

# CP Consultation Responses

## CP1431 'Extend Site Check Exemption to Measurement Classes F and G'



This CP Consultation was issued on 9 March 2015 as part of CPC00754, with responses invited by 2 April 2015.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC
IMServ Europe	0/3	HHDA, HHDC, HHMOA
ScottishPower	5/13	Distributor, Generator, Supplier, Supplier Agents
SSE Energy Supply Limited	4/6	Supplier, NHHDC, NHHDA, NHHMOA
British Gas	5/0	Supplier
RWE npower Ltd	7/14	Generator, Supplier, Supplier Agent
EDF Energy	5/14	Generator, Supplier, Consolidator, ECVNA, MVRNA, CVA MOA, HHDA, HHDC, HHMOA, NHHDA, NHHDC and NHHMOA
Stark Software International Ltd	0/4	HHDA, HHDC, NHHDA, NHHDC

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✓	✓	✓
IMServ Europe	✓	✓	✓	✓
ScottishPower	✓	✗	✗	✓
SSE Energy Supply Limited	✓	✓	✓	✓
British Gas	✓	✓	-	✓
RWE npower ltd	✓	✗	✗	✓
EDF Energy	✓	✗	✗	✓
Stark Software International Ltd	✓	✓	✓	✓

## Question 1: Do you agree with the CP1431 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	It makes sense to align site visits requirements for Measurement Classes F and G to the requirements for Measurement Class E.
IMServ Europe	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
EDF Energy	Yes	-
Stark Software International Ltd	Yes	See Qu 6

## Question 2: Do you agree that the draft redlining delivers the CP1431 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
IMServ Europe	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
EDF Energy	Yes	-
Stark Software International Ltd	Yes	See Qu 6

## Question 3: Will CP1431 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
5	3	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Small impact on procedures and systems
IMServ Europe	Yes	<p>We currently perform site inspections on all Measurement Class 'E' sites due to the small number of sites involved. In order to prevent this activity, and to further exclude MC F and G, we estimate around 15 working days effort to update our systems and processes</p> <p>Given the short timescales between these CPs being approved and the proposed implementation date, we have carried out a detailed analysis of the impact on our HHDC/DA activities in order to be confident the above estimate is accurate.</p>
ScottishPower	No	-
SSE Energy Supply Limited	Yes	-
British Gas	Yes	We anticipate low impact system changes will be required
RWE npower ltd	No	-
EDF Energy	No	-
Stark Software International Ltd	Yes	See Qu 6. Site visits procedures will need to change to allow the MC to be established as it is currently ignored.

## Question 4: Will your organisation incur any costs in implementing CP1431?

### Summary

Yes	No	Neutral/No Comment	Other
4	3	1	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The costs that we would incur with the implementation of CP1431 are small.
IMServ Europe	Yes	As per Question 3, there will be a one off development cost to update our HHDC systems to support this change requiring 15 days of effort.
ScottishPower	No	-
SSE Energy Supply Limited	Yes	-
British Gas	-	-
RWE npower ltd	No	-
EDF Energy	No	-
Stark Software International Ltd	Yes	One off costs. Two man days.

## Question 5: Do you agree with the proposed implementation approach for CP1431?

### Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
IMServ Europe	Yes	-
ScottishPower	Yes	-
SSE Energy Supply Limited	Yes	-
British Gas	Yes	-
RWE npower ltd	Yes	-
EDF Energy	Yes	-
Stark Software International Ltd	Yes	But see Qu 6.

## Question 6: Do you have any further comments on CP1431?

### Summary

Yes	No
1	7

### Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	-
IMServ Europe	No	-
ScottishPower	No	-
SSE Energy Supply Limited	No	-
British Gas	No	-
RWE npower Ltd	No	-
EDF Energy	No	-
Stark Software International Ltd	Yes	<p>HHDC is only aware of the Measurement Class from flow D0289 and is treated as non-mandatory. The current visit exemption for MC=E is currently ignored by Stark, as known cases represent only 0.5% of Stark's portfolio.</p> <p>With P272 and the higher volumes expected, there is a clear need to establish MC more definitively – perhaps by making provision of the MC within a D0289 mandatory.</p>