

Stage 03: Attachment A: Detailed Assessment for P280

P280 Introduction of New Measurement Classes

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

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About this document:

This is Attachment A to the P280 Assessment Consultation Document. It provides additional details of the Modification Group's analysis and assessment.

1 Terms of Reference

P280 Terms of Reference(ToR)

The standard ToR for Modification Groups is available on the [ELEXON](#) website. The panel confirmed that the Modification Group should consider the points below.

Specific areas set by the Panel in the P280 Terms of Reference

Development of the P280 Proposed solution.

Changes to BSC documentation, systems and processes needed to support P280 implementation.

Any alternative approach.

Materiality of the issue identified by P280.

Assessment of P280 against the Applicable BSC Objectives

Quantification of P280 costs and benefits where possible (where not already covered by DCUSA).

Impact on industry participants.

Inclusion of Profile Classes 5-8.

Consider mandating Supplier to use the new Measurement Classes.



Any questions?

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P280
Detailed Assessment

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2 Related Industry Work

Modification P280 is not dependent on any other BSC Modification Proposal or other industry change, but work is being carried out in areas related to P280. Though the P280 Workgroup's assessment of P280 is against the BSC baseline and in terms of the Applicable BSC Objectives, considerations around these related pieces of work inform the context in which the group operates. This section therefore sets out updates on relevant work.

P272 Update

Modification P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8' is currently progressing through the Modification process. At the BSC Panel meeting on the 12th of January the Panel decided not to progress P272 to Report Phase and agreed to keep it in the Assessment Procedure.

The Panel noted concerns from Ofgem that the difficulty in assessing the benefits of P272 would make it difficult to make a determination on the Modification. Furthermore, developments in the market over the coming year may make some of the 'known unknowns' known; and at that stage the Modification Group would be better placed to complete analysis and make a recommendation to the Panel.

The Panel agreed with this and noted that they would like to see more done to clarify both the quantitative and qualitative benefits of the Modification, in particular the qualitative benefits.

As such Ofgem will be presenting a 'road map' to the March Panel which will include:

- what analysis will need to be undertaken,
- What assumptions and available data should be used; and
- the timescales involved.

ELEXON will also present a list of quantitative benefits that could be explored by the Group.

DCP 103 Update

DCP 103 was raised by British Gas back in July 2011 to support their early trial of Smart metering. The aim of this DCUSA CP was to mandate a change that would ensure that below 100KW DUOS customer charges would be the same regardless of whether they were settled HH or NHH. Currently there is a difference in the pricing structure depending on how the customer is Settled even though the customer still uses the same amount of consumption.

The DCP 103 Working group highlighted two specific issues.

- Firstly the current billing system for HH Settled customers is Site-Specific and is widely regarded throughout the industry as not being capable of dealing with a substantial increase in HH DUoS bills due to system capacity constraints.

- Secondly, the fact that in a small minority of cases the impact of the DCP may result in some customers being charged more i.e. the current HH tariff is more beneficial than the equivalent NHH charges being applied.

To address these issues the DCP 103 Working group looked at a 4 different solutions.

Option 1 – Reflect NHH Tariffs in HH Billing Systems

In this option, the current NHH tariffs (unrestricted and day/night) would be set up in HH billing systems (with a zero capacity charge), so that customers can be moved into HH settlement without disrupting their DUoS charges. No changes would be made to data flows i.e. DNOs receive site-specific data from HHDCs (on a D0036/D0275) and send site-specific billing data to Suppliers.

This option requires CDCM changes, to allow NHH tariffs to be applied to certain HH-settled customers, and it would require new LLFCs to be set up in MDD.

Option 2 – DNOs provide aggregated billing data to Suppliers

This is a variant of option 1, in which DNOs still receive site-specific data from HHDCs (on a D0036/D0275), but send aggregated billing data to the Supplier. This means the Supplier (but not the DNO) is shielded from receiving a high-volume of site-specific data.

