

# CP Consultation Responses



## CP1507 'Updates to BSCP520 to align with working practices and UMSUG recommendations'

This CP Consultation was issued on 4 June 2018 as part of CPC00788, with responses invited by 29 June 2018.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish & Southern Electricity Networks	1/0	Distributor
Power Data Associates Ltd	0/1	Meter Administrator
E.ON	1/0	Supplier
Electricity North West	1/0	Distributor
Western Power Distribution	1/0	Distributor
Northern Powergrid	1/0	Distributor
SP Distribution SP Manweb	1/0	Distributor

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Scottish & Southern Electricity Networks	✓	✓	✗	✓
Power Data Associates Ltd	✓	✗	✗	✓
E.ON	✓	✓	✓	✓
Electricity North West	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓
Northern Powergrid	✓	✓	✗	✓
SP Distribution SP Manweb	✓	✓	✓	✗

## Question 1: Do you agree with the CP1507 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

### Responses

Respondent	Response	Rationale
Scottish & Southern Electricity Networks	Yes	We agree that UMSUG identified various issues with BSCP 520.
Power Data Associates Ltd	Yes	This CP addresses a number of issues that need resolution and have been thoroughly discussed at UMSUG.
E.ON	Yes	No rationale provided
Electricity North West	Yes	This provides updates to BSCP520 in line with the discussions at UMSUG, reflecting current practice and the proposed amendments for measured CMS inventories.
Western Power Distribution	Yes	We are supportive of the changes to align BSCP520 with working practices in line with UMSUG recommendations.
Northern Powergrid	Yes	Yes, we agree.
SP Distribution SP Manweb	Yes	We believe that the change looks to rectify a number of issues raised by KPMG in their audit findings, and also seeks to incorporate a process for 'Slow' EV charging. We believe that this is a positive step for the UMS area as it provides clarity in the process.

## Question 2: Do you agree that the draft redlining delivers the CP1507 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	1	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
Scottish & Southern Electricity Networks	Yes	SSEN's UMSO has confirmed the timescale is appropriate.
Power Data Associates Ltd	Yes	The proposed wording has benefited from multiple iterations by UMSUG prior to the CP being raised which has enabled suitable text.
E.ON	No	We agree with the general principles of the changes except for question 3 - see below.
Electricity North West	Yes	No rationale provided.
Western Power Distribution	Yes	No rationale provided.
Northern Powergrid	Yes	Yes, we agree.
SP Distribution SP Manweb	Yes	Draft red lining appears to deliver the proposed solution.

### Question 3: Do you agree that the proposed 15WD timescale for UMSOs to validate new and amended UMS inventories is appropriate?

#### Summary

Yes	No	Neutral/No Comment	Other
5	1	0	1

#### Responses

Respondent	Response	Rationale
Scottish & Southern Electricity Networks	Yes	SSEN's UMSO has confirmed the timescale is appropriate.
Power Data Associates Ltd	Yes and No	There is no timescale currently defined. Specifying a timescale is a positive improvement. However, it should be possible to have a timescale less than 10 WD, ideally 5WD. The timescale is to review the customers submission, to reject it highlighting concerns, or if satisfactory to process it. 10WD (or even 5WD) should be an acceptable timeframe. Extended timescales result in delays of customers obtaining feedback on submissions, delays to updated inventories being used in settlement and minimising the need for backdating inventories which causes revised settlement data and customer rebilling.
E.ON	No	Whilst we largely agree with the general principles of the changes, we do feel that some elements are a bit lenient, for example 15 WD to agree inventory we feel a 10 WD SLA would support our supplier risks better, we also feel that an additional step to place a firm SLA on the UMSO to provide supplier with updated inventories would be beneficial.
Electricity North West	Yes	We believe that this is a fair working timescale for validation and amendments of the UMS inventories.
Western Power Distribution	Yes	The 15WD timescale for UMSOs to validate new and amended UMS inventories appears appropriate.
Northern Powergrid	Yes	We agree with the proposed 15 working day timescale and prefer this to the counter proposal of 10 working days.
SP Distribution SP Manweb	Yes	We believe that 15WD provides enough time to validate an (un-rejected) inventory for UMS

Respondent	Response	Rationale
		Customers often provide invalid combinations on the inventory and, supply in a format that is not compliant with the Industry requirements, therefore specification of the rejection procedure in this respect is important.

