

P230 Assessment Consultation Responses

Consultation Issued on 21 January 2009

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	RWE Npower	P230_AR_01	10	0
2.	TMA Data Management Ltd	P230_AR_02	0	4
3.	E.ON UK Energy Services Limited	P230_AR_03	0	1
4.	EDF Energy	P230_AR_04	9	0
5.	SAIC Ltd on behalf of ScottishPower	P230_AR_05	6	0
6.	OnStream	P230_AR_06	1	0
7.	Centrica plc	P230_AR_07	9	0
8.	British Energy	P230_AR_08	5	0

Question 1: Do you believe Proposed Modification P230 would better facilitate the achievement of the Applicable BSC Objectives?

Summary

Yes	No	Neutral/Other
8	0	0

Responses

Respondent	Response	Rationale
RWE Npower	Yes	We believe Proposed Modification P230 will better facilitate Applicable BSC Objectives C) and D) and will align the BSC with the new Supply Licence amendment for advanced meters for Non-Domestic premises.
TMA Data Management Ltd	Yes	Objective C: Promoting effective competition in the generation and supply of electricity is better facilitated by P230 by ensuring that a Change of Supplier process can run smoothly by increasing interoperability. Objective D: is better facilitated by the ensuring that the quality of metering installed is consistent within the market offering reassurance that the data used within settlement is measured correctly.
E.ON UK Energy	Yes	We would support the conclusions of the report that the Proposed

Respondent	Response	Rationale
Services Limited		Modification P230 would better facilitate the achievement of the Applicable BSC Objectives?
EDF Energy	Yes	Objective C: by facilitating the use of advanced metering within the BSC arrangements suppliers will be able to meet the Licence Requirements which come into effect on April 6 th 2009.
SAIC Ltd on behalf of ScottishPower	Yes	<p>ScottishPower agree with the Modification Group that P230 meets BSC objectives C & D.</p> <p>With regard to Objective C, ScottishPower agrees that the Modification satisfies the requirements of the objective. The interoperability that will result from these proposals will better facilitate customer transfers between Suppliers, thus promoting effective competition. Furthermore, by better allowing customers to switch between the NHH and HH market segments, the proposals offer wider opportunities for customers to benefit from competition.</p> <p>In regards to Objective D, ScottishPower agrees that the Modification meets this objective. The ability to regularly extract accurate meter data will both improve the profiling of NHH sites and reduce the risk of errors entering the process through use of estimated data.</p>
OnStream	Yes	<p>OnStream believe that the Proposed Modification P230 will better facilitate the achievement of the applicable BSC Objectives, as this will contribute to objective (c) promoting effective competition, due to the interoperability benefits associated with the proposed modification.</p> <p>The assessment of objectives against the applicable BSC objectives section appears suitable.</p>
Centrica plc	Yes	The legal text provides an appropriate solution.
British Energy	Yes	<p>Objective C: We agree that the proposed modification will better facilitate this objective in accordance with the views expressed in the assessment document. Specifically providing the opportunity to move between Half-hourly and Non-half hourly markets.</p> <p>Interoperability will facilitate the consumer switching process.</p> <p>Objective D: Interoperability will facilitate the transfer of information on change of supply, thereby aiding the efficiency of Settlement processes.</p>

Question 2: Do you believe that the legal text developed by the Group delivers the intended solution for P230?

Summary

Yes	No	Neutral/Other
7	0	1

Responses

Respondent	Response	Rationale
RWE Npower	Yes	<p>We have reviewed the legal text sent out with the Assessment Consultation on 21st January 2009 and the amended, reissued legal text sent out on the 29th January 2009.</p> <p>Having considered the issues raised we believe the original legal text potentially could impact Metering Equipment that was not intended to be included within the scope of the P230.</p> <p>We believe that the amended legal text delivers the intended solution for P230 better than the legal text originally sent out with the Assessment Consultation. However, we are concerned that the amended legal text is more detailed and specific than we believed the group originally intended. In addition to this we have concerns that due to the tight timescales of the modification process for P230, legal text might be approved without the industry having sufficient time to fully assess the implications.</p>
TMA Data Management Ltd	Yes	The legal test clearly sets out the obligations in terms of COP compliance
E.ON UK Energy Services Limited	-	Whilst we are prepared to believe that in legal terms that the proposed text delivers the intended solution we do not feel that the meaning is clearly stated in language that easily understood by the general reader.
EDF Energy	Yes	The drafting reflects the obligations captured within the Licence drafting.
SAIC Ltd on behalf of ScottishPower	Yes	<p>ScottishPower agrees that the proposed legal text does appear to deliver the intended solution. The revised text also allows for further development in the sector without needing additional Code modifications. It also reflects the aim of the modification which is to facilitate the use of COP5 and COP10 meters.</p> <p>In terms of the new revised text 'P230 Proposed Legal Text v0.2' ScottishPower, though supportive of the change, believe there may be a case to locate the additional text within the COPs rather than the Code.</p> <p>It would seem the issue in regards to other meters (PPMs is the example used) being specified within the Supplier License lies not in the proposed</p>

Respondent	Response	Rationale
		legal text within v0.1 but in the way that the additional text in the COPs is worded. It may therefore be preferable to include the additional text in the COPs. The text within 'P230 Proposed Legal Text v0.1' seems to be fit the requirement and as such could potentially remain. This way forward may lend itself more to future developments and remove the need to raise a new modification in the future if requirements were to change.
OnStream	Yes	OnStream believe the legal text developed is suitable.
Centrica plc	Yes	The legal text provides an appropriate solution.
British Energy	Yes	-

Question 3: Do you believe that the proposed wording to be included within the relevant Codes of Practise will achieve its desired objectives?

