

CP Consultation Responses



CP1434 'Amend the three digit numeric Line Loss Factor Class (LLFC) Id to an alphanumeric LLFC Id'

This CP Consultation was issued on 9 March 2015 as part of CPC00754, with responses invited by 2 April 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
IMServ Europe	0/3	HHDA, HHDC, HHMOA
ScottishPower	5/13	Distributor, Generator, Supplier, Supplier Agents
Electricity North West Ltd	1/0	Distributor
Northern Powergrid	2/0	Distributor
British Gas	5/0	Supplier
RWE npower ltd	7/14	Generator, Supplier, Supplier Agent
UK Power Networks	3/0	Distributor
Stark Software International Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
GTC	1/0	Distributor
Gazprom Marketing & Trading Retail Ltd	1/0	Supplier
Western Power Distribution	4/0	Distributor
Scottish and Southern Energy Power Distribution	2/0	Distributor
Opus Energy Limited	3/0	Supplier

CP1434
CP Consultation Responses

7 April 2015

Version 1.0

Page 1 of 23

© ELEXON Limited 2015

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
EDF Energy	5/14	Generator, Supplier, Consolidator, ECVNA, MVRNA, CVA MOA, HHDA, HHDC, HHMOA, NHHDA, NHHDC and NHHMOA
E.ON Energy Solutions Limited	5/0	Supplier
SSE Energy Supply Limited	4/6	Supplier, NHHDA, NHHDC, NHHMOA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✓	✓	✓
IMServ Europe	✓	✓	✓	✓
ScottishPower	✓/✗	✓	✓	✗
Electricity North West Ltd	✓	✓	✓	✓
Northern Powergrid	✗	✓	✓	✗
British Gas	✓	✓	✓	✓
RWE npower Ltd	✓	✓	✓	✗
UK Power Networks	✓	✓	✓	✓
Stark Software International Ltd	✓	✓	✓	✓
GTC	✓	✓	✓	✗
Gazprom Marketing & Trading Retail Ltd	✗	✓	✓	✗
Western Power Distribution	✗	✓	✓	✗
Scottish and Southern Energy Power Distribution	✓	✓	✓	✓
Opus Energy Limited	✗	✓	✓	✗
EDF Energy Plc	✓	✓	✓	✗
E.ON Energy Solutions Limited	-	✓	✓	-
SSE Energy Supply Limited	✓	✓	✓	✓

Question 1: Do you agree with the CP1434 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
12	5	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
IMServ Europe	Yes	-
ScottishPower	Yes/No	<p>As a Distributor, we believe that before a full scale change is implemented, the full impact of the costs should be assessed, across all parties. We also feel that there is a requirement to clarify further the scale of the impacted parties in the Industry, and review of other potential solutions.</p> <p>We believe that there is merit in reviewing the number of existing tariffs, with a view to rationalising them before undertaking a costly change to increase the number even further.</p> <p>As a Supplier, we recognise there is a requirement to increase the number of LLFCs available to the industry and believe this is a sensible proposal.</p>
Electricity North West Ltd	Yes	<p>Whilst this is not currently an issue for Electricity North West as we have at present 838 spare LLFC codes, we understand the issue and the need to amend the LLFC from a 3 digit numeric code (INT(3)) code to alphanumeric (CHAR(3)) code.</p>
Northern Powergrid	No	<p>Although we support the need to amend the numbering convention of LLFCs due to limited availability, we would propose that rather than replace the three digit integer field with a three digit character field, the change proposal is amended so that it looks to extend the numeric length of the field from three to five. This would offer up to 99,999 combinations. We believe that overall cost extending the numeric LLFC to 4 or 5 digits could be significantly lower than an alphanumeric solution for some parties.</p> <p>Longer term, we feel that this change will be necessary, and as such would ask the group to consider any alternative options, including that proposed by Northern Powergrid. At this point, we</p>

