



Change Proposal Circular

To	BSC Change Administrators (BCAs)/ Party Agent Change Administrators (PACAs)
No.	CPC00626
Purpose	Response Requested
From	Change Delivery
Date	14 January 2008

Impact Assessment of P218 'Facilitating Microgeneration within the BSC'

Impact Assessment Requirements

Parties and Party Agents are requested to review the attached P218 Requirement Specification and respond to the questions included in the response form attached to this circular. Responses are required by **12.00 midday on Friday 25 January 2008**.

Please let me know as soon as possible if you are unable to meet this deadline, as it may not be possible for the Modification Group to consider late responses. No response to this circular will be taken to mean that your organisation is not impacted by the proposed changes.

The purpose of this Impact Assessment is to determine any costs and impacts of the Proposed and Alternative Modifications for Parties and Party Agents, and to establish any implementation timescales required by Parties and Party Agents for P218. If Parties wish to submit confidential information regarding implementation costs, please clearly indicate this as such.

For more information on this circular, please contact Dina Solanki on 0207 380 4114 or dina.solanki@elexon.co.uk.

Dina Solanki

Change Delivery

PLEASE RETURN RESPONSES by 12.00 midday on Friday 25 January 2008 to:

ELEXON Modifications

4th Floor

350 Euston Road

LONDON

NW1 3AW

Tel: 020 7380 4361

Email: modifications@elexon.co.uk

Organisation:	AccuRead		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	NHHDC, NHHDA, NHHMOA, HHMOA		
Assessor Name	Iain Milne		
Contact Name (if different to Assessor)	N/A	BCA/PACA:	BCA
Contact email:	MilneI@AccuRead.com	Phone no:	0191 202 7738

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	No Direct Impact, possibility of erroneous reports being generated, (D0095s to supplier, D0023 enquiries from MEO) requiring DA resources.

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	No Direct Impact

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	No Direct Impact

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	No Direct Impact

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	No Direct Impact, would avoid possibility of changes to the NHHDA activities

Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	No impact, would require no changes to systems used by AccuRead.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	No preference, no impact
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	No preference, no impact
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	No preference, no impact
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	For consistency of approach as many of the flows involved as possible should be DTC flows
Question 11	Any further comments on P218?
Answer 11	<p>Of the solutions presented in P218 AccuRead as an NHHDC and NHHDA would prefer that proposal 2 is implemented in order that all P218 Settlement is handled separately from other data aggregation, this would prevent any changes impacting on current NHHDA systems.</p> <p>The solutions presented here seem suitable to account for the settlement impact of micro-generation in the short term however a long term solution which would accurately account for the energy generated would be to implement smart metering for all metering points where micro-generation occurs.</p>

Organisation:	British Energy Direct Limited		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Supplier		
Assessor Name	Deborah Bird		
Contact Name (if different to Assessor)	Jonathan Perks	BCA/PACA:	BCA
Contact email:	jonathan.perks@british-energy.com	Phone no:	01452 653371

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	Due to the number of system changes required and the associated DTC changes, this would have a significant impact on our current processes. In order to supply microgeneration customers, major system changes would be required. Costs would be high and the implementation period would be 18 months from the Authority's decision.

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Due to the number of system changes required and the associated DTC changes, this would have a significant impact on our current processes. In order to supply microgeneration customers, major system changes would be required. Costs would be high and the implementation period would be 18 months from the Authority's decision.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	Due to the number of system changes required and the associated DTC changes, this would have a significant impact on our current processes. In order to supply microgeneration customers, major system changes would be required. Costs would be high and the implementation period would be 18 months from the Authority's decision.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	MPANs are currently unique to a particular register/boundary point/site/customer. P218 would fundamentally change the way in which MPANs are used with potential to undermine the integrity of Settlements. To remain consistent with the MRA, we are of the opinion that skeleton portfolio MPANs should not be created by the DSO. The DSO should only create portfolio MPANs when requested to do so by the Supplier as per the existing process.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	To remain consistent with the MRA, portfolio MPANs should not be registered in SMRS unless requested to do so by the Supplier as per the existing process.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	As a Supplier, we are of the opinion that neither of the above are appropriate. If a Supplier moves from P081 to P218 and the MPAN is disconnected, what would then happen if the Supplier moves back to P081? The original MPAN would be disconnected and no longer in use. However, if the MPAN was to remain, what assurances would there be that export would not be recorded on the P081 MPAN and also the P218 portfolio MPAN?
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes

Question 11	Any further comments on P218?
Answer 11	<p>British Energy does not support P218.</p> <p>Treating microgeneration in a similar way to NHH UMS is inappropriate. UMS is a pragmatic way of dealing with historic electrical system arrangements, originating before supply competition existed. It should not be held as an example for future developments where better arrangements are possible at modest cost. Also, UMS is for a specific customer whereas P218 would be for numerous different customers per GSP. Using an estimated aggregate reading for many customers would not promote accurate reading and billing for individual customers. This would not improve Settlements or encourage microgeneration.</p> <p>No case has been made as to why the existing P081 arrangements should not continue. We have not seen any firm evidence of there being a defect with the code. A dual process solution is inefficient and would over-complicate microgeneration causing greater risk to Settlement. The current P081 arrangements to register export MPANs in settlement should be made compulsory and work should be carried out towards accurate compliance of all participants with this process. This would be a more cost effective approach.</p>

Organisation:	CE Electric UK		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	LDSO & UMSO		
Assessor Name	Emma Ward		
Contact Name (if different to Assessor)		BCA/PACA:	
Contact email:	Emma.ward@ce-electricuk.com	Phone no:	0191 387 7153

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes the Modification will have an impact on CE Electric

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	This would have a direct impact on MPAN Generation Procedures, CE currently work on the principle that an MPAN should relate to a specific metering point and should reflect their associated settlement/registration data. Therefore we do not agree that the modification is an acceptable method of measuring Microgeneration. This modification could potentially require us to raise new LLF classes to represent the new MPAN formats. In terms of cost and implementation timescales we do not believe that enough information has been provided to quantify this.

