



Responses from P213 Second Assessment Report Consultation

Consultation Issued on 4 July

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Central Networks	P213_AR_01	2	0
2.	The Micropower Council	P213_AR_02	0	1
3.	UDMS	P213_AR_03	0	3
4.	British Energy	P213_AR_04	5	0
5.	Centrica	P213_AR_05	9	0
6.	Good Energy	P213_AR_06	1	0
7.	Scottish & Southern Energy	P213_AR_07	6	1
8.	Npower Limited	P213_AR_08	10	0
9.	Siemens Energy Services	P213_AR_09	0	6
10.	Imserv	P213_AR_10	0	3
11.	E.ON UK Energy Services Limited	P213_AR_11	0	1
12.	Scottish Power Ltd	P213_AR_12	7	2
13.	Western Power Distribution	P213_AR_13	2	1
14.	AccuRead Ltd	P213_AR_14	0	1
15.	EDF Energy	P213_AR_15	9	0
16.	E.ON	P213_AR_16	0	0
17.	United Utilities Electricity Plc	P213_AR_17	1	0

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Jane Griffith</i>
Company Name:	<i>Central Networks</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>EMEB, MIDE Distribution</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>0</i>
Non Parties represented	
Role of Respondent	<i>Commercial Analyst</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	We do not believe the P213 proposal has any advantage over the P81 procedure in terms of accuracy of settlements as P81 makes settlements accurate if followed, there is a financial advantage to suppliers only.
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	As above.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	As above. There will be an impact on competition, but the net effect could well be neutral as the competition will now be on import/export packages rather than import and export separately, both scenarios are likely to result in benefit to the end consumer.

Q	Question	Response	Rationale
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	No	Our systems currently rely on the fact that the MPAN and registration details will be unique, one LLF, one MTC, one SSC, one PC etc to each MPAN, we cannot currently assign two sets of registration data to one MPAN. We would propose that an Import/Export MPAN is treated in a similar way to a normal two-rate LLF.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes	This is the easiest and 'cleanest' way to ensure that second MPANs are not left unregistered.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes	Approach described in the consultation document supported.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	Please see below

Q	Question	Response	Rationale
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	All software will need to be re-written to accommodate changes, new procedures developed and training provided, guidelines and written procedures/processes will need changing. All current P81 registrations will need to be moved across in accordance with the procedures developed. Approx cost of Systems IT updates: £120,000 Approx cost of testing, training and process updating: 80 man days, £17,600 Total: £137,600
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	No	
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 3	
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	No	The systems already receive that flow, it is the level of change to incorporate the altered tables into our other IT systems that concern us.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	

Q	Question	Response	Rationale
13.	Are there any further comments on P213 that you wish to make?	No	We are concerned that the cost to the industry is going to greatly outweigh any value added either through streamlined registration systems or a removal of administrative burden on suppliers. We would suggest that this matter is considered as part of or along side Project Isis which is likely to see significant changes to the structure of settlements data, thus removing the burden of making significant changes to our systems only to have to change them again with the advent of Project Isis rendering the cost of implementing these changes potentially impotent.

Question 7: other alternative solutions

A number of LLFs for NHH export have been established in MDD already with both MTC 867 for export only and MTC 870 for import/export, the SSCs themselves are import/export, and the meter type for import/export also already exists (see table below). Unfortunately these have been set up with only one TPR rather than two, therefore to date they have been used exclusively as export registrations. The EAC in MDD for these single-TPR combinations is currently set to zero.

Should the industry decide that it has a preference for having only one import/export MPAN, we would propose that either the issue of these SSCs having only one TPR is addressed, or new SSCs are assigned for the purpose of registering import/export meters and these are set up with two TPRs and used with MTC 870 in order to facilitate one import/export MPAN with two registers.

EACs can then be assigned to be appropriate for a microgeneration import/export consumption pattern (EAC for the first TPR being reflective of import of a site with microgeneration attached and EAC of the second TPR being reflective of the export of such a site) thus keeping settlement data accurate. This would allow a single MPAN to be registered under one LLFC, settlements and registration data can then be dealt with in a similar way to a two rate or RHT (flexible two-rate) meter, register 1 being import and register 2 being export. Alternatively, if it is decided to allow customers the choice of having one MPAN with one supplier or two MPANs with a choice of suppliers, those wishing to keep two MPANs can remain on the LLFC combinations currently set up for export with one TPR while those wishing to combine their import and export can be moved to the new LLFC assigned to the import/export SSCs with two TPRs.

The only change required (other than re-assigning TPR combinations in MDD if this route is chosen) would be for industry to create new SSC/TPR/EAC and LLFC/MCT/SSC combinations, an action which has limited cost and is part of normal operations.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment

Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Name: Jonah Anthony</i>
Company Name:	<i>The Micropower Council</i>
No. of BSC Parties Represented	
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>See below</i>
Non Parties represented	<i>The Micropower Council's membership is drawn from across the whole spectrum of stakeholders operating in the Micropower sector. This includes electricity and gas companies, manufacturers, trade associations, professional institutions, not-for-profit companies, non-government organisations, charities and private individuals, all of whom have a strong interest and expertise in the development of the micropower sector. A list of our members is available at http://www.micropower.co.uk/council/members.html</i>
Role of Respondent	<i>The Micropower Council provides the micropower industry's (including all low carbon micro heat and electricity technologies) main focal point for Government, regulators, Parliament and opinion formers on regulation and public policy issues affecting the production by consumers of their own sustainable heat and power.</i> <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state ¹)</i>
Does this response contain confidential information?	<i>NO</i>

Q	Question	Response	Rationale
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¹ Delete as appropriate – please do not use knockout, this is to make it easier to analyse the responses

<p>1.</p>	<p>Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	<p>Yes / No</p>	<p>It is ESSENTIAL that arrangements are introduced that reduce transaction costs for settling microgeneration otherwise there is a real risk that the development of this important market sector will be compromised. In addition, there is a significant risk that suppliers will see no benefit in registering the export from microgeneration and microgenerators will continue to spill to the system reducing the accuracy of settlement though the impact on the GSP Group Correction Factor.</p> <p>However, the Council is very concerned that the level of complexity that arises under an optional one MPAN/two MPAN approach could seriously compromise the benefits that could be achieved through lowering some of the transaction costs.</p> <p>The Micropower Council DISAGREES with the comment in 3.7 that by retaining the current P81 solution suppliers have the tools that are necessary to solve the settlement accuracy/GSP Group Correction Factor problems associated with increased unregistered generation as the incentives/costs are not aligned. The suppliers that benefit most will not necessarily be those that bear the cost as the costs of registration lie only with suppliers whose customers have microgeneration and the benefits accrue to all suppliers within a particular GSP Group in proportion to their customers' consumption within that Group.</p> <p>This consideration would also make it inappropriate for it to be mandatory for suppliers to register export.</p> <p>On balance, and subject to further information on the total costs of the changes, we believe that P213 will better facilitate the achievement of the Applicable BSC Objectives through:</p> <ul style="list-style-type: none"> • <i>reducing transaction costs associated with registering and collecting/processing data from meters recording the export from microgeneration; and</i> • <i>ensuring that the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome.</i> <p>However, because of the complexity issue noted above, we suggest that this conclusion only holds if total industry wide implementation costs are not excessive AND no other mechanism for achieving the reduction in transaction costs delivered by P213 (understood to be, primarily, agent charges) can be identified.</p>
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<p>2.</p>	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)</p>	<p>Yes / No</p>	<p>YES. We believe that this is a MUCH better solution as it should lead to lower transaction costs from reduced agent charges and through implementation of more efficient systems and processes with less complexity for suppliers and customers than the current solution and P213 Original.</p> <p>We believe that P213 will better facilitate the achievement of the Applicable BSC Objectives through:</p> <ul style="list-style-type: none"> • <i>reducing transaction costs associated with registering and collecting/processing data from meters recording the export from microgeneration;</i> • <i>streamlining processes and reducing the prospect of data errors occurring within settlement during the data collection and settlement processes; and</i> • <i>ensuring that the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome.</i> <p>As indicated within the Assessment Consultation - we also believe there has been reluctance to contemplate this solution because of concern that Ofgem would reject the approach because customers would lose the right to have a separate supplier for their import and export unless they install half hourly metering and that this would be <i>seen</i> to be reducing competition.</p> <p>However, removing the flexibility to have one or two MPANs does not reduce competition because there is little realistic prospect that suppliers would choose to offer separate import export tariffs that are more attractive than a combined import/export tariff - so it is a redundant option.</p> <p>In practice, removing an option that is unlikely to be used does not reduce flexibility or competition.</p>
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3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes/ No	<p>Yes.</p> <p>It is a simpler and more streamlined solution that would increase competition when compared to both the current and P213 solution.</p> <p>We do not believe that removing the option for customers to have a separate supplier for import and export would have a material adverse impact on competition because it is unlikely that suppliers will wish to offer more attractive tariffs under the dual MPAN route (at least not for the smaller customers). Whereas we do think that the additional complexity associated with the optional one MPAN/two MPAN solution could reduce the beneficial effects of P213 original.</p>
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes/No	<p>No view on this.</p> <p>However, we do not understand why the level of distribution losses should be anything other than equal and opposite for the import and export at a particular location at a particular time of day. Therefore, we are unclear why this is needed.</p>
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes/No	No comment

