

Change Proposal Circular – CPC00731 Responses

CPC00731: Impact Assessment of CP1396

Summary of Responses for CP1396

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
British Gas	Yes	Yes	Minimal	Yes
EDF Energy	Yes	No	N/A	Yes
Electricity North West Limited	Yes	Yes	N/A	Yes
Northern Powergrid	Yes	Yes	None	Yes
npower	Yes	No	N/A	Yes
ScottishPower	Yes	No	N/A	Yes
TMA Data Management Ltd	Yes	No	N/A	Yes
Western Power Distribution	Neutral	Yes	Minor	Yes

Detailed Impact Assessment Responses CP1396	
Organisation	Responses/Comments
British Gas	<p>How is your organisation impacted? – Clarification of responsibilities when submitting MDD items</p> <p>What are the associated costs on your organisation to implement the change? – Minimal</p> <p>Agree with the implementation approach? Yes</p> <p>Any other comments? None</p>
EDF Energy	<p>Agree with the implementation approach? – Yes</p> <p>Any other comments? As the change looks to clarify the MDD process, we don't perceive any impacts and welcome any clarifications for the MDD CP process.</p>
Electricity North West Limited	<p>How is your organisation impacted? – As a DNO we submit MDD Changes on a regular basis. This change will be an improvement to the submission process. The changes will provide a useful tool to ensure all necessary information is provided.</p> <p>What are the associated costs on your organisation to implement the change? – N/A</p> <p>Agree with the implementation approach? Yes. The approach to update the MDD Handbook into a new BSCP509 Appendix is logical.</p> <p>Any other comments? This will be useful and improve the MDD process.</p>
Northern Powergrid	<p>How is your organisation impacted? – As a DNO, we raise change requests to update the Market Domain Database (MDD). As such, we feel that the issue raised by the party submitting the change proposal, concerning an invalid or missing LLFC/MTC combination, should be resolved as the initial validation and feedback process carried out by BSCCo will be captured in BSCP509 making the procedure more robust.</p>

	<p>What are the associated costs on your organisation to implement the change? – As there are no changes to any systems as part of this change proposal we feel that there will be no costs to our organisation by implementing this change.</p> <p>Agree with the implementation approach? - Yes</p> <p>Any other comments? None</p>
npower	<p>Agree with the implementation approach? – Yes</p> <p>Any other comments? We agree that the proposal will clarify what checks BSCCo carry out when they receive an MDD CR and that all required information is included when preparing and submitting the MDD CR.</p>
ScottishPower	<p>Agree with the implementation approach? – Yes</p> <p>Any other comments? None</p>
TMA Data Management Ltd	<p>Agree with the implementation approach? – Yes</p> <p>Any other comments? None</p>
Western Power Distribution	<p>How is your organisation impacted? – As a party submitting MDD updates.</p> <p>What are the associated costs on your organisation to implement the change? – Minor costs to update documents.</p> <p>Agree with the implementation approach? Yes</p> <p>Any other comments? The problem the CP seems to want to resolve is the failure of LDSOs to submit all the required entity forms when creating a new LLFC. However the BSCP change to address this issue doesn't seem to do anything other than require the LDSO to send in "all the forms needed". It does not actually clearly what entity forms are needed in the various scenarios. When an LDSO does not submit forms correctly it is probably because they do not know what to do rather than a deliberate attempt to do it wrong. The solution should therefore be to document what is required so that an LDSO can check they have not missed anything.</p>

Summary of Comments on BSCP redlining		
Organisation	Document name & location	Comment
ScottishPower	BSCP509 Appendix 2 - Section 1.3 last line	Reference is made to BSC website – access to data is via www.elexon.co.uk , in addition at present known MDD information can be viewed either on ELEXON website or on the ELEXON Portal, so reference to BSC website doesn't make sense, especially if you are a new market entrant. E.g. MDD Circulars are on ELEXON website, MDD data is on Portal, you may wish to consider some form of alignment.
	BSCP509 Appendix 2 - Sections 3.1/3.2/3.4/3.22 Guidance on Change Process	Reference is made to criteria detailed in BSCP 509 section 4.2 – current section in BSCP 509 is only MDD Change Request Form F509/01 – Registration Criteria is currently defined in section 4.3.
	BSCP509 Appendix 2 - Section 3.8 Guidance on Change Process	<p>Additional validation – LLFC discontinued, advice is given to end date child combinations, however it may be helpful to add that it may be prudent at this stage to check to see if MTC/SSC combination can be end dated (Entity 54) and if so they may wish to consider the individual MTC (Entity 53) and SSC (Entity 32) to see if they can be end dated as well. This area has been covered under each of the relevant data items, but may help if repeated with regard to LLFC overall process.</p> <p>In addition it should be made clear that new LLFC can only be added to MDD with Distributor permission, furthermore any valid combinations (Entity 55, 56 and 63) that include the LLFC can only be submitted by a Distributor or with the relevant Distributor's agreement. BSCP128 may cover this area but it is worth repeating with regard to LLFC.</p>

Summary of Comments on BSCP redlining

Organisation	Document name & location	Comment
	BSCP509 Appendix 2 - Section 3.9 – Field Details, sub section Region ID	Field Details, sub section Region Id - State it should be 2 characters, however in Description/Comments field it is 'either EW for England & Wales or 'S' for ____ , presume you mean Scotland there, however if the Region ID is a mandatory 2 characters then 'S' will be invalid.
	BSCP509 Appendix 2 - Section 3.10 – Brief Description	Last sentence – 'This data is manually distributed to Market Participants, in word format, on a <i>monthly basis</i> by e-mail'. This should be ' <i>on an annual basis</i> '.
	BSCP509 Appendix 2 - Section 3.11	The Clock Interval start time is given in the format hhmmss, why do we need ss, given that the clock interval data table in MDD is published in HHMM.
	BSCP509 Appendix 2 - Section 3.25 Guidance on Change Process	First line reads 'See the Entity Diagram for valid combinations in Section 4.2' however throughout the Handbook other sections state 'see the Entity Diagram in Section 4.2' – Handbook should be consistent throughout.
	BSCP509 Appendix 2 - Glossary	Metering System was capitalised in section 1.1, therefore a brief description should be included in the Glossary, in addition it may be helpful to include a brief description of AA and EAC in the Glossary.