

P280 New Measurement Classes

Consultation issued on 13 February 2012

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
TMA Data Management Ltd	0/1	NHHDC, NHHDA, HHDC and HHDA
Western Power distribution	4/0	DNOs
UK Power Networks plc	4/0	Distributors
Haven Power Ltd	1/0	Supplier
GTC	1/0	Distributor/ IDNO
ScottishPower	3/1	Distributor, Supplier and Party Agent
Northern Powergrid	2/0	?
Siemens Metering, Communications & Services	0/1	Party Agent
IMServ Europe Ltd	0/5	HHDC and DA, NHHDC and DA, MOP
Electricity North West	1/0	Distributor
SSE PLC	6/0	Supplier/Generator/ Trader / Party Agent / Distributor
British Gas	1/0	Supplier
E.ON UK	5/0	Supplier
EDF Energy	10/0	Supplier / Party Agent / Consolidator / Generator / Exemptable Generator / Trader
RWE npower Limited	9/0	Supplier and Party Agent

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: What would be the impact on your organisation of continuing to settle on a site-specific basis if the number of half-hourly sites below 100kW increases? Respondents should focus on the impacts related to site-specific billing of distribution charging, in line with the purpose of this modification.

Responses

Respondent	Response	Rationale																									
TMA Data Management Ltd	No	There would be no impact on our systems or procedures, as Half-Hourly sites below 100KW would simply be treated the same way as Half-Hourly sites above 100KW.																									
Western Power distribution		<p>If this situation was allowed to continue uncapped and unlimited then ultimately we would need to be able to generate approximately 7.5 million site specific bills and supercustomer billing would become obsolete. Our systems would also need to be able to store the HH meter data for all 7.5 million customers for up to 10 years. This would also have an impact in terms of the size of building needed to house many extra servers and extra staff to maintain those servers. We would also be in a perpetual billing situation, as it currently takes approximately 7.5 hours to process and generate the bills for 30,000 site specific customers. We would need approximately 1875 hours, or 78 days, to generate the bills for all customers for each month. There would then be queries which would increase potentially 375-fold and corrections to invoices which would, in theory, increase by a similar amount. There is insufficient time in the month.</p> <p>We believe that this situation would be in contravention of BSC objective c – the efficient management of settlements.</p>																									
UK Power Networks plc		<p>Our HH DUoS billing systems (one IT system per distribution area) has a finite capacity.</p> <table><tr><td></td><td>EPN</td><td>LPN</td><td>SPN</td><td>Total</td></tr><tr><td>Existing HH</td><td>13,000</td><td>15,000</td><td>7,000</td><td>35,000</td></tr><tr><td>PC5-8</td><td>20,500</td><td>11,500</td><td>13,000</td><td>45,000</td></tr><tr><td>Available for PC1-4</td><td>16,500</td><td>23,500</td><td>30,000</td><td>70,000</td></tr><tr><td>Total</td><td>50,000</td><td>50,000</td><td>50,000</td><td>150,000</td></tr></table>		EPN	LPN	SPN	Total	Existing HH	13,000	15,000	7,000	35,000	PC5-8	20,500	11,500	13,000	45,000	Available for PC1-4	16,500	23,500	30,000	70,000	Total	50,000	50,000	50,000	150,000
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Existing HH	13,000	15,000	7,000	35,000																							
PC5-8	20,500	11,500	13,000	45,000																							
Available for PC1-4	16,500	23,500	30,000	70,000																							
Total	50,000	50,000	50,000	150,000																							
Haven Power Ltd	Yes	<p>Given there is a firm deadline in place for smart metering roll out there is limited scope to manage the rate at which sites below 100kW with HH capable metering increase; or ensure the monetary and human resource is available to cope with the necessary system developments, increased volume of data, and increase in metering issues that will arise. Interoperability between agents is still poor and in some instances requires intensive Supplier involvement to resolve issues with retrieving the HH data. The continued issues with interoperability and data retrieval will also affect the efficiency and accuracy with which a Supplier can invoice the customer.</p> <p>These factors, coupled with the inability to predict</p>																									

Respondent	Response	Rationale
		what the costs to individual DNOs will be and the proportion that will be passed through will put a significant strain on suppliers medium to long term. This will impact on Applicable BSC Objectives (c) as the strain will be acutely felt by suppliers with limited cash reserves, affecting their ability compete with their larger more resilient competitors; and also (b) as the costs involved for customers will be disproportionate compared with the perceived benefits that smart metering is expected to bring.
GTC		An increase in HH sites below 100KW would not cause us any additional issues, in terms of billing. Our billing system is robust enough to cope with the additional HH sites.
ScottishPower	Yes	<p>In the initial stages of the transition period we would not envisage any serious issues of continuing to settle customers on a site specific basis, however as customer numbers increase there will come a point where we will have to make significant changes to our systems to the extent that they would have to be replaced.</p> <p>From a Distribution perspective at present the number of customers billed on a site specific basis total around 11,500 and our DUoS Billing application has been developed to fit this volume. There is spare capacity available but this is limited to reasonable levels of increase. The possibility of hundreds of thousands of additional "HH Settled" Customers would render our current system inoperable, both from a receipt of flow perspective as well as memory and billing run-time capacity. We are awaiting full impact analysis from our Supplier but effectively we would need to replace it along with all current IT infrastructure to accommodate any significant increase in volumes. We believe we are looking at one off cost of £1m-£2m. With increased ongoing annual support costs of around £100k-£200k.</p> <p>Our existing Supplier and Settlement systems are also built to handle a limited number of sites. An increase in the number of sites using site specific data flows and distribution charging would place significant additional requirements on these systems and also lead to an increase in the number of staff required to validate individual invoices received from Distributors. As stated above this would be a progressive impact as the number of HH sites below 100kw increases. There would also be significant costs associated with a large scale migration of sites moving from NHH to HH Settlements.</p>
Northern Powergrid		Depending on the increase in volume of sites below 100kW settled on a site specific basis, Northern Powergrid would need to carry out IT changes. This would involve either enhancing its existing billing database or developing a new billing database altogether.
Siemens Metering, Communications	N/A	N/A

Respondent	Response	Rationale
& Services		
IMServ Europe Ltd		Based on the assumption that this question relates to parties involved in the process of Distribution charging we can confirm that we are not affected by this change.
Electricity North West		<p>Under current DUoS Charging arrangements we are likely to be able to handle double the amount of HH site specific bills with minimal impact on system or business. This may therefore cater for the majority of P272 (mandating HH settlement for Profile Class 5-8 customers) but if this expands to the Domestic and SME market (via DCP103 which also includes PC5-8 customers) there will be a major impact on how we need to handle and process meter advances and how we bill DUoS.</p> <p>By the end of the smart metering roll out we will have to bill 2.3m customers on a site specific monthly basis, based on 2.3m data flows being received on a daily basis. Our current practice of allowing into the billing system and processing such data to produce a bill will no longer be practical. To do so would result in a lack of data storage, batch run times being significantly extended and no doubt knock-on effects to other processes being impacted while the billing batch continues to run in the background. We would need to look at data warehousing, linked to the billing system and the interaction and processing of such data. In our opinion such an approach is not economical. The cost of not supporting this Modification i.e. no change to the current BSC would be in the millions of pounds rather than in the tens/hundreds of thousands of pounds dependent upon the end solution.</p> <p>Notwithstanding the one off costs of procuring an IT solution to undertake DUoS billing there is likely to be an increase in business resource to manage through any data inconsistencies that prevent billing taking place. We have no idea at this stage as to what such an impact will be, but hope that it does not reflect a straight line increase based on the current levels of staff to raise and process the circa seven thousand HH bills. How we expect the system to produce a D2021 (e-bill) with 2.3m MPANS in and the suppliers to process it is also an issue. We have received concerns from Suppliers via various change proposals looking at the current time allowed validating the e-bills with only 7,000 MPANS in. How validation will take place with 2.3m records will only increase this concern.</p> <p>Do we really want circa 46m data flows (we have circa 10% of the number of MPANS, and the D00275 data flow goes to both the supplier and distributor) being sent out by HHDCs each and every day? If the D0036 and the D0275 are sent out then we could double this. This is just one such data flow requirement. There will be impacts across each Supplier and Agent in receiving, storing and processing such data not to mention the service provider sending such data.</p>

Respondent	Response	Rationale
		<p>The introduction of smart metering and the availability of HH data mark a sea change in the way we need to receive and process data. Without this change to the BSC we would be embarking on wholesale system and business re-engineering together with potential code re-writes over the next few years. The cost to the industry overall will be far in excess of the proposed solution.</p> <p>This would be detrimental to BSC objective (c) (the promotion of effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity). Without change there will be considerable cost to bear on existing market players and it may be conceived as being a cost hurdle too high for new market entrants both on supply and distribution.</p> <p>Likewise Objective (d) (the promotion of efficiency in the implementation and administration of the balancing and settlement arrangements) is questioned. Whilst it is understood that HH data will improve the accuracy of settlements, the amount of data to process on a site specific basis would make it more inefficient for the industry overall. Such accuracy coming at a cost that is not justifiable.</p>
SSE PLC		<p>On the assumption that the current HH market arrangements would prevail, there would be a significant impact to our organisation if the number of sites that were processed under half-hourly site-specific billing were to increase.</p> <p>There would be a significant increase in resources required to handle the increase in site-specific invoicing, as well as the requirement to upgrade existing systems. Associated to site-specific billing, there would be increases in the volume of data flows which will impact current systems along with associated DTN charges. We would also see increases in agency costs, greater pressures and potential increased costs in meeting industry performance criteria. Due to increased pressure on HHDC/DA there maybe impacts on the quality and accuracy of the HH data within the market.</p>
British Gas		<p>As suppliers we would incur additional costs relating to site specific Duos bill validation.</p> <p>In our P272 response we stated that we believe to support all our profile class 5-8 customers on a HH basis would costs between £200 - £300k to increase the capacity of our duos validation system.</p>
E.ON UK		<p>E.ON validates all site specific DUoS costs on a site by site basis. If the basis of the charging was premised on the current methodology then an increase in the number of sites being invoiced in a site specific way via a D2021 would not immediately impact the functionality of our systems. There would be increased resource requirements to analyse and resolve instances where invoices fail validation.</p> <p>If the charging components of this group of MPANs</p>

Respondent	Response	Rationale
		were to change – say billing only standing and unit charges – we would need to be able to indentify these within the structure of the data sent to us. Normally this would be done via the LLFC. As long as the LLFC identified the <100kW customers then our system could cope.
EDF Energy		<p>For our anticipated share of sites currently in PC5-8 and to a certain extent beyond that, we would have no particular difficulties using existing HH processes including site-specific DUoS billing. Current PC5-8 only would involve a market share of a total of about 164,0000 additional sites over and above about 114,000 currently, perhaps a multiplication by 2.5 of the number of sites potentially settled HH. We could accommodate this number without major revision to systems and processes.</p> <p>For significant numbers over and above those currently in PC5-8, major changes to our existing systems and processes would be required to accommodate HH settlement, including those concerned with receiving and handling meter and settlement data, validating and settling DUoS bills, and recovering DUoS costs within customer forecasting, pricing and billing.</p>
RWE npower Limited		Should this modification not be implemented and the Distributors are required to amend their billing systems, this would be at a cost to the Distributor. However, should this modification be implemented, Suppliers and Party Agents would need to make changes to a large number of systems to be able to manage the new Measurement Classes proposed at a sizable cost. Suppliers would also still be able to keep customers on Measurement Class E which would still require Site Specific Billing from the Distributor.

Question 2: What costs would your company face if the number of sites settled on a half-hourly basis increase in line with the scenarios below? Respondents should focus on the impacts related to site-specific billing of distribution charging, in line with the purpose of this modification. Please provide a detailed breakdown of costs wherever possible, specifying whether these are one-off or on-going costs. Please also explain the assumptions underlying your costs estimates

- Increase of 30% HH Settled customers below 100KW
- Increase of 50% HH Settled customers below 100KW
- Increase of 75% HH Settled customers below 100KW

Summary

Additional Costs	No Costs	Neutral/Other
10	3	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No Costs	There would be no additional cost due to site-specific DuoS charges to the existing costs of increasing the number of Half-Hourly sites following the installation of Smart Metering.
Western Power distribution	Additional Costs	<p>This would be approximately 39,000 site specific bills, we think the system would cope, billing time would increase to 10 hours and queries would increase by 30%.</p> <p>This would be approximately 45,000 site specific bills. Increased server capacity would be required, approximate cost of this is £40,000. Reports would run more slowly causing issues with timescales for producing any regulatory information. With this volume of data some of the ancillary databases we have would be unable to cope and we would need to build new ones. Need for an additional 0.5 FTE to cover increase in queries, cost approximately £12.5k.</p> <p>This would be approximately 52,500 sites, processing time would increase to approximately 20 hours due to the whole system running more slowly given the volumes it's having to process. Hopefully the increase in server capacity to cope with option 2 would cover this subsequent increase. Need for an additional 1 FTE to cover increase in queries, cost approximately £25k.</p> <p>We are not sure that the increase in volumes would necessarily be based on the current number of HH metered customers, the availability of smart metering in different parts of the country and the willingness of customers to take up HH billing may mean that a particular DNO ends up being the favourite area for all suppliers and other DNO areas are left alone. In addition if an alternative solution is not devised then suppliers will have no choice but to continue to register smart metered customers through HH settlements and this would cause the increases to be many-fold as opposed to a fractional increase.</p>
UK Power Networks plc	No Costs	Our HH DUoS systems have the capacity to accommodate up to 50,000 MPANs per region. As the requirements currently stand we would not need to undertake any IT system changes if the existing HH volumes increased by 75%
Haven Power Ltd	N/A	N/A
GTC	Additional Costs	
ScottishPower	Additional Costs	<p>The Distribution business has assumed that the percentages provided relate to their total NHH Portfolio of 3.5m MPANs. In even the best case (lowest impact) scenario we would see an increase of 1m HH Records and therefore 1m additional D0036 Flows every day and 1m additional HH Site Specific Invoices per month. This requires a resizing of system of approx x100 and I would refer you to our response to Q1 for likely costs.</p> <p>From a Supplier perspective it is estimated that the number of MPANs and associated volumes that the Supply Settlements systems could potentially have to process would increase by a factor of x250.</p>