Respondent	Response	Rationale
		feel that a more detailed impact assessment could be carried out by all parties.
British Gas	Yes	-
RWE npower ltd	Yes	-
UK Power Networks	Yes	-
Stark Software International Ltd	Yes	-
GTC	Yes	<p>We agree with the rationale provided by SSE in the change proposal. The limit placed on the number available has no perceived benefit and only limits parties ability to:</p> <ul style="list-style-type: none"> • Innovate solutions which include creating more LLFC's • Grow • Operate in the market place <p><u>Innovate solutions which include creating more LLFC's</u></p> <p>It is widely known that there have been changes which have not been progressed, developed further or alternatively withdrawn altogether simply because it would involve creating new LLFC's. This potentially, is preventing the market place from coming up with solutions which are innovative and/or a benefit to end consumers. We believe that this illustrates an unnecessary barrier which is actually perpetuating inefficiency and preventing benefits being passed on to consumers.</p> <p><u>Grow</u></p> <p>SSE outlined in their proposal that without this change it may restrict their ability to grow their business. We agree wholeheartedly that distribution businesses which operate in more than one GSP group under one licence are disadvantaged. To illustrate this point; we are expected to utilise 999 LLF's in 14 GSP areas as opposed to 999 in 1 GSP area. This is quite clearly inconsistent. For each new single LLFC which is to be mirrored we need to ensure that this is covered in all 14 GSP groups and for each voltage level. Taking the recent changes involved moving PCs 5-8 to HH settlement as an example we will need 168 LLF's under our ETCL licence to facilitate this</p>

Respondent	Response	Rationale
		<p>change. This will leave only 132 LLFC's left for this licence. Effectively if a new change were to be enacted which required further LLFC creations, it would be very difficult if nigh on impossible to facilitate as there is not another 168 available. This will therefore affect these types of businesses ability to grow, innovate and ultimately operate in the market place effectively.</p> <p><u>Operate in the market place</u></p> <p>We believe that this is an issue which will ultimately affect all distribution businesses and their ability to operate in the market place.</p> <p>There are some fundamental flaws with placing a barrier on this data item. For example, LLFC's have to be attributed uniquely to EHV supply points and the number of EHV sites is not limited to a maximum value i.e. 999. Whilst 999 is an unlikely maximum number in each GSP group it does illustrate that this is a fluctuating value with no definitive end point. It is also known that each distribution business will need to have a stock of LLFC's which will need to be in place at all times to cover losses and distribution billing. This stock of numbers is also not expected to be a static value as some change proposals will still be necessary and therefore developed and/or passed for e.g. DCP179/P300/P272. If these values are not static and it is a requirement to hold them to account for losses correctly on the network then we do not believe that limiting the value to 999 is an achievable long term requirement. Essentially both data sets (EHV and stock numbers) are not controllable long term and are only likely to increase and not decrease in any significant way.</p> <p><u>Summary</u></p> <p>SSE and GTC have already identified that there is a need for this change and we have demonstrated that other parties will be affected or will have the same issue in the future posing a problem for sustainability. We know that it will affect competition in the market place and that it may affect GTC and others in the short term. We also know that this barrier is affecting parties' ability to suggest change or get changes through which affect this data item. This in turn demonstrates that there may be unrealised benefits to end consumers. Therefore we are fully supportive that this change</p>

