For the avoidance of doubt, the new flow from the NHHDC to the LDSO would be accepted by the LDSOs on an 'as is' basis, and there would be no formal process for the LDSO to query the accuracy of the data⁴. There would be no additional obligations placed on Suppliers or NHHDCs.

2.3 Alternative Modification

As with the Proposed Modification, the Alternative Modification also seeks to ensure that LDSOs receive EAC data for Metering Systems located within their Distribution Network. It is proposed that this information be provided by the Non Half Hourly Data Aggregator (NHHDA) sending a new flow to the relevant LDSO. This can be seen as the red dotted line in Figure 2 below. The data items of the new flow are contained in Appendix 5 and will detail Non-Half Hourly consumption EACs⁵ by GSP Group, Profile Class, and Line Loss Factor. This will provide site specific consumption data to LDSOs.

Figure 2. Alternative Modification – New flow from NHHDA to LDSOs



³ The relevant DSOs would therefore receive a D0019 flow every time that a D0019 is generated by the NHHDC and provided to the NHHDA in accordance with Section S of the BSC.

⁴ Although this would not prevent the LDSO from raising a query if it wished to do so.

⁵ The flow will contain EAC data as opposed to AA data. This is due to the EAC being a better guide to the customer's consumption. This is explained with an example in Appendix 5.

LDSOs that wish to receive this information would have to 'opt in', by notifying the Supplier and NHHDA⁶ in writing that it requires the data. The NHHDA would then identify the relevant LDSOs to receive the new flow. This would be based on the LDSO ID contained in the MPAN. LDSOs should only receive this new flow where their LDSO ID appears in these first two digits of the core MPAN.

The new flow would be required to be sent quarterly to any LDSOs who have opted to receive it. This would be sent on (or the first business day after) 1 May, 1 August, 1 November, and 1 February of each year⁷. The data to be captured in the new flow would be a snapshot of the EAC data available on that day. This flow would be sent by password protected CD from the NHHDA to the relevant LDSO. The Alternative Modification would therefore require a change to the SVA Data Catalogue, where the new flow would need to be added.

For the avoidance of doubt, the new flow from the NHHDA to the LDSO would be accepted by the LDSOs on an 'as is' basis and there would be no formal process for the LDSO to query the data. There would be no additional obligations placed on Suppliers or NHHDA in this area.

For the Alternative Modification, the Group noted the following additional benefits⁸ over and above the Proposed:

- Lower overall industry costs from only requiring a change to one piece of software for the NHHDA (plus some testing costs) as compared to multiple software changes for NHHDCs;
- The information will come from the NHHDA which means it will already have passed validation;
- Only sending this information quarterly would mean that there is less data to process, reducing costs on both the side of producing the information and in receiving it. Requiring LDSOs the ability to opt in also will reduce ongoing costs;
- LDSOs who do not wish to receive the data need to take no action;
- The costs of the Alternative are mainly from the one-off cost to change the NHHDA software. However the costs of the Proposed require all NHHDCs to change their processes and systems separately; and
- Providing the information on a CD means there is no cost to transfer data across the DTN.

The Group also noted that if few LDSOs chose to opt in under the Alternative Modification, any benefits identified in Section 3.2 that actually eventuate, would be eroded.

⁶ It was highlighted that, as initially drafted, the Alternative Modification gave the LDSOs the ability to opt out of receiving the information rather than requiring them to 'opt in'. This would mean that an obligation would be placed on Suppliers to provide the information unless notified by the LDSO that they did not want it. This prompted the Group to consider whether it was appropriate to have an 'opt out' or 'opt in' ability for the LDSOs. The Group believed that it was more appropriate to have LDSOs opt in, and for the LDSO to inform the Supplier and the NHHDA were they to opt in.

⁷ Note that the reason for selecting 1 May is that many meter readings will be submitted quarterly based on the financial year that starts on 1 April. Taking a snapshot on 1 May would allow for those meter readings to be captured in the data sent to the DSOs.

⁸ Note that this is not a reference to BSC benefits. Discussions against the Applicable BSC Objectives is contained in Section 4.

3 AREAS RAISED BY THE TERMS OF REFERENCE

This section outlines the conclusions of the Modification Group regarding the areas set out in the P222 Terms of Reference.

In this section, a reference to 'P222' or 'P222 data' indicates the discussions relate to both the Proposed Modification and Alternative Modification (or the data that would be provided under it). Where the discussions differ between the Proposed and Alternative Modification, this is highlighted in the text.

3.1 Confirming the Proposed Solution

3.1.1 Modification Group's Discussions

The Group discussed three areas which needed to be confirmed for the proposed solution. These are:

- Whether changes are required to the D0019 file structure and sequencing;
- How NHHDCs will ensure only data for the 'Relevant LDSO' is provided; and
- What validation will be required by LDSOs and how will suspect data be managed.

The Group considered how the new data flow would be formulated. Should it be a process that occurs at the same time as the D0019 is created for the Supplier, or should it be a new flow that is based on the D0019? The LDSOs present within the Group highlighted that, for the Proposed Modification, they do not wish for any changes to be made to the D0019 file structure, or its sequencing. The Group agreed that the proposal is to send the D0019 flow without any changes, to the relevant LDSOs at the same time that it is sent by the NHHDCs to the Suppliers. It was noted that LDSOs would need to build systems to be able to accommodate and process this new data flow in order to obtain the benefits.

The Group noted that the LDSO ID in the MPAN could be used to distinguish the LDSO and ensure that only the relevant LDSO receives the file. However, as there was no NHHDC present at the meeting, the Group requested that, as part of their Impact Assessments, NHHDCs be given the opportunity to identify a more cost effective means to distinguish LDSOs. From the impact assessment responses NHHDCs did not provide any alternative methods for identifying LDSOs that would be more cost effective.

The Group considered validation requirements for data sent to the LDSOs from the NHHDCs, and noted that this could add potentially complex steps and costs to the process without much corresponding benefit. One member believed that the key outcome was to obtain the D0019 information. The validation and associated costs were therefore unnecessary, especially as these costs would contribute to the final assessment of P222, potentially jeopardising it.

Additionally, the Group noted that, because a D0019 goes through validation once received by the NHHDA, the files initially sent to LDSOs (i.e. at the same time as sent to the NHHDA), will potentially contain some data which is inaccurate. A Group member believed that this was acceptable, as the information would still be of sufficient accuracy for use in planning and management of the LDSO distribution system. They also noted that should the file be rejected by the NHHDA, then an updated file would be sent from the NHHDC to the NHHDA. This updated file would have corrected data in it, and, by definition, would also be sent to the relevant LDSOs.

A member questioned whether LDSOs would query the data they receive if they believe there are errors in it. There may be occasions when an LDSO wishes to query data, but that this should be an informal process that relies on the LDSO relationship with the Supplier. There is no need to have a formal obligation on the Suppliers to respond to any queries. The Group agreed that this would be sufficient.

One member of the Group queried whether the LDSOs require the information as often as the NHHDA or Suppliers who need this for Settlement. The Proposer confirmed that it was his view that the main benefit in the proposal lay in obtaining the D0019 information, and not necessarily in the frequency it is obtained. This is because the benefits lie in network planning. In order to improve network planning, regular updates of the D0019 data is not required. Additionally, with the data transferred across the DTN being charged at a rate per megabyte, the Group believed that cost savings could be made by sending the information less frequently and not over the DTN at all. For these reasons, the Group initially agreed that the Alternative Modification would only require the information to be sent quarterly, and then concluded that the information should be sent via CD rather than across the DTN.

3.1.2 Views of Respondents to Assessment Procedure Consultation

The consultation responses contained no specific comments in this area.

3.2 Benefits and Avoided Costs of a Central Systems Solution

3.2.1 Modification Group's Initial Discussions

The Group found it difficult to identify and quantify BSC related benefits for P222.

