Any Questions
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Change Proposal Circular – CPC00739 Responses

CPC00739: Impact Assessment of CP1408

Summary of Responses for CP1408

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
BES Commercial Electricity	Yes	No	N/A	Yes
British Gas	Yes	Yes	None	Yes
EDF Energy	Yes	No	N/A	Yes
G4S Utility and Outsourcing Services (UK) Limited	Yes	Yes	Unknown	Yes
Imserv Europe Ltd	Yes	Yes	5 man days	Yes
RWE Npower	Neutral	Yes	Unknown	Yes
ScottishPower	Yes	Yes	N/A	No
SSE Energy Supply Ltd	Yes	Yes	Approximately 2 FTE.	Yes

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Detailed Impact Assessment Responses CP1408	
Organisation	**Responses/Comments**
BES Commercial Electricity	**Agree with the implementation approach? -** Yes because it won't really affect us in any way. **Do you believe there would be a benefit if similar controls were imposed on HH market? –** Neutral because we do not supply HH. **How feasible do you believe similar changes to HHDA systems would be? –** N/A **Any other comments?** – Agree with change because we already remove almost all negative AA's from our portfolio via our DC anyway. However, because no negative AA's enter our settlement, it is highly unlikely that we will get a negative EAC and therefore we are not impacted.
British Gas	**How is your organisation impacted? –** Positively, as the validation of EAC/AA excess of 1Twh by NHHDA is undesirable. **What are the associated costs on your organisation to implement the change? –** None. **Agree with the implementation approach? –** Yes. **Do you believe there would be a benefit if similar controls were imposed on HH market? -** Yes – after a similar assessment it may be sensible to limit the value of EAC/AA in the HH market although the limit may need to be set at a different value dependent on analysis of available data. **How feasible do you believe similar changes to HHDA systems would be? –** Unknown. **Any other comments? –** Agree with change because the changes proposed will only restrict the validation of values which are entirely unrealistic in the NHH market.
EDF Energy	**Agree with the implementation approach? –** Yes because it provides prevention action at earliest point in time. **Do you believe there would be a benefit if similar controls were imposed on HH market?** - Neutral because no views

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Detailed Impact Assessment Responses CP1408	
Organisation	**Responses/Comments**
	were expressed on this aspect. **How feasible do you believe similar changes to HHDA systems would be?** – No comments. **Any other comments?** If a Large EAC/AA is picked up by a NHHDA Control Point, does this still appear on an ELEXON Report? What is the proposed threshold for this change? If a Large EAC AA of this kind does not appear on a report communicated to the supplier, what is the process for resolving Large EAC/AA s of this kind? How is the Supplier informed of Large EAC/AA s of this type?
G4S Utility and Outsourcing Services (UK) Limited	**How is your organisation impacted?** – Testing and implementation of a new version of NHHDA. Update to NHHDC D0023 working procedures to take account of the new trigger of NIV failure reasons. **What are the associated costs on your organisation to implement the change? –** No comment. **Agree with the implementation approach? If not, why? –** Yes **Do you believe there would be a benefit if similar controls were imposed on HH market?** - Neutral **How feasible do you believe similar changes to HHDA systems would be? –** N/A **Any other comments?** Agree with change this is the simplest and best placed validation check to stop excessively large NHH EAC/AA values entering into settlement. Will the tolerance value for this validation become part of the MDD data? If not how will it be published. The proposal says this validation check will result in an NIV D0023, this isn't reflected in the redline documents, will this level of detail be added to the NHHDA documentation? What method is envisaged to update this value into NHHDA?
Imserv Europe Ltd	**How is your organisation impacted? –** We are an NHHDA.

