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| Meeting name | Supplier Volume Allocation Group (SVG) |
| Date of meeting | 29 September 2009 |
| Paper title | Change Proposal Progression |
| Purpose of paper | For Decision |
| Synopsis | <p>This paper provides:</p> <ul style="list-style-type: none">• 6 Change Proposals (CP1267, CP1304, CP1305, CP1306, CP1307 and CP1308) for decision;• the 2009-2010 Change Proposal Impact Assessment Timetable for approval;• an update on the re-baselining of the approved redlined text of CP1290 and CP1291 against the latest conformed version of BSCP520;• an update on amendments to P223 approved redlining (Profile Administrator Service Description Formatting); and• details of all Open Draft Change Proposals (DCPs) and Change Proposals (CPs). |

1 Introduction

- 1.1 This paper provides the details of 6 CPs for you to consider and agree on their progression.
- 1.2 ELEXON issued CP1304, CP1305, CP1306, CP1307 and CP1308 for Party/Party Agent Impact Assessment via Change Proposal Circular (CPC) 00667. In light of this assessment, we invite the SVG to decide whether to approve or reject these CPs.
- 1.3 Last month, you deferred a decision on CP1267, asking us to look at whether a manual solution was viable. We have looked into the manual option, and provide an update within this paper. We invite you to decide whether to approve or reject the CP.

2 Summary of Change Proposals for progression

- 2.1 Long Term Vacant Site Change Proposals (CP1304 – CP1308)
- 2.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process'¹. The primary objective of the group was to review the processes implemented by P196 'Treatment of Long Term Vacant Sites in Settlement'².
- 2.1.2 The issue 0004 group discussed issues with the LTV processes, which have been identified through:
- targeted Technical Assurance checks (carried out in November and December 2007);
 - the 2007/2008 BSC Audit; and
 - by Suppliers and Supplier Agents who have already implemented and are operating the LTV process.

¹ Please follow the link for further information [SVG98/04](#)

² Please refer to the following link for information regarding P196 - [Modification Proposal P196](#)

2.1.3 Following the issue 0004 group's discussions, and with the agreement of the SVG we raised the following 5 LTV CPs:

- **CP1304** 'Exclusion of certain Site Visit Check Codes (SVCC) within the Long Term Vacant (LTV) site process';
- **CP1305** 'Use of Site Visit Check Code (SVCC) 20 with additional information in the Long Term Vacant (LTV) process';
- **CP1306** 'Removal of second criterion for identifying a site a Long Term Vacant (LTV)';
- **CP1307** 'Minor Changes to the Long Term Vacant Site Process' (these minor changes include removal of the J0040 Data Item (Register Reading), clarifying the end date for a LTV period and introducing a new process for withdrawing an initial LTV site reading); and
- **CP1308** 'Changes to Long Term Vacant Site process where a reading is obtained via a warrant', (this change was initially issued as [DCP0044](#)).

2.1.4 For a full impact matrix of the redline text changes please refer to Attachment F.

2.2 Responses to the impact assessment

2.2.1 We issued all 5 LTV CPs (1304 to 1308) for impact assessment (via CPC00667) in July 2009. The majority of respondents supported all 5 of the LTV CPs. Respondents who agreed with the proposals believed that they introduced a sensible set of changes that would improve the LTV process and align it with their current practices.

2.2.2 CP1304 Industry Responses

2.2.2.1 We received 16 responses; of these 10 agreed, 2 disagreed and 4 were neutral.

2.2.2.2 The 2 respondents who disagreed with CP1304 did so because they disagree with the principle of the change, and believe that a site should only remain in the LTV process if the SVCC 02 code is entered either on its own or in conjunction with any other SVCCs. We confirmed that a site will still fall out of the LTV process if a 02 SVCC is not received within 7 months of the last 02 code. More detail is provided in Appendix 1 on page 11.

2.2.2.3 We recommend, based on CP1304 ensuring that LTV sites are not inadvertently removed from the LTV process and majority industry support, that you:

- **APPROVE CP1304** for implementation in the February 2010.

2.2.3 CP1305 Industry Responses

2.2.3.1 We received 16 responses; of these 9 agreed, 4 disagreed and 3 were neutral.

2.2.3.2 Two of the respondents who disagreed with CP1305, did so for the same reasons as highlighted in CP1304.

2.2.3.3 The third respondent believed that the correct codes should be used rather than making allowances for bad practices.

2.2.3.4 The fourth respondent believed that the additional information section within SVCC 20 should be standardised in order to ensure a consistent approach within the LTV process. The respondent believed that CP1305 would be hard to control and manage, as it would be introducing manual processes (increasing the potential for human error), higher costs and discretionary decision making.

2.2.3.5 The issue 0004 group believed that this solution would mitigate this chance of LTV sites falling out of the process unnecessarily, and felt that the process can be managed manually. More detail is provided in Appendix 2 on page 19.

2.2.3.6 We recommend, based on CP1305 ensuring that LTV sites are not removed from the process unintentionally, can enter the LTV process where they are clearly LTV, and majority industry support, that you:

- **APPROVE CP1305** for implementation in the February 2010.

2.2.4 CP1306 Industry Responses

2.2.4.1 We received 16 responses; of these 12 agreed, 2 disagreed and 2 were neutral.

2.2.4.2 One of the respondents who disagreed believed that we should ensure that Suppliers adhere to the current process, rather than changing the process to align with bad practices.

2.2.4.3 The second respondent who disagreed with the proposal raised a concern that the Meter would not be read if the second criterion was removed. We confirmed that this should not occur as Data Collectors would still be expected to make every effort to read the Meter (as they would still be required to do so by criterion 4 and 5). The respondent subsequently changed their view and agreed to support CP1306. More detail is provided in Appendix 3 on page 27.

2.2.4.4 We recommend, based on CP1306 removing an unnecessary criterion and aligning it with current industry processes and majority industry support, that you:

- **APPROVE CP1306** for implementation in the February 2010.

2.2.5 CP1307 Industry Responses

2.2.5.1 We received 16 responses; of these 12 agreed, 1 disagreed and 2 were neutral. The final respondent agreed with solution 2 of the CP, but disagreed with solutions 1 and 3.

2.2.5.2 The respondent who disagreed with CP1307 overall, did so because they felt that additional clarity was needed. We confirmed that in addition to these CPs, we are also drafting a LTV guidance note.

2.2.5.3 The respondent who disagreed with solutions 1 and 3 did so because they believed that the current process was better than the proposed solutions. They disagreed with solution 3 because they believed that we should not provide Suppliers with the flexibility to replace the withdrawn initial reading with the reading taken at the end of the LTV period. As they believed that the initial reading will be more accurate, and that Suppliers should use this reading were possible. More detail is provided in Appendix 4 on page 33.

2.2.5.4 We recommend, based on CP1307 providing additional clarity for Parties and allowing a more accurate reading to replace an initial LTV reading, and majority industry support, that you:

- **APPROVE CP1307** for implementation in the February 2010.

2.2.6 CP1308 Industry Responses

2.2.6.1 We received 15 responses; of these 12 agreed, 1 disagreed and 2 were neutral.

2.2.6.2 The one respondent disagreed with CP1308 because they would need to make changes to their Supplier and Supplier Agent systems; and they feel that the cost of these changes is not justified by the extent of this issue.

2.2.6.3 The respondent was also concerned that the site may be occupied at some point between the warrant read and the next D0004 (with a SVCC 02) being received. In this situation, they believe

Settlement would be under-recording consumption. We note their concern, but believe this scenario is unlikely. More detail is provided in Appendix 5 on page 43.

We recommend, because CP1308 will reduce the chance of energy being erroneously allocated to a site which is vacant (and where there is no consumption) and majority industry support, that you:

- **APPROVE CP1308** for implementation in the February 2010.

2.3 Implementation Costs

| | BSC Agent (Demand Led) | ELEXON Operational | | Total | | Impacts |
|---------------|---------------------------|--------------------|------|-------|-----------|---------|
| | Cost | Man Days | Cost | Cost | Tolerance | |
| CP1304 | £0 | 1 | £220 | £220 | 10% | BSCP504 |
| CP1305 | £0 | 1 | £220 | £220 | 10% | BSCP504 |
| CP1306 | £0 | 1 | £220 | £220 | 10% | BSCP504 |
| CP1307 | £0 | 1 | £220 | £220 | 10% | BSCP504 |
| CP1308 | £0 | 1 | £220 | £220 | 10% | BSCP504 |

3 **Update on CP1267**

3.1 Background

- 3.1.1 Historically Unmetered Supply Operators (UMSOs) and Meter Administrators (MAs) have also been Meter Operator Agents (MOAs) and are recognised in SMRS systems by their MOA market participant identifier (MPID). There are now UMSOs/MAs who are not also MOAs; and unfortunately the SMRS system does not recognise these agents. CP1267 seeks to resolve this matter to allow participants to register all valid UMSOs and MAs. An example of this issue exists in the SWAE GSP Group where the UMSO identifier 'SWAE' (SWAE is a valid UMSO MPID in Market Domain Data (MDD)) has ceased to be a MOA. This prevents SWAE from being registered as an UMSO and hampers Suppliers as they would be unable to register this agent and comply with their BSC obligations in accordance with Section S and Section J (For further details please refer to [SVG103/02](#)).
- 3.1.2 We presented CP1267 at SVG102, with a recommendation that the SVG approve CP1267 version 1.0 and reject version 2.0. The SVG had noted the contents of the CP assessment report ([SVG102/01](#)) and requested an investigation into a potential manual solution, in light of concerns on the high CP implementation costs.
- 3.1.3 We presented the result of this investigation to the SVG at SVG103; highlighting that St. Clements (the SMRS service provider) indicated that this solution is not feasible as whilst SMRS system allows manual amendments to registration data, any manual changes would be overwritten each time an MDD file is loaded.
- 3.1.4 The SVG requested a further investigation into whether it was feasible to amend the MDD. This solution would amend the MDD table containing the valid set of MOA to include independent UMSOs and independent MAs as well as valid MOAs.
- 3.1.5 Such an amendment would allow the SMRS system to accept UMS registrations where the appointed UMSO or MA is not also a valid MOA. The SMRS would view all the MPIDs in the amended MDD MOA table as 'valid MOAs', even if they are actually independent UMSOs or MAs.

3.2 Amendments to MDD

3.2.1 MDD is a central database used in the Supplier Volume Allocation (SVA) market for participants to send and receive valid Settlement information. It is essential to the operation of the SVA arrangements as it includes critical information such as Profile Classes and valid Market Participant IDs. For the BSC arrangements to work efficiently, it is essential that the MDD contains, and that Market Participants use, the correct market data.

3.3 The solution proposed by the SVG suggests including UMSOs and MAs in the valid set of MOAs in MDD. However, the implication of this is that the wrong agent type could be appointed thereby impacting agent appointments/registrations for both metered and Unmetered Supplies. For example, a Supplier could wrongly appoint an independent UMSO (who is not a valid MOA) as the MOA for a metered supply; the independent UMSO is not a valid MOA and would be unable to carry out the required MOA tasks.

3.3.1 This amendment has the potential to frustrate Parties using the agent appointment/registration process as it would require a lot of effort and therefore cost to ensure that:

- the correct agent and agent type is appointed to the respective Metering System; and
- Settlement data is captured accurately and in a timely manner.

3.3.2 To prevent such instances from occurring, there are provisions in BSCP509 and Section J 2.1.1 of the Code which highlight that an agent can operate only in the area it has Qualified in. This also ensures that the data contained within MDD relating to valid agents is accurate. Section J of the Code states that Parties can only appoint and use Party Agents that are Qualified to carry out the role that they have been appointed to.

3.3.3 BSCP509 requires a Party Agent to have Qualified before entering MDD. Although the BSCP does not specify that you must enter MDD in the role you've Qualified in, this is implicit in the MDD Change Request Form.

3.3.4 By including independent UMSOs and MAs in MDD, there is a risk that Parties may unknowingly appoint an 'unqualified' agent, and in doing so be in breach of the provisions described above (in section 3.3.2).

3.3.5 Therefore, any change to the MDD would also require a change to the provisions of the BSCP and a Modification to the Code, which would have a cost in the same magnitude required to implement CP1267 version 1.0.

3.4 Viable solutions

3.4.1 During the assessment for CP1267 version 1.0, we noted that respondents were generally supportive of the principle behind CP1267 and recognised the current situation as a problem. Conversely, respondents had split views on the proposed solution.

3.4.2 Views were split between those that believed the defect identified should be addressed and those that believed that the proposed solution was not cost effective.

3.4.3 In order to obtain a solution that was unanimously supported by industry, we considered, through industry consultation, several solutions ranging from generic 'dummy' MPIDs in MDD to a more robust CP1267 version 2.0 solution. However, none of these solutions were as cost effective when compared to CP1267 version 1.0.

3.4.4 We also believe that a 'do nothing' approach should not be an option as:

- The current problem of registering independent UMSOs and MAs will still exist and could affect other GSP Groups in the future;
- There is no clarity regarding agent appointments for HH UMS;
- Wrong data is potentially being used in the SMRS; and
- The identity of the UMSO and MA may remain unknown. This is a problem on a Change of Supplier, as there is no BSC process to confirm the identity of the UMSO or MA.

3.5 With this in mind, we believe that CP1267 is the most cost effective option that resolves the defect identified. We have also obtained revised implementation costs for CP1267 v1.0 which are noted below.

3.6 Revised Implementation Costs

3.6.1 The ELEXON implementation costs for CP1267 (version 1.0 or 2.0) are unchanged from SVG102 and stand at under £1k. As previously indicated, the majority of the costs for CP1267 would be due to the SMRS system changes needed. Following SVG103, we asked St. Clements to confirm the implementation costs for making the change to SMRS to accept independent UMSO and MA identifiers.

3.6.2 St. Clements have indicated that the implementation costs for CP1267 are in the region of £16 – 23k as it constitutes a change to the core functionality of SMRS. This cost includes the re-instatement of role codes 3 and 4 (for an explanation on role codes, please refer to Appendix 1 of [SVG102/01](#)) as well as validation of the Measurement Class against the MPID contained in the MOA field of a D0055 appointment flow.

3.6.3 These costs do not include the individual costs for each of the 19 LDSOs to implement these changes.

3.7 Recommendation

3.8 We invite the SVG to:

- **APPROVE** CP1267 version 1.0 for inclusion in the November 2010 Release, as the solution resolves the underlying issue with Unmetered registrations, reduces the risk to Settlement and has some support from industry;
- **REJECT** CP1267 version 2.0 (if you do choose to approve CP1267 v2.0, we recommend that it is included in the November 2010 Release), due to lack of support and the solution not being cost effective; and
- **AGREE** our suggested amendments to the redline text for CP1267 version 1.0 (shown in table 3 of Appendix 1 of SVG102/01).

4 **Change Proposal Impact Assessment Timetable 2009/2010**

4.1 The current timetable for the issuing of Draft Change Proposals (DCPs) and Change Proposals (CPs) for participant Impact Assessment finishes on 29 October 2009.

4.2 The proposed timetable for the period 2009 (30 October 2009 onwards) to 2010 is provided in Attachment G. We issued the timetable for consultation in CPC00667. We received 14 responses, of which 10 agreed and 4 were neutral. We received no comments on the new timetable.

4.3 We invite the SVG to:

- **APPROVE** the new Change Proposal Impact Assessment Timetable 2009/2010, for use from 30 October 2009.

5 Re-baselining of approved redlined text of CP1290 and CP1291 against the latest conformed version of BSCP520

5.1 The SVG approved CP1290 and CP1291 ([SVG101/02](#)) on 30 June 2009 for inclusion in the November 2009 Release. However, the redlining changes of both CPs are based on BSCP520 v14.0, and quite a few changes have been implemented since these changes were drafted (we are now on v16.1).