The Group considered whether any BSC or non-BSC benefits, (or avoided costs), could eventuate from:

- Removing some current processing costs undertaken by LDSOs to obtain site specific information;
- Distribution Use of System charges (via improved network planning);
- A positive impact on accommodating distributed generation;
- A positive impact on identification of theft or metering anomaly identification; and
- The avoided costs of setting up separate bilateral arrangements with each Supplier (which is the only way in which LDSOs can currently obtain D0019 equivalent data).

The Group believed that any benefits that could potentially be identified would be applicable to both the Proposed and Alternative Modifications. However, as the Alternative contained data that had been subject to validation, the better quality data would mean that the degree of benefits under the Alternative Modification would exceed those of the Proposed Modification.

Remove current processing costs

The Group believed that there could be some benefit to LDSOs from using the data from the Proposed or Alternative Modification to replace existing processing to obtain site specific consumption data. The Group asked LDSOs via the industry impact assessment whether they believed that they would be able to reduce any current processing costs under P222.

The results of the impact assessment indicated that a number of LDSOs either do not currently process existing BSC data flows (D0010s) to obtain site specific consumption data or, where they do so, they would intend to continue processing them. Therefore, there would not be any savings until Parties believed that processing the D0010s, or other data to achieve the site specific information, became redundant. One LDSO did indicate that they would stop processing D0010s at a saving of £6,250 in the first year and then £7,250 per annum thereafter.

The Group noted that the responses indicated that the benefits to the LDSOs from reducing existing costs were therefore likely to be very small or negligible. Additionally, any savings made by LDSOs cannot be directly translated into a BSC benefit.

One member suggested that the LDSOs who currently process the D0010 data flow were more likely to use the D0010 to obtain site specific consumption data for Profile Class 5 to 8 sites. The member believed the

benefit of P222 would be to obtain consumption data for Profile Class 1 to 4 sites for network planning purposes. It was noted that the D0010 could not be used to determine site specific consumption data for Profile Class 1 – 4 sites due to the volumes of sites involved. Therefore, the data provided by P222 may be of more use to Independent LDSOs, who may have a higher proportion of Profile Classes 1 to 4 sites. In addition, P222 may be of more benefit to Independent LDSOs as they have less headroom in their networks, therefore more accurate planning is required.

The Group also noted that a number of the respondents to the impact assessment stated that they did not use the D0010 flow. In these cases, the Group was unclear in respect of what data was being used for planning purposes. Therefore a specific question was asked as part of the Assessment Procedure consultation. The responses can be found in Appendix 3.

Potential Benefits for Distribution Use of System charges

The Group considered whether there would be any benefits from more cost reflective Distribution Use of System (DUoS) charges.

At present NHHDCs process meter reading data to determine EACs and AAs for MPANs. Because LDSOs do not receive the site specific EAC or AA information, they have to essentially replicate NHHDC systems if they wish to produce an EAC. Some LDSOs already have processes in place to produce an estimate of consumption. But for those that do not, such duplication would be inefficient. It would mean that a proportion of the costs are incurred twice. Duplicate costs in generating EAC information are potentially recovered from Suppliers through DUoS charges.

More cost reflective charging would result in better targeting of costs and potentially enhance generator competition. The majority of the Group could not identify any direct means from which the information provided could lead to more cost reflective DUoS charges. Additionally, if there were more cost reflective DUoS charges, the link to a BSC benefit via potentially improving generator competition would appear to be a tenuous one.

One member suggested that the data provided under P222 would allow LDSOs who chose to, to obtain site specific information for all Profile Classes. This would enable the LDSOs to determine the quantities that a generator delivers to a GSP Group even if the energy is consumed locally, rather than basing DUoS charges on the net usage across the System. This may assist the development of potentially more cost reflective DUoS charges that gives appropriate incentives on generators, therefore enhancing competition.

The Group noted that the LDSO responses to the impact assessment only indicated that a few LDSOs would be likely to use the information and that there would therefore be less scope for more cost reflective DUoS charges.

Impact on Distributed Generation

The amount of distributed energy has been steadily increasing over time and the growth is expected to continue. One member suggested that the P222 data would allow LDSOs to be able to better understand how to incorporate distributed energy into their networks and therefore improve the planning of their systems. By offering mutually compatible locations, this would facilitate new distributed generation and help to increase competition.

The majority of the Group did not believe that the P222 data would provide these benefits over and above the information already available to the LDSOs.

Impact on theft or metering anomaly identification

One member indicated that the P222 data could be used for theft identification. The member provided the Group with some analysis for theft for the 8 months between May 2007 and December 2007 inclusive. This is included as Attachment 1.

The member indicated that in the 8 months, 163 sites had been identified on their network for which theft had occurred and this was at an average cost of £112 per site. The member suggested that they would expect the data provided under P222 to enable them to detect more theft, although the degree to which this would increase is speculative. If, for example, an increase in detection of 3% occurred, then this would equate to an extra £550 of theft detected per year. The member also noted that detection would be likely to occur on larger thefts and therefore the quantum of theft detected may in fact be larger. This benefit of detecting theft would be that it ensures the volumes submitted in Settlement are appropriately allocated.

The Group did not endorse the theft analysis. The Group did not believe that all LDSOs would necessarily use the P222 data for theft detection. One member did note that it may be able to be used to identify and investigate general metering anomalies more easily. However, most members did not feel that the data provided under P222 would allow for such identification over and above what existing information available to LDSOs would allow for.

The avoided costs of setting up bilateral arrangements

Currently, the only way in which LDSOs can currently obtain D0019 equivalent data is by approaching Suppliers for it, and entering bilateral agreements to regularly provide this information. The Group therefore sought the costs and desire for such a solution from the impact assessment.

The impact assessment responses⁹ indicated that the costs of setting up bilateral arrangements were likely to be either equivalent, or in excess, of those under a BSC or DCUSA change. This is primarily due to the extra administration work involved, and the potential that information would be provided in different formats (and thus increasing processing costs). This could be due to different Suppliers providing the information to an LDSO in different formats, or different Suppliers accommodating different LDSO format requests. The Group did not believe that this would be an efficient means of obtaining the data.

Supplier respondents to the impact assessment also indicated that they would be likely to enter a bilateral arrangement on a case by case basis. One respondent supported entering bi-lateral contracts as they believed that Suppliers should not have to pay for this information given that LDSOs should be able to process the required information from D0010s.

3.2.2 Views of Respondents to Assessment Procedure Consultation and Groups Consideration of these

All Potential Benefits Identified

In relation to the benefits identified in Section 3.2.1, the majority of respondents either:

- Did not believe that the benefits had been proven to actually eventuate;
- Did not believe they justified the cost of the Proposed or Alternative Modifications; and/or
- Believed that the benefits identified were not applicable to the BSC Objectives.

The majority of the Group supported the views of these respondents.

A minority believed that benefits would accrue in regard to one or more of:

- Facilitating new entry of distributed energy and for small scale generation to compete with large scale generation;
- Improve that accuracy of the data being entered into Settlements; and
- Improve the ability for LDSOs to manage their networks (and potentially offer negative DUoS charges).

⁹ See responses to questions 16, 23, and 24 in Attachment 2.

A minority of the Group believed that facilitating distributed energy and improved settlement data accuracy would occur under P222, although noted that these could not be quantified.

One respondent noted that, whilst not rejecting that benefits exist, links made between improved system management, more cost reflective DUoS charging, and improved competition in distributed generation were very tenuous. The respondent believed that the expected lower costs of the Alternative would mean that these tenuous benefits would be likely to outweigh the costs, whereas the Proposed Modification would not.

Another respondent noted that, whilst they did not agree that the benefits would eventuate, the limited amount of LDSOs indicating they would use the information, eroded any benefits that had been suggested. Another respondent believed that in regard to the Alternative Modification, where LDSOs would have to opt in, the benefits suggested would be eroded even further.

