

**CPC00662 – Impact Assessment Responses for DCP0041, DCP0042 and DCP0043**

**DCP0041 – Clarifications to Gross Volume Correction (GVC) Process**

Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates</b>	<b>Agreement Yes/No</b>
The Electricity Network Company	Distributor	Neutral
E.ON	Supplier	Yes
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes
EDF Energy	Supplier, NHH Agent and HH MOP	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes
IMServ	NHHDC / NHHDA	Yes
E.ON UK Energy Services Limited	NHHDC/DA	Yes
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes
CE Electric UK	LDSO, UMSO	Accept
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes
G4S AccuRead	NHHDC, NNHDA, MOP	Yes
British Energy	Supplier	Yes
Central Networks	LDSO	Yes
NPower Limited	Supplier, Supplier Agents	No

## Impact Assessment Responses

**Organisation:** E.ON

Response form

Do you agree with the intention of the DCP?		Yes
Comments		
Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted	Supplier	
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?		
Change 1		Yes
Comments		
Change 2		Yes
Comments		
Change 3		Yes
Comments		
Change 4		Yes
Comments		
Change 5		Yes
Comments		
Change 6		Yes
Comments		
Impact on Organisation		
What are the costs to your organisation from the DCP? <sup>1</sup>		
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days		Comments
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?		No
If yes, please provide a high level description of the differences – including ball-park costs where		

<sup>1</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

possible.

**Organisation:** TMA Data Management Ltd

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>		
<b>Change 1</b>		Yes
<b>Comments</b>	GVC should never be used to correct fully crystallised errors.	
<b>Change 2</b>		Yes
<b>Comments</b>		
<b>Change 3</b>		Yes
<b>Comments</b>	Clarification welcome	
<b>Change 4</b>		Yes
<b>Comments</b>	More information on the process of using a dummy meter exchange is required in order to ensure that all NHHDC's follow the same process.	
<b>Change 5</b>		Yes
<b>Comments</b>		
<b>Change 6</b>		Yes
<b>Comments</b>		
<b>Impact on Organisation</b>		
<b>What are the costs to your organisation from the DCP?<sup>2</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		

<sup>2</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

No. of Calendar Days	90	Comments	
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?			No
If yes, please provide a high level description of the differences – including ball-park costs where possible.			

**Organisation:** EDF Energy

Response form

Do you agree with the intention of the DCP? (Please delete as appropriate)		Yes
Comments	Guidance around GVC is and has always been quite open to interpretation, and we support the idea of greater clarity as to which situations require it and which do not. This guidance should be understood by all parties and lead to a consistent approach.	
Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted	NHHDC, Supplier	
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?		
Change 1		No
Comments	Majority of this change is reasonable, but it is too open to interpretation as to whether an error 'affects fluid settlement dates' or has an 'ongoing impact'. These terms need to be clearer as to which scenarios are eligible for GVC. We agree that this needs to be clarified, however, and feel that having the option of GVC should not remove the incentive to identify and resolve Settlement issues prior to RF, but make reasonable provision for errors that could not reasonably have been detected when they were originally created.	
Change 2		Yes
Comments	Pending some revisions to Change 1, this rule would still have to be included.	
Change 3		Yes
Comments	Again, subject to revisions to Change 1, the scenarios when NHHDC can initiate GVC can be captured.	
Change 4		No
Comments	Terms here are too specific, e.g. 'dummy meter exchange'. Overall intention is correct, but agents will adopt different methods to resolve this problem. Essence of this change should be that, where GVC cannot be applied (and a suitable reason is given, as per Change 2 above) then the 'last resort' is essentially to address 'ongoing settlement impact' only, i.e. error is written off but future error is minimised. As this applies mainly to AAs, it is less clear how, e.g., a single reading and erroneous EAC would be addressed.	
Change 5		Yes

<b>Comments</b>	Second paragraph is a little unclear, but we agree with details in first and third paragraphs.		
<b>Change 6</b>			Yes
<b>Comments</b>	This is a quite logical and pragmatic change.		
<b>Impact on Organisation</b>	Some documentation revision.		
<b>What are the costs to your organisation from the DCP?<sup>3</sup></b>	Costs of making these changes to documents are relatively low.		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	30	<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?</b>			No
<b>If yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			

<b>Other Comments:</b>
Whilst above guidance and associated BSCP changes are largely beneficial, they should still allow some scope and 'Intra-hub' flexibility should parties agree a method with which they are all satisfied.

**Organisation:** EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd

Response form

<b>Do you agree with the intention of the DCP?</b>			Yes
<b>Comments</b>			
<b>Are you impacted by the DCP?</b>			Yes
<b>Capacity in which your Organisation is impacted</b>	LDSO		
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>			
<b>Change 1</b>			No
<b>Comments</b>			
<b>Change 2</b>			No
<b>Comments</b>			

<sup>3</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Change 3</b>		Yes
<b>Comments</b>	Any party such as an LDSO should be able to request GVC of the NHHDC where data errors have been identified. This should not be subject to approval from the Supplier. A good example of this would be units identified by a Revenue Protection Service which generally do not fully enter settlement at present.	
<b>Change 4</b>		Yes
<b>Comments</b>		
<b>Change 5</b>		Yes
<b>Comments</b>	Where an LDSO identifies an error they should be able to initiate this and Supplier must comply with the request.	
<b>Change 6</b>		Yes
<b>Comments</b>		
<b>Impact on Organisation</b>		Process Changes
<b>What are the costs to your organisation from the DCP?<sup>4</sup></b>		£5000
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	90	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?</b>		No
<b>If yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		

**Organisation:** IMServ

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>	Yes, we agree with the comments in the CP and took part in the working group discussions.	
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC / NHHDA	
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>		

<sup>4</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Change 1		Yes
Comments		
Change 2		Yes
Comments		
Change 3		Yes
Comments		
Change 4		Yes
Comments		
Change 5		Yes
Comments		
Change 6		Yes
Comments		
Impact on Organisation		Process changes
What are the costs to your organisation from the DCP? <sup>5</sup>		Not known
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	90	Comments
		Rewire procedures and train out
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?		No
If yes, please provide a high level description of the differences – including ball-park costs where possible.		