5.2 The original redlining therefore cannot be implemented directly into the latest BSCP520. This table includes all of the changes we have made to the CP1290 and CP1291 redlining, as we re-baselined them against the most up to date version of BSCP520 (v16.1).

| BSCP520 Section | CP1290 |
|-----------------|--|
| 1.2.5 | <p>The changes to this sentence:</p> <p>'However the UMSUG Chairman can agree TemporaryProvisional Codes for new Apparatus until they are formally approved by the Panel.'</p> <p>have been removed in the redlining since this sentence has been removed by CP1277 and is no longer included in BSCP520 v16.1.</p> |
| All 1.2.5 | <p>CP1277 introduced new wording into this section, which used the terms 'charging code', 'Time Switch Regimes'. As this is not consistent with the changes made by CP1290, so we have replaced these terms with 'Charge Codes' and 'Switch Regimes' accordingly throughout section 1.2.5.</p> |
| 1.3.1 | <p>CP1282 proposed to change:</p> <p>'The UMSO and MA shall also implement any Provisional Codes or Temporary Codes issued by the UMSUG Chairman.'</p> <p>However, in BSCP520 v16.1 it now reads:</p> <p>'The UMSO and MA shall also implement any Charge Codes or Temporary Codes issued by BSCCo.'</p> <p>So only 'and MA' has been added to the sentence, no change has been made to the wording 'Charge Codes', which was added by CP1277.</p> |
| 1.7.2 | <p>The definition of 'provisional code' has already been removed in BSCP520 v16.1, so there is no redlining showing this removal in BSCP520 v16.1.</p> <p>The definition of 'Temporary Code' is not in v16.1, so we have added the CP1290 approved definition into the redline text for CP1290 without deleting any text (as it no longer exists in v16.1).</p> <p>Now it reads:</p> <p>"Temporary Code" means a temporary 13 digit numeric code assigned to</p> |

| BSCP520 Section | CP1290 |
|-----------------|---|
| | <u>unmetered Apparatus that specifies the associated circuit watts and other technical information for the Apparatus and has been issued by the UMSUG chair for use, prior to formal approval from the Panel.</u> |
| 3.12 | <p>CP1277 introduced new wording into this section, which used terms that are not consistent with CP1290. So, in addition to the changes approved by SVG for CP1290 we have:</p> <ul style="list-style-type: none"> • Capitalised 'charge code' as 'Charge Code' • Replaced 'Charing Codes' by 'Charge Codes' • Replaced 'Switching Regimes' by 'Switch Regimes' |

| BSCP520 Section | CP1291 |
|-------------------|---|
| 3.1.11 and 3.3.1 | We have adjusted the alignment of recipients in the 'to' field and the flows in 'information required' field. So that it is clear that the D0148 and D0155 flows should be sent to the MA/HHDC, and the D0153 should be sent to the HHDA. |
| 3.3.1.4 and 3.4.1 | In BSCP16.1, there is no obligation for Supplier to send appointment details to UMSO (CP1277 removed this obligation). So we have not included 'UMSO' and 'D0148 Notification of Change to Other Parties' in the 'to' and 'information required' boxes. |
| 3.5.5 | In BSCP16.1, there is no obligation for Supplier to send appointment details to UMSO, (as this was removed by CP1277). So we have not included 'UMSO', 'D0148 Notification of Change to Other Parties' and 'D0155 Notification of New Meter Operator or Data Collector Appointment and Terms' in the 'to' and 'information required' boxes. |

5.3 We invite the SVG to:

- **NOTE** that we have re-baselined CP1290 and CP1291.

6 Amendments to P223 approved redlining (Profile Administrator Service Description Formatting)

6.1 As part of the implementation for Approved Modification P223 'Improvements to the Profile Administrator Service', changes were needed to the Service Description for Profile Administration. The SVG approved the changes to the Service Description at their meeting on the 30 June 2009 ([SVG101 Minutes](#)).

6.2 We have subsequently noticed a numbering error in Section 3. Paragraph 3.1.1 of the approved Service Description, as this paragraph should not have had a paragraph number associated with it. We have therefore removed the paragraph number and renumbered the remainder of the section. We do not see this as a material change and believe that this should be corrected. Please refer to attachment H for the relevant changes.

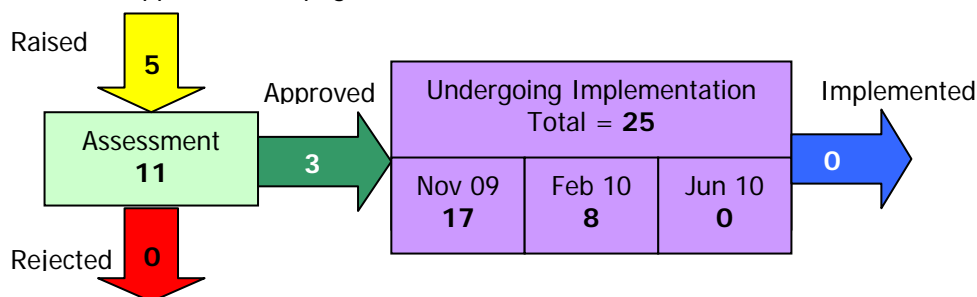
6.3 There has been no change to the content of the Service Description.

6.4 We invite the SVG to:

- **NOTE** that we have made a minor amendment to the P223 Profile Administrator Service Description approved redline text.

7 Summary of Open Change Proposals

7.1 There are currently **36** open CPs, SVG own **24** CPs, SVG and ISG co-own **8** CPs, and ISG own the remaining 4 CPs. 5 new CPs have been raised since the last SVG meeting. Details of the new CPs are in Appendix 7 on page 52.



Please note:

- The numbers in the boxes indicate current number of CPs in a given phase.
- The numbers in arrows show the variance in the past month.

8 Summary of Recommendations

8.1 We invite you to:

- **APPROVE** CP1304, CP1305, CP1306, CP1307 and CP1308 for inclusion in the February 2010 Release;
- **APPROVE** CP1267 v1.0 for inclusion in the November 2010 Release;
- **REJECT** CP1267 v2.0;
- **AGREE** our suggested amendments to the redline text for CP1267 version 1.0 (shown in table 3 of Appendix 1 of SVG102/01);
- **AGREE** the Change Proposal Impact Assessment Timetable for use from 23 October 2009;
- **NOTE** that the timetable was also taken to the ISG for approval last week;
- **NOTE** that we have re-baselined the CP1290 and CP1291 approved redlined text against latest conformed version of BSCP520;
- **NOTE** that we have made a minor amendment to the P223 Profile Administrator Service Description approved redline text; and
- **NOTE** the status of all open Draft Change Proposals and Change Proposals.

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List of Appendices:

- Appendix 1 – Detailed Analysis of CP1304
- Appendix 2 – Detailed Analysis of CP1305
- Appendix 3 – Detailed Analysis of CP1306
- Appendix 4 – Detailed Analysis of CP1307
- Appendix 5 – Detailed Analysis of CP1308
- Appendix 6 – Change Proposal Impact Assessment Timetable 2009/2010 consultation responses
- Appendix 7 – New Change Proposals
- Appendix 8 – Release Information

List of Attachments:

- Attachment A – CP1304 – BSCP504 redlined
- Attachment B – CP1305 – BSCP504 redlined
- Attachment C – CP1306 – BSCP504 redlined
- Attachment D – CP1307 – BSCP504 redlined
- Attachment E – CP1308 – BSCP504 redlined
- Attachment F – CP1304 to CP1308 document impact matrix
- Attachment G – Change Proposals Impact Assessment Timetable
- Attachment H – Profile Administrator Service Description formatting information

Appendix 1 – Detailed Analysis of CP1304

1 Why Change?

1.1 Background

1.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process' ([SVG98/04](#)). The issue 0004 Group recommended 5 changes to the LTV process, CP1304 is one of these.

1.2 The Problem

1.2.1 CP1304 aims to ensure that LTV sites are not automatically removed from the LTV process as a result of receiving the following Site Visit Check Codes (SVCCs):

- 18 'Unsafe premises',
- 19 'Call not made on routine visit',
- 20 'No access'; and/or
- 28 'Unable to gain access due to insufficient address details'.

1.2.2 The issue 0004 group believed that these codes should not result in the site being removed from the LTV process, as it is still likely that the site is LTV if one of these codes is received amongst 02 – 'Site not occupied' codes.

2 Proposed Solution

2.1 The process should be changed so that if any of the codes specified above were received while the site was in the LTV process the site would not automatically fall out of the process. The Supplier would still have to receive a '02' code within 7 months of the previous '02' code for the site not to fall out of the process.

2.2 If the Supplier did not receive a '02' code within 7 months, then the end date for the LTV period would be the day that the latest '02' code was received, not the date when the alternative code was received. In addition, this CP would only change the process for sites that are already in the LTV process (and not for sites entering the process). If multiple codes were received on the same flow where one was '02' and the rest were any of the above this would count as receiving a '02' code.

2.3 The redline changes for CP1304 and CP1305 both impact on section 4.15.3 Point (2). We recommend that if both CPs are approved then the redlining for CP1304 should be used for section 4.15.3 (2). We believe that this would fulfil the requirements for both CP1304 and CP1305 and align with the intention of the issue 0004 group. Please see attachment F for a more detailed explanation of this interaction.

2.4 Please see attachment A for the full redline text changes.

3 Intended Benefits

3.1 Certain LTV sites are falling out of the process due to the issue described in section 4.1. These sites may still be LTV and should therefore remain in the process provided the other criteria are met.

4 Industry Views

- 4.1 We issued CP1304 for impact assessment in July 2009 (via CPC00667).
- 4.2 We received 16 responses; of these 10 agreed, 2 disagreed and 4 were neutral.
- 4.3 The majority of responses supported CP1304 because they believe that it would introduce a sensible set of changes and would stop sites falling out of the LTV process unnecessarily.
- 4.4 The respondents who disagreed with CP1304 believed that a site should only remain within the LTV process if the SVCC 02 code is entered on its own or in conjunction with any other SVCCs.
- 4.5 We contacted the respondents and highlighted that the issue 0004 group had wanted to avoid a situation where a site would fall out of the LTV process as a result of receiving the following SVCCs - 18, 19, 20 or 28. We highlighted that these codes had resulted in various sites being withdrawn from the LTV process incorrectly in the past. In addition we highlighted that a Supplier would still need to receive a SVCC 02 code within 7 months of the previous 02 code for the site not to fall out of the process.
- 4.6 The respondents remained of their view and felt that they would only support this change if it required a 18, 19, 20 or 28 code to be submitted together with a 02 code, in order for a site to remain in the LTV process.

5 Impacts and Costs

- 5.1 Indicative impacts and costs for CP1304 are highlighted below.

| Market Participant | Cost/Impact | Implementation time needed |
|-----------------------|---|---|
| Suppliers | Several Suppliers highlighted that internal process and/or system changes would be needed. | Implementation timescales ranged from between 60WDs to 10 Months. The majority of Suppliers believed that the February 2010 Release would be suitable. 1 respondent indicated that they would not be able to implement the changes for the February 2010 Release. |
| Supplier Agents | Most Supplier Agents indicated that internal process and system changes would be required. | As above. |
| ELEXON Implementation | The estimated ELEXON implementation cost is 1 man day, which equates to approximately £220. | February 2010 Release suitable. |

6 Implementation Approach

- 6.1 We recommend that CP1304 be approved for the February 2010 Systems Release.

- 6.2 We note that one respondent did not believe they would be able to meet the proposed implementation date. The respondent highlighted that they did not believe that the changes would be difficult to implement, however they indicated that their current IT schedule was the reason for the 10 month implementation period.

7 Recommendation

- 7.1 We recommend, based on CP1304 ensuring that LTV sites are not unnecessarily removed from the LTV process and majority industry support, that you:

- **APPROVE CP1304** for implementation in the February 2010 Release.

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Table 1: Industry Impact Assessment Summary for CP1304 - Exclusion of certain Site Visit Check Codes (SVCC) within the Long Term Vacant (LTV) site process

| IA History CPC number | CPC00667 | Impacts | BSCP504 | | |
|--|---|---------|---------|---------|-------------------|
| Organisation | Capacity in which Organisation operates in | | | Agree? | Days to Implement |
| Central Networks | LDSO | | | Yes | -- |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | | | Neutral | N/A |
| GTC | LDSO | | | Neutral | -- |
| Gemserv | MRASCo Ltd | | | Neutral | -- |
| EDF Energy | Supplier, NHH Agents, HH MOP | | | No | |
| IMServ Europe | HHDC, DA and MO NHHDC, DA and MO | | | Yes | 30 |
| EDF Energy Networks (EPN, LPN, SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | | | No | -- |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | | | Yes | 0 |
| British Energy Direct Limited | Supplier | | | Yes | 30 |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | | | Yes | 0 |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | | | Yes | -- |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | | | Yes | 10 months |
| E.ON | Supplier | | | Yes | -- |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | | | Yes | -- |
| E.ON Energy Services Limited | NHHDC MOA | | | Neutral | 0 |
| NPower Limited | Supplier, Supplier Agents | | | Yes | 180 |

Table 2: Impact Assessment Responses

| Organisation | Agree? | Comments | Impacted? | ELEXON Response |
|---|---------|--|-----------|-----------------|
| Independent Power Networks Limited | Neutral | No additional comments. | No | - |
| GTC | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |

| | | | | |
|---------------|-----|--|----|--|
| EDF Energy | No | <p>Comments: A D0004 allows for multiple Site Visit Check Codes to be sent and so a code 02 can be sent in all cases where site is vacant. We would accept a change where if a code 02 is received amongst multiple other SVCCs then site can still be considered as being long term vacant. This would require a change to section 4.15.1 point 3 second bullet in BSCP504. Wording such as, could be suitable: "has not received any D0004s where a J0024 data item has excluded a value of 02 in the interim"</p> <p>If Suppliers and DCs have a problem in sending and receiving multiple values then this is their problem and is an insufficient reason for this change. There would seem to be no other reason for a change of this form rather than one that allows for multiple values and checks that a 02 has been seen in all D0004s. If they do have problems then in such cases they should agree that code 02 takes precedence over all other codes and send that one only. This process is currently full of aspects that cannot be easily verified, making its use suspect, so to relax rules around this process cannot be considered as a positive step forward.</p> <p>Furthermore we do not feel that any of these codes in themselves are sufficient to indicate site is long term vacant. All of these could still be used where a site is not vacant in terms of providing information on potential hazards to be aware of.</p> <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Impact on Organisation: We do not currently use this process so change will have no impact.</p> | - | <p>We contacted the respondent and highlighted that the issue 0004 group wanted to avoid a situation where a site would fall out of the LTV process as a result of receiving the following SVCCs - 18, 19, 20 or 28. The Group noted that these codes had resulted in various sites being withdrawn from the LTV process incorrectly in the past, when it was clear that the site was LTV.</p> <p>In addition we highlighted that the Supplier would still need to receive a SVCC 02 code within 7 months of the previous 02 code for the site not to fall out of the process, and so where the only SVCCs being received are 18, 19, 20 and/or 28, the site would still fall out of the process.</p> <p>The respondent remained of their view, and believes that a 02 code should be submitted in conjunction with any other code in order for the site to remain within the LTV process.</p> |
| IMServ Europe | Yes | <p>Comments: These are a sensible set of changes.</p> <p>Capacity in which Organisation is impacted NHHDC</p> <p>Impact on Organisation: Procedural changes only</p> <p>Implementation: 30</p> | No | - |

| | | Would implementation in the proposed Release have an adverse impact? No | | |
|--|-----|--|-----|--|
| EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd | No | <p>Comments: Firstly if two 02 codes are received within 7 months then that is probably enough to indicate the site is vacant. However we do not agree that codes 18,19,20 and 28 on their own indicate that the site is definitely vacant. For example how does no access or insufficient address details mean a site is vacant? Perhaps an alternative might be to allow a facility for two codes to be entered and as long as one was a 02 then it would count as vacant (this would cover a scenario for example where the site was vacant but premises were unsafe - both pieces of information are useful, a second example would be vacant and no access).</p> <p>Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted: LDSO Impact on Organisation: Processes</p> | Yes | <p>We contacted the respondent and confirmed that a site would still need to receive two 02 codes within 7 months of each other in order for it to remain within the LTV process.</p> <p>We indicated that the issue 0004 group wanted to avoid a situation where a site would fall out of the LTV process as a result of receiving the following SVCCs - 18, 19, 20 or 28. The Group noted that these codes had resulted in various sites being withdrawn from the LTV process incorrectly in the past, when it was clear that the site was LTV.</p> <p>The respondent remained of their view, and believes that a 02 code should be submitted in conjunction with any other code in order for the site to remain within the LTV process.</p> |
| G4S AccuRead | Yes | <p>Comments: The use of the Statistics gathered over the year to show which code caused a site to leave the LTV process does not prove anything and should be removed. It does not specify whether these sites were removed incorrectly or not and therefore prove nothing.</p> <p>Impact: No</p> | - | <p>We contacted the respondent and confirmed that we agreed with their view. We indicated that the statistics were provided as background information only and that the principle of the change would still remain even without the statistics.</p> <p>The respondent confirmed that they would have supported the change even without the additional statistics.</p> |
| British Energy Direct Limited | Yes | <p>Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? Supplier Impact on Organisation? Process changes</p> | Yes | <p>We contacted the respondent and confirmed that the next possible release would be February 2010. We also noted that one participant has requested 10 months to implement these changes.</p> |

| | | | | |
|------------------------------|-----|---|-----|--|
| | | Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release? | | The respondent was happy with this response and highlighted that they believed that these changes would be extremely beneficial to their organisation. |
| Scottish Power | Yes | Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No | No | - |
| Scottish and Southern Energy | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? NHHDC, Supplier Impact on Organisation? Significant changes to our system and processes. Additional comments: Due to our current IT scheduling, it will not be possible for us meet the proposed implementation date. | Yes | We contacted the respondent in order to clarify their reasons for requiring 10 months to implement CP1305. The respondent believed that the changes would not be difficult to implement, however, the respondent believe that their current IT scheduling would not allow them to meet the proposed implementation date. The respondent confirmed that the earliest release that they could meet would be 10 months after the approval of the SVG. The respondent indicated that they would only have timing issues with CP1304 and CP1305, as these had the largest impacts on their processes and systems. We explained that all other participants are able to meet the February 2010 Release. |
| E.ON | Yes | Capacity in which Organisation is impacted? Supplier Impact on Organisation? Systems / process | Yes | - |

| | | | | |
|---|---------|---|-----|--|
| E.ON Energy Services Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted Volume only Impact on Organisation: None Comments: No changes to current practice Would implementation in the proposed Release have an adverse impact? No Comments: As a NHH-DC we would not use code 28, for this reason however as the volume is so small we hold no objection as it's the Supplier's decision to install as LTV. | - | - |
| NPower Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted: Supplier Impact on Organisation: System and Process Changes | Yes | We have spoken to the respondent, as they requested 180WDs to implement these changes. They have confirmed that the February Release 2010 is achievable. |
| Independent Power Networks Limited | Neutral | Comments: No additional comments. | No | - |

We did not receive any comments on the redline text.

