

CPC00609 – Impact Assessment Responses to DCP0009, DCP0010, DCP0011, DCP0012, CP1199, CP1202, CP1203 and CP1204

DCP0009

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
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
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	-	X	-

UDMS	✓	<p>Agree Change Comment: It is not entirely clear what would constitute a valid audit trail.</p> <p>Impact Comment: We will have to develop an audit trail facility</p>	✓	90
British Energy Direct Ltd	✓	<p>Impact Comment: Processes will need to be reviewed.</p>	✓	30
Western Power Distribution	✓	<p>Impact Comment: Procedure for audit tracking where late proving tests occur to be documented and implemented.</p>	✓	90
IMServ Europe Ltd	✓	<p>Agree Change Comment: We agree with all recommendations of this CP, in accordance with the rationale defined within the proposal.</p> <p>We also believe that ELEXON should investigate the justification for flagging sites with failed proving tests as estimated, as described in the proposal document.</p>	✓	30
EDF Energy	✓	<p>Implementation Comment: To ensure new audit issue is included in process and all relevant team members are aware of requirement.</p>	✓	90
E.ON UK Energy Services Limited	✓	<p>Agree Change Comment: This modification will provide additional confidence in the proving test process</p> <p>Other Comments: Some guidance should be given as to what form the audit trail should take to support consistency.</p>	-	-
Stark Software International Ltd	✓	<p>Agree Change Comment: Will provide comfort to Auditors and others for the reason for any delay.</p> <p>Impact Comment: Procedural only</p>	✓	30
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-
Isabel Scott-Skinner	-	-	X	-

DCP0010

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	<p>Agree Change Comment: Agree in principle however the following needs to be addressed to add clarity:-</p> <p>Page 16 Step 3.4.3. What data? This should be specified in 'Information Required'</p> <p>Page 29 para 4.5.1 "shall be sited by agreement with the Associated Supplier" has been omitted</p> <p>Page 28 Process 3.14 "Proving HH Unmetered SVA Metering Systems" - another step should be added - MA notifies the Supplier/LDSO that the proving test has been successfully completed</p> <p>Page 20 Step 3.7.7 - "until such time as the energisation status is set to energised by the Supplier" is superfluous and should be removed. If, at some point in the future, the Supplier decides to energise the Metering System they will just follow process 3.7</p>	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	X	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd.	✓	<p>Agree Change Comment: The change should aid clarity by giving one point of reference for MAs</p> <p>Impact Comment: There will be no impact on our systems</p> <p>Implementation Comment: To update internal documentation</p>	X	10

SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.		Other Comments: We agree the draft change but feel that the suggestions given below should be included within the actual CP when issued.		
British Energy Direct Ltd	✓	Impact Comment: Changes to systems and processes may need to be actioned pending a full operational review.	✓	90
EDF Energy	✓	-	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	60
Power Data Associates	X	Disagree Change Comment: I agree with the principle, but there are many unresolved discrepancies between PSL170 & BSCP520 and the current drafting changes some of the requirements on the agent. The scope of this change was not to change the requirements, simply to merge the documents. A revised draft needs to be created which combines the documents, a separate (possibly parallel) DCP needs to be raised which addresses the discrepancies.	✓	90
Gemserv	-	-	X	-
E.ON UK Energy Services Limited	-	Neutral Comment: We do not provide a meter administrator service	-	-

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	Attachment A Redlined BSCP520_v 11. P13	ref. 3.2.12. Should this be from the MA rather than the HHDC?

2	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	1.2.4.6 / 3.4	A reference to section 3.4 where steps are laid out would add further clarity and link section 1 to the actual processes detailed in section 3.
3	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	1.5 (6th bullet point)	Would it not be better to use the accepted naming convention HH /NHH UMS as opposed to Equivalent and Profiled UMS as is the accepted naming convention within BSCP520 at present. Deviation from this will only cause confusion. At the very least the definitions should be contained within the glossary next to NHH and HH respectively
4	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	3.1.16	This should be contained within MA roles and responsibilities (R&R) in section 1 and not a step within 3.1.
5	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	3.2.5 & 6	This is surely an obligation within the UMSO R&R in section 1. If this has been an issue identified by MAs then it could possibly be justified to be included but if not then the step is not required.
6	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	3.2.7	This would be better placed within MA R&R
7	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	3.13.1	In step 3.13.3 the UMSO is notified of the fault. Would it not be useful if the UMSO was also notified in step 3.13.1 along with the Supplier and HDDC when a fault is suspected.