**Organisation:** E.ON UK Energy Services Limited

Response form

Do you agree with the intention of the DCP? (Please delete as appropriate)		Yes
Comments	We fully agree with the suggested amendment to the purpose of a GVC, particularly as we think this approach is more likely to achieve accuracy at RF rather than introducing total error which potentially would cause forecasting issues. The changes proposed mirror our current practises relating to GVC resolutions.	

<sup>5</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted		NHHDC
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?		
Change 1		Yes
Comments	Agree, this will prevent submitting error in a valid period and also ensure Supplier's focus is increased on identifying errors earlier.	
Change 2		Yes
Comments	Agree – currently reject 20% GVC requests as part of the process which we have adopted	
Change 3		Yes
Comments	Agree, we have agreement that we perform GVC's at the PERQ / validation stage if identified	
Change 4		Yes
Comments	Agree, we already perform these within our current practise	
Change 5		Yes
Comments	Agree, it will encourage supplier's to use current processes available (DISPUTE COS) earlier on	
Change 6		Yes / No
Comments	I think a maximum must be set and possible suggestion would to be install a minimum too as this will prevent possible spikes in consumption?	
Impact on Organisation		Process Changes
What are the costs to your organisation from the DCP? <sup>6</sup>		N/A
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	30	Comments
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?		No
If yes, please provide a high level description of the differences – including ball-park costs where possible.		

<sup>6</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** Scottish and Southern Energy

Response form

Do you agree with the intention of the DCP?		Yes
Comments	We agree with all 6 changes.	
Are you impacted by the DCP?		No
Capacity in which your Organisation is impacted		
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?		
Change 1		Yes
Comments		
Change 2		Yes
Comments		
Change 3		Yes
Comments		
Change 4		Yes
Comments		
Change 5		Yes
Comments		
Change 6		Yes
Comments		
Impact on Organisation		
What are the costs to your organisation from the DCP? <sup>7</sup>		None
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	0	Comments
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?		Yes/No
If yes, please provide a high level description of the differences – including ball-park costs where possible.		

<sup>7</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** CE Electric UK

Response form

<b>Do you agree with the intention of the DCP?</b>		Accept	
<b>Comments</b>			
<b>Are you impacted by the DCP?</b>		No	
<b>Capacity in which your Organisation is impacted</b>	N/A		
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>			
<b>Change 1</b>		Yes	
<b>Comments</b>			
<b>Change 2</b>		Yes	
<b>Comments</b>			
<b>Change 3</b>		Yes	
<b>Comments</b>			
<b>Change 4</b>		Yes	
<b>Comments</b>			
<b>Change 5</b>		Yes	
<b>Comments</b>			
<b>Change 6</b>		Yes	
<b>Comments</b>			
<b>Impact on Organisation</b>		N/A	
<b>What are the costs to your organisation from the DCP?<sup>8</sup></b>		N/A	
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>		<b>Comments</b>	N/A
<b>Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?</b>			No

<sup>8</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

If yes, please provide a high level description of the differences – including ball-park costs where possible.

N/A

**Organisation** Siemens Metering Services

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>		
<b>Change 1</b>		Yes
<b>Comments</b>		
<b>Change 2</b>		Yes
<b>Comments</b>	Siemens Metering Services are in favour of this change. However, we can see a potential issue in situations where the NHHDC refers the GVC request back to the Supplier (believing the request inappropriate), and the Supplier disagrees. In these instances guidance may be required from Elexon in taking the appropriate course of action.	
<b>Change 3</b>		Yes
<b>Comments</b>		
<b>Change 4</b>		Yes
<b>Comments</b>		
<b>Change 5</b>		Yes
<b>Comments</b>	For Change of Supplier Readings, we would like to stress that a CoS Reading error should always be corrected before any GVC is done.	
<b>Change 6</b>		Yes
<b>Comments</b>		
<b>Impact on Organisation</b>		Process impact
<b>What are the costs to your organisation from the DCP?<sup>9</sup></b>		Unsure at this time
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		

<sup>9</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>No. of Calendar Days</b>	90 days	<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?</b>			No
<b>If yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			

<b>Other Comments:</b>
One further comment surrounds the pricing of energy when applying GVC. Historically, dispute materiality was calculated using the price per half hour in which the discrepancy occurred. Does ELEXON have sufficient data to estimate the further error caused by energy discrepancies from early 2000s being calculated at today's prices, and whether a similar 'price at the time' basis could be applied?

**Organisation:** ScottishPower.

Response form

<b>Do you agree with the intention of the DCP?</b>	Yes
<b>Comments</b>	At present Scottish Power endeavour to identify and resolve any issues in relation to Settlement processes prior to the potential application of the GVC process. A direct result of this policy has meant minimal use of the GVC process, and the NHHDC would only run it under instruction from Scottish Power Supply business.
<b>Are you impacted by the DCP?</b>	No
<b>Capacity in which your Organisation is impacted</b>	No Impact
<b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b>	
<b>Change 1</b>	Yes/ No
<b>Comments</b>	
<b>Change 2</b>	Yes/ No
<b>Comments</b>	
<b>Change 3</b>	Yes/ No
<b>Comments</b>	
<b>Change 4</b>	Yes/ No
<b>Comments</b>	
<b>Change 5</b>	Yes/ No
<b>Comments</b>	

Change 6		Yes/ No	
Comments			
Impact on Organisation			
What are the costs to your organisation from the DCP? <sup>10</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days		Comments	
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?			Yes/No
If yes, please provide a high level description of the differences – including ball-park costs where possible.			

