



## Change Proposal Circular – Collated Responses for CPC00721

### CPC00721: Impact Assessment of CP1378v2.0

#### Responses for CP1378v2.0: Facilitating appointment of Multiple HHMOAs for Third Party Access on Licence Exempt Distribution Network

##### Summary of Responses for CP1378v2.0

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Meter Operators	No	Yes	00
British Gas	Supplier	Neutral	No	00
EDF Energy	Supplier, MOP	Yes	Yes	180
Electricity North West Limited	Distributor	Yes	Yes	30
GDF SUEZ Marketing Ltd	Supplier	Neutral	Yes	00
IMServ	HHDC, NHHDC, HHDA, NHHDA, HHMOP, NHHMOP	No	Yes	Unknown
Northern Powergrid	LDSO, UMSO	Neutral	No	00
npower	Supplier and Supplier Agents (NHH and HH)	No	Yes	180



#### Any Questions

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Summary of Responses for CP1378v2.0				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
ScottishPower	Distributor, Supplier, Supplier Agents	No	Yes	180
SSE	Supplier & Party Agents	No	N/A	N/A
SSE Power Distribution	LDSO	Neutral	No	00
TMA Data Management Ltd	NHHDC, NHHDA, HHDC and HHDA	No	Yes	60
Western Power	LDSO	No	Yes	30

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Detailed Impact Assessment Responses CP1378v2.0			
Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	No	Yes	<p><b>Agree change comment</b> – No - I have previously made representations on the 'third party access' CP1378v1 that a single 'controlling mind' MO is essential if complex sites using difference metering is used. My reasons are:</p> <ol style="list-style-type: none"> <li>1 Each customer can select their own supplier               <ol style="list-style-type: none"> <li>a. This is essentially the purpose of the third party access</li> </ol> </li> <li>2 Each supplier must appoint the same common HHDC               <ol style="list-style-type: none"> <li>a. A single HHDC is essential, so that they can read the 'total meter' and each sub-meter – then deduct each sub-meter from the total to make the residual for the landlord, while passing on the consumption on each sub-meter trading independently to the relevant customers. The HHDC can also estimate missing data in the full knowledge of the impact on the total site. The sum of the estimates would not be expected to exceed the 'total meter'.</li> </ol> </li> <li>3 Each supplier must appoint the same common HHMO, a single HHMO is essential to ensure:               <ol style="list-style-type: none"> <li>a. A single HHMO has an understanding of the electrical network of the whole site to ensure that all electrical supplies are accounted for – do not want any of the installation missed from settlement or double counted. Particularly relevant when different operating regimes of the electrical network can result in different flows of energy (e.g. HV rings, LV back feeds)</li> <li>b. The one HHMO 'controlling mind' can manage different sub-deduct meters within the site being added, or disconnected or combined. Every MPAN in the site needs</li> </ol> </li> </ol>

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			<p>to be included in the single 'complex site' form. Any sub-deduct metering within the site which is connected, de-energised or disconnected needs to be correctly identified in the complex site form, otherwise under/over counting in settlement may occur. The effective from date of the complex site form is an essential method of managing the timing of changes</p> <ul style="list-style-type: none"> <li>c. One HHMO being accountable for the site ensures that the BSC Parties, and TAA, can attribute errors or omissions to a single HHMO and/or HHDC rather than each party blaming another.</li> <li>d. Single parties ensure more effective communication of changes.</li> </ul> <p>Version 2 of this change directly conflicts with the reasons described in section 3. These sites are Complex and must be dealt with as if they are Complex sites if the complete picture of the site is to be known. An HHDC cannot perform the same 'controlling mind' role as they do not know the electrical infrastructure at the site, and how the metering has been installed. The HHDC collects and processes the data based on the instructions of the MO. The HHDC will not know that the site is complex unless the MO tells them, and the HHDC will not know there are multiple MPANs associated with the site unless the MO tells them. The HHDC cannot create a Complex supplementary mapping sheet without the level of knowledge that the MO has about the site. The Suppliers will not necessarily know that they are commencing supplying a complex site.</p> <p>The 'common' MO will identify if a supplier de-appoints them from a complex site and is able to challenge this with the supplier, to either be re-appointed, or to ensure that responsibility for the whole site is transferred to a new MO.</p> <p>All these protections are lost under this proposal. Errors in settlements will increase if this proposal is implemented.</p>

