



## Change Proposal Circular – Collated Responses for CPC00716

### CPC00716: Impact Assessment of CP1377

#### Responses for CP1377: Clarifying rules on Third Party Access on Licence Exempt Distribution Network

##### Summary of Responses for CP1377

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Meter Operators	Yes	Yes	n/a
EDF Energy	Supplier, NHH / HH Agents	Yes	Yes	182
Electricity North West Limited	Distributor	Yes	Yes	30
GDF SUEZ Marketing Ltd	Supplier	Yes	Yes	n/a
npower	Supplier and Supplier Agents (NHH and HH)	Yes	Yes	90
ScottishPower	Supplier, Distributor, HHDC, MOp	No	Yes	180
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	Yes	Yes	30
Western Power Distribution	Distributor	Yes	Yes	n/a

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**Any Questions**

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Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	Yes	Yes	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> Meter Operators</p> <p><b>Please state what the impact is</b> – n/a</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> n/a</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments :</b></p> <p>Unfortunately due to holidays, I have not had time to fully consider each of the CPs. However they do have impact on MOs. If you inform me of the next meeting I would like to attend, if possible.</p> <p>I have previously made representations on the 'third party access' CP that a single 'controlling mind' MO is essential if complex sites using difference metering is used. My reasons are:</p> <ol style="list-style-type: none"> <li>1 Each customer can select their own supplier <ol style="list-style-type: none"> <li>a. This is essentially the purpose of the third party access</li> </ol> </li> <li>2 Each supplier must appoint the same common HHDC <ol style="list-style-type: none"> <li>a. A single HHDC is essential, so that they can read the 'total meter' and each sub-meter – then deduct each sub-meter from the total to make the residual for the landlord, while passing on the consumption on each sub-meter trading independently to the relevant customers. The HHDC can also estimate missing data in the full knowledge of the impact on the total site. The sum of the estimates</li> </ol> </li> </ol>

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			<p>would not be expected to exceed the 'total meter'.</p> <p>3 Each supplier must appoint the same common HHMO, a single HHMO is essential to ensure:</p> <ol style="list-style-type: none"> <li>A single HHMO has an understanding of the electrical network of the whole site to ensure that all electrical supplies are accounted for – do not want any of the installation missed from settlement or double counted. Particularly relevant when different operating regimes of the electrical network can result in different flows of energy (e.g. HV rings, LV back feeds)</li> <li>The one HHMO 'controlling mind' can manage different sub-deduct meters within the site being added, or disconnected or combined. Every MPAN in the site needs to be included in the single 'complex site' form. Any sub-deduct metering within the site which is connected, de-energised or disconnected needs to be correctly identified in the complex site form, otherwise under/over counting in settlement may occur. The effective from date of the complex site form is an essential method of managing the timing of changes</li> <li>One HHMO being accountable for the site ensures that the BSC Parties, and TAA, can attribute errors or omissions to a single HHMO and/or HHDC rather than each party blaming another.</li> <li>Single parties ensure more effective communication of changes.</li> </ol> <p>On that basis support CP1377, whilst rejecting CP1378.</p> <p>The group should also consider if there are need to change the Metering CoPs. Through recent discussion with BSC representatives it became apparent that CoP5 Appendix A point 7 refers to 'Licensed Distribution System'. The definition of Licenced Distribution System and Distribution System within the BSC are significantly different and in this context it would appear that third party</p>

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			<p>access would be better accommodated if the CoPs used the term Distribution System.</p> <p>For the similar reasons I think need to be careful over the use of the term Associated Distribution System – which would appear to cover the situation where all supplies in a block of flats are separately metered and registered in a registration system. But the risers and laterals within the building are privately owned and therefore form an unlicensed distribution system. These are very common. If a CoP10 meter were to be installed in the spa, pool, or laundry within the building CoP3, 5 &amp; 10's use of the term 'Licenced Distribution System' would appear to prevent this without a dispensation. This is not logical, or sustainable.</p> <p>The BSC allows for the publication of Draft CPs, these are less commonly used in recent years, but give an effective method of raising issues which are complex, new and may require further amendment prior to formal approval. Clearly the opportunity for SVG to amend the CP is very limited. It would probably have been worthwhile to have gone through a DCP stage first.</p>
EDF Energy	Yes	Yes	<p><b>Agree change comment – Yes</b></p> <p><b>For which role is your organisation impacted?</b> HH MOP</p> <p><b>Please state what the impact is –</b> Minor</p> <p><b>Lead time comment -</b> 182</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> - See Question 3</p> <p><b>Associated costs comment –</b> We do not have any information on associated costs</p> <p><b>Any other comments:</b></p> <p>We would ask for clarification if the customer meter in this scenario has to be a HH meter – regardless of the load being used – to enable the necessary subtractions to take place at the</p>

