

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|--|
| Respondent: | Vasu Mistry |
| Company Name: | Southern Electric Power Distribution ; Keadby Generation Ltd ; SSE Energy Supply Ltd ; SSE Generation Ltd ; and Scottish Hydro-Electric Power Distribution Ltd ; Medway Power Ltd ; SSE Metering Ltd ; |
| Role of Respondent | Supplier/Generator/ Trader / Party Agent / Distributor |
| Does this response contain confidential information? | |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | No | We are happy with our current processes which provide us with all the information we need. Any changes would impact our systems and processes and we do not wish to incur any costs. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | As above |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | We would not be using this data. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | We will not be making any savings by using this process; it would just be an additional cost and lower quality of data. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 18 months |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | No | As per our response to 1 |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | Significant changes would be required to our systems and processes for no additional benefit. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | We would still want to process the D0010, D0149 and D0150. There would be a cost associated in stopping the processing. |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 18 months. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | No | We are opposed to this solution as we already have adequate processes in place. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | Significant changes would be required to our systems and processes for no additional benefit |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | We would still want to process the D0010, D0149 and D0150. There would be a cost associated in stopping the processing. |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 18 months |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes | Automated process, no significant issues. |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|---|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | We are opposed to this solution. |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | We are opposed to this solution. |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | We will not be making any savings by using this process; it would just be an additional cost and lower quality of data. |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes | Monitoring NHHDC sending of D0019. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes | Monitoring NHHDA sending of new flow. |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | Significant costs |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | 18 months. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes | Potentially duplicate queries to NHHDC. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | No | We do not see the benefit for suppliers paying for the data to be prepared when distributor can already prepare from the flows they have received already. |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different | We will not be making any savings by using this process; it would just be an additional cost and lower quality of data. |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|---|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | We will not be making any savings by using this process; it would just be an additional cost and lower quality of data. |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | Significant changes would be required to our systems and processes. |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | We do not wish to implement. |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | 18 months |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | Significant changes would be required to our systems and processes. |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | 18 months. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

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This pro-forma is divided by expected recipient type:

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- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDA's please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 Impact Assessment'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|---|
| Respondent: | <i>Stuart Scott – Data Processing Manager</i> |
| Company Name: | <i>IMServ Europe Ltd</i> |
| Role of Respondent | <i>BSC Agent – NHHDC and NHHDA</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|-----------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale | | | | | | | | | | | | | | |
|--|--|-----------------------|--|-----------------------------|---------------|--|---------------|---------------------|---------------|---|--------------|-------|--|-------|---------------|-------|--|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | <p>Exact costs are unknown at this stage as no detailed analysis has taken place, but rough ball park figures would be in the order of,</p> <table><tr><td>Development of code changes</td><td>- 10 man days</td></tr><tr><td>Testing of code changes (including full regression testing)</td><td>- 20 man days</td></tr><tr><td>UAT of code changes</td><td>- 10 man days</td></tr><tr><td>Implementation of code changes and documentation changes</td><td>- 5 man days</td></tr><tr><td colspan="2">-----</td></tr><tr><td>TOTAL</td><td>- 45 man days</td></tr><tr><td colspan="2">-----</td></tr></table> <p>As this change is in the core D0019 creation modules, great care needs to be taken to ensure that existing functionality is not affected by this change. A change in this area would require full regression testing which adds time and cost to the changes.</p> <p>How many LDSOs would actually use this information? A more cost effective solution would be to get suppliers to pass on D0019 information to LDSOs if and when they request them.</p> | Development of code changes | - 10 man days | Testing of code changes (including full regression testing) | - 20 man days | UAT of code changes | - 10 man days | Implementation of code changes and documentation changes | - 5 man days | ----- | | TOTAL | - 45 man days | ----- | |
| Development of code changes | - 10 man days | | | | | | | | | | | | | | | | |
| Testing of code changes (including full regression testing) | - 20 man days | | | | | | | | | | | | | | | | |
| UAT of code changes | - 10 man days | | | | | | | | | | | | | | | | |
| Implementation of code changes and documentation changes | - 5 man days | | | | | | | | | | | | | | | | |
| ----- | | | | | | | | | | | | | | | | | |
| TOTAL | - 45 man days | | | | | | | | | | | | | | | | |
| ----- | | | | | | | | | | | | | | | | | |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | <p>If we were to have to implement such a solution for sending D0019s to distribution businesses we would strongly favour sending these flows along the same timescales as D0019s are currently sent to NHHDA agents and suppliers i.e. every day. Any deviation from this to batch up files and send weekly or monthly would add processing time to NHHDC D0019 production runs and incur extra development costs for non standard processing.</p> <p>When creating D0019s instead of adding data to just 2 files (DA and supplier and additional distributor set of files would be created.</p> <p>We concur that the only way the DC knows who the distributor is by the first two digits of the MPAN and checking this back to MDD.</p> |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | <p>A change of this type would require at least 6-9 months specifying, developing, testing and implementing. This has the potential to have an effect on settlements as it would mean making changes to core D0019 production modules within the NHHDC system which would add risk to settlements and would require a lot of testing.</p> |

NHHDA

| Q | Question | Response ¹ | Rationale |
|---|----------|-----------------------|-----------|
|---|----------|-----------------------|-----------|