8	Power Data Associates	1.2.4.1	Existing paragraph 1.1.2.1 moved to 1.2.4.4 not 1.2.4.1 as stated in tables. There are similar inconsistencies in the cross referencing
9	Power Data Associates	1.5	Introduction of a paraphrasing of the BSC is not helpful. This has the effect of taking the requirements out of context, and will lead to difficulties maintaining the BSCP and BSC in step during subsequent changes.
10	Power Data Associates	3.1.17, 18 & 19	Where items are not known it would be more appropriate for the old 1.4.1.12 & 13 to refer to section 3.10 'market domain data' to update correctly and receive from UMSO. Switch Codes & Charge Codes are now part of MDD, although the documents allow for UMSOs to provide them to MAs. An audit issue has been raised on this being done too frequently, and without reference back to ELEXON. Could also link to 3.12. Would prefer to see this reviewed/reworded
11	Power Data Associates	3.1.21	Note 3 has appeared, not identified from where - found a reference in old 1.5.1.3
12	Power Data Associates	3.2.5 & 6	Under a section entitled 'Amendment to Inventory' the concept of not receiving an inventory is contradictory.
13	Power Data Associates	3.2.8, 9, 10 & 11	See comments for 3.1.17, etc., cross refer to a revised section 3.10
14	Power Data Associates	3.2.12	The has been a new requirement to send a copy of the summary inventory to the HHDC. Can not find a source for this, or rational reason. The to/from is odd as the HHDC will not have a copy of the summary inventory
15	Power Data Associates	3.2.12	This section should simply refer to section 3.9 – Collection activities
16	Power Data Associates	3.4.4 & 5	Should simply refer to section 3.9 – collection activities
17	Power Data Associates	3.4.6	This requirement should be added into section 3.9
18	Power Data Associates	All	Any reference to kVarh should read kVARh

19	Power Data Associates	3.9.1.3	Unclear where this requirement has originated. The table quotes a irrelevant reference. The requirement to meet settlement runs is covered in the existing statements in 3.9.1.1 & 2
20	Power Data Associates	3.9.1.4	This is a new requirement, unclear where it has originated, there is no reference in the cross reference table
21	Power Data Associates	3.9.1.10	Should refer to 3.9.1.9 not 8
22	Power Data Associates	3.10.4	Curious addition as there is no mechanism or step for an MA to receive MDD from SVAA. The MA is not a role recognised in the DTC.
23	Power Data Associates	3.10.6	MDD for an MA comes also directly from ELEXON in the form of updates to the Operational information document
24	Power Data Associates	3.13.2	Last sentence, "...If possible..." is not appropriate in this section, it is covered in 3.13.3 & 14. The steps would then be sequential.
25	Power Data Associates	3.14	This is a curious addition. The steps in the original document were odd, the steps in this one are different. But neither actual define a very workable process. Reference in 3.14.2 should be to EM rather than Metering System
26	Power Data Associates	4.5.1	The wording from the original document has been amended, changing its meaning. Although the second paragraph has been copied, it does illustrate that within an inventory some items will be determined from a PECU array, others will be on a solar dial timeswitch, therefore any one inventory is not an 'all or nothing'.
27	Power Data Associates	PECU Maintenance...	Although adding the reference to UTC sounds logical, the array design means that it does not actually know the time as the recording device is a second counter – not a clock.
28	Power Data Associates	4.82 – 5	Process should really be 3.9 and PSL100 section 10.2.1
29	Power Data Associates	4.82 – 6	Process should really be with 3.9 and capture a working PECU Array. Reported by PSL100 section 10.1.2

DCP0011

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	Agree Change Comment: Agree in principle however Step 3.4.2.2, in BSCP 502, seems a bit over the top - "The HHDC shall confirm that the SVA MS Number is registered to the MOA submitting the fault report." Surely, checking the authority of the market participant is a generic requirement for all communications so why specify it here?	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	X	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Implementation Comment: 5 Days notification allows us to update internal documentation.	X	5
UDMS	✓	Impact Comment: All the requirements already exist	X	-

