



Change Proposal Circular:

CPC00706: Impact Assessment of CP1360, CP1361, CP1362, CP1363 and CP1364

Responses for CP1360 'Inclusion of Audit Records for Gross Volume Correction and Dummy Meter Exchanges'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	No	Yes	90
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	No	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	No	Yes	120
Npower	Supplier and Supplier Agents (NHH & HH)	Yes	Yes	180
Scottish Power	Supplier, NHHDC, NHHDA, Generator	No	Yes	180
British Gas	Supplier	No	Yes	120

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	<p>For which role is your organisation impacted? As an LDSO we are indirectly impacted on the basis that the information used for settlement purposes is accurate and that DUoS charges are accurate).</p> <p>Please state what the impact is – See answer to previous question.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
Imserv Europe Ltd	No	Yes	<p>Agree change comment - We are already able to audit these GVC and DMX events on an adhoc basis as and when required – we do not feel there is a need for this extra level of tracking/recording.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - We would now have to keep much more thorough records on GVC and DMX events duplicating data that is already accessible and visible in our NHHDC system. These additional requirements would involve a significant amount of work to ensure entries into the database to capture all of the requirements.</p> <p>Lead time comment - We would need to amend system code to track these instances to enable the reporting to be performed. We would need to train staff to start recording this information. There would also be a dependency that no other industry change development work would be required during this time</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our operating costs as well as involve development costs.</p> <p>Associated costs comment – Unable to quantify at this time.</p>
Lowri Beck Services Limited	Yes	Neutral	<p>Agree change comment - The document which contains the GVC/DMX will need to be supplier driven. Only information the DC can provide is when the GVC/DMX took place.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes.</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	No	Yes	<p>Agree change comment - We are opposed to this change because all NHHDC agents are subject to an annual BSC audit and GVC process forms part of that audit. If an NHHDC cannot provide supporting evidence required to verify that their process is compliant then we would expect an audit issue to be raised against them for the non-compliance. We see no reason to treat GVC audit data requirements any differently from data requests relating to other activities that fall within the scope of the annual audit.</p>

Detailed Impact Assessment Responses			
			<p>For which role is your organisation impacted? Supplier and NHHDC</p> <p>Please state what the impact is - Process changes</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None</p>
TMA Data Management Ltd	Yes	Yes	<p>Agree change comment - Clarification of information to be held is always welcome in order to standardise Industry practices</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low cost</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – No costs involved</p>
SSE Energy Supply Limited	Yes	No	-
Northern Powergrid	Yes	Yes	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer.</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is - Financial – Allows for complete analysis of supplier data cleansing techniques that effect LDSO's allowed income under Ofgem's losses incentive</p> <p>Lead time comment - Not directly impacted but would be used in official reporting to Ofgem</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – None</p>
Siemens Metering, Communications & Services	No	Yes	<p>Agree change comment - Our support for these changes would depend on whether P274 is approved, as this would end the use of the GVC process. It seems unnecessary to make any changes relating to GVC, if the intention is to stop using this type of adjustment. It would be useful to see exactly what the BSC audit data request would be in relation to this information.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Some minor system and reporting changes would be required.</p> <p>Lead time comment - We would need a minimum of 4 months notice for this change.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact apart from potential conflict with P274.</p>