Respondent	Response	Rationale
		will address these issues in the long term and create a sustainable and efficient environment for parties affected by this issue.
Gazprom Marketing & Trading Retail Ltd	No	<p>We believe there will be a significant impact on suppliers systems, including our own.</p> <p>LLFCs are held in multiple systems and it is likely to require significant resource and cost to develop and test the required system changes. Therefore, we believe other options should be considered such as whether site specific LLFCs are required or whether DNO systems/charging methodologies can be amended to cater for alternatives.</p>
Western Power Distribution	No	<p>We agree that something needs to be done however we do not believe the change has been fully developed. It is unclear what if anything needs to be done about existing 1 or 2 digit LLFCs such as LLFC 30. Does it become "030" or " 30" or "30 "? We would also prefer that industry is requested to consider again the option of retaining LLFC as a numeric value but increasing the size of the field. It is possible that the costs involved in doing this may have changed since it was last assessed.</p>
Scottish and Southern Energy Power Distribution	Yes	<p>Increasing the number of LLFCs available would promote competition in supply and distribution. The implementation of P300 (DCP179) along with the rollout of smart metering, smart grid and other innovative products will require significantly more LLFCs. Further, it is anticipated that with increasing awareness of the availability of competitive supply choice in private networks, LDSOs will require additional LLFCs. This solution offers a 'common sense' approach to the shortage of LLFCs with a solution that requires no migration or amendments to existing LLFCs and will only be used once the current supply of LLFCs is used.</p>
Opus Energy Limited	No	<p>We acknowledge, because the LLFC code is currently a 3 digit numeric code that as this restricts use to 999 codes (excluding using "000") a solution is required to follow on after 999 has been reached. Our expectation was that once the current 3 digit numeric code has been exhausted at 999, that there would be a logical transition to use of a 4 digit numeric code (e.g. moving onto 1,000 and so on). Our systems are future-proofed and can cope with the move to use of a 4 digit numeric code, where as the proposed switch to an alphanumeric code would incur significant system development costs, which</p>

Respondent	Response	Rationale
		would necessitate a project to change our frontline applications.
EDF Energy Plc	Yes	<p>We recognise the need for the solution and it is intended to lessen impact on parties with respect to changes required, for our role as a Supplier we do not believe we would need to make changes to our billing system however there are significant changes required elsewhere which we detail in answer to question 3.</p> <p>In terms of the solution we would like clarification with respect to permissible alphanumeric characters. The solution indicates over 39,304 permutations which we understand to be characters 0-9 and 24 letters of the alphabet (given exclusion of I and O) this provides for 34 x 34 x 34 combinations (39,304). If the intention is to only allow upper case characters we would like to be clarified, particularly as we do not believe both upper case and lower case could operate together.</p> <p>Similarly we would like clarification with respect to current Line Loss Factor Class Id (LLFC) values. These are currently integer values therefore would 1 become 001? Equally would a party only be able to raise an MDD request for a 3 digit LLFC such as A00, and not A0? We are not clear where this is defined or how this is validated.</p>
E.ON Energy Solutions Limited	Other	Whilst we understand the logic for the change, it is not clear from the CP forms when the limit will be reached and therefore what is driving the timescales for this.
SSE Energy Supply Limited	Yes	<p>We understand the rationale for this change and firmly agree that the proposed solution is the most efficient and lowest impact method to increasing the number of available LLFCs. BSC arrangements should not inhibit the growth and development of smart grid and smart metering markets, to the extent that where such barriers exist plans should be set in train to address them.</p> <p>Though not mentioned within the consultation, as part of our analysis we considered the feasibility of extending the LLFC. It was shown that this would have a higher cost and impact on our systems, as such we support this proposal.</p>

Question 2: Do you agree that the draft redlining delivers the CP1434 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
12	4	1	

Responses

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

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
IMServ Europe	Yes	-
ScottishPower	Yes	-
Electricity North West Ltd	No	We agree if in Appendix 1 New MDD Entity 63 the reference to LLFC Data Type/Length is changed from Integer (3) to Character (3) and in 'Other Information', Mandatory is changed to say Excludes '000' and any combination using 'I' or 'O'.
Northern Powergrid	No	Appendix one has areas which have not been updated to show the LLFC has changed to a character field as per this proposal.
British Gas	Yes	-
RWE npower ltd	Yes	-
UK Power Networks	No	See Appendix 1 below.
Stark Software International Ltd	Yes	-
GTC	Yes	-
Gazprom Marketing & Trading Retail Ltd	Yes	-
Western Power Distribution	No	The red-lining amends the LLFC to char(3). However it would be of benefit if it was specified that characters must be alphanumeric.
Scottish and Southern Energy Power Distribution	Yes	The amendment of the LLFC to the 3 alpha numeric characters will deliver the solution by increasing the availability of LLFCs for future use. We do feel that