Summary

Yes	No	Neutral/Other
7	0	1

Responses

Respondent	Response	Rationale
RWE Npower	Unsure	If the amended legal text is to be used then we feel the proposed wording may need to be revised.
TMA Data Management Ltd	Yes	The wording is without ambiguity
E.ON UK Energy Services Limited	Yes	-
EDF Energy	Yes	
SAIC Ltd on behalf of ScottishPower	Yes	The wording to be included within the Codes of Practise appears sufficient to achieve the objectives of the Modification.
OnStream	Yes	OnStream agree the wording to be included within the relevant Codes of Practice is suitable.
Centrica plc	Yes	The proposed wording is appropriate.

Respondent	Response	Rationale
British Energy	Yes	-

Question 4: Do you believe there are any quantifiable benefits related to P230?

Summary

Yes	No	Neutral/Other
1	6	1

Responses

Respondent	Response	Rationale
RWE Npower	No	-
TMA Data Management Ltd	-	It is difficult to quantify the benefits now, but we believe they will be quantifiable.
E.ON UK Energy Services Limited	No	Whilst there will be benefits in terms of industry consistency & associated confidence it is very difficult to quantify.
EDF Energy	No	This modification is facilitating supplier's compliance with their licence obligations rather than delivering a fiscal benefit.
SAIC Ltd on behalf of ScottishPower	Yes	To allow the market to function correctly and in an appropriate manner the new generation of meters must be capable of interoperability. Without this Modification, it is conceivable that meters which do not conform to the intended outcome could be installed in premises in the relevant Profile Classes, frustrating customer transfers and the Change of Agent processes.
OnStream	No	Whilst there are benefits of proposal P230 in terms of improved interoperability and certainty the benefits are difficult to quantify. This is on the basis the principal benefit is avoided disruption to the consumer from interoperability issues, and reduced stranding and inconvenience arising from the potential need to replace assets. The volume of this is uncertain and hence the benefit cannot be easily quantified.
Centrica plc	No	Nothing in addition to benefits already identified associated with industry interoperability.
British Energy	No	It is not possible at this time to quantify benefits from P230 other than that the modification supports the proposed license changes.

Question 5: Do you agree with the implementation dates proposed by the Group?

Summary

Yes	No	Neutral/Other
8	0	0

Responses

Respondent	Response	Rationale
RWE Npower	Yes	However we believe it is important that any amendment made to the BSC accurately reflects the intent of P230 and that no amendment is made that subsequently has to be revised.
TMA Data Management Ltd	Yes	The Modification must be effective at the same time as the additional Supplier's Licence obligations.
E.ON UK Energy Services Limited	Yes	-
EDF Energy	Yes	-
SAIC Ltd on behalf of ScottishPower	Yes	The implementation of the Modification should be as close to the introduction of AMR metering in Profile Classes 5-8 as possible. As such, the proposed implementation date meets this requirement.
OnStream	Yes	The implementation dates proposed within the document appear suitable as long as dispensation is granted in the event that CoP 10 meters are not available at the time of implementation.
Centrica plc	Yes	However we are aware that implementation may be delayed whilst the MID issue is resolved.
British Energy	Yes	-

Question 6: Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered?

Summary

Yes	No	Neutral/Other
0	7	0

Responses

Respondent	Response	Rationale
RWE Npower	No	However we feel the amended legal text may need more assessment time than has been allowed under this consultation.
TMA Data Management Ltd	No	This solution minimises the potential for issues when Suppliers start complying with their new Licence obligations.
E.ON UK Energy Services Limited	No	-
EDF Energy	No	-
SAIC Ltd on behalf of ScottishPower	No	No. Though further consideration could be given to the location of the additional text as suggested in Question 2. In summary though, ScottishPower believes the solution identified meets the aims of the modification.
OnStream	-	-
Centrica plc	No	The solution would appear to be the most sensible approach to achieving interoperability.
British Energy	No	-

Question 7: Are there any further comments on P230 that you wish to make?

Responses

Respondent	Response	Rationale
RWE Npower	No	-
TMA Data Management Ltd	No	-

Respondent	Response	Rationale
E.ON UK Energy Services Limited	Yes	The final section of the proposed Legal Text could give rise to confusion as to which version of COP4 is applicable to the metering system. The current wording indicates that the version of COP4 valid on the date of installation would remain applicable to that metering system for the life of the metering system. Rather than the applicable version of COP4 being that which is currently valid.
EDF Energy	Yes	There will need to be a review of Code of Practice 10 once further clarity has been received from DECC in relation to Smart Metering to mitigate wherever possible the need for premature asset replacement.
SAIC Ltd on behalf of ScottishPower	Yes	Though ScottishPower is supportive of this Modification, it remains concerned that Ofgem and the DECC are yet to clarify the position with regard to MID compliance. Though the Modification addresses a pressing issue affecting the GB market, ScottishPower is anxious that appropriate consideration be given, by the BSC Panel and the Authority, to the impact of relevant European legislation in this area, which could otherwise have serious financial implications for the industry.
OnStream	Yes	In addition to dispensation provided at the time of implementation, this may need to be considered with regards to updates of the relevant version of the CoP. The alternative is to provide sufficient notice of a version change to ensure the assets can be procured and furthermore to ensure any stocks of the current version can be diminished or upgraded as required. Failure to recognise the stock of meter issue with version changes will lead to increased costs and potentially purchased assets being made redundant before installation.
Centrica plc	Yes	The issue of customer lead metering has not been identified to date. There are increasing numbers of customers who procure their own metering arrangements. Appropriate mechanisms will need to be implemented to ensure that in these circumstances, customers adhere to suppliers obligations within the licence and the BSC.
British Energy	No	-