

## Collated P223 Impact Assessment responses and discussions

12 responses were received from the P223 impact assessment. The responses to the P223 Impact assessment are listed below by question.

Npower	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>
Total Gas & Power	<i>Supplier</i>
BizzEnergy	<i>Supplier</i>
Scottish and Southern	<i>Supplier/Generator/ Trader / Party Agent / Distributor</i>
AccuRead	<i>NHHDC, MOP</i>
Western Power Distribution (WPD)	<i>LDSO, MOA, MAP</i>
Scottish Power	<i>Supplier, NHHDA, NHHDC, HHDC, HHDA, MOA, Generator, Distributor, Trader</i>
EDF	<i>Supplier, NHH Agent and HH MOP</i>
British Energy (BE)	<i>Generator, Supplier, Trader, CVA MOA</i>
EnDCO	<i>Half Hourly Supplier</i>
Centrica	<i>Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd</i>
E.ON UK energy services	<i>NHHDC, NHHDA, MOA</i>

Question 1	Would Proposed Modification P223, as outlined in the attached Requirements Specification, impact your organisation?	Comments based on discussions
Npower	Yes	n/a
Total Gas & Power	This would have a minimal impact volume wise as a Supplier due to our portfolio size. As we are an I &	-

	C supplier only the majority of our customer base is SME where we experience high churn and short term contracts.	
BizzEnergy	Yes	-
Scottish and Southern	Yes	-
AccuRead	The proposed modification P223 would impact AccuRead both as an NHHDC and a Mop	-
WPD	Yes	-
Scottish Power	Yes	-
EDF	<p>Yes and we would note that we do not think that either of these new approaches would have any benefit over current process. There is nothing in this work that suggests that this loss of customers is adding any bias to profiling. We also note that there is a suggestion that data is being compromised by the fact that any current boosting is not random and representative of consumption. However, we need to point out that any sample that is based on being representative of consumption cannot be truly random, it is at best stratified and potentially clustered, and as such this statement is misleading. We also do not see that an obligation on suppliers to be forced to participate in recruiting customers is the way forward particularly with regard to terms and conditions that PrA offer now and are likely to do so in the future. In fact out of the nine difficulties mentioned we feel that five of these are unchanged by modification P223 and two can be resolved without need for Supplier involvement now. We note that following statement has been made seemingly to justify this modification:</p> <p>"The Panel believes that deterioration in profile data will lead to the NHH data used in Settlements becoming less reflective of actual consumption patterns".</p> <p>Until this statement can be proved we do not think it is right for Suppliers to make costly changes and perhaps other alternatives, i.e. use of smart meters should be considered.</p>	Discussed with EDF the reasons why P223 was raised, but EDF still believe that there are no problems with the current profiles.
BE	Yes	-
EnDCO	EnDCo take a neutral stance on this as we are a HH only supplier and thus this does not affect our systems or processes.	-
Centrica	Yes	-

<p>E.ON UK energy services</p>	<p>The impact would be limited to potential additional usage of an existing facility available to suppliers/customers</p>	<p>E.ON currently put HH meters if customers request such meters, for e.g. energy consultants for energy audits.</p> <p>Customers are also able to access their HH data if they wish to do so.</p>
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Question 2	<p>If impacted by the Proposed Modification, please provide (in a reasonable level of detail) a description of:</p> <ul style="list-style-type: none"> <li>• The impact, and any resulting changes required to your systems and/or processes;</li> <li>• The costs of the above, broken down if possible between the different areas of impact;<sup>1</sup> and</li> <li>• The timescales which your organisation would require to implement the Proposed Modification (from the point at which the final redlined changes to the BSC and all impacted Category 1 Code Subsidiary Documents<sup>2</sup> are available up to the point at which Suppliers receive the first P223 Profiling Sample customer recruitment request), broken down if possible between the different areas of impact.</li> </ul> <p>Please note that the impacts and costs requested are those that are additional to costs for supporting the current Profile Administration process.</p>	Comments based on discussions
Npower	<p>Numerous changes specific to our systems and processes would have to be made to enable us to register, track and trace MPAN's that were selected for the sample. By way of example, and at a high level, these include the following:</p> <ul style="list-style-type: none"> <li>• Site selection – a means of identifying MPAN's in the sample</li> <li>• Standing data</li> </ul> <p>➤ provision would have to be made to enable the appointment of non</p>	Provided some additional confidential information which has been removed.