Respondent	Response	Rationale
		<p>This will lead to an increased number of HH sites that staff would have to maintain and could proportionally lead to an increased number of discrepancies that staff would have to manage. To help assist with this it is expected to develop new functionality to validate smart HH data to allow more efficient discrepancy management.</p> <p>The cost for software change on the Settlements side is currently estimated to be within the range of a £150,000 - £450,000 one off cost. This would require a development time of up to 24 months.</p> <p>Significant software and hardware upgrades are envisaged unless the business approach to loading and validating the data in Settlements systems is changed.</p>
Northern Powergrid	Additional Costs	<p>If this question is based upon current HH settled site specific customers, then the below volumes would be seen for Northern Powergrid.</p> <ul style="list-style-type: none"> - Increase of 30% HH Settled customers below 100KW = approximately additional 4,400 customers settled HH within our site specific billing systems - Increase of 50% HH Settled customers below 100KW = approximately additional 7,300 customers settled HH within our site specific billing systems - Increase of 75% HH Settled customers below 100KW = approximately additional 10,900 customers settled HH within our site specific billing systems <p>Whilst Northern Powergrid cannot quantify formal costs in this area, however additional server space and database changes would be required costing in the region of between £25k to £50k.</p>
Siemens Metering, Communications & Services	Additional Costs	<p>As a Party Agent we are not directly impacted by the site specific distribution charging. However, the costs that would be associated with these volume increases for us as a HHDC/DA would relate to:</p> <ol style="list-style-type: none"> 1) Increased DTN costs for new, additional data flows 2) Hardware costs for additional data storage 3) Staff costs for additional employees (estimate that 1 additional full time employee would be required for the 30% increase, 2 for 50% and 3 for 75%).
IMServ Europe Ltd	N/A	<p>Based on the assumption that this question relates to parties involved in the process of Distribution charging we can confirm that we are not affected by this change.</p>
Electricity North West	No Costs	<p>Our response is based on the following interpretation of the question. The scenarios are based against current volumes of HH sites and not against the number of sites below 100kW in our GSP area.</p> <p>Under current DUoS Charging arrangements we suspect that we may be able to handle double the amount of HH site specific bills with minimal impact on system or business i.e. 7,000 to 14,000 sites.</p>
SSE PLC	Additional Costs	<p>From previous assessments of the impacts to implement changes P272 and DCP103, and assuming the same rationale that just PC5-8 became 'site-specific' billed the impact was quantified to be as follows:</p> <p>Initial costs: To facilitate the increase in number of half-hourly sites there would be costs of £245,000 to</p>

Respondent	Response	Rationale
		<p>cover system changes and operational costs. In addition to these costs there would be further additional costs for implementing the changes that can not be established before knowing what the final system requirements will be.</p> <p>Ongoing costs: Assuming that current 'site-specific' DUoS billing arrangements remain in place, the ongoing additional costs to our supply business would be circa £250,000 per annum.</p> <p>Other costs: Any additional Agency costs for customers trading HH have yet to be confirmed. There would likely to be the requirement to increase Manpower by x68 (6800%) to enable the processing of the site-specific invoices. This would equate to an additional cost of around £5,400,000.</p> <p>Whilst there would be some economies in scale, there would be the requirement to increase manpower elsewhere within the business.</p> <p>Scenario 2: Increase of 50% HH Settled customers below 100KW</p> <p>This would require an increase of x113 (11300%), equating to £9,000,000.</p> <p>Scenario 3: Increase of 50% HH Settled customers below 100KW</p> <p>This would require an increase of x170 (17000%), equating to £13,600,000.</p> <p>The above costs are purely direct manpower costs. For each scenario there would be further facilities requirements for the increase of FTE. This would include, office space, hardware, supporting facilities infrastructure etc. To estimate these costs would take considerable time and effort.</p> <p>There will also be significant additional IT system/resource costs. Of which some indication has been highlight above.</p>
British Gas	Additional Costs	<p>It's clear that we need to scale up our existing systems to accommodate any increase in the number of site specific invoices we would receive.</p> <p>At this stage it's not clear how much cost and effort would be required to implement this change. Our IS team would need to know how the invoice flows would be sent to us, would this be an Electralink D20/21 file? Would we need to make changes to the validation and how would we manage the increase in HH consumption data? Would the invoices be paid in the same way as e-billing?</p> <p>At one end of the scale we might be able to get away with adding a bit of storage to our existing systems and cope with a decrease in system performance due to the increased volumes of data. At the other end of the scale we might have to ramp up the hardware and software significantly and implement a lot of system changes.</p> <p>As moving to HH settlement for sub 100kw is elective the decision to migrate customers would be a commercial one for suppliers. In theory the introduction of new measurement classes to facilitate aggregated HH Duos bills should reduce costs for suppliers validation systems.</p>
E.ON UK	Additional	

Respondent	Response	Rationale
	Costs	
EDF Energy	Additional Costs	<p>30% / 50% / 75% by number of below 100kW sites (total 29 million) is about 9m/15m/22m respectively in total, a multiplication by about 80-200 of the current number of sites settled HH, about 0.1 million. Any of these scenarios would require a major revision of all our supply business systems and processes used for such sites, of which the DUoS billing component would be only a part.</p> <p>Even without functional changes, significant upgrades of system storage and processing capacity would be required to support the volume increase and to maintain performance. It is very likely that more fundamental design changes would be necessary to maintain performance with this level of capacity increase. A full assessment would itself carry significant cost, and is not a priority at this time. At a high level, there seems little doubt that the cost would be many tens of millions of pounds, possibly more, depending on how well the detailed changes co-ordinate with existing design features. Changes could not be achieved quickly. Note this would represent a cost measured as a few pounds to tens of pounds per customer site.</p> <p>The proposed changes to the handling of DUoS billing, reporting, and processing would preferably be considered as part of a larger project on increasing HH capability. Taken in isolation the costs of introducing new Measurement Classes and consequent impact on registration, CoMC, settlement, billing and other processes would still be measured in many millions of pounds, and in isolation would distract resource from other important developments on improving systems and processes and preparing for smart metering</p>
RWE npower Limited	Additional Costs	There would be increased costs of maintaining systems to manage and increase in HH Settled customers but these costs would be manageable.

Question 3: Do you agree with the proposed criteria for separating the new Measurement Classes based on whether the site is Domestic, Non domestic whole current or Non domestic CT metered?

Summary

Yes	No	Neutral/Other	No response
10	5		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	One additional Measurement Class should suffice.
Western Power distribution	Yes	This seems to be the only practical approach, even if from a pure load or maximum demand point of view it causes some oddities where you would expect them to be classed as a different Measurement Class. Any

Respondent	Response	Rationale
		definition will cause some strange sites, and maximum demand is too volatile to use as a basis for separation.
UK Power Networks plc	Yes	Yes
Haven Power Ltd	Yes	Whilst we feel that this is a sensible split we are aware that there may be difficulty for a supplier taking on a customer, as they will not be aware until they receive the D149 (if the NHH flows are retained for these meters) or the D268 (if the half hourly flows are used)
GTC	Yes	-
ScottishPower	No	<p>We do not agree with the proposed criteria for separating the new measurement classes. Our main concern is with the use of the Non Domestic CT Metered description, which the assessment consultation proposes as the new measurement class (H) for HH aggregated metered I&C. We believe that not all I&C sites are currently CT Metered, therefore the introduction of this measurement class will create a barrier for the customer that is not there at present.</p> <p>Furthermore Requirement 1 within the consultation paper indicates that the three new measurement classes are effectively for Domestic, Small Medium Enterprises (SME) and Industrial & Commercial (I&C), which in turn reflects the current profile classes that are in use, namely Domestic (PC1-2), SME (PC3-4) and I&C (PC5-8). The I&C (PC5-8) customers are currently mandated to have an AMR meter installed by March 2014, and under the BSC must meet the requirements outlined in COP 10. Elexon have previously confirmed that an AMR can be either whole current or CT metered. Therefore by restricting the proposed new measurement class to I&C Non domestic CT metered, this would force customers who are currently whole current metered within I&C (PC5-8) into the new measurement class (G) Non Domestic whole current, should they elect to go HH.</p> <p>Such a move could ultimately impact on those customers DUoS charges dependant on the level of charges set for the proposed new measurement classes. In addition our understanding is that the new measurement classes would help ensure that DUoS charges would remain the same for those NHH customers electing to be settled HH, which is similar to the aims outlined in the DCUSA Change Proposal DCP 103. If this is the case then the new proposed measurement classes descriptions do not meet this requirement and we would suggest that the new measurement classes have the following descriptions:-</p> <p>F – Half Hourly aggregated metered – Domestic G – Half Hourly aggregated metered – SME H – Elective Half Hourly aggregated metered – I&C</p> <p>The descriptions above now refer to each area of the current NHH market place that all parties recognise. The revised measurement class H description will also ensure that all I&C customers are treated exactly the same regardless of whether they have a whole current or CT Metered AMR meter installed.</p>

Respondent	Response	Rationale
Northern Powergrid	Yes	The new Measurement Classes show a clear distinction between the different types of customer groupings.
Siemens Metering, Communications & Services	Yes	-
IMServ Europe Ltd	Yes	Although this does not impact us as a Party Agent we do agree with the proposal.
Electricity North West	Yes	<p>We agree with the analysis undertaken by the working group which supported our view as the Proposer that the differentiator should be Domestic, which is self explanatory, and Non domestic whole current, and non domestic CT metered for the less than 100kW market.</p> <p>The National Terms of Connection requires customers with CT metering to have an agreed Maximum Import/Export Capacity. In the current PC5-8 market they are classed as requiring a Maximum Demand. The only difference between Maximum Demand and Maximum Import/Export Capacity is the impact of the power factor. It therefore is the closest fit to the current definitions since HH meters do not have Maximum Capacity registers (it has to be calculated). This helps to maintain an understanding of how the old PC definitions map to the new measurement definitions.</p> <p>The physical attribute of a site having CT metered capability is known to the Distributor and to the Supplier and their Agent (via the D0215 – provision of site technical details). This is a physical site asset so it is not subject to interpretation or calculation. It makes it simpler. There is either CT metering at the site or not.</p> <p>By also having this extra layer of granularity between those customers in the SME market and those currently on PC5-8 helps facilitate proposed industry changes.</p> <p>DUoS charges reflect market segments with current charges being different for the SME and PC5-8 market segments.</p>
SSE PLC	Yes	-
British Gas	No	<p>We have some concerns around the criteria for measurement class H. We understand this was added to cater for ex PC5-8, but by setting the criteria as CT metered, this is likely to have the effect of changing the DUoS tariffs for some ex PC5-8 customers with whole current metering to be aligned with the PC3-4 tariff instead.</p> <p>We also don't understand why only 3 new measurement classes are included in the proposal. If we want to use the measurement class to distinguish between DUoS tariffs then arguably there should be enough measurement classes to allow differentiation between all current NHH DUoS tariffs i.e. domestic, domestic two-rate, small non-domestic, small non-domestic two rate, LV medium non-domestic, LV Sub Medium non domestic. If we are not planning to use the new measurement class to distinguish between DUoS tariffs, i.e. we will use LLFCs, then wouldn't we</p>

Respondent	Response	Rationale
		only need 1 new measurement class and then allow the LLFC to distinguish the DUoS tariff?
E.ON UK	Yes	-
EDF Energy	No	We feel this change is premature and as such potentially time limited. The introduction of smart metering may create many new desired classifications of consumers, for various purposes. To spend significant amounts of money on a potential change that might have limited long term future is not our preferred way forward.
RWE npower Limited	No	<p>It is not clear from reading the modification and accompanying documents why there is a need to use a different Measurement Class for CT and Whole Current metering. Are we correct in assuming that we will therefore need a process which identified the need for CT metering to be installed based on a criteria other than the site recording excessive EACs?</p> <p>Is the reason that Measurement Class F has been included to future proof for the introduction of Smart Metering? As yet we are still a long way from getting a decision from DECC regarding domestic sites and Half-Hourly metering information being provided due to the privacy concerns that have been raised.</p>

Question 4: Do you agree that use of the new data flows should be optional for HHDA's, or should it be mandatory (to ensure that Distributors receive data for all Metering Systems)?

