

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 9 May 2023 as part of the May 2023 CPC Batch, with responses invited by 6 June 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
UK Power Networks	1	Distributor
Northern Powergrid	1	Distributor
BUUK	1	Independent Distributor
National Grid Electricity Distribution	1	Distributor
Energy Assets Networks Ltd	1	Distributor (embedded)
Stark	1	Distributor, Supplier Agent (NHHDC, NHHDA, HHDC, HHDA, MOA)
SSEN	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
UK Power Networks	✗	✓	✓	✓
Northern Powergrid	✓	✓	✓	✓
BUUK	✓	✓	✓	✓
National Grid Electricity Distribution	✓	✓	✓	✓
Energy Assets Networks Ltd	✓	✓	✗	✓
Stark	✓	✓	✓	✓
SSEN	✓	✓	✗	✓

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

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	No	LDSOs do not have Boundary Metering installed between ourselves and Embedded LDSO networks. We believe that this would be required to allow the Embedded LDSO to calculate site specific losses on their network as well as the LDSO needing it to calculate the appropriate losses on our networks. We believe further consideration is required concerning practicable solutions to ensure accuracy of measurement at the boundaries before proceeding with a solution.
Northern Powergrid	Yes	The proposed solution clarifies the issues identified in the CP.
BUUK	Yes	We believe this addition to the process is required to ensure it works consistently long-term.
National Grid Electricity Distribution	Yes	-
Energy Assets Networks Ltd	Yes	It is our understanding that a similar process is used for when site-specific LLFs are calculated for interconnections between Host LDSO parties – an exchange of information is needed from both sides to calculate the LLF without the need for a boundary meter to be installed.
Stark	Yes	-
SSEN	Yes	This CP provided new clarification on the procedure, requirement and deadline on requests and data provision between Host DNO and Embedded LDNOs, so that both parties are able to comply with the requirements related to site specific LLFCs calculation for relevant embedded end users.

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

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	1

Responses

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

Respondent	Response	Rationale
UK Power Networks	Yes	Yes, we have reviewed the proposed redlined text and believe that it does deliver the proposed solution, but please see our comment for Q1 which details fundamental concerns which we have with the proposed solution.
Northern Powergrid	No	<p>The majority of the proposed solution is delivered, however the requirement for Host LDSOs to send the boundary LLFs to Elexon on 30 September (5th bullet point in the Proposed Solution in the Consultation document) appears to be missing. There is also some ambiguity around the requirements post audit, as there doesn't seem to be a requirement for the Host LDSO to provide the revised LLFs to the Embedded LDSO and, depending on the timings of the audits for the Host and Embedded LDSOs, it may not be possible for any non-compliance in the boundary LLF to be reflected in the audit report for the Embedded LDSO.</p> <p>Not related to the solution, but the version numbering on the front page and in the header says 11.6, but on the Amendment Record it says it should be 11.1, however all other changes have increased the version number by 1 so it seem to make sense for this to increase to version 12.</p>
BUUK	Yes	-
National Grid Electricity Distribution	Yes	-
Energy Assets Networks Ltd	Yes	With the August deadline for LLF requests to be sent to the Host LDSO

CP1578

CP Consultation
Responses

7 June 2023

Version 1.0

Page 4 of 13

© Elexon 2023

		and the October deadline for the Host LDSO to submit back to the Embedded LDSO, it supports the timescales for timely publication of the Relevant Year's LLF tables in the Charging Statement (Annex 5).
Stark	Yes	-
SSEN	-	See our response to question 6.

Question 3: Will CP1578 impact your organisation?

Summary

High	Medium	Low	None
0	0	7	0

Responses

Respondent	Response	Rationale
UK Power Networks	Yes	Our business (an LDSO) will be impacted by this change, but we believe this will only be in a limited way as it will only be when an embedded LDSO has an EHV site and informs us of the existence of this connection, although noting the concerns raised in response to Q1.
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.
BUUK	Low	-
National Grid Electricity Distribution	Low	No changes but additional work
Energy Assets Networks Ltd	-	EAN would need to update their business processes and potentially business systems to hold the data that will be required by the Host LDSO to calculate the site-specific tariffs. Until such point, the new arrangements can be managed with a manual workaround.
Stark	Low	-
SSEN	Low	There will be updates to internal procedures and documents to incorporate the changes required by CP1578. The additional requirements will need to be carefully slot in among

		existing procedures and may have an effect on the current working timeline. The level of impact also depends on the number of requests we receive from Embedded LDNOs.
--	--	--

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

Summary

High	Medium	Low	None
0	0	5	2

Responses

Respondent	Response	Rationale
UK Power Networks	Low	We will have additional costs, mainly relating to peoples time due to the requirement to calculate additional LLFs.
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.
BUUK	Low	-
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.
Energy Assets Networks Ltd	None	Manual workaround to support CP1578 initially.
Stark	Low	-
SSEN	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.