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | <p>Code changes to the core NHHDA application would need to be made centrally by Logica so we cannot comment on the cost of this.</p> <p>IMServ would incur cost from testing and implementing the new version of the software. This would involve setting up an internal project as per all other NHHDA releases. The average cost of this all in would be expected to be in the region of approx 15 -30 man days depending on the complexity and amount of the changes made by Logica. It is impossible to quantify this at this point in time but I would expect this to be in the upper part of the quote.</p> <p>This would impact Business as usual operations as well as another flow means more daily , weekly or month checks, thus creating extra work for NHHDA agents.</p> <p>The NHHDA system should not really be used to send out consumption data it should only receive it as this is the main function of the NHHDA system. It doesn't really make sense for NHHDA to send out consumption data as this is the job of the NHHDC agent.</p> |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | Dependent on Logica development times but we would need at least 6 months from the date the code is delivered to us to test and implement. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

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| | |
|---|------------------------|
| Respondent: | Dave Morton |
| Company Name: | EDF Energy |
| Role of Respondent | Supplier / Party Agent |
| Does this response contain confidential information? | No |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|-----------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|--|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | No | As flows sent directly from NHHDC to LDSO we see no impact on us as a Supplier with this proposal. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | No | As flows sent directly from NHHDA to LDSO we see no impact on us as a Supplier with this proposal. |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | We cannot provide accurate estimates for this as requirements do not provide enough information to determine if data is just extracted from a D0019 or requires some calculation and if form of data provision is going to be via email of spreadsheet/text data. We feel that it would cost a minimum of £20k to provide a facility to produce quarterly data based on D0019s received in quarter and a process to fill in any gaps where no D0019 has been received in that quarter. This is based on exporting a text file for manual processing onwards to LDSO but we do not feel that this is a robust solution. |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | We would need between 9-12 months notice to enable this to be scheduled. This is due to unknown final definition of requirements, unknown method of data delivery and problems in fitting such a change into other work currently scheduled. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | It is not possible to determine if this would replicate Supplier processes as each LDSO would be able to choose how they decide query data. It is likely though that many of MPANs that a Supplier would query would also be queried by LDSOs. This would lead to replication from a NHHDC point of view. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | No | This could end up with several different methods of data provision and as such could require different extract requirements. We feel that this could give rise to unnecessary costs for a Supplier in provision of this data. |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|---|
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Different | As a Supplier we have no direct costs for proposed modification. In this approach we would need to develop changes to enable data provision but we would note that we do not support this type of approach as it could be much more costly to implement depending on how many LDSOs want data and what data they request and at what frequency. |
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | This does not seem to be a question for a Supplier so unsure why this is included in this section. |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | Estimated at approximately £6k. This is based on an estimate of the time it would take to develop, test and implement this change to the NHHDC code. This is a small change to our systems but rigorous testing is required to ensure no impact to existing D0019 processing. |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | Currently when our NHHDC system creates new consumption information via the EAC/AA system this will be sent to all parties that need to receive it (i.e. Supplier and NHHDA) as appropriate. An additional routine would be added that would also send this information to the Distributor based on the first two digits of the MPAN. |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | We would need at least a 3 month lead time in order to be able to implement this change as we would need to secure requisite resources to code these changes and carry out testing. |

NHHDA

| Q | Question | Response ¹ | Rationale |
|---|----------|-----------------------|-----------|
|---|----------|-----------------------|-----------|

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | Estimated at approximately £12k. This is based on standard amount of time that is required to be able to test and implement a new version of NHHDA software. |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | We would need at least a 3 month lead time in order to be able to implement this change as we would need to secure requisite resources to code these changes and carry out testing. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDA's please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 Impact Assessment'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|-----------------------------------|
| Respondent: | <i>Vara Tadi</i> |
| Company Name: | <i>Electricity North West Ltd</i> |
| Role of Respondent | <i>LDSO</i> |
| Does this response contain confidential information? | |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | No | We would not use the D0019, as we currently process the D0010, D0149 and D0150. We intend to continue to use these data flows as they provide us with all the data we need for our customer service functions. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | As stated in question 1 we have no need for the D0019 as the D0010, D0149 and D0150 provide us with the data we need. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | We would not look to process the D0019 flow, as stated previously, as we already receive the data we require and we do not feel that any additional cost is justifiable. For information only, there would be no business benefit in changing our current processes to handle such a flow, the costs of which are considered to be very significant. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | No cost savings are anticipated as we already have processes to obtain this data from the D0010 Dataflow. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | We would not implement processing of D0019. We would discard it if we received it. |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | No | As stated in our answer to question 1 we are not looking to utilise any other source of data to replace or complement the data currently provided by the D0010, D0149 and D0150 data flows. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | We do not anticipate any costs as we would choose to discard any new flows. |
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | As stated in question 4 we would not look to implement any changes and would choose to discard any new flows. Therefore no savings, although a minor one off cost to discard the flow on receipt. |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | N/A- we would discard the dataflow |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | No | We would make no requests see responses to question 1 and question 6 |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | N/A. |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | See responses to questions 4 and 8. |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | N/A as we would not implement this solution. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes | <p>We currently use the D0010 for site specific billing (PC5-8). This data contained within the D0010 flow, including maximum demand and reactive power metered data, enables us to deliver accurate and cost reflective distribution Use of System Charges to our suppliers' customers which provide clear price signals to use ENW's network efficiently.</p> <p>We actively manage the receipt of D0010 data flows to ensure that the billing of Use of System Charges is based on actual metered data and not estimated data.</p> |
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | We would not make any requests. |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | We would not make any requests. |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | We would insist on continuing to use these data flows for the reasons stated in question 14. |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

