



Change Proposal Circular

CPC00692: Impact Assessment of DCP0048, CP1343 and CP1344

Responses for DCP0048 'Migration of interface between National Grid and BMRA/SAA from CSV to XML file format'



Any Questions

If you have any queries, please contact: CCC@elexon.co.uk.

Or contact: BSCP40 Change Process Task Leader 020 7380 4135 stuart.holmes@elexon.co.uk.

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Neutral	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
CE Electric UK (YEDL & NEDL)	LDSO	Neutral	No	-
Accenture Services Limited (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-

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Summary of Responses				
npower	Supplier & Supplier Agents	Neutral	No	180
E.ON Energy Solutions	HH & NHH MOA, NHH DC-DA	Neutral	No	-
Scottish & Southern Energy Plc	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	-
GDF SUEZ Energy UK	Supplier	Neutral	No	-
E.ON UK	Supplier	No	Yes	?

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Independent Power Networks Limited	Neutral	No	-
TMA Data Management Ltd	Yes	No	Agree change comment - The move to XML format from CSV format is necessary in order to increase the potential for improvement and innovation
CE Electric UK	Neutral	No	-
Accenture Services Limited (for and on behalf of Scottish Power)	Yes	No	-
npower	Neutral	No	Notice required to implement - Although initial analysis of this change indicated that there will be no impact on npower directly, we would not expect any changes within the industry to be implemented without a lead time of at least six months. Associated costs - as this change does not impact npower, no costs can be attributed
E.ON Energy Solutions	Neutral	No	-
Scottish & Southern Energy Plc	Yes	No	Do you have any other comments or suggestions for alternative solutions? As the proposed solution of Option 3 does not impact any BSC Parties and no changes to the format of the data that BSC parties receive, we do not, therefore, expect any cost or system implications. However, if this option is progressed we would want to understand the costs that Elexon would incur.

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Detailed Impact Assessment Responses

GDF SUEZ Energy UK	Neutral	No	-
E.ON UK	No	Yes	<p>Agree change comment - Our preference remains Option 1, to continue with CSV files, that can be easily accessed in Excel, and not embark upon a phased migration project that seems likely to involve some duplications of work and costs to Parties. That higher long-term IT costs would result from Option 1 is not certain. However Option 3 to develop and maintain new XML interfaces in parallel to the current CSV format would be less efficient than Options 1 or 2, and effectively re-opening the project to phase migration to XML at suitable opportunities, incur further costs. We note particularly the statement that the XML interface initially developed and maintained may have to be revisited: 'Depending on the level of input Elexon is able to make prior to EBS go-live, the XML interface implemented on EBS may be a generic one from the vendor which may not fully meet BMRA/SAA requirements – this could result in additional costs in the future for National Grid and/or BSC Parties'.</p> <p>Thus the recommended Option 3 seems more inefficient and likely to result in higher costs than Option 1, or Option 2 to migrate the interfaces at EBS go-live.</p> <p>Please state what the impact is – as above.</p>



About Severity Codes

H (High):
Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Responses for CP1343 'Appropriate Line Loss Factors for High Voltage Customers metered at primary substations'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Yes	Yes	See comment
Electricity North West Limited	DNO	Yes	Yes	See comment
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
CE Electric UK (YEDL & NEDL)	LDSO	Yes	Yes	30

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Summary of Responses				
Accenture Services Limited (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-
Western Power Distribution	Distributor, MOA	Yes	Yes	-
npower	Supplier & Supplier Agents	Neutral	No	180
E.ON Energy Solutions	HH & NHH MOA, NHH DC-DA	Neutral	No	-
Scottish & Southern Energy Plc	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	-
GDF SUEZ Energy UK	Supplier	Yes	Yes	120
E.ON UK	Supplier	Yes	No	-

