



## Change Proposal Circular

### CPC00697: Impact Assessment of CP1347 and CP1348

Responses for CP1347 'Enhancements to SVAA Process for Distribution of Consumption Data for Embedded Network'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Good Energy	Supplier	Neutral	No	-
E.ON	Supplier	Yes	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
Electricity North West Limited	Distributor	Yes	Yes	180
CE Electric UK (NEDL and YEDL)	DNO	Yes	Yes	180
London Power Networks plc, Eastern Power Networks plc, Eastern Power Networks plc, UK Power Networks (Operations) Ltd, UK Power Networks (Operations) Ltd	Distributor	Yes	Yes	90
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	Yes	90



#### Any Questions

If you have any queries, please contact:

[CCC@elexon.co.uk](mailto:CCC@elexon.co.uk)

Or contact:

**BSCP40 Change  
Process Task Leader  
020 7380 1435**

## Summary of Responses

Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd				
IBM for and on behalf of ScottishPower	Distributor	Yes	Yes	30
Western Power Distribution	Distributor	Yes	Yes	30

## Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
Good Energy	Neutral	No	<b>P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> Given that we are not impacted we don't expect to incur costs
E.ON	Yes	No	<b>Lead time comment -</b> No System Changes required <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No <b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> Yes
TMA Data Management Ltd	Yes	No	<b>Agree change comment –</b> Using the DTN is preferable to any other method of data transmission. <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No <b>Associated costs comment –</b> No associated cost <b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> Yes, the cost of implementing CP1347 should be recovered from all LDSO's as they are the only parties benefiting from this change.
Electricity North West	Yes	Yes	<b>Agree change comment –</b> These changes are necessary to deliver the proposed changes to

CPC00697

2 June 2011

Version 1.0

Page 2 of 8

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## Detailed Impact Assessment Responses

Limited			<p>the DTC.</p> <p><b>For which role is your organisation impacted?</b> Distributor</p> <p><b>Please state what the impact is</b> – Amendment of the processes associated with the delivery of P246 i.e. receipt of data over the DTN thereby necessitating changes to three IT systems.</p> <p><b>Lead time comment</b> - We require a minimum lead time of six months due to the changes to IT systems and the current IT refresh programme we are undertaking within our company which takes us to September of this year.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes. The release in November would not give us sufficient time to amend the systems due to the workload on our IT refresh programme. We would have to introduce a business workaround since the current process of receiving the data via the P246 process would not be stopped.</p> <p><b>Associated costs comment</b> – The impact will be minor on two systems and medium on the third.</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> - Yes. This change benefits only distributors</p>
CE Electric UK (NEDL and YEDL)	Yes	Yes	<p><b>Agree change comment</b> – We agree with the change however we will need to carry out a high proportion of development work to our existing Supercustomer billing system in order to accommodate the proposals set out within CP1347.</p> <p><b>For which role is your organisation impacted?</b> DNO</p> <p><b>Please state what the impact is</b> – Further adaptation of our existing Supercustomer billing system to replace the interim handing of P246 data flows with full processing of the new IDNO DUoS report (D0030 equivalent), generation of daily IDNO statements (D0242 equivalent), and management of LLFC mapping in accordance with the proposed DCUSA working practice. Configuration changes to our DTN gateway and data flow routing system to control transmission of new DTC data flows.</p> <p><b>Lead time comment</b> - 180 days from authorisation of change request to our internal IT service provider. Our internal IT service provider will require time to prepare their impact assessment in response to our submitted change request with them. We would require the MRA DTC changes</p>

CPC00697

2 June 2011

Version 1.0

Page 3 of 8

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## Detailed Impact Assessment Responses

			<p>to have been raised and agreed, and the DCUSA working practice also issued in order that we can obtain a fixed price for the development work.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes. CE do not expect to have completed implementation of the necessary changes to the existing Supercustomer billing system in time for the November 2011 release. If the 'big-bang' cutover means that the provision of the interim P246 data flows by emailed zip archive will cease, this means we will be unable to bill IDNOs for non-half hour DUoS charges until we have completed the necessary billing system development work and supporting process changes.</p> <p><b>Associated costs comment</b> – Costs are expected to be between £20k and £35k.</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> - Yes</p> <p><b>Any other comments</b> - In response to question four, we would still like the ability to receive the P246 data flows by emailed zip file whilst we carry out the necessary development work for moving to the enduring solution. Therefore, we would prefer the implementation date to be changed to a later date in order to accommodate the timescales for the necessary approval process and IT development work that is required.</p> <p>In addition, there seems to be no mention of the daily IDNO statements (D0242 equivalent) within CP1247, therefore is this still be part of this proposal as we have included this within our response.</p>
London Power Networks plc, Eastern Power Networks plc, Eastern Power Networks plc, UK Power Networks (Operations) Ltd, UK Power Networks (Operations) Ltd	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Distributor</p> <p><b>Please state what the impact is</b> – Amend billing processes and procedures along with changes to the billing systems</p> <p><b>Lead time comment</b> - 90 days would be acceptable</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> November 2011 is an acceptable lead time for such a change</p> <p><b>Associated costs comment</b> – Although we would incur costs, these would be minimal</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal</b></p>