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- NHHDCs please respond to questions 26 to 28.
- NHHDA's please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

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Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|--------------------------------------|
| Respondent: | <i>Jonathan Perks</i> |
| Company Name: | <i>British Energy Direct Limited</i> |
| Role of Respondent | <i>Supplier</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|-----------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|---|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | No | As a Supplier, we do not anticipate any extra costs above and beyond those costs already attributable to the NHHDC. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | No | We require further clarity regarding this flow and its destination. |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | Given the lack of information as to exactly what information will be required and in what format, it is not possible to give an approximate figure for this cost. We anticipate medium costs to allow appropriate system and process changes. |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | The implementation period would need to be 6 to 12 months from the Authority's decision to allow appropriate system and process changes to take place. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes | This would replicate Supplier processes and should not be carried out by the LDSO. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | No | This would go against the precept of the development of DCUSA. Entering into a bi-lateral agreement would be a commercial decision and would be considered on an individual basis. |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | As above, this would be a commercial decision and would be considered on an individual basis. |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|---|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | As a Supplier, we are of the opinion that the LDSO are better placed to answer this question. |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

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- NHHDAAs please respond to questions 29 to 30¹.
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| | |
|---|--|
| Respondent: | <i>Name: Glenda Simons</i> |
| Company Name: | <i>GTC – on behalf of The Electricity Network Company</i> |
| Role of Respondent | <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / MRASCo/ other – please state ²)</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

² Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes | We would be able to use the consumption data provided on a D0019 in conjunction with the property type to improve system planning. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | At present we do not process the D0010's. However to do so effectively it would need to validate against the D0149 and D0150. This would be duplicating the DC systems, the cost of which cannot be justified. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | We estimate costs of approximately £7000 to develop a system to process the D0019's. The proposed alternative may be less costly. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | There are not direct processing cost savings. The savings will be in the better understanding of our networks and therefore more efficient planning. In addition, it potentially facilitates us developing arrangements to support Distributed Generation. I.e. Netting off demand with generation outputs. Having EAC data should also enable us to identify irregular consumption patterns. Eg: identify incorrect customer types/property types, theft and consumption on de-energised sites, |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Approx 9 months. We will have to develop a full system specification to process the flows plus development and test. |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes | We support this alternative in preference to the proposed modification. Receiving a snapshot of data quarterly will reduce the processing of receiving the D0019 daily whilst still providing the relevant information to enable system planning. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | If the new flow is provided outside the DTN the costs could be reduced to the proposed mod. If sent on CD/via CSV it could bi-pass costs of additional system/routing changes. There would be less processing requirements quarterly whilst still providing the detailed information to enable efficient planning. |
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | As Question 4. |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Approx 6 months. If provided outside the DTN there would be less system impact for routing but it still requires development for processing the data. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes | We would expect to make requests and receive the data in the same frequency as the potential alternative ie. Quarterly. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | We would expect suppliers to provide the data in the same format as the proposed solutions even if the change was through DCUSA. We foresee substantial administration effort to collate the information from multiple suppliers and suspect not all would provide the data timely if at all. We are wary that Suppliers may apply additional charges for processing costs not originally envisaged. |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | As Question 4. |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Approx 6 months. If provided outside the DTN there would be less system impact for routing but it still requires development for processing the data. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | No | At present we do not process the D0010. However to do so effectively it would need to validate against the D0149 and D0150. This would be duplicating the DC systems, the cost of which cannot be justified. |
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Different | Bi-lateral solutions could lead to different data format and complex admin and handling costs. |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | As Question 11. |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | As Question 4. |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDA's please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---------------------------|--|
| Respondent: | Bryan Donnelly |
| Company Name: | SAIC on behalf of ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd |
| Role of Respondent | <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / MRASCo/</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

| | |
|---|---|
| | <i>other – please state ²⁾</i> Supplier / BSC Agent / Party Agent / Distributors |
| Does this response contain confidential information? | |