Appendix 2 – Detailed Analysis of CP1305

1 Why Change?

1.1 Background

1.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process' ([SVG98/04](#)). The issue 0004 Group recommended 5 changes to the LTV process, CP1305 is one of these.

1.2 The Problem

1.2.1 Currently if a Site Visit Check Code of '20 - No access' is received the site will be prevented from entering the LTV process or drop out if already in the process. This is an issue as often the additional information field (J0012) field shows clearly that the site is LTV.

2 Proposed Solution

2.1 Where a SVCC of 20 is received with 'site not occupied'/'long term vacant' or equivalent written in the additional information (J0012) field, this should be allowed to be treated as a SVCC 02 (i.e. would be a valid code for a site to enter the LTV process and also to remain in the LTV process).

2.2 The redline changes for CP1304 and CP1305 both impact on section 4.15.3 Point (2). We recommend that if both CPs are approved then the redlining for CP1304 should be used for section 4.15.3 (2). We believe that this would fulfil the requirements for both CP1304 and CP1305 and align with the intention of the issue 0004 group. Please see attachment F for a more detailed explanation of this interaction.

2.3 Please see attachment B for the full redline text changes.

3 Intended Benefits

3.1 The rationale for this change is that the two codes effectively mean the same thing. The difference is based on the working practice of the relevant data retrievers. The issue explained above is a barrier to the use of the LTV process for sites that the process is intended for.

4 Industry Views

4.1 We issued CP1305 for impact assessment in July 2009 (via CPC00667). We received 16 responses; of these 9 agreed, 4 disagreed and 3 were neutral.

4.2 The majority of responses were in support of the CP1305. Respondents who agreed with the proposal believed that it would prevent LTV sites falling out of the LTV process unnecessarily, allow sites that are clearly LTV to enter into the process and align the BSCP with their current practices.

4.3 Two of the respondents who disagreed with CP1305, did so for the same reasons as highlighted in CP1304.

- 4.4 Please refer to section Appendix 1 section 5.3 (above) for our response to these respondents.
- 4.5 The third respondent believed that the correct codes should be used rather than making allowances for bad practices.
- 4.6 We contacted the respondent and indicated that we also believed that the correct codes should be used during the process; however, the issue 0004 group felt that this change would ensure that LTV sites would not fall out of the process unnecessarily.
- 4.7 The fourth respondent believed that the additional information section within SVCC 20 should be standardised in order to ensure a consistent approach when submitting information during the LTV process. The respondent believed that CP1305 would be harder to control and manage as it would be introducing manual work (increasing the potential for human error), higher costs and discretionary decision making.
- 4.8 We contacted the respondent and highlighted that Suppliers should be responsible for assessing the additional information field to ascertain whether or not the site should enter the LTV process.
- 4.9 In addition we indicated that this process would be assessed by the BSC Auditor and if a site had entered the LTV process without adequate 'additional information' then an audit issue would be raised. The respondent remained of their view that this new process would be harder to control and that the current process should remain.

5 Impacts and Costs

- 5.1 Indicative impacts and costs for CP1305 are highlighted below.

| Market Participant | Cost/Impact | Implementation time needed |
|-----------------------|---|--|
| Suppliers | Several Suppliers highlighted that internal process and system changes would be needed. | Implementation timescales ranged from between 60 WDs to 10 Months. The majority of Suppliers believed that the February 2010 Release would be suitable. 1 respondent indicated that they would not be able to implement the changes for the February 2010 Release. |
| Supplier Agents | Some Supplier Agents believed that internal process and system changes would be required. | As above. |
| ELEXON Implementation | The estimated ELEXON implementation cost is 1 man day, which equates to approximately £220. | February 2010 Release suitable. |

6 Implementation Approach

- 6.1 We recommend that CP1305 be approved for the February 2010 Systems Release.

- 6.2 We noted that one respondent did not believe they would be able to meet the proposed implementation date. The respondent highlighted that they did not believe that the changes would be difficult to implement, however they indicated that their current IT schedule was the reason for the 10 month implementation period.

7 Recommendation

We recommend, based on CP1305 ensuring that LTV sites are not removed from the process unnecessarily, would allow sites that are clearly LTV to enter the process and majority industry support, that you:

- **APPROVE CP1305** for implementation in the February 2010 Release.

Lead Analyst: Stuart Holmes, tel. 0207 380 4135 or email stuart.holmes@elexon.co.uk.

Table 1: Industry Impact Assessment Summary for CP1305 - Use of Site Visit Check Code (SVCC) 20 with additional information in the Long Term Vacant (LTV) process

| IA History CPC number | CPC00667 | Impacts | BSCP504 | | |
|--|---|---------|---------|-------------------|--|
| Organisation | Capacity in which Organisation operates in | | Agree? | Days to Implement | |
| Central Networks | LDSO | | Yes | -- | |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | | Neutral | N/A | |
| GTC | LDSO | | Neutral | -- | |
| Gemserv | MRASCo Ltd | | Neutral | - | |
| EDF Energy | Supplier, NHH Agents, HH MOP | | No | -- | |
| IMServ Europe | HHDC, DA and MO NHHDC,DA and MO | | Yes | 30 | |
| EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | | No | - | |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | | No | 0 | |
| British Energy Direct Limited | Supplier | | Yes | 30 | |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | | Yes | 0 | |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | | No | - | |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | | Yes | 10 months | |
| E.ON | Supplier | | Yes | -- | |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | | Yes | -- | |
| E.ON Energy Services Limited | NHHDC MOA | | Yes | 0 | |
| NPower Limited | Supplier, Supplier Agents | | Yes | 180 | |

Table 2: Impact Assessment Responses

| Organisation | Agree? | Comments | Impacted? | ELEXON Response |
|---|---------|--|-----------|---|
| Independent Power Networks Limited | Neutral | Comment: IPNL are neutral to the proposal. We note that the change document states <i>"We note that this may be difficult to implement as it involves looking at the additional information field which may be difficult to automate. It would be up to the Supplier whether they do so"</i> . We hold concerns that if this process is not automated or sufficiently | No | We contacted the respondent and highlighted that Suppliers should be responsible for assessing the additional information field to ascertain whether or not the site should enter the LTV process. In addition we indicated that this process would be assessed by the BSC Auditor and if a site had |

| | | | | |
|---|---------|--|-----|--|
| | | monitored, there is potential for sites to remain in the LTV process if it is assumed that SVCC '20' means the site is vacant without checking the free text field. | | entered the LTV process without adequate 'additional information' then an audit issue may be raised. The respondent confirmed that they were happy with our response. |
| GTC | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |
| EDF Energy | No | Please see our comments for CP 1304 as they are also relevant to this CP. Impact on Organisation: We do not currently use this process so change will have no impact. | - | Please see the CP1304 table for ELEXON's response. |
| IMServ Europe | Yes | Comments: These are a sensible set of changes. Capacity in which Organisation is impacted NHHDC Impact on Organisation: Procedural changes only Implementation: 30 Would implementation in the proposed Release have an adverse impact? No | - | - |
| EDF Energy Networks (EPN,LPN, SPN) EDF Energy (IDNO) Ltd | No | Comments: If two 02 codes are received within 7 months then that is probably enough to indicate the site is vacant. However we do not agree that codes 18, 19, 20 and 28 on their own indicate that the site is definitely vacant. For example how would no access or insufficient address details mean a site is a vacant one? Perhaps an alternative might be to allow a facility for two codes to be entered and as long as one was a 02 then it would count as vacant (this would cover a scenario for example where the site was vacant but premises were unsafe - both pieces of information are useful, a second example would be vacant and no access). Impact on Organisation's Systems and/or | Yes | Please see the CP1304 table for ELEXON's response. |

| | | | | |
|--------------------------------------|-----|---|-----|---|
| | | <p>Processes? Yes</p> <p>Capacity in which Organisation is impacted: LDSO</p> <p>Impact on Organisation: Processes</p> | | |
| G4S AccuRead | No | <p>Comments: The correct codes should be used instead of allowances made for bad practice.</p> | No | <p>We contacted the respondent and indicated that we also believed that the correct codes should be used during the process; however, the issue 0004 group felt that this change would ensure that LTV sites would not fall out of the process unnecessarily. We explained that the issue 0004 group believed that this would improve the current process and that if Suppliers implemented this change successfully, there would be a reduction in LTV sites falling out of the processes unnecessarily.</p> <p>The respondent was happy with our explanation; however they continue to believe that the correct codes should be used rather than changing the process to align with bad practice.</p> |
| British Energy Direct Limited | Yes | <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted? Supplier</p> <p>Impact on Organisation? Process changes</p> <p>Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?</p> | Yes | <p>Please see the CP1304 table for ELEXON's response.</p> |
| Scottish Power | Yes | <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Impact on Organisation? Document changes only</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | No | - |

| | | | | |
|-------------------------------------|-----|--|-----|--|
| TMA Data Management Ltd | No | <p>Comments: Some standardisation is required for the additional info in case of SVC20 for LTV</p> <p>We believe that use of the Additional Information Field should only be on an exceptional basis and as an absolute last resort - as the use of such a free text field more or less precludes any automatic processing; and therefore introduces manual work, costs, human error and wide, hard to control, manage or audit discretionary decision making. We note that in the past SVG has rejected CPs that resort to use of the Additional Information Field on exactly this basis.</p> <p>This CP can only work if some standardisation of additional comments for LTV is introduced, otherwise it will be open to interpretation as to what is additional information that is suitable alongside an SVC of 20 to start the LVT process. It would also be very useful for Supplier, who would like to introduce automation of this process.</p> | No | <p>We contacted the respondent and confirmed that Suppliers would be responsible for assessing the additional information field to ascertain whether or not the site should enter the LTV process.</p> <p>In addition we indicated that this process would be assessed by the BSC Auditor and if a site had entered the LTV process without adequate 'additional information' then an audit issue may be raised.</p> |
| Scottish and Southern Energy | Yes | <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted? NHHDC, Supplier</p> <p>Impact on Organisation? Significant changes to our system and processes. Extra resourcing requirements.</p> <p>Additional comments: Due to our current IT scheduling, it will not be possible for us meet the proposed implementation date.</p> | Yes | Please see the CP1304 table for ELEXON's response. |
| E.ON | Yes | <p>Capacity in which Organisation is impacted? Supplier</p> <p>Impact on Organisation? Systems / process</p> | Yes | - |
| E.ON Energy | Yes | Impact on Organisation's Systems and/or | | We noted that the respondent preferred CP1305 to |

| | | | | |
|--------------------------------|------------|--|------------|--|
| <p>Services Limited</p> | | <p>Processes? Yes</p> <p>Capacity in which Organisation is impacted: NHHDC</p> <p>Impact on Organisation: None</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> <p>Comments: From our prospective we support this to in preference to 1304 as realistically we have scenarios which differentiate between 02 and 20 depending on the meter reader's assessment of the state of the property at the time of the visit.</p> | | <p>CP1304.</p> <p>We informed the respondent that if both CP1304 and CP1305 are approved we will consolidate the redlining.</p> <p>We recommend that the redlining proposed as part of CP1304 be used for section 4.15.3 (2) as this will align with the issue 0004 groups intended solution. The group's rationale was that they did not want a site to fall out of the LTV process if it did not receive a 20 code with additional information filled in. They believed that if this occurred it would not align with the principle of CP1304. Please see attachment F for more information.</p> |
| <p>NPower Limited</p> | <p>yes</p> | <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted Supplier</p> <p>Impact on Organisation System and Process</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | <p>Yes</p> | <p>We have spoken to the respondent, as they requested 180WDs to implement these changes. They have confirmed that the February Release 2010 is achievable.</p> |

We did not receive any comments on the redline text.

Appendix 3 – Detailed Analysis of CP1306

1 Why Change?

1.1 Background

1.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process' ([SVG98/04](#)). The issue 0004 Group recommended 5 changes to the LTV process, CP1306 is one of these.

1.2 The Problem

1.2.1 CP1306 suggests removing the second criterion in BSCP504 for classifying a site as LTV:

'The NHHDC is unable to gain access to read the Meter'.

1.2.2 The original intention of this criterion was that the NHHDC should check for the location of the Meter, and a site should not be specified as LTV where the Meter is on the outside of a property or in a stairwell of a block of flats as it should be possible to get a reading. However, this is not clear in BSCP504; and the Technical Assurance Checks carried out at the end of 2007 indicated that all Suppliers are interpreting this as synonymous with receiving a D0004 with SVCC 02 (Site not occupied).

2 Proposed Solution

2.1 The second criterion in BSCP504 section 4.15.1 for identifying a site as LTV should be removed.

2.2 Please see attachment C for the full redline text changes.

3 Intended Benefits

3.1 The criterion should be removed as it is superfluous given the Suppliers' interpretation. It is in a Supplier's best interest to obtain a read where possible so a vacant site would be on a non advancing read rather than in the LTV process. Also, just because a Meter is on the outside or in a stairwell does not necessarily mean the Meter reader can get access as the whole site may be boarded up.

4 Industry Views

4.1 We issued CP1306 for impact assessment in July 2009 (via CPC00667). We received 16 responses; of these 12 agreed, 2 disagreed and 2 were neutral.

4.2 The majority of responses were in support of CP1306. Respondents who agreed with the proposal believed that it introduced a sensible change given the results of the TA check.

4.3 One of the respondents who disagreed believed that we should ensure that Suppliers adhere to the current process, rather than changing the process to align with incorrect practices.

4.4 We contacted the respondent and highlighted that although the second criterion was being removed, it did not preclude the Data Collector from proactively attempting to read the

Meter. The 3rd criterion (section 4.15.3 within BSCP504) still requires the Data Collector to confirm that they are unable to obtain a reading from the Meter. The respondent remained of their view that Suppliers should adhere to the current process.

- 4.5 The second respondent who originally disagreed with CP1306 subsequently changed their view to supporting CP1306. The respondent initially raised a concern that the Meter would not be read if the second criterion was removed. We confirmed that this should not occur as Data Collectors were still expected to make every effort to read the Meter.

5 Impacts and Costs

- 5.1 Indicative impacts and costs for CP1306 are highlighted below.

| Market Participant | Cost/Impact | Implementation time needed |
|-----------------------|--|--|
| Suppliers | Several Suppliers highlighted that internal process and system changes would be needed for CP1306. | Implementation timescales ranged from between 10 days to 180 days. The majority of Suppliers believed that the February 2010 Release would be suitable. One respondent indicated that they would require 180 days in order to implement the necessary changes. |
| Supplier Agents | Some Supplier Agents believed that internal process and system changes would be required. | Implementation timescales ranged from between 30 days to 180 days. The majority of Supplier Agents believed that the February 2010 Release would be suitable. One respondent indicated that they would require 180 days in order to implement the necessary changes. |
| ELEXON Implementation | The estimated ELEXON implementation cost is 1 man day, which equates to approximately £220. | February 2010 Release suitable |

6 Implementation Approach

- 6.1 We recommend that CP1306 be approved for the February 2010 Systems Release.
- 6.2 We noted that one respondent required 180 days to implement the proposed change. We have spoken to the respondent and they have confirmed that they are able to implement CP1306 as part of the February 2010 Release.

