

Request for Information Responses

Industry impacts of large scale changes to Market Domain Data as a result of the Targeted Charging Review (TCR)

This RFI was issued on 10 August 2020, with responses invited by 21 August 2020.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ (HH)	0/1	Supplier Agent: HHDC/HHDA
BPG Energy	1/0	Supplier
IMServ (NHH)	0/1	Supplier Agent: NHHDC, NHHDA, NHHMO & HHMO
Last Mile Electricity	1/0	Distributor
SP Energy Networks	1/0	Distributor
SSE Energy Supply	1/0	Supplier
Energy Assets Networks	1/0	Distributor
Goto energy (QEEN)	1/0	Supplier
Northern Powergrid	1/0	Distributor
Stark	0/1	Supplier Agent: HHDC, HHDA; NHHDC; NHHDA
Western Power Distribution	1/0	Distributor
Scottish Power	1/1	Supplier, Supplier Agent
ENGIE	1/0	Supplier
Electricity North West Limited	1/0	Distributor

TCR MDD Impacts RFI Responses

23 August 2020

Version 1.0

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Question 1

1A) Are you able to load such large volumes of MDD changes per month and sending larger monthly partial MDD sets over the DTN (i.e. using the D0269 and D0270 data flow) over a prolonged period?

1B) what impact will processing such large MDD releases have on your obligations to load the files, e.g. some must do so within 5WD?

1C) Currently MDD is pushed to Parties and Party Agents over the DTN using D0269 and D0270 flows. What other means of receipt or retrieval (other than the existing DTN flows) are you able or willing to consider? For example, would it help if we published D0269/D0270s (or an equivalent file) on the ELEXON Portal?

Summary

Yes	No	Neutral/No	Other
10	1	1	2: 1A) yes: 2 1B: Unlikely to meet 1C) No:2

Responses

Respondent	Response	Rationale
IMServ	1A : yes 1B: Unlikely to meet 1C: Unlikely this would help	As a HHDC/HHDA historically we have not had to support such large volumes of LLFC updates and have therefore always handled these in a fairly manual way. Such an exponential increase will have a significant impact on the amount of manual and system effort required to process. We are currently exploring the possibility of automating some elements of our processes but it would also be beneficial if timescales could be relaxed from 5 WD. We may be unable to process such large flows in 5 WD.
BPG Energy	Yes	BPG currently receive the MDD via e-mail, and the file is sometimes up to 10MB. Whilst BPG can receive files up to 50MB, some organisations may have lower limits in place so this may cause issues for others. We anticipate that we will be able to load larger volumes within the MDD over a prolonged period. We would be willing to consider retrieving the D0269/D0270s from the Elexon Portal.

Respondent	Response	Rationale
IMServ (NHH)	Yes	<p>MO do not load MDD automatically and will ignore LLFs. NHHDC / NHHDA can load these bigger files as we have capacity</p> <p>We would definitely consider retrieving MDD via the ELEXON Portal – great idea</p>
Last Mile Electricity	Neutral/No Comment	<p>Last Mile are encouraged by the fact that due to the volume of new LLFCs and associated combinations these will be split over multiple versions of MDD rather than in a 'Big Bang' approach.</p>
SP Energy Networks	<p>1A) yes</p> <p>1C) No</p>	<p>We do not anticipate significant technical problems with the upload of the D0269 Flow, although it may result in additional work to ensure that the updates flow through to all internal systems (SMRS and billing systems). There will be preparatory work required internally to ensure that all systems are capable of receiving the load and the data contained therein. We anticipate that the file will take additional time to upload, however this currently takes place outside of business hours, therefore we do not see it as high risk.</p> <p>We currently use the DTN MDD update files; and as we have processes in place to manage this, we see no benefit to ourselves in receiving this via an alternative route/format.</p>
SSE Energy Supply Ltd	No	<p>Our ability to load large volumes of MDD change/ send larger monthly partial MDD sets over a prolonged period is dependent on whether the D0269/D0270 flow structure and data items will change and increase in size, which is not clear from the information provided with this RFI – please can Elexon confirm? To process larger load volumes that also encompass changed requirements to the data flow structures/ sizes and data items would require a significant amount of system change.</p> <p>Similarly, to change away from use of the DTN to receive/ send these flows would require system/ process change so our preference would be to retain the use of the DTN.</p> <p>In the OFGEM Switching Programme world the new registrations processes are far more Application Programme Interface / Web service enabled. Everything is currently so flow and file based and a move towards a more publish/subscribe and notification approach for MDD data loads would be</p>

