



## Change Proposal Circular – Collated Responses for CPC00715

### CPC00715: Impact Assessment of CP1376

#### Responses for CP1376: Issues with Reporting Failed Instructions (D0023) Flows

##### Summary of Responses CP1376

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
EDF Energy	Supplier	Yes	Yes	182
Electricity North West Limited	Distributor	Yes	No	n/a
IMServ Europe Ltd	HHDC, DA and MOP NHHDC, DA and MOP	Neutral	Yes	90
Npower	Supplier, NHHDA, NHHDC	Yes	Yes	We would meet the implementation date of June 2013
ScottishPower	Distributor	Yes	Yes	180
STARK	NHHDC/DA	Yes	Yes	30
Western Power Distribution	LDSO	Yes	No	n/a

**Any Questions**

If you have any queries, please contact:

[CCC@elexon.co.uk](mailto:CCC@elexon.co.uk)

Or contact:

**BSCP40 Change Process Task Leader****020 7380 1435**

<b>Detailed Impact Assessment Responses CP1376</b>			
<b>Organisation</b>	<b>Agree?</b>	<b>Impacted?</b>	<b>Comments</b>
EDF Energy	Yes	Yes	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> NHHDC/DA</p> <p><b>Please state what the impact is</b> – Minor impact</p> <p><b>Lead time comment</b> – 182. We note the schedule for implementation in June 2013. However we would prefer the release date pushed forward to February 2013</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – See answer to question 3</p> <p><b>Associated costs comment</b> – We do not perceive any associated costs</p> <p><b>Any other comments</b> – n/a</p>
Electricity North West Limited	Neutral	No	<p><b>Agree change comment</b> – Neutral</p> <p><b>For which role is your organisation impacted?</b> n/a</p> <p><b>Please state what the impact is</b> – n/a</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – n/a</p> <p><b>Associated costs comment</b> – n/a</p>

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			<b>Any other comments</b> – None
IMServ Europe Ltd	Neutral	Yes	<p><b>Agree change comment</b> – Neutral. Clarification of expectation is a good thing, but unsure that the reporting script will provide expected output whilst some agents archive information.</p> <p><b>For which role is your organisation impacted?</b> - NHHDC/NHHDA</p> <p><b>Please state what the impact is</b> – The impact would be running a script periodically on the NHHDA database in an attempt to reconcile the D23 exception counts between NHHDCs and NHHDAs.</p> <p><b>Lead time comment</b> – 90. Unsure of what would be required, possibly testing of new DA script and review of how we identify the high materiality exceptions where we have been de-appointed</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> - Do not believe so</p> <p><b>Associated costs comment</b> – Circa £3,000 implementation only</p> <p><b>Any other comments</b> –</p> <p>We have reservations as to whether the count of D23 exceptions between NHHDC and NHHDA will ever match as we know some NHHDCs archive their exceptions after three months and because of this we would like to question how the counts can ever be reconciled at a yearly audit.</p> <p>If the industry has a standard script for reporting D23 exceptions from NHHDA then do we need a reconciliation of these with NHHDC at all? We believe that most agents work their D23 exceptions from NHHDA and not from NHHDC.</p> <p>CP1376 details, under the 'Description of Problem/Issue' section, that exceptions associated with the current</p>

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			<p>NHHDC have a higher impact on settlements. If the current NHHDC was appointed a week ago and it transpires that they will be de-appointed in three weeks time, and the previous NHHDCs EFD was prior to DF, then you could argue the exceptions in the previous NHHDCs period will have far more impact on settlements.</p> <p>If the D23 reprocessed flag identifier of 'X' (unresolvable) is to be used in the prioritisation of D23s in the new script then it would be useful for NHHDCs to fully understand how this flag is applied to individual D23 exceptions.</p>
Npower	Yes	Yes	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> Supplier, NHHDC and NHHDA</p> <p><b>Please state what the impact is</b> – Change will be required to existing systems reporting functions but this will benefit our yearly D0023 calculations</p> <p><b>Lead time comment</b> – We would meet the implementation date of June 2013</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No</p> <p><b>Associated costs comment</b> – Minimal Costs</p> <p><b>Any other comments</b> – No</p>
ScottishPower	Yes	Yes	<p><b>Agree change comment</b> – Yes. The reporting of D0023s and its related BSC audit issue has always been a problem for Suppliers and NHHDCs because the failed instructions are often immaterial. Our performance against D0023s is measured purely on the number of failed instructions and as the majority of these</p>

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		<p>instructions will never be worked it is not a fair assessment of performance.</p> <p>These changes will hopefully bring stability and clarity to the types of instructions Suppliers and NHHDCs should be working on, as well as creating an reliable measure for Industry performance.</p> <p><b>For which role is your organisation impacted?</b> Supplier, NHHDC, NHHDA</p> <p><b>Please state what the impact is –</b></p> <p>A new process would be required for Supplier’s allocation of material Failed Instructions to the outgoing NHHDC. As NHHDA already has reporting requirements in respect of Failed Instructions, the new script would simply replace this so there would be minimal impact on NHHDA.</p> <p>We would also need to make changes to our internal NHH performance reporting tool as the level of D0023s is a category within this tool. We may decide to leave the tool as it is and then compare the output against the figures that will be generated from the new scripts.</p> <p><b>Lead time comment –</b> 180 days. This time will be required to assess the internal changes we will need to make to our existing D0023 reporting structure.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b></p> <p>No, the proposed date of June 2013 should provide enough time for us to review internal processes and ensure we are aligned with the changes.</p> <p><b>Associated costs comment –</b> There may be a small cost associated with changing our internal reporting framework to align with the reporting strategy of the new scripts.</p> <p><b>Any other comments –</b> n/a</p>
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STARK	Yes	Yes	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> NHHDC/NHHDA</p> <p><b>Please state what the impact is</b> – We would be impacted in a beneficial manner i.e. NHHDC will have more awareness of where impact is being made and better able to focus on where the problems really are.</p> <p><b>Lead time comment</b> – 30</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No</p> <p><b>Associated costs comment</b> – None Expected.</p> <p><b>Any other comments</b> – No</p>
Western Power Distribution	Yes	No	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> n/a</p> <p><b>Please state what the impact is</b> – n/a</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – n/a</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> – n/a</p>

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Comments on the redline text CP1376					
No.	Organisation	Document name	Location	Severity Code	Comments
1	ScottishPower	BSCP504	Section 1.2.5, Paragraph 2, Sentence 2	L	Suggest that the wording of sentence 2 be changed to remove ambiguity over the responsibility for outstanding instructions. Sentence beginning "Responsibility for these ..." to be changed to "Responsibility for these files shall be held <b>by the old NHHDC</b> until all outstanding instructions ... etc".  The previous sentence mentions the new NHHDC immediately prior to the sentence on "responsibility".
2	STARK	BSCP504	1.2.5	L	This could reduce the risk of data being duplicated or superceded by erroneous or corrupt data where an agent feels forced to send data to fulfil the obligation.
3	STARK	BSCP505	1.6	L	Can only be of benefit to the audit process.

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