

## Stage 03: Assessment Procedure Consultation Responses

### P299 'Allow National Grid access to Metering System Metered Consumption data to support DSBR service'

This Assessment Procedure Consultation was issued on 28 February 2014, with responses invited by 14 March 2014.

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

## Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ	0/1	HHDC
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA
Salient Systems Limited	0/1	Other – provider of Industry Systems Software Solutions to Industry qualified agents – PAMS HHDC, HHDA, HHMO, NHHDC, NHHMO solutions
IBM UK Ltd for and on behalf of the ScottishPower Group	7/0	Supplier/Generator/Trader/Consolidator/Exemptable/Distributor
SmartestEnergy Limited	1/0	Supplier
E.ON	1/0	Supplier, HHDC
EDF Energy	10/0	Generator/Supplier/Party Agent/Consolidator/Exemptable/Generator/Trader
Stark Software International	0/1	HHDC
British Gas	1/0	Supplier

P299  
Assessment Consultation  
Responses

14 March 2014

Version 1.0

Page 1 of 29

© ELEXON Limited 2014

Question 1: Do you agree with the proposed format and content of the data submitted by HHDCs to the Transmission Company under P299?

## Summary

Yes	No	Neutral/No Comment	Other
4	4	0	1

## Responses

Respondent	Response	Rationale
IMServ	Yes	None provided.
TMA Data Management Ltd	No	<p>The proposed format of pipe delimited files sent by email is acceptable. However the restriction to only send periods from 4 pm to 8 pm unnecessarily complicates the change for HHDC's. The periods required are not clearly defined in the proposed text for the BSCP502 update; the wording suggests that the Transmission Company can request any subset of periods, which would further complicate the changes necessary to HHDC systems to support P299.</p> <p>It would be a very straightforward change to provide the data in the D0036 format i.e. with 48 periods per settlement date. It might be in the interest of the Transmission Company to have visibility of all the periods. It would also ensure that, if other peak times need to be included in the Demand Side Balancing Reserve, the data is already provided.</p> <p>Given that P299 is only a temporary solution, the most cost effective solution must be implemented. One system under development (DSBR) would be impacted to load 48 periods instead of many HHDC systems to remove 38 periods.</p>
Salient Systems Limited	No	<p>Data Interface Format Issues :</p> <p>The formatting and structuring of required data to be communicated between HHDC's &lt;&gt; Transmission Company using the familiar DTC adopted approach is fully supported. However, the record group structures that will be required, although possibly similar to particular existing DTC flow structures, should carry their own unique group identifiers that do not collide with existing DTC group identifiers - in order to differentiate such data from similar data in very different flows. Despite the assumption that DSBR will be called</p>

infrequently ( remains to be seen ) there would appear to be no good reason why the new flows required here should not be formally delivered through the normal Mrasco route. Irrespective of the potential for DSBR itself to persist into future Capacity Market mechanisms it is very likely that very similar data interface request<>return flows between HHDC's and Transmission Company or any future Demand Response Administrator role will persist - so why not start to formally position DR related flows at Industry level now.

Data contained within DSBR related flows should also be complemented by familiar flow header and trailer record data, again providing similar value to header and trailer information contained at all other industry agreed flows, and to include unique flow type identifiers. Many proactive HHDC's will want to automate their procedures to support DSBR related requirements economically as far as possible – in order to minimise staff resource overheads generally and to minimise the risk of poor response to unplanned, unpredictable DSBR events arising. Flow routing middleware solutions will typically be in place at HHDC's that will automatically route receipted flows ( using routing configuration data mapped to flow header data ) to the application architecture components that will automatically respond. Responses here will include the automatic and non-complex generation and distribution of DSBR required outbound flow data extracted from the portfolio data under their custodianship. Adopting familiar and industry de-facto approaches to data flow communications between participants here will reduce the requirement upon HHDC's to adopt exceptional procedures to manage particular interfaces where steady state procedures will already accommodate requirements. HHDC's already committed to delivering added-value complements to their services in order to effectively address future DR related service requirements ( Capacity Market ) will gain further value in the future from automated facilities that they position now to address DSBR requirements.