A Group member supported the view that, by its nature of requiring LDSOs to 'opt in', the Alternative would be likely to erode any benefits of the Proposed (although the member did not believe there were any benefits from the Proposed Modification).

The Group acknowledged that the Impact Assessments had not provided any meaningful quantified benefits. The Group did not believe there was any analysis that could be done to realistically quantify the BSC benefits. The only way to obtain quantified benefits would be to provide LDSOs with the EAC data, and measure the resulting activities.

Any Additional BSC Benefits Identified during Consultation?

One respondent noted that accurate site specific consumption data (as provided under P222), could potentially facilitate improved loss adjustment factors.

The Group did not believe that the information provided under either the Proposed or Alternative Modifications would allow for any more accurate loss adjustment factors over and above existing information available (for example D0010's) to derive these. One member noted that this is based on the assumption that LDSOs actually use the D0010s to derive the loss adjustment factors.

3.3 Benefits of Proposed Solution data flow (D0019) compared with existing data available to LDSOs

3.3.1 Modification Group's Discussions

The D0019 would provide LDSOs with site specific consumption data. It is possible for LDSOs to obtain site specific consumption data by relying on existing BSC data flows sent to the LDSO.

Under existing BSC requirements, LDSOs should currently receive data flows containing meter technical details from NHHMOAs (D0149/D0150) and meter readings from NHHDCs (D0010).

It was queried why the D0019 would be better than the D0010 given that the D0010 contains actual meter readings which, by definition, should make it the more accurate item of data for the date of the reading and would be used in creating the D0019.

One LDSO member indicated that the D0010s need to be processed in order to be of any value. This is due to the amount of missing data¹⁰ and the degree to which it can be out of date (i.e. containing data in which some meters have not been read for up to 14 months). By processing information in these flows, an LDSO can calculate site specific consumption data, however; it is the processing of this information that has proven costly. The member noted that processing the D0010s means the LDSO is ultimately replicating an activity that is undertaken by the NHHDCs.

¹⁰ Specifically, for new sites, where corrections have been made, or the degree to which meter reads cannot be loaded into LDSO systems due to an inconsistency with the D0149 or D0150 information.

The impact assessment responses indicated that at least 5 LDSOs currently use the D0010s to calculate site specific data. The majority of LDSO respondents indicated they were happy with the accuracy of the information that they currently receive for the purposes of network planning. One LDSO has estimated that the cost of processing the D0010 data is approximately £10,000 per year. However, the LDSO estimates that due to errors such as missing and inconsistent data flows, such calculations are only 90% accurate. It is estimated that introducing processes to query and resolve such errors could cost the LDSO around £100,000 per year. This would include staff required to query and resolve the issues. Additionally, should such processes be introduced, the LDSO estimates that Suppliers and/or their Agents, would receive around 5,000 queries per year.

One member also noted that NHHDCs are responsible for converting information from D0010s into consumption data for Settlement. LDSOs each individually processing the D0010s would effectively be replicating what the NHHDCs do. This would be inefficient, especially when the NHHDCs already have the site specific information available.

The Group noted that, if D0010s are missing, then this is a compliance issue and by rectifying the non-compliances, the issue could be resolved and the D0010s used.

3.3.2 Views of Respondents to Assessment Procedure Consultation and Modification Group's Consideration of these

Some respondents did not believe the information that would be provided under P222 would be of any value over and above the BSC information already available to LDSOs (e.g. D0010 combined with D0149s and D0150 flows).

It was also noted by a number of respondents that some LDSOs prefer to use the existing information and would not seek to use the information provided under P222 at all.

Additionally, there were a number of respondents who believed that the most pragmatic approach should be for those LDSOs who want this information to enter into commercial arrangements with Suppliers for this information. LDSOs could do this currently, and would have to make a commercial decision as to the value of the information prior to doing so.

A minority of respondents indicated that the D0019 data would be more accurate than existing data, and that it would be more efficient to receive an EAC than attempting to derive it themselves. One respondent indicated that the cost and complexity of processing D0010's would result in LDSOs effectively duplicating the NHHDC system to derive the D0019 values. Again, this would be inefficient.

The majority of the Group agreed that the information provided under P222 would not provide any additional benefit to that currently available. However, they also acknowledged that there might be some difference between different types of LDSOs. An Independent LDSO might not have the systems in place that incumbents do to process existing information. One member pointed out that incumbent LDSOs who derive their own EAC values might be happy with existing processes. However, it is inefficient for an Independent, or potential new (distributor) entrant, to have to set up these processes to replicate what the NHHDC already do.

Some members of the Group reiterated the issues with the approach of entering bi-lateral arrangements with multiple Suppliers. For example, this would require approaching a number of different Suppliers, and potentially getting the information in different formats. This was not considered efficient.

3.4 MRA and Data Transfer Network/Catalogue

3.4.1 Modification Group's Discussions

The Proposed Modification has an impact on the MRA via the impact on the DTN/DTC. The DTC change can only be implemented under the MRA change process. The MRA changes would need to be progressed prior to implementation of P222.

The impact on the MRA is that the DTC would need to be revised in line with P222 requirements of the Proposed Modification. The costs of this would include:

- The costs to Parties to implement the changes in their systems (which are included in their impact responses – Attachment 2);
- The costs for the DTN to be revised and amended (see Electralink costs for the Proposed Modification in section 3.4.1), which are paid by the DTN Users; and
- The costs of administering the MRA change process (these are already covered under the MRASCo budget process).

Changes to the DTN and DTC would be required to indicate that the LDSO would be an additional recipient of the D0019 flow, and to reconfigure the network gateways to allow the D0019 to be passed from NHHDCs to LDSOs.

It was estimated that this would require an additional 13.9 gigabytes of traffic across the DTN. Based on 2007 data volumes, this would result in an increase in Data Transfer Systems Traffic Usage Charges of £25,020 per annum (at today's DTS prices). No performance issues have been identified. The Impact Assessment from Electralink can be found in Attachment 3.

For the Alternative Modification, the information would be supplied to LDSOs by the NHHDCs on a CD. Therefore, there would be no DTN costs.

3.4.2 Views of Respondents to Assessment Procedure Consultation

The consultation responses contained no specific comments in this area.

3.5 Changes Since P043

3.5.1 Modification Group's Initial Discussions

The Group noted that the main change since P043 was rejected in 2001 has been the emergence of Independent LDSOs. Additionally, when P043 was raised, only a limited amount of LDSOs had undergone business separation. Therefore, there was less support for and benefits identifiable under P043 as other LDSOs still had access to the required data.

However, the Group noted that the degree of change has not resulted in a comprehensive desire across the industry for LDSO's to receive EAC and AA data, illustrated by the lack of unanimous support from LDSOs.

One member noted that, given less LDSOs now have access to this data (as compared to 2001), greater granularity of consumption data is required for dynamic management of the Distribution System. Additionally, there has been an increase in the amount of distributed energy. New distributed energy could potentially benefit from more cost reflective DUoS charges if LDSOs were able to better plan their network and offer better rates at mutually beneficial locations.

3.5.2 Views of Respondents to Assessment Procedure Consultation and Modification Groups Consideration of these

One respondent noted that it was highlighted during the discussions of P043 that LDSOs could enter a commercial arrangement with Suppliers to get the D0019 data. Yet, despite P043 being rejected, it was not aware of any such arrangements being entered into. The respondent did not agree that business separation had changed since P43 was rejected, as this was already in place by 2001, some time before P043 was raised.

The Group noted that some business separation had occurred prior to P43 being raised, and additionally, that it was not aware of any commercial arrangements in which LDSOs obtained D0019 information from Suppliers.

The Group confirmed that the emergence of Independent LDSOs, who might not necessarily have the processes in place that the incumbent LDSOs do to process existing BSC information (e.g. D0010's), is an area in which the current situation differs from when P043 was raised.

