

## CPC00625 – Impact Assessment Responses for DCP0025, DCP0026, CP1225, CP1226, CP1227, CP1228, CP1229 and CP1230

DCP0025 - Transfer of the Non Half Hourly Data Aggregator functional requirements from PSL140 to BSCP505 following the creation of PSL100 'Generic Non Functional Requirements For Licensed Distribution System Operators And Party Agents'

### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
E.ON UK Energy Services Limited	NHHDC, <b>NHHDA</b> HHDC, HHDA, MOA	✓
Siemens Energy Services	Party Agent, <b>NHHDA</b> , NHHDC, NHHMO, HHDC, HHDA, HHMO	✓
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	✓
RWE Npower	Supplier, Supplier Agent	✓
E.ON	Supplier	✓
IMServ Europe	HHDC, HHDA, NHHDC, <b>NHHDA</b> and MOP	✓
TMA	HHDC, HHDA, NHHDA	✓
United Utilities Networks Ltd	NHHMO & HHMO	-
CE Electric UK NEDL – YEDL	<b>LDSO</b> & UMSO	-
MRASCo Ltd	MRA Services Company	-

### Detailed Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
British Energy Power & Energy Trading Ltd	✓	-	X	0
Scottish and Southern Energy	✓	-	X	0

E.ON UK Energy Services Limited	✓	<b>Agree:</b> This complies with previously agreed objectives. <b>Impact:</b> Mapping Matrices require updating.	✓	-
Siemens Energy Services	✓	<b>Impact:</b> Process change only	✓	30
AccuRead Ltd	✓	<b>Agree:</b> The Changes are acceptable	X	0
RWE Npower	✓	<b>Agree:</b> We have no immediate concerns or comments for this change	X	-
E.ON	✓	-	X	-
IMServ Europe	✓	-	X	-
TMA	✓	-	X	-
United Utilities Networks Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
MRASCo Ltd	-	<b>Impact:</b> All changes to MRA Product Set will be implemented when the PSLs are withdrawn.	X	-

DCP0026 - Movement of the functional requirements within PSL 110 'SVA Meter Operation' to BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' and BSCP550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy', following the creation of a generic non functional PSL (PSL100) via CP1182.

#### Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
United Utilities Networks Ltd	<b>NHHMO &amp; HHMO</b>	✓
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
E.ON UK Energy Services Limited	NHHDC, NHHDA, HHDC, HHDA, <b>MOA</b>	✓
RWE Npower	Supplier, Supplier Agent	✓
E.ON	Supplier	✓
IMServ Europe	HHDC, HHDA, NHHDC, <b>NHHDA</b> and MOP	✓
TMA	HHDC, HHDA, NHHDA	✓
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	X
CE Electric UK NEDL – YEDL	<b>LDSO</b> & UMSO	-
Siemens Energy Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO	-
MRASCo Ltd	MRA Services Company	-

#### Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities Networks Ltd	✓	<b>Impact:</b> Process changes and staff training	✓	180
ScottishPower	✓	<b>Implementation:</b> Manual Changes Only	X	0
British Energy Power & Energy Trading Ltd	✓	-	X	0

Scottish and Southern Energy	✓	-	X	0
E.ON UK Energy Services Limited	✓	<b>Agree:</b> This complies with previously agreed objectives <b>Impact:</b> Mapping Matrices require updating	✓	-
RWE Npower	✓	<b>Agree:</b> We have no immediate concerns or comments for this change	X	-
E.ON	✓	-	X	-
IMServ Europe	✓	<b>Agree:</b> It would appear that the change overall is neutral and as all details are incorporated in the same document it should be of benefit overall.	X	-
TMA	✓	-	X	-
AccuRead Ltd	X	<b>Disagree:</b> We can approve the principle, but there are a number of errors in the BSCP514 document which require attention before agreement can be given. <b>Other Comments:</b> I have included the comments below regarding the redline text. Just to clarify, the first couple of comments are regarding the changes to this document but I've included a number of other comments which we believe represent inconsistencies & contradictions in the documentation but these are not as result of the changes in this document & whilst I realise this was not the purpose of reviewing these documents I thought these points would be worth raising nevertheless at this time.	X	-

