

CP Consultation Responses

CP1492 'Causes and treatment of large Line Loss Factors'



This CP Consultation was issued on 7 August 2017 as part of CPC00780, with responses invited by 1 September 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1	Supplier
Electricity North West	1	Distributor
Northern Powergrid	1	Distributor
Power Data Associates Ltd	1	Meter Administrator
Scottish and Southern Electricity Networks	2	Distributor
Scottish Power Energy Networks	1	Distributor
SSE Energy Supply Limited	1	Supplier
UK Power Networks	3	Distributor
Western Power Distribution	4	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
Electricity North West	✗	✓	✓	✓
Northern Power Grid	✓	✓	✓	✓
Power Data Associates Limited	✓	✗	✗	✓
Scottish and Southern Electricity Networks	✓	✓	✓	✓
Scottish Power Energy Networks	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✗	✗	✓
UKPN	✓	✓	✓	✓
Western Power Distribution	✓	✗	✗	✓

Question 1: Do you agree with the CP1492 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	1

Responses

Respondent	Response	Rationale
British Gas	Yes	Correcting the LLF values by using a default value will help to reduce the distorted calculation of Group Correction Factor (GCF).
Electricity North West	Agree partly	<p>We agree with the introduction of a seventeenth principle but are not in agreement with the change to Principle 8. Altering principle 8 will make matters worse as it is the practice of calculating multiple line loss factors for site specific customers is the root cause of high LLFs</p> <p>We do not believe the change to Principle 8 requiring all LLFs to be calculated on a day and night basis is relevant to the identified issue. It is our view that the practice of calculating site specific LLFs for multiple time periods is a major factor in the issue of large LLFs. Splitting the calculation of LLFs into time periods makes it more likely that the consumption volume of a site over the period of calculation will be untypically small and so result in a large LLF due to the allocation of fixed losses for the time period over this low consumption volume. We believe that it is unlikely that a LLF calculated on a single total annual basis would result in an unjustifiably large LLF (unless perhaps there were issues with incomplete consumption data). Capping high LLFs in particular periods is not justified as it may result in the under-recovery of fixed losses.</p> <p>Customers with generic LLFs vary from those with site specific LLFs in two significant ways.</p> <ol style="list-style-type: none"> There is substantial variation within each voltage level class of generic customer. One customer may have significantly different patterns of usage of the distribution network to another customer connected at the same voltage, and so is likely to also cause a different level of losses as their usage is more or less likely to coincide with periods when the network is carrying its greatest loads. For customers in the North West of England the use of four of seasonal time periods, each with a separately calculated LLF, ensures the losses associated with a generic customer reflects their individual use of the network. Clearly for a site specific customer this is not an issue as their LLFC is unique to them and so it automatically reflects their particular unique usage of the distribution system, so there is no need for time band based LLFs for site specific

Respondent	Response	Rationale
		<p>customers.</p> <p>2. An individual generic customer will generally not have a great enough impact on the power flows on a distribution network to influence the level of losses as a whole. In contrast those customers with site specific LLFs will often be responsible for the majority of the power flows on the part of the network to which they are connected. This is relevant because it means a site specific customer will vary the losses sustained by a network if they switch their usage to different time periods (for example from day to night), but this is not the case for a single generic customer.</p> <p>For these reasons we believe day/night or additional time periods to be of value when applied to Generic customers but not if applied to Site Specific customers.</p> <p>Potentially this change could result in a site specific customer changing their pattern of usage to seek a reduction in losses that would not in reality be realised on the distribution network. Such a circumstance would arise because site specific customers are significant users of power and if they were to shift load from one time period to another it is possible this would result in a different level of losses occurring. This could not be recognised in a LLF calculated in advance on the basis of historic patterns of demand.</p> <p>STOD periods for interactive site specific customers, as oppose to annual single LLFs, can potentially distort customer LLFs as a result of a single customer's behaviour within the interactive group. This would result in unrealistic LLF changes for customers who have maintained a consistent demand or generation profile throughout the year. This can be avoided by adopting a single LLF per annum.</p> <p>Given these concerns we suggest amending Principle 8 to do the exact opposite of what has been proposed, as below (additional text shown in bold):</p> <p>"As a minimum, Generic LLFs shall be calculated separately for Day and Night. Site Specific LLFs shall be calculated on a single annual basis only."</p> <p>This amendment would reduce the risk of large LLFs resulting from calculations based on low consumption volumes. If there were still consumption or generation volumes too low to enable calculation of realistic Site Specific LLFs then the proposed Principle 17 would enable LDSOs to use a default replacement.</p> <p>The introduction of a seventeenth principle is a sensible approach but we anticipate this principle would only need to be applied in practice in exceptional circumstances if Site Specific LLFs are calculated on an annual basis.</p>