Commitment to formal flows and flow header and trailer data would similarly improve opportunity at Transmission Company to economically automate receipt, validation, anomaly identification and follow up processes that will be required.

	<p>Observations above, if supported, would also raise the more attractive potential to consider Electralink DTN services as the primary means for communicating DSBR related flow data, with email communications providing alternate and/or complementary mechanisms only.</p> <p>Interface Data Content Issues:</p> <p>An early view of the data contents and format of request flows from Transmission Company to HHDC is required, in order to support HHDC proactive action.</p> <p>Requirements attached to initial requests for consumption history and subsequent requests for DSBR event consumptions and further nominated 10 day historical consumption data are clear. However, proactive HHDC's who will be positioned to provide additional services to their own contracted DSBR I&amp;C clients or to third party DR aggregators ( including Supplier clients ) would benefit from an automated and periodic update from Transmission Company of the 10 peak days arising, as they arise, during the DSBR target period. This approach will remove the requirement upon DC's to monitor Transmission Company web based alerts that peak day dates have changed. Automated data delivery here will support HHDC data analysis service deliveries to their own clients - to assure that clients are continually made aware of shifting gross DR consumption targets that will meet their nominated net commitments to DSBR.</p> <p>The HHDC will benefit from further working practice detail that will describe the policy to be applied by HHDC's when responding to Transmission Company requests for historical Mpan consumption data. Further, the Transmission Company should be encouraged, at this point, to identify any further data that may be available at HHDC's that may be of value to the Transmission Company to support the integrity of processes at their side.</p> <p>The above is illustrated briefly by means of the observations below :</p> <p>An HHDC that has been appointed to a DSBR Mpan continuously since before the start settlement date for which DSBR enabling history is required can provide all historic data, and he was</p>
--	---

responsible throughout for generating that data. If the HHDC is the currently appointed HHDC but the appointment is not continuous back to DSBR history start date then he should also still have the relevant consumption history at his portfolio delivered and generated from previous HHDC(s). If the HHDC is not currently appointed to a DSBR Mpan but he was appointed at any settlement dates over DSBR history request period then he will also have that history data available at his portfolio, and he continues to be responsible to the Supplier for it. Further clarity, then, will be required to specify the responses expected from each HHDC that has a view of the candidate historical data. It would be expected that further value to Transmission Company data validation, analysis and follow up anomaly resolution objectives would be achieved through delivery by HHDC's of all data available at the HHDC along with further classification data describing its context.

Where import Mpans have been established recently and do not have the requisite historical consumption profiles required to participate at DSBR then policy must describe how HHDC's should respond.

Similarly, where import Mpans have been established recently, perhaps in response to client decisions to generate locally and contribute to DSBR, similar policy to describe how HHDC's should respond is required. Discouraging participants to take proactive steps to contribute to DSBR through new local generation capability must surely send the wrong signals entirely. The potential for HHDC's to send zero consumption histories where appropriate is an option for consideration.

The HHDC has a range of additional MTD configuration data available that may be of value to Transmission Company. For example, is a particular Mpan a member of an export/import pair of Mpans that should be tagged together at any DSBR unit configuration nominated to the Transmission Company ?

Bottom line is, where there is potential value at data residing at HHDC portfolios, to be employed productively now or possibly later, then specify it early rather than later.