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Solution 1 would have an impact on CE Electric

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	This would have an impact upon several processes, and require system changes which would incur costs. CE believe it would take a little over 6 months to implement this process.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Solution 2 would have an impact on CE Electric
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	This would have an impact upon several processes, and require system changes which would incur costs. CE believe it would take a little over 6 months to implement this process.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	Although CE believes that neither Solution is acceptable, we feel that suppliers should request the MPANs when they are required. This would enable us to monitor the use of the process more effectively and greatly reduces the risk of having MPANs in the MPAS system that are not required.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Suppliers should register the MPANs if and when they decide to use the P218 process.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	If the modification was implemented CE would allow the MPAN to be disconnected. However we would expect the disconnection of the MPAN to coincide with the registration of the Site with the MEO, so that the site continues to be accounted for.
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Although the interface between the MEO and Supplier would have no direct impact on CE, we feel in terms of data accuracy and provision of audit trail the use of DTC flows would be the preferred option.

Question 11	Any further comments on P218?
Answer 11	<p>In terms of cost we are unaware who would be expected to foot the charge for the implementation of the process? We also feel that the modification is complex in nature and raises issues with data accuracy. CE operate on the principle that MPANs should be set up to reflect individual metering points thus enabling parties to analyse or at least be aware of individual site consumption.</p>

Organisation:	Central Networks East plc Central Networks West plc		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	LDSO		
Assessor Name	Nigel Birchley		
Contact Name (if different to Assessor)		BCA/PACA:	BCA
Contact email:	Nigel.birchley@central-networks.co.uk	Phone no:	01332 393423

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>No major costs in implementing solution or long lead in time required. Under the existing arrangements for export an MPAN is required for each individual generation site. This Modification will therefore reduce the workload in some ways.</p> <p>However there are major concerns about the potential impact upon the Distribution records of generation connected to a Distribution Network. Under the present arrangements the customer is obliged to contact the LDSO to enter into a Connection Agreement specifying that generation may be connected to the customer's installation and that that generation may be operated in parallel with the Distribution Network enabling the export of excess energy generated. As part of the process an MPAN is issued to the customer if the customer indicates that he wishes to sell the excess energy to a Supplier.</p> <p>We are already aware that some customers are failing in their obligation under the G83 certification process to notify LDSOs when generation is connected. Under this modification there is even less incentive/obligation for the customer to notify the LDSO.</p> <p>There is a requirement for LDSOs to have comprehensive records of generation connected to its network. Without this information there are both operational and safety issues. Whilst a single site with microgeneration on a section of network may not be significant, a cluster of sites can potentially cause major issues.</p> <p>If this modification is to mirror the arrangements for demand Unmetered Supplies, then there needs to be the addition of a process whereby to comply with the Unmetered Supplies regulations the customer is obliged to enter into a Connection Agreement. Under BSCP520 the LDSO can only give an unmetered supply if such an agreement has been entered into. The customer is obliged by that agreement to provide an inventory of all connections to the network which is used to calculate the EAC.</p>

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
	We suggest that a similar obligation should be placed upon the MEO to provide the LDSO with a full list (inventory) of all generation sites in order that the LDSO can confirm that a Connection Agreement in accordance with the G83 certification process has been followed by the customer. The MEO may only calculate an EAC for a site where the LDSO confirms that an agreement for generation export has been put in place with the customer.
Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes
Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Additional MPANs would be required and would create a greater workload on the LDSO. There would also be additional workload in managing those MPANs. In addition the comments surrounding Connection Agreement given in the response to question 2 would also apply.
Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	Obviously less work because there is no requirement for LDSOs to create any Export MPANs, however the concerns expressed in the response to question 2 are even greater.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	We believe that MPANs should only be requested and created when Suppliers use the P218 process. This is in the interests of good MPAN management.

Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process for the same reason specified in question 7.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	In question 11 we provide rationale for our belief that export should not be traded on an unmetered basis. For this reason we would expect existing Export MPANs to remain in place.
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Recent BSC Audits have highlighted significant errors in settlements following process failures for Unmetered Supplies, in particular the D0052 EAC flow. For this reason we believe all flows should be DTC flows.
Question 11	Any further comments on P218?
Answer 11	<p>We have concerns that the adoption of an “Unmetered Supply Approach” has the potential to create major errors in settlements. Whilst sites are small in number at present any error now will have a major affect as numbers increase.</p> <p>Leaving aside the profiling issues, we believe that the use of Export Factors is fundamentally flawed. The data has been supplied from the BEAMA trial shows that a wide range of annual export figures can result from the same equipment. Individual site circumstances such as the demand for energy at each site cause such variations. These circumstances are not taken into consideration in the proposal. If anything the trial results support the need for metering of export.</p> <p>We understand the desire for a low cost solution but we believe the emphasis should be on a low cost metered solution rather than unmetered. In the unmetered world the emphasis has been on accuracy of consumption and the testing process prescribed in BSCP520 for approval of equipment for connection on an unmetered basis emphasises that consistency of load is required to ensure that accuracy of calculation is achieved.</p> <p>This Modification Proposal uses a broad brush one size fits all approach that would not be acceptable in the unmetered world.</p>

Organisation:	E.ON UK		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Supplier		
Assessor Name	Colette Baldwin		
Contact Name (if different to Assessor)		BCA/PACA:	
Contact email:	Colette.baldwin@eonenergy.com	Phone no:	07793 648490

