# P339 'Introduction of new Consumption Component Classes for Measurement Classes E-G'

This Assessment Procedure Consultation was issued on 21 September 2016, with responses invited by 12 October 2016.



## Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---|---|---|
| British Gas Ltd | 1/0 | Supplier |
| IMServ Europe | 0/6 | HHDC, HHDA, HHMOA, NHHDC, NHHDA, NHHMOA |
| Npower Group | 3/1 | Supplier, Generator, Non physical trader, HHDC |
| OVO Energy | 1/0 | Supplier |
| Power Data Associates Ltd | 0/1 | Meter Administrator |
| Salient Systems Limited | 0/1 | HHDC/DA Solutions Provider |
| ScottishPower | 1/1 | Supplier, HHDC |
| SmartestEnergy | 1/0 | Supplier |
| SP Distribution / SP Manweb | 1/0 | Distributor |
| SSE Energy Supply Limited | 1/0 | Supplier |
| Stark | 0/4 | HHDC, HHDA, NHHDC, NHHDA |
| TMA Data Management Ltd | 0/4 | HHDC, HHDA, NHHDC, NHHDA |
| UK Power Networks Operations Ltd | 1/0 | Distributor |
| Electricity North West | [Not provided] | [Not provided] |



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## Question 1: Do you agree with the Workgroup's initial majority view that P339 does better facilitate the Applicable BSC Objectives than the current baseline?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 11 | 1 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | No | We believe that the introduction of new CCC's will better facilitate Objective 'D' improving the reporting available for Measurement Classes E,F and G. The CCC's will make it possible to view each Measurement Class individually rather than on a collective basis splitting out the AI and AE.<br><br>We believe the proposed Scaling Weights do not improve the current baseline under objective 'D' and could result in the allocation of residual energy being less accurate. We believe that the appropriate analysis should be completed to understand what the appropriate Scaling Weights for MC E, F and G would be. We do not believe they should be equal to the NHH counterparts. |
| IMServ Europe | Yes | [None] |
| Npower Group | Yes | Yes, npower supports P339 as we recognise that to be able to split settlement performance by measurement class will be extremely useful to parties in terms of reporting and will definitely enable more suppliers to feel they can switch to elective Half Hourly Settlement (HHS).<br><br>Whilst, we do support the implementation of P339, we would also like to note that this will have a substantial impact/cost on our HHDA system. We will have to ensure the system can send the new CCCs on the D0040 and D0298 flows but also make changes to the backing tables to change the aggregation logic.<br><br>The changes proposed to our Demand Forecasting systems on the other hand are fairly straightforward, where the changes are required to flow loads and tables. |


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| Respondent | Response | Rationale |
|---|---|---|
| OVO Energy | Yes | We agree with the initial majority view of the Workgroup that P339 better facilitates Applicable BSC Objectives (c) and (d) with the reasoning outlined below:<br>• Objective (c) - Elective HH Settlement will open up the potential for innovative new products in the domestic retail market thus increasing competition. This Proposed Modification will remove barriers to an elective HH Settlement market and thus facilitates this BSC objective.<br>• Objective (d) - This Proposed Modification creates the facility for microgeneration sites to be settled without the need for large volumes of site specific HH data to be passed between Parties. |
| Power Data Associates Ltd | Yes | [None] |
| Salient Systems Limited | Yes | [None[ |
| ScottishPower | Yes | ScottishPower believes that BSC Objective (c and d) are better facilitated, as the increased settlement accuracy of microgeneration promotes competition through more efficient and accurate allocation of costs. |
| SmartestEnergy | Yes | The change should facilitate competition as it will facilitate CMP266 (the removal of TNUoS double charging) |
| SP Distribution / SP Manweb | Neutral | We have adopted a neutral stance in that we agree with the minority of the work group view that this modification only creates potential for both competition to improve and microgeneration to be settled more efficiently. This is evidenced by the SRAG report, which identified that unmetered and unregistered export from microgeneration sites are causing an issue with settlement and the Group Correction Factor, however, P339 does not mandate a solution for such sites to ensure that they will register for settlement purposes in the future under elective HH, the modification only provides the potential and facility to do so if parties wish. Therefore it could be argued that a facilitation modification to enhance an elective process, which P339 is, struggles to better facilitate the Applicable BSC Objectives unless its requirements are mandatory. |
| SSE Energy Supply | Yes | [None] |


