

CP Consultation Responses



CP1547 'Clarification on the Site Specific Line Loss Factor Calculation Process for Embedded Licensed Distribution System Operators'

This CP Consultation was issued on 12 July 2021 as part of the July CPC batch, with responses invited by 6 August 2021.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Energy Assets Networks Ltd	1/0	Distributor
SSEN	1/0	Distributor
SSE Energy Supply Limited	1/0	Supplier

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Energy Assets Networks Ltd	✓	✗	✗	✓
SSEN	✗	✓	✗	✗
SSE Energy Supply Limited	✓	✗	✗	✓

Question 1: Do you agree with the CP1547 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	1	-	-

Responses

Respondent	Response	Rationale
Energy Assets Networks Ltd	Yes	Provides clarity on the process for LDSOs to calculate site specific LLFs in the absence of 12 months of settlement date.
SSEN	No	<p>While we agree with the intent of CP1457, and we agree with the requirement of 12 months data in order to calculation the site specific LLFs, we have difficulty agreeing to the proposed deadline set for embedded LDSOs to submit their site specific LLFs in line with Host DNOs (i.e. September).</p> <p>The reason that we think embedded LDSO's September submission for site specific LLFs would not be ideal is that, these LLFs would not be able to be captured and reflected in Host DNO's site specific (boundary) LLFs calculation, or their generic LLFs calculation process in the same year, which is also September.</p> <p>Our thought is that, should embedded LDSOs publish their site specific LLFs ahead of Host DNO's deadline, say, in July, so that embedded LDSO would be able to provide Host DNO their boundary profile based on their newly calculated LLFs (which are to be applied to their end user metered profiles) in July, and then the Host DNOs will be able to reflect their latest LLFs in their boundary LLFs calculation and Host DNO's generic LLFs calculation in the same year (i.e. September).</p> <p>Nevertheless, had Embedded LDSO publish their site specific LLFs in September, Host DNOs would not be able to capture them (from the boundary profile provided by embedded LDSO) in the same year, but could possibly in the following year.</p>
SSE Energy Supply Limited	Yes	

Question 2: Do you agree that the draft redlining delivers the CP1547 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
2	1	-	-

Responses

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

Respondent	Response	Rationale
Energy Assets Networks Ltd	Yes	N/A
SSEN	No	Rationale as above in Question 1, suggested alternative provided in "CP Redlined Text" section.
SSE Energy Supply Limited	Yes	

Question 3: Will CP1547 impact your organisation?

Summary

High	Medium	Low	None
-	-	1	2

Responses

Respondent	Response	Rationale
Energy Assets Networks Ltd	None	Energy Assets Networks already supports the BSCP128 process for calculating site specific LLFs.
SSEN	Low	Internal process will be adjusted to mind the fact that boundary profile would need to be requested from embedded LDSO so that their site specific LLFs are reflected to our boundary and generic LLFs calculation.
SSE Energy Supply Limited	None	

Question 4: Will your organisation incur any costs in implementing CP1547?

Summary

High	Medium	Low	None
-	-	-	3

Responses

Respondent	Response	Rationale
Energy Assets Networks Ltd	None	N/A
SSEN	None	Minor internal process change, shouldn't incur any real financial costs.
SSE Energy Supply Limited	None	

Question 5: Do you agree with the proposed implementation approach for CP1547?

Summary

Yes	No	Neutral/No Comment	Other
2	1	-	-

Responses

Respondent	Response	Rationale
Energy Assets Networks Ltd	Yes	
SSEN	No	We agree with most of the points in the proposed implementation approach, except where it stated that standard submission deadline should apply for embedded LDSO's methodology and site specific LLFs submission. As explained in our response in Question 1, it may be more ideal that Embedded LDSOs provide their submission ahead of the Host DNO's deadline so that their site specific LLFs could be reflected in their boundary profile submission in the same year, and be captured in Host DNO's losses calculation.
SSE Energy Supply Limited	Yes	

BSCP128

Respondent	Location	Comment
SSEN	3.4 (d)	Alternatively, rather than having "standard deadline for submission", could have "2 months ahead of standard deadline for submission".