7 Recommendation

We recommend, based on CP1306 removing a superfluous criterion and aligning the BSCP with current industry processes and majority industry support, that you:

- **APPROVE CP1306** for implementation in the February 2010 Release.

Lead Analyst: Stuart Holmes, tel. 0207 380 4135 or email stuart.holmes@elexon.co.uk.

Table 1: Industry Impact Assessment Summary for CP1306 - Removal of second criterion for identifying a site a Long Term Vacant (LTV)

| IA History CPC number | CPC00667 | Impacts | BSCP504 | |
|--|---|---------|---------|-------------------|
| Organisation | Capacity in which Organisation operates in | | Agree? | Days to Implement |
| Central Networks | LDSO | | No | -- |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | | Yes | N/A |
| GTC | LDSO | | Neutral | -- |
| Gemserv | MRASCo Ltd | | Neutral | -- |
| EDF Energy | Supplier, NHH Agents, HH MOP | | No | -- |
| IMServ Europe | HHDC, DA and MO NHHDC,DA and MO | | Yes | 30 |
| EDF Energy Networks (EPN,LPN,SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | | Yes | -- |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | | Yes | 0 |
| British Energy Direct Limited | Supplier | | Yes | -- |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | | Yes | 0 |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | | Yes | -- |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | | Yes | 15 |
| E.ON | Supplier | | Yes | --- |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | | Yes | -- |
| E.ON Energy Services Limited | NHHDC MOA | | Yes | 0 |
| NPower Limited | Supplier, Supplier Agents | | Yes | 180 |

Table 2: Impact Assessment Responses

| Organisation | Agree? | Comments | Impacted? | ELEXON Response |
|-------------------------|--------|--|-----------|--|
| Central Networks | No | <p>Comments: In many cases the meter will still be accessible even if a site is vacant, for example where the meter is in an external box. In these instances, we believe the meter should still be read to confirm no consumption in the interim period.</p> <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Capacity in which Organisation is impacted:</p> | No | <p>We agree that the Meter should still be read, and confirmed that Data Collectors were still expected to make every effort to read the Meter.</p> <p>We noted that the rationale for the removal is that it is essentially duplication of the other criteria - i.e. nothing in the</p> |

| | | | | |
|---|---------|---|----|---|
| | | <p>LDSO</p> <p>Impact on Organisation: None</p> <p>Would implementation in the proposed Release have an adverse impact? N/A</p> | | <p>process will change by removing this, as Suppliers would still need to fulfil criteria 3 (Supplier to make proactive attempts to identify the owner of the property in order to obtain a Meter reading) and 4 (If the owner of the property is know the Supplier must contact them to arrange a Meter reading)</p> <p>After contacting the respondent they changed their view to support CP1306.</p> |
| Independent Power Networks Limited | Yes | Impact on Organisation's Systems and/or Processes? No | No | - |
| GTC | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |
| EDF Energy | No | <p>Comments: The fact that Suppliers are ignoring this test, or assuming it is satisfied by a Site Visit Check Code of 02 is a blatant misuse of long term vacant process. This does not mean an appropriate way forward should be to remove test it means that better adherence to full rule set is required and increase examination of these MPANs must be undertaken by Elexon to ensure Suppliers are not misusing this process.</p> <p>Just because site is classed as vacant it does not mean a meter cannot be read and Suppliers must be able to show that they have made every effort to also determine that meter cannot be read before entering as long term vacant. Change suggests Suppliers are using Site Visit Check Code 02 as a sufficient test for meter being unable to be read should have all such MPANs removed from long term vacant process until they can provide meter cannot be read. To prove a meter is not readable they would need to ensure that their meter readers add</p> | - | <p>We contacted the respondent and highlighted that although CP1306 recommends removing the second criterion, it did not preclude the Data Collector from proactively attempting to read the Meter i.e. the 3rd criterion (section 4.15.3 in BSCP504) still requires the Data Collector to confirm that they are unable to obtain a reading from the Meter.</p> <p>We confirmed that the rationale for the removal is that it is essentially duplication of the other criteria (i.e. nothing in the process will change by removing this).</p> <p>The respondent remained of their view, and believes that Suppliers should continue to adhere to the current processes rather than removing existing requirements.</p> |

| | | | | |
|--------------------------------------|-----|--|----|---|
| | | <p>such details as additional information when using site visit check code 02 for a site to be valid for this process. Exelon's role here should be to ensure settlement integrity and not to allow loopholes in processes and non conclusive information to sway decisions on long term vacant sites.</p> <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Impact on Organisation: We do not currently use this process so change will have no impact.</p> | | |
| IMServ Europe | Yes | <p>These are a sensible set of changes.</p> <p>Capacity in which Organisation is impacted NHHDC</p> <p>Impact on Organisation: Procedural changes only</p> <p>Implementation: 30</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | - | - |
| British Energy Direct Limited | Yes | <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Would implementation in the proposed Release have an adverse impact? No.</p> <p>However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?</p> | No | Please see the CP1304 response table for ELEXON's response. |
| Scottish Power | Yes | <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Impact on Organisation? Document changes only</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | No | - |

| | | | | |
|-------------------------------------|-----|---|-----|---|
| Scottish and Southern Energy | Yes | Impact on Organisation's Systems and/or Processes? No Capacity in which Organisation is impacted? NHHDC, Supplier Impact on Organisation? Minor procedural changes | No | - |
| E.ON | Yes | Comments: No additional comments. | No | - |
| E.ON Energy Services Limited | Yes | Impact on Organisation's Systems and/or Processes? No Capacity in which Organisation is impacted: NHHDC | No | - |
| NPower Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted: Supplier Impact on Organisation: System and Process Changes Would implementation in the proposed Release have an adverse impact? No | Yes | We have spoken to the respondent and they have confirmed that they are able to implement CP1306 as part of the February 2010 Release. |

We did not receive any comments on the redline text.

Appendix 4 – Detailed Analysis of CP1307

1 Why Change?

1.1 Background

1.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process' ([SVG98/04](#)). The issue 0004 Group recommended 5 changes to the LTV process, CP1307 is one of these.

1.2 The Problem

1.2.1 CP1307 recommends changes to resolve 3 related issues:

- 1) To enter the LTV site process a number of checks must be made including that the Supplier must not have received any data flows containing the J0040 'Register Reading' in the proposed LTV period. In reality, Suppliers do not check each incoming data flow that contains the J0040 data item to see if this field is populated. Instead they check whether they have any readings for the proposed LTV site in their systems, i.e. they look at the output of the Data Flow as opposed to the flow input.
- 2) BSCP504 currently states that where a Meter reading has been obtained at the end of the LTV period, the date that the reading was obtained should be used as the end date of the LTV period. The issue 0004 group felt that this was incorrect as the Meter reading is defined to be taken at midnight at the start of the day the reading is taken, (i.e. at the start of Settlement Period 1). This means that the zero Estimated Annual Consumption (EAC) for the Long Term Vacant period should end the day before the Meter reading is taken and the new non-zero EAC should start on the day that the Meter reading is taken.
- 3) Where a Meter reading is obtained for a LTV site, which removes it from the LTV site process, this is often less than the reading deemed at the start of the LTV process. This is generally due to the initial deemed reading being based on a non-zero EAC which often includes a period where the site was not occupied. If the reading taken at the end of the LTV period creates an erroneously large AA for the LTV period then it can be withdrawn under BSCP504. If it creates an incorrect, e.g. negative AA which is not erroneously large, then it cannot be withdrawn under the current rules. This creates problems validating future readings. The issue 0004 group agreed that it would be useful to be able to withdraw the initial deemed Meter reading for a Long Term Vacant site where this is greater than a future actual reading, provided that the reading had not passed the Final Reconciliation Run.

2 Proposed Solution

2.1 CP1307 proposes:

- 1) Amending Sections 4.15.1, 4.15.2, 4.15.3 and 4.15.4 of BSCP504 to remove references to the J0040 Data Item and replace it with reference to a Meter reading having been obtained.

- 2) Amending section 4.15.5 of BSCP504 to state the end date for a Long Term Vacant period should be the date before the date of the Meter reading obtained to end the period.
- 3) Introducing a new process into section 3.3.8 of BSCP504 to allow the withdrawal of an initial Long Term Vacant site reading. If the new initial reading entered is equal to the reading taken at the end of the Long Term Vacant period, then there will be a zero AA for the whole Long Term Vacant period. If the reading is withdrawn and no new reading is entered, the site will be treated as if it was never in the Long Term Vacant process.

2.2 Please see attachment D for the full redline text changes.

3 Intended Benefits

3.1 The Technical Assurance Check carried out in November / December 2007 and the BSC Audit highlighted a number of clarifications that could usefully be made to BSCP504 to aid the processing of Long Term Vacant sites. In addition Suppliers and Non-Half Hourly Data Collectors have highlighted other issues with the process.

4 Industry Views

- 4.1 We issued CP1307 for impact assessment in July 2009 (via CPC00667). We received 16 responses; of these 12 agreed, 1 disagreed and 2 were neutral. One respondent agreed with solution 2 but disagreed with solutions 1 and 3.
- 4.2 The majority of responses were in support of CP1307. Respondents who agreed with the proposals believed that they introduced a sensible set of changes that would lead to an improvement in the LTV process.
- 4.3 The respondent who disagreed with CP1307 believed that only site reads taken after the LTV initiation date should cause a stop to the process.
- 4.4 We contacted the respondent and highlighted that we would be issuing a guidance note in order to clarify that only readings taken after the LTV initiation date should be used to stop the process. Following this confirmation, the respondent indicated that they would remove their objection to CP1307 and would remain neutral.
- 4.5 In addition the respondent queried why CP1307 impacts the EAC/AA calculation process.
- 4.6 We highlighted that the issue 0004 group believed that the current text within section 4.15.5 'End Date for the Long Term Vacant Period' needed to be amended, in line with solution 2, to reflect current practices. In addition the issue 0004 group believed that the current text was not clear for parties and that CP1307 provided an ideal opportunity to improve the general understanding of the process. The respondent was happy with this explanation.
- 4.7 The respondent who disagreed with solution 1 believed that the current process was better than the proposed solution. We noted the respondent's comments regarding solution 1 and highlighted that the majority of respondents were in favour of this solution.
- 4.8 The same respondent disagreed with solution 3 as they believed that this solution should not provide Suppliers with the flexibility to replace the withdrawn reading with the reading taken at the end of the LTV period.

- 4.9 We explained that the LTV process is optional for Suppliers and that it would not be possible to mandate the proposed solution.
- 4.10 The respondent's original views still remain as they believe that the current process is more effective and that Suppliers should adhere to the process rather than changing it to fit in with current practices.

5 Impacts and Costs

- 5.1 Indicative impacts and costs for CP1307 are highlighted below.

| Market Participant | Cost/Impact | Implementation time needed |
|-----------------------|--|--|
| Suppliers | Several Suppliers highlighted that internal process and system changes would be needed for CP1307. | Implementation timescales ranged from between 10 days to 180 days. The majority of Suppliers believed that the February 2010 Release would be suitable. One respondent indicated that they would require 180 days in order to implement the necessary changes. |
| Supplier Agents | The majority of Supplier Agents noted that internal process and system changes would be required. | See above. |
| ELEXON Implementation | The estimated ELEXON implementation cost is 1 man day, which equates to approximately £220. | February 2010 Release suitable. |

6 Implementation Approach

- 6.1 We recommend that CP1307 be approved for the February 2010 Systems Release.
- 6.2 We noted that one respondent required 180 days to implement the proposed change. We have spoken to the respondent and they have confirmed that they are able to implement CP1307 as part of the February 2010 Release.

7 Recommendation

- 7.1 We recommend, based on CP1307 providing additional clarity for Parties and allowing a more accurate reading to replace an initial LTV reading, and majority industry support:
- **APPROVE CP1307** for implementation in the February 2010 Release.

Lead Analyst: Stuart Holmes, tel. 0207 380 4135 or email stuart.holmes@elexon.co.uk.

Table 1: Industry Impact Assessment Summary for CP1307 - Minor Changes to the Long Term Vacant Site Process

| IA History CPC number | CPC00667 | Impacts | BSCP504 | |
|--|---|---------|--------------|-------------------|
| Organisation | Capacity in which Organisation operates in | | Agree? | Days to Implement |
| Central Networks | LDSO | | Yes | -- |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | | Yes | N/A |
| GTC | LDSO | | Neutral | -- |
| Gemserv | MRASCo Ltd | | Neutral | |
| EDF Energy | Supplier, NHH Agents, HH MOP | | Yes | -- |
| IMServ Europe | HHDC, DA and MO NHHDC, DA and MO | | Yes | 30 |
| EDF Energy Networks (EPN, LPN, SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | | Yes | -- |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | | No | 90 |
| British Energy Direct Limited | Supplier | | Yes | 30 |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | | Yes | 0 |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | | Yes | 30 |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | | Yes | 15 |
| E.ON | Supplier | | Yes | -- |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | | Yes | 120 |
| E.ON Energy Services Limited | NHHDC MOA | | Yes | 30 |
| NPower Limited | Supplier, Supplier Agents | | See Comments | 180 |

Table 2: Impact Assessment Responses

| Organisation | Agree? | Comments | Impacted? | ELEXON Response |
|---|---------|--|-----------|-----------------|
| Independent Power Networks Limited | Yes | Impact on Organisation's Systems and/or Processes? No | No | - |
| GTC | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |

| | | | | |
|----------------------|-----|---|---|--|
| EDF Energy | Yes | <p>Comments: With regard to point 3 we do not feel that this should be an optional process if date for initial deemed read has yet to pass RF. Withdrawing and replacing such reads would seem to be better for maintaining settlement accuracy and as such should be mandated.</p> <p>Impact on Organisation: We do not currently use this process so change will have no impact.</p> | - | <p>We contacted the respondent and confirmed that the majority of respondents agreed with the proposed solution.</p> <p>In addition we explained that because P196 was an optional process, Suppliers were not obligated to withdraw/replace the deemed Meter reading. We indicated that the issue 0004 group had not wanted to prescribe a method to use in this situation because it would have removed the Suppliers ability to select their preferred method.</p> <p>The respondent was happy with this response, and continues to support CP.</p> |
| IMServ Europe | Yes | <p>Comments: These are a sensible set of changes.</p> <p>Capacity in which Organisation is impacted NHHDC</p> <p>Impact on Organisation: Procedural changes only</p> <p>Implementation: 30</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | - | - |
| G4S AccuRead | No | <p>Comments: These minor changes affect a great deal of the LTV process and some of it seems like a waste of time and effort to change it. Overall the whole CP should be re-considered.</p> <ol style="list-style-type: none"> 1. The change is sound in principle but should also consider that only site reads that are taken after the LTV initiation date should cause a stop to the LTV process. 2. I must have misunderstood this section as it appears to pointlessly describe the already functioning EAC/AA calculation process? <p>The change is sound in principle but there should be</p> | - | <p>We contacted the respondent and highlighted that we would be issuing a guidance note to Parties clarifying how to deal with site reads that are taken after the LTV initiation date.</p> <p>In relation to the respondent's second point, we indicated that the issue 0004 group believed that the current text needed to be amended, in line with</p> |

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| | | no reliance placed on the Supplier to initiate the fixing of these reads. Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted: NHHDC Impact on Organisation: Process changes would be required to initiate monitoring and replacing LTV reads as per solution part 3 Implementation: 90 | | solution 2 to reflect current practices. In addition the issue 0004 group believed that the current text was not clear for parties and that this change would improve the general understanding of the process Following this clarification, the respondent indicated that they would remove their objection to CP1307 and would remain neutral. |
| British Energy Direct Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted? Supplier Impact on Organisation? Process changes Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release? | Yes | We contacted the respondent and highlighted that the next possible release would be February 2010. The respondent was happy with this response and highlighted that they believed that these changes would be extremely beneficial to their organisation. |
| Scottish Power | Yes | Impact on Organisation's Systems and/or Processes? No Impact on Organisation? Document changes only Would implementation in the proposed Release have an adverse impact? No | No | - |
| TMA Data Management Ltd | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted NHHDC Impact on Organisation Process How much Implementation Notification is required from receipt of approved redline text changes? 30 | Yes | - |
| Scottish and | Yes | Impact on Organisation's Systems and/or Processes? Yes | Yes | - |

| | | | | |
|-------------------------------------|-----|--|-----|---|
| Southern Energy | | Capacity in which Organisation is impacted Supplier, NHHDC Impact on Organisation Minor procedural changes | | |
| E.ON | - | Capacity in which Organisation is impacted? Supplier / NHHDC Impact on Organisation? Systems / process Other comments: E.ON think that clarity is needed, as the change supposes that an LTV deem cannot be withdrawn under current rules. It would appear that withdrawal of an LTV deem is possible under normal circumstances, subject to the fluidity of the data. | - | We contacted E.ON and confirmed that we would be issuing a guidance note to Parties clarifying what the current rules are for Parties. The respondent was happy with our response. |
| Siemens Metering Services | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted): NHHDC Impact on Organisation: Complex process changes would be required to facilitate the 3rd solution. How much Implementation Notification is required from receipt of approved redline text changes? 120 Comments: We would need a minimum of 4 months to implement the 3rd solution of this CP. Would implementation in the proposed Release have an adverse impact? - Please provide details of the associated costs on your organisation to implement the change. Costs are unknown at this time, as they would be impacted by any increase in Supplier requests to change readings (in relation to part 3). | - | - |
| E.ON Energy Services Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted: NHHDC Impact on Organisation: Manual Process change | Yes | - |