Summary

Mandatory	Neutral/Other
13	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Neutral/Other	I disagree with the proposal, therefore I disagree that HHDA should have to send new data at all. If data must be sent, it can be done without impacting HHDA's and SVAA. Please refer to response to question 5.
Western Power distribution	Mandatory	The solution, whichever form it takes, should be mandatory for all HHDA's, otherwise DNO billing systems have to be altered to account for both versions, and it could result in duplication of data through the two different data transfer mechanisms due to systems being out of synch, human error, error and repetition around supplier changes, and other settlements related errors.
UK Power Networks plc	Mandatory	It is our view that it should be mandatory for HHDA's to send the new data flows, as from our experience tells us that unless something is mandatory it will not be consistently used and applied.
Haven Power Ltd	Mandatory	We feel that these flows should be mandatory. This will mean Suppliers not intending to use the new

Respondent	Response	Rationale
		flows will be impacted, however we believe that this is likely to be a smaller group than the Suppliers that will utilise them. Making these flows optional could also lead to complications with interoperability and switching for customers using the new measurement classes who find they are with a Supplier or agent unable to deal with them. Whilst we understand processes and procedures will evolve to deal with this, we feel ensuring that the framework is in place for all Suppliers will be less problematic.
GTC	Mandatory	Whilst it is pragmatic to ensure that HHDA's are not overly burdened by the introduction of new data flows for a business they may not operate in, long term, it is made clear in the case for change that this is the direction the market is shifting towards. It is likely therefore that, most, if not all HHDA's will need to be in a position where they can operate with the new Measurement Classes regardless. Consequently we believe that the flows should be mandatory, without them it is impossible for the distributor to levy the appropriate charges. Any corrections which are required by the supplier, in the optional scenario, may take a long time to resolve therefore creating inefficiencies and loss of revenue for both the distributor & the supplier.
ScottishPower	Mandatory	<p>We believe that the use of the new data flows MUST be mandatory for all Suppliers (and their HH Agents) who wish to utilise the new Measurement Classes. Ideally all market participants should be mandated to be ready to use the flows. Our reasoning behind this view is that as smart meters are rolled out then all users should have systems that are enabled to issue and receive all relevant flows including the new data flows. In addition, this will be the only methodology for the preparation of the DUoS D0030 and D0314 Billing data flows, which are obviously absolutely essential for DUoS Billing purposes.</p> <p>The process for the operation of these new data flows should be mandatory. Any Supplier or Agent that is looking to trade this type of site must ensure their systems are capable of sending and processing the new data flows</p>
Northern Powergrid	Mandatory	Northern Powergrid believes that the HHDA should be mandated to send the new data flows if they are responsible for the metering systems.
Siemens Metering, Communications & Services	Mandatory	<p>Our preference is that the new flows should be mandatory, as it would be a simpler solution to ensure that all Agents are sending the same data flows in the same circumstances, and Distributors are receiving the same data.</p> <p>However, we would like to see draft versions of the proposed new flows, as the changes to current HHDA processes and flow sending may constitute a material change, which could require Agents to Re-Qualify.</p>
IMServ Europe Ltd	Neutral/other	We could accommodate either an optional or a mandatory approach as the systems could be configured to accommodate supplier preference.
Electricity North West	Mandatory	The 'optional' part of this question is more related to when they need to be system and process ready. If

Respondent	Response	Rationale
		<p>the suppliers they have a contract with do not want to support these new Measurement Classes it would be inappropriate for the HHDA to undertake system changes when they will not be used and the existing data flows would only be required. This is a more pragmatic solution than spending money for no benefit.</p> <p>Once one of their suppliers wishes to support the use of such Measurement Classes then they would have to facilitate both processes and both sets of data flows.</p> <p>It will be a commercial decision for the HHDA to decide whether they wish to go in advance of their supplier to potentially gain further business from those suppliers wishing to use these new Measurement Classes.</p> <p>The issue raised within the consultation document regarding the inadvertent selection of a Measurement Class being used that is not supported by their HHDA is however a concern. We need to understand whether there is, or needs to be, some form of validation to identify that this has occurred. As a distributor we would be oblivious to the fact (dependent upon the outcome of the need to receive raw meter data) if it were an aggregated Measurement Class.</p> <p>However, this may be partially covered off by the D0209 (MPAS to HHDA) because the Measurement Class is contained in the flow, so the HHDA will have received notification of a Measurement Class it does not cater. This should result in a D0023 (failed instructions) since "invalid Measurement Class", and "invalid LLFC" (which may be different for these Measurement Classes) are reasons for rejection. This however would not be changed by MPAS since it is valid data received from the Supplier and as such would need to be escalated to them.</p> <p>We have yet to identify any relevant code covering this off sufficiently. However MRA clause 28.8 closes with "If the MPAS Provider is unable to resolve the cause of the Rejection, or identifies the cause of the Rejection to be the fault of the Data Aggregator in accordance with Clause 28.8.3, it shall notify the Supplier who appointed the relevant Data Aggregator, of that fact." The actual cause of the rejection was that of the Supplier but it does highlight an escalation route although we would suggest that it may need to be reviewed and a timescale to resolve the issue within the MRA.</p>
SSE PLC	Mandatory	This should be mandatory
British Gas	Mandatory	I would have thought that for this solution to work use of the new flows should mandatory
E.ON UK	Mandatory	I do not agree with optionality. In my view this causes confusion and unnecessary costs and risks. Data integrity is at the heart of the settlement process and the industry should be eliminating all risks associated with data error. I cannot imagine that distributors would entertain a process that introduces risks to their ability to recover allowable revenue.
EDF Energy	Mandatory	Although we do not support this modification we note that flows would need to be mandatory to ensure a

Respondent	Response	Rationale
		single consistent method of operation.
RWE npower Limited	Mandatory	Although we do not support this modification, we do believe that the data flows should be mandatory to protect the integrity of settlements. This would increase the implementation costs of this modification.

Question 5: Do you believe there is an alternative approach to transferring information between participants that the group should consider?

Summary

Yes	No	Neutral/Other
2	12	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	<p>The solution should be one that is independent of settlement. This is a billing issue and not a settlement issue, therefore the solution should not impact the current adequate settlement processes.</p> <p>Our preferred solution would be the addition of one new measurement class for below 100KW sites that should be billed with non site-specific method. HHDC would carry on sending the HH data to LDSO in D0036/D0275 format. LDSO would be responsible for aggregating the data. They would also be responsible for holding the profile class for the MPANS in order to aggregate the data properly.</p> <p>An alternative solution, to be between Suppliers and Distributors with the help of Supplier Agents if necessary would be for Supplier to request from their agents, as an added service, to send a specific aggregated flow to the Suppliers.</p> <p>Using the Data Collection system, specific totalisation MPANS, one per Supplier/GSP/Distributor/Agent Id, could be created to send the aggregated data in the D0036/D0275 flow. All MPANS for Supplier A, in GSP B and Distributor C with new measurement class X would be aggregated in MPAN Z in D0036 or D0275 format according to the already established Distributor's preference.</p> <p>The data for MPAN Z would be sent to the Supplier as well but would not be sent to HHDA. The data for all the contributory MPANS for MPAN Z would be sent to the appointed HHDA for settlement purposes as normal. The Supplier and the Distributor would carry on receiving the D0036/D0275 for the contributory MPANS to allow for Supplier billing and DuoS bill checking.</p> <p>The Distributors could then use the aggregated data to bill the Suppliers.</p> <p>The Suppliers would need to register the MPANS in measurement class X and pay for the extra service</p>

Respondent	Response	Rationale
		from their agent if they have enough commercial imperative to do so.
Western Power distribution	No	The new data flow, or an alteration to the current data flow, seems to us to be the most efficient method.
UK Power Networks plc	No	No
Haven Power Ltd	No	Information transfer via Data flows is accurate, efficient, economical, and is something that all the parties involved are already set up to use. Any alternative approach is likely to mean either a more manual procedure that would possibly carry an increased margin of error or require development of a new system which would carry additional costs. Neither of these options would be beneficial.
GTC	No	-
ScottishPower	Yes	We would advise that clarification is needed regarding the calculations within the replacement D0040/D0298 Flows. The DTC sets out that the D0040 is populated with "Aggregated Line Loss Adjusted" HH Consumption Figures. This is contrary to the fact that D0030, D0314 and D0036 Flows require Metered Volumes (Unadjusted!). If the new D0040 equivalent flow can only aggregate Line Loss Adjusted (LLA) volumes, then the resulting D0030/D0314 Flow will be overstated by the Adjustment values unless this is subsequently removed. We would suggest that the content of the HH Aggregation Flow must be the equivalent of that submitted for the NHH Aggregation Flows as currently delivered for inclusion within the D00030/D0314.
Northern Powergrid	No	None that Northern Powergrid are aware of.
Siemens Metering, Communications & Services	No	-
IMServ Europe Ltd	No	No
Electricity North West	No	We believe that this is the most pragmatic approach, but are prepared to discuss and understand any alternative suggestions.
SSE PLC	No	-
British Gas	No	We have not identified any alternative
E.ON UK	No	No - Working outside the current change and governance represents risk.
EDF Energy	Possibly	Has the workgroup considered the possibility of simply using particular LLFCs as a parameter for aggregate HH reporting to Suppliers/SVAA/DNOs and DUoS billing?
RWE npower Limited	No	See answer to Question 4.

Question 6: Do you agree with the Group's proposal that aggregated consumption data for the new Measurement Classes should be reported in the existing NHH D0030 and D0314 formats (with Half Hourly data

allocated to the Time Pattern Regimes of an appropriate SSC for reporting purposes)?

Summary

Yes	No	Neutral/Other
10	3	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The aggregated consumption data should not be part of the settlement process but kept separated from it; therefore there should be no need for the information to be sent from SVAA.
Western Power distribution	Yes	Altering the current data flow appears to us to be the most efficient method as it reduces the chance of duplication, ie data for the same MPAN and settlement day being sent through both the D0030 and a new data flow. Any controls around accuracy of settlement data are more likely to be easier to manage if it's all going through the same mechanism.
UK Power Networks plc	Yes	We are supportive of minimum industry change to data flows and therefore agree with the Group's proposal that aggregated consumption data should be reported in the existing D0030 and D0314. Our preference would be to use SSC/ TPR combinations that 'fits' UK Power Networks red, amber and green time bands currently used. The Modification Group should bear in mind that the times for these time bands is not consistently applied across all DNOs.
Haven Power Ltd	Yes	As these flows are already used for aggregated data to enable sites to be charged on a collective basis we feel that using these flows for the new Measurement Classes cause the least disruption and require smaller system changes.
GTC	Yes	-
ScottishPower	Yes	We strongly support this part of the proposal. This allows continuation of a proven process for DUoS Billing while at the same time avoiding issues relating to unacceptable and unnecessary levels of site-specific invoicing. In addition it will also minimise the impact on Suppliers in terms of validating invoices. (i.e. aggregated over HH bills)
Northern Powergrid	Yes	Northern Powergrid understands that utilising the existing D0030 and D0314 data flows is the most appropriate way of reporting this aggregated consumption and Distributor billing systems are already developed to process these data flows.
Siemens Metering, Communications & Services	n/a	n/a
IMServ Europe Ltd	N/A	Neutral – as a Party Agent we do not have an opinion on this.

Respondent	Response	Rationale
Electricity North West	Yes	<p>There are three alternatives to receiving this data:</p> <ul style="list-style-type: none"> • By providing a solution that leaves the existing data flow structure unaltered; • Creating new data flows; or • Amending the existing data flow <p>In the first instance there is an impact on the SVAA to hold a mapping table and apply the relevant data (received on the new flow from HHDA) to each of the LLFC/SSC/TPR combinations so that the existing data flow is unaltered.</p> <p>In the second instance the SVAA would need to apply the data to a new data flow. Such a data flow would impact all suppliers, and distributors. The SVAA equally being impacted dependent upon the structure of the new flow and how they map the data across. There would also be an impact on debating the structure of the new flow.</p> <p>The final option would mean significant changes to the existing data flow structure and no doubt considerable debate over how that should be undertaken.</p> <p>The benefit of the first option is that the supplier and distributor community will see no system impact in processing the data. They will have to have a business process in place to initially set up the LLFC/SSC/TPR combinations. In our view we would probably default to the most common SSC/TPR combinations used against each profile class.</p> <p>If the second option is chosen we will see the need for such a mapping table not being required but the SVAA will need system changes (to cater for new data flow to new data flow mapping) as will all suppliers and distributors. As in the option above, this does cater for suppliers coming on board when they wish to do so since they would have no data within this flow (or against the new LLFC/SSC/TPR combinations) until they chose to use it.</p> <p>In the third option, this impacts all distributors, suppliers and the SVAA irrespective of whether the supplier wishes to participate in these Measurement Class areas. This is against the intent of the Modification, and is seen to be the most costly solution of the three.</p> <p>In our opinion, the first option is a more pragmatic, costs effective approach and is in agreement with the working group solution.</p>
SSE PLC	Yes	-
British Gas	Yes	Existing D0030 format would seem to be desirable.
E.ON UK	Yes	This is a pragmatic approach the data should be retained on the Elexon Portal and be available to Suppliers for validation purposes.
EDF Energy	No	If this proposal is progressed, new flows should be used to ensure parties not using the change are not impacted.
RWE npower Limited	No	We do not believe that attempting to use NHH data flows or data items within the HH market is suitable. If a solution is required to manage these sites within HH settlement then a purpose built solution is required, not a fudge from NHH.

Question 7: Does the proposed restriction to local time SSCs with switching times on half hour boundaries cause you any issues?

Summary

Yes	No	Neutral / Other
5	8	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	N/A	N/A to Supplier agents
Western Power distribution	No	In the East and West Midlands we are de-linked anyway so we use the SPR data. In the South West and South Wales the current defaults are not necessarily clock time, we would need to be able to apply different defaults depending on the Measurement Class, and this may require some development work on the billing system.
UK Power Networks plc	No	No
Haven Power Ltd	No	-
GTC	No	This does not cause us an issue
ScottishPower	Yes	<p>The problem area that will impact on ScottishPower is that we have a significant number of customers who currently have heating that is dynamically teleswitched. At present there is no defined method of switching load dynamically when a smart meter has been installed and the proposed new measurement classes are being created to offer an HH alternative with regard to the installation of smart meters. It is our understanding that this problem is currently being looked at within the industry but as yet no solution has been put forward.</p> <p>The issues surrounding dynamic teleswitching is something we feel needs urgent rectification. The possible loss of the BBC signal in 2013 may lead to customers not having any heating or lighting in winter months. Scottish Power would support any industry escalation of this issue.</p>
Northern Powergrid	No	Northern Powergrid understand that as long as SSCs are setup as clock time and not GMT then units will then be allocated and reported within the correct TPRs.
Siemens Metering, Communications & Services	n/a	n/a
IMServ Europe Ltd	No	No
Electricity North West	No	It is our intent to use switching times that are on half hour boundaries. We also believe that we should have the MSiD count retained so we can quantify the volume of MSiDs as we transition across and to aid

Respondent	Response	Rationale
		validation. Effectively the more the data flow can be left unaltered the easier it is for all parties.
SSE PLC	Yes	-
British Gas	Yes	This may cause issues going forward as we currently have customers will dynamically switched meters that may not fit the current HH boundaries.
E.ON UK	No	Again, this is a pragmatic approach
EDF Energy	Yes	This would discriminate against those Suppliers that have a portfolio with a higher proportion than others of switching times not on local time half-hour boundaries. This bias would act against BSC objective (c) to promote competition.
RWE npower Limited	Yes	We don't agree with the use of NHH items within the HH world. If a solution is required to manage these sites within HH settlement then a purpose built solution is required, not a fudge from NHH.