Respondent	Response	Rationale
		the inclusion of an example of an alpha/numeric LLFC would be beneficial.
Opus Energy Limited	No comment	(No comment)
EDF Energy Plc	Yes	However as discussed in answer to question 1 we would like clarification with respect to permissible characters which is not defined in the current redlined documentation.
E.ON Energy Solutions Limited	Yes	-
SSE Energy Supply Limited	Yes	-

Question 3: Will CP1434 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
17	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	CP1434 would impact our HHDA system and the centrally developed NHHDA system. .
IMServ Europe	Yes	-
ScottishPower	Yes	<p>As a Distributor, we will require a change to Industry Systems to allow for the management of the changes to multiple flows containing the LLFC (approximately 15), this will require significant changes to multiple BSC systems, associated documents and reporting requirements. We believe that a full cost Impact Assessment is required.</p> <p>We will be impacted as a Supplier, NHHDC/DA, HHDA/DC and as NHH and HH MOA. As Supplier we will be required to make significant changes to our DUoS and HH Energy Volume Validation systems in addition to changes to our billing and registration systems.</p>
Electricity North West Ltd	Yes	We will need to make the required changes to amend the numerical field to an alphanumeric field in our billing systems. This will require system changes including validation checks and will incur costs.
Northern Powergrid	Yes	<p>Northern Powergrid uses a number of systems to manage settlements data. The following systems will have to be updated to align with this change to the LLFC:</p> <ul style="list-style-type: none"> • MPRS • DUoS Billing System • LLF Adjustor - System that applies the LLFCs based upon the top line data from the supplier. • Unmetered Supply system • MPAN generation system • Internal Spreadsheets/databases -

Respondent	Response	Rationale
		<p>Regulatory reporting, charge setting and forecasting models</p> <p>With the update to these systems, there will need to be management on the basis of a number of projects which will look to explore and gather the requirements; allow time for the build of the system (either in-house or by the third party who support these) and user acceptance testing.</p>
British Gas	Yes	-
RWE npower Ltd	Yes	We understand this will be a change across the industry, this will impact major systems across npower Business both within operations, sales and pricing with most systems having to be reconfigured to process an alpha character. This could have a number of impacts, similar to when the Gas Industry changed the End User Code (EUC) from 3 digits.
UK Power Networks	Yes	We will need to make a system change to the DNO DUOS billing system and SMRS MPRS.
Stark Software International Ltd	Yes	Checks and possible changes to HHDA standing data import and Aggregation processes.
GTC	Yes	We will need to make changes to our software systems in order to make this change.
Gazprom Marketing & Trading Retail Ltd	Yes	<p>Yes, we have only been able to undertake high level analysis of the impact of CP1434 on our organisation. We view the change in isolation as a significant change, affecting the majority of systems we use for electricity.</p> <p>When CP1434 is considered alongside the other ongoing change in the industry we believe the impact is even more significant and as such other options should be explored that do not require supplier system changes. Or if this change must go ahead then we believe a longer lead time should be given to allow for less overlap with other changes such as Project Nexus and P272 implementation.</p>
Western Power Distribution	Yes	Major changes to systems, forms and flows that use the LLFC.
Scottish and Southern Energy Power Distribution	Yes	The impact on our organisation, overall, is a positive one. End customers would benefit as additional LLFCs would enable more competition, innovative products, tariffs and services to be developed and offered. E.g. demand side response offerings.

Respondent	Response	Rationale
Opus Energy Limited	Yes	Our systems have been designed to cope with the move to use of a 4 digit numeric code; where as the proposed switch to an alphanumeric code would incur significant system development costs, which would necessitate a project to facilitate changes to all of our frontline applications. We would expect this to require around 4 weeks development plus 4 weeks testing and implementation.
EDF Energy Plc	Yes	A number of different systems store and use the Line Loss Factor Class Id therefore significant changes would be required to allow those values and also convert the format of standing data. As highlighted in the consultation changes to the DTC will be required to a number of dataflows which will also required change to our data transfer systems.
E.ON Energy Solutions Limited	Yes	Yes. The change to either four digit or alpha numeric codes will incur major changes to a large number of systems and processes. LLFCs are stored in many systems and used in a variety of processes.
SSE Energy Supply Limited	Yes	This is not minimal change and will impact multiple systems.