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

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	Yes	Yes we agree with the proposed approach, although we note that this would result in any changes not taking effect until the LLFs are calculated next year for 2025/26
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.
BUUK	Yes	-
National Grid Electricity Distribution	Yes	-
Energy Assets Networks Ltd	Yes	We agree with the approach but question whether a November release supports the statement in the CP that the date 'ensure the planned changes to the LLF submission process are public prior to the 30 September 2023 LLF submission deadline'.
Stark	Yes	-
SSEN	Yes	-

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

Summary

Yes	No
2	5

Responses

Respondent	Response	Comments
UK Power Networks	No	-
Northern Powergrid	Yes	<p>In Principle 1b it states that site specific losses can be applied “Where the customer has requested a Site Specific LLF, and the LDSO is in agreement.”</p> <p>Does this mean that an embedded LDSO could agree to site specific losses for a site without the host LDSO being aware of it?</p> <p>Consideration should be given to including the following in order to provide extra clarity:</p> <p>“Where the customer has requested a Site Specific LLF, and the LDSO (and the host LDSO if the customer is connected to an embedded LDSO) is in agreement.”</p>
BUUK	No	-
National Grid Electricity Distribution	No	-
Energy Assets Networks Ltd	No	-
Stark	No	-
SSEN	Yes	<p>Deadline of request and data provision: Currently the proposal according to the Redlining of BSCP128 requires Embedded LDSOs to submit request for boundary LLFs to Host DNOs by 1st August. It should be added that <u>the Embedded LDSOs should also provide the boundary profile to the Host DNO by the same deadline (1st August) in order for the request to be considered. Also, earlier indication of request and provision</u></p>

	<p><u>of the required data is strongly preferable by Host DNOs.</u></p> <p>Specifications of the data provision from Embedded LDSO to Host DNOs:</p> <p>The redlining of BSCP128 has not specified the type of profiles that the Embedded LDSO should submit to Host DNOs. It should be added that the profiles of the following specification should be submitted:</p> <ol style="list-style-type: none">1. 12 months Boundary equivalent (i.e. LLFs adjusted to the boundary) profiles for each of the EHV end user within the Embedded LDSO that requires site specific LLFs calculation.2. 12 months boundary equivalent (i.e. LLFs adjusted to the boundary) profile for the whole of the Embedded network (i.e. including all EHV and lower voltages usage), where there is any EHV end user that requires site specific LLFs calculation. <p>Impact on host DNO generic LLFs calculation: Host DNOs conduct their generic LLFs calculation utilizing aggregated settlement profiles for each voltage of their network, in accordance to the current NewLAF model. For where a boundary meter is not available, prior to CP1578, if there are any embedded networks connected to Host DNOs, generic LLFs were assumed. In light of CP1578, where Embedded LDSOs calculated site specific LLFs for their EHV end users, which are likely to differ from the Host's generic LLFs, the boundary LLFs and profiles calculation could be impacted. We suggest some discussion need to take place as whether it is feasible for Host DNOs to take in this updated profile, and when. As the current CP1578 suggests, Embedded LDSOs are to provide the boundary profile to Host DNOs as part of the request, it is then the obligation of the Embedded LDSOs to provide such profile that has</p>
--	--

		<p>incorporated any new site specific LLFs that they calculated for their end users and adjust their end user profile to the boundary, by 1st August prior to the BSC year.</p> <p>Publication of the boundary LLFs: this CP currently has not specified in which form or format the boundary LLFs should be submitted to Elexon or provided to Embedded LDSOs, so there is potential for further clarification. Our thoughts are that:</p> <ul style="list-style-type: none"> • boundary LLFs could be published along Host DNO's In-area CSAD Appendix 4 submission, • Boundary LLFCs could be raised to the calculated boundary LLFs, however, these LLFCs serve no settlement purpose. • Therefore, no D0265 flow required as for boundary LLFCs.
--	--	--

BSCP128

Respondent	Location	Comment
Northern Powergrid	2.3.4	The requirement for Host LDSOs to provide Elexon with the network boundary LLFs by 30 September has not been added, as per the proposed solution.
Northern Powergrid	2.3.14	Requirement on LDSO to resubmit any revised LLFs to address any outstanding non-compliances, but if a host LDSO has had to recalculate a boundary LLF there is no requirement for them to provide this revised LLF to the Embedded LDSO and no time delay for the embedded LDSO to then do their own recalculation based on the revised Host LDSO value.
Northern Powergrid	2.3.12	Is the Host LDSO audit guaranteed to be before the Embedded LDSO audit? If not then it may not be possible for any non-compliance in the Boundary LLFs identified in the Host LDSOs audit to be reflected in the audit report for the Embedded LDSO within 5WD of the audit for the Embedded LDSO.
SSEN	2.3.1	<p>It should be added that the <u>Embedded LDSOs should also provide the boundary profile to the Host DNO by the same deadline in order for the request to be considered.</u></p> <p>More on our response to question 6.</p>