

# Report Phase Consultation Responses

## P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes (DCP179)'

**ELEXON**

What stage is this document in the process?

**01** Initial Written Assessment

**02** Definition Procedure

**03** Assessment Procedure

**04** Report Phase

This Report Phase Consultation was issued on 18 August 2014, with responses invited by 5 September 2014.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish and Southern Energy Power Distribution	2/0	Licensed Distribution Systems Operator (LDSO)
BES Commercial Electricity LTD	1/0	Supplier
IMServ Europe	0/3	Half Hourly Data Collector (HHDC), HH Data Aggregator (DA) and HH Meter Operator Agent (MOA)
Electricity North West	1/0	LDSO
TMA Data Management Ltd	0/1	Supplier Agent
British Gas	1/0	Supplier
SmartestEnergy Limited	1/0	Supplier
Northern Powergrid	2/0	LDSO
Western Power Distribution	4/0	LDSO
ScottishPower	4/1	Supplier, LDSO and Supplier Agent
Haven Power Ltd	2/0	Supplier
SSE Energy Supply Ltd	2/0	Supplier
UK Power Networks	3/0	LDSO
RWE Npower	4/3	Supplier, Supplier Agents

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Question 1: Do you agree with the Panel's initial majority recommendation that P300 should be approved?

## Summary

Yes	No	Neutral/No Comment	Other
14			

## Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Yes	-
BES Commercial Electricity LTD	Yes	-
IMServ Europe	Yes	-
Electricity North West	Yes	As the Proposer we still believe that this change proposal better facilitates objectives c) and d) for the reasons explained in section 7 of the report phase consultation document.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
SmartestEnergy Limited	Yes	Whilst we do not believe that this modification improves the efficiency of the BSC we appreciate industry requires it to implement P272.
Northern Powergrid	Yes	We agree with the Proposer's assessment against objective c in that this change will facilitate the promotion of competition by aiding the smart meter roll out, as well as assisting the implementation of other changes such as DCP 179. We agree with the Workgroup's assessment against objective d.
Western Power Distribution	Yes	(d) Promoting 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.
ScottishPower	Yes	We believe that P300 better meets Applicable BSC Objective (d) in that the increased use of actual data from HH metering will improve settlement accuracy, therefore we agree with the Panel that P300 should be approved.

Respondent	Response	Rationale
Haven Power Ltd	Yes	Yes, whilst this will have a significant impact on supply businesses (which we have reflected in our previous comments regarding proposed implementation dates and cost projections) we understand this modification is necessary to realise the full benefit of DCP 179.
SSE Energy Supply Ltd	Yes	-
UK Power Networks	Yes	Having been involved in the working group we are in agreement that the approach recommended for P300 should be approved.
RWE Npower	Yes – with caveat	Npower agrees with the Panel's majority recommendation that P300 should be approved, when P300 is considered as an enabler to DCP179. If this modification were to be considered as a stand alone BSC modification then npower do not believe it better facilitates any of the BSC Objectives. This view is based on the fact that the P300 solution has been designed only to enable DCP179 and the solution which that CP implements. The need for changes to be made to the BSC is solely as a result of DCP179. There is no existing 'defect' within the BSC that this modification is needed to address. We are concerned that the BSC Panel has initially recommended approving a modification which as a stand alone modification does not better facilitate any of the BSC Objectives than the current baseline.

Question 2: Do you agree with the Panel that the redlined changes to the BSC and CSDs deliver the intention of P300?

## Summary

Yes	No	Neutral/No Comment	Other
12		2	

## Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Yes	-
BES Commercial Electricity LTD	Yes	-
IMServ Europe	Yes	-
Electricity North West	Yes	We are comfortable that they deliver the intention of P300.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
SmartestEnergy Limited	No comment	-
Northern Powergrid	Yes	-
Western Power Distribution	Yes	-
ScottishPower	Yes	-
Haven Power Ltd	Not reviewed	-
SSE Energy Supply Ltd	Yes	-
UK Power Networks	Yes	We are in agreement that the changes to both the BSC and CSDs deliver the intention of P300.