Respondent	Response	Rationale
Northern Powergrid	Yes	We joined the issue group and we are happy with the way the change proposal was developed.
Power Data Associates Limited	Yes	Resolves a clear problem identified earlier in 2017
Scottish and Southern Electricity Networks	Yes	We agree that the introduction of the 17th principle would improve on the transparency of the LLF calculations to the auditors and improve the accuracy of LLF calculations for sites with similar circumstances. However, it does not ensure consistency because there are two default processes that could be undertaken.
Scottish Power Energy Networks	Yes	We recognise that the calculation of site specific Line Loss Factors based on very low magnitudes of metered demand/generation could, in some cases, lead to a level of volatility in those LLF quantities. This could potentially lead to LLFs which don't accurately describe the losses for that site in one or more of the Seasonal Time of Day periods. The Change Proposal CP1492 addresses this by enabling DNOs to use either alternative calculation steps, or a defaulting process.
SSE Energy Supply Limited	Yes	The solution appears to be a reasonable and targeted response to mitigate the risk of high LLFs entering settlement (and any impact on customer bills) for sites where this is high generation but low consumption.
UKPN	Yes	In principle we do support this solution for the treatment for some of the high LLF values, and that this could be helpful for a small number of site specific LLF calculations. However, without some additional clarification in some areas, this solution could add to the challenges of maintaining market consistency and clear audit controls. E.g.: <ul style="list-style-type: none"> • Complicate the audit process. • Undermine the existing 16 principles with some unwanted consequences.
Western Power Distribution	Yes	This formalises what a number of the DNOs are already doing and avoids the possibility of extreme values for LLFs

Question 2: Do you agree that the draft redlining delivers the CP1492 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	2

Responses

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

Respondent	Response	Rationale
British Gas	Yes	<i>No rationale given</i>
Electricity North West	Agree Partly	<p>We believe the change to Principle 8 is wrong as explained in our response to question 1, and this particular change reinforces the cause of the problem and is not a proposed solution.</p> <p>The consultation document also states that the 17th principle aims to "ensure ... accuracy of LDSO LLF calculations". We are concerned that the option of a default calculation would in effect be a cap on LLFs that would result in systematically under calculating Site Specific LLFs. As an illustration, applying an assumed consumption of 200kVA in place of a lower level of consumption would lower the calculated LLF by allocating fixed losses over a greater number of units. This could only act to systematically lower the LLFs for affect Site Specific customers, with a consequential impact of increasing the losses needed to be allocated across Generic customers. This would be unduly discriminatory.</p> <p>We would favour the new principle allowing only a replacement process (most probably substituting relevant LLFs with equivalent generic LLFs). This would be neutral and avoid systematic bias.</p> <p>Other than this, we are in agreement with the proposed changes.</p>
Northern Powergrid	Yes	<p>Whilst we are happy with the red line text we have an observation on the detail. The text has examples of default replacement actions of substitution with a generic value or a default calculation. We appreciate these serve as examples and are not prescriptive, but it may be worth noting that where a relevant site specific site is located close to a GSP it may be more accurate to substitute a value of unity rather than a generic value.</p>
Power Data Associates Limited	Yes	<p>The red lining resolves the immediate issue, although I believe there is a need for a subsequent broader review of the LLF methodologies.</p>

Respondent	Response	Rationale
Scottish Power Energy Networks	Yes	The redlining provides sufficient general direction within the BSCP Principles to safeguard the calculation process against unduly high/low LLFs arising where profiles contain insufficiently large consumption or generation volumes.
Scottish and Southern Electricity Networks	Yes	<i>No rationale given</i>
SSE Energy Supply Limited	Yes	<i>No rationale given</i>
UKPN	Agree Partly	One initial observation: The use of the "200kVA" used in the guidance example, if it refers to consumption values might be better expressed as "200kWhs"? ('Redlining' in Appendix 1, Appendix 10, BSCP128) Further observations below.
Western Power Distribution	Yes	<i>No rationale given</i>