Respondent	Response	Rationale
		a really nice to have option. This 'Event' model would mean that Elexon provide a series of MDD updates [Publish] and market participants would subscribe. The business need stated, to get notifications, could also be accommodated. We could proliferate a published event internally through our own subscribe mechanisms for the systems concerned and issue notifications associated with the events subscribed to.
Energy Assets Networks	Yes	Our external IT service provider has not raised any concerns on the receipt and processing of large MDD files. As all LDSOs use the same MPAS product, we do not foresee any issues specific to EAN. On the assumption that Electralink will confirm that the DTN can support the routing of large files, EAN can support the receipt of the file via the DTN or downloadable from a website. However we would not support distribution by email due to internal system constraints.
Goto energy (QEEN)	Yes	<p>Yes, the software we use has capability to load this data with the D0269 flow that is received from our supported market interaction adaptors. We believe the software should support these changes without issues. But to increase confidence we would like to see a sample D0269 flow with included changes for our own testing first.</p> <p>No impacts on our obligations is expected.</p> <p>Our preference is to use the D0269 flow.</p>
Northern Powergrid	Yes	We believe we will be able to load the D0269/D0270 DTN files but would like to test the process as per question 3 to validate this.
Stark	Yes (under certain condition)	<p>i. There are several stages to loading the MDD flow. In all systems we load D0269 (complete MDD set) each month. We do not load the D0270.</p> <p>For HHDC/HHDA/NHHDC/NHHDR we rely on the Access database applications "MDD Load Utility Version v6" and "MDD Load Utility Version v7.1" (both of which are provided by Elexon) to load MDDs.</p> <p>If these applications can load larger monthly files, then our subsequent loading processes should also be able to cope with these changes. There will obviously be increased processing times for the larger files.</p>

Respondent	Response	Rationale
		<p>For NHHDA, the NHHDA Solaris unix system processes the D0269 file. There are known issues in the past where MDD files have failed to load due to the number of LLFCs present in the file. This is still an issue in version 11. However, we hope to have upgraded well before these MDD changes are live.</p> <p>ii. The large MDD file will not have more of an impact on our obligations to load MDDs compared to our current obligations, provided we are able to load the file successfully – potential concerns outlined above.</p> <p>iii. We receive MDD files over the DTN and by email depending on our participant role. We would like for this to continue.</p> <p>HHDC/HHDA/NHHDC</p> <p>We receive the MDD flows from BSC Central Services to our dac_ccm@stark.co.uk mailbox.</p> <p>We have several versions sent to us: (where nnn is the MDD version number)</p> <ul style="list-style-type: none"> • MDDVnnn-1.zip: Contains D286.tmp, FULLMTC.tmp, D227SSC.tmp, D280.tmp, UPDMTC.tmp. D0269 is Version 002. • MDDVnnn-1a.zip: Contains D286.tmp, FULLMTC4.tmp, D227SSC.tmp, D280.tmp, UPDMTC4.tmp. D0269 is Version 004. • MDDVnnn-8.zip: Contains D299.tmp • MDDVnnn-2.zip: Contains D286.tmp, FNRGMTC.tmp, D227SSC.tmp, D280.tmp, UNRGMTC.tmp <p>NHHDA</p> <p>We receive the MDD flows from the DTN. D0269 is Version 002,</p>
Western Power Distribution	Yes	We currently load the D0269 and believe that we will be able to meet our obligations to load this larger MDD release.