CE Electric UK NEDL – YEDL	-	-	X	-
Siemens Energy Services	-	-	✓	-
MRASCo Ltd	-	<b>Impact:</b> All changes to MRA Product Set will be implemented when the PSLs are withdrawn.	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	AccuRead Ltd	DCP0026 – Attachment B – BSCP550  Page 5 Table of Contents	No heading text for Sections 4.1 and 4.2.
2	AccuRead Ltd	DCP0026 – Attachment B – BSCP550 Page 47	No text for Sections 4.1 and 4.2.
			<b><u>Additional Comments which may be worth considering but not as a result of these latest changes:</u></b>
3	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 13 sect 2.2.1.2	In CoA situations (without CoS) the old MO is requested to send MTDs to new MO by the Supplier – not by the new MO as asserted in these paragraphs. See refs 5.2.1.7 and 6.2.1.7 on pages 24 and 64 respectively.

		& Page 14 sect 2.2.2.2	
4	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 16 sect 2.4.1.5	The PSL does contain the concept of Old DC readings being passed to MO en route to New DC (for cases where history has already been passed), but this is believed to be an error.  Note that the DTC contains no ability for DCs to send D0010 to a MO.
5	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 16 sect 2.4.1.6	This section tells the MO to send reading data via the Supplier to the Half Hourly DC – it should be the NHH or HH DC as appropriate to the metering point.  In addition, the MO should send the D0010 direct to the DC.
6	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 22 ref 5.1.1.6	This entry does not actually say very much – at least the ‘appropriateness of MDD items in the consideration of the Panel’ needs to be defined.  See 5.1.1.9 below.
7	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 22 ref 5.1.1.8	The prescription of ‘double entry keying’ is inappropriately specific – there may be automated solutions that bypass manual data entry.
8	AccuRead Ltd	DCP0026 – Attachment A – BSCP514	The Panel should be able to specify which items of MDD are relevant to the accuracy of Settlement – it should not be a matter that could cause dispute.  Several columns are unpopulated.

		Page 22 ref 5.1.1.9	
9	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 63 ref 6.1.1.6	This entry does not actually say very much – at least the ‘appropriateness of MDD items in the consideration of the Panel’ needs to be defined.  See 6.1.1.9 below.
10	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 63 ref 6.1.1.8	The prescription of ‘double entry keying’ is inappropriately specific – there may be automated solutions that bypass manual data entry.
11	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 63 ref 6.1.1.9	The Panel should be able to specify which items of MDD are relevant to the accuracy of Settlement – it should not be a matter that could cause dispute.  Several columns are unpopulated.
12	AccuRead Ltd	DCP0026 – Attachment A – BSCP514  Page 88 ref 7.1.17	Make clear that the midnight is ‘start of day’.
13	AccuRead Ltd	DCP0026 – Attachment A – BSCP514	Make clear that the midnight is ‘start of day’.

		Page 93 ref 7.2.17	
14	AccuRead Ltd	DCP0026 – Attachment B – BSCP550  Page 10 sect 1.2 penultimate paragraph	Meter <u>Register</u> Multiplier – not Meter Multiplier
15	AccuRead Ltd	DCP0026 – Attachment B – BSCP550  Page 11 sect 1.3 top of page	Meter <u>Register</u> Multiplier – not Meter Multiplier



CP1225 - Review of D0215 'Provision of Site Technical Details' and surrounding processes