Respondent	Response	Rationale
RWE Npower	Yes – with amendment	<p>BSCP 502 - 3.4.2.9 – Footnote 30 'For Measurement Classes F and G, the HHDC should not send the D0036 or D0275 to the LDSO but instead send the D0010 in accordance with the timescales and processes in 3.4.1.12 above.'</p> <p>We have concerns that this does not work. With interval data it is possible to rescale the data as each half-hourly interval has no reliance on the period coming before or after it (it is not cumulative) and as long as the rescaled period isn't retrieved from the meter after rescaling has occurred there will be no issue. With a register reading there is no physical change to the reading in the meter so if a reading was scaled up or down for the purposes of a dataflow, the next time a reading was taken directly from the meter the advance would be incorrect compared with the previous scaled reading.</p>

### Question 3: Do you agree with the Panel's recommended Implementation Date?

#### Summary

Yes	No	Neutral/No Comment	Other
14			

#### Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	Yes	-
BES Commercial Electricity LTD	Yes	After some analysis on the cost implications of P272, the differences in DNO charges are fairly significant in their current state, and the financial impact on the business when applied to several hundred of our larger sites could be huge. BES Commercial Electricity LTD would prefer to wait until the DCUSA is updated with new tariffs for the affected supplies before we agree to the implementation date of April 2016 for P272 so that we can quantify the impact on us. We therefore would like to see P300 agreed and new tariffs implemented so that we can quantify the impact of P272.
IMServ Europe	Yes	-
Electricity North West	Yes	We believe that this is a sensible implementation date when considered in the round regarding the impact on DCP179 and P300. However the real impact is the interaction with P272 which mandates PC5-8 sites being settled on a Half-Hourly basis (subject to approval). This is elaborated on under question 4.
TMA Data Management Ltd	Yes	-
British Gas	Yes	-
SmartestEnergy Limited	Yes	The implementation date appears to fit in with the timescales of DCP179 and P272.
Northern Powergrid	Yes	Yes, we agree that a lead time of 12 months from authority decision is sufficient.
Western Power Distribution	Yes	Durabill -St Clements do not anticipate any problems meeting a Nov 2015 deadline.

Respondent	Response	Rationale
		<p>It is anticipated that 8-12 weeks lead time would be required to complete the functional developments.</p> <p>MPRS – SCS currently planning to release changes required for P300 as part of a scheduled release due 3rd Qtr. 2015.</p>
ScottishPower	Yes	<p>Given the multiple system changes, some complex, that will be required, it seems sensible to ensure that an appropriate amount of time is given to resource, manage, and test the P300 changes prior to the implementation of this change. In this case we believe the proposed minimum time of 12 months should be appropriate.</p>
Haven Power Ltd	Yes	<p>We understand that aligning the implementation date with a BSC systems release is desirable and that this change will not mandate the new measurement classes. We believe that a 12 month period is the bare minimum necessary to implement this particular change. However we still have concerns regarding the interaction of the implementation dates of P272, P300 and DCP179 for the reasons that we have outlined in our letter to the BSC panel dated the 15th of August. We have included a copy of this letter as part of our response to this consultation. We believe that HH settlement of P5-8 needs to be dealt with coherently under a single umbrella otherwise there is a real risk that customer outcomes will be damaged as set out in the attached letter.</p>
SSE Energy Supply Ltd	Yes	-
UK Power Networks	Yes	<p>We believe that it is important that P300 is implemented at the earliest opportunity and so agree with the proposed implementation date for P300.</p>
RWE Npower	Yes	<p>Taken in isolation, the recommended implementation date for P300 is acceptable. However, P300 cannot be considered a stand alone modification as it's an enabler for DCP179. It is our view that the implementation dates for DCP179, P300 and P272 should be considered collectively ensuring there is enough time in between each of the implementation dates for the necessary development and testing to take place. What must be considered when deciding on the implementations dates of these modifications are the impacts on the customer and supplier's ability to</p>

Respondent	Response	Rationale
		conduct processes without impacting settlements or the customer experience. Npower believes that reducing the timescales between implementation puts settlements and the customer experience at significant risk which undermines the perceived benefits of implementing these modifications all together.



## Question 4: What views do you have on the interactions and proposed implementation approaches between DCP179, P300 and P272?