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Independent Power Networks Limited	Yes	Yes	<p>For which role is your organisation impacted? LDSO</p> <p>What is the impact? IPNL is supportive of the change as IPNL has a number of HVS customers and the proposal will enable IPNL to use generic LLFs on these customers as currently applied rather than having to generate site specific LLFs as there is currently a shortage of available codes across all DNOs.</p> <p>Notice required to implement - As IPNL operates in multiple DNO regions, IPNL would require the same development time as the DNOs themselves.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
Electricity North West Limited	Yes	Yes	<p>Agree change comment - This change ensures that there is no consequential impact on LLFs when EDCM is implemented due to the changes to the definitions associated with HVS.</p> <p>For which role is your organisation impacted? Distributor</p> <p>What is the impact? We agree with the impact identified within the change proposal. Without</p>

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Detailed Impact Assessment Responses

			<p>such an amendment not only would we have to create site specific LLFs and the impact this may have on customers and suppliers but we would also have to change our IT applications associated with MPAN generation and billing of suppliers.</p> <p>Notice required to implement - This is considered a minor but important change and as such would form part of next year's submission if approved in line with the suggested timetable.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No. It would have quite the reverse.</p> <p>Associated Costs - There are no consequential costs of implementing such a change. It is more the reverse in that there would be a significant IT and business process cost by not implementing it.</p>
TMA Data Management Ltd	Yes	No	-
CE Electric UK	Yes	Yes	<p>Agree change comment - This proposed change would minimise disruption to HV customers metered at primary substations (HVsub customers) who may become subject to a new EHV use of system charging methodology and their suppliers. It does not sacrifice the accuracy of settlements with regards to losses because the physical position of these customers on the network is not changing.</p> <p>For which role is your organisation impacted? As an LDSO - required to calculate line loss factors under BSCP128.</p> <p>What is the impact? Minimal. The change proposal would require us to check the definitions of voltage levels within our Line Loss Factor (LLF) methodology prior to submission which we would do anyway.</p> <p>Notice required to implement - We would not need much notice for us to implement this change if it were approved, although 30 days notice would be reasonable.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No. We would be able to continue to apply HVS generic losses to HV customers metered at primary substations.</p> <p>Associated Costs - Envisaged as minimal.</p> <p>Any other comments - We think it is important that distribution network operators continue to have the option of applying generic HVS line loss factors to HVsub customer in order to minimise unnecessary administration, minimise cost and reduce unnecessary disturbance for HVS customers and their suppliers.</p> <p>We believe the change proposal demonstrates a pragmatic approach to managing and applying appropriate line loss factors for HV sub customers if or when such customers move from the CDCM (the use of system charging methodology for LV and HV customers) to the EDCM (EHV use of system charging methodology).</p>

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Detailed Impact Assessment Responses			
			<p>Any future change that required LDSOs to calculate site specific line loss factors for current HVsub customers is likely to have the following consequences:</p> <ul style="list-style-type: none"> • HVsub customers moving to the EDCM are likely to face disturbance in the form of revised use of system charges any change to their LLFs would cause further (and unnecessary) disturbance; and • Significant unnecessary additional costs for LDSOs.
Accenture Services Limited (for and on behalf of Scottish Power)	Yes	No	<p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact is expected, we would still expect to meet the timelines as identified in BSCP 128.</p> <p>Associated costs - We do not envisage any additional costs at this time.</p>
Western Power Distribution	Yes	Yes	<p>For which role is your organisation impacted? Distributor</p> <p>What is the impact? This CP confirms the approach we need to take when calculating LAFs for these customers</p> <p>Notice required to implement - We already operate in the manner required</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs – no cost</p>
npower	Neutral	No	<p>Notice required to implement - Although initial analysis of this change indicated that there will be no impact on npower directly, we would not expect any changes within the industry to be implemented without a lead time of at least six months.</p>
E.ON Energy Solutions	Neutral	No	-
Scottish & Southern Energy Plc	Yes	No	-
GDF SUEZ Energy UK	Yes	Yes	<p>Agree change comment - GDF SUEZ Energy UK supports this change on the basis that it provides a simpler method for calculating losses that apply to HV Substation customers than that proposed under EDCM. This helps reduce the increases in cost and complexity of supplying such customers under EDCM.</p> <p>For which role is your organisation impacted? Supplier</p> <p>What is the impact? Pricing and Billing Systems that use the LLF will be impacted by the changes under EDCM and this change will reduce the EDCM impacts on systems.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
E.ON UK	Yes	No	<p>Agree change comment - On the face of it, it may seem that more site specific LLFs would make settlement more accurate, this solution at worst maintains the Status Quo. There may be a</p>