²⁾ Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | No | ScottishPower Energy Networks (SPEN) currently has no plans to utilise the D0019 data flow and does not envisage any change to that situation. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | SPEN does not utilise the D0010 at present. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | For SPEN, the utilisation of the D0019 flow would require the development of an entirely new system, complete with DTN interfaces. Because such work would be subject to tender, it is too commercially sensitive to place any sort of value on it here. However, the application of even the most rudimentary knowledge of such costs should serve to inform the debate in this area. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | The provision of the D0019 will not result in any cost savings to SPEN, which will continue to process the D0010, D0149 and D0150 as it presently does. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | SPEN currently has no plans to avail itself of the D0019. However, the receipt of D0019 data flows would need to be catered for, which would mean creating a new DTN interface and, perhaps, extending an existing data warehouse. Therefore, some development would be required, for which SPEN would wish to be allowed around 9 months. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | No | SPEN has no plans to use this data flow at the moment. |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | Provided the data is only made available to those DNOs that specifically request it, the costs to SPEN might be limited to those arising from the DTC changes. Indeed, if this data is provided via means other than the DTN (e.g. by P-flow via CD-ROM or email etc.) then these costs should be limited even further and SPEN would have no objection to their earliest implementation. |
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | As SPEN would not seek to utilise this flow, it would not realise any costs savings as a result of the implementation of the Potential Alternative Modification. |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | If a non-DTC solution is to be implemented, then SPEN would only require around 10 Days. If a DTC based solution is to be implemented, then this requirement will increase to 9 months. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | No | N/A |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | For SPEN, the utilisation of a D0019-equivalent flow would require the development of an entirely new system. Because such work would be subject to tender, it is too commercially sensitive to place any sort of value on it here. However, the application of even the most rudimentary knowledge of such costs should serve to inform the debate in this area. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | N/A |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Although SPEN has no plans to avail itself of this D0019-equivalent, the receipt of the data would need to be catered for, which would require a data warehouse of some sort. Therefore, it is reasonable to assume that some development would be required, for which SPEN would wish to be allowed around 9 months. |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | No | <p>This would require the development of an entirely new system, as well as processes, to utilise either the D0010 or the D0019. The development of such a system would be subject to tender, and so it would be inappropriate to speculate in the value at this time.</p> <p>Nonetheless, SPEN would posit that these costs would likely be prohibitive, and yet it would expect to receive little or no resultant benefit.</p> |
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | N/A |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | For SPEN, the utilisation of such data would require the development of an entirely new system. Because such work would be subject to tender, it is too commercially sensitive to place any sort of value on it here. However, the application of even the most rudimentary knowledge of such costs should serve to inform the debate in this area. |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|--|
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | However, SPEN believes that the general industry costs might rise as a result of such the implementation of any of the proposals, but would suggest that the Potential Alternative Proposal (i.e. the use of regular snapshots of EACs in NHHDA) appears to offer the least cost option, while addressing the requirements stated in the proposal. |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | No | Without any Supplier system changes arising from it, SPERL would require only minimal notice to implement the proposal. However, in recognition of its overarching responsibility for its appointed agents' market performance, would ask for at least nine months. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | No | <p>As with the Proposed Modification, SPERL anticipates all of the immediate costs associated with the implementation of the Potential Alternative Modification to be attributable to the NHHDA.</p> <p>Without any Supplier system changes arising from it, SPERL would require only minimal notice to implement the proposal. However, in recognition of its overarching responsibility for its appointed agents' market performance, would ask for at least nine months.</p> |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | <p>On the face of it, placing the obligation on the Supplier might merely see it forward the D0019s to the LDSO. However, SPERL does not currently utilise these data flows, so such a change would require either:</p> <ul style="list-style-type: none"> entering into contractual agreements with each of its appointed NHHDCs, who would then face the same system costs as they would attract in the case of the Proposed Modification; or the development of a completely new Supplier system to sort the D0019 data according to Distributor. <p>It is SPERL's view that neither of the above options would be welcomed by Suppliers, who would reap no benefit from this considerable expenditure.</p> |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | The timeframe necessary will vary depending on whether SPERL was to adopt a contractual approach or to develop a new system/extend the functionality of an existing system. However, at minimum, it is likely to need around nine months to implement. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | No | SPERL currently operates no such process. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes | The costs for providing this information will be largely the same irrespective of the number of LDSOs that request it. The only difference, then, is in how these costs are met i.e. through the BSC, by the LDSO community or through bi-lateral agreements with the individual LDSO making the request. |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Different | <p>Because the Supplier will be required to establish the method through which it would meet such <i>ad hoc</i> requests, the costs would resemble those that would arise through the DCuSA change approach, although the burden of cost in this case would lie with the LDSO rather than the Supplier.</p> <p>Of course, as it is the LDSO that would request the information, it is appropriate that it accepts that cost burden, but it is an equally important principle that this burden should not be an unreasonable one.</p> |
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | <p>Presumably this question should have read: "...Suppliers confirm any savings that the new flow would provide".</p> <p>As there is no suggestion that these flows would no longer be required, the costs to Suppliers would remain the same.</p> |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | Changes would be required to the systems to allow the D0019 to be generated and sent to the appropriate LDSO / IDSO |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | There is a table in the NHHDC system which associates MPIDs with the MPANS This will allow us to create D0019s |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | 180 Days |

NHHDA

| Q | Question | Response ¹ | Rationale |
|---|----------|-----------------------|-----------|
|---|----------|-----------------------|-----------|

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|---|
| 29. | <p>Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale</p> | - | <p>The majority of the implementation costs would be met centrally through ELEXON's contract with its service provider. However, there would be an operational cost associated with the execution of the script and the provision of the output.</p> <p>Its is SP Dataserve's view that:</p> <ul style="list-style-type: none"> • this information should be provided on request; • the LDSO should be limited to 4 requests per year, with additional, ad hoc, requests subject bi-lateral agreement; • that the information would be better provided via email or CD-ROM; and • that a Pxxxx flow should be created, rather than a DTC flow. <p>SP Dataserve's rationale for the above is that it reduces the:</p> <ul style="list-style-type: none"> • cost burden for LDSOs that do not want the data; • cost burden for individual NHHDCs and Suppliers; and the • change management cost overhead by removing the DTC element. <p>The other advantage form this approach is that the data has already been subject to NHHDA validation, which should mean that the Profile Class and Standard Settlement Configuration should be as held on the MPAS system.</p> |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|---|
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | The time to implement will depend largely on ELEXON's service provider, but SP Dataserve is of the view that the change could be implemented as early as February 2009. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

