

## **CPC00673 – Impact Assessment Responses for CP1320**

### **CP1320 – 'Replacement of erroneous Change of Supplier Readings'**

#### Summary of Responses

<b>Organisation</b>	<b>Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)</b>	<b>Agreement Yes/No</b>	<b>Days Required to Implement</b>
Stark Software International Ltd	HHDC/NHHDC/HHDA/NHHDA/NHHDR	Neutral	90
E.ON UK Energy Services Limited	MOA NHHDC-DA	Neutral	--
EDF Energy	Supplier, NHH Agent and HH MOP	No	540
Gemserv	MRASCo Ltd	Yes	See Comments
SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	180
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd; SSE Metering Ltd	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
British Energy	Supplier	No	-
British Gas	Supplier	Yes	5
npower	Supplier / Supplier Agents	Yes	-

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
<b>Stark Software International Ltd</b>	Neutral	<b>Capacity in which Organisation is impacted:</b> NHHDC <b>Impact on Organisation:</b> Procedures <b>Adverse impact?</b> No	-
<b>E.ON UK Energy Services Limited</b>	Neutral	<b>Capacity in which Organisation is impacted:</b> This change will not have a direct impact on our activities	No
<b>EDF Energy</b>	No	<p><b>Comment:</b> This change shows a lack of understanding of how Suppliers might have implemented MAP 08 and problems that such a change would bring. We do feel that current process could do with some improvement be we feel that this is from point of view of DCs dealing with D0300s in a consistent and appropriate manner. This CP would ruin our automation of disputed reads process leading to additional manual processes and costs. It does however raise fundamental issues about how this process should work and specifically with regard to amending any reading for settlements and possible ambiguity in both MAP 08 and BSCP 504. Statement in MAP 08 as noted in this change proposal is not as clear as it could be, see below:</p> <p><i>Twelve months have not passed since the Supply Start Date (SSD) for the disputed MROCoS. Disputes greater than twelve months should be resolved by bi lateral agreement outside settlements</i></p> <p>We think a better statement would be:</p> <p><i>Twelve months have not passed since the Supply Start Date (SSD) for the disputed MROCoS. Disputes greater than twelve months should be resolved by bi lateral agreement between Suppliers outside processes detailed in this MAP.</i></p> <p>This would leave open ability for Suppliers to amend settlements where disputes are greater than twelve months old but not by using any part of MAP 08 processes. BSCP 504 is also felt to be unhelpful in managing MAP 08 process as the following:</p>	Yes

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		<p><i>If the change of Supplier reading has crystallised, then the Change of Supplier reading shall not be altered without the support of an upheld Trading Query or Trading Dispute</i></p> <p>is confusing when taken in context of a MAP 08 dispute. For example, when an agreed D0300 is sent to DC that DC has no idea when dispute was triggered so should make no judgment on if that read should be rejected, unless reading date has crystallised. This is what we feel is intent of above but it is not clear enough to be unambiguous. We think that this should be amended as follows:</p> <p><i>On receipt of a D0300 agreed read then DC should use this to amend change of Supplier reading unless that reading has crystallised or other data is problematic. For the avoidance of doubt a DC cannot reject a reading that is over 12 months old unless it has crystallised as they have no knowledge of when that dispute was raised and by providing such a read a Supplier is informing them that this reading is part of a valid dispute process as detailed under MAP 08.</i></p> <p>Elxon's current proposal would mean a complete mess for current MAP 08 processes as any dispute initiated that is over 12 months old is currently automatically rejected. If this change is passed all of these would need to be manually examined with time taken in talking to other Suppliers to find out if they really want to dispute a greater than 12 month old dispute. If not Suppliers would have to consider just removing this rejection reason and processing all of these but then having a different end process to deal with settlement aspects. Either way it would cause significant issues for little benefit.</p> <p><b>Capacity in which Organisation is impacted:</b> Supply  <b>Impact on Organisation:</b> system changes and processes would be required  <b>Number of calendar days comment:</b> We would need an 18 month lead time to amend MAP 08 processes due to other amendments currently being</p>	