Question 3: Do you agree that no further clarification is required for the term 'default replacement process'?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	2

Responses

Respondent	Response	Rationale
British Gas	Yes	<i>No rationale given</i>
Electricity North West	Yes	We are in agreement with this element of the change and believe the term is sufficiently clear. Further guidance would be given in the relevant LDSO's Methodology Statement.
Northern Powergrid	Yes	Please see our answer to question 2. It may be worth including a reference to substitution for unity in addition to generic in the red line text. So the text would become: For example SVA or CVA sites where for a given SToD period instead of applying calculated LLF, a calculation was performed using a defined threshold (e.g. 200 kVA) or a substitute LLF was applied such as a generic or unity LLF. We must stress that we are happy with the existing text as it is and this suggested edit is merely an option.
Power Data Associates Limited	Yes	The support information should be made available to ELEXON at time of audit/review. The need to substitute information should be limited. There is an argument that if the values are not available then the use of site specific values should not be allowed and standard values allowed. However, the counter argument was that there are a variety of scenarios. For the purposes of this CP I defer to the minimalistic change, but see below where I suggest a wider review of the LLF calculation. It was evident in the Issue group discussion that some stakeholders were already adopting this approach, but it was not transparent. Recognising the approach and making it transparent is an improvement.
Scottish Power Energy Networks	Yes	Each DNO must publish their LLF methodology and how this meets the principles contained in BSCP128. Where appropriate, the nature of the defaulting process or alternative calculation process should be outlined in each DNO's methodology.
Scottish and Southern Electricity Networks	Partly agree	An example of the default replacement process is provided in the red-lined BSCP128. If this is the only compliant replacement process available, then perhaps this should not be an example but rather an option? We agree with the consultation paper that DNOs should define their default replacement process in their Methodology Statements.

Respondent	Response	Rationale
SSE Energy Supply Limited	Yes	<i>No rationale given</i>
UKPN	Partly agree	In as far that our process will need to reflect the use of alternative LLF calculations for some sites having a typical consumption patterns compared to their normal usage. We would like to see more clarity, in BSCP128 – Appendix 1, regarding Principle 17, about what is meant by “default replacement process” and when shall it be undertaken.
Western Power Distribution	Yes	<i>No rationale given</i>

Question 4: Do you agree that no further clarification is required for the term 'default calculation'?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	2

Responses

Respondent	Response	Rationale
British Gas	Yes	<i>No rationale given</i>
Electricity North West	Agree Partly	We agree the term is clear, but do not agree with this element of the change. This is explained in our response to question 2.
Northern Powergrid	Yes	<i>No rationale given</i>
Power Data Associates Limited	Yes	<p>The support information should be made available to ELEXON at time of audit/review. The need to substitute information should be limited. There is an argument that if the values are not available then the use of site specific values should not be allowed and standard values allowed. However, the counter argument was that there are a variety of scenarios. For the purposes of this CP I defer to the minimalistic change, but see below where I suggest a wider review of the LLF calculation.</p> <p>It was evident in the Issue group discussion that some stakeholders were already adopting this approach, but it was not transparent. Recognising the approach and making it transparent is an improvement.</p>
Scottish Power Energy Networks	Yes	<p>The nature of the defaulting process, or alternative calculation process, should be outlined in each DNO's methodology. Furthermore, where a default calculation or replacement process is used for a site, this must be documented and made available during the normal auditing process.</p> <p>Consequently, it would be appropriate for Elexon to update the format of the CSAD submission table to include whether each SToD LLF is a Generic, Site Specific or "Defaulted" calculation. At present, this only listed per site, rather than per SToD.</p>
Scottish and Southern Electricity Networks	Partly Agree	As above - with relation to default calculation process.
SSE Energy Supply Limited	Yes	<i>No rationale given</i>

Respondent	Response	Rationale
UKPN	No	We would anticipate some adjustment to the calculations methodology. Ideally, we would like to see more clarity about what is meant by "default calculation" E.g. could the "default calculation" include the use of generic values, or previously calculated values? Provision of assumed consumption/generation data where low values exist?
Western Power Distribution	Yes	<i>No rationale given</i>