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			<p><b>For which role is your organisation impacted?</b> – Meter Operators</p> <p><b>Please state what the impact is</b> – No comment</p> <p><b>Lead time comment</b> – 0 days</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No comment</p> <p><b>Associated costs comment</b> – No comment</p> <p><b>Any other comments</b> – No comments.</p>
British Gas	Neutral	No	<p><b>Agree change comment</b> – Neutral</p> <p><b>For which role is your organisation impacted?</b> – No comment</p> <p><b>Please state what the impact is</b> – No comment</p> <p><b>Lead time comment</b> – No comment</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No comment</p> <p><b>Associated costs comment</b> – No comment</p> <p><b>Any other comments</b> – No comments.</p>
EDF Energy	Yes	Yes	<p><b>Agree change comment</b> – Yes - Page 3, Definition of Boundary Point and 3rd Party Metering Point Requirements:</p> <p>There is a statement that the 3rd Party Metering System would not necessarily be complex and the only reason that a dispensation would apply is because it is a 3rd Party Metering System. It is accepted that a generic dispensation could be used.</p>

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			<p>An alternative could be that Elexon generate a generic dispensation that can be used by all for this scenario rather than have a process to require dispensation to be applied every time this scenario arises?</p> <p>Page 3 – Conditions to ensure accuracy of settlement</p> <p>Who informs the Boundary Point MOP that a 3rd Party Metering System has been installed? As Boundary Point Supplier is responsible for validating and agreeing mapping before differencing commences there should be a specific responsibility placed on the Boundary Point Supplier to notify their appointed MOP that the Boundary Point Metering System is now 'complex'.</p> <p>How does a Supplier gaining a customer that has a 3rd Party Metering System or Boundary Point Metering system know the arrangement exists and which HHDC must be appointed?</p> <p>Who has the ultimate authority to specify who the HHDC will be in these scenarios? We assume that it is the Supplier of the Boundary Point Metering System that will specify who the HHDC but this should be specifically stated.</p> <p>What happens if the Supplier gaining a 3rd Party Metering system has no HHDC contract with the 'Common HHDC'?</p> <p>Can a Supplier who wins a Boundary Point Metering System choose to discontinue the difference metering arrangements?</p> <p><b>For which role is your organisation impacted?</b> – MOP</p> <p><b>Please state what the impact is</b> – Minor system change to our MOP system if the business require documentation to be stored.</p> <p><u>Impacts for CP1378v2</u></p> <ul style="list-style-type: none"> <li>It's not clear who will be responsible for identifying complex/ third party metering? How will suppliers/MOAs/DC identify Exempt/Embedded Networks? CP1378 v2 suggests the MOA of the boundary point meter system will be obliged to indicate on the "complex site supplementary</li> </ul>

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			<p>information form where difference metering is in place.</p> <ul style="list-style-type: none"> <li>If the Boundary Point Supplier is responsible for validating and agreeing mapping before differencing commences should there be a specific responsibility placed on the Boundary Point Supplier to notify their appointed MOP that the Boundary Point Metering System is now 'complex'? This will impact the supplier but is closely linked to first issue.</li> <li>CP1378 is most likely to impact the DC? Whilst this process is initially consider to be outside the system it is not clear what flows will be impacted by third party.</li> <li>Not all third party exempt embedded sites will be complex therefore the current obligation on MOA to identify difference metering will not fully identify third party arrangements? Is it the dispensation that makes the metering complex and do all 3rd party metering points require a dispensation?</li> <li>Obligations and timescales on the MOP &amp; DC will need to be written into the BSC, BSCPs; Further clarity on the process is required and a view from Gemserv on the impact on the MRA? I have a contact from DNO who is planning to raise this at IREG however this may focus on DNO requirements, see general impacts DUoS charging.</li> <li>Definitions of boundary point and 3rd party metering points is required and Metering Ts&amp;Cs may need to reflect the requirement to appoint the same DC, choose an appropriate MOP.</li> </ul> <p><u>General Impacts</u></p> <ul style="list-style-type: none"> <li>Regulatory obligation, the supplier must not obstruct either the exemption holder or embedded customer from obtaining third party supply. This EU directive and DECC also associates third party supply with customer switching requirements.</li> <li>DCUSA (DCP124) looks at the requirement to extend the National Terms of Connection</li> </ul>

