

CPC00658 – Impact Assessment Responses for CP1275 v2.0, CP1281 and CP1282

CP1275 v2.0 - Supplier Agents - Access to Meter Protocols

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
United Utilities	NNH MOA/HH MOA	Yes	--
British Energy	Supplier	Yes	--
NPower Limited	Supplier, Supplier Agents	Yes	180
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	60
IMServ Europe	HHDC	Yes	--
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	30
E.ON UK Energy Services Limited	NHH DC/ DA MOA	Yes	
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
EDF Energy	Supplier, NHH Agent and HH MOP	No	30
Independent Power Networks	LDSO, UMSO, SMRA	Neutral	--
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	--

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
British Energy	Yes	Agree with proposal as it facilitates inter-operability.	--
NPower Limited	Yes	Capacity in which Organisation is impacted – Meter Operators and Data Collectors Impact on Organisation - Process and System Impacts Would implementation in the proposed Release have an adverse impact - No	Yes
ScottishPower	Yes	Comment - As stated in our original response Scottish Power believes such a change is essential for the smooth operation of the Change of Supplier process where advanced metering is used. However it is also essential that the Outstation protocol information and proprietary metering configuration software is provided by the meter	Yes

		manufacturers. Capacity in which Organisation is impacted – Supplier, MOA, NHHDC, HHDC Impact on Organisation - Internal processes would need to be adapted	
IMServ Europe	Yes	Capacity in which Organisation is impacted – HHDC	No
TMA data Management Ltd	Yes	Capacity in which Organisation is impacted – HHDC Impact on Organisation – Process change Adverse Impact - No, Nov 09 implementation date is fine Any other comments - Will ELEXON maintain a contact list of the person(s) to contact in the Meter Manufacturer organisation to ensure that Party Agents can request access to Meter Protocol? It is particularly important in the case of new market entrants that do not have existing contacts.	Yes
E.ON UK Energy Services Limited	Yes	Capacity in which Organisation is impacted - NHH DC MOA Impact on Organisation (e.g. systems/process changes) These changes are sufficient to allow E.ON UK Energy Services to operate within the mandated market both as a MOA & DC.	Yes
Scottish and Southern Energy	Yes	Minimal changes to processes	Yes
EDF Energy	No	Comment: We do not see that it is acceptable to place the onus on all parties to agree these details given that this data can be provided to ELEXON as part of compliance process. A process is required where meter protocols are sent out as part of compliance and does not require all parties to agree separately with a manufacturer which is likely to lead to more work and costs for each party. A proactive approach is the only thing that we think should be considered and not one that could lead to problems if a compliance notification is missed by a party who then are appointed to a meter they are unaware of and cannot operate. Form F601/03 should be amended so that information is passed to ELEXON as part of compliance work and that a new process is introduced into BSCP 601 for ELEXON to notify relevant parties of those protocols. A process for dealing with any issues surrounding confidentiality can then be dealt with by the whole industry and not on a party by party basis which is inefficient. Capacity in which Organisation is impacted – Agents Impact on Organisation - Process	Yes

CP1281 – Revenue Protection: requiring the NHHDC to send EAC/AA data to the Supplier via the DTC

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
EDF Energy	Supplier, NHH Agent and HH MOP	Yes	0
NPower Limited	Supplier, Supplier Agents	Yes	180
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	Yes	0
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	--
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
British Energy	Supplier	No	--
Independent Power Networks	LDSO, UMISO, SMRA	Neutral	--
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	90
E.ON UK Energy Services Limited	NHH DC/ DA MOA	Neutral	--

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
EDF Energy	Yes	This change brings documents in line with current practice and as such requires no system and process changes.	No
TMA data Management Ltd	Yes	Any other comments - As an NHHDC UDMS already sends D0019 to NHHDA and Suppliers following any adjustments to the consumption following a report from Revenue Protection. Clarification and standardisation of processes are always welcome to ensure that all agents work to the same standards.	No
British Energy	No	Principally we agree with this Change Proposal because if any amendments are made to the data entering Settlement then the supplier should have visibility of these changes. However, further clarification is required on how the supplier will identify a D0019 that has been generated as a result of a Revenue Protection visit? And how the new D0019 will correlate with the held D0010 history?	--

Siemens Metering Services	Neutral	<p>Capacity in which Organisation is impacted: NHHDC</p> <p>Impact on Organisation :process changes would be required</p> <p>Implementation : 90</p> <p>Would implementation in the proposed Release have an adverse impact? No adverse impact</p> <p>Other Comments: We have not received any corrections from Revenue Protection Services for some time, but would like to raise the following points based on data that has been provided to us in the past:</p> <ol style="list-style-type: none"> 1. The corrections RP identify usually go back several years and it is not clear how / whether we (as an NHHDC) are supposed to enter data which was stolen in a period that has now crystallized. 2. The corrections took no account of Change of Supplier or change of meter, and it is not clear how to apportion the energy across these periods. <p>Whilst we realize these issues do not relate directly to this CP, it may be worth considering them if this process is being reviewed.</p>	Yes
E.ON UK Energy Services Limited	Neutral	<p>Capacity in which Organisation is impacted: NHHDC</p> <p>Impact on Organisation: There will be no direct impact on our activities as our systems and processes are currently compliant with the proposed change as when a read is entered or amended a new EAC/AA is calculated. All D0019s are sent to the relevant supplier & DA parties</p>	No