**Organisation:** AccuRead

Response form

Do you agree with the intention of the DCP?		Yes	
Comments	Though the intention of the DCP is clear in that GVC is to become a technique used to ensure valid reads are entering settlement for mpans with errors after RF, one of the main changes is unclear as to how it's used.		
Are you impacted by the DCP?		Yes	
Capacity in which your Organisation is impacted		NHHDC	
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?			
Change 1		Yes	
Comments	None		
Change 2		Yes	
Comments	None		
Change 3		Yes	
Comments	None		
Change 4		Yes	
Comments	None		

<sup>10</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Change 5		No
Comments	This change is unclear. While the intent seems correct in that GVC can only be applied to certain supply periods etc the second paragraph is very unclear as to what it is trying to define and seems to mix to separate examples of instances of possible correction into one which only further muddies the waters.	
Change 6		Yes
Comments	Non	
Impact on Organisation		Process Changes
What are the costs to your organisation from the DCP? <sup>11</sup>		N/A
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	90	Comments
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?		No
If yes, please provide a high level description of the differences – including ball-park costs where possible.		

Other Comments:

**Organisation:** British Energy

Response form

Do you agree with the intention of the DCP?		Yes
Comments	We are in support of this DCP because clarification will make the process more robust.	
Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted	Supplier	
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?		
Change 1		Yes
Comments		
Change 2		Yes

<sup>11</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Comments			
Change 3			Yes
Comments	It is essential that this is only carried out in correspondence with the Supplier.		
Change 4			Yes
Comments			
Change 5			Yes
Comments			
Change 6			Yes
Comments			
Impact on Organisation	Process changes		
What are the costs to your organisation from the DCP? <sup>12</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days	90	Comments	
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?			No
If yes, please provide a high level description of the differences – including ball-park costs where possible.			

**Organisation:** Central Networks

Response form

Do you agree with the intention of the DCP?			Yes
Comments			
Are you impacted by the DCP?			Yes
Capacity in which your Organisation is impacted	LDSO		
Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?			
Change 1			Yes

<sup>12</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Comments			
Change 2			Yes
Comments			
Change 3			Yes
Comments			
Change 4			Yes
Comments			
Change 5			Yes
Comments			
Change 6			Yes
Comments			
Impact on Organisation			
What are the costs to your organisation from the DCP? <sup>13</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days	N/A	Comments	
Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?			No
If yes, please provide a high level description of the differences – including ball-park costs where possible.			

<b>Other Comments:</b>
We would support clarification of the use of GVC.

**Organisation:** Npower

Response form

Do you agree with the intention of the DCP?	No
Comments	As noted within the DCP the GVC working Group did not reach agreement on all issues, this was one of them.  The 'do nothing option' should not be excluded as an option in the 'Proposed

<sup>13</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<p>Solution'. To exclude this option, as discussed at the workshops, would mean that industry participants that did not attend workshops may have less understanding around the principles that underpin the original implementation of GVC and therefore maybe less able to make an informed decision on the option of their choice. We believe therefore that the 'Do Nothing' option should be included as a positive indicator that it is the option of choice, rather than assume that all rejections or lack of response to the remaining options indicate a preference to 'do nothing'.</p> <p>Secondly an indication that none of the proposed options is the preferred option does not clearly indicate that a 'do nothing' approach is the preferred option. It could be construed that those parties having no interest are choosing the 'do nothing' approach or that those parties choosing the 'do nothing' approach are construed as having no interest.</p>	
<p><b>Are you impacted by the DCP?</b> Yes</p>	
<p><b>Capacity in which your Organisation is impacted</b> Supplier/NHHDC</p>	
<p><b>Do you agree with the 6 changes outline in the 'Proposed Solution' in the DCP0041 form?</b></p>	
<p><b>Change 1</b> No</p>	
<p><b>Comments</b></p>	<p>We do not believe that the original principles behind the introduction of GVC (as agreed by TS2) should be ignored. The working group did not reach agreement on this point, which is a significant point. We therefore need to understand where an agreement was reached to change what is effectively an underlying principle. The DCP therefore requires an option that describes the reasoning behind the original principle and the ability to apply GVC to achieve that principle. This is not necessarily a 'do nothing' approach but does recognise that the original principle still applies.</p>
<p><b>Change 2</b> No</p>	
<p><b>Comments</b></p>	<p>This change is only relevant if we support Change 1 above.</p>
<p><b>Change 3</b> Yes</p>	
<p><b>Comments</b></p>	
<p><b>Change 4</b> Yes</p>	
<p><b>Comments</b></p>	<p>We agree with the principle of a 'dummy meter exchange' as there are instances where errors or exceptions in the settlement process have no other method of correction. However, we strongly feel that the point at which the process is used should be clearly defined and that it is defined as the method of last resort (for correcting errors or exceptions). This clarification should include the priorities that should be given between the GVC and 'dummy meter exchange processes.</p> <p>As a dummy meter exchange is not visible in the settlement process this change should also include a requirement for an audit trail and that it should regularly fall within the scope of the BSC Audit.</p> <p>Within the "Proposed Solution" of the DCP GVC is also noted as a "corrective technique of last resort". We presume this is an error in the DCP as both the GVC and dummy meter exchange processes can not be one of last resort.</p>