6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes / No	No comment
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes / No	No comment
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes / No	No comment

9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes/No	No comment
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	No comment
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	No comment
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	No comment
13.	Are there any further comments on P213 that you wish to make?	Yes / No	No comment

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Name Alex Pourcelot</i>
Company Name:	<i>UDMS</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>3</i>
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Party Agent / (NHHDA, HHDC and HHDA)</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	Objective D would not be better served by P213 as it does not offer a coherent approach to import/export sites in the NHH market. It would also depart from the already applied and well tested NHH and HH model of one MPAN for import and one MPAN for export.
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	/ No	Objective C and D would not be best served by Alternative P213. It would depart from the existing coherent process in NHH and HH markets and would not promote competition in micro-generation as the customer would not have the possibility to buy energy from one Supplier and sell excess energy to another. Alternative P213 totally goes against the Government’s and Industry’s drive to facilitate micro-generation.

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	/ No	Neither P213 nor its alternative serve BSC objectives C and D as mentioned in response to Q1 and Q2.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	/No	This is a complicated solution to fix the failing of alternative P213.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes/	
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes / No	We do not support P213 or its alternative
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

Q	Question	Response	Rationale
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	/ No	
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes/	
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2&Version 3	Version 2 for NHHDA, version 3 for HHDC and HHDA
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	As NHHDA is an Exelon system, we cannot respond to this question.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	Yes	P81 was implemented at the Industry's request. It offers an adequate treatment of Import/Export sites in the NHH market. P213 mostly impact on Central systems and no clear benefit can be gained by implementing this 300K change. No real risk to settlements were identified to justify the need for P213 or its alternative.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	Jonathan Perks
Company Name:	British Energy
No. of BSC Parties Represented	5
Parties Represented	British Energy Direct Ltd, British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd
No. of Non BSC Parties Represented (e.g. Agents)	-
Non Parties represented	-
Role of Respondent	Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	As previously stated in our response to the Initial Assessment Phase Consultation questions, British Energy are concerned that the new P213 process discourages competition (contrary to BSC objective C) and is not in the best interest of the customer. Implementing P213 would remove the option of registering the Import and Export MPANs separately with different Suppliers and therefore reduces consumer choice. The proposed arrangements for calculating profiled flow would introduce unnecessary complexity and potential for error. A preferable solution would be to continue the existing process but improve the compliance of participants.

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	As previously stated in our response to the Initial Assessment Phase Consultation questions, British Energy are concerned that the new P213 process discourages competition (contrary to BSC Objective C) and is not in the best interest of the customer. Implementing P213 alternative would remove the option of registering the Import and Export MPANs separately with different Suppliers and therefore reduces competition (contrary to BSC Objective C) and consumer choice to an even greater extent than P213 original. The proposed arrangements for calculating profiled flow would introduce unnecessary complexity and potential for error. A preferable solution would be to continue the existing process but improve the compliance of participants.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	As previously stated in our response to the Initial Assessment Phase Consultation questions, British Energy are concerned that the new P213 process discourages competition (contrary to BSC Objective C) and is not in the best interest of the customer. P213 alternative would remove the option of registering the Import and Export MPANs separately with different Suppliers altogether and therefore reduces consumer choice and is worse than P213 original.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	No	Without more transparency of the methodology for determining LLFs (and thereby the effective charge faced by Suppliers for distribution losses), how can we be sure that the LLFs will be appropriately calculated? In theory, the size of adjustment for microgenerator level export and import flows should be a mirror image of each other. We note that it is proposed that the D0030 flow will contain the substituted LLF Class Ids and that this is expected to reduce the changes to LDSO systems. Have the Modification Group considered that LLF Class Ids should also be included in the D0242 flow to simplify DuOS validation and as such this would further increase costs?

Q	Question	Response	Rationale
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	No	This proposed solution highlights the anti-competitive nature of P213. This solution removes the choice of Supplier and is not in the best interest of the customer.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	No	British Energy are of the opinion that P213 should not be approved. However, the number of system changes required and associated DTC changes indicate that the implementation period would need to be greater than 18 months.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	As previously stated in our response to the Initial Assessment Phase Consultation questions, British Energy of the opinion that it should be made compulsory for all Suppliers to follow the existing arrangements (introduced by P081).
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	Our original concerns have not been allayed. This will have a significant impact on our current processes and would require significant system changes as a result of changes to the DTC and flows.
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes/No	British Energy are of the opinion that the Change of Supplier process is out of scope for this modification and should be raised as a separate issue.

Q	Question	Response	Rationale
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	British Energy do not approve of the associated costs as a result of changes to the industry and systems.
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	British Energy do not approve of the associated costs as a result of changes to the industry and systems.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	Yes	<p>British Energy are not in favour of P213 or its alternative. We believe they would reduce competition in the sale to and purchase from customers of electricity by suppliers, contrary to BSC objective C, and they are not in the best interest of the customer. Currently, a customer can choose to register the Import and Export MPANs separately with different Suppliers. Implementing P213 would reduce this choice of Supplier, and P213 alternative would remove it altogether, thus reducing consumer choice.</p> <p>Having Import and Export on the same MPAN would distort Settlements and, to maintain the accuracy of Settlement, Import and Export should be recorded as separate MPANS. The proposed arrangements for calculating profiled flow would introduce unnecessary complexity and potential for error.</p> <p>It would seem more beneficial to use the current arrangements (introduced by P081) to register Export MPANs in Settlement and work towards accurate compliance of all participants with this process. This would appear to be a more cost affective approach.</p>

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	Andrew Latham
Company Name:	Centrica
No. of BSC Parties Represented	Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd
Parties Represented	9
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	Supplier
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Centrica believe that this modification will better facilitate competition in the micro-generation NHH market (particularly for domestic customers) in the long term. However, the proposed solution will have significant implementation costs with minimal returns forecast over the next 5 years. That said, it is acknowledged that the work underway in Europe and the UK may raise awareness (and therefore the take-up) of Micro-generation going forward.

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	Our preferred solution for Profile Classes 1 and 2 is P213. However, having considered solution in the non-domestic market, we have reached the conclusion that there is merit (particularly in minimising costs and customer impacts) in retaining the P81 model as optional. The current non-domestic thresholds could be applied and non-domestic Suppliers should be given the choice to use either P81 or P213.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	At this time with small amounts of customers connected this may be the correct way forward. We would like to see what the impact would be on the existing customers before removing this P81.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes	

Q	Question	Response	Rationale
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	No	Centrica cannot agree to a 12 month implementation approach. We are currently upgrading our non-domestic core billing system and have recently completed the upgrade of our domestic systems (which is currently going through a period of stabilisation). As such, we are unable to introduce these changes easily and at a reasonable cost. The non-domestic upgrade is not due to go live until Q1 2009. Therefore we would be looking for a minimum implementation time of 18 months.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	As pointed out in Q2 we believe consideration should be given to the option of a domestic / non-domestic threshold, whereby P81 can be utilised in the non-domestic sector.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes	Due to the short timescales for impact assessments and the disappointment around The Panel not allowing additional time for impact assessment we cannot give accurate figures for this modification. Therefore as an estimate for both British Gas Residential and British Gas Business we estimate £2M to upgrade systems and this has a caveat of plus or minus 50%. To give you an understanding of the work involved in this modification it is not just about the changes to IT systems. It also need to include new call routing, changes to processing/ procedures, changes to billing documents, changes to sales literature and pricing documents, Pertinacity to increase the EAC and AA performance if we do not use smart metering. We also identified a need to re-train our debt borough and field agents dealing with debt recovery.
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	As Q8

Q	Question	Response	Rationale
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 3	Version 3
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes	
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	Yes	Centrica is supportive of this modification and see synergies between Smart Metering and allowing customers to reduce their carbon foot-print allowing this modification to fit strategically. Financially however; it could not be justified with a straight forward business case and we see this a long term investment.