The potential downside for Suppliers is more difficulty in validation of DUoS charges. This would result in no changes to the BSC, but possible changes to the flows used by DNOs to invoice Suppliers for HH DUoS charges.

Option 3 – Aggregated Billing Data from SVAA (on existing D0030)

In this option, SVAA aggregates data for relevant HH customers and includes it on the D0030, and (it was suggested) HHDCs would not send D0036/D0275 data to the DNO for these customers.

As with option 1, there's a question over which customers to include in scope:

- Option 3A – the simplest option (from a system viewpoint) is probably to include the whole of Measurement Class 'E'
- Option 3B - as for option 1, a Workgroup member had a view that customers with CT/VT metering (i.e. PC5-8) should still have an agreed capacity, and be charged on conventional HH tariffs. This potentially requires us to introduce a new Measurement Class, so that traditional Measurement Class 'E' still gets reported on HH data flows, and only the new Measurement Class is reported on the D0030. This means a bigger system change for Suppliers and Supplier Agents.¹

Under both 3A and 3B, the aggregated HH data would appear in the same D0030 as the NHH data (under the new LLFCs introduced for this purpose). Options 3A and 3B both require changes to SVAA and to HHDCs / HHDAs (unless we allow the HHDCs to carry on sending D0036/D0275 flows). It is suspected that they will also both require changes to the BSC. It seems unlikely that either variant is deliverable for April 2012.

¹ This is the opinion of the DCP103 group, a member of the P280 group disagrees with this assessment.

As well as the normal D0030, the change would also apply to the pseudo-D0030s introduced for P246.

Option 4 – Aggregated Billing Data from SVAA (on new flows)

A minor variant of option 3, in which SVAA reports aggregated HH data on new flows (rather than the existing D0030 and P246 pseudo-D0030).

DCP103 current progression

The Workgroup are currently exploring Option 1 as they believe this meets the intent of the change proposal. The majority agreed that option 4 was the preferred approach but this did not meet the intent of the change proposal. This preferred approach and the proposer's view that any capacity constraint may be anti-competitive was the basis for the P280 Solution (be it by using existing flows or new ones to facilitate the use of aggregated HH billing data).

A P280 Workgroup member queried whether the DCP 103 Workgroup had considered a Solution where the HHDA would see singular MPANS but the HHDC would aggregate these into a 'Super MPAN'?

DCP 103 had not considered this option as it was set up primarily to examine the current processes. However, it was felt that this Solution is similar to P280 with the only difference being that the DA would be aggregating rather than central systems.

Update from Latest DCP 103 Teleconference

Ofgem is seeking information on the impact that DCP 103 will have on those customers that are currently elective HH but will see their current tariff no longer available if this proposal is implemented. There is a concern regarding customers on Measurement Class E who may be better off remaining on the current HH DUoS tariff.

Some members of the Workgroup have raised concerns that it could be anti competitive and because of this the group are seeking legal advice on the grounds of whether any form of constraint of trade is deemed anti-competitive. Parties have a Licence obligation not to restrict, prevent or distort competition.

Progression Timeline

The original intent of DCP 103 was to have the Solution implemented as of the 1st April 2012. However, this is simply not possible now. British Gas, the Proposer of DCP 103, is now aiming to implement the DCP by October 2012.

Profile Class 5-8 considerations in related work

The Proposer noted that several ongoing initiatives relate particularly to Profile Classes 5-8 and summarised these to the group. This information can be found in Section 4.

Background

This Modification has been raised to build upon previous work such as Modification P272 which is examining Settling PC 5-8 customers Half-Hourly. Additionally, the PSRG has conducted Cost Benefit Analysis on Settling PC 1-4 customers Half-Hourly and has proposed new Measurement Classes as a result, the PSRG also gained feedback on when HH should be mandated.