<b>Change 5</b>		No	
<b>Comments</b>	<p>Change 5 presumes that an incorrect Change of Supplier Reading can be amended using the 'agreed read' process. This process is only available to suppliers within 12 months of the COS reading date. It also presumes that there is sufficient read history available to both or either of the suppliers. This is not always the case. No read history means that to revisit the COS reading with an estimated one is ruled out until the exception that created 'no read history' is addressed, usually by the old supplier. That is, the 'agreed read' process is protracted and can be delayed beyond the 12 month period. As no read history is available GVC can not be applied either.</p> <p>The suggestion that it can (within the proposed change 5) is therefore misleading.</p>		
<b>Change 6</b>		Yes	
<b>Comments</b>			
<b>Impact on Organisation</b>			
<b>What are the costs to your organisation from the DCP?<sup>14</sup></b>			
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	186	<b>Comments</b>	Systems and processes will require change.
<b>Is there a difference in impacts, costs and lead times for your organisation depending on which of the 6 suggested changes are progressed?</b>			Yes
<b>If yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
<p>Only changes one and five impact our systems and processes. Amendments to the reporting system that identify the requirements for GVC will need to change. Also the processes for application of GVC will change and this becomes a resource training issue.</p>			
<b>Other Comments:</b>			

<sup>14</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

## **DCP0042 – Replacing Erroneous Forward Looking EACs**

### Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates</b>	<b>Agreement Yes/No</b>
The Electricity Network Company	Distributor	Neutral
E.ON	Supplier	Yes
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes
EDF Energy	Supplier, NHH Agent and HH MOP	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes
E.ON UK Energy Services Limited	NHHDC/DA	Yes
IMServ	NHHDC / NHHDA	Neutral
Npower	Supplier/NHHDC	Yes
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes
CE Electric UK	LDSO, UMSO	Neutral
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes
G4S AccuRead	NHHDC, NNHDA, MOP	Yes
British Energy	Supplier	Yes
Central Networks	LDSO	Neutral

## Impact Assessment Responses

**Organisation:** E.ON

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>		
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 3	
<b>Why is this?</b>		
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	RF 3	
<b>Why is this?</b>		
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>15</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>		<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		Yes/No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>	Neutral	
<b>Why is this?</b>		

<sup>15</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** TMA Data Management Ltd

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 2	
<b>Why is this?</b>	Negative EACs should be replaced as they will cause further validation failure, the replacement of positive "non representative" EAC is too open to interpretation as to what "non representative" is to ensure a common approach by all NHHDC agents.	
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	RF 2	
<b>Why is this?</b>	As above	
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>16</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	90	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
If options REQ3 and RF3 are chosen, the positive EAC selection will add to the complexity of the change and therefore to the cost. it is estimated that it could double the estimated cost to £8K.		
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>		Yes
<b>Why is this?</b>	It would ensure that the EAC is replaced at the moment of calculation and it would also offer one solution instead of having multiple systems requiring modification.	
<b>Other comments</b>		

<sup>16</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** EDF Energy

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>	As a general procedure this is desired by all parties. However, if this solution is applied in NHHDC rather than EAC/AA it is harder to standardise or automate. In our view, this solution needs to use automation as much as possible, but retain flexibility for instances where this may need to be done manually.	
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 1	
<b>Why is this?</b>	We would support using the EAC/AA solution exclusively for negative EACs, but look to develop a method to allow manual replacement of excessive positive EACs.	
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	RF 1	
<b>Why is this?</b>	It is consistent with REQ1 and deeming is handled exclusively by EAC/AA.	
<b>Impact on Organisation of your preferred options?</b>	None for EAC/AA automation, time only to implement new version.	
<b>What are the costs to your organisation of your preferred option?<sup>17</sup></b>	Testing, Support and Implementation costs for new EAC/AA version.	
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	30	<b>Comments</b> Dependent on level of Initial Testing
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
Where replacing of EACs is mandated using a method other than EAC/AA (REQ3, possibly REQ2), we have no existing method and would therefore need to develop, cost and implement an alternative method. This costing exercise has yet to be undertaken.		
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>		Yes
<b>Why is this?</b>	It is simplest, most consistent solution and requires no additional controls to ensure that no negative EACs are passed into NHHDA. Of course class average itself may not be that	

<sup>17</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

representative of real consumption, but impact is less severe. This should not necessary preclude a party from using an alternative method, but there would need to be a robust audit process to identify how such a replacement EAC was obtained.

#### Other comments

As details in Solutions above make several references to using a 'class average or last representative EAC' it implies that a NHHDC agent can make a choice as to which of these to use. If a solution is to be coded into EAC/AA it implies that a class average would always be used. If the intention is to allow a manual alternative in NHHDC to replace negative EACs with 'representative' values, then presumably there should be an option to turn this automation off. That implies REQ1 & RF1 should mandate that one of these methods is used to replace negative EACs, but not necessarily which one. Please can it be clarified whether EAC/AA automation itself will be mandated or whether an agent will be able to use alternate means?

