



Change Proposal Circular:

CPC00706: Impact Assessment of CP1360, CP1361, CP1362, CP1363 and CP1364

Responses for CP1362 'Removal of Residual Negative EACs'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	No	Yes	30
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	Yes	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	Neutral	Yes	90
Npower	Supplier and Supplier Agents (NHH & HH)	Yes	Yes	180
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Yes	Yes	90
British Gas	Supplier	No	Yes	365

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	<p>For which role is your organisation impacted? As an LDSO we are indirectly impacted on the basis that we use EACs. Replacement of erroneous EACs will allow for more accurate read validation which in turn contributes towards more accurate revenue allowances.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
Imserv Europe Ltd	No	Yes	<p>Agree change comment - Whilst we agree that some action should be taken to remove all of the residual negative EACs and agree with the spirit/sentiment of the proposal, we do not think this is the correct solution.</p> <p>For which role is your organisation impacted? NHHDA (& NHHDC?)</p> <p>Please state what the impact is - The centrally provided script will need to be run – needing IT resource, testing etc.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our costs</p> <p>Associated costs comment – Not yet quantified – but anticipated to be small</p> <p>Any other comments - As the NHHDA data comes from NHHDCs, we would suggest a better solution would be to fix the data in the source systems wherever possible. We would prefer a solution that encouraged/mandated Suppliers and NHHDCs to take positive steps to resolve residual negative EACs ASAP – with potentially some sort of solution like the one being proposed here in, say, 12 months time for all those that still haven't been actioned.</p>
Lowri Beck Services Limited	Neutral	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	Yes	Yes	<p>Agree change comment - We are supportive of this change in principle but we have concerns regarding suggested “big bang” approach which could have an adverse impact on Suppliers with regard to trading performance or supplier charges.</p> <p>For which role is your organisation impacted? Supplier and NHHDA</p> <p>Please state what the impact is - Data revisions and management of flows with revised data</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None</p>
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p>

Detailed Impact Assessment Responses			
			<p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – No costs involved</p>
SSE Energy Supply Limited	Yes	No	-
Northern Powergrid	Yes	Yes	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer.</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is - Same answer as Q2</p>
Siemens Metering, Communications & Services	Neutral	Yes	<p>Agree change comment - We previously underwent a similar exercise to this, prior to the implementation of CP1311, therefore we don't believe that we currently hold any residual negative EACs.</p> <p>For which role is your organisation impacted? NHHDA</p> <p>Please state what the impact is - Running the proposed script</p> <p>Associated costs comment – Cannot be certain of costs at this stage, but resources would be required for testing and implementation of the script.</p>
Npower	Yes	Yes	<p>Agree change comment - Npower supports this change.</p> <p>For which role is your organisation impacted? Supplier & NHHDC</p> <p>Please state what the impact is - As a Supplier & NHHDC we currently utilise the corrective techniques prescribed within the Code and Subsidiary Documents and any changes to those documents would have an impact on our organisation</p> <p>Lead time comment - Npower would expect that significant changes to the Code and / or Subsidiary Documents would be implemented in a manner that allowed all Parties sufficient time to make the relevant process / system changes necessary.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No, we would support June 2012 as the implementation date for this change as long as this Change Proposal is approved in the next month to allow development to begin as soon as possible.</p> <p>Associated costs comment – We are currently not in a position to provide related costs for implementing this change.</p> <p>Any other comments - Whilst supportive of this Change Proposal, npower request that ELEXON consider the potential impact on RF Performance both for individual Supply IDs and also across the Industry or removing Negative EACs. Negative EACs may have a</p>

Detailed Impact Assessment Responses			
			small impact on RF Performance and a change in the rules around their use may have a detrimental impact on Supplier / Industry RF Performance.
Scottish Power	Yes	Yes	<p>Agree change comment - Will this cause a potential mismatch between the volumes held by NHHDC systems and what is held in NHHDA? Should a review of negative EACs that currently exist in NHHDC systems be carried out as part of this CP?</p> <p>Also, the implementation of this script will have a large impact on the NHH %AA performance figures that are currently being reported by all Suppliers. Any existing negative EAC will be used in the %AA calculation, so if these are removed it will significantly increase the EAC volume reported by each Supplier, NHHDC and NHHDA.</p> <p>Before this change is progressed ELEXON must carry out a full impact assessment for NHH %AA performance.</p> <p>For which role is your organisation impacted? Supplier, NHHDC and NHHDA</p> <p>Please state what the impact is - Increase EAC volumes currently held within NHHDA system and drastically increase the total EAC volume associated with each Supplier / Agent ID.</p> <p>Lead time comment - Allow time to complete risk assessment on current NHH %AA reporting figures and re-forecast RF and R3 performance going forward.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Potential cost associated with increased Supplier Charges if %AA performance was to drop below current thresholds.</p>
British Gas 0	No	Yes	<p>Agree change comment - A blanket change of all residual negative EAC's with default EAC's is the wrong approach to resolve this issue. This solution could result in over correction where only small negative EAC's are in place. Suppliers should resolve these by obtaining actual reads.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Removal of negative EAC's may impact on suppliers settlement performance. Small negative EAC's could potentially be replaced by high positive EAC's which could be equally incorrect.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes. See above comments Suppliers should resolve by obtaining actual reads.</p> <p>Associated costs comment – We have not been able to obtain a cost for this change in time for the response.</p>

No comments received on the redlined text.