P320 'Reporting on Profile Classes 5-8 Metering Systems after the implementation of P272'

This Assessment Procedure Consultation was issued on 15 May 2015, with responses invited by 5 June 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Western Power Distribution	4/0	Distributor
TMA Data Management Ltd	0/1	Supplier Agent
SmartestEnergy	1/0	Supplier
E.ON Energy Solutions	1/0	Supplier
Npower ltd	9/0	Supplier; Generator; Supplier Agent
SSE Energy Supply Limited	1/0	Supplier
ScottishPower	1/0	Distributor
EDF Energy	9/0	Generator; Supplier; Non Physical Trader; Supplier Agent
British Gas	1/0	Supplier

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Question 1: Do you agree with the Workgroup's initial unanimous view that P320 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	It clearly meets objective d as it is a more efficient and more cost effective solution.
TMA Data Management Ltd	Yes	P320 better facilitates objective d as it is a more efficient way to deliver the BSC obligations.
SmartestEnergy	Yes	-
E.ON Energy Solutions	Yes	-
Npower ltd	Yes	We would support this modification which is looking at a monthly report outside of any amendments to PARMS Serials. It avoids making any amendments to existing PARMS Serials or creation of a new serial, and the report would be produced independently of suppliers and so avoids the need for suppliers to create the report themselves.
SSE Energy Supply Limited	Yes	We agree with the Workgroup's view that the Applicable BSC Objectives C and D will be better facilitated by this modification.
ScottishPower	Yes	-
EDF Energy	Neutral	If the costs quoted to implement P272 SP04 charging are correct and unavoidable, then there is an argument that BSC Objective (d) (effective BSC operation) would be better met by the proposal because the implementation cost would probably exceed the benefit of the charging change (which would incentivise every last PC5-8 import meter to incur costs to switch through a high assumed cost for non-compliance). It is also probably true that the existing SP04 charge determined historically for 100kW sites (4.11 £/day, 1500 £/year) is too high for the relatively smaller energy volumes associated with below-100kW sites currently in PC5-8, and removing the charge for PC5-8 may better meet BSC Objective (c) concerning competition by

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Respondent	Response	Rationale
		reducing excessive charges for non-compliance. However, removing the P272 charge for PC5-8 altogether could reduce incentives to comply with P272 and hence act against BSC Objective (c) concerning competition, by allowing parties who don't comply to avoid costs incurred by those who do. Is there a better way of delivering the charging change (eg. use data in Supplier Purchase Matrix) and would a lower charge be more appropriate? These potential alternatives could tip the balance towards maintaining charges, so maintaining simple incentives to settle current NHH meters with maximum demand recorded (ie. PC5-8) half-hourly instead, while avoiding the need for special new reporting.
British Gas	Yes	We believe that BSC Objective C is better facilitated as it will not result in Suppliers being treated inequitably for not converting sites to HH despite taking all reasonable steps. We believe BSC Objective D will be improved as it will remove unnecessary complexity and cost in implementing P272. The reporting of non-compliance will be completed by Elexon and presented to the PAB whilst avoiding PARMS system changes that are currently required under the P272 redlining.

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Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P320?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	-
TMA Data Management Ltd	Yes	-
SmartestEnergy	No Comment	-
E.ON Energy Solutions	Yes	-
Npower ltd	Yes	-
SSE Energy Supply Limited	Yes	The legal text has been reviewed and we agree it accurately meets the intent of P320.
ScottishPower	Yes	-
EDF Energy	Yes	-
British Gas	Yes	-