**Organisation:** EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd

#### Response form

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	LDSO	
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		REQ 2
<b>Why is this?</b>	Negative EACs are erroneous and should be excluded from settlement. This options offers simplicity of operation and the removal of subjective judgement made by a party that is likely to benefit from the outcome	
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		RF 2
<b>Why is this?</b>	Negative EACs are erroneous and should be excluded from settlement. This options offers simplicity of operation and the removal of subjective judgement made by a party that is likely to benefit from the outcome	
<b>Impact on Organisation of your preferred options?</b>		Process Changes
<b>What are the costs to your organisation of your preferred option?<sup>18</sup></b>		£5000
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	90	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		No

<sup>18</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

If Yes, please provide a high level description of the differences – including ball-park costs where possible.	
Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:	Yes
Why is this?	This options offers simplicity of operation and the removal of subjective judgement.
Other comments	

**Organisation:** IMServ

Response form

Do you agree with the intention of the DCP? (Please delete as appropriate)	Neutral
Comments	Although there are benefits to getting this right, the industry has dealt with these issues for over ten years without the need for change. Cost and time to change and no immediate urgency to change this and implement new code.
Are you impacted by the DCP?	Yes
Capacity in which your Organisation is impacted	NHHDC
Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?	REQ 1 or REQ 4
Why is this?	REQ 1 – This is the best option of the changes presented as it is the cleanest and easiest to implement. All negatives are easy to identify and the replace with class average is at least consistent and standardised. This cannot be done for positives due to the subjective nature.  The ability to change if required is always useful and we would not want to see this optional process removed hence why we don't like REQ 2.  REQ 3 – too prescriptive and would be very difficult to implement  REQ 4 is always an option hence our neutral overall status.
Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?	RF 1 or RF 5
Why is this?	Same reason as above but whatever is implemented it should be consistent between the two changes for consistency and ease of operating the process.
Impact on Organisation of your preferred options?	
What are the costs to your organisation of your preferred option? <sup>19</sup>	
How much Implementation Notification would be required from receipt of approved redline text	

<sup>19</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>changes?</b>			
<b>No. of Calendar Days</b>	180	<b>Comments</b>	Changes to EAC/AA software need system changes and testing and deployment
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
Degree of system changes and hence time required to test and implement change depending on complexity of the changes			
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>			Yes
<b>Why is this?</b>	If the change needs to be made then it should be standard across all market participants and the development codes will be paid for only once. If changes are required to each DC system then the cost will be higher and different solutions will be developed.		

**Organisation:** Npower

Response form

<b>Do you agree with the intention of the DCP?</b>			Yes
<b>Comments</b>	We believe that this DCP is insufficient in scope in that it should apply to all instances of deemed readings, those as defined in BSCP 504 Appendix 4.5.2. However we agree with replacement of the erroneous forward looking negative EAC.		
<b>Are you impacted by the DCP?</b>			Yes
<b>Capacity in which your Organisation is impacted</b>	Supplier/NHHDC		
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>			REQ 1
<b>Why is this?</b>	Option REQ1 provides a much improved settlement process by mandating the requirement to address negative EAC's that should never occur.		
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>			RF 1
<b>Why is this?</b>	Again this option will improve the settlement process. However we do not agree that the process be automated as the EAC must be derived by the NHHDC and not the EAC/AA calculator.  However, it's usage should be widened to include all instances of deemed readings as listed in Appendix 4.5.2 of BSCP 504.		

<b>Impact on Organisation of your preferred options?</b>			
<b>What are the costs to your organisation of your preferred option?<sup>20</sup></b>			
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	186	<b>Comments</b>	System changes will be required and training of resource in the use of the new process.
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
Mandating the replacement of simply negative EAC's is the simplest and most effective method of improving the settlement process. The other options introduce greater complexity and therefore greater change requirements.			
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>			No
<b>Why is this?</b>	This DCP should be widened to include all instances where deemed readings produce a negative EAC, introducing further improvement to the settlement process.		
<b>Other comments</b>			

**Organisation:** E.ON UK Energy Services Limited

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>	Preferred option 1 within this DCP	
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 1	
<b>Why is this?</b>	Relating to option2 this would impact the possibility of performing a positive GVC, option3 is unfeasible without a definitive positive EAC tolerance level. This Option allows for correction of erroneous eac/aa's with the most flexibility.	
<b>Which of the 5 RF Deeming Options set out in the 'Proposed</b>	RF 1	

<sup>20</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Solution' section of the DCP do you prefer?</b>		
<b>Why is this?</b>	Relating to option2 this would impact the possibility of performing a positive GVC, option3 is unfeasible without a definitive positive EAC tolerance level. Option allows for correction of erroneous eac/aa's with the most flexibility. This may be defaulted at this stage	
<b>Impact on Organisation of your preferred options?</b>	<b>System and process change</b>	
<b>What are the costs to your organisation of your preferred option?<sup>21</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	90 days	<b>Comments</b> Depending on Solution
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		Yes/No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>		Neutral
<b>Why is this?</b>	automation will be applied to every negative EAC which contradicts the statement "clarification should only be replaced where no readings exist that would allow for a further AA that would bring the EAC back "into line""	
<b>Other comments</b>		
Exploration of a D0052 could be beneficial as this would put the onus on the Supplier as a D0052 could be submitted to overwrite the negative EAC where applicable		

**Organisation:** Scottish and Southern Energy

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>		
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		REQ 4

<sup>21</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Why is this?</b>	We believe that this option provides a greater flexibility to DC and Suppliers. The mandatory options would have a significant cost to our systems and processes.		
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	RF 4		
<b>Why is this?</b>	We believe that this option provides a greater flexibility to DC and Suppliers.		
<b>Impact on Organisation of your preferred options?</b>			
<b>What are the costs to your organisation of your preferred option?<sup>22</sup></b>	None		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	0	<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
The mandatory options would have a significant cost to our systems and processes.			
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>			No
<b>Why is this?</b>	Given our preferences, we believe that we should have sight of negative EACs to understand and manually interpret what is happening. Also, it does not appear to be a cost effective solution.		