### Responses

Respondent	Response
Scottish and Southern Energy Power Distribution	We have no comments at this time.
BES Commercial Electricity LTD	As above - After some analysis on the cost implications of P272, the differences in DNO charges are fairly significant in their current state, and the financial impact on the business when applied to several hundred of our larger sites could be huge. BES Commercial Electricity LTD would prefer to wait until the DCUSA is updated with new tariffs for the affected supplies before we agree to the implementation date of April 2016 for P272 so that we can quantify the impact on us. We therefore would like to see P300 agreed and new tariffs implemented so that we can quantify the impact of P272.
IMServ Europe	<p>As HHDC/DA, there is no requirement for implementing coincidental delivery of all three changes, we can operate the requirements of P300 independently.</p> <p>Irrespective of the implementation approach, we advocate this exercise is centrally co-ordinated and managed by ELEXON to include all affected parties.</p>
Electricity North West	<p>The proposed implementation dates are:</p> <p>DCP179 – 1 April 2015</p> <p>P300 – 5 November 2015 (if decision made by 5 November 2014)</p> <p>P272 – 1 April 2016 (current consultation proposal)</p> <p>When considering the above dates the proposed interaction between the three seems appropriate.</p> <p>However this really does depend on the Ofgem decision date associated with all three.</p> <p>With regards to DCP179, a decision in November is important to ensure that the distribution indicative charges can be produced in December 2014 for implementation in April 2015. Failure to do so may result in the following scenarios:</p> <ul style="list-style-type: none"> <li>• if P300 was approved, new Measurement Classes being available but couldn't be used because no DUoS tariffs available until April 2016; and</li> <li>• for P272, no migration period being available. In other words a bulk migration on the 1 April 2016 for all Profile Class 5 – 8 customers. This would be inappropriate and may</li> </ul>

Respondent	Response
	<p>result in a twelve months delay for P272.</p> <p>P300, on the other hand, is tied into BSC release dates and should the Ofgem decision be delayed beyond the 5 November 2014 then the implementation date would be the 25 February 2016. This is not a problem for DCP179 since the use of such Measurement Classes is not mandated by either DCP179 or P300, however it will make the migration of Profile Class 5-8 customers with whole current metering far more difficult to achieve (just over four weeks if implementation date is April 2016), and as such perhaps if this occurs the implementation date of P272 should be pushed back until June 2016.</p> <p>We would therefore suggest that the Ofgem decision for all three proposals is made at the same time i.e. by the 5 November 2014 at the latest. This has the advantage of:</p> <ul style="list-style-type: none"> <li>• providing certainty, at the earliest opportunity, of the direction the industry is heading; and</li> <li>• increasing a migration window to 17 months (rather than 13.5 months) for Profile Class 5-8 customers with CT metering and maintain a 5 months migration window for Profile Class 5-8 customers with whole current metering associated with P272.</li> </ul>
TMA Data Management Ltd	As depicted in the diagram in the consultation document, the benefits of DCP179 will not be realised until the implementation of P300. The Implementation Date must allow for changes to be progressed through the MRA so the proposed date of November 2015 is the earliest practical date following a decision. There is however limited time between the P300 and P272 proposed dates which will be further compressed if a decision is not made by Ofgem in time for a November 2015 implementation.
British Gas	No.
SmartestEnergy Limited	Please see answer to Q3. We would also note that there is a strong reliance on DNOs to implement correct links between MPANs and tariffs and LLFs in their systems.
Northern Powergrid	See response to question 5.
Western Power Distribution	The proposed implementation approaches appear to be sensible.
ScottishPower	P272 will require a substantial number of customers to move from NHH to HH and as such there will be a requirement for a large scale COMC exercise to be carried out for all customers. With an expected implementation date of late 2015 for P300, aligned with DCP179 we believe there is not sufficient time for industry to carry out the required COMC prior to P272 implementation, therefore we would suggest that while P272 is implemented from 1 April 2016 there is a