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			<p>boundary. It's not implicitly clear that this is the case</p> <p>We would also seek clarification in terms of scope; the changes to regulations that came in last November don't appear to restrict the type of customer on the private network that can take a competitive supply e.g. does a big house with a single NHH landlords supply split into multiple bedsits have to offer a 'competitive supply' if one of the tenants requests it – in which case where is the NHH scenario in the BSCP?</p>
Electricity North West Limited	Yes	Yes	<p><b>Agree change comment – Yes</b></p> <p><b>For which role is your organisation impacted?</b> Distributor</p> <p><b>Please state what the impact is –</b></p> <p>We will need to know the number of customers on the Private Network who have appointed their own Supplier so we have an understanding of what data we will be receiving. This information will allow us to assess the impact on our DUOs tariffs and charging methodology.</p> <p><b>Lead time comment –</b></p> <p>Clarifying the rules has no major impact. The current processes to support Third Party Access on Private Networks are still at a high level and end to end processes need to be developed with ownership and timescales. If the solution for new Meter Timeswitch codes and Line Loss Factors are required this is at least a 6 week lead time to implementation dependent on the Market Domain schedule.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b></p> <p>No, we would require a business workaround in place until the Third Party Access Working Group concluded impacts and changes required had been raised and gone through relevant change</p>

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			<p>process.</p> <p><b>Associated costs comment –</b></p> <p>Until there is a full understanding of the end to end process and solution and this has gone through the relevant change process we will understand the full costs.</p> <p><b>Any other comments –</b>None</p>
GDF SUEZ Marketing Ltd	Yes	Yes	<p><b>Agree change comment –</b> Yes</p> <p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b></p> <p>This will enable us to facilitate the supply to customers on a Licence Exempt Distribution Network that wish to make use of Third Party Access.</p> <p><b>Lead time comment –</b></p> <p>We are already looking to use this process for customers who wish Third Party Access or who own a Licence Exempt Distribution Network that covers supplies to wish to have Third Party Access arrangements.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b></p> <p>We support this CP being implemented in the earliest possible release.</p> <p><b>Associated costs comment –</b> No associated cost.</p> <p><b>Any other comments –</b> n/a</p>

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npower	Yes	Yes	<p><b>Agree change comment – Yes</b></p> <p><b>For which role is your organisation impacted?</b> Supplier, HHDC, MOA</p> <p><b>Please state what the impact is –</b></p> <p>These changes may result in requirements to change processes internally.</p> <p><b>Lead time comment - 90</b></p> <p>We support implementation in the November 2012 release, providing this is confirmed at the next SVG. If this cannot be confirmed at Septembers SVG we would propose delaying until February.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b></p> <p>Providing this is confirmed at the next SVG no adverse impact is expected. However if this cannot be confirmed at Septembers SVG we would propose delaying until February to ensure all related processes can be reviewed and modified where necessary.</p> <p><b>Associated costs comment – Unknown at present</b></p> <p><b>Any other comments –</b></p> <p>Further discussions will be needed to clarify the application of DUoS and as to how the losses should be handled.</p> <p>During the review of the red line changes a potential inconsistency was identified:</p> <p style="padding-left: 40px;">The section titled 'Export on Licence Exempt Distribution Network' references on page 4 of the BSCP redline states that 'If Total Boundary Demand is positive then the Boundary Point Supplier is a net Importer, and the Total Boundary Demand should be entered in Settlement as a positive quantity of Active Import.' This seems to contradict a statement in the current BSCP not amended in the redline version, 'The HHDC is required to establish gross energy for the site for each settlement period. This is achieved by applying the aggregation rule to</p>