Respondent	Response	Rationale
		We would prefer that the DTN is continued to be used to send this file to parties as it provides validation and security. Any other method would require major system changes.
Scottish Power	Yes	<p>Due to the proposed large amount of data to be contained within the MDD, we anticipate that this will have an impact on system performance when loading, and, as such, we would expect to load this information outside of core office hours. It is also further expected to take 5-10 WDs to process completely, taking into consideration processing fall out. To support this activity it would be helpful if we were provided with an estimate of volumes by MPAS provider, that we are expected to receive and when they have been scheduled to be issued.</p> <p>There would also be an impact to processes if there was to be any change to the existing formatting of the MDD.</p> <p>In support of this proposal we are willing to consider this data being published and available via the ELEXON Portal.</p>
ENGIE	Yes	<p>We have reviewed this with our CRM software provider and confirmed that our software has capability to load this data with the D0269 flow that is received from our Market Interaction software. We believe the CRM software should support these changes without issues. But to increase confidence we would like to see a sample D0269 flow with included changes for our own testing first.</p> <p>No impacts on our obligations are expected.</p> <p>Our preference is to use the D0269 flow rather than any other solution.</p> <p>Our Market Interaction software provider has confirmed that they do not have any concerns with this change.</p>
Electricity North West Limited	Yes	We have already completed a significant amount of work creating LLFCs ahead of the timescales. The impact on ENWL (in terms of the sheer number of LLFCs) is not as significant as some other DNOs. We do not anticipate any issues in terms of loading volumes of changes over a consistent period, but this will obviously need to be robustly tested ahead of the March 2021 date.

Respondent	Response	Rationale
		We continue to support the DTN route as separating the flows into a different system risks data integrity and completeness.

Question 2

2A) Are you able to load significantly larger D0265 files for LLFCs?

2B) Are there any other retrieval methods (other than the existing BSC Portal) that would better facilitate the sending and receipt/retrieval of larger D0265 files?

Summary

Yes	No	Neutral/No Comment	Other
5	3	5	1: 2A) Yes:1 2B) No:1

Responses

Respondent	Response	Rationale
IMServ	2A) Yes 2B) No	We would be likely to load D0265 flows overnight and be able to meet the required deadline.
BPG Energy	N/A	This does not impact us directly currently. The D0265 file is loaded into software utilised by our third party software provider, Utiligroup.
IMServ (NHH)	N/A	None provided
Last Mile Electricity	Neutral/No Comment	Last Mile have approached our IT provider and believe they are awaiting further confirmation on the full scope of the TCR changes before confirmation of implications of significantly larger D0265 files.
SP Energy Networks	Neutral/No Comment	As a DNO we would be issuing the D0265, we do not anticipate a significant increase in this file for our Network Areas. We believe this is for the recipients to respond to.
SSE Energy Supply Ltd	No	<p>We question whether the estimated increase to ~2GB is accurate, as this seems very large – can Elexon explain why it anticipates such a large size increase? Our assumption is that current systems could fail to load such large D0265 file sizes (as the usual size is much smaller at a few MBs), however this would require further investigation by our external software provider.</p> <p>Our preference would be to retain the current retrieval method to maintain the accessibility and efficiency of the current industry processes.</p>

Respondent	Response	Rationale
Energy Assets Networks	Neutral/No Comment	We don't process D0265 files.
Goto energy (QEEN)	No	No, as our software does not currently support the D0265 flow, and we have no requests or planned changes to support it.
Northern Powergrid	Yes	NPg are introducing 24 new LLFCs in each licence area. Assuming linearity in the size of the file, this will increase the size of NPG's D0265 files for NPgN and NPgY from 36Mb and 73Mb to 41Mb and 78Mb respectively. We do not foresee a problem for NPg with this increase in D0265 file size.
Stark	Yes	<p>i/ We do not foresee any issues with loading a larger D0265 file. It is expected that the larger file will take longer to process.</p> <p>ii/ No. We currently use the BSC Portal to download D0265 and are notified when there are any changes – as long this process is unchanged, we are happy to continue using it.</p>
Western Power Distribution	Yes	<p>We believe that this question is more for a Supplier to respond to. However as a DNO we are required to produce the D0265. Our understanding is that Elexon might be able to produce the data directly from the CSAD, we would therefore question whether there is any use for the D0265 going forward?</p> <p>In respect of sending the D0265, this could be sent using an FTP, however, it is the size of the file not the method of transportation that is ultimately the issue for parties.</p>
Scottish Power	Yes	<p>As the above, this volume increase would result in significant performance issues and would impact on processing times.</p> <p>No other preference for retrieval methods other than accessing the data from the ELEXON Portal.</p>
ENGIE	No	<p>Our CRM software does not currently support automatic processing of the D0265 flow, it is loaded manually after being received via email.</p> <p>It would be helpful if a test D0265 could be issued to ensure the larger file made it through the firewall and could be uploaded to the CRM system successfully.</p>
Electricity North West	Yes	As stated above, we have already created the new LLFCs ahead of the March 2021 date. This has

