

CP Consultation Responses

CP1591 'New Site Visit Check Code Set value'

This CP Consultation was issued on 11 December 2023 as part of the December 2023 CPC Batch, with responses invited by 10 January 2024.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Northern Powergrid Ltd	1	Distributor
Scottish Power	1	Supplier
Siemens	1	Supplier Agent
British Gas	1	Supplier
SSE	1	Supplier
UK Power Networks	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Agree draft red-lining?	Impacted?	Costs?	Impl. approach?
Northern Powergrid Ltd	✗	✓	High	High/Med	✗
Scottish Power	Neutral	✓	High	High	✓
Siemens	✓	✓	Low	Low	✓
British Gas	✗	✓	Low	Low	✗
SSE	✗	✓	Medium	Med	✓
UK Power Networks	✓	✓	Low	Low	✓

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CP1591

CP Consultation
Responses

22 March 2024

Version 1.0

Page 2 of 9

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Question 1: Do you agree with the CP1591 proposed solution?

Summary

Positive	Negative	Neutral/No Comment	Other
2	3	1	0

Responses

Respondent	Response	Rationale
Northern Powergrid Ltd	Negative	<p>We disagree with this CP on the rationale that the associated DCP411 was rejected by DNOs.</p> <p>In line with our comments to DCP411:</p> <p>The change states that “De-energised sites, with site-specific billing, are able to retain capacity on the network without being charged for it under the current methodologies”, however this is incorrect.</p> <p>This implies that it is the connection itself that must be maintained when a site is de-energised, not the capacity.</p> <p>We also are unsure how ‘de-energised customers should be charged fixed and capacity charges in full’ (para 1.6) when they may no longer have a contract with the original supplier and may well have no responsibility for the premises.</p> <p>In addition, DNOs may not use the agreed capacities, but rather the actual maximum demand on the network to assess the load on the network and the need for reinforcement. If a site is de-energised it will not be contributing to the load on the network and therefore will not impact whether the area of the network requires reinforcement.</p> <p>The specific changes to data item J0024 Enumeration would add a requirement that would fulfil the change proposal solution, but no we do not agree with the intended purpose of the change.</p> <p>Irrespective of DCP411, we do not agree with the CP.</p> <p>The D0139 is a rejection/confirmation of change of energisation, it has no direct relationship with DUoS billing and we don’t believe it is the right</p>

		mechanism to inform suppliers that DUoS charges will apply.
Scottish Power	Neutral	Whilst we agree with the solution for CP1591 as this is a consequential change related to DCP411, we would like to highlight that ScottishPower does not support the primary change DCP411. As noted in our response to DCP411, this places a financial burden onto suppliers that they may be unlikely to pass on to the end user. Within our response we have offered alternative solutions.
Siemens	Positive	Yes, this must be done to facilitate the DCUSA change/s.
British Gas	Negative	<p>For the relatively few sites that the solution may be needed to be used for we think the solution is over-engineered.</p> <p>All parties that use the Site Visit check code will need to make changes to their validation even though many domestic only suppliers will never be sent the new value.</p> <p>The data provided to the DCP 411 consultation suggested that there are around 1700 sites nationally in measurement classes C and E that have been de-energised for less than 2 years and therefore may want to reserve capacity.</p> <p>A better solution may be to use the Contract Manager escalation route in SDEP to notify the supplier that the de-energised site will be subject to DUOS charges.</p>
SSE	Negative	<p>SSE does not believe that adding a new Enumeration Value to Data Item J0024 in the D0139 dataflow is sufficient for Suppliers to be able to set up MPANs for standing charges.</p> <p>Suppliers will require information, such as who the DNO has communicated with, to decide that the Capacity at site needs to be reserved. As such, we believe a new Dataflow should be created to notify Suppliers that DUoS charges are applicable to de-energised sites.</p>
UK Power Networks	Positive	We proposed DCP411 and fully support this change being made to the BSC

Question 2: Do you agree that the draft redlining delivers the CP1591 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6	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 Ltd	Yes	Although we agree that the CP delivers the proposed solution, we oppose the redlining on the basis that the associated DCP411 was rejected. In addition, the D0139 is confirmation of physical energisation status change and has no direct relationship with DUoS billing and we don't believe it is the right mechanism to inform suppliers that DUoS charges will apply.
Scottish Power	Yes	
Siemens	Yes	Single new addition to existing reference table/s will achieve this. There is an issue that is detailed in the 'Further Information' section at the end of this document.
British Gas	Yes	
SSE	Yes	Whilst we do not agree with the solution, the redlining does deliver the solution as it is currently proposed.
UK Power Networks	Yes	

Question 3: Will CP1591 impact your organisation?

Summary

High	Medium	Low	None
2	1	3	0

Responses

Respondent	Response	Rationale
Northern Powergrid Ltd	High	Build and test activities will be required on both our DUoS billing and LDSO systems and processes, including an interface between the two. We need the proposed implementation date to allow us to assess the required changes in line with our Market-wide Half Hourly Settlement (MHHS) programme plan and understand whether they can be accommodated by us and our service providers.
Scottish Power	High	Impacts will be as a direct impact of the primary change DCP411
Siemens	Low	Siemens send and receive flows impacted by the change to J0024. These roles are MEM/MOP, NHHDC & HHDC. Without change we may receive the new code and it'll fail processing as it will not exist in our systems.
British Gas	Low	Changes to systems to use the new site valid check code
SSE	Medium	We will need to put processes in place to manage the DCP411 changes. These will be made more complicated if the current solution in CP1591 is implemented, rather than the alternative solution of creating a new dataflow.
UK Power Networks	Low	Minimal administrative – System access level changes required for some users

Question 4: Will your organisation incur any costs in implementing CP1591?

Summary

High	Medium	Low	None
2	1	3	0

Responses

Respondent	Response	Rationale
Northern Powergrid Ltd	High/Med	Changes will be required to our LDSO and DUoS billing systems and associated processes.
Scottish Power	High	Impacts will be as a direct impact of the primary change DCP411
Siemens	Low	This will impact our organisation so low-cost change required.
British Gas	Low	-
SSE	Med	Should CP1591 be implemented, we would need to develop an IT solution to ensure identification of de-energised sites to which DUoS charges are applicable. This will create a one-off cost which would not otherwise be necessary.
UK Power Networks	Low	Minimal administrative – One-off costs to make access level changes.

Question 5: Do you agree with the proposed implementation approach for CP1591?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

Responses

Respondent	Response	Rationale
Northern Powergrid Ltd	No	'As soon as practicable' raises concerns due to the complexity of the changes required and the inflight activities for the Market-wide Half Hourly Settlement (MHHS) programme.
Scottish Power	Yes	Subject to Ofgem's decision, we agree this change should be implemented in line with the primary change DCP411
Siemens	Yes	n/a
British Gas	No	We disagree with the solution proposed
SSE	Yes	Whilst we do not agree with the solution, we have no issues with the implementation approach.
UK Power Networks	Yes	We support the proposed implementation for this change which would only go ahead if DCP411 was approved.

Insert CSD Here

Respondent	Location	Comment
SIEMENS	J0024 Enumeration Item	Receipt of any D0139 with these newly introduced codes (or any beyond the current known scope of codes for MEM/DC) we will reject that flow. This requires no effort on our part as this is current functionality for field validation for all flows received.