Detailed Impact Assessment Responses

			marginal benefit to settlement but this would seem to be outweighed by the disruption to customers already facing changes due to moving from EDCM to CDCM. This would seem a pragmatic solution by using the generic LLF for these customers to look like a site specific LLF, where the Distributor believes it is appropriate.
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No comments received on the redline text

Responses for CP1344 'New PARMS Serials: Further Amendments to BSCP533 and BSCP533 Appendices'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Independent Power Networks Limited	LDSO, SMRA, UMSO	Neutral	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	-
CE Electric UK (YEDL & NEDL)	LDSO	Neutral	No	-
Accenture Services Limited (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-
Western Power Distribution	Distributor, MOA	Yes	Yes	90
npower	Supplier & Supplier Agents	Yes	Yes	-
E.ON Energy Solutions	HH & NHH MOA, NHH DC-DA	Yes	Yes	-



About Severity Codes

H (High):
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M (Medium):
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L (Low):
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Summary of Responses

Scottish & Southern Energy Plc	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	No	-
GDF SUEZ Energy UK	Supplier	Yes	Yes	-
E.ON UK	Supplier	Yes	No	-

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Independent Power Networks Limited	Neutral	No	-
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? HHDC and NHHDC</p> <p>What is the impact? Software impact</p> <p>Notice required to implement – There is no additional change days required if CP1344 is approved promptly and implemented at the same time as CP1334.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? As stated above CP1344 must be implemented at the same time as CP1334</p> <p>Associated Costs – No additional cost to existing CP1334 costs.</p> <p>Question 6 – No scenarios identified</p>
CE Electric UK	Neutral	No	-
Accenture Services Limited (for and on behalf of Scottish Power)	Yes	No	<p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
Western Power Distribution	Yes	Yes	<p>For which role is your organisation impacted? MOA</p> <p>What is the impact? We need to code PARMS scripts in line with these changes to the original requirements</p> <p>Notice required to implement – Provided these changes are approved at the next SVG and we have sight of the final requirements by end of March then we can still meet the July 1st implementation date.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No, provided these are the final changes to the requirements and they are agreed</p>

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			<p>by SVG in March</p> <p>Associated Costs – No additional cost as we have delayed starting work on the new July 01 serials until we receive confirmation of the outcome of this CP.</p>
npower	Yes	Yes	<p>For which role is your organisation impacted? Our Supplier Agents will be impacted by the PARMS Serial changes (HHDC, HHDA, HHMO, NHHDC, NHHDA and NHHMO).</p> <p>What is the impact? Currently all our Supplier Agents provide PARMS reporting in-line with the timescales stipulated within the relevant Code Subsidiary Documents. Changes to these documents through CP1334 result in reporting changes.</p> <p>Notice required to implement – N/A – this CP provides clarity around implementing CP1334 and we will be implementing the change in line with the timescales stipulated within that CP (June 2011 release).</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? this CP provides clarity around implementing CP1334 and any adverse impacts to our business would have been highlighted in our response to that CP.</p> <p>Associated Costs – this CP provides clarity around implementing CP1334 and any costs associated with implementation would have been highlighted in our response to that CP.</p> <p>Question 6 – Erroneous flows would be identified as flows that are sent as duplicates or where we may not be the appointed Agent at the time of the effective from date within the flow.</p> <p>Question 7 – Discussions have taken place between npower and ELEXON since receiving this CP for impact assessment around the suitability of HM14. We are happy with the response given and fully understand ELEXON's point of view around this serial. However, would it be possible for ELEXON to add some wording to this serial that would provide clarity that Meter Operator's performance maybe adversely affected by delays out of their control?</p> <p>The clock starts on this serial once a fault has been identified and stops once the results of the fault investigation have been sent to the Supplier / HHDC. However, there maybe a delay between the fault being identified and it being reported to the Meter Operator which would impact the Meter Operator's ability to respond to the investigation within 15 working days.</p>
E.ON Energy Solutions	Yes	Yes	<p>For which role is your organisation impacted? HH & NHH MOA NHH DC-DA</p> <p>What is the impact? Clarification of the requirements of the new PARMS reporting mechanism.</p> <p>Notice required to implement – Change will not impact the timescale associated with the development of the revised PARMS reporting suite.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated Costs – No costs specifically attributable to this change.</p> <p>Question 6 – There will be many varieties of erroneous flow but the key categories include the following.</p>