<sup>1</sup> If you wish this cost information to remain confidential, please clearly indicate this in your response. Confidential information will not be provided to the Modification Group or the Panel, but will be made available to the Authority.

<sup>2</sup> For example, Balancing and Settlement Code Procedures (BSCPs).

	<p>standard agents</p> <ul style="list-style-type: none"> <li>➤ a marker would be required to ensure that identified profile sample MPAN's are not included in any (bulk) change of agent activity</li> <li>➤ a marker should also ensure the avoidance of the appointment of the PrA's agents to a site not in the profile sample.</li> </ul> <ul style="list-style-type: none"> <li>• Ad hoc reporting – this will serve a number of purposes including: <ul style="list-style-type: none"> <li>➤ identifying those sites where a meter is still to be installed</li> <li>➤ identifying sites where there has been a CoT</li> </ul> </li> <li>• Functionality to enable fulfilment/communication can be sent out to the customer to arrange meter exchange etc.</li> </ul> <p>Resource will be required to assist with identifying and confirming randomly selected MPAN's for the sample and for dealing with queries regarding the installation of metering equipment.</p> <p>It is estimated that the costs of implementing the required functionality across all npower systems is £350,000.</p> <p>Npower would require 12 months for implementation from the point of Modification approval/provision of redlined changes to the BSC to the point at which we receive the first P223 Profile Sample customer recruitment request.</p> <p>If the first data request was made in December 2009 npower would require the redlined changes by December 2008.</p> <p>Implementation could be affected if npower has issues with the generic contract drafted by the PrA. Without having had sight of the contract it is not possible to confirm how long it will take for us to agree and sign the contract. We would hope to be able to complete and sign the contract within 12 months.</p>	
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	<p>We have established that our current customer contract terms and conditions do allow us to replace a meter without the customers consent but if the modification is approved we would have to give further thought to how we would communicate the need to replace the meter with the customer – how we do this would differ for residential and business customers.</p>	
Total Gas & Power	<p>Internal process would have to be implemented to monitor and manage the sample for profiling to report to 'Profile Administrator Service'. A system change would be required to flag associated meters so mandatory updates and rebate confirmation could be carried out .</p> <p>Costs - <b>£600 (one day to implement)</b></p> <p>Timescales</p>	-
BizzEnergy	<p>BizzEnergy does not support the current Profile Administration process due to its relatively small number of customers.</p> <p>The impact of this proposal would be fairly minimal given the small number of sample customers that might be allocated and there is an option for accommodating some of the requirements by manual processes, rather than automated processes, which might be required for suppliers with larger portfolios of customers.</p> <p>The impact of the proposal is assessed as follows :-</p> <p>Customer Recruitment</p> <p>The cost of recruitment is assessed as £100 per customer. This figure factors in the cost of recruitment failures.</p> <p>Change of Supplier</p>	<p>ELEXON mentioned to BizzE that there would be no sample list of PrA MPANs under the current proposed and alternate solutions.</p> <p>ELEXON explained that there is no requirement to track the customers on a CoS.</p>

	<p>For a small number of sample customers it would be relatively efficient to monitor the billing system manually for a sample customer loss, say monthly at an estimated annual cost of £500. The development of an automated reporting query against the database would be at an estimated cost of about £5000. However an automated system would not be required for some time.</p> <p>For sample customer gains, their identification would require :-</p> <ul style="list-style-type: none"> <li>○ Either the running of an automated query against the billing database and a listing of the national sample at an estimated cost of £5000. If a sample customer were to be gained then the ongoing provision of the hh data would be dependent on the previous DC. If it came with a PrA agent or a DC with whom BizzEnergy had a contract then the continued provision of hh data to the PrA would be relatively seamless. If the customer came with a DC with whom BizzEnergy did not have a contract, then one would be required (this might not always be possible) and arrangements for the transfer of the data to the PrA would need setting up.</li> <li>○ Or notification of a sample customer gain coming from another supplier or the PrA. The same issues arise for the provision of the hh data to the PrA.</li> </ul> <p>Change of Tenancy</p> <p>An annual manual check, on the basis of the billing system, for Change of Tenancy could be administered at an estimated cost of £100.</p> <p>Provision of hh Data to PrA</p>	
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	Where BizzEnergy utilises its own agents for the provision of the smart meter hh data to the PrA, an annual estimated cost of £20 per MSID would be incurred.	
Scottish and Southern	<p>A high level cost of around £40K for setting up and thereafter £30K per annum for us as a Supplier. This would involve setting up, an internal new process, resourcing, training to enable the co-ordination and management of these mpans and relevant parties. And would also include contractual obligations/management with the Meter Operators and customers. Changes and amendments to systems and reporting to existing procedures in identifying these customers.</p> <p>The cost of the impact to us as MO would be in the region of £30k per annum depending on the location of the sites.</p> <p>We would prefer a 9 month implementation timescales from the Authority's approval.</p>	-
AccuRead	<p>Its is very difficult to quantify any changes that will be required to AccuReads systems as both NHHDC and Mop we act as party agent as such the impact on us depends on the extent to which we are requested to carry out these services for suppliers.</p> <p>The changes we would probably have to make are around storing details of the HH capable metering and comms details. Setting up processes to retrieve the HH data and processes for the production of the required files to send HH data to the PrA. Additionally we may require new comms equipment to communicate with the meters to retrieve the HH data.</p> <p>The implementation off all the changes would require 9 months for the final approval of final redlined changes.</p>	-
WPD	<p>NHHMOA process will change if required to fit new "hybrid" metering. This will impact on areas such as staff training, internal documentation, and possibly systems if we have to hold details of HH comms and registers on the NHH meter database.</p> <p>If there is a requirement for a new "hybrid" meter then presumably new products would need to be approved for use as we are not aware of any approved meters which</p>	<p>ELEXON discussed these concerns with WPD.</p> <ul style="list-style-type: none"> <li>With respect to the 'hybrid' metering, ELEXON explained that most CoP 5 meters should</li> </ul>