IBM UK Ltd for and on behalf of the ScottishPower Group	No	<p>We agree that using the current D0036 format is the best way forward, ensuring that data is passed to National Grid in a common format. However we also think that a more efficient process would be to send the entire days data in the file. The main manual activity for us in this process is the editing of the numerous D0036 files to remove the unwanted periods (40 periods x 77 days (winter period) x &lt;unknown number of MPANs). We believe that a simpler process would be to have National Grid strip out these unwanted periods as they load them into their own systems. This would reduce the effort (and additional cost) to virtually nil.</p>
SmartestEnergy Limited	Unsure	<p>D36 data (i.e. at meter) is most appropriate if ungrossed up data is the basis of payments, but there are issues with the process for sending updates.</p> <p>Other EMR arrangements will be at NBP and have concluded that creating an additional BMU is appropriate.</p>
E.ON	No	<p>The provision of data should be made as efficient as possible for HH DC's. DC's will not be able to plan for when the service is called upon and therefore on receipt of a request for data they may have to prioritise over BAU processes. If so there would be an associated impact on suppliers whose work is impacted by the re-prioritisation.</p> <p>It is not efficient to get numerous HH DC's to write scripts and manually run reports to pull the relevant data individually. We would prefer for the HH DC to supply NGTC with the existing D0036 flow. NGTC can then pull the relevant data only requiring the writing of 1 new report and the manual intervention of 1 party rather than many.</p> <p>Whilst we understand that it may seem less efficient to NGTC, we believe that this would be the most efficient and cost effective means of meeting the requirements for the market in general.</p>
EDF Energy	Yes	<p>On balance, yes. The proposal states that the data submitted by the HHDC should be submitted to the Transmission Company in a <b>similar</b> format to the data that is currently required in the DTC flow D0036. However, if it is not in the <b>same</b> format, then additional work might be necessary which may incur additional costs.</p>

Stark Software International	Yes	But would think that keeping the flow at 48 TPs rather than reducing to 8 would minimise changes.
British Gas	Yes	None provided.

## Question 2: Will P299 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	Acting within our role as HHDC, we will be expected to issue consumption data to Grid. Please refer to the response to Question 4 for further information on how we will be impacted.
TMA Data Management Ltd	Yes	Our systems and procedures are impacted.
Salient Systems Limited	Yes	<p>We are providing automated solutions that will be loosely coupled complements to our own, and other, HHDC products in place at HHDC agents.</p> <p>Our solution will provide DSBK aggregator administration facilities and all data interface facilities that are required between all parties, including HHDC&lt;&gt;Transmission Company.</p> <p>So our own interest is in receiving early and clear further detailed guidance/specifications of requirements from Transmission Company and Elexon in order to deliver to our clients in appropriate timescales.</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	The proposed solution will mean that we will have to put in place a very manually intensive process to generate the required flows and then edit them down to the required 4 hours' worth of readings, and ensure that they are sent off to National Grid.
SmartestEnergy Limited	Yes	SmartestEnergy will be impacted if we are presented with bills from the Data Collector to provide data to NGT. However, the proposal is inadequately detailed on this matter.
E.ON	Yes	As HH DC we will have to provide the data on request and if the process is burdensome, we also envisage an impact as supplier, as resource will be diverted from BAU processes in order to fulfil the requests.
EDF Energy	Yes	Yes. If any of our customers tender for DSBK, then we will be impacted.

Respondent	Response	Rationale
		<p>Given that it is not the intention of the Transmission Company to pay for the service, as the BSC Party who has the contract with the HHDC, we may end up having to pay for the proposed service. There may also be an operational impact (e.g. lower performance on existing services) as a consequence of the HHDC providing a service to a third party.</p> <p>The workgroup seems to think addressing the above is not within the scope of the proposal. We disagree. We believe it needs to be addressed because suppliers cannot otherwise assess the materiality of this proposal. The workgroup may also wish to consider whether other cost recovery options might be possible.</p> <p>Although the proposal does not require suppliers to verify whether the relevant MSIDs are registered to them, we suspect this process might be useful for validation and so that suppliers know that their customers are involved. If this proves to be the case, then there may be a need to allocate new resources which could lead to further costs.</p> <p>Under the BSC, the supplier is responsible for the meter data. So we would assume some mechanism must be put in place for the DSBR registration system to record the relevant supplier for each meter. The registration system may also need to be able to keep track of 'change of supply' post registration. While we note that this is not part of the proposal, we think these issues need to be considered holistically so that suppliers can gain a clearer understanding of their role and responsibilities when the DSBR is implemented.</p> <p>As a supplier we want to know what additional costs we might incur and what cost are covered by the funding arrangements as outlined in Ofgem's consultation <a href="https://www.ofgem.gov.uk/ofgem-publications/85276/informalconsultationonfundingarrangementsfornewbalancingservices.pdf">https://www.ofgem.gov.uk/ofgem-publications/85276/informalconsultationonfundingarrangementsfornewbalancingservices.pdf</a></p>
Stark Software International	Yes	Additional development and ongoing operational work required if accepted
British Gas	Yes	Potential Cost to Supplier from HHDC and Resource of our contracted HHDC to liaise with Grid.