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Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Chris Welby</i>
Company Name:	<i>Good Energy</i>
No. of BSC Parties Represented	<i>1</i>
Parties Represented	
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	
Role of Respondent	<i>Supplier</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Will increase competition in microgeneration
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	Reduces competition. It will also make it harder to register & de-register the settlement register as Customers switch between tariffs based on export, and those based on generation (which require there to be no export). This could lead to additional costs.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	The option to have the export registered in settlements or not is a key requirement. The two MPAN option is therefore crucial.

Q	Question	Response	Rationale
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	For reasons specified in the document
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes	This will ensure control of the process
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes	It is already possible to register exports. This mod is about improving the process. Therefore it is sufficient to roll out in the next release after 1 year.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	To look at the 30kW value over which export must be HH metered. This figure should be reviewed by the Panel from time to time, but has not happened recently.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	Provided the alternative Mod is not approved.

Q	Question	Response	Rationale
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	No	
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	Not known
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	No	

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Cher Harris</i>
Company Name:	<i>Scottish & Southern Energy</i>
No. of BSC Parties Represented	<i>6</i>
Parties Represented	<i>SSE Energy Supply Ltd, SSE Generation Ltd, Keadby Generation Ltd, Medway Power Ltd, Southern Electric Power Distribution plc, Scottish Hydro-Electric Power Distribution Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>SSE Power Distribution Ltd</i>
Role of Respondent	<i>Supplier/Generator/ Party Agent / Distributor</i>
Does this response contain confidential information?	

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	<i>Yes/ No</i>	Existing process is fit for purpose and cost justified. Whilst we understand the reasoning behind the proposal, we do not think it should replace the existing process. However, we also consider that implementing 2 different processes to deal with microgen sites will be ineffective and uneconomic. It would add additional complexity and cost to amend both the central systems and Parties’ systems and procedures. It could also have an adverse impact on competition. As such, it would fail to meet Applicable Objectives (C) and (D).

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes No	<p>Whilst mandating the use of only one solution would be beneficial, we are not convinced that the solution proposed under P213 is 'better' than the existing P81 process. There is no evidence to suggest that the uptake of P213 will be any higher than P81. In fact, if P213 were made the only option for Settling microgeneration, it could potentially dissuade Parties who have already invested in the P81 solution from settling any microgen sites.</p> <p>Furthermore, it could be argued that mandating P213 would unfairly benefit those Parties who have failed to implement the existing arrangements (P81), and penalise those Parties who have already invested in P81, as they would have to unpick the changes they have already implemented, implement the new solution (P213) and then migrate any sites they already have set up under P81 arrangements.</p> <p>Competition in microgeneration is at its very early stages. Having the P213 solution as an option will allow the market to develop in whichever way gives the customer the best return. If this was the only option there would be no competition in export, only the existing competition in import. You could argue the same case for only having 1 ID for gas and electric as most customers opt for a dual fuel package.</p> <p>Therefore, the Alternative Modification would also fail to meet Applicable Objectives (C) and (D).</p>
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes No	<p>The Alternative Modification would remove the complexity of having to transfer customers between P81 and P213 and vice versa when there is a COS. This may help facilitate Applicable Objective (D) but the removal of competition in the export reward market would fail to meet Objective (C).</p>

Q	Question	Response	Rationale
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes/ No	The inclusion of separate LLFs will cause additional complexity to systems outside of the BSC control but would enable more accurate charging methods for the DNO. This would ensure that the site for DUOS purposes was charged the same regardless of whether it was settled under P81 or P213.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes/ No	The gaining Supplier must take responsibility for the process. It would not be appropriate for the gaining Supplier to be reliant on the losing Supplier carrying out certain actions before the Change of Supplier could complete.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes / No	We definitely require 12 months notice of implementation from Authority decision, however, it is not possible at this stage to say whether that would be best managed as a separate release, as it would depend on the extent of the changes to be implemented under the final solution, and also the number of other changes due to be implemented in the 'regular' release at that time.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes / No	Enforcing the mandatory registration of export meters under the existing P81 arrangements.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes / No	

Q	Question	Response	Rationale
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes/ No	We have concerns that customers may not provide the correct or complete details, or provide it in a timely manner. Equally, where Suppliers liaise directly with one another they may have difficulties getting through to the appropriate person in other Supplier organisations. However, we cannot see any other way of obtaining the data necessary for all Parties to complete the process.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	Version 3 of each flow.
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	It is likely that we would have to upgrade our systems to use the amended version 3.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	The scenarios provide a comprehensive picture of how the processes under P213 should work.
13.	Are there any further comments on P213 that you wish to make?	Yes / No	Existing process is fit for purpose and cost justified. We do not believe that there is necessarily a tangible benefit to the customer if the new P213 process is implemented. Indeed the high cost of implementation in the short term could possibly have a negative impact on export reward. The assertion that the cost of maintaining 2 MPANs is a barrier to settling export sites still needs to be challenged. In our experience, the vast majority of MOP contracts are based on transactional charges and DC/DR charges are generally based on meters read, not MPANs or individual meter registers.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Laura Doherty</i>
Company Name:	<i>Npower Limited</i>
No. of BSC Parties Represented	<i>10</i>
Parties Represented	<i>RWE Trading GmbH; RWE Npower Ltd; Npower Commercial Gas Ltd; Npower Cogen Trading Ltd; Npower Direct Ltd; Npower Ltd; Npower Northern Ltd; Npower Northern Supply Ltd; Npower Yorkshire Ltd; Npower Yorkshire Supply Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>None</i>
Non Parties represented	<i>N/A</i>
Role of Respondent	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	<p>Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives?</p> <p>Please give rationale and state objective(s)</p>	No	<p>We do not believe that Proposed Modification P213 better facilitates the achievement of the applicable BSC Objectives.</p> <p>BSC objective C seeks to better facilitate competition. Npower is of the opinion that the increased complexity and costs of Proposed Mod P213 would in fact hinder competition. The increased complexity of P213, over the current baseline, would complicate the customer transfer process and would create problems, and reduce benefits, for customers and the industry.</p> <p>BSC objective D seeks to improve efficiency. The optionality inherent in Proposed Mod P213 would result in increased costs and complexity and hence reduce the efficiency of the industry arrangements. P213 requires Suppliers to implement both P81 and P213, which would be extremely inefficient in our view. P213 is also likely to lead to increased data quality problems, which are highly manually intensive to resolve, and therefore are inefficient.</p>
2.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline?</p> <p>Please give rationale and state objective(s)</p>	No	<p>We do not believe that Alternative Modification P213 better facilitates the achievement of the applicable BSC objectives when compared to the current baseline. We believe there would be benefit in reviewing the current industry baseline to determine if it is fit for purpose or could be adapted to become so, as this could be a more efficient and cost-effective solution. Our experience of P81 has suggested that there are some issues with the process, but that these could be overcome in a more efficient and economic manner than the solution being proposed in P213 and Alternative Mod P213. We would be happy to provide further details of these issues to aid discussion in this area.</p> <p>Until the industry has had the opportunity to fully discuss the current baseline, how can we be confident that we will not just replicate any issues that may exist in the current baseline into a new solution?</p>

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	No	We refer you to our response to Q2 and suggest that we need to revisit P81 before making any further decisions. Our preference is for a solution with no optionality.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	No	Section 2.3.3 refers to new LLFCs whilst this question refers to separate LLFs – clarification is required as to which is the intended terminology as they have fundamentally different outcomes. If multiple LLFCs were needed on a Metering System (MPAN) this would require a fundamental change to many systems, including MPAS, and would also impact the top-line of an MPAN. This level of complexity is not an issue within the current industry baseline solution (P81). Given that the stated intention of P213 is to reduce complexity then this solution does not appear to achieve this objective.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes/No	Our interpretation of this question is that we are being asked to state whether we agree that the mechanism used to facilitate movement between a 1 and a 2 MPAN solution hinges upon the new Supplier having the capability to operate both the current industry baseline (P81) and the solution proposed in Mod Proposal P213. We do not believe that this is an efficient solution and believe it will create problems for all industry parties and the end customer. There is insufficient clarity regarding the transitional arrangements within the current documentation, which raises a number of issues that require further definition and analysis, such as the determination of energisation status and the risk of stranded MPANs.