Question 8: Do you envisage using the same LLFCs for NHH and HH customers? If so, does the proposal to report these as separate records on the D0030 create any issues for you?

Summary

Yes	No	Neutral/Other
1	9	6

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	N/A	N/A to Supplier agents
Western Power distribution	No	We would establish different LLFCs for the HH metered NHH customers.
UK Power Networks plc	No	Our HH DUoS system expects to receive one line in the D0030 per Supplier/ LLFC/ PC/ SSC/ TPR combination. Therefore, we cannot use the same LLFCs for NHH and HH customers.
Haven Power Ltd	No	We strongly feel it is important for the Supplier to have the ability to differentiate the DUoS charges from the line loss factors. Whether a Supplier will have the option to use the same LLF will be dependent on how the DUoS charging will be structured and if the charge for NHH and the new measurement classes will be the same and will remain that way.
GTC	N/A	We are not certain at this stage whether we will be using the same LLFC's or not as this change proposal will not facilitate our ability to apply a DUoS charge whether we use the LLFC's we currently offer or create new ones.
ScottishPower	No	Our initial thoughts lead us to believe that our preference is to introduce new LLFCs and possibly SSCs (excluding the issue identified in Q7). Either way, we do not see a problem with having separate records on the D0030, as they will not be directly comparable (for aggregation) with existing

Respondent	Response	Rationale
		<p>combinations. Separate LLFCs from the start allows and prepares in advance for future consideration of new tariffs more cost specific to the new Measurement Classes.</p> <p>Having the capability to install new LLFCs would ensure we can support the development of dynamic pricing tariffs that will come as a result of Smart metering. While these tariff types have not yet been defined we must ensure, where possible, we prepare the Industry processes to support their development in the future.</p>
Northern Powergrid	No	There could be a risk that customers could be registered incorrectly if the same LLFCs were used within both markets as well as impacting on our internal reporting processes if LLFCs are the same.
Siemens Metering, Communications & Services	n/a	n/a
IMServ Europe Ltd	N/A	Not applicable to us as a Party Agent
Electricity North West	No	<p>Subject to availability of LLFCs we intend to create new ones thereby being able to see the transition from NHH tariffs to HH aggregated tariffs.</p> <p>We have undertaken a review of our SSCs and it seems that we will need to set up new SSCs and TPRs as the ones we currently use have the GMT indicator to 'Y'. An alternative approach may be to consider setting them to unique default values and amend the system to cater for single and two rate tariffs to align with the current tariff arrangements based on the new LLFCs and the SSC default. The latter would be subject to time and impact.</p> <p>It is interesting to note that for those distributors who have an issue with the lack of LLFCs this Modification will not further exacerbate the problem by reporting separately those sites on NHH consumption to that on HH even though the same combination of LLFC/SSC/PC will be used.</p>
SSE PLC	No	-
British Gas	N/A	N/A
E.ON UK	Neutral	Not strictly a question for suppliers but my thoughts are these: the use of a LLFC for both HH and NHH customers is current practice for some DNOs but these are in different parts of the market. As long as we could distinguish between the two groups from the data supplied it would not represent a concern. It would be preferable to have discrete LLFCs but if this hastened us toward confronting the issue of limited LLFCs then it is to be avoided.
EDF Energy	No	If this proposal is progressed, new flows should be used to ensure parties not using the change are not impacted.
RWE npower Limited	No	We don't agree with this proposal as we do not believe that the D0030 should be used in HH. However, if this proposal was accepted, there would be a need for additional LLFCs at a cost to the industry.

Question 9: Do you believe that LDSOs need to receive data for HH customers under the new Measurement Classes? If yes does there need to be a central method to enable LDSOs to identify aggregated customers to avoid double charging, or do you believe LDSOs would be able to achieve this themselves?

Summary

Yes	No	Neutral/Other
9	2	4

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	LDSO could be able to achieve this themselves.
Western Power distribution	Yes	On the assumption that by LDSO in this question you mean embedded network operator, I believe that the solution needs to comply with the current mechanism for inter-DNO billing. The method must be agreed centrally otherwise the host LDSO will have to cope with multiple ways of the data being received.
UK Power Networks plc	Yes	Currently, as a LDSO, we receive metering data for NHH customers and we would want to continue to receive this data, in the future, even in the event of a Change of Measurement Class.
Haven Power Ltd	No	For a physical MPAN the DNOs should receive either the site specific data or the aggregation – not both. If there is not a central method available to LDSOs to identify aggregated customers we feel the likelihood Suppliers will be inadvertently double charged is extremely high. The resource a supplier would need to check through for double billing is significant, and we believe this would be contrary to BSC applicable Objective a, as it would lead to inefficiencies and inaccuracies.
GTC	Yes	I believe this can be achieved by LDSOs without the need for a central method.
ScottishPower	No	We assume this relates to data over and above the Aggregated Values within the D0030/D0314 Flows. The reasoning behind this response is the same issue of existing systems being unable to cope with the huge increase of flow volumes. If as envisaged we introduce new LLFCs/SSCs, then we will be able to identify the total charged for the new MC's but we will not be able to breakdown the totals on the D0030 Flows to individual MPANs (we cannot do this presently). The risk of double charging should only arise if the records are inaccurate and HH flows are not identifiable at time of receipt (see comments in relation to Q10 & Q11)
Northern Powergrid	Yes	Northern Powergrid would still want to receive the data for those HH customers still on site specific billing, however where customers data is contained within the D0030 then we would prefer to receive this data via another format.

Respondent	Response	Rationale
Siemens Metering, Communications & Services	n/a	n/a
IMServ Europe Ltd	Neutral	Neutral
Electricity North West	Yes	<p>We believe that we should receive some form of raw metered data both to aid validation against those used in the aggregated billing system, revenue protection and for use on the network planning irrespective of whether this is to avoid double charging or not.</p> <p>It is our view that distributors should have validation to prevent double charging rather than rely on Supplier agents to facilitate this. We receive the Measurement Class from the MPRS system so align with the supplier view. We will use such information to ensure that such a site is not billed. Such an approach is accepted practice in the NHH world where we receive D0010s but bill in an aggregated format rather than on receipt of the D0010 data flow.</p> <p>With regard to network management we need data for those customers that have CT meters installed so that we can manage the capacity of each site in line with the National Terms of Connection and to aid Network planning.</p>
SSE PLC	Yes	-
British Gas	Yes	For regulatory losses reporting the DNO may need to receive the data for HH customers to ensure units are not double counted or excluded from their losses calculation. DNOs should be able to modify their billing systems to prevent double charging.
E.ON UK	Yes	A central method offers benefits and mitigates the risk. It is clear from suppliers' experience of the way DNOs dealt with the introduction of the CDCM that they have different billings systems: their interpretation of the CDCM has resulted in – sometimes subtly, other times not – something that is not, well, common. Suppliers cannot hope to drive down their process and systems costs in this area if there is a likelihood of continued error in the costs they face.
EDF Energy	Neutral	<p>LDSOs might have a desire for individual HH customer data for various reasons such as operational, network modelling, or validation purposes. That is something for them to decide. It seems slightly odd that DNOs could have fundamental difficulty with volumes for site-specific billing yet might require, and could be able to handle, the volume of individual measurements for other purposes. If DNOs receive individual data, it would seem a small step to aggregating it themselves. Again, this is an issue for which more significant changes are likely within the next decade under smart metering.</p> <p>We would expect the billing function within LDSO systems to distinguish aggregated data to be used for billing from the individual data used for other</p>

Respondent	Response	Rationale
		purposes. However, the existence of duplicated data in reports ostensibly for DUoS billing would require robust processes within LDSOs. We require more information on how LDSOs would guarantee no double charging to be able to answer this question definitively.
RWE npower Limited	Neutral	This is a question mainly asked to LDSOs so we do not have a comment as a Supplier. However, should it be agreed LDSO to only receive HH data for certain Measurement Classes then this would require system changes for HH Data Aggregators.

Question 10: If the HHDC does provide data, what format should it be in: D0010, D0036/D0275, D0036/D0275 equivalent with new flow numbers, or D0036/D0275 with Measurement Class added?

Summary

D0036/D0275	D0010, D0036 D0275	D0275	Neutral/Other
8	2	1	4

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	D0036/D0275	D0036/D0275
Western Power distribution	D0036/D0275	Bearing in mind that DNOs should still be able to receive the D0010 and this change proposal shouldn't affect other industry processes, we would prefer a modified D0036/D0275 rather than two sets of flows as we feel the controls and data validation would be easier to manage. If the group decision is to not add Measurement Class to all D0036/D0275 flows then we would prefer D0036/D0275 equivalent with new flow numbers so that our billing system is not having to distinguish between identical flow numbers that adhere to different formats.
UK Power Networks plc	D0036/D0275	D0036/ D0275 equivalent with a new data flow number
Haven Power Ltd	N/A	N/A
GTC	D0036/D0275	D0036/D0275 with measurement class added
ScottishPower	D0036/D0275	From a Distribution perspective our preference would be for either D0010 or a D0036/D0275 equivalent with new flow numbers. The former could mean no requirement for flows at all while the latter would at least allow ready identification of flows that are not required for DUoS Billing purposes and therefore re-routing away from billing systems and into whatever new repository is designed to receive and hold them. Such a new repository would have to be developed and may result in significant costs. (Subject to

Respondent	Response	Rationale
		<p>comments in paragraph 3 below)</p> <p>In addition, Distribution Companies are required to issue compliance statements relating to Income and Losses Reporting under very strict criteria within the Ofgem Regulatory Instruction Guidelines (RIGS). These demand use of D0036 raw data for HH reporting purposes (page 64, point 4.108) and use of D0030 flow data for NHHSCP (page 65, point 4.109). We cannot therefore allow both components to exist for the same customer type (i.e. MC's F, G & H) or else double counting would occur.</p> <p>We are also aware of DNO ENA Working Groups looking at SMART Metering overall. Our understanding is that a completely new Communication Infrastructure will be put in place and that the ENA Groups are currently defining DNO Requirements. These are likely to be met out of the Data Communications Company (DCC) and this would support our view that there is no need to produce daily flows for Billing purposes when they will not be used for this.</p> <p>From an HHDC perspective if the required information is already available to the DNO via another flow, possibly the D0010, then the continued use of the existing D0036/D0275 flow would mean no changes to our systems and the DNO would be able obtain the relevant information from existing data flows. However to avoid confusion and to ensure clarity within the Industry we would prefer a new flow based on the D0036/D0275, which includes the new Measurement Classes as we believe that this appears to be the most viable option going forward. Though we also recognise that such an amendment to include the Measurement Class within a 'new' D0036/D0275 flow would require system developments for all parties in order to provide the required information to the DNO.</p> <p>From a Supplier perspective our recommendation would be for the D0036 / D0275 with Measurement Class added to be used for the HHDC data transmission. This would ensure we utilise a proven Industry process for the transmission of data while including the additional data required to identify these new HH sites.</p>
Northern Powergrid	D0275	D0275 for customers still on site specific billing and another format for all other customers.
Siemens Metering, Communications & Services	D0010, D0036 D0275	Our preference would be to add the Measurement Class ID to the existing data flows sent by HHDC (D0010, D0036, D0275).
IMServ Europe Ltd	Neutral	Neutral however the first and the last options would be lowest impact.
Electricity North West	D0010, D0036, D0275	<p>Further to the comment made on question 9 we would prefer not to change the format of the existing D0036/D0275 to include Measurement Class within the flow.</p> <p>We would prefer the following:</p> <p>D0010 on a monthly basis for Measurement Class F & G</p>

Respondent	Response	Rationale
		D0036/0275 on a daily basis for Measurement Class H If there is support for a differentiator then we would prefer new flows (identified under option 3) than amending the existing D0036/D0275. We have concerns over the amount of data being processed on a daily basis should HH flows be sent on a daily basis post the roll out of smart meters.
SSE PLC	No	-
British Gas	D0036/D0275	D0036/D0275 would seem to be most cost effective approach.
E.ON UK	D0036/D0275	D0036/D0275 with MC added
EDF Energy	Neutral	New flows should be used to ensure anyone who does not wish to make changes can operate without being affected.
RWE npower Limited	D0036/D0275	The existing D0036 / D0275 would be the least costly way of managing this.

Question 11: Are there other options that the group should consider? i.e. do not send a D36 to DNO for MPANs in new MC?