Detailed Impact Assessment Responses

Npower	Yes	Yes	<p>Agree change comment - We believe that the standardisation of reporting to include the key data outlined would be beneficial.</p> <p>For which role is your organisation impacted? Supplier & NHHDC</p> <p>Please state what the impact is - As a Supplier & NHHDC we currently utilise the corrective techniques prescribed within the Code and Subsidiary Documents and any changes to those documents would have an impact on our organisation.</p> <p>Lead time comment - Npower would expect that significant changes to the Code and / or Subsidiary Documents would be implemented in a manner that allowed all Parties sufficient time to make the relevant process / system changes necessary.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No, we would support June 2012 as the implementation date for this change as long as this Change Proposal is approved in the next month to allow development to begin as soon as possible.</p> <p>Associated costs comment – At present we are not in a position to provide costs of implementing this Change Proposal.</p>
Scottish Power	No	Yes	<p>Agree change comment - There is still significant work required to confirm the data that should be captured within this solution and what format this should be stored / presented in. There is also no reference to the reporting of this data or the process for how it will be audited. Additional work must be undertaken by ELEXON and the change originator to review these issues and propose a full end-to-end process as opposed to just capturing additional data items.</p> <p>The originator refers to various 'Supplier Adjustments' having an adverse impact but then only seeks to track 2 of the associated techniques. The CP should look to address the potential audit gap around all 'Supplier adjustments', which should be clearly defined in the solution.</p> <p>The change also seeks to impose a solution purely on Suppliers and NHH agents but there will be a significant impact on the process that ELEXON use to track these 'Supplier adjustments'. ELEXON will have to add new reporting and auditing measures as part of this CP and again these should be clearly defined in the solution.</p> <p>For which role is your organisation impacted? Supplier, NHHDC and NHHDA</p> <p>Please state what the impact is - Additional resource, time and potential system impacts for all existing 'Supplier Adjustment' processes.</p> <p>Lead time comment - Minimum 6 months would be required to carry out a full Impact Assessment on our internal processes. We would also propose a similar exercise carried out by ELEXON to assess the new resource and process requirements they would need to manage the full tracking and reporting of 'Supplier Adjustments'.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes. The CP as it stands is not fit for purpose and needs additional work put in place before it can be agreed. A minimum 6 month turn-around time will be required to ensure a full end-to-end process is established. Simply capturing additional data items is not enough to</p>

Detailed Impact Assessment Responses			
			adequately track the 'Supplier adjustments' that the originator refers to. Associated costs comment – There is not enough detail in the current CP to allow us to carry out an accurate cost assessment.
British Gas	No	Yes	Agree change comment - The performance assurance framework is in place to ensure compliance with the BSC. This change seeks to add new requirements on the NHHDC which may be required to be reviewed by the BSC Auditor. The Risk Evaluation Methodology is in place to ensure areas of significant risk are included within the audit. Dummy meter exchanges have not been identified as a risk area and we do not see the benefit in included these specifically within BSCP 504. For which role is your organisation impacted? Supplier Please state what the impact is - Additional requirements placed upon agents will increase costs to suppliers Associated costs comment – Costs initially incurred by agents Any other comments - This requirement would fall on our NHHDC

Comments received on the redlined text

Comments on the redline text					
No.	Organisation	Document name	Location	Severity Code	Comments
1	Northern Powergrid		4.1.4.6	H	LDSO needs to be included as an evaluation will be need to capture what technique is effecting allowed income and by how much.

Responses for CP1361 'Removal of Extreme EACs'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	No	Yes	60
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	Yes	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	No	Yes	120
Npower	Supplier and Supplier Agents (NHH & HH)	Yes	Yes	180
Scottish Power	Supplier, NHHDC, NHHDA, Generator	No	Yes	180
British Gas	Supplier	No	Yes	120

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	<p>For which role is your organisation impacted? As an LDSO we are indirectly impacted on the basis that we use EACs. Replacement of erroneous EACs will allow for more accurate read validation which in turn contributes towards more accurate revenue allowances.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>

Detailed Impact Assessment Responses

Imserv Europe Ltd	No	Yes	<p>Agree change comment - There is no definition of “extreme” to be able to assess the likely impact of this change. NHHDCs are often unable to make a decision on the likely load of a customer – especially where the read history is limited, sporadic over a long period or where there has been a recent change – and as such we are against an obligation on NHHDCs to force them to have to “guess” at the correct customer load</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - We would have to undertake some fixes that we do not currently do – as we are often unable to determine whether some EACs are valid or not – so we rely on Supplier interaction to trigger these fixes – this would cause us to have to be more proactive</p> <p>Lead time comment - Extra Work Instructions and training</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our costs</p> <p>Associated costs comment – Not yet quantified. Dependent on what is classed as “extreme”</p>
Lowri Beck Services Limited	Neutral	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	Yes	Yes	<p>For which role is your organisation impacted? Supplier and NHHDC</p> <p>Please state what the impact is - Process changes and management of revised data</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None</p>
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – No costs involved</p>
SSE Energy Supply	Yes	No	<p>Agree change comment - From a DC and supplier perspective we completely agree, these EAC should be removed from</p>