Question 3: Under the P299 solution the HHDC cost of providing the DSR data to National Grid will be picked up by the Supplier. Do you agree with this approach?

## Summary

Yes	No	Neutral/No Comment	Other
0	6	3	0

## Responses

Respondent	Response	Rationale
IMServ	No	<p>See also response to Question 7 as this partly explains our answer.</p> <p>As HHDCs are being asked to provide a new service which sits outside the SVA arrangements, all costs incurred (from development through to ongoing processing) in the provision of the service will need to be charged onto another party.</p> <p>Should the charge be made on Suppliers, there would be some practical difficulties for all HHDCs in terms of applying them:</p> <p>During the tendering stage, Grid would request data from HHDCs for End Users wishing to enter the scheme.</p> <p>The HHDC would then seek to charge the Supplier, where the Supplier has no view on which of their customers is involved, so would find it difficult to ensure the charge (based on volume was accurate).</p> <p>Would the Supplier absorb this cost or pass it on and if so, how (since they would not know which MPANs had triggered the charge)?</p> <p>What happens should the customer change Supplier partway through the process?</p> <p>Again, should the service be called, HHDCs would supply data to Grid based on a list from Grid, and would then seek to levy charges on the Supplier. Would the Supplier be able to validate such charges, i.e. would they know which customers had been called by Grid under DSR.</p> <p>This does suggest that Grid would need to share information with Suppliers as to which MPANs are involved in both the tendering and DSR events.</p> <p>Consideration could therefore be given to the charge being levied by HHDCs on Grid, instead of Suppliers, as, Grid are the recipient of the service.</p>

Respondent	Response	Rationale
TMA Data Management Ltd	No response	In an effort to limit the cost to Suppliers and ultimately to consumers, the use of the full D0036 format must be adopted.
Salient Systems Limited	No	<p>It seems perverse that the setup and steady state administration costs that will be born by HHDC's will be treated differently from either DSB's participant set up and delivery costs or Transmission Company administration costs – issues addressed by Ofgem recently ! The HHDC will not necessarily be providing service to the Supplier but will be providing service to the Transmission Company and indirectly to the DSB's mechanism.</p> <p>HHDC setup costs and transactional costs should be agreed and be recovered by HHDC from Transmission Company who will recover from admin costs. Any costs at Electralink DTN ( if adopted ) to address possible DSB's related flow transmissions should similarly fall directly to Transmission Company.</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	No Response	None provided.
SmartestEnergy Limited	No	We believe that NGT should pay DCs direct for the provision of data as the proposal is outside of normal BSC business.
E.ON	No	We would only support this approach if the solution was lowest impact on the market, which we believe is for HH DC's to provide the D0036 flow to NGTC. It is not reasonable to ask suppliers to pick up costs for inefficient process, especially when they will also suffer an impact on the service provided to them at times when the service is called upon.
EDF Energy	No	The expected cost of providing DSB's data is not stated in the consultation and until we have a clearer view, we cannot agree with the approach. If the cost is negligible, then the proposed approach may be acceptable provided that DSB's remains an interim balancing tool for National Grid.

Respondent	Response	Rationale
Stark Software International	No	No. This involves too many parties and would never be agreed fairly. Existing contracts are in place with most Suppliers but this work falls outside existing clauses and would require extensive negotiation. Far simpler if costs are picked up centrally.
British Gas	No Response	Depends on the cost – to date we have not been able to ascertain the cost of providing this information. There may be practical difficulties in that suppliers will have no view as to which customers are in DBSR events and therefore will not be able to validate invoices.

