

## Change Proposal Circular

### CPC00701: Impact Assessment of CP1352, CP1353 and CP1354

#### Responses for CP1352 'Remove option of postal FAA invoices'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Trade association representing Meter Operators	-	-	-
CE Electric UK (NEDL & YEDL)	LDSO	Neutral	No	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	No	-
IBM (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-
Imserv	HHDC/DA/MO, NHHDC/DA/MO	-	-	-
Lowri Beck Services Ltd	NHHMO/NHHDC/NHHDA	Neutral	No	-
npower	Supplier & Supplier Agents	Yes	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDA, NHHDC	Neutral	No	-



#### Any Questions

If you have any queries, please contact:

[CCC@elxon.co.uk](mailto:CCC@elxon.co.uk)

Or contact:

**BSCP40 Change  
Process Task Leader  
020 7380 1435**

Summary of Responses				
Wessex Water Energy Group	2,500 electricity supplies	-	-	-

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	-	-	-
CE Electric UK (NEDL & YEDL)	Neutral	No	-
EDF Energy	Yes	No	-
IBM (for and on behalf of Scottish Power)	Yes	No	-
Imserv	-	-	-
Lowri Beck Services Ltd	Neutral	No	-
npower	Yes	No	-
TMA Data Management Ltd	Neutral	No	-
Wessex Water Energy Group	-	-	-

## Responses for CP1353 'Including the ECOES Meter Information flow (D0312) in BSCP514'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Trade Association representing Meter Operators	-	-	-
npower	Supplier & Supplier Agents	Yes	No	-
CE Electric UK (NEDL & YEDL)	LDSO	Yes	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	Yes	30
IBM (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-
Imserv	HHDC/DA/MO, NHHDC/DA/MO	Yes	Yes	-
Lowri Beck Services Ltd	NHHMO/NHHDC/NHHDA	Yes	Yes	60
TMA Data Management Ltd	HHDC, HHDA, NHHDA, NHHDC	Yes	No	-
Wessex Water Energy Group	2,500 electricity supplies	Yes	No	-

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	-	-	-
CE Electric UK (NEDL & YEDL)	Yes	Yes	<p><b>Agree change comment –</b> Yes – We agree with this change on the basis that it improves accuracy.....</p> <p><b>For which role is your organisation impacted?</b> LDSO (with interest in Legacy Metering Equipment)</p> <p><b>Please state what the impact is:</b> Although we are not directly impacted we feel this benefits data accuracy. We also own and maintain the information used to populate ECOES so we have an interest in this change from this perspective.</p> <p><b>Lead time comment –</b> No system amendments required</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact</p>
EDF Energy	Yes	Yes	<p><b>Agree change comment –</b> Yes</p> <p><b>For which role is your organisation impacted?</b> MOP</p> <p><b>Please state what the impact is –</b> Ensure process is fully embedded as Business as Usual</p> <p><b>Lead time comment</b> Mainly to update documentation and ensure training on flow is re-emphasised.</p> <p><b>Do you have any other comments?</b> Although we support this change we do not feel that what we have in industry is sufficient. Main problem seems to be with keeping metering data up to date on ECOES. We feel that obligation should be extended to not only send a D0312 but also to manage any rejections to ensure that the data in ECOES is current? We believe one of main failings of is that BSCPs focus almost</p>

Detailed Impact Assessment Responses			
			entirely on timeliness of sending data but not on quality. Sending a flow on time that fails to process is no better than sending nothing at all. Perhaps as we move forward we might want to consider this for future similar changes.
IBM (for and on behalf of Scottish Power)	Yes	No	-
Imserv	Yes	Yes	<p><b>Agree change comment –</b> Already doing this</p> <p><b>For which role is your organisation impacted?</b> HHMO, NHHMO</p> <p><b>Please state what the impact is –</b> We need to send a new D0312 in all cases where any of the data items within it have changed</p> <p><b>Lead time comment</b> We already do this so no impact</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment –</b> None</p>
Lowri Beck Services Ltd	Yes	Yes	<p><b>Agree change comment –</b> Yes - Even though BSCP514 does not state when the D0312 should be sent, LBSL MOA currently sends D0312 to ECOES when MTDS are sent. This is to ensure ECOES is kept in line with the data in the MTDS being sent out to other parties.</p> <p><b>For which role is your organisation impacted?</b> NHHMO</p> <p><b>Please state what the impact is –</b> LBSL MOA currently sends D0312 to ECOES when MTDS are sent to other parties. This is to ensure ECOES is kept in line with the data in the MTDS being sent out and would cover any data changes. However this change would impact us if we are to ONLY send D0312 for the scenarios listed in the CP. We have been working on the assumption that when the new MOP receives the</p>

Detailed Impact Assessment Responses			
			<p>MTDS for the first time, the new MOP cannot determine if there has been a data change at that point, so sends the flow out just in case. If the data was identical to what ECOES already has then no harm done; if it is different then we are assuming that the old MOP hadn't provided ECOES with the update prior to sending the data on.</p> <p>We would like some clarification as to whether the scenarios listed are the ONLY points where a D0312 should be sent. Should we stop sending the D0312 at the time of a CoS from now on and assume that the old MOP has updated ECOES accordingly?</p> <p><b>Lead time comment –</b> 60 days - We rely on a 3rd party supplier for the MOA software. We would need a versioned change document for them to act. The change would then need to be tested both by the 3rd party and then by ourselves.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact</p> <p><b>Do you have any other comments –</b> We would like some clarification as to whether the scenarios listed are the ONLY points where a D0312 should be sent. Should we stop sending the D0312 at the time of a CoS from now on and assume that the old MOP has updated ECOES accordingly?</p>
npower	Yes	No	<p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No impact</p>
TMA Data Management Ltd	Yes	No	-
Wessex Water Energy Group	Yes	No	<p><b>Agree change comment –</b> My colleagues and I work in Wessex Water's Energy Group managing ~2,500 electricity supplies. We find the information held in ECOES extremely useful and welcome any proposals that will improve its accuracy and utility.</p> <p><b>Any other comments -</b> Gleen Sheern's proposal to help improve ECOES data quality receives our support and we look forward to seeing this improvement implemented.</p>