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			<p>(NTC) to include Third party exempt networks.</p> <ul style="list-style-type: none"> <li>How will suppliers be able to gain access to their embedded site?</li> <li>T &amp;Cs may require to advise on third party i.e. changes in portfolio and volume tolerance. How do we indemnify against loss of volume if an exempt network requires third party supply.</li> <li>DUoS charging - the current work around proposed is to use a dummy non settlement MPAN to provide aggregated consumption data from BPM to ascertain the required DUoS calculation, if the BPC wishes to retain this for maintaining ASC, bilateral agreements required.</li> <li>Procedure and training</li> </ul> <p><b>Lead time comment</b> – 180 days - The implementation date is dependent on response to the questions being raised above</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – Provided on the responses to Q1 there could be an issue with the release date if further system changes are required</p> <p><b>Associated costs comment</b> – No costs available at this time</p> <p><b>Any other comments</b> – No comments.</p>
Electricity North West Limited	Yes	Yes	<p><b>Agree change comment</b> – Yes - The proposed solution sets out the obligations on the Boundary MSID MOA and the Third Party Supplier/MOA to provide the relevant details to the common HHDC to ensure the correct data enters into settlements.</p> <p><b>For which role is your organisation impacted?</b> – Distributor</p> <p><b>Please state what the impact is</b> – We will need to know the number of customers on the Private Network who have appointed their own Supplier so we have an understanding of what data we will</p>

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			<p>be receiving. This information will allow us to assess the impact on our DUoS tariffs and charging methodology.</p> <p><b>Lead time comment</b> – Clarifying the rules has no major impact. The current processes to support Third Party Access on Private Networks are still at a high level and end to end processes need to be developed with ownership and timescales. If the solution for new Meter Timeswitch codes and Line Loss Factors are required this is at least a 6 week lead time to implementation dependent on the Market Domain schedule.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No, we would require a business workaround in place until the Third Party Access Working Group concluded impacts and changes required had been raised and gone through relevant change process.</p> <p><b>Associated costs comment</b> – Until there is a full understanding of the end to end process and solution and this has gone through the relevant change process we will understand the full costs.</p> <p><b>Any other comments</b> – No comments.</p>
GDF SUEZ Marketing Ltd	Neutral	Yes	<p><b>Agree change comment</b> – Neutral - We are happy to defer to the SVG view if the appointment of different Meter Operators would have a settlement impact within Private Networks. If not we would like to see this implemented to enable customer choice over their agents.</p> <p><b>For which role is your organisation impacted?</b> – Appointment of Meter Operators for MPANs within 3rd Party Networks.</p> <p><b>Please state what the impact is</b> – If the change is accepted we would be able to facilitate customer choice when appointing Meter Operators for affected supplies.</p> <p><b>Lead time comment</b> – 0 days</p>