## Question 4: Will your organisation incur any costs in implementing P299?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

### Responses

Respondent	Response	Rationale
IMServ	Yes	Costs will be incurred in the following areas: Development of reports Training and updating working procedures Administration of the service DTN costs Supporting the auditing of the service
TMA Data Management Ltd	Yes	If the full D0036 format is used, the cost of P299 to our organisation would be minimal, however, if only a subset of the day's data is sent, the financial impact is much higher.
Salient Systems Limited	Yes	Development costs, passed onto client HHDC's, circa 5k per HHDC
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	Accommodating the proposed manual process will incur an estimated cost of approx. £150 per request.
SmartestEnergy Limited	Yes	The costs of implementation are unknown. The imbalance a supplier may find himself in is a risk. It is not enough to assume that the supplier will be long and will receive a market based SSP.
E.ON	Yes	Even if HH DC's supply the D0036 flow, which is our preferred option, there would still be work involved in identifying only the relevant MSID's. This would be kept to a minimum if using the D0036 flow. There would also be manual effort in running the report on request and resolving any queries. If the proposed solution were implemented, these costs would be significantly more, as the report would be more complex and therefore the manual effort to build, run and resolve queries would also be greater.
EDF Energy	Yes	Potentially yes. See comments above.

Respondent	Response	Rationale
Stark Software International	Yes	Significant development work Implementation Procedures Training Annual tender work Frequent but unscheduled duties associated with calling and associated follow up Billing
British Gas	Yes	Under question three, depending on the contract to provide this data from the HHDC, then yes Suppliers will incur a cost?! But this is still unclear!

## Question 5: Do you agree with the Workgroup's proposed implementation approach?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	1	1

### Responses

Respondent	Response	Rationale
IMServ	No	Whilst appreciative of the timescales the Transmission Company is working towards regarding implementation of this new service, we believe that attempting to meet these timescales has already negatively influenced the consultation process and we have concerns that subsequent decisions may also be similarly affected.
TMA Data Management Ltd	Maybe	Providing the need for data in order to implement the DSBR in 2014-2015 and the tendering process, the 26 June 2014 if the Authority's decision is received before the 12 of June 2014 and 10 WD if the Authority's decision is received after the 12 <sup>th</sup> of June is good. However, we would not be able to implement the required changes in 10 WD if the subset of periods in the D0036 is maintained.
Salient Systems Limited	Yes	None provided.
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	None provided.
SmartestEnergy Limited	No	None provided.
E.ON	Yes	The timelines would be tighter if HH DC's have to create new reports to support the proposed solution. If the D0036 can be sent then the timeline will be easily achievable.
EDF Energy	Yes/No	We do not know because the main impact will be on HHDCs and we have not been able to gain a clear view regarding cost or timescales from them.
Stark Software International	Yes	None provided.

Respondent	Response	Rationale
British Gas	Yes	According to agents it appears they believe that this can be achieved, although the number of subsequent queries to the HHDC will depend on the amount of MPANs that the transmission company ask for.

## Question 6: How long (from the point of Ofgem approval) would you need to implement P299?

### Responses

Respondent	Comments
IMServ	<p>There are two distinct areas of work which need to be considered and time required for each differs significantly.</p> <p>1) Technical development and implementation of proposed solution: 4 – 8 weeks</p> <p>2) Agreement of supporting commercial arrangements:</p> <p>If suppliers are to be charged for this service, contractual arrangements will need to be agreed with all HH Suppliers in the Market before any work commences. As we are not able to fully control the timescales for this activity (and recognising that suppliers will likely be dealing with other such requests from all other DCs) we anticipate that this may take &gt; 12 months and a successful outcome is not guaranteed in all instances</p>
TMA Data Management Ltd	It depends on the final format of the data. For the D0036 full format, we would only require between 8 and 10 WD for procedure update. If the D0036 subset format is used, as proposed by P299, we would require 40 WD.
Salient Systems Limited	For us, key issue is date for delivery of final detailed specifications from Transmission Company and Elexon, rather than Authority authorisation date. We would require 2 months notice prior to implementation date to finally confirm our system specifications, test and implement at client sites.
IBM UK Ltd for and on behalf of the ScottishPower Group	There are no system changes to implement, so a few days to ensure procedures are updated.
SmartestEnergy Limited	We do not know which customers will be interested in this and so we do not know how many contracts will be affected