Respondent	Response
	<p>period of grace given to allow the industry to manage the COMC process. This period could be 9 months, i.e. All customers impacted by P272, which was implemented at 1 April 2016 must meet the P272 requirements by 31 December 2016.</p>
Haven Power Ltd	<p>There needs to be sensible spacing between the changes that P300, P272 and DCP179 are proposing with sufficient notice to allow suppliers to make the necessary systems changes.</p> <p>We do not feel that the interaction of these modifications and their potential to detrimentally impact customers has been adequately explored, nor have steps to mitigate this been discussed. For example how the different TNUoS charges that may be incurred by the customer will be handled.</p> <p>If a group of customers are settled half hourly when they were previously settled on a non-half hourly basis, then the split between HH and NHH TNUoS Demand Revenue will change; this may well lead to sudden step changes in TNUoS tariffs as they are adjusted for this redistribution of revenue. Customers will have these changes imposed on them, have to go through the inconvenience of contract variations they do not want, and then see potentially more expensive invoices which they will infer is as a result.</p>
SSE Energy Supply Ltd	<p>The implementation approach should allow for a 12 month lead time, from when both DCP179 and P300 are available, to the introduction of P272. This would then:</p> <p>(i) Enable the Supplier to implement a single migration plan</p> <p>Although Measurement Class E is available today to migrate CT connected Customers, the current DUoS changes would see a significant number of these Customer paying higher charges. The new Measurement Class G for Non-Domestic WC Customers would not be available until November 15, and it would be impractical to migrate these WC Customers first to Measurement Class E and then a further migration to Measurement Class G. A single migration, would be easier to manage for both the Supplier and its Agents, and DNO's, with less risk to Settlements, and a better customer experience, especially to those customers with a portfolio of both CT and WC metering systems.</p> <p>(ii) Enable Suppliers to manage their Customers' supply arrangements, the majority being on a 12 month rolling contract.</p>
UK Power Networks	<p>We appreciate the reasons for the different implementation dates for the three changes, and believe that the approach proposed for P300 (along with DCP179) is the most appropriate in order to deliver the required outcome at the earliest realistic possibility.</p>
RWE Npower	<p>The interaction between DCP179, P300 and P272 is paramount. With DCP179 and P300 seen as necessary enablers to P272 it is essential that industry has sufficient time between the implementation dates of DCP179, P300 and P272 implementation</p>

Respondent	Response
	<p>dates, should the modifications be accepted.</p> <p>It would be extremely challenging for Supplier Agents to handle large volumes of CoMCs in a short space of time. Suppliers would not be able to move MPANs from PC 5-8 to half hourly settlement until the new Measurement Classes were in place. DCP179 is anticipated to be implemented in April 2015 with P300 currently expected to be implemented in November 2015 or February 2016. This means suppliers will be in a position to move Current Transformer (CT) metered sites to the HH market (utilising Measurement Class E) following the implementation of DCP179 (but prior to P300 implementation) which would give 12 months to undertake this activity (should the current proposed dates be used). Following implementation of P300, suppliers will then be able to begin moving Whole Current (WC) metered sites to the HH market (utilising Measurement Classes F and G) giving suppliers either 5 or 2 months to undertake this activity depending on the implementation date.</p> <p>It is our understanding that approximately 55% of Profile Class 5-8 sites are WC metered meaning suppliers will be obligated to collectively move around 92,000 WC sites to the HH market within the space of either 5 or 2 months. On the basis of 21 working days per month, this equates to 975 or 2,190 CoMCs per day over this period. We believe this unprecedented level of CoMC activity poses a significant risk to settlement accuracy, particularly given the current process for CoMC is not fit for purpose and the improvements to this process (identified via Issue 49) have either been rejected by industry or where approved, have not yet been implemented. As a result, it is still commonly felt that the CoMC process is not fit to see 166,000 MPANs go through it within the proposed implementation period.</p> <p>Further, we note that some GSP Groups have a higher percentage of Profile Class 5-8 sites with WC meters (66% in certain GSP Groups) and given the propensity for certain suppliers to have larger portfolios in certain GSP Groups the relative number of CoMCs per day could be much higher. This again increases the risk to settlement accuracy.</p> <p>It is imperative that the implementation dates of all the changes should be considered as having consequential impacts on the other changes.</p>

## Question 5: What views do you have on the period of time between the P300 Implementation Date and the P272 Implementation Date?

### Responses

Respondent	Response
Scottish and Southern Energy Power Distribution	We have no comments at this time.
BES Commercial Electricity LTD	We believe that the time between P300 and P272 to be sufficient, but instead of a definitive date for implementing P272, we would prefer a window of 1 – 2 years so that the measurement class change can be implemented at end of contract or a change of tenancy so that customers current contracts are unaffected.
IMServ Europe	See our response to Q4.
Electricity North West	<p>See response provided under question 4.</p> <p>The Ofgem decision date is critical to the amount of time available to migrate from Non Half-Hourly to Half-Hourly settlement.</p> <p>We believe there is sufficient time to migrate the CT metered customers irrespective of when Ofgem make the decision on P300 but whether 1 or 5 months is sufficient for Profile Class 5-8 customers with whole current metering is not something we can comment on since this is dependent upon supplier volumes and their customer contracts and meter operator arrangements.</p> <p>The options here may be to delay P272 until June 2016 (giving a 4 or 8 month migration window) or let suppliers seek derogations to their licence obligations together with a migration plan based on a set of criteria be it customer contracts/meter operator contract renewal dates.</p> <p>For this modification we would urge a decision by 5 November 2014 as stated question 4 to allow for as much migration time as possible for P272.</p>
TMA Data Management Ltd	See response to 4.
British Gas	Our understanding is that the implementation of P272 is contingent of the approval of P300. We are surprised therefore that the Panel has chosen to consult on a new proposed implementation date ahead of final agreement of an implementation date for P300.
SmartestEnergy Limited	We think that 5 months is sufficient to allow the transition of CoMC. However, it is important that the tariffs and PCs continue to be available after April 2016 to cater for sites which have failed to migrate.
Northern Powergrid	If P272 were to be approved with an implementation date of 01/04/2016 and the P300 implementation were to slip from