## Question 4: Will CP1507 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

### Responses

Respondent	Response	Rationale
Scottish & Southern Electricity Networks	Yes	Minimal impact.
Power Data Associates Ltd	No	The changes are aligning the BSCP with the current operational practices. A deadline on the UMSO timescale should enable summaries and control files to be received earlier than currently, which is an improvement.
E.ON	Yes	Low impact on process changes, but feel it will be positive.
Electricity North West	Yes	The main change for ENWL relates to the mCMS changes where we will need to develop new processes to capture and keep separate from the other UMS inventories
Western Power Distribution	Yes	Limited impact to internal processes and supporting documentation.
Northern Powergrid	Yes	Yes, as UMSO we will need to modify our processes and associated documentation to accommodate the changes however, we envisage the impact to be limited.
SP Distribution SP Manweb	Yes	We believe that there will be an impact on current processes, but do not think that this will be significant, or insurmountable.

## Question 5: Will your organisation incur any costs in implementing CP1507?

### Summary

Yes	No	Neutral/No Comment	Other
3	3	0	1

### Responses

Respondent	Response	Rationale
Scottish & Southern Electricity Networks	No	No rationale provided.
Power Data Associates Ltd	No	The changes are aligning the BSCP with the current operational practices
E.ON	Possibly	Dependent on if IT changes are required for MDD updates.
Electricity North West	Yes	This is likely to be incurred in the development of new processes and procedures, and are likely to be one off in nature. There are also likely to be minor marginal increases in terms of ongoing management of the inventories.
Western Power Distribution	Yes	One off costs limited to updating internal processes and documents.
Northern Powergrid	No	n/a
SP Distribution SP Manweb	Yes	While we believe that there may be cost implications we are unable to quantify at this time, however we believe these costs would not be prohibitive and may only be relevant to the changes in 'mCMS' in relation to the EV charging element.

## Question 6: Do you agree with the proposed implementation approach for CP1507?

### Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

### Responses

Respondent	Response	Rationale
Scottish & Southern Electricity Networks	Yes	No rationale provided.
Power Data Associates Ltd	Yes	The changes are mainly documentary and will have no system impacts.
E.ON	Yes	No rationale provided.
Electricity North West	Yes	No rationale provided.
Western Power Distribution	Yes	The implementation approach appears reasonable.
Northern Powergrid	Yes	Yes, we agree.
SP Distribution SP Manweb	No	We believe that the changes/clarity proposed are positive, however we would look to see a longer implementation timeframe in relation to the EV charging and 'Mcms' element of the proposal.

## Question 7: Do you have any further comments on CP1507?

### Summary

Yes	No
2	5

### Responses

Respondent	Response	Comments
Scottish & Southern Electricity Networks	No	No rationale provided.
Power Data Associates Ltd	Yes	<p>The heading 4.6.1 'Hardware -PECU Array' should be after the following text and before the heading of 4.6.1.1. The current text after 4.6.1 gives details of the calculation requirement and are linked to 4.6. It is possible that a heading has got lost, so 4.6.1 should be entitled as something else and current 4.6.1 should be 4.6.2 just before the current 4.6.1.1.</p> <p>This is a further housekeeping change not identified in the earlier UMSUG reviews, as the error is in the current published version. It would seem optimal to include with this change.</p>
E.ON	No	No rationale provided.
Electricity North West	No	No rationale provided.
Western Power Distribution	No	No rationale provided.
Northern Powergrid	Yes	In relation to the EV aspects of the change, we are comfortable with the proposal on the assumption that EV charging portfolios will be on separate inventories i.e. separate to street furniture for example. Separate inventories are important for future inventory control and management of such loads.
SP Distribution SP Manweb	No	No rationale provided.

**BSCP520 'Unmetered Supplies Registered in SMRS'**

No comments were received in regard to the CP1507 draft redlining.