Detailed Impact Assessment Responses			
Limited			settlements immediately and that the onus is on the DC to perform that task.
Northern Powergrid	Yes	Yes	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer.</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is – See answer to Qu 1.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No as the peaks of volatility would be smoothed out.</p>
Siemens Metering, Communications & Services	No	Yes	<p>Agree change comment - Our support for these changes would depend on whether P274 is approved, as this would end the use of the GVC process. It seems unnecessary to make any changes relating to GVC, if the intention is to stop using this type of adjustment.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - We believe that the current version of EAC software is already compliant with this requirement (following changes in relation to CP1311). However changes may be required to some of our processes.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact other than potential conflict with P274</p> <p>Any other comments - It would be useful to have a definition of what should be classed as an extreme EAC.</p>
Npower	Yes	Yes	<p>Agree change comment - We do agree with this change in principal however, we do feel there needs to be some clarity or at least a definition of what would be considered to be an "Extreme" EAC. If ELEXON were to publish some criteria or to stipulate existing criteria were to be used (existing PEEEX thresholds for Profile Classes for example) then we feel this would provide consistency throughout the industry.</p> <p>For which role is your organisation impacted? Supplier & NHHDC</p> <p>Please state what the impact is - As a Supplier & NHHDC we currently utilise the corrective techniques prescribed within the Code and Subsidiary Documents and any changes to those documents would have an impact on our organisation.</p> <p>Lead time comment - Npower would expect that significant changes to the Code and / or Subsidiary Documents would be implemented in a manner that allowed all Parties sufficient time to make the relevant process / system changes necessary.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No, we would support June 2012 as the implementation date for this change as long as this Change Proposal is approved in the next month to allow development to begin as soon as possible.</p> <p>Associated costs comment – We are currently not in a position to provide related costs for implementing this change.</p>

Detailed Impact Assessment Responses

Scottish Power	No	Yes	<p>Agree change comment - We currently operate a detailed process for the review of high erroneous EACs and as such already meet the requirements of this proposed solution. Also, given the solution is already available as an option in NHHDC systems and the BSC it would be difficult to justify a system change with an associated financial development cost.</p> <p>For which role is your organisation impacted? Supplier and NHHDC</p> <p>Please state what the impact is - Minimum impact as we already review instances of high erroneous EACs and operate tighter thresholds than the ones already set by ELEXON. However, this change would impose a compulsory Impact Assessment on us as we review the existing optional process.</p> <p>Lead time comment - 6 months would be required to carry out any testing or training requirements associated with moving this process to a mandatory platform.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Minimum costs associated with system Impact Assessment and integration with new platform that is currently in development. High level cost to carry out Impact Assessment and alignment with existing system development projects.</p>
British Gas	No	Yes	<p>Agree change comment - This change is not required as a process to manage and resolve erroneous large EAC's and AA's already exists within the performance assurance framework. ELEXON monitor and report on high value EAC/AA to suppliers and to industry. This change would not represent an efficient use of BSC resources.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Although the requirement is on NHH DC's there will be a cost impact for carrying out this additional activity which will feed through to suppliers.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes</p> <p>Associated costs comment – This change represents a duplication of processes that already exist within the BSC and therefore parties will incur additional unnecessary costs</p>

No comments received on the redlined text.

Responses for CP1362 'Removal of Residual Negative EACs'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	No	Yes	30
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	Yes	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	Neutral	Yes	90
Npower	Supplier and Supplier Agents (NHH & HH)	Yes	Yes	180
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Yes	Yes	90
British Gas	Supplier	No	Yes	365

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	For which role is your organisation impacted? As an LDSO we are indirectly impacted on the basis that we use EACs. Replacement of erroneous EACs will allow for more accurate read validation which in turn contributes towards more accurate revenue allowances.