3.6 Non-BSC solution – DCUSA change

3.6.1 Modification Group's Discussions

The Group investigated whether a non-BSC solution could provide equivalent information to the LDSOs to that which would be provided under the Proposed or Alternative Modifications¹¹.

Such a non-BSC solution would seek to provide LDSOs with D0019-equivalent data by modifying the provisions in the DCUSA to place the required obligations onto the Suppliers.

This solution would seek to update the DCUSA to provide provisions for the LDSO to obtain the required site specific consumption data from Suppliers. The Modification Group noted that the DCUSA could be changed to facilitate this solution, but agreed that the detailed requirements of such a change would be subject to the DCUSA change process.

As cost information for DCUSA changes is considered commercially sensitive, the Group could not obtain average costs for progressing a DCUSA change. The Group agreed to use the average cost of a BSC modification to act as an estimate for this. ELEXON has estimated this cost at c.£30,000¹²

As part of the industry impact assessment (see responses in Attachment 2), the Group obtained costs for the solution as follows:

- **LDSOs:** Substantial administration effort was expected to collate the information from multiple Suppliers. One Party expressed that these costs would be £2,000 over and above the Proposed Modification or Alternative Modification. The time required to implement was generally in the range of 6 to 9 months with one LDSO suggesting 18 months; and

¹¹ Note that, as part of a BSC Modification, it is not usual practice to seek to establish costs relating to non-BSC solutions (Solutions 3, 4a, and 4b). However, due the particular circumstances relating to this Proposed Modification, the BSC Panel has instructed the Group, where possible, to try and establish these costs. The BSC Panel is of the opinion that when the Modification comes before them for a recommendation, this information will assist them to satisfy themselves that a BSC solution is one that is the least cost to the industry. The particular circumstances driving this non-standard approach largely relate to the rejection of Modification P043 'Provision of Annualised Advance (AA) and Estimated Annual Consumption (EAC) Data', which is identical to the Proposed Modification, and the comments made by Ofgem as part of its P043 decision. Ofgem, within its Decision letter, noted; that there were alternative routes outside of the BSC to resolve the issue and stated that in their view the proposal "best resides outside the BSC"; that the proposal may lead to additional overall costs and it was questionable whether the changes required under the proposal warranted the expense that would be incurred under changes to the BSC. In short, there was an indication that there may be other non-BSC solutions that could be at lower cost to the industry.

It is important to clarify that the remit of the Modification Group remains an assessment of the BSC solutions against the Applicable BSC Objectives, in particular, whether the BSC solutions better facilitate the BSC Objectives, however any cost information obtained will help inform the Panel and the Authority.

¹² This is the average for progressing BSC Modifications raised since 1 November 2004 (Modifications P180 to P220). It does not include implementation costs for approved modifications.

- **Suppliers:** Costs provided range from £20,000 to £45,000 although some Suppliers indicated that it would be difficult to provide accurate estimates;

One member noted that the core processing costs for a DCUSA change are likely to be the same for Parties as the Proposed Modification. This is because it is the same systems that would be required to be changed. So the DCUSA change would therefore have the additional cost over a BSC solution of having to run through the DCUSA change process. Additional administration costs would also be incurred if the DCUSA change allows for Suppliers to supply the data, or LDSOs to request the data, in a non-consistent format.

3.6.2 Views of Respondents to Assessment Procedure Consultation

The consultation responses contained no specific comments in this area.

3.7 Cost Recovery

3.7.1 Modification Group's Discussions

The Group discussed the possibility that the Supplier and Central Systems costs attributable to the Proposed or Alternative Modification could be targeted at the LDSOs, as they are likely to obtain the benefits of the Modification.

The Group noted that under Modification P216 'Audit of LLF Production', benefits were identified for Suppliers with the cost burden being on LDSOs. Additionally, it was noted that the Proposed and Alternative Modifications need to be assessed against the Applicable BSC Objectives, and if net benefits to Parties are identified as part of this process, then arguably, costs are appropriately targeted.

The Group does not propose any variation for cost recovery from the normal recovery of central costs.

3.7.2 Views of Respondents to Assessment Procedure Consultation

The consultation responses contained no specific comments in this area.

3.8 Implementation Approach and Costs

3.8.1 Modification Group's Initial Discussions

There was a range of responses from Party and Party Agent's in respect of the time required to implement the Proposed Modification or Alternative Modification. These are, in almost all instances, in excess of Central Systems and BSSCo implementation requirements. The most common responses fell in the range of 6-9 months for both the Proposed and Alternative Modification. Therefore an initial implementation approach was based on an Implementation Date 9 months following an Authority decision.

3.8.2 Proposed Modification Costs – ELEXON and Central Service Providers

PROPOSED MODIFICATION IMPLEMENTATION COSTS¹³

		Stand Alone Cost	Tolerance
Total Demand Led Implementation Cost		£0	n/a

¹³ An explanation of the cost terms used in this section can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

ELEXON Implementation Resource Cost		17 man days £3,740	+/- 10%
Total Implementation Cost		£3,740	+/- 10%

The results of the industry impact assessment can be found in Appendix 4.

3.8.3 Alternative Modification Costs - ELEXON and Central Service Providers

ALTERNATIVE MODIFICATION IMPLEMENTATION COSTS¹⁴

		Stand Alone Cost	Tolerance
Service Provider¹⁵ Cost	Change Specific Cost	£67,000 (12 weeks)	+/- 0%
	Release Cost	£0	+/- 0%
	Incremental Release Cost	£0	+/- 0%
	Total Service Provider Cost	£67,000	+/- 0%
Implementation Cost	External Audit	£0	+/- 0%
	Design Clarifications	£3,350	+/- 0%
	Additional Resource Costs	£0	+/- 0%
	Additional Testing and Audit Support Costs	£0	+/- 0%
Total Demand Led Implementation Cost		£70,350	+/- 0%

ELEXON Implementation Resource Cost		111 man days £24,420	+/- 10%
Total Implementation Cost		£94,770	+/- 5%

¹⁴ An explanation of the cost terms used in this section can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

¹⁵ BSC Agent and non-BSC Agent Service Provider and software costs.

The detailed results of the industry impact assessment can be found in Appendix 4.

3.8.3 Views of Respondents to Assessment Procedure Consultation

Four respondents disagreed with the Implementation Approach. Of these, three respondents disagreed because they did not support P222, not that they would not be able to update their systems.

The final respondent who disagreed with the Implementation Approach suggested a timescale of 12 months was required, however there was no qualification of why a year was necessary.

3.8.4 Modification Group's Conclusions

The Group noted that there was no evidence as to why the respondent would take 12 months to implement the solution. Further, the same respondent indicated that they would not in fact use the information. The Group asked that ELEXON contact the respondent for further detail.

In doing so, it was clarified that the respondent had disagreed with the Implementation Approach (and provided a timescale of 12 months) to take into account the perceived need to replace their existing processes (processing D0010s with D0149 and D0150) with the new data. The respondent agreed that if they only had to 'dump' the data as it was sent to them, then the suggested 9 month implementation timescale was achievable.

Therefore, the Modification Group agreed that the Implementation Date for both the Proposed Modification and Alternative Modification should be:

- 25 June 2009 if an Authority decision is received on or before 19 September 2008; or
- 5 November 2009 if an Authority decision is received after 19 September 2008 but on or before 20 February 2009.

As part of Implementation for the Alternative Modification, LDSOs should be informed by ELEXON who the relevant NHHDA's are. This is to enable LDSOs to be able to notify both Suppliers and NHHDA's that they wish to 'opt in' to receive the new data flow.

The implementation would require updates to BSCPs as indicated in Appendix 4. These would need to be updated to include the detail of how the obligations put on Parties under Section S of the BSC would be carried out.