CPC00697

2 June 2011

Version 1.0

Page 4 of 8

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## Detailed Impact Assessment Responses

			<p><b>proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> We are agreeable to the way costs are allocated for this change</p> <p><b>Any other comments</b> - We would prefer to see all IDNO sites included in the file, even if they charge levied for these sites is £0. This is largely because if they are excluded although the IDNO will not receive a charge, the DNO will not be able to factor these sites into any losses calculations. Also the DNO would be reliant on the IDNO to have confirmed correctly to Elexon the sites to exclude from any calculations, without having the chance to undependably verify the data.</p>
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Distribution</p> <p><b>Please state what the impact is</b> – Changes to our systems</p> <p><b>Associated costs comment</b> – Minimal Cost</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> Yes</p>
IBM for and on behalf of ScottishPower	Yes	Yes	<p><b>For which role is your organisation impacted?</b> Distributor</p> <p><b>Please state what the impact is</b> – If the flow is similar to the existing D0030 flow then we would expect to see a minimal impact on our current processes.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Given that market participants have differing timescales for implementing system changes, with the minimum period of 6 months being quoted in the past, a November 2011 implementation date seems tight. While we believe that we can meet this implementation date, dependant on other responses, a February 2012 implementation date may be more practical.</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> We agree that this cost should be treated as a P246 Implementation cost.</p>
Western Power Distribution	Yes	Yes	<p><b>For which role is your organisation impacted?</b> LDSO</p> <p><b>Please state what the impact is</b> – Improves the process for loading DUoS data; DTN gateway</p>

CPC00697

2 June 2011

Version 1.0

Page 5 of 8

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## Detailed Impact Assessment Responses

			<p>and flow routing processes will need to be changed.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – &lt;£500 IT costs</p> <p><b>Do you agree that the cost of SVAA implementing this change should be treated as a P246 Implementation Cost (which means it will be recovered from all LDSOs in equal proportion, rather than being recovered from Suppliers and Generators like other BSC costs)?</b> Yes</p>
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### 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.

## Comments on the redline text

No.	Organisation	Document name	Location	Severity Code	Comments
1	Electricity North West Limited	BSCP508	3.2.1.4 notes	M	It would be helpful to understand the process of approval of requesting exceptions of any directly connected networks which results in the data not being sent to the Host LDSO. The current wording would mean any requests for exclusion would be accepted.

CPC00697

2 June 2011

Version 1.0

Page 6 of 8

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## Responses for CP1348 'Supplier Charges following implementation of CP1334 "New PARMS Serials"'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Good Energy	Supplier	Yes	Yes	60 <sup>1</sup>
E.On	Supplier	Yes	No	-
Electricity North West Limited	Distributor	Neutral	No	-
London Power Networks plc, Eastern Power Networks plc, Eastern Power Networks plc, UK Power Networks (Operations) Ltd, UK Power Networks (Operations) Ltd	Distributor	Neutral	No	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	Yes	-
IBM for and on behalf of ScottishPower	Distributor	Yes	No	-

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Good Energy	Yes	Yes	<b>For which role is your organisation impacted?</b> Supplier <b>Please state what the impact is</b> - Process of removing obsolete

<sup>1</sup> ELEXON contacted Good Energy to discuss their quoted implementation time. They informed us that this time period relates to the changes to the PARMS serials under CP1334. After discussing the change in more detail, they agreed that the specific changes under CP1348 would require minimal additional implementation time or effort.

CPC00697

2 June 2011

Version 1.0

Page 7 of 8

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Detailed Impact Assessment Responses			
			serials <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Minimal impact <b>Associated costs comment</b> – Unknown
E.ON	Yes	No	<b>Agree change comment</b> – Seems Sensible <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No <b>Associated costs comment</b> – N/A <b>Any other comments</b> - Seems a sensible step
Electricity North West Limited	Neutral	No	-
London Power Networks plc, Eastern Power Networks plc, Eastern Power Networks plc, UK Power Networks (Operations) Ltd, UK Power Networks (Operations) Ltd	Neutral	No	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Yes	Yes	<b>For which role is your organisation impacted?</b> Supplier <b>Please state what the impact is</b> – Minimal process change <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No
IBM for and on behalf of ScottishPower	Yes	No	-

**No comments received on the redlined text.**



#### About Severity Codes

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CPC00697

2 June 2011

Version 1.0

Page 8 of 8

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