Respondent	Comments
E.ON	Again, if the solution was to provide the D0036 flow, we would need relatively little time to implement. We believe that this could be achieved in 1 month. If the requirement was for a new format the time would be longer as the report would be more complex. We believe that with the proposed solution we would need 3 months to build, test and implement the solution.
EDF Energy	We may need to renegotiate our contract with our HHDC. If this is the case we would need much more than 10 WDs.
Stark Software International	Subject to centralised payment 6-8 weeks.
British Gas	Question for HHDC

Question 7: Do you agree that the Proposed Legal Text and BSCP502 redlining delivers the intent of the P299 solution? Do you agree BSCP502 is the most appropriate location for the detailed process steps?

## Summary

Yes	No	Neutral/No Comment	Other
2	2	5	0

## Responses

Respondent	Response	Comments
IMServ	No	<p>This is the second non SVA process affecting agents currently under discussion, with the potential that more will follow. It is therefore essential, and opportune, that the wider point of suitability of location for the requirements is discussed and agreed. It should not be assumed that because a document offers a convenient location, that it is appropriate for the proposed use; the implementation of a bespoke BSCP to capture all such requirements should therefore also be considered.</p> <p>The Purpose of BSCP502 is defined as: This BSC Procedure defines the processes that the Half Hourly Data Collector (HHDC) shall use to carry out the work for data collection (including data retrieval, estimation and data processing) for SVA Metering Systems with half hourly (HH) Metering Equipment (referred to in the rest of this document as "HH SVA Metering Systems") operating within the Supplier Volume Allocation (SVA) arrangements.</p> <p>Supplier Volume Allocation is defined as: the determination of quantities of Active Energy to be taken into account for the purposes of Settlement in respect of Supplier BM Units;</p> <p>Settlement is defined as: the determination and settlement of amounts payable in respect of Trading Charges (including Reconciliation Charges) in accordance with the Code (including where the context admits Volume Allocation);</p> <p>Data Collectors are defined as:</p>

Respondent	Response	Comments
		<p>2.3.1 The principal functions of a Half Hourly Data Collector are, in accordance with the provisions of this Section S and the Supplier Volume Allocation Rules, with BSCP502 and BSCP520 and with Party Service Line 100.</p> <p>Section S is defined as:  (a) the rights and obligations of Suppliers, and the activities and functions for which Suppliers (and their Party Agents) are responsible, in relation to Supplier Volume Allocation;</p> <p>Therefore, it would seem that this activity, although it would be convenient to place it in BSCP502, sits outside this document, since BSCP502 is solely concerned with Supplier Volume Allocation which this new activity plays no part in.</p> <p>Consideration also needs to be given (and agreement reached) regarding the implications of locating these arrangements within BSCP502. This would indicate that Suppliers are responsible for the compliance of their agents under the Supplier Hub principle. Would this new service therefore fall under the scope of the PAF.</p> <p>In the event that the use of BSCP502 is agreed, our comments on the redlining are as follows:  Section 3.4.4.3 of the proposed BSCP502 states:</p> <p>'Collate and send...for each MSID...'</p> <p>No contingency is allowed for should the HHDC be unable to perform this action – this needs to be catered for.</p> <p>Same also applies to 3.4.4.9</p>

Respondent	Response	Comments
TMA Data Management Ltd	No	<p>We agree that BSCP502 is the most appropriate location for the details process steps, however we would like to see the following changes to the BSCP502 relining:</p> <p>3.4.4.1 change the Information Required from "MSIDs, Settlement Dates and Settlement Periods for which HH Metered Data is required" to "MSIDs, Settlement Dates and <del>Settlement Periods</del> for which HH Metered Data is required. Change the Action from "Send initial request for historic HH Metered Data" to Send initial request for historic <u>validated</u> HH Metered Data"</p> <p>3.4.4.3 change the Action from 'Collate and send historic HH Metered Data for each MSID included in the request (only need to send data for the MSIDs there is data held for)" to "Collate and send historic <u>validated</u> HH Metered Data for each MSID included in the request (only need to send data for the MSIDs there is data held for)"</p> <p>3.4.4.7 change the Action from "Send request for HH Metered Data" to "Send request for HH <u>validated</u> Metered Data". Add an entry in Information required "MSIDs, Settlement Dates for which HH Metered Data is required"</p> <p>3.4.4.9 change the Action from 'Collate and send HH Metered Data for each MSID included in the request" to 'Collate and send <u>validated</u> HH Metered Data for each MSID included in the request"</p>
Salient Systems Limited	No Response	None provided
IBM UK Ltd for and on behalf of the ScottishPower Group	No Response	None provided.
SmartestEnergy Limited	No comment	None provided.