Detailed Impact Assessment Responses			
			<ul style="list-style-type: none"> Flows sent in error to non appointed participants Duplicate flows Incorrectly completed flows. Flows for which it is impossible to respond e.g. an D0170 sent for MTDs for a site that has never had metering installed.
Scottish & Southern Energy Plc	Yes	No	<p>Question 6 – Identifying flows to be erroneous is an unknown and based on assumptions. Guidelines on the interpretation would be useful. Some scenarios are, incorrect agent appointment, data cleansing exercise carried out by suppliers or suppliers’ agents or Erroneous Transfers.</p>
GDF SUEZ Energy UK	Yes	Yes	<p>Agree change comment – Provides sensible clarifications on the process and removes inconsistencies</p> <p>For which role is your organisation impacted? Supplier</p> <p>What is the impact? Clarification on how our agents will be producing their PARMs reports following the introduction of the new serials in July 2011</p> <p>Notice required to implement – No impact on systems over that of CP1334.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No Associated Costs – No cost.</p> <p>Question 6 – We would class an erroneous flow as a flow that has been sent unnecessarily or a flow that has been sent with either the incorrect information or in the incorrect format. For the flows that a supplier would send that would affect the new serials (D0155 and D0148) the major causes for this would be unforeseen user or system error.</p>
E.ON UK	Yes	No	<p>For which role is your organisation impacted? Supplier</p> <p>Question 6 - After consideration E.ON’s view is that there are only a few circumstances where a flow should not be counted in the PARMs reporting.</p> <p>During all of our processes where a data flow is provided to an agent requesting information or making an appointment, E.ON would expect a return in all instances within the given SLA. If the returning flow is outside of the SLA then it should be included within the PARMs counts.</p> <p>The only instance of E.ON receiving erroneous / duplicate flows is where a user has requested the flows to be resent without allowing time for the original flows to be provided. Although these flows are duplicate we wouldn’t consider them as erroneous.</p> <p>Where a data flow is superseded by a later flow with an amendment to a single piece of information, we would again not consider this to be erroneous as long as the information within the original flow was valid at the time. For example a D0150 provided to us by the MO held a Valid MDD combination. If at a later point the SSC is changed E.ON would have received the original flow in confidence that it was correct.</p>

Detailed Impact Assessment Responses

			When considering discounting pending counts, flows that are no longer required should be disregarded. For example If an incorrect D0148 is sent to an MO, and then immediately replaced with a revised D0148, we would only expect the pending count of the D0150 / D0168 to be against the latest flow and not both D0148s.
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About Severity Codes

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M (Medium):
Matter of substance, but not high.

L (Low):
Minor error but document's intention is clear.

Comments on the redline text

No.	Organisation	Document name	Location	Severity Code	Comments
1	TMA Data Management Ltd	CP1344_BSCP533_Appx_B_v0.4	P9	L	"Erroneous flows must still be submitted against for those Serials which measure timeliness. This is because even if it was erroneous the sending of the data flow should still not be late" I suggest: "Erroneous flows must still be submitted for those Serials measuring timeliness. This is because even if it was erroneous, the sending of the data flow should not be late"
1	Accenture Services Limited (for and on behalf of Scottish Power)	BSCP533 App A	Front page	M	The Date should be updated from '1 November 2010' to '1 July 2011'.
2	Accenture Services Limited (for and on behalf of Scottish Power)	BSCP533 App A	Page 2	M	The Date should be updated from '1 November 2010' to '1 July 2011'.

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