	<p>currently meet this specification. Who will evaluate if a meter meets the requirements, MOA or BSCCo?</p> <p>Changes to dataflows may be needed to advise the data collector of the comms details as these can not be sent on the D0150.</p> <p>It is difficult to assess the additional levels of cost until we know what systems changes are needed. Best guess at the moment is around £10K - £20K to implement.</p> <p>We would need a minimum of 6 months notice to implement after receiving detailed spec. for the required changes.</p>	<p>meet the requirements. ELEXON agreed to create a list of suggested meters, as means for guidance.</p> <ul style="list-style-type: none"> <li>• WPD mentioned that the D150 cannot be used to advise the DC of the comms details. The comms address field is nulled out (J0385). Although it is possible to use this field again, it would require changes to participant systems which is expensive, in relation to the small number of customers it will be used for. Other methods for providing these details were explained, such as Email or phone.</li> <li>• WPD also discussed and noted that RTS customers would be excluded from the PrA sample, due to current incompatibilities between smart meters and RTS technology</li> </ul>
Scottish Power	<p>The impact on Scottish Powers systems and process will depend largely on what solution is agreed for the appointment of agents. However the difficulty and additional cost will arise in contacting and obtaining the customers consent to take part in the survey. Resources will be required to contact the customer, persuade them to take part and arrange the installation of the new metering equipment. It may be that incentives would have to be offered to achieve the mandated level of customer participation. A business case would be required to allocate at least 0.5 FTE to this process. The timescales required would be approximately 6 months.</p>	<p>SP is concerned with not informing the customers, prefer to be open and tell customers to keep them satisfied. With this in mind, propose that there will be costs to provide incentives to get customers to sign up to the PrA sample.</p> <p>Will need to employ staff to manage</p>

		customers and the recruitment process. ELEXON explained that this is not a P223 requirement.
EDF	We will require significant changes to systems and new processes to support this obligation. We do not have enough detail of requirements to provide any detail of costs but we would not be in a position to implement any such major changes in the next two years.	EDF note that there is no common method on how customers should be 'randomly' selected by Suppliers and that there was the potential for Suppliers to do this in different ways and bias the sample.
BE	<p>Based on the summary of P223 solution requirements, we expect the following impact;</p> <ul style="list-style-type: none"> <li>- a process will be required to fulfil the annual obligation to randomly select a proportion of customers to participate in the Profiling Sample</li> <li>- replacing existing Settlement meters for profiling purposes will incur costs resulting from the early retirement of existing assets</li> <li>- there will be an increase of admin costs and the additional responsibility of taking on an asset with regards to a Change of Supplier</li> <li>- to fulfil the obligation to confirm whether there has been a change of tenant for any customers within the profiling sample, costs will be incurred for changes to systems and processes</li> </ul> <p>As we do not yet know the solution we are unable to comment about expected costs. We anticipate that, due to the impact on our systems and processes, this would take 12-18 months to implement.</p>	ELEXON waiting for expected costs from BE, but at this stage BE believe that this will be in line with other smaller Suppliers.
EnDCO	-	-
Centrica	Significant system changes would need to be made to both the BGAS and ENRD systems in order for us to be able to identify and track MPANs involved in the sample and a flag would need to be developed on our systems to identify the sites and remove them from any CoA activity. We estimate the costs involved to be in the region	ELEXON has considered responses regarding the arrangements of a Supplier choosing the 2 available agent options.