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- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|---|
| Respondent: | <i>Hazel Cotman</i> |
| Company Name: | <i>EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc and EDF Energy Networks (SPN) plc</i> |
| Role of Respondent | <i>Distributor</i> |
| Does this response contain confidential information? | |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|---|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | No | Although, we would like, to have a view, of the EACs and AAs data going into Settlements. We have no current plans to use the D0019 data as intended. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | We currently process the D0149/D0150 and the D0010 data flows to calculate site specific consumption data. It is unlikely our internal processes would change, in the near future, to accommodate the processing of the D0019 data. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | We would will have IT costs to build in the functionality to receive the D0019's data and we expect these costs to be in the region of £50k |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | We envisage IDNO's have the potential to make savings using the D0019 data but we do not expect to make any savings ourselves. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | We would need a minimum of nine months to accommodate the Proposed Modification |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | No | |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | Our system costs would be higher to accommodate a new data flow. We are not support of data flows being sent via email rather than across the DTN. However, we can see the benefit in the Proposed Modification whereby the new data flow would be required to be sent quarterly rather than everytime a D0019 is generated by the NHHDC. |
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | We are not favour of this solution as it could place an obligation outside of the BSC on Suppliers/ Data Collectors to send LDSO's Settlement data. We do not current envisage making (ad-hoc) requests to Suppliers for the D0019 data. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | We feel this could potentially be the most costly solution proposed especially if a new data flow is required |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | This would depend upon the nature of the DCUSA change proposal |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes | |
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

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- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

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| | |
|---|--------------------|
| Respondent: | <i>Emma Ward</i> |
| Company Name: | <i>CE Electric</i> |
| Role of Respondent | <i>Distributor</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|------------------------|---|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes | Assuming that the cost benefits analysis supports the use of the D0019. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | No | CE currently has a process to utilise D0010 flows. Therefore, D0019 data would be received in addition to D0010 flows. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | Not known at this time | More time would be required to assess the cost implications. (i.e. internal gateway configuration, IT support costs, etc). |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | No savings | D0019 processing would be over and above D0010 processing as per the response to question two. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | Not known at this time | More time would be required to accurately assess this. It is likely to be in the region of 12 months to implement this solution. |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | No | The new flow does not contain annualised advance (AA) data like the D0019 dataflow. Therefore the D0019 dataflow would be of more benefit to CE in carry out specific consumption analysis. |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | Not known at this time | More time would be required to assess the cost implications. (i.e. internal gateway configuration, IT support costs, etc). |

| Q | Question | Response ¹ | Rationale |
|-----|--|-------------------------|---|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not Different | No savings. D0019 processing would be over and above D0010 processing as per the response to question two. |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | Not known at this time | More time would be required to accurately assess this. It is likely to be in the region of 12 months to implement this solution. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes, on an ad-hoc basis | Currently on an informal ad-hoc basis CE work collaboratively with suppliers on data quality issues as suppliers have data available to them, which is not available to CE. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | Not known at this time | More time would be required to assess the cost implications. (i.e. internal processes, resource required, etc). |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not Different | No savings. D0019 processing would be over and above D0010 processing as per the response to question two. |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | Not known at this time | More time would be required to accurately assess this. It is likely to be in the region of 12 months to implement this solution. |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | No | Without performing a full impact assessment initial thoughts are this would be a time consuming and costly process. |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|---|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | Currently on an informal ad-hoc basis CE work collaboratively with suppliers on data quality issues as suppliers have data available to them, which is not available to CE. |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | More time would be required to assess the cost implications. (i.e. internal processes, resource required, etc). |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | No Savings. D0019 processing would be over and above D0010 processing as per the response to question two. |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|--------------------------------|
| Respondent: | <i>Name: Andrew Manning</i> |
| Company Name: | <i>RWE Npower</i> |
| Role of Respondent | <i>(Supplier/ Party Agent)</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----------|---|------------------------------|------------------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes | Not aware of any additional cost/ time requirements on Supplier which are not attributable to NHHDC, however costs to DC to implement would ultimately be passed through to the Supplier. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes | Not aware of any additional cost/ time requirements on Supplier which are not attributable to NHHDA, however costs to DA to implement would ultimately be recovered from Supplier as a central cost. |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | £45K inclusive cost. This is based on similar existing recurring data requests. |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | Cost of £45K represents about 90 man days or tasks that could be completed in about 3 to 4 elapsed months from an agreed start date. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Possibly | Would require liaison with LDSOs as to what processes they would look to introduce. Any introduction of queries from LDSOs would have to be properly managed to ensure that DC FTE resource is available to handle these and ensure the request gets to the right place. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes | Reasonable cost to provide data could be recovered through bi-lateral agreement and onus would be placed on LDSO to identify commercial benefit before entering into such a bi-lateral agreement. |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Different | Would depend on terms of bespoke bi-lateral agreement based on requirements of LDSO. |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|---|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | We understand this question is to be deleted. |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | Approximate costs for the proposed modification are £45k. These costs do not allow for any additional or variations to the requirements as currently set out. The costs are based on the production of an additional D0019 and transmission to the LDSO as per current functionality |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | At a high level, npower NHHDC would make changes to the database tables and alter the logic that generates file and instruction sequencing numbers. npower NHHDC would also have to amend the D0019 generation to determine the LDSO and subsequently transmit a copy of the flow to the relevant LDSO |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | npower NHHDC would require the absolute minimum of six months to develop and test the above solution. |