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| Respondent | Response | Rationale |
|---|---|---|
| Limited | | |
| Stark | Yes | (c) & (d) – could contribute to further demand side response initiatives and encourage inclusion of more micro-generation Customers whilst maintaining Settlement efficiency. |
| TMA Data Management Ltd | Yes | We agree that proposed P339 offers the possibility of differentiated products, increasing the potential for competition and therefore better facilitates Applicable Objective C. |
| UK Power Networks Operations Ltd | Yes | Our view is the Applicable BSC Objectives that are better facilitated by this modification are Objective (c) - Elective HH Settlement opens up the potential for innovative new products in the domestic retail market thus increasing competition. |


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## Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P339?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 11 | 0 | 2 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | [None] |
| IMServ Europe | Yes | [None] |
| Npower Group | Yes | Yes, we agree that the draft legal text delivers the intention of the change. |
| OVO Energy | Yes | The draft legal text is in line with the changes proposed in P339 and includes all the proposed CCCs along with the required 'Measurement Class' column to BSC Section X Annex X-2, table X-8. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |
| SmartestEnergy | No comment | [None] |
| SP Distribution / SP Manweb | Yes | [None] |
| SSE Energy Supply Limited | Yes | [None] |
| Stark | Yes | Nothing applicable. |
| TMA Data Management Ltd | Yes | [None] |
| UK Power Networks Operations Ltd | Yes | Yes we are comfortable that the draft legal text delivers the intent of P339. |


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

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 10 | 1 | 2 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | [None] |
| IMServ Europe | No | An implementation date of 01/04/17 will mean there will be insufficient time for us to fully test and implement this change. In our Impact Assessment response we indicated we would require 6 months lead time once this proposal had been approved. |
| Npower Group | Yes | Yes, npower agrees with the implementation date of 1st April 2017 as P339 is a dependency for CMP266. Not meeting the April 2017 implementation date, would result in measurement class E customers being charged NHH for the 2017/2018 TNUoS charging year. This would adversely impact customers who have the capability and appetite to demand manage during the triad season to reduce system peak and their transmission liability. However, as stated before, the costs and complexity of change to our HHDA system should be noted. |
| OVO Energy | Yes | We agree with the Workgroup's proposed Implementation Date of 1 April 2017. The primary benefit of implementing this proposal by this date is that it removes a potential barrier to the progression of the CUSC modification CMP 266. CMP 266 proposes to remove a key barrier to elective HH Settlement for smaller sites by eradicating the potential for TNUoS to be charged twice for sites who electively settle HH. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | This is in-line with the start of the TNUoS charging year, so would be the most sensible approach. |
| SmartestEnergy | Yes | It is important that this modification is implemented by 1st April 2017 |


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| Respondent | Response | Rationale |
|---|---|---|
| SP Distribution / SP Manweb | Yes | The only comment we would make with regard to the proposed implementation date is that we note in the detailed requirements section of the paper (page 13), that if LDSOs choose to create new LLFC Ids. It should be recognised that the creation of these new LLFC Ids will be subject to the requirements of BSCP128, which depending on the P339 approval date could impact on the proposed implementation date. |
| SSE Energy Supply Limited | [No response] | We accept the rationale for an April 2017 implementation due to the relationship with CMP266. An assessment of this change indicates a six month lead time would be needed from the point a decision has been made to approve. If BSC Panel approve this modification under self-governance arrangements we would have 4.5 months lead time. This is not ideal be we are of the view it can be accommodated if the modification is approved. |
| Stark | Yes | In line with other HH elective processes & migration to HH therefore no reason for delay. |
| TMA Data Management Ltd | Yes | We agree that the benefit of P339 should be available at the same time as CM266, however the changes required for P339 are complex and should be given with as much lead time as possible. |
| UK Power Networks Operations Ltd | Yes | We agree with the proposed implementation date as aligning P339 the start of the TNUoS charging year in line with CMP266 will prevent double charging of TNUoS for an elective HH Settlement meters. |


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## Question 4: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P339 which would better facilitate the Applicable BSC Objectives?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 11 | 1 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | No | We believe alternatives could be:<br><br>- The proposed without introducing new Scaling Weights;<br><br>- Or the proposed but the Scaling Weight values for MC E, F and G should be analysed with HH specific scaling weights for E, F and G being created rather than applying today's NHH values. |
| IMServ Europe | Yes | [None] |
| Npower Group | Yes | Yes, we agree there are no other potential alternative modifications within the scope of P339 which better facilitates the applicable BSC objectives. |
| OVO Energy | Yes | We do not believe that there are any Alternative Modifications that address all the issues that P339 seeks to. One potential alternative was proposed by a member of the Workgroup which would introduce a new Measurement Class for aggregated export under 100 kW without introducing new CCCs but instead using the D0040 'Aggregated Half Hourly Data File' flow to obtain the related consumption data. This modification would not allow different Scaling Weights to be applied Measurement Classes "E", "F" & "G" or the simple implementation of differential performance levels to these Measurement Classes. We agree with the Workgroup view that this alternative should not be progressed. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |


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| Respondent | Response | Rationale |
|---|---|---|
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | Yes | [None] |
| SSE Energy Supply Limited | Yes | [None] |
| Stark | Yes | Introduces an additional level of complexity with a decrease in flexibility. |
| TMA Data Management Ltd | Yes | [None] |
| UK Power Networks Operations Ltd | Yes | We would agree with the workgroups view on this change, which appears to be no other alternatives are available which would better facilitate the BSC objectives. |


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## Question 5: Do you agree with the Workgroup's view that 30 new CCCs should be created?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 11 | 0 | 2 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | [None] |
| IMServ Europe | [No response] | [None] |
| Npower Group | Yes | Yes, whilst we agree in this instance the new CCCs should be created, we will have to ensure the system can send the new CCCs on the relevant flows as well as make changes to the backing tables to change the aggregation logic. |
| OVO Energy | Yes | We agree with the Workgroups view that 30 new CCCs should be created. The new CCCs are required to facilitate the settlement of aggregated export, the application of different Scaling Weights and differential performance levels for Measurement Classes "E", "F" & "G". The introduction of new CCCs has previously been proposed by BSC Modifications P280 and P300. The fact that this modification also includes CCCs for metering system specific line losses for Measurement Classes "E", "F" & "G" ensures that all CCCs which could be required in the future for these Measurement Classes will be created and will prevent the issue of new CCCs from being revisited again at a BSC Workgroup. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | ScottishPower agrees that to avoid a future modification to introduce additional CCCs would be the most sensible approach. |
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | Yes | [None] |
| SSE Energy Supply | Yes | We suggest it would be sensible to create 30 new |


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| Respondent | Response | Rationale |
|---|---|---|
| Limited | | CCCs for completeness. |
| Stark | Yes | As discussed I agree that as changes are being made now it is better to have the extra resource available to increase future efficiency. |
| TMA Data Management Ltd | Yes | It is more efficient to create 30 CCCs to allow for growth and future development without having to raise another modification in the future. |
| UK Power Networks Operations Ltd | Yes | We would agree with this approach and feel that the inclusion of 30 CCCs at this point would future proof this part of the BSC from requiring a further change. |


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## Question 6: Is it beneficial to be able to apply different Scaling Weights for Measurement Classes "E", "F" and "G"?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 1 | 5 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | We believe in principle different Scaling Weights could be applicable to MC E, F and G. We believe that the recording and allocation of energy will be more accurate when it has completed a CoMC to MC E, F or G but we do not think the recording will be as accurate as that in MC C. Due to this we think it could be beneficial to apply a Scaling Weight higher than Zero.<br><br>As the recording and allocation of energy in MC E, F and G will be more accurate than MC A (NHH) we believe that the Scaling Weight should be lower than the NHH Scaling Weights. Any residual error in a GSP group should not be evenly distributed amongst HH and NHH sites. |
| IMServ Europe | [No response] | As a HHDC/DA we hold no view on this. |
| Npower Group | [No response] | Yes, we support applying scaling weights for the measurement classes "E-G", on the assumption that the scaling factors are set to the same level as the existing Non Half-Hourly (NHH) factors. However, if there were changes to the scaling factors that meant they would also need to be applied to HH metered units then this would require a bigger change. |
| OVO Energy | Yes | Ofgem's Elective Half-Hourly Settlement Conclusions Paper identified that allocating 'free' FiT solar spill energy to profiled customers via the application of the GCF represents a cost barrier to transitioning a domestic customer to elective HHS. The focus of this paper was on identifying the barriers to elective HHS for smaller sites (Measurement Classes "F" & "G") and outlining some of the possible solutions. A complete solution to the cost barrier to HHS associated with the application of free solar energy to profiled customers would be for all FiT export sites to be metered and registered for settlement. Such a solution would however take several years to |