	<p>of <i>[confidential cost removed]</i> for ENRD and <i>[confidential cost removed]</i> for BGAS and would require at least nine months development time.</p> <p>Centrica operate two MSIDs with separate systems and processes and differing commercial contracts and agreements.</p> <p>The BGAS MPID has contracts in place with <i>[confidential info removed]</i> commercial organisations for MRA services and a further three organisations for MOA/MOP services. These contracts are awarded with regional exclusivity. These existing contractual arrangements would need to be reviewed at an estimated cost of <i>[confidential cost removed]</i> for legal services with a timescale of around 12 months.</p> <p>Centrica are not be prepared to force a replacement of a customers meter without consent for the purposes of Profile Administration and so we would need to develop a new process for dealing with customers that have been selected but will not consent a meter exchange. The maintenance of the sample would require us to assign an analyst to this process that can produce regular reports and monitor the sample. We estimate the cost of this to be around <i>[confidential cost removed]</i>.</p> <p>Implementation of this proposal may require the development of customer contact scripting and a set of letters and related information. We may need some of these communications to be approved by the Plain English Campaign as the ENRD MPID has a clear English crystal mark. We may also need to have these letters translated into Welsh and available in Braille, the total cost of this would we would estimate to be in the region of <i>[confidential cost removed]</i> and would take in excess of 12 months to develop.</p> <p>We would need to develop an internal training and communication programme for our customer facing staff who may receive enquiries from customers who have been selected or who may have questions about their metering arrangements, as these would differ from the rest of our business. We would need to consider whether this would take the form of a 'hunt-group' number alone for calls to be directed to a specialist team or if in addition we would need to create a new 0845 number for customers to contact. We would estimate the costs involved in this work to be in the order of <i>[confidential cost removed]</i> and would take approximately 12 months to</p>	<p>ELEXON has suggested that Suppliers can choose between the two agent options for all MSIDs at an MPID level. i.e. a Supplier has MPID A and B, so for MPID A the Supplier can choose to enlist the PrA nominated agent services for all MSIDs, whereas for MPID B, choose to enlist the services of its own agents.</p>
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	<p>develop.</p> <p>Furthermore a process would need to be developed whereby we would be able track customer movements across supplier IDs, this would entail developing new interfaces with other supply business and bilateral agreements around transfer of data service level agreements would also need to be developed.</p> <p>Centrica estimate our total implementation costs to be around <i>[confidential cost removed]</i> with a minimum 12 months lead time, followed by an annual cost of approx <i>[confidential cost removed]</i> to cover continued customer communication / query management and monitoring and maintaining the sample.</p>	
E.ON UK energy services	No system changes would be required. There is a potential for minor procedural changes to be required. Standard implementation timescales would be sufficient.	E.ON would require 3 months for document and 6 months for software changes as both a MOP and DC.

Question 3	<p>As indicated in the accompanying Requirements Specification, P223 offers Suppliers the option of either:</p> <ul style="list-style-type: none"> <li>• Using the <u>PrA's nominated agents</u> to obtain and install a HH-capable meter, and to obtain both normal NHH data for Settlement and additional HH data for profiling; or</li> <li>• Using the <u>Supplier's own agents</u> to obtain and install a HH-capable meter, and to obtain both normal NHH data for Settlement and additional HH data for profiling.</li> </ul> <p><b>Suppliers are requested to indicate which of these options they would utilise if P223 was implemented and their rationale for doing so (e.g. whether their decision is due to commercial, financial or practicality considerations).</b></p>	Comments based on discussions
Npower	<p>If P223 was implemented it is likely that initially npower would utilise the services of the PrA's nominated agents to carry out the requirements for Settlement/profiling.</p> <p>For the numbers involved it seems practical that we should appoint an agent that is dedicated to providing the specific service.</p> <p>If the provision is made for Supplier's to appoint their own agents then we may chose to use this at a future date.</p>	Provided confidential information which has been removed.
Total Gas & Power	<b>Who are the nominated agents?</b>	TGP have stated that they will use the PrA's nominated Agents.
BizzEnergy	<p>If a criterion for selection is randomness then customers selected may already have smart meters, in which case the existing meter and agents will be retained and the hh data provided to the PrA by BizzEnergy.</p> <p>If the customer selected is without smart metering then either BizzEnergy's agents or the PrA's nominated agents could be used. However some modifications to BizzEnergy software to support the PrA's agents would be necessary and this option might not be cost effective for a small number of sample customers. Therefore at this stage the</p>	-