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| | | <p>only</p> <p>How much Implementation Notification is required from receipt of approved redline text changes?</p> <p>No. of Calendar Days 30</p> <p>Comments: Training Material and roll-out. Work alongside Supplier on how they would send work stream through.</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> <p>Comments: New Manual process to work this</p> | | |
| NPower Limited | <p>Yes Solution 1&3</p> <p>2. No Solution 1&3</p> | <p>Comments: We believe these solutions should be split into 3 different Change Proposals and not combined.</p> <p>Solution 1 – Reject this Solution - The Long Term Vacant (LTV) process should be based on clearly defined data items. Even though the (J0040) 'Register Reading' is synonymous with "Meter Reading", it is preferred that the reference remains to the process INPUT rather than the process Output. This would avoid any potential confusion with any reference to 'estimated' meter readings (e.g. within the Supplier's billing system).</p> <p>Solution 2 – Agree that section 4.15.5 should be amended to state the end date for a Long Term Vacant Period should be the date before the date of the Meter reading obtained to end the period.</p> <p>Solution 3 – Reject this Solution - With reference to the proposed text (3.3.8.4.1) (red-line version) the action stated is "Send notification that the deemed</p> | - | <p>We contacted the respondent and highlighted that the issue 0004 group believed that these changes would only have minor impacts on Parties and that they should be incorporated into one CP to reduce the number of CPs being distributed.</p> <p>We note the respondent's comments regarding solution 1 and highlighted that the majority of respondents were in favour of the proposal. The issue 0004 group believed that this would align the process with what Suppliers are actually doing i.e. confirming that they have readings for the proposed LTV site in their systems.</p> <p>In relation to the respondent's comments regarding solution 3, we indicated that this process was optional for Suppliers and that</p> |

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| | | <p>initial meter register reading(s) at the start of the Long Term Vacant period is incorrect. Instruct whether or not to replace the withdrawn reading with the reading taken at the end of the Long Term Vacant Period, in accordance with Appendix 4.5”</p> <p>It is proposed that a consistent approach should be applied if it was felt that the deemed initial meter reading for the Long Term Period was incorrect. For example alter the text for 3.3.8.4.1 to “Send notification that the deemed initial meter register reading(s) at the start of the Long Term Vacant period is incorrect. Instruct whether or not to replace the withdrawn reading with the reading taken at the end of the Long Term Vacant Period, in accordance with Appendix 4.5”</p> <p>This change proposal does not provide enough clarity as to how the NHHDC would handle an instance involving crystallised data and seek more clarity.</p> <p>Impact on Organisation’s Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted: Supplier, NHHDC</p> <p>Impact on Organisation: System and Process Impact</p> <p>How much Implementation Notification is required from receipt of approved redline text changes? 180</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | <p>it would not be possible to mandate the proposed solution because Suppliers were still able to select a preferred method.</p> <p>We also discussed the respondents query regarding crystallised data. We indicated that the NHHDC should not withdraw the reading if it has passed RF (this is included in footnote 3 of the redlining, please refer to attachment D) and so should not be changing crystallised data. If the NHHDC withdraws a reading that is associated with an AA that spans RF, then they would have to deem at the RF boundary. This is a current requirement and would not be changed by this CP.</p> <p>The respondent remained of their views and still doesn't support solutions 1 and 3.</p> <p>We have spoken to the respondent and they have confirmed that they are able to implement CP1307 as part of the February 2010 Release.</p> |
|--|--|---|---|

Table 9: Comments on the redline text

| No. | Organisation | Document name | Location | Severity Code ³ | Comments | ELEXON Recommendation |
|-----|------------------------------|---------------|----------------|----------------------------|--|---|
| 1 | E.ON Energy Services Limited | BSCP504 | 4.5.2 RED TEXT | MEDIUM | The term "INITIAL reading" can be interpreted as two different things INITIAL reading type or INITIAL READING at the start of the LTV Process The use of different terminology could be used (Read at start of LTV Process etc) | <p>We contacted the respondent and highlighted that we believed that the current terminology was sufficient and clear. We also confirmed that the working group had reviewed the wording and are comfortable with it.</p> <p>We therefore recommend that no amendments should be made to the to the redline text. We note that the respondent still believes that the terminology should be made clearer.</p> |
| 2 | E.ON Energy Services Limited | | 4.15.1 | HIGH | Does not contain changes for code 20 with additional information? | <p>We contacted the respondent and highlighted that the changes to include the SVCC '20' is part of CP1304 and CP1305. Therefore this change will be included as part of those CPs.</p> <p>The respondent is now comfortable that no amendment is needed to the redline text.</p> |

³ High, Medium or Low

Appendix 5 – Detailed Analysis of CP1308

1 Why Change?

1.1 Background

1.1.1 On the 31 March 2009 the SVG agreed to form a review group to discuss issue 0004 'Improvements and Clarifications to the Long Term Vacant (LTV) Site process' ([SVG98/04](#)). The issue 0004 Group recommended 5 changes to the LTV process, CP1308 is one of these.

1.2 The Problem

1.2.1 CP1308 proposes to allow a warrant read to be replicated at the start of the next LTV period, where the warrant read has caused the site to fall out of the LTV process. The current process of deeming a new read for the start date of the new LTV period will introduce error into Settlement, as energy is likely to be allocated where there was no consumption.

1.2.2 CP1308 solution was one of two put forward in DCP0044. It was selected for progression to CP as it was chosen as the most favourable by the majority of respondents and has a lesser impact on Suppliers and Supplier Agents than the other solution. Please refer to the [DCP0044 form](#) and [DCP responses](#) for more details.

2 Proposed Solution

2.1 Where a reading has been obtained through entry via a warrant, the site should be removed from the LTV process as a read has been obtained. But the last valid read (i.e. the warrant read) should be used (rather than a deemed read) at the start of the next LTV period to avoid error entering Settlement.

2.2 The use of this solution in the case of warrant reads would be optional for Suppliers and would not require changes to Supplier Agent systems. Ascertaining where a site has fallen out of the process due to a warrant read being obtained would be down to the Supplier. For the avoidance of doubt this solution will not introduce a new read type for warrant reads.

2.3 If a Supplier identifies a site re-entering the LTV process having previously fallen out of the process due to a warrant read being obtained they can send a D0010 'Meter Readings' flow to the NHHDC containing the warrant read with a read date of the Effective From Date of the zero EAC. The NHHDC can then process this read in the normal way.

2.4 Please see attachment E for the full redline text changes.

3 Intended Benefits

3.1 The current process of deeming a read for the start date of the new LTV period will introduce error into Settlement, as energy will be allocated where there was no consumption. CP1308 would prevent this happening, by allowing the warrant read to be replicated at the start of the next LTV period.

4 Industry Views

4.1 We received 15 responses; of these 12 agreed, 1 disagreed and 2 were neutral.

- 4.2 One respondent disagreed with CP1308, because they believe that there would be impacts on Suppliers and Suppliers Agents systems, and that the cost of these changes cannot be justified by the volume of this issue.
- 4.3 We contacted the respondent and explained to them that the zero consumption can be flagged for manual review, and therefore we believe the CP1308 solution will not cause read failures in respondents NHHDC system.
- 4.4 The respondent was also concerned that the site may be occupied, and then not occupied again during the period from the warrant read. In this situation, they believe Settlement would be under-recording consumption.
- 4.5 We explained to the respondent that the situation stated above is possible, but in reality it is more likely that the site to be unoccupied throughout the period. Therefore CP1308 solution will provide more accurate reading in Settlement than the current requirements.
- 4.6 The respondent still disagrees with CP1308 and believes that the costs outweigh the benefits of making this change.

5 Impacts and Costs

- 5.1 Indicative impacts and costs received from participants were similar for all the LTV CPs.

| Market Participant | Cost/Impact | Implementation time needed |
|-----------------------|--|--|
| NHHDCs | <p>Most NHHDCs indicated that they will need to make changes to their processes if CP1308 is approved.</p> <p>Some indicated that they may also make some system changes.</p> | <p>Implementation timescales ranged from between 15WDs to 6 Months.</p> <p>All but 1 respondent believed that the February 2010 Release would be suitable.</p> <p>One respondent indicated that they would require 6 Months in order to implement the necessary changes.</p> |
| Suppliers | <p>Some Suppliers indicated that CP1308 would have minor impacts on their organisation.</p> <p>One Supplier indicated that they would need to make changes to their systems.</p> | As above. |
| ELEXON Implementation | The estimated ELEXON implementation cost is 1 man day, which equates to approximately £220. | February 2010 Release suitable |

6 Implementation Approach

- 6.1 We recommend that CP1308 be approved for the February 2010 Systems Release.
- 6.2 We note that one respondent does not believe they would be able to meet the proposed implementation date. The respondent has indicated that they are unable to meet the February Release that because they would need to make changes to their NHHDC and Supplier systems. Most NHHDCs have indicated that they do not need to make changes to their systems, or that they changes needed are very minor. We will discuss these

comments further with the respondent before the SVG meeting and provide a verbal update.

7 Recommendation

We recommend, because CP1308 will reduce the chance of energy being erroneously allocated to a site which is vacant (and where there is no consumption) and majority industry support, that you:

- **APPROVE** CP1308 for implementation in the February 2010 Release.

Lead Analyst: Bu-Ke Qian, tel. 0207 380 4146 or email buke.qian@elexon.co.uk.

Table 1: Industry Impact Assessment Summary for CP1308 - Changes to Long Term Vacant Site process where a reading is obtained via a warrant

| IA History CPC number | CPC00667 | Impacts | BSCP504 | |
|--|---|---------|---------|-------------------------------|
| Organisation | Capacity in which Organisation operates in | | Agree? | Days to Implement |
| Central Networks | LDSO | | Yes | -- |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | | Neutral | N/A |
| GTC | LDSO | | Neutral | -- |
| EDF Energy | Supplier, NHH Agents, HH MOP | | Yes | -- |
| IMServ Europe | HHDC, DA and MO NHHDC, DA and MO | | Yes | 30 |
| EDF Energy Networks (EPN, LPN, SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | | Yes | -- |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | | Yes | 90 |
| British Energy Direct Limited | Supplier | | Yes | -- |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | | Yes | 0 |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | | Yes | - |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | | Yes | 15 |
| E.ON | Supplier | | Yes | -- |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | | Yes | -- |
| E.ON Energy Services Limited | NHHDC MOA | | Yes | 90 |
| NPower Limited | Supplier, Supplier Agents | | No | 6 Months from Panel Agreement |

Table 2: Impact Assessment Responses

| Organisation | Agree? | Comments | Impacted? | ELEXON Response |
|---|---------|--|-----------|-----------------|
| Independent Power Networks Limited | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |
| GTC | Neutral | Impact on Organisation's Systems and/or Processes? No | No | - |
| EDF Energy | Yes | Impact on Organisation: We do not currently use this process so change will have no impact. | No | - |

| | | | | |
|--------------------------------------|-----|---|-----|--|
| IMServ Europe | Yes | <p>Comments: These are a sensible set of changes.</p> <p>Capacity in which Organisation is impacted NHHDC</p> <p>Impact on Organisation: Procedural changes only</p> <p>Implementation: 30</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> | Yes | - |
| G4S AccuRead | Yes | <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted NHHDC</p> <p>Impact on Organisation Changes in processing Warrant reads and Deemed LTV reads</p> <p>Implementation: 90 days</p> | Yes | - |
| British Energy Direct Limited | Yes | <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Would implementation in the proposed Release have an adverse impact? No. However, as the proposed DCP would be beneficial to us, would it be possible to implement it into the November 2009 Release?</p> | No | We contacted the respondent and highlighted that the next possible release would be February 2010, as the November 2009 release has now been closed to new changes. The respondent was happy with this response and highlighted that they believed that these changes would be extremely beneficial to their organisation. |
| Scottish Power | Yes | <p>Impact on Organisation's Systems and/or Processes? No</p> <p>Impact on Organisation? Document changes only</p> <p>Would implementation in the proposed Release have an adverse impact? No</p> <p>Other comments: The solution identified within CP1308, reflects the Scottish Power view in the response to DCP0044.</p> | No | - |
| Scottish and Southern Energy | Yes | <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted Supplier, NHHDC</p> <p>Impact on Organisation Minor procedural changes</p> | Yes | - |

| | | | | |
|------------------------------|-----|---|-----|---|
| E.ON | Yes | Capacity in which Organisation is impacted? Supplier / NHHDC Impact on Organisation? Systems / process | Yes | - |
| E.ON Energy Services Limited | Yes | Impact on Organisation's Systems and/or Processes? Yes Capacity in which Organisation is impacted NHHDC Impact on Organisation: Possible system changes or Manual How much Implementation Notification is required from receipt of approved redline text changes? No. of Calendar Days90 Comments Depending on clarification of below This change would be most efficient if the Supplier was able to send a withdrawn D10 reading to remove our deemed reading that is generated to start LTV and then replace with a relevant reading, failing this our system will need to be amended in some way to allow a D4 / D52 and replacement reading to be processed automatically on the same date. | Yes | We have spoken to the respondent and noted the solution. We asked the respondent whether he believes such change would require a BSCP change or discussion between Supplier and DC. The respondent agreed to talk to his colleague who looks after the NHHDC issues and would get back to us on 22 Sep 09. He iterated that an automated solution is Eon's preference due to the high consistency between parties. We will provide a verbal update on any further discussions at the SVG meeting. |
| NPower Limited | No | Comments: The rationale for the change proposal is based on the site being vacant in the period from the warrant read, and the date of the next D0004 (with the 02 SVCC). In reality, in that particular period, there is a possibility that the site could be 'occupied', then 'not occupied' (without the Supplier's knowledge). According to the change proposal, the previous warrant read would be used in settlement, rather than a deemed read (relating back to the date of the first D0004 SVCC 02). In this situation, settlements would be under-recording consumption used at site. To overcome the 'decision-making consideration' was the site occupied or not between the warrant read date and the date of the first D0004 SVCC 02, a different approach could be taken – by altering the | Yes | We believe that this is possible but more likely to be unoccupied throughout and so the solution proposed by CP1308 will provide more accurate reading in settlement than current requirements. |

| | | | | |
|--|--|--|--|--|
| | | <p>criteria for the end date for the Long Term Vacant Period.</p> <p>Currently 4.15.5 (2) states “where a meter reading has been obtained, the date that the meter reading was obtained should be used as the end date for the Long Term Vacant Period.”</p> <p>If during the warrant visit, it was considered that the site was vacant, then the warrant reading should not be used to end the Long Term Vacant period. (This could be entered as a footnote to 4.15.5 (2)).</p> <p>A ‘warrant read vacant premises’ meter reading type category could be introduced.</p> <p>Furthermore, additional action could be illustrated within the appendices to remove the fuse (that is, ‘de-energise’ the meter), which would add a further control to prevent any mis-recording within settlements.</p> <p>As per our response to DCP 44 the proposed solution would cause read failures in our NHHDC system (Zero Consumption Check). To rectify this, IS costs are likely to be significant due to the amount of regression testing required. There is no Business Justification for this Change Proposal as we believe the number of incidents where a warrant is obtained for access to a long term vacant site is very small.</p> <p>If this change was agreed there would be impacts on both Suppliers and Suppliers Agents resulting in</p> | | <p>We note that the suggested footnote would be similar to the other option in DCP44 (which was not the favoured option of the industry, and therefore not progressed to a CP).</p> <p>We think this is a more complex solution, but this could be achieved through DTC change.</p> <p>We note that this is a possible extension to the solution, but that it would be a material change to CP1308, which would be inappropriate at this stage of the assessment process. We believe that, should a Supplier consider it appropriate, there is nothing to prevent them de-energising a site in these circumstances.</p> <p>We believe that this situation is similar to a vacant site where can get readings. Also, the zero consumption could be flagged for manual review; therefore the proposed solution should not cause significant changes in the NHHDC system.</p> |
|--|--|--|--|--|

| | | | | |
|--|--|--|--|--|
| | | <p>system changes. We believe the cost of these changes cannot be justified by the volume of this issue</p> <p>Impact on Organisation's Systems and/or Processes? Yes</p> <p>Capacity in which Organisation is impacted: Supplier, NHHDC</p> <p>Impact on Organisation: System and Processes</p> <p>How much Implementation Notification is required from receipt of approved redline text changes? 6 Months from Panel Agreement</p> <p>Comments Due to the amount of regression testing and system impacts we would be unable to meet the February Release 2010 for this change.</p> <p>Would implementation in the proposed Release have an adverse impact? Yes</p> | | <p>We note that the respondent has indicated that they are unable to meet the February 2010 Release due the impacts on their NHHDC and Supplier systems.</p> <p>We have provided these comments to the respondent via email, and they have confirmed that they feel that their initial points still stand. We will discuss these comments with the respondent further and provide a verbal update at SVG should any new points be raised during this discussion.</p> |
|--|--|--|--|--|

We did not receive any comments on the redline text.

