

Change Proposal Circular – CPC00741 Responses

CPC00741: Impact Assessment of CP1413

Summary of Responses for CP1413

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
TMA Data Management Ltd	Yes	Yes	Very low cost	Yes
Northern Powergrid	Neutral	No	None	Neutral
UPL	Neutral	No	None	Neutral
RWE Npower	Neutral	No	None	Yes
British Gas	Yes	No	None	Yes
E.ON	Yes	Yes	None	Yes
SSE	Yes	Yes	None	Yes
Electricity North West	Yes	Yes	None	Yes
ScottishPower	Yes	No	None	Yes
Scottish & Southern Energy Power Distribution	Yes	Yes	None	Yes

Detailed Impact Assessment Responses CP1413	
Organisation	Responses/Comments
TMA Data Management Ltd	<p>Do you agree with the change? Yes, all modifications, clarifications and housekeeping changes benefit the clarity of the process.</p> <p>How is your organisation impacted? – Ad-hoc procedure</p> <p>What are the associated costs on your organisation to implement the change? – Very low cost</p> <p>Agree with the implementation approach? If not, why? – Yes</p> <p>Any other comments?</p>
RWE Npower	<p>Do you agree with the change? Neutral. Partially, Npower agree to the housekeeping changes and the process reflection changes. In regards to the Clarification and process improvement changes, there are several areas where Npower would like additional clarity.</p> <p>The proposed changes to 1.4.1 introduce ambiguity to the process and do not offer qualifying scenarios where the Error Failure and Resolution process would or would not be invoked. We feel that the Error Failure and Resolution process helps drive performance and the resolution timescales for any non-compliance. However, there would need to be defining criteria to ensure consistent treatment across the industry.</p> <p>Changes that are being within section 3.2.8 need to be consistent with the proposed changes within 1.4.1. As stated in the above the use of the Error Failure Resolution process would need to be clearly defined to ensure consistency. The same comments applies to 3.2.9.</p> <p>3.4.7 it is not clear within the drafting the use of the Error failure resolution process would be used however, there would need to be a decision on this if BSCP 528 is being removed from the information required.</p> <p>In order to ensure findings are easily understood by parties it would be good to have a standard template with specific</p>

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	<p>requirements. This will promote clearer understanding of issues as well as helping the two working day deadline for accepting issues by parties.</p> <p>How is your organisation impacted? – No</p> <p>What are the associated costs on your organisation to implement the change? – None</p> <p>Agree with the implementation approach? If not, why? – Yes. The implementation approach appears to be logical however, I would Npower's above points considered and there might be a requirement to carry out a large-scale change to BSCP 535.</p> <p>Any other comments? No</p>
E.ON	<p>Agree Yes corrects and aligns with current TAPAP process, however, we do have three comments on specific redlining, captured in the below table.</p> <p>How is your organisation impacted? – The proposed changes would need to be implemented across all of E.ONs business functions (HH/NHH Supplier, DC and MO) however this would only involve adapting the current process to reflect the redline changes.</p> <p>What are the associated costs on your organisation to implement the change? – No associated costs as the team impacted will implement the changes.</p> <p>Agree with the implementation approach? If not, why? Yes</p> <p>Any other comments? We do not have any further comments/questions.</p>
Electricity North West	<p>Agree - Yes, because it builds on the contents of BSCP535 and provides clarity and improvements around the technical assurance process.</p>

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	<p>How is your organisation impacted? – To ensure, from an LDSO perspective, that staff are aware of these amendments and that any relevant processes/procedures are reviewed and updated as appropriate.</p> <p>What are the associated costs on your organisation to implement the change? – N/A</p> <p>Agree with the implementation approach? If not, why? Yes, in view of the fact the amendments provide clarity to BSCP535 together with the introduction of a few process improvements to enhance the procedure, the November 2014 Release seems appropriate for implementation.</p> <p>Any other comments? No</p>

Summary of Comments on BSCP redlining			
Organisation	Document name & location	Comment	ELEXON's recommendation
E.ON	BSCP535 'Technical Assurance: 3.2.6	<p>The amendments in section 3.2.6 will cause a loop if no response is received (option (b)) as this redirects you to 3.2.6</p> <p>Also there should be an option if the PAP appeals the non-compliance, this would link into 3.4.1.</p>	Made changes to the redlining in line with these comments.

Summary of Comments on BSCP redlining

Organisation	Document name & location	Comment	ELEXON's recommendation
E.ON	BSCP535 'Technical Assurance: 3.2.7	Section 3.2.7 does not read correctly, we believe that the intent is for suppliers to be notified in both events (a) and (b). For clarity the words 'and Notify Associated Suppliers' could be included at the end of both (a) and (b) or added as (c) and made clear that this occurs in all occasions.	Made changes to the redlining in line with these comments.
E.ON	BSCP535 'Technical Assurance: 3.4.1	For clarity section (3.4.1) should outline the timescales for appealing a non-compliance.	Made changes to the redlining in line with these comments.