Furthermore DCUSA Change Proposal 103 was raised by British Gas to ascertain the impacts of customers using smart meters. However, this has a very limited scope, and is considering only using Measurement Class E to ensure the same DUoS prices for HH Settled customers as those in the NHH settled market. The Proposer highlighted that the RFI supported a new Measurement Class but this was not within the intent of the Change Proposal, also it has been highlighted that DNOs have system capacity issues and there is concern that there would be significant industry costs if this became the enduring solution.

BSC Issue

The Proposer stated that currently the only option available to the industry is to settle HH Domestic and SME markets on a site specific basis, highlighting that the Code allows DNOs to receive metering data (L5.2.4). However, DNOs do not receive aggregated HH data, instead receiving HH data on a site specific basis. Moving forward the proposer believes that existing aggregated HH data flows would not be fit for purpose as the DNOs are not identified within the various flows and neither are the LLFC Id (DUoS codes).

Furthermore, there is general consensus which stems from the PSRG work and the P272 Modification that Industry, both DNOs and Suppliers would prefer to have DUoS billing undertaken on an aggregated basis for sub 100kW sites. Additionally, the consultation responses that were returned to DCP 103 group highlighted that to produce individual site specific DUoS invoices for these customers would be disproportionately expensive.

Justification

The Proposer believes that the modification allows for a more cost effective solution for handling smart metering HH data. Whilst ensuring that those ready to move into this market have the necessary systems and processes in place. Moreover Suppliers would be able to do so without constraint or time delays.

The Proposer believes that due to the above considerations the proposed modification therefore better facilitates Applicable BSC Objective (c) (the promotion of effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity).

4 Development of Solution Requirements

The following section details the Work Group discussions and conclusions that resulted in the P280 solution requirements set out in the main document. Note that the agreements documented below were subject to some refinement in the development of the finalised solution requirements for consultation.

Profile Class 5-8 considerations

Related work

As background to P280 the Proposer noted that several on-going initiatives relate to Profile Classes 5-8. These projects are at different stages of development and cover various specific requirements surrounding settlement of PC 5-8, as summarised below:

DCP103:

- Meeting held 11 Jan 2012
- Implementation likely to be October 2012 (subject to approval)
- HH billing Site-specific billing is available now for all however, there are is not that much take up due to the generally higher DuoS charge.

P272:

- Submission to BSC Panel 12 Jan 2012
- Recommendation is to reject both options
- Implementation April 2014/15 (subject to approval)
- Mandatory HH site specific settlement option rejected (one of the reasons being awaiting outcome of MIG22) by the group, however, this Modification is now staying in the Assessment stage, with further analysis to be conducted.

MIG 22:

- Still at model review stage
- Unknown as to whether outcome of charging review will be NHH Aggregated, NHH site specific, HH site specific or HH Aggregated
- Implementation planned for April 2013 (subject to approval)
- Unknown as to whether outcome of charging review will be NHH Aggregated, NHH site specific, HH site specific or HH Aggregated.

Options surrounding the inclusion of Profile Class 5-8 in P280

The Proposer's views on the pros and cons of the inclusion of PC 5-8 in the scope of the P280 solution, for consideration by the Workgroup, are as follows:

In Scope:

Pros

- By including HH aggregation for PCs 5-8 we future proof the outcome of any further change in this area.
- Allows for early movers where suppliers (and their agents) are ready to do so.
- No need to wait for outcome of other initiatives.
- It may assist early delivery of other initiatives by having either option (Site Specific or aggregation) available to choose from.

Cons

- We end up with a further BSC change to remove a redundant Measurement Class (outcome is likely to support HH site specific, HH aggregation but not both).
- If outcome is for site specific then change of Measurement Class is required.

Out of scope:

Pros

- Let's other initiatives determine whether this is a requirement.
- Focuses on the original scope of the Modification.
- No further BSC change needed if outcome is use of HH site specific Measurement Class.

Cons

- A further BSC change required if outcome of other initiatives are in support of an aggregated Measurement Class.
- may delay implementation of other initiatives due to additional Modification required.

The Proposer felt that the pragmatic view is to include PC 5-8 in P280 and tailor the Modification so that any future change is housekeeping. The governance on whether it is likely to be site specific or aggregated will be determined by DCUSA and the Use of System Charging Methodology.