NHHDA

| Q | Question | Response ¹ | Rationale |
|---|----------|-----------------------|-----------|
|---|----------|-----------------------|-----------|

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | <p>Approximate costs for the proposed modification are £25k.</p> <p>The costs are based on the assumption that a complete and accurate regression pack is provided by ELEXON to accompany the change and that the business do not require any additional testing to be undertaken.</p> <p>The above costs also exclude any 3rd party costs e.g. porting costs</p> |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | npower NHHDA would require nine months to develop and test the above solution |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

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- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|--------------------------|
| Respondent: | <i>Name Glenn Sheern</i> |
| Company Name: | <i>E.ON UK</i> |
| Role of Respondent | <i>Supplier</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|-----------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|--|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | There is unlikely to be any increased costs to suppliers in terms of IS. However we would see increased costs involved with query management from LDSOs and from a change to the contractual arrangements with NHHDCs. |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | Same as 18 above. |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | Not possible to confirm costs at this time. It should be possible to extract this data, although the process may be difficult as the D0019 does not contain a file header to identify LDSO or a settlement date. If the NHHDC were to do this work there would be an obvious cost to suppliers that we believe should be borne by LDSOs. |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | Non BSC process take more time to implement 6-9 months should be sufficient. |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | Our current experience is that LDSOs that currently use existing flows do not produce significant queries. The level of query suggested in footnote 8 however would incur considerable cost above and beyond that incurred by the LDSO. |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | This would seem to be a sensible solution particularly if not all LDSOs require such a huge volume of data. If agreement was to be reached it is best managed in a standard form, variation from this would cause significant overheads. |

| Q | Question | Response ¹ | Rationale |
|-----|--|------------------------------|---|
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | An agreed industry script would need to be implemented and there may be some technical constraints in the way the data is delivered. The most effective method would be for the final report to be exchanged via the DTN with costs being borne by the LDSOs. |
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|-----------|
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

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- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Tuesday 25 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|-------------------------------------|
| Respondent: | <i>Alastair Barnsley</i> |
| Company Name: | <i>E.ON Energy Services Limited</i> |
| Role of Respondent | <i>Party Agent</i> |
| Does this response contain confidential information? | <i>Yes</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----------|---|------------------------------|------------------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | It is currently envisaged that the costs associated with the proposed modification would be in the region of £10,000 |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | The relevant LDSOs will be sent the relevant information in the form of a D0019 flow |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | 6 Months |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | Whilst this Modification would not necessitate any development on our part of the NHHDA software it would be necessary to re-configure our gateway at an approximate cost of £5,000. It is our opinion that the alternative modification would have significant data quality advantages over the proposed modification due to the current number of disputed D0019s |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | 6 months |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|----------------------------|
| Respondent: | Graham Smith |
| Company Name: | Western Power Distribution |
| Role of Respondent | Distributor |
| Does this response contain confidential information? | No |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes | Since the rejection of modification P043 we have utilised existing data flows in order to obtain site specific consumption details at NHH level. Unfortunately, due to issues such as missing flows and incompatible data between flows, the result of this processing is far from perfect. In order to make the best judgements when considering issues relating to the most efficient use of the distribution network, including the identification of areas where incentives could be given to encourage the connection of embedded generation, it is important that the information we have is as accurate as possible. We believe D0019s would improve the quality of this information. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | | <p>We will use D0019 data instead of D0010 data in some cases but will still utilise the D0010 to for other non-settlement data, for example readings from Maximum Demand registers.</p> <p>The D0019 data would be used in place of current processes whereby we attempt to calculate an "EAC" by processing D0010, D0149 and D0150 data.</p> |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | Very low, probably less than £5,000 to implement the change and <£1,000 per year thereafter. Our systems are already capable of receiving and holding an EAC so we would simply need to drop the D0019 EAC in to the system instead of the value we currently calculate. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | Savings would be negligible. We would potentially decommission parts of our existing process over time, after we have built up a full set of D0019 EAC values. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 6 months from Authority decision. System changes would be required and we would need sufficient notice to plan and implement. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes | Same as answer to question 1. This alternative is our preferred solution as we consider it would be more accurate than D0019 data and less costly for the industry to implement. |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | Similar to the proposed modification, around £5,000 to implement and <£1,000 annually thereafter. |
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 6 months from Authority decision. System changes would be required and we would need sufficient notice to plan and implement. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | We would probably ask for a quarterly update as this would offer a reasonable balance between keeping the records as up to date as possible. Obviously we would need to take in to account the cost of receiving a quarterly update versus the cost of receiving less frequent updates. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | Assuming quarterly processing this would increase the cost of processing the data, over and above the proposed and potential alternative solutions, by around £2,000 per year. |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | 6 months. System changes would be required and we would need sufficient notice to plan and implement. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes | <p>We currently calculate an EAC value from data contained in the D0010. This process also requires us to process D0149 and D0150 flows.</p> <p>It is estimated that values calculated are only accurate in around 90% of cases, due to issues such as missing data flows and inconsistencies in data between the flows. We could improve the accuracy significantly if we introduced additional validation processes and queried inconsistent data but this would probably cost around £100,000 per year and would generate around 5,000 queries which would be sent to Suppliers.</p> |
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different | <p>We would aim for the same frequency. However, we do not believe this is a workable solution. Unless there is some governance mandating the provision of the data we do not believe we could get what we need in a consistent format from all Suppliers. The additional overheads such as procurement costs would also be a barrier to this solution, particularly for IDNOs.</p> |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Different | <p>The additional costs in procuring bilateral agreements with every Supplier would add significantly to our costs. Unless we could achieve consistent delivery dates and file formats there would be additional administration and processing costs. The additional cost would probably be upwards of £10,000 per year.</p> |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