Question 5: Do you agree with the word 'large' in the redlined text is suitable? If you disagree, what would be your suggested alternative?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	<i>No rationale given</i>
Electricity North Wes	Yes	We are in agreement with this element of the change. We would expect that the term 'large' would be defined appropriately in the relevant LDSO's Methodology Statement.
Northern Powergrid	Yes	<i>No rationale given</i>
Power Data Associates Limited	Neutral	I have no view on this question
Scottish Power Energy Networks	Yes	We feel that removal of the word 'large' would broaden the meaning of this clause. A distinction should be retained between being unable to calculate an LLF due to having 'no data' and limitations in the calculations caused by the metering volumes being low in magnitude. For example, new EHV customers are placed on Generic LLFs until there is sufficient metering data (1 complete year) to enable calculation of a site specific LLF for that site. Removal of the word 'large' would imply that the default calculation or replacement process should be undertaken even if the first full year of usage data is available.
Scottish and Southern Electricity Networks	Yes	Where the actual usage profile for a given site contains insufficiently large consumption or generation volumes that do not meet the de minimis requirements to enable calculation of a realistic Site Specific LLFs then a default calculation, or default replacement process shall be undertaken.
SSE Energy Supply Limited	Yes	<i>No rationale given</i>
UKPN	No	I would possibly see the values as being 'high' or 'low' but not large.
Western Power Distribution	Yes	<i>No rationale given</i>

Question 6: Do you believe that changing 'Generic' to 'all' will have a material impact on LDSOs?

Summary

Yes	No	Neutral/No Comment	Other
2	5	2	0

Responses

Respondent	Response	Rationale
British Gas	No	<i>No rationale given</i>
Electricity North West	Yes	This change would have a material impact on us as an LDSO. This change would result in extra resource being required for us as a DNO to adjust our processes to move from calculating a single annual LLF to running at least two LLF calculations for each Site Specific LLFC. This will have implications for the production of input data to the calculations and will also require multiple models to be run. We estimate that this would more than double the resources needed to calculate the site specific LLFs. The consultation document indicates that responses to this question should give views on whether this is an appropriate change. This is not an appropriate change. We have given our reasoning in our response to question 1.
Northern Powergrid	No	<i>No rationale given</i>
Power Data Associates Limited	No	The overall calculation should be the same. The impact is to ensure more granular values. Most DNOs are already publishing day/night (or actually SToD) values rather than single values only. This harmonises the approach across all Distributors.
Scottish Power Energy Networks	Neutral	This is outside the remit of Issue 65. It is unlikely to impact SPEN as the definition of SToD periods for Site Specific and Generic LLFs are the same.
Scottish and Southern Electricity Networks	No	We understand that all DNOs use at least four Season Time of Day periods, with LDNOs mirroring these – so there should be no impact.
SSE Energy Supply Limited	Neutral	<i>No response given</i>
UKPN	Yes	I utilise both our LLF Calculations Methodology and "Constructing Aggregation Rules – Central Volume" (Guidance Published by Elexon) to provide guidance for the calculation of 'CVA Fixed Loss Constants'. Given that the 'CVA Fixed Loss constant' is a single value and not a set of values, we would request that this text

Respondent	Response	Rationale
		remains unchanged. While the scope of BSCP128, as it currently stands, does not include Fixed Loss Constants as they are used in CVA aggregation rules, our calculations methodology needs to remain suitable for calculations for the fixed loss constant and therefore it could be problematic to incorporate the revised principle as worded.
Western Power Distribution	No	<i>No rationale given</i>