Summary

Yes	No	Neutral/Other
4	8	3

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	Again this option complicates the modification proposal solution
Western Power distribution	No	-
UK Power Networks plc	Yes	We believe there will be a need for a consequential DCUSA Mod, with regards to Portfolio Billing under CDCM. CDCM differentiates between NHH and HH billing and we believe distributors will require to differentiate by Measurement Class in order to ensure we do not double bill.
Haven Power Ltd	N/A	N/A
GTC	No	Distributors should be able to handle this on their own
ScottishPower	Yes	We do not see an immediate necessity to send individual flows to the DNO for these sites. However, we see opportunities for SVA to utilise them if produced as a validation tool to measure reporting performance i.e. the data within the HHDA submissions should equate to the sum of all the latest D0036 equivalent flow of each MPAN held by the HHDC. We also envisage a potential need to have an enquiry facility that would allow DNO's to request data sets for MPANs/Dates – this would be similar to the P222 D0010 records but would be able to provide actual

Respondent	Response	Rationale
		data across the full 48 half-hourly periods.
Northern Powergrid	No	No
Siemens Metering, Communications & Services	No	No
IMServ Europe Ltd	Neutral	Neutral
Electricity North West	Yes	There should be the opportunity to opt in or out for data to be sent similar to what occurs for NHHDA's in sending Elexon modification P222 data. When you consider the daily data traffic and the impact on system storage capacity post the smart metering roll out there will be significant costs incurred should the industry continue to send and process this data with potential for data warehousing being held by all parties. It makes more sense to have one centralised repository that parties can request data from rather than all parties hold the same data throughout the country. Until this arrives we would prefer to opt out of receiving the HH data for Measurement Class F & G in preference of a D0010 on a monthly basis for each site.
SSE PLC	No	-
British Gas	No	We have not identified any alternative options
E.ON UK	No	Would this not necessitate change in any case? No, I don't think this is a practical solution
EDF Energy	N/A	N/A
RWE npower Limited	Yes	The Modification Working Group should consider leaving all industry processes as they are and leaving the LDSOs to aggregate these sites themselves for their billing purposes. This change would only involve the LDSOs making a change rather than all parties across the industry.

Question 12: What would be the impact on your organisation specific to the implementation of this requirement by 31st March 2013?

Responses

Respondent	Response	Rationale
TMA Data Management Ltd		The impact would be high on both HHDC and HHDA systems as well as procedures. It is difficult to translate it in pound signs as the solution is only an interim solution and additional cost will come later. The more new flows and new measurement classes and optional sending of flows are added, the more impact it has on the systems and procedures and therefore on the cost of implementation.
Western Power distribution		In order to support the implementation a project will need to be set up to manage the changes required. This will cover the development lifecycle of the system changes required, management of the flow changes, enhancement of the computer infrastructure, development of the appropriate charging regimes and

Respondent	Response	Rationale
		changes to the operation of the DUoS Billing section within WPD. From our software providers perspective, they do not believe that the delivery date is achievable.
UK Power Networks plc		For UK Power Networks, we think there would be a very limited impact, upon ourselves, providing our volumes constraints are not exceeded and a new HH data flow is introduced
Haven Power Ltd		We cannot assess the impact until we know which of the discussed options would be implemented. Generally the shorter the implementation date the greater the costs involved to ensure systems are ready and the greater the risk for error which is why we feel a prompt decision on how this will be implemented is necessary. There has been no indication if the new settlement classes would be available and ready for use from a definite date, or if they would be available for use from change of supply, and this would impact on the costs involved.
GTC		Given the difficulty (see attached comments) regarding our ability to apply DUoS charges under this CP, this would have a negative impact on our business. We would be unable to operate competitively in the market place.
ScottishPower		The major impact will be ensuring that all necessary systems throughout the organisation, impacting all parties, have been updated and fully tested to enable a smooth transition prior to introduction to the new requirements. From both a Distribution and Supplier perspective the respective system providers have carried out an initial high level impact assessment which has indicated that the March 2013 implementation date is not achievable
Northern Powergrid		Northern Powergrid understand that as long as the format of the existing D0030 is not amended and that we can still process the data for the new Measurement Classes within the VMR and TOT lines of the D0030 then we should be able to meet the implementation date on March 31, 2013. (Please also see our response to Question 14).
Siemens Metering, Communications & Services		There are no specific requirements for us in relation to implementation on this date
IMServ Europe Ltd		We would need to review development priorities however this change is low impact.
Electricity North West		<p>The impact on the receipt of HH data will depend on the outcome of the final requirements. There may be validation (should the existing flow be unaltered) to ensure that we don't double bill, and an impact on system capacity for holding the data. If there is new data flows this increases the impact. Also such an impact depends on whether it is all sites receiving HH data or restricted in line with our suggestions.</p> <p>It is likely that we should have sufficient time if the timeline of this Modification is maintained. If there are no new flows then yes we should have sufficient time to complete in time.</p> <p>If there are DTC changes they usually take 6 months from approval so at the latest the industry would need</p>

Respondent	Response	Rationale
		notification by the end of September to attain this timescale. We believe we should press ahead with this intent. It may be that an "opt out" of receipt for all HH data flows is considered until each party wishes to "opt in" when they are ready to receive them thereby potentially making the date of April 2013 a reality. Such an arrangement will however impact HHDCs in managing such a situation and being system and business ready.
SSE PLC		Unlikely to be able to meet deadline of 31st March 2013 – see response to question 13.
British Gas		As this use of HH settlement is elective for sub 100kw customers Suppliers should be able to minimise the impact of this change on their systems. We would however suggest a full review of the change of measurement class process as suppliers who choose not to settle a sub 100kw customer HH may wish to switch the customer back to NHH in order to be able to supply that customer.
E.ON UK		The question is a little unclear so I will take it to mean the inclusion of the MC in the D0036/D0275 or the introduction of equivalent flows. E.ON could meet the deadline specified above for all aspects of change embedded within this proposal. Impacts would be realised in our invoice capture and validation system, our settlement system, our routing system, potentially in the DTN gateway configuration, our reporting system and our billing and agents' systems.
EDF Energy		
RWE npower Limited		Given the level of changes this modification proposes, we do not believe it is sensible or practical to aim to implement this modification by March 2013. Also P272 remains in Assessment Phase as a result of concerns from Ofgem around the proposed benefits of implementing it, therefore to make these changes in 12 months time seems presumptuous.

Question 13: Would Proposed Modification P280 impact your organisation (including potential requirement 6) If so, Please provide a detailed breakdown of costs wherever possible, specifying whether these are one-off or on-going costs. Please also explain the assumptions underlying your costs estimates.

Summary

Yes	No	Neutral/Other
13	1	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Impact on HHDC high system impact (one off development and testing) addition of new measurement class, potential addition of new data flows, addition of modification of existing

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Respondent	Response	Rationale
		<p>D0036/D0275 flows for potential requirement 6.</p> <p>Impact on HHDA: high system impact (one off development and testing) addition of LLF and distributors in the aggregation process, addition of new aggregated flows, addition of new consumption component classes.</p> <p>The cost of re-qualification for all agents needs to be taken into consideration as well as the timescales for the change as this modification proposal impacts the core processes of both HHDC and HHDA's agents and would trigger, in its current form, a re-qualification. This is an additional reason why a billing issue should not have a settlement solution.</p>
Western Power distribution	Yes	The main cost will be updating the billing system to process the modified flows. We would expect the cost of this to be approximately £80,000 - £100,000 based on previous similar changes.
UK Power Networks plc	No	No
Haven Power Ltd	N/A	N/A
GTC	Yes	As stated above and on the attached, it would be difficult for us to bill appropriately. However in addition we believe to apply certain changes described in the CP (requirements 3, 4 & 5) to our billing system, will cost approximately £15000 to £20000 (this is a one off cost from our software developer).
ScottishPower	Yes	<p>The proposals outlined relating to DUoS billing of the new MC on aggregated D0030 basis greatly reduces the impact on our organisation. There will be a requirement to set-up new LLFCs/SSCs on MDD and within our Regulatory Registration and Billing Applications.</p> <p>It should be noted that the Industry successfully set up billing of NHH MD records via Supercustomer aggregated flows. Based on this and the above it is envisaged that the majority of these costs can be absorbed within business-as-usual activities.</p> <p>Other than agreeing no equivalent D0036 flow is required, Option 3 of the alternative solution (a new flow number) is in our opinion the only one that would allow DNO's to identify and re-route such flows away from their billing applications. This would help avoid significant system change to receive/validate/reject huge volumes of flows. However, should any mandatory requirement to receive and process huge volumes of HH Reading Flows be agreed, then costs will immediately be significant and I would refer you to our response to Q1.</p> <p>From an HHDC perspective the impact on our business would be as follows:</p> <p>Development costs to amend HHDA to include Distributor ID and LLFC ID within D0040/D0298 (one-off cost).</p> <p>No impact to HHDC if we were to continue with D0036/D0275.</p> <p>Development for HHDC system to issue new or amended flows to DNO (one-off cost).</p>

Respondent	Response	Rationale
		All other associated changes would be updated via MDD flows. Unfortunately it is not possible at this time to estimate the one off costs.
Northern Powergrid	Yes	Only if the D0030 was amended and that we needed to amend our site specific billing system in order to address requirement 6.
Siemens Metering, Communications & Services	Yes	<p>We would need to make software changes to approximately 3 of our applications relating to our HHDC/ DA portfolio. This would require significant development effort and testing of the new software. Associated process changes would also have to be documented and staff trained accordingly.</p> <p>Estimated costs for this work are very high level, as no specific detail is provided on the new data flows/ changes to existing data flows, but they are likely to be in the region of £20k - £35k, as a one off cost (this does not include any costs for Re-Qualification, should that activity be required (see Q4)).</p> <p>Ongoing costs would relate to additional DTN traffic, storage of additional data, and increased staff levels, however it is not possible to estimate these costs at this time.</p>
IMServ Europe Ltd	Yes	This is dependent on the final option chosen however our costs are much less significant than those of the LDSOs and this is low impact.
Electricity North West	Yes	<p>There will be an impact on us. It is classed as a high impact with levels of granularity dependent upon the final requirements (tens/hundreds of £k). Some of the reasoning's have been explained in earlier comments but the main point is that it is our belief that this solution is far cheaper to the industry overall should the Modification not be accepted and we have no option but to bill all sites on a site specific basis.</p> <p>The costs are expected to be one off costs with some business impact on data received failing validation.</p>
SSE PLC	Yes	As the framework for all the required industry changes become clearer within P280 we should be able to provided a more realistic view of system costs and resource commitments required. An initial indication is there will be costs of around £450,000 to cover system changes with a development time of up to 24 months.
British Gas	Yes	<p>The key point of P280 is that use of the additional measurement classes is voluntary and therefore suppliers can mitigate the potential costs if they decide not to use the new measurement classes. However where suppliers choose not to use the new measurement classes they could still be impacted if they want to acquire a customer who has already been migrated to a new measurement class. We would recommend a complete review of the change of measurement class process should this modification be approved. We would need to review our acquisitions process to ensure we are able to process customers who have elected to settle on a HH basis.</p>
E.ON UK	Yes	

Respondent	Response	Rationale
EDF Energy	Yes	We cannot provide a breakdown of costs at this time. As described previously, a full impact assessment would involve considerable time and cost and divert from other significant activities driven by other regulatory changes. It would be wasteful while a full solution is not yet defined.
RWE npower Limited	Yes	We cannot provide specific costs per system within the timescales provided to respond to this modification. However, a range of systems across both our Supply and Supplier Agent functions contain 'Measurement Class' and as a result would have to be amended to deal with the three new values.

Question 14: Do you agree with the Workgroup's proposed implementation approach and the Implementation Date of 31 March 2013?

Summary

Yes	No	Neutral/Other
9	6	

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The rationale behind the 31/03/2013 implementation is that despite the fact that the needs are not clearly defined yet, a modification should be progressed to gain time in the long run. This does not make sense, especially when the changes proposed impact most of the Industry and further changes will be required later, increasing the cost to the Industry of this premature change proposal.
Western Power distribution	Yes	-
UK Power Networks plc	Yes	Any changes would need to reflect the distributors obligations under DCUSA to only change DUoS charges on the 1 April and 1 October each charging year. The proposed Implementation date, of 31 March 2012, will align with the commencement of a new DUoS Charging.
Haven Power Ltd	Yes	Whilst we understand that this implementation date may be the best compromise across all the different stakeholder interests we feel a 2014 date may be more sensible. Given that system changes will be necessary before the DCC goes live it would be beneficial for Suppliers and Agents to be able to incorporate this change in to their existing plans to upgrade their systems. This would help to keep costs down.
GTC	No	It would be difficult for us to comply with the proposed implementation date given the current parameters of the change proposal
ScottishPower	No	We agree with the Workgroup's proposed implementation approach, however we cannot agree with the proposed implementation date. As indicated

Respondent	Response	Rationale
		<p>in Q12, the Distribution system provider has carried out a high level impact assessment which has indicated that the March 2013 date is not achievable. However, we feel unable to propose an alternative date at this time until final requirements have been agreed.</p> <p>From a Supplier perspective we believe the Impact Assessments indicate that a minimum of 24 months will be required post approval date of this modification.</p>
Northern Powergrid	Yes	Northern Powergrid appreciate that March 2013 coincides with the proposed implementation of MIG22, however in order that all parties are ready for this date, there needs to be enough time in order to carry out any necessary internal changes to accommodate P280.
Siemens Metering, Communications & Services	Yes	-
IMServ Europe Ltd	Yes	Yes
Electricity North West	Yes	<p>Our response is caveated by how quickly the final requirement is known. There is significant amount of other initiatives to consider over the next twelve months inclusive of DCP103 and MIG 22. The former will have an impact but it is hoped that MIG22 will be more of a methodology model change rather than impacting on the system.</p> <p>DTC changes usually take 6 months from approval so at the latest the industry would need notification by the end of September to attain this timescale. We believe we should press ahead with this intent.</p> <p>On top of the impact identified in question 12, the impact on us is that there should be no change to the D0030 so aggregated billing should be unaffected apart from setting up the new LLFC/PC/SSC combinations.</p> <p>Whilst we agree with the implementation timetable into the code we need to be clear that the decision will be made much earlier than this so that other industry code changes can take place to deliver the impact that this code will have on them and market participants have sufficient time to deliver their system and business change processes.</p>
SSE PLC	No	-
British Gas	Yes	We still remain to be convinced that HH settlement as we know it today will be the final solution for settlement when all 29m customers are converted to smart meters. At this stage HH settlement seems to be the best option for customers who wish to take advantage of Time of use tariffs. However we are aware that the PSRG is carrying out a number of "blue sky" workshops and we would prefer to see the output from this work before we committed additional spend to support the current HH market.
E.ON UK	Yes	This is a challenging timeframe but one that can be met by E.ON.