Q	Question	Response	Rationale
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	No	As there is insufficient detail on a number of fundamental areas at present, we do not believe it is possible for the industry to make an informed decision on which implementation approach or period is most suitable.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	We do not believe that the current baseline (P81) has been adequately investigated. An industry consultation on the current baseline should be undertaken before deciding whether progressing the development of a new baseline is the most effective solution.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes	The additional information contained in the scenarios makes the complexity of Proposed Modification P213 more apparent, and this information has helped npower to make the decision that we must rule this proposal out completely. Even taking into account the provision of the process diagrams, there is still insufficient detail contained within the second consultation document on the benefit or viability of Alternative Modification P213. There are still a number of high-level issues requiring clarification, for example our query on LLFs/LLFCs noted in the response to Q4. Without this information, and comparative information on the current industry baseline, we are unable to make a fully informed assessment at this time.
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liasing through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	In our experience there is room for concern with any process where customer involvement is key. In general, individual customers may not always fully appreciate or understand the complexity inherent in the CoS process and the increased complexity with Domestic Microgeneration simply compounds this.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	Within our organisation both versions are used.

Q	Question	Response	Rationale
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	No	The issue of changing to Version 3 across the industry was raised earlier this year in a paper to SVG (SVG73/10) and a decision was taken to maintain both versions. P213 should not be used as a mechanism to facilitate the removal of version 2 when a business case has not been found for doing so.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	There is insufficient detail to fully answer this question. We would require lower level detail to fully assess the impacts. The comments and issues noted within the diagrams are all valid, and no doubt further issues will be identified when a fuller impact assessment is undertaken.
13.	Are there any further comments on P213 that you wish to make?	Yes	The current industry baseline allows customers to choose separate Suppliers for their Import and Export. Moving to a single MPAN solution removes this customer choice, which could be viewed as being anti-competitive, and we would welcome a determination from Ofgem on this issue before any further work is progressed. In addition, further clarity is needed in a number of areas eg the transitional arrangements, the impact of LLFC/LLF changes, and the risk of MPANs being assigned an incorrect energisation status and stranded MPANs.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Lisa Smith</i>
Company Name:	<i>Siemens Energy Services</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	<i>N/a</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>6</i>
Non Parties represented	<i>NHHDA, NHHDC, MO, MA, HHDC, HHDA</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Although our preference is that the industry continues to use the existing arrangement for microgeneration sites, we recognise that there are situations where a single mpan solution may be simpler. For example, where the import and export supplier are the same, the import and export meter operator are the same and the import and export asset providers are the same. A combined Import/Export Meter as a single box solution also lends itself to a single MPAN – but only when there is a single supplier involvement. However, for situations where there are different suppliers, MOAs and MAPs for the import and export meters, then the two mpan option is a simpler solution and therefore we would like to retain this option.

Q	Question	Response	Rationale
2.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)</p>	No	<p>A single MPAN solution can complicate the appointment of two different suppliers/ Meter Operators/ Asset Providers. Two MPANS will reduce possible errors where more than 1 supplier is involved.</p> <p>Where the solution moves to a single MPAN, the complexity of the metering can increase in terms of, the devices utilised, the logistics of distribution/ stock management and the complexity of the modifications required on site (some sites practically may require a 2 MPAN solution).</p>
3.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)</p>	No	See 2 Above
4.	<p>Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.</p>	Yes/No	
5.	<p>Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.</p>	Yes/No	Linked to 2. Our perception is that a single MPAN solution is only effective with a single supplier responsible for both Import and Export on the site.

Q	Question	Response	Rationale
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	No	We would support a 12-month implementation process, as time is required to implement process and system changes.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	As an independent service provider our concern is that the liaising process will be time consuming, result in incomplete information and lead to gaps in job instructions and data flows.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2	

Q	Question	Response	Rationale
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes	Our systems are currently configured to receive version 2 and therefore we would have to make a system change in order to receive version 3.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	

Q	Question	Response	Rationale
13.	Are there any further comments on P213 that you wish to make?	Yes	<p>Section 2.2 indicates that only one combined SSC code will be required for a combined MPAN. In practice dozens of combined Import/Export SSC codes will be required to cover the variety of existing 2 and 3 Rate Import SSC codes. An equivalent number of 1 Rate Export and 2/3 Rate Import SSC codes will be required to provide the details required for installing a meter with a combined Import/Export SSC Code</p> <p>We also have concerns over Data Collection Accuracy and indication of meter registration functionality if two meters are used on a single MPAN code. The Import meter can have 3 registers and the export meter 1 register – giving rise to a 4-register registration and read requirement.</p> <p>If a single meter with Import and Export functionality is installed under a single MPAN, consideration needs to be given as to who is responsible for maintaining and changing that meter if the site subsequently adopts a two MPAN approach - to accommodate different Import and Export Energy Suppliers. Who is responsible for the cost of maintaining the meter – the Import or the Export Supplier?</p> <p>We would suggest that significant market testing would need to be conducted to provide assurance that there would be no adverse impact on settlement.</p> <p>We are concerned that there is a potential for this change to incur significant costs to all market participants and would suggest that Elexon conduct further investigation into this.</p> <p>We would also like to raise the issue that standard metering solutions for all installations are not currently available.</p>

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Please send your responses by **17:00 on 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Stephen Johnson</i>
Company Name:	<i>Imserv</i>
No. of BSC Parties Represented	<i>0</i>
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>3</i>
Non Parties represented	<i>NHH DC, NHHDA, NHHMO</i>
Role of Respondent	<i>Party Agent</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes (c) & No (d)	We believe that the Proposed Modification better facilitates objective c) ie it will promote and encourage competition – but that it does not at all facilitate objective d) ie it makes the whole process much more difficult to administer
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes (d) & No (c)	We believe that removal of the P81 solution will move towards better facilitating objective d) ie it will make the whole process much simpler to administer – but it will not better facilitate objective c) as it will remove the ability of a customer to contract with different parties for his import and his export ie reduce competition
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	On balance, the Alternative Mod would make this whole process potentially workable – as the number of combinations of setups moving from P81 to P213, vice versa, no export settled to P213, vice versa etc would be significantly reduced and much more feasible to administer and operate

Q	Question	Response	Rationale
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	The LLFs are inherently going to be different for Export to Import and so it seems obvious that we should include the facility to allow them to be different – there is nothing forcing Distributors to declare different values if they don't feel the need to or cannot accurately calculate them
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes & No	The general industry process is for the "New" Supplier / Agent to be responsible on a change rather than the "old" Supplier / Agent – so this is consistent with the other processes. However this does mean that a Supplier has to be able to register and operate under the "P81 solution" for a while before he then moves to the "P213 solution" and removes the second MPAN. This means that Suppliers will need to be able to cater for both P81 and P213 solutions – which might restrict the usage of P213 for some of the reasons that P81 is not used now.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Either	We are easy with either of these approaches
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

Q	Question	Response	Rationale
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes	As an agent we are now much more concerned about the complexity involved and the potential for us to “not know what is going on”.... Suppliers seem to find it hard enough to cope with the current suite of SSCs and their validity with some PCs and in some GSP Groups – so to significantly increase the valid set of SSCs and the complication of tying in read history changes across MPANs etc will, in our view, undoubtedly lead to a deterioration in the quality of data in the agent systems and lead to increasing confusion and complication. We do not have a way of quantifying this as the financial impact will not necessarily be on ourselves but on the Suppliers.
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Some	The obvious concern about customers and industry terminology – we have difficulty now trying to get customers to quote MPANs rather than Account Numbers. On the other hand, someone who has taken the trouble to install generation capacity and be involved in this market will probably have more of a clue about what is going on, so these may not be “average” customers that we deal with.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2	
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes	We would have to – and version 3 is the way to go longer term anyway, so this would presumably be a good trigger
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	

Q	Question	Response	Rationale
13.	Are there any further comments on P213 that you wish to make?	No	

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Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	Alastair Barnsley
Company Name:	E.ON UK Energy Services Limited.
No. of BSC Parties Represented	0
Parties Represented	
No. of Non BSC Parties Represented (e.g. Agents)	1
Non Parties represented	E.ON UK Energy Services
Role of Respondent	Party Agent
Does this response contain confidential information?	No