Respondent	Response	Comments
E.ON	Yes	We believe that BSP502 is the appropriate place for the process steps. However, the red lining in section 3.4.4.3 states 'Collate and send historic HH Metered Data for each MSID included in the request (only need to send data for the MSID's there is data held for)'. We believe this would result in the same data being submitted multiple times, once by the current HH DC for the site, and potentially the previous HH DC where there has been a change of agent or supplier during the period between the request and the period for which the data relates to. The requirement to send data should be on the current appointed agent only.
EDF Energy	Yes/No	It appears to deliver the intent of the P299 solution but we are not completely persuaded that P299 is the best solution to deliver meter data in support of DSB. R.
Stark Software International	Yes/No	Unsure
British Gas	Yes	None Provided

**Question 8: Do you agree with the Workgroup's view that there are no feasible alternative solutions to P299?**

**Summary**

Yes	No	Neutral/No Comment	Other
2	6	1	0

**Responses**

Respondent	Response	Comments
IMServ	Yes	None provided.
TMA Data Management Ltd	No	The alternative is not in the way the Transmission Company receives the data but rather the detail of the data received (all periods instead of a subset of the settlement day's periods).
Salient Systems Limited	Yes	In the event of significant objections or issues at HHDC's then Distributors best positioned to provide required data, but likely less able to respond. HHDC's are the correct target.
IBM UK Ltd for and on behalf of the ScottishPower Group	No	<p>We believe that a simpler and more cost efficient solution would be to provide full day D0036 files for the requested MPANs / settlement dates to National Grid. These files can be generated in line with current processes with little or no impact on operational efficiency. National Grid can then import only those periods that they are interested in.</p> <p>This alternative solution could be implemented with a bare minimum of notice and at a fraction of the cost of the proposed. As a consequence, the detriment on Objective c is greatly reduced, making it virtually neutral.</p>
SmartestEnergy Limited	No	<p>Additional BM Units are a convenient way of isolating MPAN data in a controlled manner. It doesn't really matter whether the data is grossed up or not since the price can be adjusted.</p> <p>It appears that the proposal has been put forward without comparing costs with alternatives, or even specifying exactly what the responsibilities of the supplier and DC are.</p>

Respondent	Response	Comments
E.ON	No	No, we believe that the provision of the D0036 could be an alternative and more efficient solution. It would require little work on behalf of HH DC's and there is the option of sending the flow via the DTN or extracting the flow data to send via an alternative method, as long as the format is retained it will be simple for NGTC to extract the data that they require.
EDF Energy	No	We think there is a need to understand the costs of delivering the solution and whether there are alternative ways of recovering the costs.
Stark Software International	Yes/No	Unsure
British Gas	No	Further thought would suggest that this data could also be obtained from the DNO directly at no cost to the supplier.

Question 9: Do you agree with the Workgroup's initial unanimous view that P299 does better facilitate the Applicable BSC Objectives than the current baseline?

## Summary

Yes	No	Neutral/No Comment	Other
6	1	2	0

## Responses

Respondent	Response	Comments
IMServ	Yes	None provided.
TMA Data Management Ltd	Yes	None provided.
Salient Systems Limited	Yes	None provided.
IBM UK Ltd for and on behalf of the ScottishPower Group	Yes	<p>Objective b) This Modification will allow National Grid to implement their DSBR service in a timely and effective way.</p> <p>Objective c) This Modification will have a detrimental effect on competition. Under the current proposal, National Grid will not pay for the additional HHDC costs incurred as a result of supporting the DSBR service. These costs will therefore be passed onto HH Suppliers (and in turn consumers). NHH-only Suppliers will not be faced with this additional cost. By National Grid's own admission, there is an expectation that this service will only be used as a last resort. The number of customers called will be small (or non-existent), meaning that the number of Suppliers benefitting from an increased long position will consequentially be tiny.</p> <p>Objective d) There is a small detriment to Objective d, as always occurs when changes are made to the BSC arrangements that don't derive any efficiency benefits in the way ELEXON administer those arrangements.</p> <p>Overall the benefits on b outweigh those detriments on c and d.</p>

