Change Proposal Circular

CPC00692: Impact Assessment of CP1343

Responses for CP1343 'Appropriate Line Loss Factors for High Voltage Customers metered at primary substations'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Yes	Yes	See comment
Electricity North West Limited	DNO	Yes	Yes	See comment
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
CE Electric UK (YEDL & NEDL)	LDSO	Yes	Yes	30
Accenture Services Limited (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-

Any Questions

If you have any queries, please contact:
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Summary of Responses				
Western Power Distribution	Distributor, MOA	Yes	Yes	-
npower	Supplier & Supplier Agents	Neutral	No	180
E.ON Energy Solutions	HH & NHH MOA, NHH DC-DA	Neutral	No	-
Scottish & Southern Energy Plc	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	-
GDF SUEZ Energy UK	Supplier	Yes	Yes	120
E.ON UK	Supplier	Yes	No	-

Detailed Impact Assessment Responses			
Organisation	**Agree?**	**Impacted?**	**Comments**
Independent Power Networks Limited	Yes	Yes	**For which role is your organisation impacted?** LDSO **What is the impact?** IPNL is supportive of the change as IPNL has a number of HVS customers and the proposal will enable IPNL to use generic LLFs on these customers as currently applied rather than having to generate site specific LLFs as there is currently a shortage of available codes across all DNOs. **Notice required to implement** - As IPNL operates in multiple DNO regions, IPNL would require the same development time as the DNOs themselves. **Would implementation in the proposed Release have an adverse impact on your organisation?** No
Electricity North West Limited	Yes	Yes	**Agree change comment -** This change ensures that there is no consequential impact on LLFs when EDCM is implemented due to the changes to the definitions associated with HVS. **For which role is your organisation impacted?** Distributor **What is the impact?** We agree with the impact identified within the change proposal. Without such an amendment not only would we have to create site specific LLFs and the impact this may have on customers and suppliers but we would also have to change our IT applications associated with MPAN generation and billing of suppliers. **Notice required to implement** - This is considered a minor but important change and as such would form part of next year's submission if approved in line with the suggested timetable. **Would implementation in the proposed Release have an adverse impact on your organisation?** No. It would have quite the reverse.

Detailed Impact Assessment Responses			
Organisation	**Agree?**	**Impacted?**	**Comments**
			Associated Costs - There are no consequential costs of implementing such a change. It is more the reverse in that there would be a significant IT and business process cost by not implementing it.
TMA Data Management Ltd	Yes	No	-
CE Electric UK	Yes	Yes	**Agree change comment** - This proposed change would minimise disruption to HV customers metered at primary substations (HVsub customers) who may become subject to a new EHV use of system charging methodology and their suppliers. It does not sacrifice the accuracy of settlements with regards to losses because the physical position of these customers on the network is not changing. **For which role is your organisation impacted?** As an LDSO - required to calculate line loss factors under BSCP128. **What is the impact?** Minimal. The change proposal would require us to check the definitions of voltage levels within our Line Loss Factor (LLF) methodology prior to submission which we would do anyway. **Notice required to implement** - We would not need much notice for us to implement this change if it were approved, although 30 days notice would be reasonable. **Would implementation in the proposed Release have an adverse impact on your organisation?** No. We would be able to continue to apply HVS generic losses to HV customers metered at primary substations. **Associated Costs** - Envisaged as minimal. **Any other comments** - We think it is important that distribution network operators continue to have the option of applying generic HVS line loss factors to HVsub customer in order to minimise unnecessary administration, minimise cost and reduce unnecessary disturbance for HVS customers and their suppliers. We believe the change proposal demonstrates a pragmatic approach to managing and applying appropriate line loss factors for HV sub customers if or when such customers move from the CDCM (the use of system charging methodology for LV and HV customers) to the EDCM (EHV use of system charging methodology). Any future change that required LDSOs to calculate site specific line loss factors for current HVsub customers is likely to have the following consequences: • HVsub customers moving to the EDCM are likely to face disturbance in the form of revised use of system charges any change to their LLFs would cause further (and unnecessary) disturbance; and • Significant unnecessary additional costs for LDSOs.
Accenture Services Limited (for and on	Yes	No	**Would implementation in the proposed Release have an adverse impact on your organisation?** No adverse impact is expected, we would still expect to meet the timelines as identified

Detailed Impact Assessment Responses			
Organisation	**Agree?**	**Impacted?**	**Comments**
behalf of Scottish Power)			in BSCP 128. **Associated costs** - We do not envisage any additional costs at this time.
Western Power Distribution	Yes	Yes	**For which role is your organisation impacted?** Distributor **What is the impact?** This CP confirms the approach we need to take when calculating LAFs for these customers **Notice required to implement** - We already operate in the manner required **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Associated costs** – no cost
npower	Neutral	No	**Notice required to implement** - Although initial analysis of this change indicated that there will be no impact on npower directly, we would not expect any changes within the industry to be implemented without a lead time of at least six months.
E.ON Energy Solutions	Neutral	No	-
Scottish & Southern Energy Plc	Yes	No	-
GDF SUEZ Energy UK	Yes	Yes	**Agree change comment** - GDF SUEZ Energy UK supports this change on the basis that it provides a simpler method for calculating losses that apply to HV Substation customers than that proposed under EDCM. This helps reduce the increases in cost and complexity of supplying such customers under EDCM. **For which role is your organisation impacted?** Supplier **What is the impact?** Pricing and Billing Systems that use the LLF will be impacted by the changes under EDCM and this change will reduce the EDCM impacts on systems. **Would implementation in the proposed Release have an adverse impact on your organisation?** No
E.ON UK	Yes	No	**Agree change comment -** On the face of it, it may seem that more site specific LLFs would make settlement more accurate, this solution at worst maintains the Status Quo. There may be a marginal benefit to settlement but this would seem to be outweighed by the disruption to customers already facing changes due to moving from EDCM to CDCM. This would seem a pragmatic solution by using the generic LLF for these customers to look like a site specific LLF, where the Distributor believes it is appropriate.

No comments received on the redline text