**Organisation** Siemens Metering Services

Response form

<b>Do you agree with the intention of the DCP?</b>	Yes		
<b>Comments</b>			
<b>Are you impacted by the DCP?</b>	Yes/ No		
<b>Capacity in which your Organisation is impacted</b>			
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 1		
<b>Why is this?</b>	We support Option 1 on both. Negative EACs always cause validation problems and further errors		

<sup>22</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?		RF 1
Why is this?		
Impact on Organisation of your preferred options?	System and process changes	
What are the costs to your organisation of your preferred option? <sup>23</sup>		
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	90	Comments
Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?		Yes/No
If Yes, please provide a high level description of the differences – including ball-park costs where possible.		
Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:		Yes/ No/ Neutral
Why is this?		

**Organisation:** ScottishPower.

Response form

Do you agree with the intention of the DCP?		Yes
Comments	At present Scottish Power endeavour to identify and resolve any issues in relation to Settlement processes prior to the potential application of the GVC process. A direct result of this policy has meant minimal use of the GVC process, and the NHHDC would only run it under instruction from Scottish Power Supply business.	
Are you impacted by the DCP?		No
Capacity in which your Organisation is impacted		
Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?		REQ 3
Why is this?	This option represents the process we would currently adhere to within OAL.	
Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?		RF 3

<sup>23</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Why is this?</b>	This option represents the process we would currently adhere to within OAL.		
<b>Impact on Organisation of your preferred options?</b>			
<b>What are the costs to your organisation of your preferred option?<sup>24</sup></b>			
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>		<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>			Yes/No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>			Neutral
<b>Why is this?</b>			
<b>Other comments</b>			

**Organisation:** AccuRead

Response form

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>	Yes
<b>Comments</b>	AccuRead believe that clarification in this area will be beneficial, particularly if it allows automation of a manual process.
<b>Are you impacted by the DCP? (Please delete as appropriate)</b>	Yes
<b>Capacity in which your Organisation is impacted</b>	NHHDC
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer? (delete as appropriate)</b>	REQ 1
<b>Why is this?</b>	Req 1 is the option that is least open to interpretation and the simplest requirement, This would allow part of the process of correcting unrepresentative EACs to be automated and be predicable, but still allowing some flexibility. If this change was made it is likely that we would replace all negative eacs with class average eacs unless requested otherwise by the supplier – perhaps via a D0052. The suggestion to automate this in the ACAA calculator is a good one.
<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer? (delete as appropriate)</b>	RF 1

<sup>24</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Why is this?</b>	In clarifying and simplifying the replacement of EACs it would be sensible to apply the same rules in all cases. We have read this DCP that REQ 1 (and 2) would apply to all unrepresentative eacs not just those relating to GVC or RF deeming.		
<b>Impact on Organisation of your preferred options?</b>			
<b>What are the costs to your organisation of your preferred option?<sup>25</sup></b>			
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	180	<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
Cost would like be different for the different option dependent on the amount of automation that could be made as a result of the changes.			
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>			Yes
<b>Why is this?</b>	This would seem to be a relatively simple changes and would be implemented consistently across the industry, but would not stop other EAC values being used where more appropriate.		
<b>Other comments</b>			

**Organisation:** British Energy

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	Supplier	
<b>Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	REQ 1	
<b>Why is this?</b>	Replacing a negative EAC with a positive EAC would be beneficial for Settlement and	

<sup>25</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

	provides flexibility.		
Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?			RF 1
Why is this?	Replacing a negative EAC with a positive EAC would be beneficial for Settlement and provides flexibility.		
Impact on Organisation of your preferred options?		Process change	
What are the costs to your organisation of your preferred option? <sup>26</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days	90	Comments	
Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?			No
If Yes, please provide a high level description of the differences – including ball-park costs where possible.			
Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:			Yes
Why is this?	An automated solution would reduce manual error and provide an industry standard.		
Other comments			
Further clarification as to how a Supplier will be notified of replacement EACs is required.			

**Organisation:** Central Networks

Response form

Do you agree with the intention of the DCP?			Neutral
Comments			
Are you impacted by the DCP?			Yes
Capacity in which your Organisation is impacted	LDSO		
Which of the 4 Requirement Options set out in the 'Proposed Solution' section of the DCP do you prefer? (delete as appropriate)			REQ 1
Why is this?	We feel that the replacement of incorrect EACs, whether positive or negative, is beneficial, however there may be reasons for suppliers not wishing to replace positive EACs, for example the need to see how the customer's consumption is going to be in the future and not wanting to make several EAC corrections to rectify one error.		

<sup>26</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>Which of the 5 RF Deeming Options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		RF 5
<b>Why is this?</b>	We cannot support introducing more change at the DF run. Too many industry processes are finalised at RF, including tariff setting and calculation of Line Loss Factors, changing settlements after RF causes errors to ripple through the rest of the industry' processes. We would always seek to minimise changes at PSFR.	
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>27</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	N/A	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options set out in the DCP?</b>		No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Do you agree that an automated solution should be adopted for the replacement of negative EACs using the EAC/AA calculator?:</b>		Yes/ No/ Neutral
<b>Why is this?</b>		
<b>Other comments</b>		

<sup>27</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

## **DCP0043 – Use of Gross Volume Correction in Post Final Settlement Runs (PFSR)**

### Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates</b>	<b>Agreement Yes/No</b>
The Electricity Network Company	Distributor	Neutral
E.ON	Supplier	Yes
TMA Data Management Ltd	NHHDC, NHHDA, HHDC, HHDA	Yes
EDF Energy	Supplier, NHH Agent and HH MOP	Yes
EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd	LDSO, SMRS, UMSO	Yes
IMServ	NHHDC / NHHDA	Yes
E.ON UK Energy Services Limited	NHHDC/DA	yes
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes
CE Electric UK	LDSO, UMSO	Neutral
Siemens Metering Services	NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO	Yes
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes
G4S AccuRead	NHHDC, NNHDA, MOP	Yes
British Energy	Supplier	Neutral
Central Networks	LDSO	Yes
Npower	Supplier/NHHDC	No