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| Respondent | Response | Rationale |
|---|---|---|
| | | complete and would therefore delay the ability of elective HHS to be delivered by Ofgem's target date of 2017. An alternative solution is to apply Scaling Weights to the new CCCs for Measurement Classes "F" & "G" such that customer's in the these groups won't lose out on the 'free' spill energy in moving from profiled to HH settled. Under such a solution the different Scaling Weights applied to the CCCs for Measurement Class "E" customers could remain as they are now meaning that they wouldn't be impacted by this change.<br><br>An additional benefit of this proposal, not necessarily related to HHS, is that this modification will sufficiently distinguish measurement classes E, F and G from one and other. The types of customer in Measurement Classes "E", "F" & "G" can differ markedly and it seems inappropriate that all of these different sites would be required to achieve the same standards with regard to settlement. For example a scaling weight calculated on basis of the characteristics of measurement class "E" sites is unlikely to be appropriate for sites in Measurement Classes "F" or "G". Introducing new CCC's for Measurement Class "F" will therefore allow more accurate scaling weights to be applied to domestic customers, and should ensure that scaling weights are more reflective of differing settlement performance and each customers contribution to profiling error. |
| Power Data Associates Ltd | [No response] | Having the functionality allows for different values to be set in the future. Although my response to Q7 questions the logic of the values. |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |
| SmartestEnergy | Yes | There are clearly different contributions to GSP GCF of domestic and non-domestic. |
| SP Distribution / SP Manweb | No | We do not believe scaling weights should be applied to Measurement Classes E, F and G as these customers are deemed to have elected to be treated as HH and as such 'accurate' consumption information for both import and export will be available from the meter. |
| SSE Energy Supply Limited | Yes | [None] |


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| Respondent | Response | Rationale |
|---|---|---|
| Stark | [No response] | [None] |
| TMA Data Management Ltd | [No response] | [None] |
| UK Power Networks Operations Ltd | Yes | We believe that scaling weights are appropriate to be different across the three Measurement Classes, (E, F & G). |


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## Question 7: Do you agree with the proposed values of the Scaling Weights for Measurement Classes "E", "F" and "G"?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 4 | 2 | |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | No | As highlighted in Q.6 we believe the Scaling Weights for E, F and G should be lower than the NHH counterparts based on the rationale that the consumption will be more accurately recorded at HH sites than NHH sites.<br><br>The HH recorded consumption will be more accurate we do not believe that it is an accurate reflection of the error in a GSP to allocate the same proportion of residual energy to both NHH and HH sites. |
| IMServ Europe | [No response] | As a HHDC/DA we hold no view on this. |
| Npower Group | Yes | Yes, we agree with the proposed values for the scaling weights for the measurement classes as our main concern is around if the application of GSF changes. |
| OVO Energy | Yes | This Modification was raised to help remove the barriers to elective HHS for smaller sites in Measurement Classes "F" & "G". In order to remove the barrier originating from 'free' FiT spill energy mentioned previously the Scaling Weights for Measurement Classes "F" & "G" should match those applied to profiled customers as has been proposed by the Workgroup. The Scaling Weights applied to Measurement Class "E" CCCs would not change from their current values of 0 therefore not impacting customers already being settled in this customer group. |
| Power Data Associates Ltd | No | The logic of the values is not clear. There are existing customers on MC C or E with no scaling factor and then this change would apply a scaling factor to E, F & G. The reasoning for adding a scaling factor is not clear, particularly for E which would change. I see no reason to disadvantage suppliers/customers settling on actual HH data for other settlement 'errors' primarily in the NHH |


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| Respondent | Response | Rationale |
|---|---|---|
| | | profiling calculation. |
| Salient Systems Limited | Yes | Consensus upon proposed scaling weights may not raise any initial concerns.<br><br>However, commitment to and clarity upon a more rigorous, ongoing, periodic and formal SW integrity testing and proving regime may be required to assure integrity over time. |
| ScottishPower | No | Having different scaling weights provides a mechanism for ensuring settlement accuracy however without seeing the analysis to determine these values it is not possible to say whether the values suggested, 0 for MC E and 1 for MC F & G are appropriate. Current MC has a scaling weight of 0 so without any analysis to confirm otherwise it is not clear why should MC F & G be treated differently. |
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | No | As per our response to Q6, given that the customers in the three measurement classes are deemed to be HH and as such 'accurate' HH consumption data is being obtained from the meter we do not believe that scaling weights should be applied. |
| SSE Energy Supply Limited | Yes | The Scaling Weights appear to be reasonable, though these may need to be revisited at a later date. |
| Stark | Yes | Seems practical to align with NHH at this stage. |
| TMA Data Management Ltd | [No response] | [None] |
| UK Power Networks Operations Ltd | Yes | [None] |