British Energy Direct Ltd	✓	Impact Comment: Changes to systems and processes may need to be actioned pending a full operational review.	✓	90
IMServ Europe Ltd	✓	Impact Comment: Internal Procedures	✓	30
EDF Energy	✓	-	X	0
E.ON UK Energy Services Limited	✓	Agree Change Comment: This is in line with previously agreed objectives	-	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	60
Stark Software International Ltd	✓	Agree Change Comment: But do not understand the need for repeated parallel references to "SVA MS" etc.	-	0
Gemserv	-	Impact Comment: There are two references to PSL130 in the E2Es which need to be changed for references to BSCP 502 and/or BSCP 550. Other Comments: The change process takes one month from a CP's creation through to its acceptance at MDB. The CP would then be implemented at the next scheduled product release date (the last Thursday in February and June, and the first Thursday in November).	✓	30

Comments on redline text

No.	Organisation	Section	Comment
1	UDMS	BSCP502V1 4 redline v0.3 1.4 Balancing and Settlement Code	"HHDCs are subject to the Accreditation Requirements and the Certification Requirements of Section J." Earlier in the document, it refers to the qualification process; the same thing should be done here.

		Provision	
2	IMServ Europe Ltd	3.2.1.2, 3.2.3.2, 3.2.4.2, 3.2.7.2, (and other references throughout)	It was not our understanding that there would be an attempt to insert general requirements from the PSL into the Interface and Timetable section of the BSCP. Within PSL130 these obligations are not detailed at process level therefore we expected this to have been added as a summary requirement in the Introduction, rather than reflected throughout each individual process in the revised BSCP. The insertion of such information in the Interface Section is both confusing and superfluous.

DCP0012

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
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
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-

<p>ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.</p>	<p>✓</p>	<p>Agree Change Comment: Using standardised naming conventions within BSCP27 and better reflecting actual industry practice should help to make the process more concise and robust.</p> <p>Impact Comment: There should be no impact</p> <p>Implementation Comment: To update internal documentation</p>	<p>X</p>	<p>10</p>
<p>Western Power Distribution</p>	<p>✓</p>	<p>Agree Change Comment: Agree with the intent of what is being done but would suggest the proposed new wording could be simpler. Please see below.</p> <p>Other Comments:</p> <p>1) Change the first sentence of BSCP27 section 1.11 'Re-Inspections' to:</p> <p>'Where a category 1 or 2 non-compliance (excluding category 1 or 2 non-compliances relating to CT/VT/Meter Certificates and Meter Technical Details) has been identified by the TAA and subsequently reported by the MOA, HHDC/CDCA, or Registrant as rectified, it is possible that the Metering System will be re-inspected by the TAA to confirm compliance, if it has been altered or amended in order to achieve compliance.'</p> <p>2) Bring sections 1.11 and 3.4 of BSCP27 in line with current working practice by adding the words "at the end of a quarter, the TAA selects a sample of 10% (or any other percentage as determined by the Panel) of the category 1 non-compliances that a participant has rectified during that quarter and then carries out an inspection during the following quarter of those Metering Systems that have been altered or amended in order to achieve compliance".</p>	<p>X</p>	<p>0</p>

IMServ Europe	✓	-	-	-
EDF Energy	✓	-	X	0
E.ON UK Energy Services Limited	✓	Agree Change Comment: This will remove potential confusion		-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	60
British Energy Power & Energy Trading Ltd	-	-	X	-
Gemserv	-	-	X	-

CP1199

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	Agree Change Comment: Agree in principle – just one query about Page 6 Step 3.3.1 - Method is 'BSCP 501'. Why refer the reader to BSCP 501 why not add something to the heading to refer the reader to BSCP 501 (3.10) in the same way that 'transfer of Metering System registration from CMRS to SMRS' is referred to BSCP68?	X	0
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Agree Change Comment: The changes should help clarify the process. Impact Comment: There should be no impact Implementation Comment: To update internal documentation Other Comments: It would be beneficial if there was a reference made to the guidance document within the BSCP.	X	10
Western Power Distribution	✓	Implementation Comment: Reflects current practice, no change needed	X	0
EDF Energy	✓	-	X	0
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct	X	Disagree Change Comment: Having previously rejected this as a DCP, and there being little change to alleviate our concerns with regard to the high level operational requirements of section 3.9 we feel we cannot support this CP in its current form. Subsequently our previous response still stands.	-	-

Limited				
British Energy Direct Ltd	X	Disagree Change Comment: In our response to DCP0006 we commented 'in line with market concerns about the sharing of information between Distribution, the Meter Operator and the Supplier in a timely manner, BEDL believe the absence of timescales creates ambiguity'. Having reviewed CP1199, timescales still have not been specified. Impact Comment: Systems and processes will need to be reviewed.	✓	90
Gemserv	-	-	X	-
E.ON UK Energy Services Limited	-	-	-	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	Pp19 Comment under 3.8 heading	The text refers the reader to appendix 4. I would question whether this is still relevant now that Appendix 4 has been all but removed. Please see below for the text. "Refer to Appendix 4 for further details regarding the LDSO's role in submitting CVA data into Settlement".