CP1282 - Maintenance of Outstation Types as part of Compliance and Protocol Approval

Summary of Responses

Organisation	Capacity in which Organisation operates in	Agreement Yes/No	Days Required to Implement
NPower Limited	Supplier, Supplier Agents	Yes	180
IMServ Europe	HHDC	Yes	30
Association of Meter Operators	Trade Association for Meter Operators	Yes	--
TMA data Management Ltd	HHDC, HHDA, NHHDC, NHHDA	Yes	30
Scottish and Southern Energy	Supplier/Generator/ Trader / Party Agent / Distributor	Yes	0
Stark Software International	HHDC/HHDA	Yes	-
British Energy	Supplier	No	--
EDF Energy	Supplier, NHH Agent and HH MOP	No	30
ScottishPower	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA	No	--
Independent Power Networks	LDSO, UMSO, SMRA	Neutral	--
Siemens Metering Services	Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).	Neutral	-
E.ON UK Energy Services Limited	NHH DC/ DA MOA	Neutral	--

Detailed Impact Assessment Responses

Organisation	Agreement Yes/No	Comments	Impact Yes/No
NPower Limited	Yes	<p>Comment - When will we receive the associated DTC CP New Process for Managing Changes to Outstation Type Valid Set?</p> <p>Capacity in which Organisation is impacted – HHMOA and NHHDC</p> <p>Impact on Organisation (e.g. systems/process changes) – System Impacts and New Processes Required</p> <p>Would implementation in the proposed Release have an adverse impact - No</p>	Yes
IMServ Europe	Yes	<p>Capacity in which Organisation is impacted – HHDC, MOA</p> <p>Impact on Organisation (e.g. systems/process changes) – Potential Changes to Configuration.</p>	--

Association of Meter Operators	Yes	Comment - A logical approach, which will be more effective than a valid set maintained within the DTC. A corresponding DTC change will be required to delete the current set, and cross refer to ELEXON website.	--
TMA data Management Ltd	Yes	Capacity in which Organisation is impacted – HHDC Impact on Organisation (e.g. systems/process changes) – Processes Adverse Impact - No, Nov 09 implementation date is fine	Yes
Stark Software International	Yes	Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc): HHDC Impact on Organisation (e.g. systems/process changes): Optional enhancement to take advantage of identification of new meter types Comments Optional costs only Would implementation in the proposed Release have an adverse impact? (please state impact): No	--
British Energy	No	British Energy disagree with the content of the change proposal for a number of significant reasons, The purpose of the DTC is to ensure that all market participants are compliant. Rather than removing the 'Outstation Type' (a mandatory field) from the DTC it would make sense (wherever possible) to align the approval process of new metering equipment with the closest future DTC release to ensure that all new Outstation Types are validated as swiftly as possible. The wording of the Proposed Solution is unclear as to the exact solution that is being suggested. If we interpret "The valid set of Outstation Types should be removed from the DTC" as meaning the "official" valid set is held only in the Compliance and Protocol Approval process within BSCP601, it enables any three-character identifier to be included within the D0268. The current "As Is" process of validation within the DTC is there to prevent invalid information entering Supplier and Agent systems: by removing any validation processes, would potentially enable inaccurate information to be distributed, Industry-wide. Likewise, if we interpret "The valid set of Outstation Types should be removed from the DTC" as meaning that there is no validation against ANY Outstation Types, there would also be major impacts on assured cleanliness of data not just for new metering/outstation types but for the existing ones as well. If we are to assume that the Meter Operator sends a D0268 which includes a then-	--

		[DTC] non-compliant Outstation Type, (i.e. for the period between the metering approval and the next DTC release) the Proposal should clearly state the necessary process that is required to take place upon the pending DTC release, i.e.: - Once the next DTC release has passed, the Meter Operator must re-send the D0268 complete with the approved Outstation Type, so that it can be successfully validated by the DTC.	
EDF Energy	No	We would only agree this change if an agreed mechanism of notifying all parties is agreed when new details are agreed. We do not believe current methods are robust enough to deal with this information and place reliance on MOPs to look for changes on a regular basis. This is not acceptable and a direct notification of such changes must be put in place for this data. Capacity in which Organisation is impacted – HH MOP Impact on Organisation (e.g. systems/process changes) – Process Comments - However, without a notification method most of effort will be on-going work to check and update valid set from website.	Yes
ScottishPower	No	Comment - Scottish Power does not believe that it is necessary to remove the Outstation Types from the DTC. At present the DTC holds a number dummy codes, some which are manufacturer specific, that can be used to accommodate any new Outstation Type prior to the implementation in the DTC of any new codes. In addition it is felt due to the infrequent creation of new Outstation Types this change is unnecessary. Further to this, in order to remove the existing Outstation Types from the DTC will also require a formal change request.	Yes
E.ON UK Energy Services Limited	Neutral	Capacity in which Organisation is impacted (e.g. Supplier, HHDC, etc): MOA Impact on Organisation (e.g. systems/process changes): The process for the agreement of outstation type will have little impact on our activities.	--