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## Question 8: Do you agree that Consumption Level Indicators are not required in MDD at this time?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 11 | 0 | 2 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | [None] |
| IMServ Europe | [No response] | As a HHDC/DA we hold no view on this since further development work to support this is minimal, should we choose to process MDD updates automatically. |
| Npower Group | Yes | Yes, npower agrees that the Consumption Level Indicators are not required in MDD at this time as it would likely require further changes to our systems. |
| OVO Energy | Yes | We agree with the Workgroup's view that the introduction of Consumption Level Indicators to the MDD would significantly add to the implementation impact of this modification and is not necessary. In the absence of introducing Consumption Level Indicators to the MDD BSC Parties will be in the situation they are now where BSC Section X Annex X-2, table X-8 is used to link CCCs to Measurement Class. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | Yes | We agree with the workgroup rationale re the cost of implementing such a change at this time. |
| SSE Energy Supply Limited | Yes | [None] |
| Stark | Yes | If this would result in further impacts & costs, resulting in potential delays then should be reviewed later. |
| TMA Data Management Ltd | Yes | It would complicate the changes required for P339 and would likely compromise the ability of some parties to meet the preferred implementation date |


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| Respondent | Response | Rationale |
|---|---|---|
| | | of 01/04/2017. |
| UK Power Networks Operations Ltd | Yes | Inclusion of the Consumption Level Indicators (CLIs) in MDD would require significant changes to industry systems and as a result we would strongly support the approach not include these into MDD. |


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## Question 9: Will your organisation be impacted by the addition of 'Measurement Class Indicator'?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 5 | 7 | 1 | |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | No | We haven't identified an impact through the addition of Measurement Class Indicator. Our understanding from the legal text is that the MDD CCC table format would remain unchanged so we would not anticipate any impacts from this. |
| IMServ Europe | Yes | We welcome the additional clarity this brings. |
| Npower Group | Yes | Yes, our organisation will be impacted by this addition. However, this would require changes to the flow load and table for our systems, and should be fairly straightforward. |
| OVO Energy | No | The addition of 'Measurement Class Indicator' will help link CCCs to Measurement Class using table X-2 but the overall impact on the organisation will be negligible. |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | We will be beneficially impacted by the addition of MC indicator at reference data that will be used to apply data driven changes to HHDA system. |
| ScottishPower | No | The introduction of this additional field will require minor changes to multiple systems to accommodate. Whilst the use of the Consumption Level Indicator field is referenced as an option in the report, it is not clear why the introduction of a new field is the preferred option. The use of an existing field would reduce the level of change required. |
| SmartestEnergy | No | [None] |
| SP Distribution / SP Manweb | No | Given that the proposal is only to update Section X, Annex X-2 of the BSC, then there would appear to be no impact on our organisation. |
| SSE Energy Supply | Yes | Minor system changes will be required for our |


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| Respondent | Response | Rationale |
|---|---|---|
| Limited | | settlement systems. |
| Stark | No | This is seen as a minor addition to the changes already being made. |
| TMA Data Management Ltd | No | [None] |
| UK Power Networks Operations Ltd | Yes | We do not believe that we will be materially impacted by P339. We will assess nearer the time whether UKPN need to create new Line Loss Factors |


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## Question 10: Do you agree with the Workgroup's unanimous view that P339 should proceed as a Self-Governance Modification Proposal?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 12 | 0 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Yes | We do not think that the proposed changes would have a material enough impact on the Self-Governance criteria. |
| IMServ Europe | Yes | [None] |
| Npower Group | Yes | Yes, npower agrees that P339 proceeds as a self-governance modification. |
| OVO Energy | Yes | [None] |
| Power Data Associates Ltd | [No response] | [None] |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | Yes | [None] |
| SSE Energy Supply Limited | Yes | We do not see that this modification will have a material impact on industry or customer arrangements. |
| Stark | Yes | Appears to fulfil criteria. |
| TMA Data Management Ltd | Yes | [None] |
| UK Power Networks Operations Ltd | Yes | Yes we would agree with this view and it does not require Authority consent |