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We believe that the modification would better facilitate the achievement of the Applicable BSC Objectives compared to the current baseline. There are already a number of properties that suppliers have only registered one MPAN for sites with the potential for import & export. This modification would help to accurately set up these accounts without forcing suppliers to register additional MPANs. It would also make the identification of Import/Export metering sites easier.
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	Maintaining both options does not reduce complexity of settlements. In addition as P213 was requested due to issues with P81 process the retention of the P81 process will not eliminate those problems.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	no	We support the alternate solution.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes	
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

Q	Question	Response	Rationale
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	BAU process would be no change to original. However a wash-up of existing P81 scenarios would be an additional one-off work list
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	Minor concerns around possible objections which may involve processing issues for DC's. Concern over COS process: P81 – P213 (5) – This states that new supplier acquires both MPANs, and then states that the Old Supplier disconnects the old MPAN. 1) The two statements aren't compatible? 2) How does the old supplier know which MPAN?
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 3	
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	N/A we currently use version 3
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	No	

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Chris Carberry</i>
Company Name:	<i>Scottish Power Ltd</i>
No. of BSC Parties Represented	<i>7</i>
Parties Represented	Scottish Power UK Ltd, ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Transmission Ltd, SP Manweb Ltd, SP Distribution Ltd
No. of Non BSC Parties Represented (e.g. Agents)	<i>2</i>
Non Parties represented	SP Dataserve UK Ltd
Role of Respondent	Supplier/Generator/ Trader / Party Agent
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	<p>Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	No	<p>Proposed Modification P213 would at best do nothing to improve the facilitation of objectives (c) and (d), but more likely result in a more complex set of arrangements introducing an unacceptable level of error into the Settlements process. Given the increased level of complexity it seems unlikely that competition will be increased or that processes will be more efficient.</p> <p>If we refer to the 'Justification for Change' section on the Modification Proposal there are three reasons given:</p> <ol style="list-style-type: none"> 1. <i>Reduce transaction costs associated with registering and collecting/processing data from meters recording export from microgeneration</i> <p>What are these costs and by how much will P213 reduce them? There is no analysis in the Assessment of what these costs might be. If we are to justify an implementation cost of around £300k we need evidence that it will be recouped.</p> <ol style="list-style-type: none"> 2. <i>Ensure that the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome.</i> <p>Maintaining the status quo is not a justification for change. This provides no benefit to the BSC and cannot be seen as a justification for P213.</p> <ol style="list-style-type: none"> 3. <i>The streamlining of processes associated with the collection and processing of data from microgeneration will reduce the potential for errors to occur leading to improved efficiency in the implementation and administration of the balancing and settlement arrangements.</i> <p>It is clear from the Assessment that this has not been achieved, as the processes proposed are vastly more complex than the status quo.</p> <p>It is disappointing that the group are unable to recognise that P81 already presents an unacceptably high risk of error (in terms of estimation via profiling) and that P213 will only succeed in exacerbating this (ref 3.2.1.4 of the consultation document).</p> <p>It appears that P213 may now be perceived as an exercise in shoe-horning a single MPAN solution into the present import-based arrangements, instead of using the opportunity to resolve some of the imperfections of P81 whilst introducing the option of a simpler, single-MPAN process.</p>

Q	Question	Response	Rationale
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	No	While the alternative Mod would address the complexities of converting dual MPANs into single MPANs and vice versa it does not alter the responses the points made under 'justification for change'. We have no cost/benefit analysis to justify the cost of implementation, there is no benefit under profiling and there is no evidence that there would be a reduction in error.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	While the alternative is less complex than the proposed it is still fails to better facilitate the achievement of the Applicable BSC Objectives against the baseline. Although we have sympathy for wanting a single solution we believe that the existing arrangements under P81 offers less complexity and lower costs than P213. We remain supportive of providing customers with the option of a single MPAN solution, but the present lack of an acceptable and proven means of accurately estimating export and import consumption via profiling must be addressed.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	This will more accurately reflect the losses impact (and savings) of microgeneration in the distribution network.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes	Under a single MPAN solution the appointed Supplier must be responsible for both import and export. However the complexity illustrated by the process documents serves to underline the increased risk to participants.

Q	Question	Response	Rationale
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12-month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes (support normal release schedule)	There is no clear justification in supporting the additional cost of a separate release. Any action including the implementation of a change needs to be in the interest of consumers. While it is understandable that there may be an instinctive reaction to implement early and in light of the importance of the Climate Change Sustainability Act, it is not in the interest of consumers to bear the brunt of this additional cost for a 1-3 month timing benefit.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	<p>ScottishPower supports the principle of providing customers with the option of a single MPAN solution for import/export sites, but does not approve of shoehorning a single MPAN solution into the present import-based arrangements. Instead P213 should have provided the market with an opportunity to resolve some of the imperfections of P81 whilst introducing an accurate and robust, single-MPAN process. However ScottishPower believe that only a completely new Modification could achieve this.</p> <p>A new Modification would investigate the level of risk to Settlements of estimating export and import for sites with differing micro-generating technologies and under different meteorological and operating conditions. The present Modification does not do this and would potentially exacerbate the level of erroneous estimated consumption and export into Settlements.</p> <p>A new Modification would also explore an option based on HH-style data in the NHH Market. This would not require HH-style meters but instead latest AMR Meters (possibly SMART) that would allow us to accurately allocated consumption to the correct HH period, possibly using the established settlement processes for Measurement Class E or MOST-metering.</p>

Q	Question	Response	Rationale
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes	The additional information provided has made it increasingly clear that the impact on settlement is considerable, both in complexity and settlement inaccuracy. Although the process maps are useful they do not answer the points made in our previous consultation response. As such the risk to the accuracy of settlement data (and specifically that for new entrants into the import/export market) remains significant.
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	One should expect that there may be issues with an industry process when the key participant resides out with the BSC. It is also unrealistic to expect customers to effectively relay details such as MPAN's and SSC's. Customers would not unreasonably expect their Supplier to manage this on their behalf.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Both Version 2 & Version 3	ScottishPower currently utilises both versions of both MDD flows (i.e. V002 and V003 of both D0269 and D0270), as different systems use different versions.
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	No	We recommend that any change should be applied to both versions 2 and 3.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes	It would seem more reasonable and practical that the gaining Supplier should not be reliant on the losing Supplier to transfer the customers metering status. There is a real hazard that the old Supplier could be disconnecting MPANs when they should not be or indeed remaining Supplier for sites they believe were lost. Instead Suppliers should be able to gain both types (single and dual MPAN) and then convert at their leisure. There is no clear incentive for the losing supplier to be involved in the process of changing the customers metering status after they have lost Supply.

Q	Question	Response	Rationale
13.	Are there any further comments on P213 that you wish to make?	Yes	We would like to reiterate the point made from our previous consultation response regarding data quality in the hope that the Mod Group provides an answer. P213 provides no assurance around the quality of data and fails to put in place any forms of validation for the consumption on both import and export registers. Any over-recording of export data will have a significantly detrimental effect on other Suppliers in the GSP via GCF and as such should be avoided via clear validation criteria.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Graham Smith</i>
Company Name:	<i>Western Power Distribution</i>
No. of BSC Parties Represented	<i>2</i>
Parties Represented	<i>Western Power Distribution (South Wales) Ltd; Western Power Distribution (South West) Ltd</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>Western Power Distribution Metering</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state ¹)</i>
Does this response contain confidential information?	<i>No</i>

¹ Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
1.	<p>Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	Yes	<p>Objective C. There are very few NHH export sites currently registered under P081. We agree with the proposer that a possible cause for the low numbers is that the current 2 MPAN solution adds an administrative cost that may outweighs the benefits of registering the export. Giving suppliers the option to register both import & export on a single MPAN provides an opportunity for these costs to be reduced and would make it more likely that export would be registered thus increasing competition.</p> <p>Objective D. Registration of a single MPAN for import & export is more efficient than registering two. However, there will be a significant adverse impact on Meter Operators who will be required to deal with increased numbers of SSCs. Overall, the benefits of using a single MPAN are likely to outweigh the additional complications in managing the data substitution table and the additional number of SSCs that are required.</p>
2.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)</p>	Yes	<p>Objective C. There are very few NHH export sites currently registered under P081. We agree with the proposer that a possible cause for the low numbers is that the current 2 MPAN solution adds an administrative cost that may outweighs the benefits of registering the export. Giving suppliers the option to register both import & export on a single MPAN provides an opportunity for these costs to be reduced and would make it more likely that export would be registered thus increasing competition.</p> <p>Objective D. Registration of a single MPAN for import & export is more efficient than registering two. However, there will be a significant adverse impact on Meter Operators who will be required to deal with increased numbers of SSCs. Overall, the benefits of using a single MPAN are likely to outweigh the additional complications in managing the data substitution table and the additional number of SSCs that are required. In addition, removing the two MPAN solution will mean that participants only need to support one process and it will remove the need to introduce highly complex scenarios to transfer metering systems between the two registration methods.</p>