**Impact Assessment Responses**

**Organisation:** E.ON

Response form

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>		
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		Option 1
<b>Why is this?</b>		
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>28</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>		<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>		Yes/No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Other comments</b>		

**Organisation:** TMA Data Management Ltd

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes
<b>Comments</b>		
<b>Are you impacted by the DCP?</b>		Yes

<sup>28</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Capacity in which your Organisation is impacted		NHHDC	
Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?			Option 1
Why is this?	The deeming at or close to the latest RF date not taking into account whether the GSP group might be in a trading dispute or not, is the only viable solution to have a consistent approach.		
Impact on Organisation of your preferred options?			
What are the costs to your organisation of your preferred option? <sup>29</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days	90	Comments	
Is there a difference in impacts, costs and lead times for your organisation under the other options?			No
If Yes, please provide a high level description of the differences – including ball-park costs where possible.			
Other comments			

**Organisation:** EDF Energy

Response form

Do you agree with the intention of the DCP?		Yes	
Comments	It is agreed that this point requires clarification before either option can be mandated.		
Are you impacted by the DCP? (Please delete as appropriate)		No	
Capacity in which your Organisation is impacted		NHHDC	
Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?			Option 1
Why is this?	Our system currently use Option 1 based on many of the reasons raised in this DCP.		
Impact on Organisation of your preferred options?		None	
What are the costs to your organisation of your preferred option? <sup>30</sup>		None	

<sup>29</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	0 or 60	<b>Comments</b>	Time would be required if option 1 was not chosen.
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
Review and Update all relevant GVC procedures, communication of new material, all of which would then in theory revert back to how they were originally if a GSP group were to exit the PFSR process. Also, in the event that one GSP (e.g. SWEB) were to exit, it would mean inconsistent procedures across our key regions.			
<b>Other comments</b>			
As we support the aim of TDC to ultimately not require a PFSR, only effective means to demonstrate that NHHDCs and other parties can function without it is to minimise changes to settlement dates in between RF and DF runs. Continuing with Option 2 in our view only perpetuates a reliance on the PFSR.			

**Organisation:** EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd

Response form

<b>Do you agree with the intention of the DCP?</b>			Yes
<b>Comments</b>			
<b>Are you impacted by the DCP?</b>			Yes
<b>Capacity in which your Organisation is impacted</b>	LDSO		
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		Option 3	
<b>Why is this?</b>	This option provides the best opportunity for the data to be the most accurate rather than the simpler option 1.		
<b>Impact on Organisation of your preferred options?</b>	Process		
<b>What are the costs to your organisation of your preferred option?<sup>31</sup></b>	£5000		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	90	<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation under the</b>			No

<sup>30</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<sup>31</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>other options?</b>	
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>	

**Organisation:** IMServ

Response form

<b>Draft Change Proposal Impact Assessment Form</b>	<b>DCP No:</b>	<b>0043</b>
<b>Title:</b>	Use of Gross Volume Correction in Post Final Settlement Runs (PFSR)	

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>	Yes
<b>Comments</b>	Was part of the original working group so agree
<b>Are you impacted by the DCP? (Please delete as appropriate)</b>	Yes
<b>Capacity in which your Organisation is impacted (e.g. Supplier, HHDC, etc)</b>	NHHDC/ NHHDA
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer? (delete as appropriate)</b>	Option 1
<b>Why is this?</b>	Best option and agree with TDC
<b>Impact on Organisation of your preferred options? (e.g. systems/process changes)</b>	<b>Process changes</b>
<b>What are the costs to your organisation of your preferred option?<sup>32</sup></b>	<b>Not known at this stage</b>
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>	
<b>No. of Calendar Days</b>	90
<b>Comments</b>	Process changes only so training required
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options? (delete as appropriate)</b>	No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>	
<b>Other comments</b>	

<sup>32</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** E.ON UK Energy Services Limited

Response form

<b>Do you agree with the intention of the DCP?</b>		Yes	
<b>Comments</b>	We agree a standard set approach would be better		
<b>Are you impacted by the DCP?</b>		Yes	
<b>Capacity in which your Organisation is impacted</b>	NHHDC		
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	Option 2		
<b>Why is this?</b>	Don't agree with option 1 due to the potential settlement impact (circa 200 p/w currently) and Potential reduction in usefulness of DF period leading up to RF, additionally under current practises we will be introducing large volumes of error at RF where the MPAN(s) is actually already valid by this settlement date plus the likelihood of having sufficient evidence to perform a correction will be reduced. Option 3 is current process however would like to see a standardised approach throughout.		
<b>Impact on Organisation of your preferred options?</b>	<b>Process Change and resourcing if option 1</b> <b>Option 2 NO IMPACT</b>		
<b>What are the costs to your organisation of your preferred option?<sup>33</sup></b>			
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>			
<b>No. of Calendar Days</b>	60 days	<b>Comments</b>	Training written / scenarios tested and comms relating to approach we are taking
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>			Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
One requires training / testing and comms set-up, other option reflects current process used			
<b>Other comments</b>			
Option 2 reflects the guidance of Elexon across the industry, mainly reduces the impact on RF and extends time period for identifying and correcting errors. Option 1 could be supported providing that the changes in DCP00041 were implemented as this would significantly reduce the impact on RF performance. An Additional clarification would be required to advise what we would do in the change period? (Current process – agreed new method. What actions would be expected in the interim period?)			