Respondent	Response	Rationale
		<p>increased the size of the file but we expect other DNOs (who typically have a significantly higher number of LLFCs) to have bigger issues than we have.</p> <p>We do not expect to have any issues with the upload of the larger files.</p> <p>We continue to support the current method of file retrieval as this is well known and does not appear to have any issues.</p>

Question 3

3A) Would testing of MDD (D0269 and D0270) or LLFC (D0265) files be beneficial to your organisation?

3B) If yes, what form of testing would your organisation seek to complete? How long would testing take to complete before you were satisfied you could receive and process larger MDD and LLFC files?

Summary

Yes	No	Neutral/No Comment	Other
11	2	0	1: 3A) yes 3B) Couple of weeks

Responses

Respondent	Response	Rationale
IMServ	Yes	Sample MDD files containing the sort of expected volumes that we would receive would be useful. Running testing would likely take 1 to 2 weeks
BPG Energy	No	No, we don't consider testing of the MDD to be beneficial to our organisation.
IMServ (NHH)	3A) yes 3B) Couple of weeks	1 sample D0269 of average "new" size would be useful as we can load to a test system to check all OK
Last Mile Electricity	No	None provided
SP Energy Networks	Yes	We would see no benefit in testing the D0265 file as we are confident that there will be no issue in creating it from a DNO perspective. We have a process for managing these releases at the moment and would see a benefit in the provision of a representative 'mock' D0269 file to allow testing in our environments to ensure that we have an indication of load times to ensure that there is no residual issues in downstream systems. We believe that a 3 or 4 week test period would allow enough time to ensure robust testing was carried out across all key systems.
SSE Energy Supply Ltd	Yes	The opportunity for appropriate testing of these files is essential. Again, clarity is needed as to whether the D0269/D0270 flow structure and data items will change and increase in size, as well as the traffic of

Respondent	Response	Rationale
		flows increasing, in order to adequately impact assess and estimate the type and level of testing required. At minimum, volume testing is required. We require full visibility of change requirements and a representative timeline for planned industry activity in order to conduct appropriate internal impact assessment and scheduling of system testing and delivery.
Energy Assets Networks	Yes	Testing prior to implementation is a prudent approach and EAN could complete testing within 5 working days.
Goto energy (QEEN)	Yes	Yes, testing with a full sized sample D0269 flow would be beneficial for our own stress testing of the software. We would roughly estimate a two week window for testing would be appropriate.
Northern Powergrid	Yes	Testing the MDD files would be beneficial and would give us comfort and certainty that the process would work in live. If the MDD test files were the peak size expected; one successful load of the files would be sufficient.
Stark	Yes	<p>Yes. With such significant changes to the files, testing for both MDD (D0269) and LLF (D0265) will help SSIL mitigate any risks to processing the proposed files.</p> <p>At the very least we would require sample D0269 and D0265s sent for us to test processing. Testing would take approximately 2 weeks before we are satisfied the larger files will not cause us any issues.</p>
Western Power Distribution	Yes	We would definitely want to test the D0269 and would require a sample MDD load to test all our systems including Durabill, MPRS and Gatekeeper. Any testing would have to be co-ordinated with our third party service provider, Utilisoft.
Scottish Power	Yes	<p>We would look to test both the receipt of the MDD and LLFC files, along with the data extraction from the ELEXON Portal.</p> <p>It is difficult to state how long this testing would take to be completed until undertaken due to the volumes to be loaded and processed successfully.</p> <p>We would also appreciate testing of DUoS flows once the charges are updated as we expect the increase in volumes to continue through to them. We appreciate this is not a BSC matter but we</p>

