

CP Consultation Responses

CP1476 'Facilitation of Incremental LLFs'



This CP Consultation was issued on 12 December 2016 as part of CPC000772, with responses invited by Friday 6 January 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
BUUK Infrastructure	2/0	Distributor
Western Power Distribution	4/0	Distributor
UK Power Networks Operations Ltd	3/0	Distributor
ESP Electricity Ltd	1/0	Distributor
TMA Data Management Ltd	0/1	Supplier Agent: HHDC, HHDA, NHHDC and NHHDA
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	2/0	Distributor
SSE Energy Supply Limited	1/0	Supplier
SmartestEnergy	1/0	Supplier
SP Distribution / SP Manweb	1/0	Distributor
Northern Powergrid Northeast LTD and Yorkshire plc	1/0	Distributor
Electricity North West Limited	1/0	Distributor

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6 January 2017

Version 1.0

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
BUUK Infrastructure	✓	✓	✗	✓
Western Power Distribution	✓	✓	✗	✓
UK Power Networks Operations Ltd	✓	✓	✓	✓
ESP Electricity Ltd	✓	✓	✗	✓
TMA Data Management Ltd	✓	✓	✓	✗
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✗	✗	✓
SmartestEnergy	✓	✓	✗	✓
SP Distribution / SP Manweb	✓	✓	✗	✓
Northern Powergrid Northeast LTD and Yorkshire plc	✓	✗	✗	✓
Electricity North West Limited	✓	✗	✗	✓

Question 1: Do you agree with the CP1476 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11			

Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	
Western Power Distribution	Yes	<p>We are happy to support this change subject to the following being addressed:</p> <p>The change proposal states that a mid-year submission of the D0265 would be required when an LLF is deleted (i.e. end-dated). The red-line documentation for the proposed incremental D0265 also supports this under 1.2. However, a revised D0265 does not need to be submitted if a LLF is end-dated, this would be carried out using the MDD change process, therefore including "end-dated" causes confusion and should be removed. A reference to a revision to an existing LLF should also be added:</p> <p>"1.2 A mid-year submission of a SVA D0265 can contain both new or revisedend-dated Line Loss Factors only. A full set of data as per 1.1 is not required and can be submitted as a partial file. File submissions for mid-year can be in the format of either a full submission or partial submission.</p> <p>A mid-year SVA D0265 submission that contains new or revisedend-dated Line Loss Factors will be automatically added to the LDSOs full portfolio of LLFs by ELEXON."</p> <p>The red-lined documentation also states "1.2 Mid-year Data File Submission of New and Revised LLFs". If "New" and "Revised" are defined terms, their definition should be included in the documentation. If they are not defined terms, they should not be capitalised.</p> <p>In addition, clarity is needed in respect of how ELEXON propose to add the revisions to Line Loss Factors. The change proposal documentation indicates that ELEXON propose to append any "additions, deletions or revisions" to the already</p>

Respondent	Response	Rationale
		approved D0265. Is the intention to add amendments to LAF values leaving the original LAF values in place or to remove the original LAF values?
UK Power Networks Operations Ltd	Yes	This change will reduce the data required when submitting additional 'mid-year' LLFCs for use in MDD.
ESP Electricity Ltd	Yes	Due to the requirement to re-submit the full D0265 data flow for mid-year amendments to LLFCs, allowing incremental submissions would reduce the administration required for both us as a distributor and ELEXON's role in ensuring data accuracy.
TMA Data Management Ltd	Yes	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	ELEXON's work load would be reduced significantly if LDNOs can submit a partial D0265 file instead of the full D0265 file when making a mid-year change. We agree with the proposed solution, but would like to receive more details on how the partial D0265 file will be 'automatically added to the LDSOs full portfolio of LLFs' (particularly in the case when an LLFC is end-dated) and the validation processes behind the manipulation of the full D0265 file.
SSE Energy Supply Limited	Yes	<p>This seems like a sensible change. On the basis that as a Supplier we will continue to be able to download a full D0265 file (following the LDSO providing only those LLFs that have changed to ELEXON), we are supportive. It is important that we continue to be able to download a complete D0265 for our settlements processes.</p> <p>We are supportive of a description of the incremental D0265 being providing on the ELEXON Portal to support those loading the change having an efficient method of understanding the revised file.</p>
SmartestEnergy	Yes	
SP Distribution / SP Manweb	Yes	It seems sensible to allow incremental sets to be created when limited information is to be added to the D0265 data flow.
Northern Powergrid Northeast LTD	Yes	Although we do appreciate that the CSAD would need to be submitted in full every time that a D0265 file is submitted.