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

Summary

Yes	No	Neutral/No Comment	Other
8	1	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	We agree with the implementation date however we note it will be dependent on MRA approval process for granting access to the required data. Therefore BSC Panel should defer making a recommendation to the authority until such approval has been given by MEC.
TMA Data Management Ltd	Yes	Yes, the implementation of P320 should be aligned with the implementation date of P272 or P322 if it is approved.
SmartestEnergy	Yes	-
E.ON Energy Solutions	Yes	Yes, this would seem sensible, although we are mindful of the concurrent urgent p322 change that may or may not impact timing. However believe there should be flexibility to enable earlier production of reports if required by PAB.
Npower ltd	Yes	We agree that the implementation date should be in line with P272, however should P322 be successful then the proposed implementation date of 1 April 2016 will need to amended to a later date to once again be in line.
SSE Energy Supply Limited	Yes	We are supportive of the Workgroup recommendation of 1st April 2016, noting this may require further consideration if P322 is approved.
ScottishPower	No	While P272 is due to go live on 1 April 2016, it will be possible for PC5-8 customers to migrate from 5th November 2015 after the implementation of Modification P300, therefore given this possibility we believe that P320 should be implemented on 5th November 2015 to ensure consistency with other related industry changes.
EDF Energy	Yes	The legal text can only be implemented on or after the date of P272 implementation, because it undoes P272 changes. Implementation at a later date would not achieve the savings in P272

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Respondent	Response	Rationale
		implementation cost which (it is argued) justify the proposal. Early decision to approve would avoid nugatory costs being incurred on developing the current P272 solution.
British Gas	Yes	We agree with the Workgroup's recommendation that this should be implemented in line with P272 which is currently 1.04.2016. We believe that the implementation date will have to consider the possible approval of P322. If P322 is approved then the P320 implementation should be delayed to stay in line with the P272 implementation.

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Question 4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P320 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	-
TMA Data Management Ltd	Yes	-
SmartestEnergy	Yes	-
E.ON Energy Solutions	Yes	Yes, this is a pragmatic approach that will reduce overall costs for parties.
Npower ltd	Yes	-
SSE Energy Supply Limited	Yes	-
ScottishPower	Yes	-
EDF Energy	Other	I think Elexon/SVAA could use Supplier Purchase Matrix information (aggregate numbers of energised metered import meters in each NHH profile class for each supplier, available from D0082 in a similar manner as proposed for P315) to provide information on numbers of energised metered sites in PC5-8 for SP04, with only minor supplier developments required. Combining this with a reduced charge for SP04 would maintain liquidated damages to other market segments (for HH settlement not being used), and maintain financial incentive to comply, without requiring detailed new reporting and monitoring and associated administrative costs.
British Gas	Yes	-

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Question 5: Will P320 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No	-
TMA Data Management Ltd	No	-
SmartestEnergy	Yes	There will be a small amount of manual reporting required to submit to PAB and therefore a small amount of FTE time diverted from other tasks. However we feel this can be absorbed.
E.ON Energy Solutions	Yes	P320 solution will reduce workload by removing requirements under P272 that would otherwise have to be implemented for a limited period.
Npower ltd	No	-
SSE Energy Supply Limited	Yes	We would be positively impacted through reduced costs as a result of not implementing PARMS changes.
ScottishPower	No	Given the proposed report is to be created direct from ECOES we do not see its production impacting on us directly.
EDF Energy	Yes	There would be small impacts on our preparations for P272, relating to supplier charge process changes and impacts of supplier charges on future customer tariffs.
British Gas	Yes	P320 removes the PARMS requirements from implementing P272 that would have impacted us as a Supplier. P320 will see our SP04 reporting remain unchanged.

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Question 6: Will your organisation incur any costs or cost savings in implementing P320?

Summary

Yes	No	Neutral/No Comment	Other
3	5	0	1

Responses

Respondent	Response	Rationale
Western Power Distribution	No	-
TMA Data Management Ltd	No	-
SmartestEnergy	Yes	Any removal or addition of serials is a system change and therefore has a cost associated. We have not made any changes in anticipation of the original P272. P320, therefore, represents a cost saving.
E.ON Energy Solutions	Yes	Potential cost savings would result from this as no requirement to provide additional PARMS reporting, that would otherwise have been required under P272 for a limited period.
Npower ltd	No	-
SSE Energy Supply Limited	Yes	There would be low costs to implement this solution. If P320 is not implemented then the resulting PARMS costs, both at implementation and later to implement removing them (subject to second modification being raised) would be significantly higher, with no perceivable benefit.
ScottishPower	No	-
EDF Energy	Other	There would be small one-off savings in the costs otherwise incurred for implementing the Supplier Charge elements of P272. On-going costs would depend on the effort required to support the processes proposed by P320, which would depend on achieved levels of compliance, compared with the Supplier Charges which would be incurred under P272 as currently specified.
British Gas	No	The current baseline of P272 will mean suppliers will be subject to excessive liquidated damages which would exceed any genuine pre-estimate of loss resulting from failure to meet the required standard. As a Supplier we would have to dedicate more