	option of using the PrA's agents will not be utilised.	
Scottish and Southern	We would prefer to use the 'Supplier's own agents' option, with all commercial, financial and practicality considerations.	SSE have stated that choosing their own agents will be in line with SSE's corporate strategy
AccuRead	-	
WPD	-	
Scottish Power	<p>Scottish Power Ltd would prefer to appoint the PrA's nominated Meter Operator, but retain our present NHHDC and NHHDA. We would then look to appoint the PrA's nominated agent as the NHH Data Retriever.</p> <p>It is unclear how this set-up will be funded. At present the PrA is not funded directly by the Supplier. By appointing a Suppliers own agents the costs are largely transferred away from the PrA. Is it the intention of this Modification to allow Suppliers to charge Elexon for their agents costs or will the PrA budget be reduced accordingly? If a Supplier appoints the PrA's nominated agents will those agents look to charge the Supplier?</p> <p>If when appointing the PrA's nominated Meter Operator this is not charged to the Supplier our preferred option ensures consistency in Meter Ownership with the costs being directly apportioned to the PrA, while the Supplier retains control over the data and there is minimal contracting.</p>	<p>SP does not agree with having to choose between the PrA and its own agents. SP discussed with ELEXON options and suggested the following:</p> <p>Under this, the Supplier would appoint the PrA as the MO, but keep its DC and DA. The DC and DA will carry normal NHH process. The MO will act as a data retriever and obtain meter reads from the meter. In this arrangement the Supplier acts as a contact point if problems arise with the meter. The MO can also set password levels for different users of the meter.</p> <p>On a CoS, the MO is de appointed by normal processes, and will be aware of such occurrences in a significantly shorter timeframe, when compared to the Proposed and Alternate P223 solutions.</p> <p>The MO/PrA could then contact the new supplier and try to get appointed as the MO again. It is believed that this solves the issues of the proposed and alternate P223 solutions.</p>
EDF	It is unlikely that we would have any option other than to use PrA's nominated agent	EDF believe they would have little choice

	as many of our NHH agents do not have facilities to take readings from HH meters and the expense of doing so would make it impractical.	<p>but to use the PrA's agents, since their own NHHDCs would not be able to read HH meters. However, they have concerns over effectively being 'forced' to sign up to the PrA's Terms and Conditions. EDF's legal department have concerns over IMServ's existing T&amp;Cs.</p> <p>ELEXON: We would develop generic T&amp;C, which will be agreed with the industry during the implementation of P223.</p>
BE	We are of the opinion that the PrA's own nominated agents should be appointed.	BE believed that this will standardise installations, since our customer base is small. The PrA will be familiar with the process and prefer that they take care of these arrangements.
EnDCO	-	-
Centrica	<p>For the ENRD MPID we would be likely to appoint the PrAs agents initially; however we may choose to appoint our own agents depending on the cost delta between developing a delivery process for transmitting the HH data to the PrA and the potentially lower cost of us using our own agents as opposed to the PrAs.</p> <p><i>[Confidential info removed]</i></p> <p>For the BGAS MPID we may have contractual issues which would prevent us using the PrAs agent, which may impact significantly on our choice of agents.</p>	-
E.ON UK energy services	N/A	E.ON does not have any such difficulties, as they currently carry out the installation of HH meters.