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Association of Meter Operators	N/A	✓
United Utilities Networks Ltd	<b>NHHMO &amp; HHMO</b>	✓
Western Power Distribution	<b>Distribution Business</b>	✓
Central Networks	DC, DA	✓
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	<b>Supplier</b> , Trader and Party Agent	✓
E.ON UK Energy Services Limited	NHHDC, NHHDA HHDC, HHDA, MOA	✓
Siemens Energy Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, <b>HHMO</b>	✓
RWE Npower	Supplier, <b>Supplier Agent</b>	✓
E.ON	Supplier	✓
Electricity North West Ltd	<b>LDSO</b>	✓
TMA	HHDC, HHDA, NHHDA	✓
CE Electric UK NEDL – YEDL	<b>LDSO &amp; UMSO</b>	X
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	X
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	X
IMServ Europe	HHDC, HHDA, NHHDC, NHHDA and <b>MOA</b>	X
MRASCo Ltd	MRA Services Company	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Association of Meter Operators	✓	<b>Agree:</b> Subject to redline comment below.	-	-
United Utilities Networks Ltd	✓	<b>Impact:</b> Process changes and staff training <b>Would implementation in the proposed Release have an adverse impact? No</b>	✓	180

Western Power Distribution	✓	<p><b>Impact:</b> We will need to make system changes to send D0170s following a change to site technical details.</p> <p><b>Implementation:</b> 6 months notice needed following approval of change to schedule and undertake I.T work.</p> <p><b>Would implementation in the proposed Release have an adverse impact? No</b></p>	✓	180
Central Networks	✓	<p><b>Agree:</b> Central Networks are supportive of this change proposal and the proposed implementation of November 2008. The change has minimal impact on our business and IS processes.</p>	-	-
ScottishPower	✓	<p><b>Implementation:</b> To allow for updates to internal process and documentation.</p> <p><b>Would implementation in the proposed Release have an adverse impact? No</b></p>	X	90
British Energy Power & Energy Trading Ltd	✓	<p><b>Agree:</b> We are in support of this proposal. We would particularly support the second initiative for the LDSOs to update the MOA of changes to site technical details. We are conscious that the D0215 flow does not currently give the detail required to update the MOA of changes, either at their request or as an unsolicited flow. For example the current D0215 does not contain confirmation of what has changed and when the change occurred. We also consider that fields within the flow should become mandatory.</p> <p><b>Impact:</b> Systems and processes changes.</p>	✓	90
E.ON UK Energy Services Limited	✓	<p><b>Agree:</b> This will provide clarity following network changes</p>	X	-
Siemens Energy Services	✓	<p><b>Impact:</b> Minimal process changes</p> <p><b>Would implementation in the proposed Release have an adverse impact? No adverse impact.</b></p>	✓	60
RWE Npower	✓	<p><b>Agree:</b> We are supportive of the principle of this change, and are</p>	✓	-

		<p>keen to see it implemented, however we do have a query regarding the D0215 being sent to the Supplier in the red line documentation.</p> <p><b>Impact:</b> Supplier Agent, and depending on outcome of issue regarding D0215 being sent to Supplier, potentially Supplier too.</p> <p>System/Process</p> <p><b>Implementation:</b> November 2008 is sufficient time to implement this change</p> <p><b>Other Comments:</b> The red lined BSCP does not include reference that the D0215 be sent to Supplier for unsolicited changes to metering systems, but the requirement of this CP are that he LDSO will send both the MOA and Supplier the D0215. We would prefer that we had visibility of this.</p> <p>Depending on the outcome of this issue, there could be a greater impact to Supplier systems and processes than stated in the red lined text currently released.</p> <p><b>Would implementation in the proposed Release have an adverse impact? No</b></p>		
E.ON	✓	-	X	-
Electricity North West Ltd	✓	<p><b>Impact:</b> Both system and business process changes will be required</p> <p><b>Would implementation in the proposed Release have an adverse impact? Yes</b> as we probably will not have six months to implement change – from the time of approval of this CP</p>	✓	180
TMA	✓	-	X	-
CE Electric UK NEDL – YEDL	X	<p><b>Disagree:</b> The Distributor sends an initial D0215 on creation of the MPAN and a D0215 is sent on receipt of a D0170. It's the customer's responsibility to communicate any changes that are being made to their electricity supply to their electricity supplier. We feel that upon receipt of this information the obligation should lie with the supplier to communicate to the MOA and on that basis we reject the proposal. In addition we feel that the timescale of</p>	✓	-