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	See additional comments

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	See additional comments

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes

Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	See additional comments
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	They should be created as and when required by suppliers.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Suppliers should choose when to register the MPANs if and when they decide to use this process
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Once the scale of customers involved in the process moves beyond a couple of hundred then a more formal mechanism for sending information will be essential, so for future proofing purposes they should be DTC flows.
Question 11	Any further comments on P218?
Answer 11	<p>On first review of the proposal we felt that the solution being proposed had merit, however it has become clearer to us during the development stage that the solution is over-engineered for what is in reality an interim solution. We feel that when the market reaches sufficient volume the drivers will exist to change the commercial arrangements with agents and possibly to amend the industry design too to encourage the wider take-up of microgeneration technologies.</p> <p>As to the specifics of the proposal we are concerned about the calculation of export factors as it means that this solution is only suitable for the smaller capacity generators - larger sized microgenerators would meet the business case for the installation of half hourly metering and the use of the P81 model. Similarly the data on which the export factors have been calculated gives us cause for concern – it has become clear to us during our review of the Carbon Trust Trial data that, in particular, micro CHP sites (which were installed in new housing developments) were not the ideal locations to maximise the benefits of this</p>

Question 11	Any further comments on P218?
	<p>technology and in fact would be more suited to larger homes which in turn would affect the calculation of the export factors. We also believe the proposal would be bad from a customer perspective as the proposed power factor would potentially see even the current modest levels of compensation paid to consumers reduce.</p> <p>In respect of the deemed amount of export, using a UMS type EAC does not solve the fundamental issue that it is not possible to determine when and how much a site is exporting without metering, hence the EAC and load factor proposed will always be a compromise. Additionally it is important to note that a deemed solution would not recognise the results that a customer might achieve in cutting their consumption and thereby potentially increasing their export.</p> <p>We believe the implementation costs in delivering this proposal are significant and we estimate that 300+ development days will be required, which we feel are comparable to those we would have faced under P213, however this proposal fails to deliver a platform for a metered solution in the future. There would be a significant cost of implementation to the industry participants both in terms of the creation of the new agent (to consolidate export metering inventory across suppliers) and also the IS and process changes incurred by the suppliers in setting up to interact with the new agent and manage their portfolio of microgeneration assets, as well as a set of new BAU processes to administer going forward - all of which would be thrown away when the volumes grew and a more appropriate (almost certainly) metering based solution was introduced.</p> <p>In conclusion we feel it is important to note that a fair reward for export is being portrayed as one in which the export is "settled" and that without a meter to measure the export the customer is somehow being disadvantaged, however little mention is made of the greater benefit the customer is realising in the avoided import costs which in particular at times of rising fuel costs will always outweigh those of the export. Suppliers have developed propositions which recognise the value of the export without burdening the customer and their own businesses with unreasonable costs for little reward.</p> <p>In essence we believe the successful solution for the long term must be one which is both cost effective and value reflective.</p>

Organisation:	EDF Energy		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Supplier, NHH Agent and HH MOP		
Assessor Name	Dave Morton		
Contact Name (if different to Assessor)		BCA/PACA:	BCA
Contact email:	External.Change@EDFenergy.com	Phone no:	0190 328 3465

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes, even if we chose not to use P218 solution we would still need to be able to communicate with MEO to accept details of MPANs in P218 process and de-register such MPANs.

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	Given the short time periods available we do not have an accurate estimate of costs. We would, however, require a 12 month notification period to implement these changes to our registration processes.

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes, even if we chose not to use P218 solution we would still need to be able to communicate with MEO to accept details of MPANs in P218 process and de-register such MPANs.

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Given the short time periods available we do not have an accurate estimate of costs. We would, however, require a 12 month notification period to implement these changes to our registration processes.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes, even if we chose not to use P218 solution we would still need to be able to communicate with MEO to accept details of MPANs in P218 process and de-register such MPANs.
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	Given the short time periods available we do not have an accurate estimate of costs. However, we do recognise that this option would have lower costs than main and alternate 1 solutions as no changes would be required for our NHHDA. We would, however, require a 12 month notification period to implement these changes to our registration processes.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	Not unless DSOs can easily identify these as being portfolio MPANs. If this cannot be done it is possible that details of these will be sent out as untraded and this could lead to mistakes being made in updating such MPANs in SMRS.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	See response to question 7.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	N/A
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes – given that these will have a direct impact on data entering into settlements we feel that DTC flows would be most appropriate mechanism.

Question 11	Any further comments on P218?
Answer 11	<p>We do have significant reservations regarding all options put forward for assessment. In each case there is significant change to existing baseline processes. Under P218 although data would be entering settlements it will just be an estimate. Although it could be argued that this is better than no data and as such P218 could be seen as better facilitating BSC objectives we do not believe that this is true.</p> <p>We do only have small amounts of data available but these seem to indicate that using a factor, be it as a single value or technology specific, is going to lead to significant inaccuracies in consumption data that enters into settlements. Microgeneration cannot be considered as a similar offering to unmetered Supplies as there are too many variables that make actual export consumption difficult to estimate even though capacity is known. With this in mind capacity of microgeneration becomes a key settlement related data item. We are unaware of processes for determining capacity for any microgeneration unit and are concerned that these will be used in settlements under this proposal without the type of stringent tests and compliance that is needed for measuring import consumption. From data shown for just four wind microgeneration sites factors range from 0.81% of generation capacity to 8.28%. This is a 10:1 ratio and as such we feel that using such factors leads inherently to incorrect data entering settlements.</p> <p>Presently, irrespective of if a Supplier settles export energy we are still required to obtain a MPAN to enable us to appoint agents, in particular MOP, so that export metering can be fitted. With this in mind we are already following majority of processes required under P081 and in terms of settlements all that is missing is that MPAN is never traded so no data is entered. Our experience does show that presently use of SSCs for export metering is not well understood and in many cases on meter fits details from MOPs show an import SSC even though MPAN is for export. These problems require resolution to ensure settlements under P081 processes would be successful. We have consistently stated that it is not process behind P81 that prevents us from settling export MPANs but other considerations. However, although we do not have full costings for all changes we believe that it would be cheaper for us to progress microgeneration MPANs if P081 was made mandatory rather than having to make changes to support a P218 solution that we do not support and would not want to use.</p> <p>We have noted changes being suggested and have a number of queries:</p> <p>1 – in section 2.1.1 why is there no export MPAN being held as part of microgeneration data. On first reading this was felt to be that no MPAN needed to be created for an export site but we do not think this is true due to current processes undertaken by current parties. This also seems to be true with “Microgeneration Registration Detail” in section 2.8.2. However, section 2.1.2 seems to suggest that MEO needs to know details of all MPANs to be included in a portfolio MPAN.</p> <p>2 – in section 2.1.2 it notes that MEO needs to know NHHDA, if this is for each MPAN as we believe then this seems sensible. However, we are unsure how this information is passed to MEO as this does not seem to be included in any new flows.</p> <p>3 – in section 2.5.2 constant mention is made to site having “same address”. What does this mean. It is noted that if there are multiple microgeneration sites that these must be registered to same Supplier. What if when export MPANs are requested addresses are differentiated by adding details into address line one of MPAN to enable such distinction. That is Export MPAN 1 has address “Export MPAN, 1 High Street” but Export MPAN 2 has “Export MPAN 2, 1 High Street”. In this case these would seem to have to be classed as same address but in this case each MPAN has a unique address and this would allow customer to chose to have different Supplier for each as customer could get a better deal in that manner particularly if export sites are different capacities and technologies. Limiting this</p>