Detailed Impact Assessment Responses

			Would implementation in the proposed Release have an adverse impact on your organisation? No
Imserv Europe Ltd	No	Yes	<p>Agree change comment - Whilst we agree that some action should be taken to remove all of the residual negative EACs and agree with the spirit/sentiment of the proposal, we do not think this is the correct solution.</p> <p>For which role is your organisation impacted? NHHDA (& NHHDC?)</p> <p>Please state what the impact is - The centrally provided script will need to be run – needing IT resource, testing etc.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our costs</p> <p>Associated costs comment – Not yet quantified – but anticipated to be small</p> <p>Any other comments - As the NHHDA data comes from NHHDCs, we would suggest a better solution would be to fix the data in the source systems wherever possible. We would prefer a solution that encouraged/mandated Suppliers and NHHDCs to take positive steps to resolve residual negative EACs ASAP – with potentially some sort of solution like the one being proposed here in, say, 12 months time for all those that still haven't been actioned.</p>
Lowri Beck Services Limited	Neutral	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	Yes	Yes	<p>Agree change comment - We are supportive of this change in principle but we have concerns regarding suggested “big bang” approach which could have an adverse impact on Suppliers with regard to trading performance or supplier charges.</p> <p>For which role is your organisation impacted? Supplier and NHHDA</p> <p>Please state what the impact is - Data revisions and management of flows with revised data</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None</p>
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>

Detailed Impact Assessment Responses			
			Associated costs comment – No costs involved
SSE Energy Supply Limited	Yes	No	-
Northern Powergrid	Yes	Yes	Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer. For which role is your organisation impacted? LDSO Please state what the impact is - Same answer as Q2
Siemens Metering, Communications & Services	Neutral	Yes	Agree change comment - We previously underwent a similar exercise to this, prior to the implementation of CP1311, therefore we don't believe that we currently hold any residual negative EACs. For which role is your organisation impacted? NHHDA Please state what the impact is - Running the proposed script Associated costs comment – Cannot be certain of costs at this stage, but resources would be required for testing and implementation of the script.
Npower	Yes	Yes	Agree change comment - Npower supports this change. For which role is your organisation impacted? Supplier & NHHDC Please state what the impact is - As a Supplier & NHHDC we currently utilise the corrective techniques prescribed within the Code and Subsidiary Documents and any changes to those documents would have an impact on our organisation Lead time comment - Npower would expect that significant changes to the Code and / or Subsidiary Documents would be implemented in a manner that allowed all Parties sufficient time to make the relevant process / system changes necessary. Would implementation in the proposed Release have an adverse impact on your organisation? No, we would support June 2012 as the implementation date for this change as long as this Change Proposal is approved in the next month to allow development to begin as soon as possible. Associated costs comment – We are currently not in a position to provide related costs for implementing this change. Any other comments - Whilst supportive of this Change Proposal, npower request that ELEXON consider the potential impact on RF Performance both for individual Supply IDs and also across the Industry or removing Negative EACs. Negative EACs may have a small impact on RF Performance and a change in the rules around their use may have a detrimental impact on Supplier / Industry RF Performance.
Scottish Power	Yes	Yes	Agree change comment - Will this cause a potential mismatch between the volumes held by NHHDC systems and what is held in NHHDA? Should a review of negative EACs that currently exist in NHHDC systems be carried out as part of this CP?

Detailed Impact Assessment Responses

			<p>Also, the implementation of this script will have a large impact on the NHH %AA performance figures that are currently being reported by all Suppliers. Any existing negative EAC will be used in the %AA calculation, so if these are removed it will significantly increase the EAC volume reported by each Supplier, NHHDC and NHHDA.</p> <p>Before this change is progressed ELEXON must carry out a full impact assessment for NHH %AA performance.</p> <p>For which role is your organisation impacted? Supplier, NHHDC and NHHDA</p> <p>Please state what the impact is - Increase EAC volumes currently held within NHHDA system and drastically increase the total EAC volume associated with each Supplier / Agent ID.</p> <p>Lead time comment - Allow time to complete risk assessment on current NHH %AA reporting figures and re-forecast RF and R3 performance going forward.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Potential cost associated with increased Supplier Charges if %AA performance was to drop below current thresholds.</p>
British Gas 0	No	Yes	<p>Agree change comment - A blanket change of all residual negative EAC's with default EAC's is the wrong approach to resolve this issue. This solution could result in over correction where only small negative EAC's are in place. Suppliers should resolve these by obtaining actual reads.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Removal of negative EAC's may impact on suppliers settlement performance. Small negative EAC's could potentially be replaced by high positive EAC's which could be equally incorrect.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes. See above comments Suppliers should resolve by obtaining actual reads.</p> <p>Associated costs comment – We have not been able to obtain a cost for this change in time for the response.</p>

No comments received on the redlined text.