		providing the D0215 within 1 working day of the LDSO updating their system is unrealistic and will be failed to be met. We are however neutral on the 1 <sup>st</sup> solution of the MOA sending D0170 request for meter technical details.		
Scottish and Southern Energy	X	<p>Although we support the principle of allowing greater communication between agents, our comments (as below) to the DCP14 still apply agents.</p> <p>'We recognise that D0215 has data items that are not included in the D0268 that the MOP would send to the supplier on receipt of the D0215. However, are these data items critical to the supplier or would the D0268 be sufficient as this would avoid LDSO sending a duplicate flow to Supplier as well? If this comments are accepted then we would accept this proposal.'</p>	✓	270
AccuRead Ltd	X	<p><b>Agree:</b> We agree with solutions 1-3, but we feel solution 4 is insufficient because it only applies to MSIDs first registered after the CP Implementation date- as MO we would always have to send a D0170 to the LDSO as we wouldn't be aware of whether the meter was registered after the implementation date &amp; therefore wouldn't know for which sites we were likely to get a response for.</p> <p>Therefore from an MO point of view it would be very useful to have an acknowledgement from the LDSO as to whether the D0170 has been received &amp; whether the information is available to output a D0215 or not.</p> <p>We also feel that it should be an obligation of the LDSO to always store the information after the implementation date so that MOs always get a D0215 following a D0170 being sent.</p> <p><b>Impact:</b> We would have to amend our processes in order to deal with receiving unsolicited D0215's.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No (if points above are considered)</p>	✓	90

IMServ Europe	X	<p><b>Disagree:</b> It was previously stated that : “Where a D0215 sent by the LDSO is received as an unsolicited flow by the MOA, then it is necessary for the MOA to discern when the change was made in relation to latest MTD held by the MOA – This is not possible as the D0215 does not hold an MSMTD”.</p> <p>This current change that suggests the LDSO is to send a D0215 to the MOA within 1WD of updating their systems is deemed beneficial but still does not fully address the previously raised concern.</p> <p><b>Impact:</b> On Receipt of an unsolicited D0215 from an LDSO it is necessary for the MOA to discern when the configuration change was made by the LDSO in relation to changes that may have been made by the MOA.</p> <p><b>Implementation:</b> No system changes are expected as the Wheatley MOP application will receive an unsolicited D0215</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Increased manual activity is expected in identifying the sequence in which configuration changes have been made to the site</p> <p><b>Other Comments:</b> While the change as suggested has some merit, it does not fully address the timing issue of the change in relation to latest MTD held by the MOA.</p>	X	
MRASCo Ltd	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	Association of Meter Operators	BSCP515 3.3 footnote 4	Current draft says: “4 At any time after a new connection (and only for MSIDs first registered after [CP implementation date]), the MOA may make further requests for Site Technical Details from the LDSO, in which case the LDSO shall respond by sending a D0215 within 5WD.” I don't understand quite how or why the restriction of 'only for MSIDs first registered after the CP implementation date' is anticipated to be managed or relevant. These

			changes/requests will occur for all metering systems irrespective of when they are first registered in settlement.
2	Western Power Distribution	BSCP515 3.3 Footnote 4	Please add "if required and" to the front of the footnote to align it with the footnote being added to BSCP514.
3	AccuRead Ltd	Attachment B v2.0 CP1225 redlined text  3.3.2 (footnote 4)	<p>We agree with solutions 1-3, but we feel solution 4 is insufficient because it only applies to MSIDs first registered after the CP Implementation date- as MO we would always have to send a D0170 to the LDSO as we wouldn't be aware of whether the meter was registered after the implementation date &amp; therefore wouldn't know for which sites we were likely to get a response for.</p> <p>Therefore from an MO point of view it would be very useful to have an acknowledgement from the LDSO as to whether the D0170 has been received &amp; whether the information is available to output a D0215 or not.</p> <p>We also feel that it should be an obligation of the LDSO to always store the information after the implementation date so that MOs always get a D0215 following a D0170 being sent.</p>

CP1226 - Amendment to the 'Investigate inconsistencies' section of BSCP504 to comply with DTC configuration

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
E.ON UK Energy Services Limited	NHHDC, NHHDA, HHDC, HHDA, MOA	✓
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	✓
RWE Npower	Supplier, Supplier Agent	✓
MRASCo Ltd	MRA Services Company	✓
E.ON	Supplier	✓
TMA	HHDC, HHDA, NHHDA	✓
United Utilities Networks Ltd	NHHMO & HHMO	-
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
Siemens Energy Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
British Energy Power & Energy Trading Ltd	✓	-	X	0
Scottish and Southern Energy	✓	-	X	0
E.ON UK Energy Services	✓	<b>Agree:</b> This will align the BSCP with current industry practice	X	-

Limited				
AccuRead Ltd	✓	<b>Impact:</b> None, as highlighted in the CP the processes associated with the CP cannot be implemented in the way the BSCP currently states. <b>Would implementation in the proposed Release have an adverse impact?</b> No	X	0
RWE Npower	✓	<b>Agree:</b> We have no immediate concerns or comments for this change	X	-
MRASCo Ltd	✓	<b>Agree:</b> Alignment of the BSCP and the DTC is beneficial	X	-
E.ON	✓	-	X	-
TMA	✓	-	X	-
United Utilities Networks Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Siemens Energy Services	-	-	X	-



CP1227 - AFYC Recalculation

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
RWE Npower	Supplier, Supplier Agent	✓
E.ON	Supplier	✓
TMA	HHDC, HHDA, NHHDA	✓
United Utilities Networks Ltd	NHHMO & HHMO	-
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
E.ON UK Energy Services Limited	NHHDC, NHHDA HHDC, HHDA, MOA	-
Siemens Energy Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO	-
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	-
MRASCo Ltd	MRA Services Company	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	<b>Implementation:</b> Manual Changes Only	X	0
British Energy Power & Energy Trading Ltd	✓	-	X	0
Scottish and Southern Energy	✓	-	X	0
RWE Npower	✓	<b>Agree:</b> We have no immediate concerns or comments for this change	-	-

E.ON	✓	-	X	-
TMA	✓	-	X	-
United Utilities Networks Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
E.ON UK Energy Services Limited	-	-	-	-
Siemens Energy Services	-	-	X	-
AccuRead Ltd	-	-	X	-
MRASCo Ltd	-	-	X	-

CP1228 - CRA Service Description Re-write

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
RWE Npower	Supplier, Supplier Agent	✓
United Utilities Networks Ltd	NHHMO & HHMO	-
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	-
E.ON UK Energy Services Limited	NHHDC, NHHDA HHDC, HHDA, MOA	-
Siemens Energy Services	Party Agent, NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO	-
AccuRead Ltd	NHHDC, NHHDA and NHHMOP	-
MRASCo Ltd	MRA Services Company	-
E.ON	Supplier	-
TMA	HHDC, HHDA, NHHDA	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
Scottish and Southern Energy	✓	-	X	0
RWE Npower	✓	<b>Agree:</b> We have no immediate concerns or comments for this change	-	-
United Utilities Networks Ltd	-	-	X	-

CE Electric UK NEDL – YEDL	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	0
E.ON UK Energy Services Limited	-	-	-	-
Siemens Energy Services	-	-	X	-
AccuRead Ltd	-	-	X	-
MRASCo Ltd	-	-	X	-
E.ON	-	-	-	-
TMA	-	-	X	-

CP1229 - Effective Date Validation in the D0052

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
Central Networks	<b>Unmetered Supplies Operator</b>	✓
CE Electric UK NEDL – YEDL	LDSO & UMSO	✓
ScottishPower	MOA, Distributor, UMSO, Supplier and <b>NHHDC</b>	✓
British Energy Power & Energy Trading Ltd	<b>Supplier</b> , Trader and Party Agent	✓
E.ON UK Energy Services Limited	<b>NHHDC</b> , NHHDA, HHDC, HHDA, MOA	✓
AccuRead Ltd	<b>NHHDC</b> , NHHDA and NHHMOP	✓
RWE Npower	Supplier, <b>Supplier Agent</b>	✓
E.ON	Supplier	✓
TMA	HHDC, HHDA, NHHDA	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	X
Siemens Energy Services	Party Agent, <b>NHHDA</b> , <b>NHHDC</b> , NHHMO, HHDC, HHDA, HHMO	X
United Utilities Networks Ltd	NHHMO & HHMO	-
MRASCo Ltd	MRA Services Company	-
IMServ Europe	HHDC, HHDA, <b>NHHDC</b> , NHHDA and MOP	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Central Networks	✓	<p><b>Agree:</b> Central Networks supports this CP as it believes that it will reduce the error in settlements resulting from failure to process D0052 flows for Unmetered Supplies.</p> <p><b>Impact:</b> There will be no impact on our UMSO systems.</p> <p><b>Implementation:</b> No Change</p> <p><b>Would implementation in the proposed Release have an adverse</b></p>	X	0

		<p><b>impact?</b> No</p> <p><b>Other Comments:</b> Central Networks supports this CP as it believes that it will contribute to a reduction in the error in settlements that has resulted from failures to process D0052 flows for Unmetered Supplies.</p>		
CE Electric UK NEDL – YEDL	✓	<p><b>Agree:</b> This change would resolve the current issue of receiving D0310s for valid D0052s due to inconsistent dates which in turn will reduce the error in settlement currently experienced by CE electric UK and the market as a whole therefore we are in favour of the proposal.</p>	X	-
ScottishPower	✓	<p><b>Impact:</b> Any change to the validation rules to a NHHDC system will have a high associated risk and will require appropriate testing. Therefore it has a medium impact on our organisation.</p> <p><b>Implementation:</b> To assess impact on systems and for changes to internal processes.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> No</p> <p><b>Other Comments:</b> The solution proposed in the CP will resolve the issue and minimise the impact to the industry.</p>	✓	180
British Energy Power & Energy Trading Ltd	✓	<p><b>Agree:</b> We support this proposal on the basis that greater clarity of the validation arrangements for D0052 dataflows will benefit the market and improve settlement accuracy. However, at the Draft CP stage we advised that Option 2 presented at that time was the more robust solution and we are disappointed that it has not been progressed.</p> <p><b>Impact:</b> Systems and processes changes.</p>	✓	90
E.ON UK Energy Services Limited	✓	<p><b>Agree:</b> This change should reduce the number of rejected D052s and the associated D0310s</p> <p><b>Impact:</b> Training materials will need to be updated.</p>	✓	-
AccuRead Ltd	✓	<p><b>Agree:</b> While the proposed changes will resolve some issues regarding D0052 validation and the subsequent issues around them (D0095s, UMSO</p>	✓	180

		<p>EAC Values etc) this will still not address as many issues that could be resolved if a clear decision had been made that chose between the date conventions. Also, this change does seem like it slightly undermines some of the concepts of D0052 validation and purpose of the D0310 reporting, but in general we agree that the proposed solution will assist the use of the D0052 flow.</p> <p><b>Impact:</b> The impact of this DCP would be mainly positive as we would have less D0052 failures and hopefully as a result, be able to respond to the required changes that can result from a D0052.</p> <p><b>Implementation:</b> There will have to be analysis, development and testing done to ensure the change was implemented correctly and that positive effect of the CP was maximised.</p>		
RWE Npower	✓	<p><b>Agree:</b> We support this change, and prefer the flexible date option.</p> <p><b>Impact:</b> Systems and Process</p> <p><b>Implementation:</b> We would look to see this change released in the November 2008 change pack</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> This change has a significant impact to our systems</p> <p><b>Other Comments:</b> Due to the size of the system impacts, the proposed implementation date of June 2008 will not give sufficient time for the required development of changes, and the subsequent testing required. Therefore we would not want to have an implementation date prior to November 2008.</p>	✓	~300
E.ON	✓	-	X	-
TMA	✓	-	X	-
Scottish and Southern Energy	X	<p><b>Impact:</b> Changes to our systems.</p> <p><b>Implementation:</b> To allow for our IT change schedule</p> <p><b>Other Comments:</b> Our comments on the DCP0016 still apply, pasted</p>	✓	270

		<p>below.</p> <p><i>' Whilst we fully support the ultimate objective of this DCP, we question the justification in terms of cost and effort when compared to the level of improvement achievable. We believe that the materiality needs further analysis.</i></p> <p><i>The sample used for analysis (pg 5, SVG76/08 paper) would suggest a duplication in volumes and timing issues. On page 6, the rejection reasons would suggest that there is a need for guidance/ understanding of the reason codes on the D0310. There also appears to be issues between certain parties only.</i></p> <p><i>The last paragraph of the Preferred solution in this DCP suggests that the inconsistency in the EFSDs is irrelevant provided the DC removes that validation rule. The validation rule needs to be clarified as we believe that the problem will still exist if there are different permutations of those rules.</i></p> <p>The largest material error in settlement is the Unmetered supplies. The 2007 Auditor's report for the Unmetered supplies implies that the issue of that of EAC mismatch as opposed to EFSDs. Therefore, implementing this change will not necessarily reduce the settlement error in the Unmetered market. We believe that this draft proposal as is, is not fit for purpose and as such should not be progressed to CP.'</p>		
Siemens Energy Services	X	<p><b>Disagree:</b> While we support efforts to reduce the numbers of D0052 failures, this CP places all responsibility on NHHDCs to validate ambiguous data (from other parties). It may be more appropriate to address the industry as a whole, to make more effort in aligning data on D0150s and D0052s.</p> <p><b>Impact:</b> This would require system and process changes.</p> <p><b>Implementation:</b> This time is to allow for the required system change development, testing and implementation</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> Depending on when this is approved, the June Release may not allow enough time for SES to implement this change.</p> <p><b>Other Comments:</b> By omitting EFSDs from validation, it leaves NHHDCs at the mercy of Suppliers' application of EFSDs, with possible detrimental</p>	✓	120



		effects on data quality. This could lead to further issues such as increased numbers of D0095 exceptions.		
United Utilities Networks Ltd	-	-	X	-
MRASCo Ltd	-	-	X	-
IMServ Europe	-	<p><b>Neutral:</b> We can see benefits from reducing the validation checks to ensure less failures but at the same time changing systems to deal with this is expensive and time consuming.</p> <p>There is a danger that by effectively making the EFDs optional and non validated field s that data quality reduces over time. It also means that there is no incentive for suppliers to maintain this data item and ensure consistency over time. The quality of this data item would in our opinion reduce over time.</p> <p><b>Impact:</b> This has a direct impact on how IMServ's NHHDC system validated and processes D0052 data flows.</p> <p>Currently the IMServ NHHDC system validated the effective from dates on D0052 data flows to ensure consistency. It does not allow for later effective dates but with the same data item value, as this is inconsistent data.</p> <p>In order to automatically process flows of this type changes will be required to the systems.</p> <p><b>Implementation:</b> Due to system changes, code will nee to be changed which is greater than the 3 month lead time proposed.</p> <p><b>Would implementation in the proposed Release have an adverse impact?</b> We would not be able to change the NHHDC code by the June release and have it tested and released to live. Therefore, we would still fail each of these flows which were inconsistent; users would manually have to process these flows on to the portfolio by changing the EFDs to match the portfolio dates.</p> <p>This would incur extra time and cost.</p>	✓	180