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- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

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Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|--------------------------------|
| Respondent: | <i>Lisa Smith</i> |
| Company Name: | <i>Siemens Energy Services</i> |
| Role of Respondent | <i>Party Agent</i> |
| Does this response contain confidential information? | |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----------|---|------------------------------|------------------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | Automated solution would be provided via a system change. |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | Approx 120 days. |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|--|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | This is our preferred option. However, without having a detailed solution on the changes to the NHHDA system, it is difficult to provide an estimate of costs. |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | Again, this would be dependant on changes to NHHDA, but we usually require a minimum of 90 days. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

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| | |
|---|--|
| Respondent: | <i>Jane Griffith</i> |
| Company Name: | <i>Central Networks East and West (Joint response)</i> |
| Role of Respondent | <i>Distributor</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----|---|-----------------------|--|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes | Currently use D0010 for planning, turn meter readings into EACs to calculate load on substations. |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes | Will replace processing of D0010. Currently spend 290 work hours processing the D0010 into EACs when examining load on LV network, estimate cost of £25 per work hour to give £7,250 per annum. This is for both areas, 145 work hours should be assumed for each area separately. |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | £1000 – minor changes to be able to read the data flow into a system and add the information to the reports, 40 IT work hours. |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | £6,250 saving in first year and £7,250 per annum subsequently, currently spend 290 engineer work hours per year converting this data into EACs as required. |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Immediate – we can amend DRAFTS to capture the data straight away and set the IT requirements up shortly afterwards. |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes | This is even less data than the D0019 and is only the items we need, so would be preferable to having to process the D0019. |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | £600 – minor changes to be able to read new file into a system, less work than the proposed as less fields to incorporate, estimate 24 IT work hours. |

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Immediate – we can amend DRAFTS to capture the data straight away and set the IT requirements up shortly afterwards. |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes | Quarterly – this is sufficient to keep our systems up to date given the inherent error in EAC vs. meter reading caused by smoothing effect and default EACs, any more frequent than this would not gain us anything in terms of data quality and reliability and would cause more work for others. |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | £600 – once the system is set up as in proposed and alternate modification, the files would just be sent to the database and uploaded as they were received, no extra cost. |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | Immediate – we can amend DRAFTS to capture the data straight away and set the IT requirements up shortly afterwards. |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes | Currently spend 290 engineer work hours per year converting this data into EACs as required, the D0019 or equivalent solution could be a one-off cost of about 24 work hours with minor ongoing maintenance required. Main issue is where the load on a substation is being examined and the data is incomplete, this is especially important as decisions about reinforcement will be made on the load currently on that part of the system. |

| Q | Question | Response ¹ | Rationale |
|-----|---|-----------------------|--|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Different | If a supplier does not agree it would render this whole process pointless as we would still have missing data and be in no better a position than the current D0010 process. |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|-----------|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |

P222 REQUIREMENT SPECIFICATION - IMPACT ASSESSMENT QUESTIONS

BSC Parties ("Parties") and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

This pro-forma is divided by expected recipient type:

- LDSOs please respond to questions 1 to 17.
- Suppliers please respond to questions 18 to 25.
- NHHDCs please respond to questions 26 to 28.
- NHHDAAs please respond to questions 29 to 30¹.
- MRASCo please respond to questions 31 to 34.

Please send your responses by **12:00 on Thursday 27 March 2008** to modification.consultations@elexon.co.uk and please entitle your email 'P222 **Impact Assessment**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma or further comments regarding the potential solutions should be addressed to Chris Stewart on 020 7380 4309, email address chris.stewart@elexon.co.uk.

| | |
|---|---|
| Respondent: | <i>Seth Chapman</i> |
| Company Name: | <i>AccuRead Ltd</i> |
| Role of Respondent | <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributor / MRASCo/ other – please state ²) NHHDC/NHHDA/MOP</i> |
| Does this response contain confidential information? | <i>No</i> |

¹ ELEXON will be seeking an Impact Assessment from the NHHDA software provider in parallel.

² Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Licensed Distributor System Operators (LDSOs)

| Q | Question | Response ¹ | Rationale |
|----------|---|------------------------------|------------------|
| 1. | Proposed Modification: LDSOs confirm whether they would intend to use the D0019 data if it is sent to them. Please give rationale. | Yes / No | |
| 2. | Proposed Modification: LDSOs confirm if the D0019 data will replace current processing of D0010 data (or any other data to derive D0019 equivalent information), or be used in addition to current D0010 processing (if the LDSO has other processes to establish D0019 equivalent data please state what this is). Please give rationale. | Yes / No | |
| 3. | Proposed Modification: LDSOs confirm the expected costs to process the D0019 flows to the level they would intend to use this data. Please give rationale. | - | |
| 4. | Proposed Modification: LDSOs confirm any savings that the D0019 will provide from reduced processing of D0010, D0149 and D0150s (if the LDSO has other processes to establish D0019 equivalent data please state any potential savings from using D0019 instead). Please give rationale. | - | |
| 5. | Proposed Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 6. | Potential Alternative Modification: LDSOs confirm whether they would intend to use the new data flow if it is sent to them. Please give rationale. | Yes / No | |
| 7. | Potential Alternative Modification: LDSOs confirm the expected costs to process the new flows in accordance with the anticipated level they would use the data. Please give rationale. | - | |

| Q | Question | Response ¹ | Rationale |
|-----|--|---------------------------|-----------|
| 8. | Potential Alternative Modification: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. | Not different / Different | |
| 9. | Potential Alternative Modification: LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 10. | Non-BSC Solution (DCUSA change): LDSOs indicate whether, and how frequently, they would make requests for D0019-equivalent data under the new DCUSA provisions. Please give rationale. | Yes / No | |
| 11. | Non-BSC Solution (DCUSA change): LDSOs confirm the expected costs to manually collate the data from multiple Suppliers. Please give rationale. | - | |
| 12. | Non-BSC Solution (DCUSA change): If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150s. Please give rationale. | Not different / Different | |
| 13. | Non-BSC Solution (DCUSA change): LDSOs to confirm the time required to implement the solution. Please give rationale. | - | |
| 14. | LDSO processing current BSC flows: LDSOs confirm whether they currently use D0010 flows to calculate site specific consumption data. <ul style="list-style-type: none"> If no, what is the estimated cost and time requirements to introduce such a process. Additionally, what are the perceived benefits of, and/or barriers to, its introduction? If yes, what is the cost of this process and what problems, if any, do you experience? | Yes / No | |

| Q | Question | Response ¹ | Rationale |
|-----|---|------------------------------|-----------|
| 15. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 10), LDSOs confirm why it is different, and whether, and how frequently, they would make ad-hoc requests for D0019-equivalent data. Please give rationale. | Not different / Different | |
| 16. | Supplier/Distributor agreements: If different to the non-BSC solution (Question 11), LDSOs confirm the expected costs to make ad-hoc requests and manually collate the data from multiple Suppliers. Please give rationale. | Not different / Different | |
| 17. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

Suppliers

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 18. | Proposed Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDC). Please give rationale. | Yes / No | |
| 19. | Potential Alternative Modification: Please indicate any cost or time requirements for implementation (which is not attributable to the NHHDA). Please give rationale. | Yes / No | |
| 20. | Non-BSC Solution (DCUSA change): Suppliers to confirm costs to provide site specific consumption data (assume all LDSOs request quarterly and at the same time). Please give rationale. | - | |
| 21. | Non-BSC Solution (DCUSA change): Suppliers to confirm the expected time required to implement the solution. Please give rationale. | - | |
| 22. | LDSO processing current BSC flows: Suppliers confirm whether LDSOs introducing processes to query missing and inconsistent D0010s would largely replicate processes already undertaken by the Supplier. Please give rationale. | Yes / No | |
| 23. | Supplier/Distributor agreements: Suppliers to indicate willingness to enter bi-lateral agreements with multiple LDSOs to provide this information. Please give rationale. | Yes / No | |
| 24. | Supplier/Distributor agreements: If different to the Proposed Modification, Suppliers to confirm costs to respond to ad-hoc requests (assume all LDSOs request quarterly and at the same time), and confirm why these are different. Please give rationale. | Not different / Different | |

| Q | Question | Response ¹ | Rationale |
|-----|---|---------------------------|-----------|
| 25. | Supplier/Distributor agreements: If different from the Proposed Modification (Question 4), LDSOs confirm any savings that the new flow would provide from reduced processing of D0010, D0149 and D0150's. Please give rationale. | Not different / Different | |

NHHDCs

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 26. | Proposed Modification: NHHDCs confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale. | - | This would require a change to a core part of our NHHDC system, as such detailed analysis would need to be carried out to determine the full extent and complexity of any this change,. However an early estimate at current prices would be is in the order of £23k. |
| 27. | Proposed Modification: Please describe how you would implement the solution. | - | Initial analysis suggested that we would look to duplicate every D0019 sent to a supplier and send it to the LDSO. |
| 28. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | We would require a minimum of 6 months to implement this change for confirmation of approval. |

NHHDA

| Q | Question | Response ¹ | Rationale |
|-----|--|-----------------------|---|
| 29. | Potential Alternative Modification: NHHDA to confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). Please give rationale | - | As this is a flow from NHHDA we would expect this to be included in the current NHHDA software from Elexon, therefore the current service provider would need to provide the cost for making this change. |
| 30. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | As Q29, however note the next possible release for NHHDA software is Feb 09. |

MRASCo

| Q | Question | Response ¹ | Rationale |
|----------|--|------------------------------|------------------|
| 31. | Proposed Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 32. | Proposed Modification: Please confirm the expected time required to implement the solution. | - | |
| 33. | Potential Alternative Modification: Please confirm the costs to implement the solution (and provide any more cost effective solutions if these have been identified). | - | |
| 34. | Potential Alternative Modification: Please confirm the expected time required to implement the solution. | - | |