



Change Proposal Circular:

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

Responses for CP1361 'Removal of Extreme 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	60
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	No	Yes	120
Npower	Supplier and Supplier Agents (NHH & HH)	Yes	Yes	180
Scottish Power	Supplier, NHHDC, NHHDA, Generator	No	Yes	180
British Gas	Supplier	No	Yes	120

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 - There is no definition of "extreme" to be able to assess the likely impact of this change. NHHDCs are often unable to make a decision on the likely load of a customer – especially where the read history is limited, sporadic over a long period or where there has been a recent change – and as such we are against an obligation on NHHDCs to force them to have to "guess" at the correct customer load</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - We would have to undertake some fixes that we do not currently do – as we are often unable to determine whether some EACs are valid or not – so we rely on Supplier interaction to trigger these fixes – this would cause us to have to be more proactive</p> <p>Lead time comment - Extra Work Instructions and training</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. Dependent on what is classed as "extreme"</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>For which role is your organisation impacted? Supplier and NHHDC</p> <p>Please state what the impact is - Process changes and management of 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> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>

Detailed Impact Assessment Responses			
			Associated costs comment – Low
Western Power Distribution	Yes	No	For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data. Would implementation in the proposed Release have an adverse impact on your organisation? No Associated costs comment – No costs involved
SSE Energy Supply Limited	Yes	No	Agree change comment - From a DC and supplier perspective we completely agree, these EAC should be removed from settlements immediately and that the onus is on the DC to perform that task.
Northern Powergrid	Yes	Yes	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. For which role is your organisation impacted? LDSO Please state what the impact is – See answer to Qu 1. Would implementation in the proposed Release have an adverse impact on your organisation? No as the peaks of volatility would be smoothed out.
Siemens Metering, Communications & Services	No	Yes	Agree change comment - Our support for these changes would depend on whether P274 is approved, as this would end the use of the GVC process. It seems unnecessary to make any changes relating to GVC, if the intention is to stop using this type of adjustment. For which role is your organisation impacted? NHHDC Please state what the impact is - We believe that the current version of EAC software is already compliant with this requirement (following changes in relation to CP1311). However changes may be required to some of our processes. Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact other than potential conflict with P274 Any other comments - It would be useful to have a definition of what should be classed as an extreme EAC.
Npower	Yes	Yes	Agree change comment - We do agree with this change in principal however, we do feel there needs to be some clarity or at least a definition of what would be considered to be an "Extreme" EAC. If ELEXON were to publish some criteria or to stipulate existing criteria were to be used (existing PEEEX thresholds for Profile Classes for example) then we feel this would provide consistency throughout the industry. For which role is your organisation impacted? Supplier & NHHDC 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. Lead time comment - Npower would expect that significant changes to the Code and / or Subsidiary Documents would be

Detailed Impact Assessment Responses			
			<p>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>
Scottish Power	No	Yes	<p>Agree change comment - We currently operate a detailed process for the review of high erroneous EACs and as such already meet the requirements of this proposed solution. Also, given the solution is already available as an option in NHHDC systems and the BSC it would be difficult to justify a system change with an associated financial development cost.</p> <p>For which role is your organisation impacted? Supplier and NHHDC</p> <p>Please state what the impact is - Minimum impact as we already review instances of high erroneous EACs and operate tighter thresholds than the ones already set by ELEXON. However, this change would impose a compulsory Impact Assessment on us as we review the existing optional process.</p> <p>Lead time comment - 6 months would be required to carry out any testing or training requirements associated with moving this process to a mandatory platform.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Minimum costs associated with system Impact Assessment and integration with new platform that is currently in development. High level cost to carry out Impact Assessment and alignment with existing system development projects.</p>
British Gas	No	Yes	<p>Agree change comment - This change is not required as a process to manage and resolve erroneous large EAC's and AA's already exists within the performance assurance framework. ELEXON monitor and report on high value EAC/AA to suppliers and to industry. This change would not represent an efficient use of BSC resources.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Although the requirement is on NHH DC's there will be a cost impact for carrying out this additional activity which will feed through to suppliers.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes</p> <p>Associated costs comment – This change represents a duplication of processes that already exist within the BSC and therefore parties will incur additional unnecessary costs</p>

No comments received on the redlined text.