


## Change Proposal Circular – CPC00737 Responses

### CPC00737: Impact Assessment of CP1407

#### Summary of Responses for CP1407

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
British Gas	Yes	No	N/A	Yes
EDF Energy	Neutral	No	N/A	Yes
Electricity North West	No	Yes	None	No
Northern Powergrid Northeast and Yorkshire	No	Yes	Unknown	No
RWE Npower	Neutral	No	N/A	Neutral
ScottishPower	Yes	Yes	None	Yes
SSEPD	Yes	Yes	None	Yes
TMA Data Management Ltd	Yes	No	N/A	Yes
UK Power Networks	No	Yes	Yes	No
Western Power Distribution	Yes	Yes	None	Yes

Detailed Impact Assessment Responses CP1407	
Organisation	Responses/Comments
British Gas	<p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> No comments.</p>
EDF Energy	<p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> No comments.</p>
Electricity North West	<p><b>How is your organisation impacted?</b> – We will need to complete the new CSAD each year and take part in the Audit each year.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – None identified.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No</p> <p><b>Any other comments?</b> We agree and support some of the proposed changes but have reservations about the calculations in the new Appendix 9 and believe further development is required. Full details are in the response for Appendix 9 comments. Following our comments in Appendix 9 and us making the required adjustments and calculation changes, the workbook then appears to produce the correct LAF/LLF for a selection of customers including export generation that both impacts both positively and negatively with respect to network losses.</p> <p>We attach an example to aid further tests.</p> <div style="text-align: center;">  </div> <p>Microsoft Office Excel 97-2003 Works!</p>

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	<p>Generally, we welcome the changes with the additional workbooks; however we envisage one workbook per EHV customer operating mode (potentially completing a maximum of two workbooks per audited customer based on import and export operation).</p>
Northern Powergrid Northeast and Yorkshire	<p><b>How is your organisation impacted?</b> – We may need to convert our existing templates to transfer data into the proposed templates or produce our own templates then copy values across into the new templates and we are currently unsure of the time and resources required to do this.</p> <p>We may struggle to accommodate the new templates this year depending on when they would be introduced.</p> <p>We would like to know whether a test period is possible so we can look at any necessary data conversions or potential automated data transfer convert. i.e. if they are introduced in 2014 could we have until 2015 submission to do put in place the data conversion/transfer arrangements?</p> <p>If the proposed audit sheet calculations could produce different values from LDSO calculated values would LDSO's be expected to explain any differences (even if the LDSO had properly calculated its values in line with its methodology)?</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Unknown would have to do a cost analysis and look at any investment cost, hence the proposal for a test period.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No, not yet. We are supportive of the principle of smoother audit processes, but we have some concerns about some of the details and would welcome further clarification.</p> <p><b>Any other comments?</b> We are supportive of the principle of smoother audit processes and we invested a great deal of time and money in developing our methodology and data sheets to make our processes automated and auditable. We are still a little unclear of the purpose of the calculation elements of the new LLF audit templates and whether the calculations would result in</p>

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	<p>differently calculated values than those calculated by LDSOs using their own individual LLF calculation methodologies.</p> <ul style="list-style-type: none"> <li>Is it clear that this proposal would ONLY result in a data collection sheet to support the audit process and not a new way of calculating LLF values?</li> <li>Any new calculation methodology must be out of scope of this change (we understood that common methodology was ruled out of scope as a result of P216 due to potential high costs for LDSOs in relation to lesser benefits).</li> <li>We assume that an LDSOs would not be required to explain or justify any differences between its calculated values and any different values produced by ELEXON from any new audit data template, unless the LDSO's calculation is suspected of being flawed in relation to its own methodology and backed by some evidence of such.</li> <li>If the proposal means more work for LDSOs – even if just in terms of duplication of effort – then a second consultation ought to be produced to more clearly understand costs and benefits of CP1407.</li> <li>Northern Powergrid would be happy to attend a face-to face meeting to discuss our support for the smoother audit arrangements and to also discuss our questions and observations, but we would ask you to note that some of our LLF project resources may currently be tied up on other activities and we will need to consider a mutually acceptable date for such a meeting.</li> </ul>
RWE Npower	<p><b>Agree with the implementation approach?</b> – Neutral</p> <p><b>Any other comments?</b> No comments.</p>
ScottishPower	<p><b>How is your organisation impacted?</b> – Only to the extent that we will now be required to complete the new templates, however we do not expect this to be a major issue.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – None</p>