Question 4: Will your organisation incur any costs in implementing CP1434?

Summary

Yes	No	Neutral/No Comment	Other
17	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
IMServ Europe	Yes	<p>There will be a one off development cost on our HHDC/DA systems of an estimated 60 days of effort.</p> <p>This will impact us in multiple ways including the D0040/D0298/D0357 flows and will have audit reporting implications as well. This will require a significant amount of testing effort also.</p> <p>Again, given the short timescales between these CPs being approved and the proposed implementation date, we have carried out a detailed analysis of the impact on our HHDC/DA activities in order to be confident the above estimate is accurate.</p>
ScottishPower	Yes	<p>If this change were implemented, as a Distributor we will incur significant IT costs to accommodate the data item changes within the flows, changes to our internal Registration and billing system (MPRS and Durabill) and other linked internal systems changes (e.g. Tariff Validation). Assessment of this change in its entirety is still undergoing assessment</p> <p>Indicative costs currently sit in the region of £25k for MPRS and £130K for Durabill (shared across users). These costs exclude internal UAT costs, which have not yet been determined, but can be estimated to be in the region of £50k - £100k.</p> <p>As a Supplier, initial Impact Assessments have identified one-off costs of £20k-£35k require to implement this change.</p>
Electricity North West Ltd	Yes	We will incur costs for making this change in our billing systems
Northern	Yes	As within question four, each of our systems/reporting models will need to be amended

Respondent	Response	Rationale
Powergrid		<p>in line with the change to LLFC. Below we have detailed the system and estimated costs:</p> <p>MPRS: ~£8k one off cost.</p> <p>This is an initial estimate from our service provider which includes the development test and delivery of this change. The change will have to be scheduled as an additional release to the current calendar.</p> <p>DUoS Billing System: ~£37k one off cost.</p> <p>This is an initial estimate from our service provider which details that a number of database tables, database screens, packages and reports will need to be amended and tested. In addition, it will be necessary to carry out regression testing on the system.</p> <p>LLF Adjustor:: ~£25k one off cost</p> <p>This is an initial estimate based upon previous changes. Given the nature of this system and that it is driven by the LLFC, there will be a fundamental change to the system at a database level.</p> <p>Unmetered Supply system: ~£10k one off cost</p> <p>This is an initial estimate based upon previous changes. The change to this system is lower impact as the LLFC is only referenced in a small number of tables and screens.</p> <p>MPAN generation system: ~£10k one off cost</p> <p>This is an initial estimate based upon previous changes. The change to this system is lower impact as the LLFC is only referenced in a small number of tables and screens.</p> <p>Other; Regulatory reporting, charge setting and forecasting models ~£5k one off cost</p> <p>This is an initial estimate based upon previous changes of a similar nature. All of these reporting tools will need to be amended and tested, as they have the LLFC present in some form.</p> <p>This results in costs at ~£95k in total. We do not envisage any ongoing costs associated with this change.</p> <p>It should be noted that the costs are our first assessment, which can be confirmed via a detailed impact assessment once the final options have been</p>