Respondent	Response	Rationale
EDF Energy	No	<p>At first sight, the proposal appears a straightforward way of classifying customer sites to support development of new DUoS billing and charging approaches to be used with advanced and smart HH metering. However, on closer analysis the solution is surprisingly complex because of the inherited existing processes, both centrally, and internally within EDF Energy and its agents. Although we support the intent of the proposal, in practice the impacts on existing systems and processes would be significant. We think the issues would be better dealt with as part of an integrated solution for new registration and data processing processes expected to be developed in conjunction with the DCC under Smart Metering.</p> <p>We do not feel this solution is a suitable long term process for settlement in a smart environment, and could be superseded or become redundant in only a few years time.</p> <p>While there is a potential benefit in principle in sub-dividing HH consumers, we are not convinced that the benefits in the short term are significant while numbers of HH consumers remain relatively low. Any benefits are likely to be outweighed by costs of development across industry.</p> <p>The proposal will divert resource from more fundamental changes to settlement and customer classification expected in future in a smart world.</p> <p>The considerable costs across industry do not better meet BSC Objective (d), and the discrimination inherent in the specific solution proposed, as described in response to question 7, does not better meet BSC Objective (c).</p> <p>In the long term, in the context of smart metering being rolled out in significant numbers, significant benefits are expected for consumers as a whole, and for many consumers individually, from use of more time-of-use Energy and DUoS tariffs. These may require consumers to be classified in various ways, but this should be considered in the whole as part of the development of "smart grids" and "smarter markets".</p>
RWE npower Limited	No	See answer to Question 12.

Question 15: Do you have any views regarding the alternative approached discussed by the Group?

Summary

Yes	No	Neutral/Other
5	10	

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We would support the alternative solution of a super MPAN, even if the preferred solution is option 1

Respondent	Response	Rationale
		discussed by the group.
Western Power distribution	No	-
UK Power Networks plc	No	No
Haven Power Ltd	Yes	We do not feel the alternative approach would be the most cost efficient and this approach would place strain on smaller agents.
GTC	No	-
ScottishPower	No	With the exception of our comments in relation to the description of the proposed measurement classes, we believe that the solution proposed by the group provides the most appropriate solution.
Northern Powergrid	No	-
Siemens Metering, Communications & Services	No	-
IMServ Europe Ltd	No	No
Electricity North West	Yes	Our view is that if aggregation is undertaken by the Supplier Agents this would result in a similar solution but replicated many times by each Agent on behalf of their supplier rather than a central agent on behalf of the industry.
SSE PLC	No	-
British Gas	Yes	The alternative approach would seem to involve industry parties incurring more cost than if changes are made by DA's and central systems.
E.ON UK	Yes	Experience of CDCM and settlement of iGTs would support a centrally controlled process falling under the current governance arrangements. I recognise that we are talking about significant change and significant costs but to entertain looser alternatives would result in unquantifiable ongoing costs ultimately paid for by consumers.
EDF Energy	No	-
RWE npower Limited	No	We do not support the considered alternative approach that the aggregation should be done by Supplier Agents. We also believe that the proposed solution will require changes on the systems of individual participants.

Question 16: Are there alternative solutions that the Modification Group has not identified, that they should consider?

Summary

Yes	No	Neutral/Other
5	8	2

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Please refer to response to question 5.
Western Power distribution	No	-
UK Power Networks plc	No	No
Haven Power Ltd	No	-
GTC	No	-
ScottishPower	Yes	Has the modification group considered the option of introducing more than 3 Measurement Classes? Would it be possible to introduce additional dormant Measurement Classes that could be used in the future? If the modification is approved this would ensure a degree of flexibility is introduced with the change and help reduce potential future costs.
Northern Powergrid	No	None that Northern Powergrid are aware of.
Siemens Metering, Communications & Services	-	-
IMServ Europe Ltd	No	No
Electricity North West	Yes	These are contained within earlier responses.
SSE PLC	No	-
British Gas	N/A	N/A
E.ON UK	No	-
EDF Energy	Yes	Our view is that in the long term, under a smart environment, there should be an aspiration to settle all meters on a half-hourly basis, subject to practicality and cost, perhaps ultimately with sub-half-hourly elements. But we cannot determine how to do this effectively until we have significant experience of smart metering and a stable DCC system in place. Once that is in place we will be better able to determine the practicality and cost-effectiveness of settling all smart metered MPANs on a HH basis.
RWE npower Limited	Yes	As per our answer in Question 11, if this aggregation was carried out by the LDSO then this would be a single change carried out by one group of participants, not across the industry as a whole.

Question 17: Do you believe that P280 better facilitates the Applicable BSC Objectives compared with the current Code provisions?

Summary

Yes	No	Neutral/Other
12	3	

Responses

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Respondent	Response	Rationale
TMA Data Management Ltd	No	P280 is overly complicated, implicating all parts of the Industry from Suppliers to SVAA to try to cater for all possibilities of potential outcomes of future consultations and group decisions without clear benefits for the Applicable BSC Objectives.
Western Power distribution	Yes	We believe it better facilitate Applicable BSC Objective (c) by facilitating more effective management of increased volumes of HH data; and better facilitate Applicable BSC Objective (d) by increasing the efficiency of the provisions in the BSC relating to HH data in light of increased volumes of such data.
UK Power Networks plc	Yes	UK Power Networks believes that proposals in P280 will better facilitate the BSC Objective d 'Promoting efficiency in the implementation of the balancing and settlement arrangements'.
Haven Power Ltd	Yes	Given the move towards smart metering for all customer sectors we feel that this change is necessary.
GTC	Yes	-
ScottishPower	Yes	We believe that the proposal P280 better facilitates Objectives (c) and (d) compared with the current Code Provisions. Under Objective (c) we believe that the extended use of HH data will give Suppliers an option as to whether they wish to enter the HH market, thereby making this segment of the market more competitive. Under Objective (d) we believe that increased HH data will increase the accuracy of settlements, thereby promoting more efficiency within the current arrangements.
Northern Powergrid	Yes	This modification promotes efficiency by utilising existing data flows/processes therefore providing a cost effective solution for addressing smart metering data.
Siemens Metering, Communications & Services	Yes	We agree with the workgroup that P280 would better facilitate Applicable BSC Objective (c), by facilitating more effective management of increased volumes of HH data.
IMServ Europe Ltd	Yes	Yes – under objectives c and d
Electricity North West	Yes	We concur with the working group in believing that Objective C and D are better facilitated for the reasoning given by the group.
SSE PLC	Yes	
British Gas	Yes	We support the principle of removing barriers to elective HH settlement as we believe this will better facilitate competition in the supply of electricity. However we are not yet convinced that the workgroup has landed on the best solution to achieve aggregated HH Duos bills as per our response to question 3.
E.ON UK	Yes	We believe that the modification will help suppliers who wish to migrate customers into HH settlement where suitable metering will give benefits to those customer and so we support the contention that it facilitates Objective C. We would however suggest that the benefits do not attract entirely to the supplier community and that the development costs of the SVA systems are not insignificant and would ask that

Respondent	Response	Rationale
		funding of this change is ring-fenced and shared between the supply and DNO communities on the basis that this approach assists the DNOs in defraying their own billing system replacements where they are unable to meet the full requirements of HH billing.
EDF Energy	No	<p>As it cannot be used to settle all SSCs (as per question 7), it is biased and as such cannot truly support competition objective (c).</p> <p>The considerable costs across industry do not better meet BSC Objective (d).</p> <p>The proposed change is not efficient in terms of managing HH data, as it introduces three new unnecessary measurement classes that HH settlement needs to accommodate.</p> <p>There is no clear evidence that the benefits would outweigh the disadvantages described above, even if no other changes were expected in the relatively near future.</p> <p>It appears to be a short term solution. As a long term solution, we feel it is flawed, as it assumes that settlement in a smart environment will work in an identical manner as currently. We think this is unfounded, and significant changes will have occurred by the end of the decade.</p> <p>Based on our review, we cannot see any better facilitation of BSC Objectives overall with this modification.</p> <p>We have added other comments below, and ask that the workgroup consider these too.</p> <p>Other comments</p> <p>1. The proposed Measurement Classes are described as:</p> <p>F. Half Hourly aggregated metered (Domestic) [subset of ex PC1-4, a few ex PC5-8]</p> <p>G. Half Hourly aggregated metered (Non domestic whole current) [subset of ex PC1-4]</p> <p>H. Elective Half Hourly aggregated metered I&C (Non domestic CT metered) [subset of ex PC5-8]</p> <p>It is not obvious that a categorisation by type of consumer is better than categorisation by the behaviour of the consumption taken, for the purpose of cost-reflective DUoS charging. For example, why should a domestic CT metered site with a high load factor be aggregated separately from a similar non-domestic CT metered site?</p> <p>Ultimately, in a long term future, the full benefits of smart metering will only be achieved if local distribution network costs are reflected in individual supplier/consumer time-of-use costs/prices. This would require more significant changes to the</p>

Respondent	Response	Rationale
		<p>classification of consumers for the purpose of DUoS or other charging purposes.</p> <p>2. As a company we support the aspiration for HH settlement to become the norm in a smart metered environment. However, we are not convinced that shoe-horning the current processes is an efficient way to achieve this on a bulk scale. Significant work on possible long term options is required, but other issues must be resolved and stabilised before it will become efficient for this work to be progressed. Priorities should be a significant and successful smart rollout and a stable DCC system managing all registrations and meter read requests for smart meters. Only once we have confidence HH data can be reliably and efficiently collected from DCC, in the volumes we require, should we divert resource to revisions to settlement requirements.</p>
RWE npower Limited	No	<p>We do not believe P280 will improve competition. However, we believe site-specific billing for HH sites would improve competition due to the transparency of costs.</p> <p>There are currently no guarantees that smart metering HH data will be available for use in the domestic market therefore do P280 cannot provide a cost effective solution. In addition, P280 does not make use of existing processes in their entirety and would incur significant costs by all parties across the industry.</p> <p>Although we agree that increased volumes of Half-Hourly data is preferential, restricting site-specific invoices is detrimental to Suppliers and Customers.</p>

P280 New Measurement Classes

Consultation issued on 30 April 2012

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
Western Power Distribution	4 / 0	DNO
Electricity North West	1 / 0	DNO
GTC	1 / 0	DNO
Imserv Europe Ltd	0 / 6	NHHDC / NHHDA / MOp
Northern Powergrid	2 / 0	DNO
ScottishPower	3 / 1	Supplier, Distributor and Party Agent
E.ON	5 / 7	Supplier, HH DC, NHH DC
SSE PLC	6 / 0	Supplier/Generator/ Trader / Party Agent / Distributor
RWE npower	9 / 0	Supplier and Party Agent
UK Power Networks	4 / 0	DNO
EDF Energy	10 / 0	Supplier / Party Agent / Consolidator / Generator / Exemptable Generator / Trader
SmartestEnergy Limited	1 / 0	Supplier/trader/consolidator
British Gas	1 / 0	Supplier

Question 1: Do you agree that the P280 solution should be extended to Export in this way?

Summary

Yes	No	Neutral/Other
11	1	1

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	It would be very advantageous to be able to settle actual half hourly data from small scale export via aggregate billing.
Electricity North West	Yes	As export sites increase it makes sense to consider whether the present method of dealing with these sites and their allocation to one set of CCC's is the approach the industry wants to adopt. This should be considered in light of the benefit seen by the industry in having further CCCs in this area.
GTC	N/A	N/A
Imserv Europe Ltd	Yes	There is an increase in customers within the proposed measurement classes who are generating and consequently more export data is being collected - it is therefore logical that export should be included.
Northern Powergrid	Yes	Northern Powergrid feel that all relevant consumption types should be incorporated especially export as the growth/uptake associated in this area will continue to rise for the foreseeable future. Therefore, incorporating export now would assist in the efficient manageability of the data and costs.
ScottishPower	Yes	It makes sense that any Export metering on a site, should where possible be treated exactly the same as the Import meter on site.
E.ON	Yes	This would be a pragmatic approach, and would allows Suppliers and DNOs to manage any surplus generation accordingly.
SSE PLC	Yes	Gives consistency and clarity
RWE npower	Yes	Our view is that additional Export Consumption Component Classes will provide a clear 'view' of export values associated with the new measurement classes.
UK Power Networks	Yes	Our view is this solution is a pragmatic way of dealing with small generation
EDF Energy	Yes	We have concerns in principle with this proposal. But if it were to be implemented, it would be consistent to extend the solution to Export sites, for which the number might increase considerably in future, and for which there might also be an increase in half-hourly settlement in future.
SmartestEnergy Limited	No	The consultation document is very confusing in this area as it is not clear whether it is referring to new measurement classes for HH or NHH. At the moment all export >30kW must be settled half hourly and DUoS billing is site specific. We would strongly oppose any proposal which allows aggregated billing for any sites which currently receive site specific bills, as it

Respondent	Response	Rationale
		would impact upon our ability to validate the bills. It is also unclear as to why responsibility would rest with the SVAA to calculate the data, rather than the Distributor, and there is also no guidance as to how and when Suppliers should elect to use the new Measurement Classes, and consequently is open to interpretation and possibly gaming. For micro-generation (NHH) we are of the view that some kind of aggregation may be acceptable, but as there are currently only 3000 to 4000 of these sites in the country and it has not increased over the last few years (even with the advent of FiTs) we wonder whether there would be any point in making any special arrangements at this stage.
British Gas	Yes	Ideally the solution should be extended to export where cost effective to do so.

