

CP Consultation Responses

CP1578 ‘Amendments to BSCP128 to enable Embedded LDSOs to calculate and submit Site Specific LLFs as required’

This CP Consultation was issued on 10 July 2023 as part of the July 2023 CPC Batch, with responses invited by 4 August 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Northern Powergrid	1	Distributor
UK Power Networks	1	Distributor
SSEN	1	Distributor
National Grid Electricity Distribution	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Northern Powergrid	✓	✓	✓	✓
UK Power Networks	✓	✓	x	✓
SSEN	✓	✓	✓	✓
National Grid Electricity Distribution	✓	✓	✓	✓

Question 1: Do you agree with the CP1578 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	The proposed solution clarifies the issues identified in the CP.
UK Power Networks	Yes	Although we believe that the proposed solution is appropriate and addresses the concerns raised, in addition we are of the view that the embedded LDSO needs to provide any relevant data to the LDSO a reasonable period of time before the LDSO submission takes place. This will ensure that their connection and any associated assets are included within the LDSO calculation, which we would suggest is by the end of June of the relevant year. Furthermore, each LDSO has an obligation to recalculate site specific losses once every five years, although we will often recalculate ours every three years. As a result it would be useful if the embedded LDSO were required to notify the LDSO of any sites they will be submitting data for in advance of end of June to allow the LDSO to plan their list of sites accordingly.
SSEN	Yes	This CP provided new clarification on the procedure, requirement and deadline on requests and data provision between Host DNO and Embedded LDNOs, to enable site specific LLFCs calculation for relevant embedded end users.
National Grid Electricity Distribution	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1578 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
Northern Powergrid	Yes	The amendments to the draft redlining following the first consultation have addressed all of the issues identified and we have not identified any further issues.
UK Power Networks	Yes	-
SSEN	Yes	-
National Grid Electricity Distribution	Yes	-

Question 3: Will CP1578 impact your organisation?

Summary

High	Medium	Low	None
0	0	4	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Low	Yes. Updates to process and methodology documents will be required. Additional ongoing work will be required to calculate any boundary LLFs requested, although as the number of Embedded LDSOs choosing to calculate their own site specific LLFs is expected to be low we expect the additional work to have a relatively low impact. This could increase in the future as there will be more IDNO connections, but this cannot be quantified.
UK Power Networks	Low	We will need to ensure that in addition to submitting the Losses to Elexon we ensure that any impacted embedded LDSO also receives data for their site(s) no later than 1st October each year. The issues noted in response to Q1 also need to be addressed.
SSEN	Low	There will be updates to Host DNO internal procedures and documents to incorporate the changes required by CP1578. The level of impact is low given the low number of expected requests we will receive from Embedded LDNOs.
National Grid Electricity Distribution	Low	No changes but additional work

Question 4: Will your organisation incur any costs in implementing CP1578?

Summary

High	Medium	Low	None
0	0	3	1

Responses

Respondent	Response	Rationale
Northern Powergrid	Low	Yes. There will be ongoing costs associated with the additional workload for calculating boundary LLFs which are not currently calculated. As the numbers of Embedded LDSOs choosing to calculate their own site specific LLFs is expected to be low we expect the costs incurred to facilitate the additional work to be low.
UK Power Networks	No	-
SSEN	Low/None	It was not foreseen that any financial costs will incur following implementation of CP1578, as the extra work should be covered by BAU resources.
National Grid Electricity Distribution	Low	There will be low costs involved in validating and potentially collating received data into to the format that we require.

Question 5: Do you agree with the proposed implementation approach for CP1578?

Summary

Yes	No	Neutral/No Comment	Other
4	0	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid	Yes	The implementation date will not impact the requirements for the 2024/25 calculations, due to be submitted in September 2023, but ensures that the change comes into effect as soon as practicable.
UK Power Networks	Yes	Implementation in February 2024 as part of a standard release is appropriate and will ensure all parties will be able to comply for the losses calculation later that year.
SSEN	Yes	Agree with the proposed implementation date, to enable changes to be applied for the 25-26 submission as the earliest opportunity.
National Grid Electricity Distribution	Yes	-

Question 6: Do you have any further comments on CP1578?

Summary

Yes	No
0	4

Responses

Respondent	Response	Comments
Northern Powergrid	No	-
UK Power Networks	No	-
SSEN	No	-
National Grid Electricity Distribution	No	-

BSCP128

Respondent	Location	Comment