Respondent	Response	Rationale
		would prefer E2E testing of all flows, not just those governed by BSC.
ENGIE	Yes	<p>Testing with a full-sized sample D0269 flow would be beneficial for our CRM service provider's stress testing of their software. We would roughly estimate a two-week window for testing would be appropriate. See comments in Question 2 regarding D0265 testing.</p> <p>Our Market Interaction software provider has confirmed that they do not have any concerns with this change.</p>
Electricity North West	Yes	We would look to upload the new increased file sizes into our test environment to understand the impact of the larger files and the processing timings.

Question 4

4A) Do you have agreed plans in place for the migration onto new LLFCs and management of subsequent data flows between April 2021 and April 2022?

4B) Do you have system or process limits on numbers of updates you can process?

Summary

Yes	No	Neutral/No Comment	Other
4	4	3	3: 4A) yes:1 no:2 4B) yes:2 no:1

Responses

Respondent	Response	Rationale
IMServ	4A) No 4B) Yes	Without further analysis, we are unsure of the impact of large D0209s
BPG Energy	4A)yes 4B) No	We have begun planning for the migration onto new LLFCs, but as it stands currently, our portfolio is approx. 5300 MPANs and our business model is to acquire MPANs strategically on a non-domestic basis, therefore we do not anticipate that migrating onto new LLFCs between April 2021 and April 2022 would cause us an issue with significant volumes, especially if the D0171s are received in a batched manner.
IMServ (NHH)	No	None provided.
Last Mile Electricity	Neutral/No Comment	Last Mile as an SMRA will endeavour to stagger updates to LLFCs to avoid large numbers of D0171 and D0209s hitting the DTN in one batch run.
SP Energy Networks	4A) No 4B) Yes	<p>There is currently no formal agreement in place to manage the update of these volumes of LLFC updates.</p> <p>As a DNO we would be keen to restrict this to a maximum of 20k updates per working day on our system to ensure the stability/Integrity of our SMRS System. The data flows will be issued automatically to Suppliers/DA on the update of the SMRS information.</p> <p>As a DNO we believe that the timescale of April to June 2021 has been driven by the ongoing work in the Faster Switching Programme and in trying to mitigate the risk to the DNO/Industry in progressing</p>

Respondent	Response	Rationale
		with these updates. All relevant parties will be involved in the 'testing phases' of the Faster Switching Programme in 2021, the April to June 21 timescale is trying to mitigate against impacts on industry resources and the proposed Programme change freeze scheduled, at this point to commence Nov 2021 and run till Jan 2022 (this is still to be confirmed in the final re-plan).
SSE Energy Supply Ltd	No	<p>For planning migration onto new LLFCs and management of subsequent data flows, we require confirmation of whether any changes are going to be made to existing LLFCs – please can Elexon confirm whether this is the case? In addition, please can Elexon provide clarity on the 'effective from' date(s) of the amended/ new LLFCs?</p> <p>In terms of system or process limits, this is not possible to quantify without further detail of the content/ size/ frequency of updates.</p> <p>We would also suggest that further consideration be given to the impact of the increasing volumes of DTN flow traffic, and the pressure this will put on both that system and industry systems/ processes.</p> <p>We also note that in the RFI document it is uncertain whether LDSOs have a maximum number of updates per day, and whether the updates would be applied on a per calendar day or per working day basis. The difference between per calendar day and per working day updates is significant, as this may also impact on system functionality and potential requirements for change.</p> <p>We note that the DTN currently operates on a combination of automatic and manual processing of flows. A fully automated DTN would be much more effective and efficient for both managing increased flow traffic, interfacing with industry and reducing risk to settlement.</p>
Energy Assets Networks	No	EAN has not yet agreed, or expects to agree, migration plans with any industry participant as yet but will endeavour to meet industry timescales once they have been finalised. At this stage we are not aware of any system limitations.
Goto energy (QEEN)	yes	Yes, our software already supports changes to the LLFC by loading and processing the D0171 flow. Although we expect our software to handle this, it would be beneficial for suppliers to be advised of their expected spread and peaks of these D0171