Question 2: Should the three new Measurement Classes share a single set of six Export Consumption Component Classes, or should each one have its own set of six Export Consumption Component Classes?

Summary

Share a single set of six	6 per new MC	Neutral/Other
3	3	7

Responses

Respondent	Response	Rationale
Western Power Distribution	Neutral	WPD does not have a strong view on the number of CCCs for export MPANs.
Electricity North West	Neutral	We can understand the logic being applied from the HH market for Measurement Class C and E to the three new Measurement Classes for aggregated HH thereby supporting a single set of six new CCC's. Equally if the industry sees benefits in increasing this further for each Measurement Class and there are no significant costs then we can support a set of six for each Measurement Class. It does however beg the question as to whether there should then be a further set of six for Measurement Class C and E.
GTC	N/A	N/A
Imserv Europe Ltd	N/A	We are neutral as an agent.
Northern Powergrid	Set of Six	A single set of Export Consumption Component Classes would be in line with the current approach for Measurement Classes C and E. However, Northern Powergrid would like confirmation that all settlement data for these New Measurement Classes will be reported within the VMR group of the D0030.
ScottishPower	6 per new	Given that our preference would be to distinguish

Respondent	Response	Rationale
	MC	Export sites within each Measurement Class we prefer the alternative approach which would introduce a separate set of six new Consumption Component Classes (CCC) for each new Measurement Class. However we also believe that it may be prudent to reduce the CCC for each class down to four as we cannot envisage a scenario where M would be used given that it only applies to EHV sites that have site specific LLFCs.
E.ON	Neutral	<ul style="list-style-type: none"> • This would allow for the industry to manage their arrangements more efficiently. • There will be an impact on the COMC process, going from 5 measurement classes to 6. • If there are three sets of six Consumption Component Classes, i.e. six for each of Domestic, Non-Domestic Whole Current and Non-Domestic CT Metered, it clearly defines a set of customers as Domestic users. If changes will be made to the Distribution Licence Condition to accommodate this, it would make more sense to have three sets so that the DNO can aggregate them separately. If the DLC remains as it is then we would have to stick with one, undefined set of six and the DNO would aggregate all MPANs together, regardless of Measurement Class. • If we opt in, we have to make sure the portfolio is clean. If we don't opt in, how would COMCs be affected? We would have to do cosmetic COMCs (at point of registration?). Significant workload, already a very manual process. • If we don't support P280, enormous cost implications for DNOs. If we do, would there be a need for new DC/DA systems? • How can LLFs be calculated with 3 digits
SSE PLC	Set of Six	Yes subject to it having the same arrangements as import
RWE npower	6 per new MC	Our view is that additional Export Consumption Component Classes will provide a clear 'view' of export values associated with the new measurement classes.
UK Power Networks	N/A	N/A
EDF Energy	6 per new MC	If the approach of new Measurement Classes and Consumption Component Classes were to be introduced, it would be sensible and more future-proofed to have 6 Consumption Component Classes separately for each new Measurement Class, as for Import
SmartestEnergy Limited	Set of Six	This very conundrum is a very clear example demonstrating that what was envisaged as a simple modification is now going to be overly complex or may not deliver all of the functionality that some parties require. Our view is that the three new Measurement Classes sharing a single set of six Export Consumption Classes is the way forward on the grounds of simplicity. We recognise that the Distributors would not be able to identify whether the data was against a domestic house or an Industrial premise in this case, but it is inappropriate to have an even more complicated solution which would create extra work for all Industry participants, of which the cost and

Respondent	Response	Rationale
		benefits case is not fully understood. For example, Suppliers may bear the resulting cost of the SVAA changes.
British Gas	Other	We are still not convinced by the argument that 3 new measurement classes are required. Currently for HH elective we have 1 measurement class and Duos charges are allocated by LLFC. Currently the CDCM includes 2 tariffs for NHH export both of which are single rate therefore we the solution as defined for export appears overly complex.

Question 3: Do you agree that all HHDA's should be required to support the new Measurement Classes?

Summary

Yes	No	Neutral/Other
12		1

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	Allowing this to remain optional would cause erroneous data issues where an HHDA who could not support the new Measurement Classes was appointed and increase the level of complication in the industry.
Electricity North West	Yes	Whilst the initial thoughts where to minimise the impact on Party Agents to only being impacted by their use, the consultation feedback was very supportive of mandating the HHDA to be ready to support at the time of implementation. We are therefore happy to accede to such a request.
GTC	Yes	We agree with the working groups' assessment that there is sufficient complexity that HHDA's should be required to support the new measurement classes.
Imserv Europe Ltd	Yes	For consistency and ease of implementation, we believe these new MCs should be supported by all HHDA's
Northern Powergrid	Yes	This will ensure they have the system functionality already in place should they be appointed to a Metering System with one of the new Measurement Classes
ScottishPower	Yes	Given that the group have already identified that optionality would introduce significant complexity into the market, then it seems sensible to mandate that all HHDA's should support the new Measurement Classes. In addition as the likely use of the new Measurement Classes grows over time as new metering technology is introduced it is very likely that no HHDA will be untouched by the move to utilise HH data going forward. We would also refer to our previous response relating to Aggregation Rules for D0040 (Loss Adjusted) which differ from that of D0030 (not Loss Adjusted).

Respondent	Response	Rationale
E.ON	Yes	In the NHH arena there are more amendments at later settlements (R3-RF). If an MPANs responsibility has moved through a change of NHHDC Agent, then currently the responsibility to correct the settlements moves from one NHHDC to another NHHDC although the NHHDA for each period will remain the same. Each NHHDA would need to be able to aggregate the settlement data for the MPAN no matter which Measurement Class the information is submitted on.
SSE PLC	Yes	Industry benefit. Gives the customer more choice.
RWE npower	Yes	A single approach by all HHDA's would remove complexity in providing data to relevant parties.
UK Power Networks	N/A	N/A
EDF Energy	Yes	Notwithstanding our concerns about this proposal, if it were to be implemented we agree that all HHDA's should have capability to support the new aggregations and dataflows/data structure. This would help avoid exceptions and resource-intensive corrective actions, for example in the case where a supplier specifies one of the new measurement classes for a site which their HHDA is not able to process.
SmartestEnergy Limited	Yes	We cannot support this modification proposal if it is imposing change and costs on suppliers, data aggregators, data collectors, and the supplier volume allocation agent, when the natural solution is simply for more site specific billing from DNOs. Having said that, if this modification is to be approved it makes sense to us that all HHDA's should support the new measurement classes. There should also be some guidance on the scenarios where the new Measurement Classes would be used over Measurement Class E, for example.
British Gas	Yes	Optionality would appear to add unnecessary complexity.

Question 4: What are your views on each option?

Responses

Western Power Distribution

WPD does not intend to use the billing data for network planning purposes. We use the D0010 for HH meters and in the case of smart meters we intend to make ad hoc requests for data for specific MPANs via the DCC. WPD does not wish to receive data that we will not bill on but are obliged to keep. We believe this will make most of our reporting significantly more complex and result in most of our internal reports needing to be re-written to ignore the D0036 data for the new Measurement Classes, as well as re-writing parts of our billing system, in order to receive and store data that we have no intention of using.

The above should have no impact on the current use of the D0010 for HH metered MPANs.

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
--------	------------------	--------------	----------------------------	----------------------

1	"Tick"			
2		"Tick"		
3			"Tick"	
4			"Tick"	
5			"Tick"	
Alternative Option				

Electricity North West

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No			
2	Yes		Option 5	
3	No			
4	No			
5	Yes (see Q6)			
Alternative Option				

We believe that we need to receive some form of raw data for planning and validation purposes. We would prefer to receive the D0010s rather than HH data in line with the pros/cons contained in the consultation. Our second choice would be to receive a new flow but since this is at HH intervals and not used for billing we suspect that this may be challenged certainly on Measurement Class F.

Any utilisation or manipulation of the existing D0036/D0275 flows should be avoided. The validation issues placed on distributors and suppliers would far outweigh the introduction of a new flow or the use of an existing D0010 flow.

The whole issue of receiving HH data for domestic customers is still to be determined. From a distributor perspective we have to prove the case for data at this level.

The government stance is shown below from an extract of the privacy consultation document:

"the Government therefore proposes that network operators should be required to develop more detailed plans to explain what level of data would be accessed, for which purposes, and how privacy concerns would be addressed, and submit these plans for approval. In developing their plans, network operators would be encouraged to consider a full range of options, which might include anonymisation or aggregation of data, use of sampling and other possible approaches".

It is thought that this data would come direct from the DCC by request so perhaps we should be discouraged from seeking such data from existing, new or amended data flows until more information is known especially in the proposed Domestic Measurement Class.

GTC

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1				
2				
3				
4				

5				
Alternative Option				

Imserv Europe Ltd

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1				
2	Yes			
3			Yes	
4				
5				
Alternative Option				

As we are agent, we have simply made our choices on ease of implementation and level of change required. We estimate the changes to be low impact c £20k to implement the most costly option for us. This is the estimated cost to make the changes to our systems to accommodate the new flows only.

Northern Powergrid

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No	Yes	Option 2	
2	Yes	No	Option 5	
3	No	Yes (due to potential risk of generating a site specific bill and aggregated bill for the same customer)	Option 2	
4	No	Yes (due to potential risk of generating a site specific bill and aggregated bill for the same customer)	Option 2	
5	No	No	Option 2	
Alternative Option				

ScottishPower

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	X			
2		X		
3		X		
4		X		
5		X		
Alternative Option				

Given the proposed draft new Electricity Distribution Licence we believe that this is the only viable way forward as it will meet the licence condition restriction with regard to only receiving aggregated data. This also avoids as stated the complexity around huge flow volumes that could not be used on a practical basis for Network Planning or Aggregation Checks. We assume this will be covered within Settlement Validation checks such as GCF returns. We also assume that data sets will be developed through the discussions within the ENA relating to Network Management data requirements.

E.ON

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1			x	
2	x			
3		x		
4		x		
5			x	
Alternative Option				

SSE PLC

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		x		
2		x		
3		x		
4		x		
5	x			
Alternative Option				

See the other options as being unacceptable.

RWE npower

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1	No			
2	No			

3	Yes			
4	No			
5	No			
Alternative Option				

We prefer option 3 as it offers no change to existing flow structure with minimal change to Suppliers validation processes.

UK Power Networks

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		This is worse than the “as is” position.
2	Yes			A D0010 based on a calendar month’s data would probably be acceptable but our preference would be for daily D0010, subject to other regulatory intervention.
3		Yes		Would be billed by our existing system
4		Yes		Would result in system change
5			Yes	Cleaner solution to Half Hourly data
Alternative Option				

EDF Energy

No view given

SmartestEnergy Limited

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		
2			Yes	
3	Yes			
4		Yes		
5		Yes		
Alternative Option				

Clearly we would only be able to support any option which leaves suppliers who do not wish to be a part of this unaffected. However, we are concerned that the clear distinction between half-hourly and non-half-hourly is being eroded in ways which are not fully understood. Furthermore, the pros and cons of the options do not appear to be objective or balanced. For example, Option 3 (Using existing D0036/D0275 data flows for both old and new Measurement Classes), would present the least impact for Suppliers and Agents. However, there is only one 'Pro' listed, against five 'Cons', all of which are made to look as if they would inconvenience the Distributor in some way. When examining the 'Cons' listed in Option 3 more closely, we would raise questions as to whether they are genuine disadvantages; which RIGS reports are being referred to in this section for example, and does it matter (since P280 itself will be referred to Ofgem) that a change to RIGS would require Ofgem approval? It is also unclear why an increase in daily data flow traffic would be deemed as a negative, (or how thoroughly this has been quantified). The last 'Con' states there is no means of identifying whether the data in the flow will be billed by the Distributor on a site specific or aggregated basis. However, surely the old and new Measurement Class in the flows itself would provide this.

British Gas

Option	Preferred Option	Unacceptable	Alternative/ second choice	Additional pros/cons
1		Yes		
2		Yes		
3	Preferred Option			
4			Yes	
5			Yes	
Alternative Option				

As a supplier we would prefer option 3

Question 5: What do you believe are the impacts of the prohibition on obtaining and using consumption data within the Smart Metering - data access & privacy - draft distribution licence condition (see pg 79) published by DECC?