Appendix 6 – CP impact assessment timetable 2009/2010 consultation responses

| Organisation | Capacity in which Organisation operates in | Comments | Agree? |
|--|---|--|---------|
| Central Networks | LDSO | - | Yes |
| EDF Energy | Supplier, NHH Agents, HH MOP | - | Yes |
| IMServ Europe | HHDC, DA and MO NHHDC, DA and MO | - | Yes |
| EDF Energy Networks (EPN, LPN, SPN) EDF Energy (IDNO) Ltd | LDSO, SMRS, UMSO | - | Yes |
| G4S AccuRead | NHHDA, NHHDC, NHHMOP, HHMOP | - | Yes |
| ScottishPower | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | - | Yes |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | It is a good idea to include this within the monthly change pack as opposed to an ad-hoc nature in the past. | Yes |
| NORW, EELC, ENG, EMEB, PGEN | Supplier | - | Yes |
| Siemens Metering Services | NHHDC, NHHDA, NHHMO, HHDC, HHDA, HHMO | - | Yes |
| NPower Limited | Supplier, Supplier Agents | - | Yes |
| Independent Power Networks Limited | LDSO, UMSO, SMRA | - | Neutral |
| GTC | LDSO | - | Neutral |
| Gemserv | MRASCo Ltd | - | Neutral |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC, NHHDA | - | Neutral |

Appendix 7 – New Change Proposals

| CP | CVA/ SVA | Title | Description | Raised |
|--------|-------------|---|--|----------|
| CP1309 | SVA | Include reference to D0303 in BSCP514 and circumstances in which its use is mandatory | <p>British Gas raised CP1309.</p> <p>Changes in the provision of metering services to British Gas in 2010 will increase the number of entities that provide service to Meter Asset Provider (MAP) and Meter Asset Maintainer (MAM). There is a risk that the data available to the MAP being out of date will increase. This separation of MAM and MAP roles can be expected to become more widespread as smart metering is deployed.</p> <p>CP1309 proposes that the Meter Operator must send the D03034 to the MAP in some circumstances (except where the MOP and MAP are the same commercial entity). This change would be achieved through amending BSCP5145 to include reference to the D0303.</p> | 04/09/09 |
| CP1310 | SVA | Clarifications to Gross Volume Correction Process | <p>CP1310 is the first of three changes (1310, 1311 and 1312) raised following the work undertaken by the Gross Volume Correction Expert Group, which was set up by the SVG.</p> <p>CP1310 highlights that there are a number of areas where the BSCP5046 is not prescriptive enough, and that further clarity is needed.</p> <p>CP1310 proposes changes to BSCP504 to clarify how the principles should be applied in practice, and retains the original principles agreed by the Trading Stage 2 Committee.</p> | 04/09/09 |
| CP1311 | SVA | Replacing Erroneous Forward Looking EACs | <p>There is an existing process in the Code (S-2 4.3.17) and in BSCP504 (4.14.4.6) that allows an Estimated Annual Consumption (EAC) to be replaced by a representative value, but there are 3 problems with this process:</p> <ol style="list-style-type: none"> 1) Potential for inconsistent application of requirement 2) Applicability of EAC replacement 3) Manual process <p>CP1311 proposes mandating the replacement of all negative EACs with a class average EAC (or a more representative EAC, if available), leaving the replacement of positive EACs as an optional process. Changes to BSCP504 and the</p> | 04/09/09 |

⁴ D0303 - Notification of Meter Operator, Supplier and Metering Assets installed/removed by the MOP to the MAP

⁵ BSCP514 – ‘SVA Metering for Metering Systems Registered in SMRS’

⁶ BSCP504 – ‘Non-Half hourly Data Collection for SVA Metering Systems Registered in SMRS’

| CP | CVA/ SVA | Title | Description | Raised |
|--------|-------------|--|---|----------|
| | | | EAC/AA software would be required to support this solution. | |
| CP1312 | SVA | Use of Gross Volume Correction in Post Final Settlement Runs | <p>One of the features of GVC is an 'Error Freezing Reading'. BSCP504 only covers the application of this technique outside the Trading Disputes process.</p> <p>Previously, ELEXON has issued guidance to the effect that an 'Error Freezing Reading' may be deemed in the current Post Final Settlement Run (PFSR) window, in the event that the relevant Metering System is subject to a Trading Dispute (and a PFSR has been scheduled for the relevant GSP Group). However, the Trading Disputes Committee (TDC) has recently agreed that its preference is for 'Error Freezing Readings' to be deemed at the RF boundary in all circumstances, and not to allow these readings to be deemed at a PFSR.</p> <p>CP1312 proposes to amend Section 4.14 of BSCP504 to deliver the TDC's preferred solution.</p> | 04/09/09 |
| CP1313 | SVA | Remove ELEXON from the Minimum Eligible Amount (MEA) request process | <p>A Minimum Eligible Amount (MEA) is the amount of credit cover a Party needs to have lodged with the Funds Administration Agent (FAA).</p> <p>Parties can request to reduce the credit they have lodged by submitting a form (in BSCP3017) to ECVA. This is known as a MEA request.</p> <p>CP1313 seeks to amend the current MEA process, as including ELEXON in this process does not add value, and creates an inefficient process.</p> | 04/09/09 |

⁷ BSCP301 – 'Clearing, Invoicing and Payment'

Appendix 8 – Release Information

Key to Release Plan

Change Proposals and Modification Proposals in **BLACK** text represents SVA changes, **RED** text represents CVA changes and **BLUE** text represents changes which impact both the SVA and CVA arrangements.

| | |
|--|---|
| The Authority decision dates are provided in the following format: | |
| P | Modification Proposal number |
| (< date) | Date by which a determination must be made by the Authority in order for the Modification Proposal to be implemented within the indicated release |
| Pro✓/Pro✘ | Indicates that the Panel's recommendation to the Authority was to Approve/Reject the proposed Modification |
| Alt✓/Alt✘ | Indicates that the Panel's recommendation to the Authority was to Approve/Reject the Alternative Modification |

| | | Release Date | | | |
|-------------------------|----------|---|--|---|--|
| | | November 2009 Scope (Imp. Date 05 Nov 09) | February 2010 Scope (Imp. Date 25 Feb 10) | June 2010 Scope (Imp. Date 24 Jun 10) | Standalone Releases |
| Change Proposals | Pending | | 1267 v2.0, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313 | Currently there are no Change Proposals targeted at this Release. | There are currently no changes in a stand alone release. |
| | Approved | 1248 v2.0, 1269, 1275 v2.0, 1278 v2.0, 1281, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294 | 1295, 1296, 1297, 1298, 1299, 1301, 1302, 1303 | | |
| Modifications | Pending | P239 Pro✓ | Currently there are no Modifications targeted at this Release. | Currently there are no Modifications targeted at this Release. | |
| | Approved | P217 Alt✓, P223 Alt✓, P234 Pro✓, P231 Pro✓, P232 Alt✓ | | | |
| Updates | | November 2009 Release is currently progressing to time and quality. The ISG have approved all the Code Subsidiary Documents for P217. We are witnessing the testing of the P217 software changes to BMRA and SAA; and Operational Acceptance Testing and Participant Testing are scheduled to start in September. On 11 August 2009, ELEXON successfully ran a P223 implementation workshop for P223 to assist Suppliers with the implementation of the Modification. The new BSCP for P231 and P232 underwent a successful walkthrough and is now undergoing industry review. All changes for the November 09 Release will be implemented on 5 November 2009 with the exception of P223 which has an implementation date of 1 December 2009. | Planning for the February 2010 Release is scheduled to take place in September and October 2009. | | |

CP Scope of the November 2009 Release

| CP | Title | Impacts | BSC Agent (Demand Led) | ELEXON Operational | | Total |
|--------------------------|--|---|---------------------------|--------------------|----------------|-----------------|
| | | | | Man Days | Cost | |
| CP1248 v2.0 | Early release of Meter Technical Details by the Non Half Hourly Meter Operator Agent | BSCP514, BSCP533 Appendix A and BSCP533 Appendix B | £4,200 | 3 | £700 | £4,900 |
| CP1269 | Publication of Additional Non Half Hourly Combination Data in Market Domain Data | BSCP509, BSCP509 Appendix, SVA Data Catalogue Vol. 1 and Vol. 2 | £73,775 | 57 | £12,540 | £86,315 |
| CP1275 v2.0 | Supplier Agents – Access to Meter Protocols | CoP10, BSCP601 | £0 | 2.5 | £550 | £550 |
| CP1278 v2.0 | Streamlining the SVA Standing Data Change Process | BSCP507, BSCP537 Appendix 1 | £0 | 3.75 | £825 | £825 |
| CP1281 | Revenue Protection: requiring NHHDC to send EAC/AA data to the Supplier via the DTC. | BSCP504 | £0 | 1 | £220 | £220 |
| CP1283 | Revisions to data correction processes in BSCP18 | BSCP18, NETA IDD Part 2 | £1,365 | 2 | £440 | £1,805 |
| CP1284 | Ability for Third Parties to raise Change Proposals and replacement of energywatch with National Consumer Council | BSCP40, PrA Service Description, Teleswitch Agent Service description | £0 | 2.5 | £550 | £550 |
| CP1285 | Unmetered Supplies: Clarification of Central Management System requirements | BSCP520 | £0 | 1 | £220 | £220 |
| CP1286 | BSCP18 Operational Review: Additional flag in Transmission Company's BOAL file to indicate an amended Bid-Offer Acceptance | NETA IDD Part 2, BMRA URS, SAA URS | £0 | 2.5 | £550 | £550 |
| CP1287 | Correction of inconsistencies in BSCP536 'Supplier Charges' | BSCP536 | £1,998 | 3 | £660 | £2,658 |
| CP1288 | Revisions to Meter test points within Code of Practice 4 | CoP4 | £0 | 1.25 | £275 | £275 |
| CP1289 | Correction to the Level 4 password requirement in Code of Practice 2 | CoP2 | £0 | 1.25 | £275 | £275 |
| CP1290 | Rationalise and Simplify Unmetered Supplies requirements following a review by an Expert Group | BSCP520 | £0 | 3 | £660 | £660 |
| CP1291 | Clarify requirements on Meter Administrators relating to Equivalent Meters | BSCP520 | £0 | 2 | £440 | £440 |
| CP1292 | Clarify Meter Administrator requirements relating to PECU arrays | BSCP520 | £0 | 2.5 | £550 | £550 |
| CP1293 | Housekeeping changes to BSCP537 Appendix 1 – Self Assessment Document (SAD) | BSCP537 Appendix 1 | £0 | 0 | £0 | £0 |
| CP1294 | Housekeeping Change to SVA Data catalogue Volume 2 | SVA DC Vol. 2 | £0 | 0 | £0 | £0 |
| Total⁸ | | | £81,338 | 88.25 | £19,455 | £100,793 |

⁸ A Tolerance of 20% applies for both Demand Led costs and ELEXON Operational Costs

Draft CP Scope of the February 2010 Release

| CP | Title | Impacts | BSC Agent (Demand Led) | ELEXON Operational | | Total |
|--------------------------|---|--|---------------------------|--------------------|---------------|----------------|
| | | | | Man Days | Cost | |
| CP1295 | Process for distribution of MDD Updates not included in D0269/D0270 flows | BSCP505, BSCP508, SVA Data Catalogue Vol. 1 and Vol. 2 | £6,000 | 20 | £4,400 | £10,400 |
| CP1296 | Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 5 (CoP5) Meters | BSCP601, CoP5 | £0 | 2 | £440 | £440 |
| CP1297 | Mandatory Capability to Record Reactive Power Demand (kvar) Values in Code of Practice 10 (CoP10) Meters | BSCP601, CoP10 | £0 | 2 | £440 | £440 |
| CP1298 | Requirement on MOAs to Configure Meters to Record Half Hourly Reactive Power Data (for Half Hourly Settled CT-Metered Customers) | BSCP514 | £0 | 2 | £440 | £440 |
| CP1299 | Requirement on Half Hourly Data Collectors to Collect and Report Reactive Power Data (where the Meter is configured to record it) | BSCP502 | £0 | 2 | £440 | £440 |
| CP1301 | Registration Requirements for System Connection Points Between Onshore Distribution Systems and Offshore Transmission Systems | BSCP25, BSCP75 | £700 | 4 | £880 | £1,580 |
| CP1302 | Requirement on Half Hourly Data Collectors to Validate Reactive Power Demand Values | BSCP502 | £0 | 2 | £440 | £440 |
| CP1303 | Requirement on Half Hourly Data Collectors to Estimate Missing Reactive Power Demand Values | BSCP502 | £0 | 2 | £440 | £440 |
| Total⁹ | | | £6,700 | 36 | £7,920 | £14,620 |

⁹ A Tolerance of 20% applies for both Demand Led costs and ELEXON Operational Costs

CP1304 Attachment – REDLINE TEXT CHANGES TO BSCP504 V22.1

Section 1 to Section 4.14 are not be impacted by CP1304

4.15.3. Confirmation that the Site remains Long Term Vacant.

Where a Supplier has identified a site as Long Term Vacant and has instructed their NHHDC to enter a zero EAC into Settlement for that site, the Supplier must confirm that all of the following criteria have been met to continue treating the site as Long Term Vacant:

1. The Supplier must receive D0004s from the NHHDC with the J0024 data item populated with the 02 code at least once every seven calendar months for the Metering System; and
2. The Supplier must not have received a D0004 from the NHHDC with the J0024 data item populated with anything other than the following codes: 02 ~~code~~, 18 'Unsafe Premises', 19 'Call not made on routine visit', 20 'No access' or 28 'Unable to gain access due to insufficient address details'; and
3. The Supplier must not have received any data flows containing the J0040 'Register Readings' data item from the NHHDC; and
4. At least every seven calendar months, the Supplier must make further proactive attempts to identify the owner of the property in order to obtain a Meter Reading (examples of which are detailed in 4.15.1, criterion 4) or, if the owner is known, then the Supplier must continue to attempt to contact them to arrange a Meter Reading. Auditable records must be kept for all attempts to obtain a Meter Reading.

Section 4.15.4 – End of document are not be impacted by CP1304

CP1305 Attachment – REDLINE TEXT CHANGES TO BSCP504 V22.1

Section 1 to Section 3.3.12 are not be impacted by CP1305

3.3.13. Identification of Long Term Vacant Sites.

| REF | WHEN | ACTION | FROM | TO | INFORMATION REQUIRED | METHOD |
|----------|---|---|----------|----------------|---|---------------------------------------|
| 3.3.13.1 | Following receipt of second D0004 ⁷⁹ | Identification of site as Long Term Vacant in accordance with appendix 4.15.1 Establish start date for the Long Term Vacant period in accordance with appendix 4.15.2. | Supplier | | Appendix 4.15 - Identification of a site as Long Term Vacant. | Internal Process |
| 3.3.13.2 | Following 3.3.13.1 | Send notification of zero EAC for the site, where the Effective From Date shall be the start date for the period of Long Term Vacant treatment. | Supplier | NHHDC | D0052 Affirmation of Metering System Settlement Details. | Electronic or other method, as agreed |
| 3.3.13.3 | Within 10 WD of receipt of D0052 | Obtain Meter reading for the Effective From Date of zero EAC. If Meter Register Reading is not available, deem a Meter reading in accordance with Appendix 4.5.2 (q) | NHHDC | | Appendix 4.5 – Deemed Meter Advance. | Internal Process |
| 3.3.13.4 | If Meter reading is deemed | Send notification of deemed Meter reading for Effective From Date of zero EAC. | NHHDC | Supplier, LDSO | D0010 Meter Readings. | Electronic or other method, as agreed |
| 3.3.13.5 | Following 3.3.13.3 | Calculate AA up to the Effective From date of zero EAC. | NHHDC | | Appendix 4.9 - EAC/AA Calculation. | Internal Process |
| 3.3.13.6 | Following 3.3.13.5 | Send AA and the zero EAC. | NHHDC | NHHDA Supplier | D0019 Metering System EAC/AA Data. | Electronic or other method, as agreed |

⁷⁹D0004 'Notification of Failure to Obtain a Reading' with the J0024 data item populated with Site Visit Check Code 02 'Site not occupied' or populated with code 20 'No Access' with additional notes indicating the site to be Long Term Vacant.

| REF | WHEN | ACTION | FROM | TO | INFORMATION REQUIRED | METHOD |
|------------|---|--|-------------|-----------|--|-------------------------------------|
| 3.3.13.7 | On receipt of D0019 | Process Data in accordance with BSCP504 Section 3.5. | NHHDA | | D0019 Metering System EAC/AA Data. | Internal Process |
| 3.3.13.8 | On Request by LDSO ⁸⁰ | Send Details of Long Term Vacant Sites. | Supplier | LDSO | P0221 'Notification of Long Term Vacant Site'. | As agreed between Supplier and LDSO |
| 3.3.13.9 | At least every 7 months from identification or last confirmation of site as LTV | Confirm that site remains Long Term Vacant in accordance with Appendix 4.15.3. | Supplier | | Appendix 4.15.3 - Confirmation that the Site remains Long Term Vacant. | Internal Process |

Section 3.3.14 to Section 4.14 are not be impacted by CP1305

⁸⁰The timescales, the method of communicating the report, the format of the report and any extra details to be included should be agreed between the Supplier and LDSO.