Question 7: Will CP1492 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

Responses

Respondent	Response	Rationale
British Gas	No	<i>No rationale given</i>
Electricity North West	Yes	<p>CP1492 will require updates to our Code of Practice and Methodology Statement. However, annual review of these documents is a routine business process and no additional resource will be required.</p> <p>The change to Principle 8 would require extra resource to be committed to the calculation of site specific LLFs. Spending resources to ensure our processes split site specific LLFs across time periods would provide no identifiable benefit to our customers or the industry.</p>
Northern Powergrid	Yes	<p>It will change our LLF production process very slightly to include an additional check and decision point for any relevant site at say 10 minutes per site. It is important to note that LDSOs already apply the same/ similar arrangements to newly connected sites and sites that reduce consumption prior to closing down/disconnection. The impact cost should therefore be negligible although it cannot be calculated as we do not know how many relevant sites will arise in the future.</p>
Power Data Associates Limited	No	<i>No rationale given</i>
Scottish Power Energy Networks	Yes	<i>Confidential response provided</i>
Scottish and Southern Electricity Networks	Yes	<p>We already have a default calculation process in place (as published in our Methodology Statement) and so we will not require any changes to systems, documents or processes apart from confirming how to document the default calculation process for auditing purposes. We anticipate that the change will require 1-2 personnel days to implement.</p>
SSE Energy Supply Limited	No	<p>No direct impact in terms of implementation, but there is a positive impact inasmuch that we and our customers should not be exposed to high LLFs in high generation but low consumption situations.</p>
UKPN	Yes	<p>As a minimum, we would expect to have to update our LLF Calculations Methodology.</p>

Respondent	Response	Rationale
		Additionally, as mentioned above, while the scope of BSCP128, as it currently stands, does not include Fixed Loss Constants as they are used in CVA aggregation rules, and our calculations methodology needs to remain suitable for calculations for the fixed loss constant and therefore it could be problematic to incorporate the revised principle as worded where the wording of 'Generic' is changed to 'All'.
Western Power Distribution	No	This change reflects our existing process

Question 8: Will your organisation incur any costs in implementing CP1492?

Summary

Yes	No	Neutral/No Comment	Other
3	6	0	0

Responses

Respondent	Response	Rationale
British Gas	No	<i>No rationale given</i>
Electricity North West	Yes	We anticipate additional resource being required to implement CP1492 as currently drafted. This would be as a result of additional work required to produce Site Specific LLFs for both day and night (as a minimum).
Northern Powergrid	Yes	Negligible ongoing costs please see our response to question 7.
Power Data Associates Limited	No	<i>No rationale given</i>
Scottish Power Energy Networks	No	<i>Confidential response provided</i>
Scottish and Southern Electricity Networks	No	As we already operate a default calculation process, we will not incur any costs in implementing CP1492.
SSE Energy Supply Limited	No	<i>No rationale given</i>
UKPN	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.
Western Power Distribution	No	<i>No rationale given</i>

Question 9: Do you agree with the proposed implementation approach for CP1492?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	<i>No rationale given</i>
Electricity North West	Yes	We agree with the implementation approach (the date gives us sufficient time to update our processes to comply with the change).
Northern Powergrid	Yes	<i>No rationale given</i>
Power Data Associates Limited	Yes	Having identified the problem, it should be resolved as soon as possible. A Feb 2018 implementation allows values for 2019/20 to be approved using this revised approach
Scottish Power Energy Networks	Yes	Implementation of CP1492 within SPEN processes can be accommodated within the timescales outlined.
Scottish and Southern Electricity Networks	Yes	We agree with the implementation date and note that the change would be applicable to LLF calculations from 2019/20 onwards.
SSE Energy Supply Limited	Yes	<i>No rationale given</i>
UKPN	Yes	For this implementation, we would like to see some further clarity provided with the terms 'default process' and 'default calculation'. We also think, potentially, there could be an issue surrounding the change of the wording 'Generic' to 'All' with regards to CVA constants using the LLF calculations Methodology as an auditable document.
Western Power Distribution	Yes	This change should be implemented as soon as possible but it is too late for the 2018-19 LLF submissions due September 2017

Question 10: Do you have any further comments on CP1492?

Summary

Yes	No
1	8

Responses

Respondent	Response	Comments
Power Data Associates Limited	Yes	<p>I am concerned, and I raised this with the Issues 65 group in March that different Distributors have different approaches to determine the LLFs. I am uncertain why these approaches are so different and whether these differences should be eliminated into a common approach. I have been advised that this is not a DCUSA issue but a BSC issues, as this is within scope of BSCP128.</p> <p>The DNO statements, such as the Yorkshire statement refers back to the Pool MDC (Metering and Data Committee?) and 1995 documents. This may or may not be still pertinent. Either way the statements and methodology should be written based on 'todays' view of the world and not refer back to documents and decisions made 20+ years ago which are inaccessible to most reviewers (including myself).</p> <p>Added to which the ISG comment on CP1420 (in 2015) "The ISG agreed with ELEXON's view with an ISG Member believing that the fundamentals of the calculation methodology need to be reviewed."</p> <p>I agree with this ISG member and believe the Distributor policies should be reviewed and a common approach adopted. The statements should also cease to refer to historic documents from the 1990s, the logic may continue exactly the same, but the industry has changed since the 1990s and therefore whatever was 'assumed' then, may no longer be relevant.</p>