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Detailed Impact Assessment Responses CP1408	
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	What are the associated costs on your organisation to implement the change? – 5 man days to test new NHHDA and internal communication. **Agree with the implementation approach? –** Yes **Do you believe there would be a benefit if similar controls were imposed on HH market?** - Potentially Yes. As a HHDC we already have our own extra validation to prevent this sort of issue arising – but if another HHDC sent erroneously high values to our HHDA then this would cause an issue. **How feasible do you believe similar changes to HHDA systems would be?** – The cost/effort would probably outweigh the benefit due to the individual number of HHDA systems involved. **Any other comments? –** Agree with change because it is the only place where we can ensure that we fully trap any large EAC/AA errors.
RWE Npower	**How is your organisation impacted?** – We are a qualified NHHDA and will therefore need to make the required changes to our systems. **What are the associated costs on your organisation to implement the change?** – We are unable to provide costs at this stage. Although the software is maintained centrally by the BSCCo, RWE npower would need to test the package received to ensure its implementation would not have unintended consequences on other processes and applications. **Agree with the implementation approach?** – Yes **Do you believe there would be a benefit if similar controls were imposed on HH market?** – It is unclear at present as the costs would be more significant in the HH market as HHDC / HHDA systems are individual to agents. Therefore the benefits would need to be understood.

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	How feasible do you believe similar changes to HHDA systems would be? - The changes to HHDA systems would be more difficult to implement as the software is not provided centrally and therefore individual HHDAs would need to implement in a manner suitable to their bespoke software. At this stage, we believe further work should be undertaken to understand the risks within the HH market. **Any other comments?** - We agree with the principle of this change but have concerns that the threshold proposed as the limit will have little or no impact in preventing significant values from entering settlement. We are supportive of the intentions of the CP but do not feel the threshold limit delivers assurance or protection to the industry. Our main concern is the threshold level. The level that has been proposed will not prevent the values entering settlement which were the driver for this CP being raised. We feel that the figure of a Peta watt will result in no change to the current practice and parties could release values that could significantly impact other parties within the BSC. Also, within the UDC document it refers to a lock on values that have more digits than a configurable value, while the BSCP505 redline mentions that values which exceed a configurable value. This point just needs clarification to make sure we understand what would pass and fail.
ScottishPower	**How is your organisation impacted?** – We will have to amend the NHHDA system to reject the appropriate EAC/AA data and to accept the additional data in the J-item J1361. **What are the associated costs on your organisation to implement the change? –** N/A **Agree with the implementation approach? If not, why?** – No. We believe it will be difficult to implement this change by November 2014, the change will require both BSC and DTC changes which will require system updates and the common consensus is that these require a minimum 6 month implementation date. Based on this 6 month implementation timescale both CP1408 and the associated DTC change will have to be approved by 1st May 2014 at the very latest. At this stage we don't believe the DTC

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	change has been raised and as such we would therefore suggest a February 2015 date is more suitable. **Do you believe there would be a benefit if similar controls were imposed on HH market?** - If there is evidence of a similar issue within the HH market then it would seem prudent to extend the controls to the HH market. **How feasible do you believe similar changes to HHDA systems would be?** - This is managed by our service provider and as yet the feasibility is unknown. **Any other comments?** – Agree with change as it makes sense to stop erroneous information entering into the settlement process.
SSE Energy Supply Ltd	**How is your organisation impacted? –** As a Supplier minimally, though some updates will be required to our NHHDA systems. **What are the associated costs on your organisation to implement the change? –** Initial view is approximately 2 FTE. **Agree with the implementation approach? –** Yes. **Do you believe there would be a benefit if similar controls were imposed on HH market?** - No. We are broadly in agreement with ELEXON on this point, though we would give consideration to a change proposal in the HH market depending upon the justification, cost and implementation. **How feasible do you believe similar changes to HHDA systems would be?** – N/A **Any other comments? -** It would be useful to have a sense of what the proposed consumption threshold value may be.

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Summary of Comments on BSCP redlining		
Organisation	**Document name & location**	**Comment**
SSE Energy Supply Ltd	BSCP505	We would have thought some reference needs to be made to the D0023 process regarding rejection of an erroneous EAC/AA.

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