Respondent	Response
	<p>November 2015 to February 2016, we would be concerned about the period of time between the implementation of P300 and P272. There would be a very narrow window (2 months) for Whole Current Metered PC 5-8 customers to migrate onto the new aggregated tariffs available following P300 implementation. We would much prefer to see the Authority decision made in time to facilitate November 2015 implementation.</p>
Western Power Distribution	<p>The 5 month period would appear to be enough time for suppliers to migrate their mpan.</p>
ScottishPower	<p>Regardless of when P300 is approved the timescale between its approval and the proposed implementation date for P272 is extremely short and as such will only provide an extremely limited period for Suppliers and their agents to move CT customers to HH tariffs and associated Measurement Classes.</p> <p>In addition there is little time to arrange the support for the introduction of the new tariffs and the resulting potential switch by Suppliers of Measurement Classes for those customers that choose to move. At the same time there is substantial change required within Supplier organisations to deal with the collection of the HH data and aggregate it for inclusion into D0030 Flows for DUoS Billing purposes. As noted elsewhere (P272 response) there is then potentially an immediate and further pressure on all parties to deal with the mandatory change of NHH MD records (Profile Classes 5-8) with CT metering to HH Settlement, which is introduced with the P300 timescales and might either lead to one or more 'switches' of status or not allow sufficient time to deal with the first stage of change (DCP 179 / P300) before the second stage (P272) is mandated.</p>
Haven Power Ltd	<p>CT meters make up approximately 45% of the total industry portfolio of 5-8 meters currently on supply. Under the current implementation timetable suppliers will have approximately thirteen months in total to change the measurement class for these non-domestic meters. For eight of those months suppliers are unlikely to install whole current meters unless absolutely necessary, as this would mean a further change of measurement class once a decision on P272 is made (so this action would not mitigate any of the system strain and could just exacerbate it). So there will be an eight month period where suppliers will be concentrating on changing CT meters, dealing with any issues which result and communicating this change to customers (alongside their day to day operations). Once the decision on P272 is made suppliers will then only have five months to change the measurement class for the remaining 55% of the 5-8 portfolio, and they are likely to still be dealing with issues which have resulted from the first bulk change. We simply do not believe that it is feasible for a smooth transition to occur in this timeframe and do not understand why the larger share of the portfolio is being given a shorter timeframe. A longer timeframe for</p>

Respondent	Response
	P272 implementation is necessary.
SSE Energy Supply Ltd	We believe there should be a minimum 12 month lead time between the two implementation dates.
UK Power Networks	We understand the concerns of some Suppliers over this period of time, however although we are comfortable with the approach proposed we would have concerns should this period of time be extended any further.
RWE Npower	<p>Npower's preference would be for suppliers to migrate an agreed volume of MPANs daily and then industry can take account of the constraints and issues the migrations throw up. This requires detailed planning by the industry. Paramount should be the customer experience as the CoMC process should be painless for the customer. Therefore our view is that:</p> <ul style="list-style-type: none"> <li>a) P272 should be implemented gradually, at least 24 months after the implementation of P300 and DCP179 (whichever modification is implemented latest).</li> <li>b) There is a centrally coordinated roll out of CoMC plans to ensure that impacts to settlements are minimised and there is no deterioration in customer experience.</li> </ul>