4.15 Identification of a site as Long Term Vacant.

4.15.1. Criteria for identifying site as Long Term Vacant.

A Supplier may identify a site as Long Term Vacant if it meets all of the following five criteria:

1. The site is energised according to the Supplier Meter Registration Service (SMRS).
2. The NHHDC is unable to gain access to read the Meter.
3. The Supplier:
 - has received from the NHHDC at least two D0004 'Notification of Failure to Obtain a Reading' data flows, at least 3 calendar months apart and not more than 7 calendar months apart with the J0024 'Site Visit Check Code' data item populated with code 02 'Site not Occupied' or populated with code 20 'No Access' with additional notes indicating the site to be Long Term Vacant; and
 - has not received any D0004s with the J0024 data item populated with anything other than 02 or 20 with additional notes indicating the site to be Long Term Vacant in the interim; and
 - has not received any other data flows containing the J0040 'Register Reading' data item in the interim.

If a D0004 data flow is received with the J0024 data item unpopulated, it can be excluded for the purposes of this criterion.

4. The Supplier has made proactive attempts to identify the owner of the property to obtain a Meter reading; proactive attempts could include contacting bodies such as estate agents, letting agents, councils or the land registry to find out who the owner is. If the Supplier supplies both gas and electricity, check to see if the same issues are occurring for the gas supply.

When an owner is identified, attempts must then be made to contact them and obtain a reading.

The Supplier may have its own way of meeting this criterion.

5. If the owner is already known, the Supplier must make attempts to contact them to arrange a Meter Reading.

The Supplier must keep auditable records showing that all of these criteria have been met in order to identify a site as Long Term Vacant.

If all the above criteria have been met, but the Supplier has evidence of consumption on the Metering System, the site must not be identified as Long Term Vacant.

4.15.2. Start Date for the Long Term Vacant Period.

The Supplier should identify the start date for the Long Term Vacant period as the earlier of the following:

1. The date in the J0016 'Reading Date and Time' data item in the first D0004 received with the J0024 data item populated with code 02 or 20 with additional notes indicating the site to be Long Term Vacant; or
2. The date that a Customer closed the account provided that:
 - a) This is no more than seven calendar months before the date of the first D0004 with the J0024 data item populated with the 02 code or the 20 code with additional notes indicating the site to be Long Term Vacant; and
 - b) That no D0004s with the J0024 data item populated with anything other than the 02 code or the 20 code with additional notes indicating the site to be Long Term Vacant have been received between the date that the Customer closed the account and the date of the first D0004 with J0024 data item populated with code 02 or 20 with additional notes indicating the site to be Long Term Vacant; and
 - c) No data flows containing the J0040 'Register Reading' data item have been received between the date that the Customer closed the account and the date of the first D0004 with J0024 data item populated with code 02 or 20 with additional notes indicating the site to be Long Term Vacant.

4.15.3. Confirmation that the Site remains Long Term Vacant.

Where a Supplier has identified a site as Long Term Vacant and has instructed their NHHDC to enter a zero EAC into Settlement for that site, the Supplier must confirm that all of the following criteria have been met to continue treating the site as Long Term Vacant:

1. The Supplier must receive D0004s from the NHHDC with the J0024 data item populated with the 02 code or the 20 code with additional notes indicating the site to be Long Term Vacant at least once every seven calendar months for the Metering System; and
2. The Supplier must not have received a D0004 from the NHHDC with the J0024 data item populated with anything other than the 02

code or the 20 code with additional notes indicating the site to be Long Term Vacant; and

3. The Supplier must not have received any data flows containing the J0040 'Register Readings' data item from the NHHDC; and
4. At least every seven calendar months, the Supplier must make further proactive attempts to identify the owner of the property in order to obtain a Meter Reading (examples of which are detailed in 4.15.1, criterion 4) or, if the owner is known, then the Supplier must continue to attempt to contact them to arrange a Meter Reading. Auditable records must be kept for all attempts to obtain a Meter Reading.

4.15.4. Identification that a site no Longer Qualifies for Long Term Vacant Treatment.

A site will no longer qualify for Long Term Vacant Treatment if any of the following occur:

1. It has been longer than seven calendar months since the supplier has received a D0004 from the NHHDC with the code 02 or 20 with additional notes indicating the site to be Long Term Vacant in the J0024 data item.
2. The Supplier has not made any proactive attempts to try to find out who the owner of the property is and to obtain a Meter reading (examples of which are provided above) in the seven month period from the receipt of a D0004; or
3. The Supplier has received a D0004 with the J0024 data item populated with a code other than 02 or 20 with additional notes indicating the site to be Long Term Vacant; or
4. The Supplier is aware that there is consumption on site, including where the Supplier has found or been informed of the owner of the site and has been able to obtain a Meter reading. This would include where a change of tenancy event had occurred.

If any of the above occur, the Supplier must no longer treat the site as Long Term Vacant and must notify the NHHDC to enter a non-zero EAC into Settlement for the site in accordance with section 3.3.14.

In addition, the site would no longer qualify for Long Term Vacant treatment if the Supplier has received a data flow containing the J0040 'Register Readings' data item from the NHHDC, i.e. the NHHDC has obtained an actual Meter reading. In this scenario, the Supplier would not have to inform the NHHDC that the site no longer qualifies for Long Term Vacant treatment as this would have been identified by the NHHDC and the NHHDC would have already processed this accordingly.

4.15.5. End Date for the Long Term Vacant Period.

If the Supplier identifies that the site no longer qualifies for Long Term Vacant treatment it should determine the end date of the Long Term Vacant period as follows:

1. Where there has been a change of tenancy, then the date of the change of tenancy should be used as the end date for the Long Term Vacant period;
2. Where a Meter reading has been obtained, the date that the Meter reading was obtained should be used as the end date for the Long Term Vacant period.
3. Where no Meter reading has been obtained (i.e. the Supplier has received a D0004 with the J0024 data item populated with something other than 02 or 20 with additional notes indicating the site to be Long Term Vacant) then the date of the last D0004 with the J0024 data item populated with 02 or 20 with additional notes indicating the site to be Long Term Vacant would be used as the end date for the Long Term Vacant period.
4. Where the Supplier has not attempted to read the Meter or make proactive attempts to find out the owner of the premises and obtain entry to take a Meter reading, then the date of the D0004 with the J0024 data item populated with 02 or 20 with additional notes indicating the site to be Long Term Vacant received the last time that the Supplier had made attempts to read the Meter and make proactive attempts to find out the owner of the premises would be used as the end date for the Long Term Vacant period.

If the Supplier does not have a Meter reading for the end of the Long Term Vacant period then the Effective From date for the non-zero EAC would be the day after the end date of the Long Term Vacant period.

Section 4.16 – End of document will not be impacted by CP1305



CP1306 Attachment – REDLINE TEXT CHANGES TO BSCP504 V22.1

Section 1 to Section 4.14 are not be impacted by CP1306

4.15 Identification of a site as Long Term Vacant.

4.15.1. Criteria for identifying site as Long Term Vacant.

A Supplier may identify a site as Long Term Vacant if it meets all of the following ~~four~~^{five} criteria:

1. The site is energised according to the Supplier Meter Registration Service (SMRS).

~~2. The NHHDC is unable to gain access to read the Meter.~~

~~3~~². The Supplier:

- has received from the NHHDC at least two D0004 ‘Notification of Failure to Obtain a Reading’ data flows, at least 3 calendar months apart and not more than 7 calendar months apart with the J0024 ‘Site Visit Check Code’ data item populated with code 02 ‘Site not Occupied’; and
- has not received any D0004s with the J0024 data item populated with anything other than 02 in the interim; and
- has not received any other data flows containing the J0040 ‘Register Reading’ data item in the interim.

If a D0004 data flow is received with the J0024 data item unpopulated, it can be excluded for the purposes of this criterion.

~~4~~³. The Supplier has made proactive attempts to identify the owner of the property to obtain a Meter reading; proactive attempts could include contacting bodies such as estate agents, letting agents, councils or the land registry to find out who the owner is. If the Supplier supplies both gas and electricity, check to see if the same issues are occurring for the gas supply.

When an owner is identified, attempts must then be made to contact them and obtain a reading.

The Supplier may have its own way of meeting this criterion.

~~5~~⁴. If the owner is already known, the Supplier must make attempts to contact them to arrange a Meter Reading.

The Supplier must keep auditable records showing that all of these criteria have been met in order to identify a site as Long Term Vacant.

If all the above criteria have been met, but the Supplier has evidence of consumption on the Metering System, the site must not be identified as Long Term Vacant.

Section 4.15.2 – End of document are not be impacted by CP1306



CP1307 Attachment – REDLINE TEXT CHANGES TO BSCP504 V22.1

Section 1 to Section 3.3.8.3 will not be impacted by CP1307

3.3.8. Withdrawing Meter Readings.¹

CP1307 will add a new scenario where a Meter reading can be withdrawn as follows:

3.3.8.4 Withdrawal of initial Long Term Vacant Period Meter Reading².

| <u>REF</u> | <u>WHEN</u> | <u>ACTION</u> | <u>FROM</u> | <u>TO</u> | <u>INFORMATION REQUIRED</u> | <u>METHOD</u> |
|------------------|--|--|------------------|---------------|---|------------------------|
| <u>3.3.8.4.1</u> | <u>If actual Meter register reading(s) taken at the end of a Long Term Vacant period indicates that the deemed initial Meter³ reading(s) for the Long Term Vacant Period was incorrect.</u> | <u>Send notification that the deemed initial Meter register reading(s) at the start of the Long Term Vacant period is incorrect.</u> <u>Instruct whether or not to replace the withdrawn reading with the reading taken at the end of the Long Term Vacant Period, in accordance with Appendix 4.5.</u> | <u>Supplier.</u> | <u>NHHDC.</u> | <u>Details of the Meter register reading(s) to be withdrawn</u> <u>Appendix 4.5 – Deemed Meter Advance</u> | <u>Manual Process.</u> |

¹ When a fault is reported by the MOA, the collection timetable will be updated in time to ensure that faulty data is not collected and passed into the Settlement process. Following resolution of the fault, the data collection timetable will be updated to ensure that actual data is collected within the collection period for the SVA MS.

² Suppliers shall have the choice on whether or not they wish their NHHDC to follow this process and withdraw the Meter reading.

³ The initial Meter reading at the start of the Long Term Vacant period to be withdrawn must not have passed the Final Reconciliation Run.

| <u>REF</u> | <u>WHEN</u> | <u>ACTION</u> | <u>FROM</u> | <u>TO</u> | <u>INFORMATION REQUIRED</u> | <u>METHOD</u> |
|------------------|--|---|------------------------------------|-------------------------|---|---|
| <u>3.3.8.4.2</u> | <u>By 5 WD after 3.3.8.4.1.</u> | <u>Withdraw the Meter register reading(s) and the associated EAC/AA(s).</u> <u>If last Meter reading was prior to RF, deem a Meter reading at RF in accordance with Appendix 4.5.</u> <u>If required enter the Meter reading taken at the end of the Long Term Vacant Period as the reading for the start of the Long Term Vacant Period in accordance with Appendix 4.5.</u> | <u>NHHDC.</u> | | <u>Appendix 4.5 – Deemed Meter Advance</u> | <u>Internal Process.</u> |
| <u>3.3.8.4.3</u> | <u>By 1 WD after 3.3.8.4.2</u> | <u>Send notification that Meter register reading(s) /EAC/AA(s) has been withdrawn.</u> | <u>NHHDC.</u> | <u>Supplier, LDSO.</u> | <u>D0010 Meter Readings.</u> | <u>Electronic or other method, as agreed.</u> |
| <u>3.3.8.4.4</u> | <u>If appropriate, and by 1 WD after 3.3.8.4.2</u> | <u>Send notification that the Meter register reading taken at the end of the Long Term Vacant Period is being used as the Meter reading at the start of the Long Term Vacant Period.</u> | <u>NHHDC</u> | <u>Supplier, LDSO</u> | <u>D0010 Meter Readings</u> | <u>Electronic or other method as agreed</u> |
| <u>3.3.8.4.5</u> | <u>By 1 WD after 3.3.8.4.3 and 3.3.8.4.4.</u> | <u>Send the EAC/AA (in accordance with Appendix 4.9).</u> <u>Process EAC/AA data in accordance with section 3.5.</u> | <u>NHHDC.</u> <u>NHHDA.</u> | <u>Supplier, NHHDA.</u> | <u>Appendix 4.9 - EAC/AA Calculation.</u> <u>D0019 Metering System EAC/AA Data.</u> <u>If Gross Volume Correction is required, refer to section 3.4.4</u> | <u>Electronic or other method, as agreed.</u> |

Section 3.3.9 to Section 4.5.1 will not be impacted by CP1307

4.5.2 Deeming circumstances

q) Long Term Vacant Sites

Commencement of treatment of site as Long Term Vacant:

Where a Supplier has sent the NHHDC a D0052 “Affirmation of Metering System Settlement Details” containing a zero EAC, the NHHDC must deem a reading for the date of the change of EAC if they do not have a valid Meter reading available for this date. This should be calculated using the following variables:

- Meter reading: the last valid Meter reading taken (or if not available, deemed).
- Applicable EAC/AA for calculation of Deemed Meter Advance: the last valid EAC.
- Deemed Meter Advance Period: starting on the date of the last valid Meter reading and ending on the day before the date of the change in value of the EAC.

The NHHDC shall determine the AA for the Metering System prior to the change in EAC value in accordance with section 3.3.11 and should provide this AA and the zero EAC with corresponding Effective From Settlement Dates and Effective To Settlement Date (of the AA) to the NHHDA and Supplier.

If a Meter reading taken at the end of the Long Term Vacant Period indicates that the initial deemed reading was incorrect and is withdrawn³ in accordance with section 3.3.8.4, a new initial reading can be entered using the Meter reading taken at the end of the Long Term Vacant Period as the reading for the start of the Long Term Vacant Period.

The NHHDC shall determine the AA for the Metering System prior to the start of the Long Term Vacant Period in accordance with section 3.3.11 and should provide this AA and the AA for the Long Term Vacant period with corresponding Effective From Settlement Dates and Effective To Settlement Dates to the NHHDA and Supplier.

End of treatment of site as Long Term Vacant:

Where a Supplier has sent the NHHDC a D0052 containing a non-zero EAC for a Metering System that previously had a zero EAC associated with it, the NHHDC must deem a reading for the date of the change of EAC if they do not have a Meter reading available for this date. This should be calculated using the following variables:

- Meter reading: the Meter reading taken or deemed when the zero EAC was entered into Settlement

- Applicable EAC/AA for calculation of Deemed Meter Advance: the last Valid EAC (i.e. zero EAC)
- Deemed Meter Advance Period: starting on the day when the zero EAC was entered into Settlement and ending on the day before the date of the change in value of the EAC from zero to non-zero.

The NHHDC shall determine the AA for the Metering System prior to the change in EAC value from zero to non-zero in accordance with section 3.3.11 and should provide this AA and the new EAC provided by the Supplier with corresponding Effective From Settlement Dates and Effective To Settlement Date (of the AA) to the NHHDA. The D0019 containing this information should also be sent to the Supplier.