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	<p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> Agree with change as it makes sense to apply consistency across the Industry.</p>
SSEPD	<p><b>How is your organisation impacted?</b> – The submission documents have altered and will require populating from new. The audit process has altered and will require some coaching.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – No comments made.</p> <p><b>Agree with the implementation approach?</b> - Yes the change should be implemented so it is in place for the 15/16 LLF submission process.</p> <p><b>Any other comments?</b> The proposed documents still require some format changes as highlighted in responses.</p>
TMA Data Management Ltd	<p><b>Agree with the implementation approach?</b> - Yes</p> <p><b>Any other comments?</b> No comments.</p>
UK Power Networks	<p><b>How is your organisation impacted?</b> – We would need to amend our methodology. In its current form, the common LLF calculation template would not necessarily simplify the way we calculate LLFs, and there is a chance it would add complexity and further steps to our processes. The consequence of this would potentially increase the risk of error.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – If the template was to remain as proposed, this would add complexity to our current process and require a methodology/process change. As mentioned below we view that increased complexity would further the possibility of error. An additional 3 hour's work per site is not unrealistic once checking and validation have been considered. Typically for 100 sites per year this may add a total of 300 man hours.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No, we do not support the implementation as it currently stands.</p>

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	<p>We believe common template with calculations would be better accompanied with a methodology because:</p> <ol style="list-style-type: none"> <li>1. This would explain differences (if any) to DNO calculated values</li> <li>2. Provide a consistent explanation of common calculated values that DNOs could reference in their own methodologies.</li> </ol> <p>In its current form the template would add complexity, particularly with CVA sites that have one set of LLF to express where both export and import values need to be considered, and where fixed-losses may need to have asymmetrical treatment in respect to import/export power flows.</p> <p><b>Any other comments?</b> We do not agree with the proposal in its current form. We support the principle of having a common LLF calculation template, but we believe by issuing a template containing formulae, that this should be accompanied by a methodology. Essentially this would explain any potential variation in the calculated values through providing an explanation on how the calculations work, and a definition of any inputs required.</p> <p>As mentioned above, we are supportive of the principle of a common template; however we do believe the common template would be better placed with an accompanying common methodology. Again, as mentioned above, essentially we would view the role of the methodology as providing an explanation of the calculated facts, and a description of the inputs required. With the provision of a common methodology we would be able to reference this as part of our own calculations methodology.</p> <p>Additionally we are prepared to participate as part of the consultation process and promote what we believe to be best practice.</p>
Western Power Distribution	<p><b>How is your organisation impacted?</b> – The preparation of the CSAD will be easier to prepare and check with less potential for errors.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – None.</p> <p><b>Agree with the implementation approach?</b> - Yes.</p>

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	<p><b>Any other comments?</b> – Agree with change because moving Appendix 5 from the CSAD Word document will make our job more straightforward and the use of a standard template, Appendix 9, for the audited sites will have a minimal impact on us. This response is subject to the extra explanations given by Chris Braley of ELEXON.</p> <p>These in particular being:</p> <p>Only 5 or 6 appendix 9s would have to be filled in for each distribution area, i.e. for those sites chosen to be audited;</p> <p>That we can take a pragmatic view of the data requested in Appendix 9, i.e. where data is not relevant or readily available it can be omitted or replaced with relevant data.</p> <p>We thought the 'Applicable LLFCs' sheet in Appendix 5 might work better transposed with the LLFC Group Names across the top and the Applicable LLFCs going down the sheet.</p>

Summary of Comments on BSCP redlining		
Organisation	Document name & location	Comment
Electricity North West	BSCP128, Appendix 9	We do not agree with the calculations in this Appendix.
	BSCP128 – Appendix 3, section 3.1	Agree with references to Appendix 5 but not Appendix 9.