Responses for CP1363 'Addressing Settlement Data Adjustments in a Balanced Manner'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Yes	No	-
Imserv Europe Ltd	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes	Yes	60
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	Yes	2
EDF Energy	Supplier, NHH Agent and HHMOP	No	Yes	90
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	90
Western Power Distribution	Distributor	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	Yes	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	No	Yes	90
Npower	Supplier and Supplier Agents (NHH & HH)	No	Yes	360
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Neutral	Yes	90
British Gas	Supplier	No	Yes	120

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
IPNL	Yes	No	-
Imserv Europe Ltd	Yes	Yes	Agree change comment - The proposed solution seems to place an obligation on Suppliers - yet it is proposed to include it within BSCP504, thereby placing the obligation on NHHDCs?

Detailed Impact Assessment Responses

			<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Potential changes to reporting and extra training to address “settlement data adjustments” in a more balanced manner</p> <p>Lead time comment - Change some scripts/reports and some extra training</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? This would require more resource and would hence increase our costs</p> <p>Associated costs comment – Not yet quantified – but anticipated to be small</p>
Lowri Beck Services Limited	Neutral	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Further documentation needs maintaining for audit purposes.</p> <p>Lead time comment - Staff training to ensure the GVC/DMX are documented and stored appropriately.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact would be expected for this.</p> <p>Associated costs comment – No associated costs to the organisation.</p>
EDF Energy	No	Yes	<p>Agree change comment - Although this seems to be a laudable requirement we do not feel that it is possible to work in this manner given that we have to treat customers in an equitable manner. For the avoidance of doubt we believe this CP has potential for Suppliers to be in breach and as such is not acceptable.</p> <p>If in particular period we can only resolve those issue related to high negative values and not any with high positives then we have to fix those, which would then seem to go against this CP. As such we think this is something that can only be accepted as a best practice that will be followed were possible and not as a mandated method of operation. With that in mind we feel that change specified needs further caveats to ensure that this does not impact on timely manner of error resolution where it is not possible to achieve this equitable approach.</p> <p>For which role is your organisation impacted? Supplier and NHHDA</p> <p>Please state what the impact is - Managing data amendments</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? None above those impacts detailed in response to question 1.</p> <p>Any other comments - In any amended change we would like statement “volume of such errors” in proposed red-line text to be clarified. It currently isn’t apparent which of the following approaches should be adopted:</p> <ol style="list-style-type: none"> 1. Under or over-settlements should be addressed based on the highest number of errors in each category 2. Under or over-settlements should be addressed based on their individual impact on settlements accuracy

Detailed Impact Assessment Responses			
			3. Under or over-settlements should be addressed based on their cumulative impact on settlements accuracy
TMA Data Management Ltd	Yes	Yes	<p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Procedural</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – Low</p>
Western Power Distribution	Yes	No	<p>For which role is your organisation impacted? Not impacted - other than by receipt of more accurate settlement data.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – No costs involved</p>
SSE Energy Supply Ltd	Yes	No	-
Northern Powergrid	Yes	Yes	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is - See answer to Q2</p>
Siemens Metering, Communications & Services	No	Yes	<p>Agree change comment - Our support for these changes would depend on whether P274 is approved, as this would end the use of the GVC process. It seems unnecessary to make any changes relating to GVC, if the intention is to stop using this type of adjustment. Also, from a DC perspective, it is difficult to see how we could control this process, as our use of GVC is initiated by Suppliers.</p> <p>For which role is your organisation impacted? NHHDC</p> <p>Please state what the impact is - Process Changes would be required.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No adverse impact other than potential conflict with P274</p>
Npower	No	Yes	<p>Agree change comment - Npower does not agree with this change as we feel that Suppliers are not always in control of the reason a corrective technique may be used, for example if a corrective technique is used after customer contact (as referenced within the Change Proposal). Whilst we would always hope that corrective techniques were used in a fair and appropriate manner, the use of these techniques is driven by business need and we feel it would be almost impossible to monitor the situation and audit it.</p> <p>For which role is your organisation impacted? Supplier & NHHDC</p> <p>Lead time comment - We feel that in order to allow a process to be created that would allow fair auditing and monitoring there</p>