Question 11	Any further comments on P218?
	<p>so that only one Supplier can manage all export at "same address" seems to be anti-competitive. This though might be a minor issue as it is not clear if there are likely to be many sites with more than one export installation.</p> <p>4 – at present if a Supplier wins an export site that is registered with a MEO they have to be able to communicate with that MEO, if only to de-register this site. Surely if this is to be a truly optional modification then process should only require that losing Supplier de-registers P218 site. In effect it informs MEO that it is losing site and MEO sorts out a final consumption figure to enter settlements and then basically considers that that site no longer exists. In that manner provided losing Supplier follows full process a new Supplier not using P218 would not be required to make any changes. Presently MEO transfers export to new Supplier if it does not hear otherwise. We do not feel that MEO should have responsibility for determining if a Supplier uses P218 as this would impact on settlement liabilities of Suppliers. With P218 though whatever solution is used for de-registration this is a further point of failure which can impact such that new Supplier ends up with export settling that it is unaware of or current Supplier having export settled after they should have lost that site.</p> <p>5 – in section 2.8.2 one of the new flows seems to be for moving an export MPAN from P081 into P218 process. We are not sure why a separate flow is required for this, surely this should just be a specific event indicator on "Microgeneration Registration Details" flow.</p>

Organisation:	Electricity North West Ltd		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	LDSO		
Assessor Name	Vara Tadi		
Contact Name (if different to Assessor)	Vara Tadi	BCA/PACA:	
Contact email:	vara.tadi@enwltltd.co.uk	Phone no:	07730074374

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	<p>Yes, ENW Ltd as a Distributor would be impacted by the following;</p> <p>Creation of Portfolio MPANs per Supplier</p> <p>Creation of new LLF's and LLFC's for microgeneration</p> <p>Changes to Distribution system to support microgeneration (providing a number range for the Portfolio MPANs).</p> <p>Support of Bulk Implementation if required.</p> <p>Finally for the proposed modification what address would be used for each of the Supplier's Portfolio MPAN (one MPAN per Supplier per Distribution GSP Group)?</p>

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>Approximately £50,000 to £100,000</p> <p>ENW Ltd would probably require at least 9 – 12 months implementing these changes</p>

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	<p>Yes, ENW Ltd as a Distributor would be impacted by the following;</p> <p>Creating an MPAN for each microgeneration technology within their GSP.</p> <p>Creation of new LLF's and LLFC's for micorgeneration</p>

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
	Changes to Distribution system to support microgeneration Support of Bulk Implementation if required.
Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Approximately £50,000 to £100,000 ENW Ltd would probably require at least 9 – 12 months implementing these changes
Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	We would not support solution 2 as it does not involve generating MPANs for the export microgeneration and therefore it would be difficult for Distributors to keep a record of these sites.
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	We would not consider this solution
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	The problem of creating the Skeleton Portfolio MPANs prior to the Supplier energising the microgeneration means that there will be redundant MPANs held within SMRS which may never be used and cannot be identified as microgeneration MPANs. Will all Suppliers have microgeneration? It would be simpler if Suppliers requested Portfolio MPANs as and when they required them as the Supplier could choose the P081 process and not use the P218 process.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	The problem of creating and registering Portfolio MPANs as de-energised prior to the Supplier energising the microgeneration means that there will be redundant MPANs held within SMRS which may never be used and cannot be identified as microgeneration MPANs. Will all Suppliers have microgeneration? It would be simpler if Suppliers requested Portfolio MPANs

Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
	as and when they required them, and went through the existing registration process, as the Supplier could choose the P081 process and not use the P218 process.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	If the Supplier opted to use P081 process then once the MPAN had been de-registered from the MEO system then ENW Ltd would disconnect the Portfolio MPAN. If the Supplier then wanted to use the P218 for the same site they would have to request a new MPAN. This is to ensure there is no duplication in the two processes
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes
Question 11	Any further comments on P218?
Answer 11	<p>The current arrangements for small unmetered equipment (less than 500 watts) have a number of safeguards in place to ensure accurate EAC calculation and minimal distributed losses.</p> <p>We are not convinced that the current proposal would ensure that an accurate assessment of the generated load from a micro generation source would be established by the newly appointed Micro-generation Export Operator.</p>

Organisation:	Gemserv Ltd		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	MRA Service Company Ltd (MRASCo)		
Assessor Name	Brendan McGarry		
Contact Name (if different to Assessor)	Brendan McGarry	BCA/PACA:	
Contact email:	brendan.mcgarry@gemserv.com	Phone no:	020 7090 1035

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	<p>Yes.</p> <p>As detailed within the requirements specification document there are a number of changes proposed to the DTC. As MRASCo administers the DTC, if this modification was approved, change proposals to implement the required changes to the DTC would need to be raised and progressed through the MRA change process.</p> <p>Some changes would also need to be made to clauses of the Master Registration Agreement (MRA), in particular:</p> <ul style="list-style-type: none"> • Definition of a Metering Point; and • Clause 15, specifically 15.1 but possibly to elsewhere within Clause 15.