Responses

Respondent	Response	Rationale
Western Power Distribution		WPD believes that this supports the view that D0036/D0275 data should not be sent, as the proposals allow for the data to be used when it is in aggregate form.
Electricity North West		The privacy issue is predominantly surrounding personal data which therefore relates to Domestic consumers. Some extracts from the document referenced in the question are: "One of the key areas coming out from the call for information last year was the need for flexibility in the data access and privacy framework to accommodate

Respondent	Response	Rationale
		<p>future changes in the energy market (for example, on settlement)"; also</p> <p>"Industry participants have already recognised the potential for smart metering to improve the accuracy of the gas and electricity settlement arrangements. The industry is considering the case for moving to greater use of half-hourly meter readings for electricity settlement in future".</p> <p>"Broad support was expressed for industry's work on a move away from profiling to actual half-hourly settlement in future, and it was felt that use of data for settlement purposes should be determined by results of this work".</p> <p>"In light of any decision on a change to more frequent settlement, which would require significant regulatory changes, the position on use of half-hourly data for settlement purposes should be reviewed".</p> <p>The work undertaken by Elexon on PC1-4 customers moving from NHH to HH and the work undertaken here is, in our opinion, a continuation of further work in this area and builds on the feedback from the industry associated with this cost benefit analysis and the work undertaken by DCUSA under DCP103.</p> <p>We recognise the concerns over use of personal data and as such see Settlements resulting in aggregated data for domestic customers derived from the actual HH daily data as an acceptable approach but we must guard on suppliers and distributors receiving the raw data via the back door thereby breaching the Supplier Licence condition identified on page 79 of the referenced document.</p> <p>The approach we have adopted allows for an opportunity to start the process of moving from NHH to HH, by the introduction of the three Measurement Classes being made available to the industry as and when suppliers wish to utilise them (a facilitation modification). Since one of the Measurement Classes is specific to Domestic, we can ensure that such raw data is not passed on, hence the call for the D0010s that would satisfy the Supplier Licence Condition and initially distributor requirements until they provide sufficient evidence to support raw HH data and have aggregated software in place that satisfies any conditions in this area. Whether this is the approach for all the new Measurement Classes is up for debate in this consultation.</p> <p>Albeit we believe it is a sensible approach to receive the D0010s we have been concerned over the significant monthly/quarterly data flows that this would generate on specific days. We believe that the solution may be that when the supplier requests a reading from the meter in order to bill the customer, this information is passed to both the supplier and distributor via a D0010. This could smooth the process over the supplier billing cycles and provide us with a similar data flow timetable as is the case now in the NHH market. This has its drawbacks in that it will still be difficult to validate the aggregated data but does improve the process by receiving actual consumption data on a regular basis for all customers whereas presently we may not receive data for some</p>

Respondent	Response	Rationale
		customers due to access constraints or differing reading cycles (quarterly, six monthly or annually).
GTC		This question appears to be out of scope of P280. We do not believe that this will impact this change.
Imserv Europe Ltd		This does not impact us however we understand from the Licence Condition that the DNO would have to demonstrate that data would not be used in such a way as to enable identification of a Domestic Customer.
Northern Powergrid		<p>Impacts on the prohibition on obtaining and using consumption data within the Smart Metering would be:</p> <ul style="list-style-type: none"> - Lack of accurate information to carry out the billing of DUoS charges; - Continued losses volatility leading to potential increase in disputes; - Inability to efficiently carry out network investment; - Inability to identify whether meters and their communication links are working correctly; - Inability to identify and prevent energy theft
ScottishPower	Yes	Impact will mainly be on Measurement Class F – Domestic. Without approval by the customer it will not be possible to receive D0036/D0275 flows as they are mpan specific. This also supports the view that D0030 and D0314 is the only real option available to DNOs for receiving DUoS Billing data. There must be no risk of partial data being available (e.g., one customer not giving permission for individual MPAN data throws out the whole system and undermines the principles and purpose behind the Proposal
E.ON	Yes	<ul style="list-style-type: none"> • If the customer does not allow us to retrieve HH data, we cannot bill/settle on a HH basis • As per DECC doc, customers will have to opt in (will be done through Ts & Cs). Non-dom opt out. We will need opt out to extend to domestic. • The supplier license conditions means a domestic customer could withdraw their consent for us to obtain consumption data at any time; in this instance would we have a mandatory obligation to Downgrade?
SSE PLC		<p>The opt-In/op-out provisions within the Smart Energy Code, could result in the data access and metering arrangements changing frequently between being settled via half-hourly settlement routes and non-half-hourly settlement routes. Consequently, this may result in an increase in the cost of data management and may cause problems with accuracy and settlement of the whole domestic electricity market, including Group Correction Factors and residual profiles (should the customer never decide to allow half hourly data usage).</p> <p>By prohibiting suppliers from accessing more granular data, future benefits cannot be universally provided, which will impact on the overall objectives of the Government's green agenda and the real value of Smart will not be realised.</p>
RWE npower	N/A	No comment
UK Power	No	N/A

Respondent	Response	Rationale
Networks		
EDF Energy	N/A	N/A
SmartestEnergy Limited		This question in relation to the data access and privacy draft licence condition is confusing because, as previously highlighted, it is not clear whether (or where) this consultation is referring to NHH or HH. The prohibition on obtaining and using consumption data refers to the 'Domestic' customer throughout the relevant section of the data access and privacy consultation document. It is not obvious as to why this paper is referenced in relation to P280, unless there are going to be some limitations on the data which can be used for aggregated billing purposes. This again requires clarification. If this is purely for the use of proposed new Measurement Class 'F', then we would reiterate the point made in Question 3 namely the need for guidance on the proposed use of this code over Measurement Class E, and of meeting the objectives set out in P272.
British Gas		We are disappointed with the current policy decision taken by government since we believe that information pertinent to a specific customer, presented well, can deliver high levels of engagement and highlight opportunities for consumption reduction. We are, however, satisfied that the Government has given this question due consideration, taking account of all stakeholders' requirements, and that it is unlikely to change unless there is clear evidence (e.g. from trials) that this is merited. British Gas will therefore continue with comprehensive trials of Personalised Energy Efficiency Advice during Foundation stage of smart meter roll-out.

Question 6: Where the preferred option allows should participants have the ability to opt in/opt out of receiving data or should it be mandatory that data is sent?

Responses

Western Power Distribution

The ability to opt in could potentially cause delays in receiving data where, for example, a customer switches from a supplier who does not use the data to a supplier that does or vice versa, which would cause issues for suppliers trying to validate bills. This may increase the burden on DNOs with regard to bill queries. That said, if the chosen way forward is to use D0030s and not D0036s/D0275s then this issue is less significant.

Electricity North West

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No	N/A	N/A	
2	Yes	Opt in for MC F&G. Opt out for MC H		

3	No			
4	No			
5	Yes	Opt in for MC H only, Opt out for MC F & G		
Alternative Option				

The opt in/opt out provision is designed to allow flexibility for various requests from industry parties. The level of flexibility needs to be determined. Is it by Measurement class or by data flow?

Our preferred solution would be at Measurement Class level, where we would like to receive D0010s for Measurement Class F & G for all the reasons indicated above.

However, we believe for Measurement Class H customers it is better to receive the HH data flow. Measurement Class H customers are not domestic, therefore in our view, not being impacted by the privacy issue; and similar customers on Measurement Class E have HH data provided.

It also allows the distributor to calculate the capacity value in order to manage the network and ensure that the customer, through the National Terms of Connection, do not exceed the agreed capacity between them and the distributor. The D0010 cannot provide such data since the source data is HH rather than a MD register.

If it is not cost effective to deliver at Measurement Class level then it is questionable whether we should have the ability to opt in/ opt out at data flow level apart from where data has effectively duplicate flows (D0036 or D0275 but perhaps no need to receive both).

If opting in and out is not justifiable we would then prefer to receive the D0010s for all the three Measurement Classes albeit some benefit in the use of the data would be lost (i.e. for capacity calculations), but it does prevent any concerns over privacy and is better than no receipt of data as identified in Option 1 earlier.

GTC

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	X			
2				
3				
4				
5				
Alternative Option				

We believe that option one will avoid any double charging scenarios and we do not require any additional data flows in order to bill. Where any other option is chosen we believe that it should be mandatory, in order that distribution businesses can comply with the RIGs requirements. In our experience where the sending and receiving of data is not mandatory, it can be difficult to resolve any issues with receipt, data quality etc...

Imserv Europe Ltd

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1			Mandatory	
2			Mandatory	
3			Mandatory	
4			Mandatory	
5			Mandatory	
Alternative Option				

Rather than having to cater for who has opted in / out, we believe for ease of implementation that all options should be mandatory

Northern Powergrid

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No	N/A	N/A	
2	Yes	No	Yes	
3	No	Yes	No	
4	No	Yes	No	
5	No	Yes	No	
Alternative Option				

Option 2 ensures parties receive the D0010 and can choose whether this is received monthly/quarterly for validation purposes. This option also mitigates the risk of double billing as well as impact on parties to develop IT systems to avoid generating a site specific bill for new Measurement Classes if either Option 3 or 4 is preferred.

ScottishPower

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	X		X	
2				
3				
4				
5				
Alternative Option				

For the reasons stated earlier, we believe that whatever Options are chosen, they must be Mandatory i.e. Opt-Out should be not considered viable.

E.ON

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1			x	

2			x	
3		x		
4		x		
5			x	
Alternative Option				

- This will be driven by what comes out of the license

SSE PLC

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3				
4				
5	x			
Alternative Option				

There should be a common process for all parties which should be mandatory on our preferred option.

RWE npower

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1	No			
2	No			
3	Yes	No	Yes	
4	No			
5	No			
Alternative Option				

Making it mandatory would be good for the market

UK Power Networks

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3				
4				
5				
Alternative Option				

We would wish to receive the data

EDF Energy

No view given

SmartestEnergy Limited

Should P280 be implemented, then whichever option is settled upon should be mandatory for all parties to avoid inconsistency of processes and possible exceptions. Requirement 6 of the consultation document; 'Amending the HHDC-LDSO data flow', states that it is possible that the Suppliers may want one option, whilst Distributors may favour another. This presents further ambiguity over how a decision will be made. A further option of changing the Distributors' billing systems altogether to remove the burden on Industry participants to change their systems and processes, should also be investigated.

British Gas

Option	Preferred Option	Opt in / Out	Mandatory	Additional pros/cons
1				
2				
3		Yes		
4				
5				
Alternative Option				

Question 7: Do you have any further comments on P280?

If you responded to the initial P280 consultation, please note here any changes to your views from those in your previous response.

Summary

Yes	No	Neutral / Other
	No	

Responses

Respondent	Response	Rationale
Western Power Distribution		N/A
Electricity North West		No
GTC	N/A	N/A
Imserv Europe Ltd	N/A	N/A
Northern Powergrid	No	No
ScottishPower		The views expressed by ScottishPower remain as stated in our earlier responses. In particular, we have concerns regarding the description of each new MC (whole v current metering) and also the definition of

Respondent	Response	Rationale
		<p>the Aggregation rules within D0040 (presently Loss Adjusted but DNO's require unadjusted figures on the resulting D0030/D0314 Flows.</p> <p>If the new measurement class descriptions remain as they are at present both ScottishPower and Manweb Distribution would be required to introduce new LLFCs with regards to Measurement Classes F and H because it is not possible to use the existing LLFCs within PC 5-8 as they cannot identify whether an AMR meter is either whole current or CT Metered. However we understand that there is a (another) separate industry group looking at this issue with regard to the introduction of new DUoS tariffs.</p> <p>In addition, while we recognise that the purpose of the Modification is to give Suppliers a choice of Measurement Class going forward, has the Group considered the cost impact that may be incurred to utilise these new Classes. E.g. Change of Measurement Class, metering, agent costs etc. It may be that such costs provide a barrier to moving to the new classes which could in effect mean that the new Measurement Classes are redundant before they are implemented.</p> <p>A final point, given that there are a number of Industry Groups all working towards a similar solution it may be sensible for those groups to get together to see if a common solution could be developed.</p>
E.ON		<ul style="list-style-type: none"> On the face of it, P280 appears to be more cost effective than P272. If DCC holds all data in centralised location, the data protection/supplier issue becomes irrelevant? Can aggregate at supply point level Our other concerns are around impacts on import export metering - if a customer chooses to use different import/export suppliers, would matching Measurement Classes be used? How would aggregate import/export Mpans? How would it work if, for instance the import & export supplies have different measurement classes (EG NHH on the import but HH on the export)?
SSE PLC	Yes	If this MOD is approved we would want to see that measurement class E is removed.
RWE npower	No	
UK Power Networks	No	-
EDF Energy	Yes	<p>In respect of BSC Objectives, the only benefit of this proposal appears to be a reduction in the volume of data reported to DNOs for the purposes of DUoS billing, compared with current site-specific data. While the reduction in volume might have practical benefits in reducing some communication charges, this direct benefit is probably quite small.</p> <p>All other benefits appear to be in the realm of DUoS charging, either within DNO companies, or in the handling of DUoS bills by Suppliers. The link between these benefits and the BSC objectives is not clear.</p>

Respondent	Response	Rationale
		<p>The cost for EDF Energy to implement this proposal would be considerable. Increases in the number of sites settled half-hourly are expected to remain relatively low for several years. Until a larger infrastructure is in place throughout the industry to handle the increased data volumes in the end-to-end supply process, and consumer products are developed that deliver benefits from half-hourly settlement, the overall benefits could be small. The rollout of smart metering and expected future developments in DCC processing, and probable more fundamental changes to settlement towards the end of the decade, could make this proposal P280 redundant, and expenditure on it could turn out to have been wasted if benefits do not materialise quickly. The cost-benefit return period for this proposal might be too long to justify making expensive changes with limited life.</p>
SmartestEnergy Limited	Yes	<p>We are concerned about interactions with P272 which is a proposed mandatory change to avoid cherry picking, and which does not seek to muddy the current arrangements but to operate under the established HH processes. We believe that the uncertainty around the impact to P272 presents a risk in itself, and that use of Measurement Class E may gradually diminish following implementation of P280. P272 mandates that everything on a Profile Class 5-8 would be settled Half-Hourly. However, by introducing three new codes which are open to interpretation by the supplier, this modification would present a risk to P272's objectives.</p> <p>Finally, P280 is described as a 'facilitation consultation', and optional for suppliers. However, if we were to 'opt out' of using the proposed new Measurement Classes, and subsequently attempted to gain a customer whose previous supplier had elected to use one, then we may experience difficulty in registering that site. With this in mind, our view is that P280 is potentially anti-competitive, and therefore against the BSC Objectives.</p>
British Gas		<p>British Gas supports the principle of elective HH settlement however we recognise the potential for gaming by suppliers which could place costs unfairly on other suppliers.</p> <p>We would recommend that Elexon reviews this in parallel with the proposed changes that have been raised. Suppliers should not be prevented from moving customers across to HH settlement where contracts have been agreed relating to Time of Use tariffs or customers have particular load patterns which would not be allocated in a cost reflective manner under the current profiling regime.</p>