3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	Objective D. Operating two solutions for registration of NHH export may lead to difficulties dealing with the complex arrangements for transferring systems between the P081 and P213 solutions. It will be more efficient to only have the P213 solution.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes	It is vital that LDSOs retain the ability to specify separate LLFCs for the Import and Export. Removing this facility would give potential for a loss in accuracy of the line loss factors applied leading to less accuracy in settlements. Extending the concept of the substitution table to incorporate LLFCs should not require an alternative modification so we agree with the decision to include this within the scope of the original modification.
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes	It is logical that, for any given settlement day, a single Supplier is responsible for managing the MPAN or MPANS that relate to a single import/export service. Requiring the gaining Supplier to register both MPANs, and then dispose of one if they see fit to do so, means that other market participants and customers only need to deal with one supplier.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale		We support implementation in the first available release that is at least 12 months after the Authority decision. We don't see any need for a separate release for this modification. The maximum benefit a separate release could deliver is that the new arrangements could be implemented 3 months or so earlier than would otherwise be the case. This early adoption is unlikely to lead to enough environmental benefits to justify the cost of a separate release.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	

8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	We do not consider it appropriate to place reliance on the customer. The process should be simple and seamless from their perspective otherwise it will act as a deterrent to change of supply and hinder competition. It is up to the industry to develop processes that will transfer the required information between participants as necessary, without having to rely on the customer for help. In many cases a change of tenancy will be the trigger for a change of supply and the new customer may not be aware of the existing arrangements so will not be able to help anyway. The industry should re-examine the process and redevelop this aspect of it.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	We currently use both versions. However, we only use version 002 to update our SMRS system. As SMRS also supports MDD V003 we could switch to using only version 03 quite simply.
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes	Where we currently load version 3 we will, if that flow version is amended, need to make changes to accommodate the new flow.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13	Are there any further comments on P213 that you wish to make?	Yes	See below

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION

Proposed P213 and the alternate could both lead to a massive increase in the number of SSCs in use. This could result in increased instances of wrong SSCs being selected leading to a deterioration in the accuracy of settlement data.

There are 19 SSCs currently available for use when registering NHH export.

Standard Settlement Configuration	
Standard Settlement Configuration Id	Standard Settlement Configuration Desc
0482	Micro-PV Export Import Profile Class 1
0483	Micro-PV Export Import Profile Class 2
0484	Micro-PV Export Import Profile Class 3
0485	Micro-PV Export Import Profile Class 4
0486	Micro-PV Export Import Profile Class 5
0487	Micro-PV Export Import Profile Class 6
0488	Micro-PV Export Import Profile Class 7
0489	Micro-PV Export Import Profile Class 8
0490	Micro-CHP Export Import Profile Class 1
0491	Micro-CHP Export Import Profile Class 2
0492	Micro-CHP Export Import Profile Class 3
0493	Micro-CHP Export Import Profile Class 4
0494	Micro-CHP Export Import Profile Class 5
0495	Micro-CHP Export Import Profile Class 6
0496	Micro-CHP Export Import Profile Class 7
0497	Micro-CHP Export Import Profile Class 8
0498	Other Sml Export SSC any import Profile
0940	NHH Export Hydro Profile Class
0941	NHH Export Wind Profile Class

Each of the above could need to be paired with a large number of valid import SSCs requiring the issue of a new "import/export" SSC.

As illustrated below WPD MOp currently supports 38 Import SSCs in the South West GSP Group that could be paired and in this GSP Group alone there is a potential need for 275 additional "special" SSCs to be issued.

Valid Import and Export SSC Combinations (S West GSP Group)

Y = potential for SSC to be paired with an export SSC

	Source >	PV								Micro CHP								Oth	Hydro	Wind
	Profile Class >	1	2	3	4	5	6	7	8	1	2	3	4	5	6	7	8	Any	Any	Any
	Export SSC >	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	940	941
SSC	Desc																			
127	1MD3R					Y	Y	Y	Y					Y	Y	Y	Y	Y	Y	Y
128	3 Rate Seasonal		Y		Y						Y		Y					Y	Y	Y
135	1MD4R					Y	Y	Y	Y					Y	Y	Y	Y	Y	Y	Y
154	E7 COM		Y		Y						Y		Y					Y	Y	Y
154	1MD2R7H					Y	Y	Y	Y					Y	Y	Y	Y	Y	Y	Y
176	E7		Y		Y						Y		Y					Y	Y	Y

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177	E7		Y	Y						Y	Y					Y	Y	Y
178	E7		Y	Y						Y	Y					Y	Y	Y
179	E7		Y	Y						Y	Y					Y	Y	Y
180	E7		Y	Y						Y	Y					Y	Y	Y
181	E7		Y	Y						Y	Y					Y	Y	Y
182	E7		Y	Y						Y	Y					Y	Y	Y
183	E7		Y	Y						Y	Y					Y	Y	Y
184	E7		Y	Y						Y	Y					Y	Y	Y
185	E7		Y	Y						Y	Y					Y	Y	Y
186	E7		Y	Y						Y	Y					Y	Y	Y
244	E7		Y	Y						Y	Y					Y	Y	Y
246	E7 D&N (3R)		Y	Y						Y	Y					Y	Y	Y
261	White Mtr (8hr)		Y	Y						Y	Y					Y	Y	Y
319	Evening/Wkend		Y	Y						Y	Y					Y	Y	Y
334	3 Rate Heating		Y	Y						Y	Y					Y	Y	Y
342	3 Rate Seasonal		Y	Y						Y	Y					Y	Y	Y
343	3 Rate Heating		Y	Y						Y	Y					Y	Y	Y
344	E7 D&N (3R)		Y	Y						Y	Y					Y	Y	Y
345	E7 D&N (3R)		Y	Y						Y	Y					Y	Y	Y
393	Credit (& Block)	Y		Y						Y	Y					Y	Y	Y
393	1MD1R				Y	Y	Y	Y					Y	Y	Y	Y	Y	Y
427	White Mtr (8 hr)		Y	Y						Y	Y					Y	Y	Y
432	E7		Y	Y						Y	Y					Y	Y	Y
435	3 Rate Heating		Y	Y						Y	Y					Y	Y	Y
436	3 Rate Seasonal		Y	Y						Y	Y					Y	Y	Y
935	ECONOMY 107		Y	Y						Y	Y					Y	Y	Y
942	E7		Y	Y						Y	Y					Y	Y	Y
943	E7		Y	Y						Y	Y					Y	Y	Y
944	E7		Y	Y						Y	Y					Y	Y	Y
945	E7		Y	Y						Y	Y					Y	Y	Y
946	E7		Y	Y						Y	Y					Y	Y	Y

Note.

Assume Key meters would not have export.

It is assumed all 2 rates are profiles 2 or 4. Some (eg 319) may be 1 or 3. The total count is not affected.

Restricted hours metering would not have export.

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This huge increase in the numbers of SSCs will increase the potential for an incorrect SSC to be specified by a Supplier, when it instructs the MOp to fit a new meter. In cases where the MOp fits meters under the terms of a contract and informs the Supplier of the SSC it used, (rather than receiving a specific instruction from the Supplier), the risk of an incorrect SSC being picked is also increased. There are also difficulties in loading so many valid SSCs on to MOp systems and metering hand held units, and needing the support staff and field operatives to have to scroll through hundreds of codes looking for the correct one to use.