## Responses for CP1354 'Clarifying commissioning requirements of BSCP537 Qualification Appendix 1: Self Assessment Document (SAD)'

Summary of Responses				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Trade association representing Meter Operators	Yes	No	-
npower	Supplier & Supplier Agents	No	Yes	
CE Electric UK (NEDL & YEDL)	LDSO	Yes	Yes	-
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	No	-
IBM (for and on behalf of Scottish Power)	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. ScottishPower Manweb plc. ScottishPower Distribution Ltd.	Yes	No	-
Imserv	HHDC/DA/MO, NHHDC/DA/MO	-	-	-
Lowri Beck Services Ltd	NHHMO/NHHDC/NHHDA	Neutral	No	-
TMA Data Management Ltd	HHDC, HHDA, NHHDA, NHHDC	Yes	No	-

Summary of Responses				
Wessex Water Energy Group	2,500 electricity supplies	-	-	-

Detailed Impact Assessment Responses			
Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	Yes	-	<p><b>Agree change comment – Yes</b> Support the basis of the change, but do not agreed with the provocative text about reduction of skills within the Metering workforce. Also the provocative text that the cause of the errors, some of which are caused by CT/VT information being incorrect/unknown stated/provided by the LDSO and no fault of the MO.</p> <p>Would suggest that similar changes need to be included into the SAD for LDSO. The LDSO is virtually always the Equipment Owner of the CT/VT equipment which is an essential part of the Metering Equipment and upon which the Meter Operator is dependent. A recent MOCOPA® change has made the LDSO always responsible for the CT/VT equipment, which in part of the BSC definition of Metering Equipment.</p>
CE Electric UK (NEDL & YEDL)	Yes	Yes	<p><b>Agree change comment – Yes</b> We as an LDSO are affected by data inaccuracies in settlements caused by inaccurate meter commissioning with impacts on our losses incentive. We welcome any proposal that assists individuals applying to be qualified BSC meter operator agents to understand the full requirements of meter commissioning and the importance of proper communication with the LDSO and/or equipments owner.</p> <p><b>For which role is your organisation impacted?</b> LDSO</p> <p><b>Please state what the impact is –</b> This proposal could potentially help to reduce the amount of missing, inaccurate or incomplete</p>



Detailed Impact Assessment Responses			
			<p>meter commissioning data which could improve the accuracy of settlements. More accurate settlements would have positive impact on LDSOs since they have an incentive to reduce losses in their price control mechanisms. Asking meter operator agents to specify the contacts and communication lines with the equipment owner and to specify their controls for assessing the quality of commissioning results should further emphasise the importance of meter commissioning before the agents are permitted to work on the system.</p> <p><b>Lead time comment –</b> We would not need any notice to implement this change</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact anticipated</p> <p><b>Associated costs comment</b> No associated costs on our organisation to implement the change</p> <p><b>Any other comments –</b> We note the good work that the TAMEG has done on meter commissioning and we believe that this proposal further highlights the importance of quality meter commissioning for all BSC parties.</p>
EDF Energy	Yes	No	-
IBM (for and on behalf of Scottish Power)	Yes	No	-
Imserv	-	-	-
Lowri Beck Services Ltd	Neutral	No	-
npower	No	Yes	<p><b>For which role is your organisation impacted?</b> Mop</p> <p><b>Please state what the impact is –</b> We believe that this change would make MOps responsible for parts of the metering system which are currently the responsibility of the LDSO. This could mean additional process/training</p>

Detailed Impact Assessment Responses			
			<p>change on our part as well as additional financial costs. This change seems to indicate that the LDSOs are trying to push the responsibility onto the MOP. The MOP would not be able to do an end to end commission on the vast majority of the sites. As they will be unable to access the equipment to complete the commission (e.g. HV switchgear or air circuit breakers).</p> <p>In the Yorkshire and Northern areas the MOP fits the metering panel on behalf of the DNO and even then the commission may not always be possible.</p> <p>Our view is that LDSO should be responsible for commissioning the metering panel, CT's and VT's as this equipment is theirs. The MOP would then carry out a commission on the metering. The complete commission (panel and meter) should then be owned by the MOP as it is the MOP who are responsible for the system as a whole. There should be a mechanism for the MOP to obtain all the relevant information from the DNO.'</p> <p><b>Lead time comment</b> Not known</p>
TMA Data Management Ltd	Yes	No	-
Wessex Water Energy Group	-	-	-

Comments on the redline text for CP1354					
No.	Organisation	Document name	Location	Severity Code	Comments
1	IBM (for and on behalf of Scottish Power)	BSCP537 Appendix 1	13.1.3 14.1.3	L	In 13.1.3, 'including commission records' is inserted. In 14.1.3, 'including commissioning records' is inserted. We would recommend that either one insertion or the other is used for both clauses to ensure clarification and consistency.