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>The cost and impact of the proposed changes on MRA parties has not been included within the response below.</p> <p>Changes to DTC - Implementation timescales:</p> <ul style="list-style-type: none"> • From point CP is submitted to MDB decision – approximately 1 month • From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and November). <p>Changes to MRA – Implementation timescales, in addition to those above:</p> <ul style="list-style-type: none"> • The changes to the MRA highlighted in Answer 1 are Priority Provisions of the MRA and therefore change to these will require Authority consent. <p>Cost and Resourcing Costs:</p> <ul style="list-style-type: none"> • No additional costs over and above normal operating requirements would be incurred by MRA parties

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes. The DTC changes required for the proposed modification would still be required for the alternative modification solution 1.
Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	As per answer 2
Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes. As detailed within the requirements specification document there are a number of changes proposed to the DTC. As MRASCo administers the DTC, if this modification was approved, change proposals to implement the required changes to the DTC would need to be raised and progressed through the MRA change process.
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	As per answer 2
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	Neutral
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Neutral

Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	n/a
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Neutral
Question 11	Any further comments on P218?
Answer 11	<p>Section 2.4.5 – It is our understanding that portfolio MPANs would need to be registered as energised initially before being de-energised by the Supplier in order that the registration process is completed within SMRS (otherwise the MPAN would be a “partial registration”).</p> <p>Section 2.4.9 – The text should read “each SMRS would create the relevant portfolio MPANs” rather than “each SMRS would register the relevant portfolio MPANs”.</p> <p>Section 2.7.1 – If it is agreed that a DSO would, following a request from the Supplier, logically de-energise the portfolio MPAN, then there may need to be a new value added to the Disconnection Type valid set (included within the D0132 data flow).</p> <p>Section 2.8.2 – Not all of the data items listed for each proposed new DTC flow would need to be created. Some of these or similar data items already exist. For example GSP Group ID (J0066) and Distributor ID (J0512) are existing data items that could be utilised within the proposed new DTC flows. We would suggest that were appropriate new valid sets are created for Data Items, e.g. Event Indicator valid set.</p> <p>Section 2.8.3 – We would suggest that the following DTC flows would also be impacted: D0168 and possibly the D0132 as mentioned above. The MEO would also be expected to send/receive the D0011 and D0148. If the MEO is set up as a NHHDC within MDD then these data flows would not need to be amended. Consideration should be given as to whether the MEO should receive the D0171 and D0203 in relation to energisation status changes notified to the SMRS by the Supplier.</p> <p>Section 3 – The SSC data item is optional within both the D0055 and D0019 DTC flows. It is possible to add notes for a particular DTC flow to clarify when a data item should be populated within a DTC flow.</p> <p>Throughout Document, use of “Additional Information” data items within DTC flows – it is suggested on a number of occasions that the Additional Information field within a DTC flow would be used to provide more detail about the MPAN to the recipient of the DTC flow and that in some instances the completion of this information is mandatory (for example, section 2.4.6, D0155 data flow). We would suggest that notes be included within the DTC to explain when additional information is required and what should be included.</p> <p>Validation of DTC Flows – If new DTC flows are introduced or the use of existing flows is amended this may have implications on the validation of those flows by participants. For example, section 2.5.1 details the proposed requirement for the Supplier to send a D0205 to the MEO (at the same time as it is sent to the SMRS) to confirm that the energisation status of a portfolio MPAN has been updated. This would require the Supplier to apply validation such that only D0205s for portfolio MPANs are copied to the MEO (as opposed to all D0205s for energisation status changes being copied to all NHHDCs) and that only those D0205s confirming updates to the energisation status (and not any other data update) are copied to</p>

Question 11	Any further comments on P218?
	<p>the MEO.</p> <p>Unique Identifiers for Export Sites – Previous experience would indicate that being unsure of the location of a Metering Point (or in the case of P218, an export site) and not having a unique identifier (i.e. MPAN) to identify such sites will lead to data quality problems within the industry. There may be doubling counting of export sites where duplicate sites are registered with the MEO, conversely some sites may be excluded from Settlement where different sites are erroneously identified as being identical.</p> <p>Access to and use of ECOES – Currently access to ECOES is only provided for the purpose of assisting Suppliers with the Change of Supplier process. Access to ECOES may be provided to the MEO but this would need to be approved by the MRA Development Board (MDB).</p>

Organisation:	IMServ		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	NHHDC / NHHDA Agent		
Assessor Name	Stuart Scott		
Contact Name (if different to Assessor)	Clare Hannah	BCA/PACA:	PACA
Contact email:	Stuart.scott@imserv.com	Phone no:	01908 696000

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	<p>The change would have an impact on our organisation in so far as we as an NHHDA agent would have a new interface to the newly created MEO and would receive D0019s files from the party agent. Some additional training and changes to work instructions may be required to reference the new party agent and document the new interface, but these would be minimal impact.</p> <p>LogicaCMG have also confirmed our initial thoughts that there is no impact on the NHHDA application so no system impacts.</p>

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	As discussed above the main impacts are in the training, awareness and user documentation (procedures and Local working instructions) areas.

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Same impact as in answer 1.

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Same impact as in answer 1.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	No impact as both NHHDC and NHHDA would not be used in this solution.

Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	None.

Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	Yes, we believe that this would be the best approach to take. At least this guarantees that as part of the implementation phase a set of MPANs are reserved to uniquely identify export sites and means that the process is in operation from day one rather than leave it for suppliers to pick up as and when they wish to use the process. It sets an initial standard to follow within the implementation phase which business as usual can then follow.

Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Yes for the same reasons as above.

Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	Not a DSO so not applicable.

Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).

Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes, better to have standards and stick to them as it generally ensures consistency of approach and use.