3.9 Legal Text

The Modification Group has reviewed the text for the Proposed Modification and Alternative Modification and agreed that it delivers the solution developed by the Group.

A copy of the draft legal text can be found in Appendix 1.

4 ASSESSMENT OF MODIFICATION AGAINST APPLICABLE BSC OBJECTIVES

This section outlines the views of consultation respondents and the Modification Group regarding the merits of P222 against the Applicable BSC Objectives.

4.1 Proposed Modification

4.1.1 Modification Group's Initial Discussions

The initial **MAJORITY** view of the Modification Group was that the Proposed Modification **WOULD NOT** better facilitate the achievement of Applicable BSC Objectives when compared to the current Code baseline. This is because the majority did not initially believe that any arguments in favour of the Proposed

Modification could be made. Correspondingly, the majority did not initially provide any arguments to suggest the Applicable BSC Objectives would be detrimentally impacted. However, the view of the majority was that the cost of the Proposed Modification could not be justified when there were no BSC benefits that could be identified.

There was an initial **MINORITY** view that the Proposed Modification would better facilitate the achievement of Applicable BSC Objective (c). This is for the following reasons:

- P222 would provide for increased ability for new distributed generation to enter the market, and for small scale generation to compete with larger scale generation. The D0019 information would allow LDSOs to determine the quantities that a generator delivers locally to be netted off against local demand (e.g. as in a regional power zone). This would allow for more cost reflective Distribution Use of System charges which would provide the correct incentives on generators, therefore enhancing competition; and
- Improved granularity of information that LDSOs have access to will improve the data that ultimately enters Settlement as LDSOs may be able to highlight issues causing erroneous data. Improving the accuracy of data in Settlement benefits all Parties by creating fairer arrangements which, in turn, promote competition.

4.1.2 Views of Respondents to Assessment Procedure Consultation

The **MAJORITY** view of respondents to the Assessment Procedure consultation was that the Proposed Modification **WOULD NOT** better facilitate the achievement of Applicable BSC Objectives.

The majority could not provide any arguments that the Applicable BSC Objectives were detrimentally impacted. However, the following arguments were expressed by respondents in support of the view that the Proposed Modification would not better facilitate:

- BSC benefits have not been identified, and there is no evidence to support the minority view of the Group. Therefore the costs for implementation would outweigh the benefits;
- No BSC benefits have been identified, although P222 would assist LDSOs to discharge their statutory duties;
- Whilst not suggesting that benefits would accrue, if they did, the expected limited uptake from LDSOs to use the information would erode the benefits.

A minority provided the following arguments that the Proposed Modification would be detrimental to Applicable BSC Objective (c):

- The increased and ongoing costs on Suppliers as well as the increased contractual risk from having to manage a new obligation would inhibit competition in the generation and supply of electricity.

A minority provided the following arguments that the Proposed Modification would be detrimental to Applicable BSC Objective (d):

- An increase in the administrative costs of operating the BSC are more likely than a reduction.

There was a **MINORITY** view that the Proposed Modification would better facilitate the achievement of Applicable BSC Objective (c). This is for the following reasons:

- The Proposed Modification provides for increased ability for new distributed/embedded generation to enter the market, and for small scale generation to compete with larger scale generation. The D0019 information would allow LDSOs to determine the quantities that a generator delivers locally to be netted off against local demand (e.g. as in a regional power zone). This would allow for more cost reflective Distribution Use of System charges which would provide the correct incentives on generators, therefore enhancing competition; and

- Improved granularity of information that LDSOs have access to will improve the data that ultimately enters Settlement as LDSOs may be able to highlight issues causing erroneous data. Improving the accuracy of data in Settlement benefits all Parties by creating fairer arrangements which, in turn, promote competition.

Additionally, there was a **MINORITY** view that the Proposed Modification would better facilitate the achievement of Applicable BSC Objective (d) as the cost and complexity of processing D0010's means that LDSOs would effectively duplicating the NHHDC systems. This would not be efficient or cost effective.

Other arguments were also given in regard to improved network planning and reduction in the requirement for boundary metering.

4.1.3 Modification Group's Final Assessment

The **MAJORITY** view of the Modification Group was that the Proposed Modification **WOULD NOT** better facilitate the achievement of Applicable BSC Objectives when compared to the current Code baseline, for the following reasons:

- Benefits had not been proven to exist (and the Group did not believe that there was a piece of analysis that could be done to meaningfully quantify the benefits); and
- The use of the information by only some LDSOs would erode benefits.

Some members of the majority of the Group believed that there were only some tenuous arguments against the Applicable BSC Objectives which include:

- The ongoing costs associated with the Proposed Modification, and the contractual risk of new obligations would be detrimental to competition (Objective (c)) as higher costs for Suppliers would be more likely to deter new entrants to the Supply market.

The **MINORITY** view of the Group was that the Proposed Modification **WOULD** better facilitate the achievement of Applicable BSC Objectives when compared to the current Code baseline, for the same reasons as given by the consultation responses.

The Group agreed that the Proposed Modification would have a neutral impact on Applicable BSC Objectives (a) and (b).

4.2 Alternative Modification

4.2.1 Modification Group's Initial Discussions

The initial **UNANIMOUS** view of the Modification Group was that the Alternative Modification **WOULD** be preferable than **the Proposed Modification**, for the primary reason that the costs to the industry as a whole would be lower (despite central costs being higher).

The **MAJORITY** of the Group could not **initially** justify that the Alternative better facilitated the Applicable BSC Objectives compared to the Proposed Modification as they still could not form any arguments for which the Alternative Modification better facilitated the Applicable BSC objectives at all. The reason for the majority's preference for the Alternative was related to the expectation of lower overall industry costs.

A **MINORITY** of the Group believed that the Alternative Modification would better facilitate the Applicable BSC Objectives (c) and (d) when compared to the Proposed Modification. This is due to the lower overall industry costs of the Alternative Modification improving the efficiency in the implementation and administration of the BSC. Additionally, the data provided under the Alternative is more relevant to the LDSO requirements and therefore the benefits under competition identified by the minority for the Proposed Modification would be amplified.

The initial **MAJORITY** view of the Group was that the Alternative **WOULD NOT** be better than the current baseline for the same reasons as for the Proposed Modification.

The initial **MINORITY** view of the Group was that the Alternative Modification **WOULD** better facilitate the achievement of Applicable BSC Objectives (c) when compared to the current Code baseline, for the same reasons as for the Proposed Modification.

4.2.2 Views of Respondents to Assessment Procedure Consultation

All but one respondent's views of the Alternative Modification were the same as those given for the Proposed Modification.

One respondent supported the Alternative Modification where they did not support the Proposed. This was due to the respondents view that lower overall industry costs of the Alternative Modification would result in the tenuous benefits of P222 being likely to outweigh the costs.

The **MAJORITY** view of respondents to the Assessment Procedure consultation was that the Alternative Modification **WOULD NOT** better facilitate the achievement of Applicable BSC Objectives for the same reasons as given for the Proposed Modification.

The initial **MINORITY** view of respondents was that the Alternative Modification **WOULD** better facilitate the achievement of Applicable BSC Objectives (c) and (d) when compared to the current Code baseline, for the same reasons as for the Proposed Modification.

4.2.3 Modification Group's Conclusions

After considering the consultation responses the Modification Group was **SPLIT** as to whether the Alternative Modification would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification. The members voted as follows:

Member ¹⁶	Proposed vs Baseline	Alternative vs Baseline	Alternative vs Proposed
Member 1	N	N	N
Member 2	N	N	N
Member 3	N	N	N
Member 4	N	N	N
Member 5	N	N	Y
Member 6	N	N	Y
Member 7	N	N	Y
Member 8	Y	Y	Y

Members who believed the Alternative was better than the Proposed did so for one or more of the following reasons:

- The expected lower cost to the industry as a whole would result in a more efficient solution. This is because there is no need to put automated systems in place and the information can be more easily processed without the need for large systems. Better industry efficiency is beneficial to competition;

¹⁶ Note that the order of the members here **does not** correspond to the table in Appendix 2.