CP1202

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
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
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Implementation Comment: The proposed implementation date of February 2008 is acceptable.	X	-
Western Power Distribution	✓	Agree Change Comment: Subject to redline comments	X	0

EDF Energy	✓	-	X	0
UDMS	-	-	X	-
British Energy Power & Energy Trading Ltd	-	-	X	-
IMServ Europe Ltd	-	-	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-
Gemserv	-	-	X	-
E.ON UK Energy Services Limited	-	-	-	-

Comments on redline text

No.	Organisation	Section	Comment
1	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	Page 22, "Test Environment" , paragraph 1	The removal of only the word "Specification" leave the sentence unclear. Suggest that Elexon also remove the next word "for".
2	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	Whole document	There is an inconsistent format for the Footers. The position of the Elexon Copyright is sometimes above and sometimes below the page numbering.
3	British Energy Power & Energy Trading	Page 22 –	The paragraph entitled 'Test Environment' has had the word Specification struck-through.

	Ltd	Form F601/01	Without this word, the sentence is neither clear nor grammatically correct.
4	Western Power Distribution	Page 30 Appendix 3.3.3. a iii	Uses the term "Parties". As it is not defined, the BSC definition must apply. I do not believe any BSC Party will be present. There is a definition for Person, which can cover a company. I believe tests are witnessed/performed by individuals representing organisations, and both need recording.
5	Western Power Distribution	Page 33 3.3.3.4	Suggest last paragraph would be better as "Note test 8 should be repeated for all flag conditions, <u>as required by the relevant Code of Practice</u> "
6	Western Power Distribution	Page 38 3.4.5 (a)	Typo - ".. intended parts <u>s</u> earthed"
7	Western Power Distribution	Page 38 3.4.5 (g)	Reference is made to"(red phase in)" and "(red phase out)". Red should be amended to L1 to align with the harmonised colours/markings introduced from 2004.

CP1203

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
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
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	-	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Implementation Comment: The proposed implementation date of February 2008 is acceptable.	X	-
Western Power Distribution	✓	-	X	0

EDF Energy	✓	-	X	0
British Energy Power & Energy Trading Ltd	X	<p>Disagree Change Comment: See other comments</p> <p>Other Comments: It is not clear why it is considered necessary to include Active and Reactive meter accuracy tables in both 3.4.8 of BSCP601 (CP1202) and Appendix 3.9 of BSCP601 (CP1203). However assuming there is a justified reason for this, BE consider they should be consistent with one another.</p> <p>BE note the latter appears to be derived from BS EN 62053 and matches the accuracy requirements defined in Issue 5(v4.3) of CoP4 dated 23/07/07. However the origin of the former is unclear and, if left unchanged, suggests that limits for new meter Approval and Compliance would be less onerous than the limits for lifetime testing. BE believes this should not be the case.</p>	X	-
IMServ Europe Ltd	-	-	X	0
Gemserv	-	-	X	-
E.ON UK Energy Services Limited	-	-	-	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	X	-

CP1204

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement
Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; and Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;	✓	-	✓	12 months
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	Impact Comment: The implementation of the CP will require a system change to LAMP to allow for the new 13 digit charge code format. Additionally, resources will be required for UAT testing. For these reasons, we would look for the go-live date being June 2008 (rather than February), so that both LAMP programming and UAT testing could be completed adequately	-	-
ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	✓	Agree Change Comment: The change will address the issue of the shortage of codes to reflect new energy efficient apparatus which is coming on to the market. It will also allow the use of dimming technologies both in the HH and NHH UMS markets. The new code structure should also be future proof meaning the issue will not have to be revisited for the foreseeable future. It will also allow the adoption of new CMS arrangements in the HH market. Impact Comment: A change will be required to the current UMS system to allow the input of 13 digit charge codes.	✓	90
British Energy Direct Ltd	✓	-	X	-