## Question 6: Do you have any further comments on P300?

### Summary

Yes	No
3	11

### Responses

Respondent	Response	Rationale
Scottish and Southern Energy Power Distribution	No	N/A
BES Commercial Electricity LTD	No	-
IMServ Europe	No	-
Electricity North West	Yes	<p>P300 does not mandate the use of the new Measurement Classes. It is designed to meet the criteria associated with DCP179. It is only when a supplier decides to settle a site half-hourly that DCP179 will indicate what tariff is to be used and what Measurement Class that is linked to. So in isolation the impact assessment and delivery implementation dates prescribed are acceptable.</p> <p>It is when P272 is overlaid on the timetable that there is a potential to cause concern. The industry, within its consultations and working group meetings, did consider the impact that all three changes (P272, DCP179 and P300) have on each other, and what was the best implementation order and timescale between each. It did recognise the majority of the industry could meet the proposed dates and that those who couldn't can seek derogations to either a code or their respective licences.</p> <p>We believe that the proposed timescales are achievable but this is only if Ofgem make such a decision for all three proposals by the 5 November 2014 to allow for a sensible migration timetable. Ofgem should have the information on each modification on the following dates:</p> <p>DCP179 –Change Declaration on 10 September;</p> <p>P300 – Panel decision on 11 September; and</p> <p>P272 – Panel decision on 11 September.</p> <p>This should allow Ofgem sufficient time (8 weeks)</p>



Respondent	Response	Rationale
		<p>to conclude on all three as suggested above.</p> <p>Finally, this shows that both codes can work together and consider the impact each have on the other in developing changes.</p>
TMA Data Management Ltd	No	N/A
British Gas	No	-
SmartestEnergy Limited	No	-
Northern Powergrid	No	-
Western Power Distribution	No	-
ScottishPower	No	-
Haven Power Ltd	Yes	<p>We have attached a copy of the letter that we have written to Ofgem and several industry panels outlining our concerns regarding the implementation timetable of P300, P272 and DCP 179 which forms part of our response to this question as it outlines several important issues that we feel are not being considered. It is simply not appropriate to deal with a change of this magnitude through a series of separate code changes. Much more has to happen, including a very significant expansion of capacity in the HH agent market. More consideration needs to be given to the impact on customers especially those with their own agent contracts. Our views are set out in the attached letter.</p>
SSE Energy Supply Ltd	No	-
UK Power Networks	No	No
RWE Npower	Yes	<ul style="list-style-type: none"> <li>Due to the way in which this modification has been raised (solely to enable the DCP179 solution) npower believe there is an unintended consequence which will see approximately 76,000 CT metered, non-domestic sites needing to change Measurement Class from A to Measurement Class E. This will see them move from a Measurement Class where their DUoS invoices are aggregated to a Measurement Class where the DUoS invoices will be site</li> </ul>

Respondent	Response	Rationale
		<p>specific. Npower feels this is an oversight and the impacts of this need to be considered by both DNOs who will need to provide site specific invoices to suppliers who will need to validate them individually. Within the P300 RPC document it states:</p> <p>"Without any mechanism for LDSOs to utilise and bill Suppliers on an aggregated basis, they will need to use site specific billing for these customers. This will be disproportionately expensive and not reflective of the actual DUoS."</p> <p>The absence of a Measurement Class suitable for the above mentioned 76k sites is an oversight that will add cost and inefficiency to existing processes as per the extract quoted above and will negatively impact these customers. This is something that was raised in the Working Group but the proposer (who is also the proposer of DCP179) would not alter the solution as P300 is purely to facilitate DCP179.</p> <ul style="list-style-type: none"> <li>Should DCP179 be implemented (currently targeted for April 2015) then Measurement Class E will only be available for Half Hourly, CT metered customers. P300 is currently proposed for implementation in November 2015 meaning that between April and November 2015, customers who are currently on Measurement Class E but not CT metered will have no appropriate Measurement Class. If P300 is implemented from November 2015, there will be a requirement to migrate all customers to their appropriate Measurement Class on that go-live day which npower feels this is an unreasonable approach.</li> <li>There will be customers currently on Measurement Class C who changed Measurement Class due to their demand exceeding 100kW. If their demand has now dropped, will these customers be allowed to change Measurement Class to F / G to get the benefits of a lower DUoS tariff implemented under DCP179?</li> </ul> <p>DCP179, P300 and P272 will see suppliers</p>

Respondent	Response	Rationale
		<p>needing to initiate a far wider range of CoMC activity:</p> <ul style="list-style-type: none"> <li>○ A to C, E, F or G.</li> <li>○ E to C when load exceeds 100kw or initially to G for any WC meters.</li> </ul> <p>This must be taken into consideration when deciding on whether to implement this modification and the timescales for doing so.</p> <ul style="list-style-type: none"> <li>• Npower are working hard with our customers to assure future costs via fixed priced products. Clarity over MPAN level charges is imperative as these contracts cover a significant future period. It is in the customer's favour to have absolute clarity of costs. Customers need certainty in these matters to support their own business plans.</li> </ul>