- The ability to 'opt in' and the quarterly sending of the data would result in lower data flows than the Proposed and therefore have efficiency gains. Again, better industry efficiency is beneficial to competition; and/or
- The new data flow under the Alternative Modification contains validated data so it would be more valuable and more likely to achieve the benefits identified by the minority of the Group.

Members who believed the Alternative was not better than the Proposed did so for one or more of the following reasons:

- The ability to 'opt in' and the quarterly sending of the data would result in any BSC benefits that are attributable to P222 being eroded; and/or
- If no arguments can be made against the BSC Objectives in support of the Alternative Modification, then even if this is same for the Proposed Modification, it is not possible to say that the Alternative better facilitates the Applicable BSC Objectives than the Proposed Modification.

The Group agreed that the Alternative Modification would have a neutral impact on Applicable BSC Objectives (a) and (b).

4.3 Final Recommendation to the Panel

On the basis of the above assessment, the Modification Group therefore agreed a **MAJORITY** recommendation to the Panel that:

- The Proposed Modification **SHOULD NOT** be made; and that
- The Alternative Modification **SHOULD NOT** be made.

Details of the Group's recommended Implementation Date and legal text can be found in Section 3.

5 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

Acronym/Term	Definition
AA	Annualised Advance
D0010	Meter Readings – this flow contains raw Meter reading data and is used in the creation of a D0019.
D0019	Metering System EAC/AA Data – information in this flow is derived using data from current and previous Meter reads (D0010) and the profiles over the read period to create an annual consumption for a metering point. The D0019 is then passed into the Non Half Hourly Data Aggregator.
D0030	Non Half Hourly DUoS Report – this flow contains the total profiled consumption for all Metering Systems (but not per Metering Systems) for a particular LDSO.
D0036	Validated Half hourly Advances for inclusion in Aggregated Supplier Matrix
D0041	Supplier Purchase Matrix Data – this flow contains details of NHH Consumption per Supplier aggregated per GSP Group by profile class, line loss factor class and measurement requirement.
D0149	Notification of Mapping Details. This flow notifies mapping of physical registers to time pattern regimes.

D0150	Non Half-hourly Meter Technical Details
D0268	Half Hourly Meter Technical Details
D0275	Validated Half Hourly Advances
DCUSA	Distribution Connection and Use of System Agreement
LDSO	Licensed Distribution System Operator
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
EAC	Estimated Annual Consumption
IDNO	Independent Distribution Network Operator
MPAN	Meter Point Administration Number – An MPAN is a unique number for each meter.
MRASCO	Master Registration Agreement Service Company
NHH	Non Half Hourly
NHHDA	Non Half-Hourly Data Aggregator

6 DOCUMENT CONTROL

6.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	22/04/08	Chris Stewart	Sarah Jones	For technical review
0.2	23/04/08	Chris Stewart	David Jones	For peer review
0.3	24/04/08	Chris Stewart		For Modification Group review
0.4	29/04/08	Chris Stewart	David Jones	For quality review
1.0	dd/mm/yy	Change Delivery		For Panel decision

6.2 References

Ref.	Document Title	Owner	Issue Date	Version
1	Data Transfer Catalogue – MRASCO website Data Flows	MRASCO		8.8
2	DCUSA – 5 October 2006 http://www.ofgem.gov.uk/Licensing/ElecCodes/DCUSA/PreDesig/Documents1/15650-DCUSA.pdf	Ofgem		1.0
3	P043 'Provision of Annualised Advance and Estimated Annual Consumption Data' – Modification documents including decision letter ELEXON - Modification Proposal P043	ELEXON / Ofgem	17/01/02	

APPENDIX 1: DRAFT LEGAL TEXT

Draft legal text for the Proposed Modification is attached as a separate document, Attachment 4.

Draft legal text for the Alternative Modification is attached as a separate document, Attachment 5.

APPENDIX 2: PROCESS FOLLOWED

Copies of all documents referred to in the table below can be found on the BSC Website at: [ELEXON - Modification Proposal P222](#)

Date	Event
01/02/08	Modification Proposal raised by The Electricity Network Company Limited
14/02/08	IWA presented to the Panel
21/02/08	First Assessment Procedure Modification Group meeting held
10/03/08	Second Assessment Procedure Modification Group meeting held
12/03/08	Requirements Specification issued for BSC Agent impact assessment
12/03/08	Request for Party/Party Agent impact assessments request issued
12/03/08	Request for Transmission Company analysis issued
12/03/08	Request for BSCCo impact assessment issued
27/03/08	BSC Agent impact assessment response returned
27/03/08	Party/Party Agent impact assessment responses returned
26/03/08	Transmission Company analysis returned
27/03/08	BSCCo impact assessment returned
31/03/08	Third Assessment Procedure Modification Group meeting held
03/04/08	Consultation Document published
17/04/08	Consultation responses received
21/04/08	Fourth Assessment Procedure Modification Group meeting
8/05/08	Assessment Report presented to the Panel

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL¹⁷

Meeting Cost	£1,500
Legal/Expert Cost	£5,000
Impact Assessment Cost	£5,000
ELEXON Resource	63 man days £17,000

The Impact Assessment Cost has increased from £0 to £5,000 as the Alternative Modification requires an impact assessment from the NHHDA software provider.

MODIFICATION GROUP MEMBERSHIP

Member	Organisation	21/02/08	04/03/08	31/03/08	21/04/08
David Jones	ELEXON (Chair)	✓	✓	✓	✓
Chris Stewart	ELEXON (Lead Analyst)	✓	✓	✓	✓
Mike Harding	The Electricity Network Company Ltd (Proposer's Representative)	✓	✓	✓	✓
Graham Smith	Western Power Distribution	✓	✓		✓
Glenn Sheern	E.ON	✓	✓	✓	✓
Andrew Manning	Npower	✓	✓	✓	✓
James Evans	British Energy	✓	✓		✓
Jane Griffith	Central Networks	✓	✓		✓
James Nixon	SAIC	✓	✓	✓	✓
Mo Sukumaran	Scottish and Southern Energy		✓	✓	✓

Attendee	Organisation	21/02/08	04/03/08	31/03/08	21/04/08
Sarah Jones	ELEXON (Technical Support)			✓	✓
Kevin Spencer	ELEXON (Technical Support)	✓	✓	✓	
Simon Polley	Ofgem	✓	✓	✓	
John Lucas	ELEXON (Technical Support)	✓	✓		
Claire Hemmens	Scottish and Southern Energy	✓			
Howard Gregory	Npower	✓	✓		
Jacqueline McGuire	SAIC	✓			✓

¹⁷ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

Alistair Barnsley	E.on Energy Services	✓ (part)			
Sam Pearson	E.on Energy Services	✓ (part)			
Sarah Mann	ELEXON (Legal)		✓	✓	✓
Jill Ashby	Gemserv		✓		

MODIFICATION GROUP TERMS OF REFERENCE

Modification Proposal P222 will be considered by the P222 Modification Group (which will be formed from the Volume Allocation Standing Modification Group supplemented by members with expertise in Distribution), in accordance with the VASMG's Terms of Reference and this Appendix.

P222 – Provision of EAC and AA data to Distributors

ASSESSMENT PROCEDURE

The Modification Group will carry out an Assessment Procedure in respect of Modification Proposal P222 in accordance with Section F2.6 of the Code.

The Modification Group will produce an Assessment Report for consideration at the BSC Panel Meeting on 8 May 2008.