Detailed Impact Assessment Responses			
			<p>would be a need for extensive work to be carried out by the industry and therefore would anticipate that the changes would not be able to implemented in line with the request of the raiser.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? Yes – we do not believe that a solution can be developed in the time available for this to go live in the requested release.</p> <p>Associated costs comment – We are not in a position to provide implementation costs at present.</p> <p>Any other comments - We believe the additional work required to meet the new obligations set out within this Change Proposals is an unrealistic addition to a process that currently we feel is used in a manner to meet business needs.</p>
Scottish Power	Neutral	Yes	<p>Agree change comment - The change proposes re-enforcement of statements that are already clear within the wording of the BSC.</p> <p>For which role is your organisation impacted? Supplier, NHHDC and NHHDA</p> <p>Please state what the impact is - Internal process documents aligned with BSCP504 would need to be updated to include additional wording. However, there would be no impact on existing processes as the intent of the BSC section remains the same.</p> <p>Lead time comment - Allow internal documentation review and update.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
British Gas	No	Yes	<p>Agree change comment - This additional requirement is not necessary as Suppliers have an overarching requirement under the BSC to ensure settlement is accurate BSC Section U paragraph 1.2.1:</p> <p>“1.2.1 Without prejudice to any specific provisions of the Code relating to the accuracy and completeness of data, each Party shall ensure that and undertakes that all information and data submitted or otherwise provided by or on behalf of such Party to the Panel, any Panel Committee, BSCCo, the BSC Clearer or any BSC Agent pursuant to any provision of the Code or any Code Subsidiary Document will as far as reasonably possible be accurate and complete in all material respects.”</p> <p>We do not understand how BSCCO could monitor or enforce the following obligation:</p> <p>“the application of adjustments such as Gross Volume Correction (GVC), over- and under-statements of energy are addressed in proportion to the volume of such errors that require resolution”. We believe the proposed obligation is unworkable.</p> <p>For which role is your organisation impacted? Supplier</p> <p>Please state what the impact is - Suppliers should have the ability to correct errors within settlement. Our processes and procedures are built to identify errors which are then corrected by whichever means is appropriate under the BSC. We do not understand how system and process changes could be made to satisfy the obligation</p>

No comments received on the redlined text.

Responses for CP1364 'Remove BSC Systems constraint on maximum negative CALF values'

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
IPNL	LDSO, SMRA	Neutral	No	-
Lowri Beck Services Limited	NHHDC, NHHDA, NHHMO, NHHDR	Neutral	No	-
EDF Energy	Supplier, NHH Agent and HHMOP	Yes	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	No	-
SSE Energy Supply Limited	Supplier	Yes	No	-
Northern Powergrid	LDSO	Yes	No	-
Siemens Metering, Communications & Services	NHHDC, NHHDA, HHDC, HHDA, MO	Neutral	No	-
Npower	Supplier and Supplier Agents (NHH & HH)	Neutral	Yes	-
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Yes	No	-
British Gas	Supplier	Neutral	No	-

Detailed Impact Assessment Responses

Organisation	Agree?	Impacted?	Comments
IPNL	Neutral	No	-
Lowri Beck Services Limited	Neutral	No	-
EDF Energy	Yes	No	-
TMA Data	Yes	No	-

Detailed Impact Assessment Responses			
Management Ltd			
SSE Energy Supply Limited	Yes	No	-
Northern Powergrid	Yes	No	<p>Agree change comment - This proposed change would reduce volatility within settlements and therefore movements in allowed income effecting LDSO's, use of system charges effecting Suppliers and ultimately the end customer.</p> <p>For which role is your organisation impacted? LDSO</p> <p>Please state what the impact is - See answer to Q2</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p>
Siemens Metering, Communications & Services	Neutral	No	-
Npower	Neutral	Yes	<p>For which role is your organisation impacted? Supplier</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? No</p> <p>Associated costs comment – We cannot provide costs at present.</p>
Scottish Power	Yes	No	-
British Gas	Neutral	No	-

No comments received on the redlined text.