Although P213 offers a clever way of substituting correct SSCs to replace a "special" code used in registration, we have concerns about how practical the solution is, unless the number of "special" SSCs can be limited in some way. We recommend that Parties and Party Agents are consulted on this specific point.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Paul Pitchford</i>
Company Name:	<i>AccuRead Ltd</i>
No. of BSC Parties Represented	
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	<i>1</i>
Non Parties represented	<i>AccuRead Ltd</i>
Role of Respondent	<i>NHHDC / NHHDA</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	We believe that P213 would better achieve BSC Objectives as it would ensure smoother transfer between parties for import/export metering systems.
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes	We further believe that the alternative solution would better facilitate the achievement of the Applicable BSC Objectives as it would avoid further confusion as to whether a metering system needs to be transferred as part of a single or double mpans import/export system.
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes	As it removes the option of methods for using import/export mpans, it will also remove the ambiguity in transferring data from agent to agent etc.

Q	Question	Response	Rationale
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes/No	No Opinion
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	No	As we agree with the alternative solution as a better solution then we do not agree with this principle. Though if the proposed solution is the solution to go forward then we would agree with this principle as to ensure an easier and more routine transfer of one mpan to two mpan systems.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes / No	We support the 12 month implementation period as due to the small number of sites currently engaged in using import/export metering then a rush to implement these changes would not create as much benefit as implementation at an appropriate pace for the market.
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	The two proposed solutions cover most issues possible for import/export metering. Only one extreme solution has not been presented and that is to have many new SSC values put into MDD, each with its own equivalent PC and LLF combination in the substitution table.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	No	These options had been considered previously and that is why we are still of the opinion that the alternative solution is the better way forward.

Q	Question	Response	Rationale
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes	Again, our concern here is that using the proposed solution will introduce room for error while the alternative solution will ensure that usual business practice is used to allow a smooth transfer of data.
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2	D0269002
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	No	Unless the new SSC values were left out of version 2 then we would not amend our systems. We would not see the benefit from this amendment if we were to only miss out on the substitution table.
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	No Opinion
13.	Are there any further comments on P213 that you wish to make?	No	No Opinion

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Rosie McGlynn</i>
Company Name:	<i>EDF Energy</i>
No. of BSC Parties Represented	9
Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seeboard Energy Limited
No. of Non BSC Parties Represented (e.g. Agents)	0
Non Parties represented	N/A
Role of Respondent	Supplier/Generator/Trader/Distributor
Does this response contain confidential information?	

Q	Question	Response	Rationale
1.	<p>Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives?</p> <p>Please give rationale and state objective(s)</p>	No	<p>At face value a single MPAN solution would seem to offer benefits of simplicity to the industry. However, it actually adds a further level of complexity that impacts not just on export metering but also with regard to import side of the customer premise. It also means that three different solutions, not the two suggested, will be available to Suppliers all optional. There are two already available; one to settle export MPAN and a second solution which is to choose not to settle. The Proposed Modification will not better facilitate the BSC objectives and is not an improvement on the current baseline. P213 will make operations more expensive and minimise the incentives for Suppliers to promote Microgeneration.</p> <p>A single MPAN solution requires a compromise with respect to using SSCs in the market. Section 2.2.1 suggests that a single SSC of 0666 can be used to imply that import is a 0393 and export is a 0482. Currently we have 17 different export SSCs in MDD, of these we believe that 13 could be used in combination with an import SSC of 0393 and so 13 new SSCs would be required for a single MPAN solution for an import SSC of 0393. If not, settlement of the export part of a single MPAN will be compromised which then introduces more risks to settlement. It becomes more of an issue when E7 SSCs are considered. It will become much more important with the advent of smart metering to know exactly how a meter is configured in terms of restricted hours and this does not seem to be possible for a single MPAN import/export future. In terms of how the future is to look we believe that ensuring smart metering works effectively is significantly more important than the perceived but unproved problems of a two MPAN import/export solution. We have assessed the impact of a single MPAN solution and believe that over 3000 new SSCs are required in MDD for this approach to work in the current market conditions. This can be reduced but only by preventing Microgeneration for customers with</p>

Q	Question	Response	Rationale
			<p>certain types of import SSC, however this would stifle competition.</p> <p>Responses to the first consultation on this proposal indicated that there are less than 1000 export meters currently in existence. To introduce potentially radical changes at this stage is unwarranted as well as having the potential to have significantly negative effects on settlement. The problem is not one of complexity with a two MPAN solution it is that the volumes of NHH import export sites is so low as to not make it cost effective to make significant investment in system changes to enable these to be settled.</p> <p>The transactional costs referred to in section 4.1 of the consultation are minimal in comparison with the central and individual costs P213 will impose on the industry.</p>
2.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline?</p> <p>Please give rationale and state objective(s)</p>	No	<p>This option suffers from same problems as mentioned above although would reduce the number of potential options available to suppliers. However, we feel that a two MPAN solution provides better facilitation of BSC objectives than a single MPAN solution. The two MPAN solution does not mask data required by Suppliers, particularly in terms of fully understanding the import requirements of an MPAN. It also ensures that a current complex area in terms of SSCs is not made significantly more difficult and potentially more error prone. The risk to settlement of introducing a series of new SSCs is a bigger risk than seemingly insignificant improvements to settlements and BSC objectives under this modification.</p>
3.	<p>Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC</p>	Yes	<p>However, it will not better facilitate the objectives than the current solution as detailed above. We strongly believe that these two modifications have no benefit and that it is only levels of export</p>

Q	Question	Response	Rationale
	<p>Objectives when compared to the Proposed Modification?</p> <p>Please give rationale and state objective(s)</p>		<p>penetration that are preventing current solution being used and export settled.</p> <p>This is the main barrier to registering Microgeneration in settlements not the process itself. We also do not believe that any solution which introduces more complexity into the use and understanding of SSCs can be classed as a pragmatic solution. This data is fundamental to settling correctly and having a solution that potentially masks import being fully understood cannot be justified as one which reduces risks to settlement.</p>
4.	<p>Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)?</p> <p>Please give rationale.</p>	Yes	<p>As this ensures flexibility to manage losses correctly for import and export.</p>
5.	<p>Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only.</p> <p>Please give rationale.</p>	No	<p>It adds a totally unnecessary additional complication to the trading arrangements. Whenever a customer moves Suppliers, they could decide to move from one scenario to another leading to increased risks for no perceived benefit.</p>

Q	Question	Response	Rationale
6.	<p>Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)?</p> <p>Please give rationale</p>	No	<p>We do not support the implementation of P213 as the costs of this modification far exceed any perceived benefit. Changes to our systems to take account of all the possible options available would be significant and we do not see how this could be implemented in less than two years. Industry should continue to invest effort in future areas such as smart metering that are likely to be key in any climate change efforts and a solution for these that would bring benefit under the BSC objectives.</p>
7.	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered?</p> <p>Please give rationale</p>	Yes	<p>It could be argued that making P81 solution mandatory would resolve all of the problems identified. It would also have the benefit of meaning one solution is used and does not rely on making changes to MDD, SVAA and any other central system. It also ensures that customers have competition on both import and export and ensures parties are aware fully of the import for a customer and therefore, their potential usage of energy. This makes decisions on energy purchases easier to make and should minimise risk of imbalance for Suppliers. We would, however, need a significant lead time to make this happen but we do believe that this solution provides more benefit to competition in generation and supply than a single MPAN solution and as such is much better at facilitating BSC objective (c). Given that this also does not require significant changes to any other data we also feel that this solution would better facilitate BSC objective (d) than any solution considered under P213.</p> <p>The modification group did discuss this option but it was defined as being out of scope of the modification. This is questionable as the alternative modification is directly linked to P081.</p>

Q	Question	Response	Rationale
8.	<p>As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed?</p> <p>Please give rationale and provide indicative monetary figures where possible</p>	No	<p>These diagrams are all process based and do not give any indication into the significant costs of this change. The central implementation costs combined with the significant system investments suppliers will have to make to take into account either the proposed or alternative modification, places significant cost burdens on the industry. These costs will not be ameliorated by the perceived benefits of the modifications.</p> <p>The consultation document (3.6) refers to a group discussion about whether or not P213 is regarded as an “interim solution” however it is not clear that the group came to an agreed position on this issue. In terms of efficiency it is illogical to implement P213 in the next year or so only to have to review and revise the process once there are significant volumes of NHH Export in the market.</p>
9.	<p>The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?</p>	Yes	<p>We can see that the change of supplier process becomes significantly more complex if P213 is introduced. The modification group have highlighted this process as highly complex however it is not clear how this complexity will be managed.</p> <p>The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows.</p>
10.	<p>Which versions of the D0269 and D0270 do you use?</p>	Version 2/ Version 3	<p>We use both versions</p>
11.	<p>It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow?</p>	Yes	<p>If such a change is made both versions 2 and 3 would need to be removed. If this was not the case then no one would be able to resolve settlement issues which are forced on parties by a single MPAN solution.</p>

Q	Question	Response	Rationale
	Please give rationale		
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	No	
13.	Are there any further comments on P213 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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P213 SECOND ASSESSMENT PROCEDURE CONSULTATION 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.