The Modification Group shall build upon the work of the Issue 31 Group and consider and/or include in the Assessment Report as appropriate:

- Confirm the Proposed solution considering:
 - How NHHDCs will ensure only data for the 'Relevant DSO' is provided;
 - What validation will be required by DSOs and how will suspect data be managed; and
 - Confirm whether changes are required to the D0019 file structure and sequencing;
- The perceived benefits of P222 to types of participant and whether these better meet the Applicable BSC Objectives. Where possible, this should include:
 - Quantification of the benefits suggested to distributed energy and DUoS charges; and
 - The avoided costs attributable to having a Central solution (e.g. Supplier savings from reduction in ad hoc information requests from Distributors);
- The benefits associated with Distributors obtaining data from the D0019 as compared to current data flows available to DSOs;
- The system impacts and estimated costs of changes to DSO and NHHDC systems (and costs to other Parties);
- The associated changes to the MRA and Data Transfer Network/Catalogue;
- Establish what has changed since P043 and whether the P043 Authority comments still have merit;
- Identify any alternative solutions (which may include non-BSC solutions), and provide the estimated costs of these solutions; and

- Establish whether there is any ability to recover the cost of the change from Distributors.

APPENDIX 3: RESULTS OF ASSESSMENT PROCEDURE CONSULTATION

16 responses were received to the P222 Assessment Procedure consultation. 9 of these represented Distributors, 6 represented Suppliers, and 6 represented Party Agents. The Group noted that some Distributors indicated they did not wish to use the data that would be provided under P222 in their Party Impact Assessments. However it seemed that Independent Distributors would. ELEXON therefore agreed to contact other Independent LDSOs to ensure they were aware of this Assessment consultation, given it was identified that these Party types might find the P222 information beneficial.

A summary of the consultation responses is provided in the table below.

Q	Consultation question	Yes	No	Neutral
1.	Do you believe Proposed Modification P222 would better facilitate the achievement of the Applicable BSC Objectives?	5	11	-
2.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline?	6	10	-
3.	Do you believe Alternative Modification P222 would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification?	6	10	-
4.	Do you support the implementation approach described in the consultation document (including the interaction with existing change proposals – See Section 3.8 of the Consultation Document)?	11	1	4
5.	Do you believe there are any alternative BSC solutions that the Modification Group has not identified and that should be considered?	2	14	-
6.	For the Alternative Modification, do you support the data being supplied on a password protected compact disk?	11	5	-
7.	Can you identify and describe any BSC related benefits that have not been identified by the Modification Group?	1	15	-
8.	LDSOs (9 LDSO respondents) Would you use the D0019 information provided by the Proposed Modification, or the new data flow information provided under the Alternative?	6	3	-
9.	LDSOs (9 LDSO respondents) What data do you use to plan and manage your networks? What data do you use for DUoS billing purposes?	-	-	-
10.	Does P222 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Are there any further comments on P222 that you wish to make??	9	7	-

Details of the arguments made by respondents can be found in Sections 3 and 4, along with the Modification Group's consideration of these arguments. Responses to questions not captured in those sections are captured below. Full copies of the consultation responses are attached as a separate document, Attachment 6.

Question 6. Support for the data being supplied on a password protected compact disk

5 respondents did not support the new data flow under the Alternative Modification being sent on a compact disk. This was primarily a concern about lost or corrupt disks and data protection. One respondent preferred the information to be sent via an electronic data flow.

The Group noted that there are already data flows that are sent via compact disk under the BSC. Thus any concern about data protection is one on a higher level than just this Modification. The Group also noted that there was no personal data that would be included on the disk, and it would not be an easy task to be able to deduce any personal information or obtain any benefit from it. The disks would be password protected and thus this would also help to protect the information.

Question 8. Would LDSOs use the D0019 information or the new data flow?

6 LDSOs indicated that they would use this information and 3 indicated that they would not.

Of those that would use it, this was primarily to improve network planning and operation, potentially replace the existing EAC derivation process they use, and to assist in building generation tariffs.

Those who indicated they would not use it believed that existing processes and information are sufficient for their planning purposes.

Question 9. What data do LDSOs use to plan their networks? And what data is used for Distribution Use of System billing purposes?

These two questions were asked by the Group in the consultation because the responses to the impact assessment indicated that some LDSOs did not use D0010s for network planning.

To plan their networks LDSOs indicated that one of, or a combination of the following was used:

- D0010;
- Profiles and consumption data;
- After Diversity Maximum Demand calculations linked to property types;
- A variety of sources including power system tools (e.g. ENMAC) to collect live load data from the distribution network; and/or
- Boundary metering data.

The Group noted that this was a mixed response. Because of the differences in the nature of Independent LDSO businesses, and potentially not having legacy processes in place, Independent LDSOs were likely to use different methods to plan their networks.

For the purposes of DUoS billing, LDSOs indicated they used at least one of the following:

- D0030 and D0036 flows;
- D0010s, D0149, and D0150 for non-half hourly market and D0275 and D268 for the half hourly market; and/or
- D0030 and the D0275.

Question 10. Any other issues or further comments?

One respondent noted that the emergence of Independent LDSOs has been a large change to the industry and that effective solutions are required to identify energy flows across LDSO boundaries. The cost of boundary metering is ultimately borne by suppliers and customers. The respondent acknowledged that the issue of boundary metering may not be relevant to the BSC Objectives. However, if BSC information can replace the need for boundary metering, then this is a saving for the industry.

Another respondent indicated that it believed boundary metering is anti-competitive.

The Group agreed that boundary metering considerations were outside the scope of P222. One member noted that given LDSOs are subject to price control by Ofgem that it was not necessarily the case that their costs would be passed on to consumers.

One Party Agent respondent expressed that the burden of responsibility would be moved to NHHDCor NHHDA to provide the data with no means for recovery.

The Group believed that the ability for Party Agents to recover their costs would depend on their contracts with Suppliers. At the least, Party Agents could factor such costs when they renegotiate expiring contracts. The Group also noted that this is no different from any other change that Party Agents would have to make and their ability to recover costs.

One respondent highlighted that the argument that LDSOs obtaining EAC data would lead to an increase in micro-generation (embedded generation) stretched credulity. This is because there are only about 30 micro-generation sites actually registered in Settlements (out of several thousand that exist). Therefore, the respondent believed that it was a weak argument that LDSOs would be able to identify these sites and offer more cost reflective DUoS charges.

The Group agreed that the low level of micro-generation sites in Settlements does make it difficult to establish any clear benefit in this area. One member noted that Ofgem is looking for ways in which to promote micro-generation in Settlements. Given there is only about 30 sites registered in Settlements then the question of how to provide incentive for this to occur needs to be addressed in some forum.

A number of respondents re-iterated they did not support P222 and that they believed that if LDSOs want this information, then there are other means outside the BSC to obtain it.

APPENDIX 4: RESULTS OF IMPACT ASSESSMENT

During the Assessment Procedure an impact assessment was undertaken in respect of all BSC systems, processes, documentation and parties. The following have been identified as impacted by P222.

a) Impact on BSC Systems and Processes

The Proposed Modification has no impact on the BSC systems or processes.

The Alternative Modification requires NHHDA to send the new flow to LDSOs on a quarterly basis. The NHHDA software will therefore need to be updated. This would be at a cost of £67,000. The NHHDA database contains all the data that is required to be sent to the LDSO in the new flow. However the database structure is designed for optimal performance of the NHHDA Aggregation Run; it is not designed for easy data reporting. Thus production of the new flow will be a major new NHHDA process.

The first stage of a new report process would extract the EAC data for all the Metering Systems in the NHHDA database into temporary tables. The second stage of the process would read the temporary tables to produce a report for each LDSO.

The EACs reported on are those that will be used in Settlement. The impact assessment from the NHHDA software provider is included in Attachment 7.

b) Impact on BSC Agent Contractual Arrangements

No impact.

c) Impact on BSC Parties and Party Agents

The Modification Group conducted an industry impact assessment for the Proposed Modification and Alternative Modification. The full set of Party responses can be found in Attachment 2.