Respondent	Response	Rationale
		decided.
British Gas	Yes	Full details of the costs are not yet known
RWE npower Ltd	Yes	Major system change costs.
UK Power Networks	Yes	We will incur one off system change costs.
Stark Software International Ltd	Yes	One off cost. Approx 3 man days.
GTC	Yes	<p>We will incur one off costs to amend our systems to accommodate the new data item and put in place any relevant validation checks. We will need to amend our:</p> <p>LDSO Asset Database</p> <p>Billing system</p> <p>An amendment will also need to be made to SMRS but this is shared by all LDSOs.</p> <p>We are unable to provide estimated costs at this time, as these are still being assessed.</p>
Gazprom Marketing & Trading Retail Ltd	Yes	<p>Yes – these should largely be one-off costs where existing customers LLFCs remain the same. However, where existing customers have their LLFC changed this would lead to later costs both in terms of systems and the potential need to communicate with customers, deal with queries etc. that would result from a change in LLFC. Therefore, as much certainty as possible that existing LLFCs will not be altered is essential.</p>
Western Power Distribution	Yes	<p>Primarily system development costs updating our systems to accept a character field instead of a numeric field. Estimated at around £50,000. These costs would reduce slightly if the LLFC was changed to a 4 or 5 digit field.</p>
Scottish and Southern Energy Power Distribution	Yes	<p>There will be IT costs to ensure systems can send and accept LLFCs with alpha/ numeric characters. Initially we believe this to be a small change to allow alpha/numeric fields on data tables. The costs increase if validation is required on characters 'I' and 'O' adding complexity and additional costs. We would need to carry out more detailed analysis to determine final costings.</p>
Opus Energy Limited	Yes	<p>A change from a 3 digit numeric code to a 4 digit numeric code would not have cost impacts. However, the proposed change to an alphanumeric</p>

Respondent	Response	Rationale
		code would require changes, under a project, to all of our frontline applications. We would estimate costs in the order of £25,000 to change to use of an alphanumeric code.
EDF Energy Plc	Yes	<p>We would incur on-off costs to our systems to ensure new values can be stored, transmitted and processed. We would also require conversion from integer format to alphanumeric characters, including potential change to pad unused characters in current format with leading zeroes, e.g. if 1 would become 001. The costs involved varies dependent on the solution which we would like further clarification on.</p> <p>Similar changes would be required with respect to our data transfer systems. This impacts a number of current dataflows containing this data item that we send or receive as well as two other dataflows which are current being considered for change through the MRA. All of these flows would be required to be changed and tested.</p>
E.ON Energy Solutions Limited	Yes	It is not clear what the total cost will be at this time. The change to either four digit or alpha numeric codes will incur major changes to a large number of systems and processes. It is however likely to be a substantial value.
SSE Energy Supply Limited	Yes	The costs will be due to system change.

Question 5: Do you agree with the proposed implementation approach for CP1434?

Summary

Yes	No	Neutral/No Comment	Other
9	8	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The costs should be low.
IMServ Europe	Yes	-
ScottishPower	Yes/No	We recognise the proposed implementation date of April 2016 as challenging for us as Suppliers but anticipate this change will be even more challenging for DNOs. As a Distributor we believe that the implementation approach may not allow adequate time for systems updates, and business processes and training to be rolled out in advance of the change.
Electricity North West Ltd	Yes	Yes we agree with the proposed implementation.
Northern Powergrid	No	Given the volume of market change at present; P272, P300, DCP161 (to name just a few) Northern Powergrid has currently reached maximum capacity levels in terms of resourcing this type of change and adding this change would affect the delivery of other vital industry changes. As such, our proposal would be that this change would be implemented from April 1, 2017.
British Gas	Yes	-
RWE npower ltd	No	We would prefer to delay the implementation date due to the size and scale of this change, and other approved industry wide changes also requiring system changes going through at the same time.
UK Power Networks	Yes	We would like a minimum six month implementation window so 1 April 2016 is acceptable.
Stark Software International Ltd	Yes	-
GTC	No	It is difficult to support the implementation date at present due to the uncertainty surrounding P272.