Respondent	Response	Rationale
and Yorkshire plc		
Electricity North West Limited	Yes	We agree that the modification represents an addition to the existing process and may help streamline the mid-year LLF submission process for parties and ELEXON.

Question 2: Do you agree that the draft redlining delivers the CP1476 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	1	1	

Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	
Western Power Distribution	No	See comments in Q1.
UK Power Networks Operations Ltd	Yes	Yes we agree, although we believe that in 1.1 "line Loss Factors" should be singular as you can only have one line loss factor per settlement period.
ESP Electricity Ltd	Yes (but please note comment below)	Should reference be made (in BSCP128 red-lined Clause 1.2) to the amendment of LLFC descriptions and not just the introduction and end-dating of LLFCs?
TMA Data Management Ltd	Yes	
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	Paragraph 1.1; 'Every Line Loss Factors' Should be Line Loss Factor – singular, 'Settlement Data' should be Settlement Date.
SSE Energy Supply Limited	Yes	
SmartestEnergy	No Comment	
SP Distribution / SP Manweb	Yes	While the redlining is relatively clear, do we need to explicitly state that a new entrant to the market must always in the first instance submit a full file effective from the date they enter the market.
Northern Powergrid Northeast LTD and Yorkshire plc	Yes	See further comments in question 6 regarding the CSAD and MDD.
Electricity North West Limited	Yes	The redlined version allows companies to submit either a partial or full LLF mid-point file. This is

Respondent	Response	Rationale
		important as it allows companies (such as ourselves) who have an automated system which creates a full D0265 data flow to continue with its ongoing processes without incurring significant costs to modify systems and/or processes.

Question 3: Will CP1476 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
7	4		

Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	See comments in Q6.
Western Power Distribution	Yes	This change will be of benefit and reduce work involved in processing a mid-year D0265 submission.
UK Power Networks Operations Ltd	Yes	CP1476 will mean changes to our processes to enable the creation and submission of the single line loss factor class D0265 file.
ESP Electricity Ltd	Yes	The change will positively impact ESPE. We would only be required to upload the new/end-dated/amended LLFCs into the ELEXON LLFC mapping template for mid-year changes. No systems changes would be required. Business procedures would need amending to outline the mid-year submission changes.
TMA Data Management Ltd	Yes	There is a system impact attached to CP1476.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	We will not require any system changes to implement this change as we already have the capability to generate a full D0265 file or a partial D0265 file within our D0265 system.
SSE Energy Supply Limited	No	On the basis that as a Supplier we will continue to be able to download a full D0265 file (following the LDSO providing only those LLFs that have changed to ELEXON), there will not be any impact. It is important that we continue to be able to download a complete D0265 for our settlements processes.
SmartestEnergy	Yes	We think that CP1476 will impact our organisation in a positive way. Our system expects all LLFs within a file to have the same date. Full refreshes in the past have occasionally had different start dates for some LLFs and we have had to solve the problem manually.

Respondent	Response	Rationale
SP Distribution / SP Manweb	Yes	We will have to put in place a process that allows us to create and issue incremental changes as and when required.
Northern Powergrid Northeast LTD and Yorkshire plc	No	
Electricity North West Limited	No	The current proposal will not have an impact on our organisation if we are permitted to continue to submit a full D0265 following a mid point LLF review. Our internal systems automatically create a D0265 data flow when we modify an LLF in the system. This system produces a full D0265 flow in line with the current BSCP128 requirements. To modify this system will be expensive in the medium term, but as we are looking to introduce a new system in the future we may build this modification into the future system.

Question 4: Will your organisation incur any costs in implementing CP1476?