Question 4	<p><b>Suppliers and MOAs are requested to indicate whether they believe they would have difficulties in installing HH capable metering for sample participants.</b></p> <p><b>Please provide supporting rationale for this view (e.g. details regarding the types of difficulties which might be faced).</b></p>	Comments based on discussions
Npower	<p>We do have concerns that we may encounter problems switching meters particularly for business customers.</p> <p>The Requirements Specification, under Requirement 3, proposes that Suppliers would be able to reject a randomly selected customer where the Supplier is aware of existing access issues providing the Supplier randomly selects a replacement customer.</p> <p>If a Supplier encounters unforeseen issues with installing a meter we would expect the process in such circumstances to also allow us to select a replacement customer and that we would not be expected to get a warrant in order to replace the meter.</p>	n/a
Total Gas & Power	<b>Cannot see any difficulty</b>	-
BizzEnergy	No	-
Scottish and Southern	<p>We do not believe that by transferring the responsibilities to the suppliers that this Modification will resolve the issues. The suppliers will still face most of issues that this Mod is trying to address, namely</p> <ul style="list-style-type: none"> <li>• Unwillingness of customers to participate in the sample and/or sign up to the PrA's Terms and Conditions;</li> <li>• Lack of space at customer premises for new PrA data-collection equipment;</li> <li>• Lack of Global System for Mobile communication (GSM) signal at customer premises;</li> <li>• Unwillingness of customers to power down their premises to allow the PrA's equipment to be fitted;</li> <li>• Access issues to customer premises (leading to stranded assets);</li> <li>• Lack of diversity in regional dispersion of domestic Sample Participants; and</li> </ul>	<p>SSE feel that the mentioned issues will have an effect on reducing the number of sample participants to choose from.</p> <p>Some of the issues would have been lessened but not dealt with by P223. For example, the single metering solution proposed by P223 will reduce the problems of space for secondary metering, but sample customers may object to having the meter fitted in their premises.</p>



	<ul style="list-style-type: none"> <li>Lack of diversity in non-domestic Sample Participants when targeting group customers (e.g. a particular supermarket chain).</li> </ul>	
AccuRead	-	AccuRead believes that there are no issues other than those highlighted in the P223 documentation
WPD	<p>If there is a requirement for a new "hybrid" meter then presumably new products would need to be approved for use as we are not aware of any approved (COP8/COP5) meters which currently meet this specification. Who will evaluate if a meter meets the requirements, MOA or BSCCo? Will the hybrid meters be able to be controlled by external timeswitch for profiles 2 &amp; 4?</p> <p>If a separate HH comms device is used then space may be an issue as separate comms requires a separate power supply.</p>	<p>ELEXON explained that it is the Supplier's responsibility to ensure that the meters meet the minimum specification, in instances where the Supplier uses its own agents. Note that a suggested list of meters is being drafted as a means of guidance for Suppliers.</p> <p>Separate HH comms device may pose an issue as described.</p>
Scottish Power	It will depend on the type of meter that is installed; whether it is a full HH style meter or a AMR meter with regular communication. Their may issues with a lack of space within a property to install the appropriate equipment Or a lack of GSM signal.	-
EDF	<p>Yes – we currently have issues in appointments being kept by customers when they have issues with their NHH meter. Asking them to take time off for someone to fit a meter that has no value to them and requires that their electricity supply is cut off for a period of time is not likely to lead to a customer willing to have said metering fitted. Also we feel that in many cases visits would be aborted as it would be found that there is no room to fit HH meter and this would lead to problems from our perspective as a Supplier with these customers.</p>	EDF currently find that they are unable to fit meters in a significant number of instances due to difficulties making appointments with customers and customers keeping these appointments. They believe that this issue will be even more of a problem under P223, since there's no direct benefit to the customer from the new meter.
BE	We are concerned that a national roll-out of smart meters as being considered by HMG may conflict with these proposals.	BE question the longevity of the P223 solution, in that it believes that the govt. will introduce smart metering for non domestic customers. These HH meters may mean that these customers move to the HH side of the market.

EnDCO	-	-
Centrica	<p>Both ENRD and BGAS have been involved in significant roll out of AMR / Smart metering technology over the last 24 months.</p> <p>We have experienced significant failure rates on first time installations due to three key issues –</p> <ul style="list-style-type: none"> <li>• Lack of comms / GSM signal</li> <li>• Standard European sized meter cabinets do not have enough space to store the AMR device</li> <li>• Customer has been unwilling or unavailable to allow access on the day</li> </ul> <p><i>[Confidential info removed]</i></p> <p>With regards to the third point around access, it is important to note that in the majority of cases this has been for large multi-premise corporate customers where there has been significant planning and investment in the technology by the corporate customer, but we have still experienced issues with the local site manager. We would anticipate that that this process would have far less communication before the day than our commercial proposition and that there are vastly lower benefits to the end user and so we would expect the failure rate to be significantly higher.</p> <p>Centrica would be reluctant to support a process where we are install smart metering for the purposes of profile administration where we have other sites equally qualified to take part in the programme which already have smart metering installed.</p>	
E.ON UK energy services	N/A	-