Question 11	Any further comments on P218?
Answer 11	None

Organisation:	RWE Npower		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>		
Assessor Name	Louisa Stuart-Smith		
Contact Name (if different to Assessor)		BCA/PACA:	David Mayne
Contact email:	Louisa.stuart-smith@npower.com	Phone no:	(01905) 340408

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>Due to the timescales of this Impact Assessment we have only been able to carry out a very high level assessment. Our initial assessment suggests that if approved the impact of P218 (Proposed) would be substantial.</p> <p>The following are a number of the impacts that have been identified by our Supply business:</p> <p>Changes to the Gains process (e.g. to customer take-on systems and contracts) to determine whether a new customer/site wishes us to also take responsibility for existing microgeneration capability at that site (it appears to be the responsibility of the Gaining Supplier to work out that a site has microgeneration - no suggestion that this will be in ECOES or communicated on, say, the D0217);</p> <p>Some sort of "audit" of the microgeneration capability (i.e. it is the Supplier's responsibility to verify the capability claimed by the customer);</p> <p>Changes in the Loss process (new flow) to record the fact that a microgeneration capability has been Lost;</p> <p>Changes to the existing Objections process (new flow) for microgen export;</p> <p>The ability to Lose only the microgeneration capability to another Supplier (while retaining the Import MPAN);</p> <p>Changes to Billing to ensure that a customer is appropriately credited for the microgeneration capability recorded;</p> <p>Changes to the Registration process so that on the Supplier Start Date of the Import MPAN the microgeneration capability is "logged" with the MEO using one of the new DTC flows;</p> <p>In addition to these impacts there are a considerable number of specific requirements that would impact our internal systems.</p> <p>The high level cost estimate for a solution to be developed on our Supply systems would be</p>

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
	<p>£3-4m. This estimate does not include the impact on our Party Agent systems.</p> <p>The NHHDA has identified that a change to NHHDA is required to recognise D0019 and associated data from the new industry participant. Must therefore have D0023s that can be returned back to MEO. File sequence order and instruction orders will be required for each D0019. Need to change functionality within NHHDA including log files and reports (e.g. MS EACAA History Report) – which would require detailed impact analysis and costing from ELEXON.</p> <p>The NHHDA felt that to enable a full impact assessment on Supplier Agent systems the scenarios need to be brought down to lower levels before costs and timescales can be submitted.</p>
Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes
Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	The impact and costs of P218 (Alternative 1) would be similar to those identified for P218 (Proposed).
Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	No specific detailed analysis on P218 (Alternative 2) has been able to be carried out in the timescales but it is possible that the costs might be reduced slightly for P218 (Alternative 2)
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	<p>We would prefer it if the creation of portfolio MPAN's was not part of a bulk implementation process.</p> <p>If portfolio MPAN's are created we would prefer it if they are within a specific range to aid</p>

Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
	identification and would suggest the process to request MPAN's is carried out outside the existing P168 process.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	As above we would prefer it if this is only carried out should a Supplier decide to use the P218 process.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	N/a
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	We feel the number, type and complexity of the proposed new flows and processes mean that they would need to be DTC flows
Question 11	Any further comments on P218?
Answer 11	No

Organisation:	SAIC on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Supplier, NHHDC, NHHDA, Distributor, MOA		
Assessor Name	Bryan Donnelly		
Contact Name (if different to Assessor)		BCA/PACA:	BCA
Contact email:	<u>Ukelectricityspoc@saic.com</u>	Phone no:	01355845353

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes.

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>There would be an impact on Supplier and NHHDA systems. There would also be a cost impact on the DSO implementing and managing the new arrangements. At present costs cannot be calculated but they are expected to be high on a corporate level to accommodate new DTC flows and changes to datasets and internal processes</p> <p>We would require at least 270 days to implement</p>

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	The impact would be as in the original proposed modification. However there may be further costs in using technology specific MPANs.
Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	As per the original modification. However the implementation of Solution 2 would result in no impact for the NHHDA and therefore reduced costs at a corporate level.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	No. We believe that Portfolio MPANs should be established as and when requested by specific Suppliers. This process should be carried out within an agreed time frame
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	No. Suppliers should have the ability to choose to register portfolio MPANs as and when they decide to use P218
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	The MPAN would be disconnected
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes. Using the DTC would provide greater data integrity and a clearly auditable trail.

Question 11	Any further comments on P218?
Answer 11	<p>P218 though an interesting concept is fatally flawed on a number of levels.</p> <p>The size of the sample size to reach conclusions on calculating estimates of export is not large enough to give any meaningful data. This is a serious issue and will lead to significant errors being passed into Settlement. Even if the size of the sample was statistically valid and carried out over a number of years (unlikely such data exists on a national level) there is still a high risk factor when adding estimates into the Settlement process. Export levels are very site-specific due to positioning and specific variances between sites such as average wind speeds for turbines and available light in the case of PV.</p> <p>There is a need for further research to be done on these types of sites. In other words we need to see evidence that there is indeed an issue and a appreciation of the materiality involved, before a solution is proposed. As a result, we believe ELEXON should be mandated to collect Half Hourly data for a sample of sites covering all microgeneration types for at least a year, with the costs involved being picked up by the Industry as a whole. In addition, further research needs to be done to understand that if microgeneration is actually being spilled onto the Network, can it be effectively diverted to and used by other Customers?</p> <p>Within Unmetered Supplies, which the modification is based on, the PWC audit has flagged up significant error being introduced into Settlement each time it has been included in the annual audit. By following P218, more error will be introduced which will, by it's very nature, be harder to quantify due to the very nature of renewable and microgeneration. Renewable energy by its nature is intermittent and the weather is to a greater or lesser extent unpredictable and varies year to year. Microgeneration export will also be affected by consumption on site and therefore again is of an extremely unpredictable nature.</p> <p>There is also the issue of aging equipment. The lifespan of equipment can vary by as much as 10 years or more. Will this be factored into the export factors? If not we run the potential risk of equipment which has passed its lifespan, still being entered into Settlements despite the fact that generation has dropped or even ceased.</p> <p>Will the cost of inspecting installations be picked up by the Supplier in the form of service charges or by the customer? Have these costs been factored in and compared to current service and metering charges. If not then we run the risk of creating the very problem we are trying to fix</p> <p>Under UMS, the UMSUG approves equipment for use in UMS. There is a clear need for such a process to be introduced to validate claims by manufacturers by using industry accepted testing procedures. This would then have to be factored into site specific calculations. Therefore, an extra level of complexity is required for calculating export figures.</p> <p>If this route was to be followed there would also be a requirement for a microgeneration equivalent of the UMSUG.</p> <p>In terms of current market structure P81 already exists for those sites which export enough energy to warrant metering. For those sites generating under 400KW per annum it is not at present economic to meter. This means that the earnings from these sites must be under £16 per year as this is the cost of metering and servicing the account. Though it should be the aim of the industry to reward such generators who currently spill onto the network the current proposal does not benefit the market as a whole. A far better solution would be to wait until smart metering or at the very least inbound/outbound AMR (becoming available in the commercial sector) arrives in the domestic market. This will negate the costs of meter reading and thus the costs should be lower and therefore reward the smaller exporters.</p> <p>In terms of the detail of the proposal. There is a process to move a P81 traded site to a P218 traded site. There seems to be no scope to incorporate the export readings from these sites into the new process and thus valuable accurate data will be discarded and the export will be</p>