## Summary of Comments on BSCP redlining

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	BSCP128 - Appendix 4, section 3.1	Agree with references to Appendix 5 but not Appendix 9.
	BSCP128 - Appendix 5 - CSAD 2.1 and 2.2 Tables	Agree with the changes here. A spreadsheet is more suitable for the provision of this data.
	BSCP128 – Appendix 9 workbook	<p>We do not agree with the calculations in this Appendix.</p> <p><u>In terms of the general information on the summary sheet:</u></p> <p>Connection voltage would be better in kV seeing as this exercise is for site specific only and would generally be an HV/EHV customer.</p> <p>Year of Data – this would generally be based on the consumption for the previous financial year and the ASC recorded at the end of that financial year. However, it could be a future site and therefore would be assumed data with no year.</p> <p>Default line loss factors.... Does default mean EHV generic or say a default of 1 as per one of our sites last year...?</p> <p><u>In terms of the calculation sheet:</u></p> <p>We do not calculate site specific LAFs for multiple time periods or STODS. Therefore we apply the same LAF for all of the four possible STOD periods.</p> <p>The field titles in the LHS column may not be accurate as follows. (generally load vs losses terminology)</p> <p>Network Load Connecting the Customer (MWh) would be better worded as Network Losses with Customer Connected</p>



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		<p>Network Load Disconnecting the Customer (MWh) would be better worded as Network Losses with Customer Disconnected</p> <p>Customer Load (MWh) Negative Value if export would be better worded as Customer import/export units (negative value if export)</p> <p>Load Difference Attributable to Customer would be better worded as Losses Difference Attributable to Customer</p> <p>Interactive site specific customers require a form of losses apportionment between the interactive sites. We have sampled Two Sites to show how this is not easily accommodated in this form – hence % multiplication factors contained in row 1 and row 2. It was a bit confusing to obtain the correct values. Generally, interactive sites may have been overlooked.</p> <p>We also needed to change the calculation formula in relation to Variable Losses Attributable to Customer. This contained a subtraction of the customer load or import/export units. We do not think this is correct and have therefore removed this part of the calculation in order to offer correct output results.</p> <p>Following the above adjustments and calculation changes, it appears to output the correct LAF/LLF for a selection of customers including export generation that impacts both positively and negatively with respect to network losses.</p>
Northern Powergrid	BSCP128 - Appendix 5	There appears to be nothing too onerous here for Northern Powergrid. Our macros and

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Northeast and Yorkshire		spreadsheets would need reworking.
	BSCP128 - Appendix 5 - CSAD 2.1	<p>The first table may benefit from an additional column to indicate generic LLFc used or not. Northern Powergrid hope that this is to cover both SVA and CVA sites. If so then another column to indicate SVA/CVA is required.</p> <p>The second table with STOD definitions probably needs rethinking so that each STOD can have a number of times or months associated with it.</p>
	BSCP128 - Appendix 5 – CSAD 2.2	<p>The second table with STOD definitions probably needs rethinking so that each STOD can have a number of times or months associated with it.</p> <p>There would be some work required by Northern Powergrid to set this up for population by macros etc and it would have been good if this could have been offset by this replacing the need to submit a D265 file.</p>
	BSCP128 - Appendix 9	<ul style="list-style-type: none"> <li>• This appears to require Northern Powergrid to potentially rework our current methodology to meet the new templates, we would need to write macros, etc – and this has implications on time and manpower.</li> <li>• The ELEXON templates may not give the same answers as our existing methodology, but we would surmise that the difference is de minimus. This would benefit from testing, possibly on one area to see if there are significant differences, however we are currently focussed on other priorities at the moment, including work for RIIO ED1. We would therefore propose a mutually agreed (LDSO and</li> </ul>

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		<p>ELEXON) test timetable.</p> <ul style="list-style-type: none"> <li>• We would welcome more time to understand the implications and evaluate the work required to efficiently accommodate the new template. At the moment we are unconvinced that it would improve our processes</li> <li>• We would welcome assurance that LDSO's would not be required to rework their methodologies due to a new audit template. If that was the case the implications could be very onerous (building our current methodology took us around 18 months at significant cost)</li> <li>• Any new methodology may also lead to the requirement for a new MSAD, MSAD approval, reworking our calculations and then a potential exercise to explain to customers why the LLF values applying to their sites have changed.</li> <li>• The ELEXON audit is understandably stringent, with variance in loss adjustment factors in the third decimal place commonly having to be explained; therefore any difference in values between those produced by the new audit sheets and LDSO methodologies could cause significant work. There are likely to be very significant differences if LDSOs simply just populate the template.</li> </ul>
	BSCP128 - Appendix 9 – Attachment I	<ul style="list-style-type: none"> <li>• The network calculation sheet may be a bigger problem if we need to revisit all our models to try to bring out all the requested information and then write macros etc to populate an ELEXON audit template for each site.</li> </ul>