Question 5	Would Alternative Modification P223, as outlined in the attached Requirements Specification, impact your organisation?	Comments based on discussions
Npower	Yes	n/a
Total Gas & Power	No impact	TGP have stated that the impact will be no different from the Proposed Modification
BizzEnergy	The impact would be minimal for a small number of sample customers, in that there would not be a requirement to monitor losses of sample customers to other suppliers.	-
Scottish and Southern	Yes	-
AccuRead	Yes the alternative modification P223 would impact AccuRead.	-
WPD	Yes	-
Scottish Power	Yes	-
EDF	Yes	-
BE	Yes	-
EnDCO		-
Centrica	Yes	-
E.ON UK energy services	There would be no additional impacts derived from the alternative modification (see question 1).	-

Question 6	<p>If impacted by the Alternative Modification, please provide (in a reasonable level of detail) a description of:</p> <ul style="list-style-type: none"> <li>• The impact, and any resulting changes required to your systems and/or processes;</li> <li>• The costs of the above, broken down if possible between the different areas of impact;<sup>3</sup> and</li> <li>• The timescales which your organisation would require to implement the Alternative Modification (from the point at which the final redlined changes to the BSC and all impacted Category 1 Code Subsidiary Documents<sup>4</sup> are available up to the point at which Suppliers receive the first P223 Profiling Sample customer recruitment request), broken down if possible between the different areas of impact.</li> </ul> <p>Please note that the impacts and costs requested are those that are additional to costs for supporting the current Profile Administration process.</p>	Comments based on discussions
Npower	<p>There appears to be very little difference in the implementation costs for system changes between the Proposed and Alternative modifications.</p> <p>The system changes required for the Alternative are much the same. Markers would still be required to flag the MPAN's in the systems and functionality would still need to be developed to enable us to appoint non-standard agents. We would also still have to communicate the change to the customer and be able to report on the MPAN's in the sample.</p> <p>The systems costs of £350,000 and implementation timescales of 12 months are the same for both the Proposed and the Alternative.</p>	n/a
Total Gas & Power	Cost and impact the same as for original modification.	-

<sup>3</sup> If you wish this cost information to remain confidential, please clearly indicate this in your response. Confidential information will not be provided to the Modification Group or the Panel, but will be made available to the Authority.

<sup>4</sup> For example, BSCPs.

BizzEnergy	This would result in an estimated annual saving of £500 against the original proposal in that monitoring of lost sample customers to other suppliers would not be required.	-
Scottish and Southern	We believe that we would still have all the implication as in our response to Q2 but with the added cost of £30K per annum for replacing meters/MOp charges upon gaining one of these sites on a Change of Supply. Again we are looking at an implementation timescales of the 9- 12 months.	SSE have concerns with the CoS, where the obtained customers meter may not be supported. As a consequence such a meter would need to be replaced by the meter operator. Additionally a customer may also request for a tariff change, which would require a change of meter e.g. pre payment meter.
AccuRead	The impacts and changes would be largely the same as those for the proposed modification, the difference are detailed below in AccuReads response to question 7.	-
WPD	From a MOA perspective the impacts, costs and timescales are the same as for the proposed modification.	--
Scottish Power	If the alternative modification was adopted then there would be little on no impact on the existing system or processes. However as the new supplier a decision would have to be made to use the incumbent HH meter for settlement purposes, or remove the HH meter and re-install an appropriate NHH meter. In either case the Supplier would incur additional costs. If the HH meter remains in situ and the NHH MOA can support it, then the new supplier will expect to pay rental on a meter which is significantly more expensive than a NHH meter, more so if the meter is for a domestic premise. Alternatively as a new supplier there would be a potential charge from the metering agent for removing the HH meter and replacing it with a new NHH meter.	SP explained that MO could charge for adopting the meter, if the meter has a sim card/phone line e.g. if there is line rental. SP also explained that the removal of the comms would require a site visit, which is also another cost. The PrA could have a list of MPANs that are made available to Suppliers.
EDF	We will require significant changes to systems and new processes to support this obligation. We do not have enough detail of requirements to provide any detail of costs but we would not be in a position to implement any such major changes in the next two years	EDF have confidentially clarified the reasons for their requested lead time, and that these are something specific that they believe prevents them from implementing non-essential changes in the next 2 years.
BE	Please see our response to answer 2.	-
EnDCO	-	-