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			<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No Negative Impact.</p> <p><b>Associated costs comment</b> – No cost.</p> <p><b>Any other comments</b> – No comments.</p>
IMServ	No	Yes	<p><b>Agree change comment</b> – No</p> <ol style="list-style-type: none"> <li>How will the HHDC be informed of which MPANs are embedded within the Private Network of the 'Landlord' MPAN? Will this be via a Dataflow or other medium? Will there be any indication at the 'tenant' level that the 'tenant' has a parent 'Landlord', if so how.</li> <li>What is the value of the 'Landlord' sending a blank complex form, the D268 itself can indicate the site is Complex.</li> <li>If the 'Tenant' also had export capability, how would this be handled? Or. if the tenant site was also to be treated as Complex how would this effect the calculation of the 'Landlord' Supply?</li> <li>How would estimation be handled? If data needed to be estimated, say based on EAC, for a 'Tenant', would the HHDC be expected to use this in the 'Landlord' netting calculation? If this calculation resulted in a negative figure being produced, would the HHDC submit zero consumption for the period(s) affected?</li> <li>What would prevent a new Supplier of one of the tenants (unaware of the arrangement), appointing a different HHDC. Also could happen on 'Landlord' MPAN</li> <li>If a query is raised on the 'Landlord' consumption and the 'Landlord' and 'Tenant' MOAs are in dispute where the error lies, how would this be resolved? For example, the 'Landlord' thinks his consumption data is too high, he therefore raises it with either his MOA or Supplier. The MOA checks out the metering they installed and reports back that it is working correctly. The 'Landlord' still feels</li> </ol>

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			<p>his data is too high. What happens next? In such a case, does the Supplier of the 'Landlord' send a D0001 quoting the 'Tenants' MPANs to the MOAs? The MOAs may respond and say that the D0001 is not coming from the registered Supplier for that/those MPANs, or such information is confidential. Or would such a query then end up with the HHDC and would the expectation be that this then triggers a process whereby D0001s are sent, one to each 'Tenant MOA'?</p> <p>How would reactive data be handled?</p> <p><b>For which role is your organisation impacted?</b> – HHDC</p> <p><b>Please state what the impact is</b> – Unknown, this is dependent on the answers to question 1.</p> <p><b>Lead time comment</b> – Unknown, this is dependent on the answers to question 1.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No comment</p> <p><b>Associated costs comment</b> – No comment</p> <p><b>Any other comments</b> – I feel that creating a process that relies on implication rather than explicit instruction is likely to increase the likelihood that incorrect data could enter the Settlement Process.</p> <p>Having no single MOA responsible for the metering equipment and associated flows that affect the data entering Settlement for the 'Landlord' supply could lead to several issues as described above.</p> <p>This also seems to place further emphasis on the HHDC to 'police' the whole arrangement and also be an arbitrator/facilitator in inter MOA disputes potentially.</p>
Northern Powergrid	Neutral	No	<p><b>Agree change comment</b> – Neutral</p> <p><b>For which role is your organisation impacted?</b> – N/A</p>

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			<p><b>Please state what the impact is – N/A</b></p> <p><b>Lead time comment – N/A</b></p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation? – N/A</b></p> <p><b>Associated costs comment – N/A</b></p> <p><b>Any other comments – No comments</b></p>
npower	No	Yes	<p><b>Agree change comment – No</b> - Although further clarity has been added surrounding the use of different HHMOAs for the Boundary and Third Party meters, issues regarding the integrity of settlements still remain.</p> <p>There also needs to be a defined process for transfer of information between Suppliers and the HHDC and at present no industry wide approach has been defined. Further clarity is required to the following statement as it doesn't define method, format or timings.</p> <p>"In order to allow the HHDC to perform this process correctly, Third Party Suppliers will need to notify the common HHDC that the Metering System is subject to a difference metering arrangement. The information must include the MSID of the relevant Boundary Point Metering System to allow the HHDC to map the Boundary Point Meter with the associated Metering Systems."</p> <p>As Third Party Metering is controlled by applying Metering Dispensations further work is required surrounding this process prior to accepting this change as there are still concerns regarding this effective in its current state. Currently a Supplier could take on a customer without knowing that a Metering Dispensation is in place or if when this dispensation is due to expire. Thus increasing the settlement risk and further complicating the process.</p> <p><b>For which role is your organisation impacted? – Supplier, HHDC and HHMOA</b></p> <p><b>Please state what the impact is – Clarification is required regarding transference of details</b></p>