Summary

Yes	No	Neutral/No Comment	Other
2	9		

Responses

Respondent	Response	Rationale
BUUK Infrastructure	No	
Western Power Distribution	No	
UK Power Networks Operations Ltd	Yes	We will incur a one-off cost to implement the change in our processes. The costs will not be material and will be absorbed as part of our annual obligation to comply with BSCP128.
ESP Electricity Ltd	No	
TMA Data Management Ltd	Yes	There would be one off costs for development, testing and implementation of a low to medium nature.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	No.
SSE Energy Supply Limited	No	
SmartestEnergy	No	
SP Distribution / SP Manweb	No	
Northern Powergrid Northeast LTD and Yorkshire plc	No	
Electricity North West Limited	No	As stated above, we will not incur any additional costs so long as we are able to submit full D0265 data flows for mid-year LLF submissions.

Question 5: Do you agree with the proposed implementation approach for CP1476?

Summary

Yes	No	Neutral/No Comment	Other
10	1		

Responses

Respondent	Response	Rationale
BUUK Infrastructure	Yes	
Western Power Distribution	Yes	
UK Power Networks Operations Ltd	Yes	
ESP Electricity Ltd	Yes	Due to the fact that no system updates are required, ESPE would be able to comply with the implementation date of 29th June 2017.
TMA Data Management Ltd	No	We would prefer a November release date to ensure enough lead time between potential approval and implementation.
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	Yes	We will not require any system changes in order to facilitate a partial D0265 file and note that the generation of a partial D0265 file is optional and a full D0265 file can still be included for a valid mid-year submission.
SSE Energy Supply Limited	Yes	Though we have answered 'Yes', we are neutral because this change does not impact us as a Supplier.
SmartestEnergy	Yes	
SP Distribution / SP Manweb	Yes	
Northern Powergrid Northeast LTD and Yorkshire plc	Yes	
Electricity North West Limited	Yes	We agree with the proposed timetable as we are able to implement now.

Question 6: Do you have any further comments on CP1476?

Summary

Yes	No
4	7

Responses

Respondent	Response	Comments
BUUK Infrastructure	Yes	We are happy with this change overall and believe it is an improvement on the process however we would suggest that it is not clear if ELEXON will have a checking process in place to ensure that any new or end dated LLFs do not materially impact embedded LDSO files which mirror hosts i.e. if an end dated LLFC was mapped initially and there is no equivalent LLF but a new one has been added with different LLF values how will this be captured? We believe the occurrence of this would be minute however it should be considered to ensure data integrity.
Western Power Distribution	No	
UK Power Networks Operations Ltd	No	
ESP Electricity Ltd	No	
TMA Data Management Ltd	Yes	<p>CP1476 is a great opportunity to review the contact mechanism for D0265 update. Currently the onus is firmly on recipients to ensure they subscribe to every single Distributor to ensure they receive notification of updates to D0265 data.</p> <p>We would like to see a central contact list established by ELEXON and notifications sent to that contact list (at least one email address preferably generic) by HHDA agent whilst keeping the Portal subscription for interested parties. It would ensure that HHDA agents receive the notifications and minimise the risk of settlement data being affected.</p>
Southern Electric Power Distribution plc and Scottish Hydro Electric Power Distribution plc	No	

Respondent	Response	Comments
SSE Energy Supply Limited	No	
SmartestEnergy	Yes	It is important that all LLFs within one file should have the same start date.
SP Distribution / SP Manweb	No	
Northern Powergrid Northeast LTD and Yorkshire plc	Yes	If this change is approved then clear guidance needs to be given within the BSCP 128 that any new/removed LLFC's are to be in line with the MDD submission and that the CSAD also needs to be submitted on every occasion of the D0265.
Electricity North West Limited	No	n/a

BSCP128 Appendix 7

Respondent	Location	Comment
Western Power Distribution	1.2	If "New" and "Revised" are defined terms their definition should be included in the BSC, if not they should not be capitalised.
Western Power Distribution	1.2	First and second paragraphs – replace both occurrences of "end-dated" with "revised".
UK Power Networks Operations Ltd	Appendix 7	Should the D0265 data flow notes be removed to align with DTC CP 3497? For reference DTC CP 3497 has a 23 February 2017 implementation date?