Western Power Distribution	✓	Impact Comment: This will require system changes.	✓	90
EDF Energy	✓	-	X	0
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	✓	60
EDF Energy Networks	✓	<p>Agree Change Comment: We support the principle of this CP. Perhaps, in time, the extended Charging Code will be of greater value. However, we are also mindful of the need to support greater detail in EAC calculation which may serve to encourage energy-efficient procurement decisions by customers.</p> <p>Impact Comment: We will require system changes to deliver compliance within this area.</p> <p>Implementation Comment: Our IT provider has requested a minimum of six months notice. At this current point in time we have concerns whether the February 08 release is achievable</p> <p>Other Comments: We wish to draw Elexon's attention to the following points raised below:</p> <ol style="list-style-type: none"> 1. The percentage dimming values are of no value in respect of CMS. CMS dimming may vary from day to day and from hour to hour and that information will be contained in the Control Log provided to the MA. The inventory tendered to the UMSO will simply show all lamps at 100% regardless of true, dynamic switching patterns. Meanwhile, Non Half Hourly customers utilising 'fixed' dimming via electronic ballasts or other static technologies already have the interim solution. This solution uses character 7 of the existing Charging Code structure to indicate one of three levels of dimming. This recently-issued approach will require revision to avoid conflict with the new extended Charging Code. 2. Some of the current Charging Codes have already broken the intended structure of the existing 7 character format. If this CP is accepted we believe that these Charging Codes should be withdrawn 	✓	180

		<p>and re-coded following the implementation of the proposed solution. It is our view that this could bring the Charging Codes back into line.</p> <p>3. It is our view that the Enhanced Control Gear Representation is becoming the primary driver for the extended Charging Code. It is certainly true that rival manufacturers are producing similar ballasts with slightly different circuit wattages. More detailed Charging Codes could facilitate manufacturer's competition and marketing and may have a positive impact in encouraging customers to maximise energy efficiency. However, we cannot envisage many local authorities being able to maintain records of precisely what model of ballast they have installed in order to assign the correct Charging Code. Some local authorities struggle with the current Charging Codes structure and the Proposed Solution is significantly more complex. It is likely that the interpretation and correction of such submissions will increase the administrative burden on UMSOs.</p> <p>4. The longer Charging Code may assist in classifying and coding new UMS equipment in the future. However, Elexon needs to recognise that a vast array of unauthorised, non-UMSUG approved equipment is currently being installed across the UK. In the 'real world' UMSOs and LDSOs have limited control on what specific technologies the customer ultimately connects. The inaccurate inventory declarations and outright omissions resulting, coupled with conflict over non-standard Charging Codes between UMSOs and MAs, causes Settlement error. The impact may prove of a greater magnitude than the Control Gear issue.</p> <p>5. Finally, if significant numbers of applications for new extended Charging Codes are received consideration will be necessary as to how those are progressed through UMSUG meetings. It will also be important to ensure there is always a fully updated, accurate master list available on the Elexon website for download. It is our view that the issue of 'temporary' Charging Codes should be minimised and will require monitoring to ensure such dispensations are not taken advantage of by manufacturers.</p>		
E.ON Central Networks	X	Impact Comment: This will require major IT changes to our Unmetered Supplies Inventory Processing System	✓	180

		<p>Implementation Comment: Time required to order software development and testing.</p> <p>Other Comments: The redlined text lacks clarity on the method of calculation of the EAC through confusion over the use of the terms "Circuit Watts" and "Nominal Watts". See later specific comments.</p>		
Power Data Associates	X	<p>Disagree Change Comment: The CP does not clearly state the purpose of this change, and I do not believe that the ELEXON consultation will have identified the impact on the Lighting Authority inventory systems (demonstrated by a lack of Lighting Authority comments). The drafted text does not address all the required BSCP or Data Catalogue changes as a result of the inclusion of a dimming level.</p> <p>Impact Comment: IT system will need modification</p> <p>Other Comments: Benefit</p> <p>The driver for this change is not clear, since the UMS Dimming work stream was initiated there have been two changes:</p> <ul style="list-style-type: none"> • CP1196 has been approved – allowing the data from Centrally Managed Systems to be included in the settlement calculation, accurately reflecting control the variable dimming and switching, and • The recognition that the current UMS arrangements can accommodate predefined dimming (by time and power level) by appropriate definition of Switch Regimes and Charge Codes. <p>These changes accommodate the majority of the drivers for change originally identified by the UMS Dimming workgroup.</p> <p>The current Charge Codes are assigned in a 'structured' format. In some cases the original structure has been 'abused' to allow new codes to be created for new equipment not originally envisaged. This abuse can continue to allow additional codes for the new equipment entering the market.</p> <p>There are two different business drivers:</p> <ol style="list-style-type: none"> 1 extending the charge code structured format to allow additional equipment to enter the market using distinct codes, 		90