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			<p>between Suppliers and HHDC to ensure any settlements risks are mitigated. There must be an agreed industry wide process to ensure data is handled correctly and in a format accessible to all parties.</p> <p><b>Lead time comment</b> – 180 days - Should this change be accepted we would request a six month implementation lead time to allow for any associated system development</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – Yes – see 2b</p> <p><b>Associated costs comment</b> – Not known at present</p> <p><b>Any other comments</b> – We fully support the necessity to promote competition but believe that consideration needs to be given to data integrity and associated issues must be fully addressed prior to implementing a change which may further complicate current settlement arrangements.</p> <p>The existing process used which appoints the same HHMOA for the Boundary and Third Party meters assists in the simplification of an already complex process, however by allowing different HHMOAs to be used it will increase the level of complexity which in turn has potential to reduce the effectiveness of the process and accuracy of data.</p>
ScottishPower	No	Yes	<p><b>Agree change comment</b> – No - We are rejecting as this will move the responsibility of maintaining the complex site to the HHDC, something ScottishPower are uncomfortable with and are unsure how it could be managed effectively, given the various problems that could arise (HHDC de-appointment, Mop appointment issues, comms/meter faults etc). We feel having a common HHMOA with a common HHDC would simplify the situation and give the HHDC and boundary Supplier clear visibility of the appropriate action/calculation to be taken by the HHDC on appointment/de-appointment of an embedded customer. We also have concerns regarding the Supplier's involvement in informing HHDC of the MSID for the other metering to be used as no</p>

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			<p>timescales for this are defined.</p> <p>The appointed HHDC, in theory, would also have to be accredited to every meter type to cover the appointment of multiple MOAs installing and using different meters.</p> <p><b>For which role is your organisation impacted?</b> – Distributor, Supplier, HHDC</p> <p><b>Please state what the impact is</b> – If the CP is approved then the HHDC will require to have in place processes that will allow them to provide both the Supplier and Distributor with accurate information which will enable them to bill their customer accordingly. We believe that difference metering, even though this will require a metering dispensation, is the most appropriate way forward. From a Distribution point of view we would expect to see MPIDs in respect of both the Exempt Network Operator and the customer(s) who have opted to appoint their own supplier</p> <p><b>Lead time comment</b> – 180 days - Given that there may be some system changes required our preference is to have a 6 month lead time prior to the change going live</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No comment</p> <p><b>Associated costs comment</b> – No comment</p> <p><b>Any other comments</b> – Regardless of who is appointed as MOp it is essential that all due processes should be applied. By due process, we would expect the site to have an appropriate settlement mpan, which will allow DUoS charges etc. to be applied correctly. In addition we need to ensure that any CT's/VT/Multi-core requirements meet the relevant Code of Practice and that test certificates are provided for the CT/VT ratios in order to avoid any non-compliance at future TAA audits.</p>
SSE	No	N/A	<b>Agree change comment</b> – No – In principle we agree with this change, however a number of

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			<p>significant questions remain and as such we are unable to make further progress with this impact assessment as currently presented.</p> <p>The following matters require clarification:</p> <ul style="list-style-type: none"> <li>• The Private Network Operator will be expected to specify the metering and contractual arrangements for Customer, but to whom?</li> <li>• Who will be expected to approach the LDNO for the new MSID?</li> <li>• The 3rd Party Supplier is expected to notify the HHDC the metering system is subject to 'difference' metering, who informs the HHMOA to the Boundary Point Metering of this arrangement?</li> <li>• The 3rd Party Supplier must be responsible for informing their appointed 3rd Party HHMOA the metering is part of a licence exempt network, but this aspect is not clearly apparent and may require further investigation to determine – to be sufficiently robust, the process must reference explicitly available information.</li> <li>• In the case of large, CT metered sites, responsibilities are not clearly defined. For CT Panels, CTs and test facilities, current responsibility lies with the DNO from point of energisation. On-going, matters such as the responsibility for registration of details and for the holding of auditable CT certification requires further guidance.</li> </ul> <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>