Respondent	Response	Rationale
		<p>We believe it would be beneficial to have this implemented before P272 goes live however system development may restrict this possibility for some parties.</p> <p>In addition as the LLFC does form part of DUoS billing, if these changes are not implemented until after the effective from date of the charging statement (1st April) we could anticipate that it would be difficult to include the new LLFC's in that statement. These LLFC's could then not be included in the DUoS statement until 15 months later, therefore pushing out any benefits to a much longer time frame.</p>
Gazprom Marketing & Trading Retail Ltd	No	We believe a longer lead time for implementation would be desirable, perhaps November 2016 or April 2017 given the significant system changes currently underway.
Western Power Distribution	No	-
Scottish and Southern Energy Power Distribution	Yes	We fully support the implementation approach for CP1434 as it is the least disruptive to industry. Without having the need for a data migrations and / or amendments to current LLFCs it is future proofing the tariffs and customer offerings into the future.
Opus Energy Limited	No	No, as set out in our comments above, we favour use of a 4 digit numeric code rather than a change to an alphanumeric code. We do understand that a change to a 4 digit numeric code would necessitate BSC changes, but, as an independent Supplier, the development costs associated with a change to an alphanumeric code would impact us, at a period of high volume of industry change including major developments such as Smart and Project Nexus.
EDF Energy Plc	No	<p>The change would require an amendment to the DTC to enable the J0147 data item to allow alphanumeric characters. As such we believe the implementation date should align to a DTC scheduled release.</p> <p>The solution does involve change to various systems and a number of dataflows which would make the 1st April 2016 deadline particularly challenging.</p>
E.ON Energy Solutions Limited	Other	<p>The proposed timescale is extremely challenging.</p> <p>LLFCs are used in many different tasks on a daily basis. Co-ordination of the change will therefore</p>

Respondent	Response	Rationale
		need careful planning to ensure all consequential impacts are known and understood. With the impending migration of a large volume of meters under P272 it would be helpful (if the P272 end date changes), that the implementation date for this change moves accordingly, so that the changes do not fall mid-migration.
SSE Energy Supply Limited	Yes	We would have less than 12 months to implement this change. Initial analysis indicates this implementation date will be very challenging.

Question 6: Do you have any further comments on CP1434?

Summary

Yes	No
2	15

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	-
IMServ Europe	No	-
ScottishPower	No	-
Electricity North West Ltd	No	-
Northern Powergrid	Yes	We would like to reiterate that Northern Powergrid would request the group to give consideration to our suggested alternative approach detailed in response to Question 1.
British Gas	No	This data item occurs in 15 data flows (not filtered by party) and is likely to require extensive end to end testing and feeds. It is expected the DTC change will be implemented in February 2016, permitting short timescales for end to end testing given wider industry change being deployed in October 2015 and the subsequent 'bedding in' that will be required.
RWE npower ltd	No	-
UK Power Networks	No	-
Stark Software International Ltd	No	-
GTC	No	-
Gazprom Marketing & Trading Retail Ltd	No	-
Western Power Distribution	Yes	We have voted "no" to this change this as we consider further assessment of other options and some clarification is needed. We acknowledge that a change is needed.

Respondent	Response	Comments
Scottish and Southern Energy Power Distribution	No	Not at this time.
Opus Energy Limited	No	-
EDF Energy	No	-
E.ON Energy Solutions Limited	No	-
SSE Energy Supply Limited	No	-

BSCP509 Appendix 1

Respondent	Location	Comment
Electricity North West Ltd	New MDD Entity Id 63	The reference for LLFC Data Type/Length is changed from Integer (3) to Character (3) and in 'Other Information', Mandatory is changed to say Excludes '000' and any combination using 'I' or 'O'
Northern Powergrid	Page 12 – MDD entity Id 63, valid MTC/LLFC/SS C/PC	Line Loss Factor Class Id is still referenced as Integer (3), this should be Character (3).
UK Power Networks	MDD Entity Id 17 Line Loss Factor Class Id (page 15)	The data type/length description should say "3 alphanumeric characters". The valid values for this in brackets in the red line draft of "(0-999)" have been replaced with a valid data set of "(3)" which should be removed.
UK Power Networks	MDD Entity Id 17 Examples (page 15)	The second example needs to be changed. It shows an LLFC Id of "0". A three character alpha numeric code would now be appropriate in this example.