Respondent	Response	Rationale
		flows that require processing, this would ensure our software provider can monitor and support large volume processing for a smooth transition. Ideally we would aim to process many of these flows outside of core business hours
Northern Powergrid	Neutral/No Comment	NPg will migrate all non-domestic customers (NPgN 117k and NPgY 162k). Restrictions on the MPRS system limit this to circa 20k per area per day and these volumes will need to be co-ordinated with industry parties and BAU activities.
Stark	No	<p>i/ We do not have any plans in place to process the subsequent flows as we do not currently know the volumes we will be receiving.</p> <p>ii/Our systems do not limit the number of updates we can process; however, it will be closely monitored during the time.</p>
Western Power Distribution	Yes	Plans to schedule the migration of MSID records to the new LFFCs are in hand. However, given the volume of MSIDs to be migrated across the 14 Distribution companies and the huge volumes of data flows requiring to be sent to both the Suppliers and Data Aggregators we believe that there should be a co-ordinated centralised migration plan put in place.
Scottish Power	Yes	<p>Our CRM software already supports changes to the LLFC by loading and processing the D0171 flow. Although we expect our CRM software to handle this, it would be beneficial if we could be advised of the expected spread and peaks of these D0171 flows that require processing, this would ensure our service provider can monitor and support large volume processing for a smooth transition. Ideally we would aim to process many of these flows outside of core business hours.</p> <p>Our Market Interaction software provider has confirmed that they do not have any concerns with this change.</p>
ENGIE	None provided	<p>Our migration plans will be developed to manage the volume of data flows that we are expecting to receive are confirmed for between April 2021 and April 2022. However, we can manage to process up to 10K flows per day.</p> <p>We would also need clarification on the effective from dates of these updates and any impacts on the</p>

Respondent	Response	Rationale
		DUoS charges that have already been published for April 2021 if the flows are sent before April 2022.
Electricity North West	Yes	Our current aim is to migrate the new LLF against the impacted MPANS between now and the end of this financial year.

Question 5:

5A) Are there any wider industry or organisation-specific system changes or projects that could impact your ability to implement the changes required to deliver the TCR, in particular MDD releases and MPAS updates as described by this RFI?

5B) If yes, what are these and how will they impact your ability to implement the TCR?

For example, we understand that Faster Switching testing during 2021 could constrain opportunity for MPAS updates.

Summary

Yes	No	Neutral/No Comment	Other
8	4	2	0

Responses

Respondent	Response	Rationale
IMServ	No	We are not entirely clear. For example, implementing the February 2021 release may overlap loading MDD data and constrain each activity in some way, but the extent to which is unclear. It may be helpful to know which CPs are being included in any releases that overlap with these large MDD updates.
BPG Energy	Yes	BPG are scheduled to take part on Faster Switching testing during Q2 2021, therefore this would impact resources and, as we are a small team this would impact our ability to deliver
IMServ (NHH)	No	None provided
Last Mile Electricity	Neutral/No Comment	Last Mile are working on the Faster Switching programme in parallel with the TCR changes. These are 2 major changes in the industry and we are working hard to ensure we are compliant in all areas. We will engage with our IT providers with regards testing windows for faster switching to ensure we are meeting all obligations.
SP Energy Networks	Yes	In terms of the work being carried out on the LLFC updates, it has not yet been confirmed whether there will be a requirement to increase the current format of the LLFC from 3 characters. If this is required then there is a risk that the change governance that this requires may not allow for the commencement of this work until far later than indicated in this RFI. The LLFC is contained in a high volume of flows that impact