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Respondent	Response	Rationale
		resource to manage our performance and reporting. P320 will remove the changes to PARMS that P272 will introduce resulting in Suppliers continuing reporting as is currently required.

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Question 7: Will your organisation incur any costs in removing a PARMS Serial if it is no longer needed?

Summary

Yes	No	Neutral/No Comment	Other
5	2	2	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No Comment	-
TMA Data Management Ltd	No	-
SmartestEnergy	Yes	See answer to Q6.
E.ON Energy Solutions	Yes	Minimal. Reporting would be switched off when no longer required.
Npower ltd	No	-
SSE Energy Supply Limited	Yes	It would be one-off low cost impact.
ScottishPower	No Comment	-
EDF Energy	Yes	Relative to a baseline of supporting PARMS data as currently proposed for P272, there would be small one-off cost to remove a PARMS Serial. There would be on-going savings in no longer supporting a removed PARMS Serial. There would be ongoing changes in net costs and benefits arising from removal of a chargeable PARMS Serial.
British Gas	Yes	We will incur costs in removing the PARMS serial as P272 currently requires Suppliers and Agents to alter the SP04 reporting they complete. The change to SP04 report will include sites that have not been migrated from NHH to HH. The cost will not be felt in removing the PARMS serial altogether but a cost will be incurred in altering the SP04 serial to revert to only reporting on sites that have broken the 100kW threshold.

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Question 8: Do you have any further comments on P320?

Summary

Yes	No
4	5

Responses

Respondent	Response	Comments
Western Power Distribution	Yes	As noted in response to question 3. The modification assumes access to ECOES data will be granted. This decision will be made by MEC and their agreement to permit Elexon to access the data from the ECOES service provider should be obtained prior to this modification being sent to the Panel.
TMA Data Management Ltd	No	-
SmartestEnergy	No	-
E.ON Energy Solutions	No	-
Npower ltd	No	-
SSE Energy Supply Limited	No	-
ScottishPower	Yes	We note that there is no reference to how the report will be communicated to interested parties other than PAB. It is hoped that the report will be circulated to the appropriate companies in due course, potentially including DNOs, who while not directly impacted will be involved in all the registration and MC/PC changes arising from P272 (and P300) so they will have an interest in the progress and outcomes of the records expected to be affected.
EDF Energy	Yes	There are obvious interactions with proposal P322 which if approved would change the start date for some features of P272, and would probably require changes to the supplier performance and charging elements of P272 to support phased implementation. P272/P322 does not apply SP04 Supplier Charges to P272/P322 meters until 1 April 2016, but from that time the charge would only apply to a subset of advanced meters in PC5-8, according to the progression of changes of supplier or renewals of contracts. Determination of meters

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Respondent	Response	Comments
		to which SP04 charges would apply from that time under P322, without P320, would probably be more complicated than under P272 itself.
British Gas	Yes	We believe that the Elexon created report is the simplest and most efficient method to track Suppliers Performance in implementing P272. The PAB can stipulate what information they would like to see in the report and can alter the regularity of the report if it becomes repetitive. We believe the current baseline of reporting through the SP04 serial will not provide enough information to the PAB to inform their decisions in using the PAF techniques.

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EPGNRG Confidential Response:

P272 and subsequent reporting will have no effect on EPGNRG as ALL our MPANs are already HH settled.

Thus we wish to take a neutral stance in the implementation of P272 and subsequent 'knock-on' changes, thus no formal response form.

That said P320 is a significantly cheaper option and should be supported.

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