Organisation	Agreement Yes/No	Comments	Impact Yes/No
		<p>made to our Supply systems and the complexity of de-threading current automated processes.</p> <p><b>Adverse impact:</b> There is absolutely no way that a fundamental change to MAP 08 could be made by that time.</p> <p><b>Any other comments:</b> We would support a clarification of current wording in both MAP 08 and BSCP 504. However, we are fundamentally opposed to MAP 08 process being used for any dispute that is initiated over 12 months in the past. Suppliers and their agents should manage this outside such processes and use current trading dispute if they wish to impact settlements.</p> <p>We feel that any amendment to MAP 08 process as defined in this change is fundamentally flawed in its logic and must be rejected due to problems it will introduce.</p>	
<b>Gemserv</b>	Yes	<p><b>Capacity in which Organisation is impacted:</b> Code Governance - MRA</p> <p><b>Impact on Organisation:</b> This will necessitate a change to MAP08 to align with the BSC requirement</p> <p><b>Number of calendar days comment:</b> Subsequent changes to MRA Products will need to be raised and approved by MDB</p> <ul style="list-style-type: none"> <li>• From point CP is submitted to MDB decision – approximately 1 month</li> <li>• From MDB approval to implementation – standard implementation timescale for any changes would be implemented in line with the MRA release strategy (there are three releases a year, in February, June and November).</li> <li>• (If it is a system change then from the date of approval, industry would need 6 months to update their systems accordingly. A procedural change would take approximately 3 months).</li> </ul> <p><b>Adverse Impact:</b> No</p>	Yes
<b>SAIC</b>	No	<p><b>Comment:</b> ScottishPower cannot support this change. BSCP504 is only there to detail the NHHDC process for missing or disputed reads. It should not be used to change the supplier process. MAP08 clearly states that suppliers can enter a bi-lateral agreement if the disputed read is older than 12 months and that the reading should</p>	Yes/No

Organisation	Agreement Yes/No	Comments	Impact Yes/No
		<p>not be passed to the NHHDC. As a supplier we would not be prepared to relinquish this functionality.</p> <p><b>Capacity in which Organisation is impacted:</b> Supplier, NHHDC</p> <p><b>Impact on Organisation:</b> Systems &amp; Process</p> <p><b>Number of calendar days comment:</b> Require a minimum of 6 months due to the impact on customer facing processes as well as systems.</p> <p><b>Adverse Impact:</b> Yes, if this change is approved in Jan this would not provide 6 Months lead in to implementation.</p> <p><b>Any other comments:</b> If an NHHDC receives confirmation of an agreed read which was initiated more than 12 months after the SSD they should not use the reading, but keep it for information as it could help reading validation going forward.</p>	
<b>SSE</b>	Yes	<b>No further comments.</b>	No
<b>British Energy</b>	No	<p><b>Comments:</b> We agree with the principle of this CP, however, we are of the opinion that a footnote is not a sufficient method to encourage Suppliers to work within the timeframe. For greater clarity, the information should form part of the main body of BSCP504 rather than a footnote.</p> <p>Because erroneous large EAC/AA value in Settlement is one of the most significant issues in the NHH market, we recommend that Replacement of erroneous Change of Supplier Readings that this CP seeks to clarify should become a focus in the upcoming BSC Audit.</p>	No
<b>British Gas</b>	Yes	None - clarification of existing rules	No
<b>Npower</b>	Yes	<p><b>Comments:</b> We agree with this Change Proposal but would want this process as a bi-lateral agreement between suppliers and managed outside the D300 Process. This would avoid system changes/charges.</p> <p><b>Impact on Organisation's Systems and/or Processes?</b> Yes</p> <p><b>Capacity in which Organisation is impacted?</b> Supplier</p> <p><b>Impact on Organisation:</b> Process Impacts and Systems Impacts unless the Change Proposal is amended as stated above.</p>	Yes