Proposed Measurement Classes

The Proposer suggested keeping the existing Measurement Classes the same.

- A Non Half Hourly aggregated metered (PC1-8)
- B Non Half Hourly aggregated unmetered (PC1,8)
- C Half Hourly Site Specific metered (above 100kW Premises)
- D Half Hourly Site Specific unmetered
- E Elective Half Hourly site specific metered (below 100kW Premises)

However, he proposed three new Measurement classes.

- F Half Hourly aggregated metered Domestic (ex PC1-2)
- G Half Hourly aggregated metered Small Medium Enterprise (ex PC3-4)
- H Elective Half Hourly aggregated metered I&C (ex PC 5-8)

The Proposer noted that there will be a need to determine the threshold that would necessitate a move from Measurement Class G to Measurement Class E or Measurement Class H. The suggestion in the Modification is where there is a requirement to install CT metering equipment to replace whole current metering.

Definition/thresholds for new Measurement Classes

A workgroup member asked under the current proposal whether it would be possible for an SME customer to choose to have HH Site Specific billing should they want it. It was discussed and agreed that this would be dependent on the outcome of the I&C (Industrial & Commercial) group. However PC 5-8 customers will have that option under Measurement Class E as they do currently.

It was queried whether when installing AMR meters for I&C customers whether or not those customers are also fitted with a Current Transformers (CT) and therefore whether we will need a different definition between SME and I&C customers?

It was argued that perhaps the group should use the current definitions; (ex profiles classes) whilst other members of the group felt that the definition should be based upon which type of metering was installed as long as that information was readily available.

It was noted that the existing criteria is that if you have a maximum demand meter installed you must be a Profile Class 5-8 customer. However, the use of maximum demand may not be applicable in the HH Settled market as HH capable Meters don't necessarily utilise Maximum Demand in the same way.

A group member queried whether it mattered which of the new Measurement Classes a customer is placed upon, and it was highlighted that each Measurement Class will relate to a specific DUoS charge.

The group agreed that a new mechanism was needed as the current mechanism i.e. the Maximum Demand register would not be applicable in the HH Settled Market and that the issue with defining which Measurement Class should be used would be with the former Profile Class 3-4 and 5-8 customers as there currently isn't a clear identifier on the metering side due to the fact that the PCs 3 & 4 will receive smart meters; PCs 5-8 will receive advanced meters.

It was stated that the threshold shouldn't be based upon capacity as an AMR meter can be installed at sites with whole current or CT measuring equipment.

Group Conclusions:

The group agreed that the threshold should be based upon the type of measurement device installed.

New Measurement Classes:

- F Half Hourly aggregated metered (Domestic)
- G Half Hourly aggregated metered (Non domestic whole current)
- H Elective Half Hourly aggregated metered I&C (Non domestic CT metered)

Requirement 1 – Introduction of new Measurement Classes

As highlighted above the Proposer when raising P280 believed that two new Measurement Classes would be appropriate; one for Domestic Customers and one for Non-Domestic Customers below an agreed size threshold. The Group considered the inclusion of Profile Classes 5-8, and whether this was a practical approach or whether the group should consider an additional Measurement Class for Profile Classes 5-8 as discussed.

The Group were also asked to consider what threshold the new Measurement Classes should apply to. The Proposer suggested that the absence of measurement transformers could be used as the criterion i.e. the new Measurement Classes would be open only to customers with whole current metering. His belief being that this supports the National Terms of Connection (DCUSA Schedule 2B) where the use of measurement transformers require a different set of terms one of which is the requirement for a maximum capacity.

This then links to Profile Class 5-8 where a maximum capacity is also required. This ensures that there is no overlap with the work on P272 (Mandatory Half Hourly Settlement for Profile Classes 5-8).