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			the metered data values. If the resultant value applied to the rule positive, the site is exporting, and the import value is zero.'
ScottishPower	No	Yes	<p><b>Agree change comment – No</b> While we agree with the change in principle, we believe that customers should have the right to choose their own MOA. We also believe that the provision of the meter is not the most important element of the change, the most important is to maintain the integrity of the settlement process.</p> <p><b>For which role is your organisation impacted?</b> Distributor, Supplier, HHDC</p> <p><b>Please state what the impact is –</b> HHDC will require to have in place processes that will allow them to provide both the Supplier and Distributor with accurate information which will enable them to bill their customer accordingly. We believe that difference metering, even though this will require a metering dispensation, is the most appropriate way forward. From a Distribution point of view we would expect to see MPIDs in respect of both the Exempt Network Operator and the customer(s) who have opted to appoint their own supplier. Such a split will allow the correct DUoS charges to be applied to each relevant supplier. This split would also allow each Supplier to receive accurate information on behalf of their respective customers and enable them to provide accurate Supply bills.</p> <p><b>Lead time comment – 180</b> Given that there may be some system changes required our preference is to have a 6 month lead time prior to the change going live.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact.</p> <p><b>Associated costs comment – n/a</b></p>

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			<p><b>Any other comments –</b> Regardless of who is appointed as MOp it is essential that all due processes should be applied. By due process, we would expect the site to have an appropriate settlement mpan, which will allow DUoS charges etc. to be applied correctly. In addition we need to ensure that any CT's/VT/Multi-core requirements meet the relevant Code of Practice and that test certificates are provided for the CT/VT ratios in order to avoid any non-compliance at future TAA audits.</p>
TMA Data Management Ltd	Yes	Yes	<p><b>Agree change comment –</b> Yes  <b>For which role is your organisation impacted?</b> HHDC  <b>Please state what the impact is –</b> Procedure impact  <b>Lead time comment -</b> 30  <b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No  <b>Associated costs comment –</b> Low cost  <b>Any other comments –</b>n/a</p>
Western Power Distribution	Yes	Yes	<p><b>Agree change comment –</b> Yes  <b>For which role is your organisation impacted?</b> LDSO  <b>Please state what the impact is –</b>  Distribution will need to issue MPANs for customers on private networks who want to contract direct with a Supplier. It is vital that the arrangements for settling these MPANS are robust and that the arrangements ensure that Distribution DUoS income is not under recovered due to failures in the process. Appointing a single MOA to all sites on the same embedded network will mean there is a single party responsible for METDS and should help ensure the Data Collector has a full picture of</p>

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			<p>the settlement requirements for each embedded connection.</p> <p><b>Lead time comment –</b> No change to current processes</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation? - No</b></p> <p><b>Associated costs comment –</b> No costs</p> <p><b>Any other comments –</b>No</p>

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Comments on the redline text CP1377					
No.	Organisation	Document name	Location	Severity Code	Comments
1.	npower	BSCP502	Page 4	L	During the review of the red line changes a potential inconsistency was identified: The section titled 'Export on Licence Exempt Distribution Network' references on page 4 of the BSCP redline states that 'If Total Boundary Demand is positive then the Boundary Point Supplier is a net Importer, and the Total Boundary Demand should be entered in Settlement as a positive quantity of Active Import.' This seems to contradict a statement in the current BSCP not amended in the redline version, 'The HHDC is required to establish gross energy for the site for each settlement period. This is achieved by applying the aggregation rule to the metered data values. If the resultant value applied to the rule positive, the site is exporting, and the import value is zero.'
2.	npower	BSCP514	Page 4	L	During the review of the red line changes a potential inconsistency was identified: The section titled 'Export on Licence Exempt Distribution Network' references on page 4 of the BSCP redline states that 'If Total Boundary Demand is positive then the Boundary Point Supplier is a net Importer, and the Total Boundary Demand should be entered in Settlement as a positive quantity of Active Import.' This seems to contradict a statement in the current BSCP not amended in the redline version, 'The HHDC is required to establish gross energy for the site for each settlement period. This is achieved by applying the aggregation rule to the metered data values. If the resultant value applied to the rule positive, the site is exporting, and the import value is zero.'

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