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**Severity Codes**

**H** (High): Prejudices document's conclusions, recommendations or fitness for purpose.

**M** (Medium): Matter of substance, but not high.

**L** (Low): Minor error but document's intention is clear.



**Any Questions**

If you have any queries, please contact:

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

Detailed Impact Assessment Responses CP1378v2.0			
Organisation	Agree?	Impacted?	Comments
			<p><b>Associated costs comment</b> – N/A</p> <p><b>Any other comments</b> – No comments.</p>
SSE Power Distribution	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> – 0 days</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> – No comments.</p>
TMA Data Management Ltd	No	Yes	<p><b>Agree change comment</b> – No - CP1378V2 proposes a transfer of responsibility to maintain the complex metering form from the MOA to the HHDC for a sub-set of complex sites, which is not acceptable. The forms are still in the MOA BSCP514 and there is a clear obligation on the MOA to transfer the complex site information during a change of MOA process (BSCP514V25 5.2.1.8). The process should be modified to ensure communications between MOA's instead of involving a third party ensuring MOAs can fulfil their obligations under the BSC and can enjoy the full benefits of competition for that subset of complex sites.</p> <p><b>For which role is your organisation impacted?</b> – HHDC</p> <p><b>Please state what the impact is</b> – LWP impact</p> <p><b>Lead time comment</b> – 60 days</p>

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Organisation	Agree?	Impacted?	Comments
			<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> – No</p> <p><b>Associated costs comment</b> – Low cost</p> <p><b>Any other comments</b> – No comments</p>
Western Power	No	Yes	<p><b>Agree change comment</b> – No - WPD supports the competitive provision of agent services but it should be recognised that customers supplied via such Third Party Meters will of necessity endure some restriction in the choices – such as choice of DC and whether to trade HH or NHH. For many customers choice of DC is of equal or more importance than choice of Meter Operator.</p> <p>We believe that the Meter Operator is the appropriate agent to determine the mapping rules for Metering Systems as they are party responsible for the configuration of the meters. If the Meter Operator is responsible for the Boundary Meter and Third Party Meters they can ensure this configuration is consistent – for example how would one map a four channel Third Party Meter to a 6-channel import / export Boundary Meters?</p> <p>We do not believe the change proposal provides adequate assurance or controls to manage the Change of Agent and/or Change of Supplier processes if there are several Meter Operators associated with the Boundary and Third Party Meters. This also applies to other aspects of the BSCP514 such as investigation of a suspected metering fault.</p> <p>We have already experienced these problems with a legacy arrangement where CoS, CoA and consequential change of meter events have caused Settlement errors.</p> <p>It should be noted that the choice of Meter Operator for import /export metering is already similarly constrained because two agents cannot share any element of a Metering System (typically the Current Transformers). This measure is to ensure the integrity of Settlements and we believe</p>

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Organisation	Agree?	Impacted?	Comments
			<p>Boundary and Third Party Meters merit the same consideration.</p> <p><b>For which role is your organisation impacted?</b> – LDSO</p> <p><b>Please state what the impact is</b> – For LDSO our concern is that the proposal will introduce unacceptable risk in to the settlement proposals, potentially impacting levels of DUoS income.</p> <p><b>Lead time comment</b> – 30 days</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> – No comment</p> <p><b>Any other comments</b> – No comments.</p>

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Comments on the redline text CP1378v2.0					
No.	Organisation	Document name	Location	Severity Code	Comments
1.	TMA Data Management Ltd	BSCP502	page 3, 6th line in the second last paragraph	M	Reference to BSCP514/8.4.9 Should be BSCP514/8.4.8, there is no BSCP514/8.4.9 in BSCP514 V15.
2.	TMA Data Management Ltd	BSCP502	page 4, first full paragraph (no indent)	M	"In order to allow the HHDC..." The obligation of communication is vague, Does the HHDC need to keep a record of that communication in the event that there are some late notifications in terms of appointment time, not allowing the HHDC to fulfil its obligations under the BSC and ensure that any responsibility of resulting incorrect data in settlement is not attributed to the HHDC?

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