The overall idea with regards to the reporting side is for these new Measurement Classes to look the same as the current NHH report. To achieve this certain measures will need to be taken including:

- Adding additional information to the Market Domain Data (MDD).
- For each of the three new Measurement Classes there will be 2 / 4 new Consumption Component Classes (CCC) that the SVAA will need to add to as each new Measurement Class will have a number of CCCs associated with this.

The reasoning behind the new CCCs is that these will enable the SVAA to undertake the relevant aggregation to incorporate in the D0030. Currently each Measurement Class has associated CCCs and the Data Aggregator breaks the data down by these CCCs. Therefore any new Measurement Classes will need new CCCs associated with them.

The group agreed that new Line Loss Factors (LLFs) should be raised through the existing process.

The group discussed the impact on Suppliers and there was a concern that Suppliers may be swamped with data from the HHDCs. However, the proposer highlighted that it was up to Supplier's discretion as and when they choose to use the new Measurement Classes. This enables Suppliers to ensure that they have systems in place. Additionally Suppliers will have the choice as they do now as to what flows they will receive from the HHDC.

Group Conclusions:

The Group considered that, with effect from 31 March 2013, three new Measurement Classes for domestic, Small Medium Enterprises (SME) and Industrial and Commercial (I&C) customers should be introduced under the BSC. These new Measurement Classes would distinguish HH Settled customers whose network charges should be calculated on an aggregated basis.

New Measurement Classes:

- F Half Hourly aggregated metered (Domestic)
- G Half Hourly aggregated metered (Non domestic whole current)
- H Elective Half Hourly aggregated metered I&C (Non domestic CT metered)

This will result in the need for each new Measurement Class and their associated CCC being updated in the Market Domain Data (MDD).

The Supplier Metering Registration Service (SMRS) systems will need to be capable of accepting the new Measurement Classes.

Suppliers will have the option of utilising the new Measurement Classes and Supplier Agents will need to be able to process the new Measurement Classes for those Suppliers who choose to use them.

Requirement 2 – Introducing new data flows that replicate the D0040 and D0298 data flows

The group considered what would be involved in changing the format of the D0040/298 sent from HHDA to SVAA.

The group noted that it was crucial that the SVAA are capable of interpreting which DNO it will be reporting to and which LLFCs the aggregated data applies to. Currently the SVAA does not have the ability to determine this from the existing D0040/0298 flows.

The group also stated that as the Modification was not going to mandate that Suppliers use these new Measurement Classes that it was paramount that instead of amending the flows as was originally suggested that instead there would be a need to introduce new flows that would replicate the existing D0040 and D0298 flows.

This would include details of Distributor Id and Line Loss Factor Class Id. The purpose of this would enable the SVAA to know which DNO to report the consumption too, and would then allow the DNO to know which tariff to apply (assuming that they have more than 1 option).

The impacts of this requirement would necessitate a change to the DTC, as well as the HHDA systems, Suppliers will need to introduce some corresponding system changes. The Group agreed the impact of these changes on parties would be specifically sought in the consultation document.

A workgroup member queried whether P280 should ensure that all HHDA's utilise these flows. The group's view was that it should be down to the Supplier to ensure that their perspective agents are ready for when the Supplier wishes to use the new Measurement Classes.

The group stated that they didn't see the need to mandate the HHDA's given that the new Measurement Classes are specifically for aggregated billing therefore they can only be used in combination with the new flows. For clarification a group member highlighted that any customer set up for Site Specific billing would not be able to utilise the new flows.

Group Conclusions:

The group concluded that the original D0040/D00298 flows would need to remain for those Suppliers who choose not to use the new Measurement Classes and therefore the existing flows will still be available.

Additionally new flows will be introduced with the equivalent data for the new Measurement Classes. Data Aggregators will be able to send different flows (existing and new flows) to different Suppliers on a case by case basis.

