

CP Consultation Responses

CP1463 'Process for ELEXON to calculate category 1 non-compliance materiality'



This CP Consultation was issued on 11 July 2016 as part of CPC00768, with responses invited by 5 August 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Siemens Managed Services	0/1	Supplier Agent: HHDC
Western Power Distribution	4/0	Distributor
TMA Data Management Ltd	0/4	Supplier Agent: HHDC, HHDA, NHHDC and NHHDA
IMServ Europe Ltd	0/6	Supplier Agent: HH and NHHDC/DA and MOP
British Gas	5/0	Supplier
Everis Consultancy obo ScottishPower plc	3/2	Generator; Distributor; ECVA and MVRNA
SSE Energy Supply Limited	4/8	Supplier; Supplier Agent: NHHMOA, HHMOA, NHHDC and NHHDA
Scottish Power Energy Retail	2/1	Supplier and Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Siemens Managed Services	✓	✓	✓	✗
Western Power Distribution	✓	✗	✗	✓
TMA Data Management Ltd	✓	✓	✓	✓
IMServ Europe Ltd	✗	✓	✗	✗
British Gas	✓	✗	✗	✓
Everis Consultancy obo ScottishPower plc	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
Scottish Power Energy Retail	✓	✗	✗	✓

Question 1: Do you agree with the CP1463 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
Siemens Managed Services	Yes	
Western Power Distribution	Yes	
TMA Data Management Ltd	Yes	
IMServ Europe Ltd	No	The CP describes how access to HH data will improve the calculation of materiality but does not specify the purpose of the materiality calculation. The consultation document references an annual report and also the raising of trading disputes however it is not clear whether the materiality calculation is required for one or both. In addition, the timescales suggested for response by the HHDC are very short and prone to failure. It only takes for the normal ELEXON contact at an organisation to be out of the office or away from their desk for a day, to lose a large chunk of the permitted time. This person would generally not have the ability to run data reports themselves and thus a request would need to be made to other teams which again causes delays. What may still not be known at this time is the date range affected by the non-compliance as further investigation by other teams may be required. Therefore unless the timescales for response are critical to a subsequent process, and this is not apparent from the document, we do not support the proposal albeit we appreciate the desire to ensure a response is received.
British Gas	Yes	
Everis Consultancy obo ScottishPower plc	Yes	

Respondent	Response	Rationale
SSE Energy Supply Limited	Yes	
Scottish Power Energy Retail	Yes	The change will bring clarity to the process.

Question 2: Do you agree that the draft redlining delivers the CP1463 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	3	1	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Siemens Managed Services	Yes	
Western Power Distribution	No	On the whole, the redlining delivers the CP1463 proposed solution however, in the new section 3.6A in BSCP27 3.6A.1 seems to create an endless loop as in the "Action" it states to "proceed to 3.6A". In addition, 3.6A.2 refers to "Within 5WD of 3.6.1B". There is no "3.6.1B".
TMA Data Management Ltd	No	We would like to see more clarity on the format of the HH data to be provided to Elexon. Would data in Excel format, in KWH be acceptable? Is reactive data required or only active data?
IMServ Europe Ltd	No	As noted above, we are unclear as to what this CP is trying to address and therefore cannot offer an opinion on the suitability of the redlining.
British Gas	Yes	
Everis Consultancy obo ScottishPower plc	No Comment	
SSE Energy Supply Limited	Yes	
Scottish Power Energy Retail	Yes	The redlined drafting is aligned to the solution.

Question 3: Will CP1463 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
3	5	0	0

Responses

Respondent	Response	Rationale
Siemens Managed Services	Yes	We need a new front end mechanism for a user to extract the HH consumption data required. We need a new business process for receiving, extracting and sending the data.
Western Power Distribution	No	
TMA Data Management Ltd	Yes	
IMServ Europe Ltd	Yes	This will impact us as a HHDC and as the largest of such in the market, it is likely that we will receive the majority of the requests. Irrespective of volume, this will always need to be a manual process in terms of receipt and response to the request. We already have the ability to extract data however requests need to be submitted on a case by case basis. In summary, no changes will be required in advance however the tight timescales may not always be achievable in practice.
British Gas	No	
Everis Consultancy obo ScottishPower plc	No	
SSE Energy Supply Limited	No	
Scottish Power Energy Retail	No	No impact.

Question 4: Will your organisation incur any costs in implementing CP1463?

Summary

Yes	No	Neutral/No Comment	Other
2	6	0	0

Responses

Respondent	Response	Rationale
Siemens Managed Services	Yes	This is a technical change that will need development and test effort. We will also need to implement a new business process. These are one-off costs. We will also incur a small cost for every request received, due to the processing effort.
Western Power Distribution	No	
TMA Data Management Ltd	Yes	
IMServ Europe Ltd	No	
British Gas	No	
Everis Consultancy obo ScottishPower plc	No	
SSE Energy Supply Limited	No	
Scottish Power Energy Retail	No	It is not expected that any costs will be incurred.

Question 5: Do you agree with the proposed implementation approach for CP1463?

Summary

Yes	No	Neutral/No Comment	Other
6	2	0	0

Responses

Respondent	Response	Rationale
Siemens Managed Services	No	Due to system changes that would be required we would require a minimum six month lead time from approval to Industry implementation. Therefore we do not agree with the proposed Implementation date of 3rd November 2016.
Western Power Distribution	Yes	
TMA Data Management Ltd	Yes	
IMServ Europe Ltd	No	As noted above, we are unclear as to the ultimate purpose of this proposal.
British Gas	Yes	
Everis Consultancy obo ScottishPower plc	Yes	
SSE Energy Supply Limited	Yes	
Scottish Power Energy Retail	Yes	Reasonable implementation approach.

Question 6: Do you have any further comments on CP1463?

Summary

Yes	No
1	6

Responses

Respondent	Response	Comments
Siemens Managed Services	Yes	Question 1: How will requests arrive? Due to the tight timescale for returning the data (5WD) we need to make sure new requests are promptly picked up. For a high volume we would prefer a DTC flow so that we can automate the process. Question 2: What volume of requests can we expect? This may determine how manual or automated our process is. Question 3: In what format should we return the HH consumption data? We would prefer DTC flow format if that is acceptable.
Western Power Distribution	No	
TMA Data Management Ltd	No	
IMServ Europe Ltd	No Comment	
British Gas	No	
Everis Consultancy obo ScottishPower plc	No	
SSE Energy Supply Limited	No	
Scottish Power Energy Retail	NO	

No comments provided on the redlined text