BSCP128

Respondent	Location	Comment
Electricity Northwest	Paragraph 3.1 Principle 8	8. As a minimum, Generic LLFs shall be calculated separately for Day and Night. Site Specific LLFs shall be calculated on a single annual basis only.
Electricity Northwest	Paragraph 3.1 Principle 17	17. Where the usage profile for a given site contains insufficiently large consumption or generation volumes to enable calculation of realistic Site Specific LLFs then a default replacement process shall be undertaken.
Electricity Northwest	Paragraph 3.5 point 7(f)	Amend to reflect above refinement of the proposed principle 17.
Northern Powergrid	Paragraph 3.5 point 7(f)	Optional inclusion of a reference to a unity LLF. Please note that we have no strong preference to include. (ii) if for a given SToD period/periods <i>generic or unity</i> LLF values were applied.
Scottish and Southern Electricity Networks	Paragraph 3.1 Principle 17	Where the actual usage profile for a given site contains insufficiently large consumption or generation volumes that do not meet the de minimis requirements to enable calculation of a realistic Site Specific LLFs then a default calculation, or default replacement process shall be undertaken.
UKPN	Paragraph 3.1 Principle 8	We also think, potentially, there could be an issue surrounding the change of the wording 'Generic' to 'All' with regards to CVA constants using the LLF calculations Methodology as an auditable document.
UKPN	Paragraph 3.1 Principle 17	We are unclear about the use of the term 'large', perhaps 'high' or 'low' consumption could skew the calculated losses values?
UKPN	Para 7. Examples.	Clarity concerning the guidance note and the use of the term 'kVA', should it be 'kWh's'?

BSCP128 Appendix 1

Respondent	Location	Comment
Electricity North West	1.3 Principles 8 and 17	Update to reflect changes to principles 8 and 17 suggested above.
UKPN	1.3 Principle 8	We also think, potentially, there could be an issue surrounding the change of the wording 'Generic' to 'All' with regards to CVA constants using the LLF calculations Methodology as an auditable document.
UKPN	1.3 Principle 17	We are unclear about the use of the term 'large', perhaps 'high' or 'low' consumption could skew the calculated losses?

BSCP128 Appendix 3

Respondent	Location	Comment
Electricity North West	Paragraph 1.3 point 15	Update to reflect changes to principle 17 suggested above.
Northern Powergrid	Paragraph 1.3 point 15	<p>Suggested text: <i>For example SVA or CVA sites where for a given SToD period instead of applying calculated LLF, a calculation was performed using a defined threshold (e.g. 200 kVA) or a substitute LLF was applied such as a generic or unity LLF.</i></p> <p>Again this is an optional suggestion only.</p>
Scottish and Southern Electricity Networks	Paragraph 1.3 point 15	Some further clarity on what the DNO is expected to document as part of the default calculation/replacement process would be useful i.e. which LLFs are impacted, justification or any other information? Would it be useful to document the information in the CSAD-Appendix 5?
UKPN	Paragraph 1.3 point 15	We are unclear about the use of the term 'large', perhaps 'high' or 'low' consumption could skew the calculated losses?

BSCP128 Appendix 10

Respondent	Location	Comment
Electricity North West	Paragraph 1.3 point 12	Update to reflect changes to principle 17 suggested above.
Northern Powergrid	Paragraph 1.3 point 12	<p>Suggested text: <i>For example SVA or CVA sites where for a given SToD period instead of applying calculated LLF, a calculation was performed using a defined threshold (e.g. 200 kVA) or a substitute LLF was applied such as a generic or unity LLF.</i></p> <p>Again this is an optional suggestion only.</p>
UKPN	Paragraph 1.3 point 12	Clarity concerning the guidance note and the use of the term 'kVA', should it be 'kWhs'?