The responses indicate costs to LDSOs, Suppliers, NHHDCs and NHHDA.

For the Proposed Modification, NHHDC would be required to send a D0019 flow to all relevant LDSOs at the same time it sends this flow to the Suppliers and NHHDA.

For the Proposed Modification, the following impacts were noted by respondents:

- **LDSOs:** Costs to implement the proposed solution ranged from £5,000 to £7,000 for those that intended to use the information. One respondent suggested a cost of £50,000 were they to process the information but also indicated they would not use the data so would not actually incur this cost.

Implementation timescales generally ranged between 6 to 9 months with one respondent stating 12 months and another stating 18 months.
- **Suppliers:** Half of the Supplier respondents indicated there would be no costs over and above those that would be attributable to the NHHDC. The remaining Supplier respondents indicated that there would be some costs due to monitoring NHHDCs and from LDSO query management.
- **NHHDCs:** Costs provided by NHHDC respondents were in the range of £6,000 to £45,000. It was noted that the change may not be a particularly large one, however rigorous testing would be required to ensure existing functionality is not impacted.

Implementation timescales suggested ranged from 3 months to 18 months with 6 months being the most common response.

For the Alternative Modification, the NHHDA would be required to send a new flow to relevant LDSOs on a quarterly basis on CD.

For the Alternative Modification, the following impacts were noted by respondents based on information being sent across the DTN. Some respondents noted that savings could be made by sending the information on a CD¹⁸:

- **LDSOs:** One Party provided costs similar to implement the proposed solution of £5,000. One respondent indicated increased costs to be able to receive and accommodate the information across the DTN. It should be noted that these costs would not be incurred under the CD delivery method.

Implementation timescales ranged from 3 to 18 months with the most common period given as 6 months. One respondent noted this was not applicable as they would discard the flow.

- **Suppliers:** Most of the Supplier respondents indicated there would be no costs over and above those that would be attributable to the NHHDA. The remaining Supplier respondents indicated that there would be some costs involved monitoring NHHDA and from LDSO query management.
- **NHHDA:** Some NHHDA indicated that the bulk of the cost would be those to change the NHHDA software and they did not indicate any additional costs. However, three respondents provided further costs. Two respondents provided costs of £12,000 and £25,000 respectively. These costs were based on the requirement to test and implement a new version of the NHHDA software. A further respondent noted that there would need to be Gateway changes at a cost of £5,000. However, the Group noted that these would not be incurred if the information is provided on CD.

Implementation timescales suggested ranged from 3 months to 18 months. One respondent noted that their implementation timescale of 6 months would be once the NHHDA software had been delivered by ELEXONs service provider.

ELEXON contacted those NHHDA who provided costs based on the information being transferred across the DTN to consider whether these costs would be likely to be different if the information was provided on a CD quarterly. The respondent who provided costs of £5,000 indicated that these costs would not change. The respondent who provided a cost of £12,000 indicated that there would be some additional cost (including an ongoing cost) to put in place a process to produce the CD. The respondent who provided costs of £25,000 indicated that providing this data quarterly on CD would be a cheaper option as the only costs applicable to them would be to add the script provided by the software provider to their batch run.

d) Impact on Transmission Company

No Impact.

e) Impact on BSCCo

Area of Business	Impact of Proposed/Alternative Modification
Change Delivery	<p>Change Delivery would be responsible for the implementation of the changes to the BSC and Code Subsidiary Documents as part of a release, co-ordinated with MRASCo. ELEXON would have to manage the required updates to BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems registered in SMRS', BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS' and BSCP515 'Licensed Distribution'.</p> <p>For the Proposed Modification there will only need to be document changes but the Alternative Modification requires additional ELEXON resource to manage the testing and deployment of the NHHDA software.</p>

¹⁸ Note that based on these responses, the Group agreed the current Alternative solution of supplying the new flow information on a CD.

Area of Business	Impact of Proposed/Alternative Modification
Service Delivery	It is anticipated that provision of D0019 or any new flows of data to LDSOs may result in assistance being required for resolution of queries.

f) Impact on Code

Code Section	Impact of Proposed/Alternative Modification
Section S	<p>Section S, paragraph 2.3.2 (i), and Annex S-2, paragraph 4.3 1 (i), of the BSC require the NHHDC to provide validated Metered Data and Metering System reports to the relevant Supplier and the Relevant LDSO.</p> <p>Section S, paragraph 2.3.2 of requires NHHDC to provide Estimated Annual Consumption data and Annualised Advance data to relevant Non Half Hourly Data Aggregator. Section S, Annex S-2, paragraph 4.3.1 (h) requires each Supplier to ensure that each of its NHHDC shall (amongst other things) provide Annualised Advance data and Estimated Annual Consumption data to the relevant NHHDA</p> <p>For the Proposed Modification, the BSC would need to make it clear that there is an obligation on the NHHDCs to provide Estimated Annual Consumption data and Annualised Advance data to the relevant LDSOs. It would also be necessary for the BSC to state that NHHDCs have an obligation to identify the relevant LDSOs and process the data to ensure that each LDSOs only receives data relating to that LDSO.</p> <p>For the Alternative Modification, the BSC would need to make it clear that there is an obligation on the NHHDCs to provide a new flow of data to the LDSO.</p>

A copy of the draft legal text to give effect to these changes can be found in Appendix 1.

g) Impact on Code Subsidiary Documents

Document	Impact of Proposed/Alternative Modification
BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	For the Proposed Modification, this BSCP would be updated to note the additional interface between NHHDCs and LDSOs for sending the D0019 flow.
BSCP505 'Non-Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	For the Alternative Modification, this BSCP would be updated to note the additional interface between NHHDCs and LDSOs for sending the new data flow.
PSL120 'Non-Half Hourly Data Collection'	An amendment could be made to PSL120. HOWEVER, this PSL is scheduled for removal at the June 2008 Release and has been out for impact assessment as CP1213. Therefore it is unlikely that change would be necessary.
SVA Data Catalogue Volume 1	<p>For the Proposed Modification, this data catalogue would be updated to add the LDSO to the list of recipients to the D0019.</p> <p>For the Alternative Modification, this data catalogue would be updated to add the new data flow to be sent to LDSOs.</p>

h) Impact on Core Industry Documents/System Operator-Transmission Owner Code

Document	Impact of Proposed/Alternative Modification
Master Registration Agreement products	<p>This impact was considered under the Terms of Reference. See Section 3.4.</p> <p>For the Proposed Modification, changes to the DTN and DTC would be required to indicate that the LDSO would be an additional recipient of the D0019 flow and to reconfigure the network gateways to allow the D0019 to be passed from NHHDCs to LDSOs. These changes would be progressed only if the Proposed Modification were to be approved, and the implementation timetable would need to allow an appropriate period for change.</p> <p>For the Alternative Modification, no changes to the DTN or DTC are envisaged as the information would be send from the NHHDA to the LDSO via CD, not the DTN.</p> <p>The Impact Assessment from Electralink can be found in Attachment 3.</p>

i) Impact on Other Configurable Items

No impact.

j) Impact on BSCCo Memorandum and Articles of Association

No impact.

k) Impact on Governance and Regulatory Framework

No impact.

Appendix 5: Data items for new data flow: Alternative Modification

Flow Name:	<i>TBC</i>		
Flow Description:	<i>TBC</i>		
Flow Ownership:	BSC		
From	To	Version	
NHHDA	Relevant LDSO	1.0	

Data Items:

Reference	Item Name
J1099	Energisation Status ID
J0081	Estimated Annual Consumption
J0330	File Sequence Number
J0066	GSP Group ID
J1104	GSP Group
J0147	Line Loss Factor Class ID
J0109	Instruction Number
J0083	Metering System ID
J0071	Profile Class ID
J0328	Significant Date
J0076	Standard Settlement Configuration ID
J0078	Time Pattern Regime
J1109	Type Code