

## CPC00650 – Impact Assessment Responses for DCP0039, CP1265, CP1266 and CP1267

### DCP0039 - Supplier Agents - Access to Meter Protocols

#### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	30
IMServ Europe	HH and NHH DC, HH and NHHDA, HH and NHHMO	Yes	0
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	60
NPower Limited	Supplier, Supplier Agents	Yes	180
TMA Data Management Ltd	HHDC, HHDA and NHHDA	Yes	30
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	30
E.ON	Supplier	Yes	-
Electricity North West Ltd	LDSO	Yes	0
Stark Software International	HHDC/HHDA/NHHDR	Yes	0
British Energy	Supplier; Generator; Trader; CVA MOA	Yes	-
AccuRead	NHHDC / NHHDA / NHHNOA / HHMOA	Neutral	-
CE ELECTRIC	LDSO, UMSO	Neutral	-
E.ON UK Energy Services Limited	NHHDC-DA NHHMO HHMO	Neutral	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	-

#### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
EDF Energy	Yes	<p><b>Impact on Organisation:</b> Process will be required to determine how this information is passed. It would be of use if these protocols could be maintained in a central repository so that changes and details can be kept up to date.</p> <p><b>Implementation:</b> 30 WD: Difficult to determine actual requirement. This depends on how this information is made available and how changes to that information are managed.</p>	yes

<b>IMServ Europe</b>	Yes	<p><b>Comments:</b> We fully support the objective of this CP and would endorse any changes to ensure the availability of the information in question. Whilst appreciative that revised wording for BSCP601 has not yet been considered, we would recommend that this is written in such a way as to place an obligation on the Supplier to provide this to the Agent if requested which will ensure that the objective of "interoperability" is fully achieved.</p> <p><b>Impact on Organisation:</b> Unable to comment until the solution is further defined.</p>	No
<b>Scottish Power</b>	Yes	<p><b>Comments:</b> Anything other than the manufacturers making the protocols available could have serious implications for the competitiveness of the sector. Also, and possibly more importantly, the availability of these protocols is essential if the roll out of advanced metering to PC 5-8 and ultimately to the wider sector by 2020 is to be successful. This DCP, if progressed to CP, should successfully remove a potentially major obstacle to a smooth roll out and operation of advanced metering in the UK.</p>	yes
<b>NPower Limited</b>	Yes	<p><b>Comments:</b> The standard definition of 'protocols' does not necessarily cover the Manufacture's software that is required in order to access their meters. In particular to allow MOPs to reconfigure the meter remotely. This should therefore be considered for inclusion into this definition at this stage.</p> <p>Compliance testing should include the step that states whether or not a meter is capable of being remotely reconfigured. The results should be captured on the List of Approved meters, further consideration of other criteria may be required.</p> <p>Support in principle but would need to see 'worked' solution drafting.</p> <p><b>Impact:</b> Process changes. Possible system changes.</p> <p><b>Implementation:</b> 180 Dependent upon 'worked' solution</p>	Yes
<b>TMA Data Management Ltd</b>	Yes	<p><b>Comments:</b> Strongly favour the change as we believe it supports the aims of the BSC inasmuch as the proposal supports the effective working of the market and reduces risks to Settlements</p> <p>Impact: NHHDC (qualification in progress) Process</p> <p><b>Implementation:</b> Is there any reason why the protocol could not be circulated to all relevant qualified agents directly, subject to non disclosure agreements, once the protocol has been developed and tested?</p>	Yes
<b>Scottish and Southern Energy</b>	Yes	<p><b>Comments:</b> How will the meter manufacturers communicate the protocols to the suppliers and the suppliers to the party agents?</p> <p><b>Impact:</b> New processes in place</p>	Yes

<b>Electricity North West Ltd</b>	Yes	<p><b>Comments:</b> Although there is no direct impact on Systems or Processes, we would be adversely affected by not receiving meter readings to calculate DUoS bills if this CP was rejected.</p> <p><b>Impact:</b> Improved Data Quality</p> <p><b>Implementation:</b> No system and process impacts</p>	No
<b>Stark Software International</b>	Yes	<p><b>Comment:</b> This will facilitate competition through the industry.</p> <p><b>Impact:</b> Adoption of new protocols if resired.</p> <p><b>Other Comments:</b> In its current form the DCP is not clear what the status is of existing HH metering protocols that might be used in the new NHH 5-8 AMR market and whether the requirement is retrospective.</p>	Yes