Requirement 3 – Processing the new D0040/D0298 data into the existing D0030 and D0314 data flows

Input LLFC		Effective Date	Output SSC/PC	
Distributor	LLFC		SSC	PC
XXXX	200	31-03-2013	0393	1
XXXX	201	31-03-2013	0151	1
XXXX	400	31-03-2013	0393	4
XXXX	401	31-03-2013	0151	4
XXXX		31-03-2013	0151	1

The group discussed the impacts of this requirement with regards to industry participants.

- SVAA – would need to populate the data structure.
- DNOs – it was argued that there would be less in the way of change for them due to the fact that they already process the D0030 flow.

A workgroup member noted that should DNOs want the D0030 format then the SVAA would add the SSCs. Additionally Suppliers will need to know what each SSC relates to.

As a result of this discussion it was asked whether the SSC should be included into the MDD. It was proposed that for each new Measurement Class we could create a pseudo SSC. A workgroup member however, highlighted that for each SSC there are up to 50 TPRs.

However, the group also discussed the possibility of creating TPRs corresponding to the new LLFCs specific for the new Measurement Classes. It is necessary to do this because some DNOs take values from the VMR record whilst others use the SPX data therefore the group must ensure that both are allowed under the D0030 flow.

Additional options considered included creating one report against all 50 TPRS or ensuring that the DNOs aggregate this information. Some members stated that they would prefer receiving all 50 TPRs whilst other favoured the option of allowing DNOs to essentially pick and choose which TPRs they receive, this would mean that the DNOs would advise the SVAA of which TPRs they would like to receive and the SVAA system would be set up in such a way as to provide this information.

The below is a strawman solution suggested by a group member.

The D0030 flow reports consumption to DNOs by Supplier Id, GSP Group Id, Profile Class Id, LLFC Id, SSC Id and TPR Id. It does this both as both total kWh for the settlement day and run type (in the VMR group) and as kWh in each half hour period for the settlement day and run type (in the SPX group).

Different DNOs billing systems utilise either the SPX or the VMR group data to produce the DUoS invoices hence the SVAA system will need to be able to associate relevant data items with the LLFC Ids that DNOs will utilise with the new Measurement Classes.

Each DNO may allocate a pseudo SSC for each of the relevant LLFCs. These will not be published in MDD. Each pseudo SSC will be allocated a TPR. These TPRs will be published

in MDD. If no SSC and hence associated TPRs are allocated to the LLFC then these data items will be null in the VMR group.

Irrespective of whether a pseudo SSC has been allocated then the Data Item;

- 'SPM Total All EACs' will contain the aggregate estimated kWh for the LLFC and TPR combination;
- 'SPM Total Annualised Advance Report Value' will contain the aggregate actual kWh for the LLFC and TPR combination;
- 'SPM Total EAC MSID Count' will contain the count of number of MPAN for which the HH data associated with the LLFC has been estimated; and
- 'SPM Total AA MSID Count' will contain the count of the number of MPANs for which the HH data associated with the LLFC is actual data.

If a pseudo SSC has been allocated then the Data Item then SPM Default EAC MSID Count will be zero and the SPX group will contain the aggregate HH data (actual & estimated) associated with the LLFC – TPR combination.

If a pseudo SSC has not been allocated then SPM Default EAC MSID Count will be null and the SPX group will contain the aggregate HH data (actual & estimated) associated with the LLFC.

Group Conclusions:

DNOs will need to inform the SVAA what Standard Settlement Configuration (SSC) to report so that the correct data can be associated with each Line Loss Factor Class (LLFC). The SVAA will need to aggregate the data accordingly when they produce the report.

Requirement 4 – Changes to the SVAA System

The group concluded that throughout their discussions on the previous requirements that they had identified the necessary changes that would need to take place.

Group Conclusions:

Changes will be required to the SVAA system on how they produce their reports. They will need to be capable of receiving the lookup table from Requirement 3.

Requirement 5 – LDSOs not to issue site-specific invoices for MPANs in the new Measurement Classes

To avoid double charging, there is a need for DNOs not to issue site-specific invoices for MPANs in the new Measurement Classes. Therefore each DNO must ensure that receipt of D0036/D0275 data for an MPAN in one of the new Measurement Classes will not trigger an invoice for site-specific HH charges. Suppliers would presumably wish to validate that they don't receive site-specific invoices for these MPANs.