Respondent:	<i>Name: Colette Baldwin</i>
Company Name:	<i>E.ON</i>
No. of BSC Parties Represented	
Parties Represented	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non BSC Parties Represented (e.g. Agents)	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state ¹)</i>
Does this response contain confidential information?	<i>No</i>

Q	Question	Response	Rationale
1.	Do you believe Proposed Modification P213 would better facilitate the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	Yes, this modification better facilitates Applicable BSC Objective D by reducing the supplier/agent costs in managing export which should encourage more exporting sites to be registered in settlement. It will facilitate Objective C by encouraging suppliers to offer terms which are more favourable to customers by recovering the economic value of the energy exported.
2.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the current baseline? Please give rationale and state objective(s)	Yes / No	Yes, this further facilitates Objective C by removing the complexities of change processes which burden the market with costs to support options that the market does not intend to offer. Objective D is facilitated by the ability to offer a cost reflective product that will encourage suppliers to enter the exported energy into the settlement processes, thereby improving settlement accuracy.

¹ Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
3.	Do you believe Alternative Modification P213 (removal of two MPAN P81 solution) would better facilitate the achievement of the Applicable BSC Objectives when compared to the Proposed Modification? Please give rationale and state objective(s)	Yes/ No	The alternative proposal better facilitates the Objective C by removing the need for complex processes to move between P81 and P213 solutions to protect completely open competition which the market is not looking for at this time.
4.	Do you agree with the Group's inclusion in the solution for the capability of separate LLFs to be applied (within Central Systems) to the Import and Export on a single Import/Export MPAN (Section 2.3.3 of the consultation document)? Please give rationale.	Yes/ No	
5.	Do you agree with the principle underpinning the settlement process scenarios (to allow for movement between one and two MPANs to settle NHH export – section 3.2.1 and Appendix 4) that the new Supplier should be responsible for the Export MPAN if they wish to move to a single MPAN solution? Note this is for the Proposed solution only. Please give rationale.	Yes/ No	There is greater risk in leaving the old supplier with the MPAN before migration which is minimised by making the new supplier responsible. However, this is burdening the new supplier with costs.
6.	Do you support the implementation approach described in the consultation document or do you support a separate release approach based on a 12 month implementation period from the Authority's decision (due to the importance of the Climate Change Sustainability Act)? Please give rationale	Yes / No	This is high on the Government's agenda and a release 12 months from authority decision would demonstrate our desire to fulfil the obligations of the Climate Change & Sustainable Energy Act 2006. At the same time it must be remembered that the Secretary of State has powers to impose a solution should suppliers not offer export reward tariffs to customers by August 2009

Q	Question	Response	Rationale
7.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes / No	We should consider a P81 solution for non-domestic higher voltage generation scheme that are above G83/1, but do not require generator licences. As the market matures and more SME/Non-domestic scale generation is connected that falls below the requirements for a generator licence, competition in export is more appropriate. It is unlikely that domestic level export reward options will ever be offered unlinked to an import contract.
8.	As a result of the additional information included in the consultation document (particularly the process diagrams in Appendix 4) has the impact of P213 on your organisation changed? Please give rationale and provide indicative monetary figures where possible	Yes / No	
9.	The proposed process for Change of Supplier is based on information from the customer and the new and old Suppliers liaising through the customer. Do you have any concerns with this approach and/or suggestions?	Yes/ No	The customer may not always have the fullest information, particularly if they are not the party who installed the generating equipment
10.	The P213 solution would require a change to the D0269 and D0270 MDD data flows, although P213 may not seek to change both versions of each of these flows. Which versions of the D0269 and D0270 do you use?	Version 2/ Version 3	Version 3
11.	It is suggested that P213 will only seek to update Version 3 of the D0269 and D0270. If P213 was implemented on just version 3 would you amend your systems to receive that flow? Please give rationale	Yes / No	Yes, we would have to amend our systems to accommodate changes to version 3
12.	Does P213 raise any issues, in particular with scenarios and assumptions in Section 3.2.1/Appendix 4, that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure? Please give rationale	Yes / No	

Q	Question	Response	Rationale
13.	Are there any further comments on P213 that you wish to make?	Yes / No	LLFC Substitution table is over-engineering a solution that limited number of industry parties who would require the data, other media mechanisms could be used, such as the web or a disc.

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **17:00 on Wednesday 18 July 2007** to modification.consultations@elexon.co.uk and please entitle your email '**P213 Assessment Consultation**'. The Modification Group is meeting to discuss your consultation responses on Friday 20 July, so 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 should be addressed to Ysanne Hills on 020 7380 4162, email address ysanne.hills@elexon.co.uk.

United Utilities Electricity Plc (UUE) believes that Alternative P213 does not meet the BSC objectives due to the following impacts;

(a) *The efficient discharge by the licensee [i.e. the Transmission Company] of the obligations imposed upon it by this licence [i.e. the Transmission Licence];*

- P81 already achieves this objective; introducing alternative P213 would not make any changes to the current obligations.

(b) *The efficient, economic and co-ordinated operation of the GB transmission system;*

- P81 already achieves this objective; introducing alternative P213 would not make any changes to the current obligations.

(c) *Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity;*

- Alternative P213 does not promote competition as using a single MPAN solution the Customer will not have the opportunity to choose different Suppliers for the import MPAN or the Export MPAN. P81 allows the Customer to choose different Suppliers for the Import and Export MPAN.
- Dependant on which solution Suppliers support P81/P213 it may prevent the Customer from changing Supplier as the chosen Supplier may not support the P81/P213 current solution the import/export MPAN is set-up.

(d) *Promoting efficiency in the implementation and administration of the balancing and Settlement arrangements.*

- Distributors will need to end existing combinations for existing export Standard Settlement Configuration's (SSC).
- Distributors could potentially need to introduce a new combination (import/export) for every Profile Class (PC), SSC, and Time Pattern Regime (TPR) and Line Loss Factor (LLF) (For UUE this means 41 new valid combinations).
- Distributors will need to introduce substitute export LLF table.
- Distributors are dependent on Suppliers and their agents to update their systems and notify relevant industry parties of the import/export configuration, in a timely manner for impacted Parties to be aware of the import/ export consumption.
- There is the potential that if there is no substitute export SSC provided then export units could be included in import billing?
- The current P213 do not address the fact that Distributors will still be unable to charge for export units.

General Comments

What provisions have been made within P213 for those Suppliers who will be trading on Export units from micro-generation against those who won't ie if Supplier A and customer chooses to trade for Export, but on COS Supplier B chooses not to and prefers to treat it as spillage. Will there be some communication linkage or will the status quo continue and Export SSC remain.

How does this SSC proposal take account of micro-generation apparatus that is disconnected ie if a customer switched off or disconnected their apparatus how would that feed into settlements in terms of data flow notification from the Supplier?

With DNO's constructing a separate MPAN for each supply at the beginning of the connection we have control that there is a robust and accurate mechanism, which aligns to the on site behaviours of Import and Export power flows and also matches to any disconnection of such (MPRS is set up to comply with this currently). To create SSC's would put the governance fully in the hands of Suppliers, which would pose a risk to us that we are at the mercy of their systems and updating processes (not working too well currently in existing mechanism).

UUE currently have 13 microgeneration sites which have separate Import and Export MPANs. There are a few data issues with these sites as the Exports are not running smoothly through settlements due to the Suppliers not updating the relevant system (MPAS). Alternate P213 would not prevent this either as we are still dependent on Suppliers updating the relevant information in MPAS. Introducing alternative P213 could prevent any data going through settlements due to the complexity of having two SSC/LLF's on one MPAN.

There would be substantial costs to UUE if alternative P213 was approved as there are major system changes required and timely administration work to provide the relevant data for MDD. Currently the change from P81 to alternative P213 does not benefit the Industry and financially is of no benefit to Distributors, as the costs incurred could not be recuperated