Section 4.5.3 to Section 4.14 will not be impacted by CP1307

| | | |
|--|-------------|-----------------------|
| Version 0.5 of the redlining for CP1307 v1.0, extract taken from BSCP504 v22.1 | | v.0.5 |
| 5 June 2009 | Page 4 of 8 | © ELEXON Limited 2009 |

4.15 Identification of a site as Long Term Vacant.

4.15.1. Criteria for identifying site as Long Term Vacant.

A Supplier may identify a site as Long Term Vacant if it meets all of the following five criteria:

1. The site is energised according to the Supplier Meter Registration Service (SMRS).
2. The NHHDC is unable to gain access to read the Meter.
3. The Supplier:
 - has received from the NHHDC at least two D0004 'Notification of Failure to Obtain a Reading' data flows, at least 3 calendar months apart and not more than 7 calendar months apart with the J0024 'Site Visit Check Code' data item populated with code 02 'Site not Occupied'; and
 - has not received any D0004s with the J0024 data item populated with anything other than 02 in the interim; and
 - has not received any ~~Meter register readings for that Metering System in the interim~~ other data flows containing the J0040 'Register Reading' data item in the interim.

If a D0004 data flow is received with the J0024 data item unpopulated, it can be excluded for the purposes of this criterion.

4. The Supplier has made proactive attempts to identify the owner of the property to obtain a Meter reading; proactive attempts could include contacting bodies such as estate agents, letting agents, councils or the land registry to find out who the owner is. If the Supplier supplies both gas and electricity, check to see if the same issues are occurring for the gas supply.

When an owner is identified, attempts must then be made to contact them and obtain a reading.

The Supplier may have its own way of meeting this criterion.

5. If the owner is already known, the Supplier must make attempts to contact them to arrange a Meter Reading.

The Supplier must keep auditable records showing that all of these criteria have been met in order to identify a site as Long Term Vacant.

If all the above criteria have been met, but the Supplier has evidence of consumption on the Metering System, the site must not be identified as Long Term Vacant.

4.15.2. Start Date for the Long Term Vacant Period.

| | | |
|--|-------------|-----------------------|
| Version 0.5 of the redlining for CP1307 v1.0, extract taken from BSCP504 v22.1 | v.0.5 | |
| 5 June 2009 | Page 5 of 8 | © ELEXON Limited 2009 |

The Supplier should identify the start date for the Long Term Vacant period as the earlier of the following:

1. The date in the J0016 'Reading Date and Time' data item in the first D0004 received with the J0024 data item populated with code 02; or
2. The date that a Customer closed the account provided that:
 - a) This is no more than seven calendar months before the date of the first D0004 with the J0024 data item populated with the 02 code; and
 - b) That no D0004s with the J0024 data item populated with anything other than the 02 code have been received between the date that the Customer closed the account and the date of the first D0004 with J0024 data item populated with code 02; and
 - c) No Meter register readings for that Metering System ~~No data flows containing the J0040 'Register Reading' data item~~ have been received between the date that the Customer closed the account and the date of the first D0004 with J0024 data item populated with code 02.

4.15.3. Confirmation that the Site remains Long Term Vacant.

Where a Supplier has identified a site as Long Term Vacant and has instructed their NHHDC to enter a zero EAC into Settlement for that site, the Supplier must confirm that all of the following criteria have been met to continue treating the site as Long Term Vacant:

1. The Supplier must receive D0004s from the NHHDC with the J0024 data item populated with the 02 code at least once every seven calendar months for the Metering System; and
2. The Supplier must not have received a D0004 from the NHHDC with the J0024 data item populated with anything other than the 02 code; and
3. The Supplier must not have received any Meter register readings for that Metering System in the interim ~~data flows containing the J0040 'Register Readings' data item from the NHHDC~~; and
4. At least every seven calendar months, the Supplier must make further proactive attempts to identify the owner of the property in order to obtain a Meter Reading (examples of which are detailed in 4.15.1, criterion 4) or, if the owner is known, then the Supplier must continue to attempt to contact them to arrange a Meter Reading. Auditable records must be kept for all attempts to obtain a Meter Reading.

4.15.4. Identification that a site no Longer Qualifies for Long Term Vacant Treatment.

A site will no longer qualify for Long Term Vacant Treatment if any of the following occur:

1. It has been longer than seven calendar months since the ~~S~~upplier has received a D0004 from the NHHDC with the code 02 in the J0024 data item.
2. The Supplier has not made any proactive attempts to try to find out who the owner of the property is and to obtain a Meter reading (examples of which are provided above) in the seven month period from the receipt of a D0004; or
3. The Supplier has received a D0004 with the J0024 data item populated with a code other than 02; or
4. The Supplier is aware that there is consumption on site, including where the Supplier has found or been informed of the owner of the site and has been able to obtain a Meter reading. This would include where a change of tenancy event had occurred.

If any of the above occur, the Supplier must no longer treat the site as Long Term Vacant and must notify the NHHDC to enter a non-zero EAC into Settlement for the site in accordance with section 3.3.14.

In addition, the site would no longer qualify for Long Term Vacant treatment if the Supplier has ~~received a data flow containing the J0040 'Register Readings' data item from the NHHDC, i.e. the NHHDC has~~ obtained an actual Meter reading. In this scenario, the Supplier would not have to inform the NHHDC that the site no longer qualifies for Long Term Vacant treatment as this would have either been identified by the NHHDC and the NHHDC would have already processed this Meter reading accordingly or the Supplier would have passed the Meter register reading to the NHHDC in accordance with 3.4.1.1.

4.15.5. End Date for the Long Term Vacant Period.

If the Supplier identifies that the site no longer qualifies for Long Term Vacant treatment it should determine the end date of the Long Term Vacant period as follows:

1. Where there has been a change of tenancy, then the date of the change of tenancy should be used as the end date for the Long Term Vacant period;
2. Where a Meter reading has been obtained, the day before the date that the Meter reading was obtained should be used as the end date for the Long Term Vacant period.
3. Where no Meter reading has been obtained (i.e. the Supplier has received a D0004 with the J0024 data item populated with something other than 02)

then the date of the last D0004 with the J0024 data item populated with 02 would be used as the end date for the Long Term Vacant period.

4. Where the Supplier has not attempted to read the Meter or make proactive attempts to find out the owner of the premises and obtain entry to take a Meter reading, then the date of the D0004 with the J0024 data item populated with 02 received the last time that the Supplier had made attempts to read the Meter and make proactive attempts to find out the owner of the premises would be used as the end date for the Long Term Vacant period.

If the Supplier does not have a Meter reading for the end of the Long Term Vacant period then the Effective From date for the non-zero EAC would be the day after the end date of the Long Term Vacant period.

Section 4.16 – End of document will not be impacted by CP1307



CP1308 Attachment – BSCP504 v22.1 Redline Text v0.2

Section 1 – 3.3.12 no changes

Section 3.3.13. Identification of Long Term Vacant Sites.

| REF | WHEN | ACTION | FROM | TO | INFORMATION REQUIRED | METHOD |
|----------|--|---|----------|----|---|------------------|
| 3.3.13.1 | Following receipt of second D0004 ¹ . | Identification of site as Long Term Vacant in accordance with appendix 4.15.1 Establish start date for the Long Term Vacant period in accordance with appendix 4.15.2. | Supplier | | Appendix 4.15 - Identification of a site as Long Term Vacant. | Internal Process |

¹D0004 'Notification of Failure to Obtain a Reading' with the J0024 data item populated with Site Visit Check Code 02 'Site not occupied'.

| REF | WHEN | ACTION | FROM | TO | INFORMATION REQUIRED | METHOD |
|----------|----------------------------------|--|----------|----------------|---|---------------------------------------|
| 3.3.13.2 | Following 3.3.13.1 | Send notification of zero EAC for the site, where the Effective From Date shall be the start date for the period of Long Term Vacant treatment. <u>Send reading obtained through entry via a warrant if appropriate² with a read date of the Effective From Date of the zero EAC</u> | Supplier | NHHDC | D0052 Affirmation of Metering System Settlement Details. <u>D0010 Meter Readings</u> | Electronic or other method, as agreed |
| 3.3.13.3 | Within 10 WD of receipt of D0052 | Obtain Meter reading for the Effective From Date of zero EAC. If Meter Register Reading is not available, deem a Meter reading in accordance with Appendix 4.5.2 (q) | NHHDC | | Appendix 4.5 – Deemed Meter Advance. | Internal Process |
| 3.3.13.4 | If Meter reading is deemed | Send notification of deemed Meter reading for Effective From Date of zero EAC. | NHHDC | Supplier, LDSO | D0010 Meter Readings. | Electronic or other method, as agreed |

² This is an optional process step which can be followed if the Supplier identifies a site re-entering the LTV process having previously fallen out of the process due to a warrant read being obtained

| REF | WHEN | ACTION | FROM | TO | INFORMATION REQUIRED | METHOD |
|----------|---|--|----------|----------------|--|---------------------------------------|
| 3.3.13.5 | Following 3.3.13.3 | Calculate AA up to the Effective From date of zero EAC. | NHHDC | | Appendix 4.9 - EAC/AA Calculation. | Internal Process |
| 3.3.13.6 | Following 3.3.13.5 | Send AA and the zero EAC. | NHHDC | NHHDA Supplier | D0019 Metering System EAC/AA Data. | Electronic or other method, as agreed |
| 3.3.13.7 | On receipt of D0019 | Process Data in accordance with BSCP504 Section 3.5. | NHHDA | | D0019 Metering System EAC/AA Data. | Internal Process |
| 3.3.13.8 | On Request by LDSO ³ | Send Details of Long Term Vacant Sites. | Supplier | LDSO | P0221 'Notification of Long Term Vacant Site'. | As agreed between Supplier and LDSO |
| 3.3.13.9 | At least every 7 months from identification or last confirmation of site as LTV | Confirm that site remains Long Term Vacant in accordance with Appendix 4.15.3. | Supplier | | Appendix 4.15.3 - Confirmation that the Site remains Long Term Vacant. | Internal Process |

Section 3.3.14 – Section 4 no changes

³ The timescales, the method of communicating the report, the format of the report and any extra details to be included should be agreed between the Supplier and LDSO.












Attachment F - CP1304 to CP1308 Document Impact Matrix

| Change Proposal | BSCP504 Impact |
|--|--|
| 1304 | 4.15.3 Point (2) * |
| 1305 | 3.3.13.1 – Footnote 80 4.15.1 – Point (3) 4.15.2 – Points (1) and (2) 4.15.3 – Points (1) and (2) * 4.15.4 – Points (1) and (3) 4.15.5 – Points (3) and (4) |
| 1306 | Section 4.15.1 (2) |
| 1307 | Sections 4.15.1, 4.15.2, 4.15.3, 4.15.4 and 4.15.5 New Process in section 3.3.8 and consequential changes to 4.5 |
| 1308 | Section 3.3.13.2 new action for Supplier and new information required by the NNHDC |
| * The redline changes for CP1304 and CP1305 both impact on section 4.15.3 Point (2). We recommend that if both CPs are approved then the redlining for CP1304 should be used for section 4.15.3 (2). We believe that this will fulfil the requirements of both CP1304 and CP1305 and align with the intention of the review group. The group’s rationale was that they did not want a site to fall out of the LTV process if it did not receive a 20 code with additional information filled in. They believed that if this occurred it would not align with the principle of CP1304 | |

Change Proposal Impact Assessment Timetable 2009 – 2010

| Submission deadline of DCPs/CPs for next CPC batch | Monthly CPC batch to be Issued | IA to be Returned | IA responses published | ISG meeting paper day | SVG meeting paper day | ISG Meeting | SVG Meeting | Committee decisions published |
|--|--------------------------------|-------------------|------------------------|-----------------------|-----------------------|-------------|-------------|-------------------------------|
| 23-Oct-2009 | 30-Oct-2009 | 26-Nov-2009 | 03-Dec-2009 | 14-Dec-2009 | 23-Dec-2009 | 22-Dec-2009 | 05-Jan-2010 | 12-Jan-2010 |
| 20-Nov-2009 | 27-Nov-2009 | 17-Dec-2009 | 24-Dec-2009 | 18-Jan-2010 | 25-Jan-2010 | 26-Jan-2010 | 02-Feb-2010 | 09-Feb-2010 |
| 31-Dec-2009 | 08-Jan-2010 | 28-Jan-2010 | 04-Feb-2010 | 15-Feb-2010 | 22-Feb-2010 | 23-Feb-2010 | 02-Mar-2010 | 09-Mar-2010 |
| 22-Jan-2010 | 29-Jan-2010 | 25-Feb-2010 | 04-Mar-2010 | 15-Mar-2010 | 22-Mar-2010 | 23-Mar-2010 | 30-Mar-2010 | 06-Apr-2010 |
| 19-Feb-2010 | 26-Feb-2010 | 01-Apr-2010 | 08-Apr-2010 | 19-Apr-2010 | 26-Apr-2010 | 27-Apr-2010 | 04-May-2010 | 11-May-2010 |
| 01-Apr-2010 | 09-Apr-2010 | 29-Apr-2010 | 06-May-2010 | 17-May-2010 | 24-May-2010 | 25-May-2010 | 01-Jun-2010 | 08-Jun-2010 |
| 23-Apr-2010 | 30-Apr-2010 | 27-May-2010 | 03-Jun-2010 | 14-Jun-2010 | 21-Jun-2010 | 22-Jun-2010 | 29-Jun-2010 | 06-Jul-2010 |
| 21-May-2010 | 28-May-2010 | 01-Jul-2010 | 08-Jul-2010 | 19-Jul-2010 | 26-Jul-2010 | 27-Jul-2010 | 03-Aug-2010 | 10-Aug-2010 |
| 25-Jun-2010 | 02-Jul-2010 | 29-Jul-2010 | 05-Aug-2010 | 16-Aug-2010 | 23-Aug-2010 | 24-Aug-2010 | 31-Aug-2010 | 07-Sep-2010 |
| 30-Jul-2010 | 06-Aug-2010 | 02-Sep-2010 | 09-Sep-2010 | 20-Sep-2010 | 27-Sep-2010 | 28-Sep-2010 | 05-Oct-2010 | 12-Oct-2010 |
| 27-Aug-2010 | 03-Sep-2010 | 30-Sep-2010 | 07-Oct-2010 | 18-Oct-2010 | 25-Oct-2010 | 26-Oct-2010 | 02-Nov-2010 | 09-Nov-2010 |
| 24-Sep-2010 | 01-Oct-2010 | 28-Oct-2010 | 04-Nov-2010 | 15-Nov-2010 | 22-Nov-2010 | 23-Nov-2010 | 30-Nov-2010 | 07-Dec-2010 |

Key

| | | | | | |
|---|---|---|--|---|---|
|  | Cut-off for the submission of DCPs for June 10 Release* |  | Cut-off for the submission of CPs for June 10 Release* |  | Scope of June 10 Release finalised and closed |
|  | Cut-off for the submission of DCPs for Nov 10 Release* |  | Cut-off for the submission of CPs for Nov 10 Release* |  | Scope of Nov 10 Release finalised and closed |
|  | Cut-off for the submission of DCPs for February 11 Release* |  | Cut-off for the submission of CPs for February 11 Release* |  | Scope of Feb 11 Release finalised and closed |

* **Please note** that the dates indicated are based on document only changes and, due to the varying size and scope of CPs, ELEXON cannot guarantee that a change submitted by these cut-off dates will be included in the requested Release.



Attachment H: Amendments to the Profile Administrator Service Description

3 DETAILED REQUIREMENTS FOR DATA COLLECTION

The Profile Administrator shall ensure that there exists a Load Research sample, shall ensure that this sample is of the requisite size as directed by BSCCo, and shall ensure that data recorded at these Sample Participant premises is collected not less than once each year. The Profile Administrator shall also be responsible for ensuring the development and planning of the sample.

~~3.1.1~~ BSCCo shall specify from time to time the requisite sample size in accordance with BSCP510.

~~3.2~~ **3.2 Sampling Specification**

~~3.1.1~~ ~~3.2.1~~ The Profile Administrator shall design and operate the Load Research Programme so that the sample of Sample Participants is created and maintained which:

The correct redlined text should be:

3 DETAILED REQUIREMENTS FOR DATA COLLECTION

The Profile Administrator shall ensure that there exists a Load Research sample, shall ensure that this sample is of the requisite size as directed by BSCCo, and shall ensure that data recorded at these Sample Participant premises is collected not less than once each year. The Profile Administrator shall also be responsible for ensuring the development and planning of the sample.

~~3.1.1~~ BSCCo shall specify from time to time the requisite sample size in accordance with BSCP510.

3.1 Sampling Specification

3.1.1 The Profile Administrator shall design and operate the Load Research Programme so that the sample of Sample Participants is created and maintained which: