

CPC00610 – Impact Assessment Responses for CP1201, CP1205, CP1206 and CP1207

CP1201

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
United Utilities	✓	<p>Impact Comment: Internal processes and procedures will need to be updated</p> <p>Other Comments: Our only concern is that by allowing the Registrant, as well as the MOA, to submit Meter Technical Details, there may be some uncertainty between the MOA and Registrant as to who is actually submitting the MTDs. Would this create a problem if both MOA and Registrant submitted the MTDs?</p>	✓	90
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0

EDF Energy, Supply	✓	Impact Comment: Although this impacts on processes details within BSCPs are used to run these processes. As such changes can be taken on board as soon as new BSCPs are released.	✓	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	60
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	✓	Impact Comment: Changes to internal documentation	✓	20
E.ON UK Energy Services Metering	✓	Agree Change Comment: This change will reduce the potential for error. Impact Comment: Minor changes will be required to procedures	✓	-
British Energy	✓	Agree Change Comment: See comments against each document. Impact Comment: Manual processes only affected by this change	✓	-

Comments on redline text

No.	Organisation	Section	Comment
1	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	BSCP20 p.8 ref 3.1.9	'To' column should also contain MOA or Registrant
2	Npower Limited, Npower Northern	BSCP20	Action column should say The existing Registrant returns form BSCP20/4.6 if they have any objections (unless BSCP20/4.6 is to be updated so that the existing

	Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Ref 3.3.3 p.15	Registrant may accept or object the change). The input information required column should reference form BSCP20/4.6 not BSCP02/4.6 (which doesn't exist).
3	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	BSCP20 p.16 ref 3.4	The changes mean that there is no reference made to the transfer of records from the old MOA to the new MOA. Examples of records held by an MOA include commissioning data, mapping data and certification and/or calibration details as well as meter technical details.
4	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	BSCP20 p.18 ref 3.5.1	'To' column should also contain MOA or Registrant
5	British Energy	BSCP 15 Paragraphs 1.1 (twice), throughout Interface Tables 3.7 and 3.8, forms 4.3 and 4.4	The description 'Maximum Positive and Maximum Negative BM Unit Metered Volume' is incorrect technically as the latter term equates mathematically to the Minimum Import or Demand whereas what is required is the Maximum Import or Demand. The original wording is correct but might be made clearer as follows: 'Maximum Positive (Export) and Minimum Negative (Import) BM Unit Metered Volume'
6	British Energy	BSCP15 3.1.2 and 3.1.3,3.2.2 and 3.2.3, 3.4.3 and 3.4.4, 3.5.4 and 3.5.5, 3.16.2 and 3.16.3 3.7.2, 3.8.2	CRA will Check before issuing an acknowledgement (or rejection). Hence these steps should be reversed or combined. The 'Check' stage should be added for consistency throughout the document
7	British Energy	BSCP15	Refers to invalid agent CRS, should read CRA This step is repeated in a number of different BMU registration activities (see point

		3.1.12	no.s 3 & 4 below), which should be stated in a consistent manner. The information required should be extended to include "... for authorisation to proceed with registration"
8	British Energy	BSCP15 3.2.6	This describes two opposite flows of information yet only one is shown in the From and To. Only the return is important and hence this step should mirror 3.1.12 to provide consistency throughout the document.
9	British Energy	BSCP15 3.4.8/3.5.11/3.6.4	These steps should be a mirror of 3.1.12 to ensure consistency
10	British Energy	BSCP15 3.4.9	Information required does not match recipient: Parties receive CRA-I014, BSCCo and TC both receive CRA-I020, BSC Agents (SVAA) receive CRA-I015
11	British Energy	BSCP15 3.4.10	3.1.17 (Point of no Return) was removed by Operational Review Group as BSC has no such obligation. This should be removed for consistency
12	British Energy	BSCP15 3.5.3	Operational Review Group agreed to remove reference to CRA-I005; if this flow is no longer valid, it should also be removed from 3.1.1, 3.2.1, 3.3.6, 3.4.4, and 3.7.1
13	British Energy	BSCP15 3.6	Add note that this process does not apply to a Transfer of Supplier ID. I thought this process would be part of BSCP65 not BSCP15.
14	British Energy	BSCP15 3.6.7	If this section is retained, add Party in the 'To' column
15	British Energy	BSCP15 3.7.4	BSCCo receives only CRA-I020
16	British Energy	BSCP15 3.13.3	Deregistration of Role may have to wait until after RF (or even DF) settlement runs

17	British Energy	BSCP15 3.13.6	Dates don't match but must be consecutive
18	British Energy	BSCP15 3.14.3	Transferee ... and registered role of Supplier
19	British Energy	BSCP15 3.15	Remove ';' before Lead Party
20	British Energy	BSCP15 3.16.3	Add into CRA checks that party has registered Interconnector User Role
21	British Energy	BSCP15/4.10	Declaration that BMU is not associated with TU other than as a sole TU. This is inconsistent with BSCP15/4.11 which requests TU name Incorrect reference for registration (15/4.1). Deregistration (15/4.2) should never be required, whilst registration (15/4.1) is required only if data is to be changed
22	British Energy	BSCP20 2.1/2.2	ETD has been added although I am not convinced this is required. I believe the only reference is in form BSCP20/4.7 which is incorrect (see comment below)
23	British Energy	BSCP20 3.1	Add footnote 'Not required for Change of CVA BMU Lead Party' as per form BSCP 20/4.1
24	British Energy	BSCP20 3.5.4	Prior to EFD not REFD. EFD relates to changes to MTD data, REFD to registration of MSID
25	British Energy	BSCP20 All timetables	As discussed for BSCP15, CRA or CDCA validates and acknowledges or rejects submissions. These steps are omitted from alltimetables
26	British Energy	BSCP20 All BSCP20 forms	There is an inconsistency in all forms where Party is referred to as either Party or Registrant. Party would be more consistent with BSCP38
27	British Energy	BSCP20/4.6	If MOA can object, From Details should be Participant/MOA ID

28	British Energy	BSCP20/4.7	De-registration is with effect from RETD not ETD which relates to MTD changes
29	British Energy	BSCP20/4.8	Is a change of MOA a change to MTD? If yes then form is correct, else the effective from date is an REFD
30	British Energy	BSCP02 Figure 1	The diagram is a misinterpretation of metering equipment. Registers relate to Meters not outstations. Meter should be expanded to show Registers as part of the Meter with the existing Registers replaced as Channels on the outstation.
31	British Energy	BSCP38 4 Category G	Party is used throughout this procedure; changing to Registrant is unnecessary as it introduces inconsistency.
32	British Energy	BSCP38 A Category H	Use Party not Registrant for consistency

CP1205

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p>Comments:</p> <p>Under the proposed solution would it be possible to include a diagrammatic representation of what is meant by amending the CDCD functionality such that E03 and E04 exceptions are not reported for the Settlement 1 day either side of an NHHDA appointment date? It would be useful to see the 'as is' and 'to be' processes mapped and displayed as diagrams.</p> <p>p1, 3rd scenario describing when an E03/E04 is reported. We would welcome further explanation as to what this scenario means i.e. is the scenario where a D0209 is rejected or where a D0055/D0205 is rejected?</p> <p>p2, 4th paragraph beginning "Once implemented this change will apply..." - Could Elexon please confirm that the CP will remove all historic instances of E03/E04s that meet the criteria defined in the solution, or if not expand on exactly what will be removed.</p> <p>Regarding the implementation date - we would prefer to see these 3 change proposals for the D0095 reporting to be introduced earlier than the proposed date of February 2009.</p>	-	-
British Energy Direct Ltd	✓	Impact Comment: Processes will need to reviewed and updated.	✓	30
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd;	✓	-	X	0

Medway Power Ltd;				
EDF Energy, Supply	✓	<p>Impact Comments: We understand that with changes scheduled in February 2008 to NHHDA that there is some reticence to implement other changes in 2008. However, we believe that benefit to both Suppliers and NHHDA's of this change could be significant, although see comments below, and as such we would wish for a June 2008 release to be considered for this change.</p> <p>Other Comments: At present there is no clear indication as to how many errors would be addressed by change proposed. It could be beneficial for some further analysis to be conducted by Elexon (possibly via some extracts taken from NHHDA) which would allow benefits this change to be fully quantified. If these are as expected significant then this would back our feeling that a June 2008 release for this change would be worth pursuing.</p>	✓	90
Siemens Energy Services	✓	-	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	✓	-	✓	0
E.ON UK Energy Services Metering	✓	<p>Agree Change Comment: The removal of the requirements to send D95s relating to Immaterial Superfluous Consumption will allow Participants to more readily identify significant D95s</p> <p>Impact Comment: Minor changes to procedures</p>	✓	-

<p>IMServ Europe Ltd</p>	<p>X</p>	<p>Disagree Change Comment: Whilst we fully support the ultimate objective of these three CPs we believe that they cannot be justified in terms of cost and effort when compared to the level of improvement achievable.</p> <p>We believe that all 3 of the D0095 CPs are just “touching the surface” of the D0095 issues and will not provide large benefits in the D0095 arena. The 3 CPs appear to be a “patch” job to simply reduce the number of exceptions reported rather than an attempt get to the root of why large numbers of exceptions are generated and how to correct these. It would appear that these are 3 starter CPs to be followed by others at a later date. Ultimately, this then becomes a larger cost solution as a result of a piecemeal approach.</p> <p>Impact Comment: The NHHDA system would need to be changed to include the amendments to the CDCD processing. This would mean testing and implementing a new version of NHHDA.</p> <p>Implementation Comment: Needs development of a new NHHDA release from LogicaCMG, then testing and implementation at all Party Agents.</p> <p>Other Comments: Although the suggested solution will probably reduce the number of E03 and E04 exceptions we do not feel that it does enough to actually address the root cause of the majority of these exceptions. The solution proposed in the CP will only reduce the number of E03 and E04 exceptions which are generated on CoS events concurrent with change a change of NHHDA agent. To change the functionality of the NHHDA Check Data Collector Data (CDCD) to ensure that E03 and E04 exceptions are not reported 1 day either side of the NHHDA appointment will only work if there is a reading on the NHHDA appointment date.</p> <p>In our experience, most of the E03 and E04 exceptions are actually generated when there is change of agent (CoA) activity not concurrent with CoS. In these scenarios no reading is required on the change of agent date and hence the EAC and AA “effective from and to” dates bear no relation to the NHHDA appointment date in all cases: therefore using the NHHDA “effective date - and + 1 day” will not have much effect in reducing erroneous E03 and E04 exceptions. On CoDC and CoDA events</p>	<p>✓</p>	<p>120</p>
--------------------------	----------	---	----------	------------

		<p>the last valid reading is sent to the new NHHDA to provide forward looking EACs with "Effective from" dates prior to the NHHDA appointment (thus creating E03 errors for all dates up to the NHHDA appointment date). When the new DC then obtains a reading and calculates an AA this is sent to the old and new NHHDA agents and thus spans the CoA activity. An E04 error will normally be generated for the old agent from the date of the CoA to the ETD of the AA e and one for the new agent from the EFD of the AA till the date of the CoA. Again this has nothing to do with the NHHDA appointment dates. Exception errors would reduce by implementing this change but maybe not by as many as the words in the CP may suggest.</p> <p>Presumably where the solution states "change the functionality of the NHHDA Check Data Collector Data (CDCD) to ensure that E03 and E04 exceptions are not reported 1 day either side of the NHHDA appointment" this means that if the exception generated has an EFD or an ETD of a date 1 day either side of the NHHDA appointment, then the whole exception does not get generated. The wording in the CP does not make this implicitly clear for a solution.</p> <p>We therefore do not feel that this CP goes far enough to address the root cause of the majority of the E03 and E04 errors and should be revised to include more valid scenarios.</p>		
United Utilities	-	Neutral Comment: No impact on MOA	X	-

CP1206

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Comment: Under the proposed solution would it be possible to include a diagrammatic representation of what is meant by amending the CDCD functionality such that E14 exceptions are not reported for the first EAC received from a NHHDC upon Change of Supplier? It would be useful to see the 'as is' and 'to be' processes mapped and displayed as diagrams. Under the proposed solution why are we excluding those MPANs where we have an EAC?	-	-
British Energy Direct Ltd	✓	Impact Comment: Processes will need to reviewed and updated.	✓	30
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
EDF Energy, Supply	✓	Impact Comments: We understand that with changes scheduled in February 2008 to NHHDA that there is some reticence to implement other changes in 2008. However, we believe that benefit to both Suppliers and NHHDA's of this change could be significant, although see comments below, and as such we would wish for a June 2008 release to be considered for this change. Other Comments: At present there is no clear indication as to how many errors would be addressed by change proposed. It could be beneficial for some further analysis to be conducted by Elexon (possibly via some extracts taken from NHHDA) which would allow benefits this change to be	✓	90

		fully quantified. If these are as expected significant then this would back our feeling that a June 2008 release for this change would be worth pursuing.		
Siemens Energy Services	✓	-	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	✓	-	✓	0
E.ON UK Energy Services Metering	✓	Agree Change Comment: The removal of the requirements to send D95s relating to Immaterial Superfluous Consumption will allow Participants to more readily identify significant D95s Impact Comment: Minor changes to procedures	✓	-
IMServ Europe Ltd	X	Disagree Change Comment: Whilst we fully support the ultimate objective of these three CPs we believe that they cannot be justified in terms of cost and effort when compared to the level of improvement achievable. We believe that all 3 of the D0095 CPs are just "touching the surface" of the D0095 issues and will not provide large benefits in the D0095 arena. The 3 CPs appear to be a "patch" job to simply reduce the number of exceptions reported rather than an attempt get to the root of why large numbers of exceptions are generated and how to correct these. It would appear that these are 3 starter CPs to be followed by others at a later date. Ultimately, this then becomes a larger cost solution as a result of a piecemeal approach.	✓	120

		<p>Impact Comment: The NHHDA system would need to be changed to include the amendments to the CDCD processing. This would mean testing and implementing a new version of NHHDA.</p> <p>Implementation Comments: Needs development of new NHHDA release from LogicaCMG, then testing and implementation at all party agents.</p>		
United Utilities	-	Neutral Comment: No impact on MOA	X	-

CP1207

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	<p>Comment: Under the proposed solution would it be possible to include a diagrammatic representation of what is meant by modifying the CDCD functionality such that E01, E02 and E06 exceptions are not reported to Suppliers where they relate to past appointed Data Collectors? It would be useful to see the 'as is' and 'to be' processes mapped and displayed as diagrams.</p> <p>General note - the issue highlighted in this CP doesn't appear to affect as many exceptions as the earlier 2 CPs that have been mentioned therefore is it still as feasible to implement?</p>	-	-
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	X	0
EDF Energy, Supply	✓	<p>Impact Comments: We understand that with changes scheduled in February 2008 to NHHDA that there is some reticence to implement other changes in 2008. However, we believe that benefit to both Suppliers and NHHDA's of this change could be significant, although see comments below, and as such we would wish for a June 2008 release to be considered for this change.</p> <p>Other Comments: At present there is no clear indication as to how many errors would be addressed by change proposed. It could be beneficial for some further analysis to be conducted by Elexon (possibly via some extracts taken from NHHDA) which would allow benefits this change to be</p>	✓	90

		fully quantified. If these are as expected significant then this would back our feeling that a June 2008 release for this change would be worth pursuing.		
Siemens Energy Services	✓	-	✓	90
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd.	✓	-	✓	0
E.ON UK Energy Services Metering	✓	Agree Change Comment: The removal of the requirements to send D95s relating to Immaterial Superfluous Consumption will allow Participants to more readily identify significant D95s Impact Comment: Minor changes to procedures	✓	-
IMServ Europe Ltd	X	Disagree Change Comment: Whilst we fully support the ultimate objective of these three CPs we believe that they cannot be justified in terms of cost and effort when compared to the level of improvement achievable. We believe that all 3 of the D0095 CPs are just "touching the surface" of the D0095 issues and will not provide large benefits in the D0095 arena. The 3 CPs appear to be a "patch" job to simply reduce the number of exceptions reported rather than an attempt get to the root of why large numbers of exceptions are generated and how to correct these. It would appear that these are 3 starter CPs to be followed by others at a later date. Ultimately, this then becomes a larger cost solution as a result of a piecemeal approach.	✓	120

		<p>Impact Comment: The NHHDA system would need to be changed to include the amendments to the CDCD processing. This would mean testing and implementing a new version of NHHDA.</p> <p>In light of this reporting change and dependant on the actual details of the changes made, we may need to check that the way that IMServ currently actively actions D0095 exceptions on behalf of suppliers from the NHHDA application is still possible. We need to ensure that as NHHDA agent we do not lose visibility of all exceptions that exist for a supplier for that registration period, irrespective of past NHHDC agents being involved. If this is not the case then existing NHHDC agents will not be able to proactively action suppliers D0095s without extra data requests from the suppliers.</p> <p>Implementation Comment: Needs development of new NHHDA release from LogicaCMG, then testing and implementation at all party agents.</p> <p>Other Comments: The CP quotes "At present the NHHDA software will send E01/E02/E06 exceptions to all NHHDCs that have been appointed at any time within the relevant Supplier registration", This is a little misleading as D0095s are only sent to suppliers and are never sent directly to NHHDC agents. We believe that this is attempting to say that D0095s are reported by each NHHDA agent for all NHHDCs and not just the one error reported against the most recent NHHDC agent. This has led to some confusion as some people have read this to mean that suppliers will receive less information and reduced D0095 information whereas they should receive the same information, simply less instances of that same information. We believe that the wording on this CP is not very clear and it is difficult to see exactly what the solution suggests. As long as the current DC has visibility of all of the exceptions that the supplier receives on the D0095 via the NHHDA database then all should be OK. From the wording of this CP there is not enough detail in order to fully assess this change.</p>		
British Energy Direct Ltd	X	<p>Disagree Change Comment: BEDL are concerned that if the changes proposed in this CP are implemented, then material exceptions could be missed. It is unclear whether the DA will still report on E01 and E06 exceptions for missing preceding data as this could be caused by the previous DC failing to process data and forward history. What BSC</p>	-	-

		assurance is there that the old DC will take the necessary action? We are of the opinion that this CP requires further clarification and should not be progressed in its current form.		
United Utilities	-	Neutral Comment: No impact on MOA	X	-