Question 11	Any further comments on P218?
	<p>traded on an inaccurate estimate. This seems to be counter-intuitive.</p> <p>The industry is currently looking at the issue of Effective from Settlement dates due to the lack of a standard dating method between agents and parties. The proposal seems to assume that a standard methodology would exist within this area. This may be a flawed assumption and perhaps the modification if it is to go forward should consider the outcome of CP1225. This may reduce the risk of future problems around this area.</p> <p>In terms of technology specific MPANs, it is stated that a non-technology specific solution gave better results. We feel it would be preferable to use technology specific MPANs as this would allow more opportunity to re-calculate estimates as more accurate sample data becomes available over time.</p> <p>We also have concern over the use of import MPANs (MPANI). The MPANI is not available to the new Supplier, thus this could not be provided by the new Supplier who gains the site. As import and export can be provided by different Suppliers there is the risk of breaking industry guidelines of availability of MPAN information. We could end up in the situation where Suppliers would hold information on the MPANs of other Suppliers. This would therefore mean that registration would be based on addresses of sites which in the past has caused the industry numerous problems.</p> <p>A number of questions also arise.</p> <p>If the MEO is to be given access to ECOES will they be accountable for part of the costs associated with the upkeep of ECOES?</p> <p>Does the number of microgenerators falling outwith P81 warrant the costs of establishing P218 and can this cost be justified when a smart metering solution may well be available for such customers within the next 5 to 10 years in the UK. From the figures given in the document of various installations there are at present only 3,036 potentially exporting to the network if you discount PV water heating, geo-thermal heat pumps and biomass boilers which do not in themselves generate electricity but save on consumption from the grid. Thus the number of actual sites to be traded is currently inconsequential and suggests that further work should be undertaken into smart metering to address the issue dealt with in P218, as and when it comes to market.</p> <p>To summarise, it is our belief that, though the issue of microgenerators spilling onto the network without recompense should be rectified, the current modification is not the solution. It will introduce error into Settlement; it will be costly and will be overtaken by metering developments in the near future thus making it redundant and unnecessary. Further, the biggest issue is that if this Modification is approved it would in affect replace one 'potential' Settlement error (i.e. the ability to account for spill) with another i.e. the Generation input into Settlements will not be an accurate reflection of what is actually happening. The only real difference is that Suppliers would have to pay significant amounts (e.g. >£100K) to facilitate these changes, as well as our own internal costs. One of the major stumbling blocks to this Mod is that it is based on theoretical conclusions which are not backed up with any hard evidence! Given the general consensus, is that the amount currently being spilled is not material, why proceed at this time at all? If it is material, surely you would use the P81solution.</p>

Organisation:	Siemens Energy Services		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Party Agents (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO).		
Assessor Name	Lisa Smith		
Contact Name (if different to Assessor)		BCA/PACA:	PACA
Contact email:	Mtrchgctrl.ses@siemens.com	Phone no:	0115 9066774

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	This would impact SES in the role of NHHDA.

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	Please refer to our response to question 11. Currently we believe that this would require small changes to standing data within the NHHDA system. We do not believe this has a significant impact to our processes, but would require clarification if the modification were to be progressed.

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	This would impact SES in the role of NHHDA.

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Please refer to our response to question 2.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	We do not believe that this proposal would impact us. Please also refer to our response to question 11.

Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	N/a
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	Cannot comment on this as a party agent.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	Cannot comment on this as a party agent.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	Cannot comment on this as a party agent.
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Please see our response to question 11, as we do not support P218, we do not feel it would be appropriate to answer this question.
Question 11	Any further comments on P218?
Answer 11	<p>Whilst we support the concept of allowing more microgeneration to be accounted for within Settlement, and recognise that these proposals may reduce costs for Suppliers, we do not see how P218, or either of the alternative proposals tackles the issues of the data accuracy.</p> <p>The UMS type of approach doesn't seem to meet the requirements for microgeneration. Microgeneration is an unpredictable load that can be easily metered where as street lighting supplies have a predictable load and are uneconomic to meter due to the huge numbers of pieces of plant involved.</p> <p>We are concerned that if any of these modification proposals are accepted, then there could be a detrimental impact on Settlement, due to the use of estimation methods in cases where there are variable loads. The amount of energy exported depends on a number of variable factors, none of which appear to have been captured by the annual export calculation. As a result of this potential inaccuracy, there is significant scope for consumer disputes concerning the volume of energy being exported. This could lead to further increased industry costs,</p>