<sup>33</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** Scottish and Southern Energy

Response form

Do you agree with the intention of the DCP?		Yes
Comments		
Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted		
Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?	Option 1	
Why is this?	We would prefer Option 1 because we believe that it is not wise to encourage data change after RF. Currently our two host GSP groups are not in DF process and another 3 are coming out; will this not bring these back in the dispute runs?	
Impact on Organisation of your preferred options?		
What are the costs to your organisation of your preferred option? <sup>34</sup>	None	
How much Implementation Notification would be required from receipt of approved redline text changes?		
No. of Calendar Days	0	Comments
Is there a difference in impacts, costs and lead times for your organisation under the other options?		Yes/No
If Yes, please provide a high level description of the differences – including ball-park costs where possible.		
Other comments		

**Organisation** Siemens Metering Services

Response form

Do you agree with the intention of the DCP?		Yes
Comments		
Are you impacted by the DCP?		Yes
Capacity in which your Organisation is impacted	NHHDC	

<sup>34</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?		Option 2	
Why is this?			
Impact on Organisation of your preferred options?			
What are the costs to your organisation of your preferred option? <sup>35</sup>		unknown	
How much Implementation Notification would be required from receipt of approved redline text changes?			
No. of Calendar Days	90	Comments	
Is there a difference in impacts, costs and lead times for your organisation under the other options?			Yes/No
If Yes, please provide a high level description of the differences – including ball-park costs where possible.			

**Organisation:** ScottishPower

Response form

Do you agree with the intention of the DCP? (Please delete as appropriate)		Neutral	
Comments	At present Scottish Power endeavour to identify and resolve any issues in relation to Settlement processes prior to the potential application of the GVC process. A direct result of this policy has meant minimal use of the GVC process, and the NHHDC would only run it under instruction from Scottish Power Supply business.		
Are you impacted by the DCP?		No	
Capacity in which your Organisation is impacted			
Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?		Option 1/ Option 2/ Option 2	
Why is this?			
Impact on Organisation of your preferred options?			
What are the costs to your organisation of your preferred option? <sup>36</sup>			
How much Implementation Notification would be required from receipt of approved redline text changes?			

<sup>35</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<sup>36</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

<b>No. of Calendar Days</b>		<b>Comments</b>	
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>			<b>Yes/No</b>
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>			
<b>Other comments</b>			

**Organisation:** AccuRead

Response form

<b>Do you agree with the intention of the DCP?</b>		<b>Yes</b>
<b>Comments</b>	This clarification is very helpful.	
<b>Are you impacted by the DCP?</b>		<b>Yes</b>
<b>Capacity in which your Organisation is impacted</b>	NHHDC	
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		Option 1
<b>Why is this?</b>	Option 1 makes it very clear where the error freezing read should be, the advantages list in the DCP seem to outway the benefits of allowing error freezing at PFSR. However GVC may be appropriate at PFSR in the rare cases of mpans involved in disputes (ie on the High EAC AA report).	
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>37</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	30	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>		<b>No</b>
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Other comments</b>		

<sup>37</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

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**Organisation:** Central Networks

Response form

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>		Yes
<b>Comments</b>		
<hr/>		
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	LDSO	
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>	Option 1	
<b>Why is this?</b>	We would seek to reduce changes between RF and PSFR as far as possible due to the impact of changes at PSFR on our own processes.	
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>38</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	N/A	<b>Comments</b>
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>		No
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<b>Other comments</b>		

<sup>38</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.

**Organisation:** Npower

Response form

<b>Do you agree with the intention of the DCP? (Please delete as appropriate)</b>		No
<b>Comments</b>	<p>We feel that the options set out in this DCP do not reflect the current use of PFSRs. Currently data correction can only be carried out at PFSR if an MPAN is subject to a trading dispute (therefore be on the Erroneous Large EAC/AA list or have an individual trading dispute raised). This seems to have been forgotten in these options (2&amp;3) and gives the impression that if the industry adopted either Option 2 or 3 then any MPAN (within a GSP group that is subject to PFSRs), can carry out GVC at the PFSR boundary regardless of whether it is subject to a trading dispute.</p> <p>Is this the intention of this change, or is further clarity required for the CP?</p>	
<b>Are you impacted by the DCP?</b>		Yes
<b>Capacity in which your Organisation is impacted</b>	Supplier/NHHDC	
<b>Which of the 3 options set out in the 'Proposed Solution' section of the DCP do you prefer?</b>		None
<b>Why is this?</b>	This choice can not be made without understanding the future of the Post Final Settlement Run.	
<b>Impact on Organisation of your preferred options?</b>		
<b>What are the costs to your organisation of your preferred option?<sup>39</sup></b>		
<b>How much Implementation Notification would be required from receipt of approved redline text changes?</b>		
<b>No. of Calendar Days</b>	183	<b>Comments</b> Potential changes to Supplier and NHH DC systems.
<b>Is there a difference in impacts, costs and lead times for your organisation under the other options?</b>		Yes
<b>If Yes, please provide a high level description of the differences – including ball-park costs where possible.</b>		
<p>Dependent upon the clarification requested above, in terms of the future usage of PFSR's, there are potential changes to both supplier and NHHDC Erroneously Large EAC and AA processes. Without this understanding it is possible to choose a solution that creates a dependency between GVC and PFSR. The choice would tend to undermine the Trading Dispute process.</p>		
<b>Other comments</b>		

<sup>39</sup> If you would like any details to remain confidential and only for use by the Panel/Panel Committees when making a decision please indicate accordingly.