Respondent	Response	Comments
SmartestEnergy Limited	No	This is not strictly speaking a BSC issue but it does seem to facilitate the efficient, economic and co-ordinated operation of the National Electricity Transmission System
E.ON	Yes	We agree with the working groups view, but again believe that if the DSBR service were to be maintained longer than intended the minor impacts noted may become more significant.
EDF Energy	Yes/No	We agree it is needed but feel the overall proposal is still light on details.
Stark Software International	Yes/No	None provided.
British Gas	Yes	None provided.

## Question 10: Do you have any further comments on P299?

### Summary

Yes	No
6	3

### Responses

Respondent	Response	Comments
IMServ	Yes	<p>We recognise that National Grid's requirements, as described in this Modification, are essential to support the new Demand Side Balancing Reserve Service: non-compliance by an agent will jeopardise this service and ultimately disadvantage end user participants.</p> <p>The proposed solution has not considered this element (although potentially makes assumptions) and focus needs to be given to how compliance will be ensured in practice.</p>
TMA Data Management Ltd	Yes	<p>The D0036 flow name is "Validated Half Hourly Advances for inclusion in Aggregated Supplier Matrix". We strongly advise that the proposed wording for the BSCP502 clearly states that the data requested and sent is validated to ensure that the data provided to the Transmission Company is validated to BSC standards.</p>
Salient Systems Limited	Yes	<p>Although timescales are demanding, P299 must be implemented as comprehensively as possible now in order to reinforce confidence and enthusiasm in the market for developing DR initiatives at the future Capacity Market.</p>
IBM UK Ltd for and on behalf of the ScottishPower Group	No	<p>None provided.</p>

Respondent	Response	Comments
SmartestEnergy Limited	Yes	<p>The document states that the intention is to provide “ad hoc” reports and this may be appropriate for validating tender information. But it seems to us that for settlement of the service provided, more regular and automated data flows may be more appropriate. This may lead to the conclusion that a more stable automated solution is required.</p> <p>The document also states that data for certain days/hours is required as a minimum but no consideration appears to have been given in the document/working group discussions to the dilemma of whether it is appropriate for more data to be provided (probably causing less development on the DC side, but more analysis on NGT’s side)</p> <p>There appears to have been no consideration of how NGT will identify which DC to approach for each MSID unless there is involvement from the supplier.</p> <p>The document states the following: “The Proposer advised that the Transmission Company, in tendering for the DSBR service, will have developed a relationship with DSBR providers and may know who the relevant Supplier is (and if or when it changes).” This is not definite enough in our opinion. A proper process of identification and communication is required.</p>
E.ON	Yes	<p>We appreciate that provisions are in place in regards to the secure storage and correct usage of the data. However, we would have to assume that the relevant protections under DPA had been afforded the customer in their contract with NGTC. We agree that there could be an impact on suppliers left long at gate closure, while we do not foresee this to be material in the current market this could change if pricing signals became sharper. We believe that in the event this service is in place longer than intended a review of the impacts should be carried out.</p>

Respondent	Response	Comments
EDF Energy	Yes	<ol style="list-style-type: none"> <li>1. Could HHDAAs do the proposed functions instead using some standard software solution? We wonder whether this might be an easier solution.</li> <li>2. How would the list of MSIDs get to the HHDCs and what are the opportunities for suppliers to verify their responsibility for customers and agents?</li> <li>3. Each supplier should also obtain a copy of the information being sent to the Transmission Company in relation to its customers.</li> </ol>
Stark Software International	No	None provided.
British Gas	No	None provided.