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower	BSCP504 v18 redlined  Line 7 page 3 of CP1225 attachment A	Missing comma after the first instance of NHHDC
2	ScottishPower	BSCP504 v18 redlined  Line 7 page 2 of CP1225 attachment A	Missing comma after the first instance of NHHDC
3	Siemens Energy Services	BSC Procedure BSCP504  4.12, bullet point 8	"Note That: • Where the NHHDC already holds a calculated EAC (i.e. associated with an AA) this should be used in preference to any EAC provided on the D0052, except where there has been a change of Profile ClassPC and/or SSC concurrent with the CoS/CoNHHDC."  This appears to contradict the rules associated with the changes introduced with Modification Proposal P196 (setting EAC to zero on vacant sites) where the Data Collector is meant to: deem on read on the Effective From date of the zero EAC it has received in a D0052 from the Supplier, and then replace the calculated EAC deriving from the deemed read with the one provided on the D0052. If this CP is approved then these rules need to be clarified.
4	RWE Npower	CP1229 Attachment A BSCP504 v18.0 Redlined P1, 4.12	A D0150 is not always required for a D0052, as suppliers may have just a PC change to notify

CP1230 - Movement of the functional requirements within PSL120 'Non Half Hourly Data Collection' to BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems registered in the SMRS', following the creation of a generic non functional PSL (PSL100) via CP1182.

Summary of Responses

Organisation	Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate)	Agreement (✓/X)
ScottishPower	MOA, Distributor, UMSO, Supplier and NHHDC	✓
British Energy Power & Energy Trading Ltd	Supplier, Trader and Party Agent	✓
Scottish and Southern Energy	Supplier, Generator, Trader, Party Agent, Distributor	✓
E.ON UK Energy Services Limited	NHHDC, NHHDA HHDC, HHDA, <b>MOA</b>	✓
RWE Npower	Supplier, <b>Supplier Agent</b>	✓
E.ON	Supplier	✓
IMServ Europe	HHDC, HHDA, NHHDC, NHHDA and MOP	✓
TMA	HHDC, HHDA, NHHDA	✓
United Utilities Networks Ltd	NHHMO & HHMO	-
CE Electric UK NEDL – YEDL	LDSO & UMSO	-
Siemens Energy Services	Party Agent, NHHDA, <b>NHHDC</b> , NHHMO, HHDC, HHDA, HHMO	-
MRASCo Ltd	MRA Services Company	-

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
ScottishPower	✓	-	X	0
British Energy Power & Energy Trading Ltd	✓	-	X	0
Scottish and Southern Energy	✓	Paragraphs 3.4.1.9 & 3.5.5 missing?	X	0

E.ON UK Energy Services Limited	✓	<b>Agree:</b> These changes are in line with previously agreed objectives <b>Impact:</b> Mapping Matrices will require updating	✓	-
RWE Npower	✓	We have no immediate concerns or comments for this change	-	-
E.ON	✓	-	X	-
IMServ Europe	✓	-	X	-
TMA	✓	-	X	-
United Utilities Networks Ltd	-	-	X	-
CE Electric UK NEDL – YEDL	-	-	X	-
Siemens Energy Services	-	<b>Impact:</b> Minimal process change	✓	30
MRASCo Ltd	-	<b>Impact:</b> All changes to MRA Product Set will be implemented when the PSLs are withdrawn.	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower	BSCP504 1.1 para 1	Unnecessary full stop after redlined 'Systems'.
2	ScottishPower	BSCP504 3.2.1.5	Matrix should map from 3.2.1.5 to PSL120 1.4.1.3.
3	ScottishPower	BSCP504 3.4.1.7	Missing from matrix - should map from 3.4.1.7 to PSL120 1.5.6.6 for valid data report footnote 48.
4	ScottishPower	BSCP504 3.5.5	3.5.5 is missing, knocking mapping of remainder of 3.5 out of alignment.