Question 11	Any further comments on P218?
	<p>such as the potential for additional site visits. For example, if a customer has gone to the trouble of putting expensive generation equipment in place to be 'green', but then gets told, we've 'Estimated' your exported energy at £X, then if they disagree there is no basis for the Supplier accurately accounting for the export payment over and above the equation, which treats all exported metering the same.</p> <p>Furthermore, the introduction of SMART metering in the future, will necessarily include consideration of export technology and its impact on the BSC. These changes may negate this proposal, or at least require it to be revisited. Therefore it may be worthwhile deferring P218 until Smart Metering is underway, and then reconsider it in light of any changes smart metering brings. If a solution is required in the meantime then it may be more beneficial to concentrate on better use of the current process, rather than creating a new one at extra cost to the industry.</p>

Organisation:	Southern Electric Power Distribution; Keadby Generation Ltd; SSE Energy Supply Ltd; SSE Generation Ltd; Scottish Hydro-Electric Power Distribution Ltd; Medway Power Ltd;		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	Supplier/Generator/ Trader / Party Agent / Distributor		
Assessor Name	Cher Harris		
Contact Name (if different to Assessor)		BCA/PACA:	
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Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	Yes

Question 2	If impacted by the Proposed Modification, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 2	<p>Impacts would include: creation and maintenance of portfolio MPANs; creation, approval and assignment of new MDD values (e.g. LLFCs & MTCs); support for new DTC flows and interface with new agent (MEO); maintenance of microgen installation records and maintenance of registration records. These impacts will result in some up front development costs (e.g. implementing the new flows) and on-going maintenance costs. There will also be costs associated with the creation of the central MEO agency service.</p> <p>We would require a lead-time to develop and implement of approx 9 months.</p>

Question 3	Would Alternative Modification P218 solution 1, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 3	Yes

Question 4	If impacted by the Alternative Modification solution 1, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 4	Similar to answer 2, with the additional effort on the Distributor to create multiple portfolio MPANs for each Supplier for each technology.

Question 5	Would Alternative Modification P218 solution 2, as outlined in the attached Requirements Specification, impact on your organisation?
Answer 5	Yes
Question 6	If impacted by the Alternative Modification solution 2, please provide a description of the impact, costs and required implementation timescales (from the point of Authority approval) for your organisation.
Answer 6	As this solution does not require the creation and registration of portfolio MPANs, it would appear to reduce the impacts, and therefore costs, slightly. We would require a lead-time to develop and implement of approx 9 months.
Question 7	Do you believe skeleton portfolio MPANs should be created by the DSOs for all Suppliers as part of a bulk implementation process or should Suppliers request the creation of portfolio MPANs if and when they decide to use the P218 process (see section 2.3.2 of the Requirements Specification).
Answer 7	On the face of it, it would appear simpler to create skeleton portfolio MPANs for all Suppliers as part of a bulk implementation process, however, it would depend on how many Suppliers are likely to adopt this optional process – i.e. if only a small number of Suppliers are going to actually use P218, then it would be significantly less work to only create portfolio MPANs on request.
Question 8	Do you believe portfolio MPANs should be registered in SMRS for all Suppliers as part of a bulk implementation process or should Suppliers choose to register portfolio MPANs if and when they decide to use the P218 process (see section 2.4.9 of the Requirements Specification).
Answer 8	As per answer 7, it is difficult to say without knowing the likely uptake of this solution, however, I would suggest it is probably best to allow Suppliers to register if and when they chose to start using P218.
Question 9	As a DSO would you allow Export MPANs to be disconnected or would the MPAN need to remain (see section 2.7.1 of the Requirements Specification).
Answer 9	We would expect the MPAN to remain if there was any likelihood of future use.
Question 10	Do you believe all of the flows described in section 2.8.2 should be DTC flows. It should be noted that MRASCo will be carrying out a P218 impact assessment in parallel with the Party impact assessment.
Answer 10	Yes as it would place them into formal governance and therefore they would be subject to formal change control.

Question 11	Any further comments on P218?
Answer 11	<p>I believe this is likely to be a temporary fix. As the market pushes localised generation growth, the nice distinctions between generation types start to disappear. In effect what we are looking at is non half hourly measured generation and unmetered generation. Along with SMART metering - this heralds the need for a radical and fundamental review of 'lower volume' arrangements.</p>

Organisation:	UNITED UTILITIES		
Capacity Organisation operates in (e.g. Supplier, HDDC, etc.)	NHH & HH MOA		
Assessor Name	CHRIS LAWTON		
Contact Name (if different to Assessor)	MICHELLE DERBYSHIRE	BCA/PACA:	
Contact email:	Michelle.derbyshire@uuplc.co.uk	Phone no:	0161 875 7071

Please provide responses to the following questions:

Question 1	Would Proposed Modification P218, as outlined in the attached Requirements Specification, impact your Organisation?
Answer 1	The proposal is likely to have a negative impact on future Microgeneration metering work for Meter Operators.

Question 11	Any further comments on P218?
Answer 11	<p>Whilst it is accepted that Suppliers have difficulties with small generators, the problem is believed to lie in their systems' inability to accept export data rather than with the metering.</p> <p>Micro generation bears little resemblance to street lighting supplies, the key requisite of which are that individual power levels are low, are predictable and are uneconomic to meter because of the huge numbers involved.</p> <p>Microgeneration will involve significantly higher power levels, will be highly unpredictable (net export will depend on the customer's load and the wind speed/sun level etc). Hence, any estimates of export will be inherently inaccurate. In addition, even allowing for significant growth in installation numbers, Microgeneration is expected to remain both easy and cheap to meter accurately under Elexon CoP9</p> <p>It is believed that the proposal will reduce data accuracy, unnecessarily, and thus have an adverse impact on the Settlements system.</p> <p>Replacement of measured values with what at best will be estimates will not reward customers accurately for their generation and the inevitable blurring of import, export and internal consumption will adversely affect the promotion of positive behaviours in respect of climate change/carbon saving requirements.</p>