Centrica	<p>As question 2, however the over-all cost would be lower given that we would not need to maintain the sample.</p> <p>However we unclear around how the process for change of meter would be impacted by this change.</p> <p>We estimate that the initial development costs for this proposal are around <i>[confidential cost removed]</i> and the ongoing costs to <i>[confidential cost removed]</i>.</p>	-
E.ON UK energy services	See question 2	-

Question 7	<p>Respondents are requested to identify any difference in impacts (and, if possible, any difference in any associated costs and implementation lead times) between:</p> <ul style="list-style-type: none"> <li><b>The Proposed Modification Change of Supplier process</b>, under which the New Supplier would have an obligation to retain the existing customer in the sample or nominate a replacement customer; or</li> <li><b>The Alternative Modification Change of Supplier process</b>, under which the above requirements would not apply and a customer would be retired from the sample upon a Change of Supplier.</li> </ul>	Comments based on discussions
Npower	<p>The potential benefit of the Alternative Modification is that it may reduce the ongoing operational resource cost of having to maintain the sample size and track MPAN's on Change of Supplier. It is difficult to quantify this at this time as we can not yet predict how much manual work will be required to maintain the sample.</p> <p>We have concerns with the Change of Supplier process outlined in Requirement 12 and believe it is likely to be some time after SSD before the PrA has noticed they are not receiving data from the old Supplier, determined it is a Change of Supplier &amp; found the new Supplier.</p> <p>The Alternative could possibly lead to a reduction in the operational costs of tracking</p>	<p>Npower feel that the Alternate CoS resolves the issue of customer tracking, but in itself creates other issues e.g. costs of losing customers/meters from the Sample.</p> <p>Some concerns on how smooth the CoS process runs in practice.</p>

	and tracing MPAN's on Change of Supplier. If we only lost a minimum number of MPAN's (5-10%) from our sample over a 12 month period the Alternative Modification would be preferable to the Proposed because we wouldn't have to provide resource to maintain the sample on Change of Supply. If the churn in our sample was greater the costs of replacing stranded assets and installing new meters could outweigh the benefit.	
Total Gas & Power	Cannot see any difference in impact	-
BizzEnergy	Not significant	-
Scottish and Southern	We do not believe that there would be any difference in impacts between both processes but with the added cost to additional process/system change to support the Change of Supply.	SSE believes that the Alternate solution will have an additional cost to that of the proposed solution.
AccuRead	<p>The two areas of difference between the proposed and alternative modification are related to the support of metering installed by another agent.</p> <p>Firstly for the proposed modification as both an NHHDC and a Mop AccuRead would need processes to inherit details of the metering and comms for sample sites on change of supply, it does not seem to be clear how this might happen.</p> <p>Secondly for the proposed modification AccuRead will potentially need to be able to communicate with a wide range of HH capable meters set up by other agents, where as for the alternative modification we would only need to be able to with a defined set of meter make/types.</p> <p>Both these points mean the proposed modification would have a bigger impact on AccuRead.</p>	<p>ELEXON discussed that it was the Supplier responsibility to set up the process, in line with their internal processes.</p> <p>Suppliers would need to ensure that the metering solutions implemented where a Supplier uses its own agents, meets the min. requirements as set out in the P223RS.</p> <p>DCs would inherit details from the old Supplier using existing processes.</p>
WPD	If we provide the meters as part of the MAP service then there is an increased risk of stranded assets under the alternate proposal so this would need to be provided for in the MAP contracts.	-
Scottish Power	Under the proposed modification the only change would be to ensure that the meter data has to be passed on to the appropriate agents, whereas under the alternative modification this could result in a change of meter, which will incur a cost, and a potential change of agents.	-
EDF	We feel alternate would be more expensive as it would be likely that we would need to	EDF's preference is for the customer

	carry out recruitment every year. If customer was retained then it is possible that sampling might only be required on an infrequent basis.	to be retained on CoS (as overall this means less additional customers to be recruited). EDF also indicated that EDF don't automatically swap out meters for new customers.
BE	-	No difference between the proposed or alternate solutions.
EnDCO	-	-
Centrica	<p>In Centrica's view the impacts and costs associated with the original proposal are prohibitive and would have serious implications for our existing contractual model with regards to Meter Asset Provision and readings. Furthermore this proposal would place an unacceptable administrative burden on Suppliers.</p> <p>Whilst there is still potential for significant cost implications under the alternative proposal we do not believe that this is without merit. Were further works to be done to this proposal to remove any barriers to using existing smart data, we believe that this proposal would provide a sensible and practical alternative to the original.</p>	--
E.ON UK energy services	There would be no difference between the proposed and alternative change.	-