**CP1265 - Technical Assurance Documentation Changes Following Review**

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
NPower Limited	Supplier, Supplier Agents	Yes	-
TMA Data Management Ltd	HHDC, HHDA and NHHDA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
E.ON UK Energy Services Limited	NHHDC-DA NHHMO HHMO	Yes	-
Western Power Distribution	Distributor & MOA	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Ltd	LDSO	Yes	0
British Energy	Supplier; Generator; Trader; CVA MOA	Yes	-
AccuRead	NHHDC / NHHDA / NHHNOA / HHMOA	Neutral	
CE ELECTRIC	LDSO, UMSO	Neutral	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Scottish Power	Yes	<b>Impact:</b> Documentation Changes Only	yes
TMA Data Management Ltd	Yes	<b>Comments:</b> There is no impact on TMA's systems or procedures as the changes proposed reflect the existing processes in place, introduced by the new TAA agent C&C in 2007.	
E.ON UK Energy Services Limited	Yes	<b>Comments:</b> The changes identified will not have a significant impact on our activities as the changes reflect current practice.	No

<b>Electricity North West Ltd</b>	Yes	<b>Impact:</b> Housekeeping Change – no direct impact on Systems and Processes <b>Implementation:</b> No system and process impacts	No
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Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/C oPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	NPower Limited	Attachment A	Section 1.15 3.1.4		BSCP27 now references Performance Assurance Parties and seems to suggest that the LDSO may be responsible for some of the rectification - is this the case, how will this work in practice, and will it now be possible for the TAA to raise a NC against a LDSO?
2	TMA Data Management Ltd	SVA TAA Service Description	3.1.4	L	Replace notificationd by notification
3	TMA Data Management Ltd	CVA TAA Service Description	3.1.5	L	Replace notificationd by notification

## CP1266 - Updates and Refinements to BSCP504

### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
NPower Limited	Supplier, Supplier Agents	Yes	-
TMA Data Management Ltd	HHDC, HHDA and NHHDA	Yes	30
AccuRead	NHHDC / NHHDA / NHHNOA / HHMOA	Yes	-
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	-
E.ON UK Energy Services Limited	NHHDC-DA NHHMO HHMO	Yes	-
E.ON	Supplier	Yes	-
Electricity North West Ltd	LDSO	Yes	0
British Energy	Supplier; Generator; Trader; CVA MOA	No	-
CE ELECTRIC	LDSO, UMSO	Neutral	-
Independent Power Networks Limited	LDSO, UMSO, SMRA	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Scottish Power	Yes	<b>Impact:</b> Documentation Changes Only	Yes
TMA Data Management Ltd	Yes	These corrections are welcome to improve the clarity of BSCP504 <b>Impact:</b> Process	Yes
E.ON UK Energy Services Limited	Yes	<b>Comments:</b> The changes identified will not have a significant impact on our activities as the changes reflect current practice.	No
E.ON	Yes	<b>Comment:</b> The only issue E.ON can see is in relation to Section 3.3.1 where in a number of	No

		<p>places it states, "Refer to section 3.3.11 Calculate AA/EAC Values and send to NHHDA and Supplier." Yet there is no NHHDA or Supplier in the 'To' column and no mention of the D0019 flow.</p> <p>It obviously does refer to Section 3.3.11, but we think it loses a bit of context here as you have to dig around to fully follow the process. It could include the key elements above and also refer to 3.3.11 for the full process.</p>	
<b>Electricity North West Ltd</b>	Yes	<p><b>Impact:</b> Improved Documentation</p> <p><b>Implementation:</b> Housekeeping change only</p>	No
<b>British Energy</b>	No	<p><b>Comment:</b> Agree apart from amendments suggested in point three, further justification would be required as to why these amendments are necessary</p>	No

## CP1267 – Registration of UMSO's and MA's in SMRS

### Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
Scottish Power	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	120
TMA Data Management Ltd	HHDC, HHDA and NHHDA	Yes	-
AccuRead	NHHDC / NHHDA / NHHNOA / HHMOA	Yes	-
E.ON	Supplier	Yes	-
British Energy	Supplier; Generator; Trader; CVA MOA	Accept	-
NPower Limited	Supplier, Supplier Agents	No	-
CE ELECTRIC	LDSO, UMSO	No	180
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	No	60-180
Western Power Distribution	Distributor & MOA	No	180
Electricity North West Ltd	LDSO	No	>365
Independent Power Networks Limited	LDSO, UMSO, SMRA	No	-
E.ON UK Energy Services Limited	NHHDC-DA NHHMO HHMO	Neutral	-

### Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
Scottish Power	Yes	<p><b>Comments:</b> ScottishPower supports the change to the validation rules for both UMSO and MA. The change would seem the logical response to prevent a re-occurrence of the current problems affecting the SWAE GSP.</p> <p><b>Impact on Organisation:</b> System and process changes</p> <p><b>Implementation:</b> There will be system changes required to implement such a change. However, we would support the June '09 release date as being sufficient time to make all necessary changes to our systems</p>	Yes
British Energy	Accept	<p><b>Comment:</b> Accept CP however, it is important to consider what impacts / changes would be required as a result in terms of updating MPAS with the appointed UMSO.</p>	-



<b>NPower Limited</b>	No	<b>Comments:</b> The validation rule change for MPAS (Red Lines) We can't quite see how MPAS are going to know whether a MOA is being appointed as a meter operator or an UMSO. Unless the validation rules are changed to the Participant Role code is validated against the Measurement Class. Even then how does MPAS know which Role Code is being applied, "M" for MOA or "3" for UMSO or "4" for Meter Administrator?	Yes
<b>CE ELECTRIC</b>	No	<b>Comment:</b> We reject this change proposal as feel the benefits are outweighed by the financial implications. <b>Impact on Organisation:</b> Validation rule changes would be required to the MPAS system to incorporate the changes outlined in this proposal this would incur costs. <b>Implementation</b> If implemented we would require 6 months to incorporate system changes. <b>Would implementation in the proposed Release have an adverse impact? (please state impact)</b> No adverse changes identified but please refer to comments above.	Yes
<b>Scottish and Southern Energy</b>	No	<b>Comments:</b> We agree that the current operational issues need to be addressed. However, it appears from the discussions that have been taking place elsewhere in the industry that there may be other options available e.g., creating a dummy UMSO/MA MoP. Perhaps these could be explored before this change is progressed further, especially in view of St Clements' estimate of 7.5k-10k to reinstate the processing of role codes 3 and 4 in MPRS. <b>Impact:</b> Changes to MPRS systems and process change	Yes
<b>Western Power Distribution</b>	No	<b>Comments:</b> This is a significant change to the SMRS system to address what we consider to be a minor issue. We would prefer to see documentation changes to reflect the fact that the UMSO and MA are not maintained on SMRS, and that the identity of the "MOA" shown on MPAS for unmetered supplies is irrelevant. The BSCPs should instruct Suppliers to register UMS MPANs using any valid MOA MPID so that the D0055 or D0205 can be accepted. The justification for this CP seems to be all about compliance with BSCPs rather than solving a particular market issue. Is there actually a problem that anyone other than Elexon, presumably for BSC compliance purposes, needs to be solved? Does anyone actually need to look on SMRS to find out who the UMSO or MA is? (The UMSO is always the LDSO so this can not be an issue for NHH MPANs and, for HH MPANs, the UMSO and Supplier are normally told who the MA is by the customer so we are not convinced it is a problem for HH MPANS either.) <b>Impact:</b> Significant system change	Yes
<b>Electricity North West</b>	No	<b>Comment:</b> This seems to be an unnecessarily unwieldy and expensive change for very little benefit. See	Yes

Ltd		<p>below for alternative suggestion.</p> <p><b>Impact:</b> System and Process Changes</p> <p><b>Implementation:</b> To make this change to MPRS would mean that all MPAS Agents would have to migrate to the same release version. As there are at least 3, perhaps 4, different versions of MPRS in existence at this moment, the affected MPAS agents would need time to progress through to the latest one.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b></p> <p>Yes – most MPAS agents would be unable to comply with the change in this time period – see answer above.</p> <p><b>Other Comments:</b> A simpler change would be to create a dummy unmetered MOP in MDD (perhaps using UMSO as the MDID). As MPRS does not send flows to MOP, this would have no impact on dataflows being sent to parties incorrectly, but would allow Suppliers to “appoint” a MOP with the minimum disruption to all concerned.</p>	
Independent Power Networks Limited	No	<p><b>Comment:</b> As an UMSO that is not an MOA, we agree that there is an issue in the industry at present. However, we have concerns over whether the proposed solution is the most cost effective for the industry as a whole. In light of this, we would therefore recommend that the following options are explored:</p> <ul style="list-style-type: none"> <li>• the Supplier should choose an appropriate MOp, which could be any MOp.</li> <li>• create a dummy MOp for unmetered supplies, i.e UMSO.</li> </ul> <p><b>Implementation:</b> Though there is no internal systems or process changes involved, there would be an industry cost of around £7.5-10k to implement this proposal.</p>	No

Comments on redline text

No.	Organisation	Document name (e.g. BSCPXXXX/CoPX)	Location (Section and paragraph numbers)	Severity Code (H/M/L – see below)	Comments by Reviewer
1	Npower		Section 1.3.8		What does "nominate" actually mean and how would this be achieved, outside of the SMRS agent appointment process? Currently MPAS will not accept a Meter Administrator role.