Respondent	Response	Rationale
		<p>DNO/Suppliers/DA's/ECOES and we anticipate that this would be a large scale change that could take up to 9 months to deliver.</p> <p>If the LLFC is to be changed we believe there would be an impact on the faster switching milestones, as there would be a potential MPRS release (and wholesale change to Industry flows) required in the middle of Industry testing (including Suppliers/DNO/IDNO) or depending on timings at the point that there is a change freeze planned.</p> <p>As far as we are aware the Faster Switching Programme is the only major piece of ongoing work that could have a major impact on this change.</p> <p>There is also a focus on the update/cleanse of LLFC's as part of the Faster Switching Programme.</p>
SSE Energy Supply Ltd	Yes	There are system implications for our organisation following divestment of our retail portfolio. This in addition to large scale complex change programmes for Faster Switching, Smart rollout, Market-wide Half Hourly Settlement, compound pressure on industry to implement further complex change within tight timescales whilst also managing operational challenges of the ongoing COVID-19 pandemic.
Energy Assets Networks	Yes	As we are all aware, the industry is going through significant change in the coming months/years - faster switching, mandating HH settlement, Access arrangements, TCR etc. Any slippages to timescales on any project could have adverse impacts on EAN's ability to achieve Implementation timescale.
Goto energy (QEEN)	Neutral/No Comment	There should not be any issues, but it will depend if there are any industry update pauses
Northern Powergrid	Yes	As above the LLFC migration will need to be carefully planned and will need to consider BAU activities and the Faster Switching Programme which has a Go Live window March to early April 2022; the plan is currently out for industry consultation and may be subject to change. We understand that Ofgem is discussing the impacts of the TCR on the Faster Switching Programme.
Stark	No	The Faster Switching discussion has only been speculated out recently so it hasn't been reviewed fully yet. However generally speaking, we don't think it will affect our resources to make the required changes. It is over a year away so it will be planned accordingly.

Respondent	Response	Rationale
Western Power Distribution	Yes	Our test environments are already committed through 2021 for the Faster Switching programme.
Scottish Power	Yes	<p>Yes, we are going through significant system changes to support the Faster Switching Programme. Although currently undergoing a Full Plan Review which is to be completed in Sept 2020, it is anticipated that resource will be involved in end-to-end product and system testing throughout Q1/Q2/Q3 2021. Further, changing combinations in 2021, particularly the valid combinations is likely to have an impact on the data cleansing work being monitored via the Data Working Group on the Programme. Adding such high numbers to the valid combination list has a real risk of increasing the invalid combinations. This needs to be monitored and managed as part of the programme as it has not been considered to date. In addition, we would anticipate to others flows such as D0030/D0040/D0041/D0204/D0217.</p> <p>Resource will additional be allocated to the SMART metering programme and Mandatory Half Hourly Settlements project.</p> <p>As such we would prefer that this change is implemented in 2021 to allow us time to prepare our internal planning to be operationally ready and this would also be in line with at least 6 months to implement an industry change.</p> <p>Finally, our analysis of the recent Ofgem RFI on Network Access & Forward Looking Charges has highlighted a risk of an even larger number of LLFCs being required (dependent on the final decision). We believe this should be discussed from the start to allow all industry participants (including suppliers, DNOs and DAs) to fully understand any potential impacts.</p>
ENGIE	Yes	The Switching Programme will have an impact as Suppliers and their service providers will be engaged in UEPT and E2E testing. The TCR changes will place additional strain on testing and development resource.
Electricity North West	No	None provided

Question 6

Are there any other related processes triggered by changes to LLFCs which may affect you as a BSC Party or Party Agent?

Summary

Yes	No	Neutral/No Comment	Other
5	8	1	0

Responses

Respondent	Response	Rationale
IMServ	No	None provided.
BPG Energy	No	Not that we are aware of.
IMServ (NHH)	No	None provided.
Last Mile Electricity	Neutral/No Comment	Last Mile will be making relevant changes to billing systems and processes in parallel with the TCR changes.
SP Energy Networks	No	Other than BAU activities, and Faster Switching Data cleanse we are not aware of any processes that would have a significant affect.
SSE Energy Supply Ltd	Yes	It is possible related processes impacted by changes to LLFCs, however as stated above clarity is needed as to whether the D0269/D0270 flow structure and data items will change and increase in size, as well as consideration of the traffic of flows increasing, in order to adequately impact assess and identify related processes. Please can Elexon provide clarity with respect to that?
Energy Assets Networks	No	Not that we are aware of at this stage.
Goto energy (QEEN)	Yes	From our software provider - Yes, our B2B/ commercial suppliers who use the pricing and quoting module will use the 'Distribution Pricing Import' that has a LLFC element to it, if these formats change then subsequent changes to the Junifer software may be required.
Northern Powergrid	Yes	There will be subsequent updates to our internal interfacing systems which will need to assessed and managed.
Stark	No	We believe the existing processes should handle the LLFC changes providing the file format and content is valid.