Group Conclusions:

The group concluded that this is a DNO issue and that they will need to ensure they do not issue Site Specific bills for the new Measurement Classes.

Potential Requirement

The Workgroup highlighted that the above approach is likely to be expensive and error-prone (expensive because it may need significant changes to DNO HH billing systems; error-prone because it relies on the DNO billing system having the same view of Measurement Class data as the Supplier and any differences will lead to disputed invoices).

Therefore the group is seeking further information from industry within the main consultation document. However, below is the discussion that has taken place.

Requirement 6 – Amending the HHDC-LDSO data flow

To avoid double charging the HHFC-DNO data flow would be amended to indicate which data relates to the new Measurement Classes (and is therefore outside the scope of site-specific billing).

The group originally considered three different approaches to this.

Option 1

Introduce the Measurement Class data item onto the D0036/D0275. This option seems unattractive, because it would require all HHDCs (including those not using the new Measurement Classes) to change, which is inconsistent with the Group's discussion of the HHDA-SVAA interface.

Option 2

The same as option 1, but we would give new flow numbers to the revised flows, allowing HHDCs who aren't using the new Measurement Classes to continue using the old D0036/D0275 flows. DNOs would be entitled to assume that MPANs on the old D0036/D0275 flows do require site-specific invoices.

Again there was concern surrounding this as this creates additional work for HHDCs and DNOs, and DNOs still need to validate that the correct data flow has been received.

Option 3

A variant on option 2, in which the new flows have exactly the same file format as the D0036/D0275 (i.e. don't have Measurement Class added in to them), and are only used for the new Measurement Classes. The D0036/D0275 will continue to be used for existing site-specific Measurement Classes.

In other words, it's the flow number (not the data in the file) that indicates whether the data relates to old site-specific Measurement Classes or new Measurement Classes. This is potentially easier for HHDCs and DNOs to implement (because the new flow is in the D0036/D0275 format they already know, with only the flow number changed), and because the new flows wouldn't be used for billing at all, it should reduce the risk of the wrong MPANs being billed.

The concern for this option is based on the fact that it is still necessary to validate that the correct data flow has been received against the MPAN thereby ensuring the correct billing is undertaken so DNOs may as well deal with it themselves if this reduces industry costs.

They already have a relationship between the LLFC and the MPAN so should be able to use this (as they do now) to determine whether to bill on a site-specific basis or not.

This is similar to what happened previously in the NHH market where some MPANs (PC1-4) were invoiced in aggregate by Settlement Class and the rest (PC5-8) were invoiced on a site specific basis. The DNO undertook the responsibility to bill in the correct manner. The DNO did not receive different D0010 data flows.

The group also discussed the use of such data for validation purposes. An alternative approach to receipt of the HH daily data is to make receipt optional and potentially receive aggregated monthly data in the form of a D0010.

5 Timetable and Responsibilities

Timetable

Assessment activity	Date
Present IWA to Panel	08/12/11
P280 Modification Group meeting 1	12/01/12
BSC Agent/ELEXON Impact Assessment / Consultation	10/02/12
P280 Modification Group meeting 2	W/C 12 March
Panel considers Assessment Report	12/04/12

Modification Group's membership and attendance

Member	Organisation	12/01/12
John Lawton (Proposer)	Electricity North West Limited	✓
Collette Baldwin	Eon Energy	✓
Walter Hood	IBM	✓
Julie Woulds	IMServ	✓
Ian Goudge	SSE	✓
Peter Waymont	UK Power Networks	✓
Eric Graham	TMA Data Management	✓
Martin Damti	Northern Powergrid	✓
Phillip Russell	Independent	✓
Stacey Deakin	GTC	✓
Jane Griffiths	Central Networks	✓
Jonathan Amos	Ofgem	✓
Kevin Woollard	British Gas	X