		<p>and</p> <p>2 identifying a dimmed level for fixed dimming equipment on a fixed time regime.</p> <p>This CP as currently drafted does not clearly resolve either of these issues.</p> <p>Impact</p> <p>Extending the charge code field has an impact on all the users of Charge codes, in the BSC framework this includes the UMSO, the Meter Administrator and the Customer. The Customer is required to submit an detailed inventory to the UMSO using the Charge Code – changing the field size therefore affects all the customers. It can be estimated that there are up to 1000 inventories which are large, and therefore use the charge codes. There are tens of thousands which are smaller and may submit a list of equipment that the UMSO then assigns Charge Codes.</p> <p>The larger Lighting Authorities have ‘inventory systems’, of a wide variety of vintages and ages. Some could be simply modified as they use ‘look up tables’, some could never be modified and would need replacement.</p> <p>To mitigate the impact of change on the Customers a constraint was discussed during consideration of this change – but not included in the BSCP520 textual changes – which meant that customers could still submit a detailed inventory using the old format, and the UMSO would add the additional characters when sending to the MA. The MA would only see a charge code in the longer format in all Summary Inventories. This CP does not address the changes to the BSC data catalogue changes required.</p> <p>The mitigation described above does not work when the extra characters are required to differentiate between an existing code and a new code where the original 7 characters are the same. In this situation a customer would have to amend their inventory system to be able to differentiate between the two pieces of equipment.</p> <p>The CP does not address the required modifications to the Operational Information (OI) document to reflect the different approval process for</p>		
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		<p>'dimmable' equipment. It is unclear from the current CP drafting if a new charge code will be added to OI for every 'approved' dimming level. If it is required then the list of codes may increase substantially, the manufacturers testing costs will increase significantly which may lead the process into further disrepute. It seems unnecessary to add a new line in the OI for every possible dimming level when the last three characters are a percentage of the OI stated chargeable watts, therefore adding it to the OI adds no further information.</p> <p>The CP defines limiting the number of dimming levels to a maximum of 10 – there is no reason stated for this. Although the multitude of codes could be the reason, nevertheless a limit of 10 defeats the flexibility that this solution offers.</p> <p>Having extended the charge code to include a percentage dimming field the change does not address how the field is used. The remaining driver for change was the fixed time/dimming level described earlier. However, there is no changes to the BSCP to describe how the UMSO (for NHH) or MA (for HH) would use the values in combination with a Switch Regime. This needs to be defined.</p> <p>The CP does not address the change required to the definition of the data item (or creation of a new data item): National Equipment Code in the SVA Data Catalogue.</p> <p>Consultation</p> <p>Unmetered is different to most aspects of the BSC arrangements as it has a direct interaction on customers. This change has a significant impact on customer systems. Without customers making associated changes the change will not be effective. Unless there is significant response to this CP from customers agreeing to this change it can be assumed that customers are unaware of the proposals. It would be appropriate for ELEXON to make every effort to contact customers making them aware of the change, and the potential impact on their systems, compared to the benefits to be sought.</p>		
Gemserv	-	-	X	-

E.ON UK Energy Services Limited	-	-	-	-
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Comments on redline text

No.	Organisation	Section	Comment
1	E.ON Central Networks	1.7.2 Definitions – Percentage Dimming Level	My understanding is that the Percentage Dimming Level (digits 11, 12, & 13) should be applied to the circuit wattage of the lamp not to the nominal wattage. e.g. a 70 watt SON will have a nominal rating of 70 watts but multiple circuit watt ratings depending on the control gear installed (digits 7, 8, 9, 10) The definition of Percentage Dimming Level is therefore incorrect.
2	E.ON Central Networks	4.4.1	The switch regime defines whether or not the equipment is subject to dimming, the addition of dimming is unnecessary unless all references to switch regime are changed to switch/dimming regime.
3	E.ON Central Networks	4.5.2.1	Again lacks clarity because of the use of the term nominal when talking about circuit watts.
4	Power Data Associates	BSCP520 4.5.2.3	It is redundant to add the percentage dimming level to the Charge Code part of this field. The file already contains specific field for percentage dimming. Adding it to this flow is not necessary, and confusing. The