Respondent	Response	Rationale
Western Power Distribution	Yes	There could be a potential increase in the number of D0023 data flows from the Data Aggregator reporting details of failures.
Scottish Power	Yes	The changes will only impact the MDD process that will have to be updated in our systems.
ENGIE	Yes	<p>Our CRM software provider has advised that B2B commercial suppliers such as ourselves who use the Junifer pricing and quoting module will use the 'Distribution Pricing Import' that has a LLFC element to it, if these formats change then subsequent changes to the software may be required.</p> <p>Our Market Interaction software provider has confirmed that they do not have any concerns with this change.</p>
Electricity North West	No	There are still a number of key decisions on access and forward looking charging, half hourly settlement etc. which may have implications for LLFCs. These could have impacts on the systems but until these decisions are made, we are unable to quantify the impact.

Question 7

Do you have further comments on the impacts or risks of large scale changes to Market Domain Data as a result of the Targeted Charging Review (TCR)?

Summary

Yes	No
4	10

Responses

Respondent	Response	Comment
IMServ	No	N/A
BPG Energy	No	N/A
IMServ (NHH)	No	N/A
Last Mile Electricity	No	N/A
SP Energy Networks	No	N/A
SSE Energy Supply Ltd	Yes	<p>We noted in the recent MDD circular 0710 that DNOs/IDNOs are already applying for MDD/ LLFC change, and are concerned that such changes will be approved for subsequent versions of MDD before the outcome of the RFI and further industry impact assessments are known.</p> <p>We anticipate that large scale changes to MDD will have a significant impact to industry systems and processes, and also included references to this in our response to Ofgem's recent Access and Forward Looking Charges consultation. We include key points for further consideration below:</p> <ul style="list-style-type: none">• If the number of LLFCs are to increase significantly we strongly support an approach where the format of the LLFC does not change as the LLFC is used in approximately two dozen flows that populate multiple systems.• Currently, Use of System charge tariffs are input manually into one of our key systems. Increasing the numbers would be unworkable for manual input and so an automated solution would have to be developed. Any automated solution would benefit from a standardised approach to reporting tariffs across DNOs / IDNOs and should be available in a machine readable format to input directly into billing and settlement systems. Another

Respondent	Response	Comment
		<p>option is that tariffs are communicated directly to suppliers via a new 'D' flow.</p> <ul style="list-style-type: none"> It is worth considering whether it may be easier in the longer-term to create new industry data pieces to reflect tariff elements for each MPAN, such as RAG tariff prices, for each RAG time window, for each summer/winter period, for each chosen access option such as firm/non-firm and sharing status. Providing this data directly may be more transparent and reduce the risk of billing errors (either to the supplier, or to the customer), compared with using LLFC as a code to lookup separate data tables to identify what each code means.
Energy Assets Networks	No	N/A
Goto energy (QEEN)	No	N/A
Northern Powergrid	No	N/A
Stark	No	Apart from those issues we have mentioned above already.
Western Power Distribution	Yes	The industry is implementing two large changes – TCR and Faster Switching – for competing resources and time during the April 21 / 22 regulatory year. Does the implementation timing need a rethink?
Scottish Power	Yes	We anticipate resource constraints due to the volume of industry changes being undertaken during these proposed periods.
ENGIE	No	N/A
Electricity North West	Yes	Whilst the questions raised in this RFI are probably valid, we are concerned that Elexon has not raised this earlier. Elexon have been involved at all stages in developing the implementation solution for the TCR and could have raised any issues which potentially will impact delivery a lot earlier in the process.