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		<ul style="list-style-type: none"> <li>• The larger problem is that the template appears to predefine how LLFs are calculated in detail for a customer and each LDSO does it differently and the commonality of each LDSO methodology is its adherence to the 16 principles.</li> <li>• If we populated the template with Northern Powergrid data, it is likely not to produce the same answers as we calculate in our submission. This is due to treatment of fixed and iron losses for load and generation effectively loss sharing or substitution. We also calculate losses attributable at each voltage level whereas the template appears to do this at a high level. The template may benefit from expansion for each voltage level involved.</li> </ul>
SSEPD	BSCP128: Appendix 3 , addition to Guidance note 1.3	The addition says that "Appendices 5 and 9 should accompany this document", however Appendix 9 is to be used as part of the audit which occurs after the submission of the Appendix 3 (CSAD).
	BSCP128: Appendix 4 , addition to Guidance note 1.3	The addition says that "Appendices 5 and 9 should accompany this document", however Appendix 9 is to be used as part of the audit which occurs after the submission of the Appendix 3 (CSAD). Also, should Appendix 9 only follow the submission when the Embedded DNO does not mirror the Host DNO?
	BSCP128: Appendix 5, table 2.1 Site Specific table	The footnotes included in the current Appendix 3 in relation to the 2.1 table should be included in the Excel format. This includes amending the amount of STOD periods and names, that the Agreed Capacity should only be included when this is used during the calculation of the LLFs and that explanations should be provided if there has been a significant change to the MSID from the previous

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		submission.
	BSCP128: Appendix 5, table 2.1 Site Specific table	To accommodate questions 10c and 10d on significant changes to SVA and CVA LLFs in Appendix 3, SSEPD currently provide a difference percentage between the current LLFs and new submission LLFs. This quickly highlights which sites have changed.
	BSCP128: Appendix 5, table 2.1 Site Specific STOD	The drop down list (located at cells T115:T126) used for selecting the Start Month/End Month should have their format changed, either to text format or edit the End Month to show the last day of the month. At the moment the months appear in the formula bar as 01/Month/14, which then implies that the End Month is the 01/Month/14. For example, you would select February from the drop down list as your End Month, but the formula bar shows this as the start of the month, rather than the last day.
	BSCP128: Appendix 5, table 2.2 Generic table	Have columns for STOD periods 1,2,3,4 and 6 but not for 5.
	BSCP128: Appendix 5, table 2.2 Generic table	The footnotes included in the current Appendix 3 in relation to the 2.2 table should be included in the Excel format. This includes amending the amount of STOD periods and names, and that approximate MPAN numbers are acceptable for submission.
	BSCP128: Appendix 5, table 2.2 Generic STOD	Good that this feeds through from previous table, but the End Month issue needs to be fixed.
	BSCP128: Appendix 5, Applicable LLFC	Having a separate table for applicable LLFCs may increase risk of error through misalignment. Its

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	table	practical to keep Table 2.2 with the applicable LLFC field, rather than a separated table with several fields for each individual LLFC.
	BSCP128: Appendix 9, LLF Calculation Sheet	Only 5 STODs included when 6 have been used in Appendix 5.
	BSCP128: Appendix 9, LLF Calculation Sheet	Add footnote to allow for amending amount of STOD periods.
	BSCP128: Appendix 9, LLF Calculation Sheet	Line Loss Factor Check (optional) table – line 47 should be formatted to percentage, to bring in line with the description of the row.
	BSCP128: Appendix 9, LLF Calculation Sheet	Line Loss Factor Check (optional) table – line 47 formula currently shows the difference from the New LLFC to the Current LLFC. As the Current LLFCs have been approved, it makes sense to show the difference from the Current LLFC to the New LLFC. This can be accommodated in the formula as: $(D45-D46)/D46$ .
	BSCP128: Appendix 10, All	Slightly fewer questions than in Appendix 3/4 which are more relevant to mid-year submissions, therefore it doesn't impact the process as a full D0265 flow is still required.