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## Question 11: Do you agree with the Workgroup's view that the P339 solution is aligned with Ofgem's recommendations on HH Settlement?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 9 | 1 | 2 | 1 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| British Gas Ltd | Other | The intention of P339 was to introduce new CCC's in MC E, F and G to allow further modifications to address potential barriers to HH Settlement such as change to the BSC Specified Charges (P346) and Performance requirements (P347).<br><br>As P346 and P347 have been progressed the respective solution are not reliant on P339 introducing new CCC's to be implemented. P346 no longer needs to differentiate between Measurement Class P347 would implement the required CCC's would be implemented as part of the solution.<br><br>We believe that the CCC's proposed will be beneficial in allowing parties to identify AI and AE for the respective MC's. The other aspect that P339 looks to introduce is the Scaling Weight values to Measurement Class E, F and G. As previously stated we do not believe the values proposed are correct but believe that a Scaling Weight of more than Zero would be appropriate for these sites. If the proposal was to address this then we believe that the proposal would align with Ofgems recommendations. |
| IMServ Europe | Yes | [None] |
| Npower Group | Yes | Yes, P339 is aligned with Ofgem's recommendations on elective HHS. |
| OVO Energy | Yes | We believe the P339 solution is aligned to Ofgem's recommendations on HH Settlement and also key to implementing the following changes that Ofgem recommended to facilitate an elective HH market in their HHS conclusions paper:<br><br>• Removal of FiT spill barrier through the application of the GCF to Measurement Classes "F" & "G" which is treated by this modification.<br><br>• Application of differential meter read |


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| Respondent | Response | Rationale |
|---|---|---|
| | | performance targets for Measurement Classes "F" & "G" which is currently being addressed by BSC Modification P347.<br>• Overcharging of transmission charges which is being addressed by CUSC Modification CMP 266. |
| Power Data Associates Ltd | [No response] | When FiTs was introduced (many years ago) the export consumption was always intended to be metered, however at that time the assumption was that smart metering would happen shortly after FiTs introduction. Smart implementation has taken many more years. |
| Salient Systems Limited | Yes | [None] |
| ScottishPower | Yes | Agree |
| SmartestEnergy | Yes | [None] |
| SP Distribution / SP Manweb | Yes | [None] |
| SSE Energy Supply Limited | Neutral | We view this as an 'enabling' modification, which will help to build arrangements that are necessary to moving towards a more cost-efficient HH settlement arrangement for smart meters. We do not believe this modification as a stand alone solution brings many immediate benefits but related and/or future modifications are likely to, e.g. the application of different Performance Levels and BSC specified charges to MC E-G. |
| Stark | Yes | It will help enable elective HH for the smaller sites |
| TMA Data Management Ltd | Yes | [None] |
| UK Power Networks Operations Ltd | No | Yes, the implementation of P339 is vital to address issues of double counting under the TNUoS charging arrangements |


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## Question 12: Do you have any further comments on P339?

### Summary

| Yes | No |
|---|---|
| 2 | 11 |

### Responses

| Respondent | Response | Comments |
|---|---|---|
| British Gas Ltd | No | [None] |
| IMServ Europe | No | [None] |
| Npower Group | No | [None] |
| OVO Energy | Yes | The primary benefit of P339 is that it will remove a significant cost barrier to elective HHS. Once elective HHS is possible, we expect that domestic customers will be provided with more choice and innovation in the domestic retail electricity market. We are also optimistic that HHS will enable the introduction of further products that will not only reduce consumer bills, but contribute to system security and the achievement of renewable targets. |
| Power Data Associates Ltd | Yes | The text "unmetered and unregistered" used in the document should read "unmetered and/or unregistered". There are a number of export sites where the export energy is metered by an existing HH capable meter but there is not an export MPAN registered. As a result the export consumption although metered the consumption does not enter settlement. Introducing the new measurement classes will make it easier for this to be settled. |
| Salient Systems Limited | No | [None] |
| ScottishPower | No | [None] |
| SmartestEnergy | No | [None] |
| SP Distribution / SP Manweb | No | [None] |
| SSE Energy Supply Limited | No | [None] |
| Stark | No | [None] |
| TMA Data Management Ltd | No | [None] |


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| Respondent | Response | Comments |
|---|---|---|
| UK Power Networks Operations Ltd | No | [None] |


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# Appendix 1: Additional Response

An additional response from Electricity North West was received. It stated the following:

"Electricity North West has reviewed the P339 Consultation "Introduction of new Consumption Component Classes for Measurement Classes E-G"

We can confirm that we are happy with the legal drafting and proposals, and do not believe that these will be an issue for the company.

We are fully supportive of Elexon's work on the movement toward enabling half hourly settlements."


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