

Responses from P213 Assessment Report Consultation

Consultation Issued 1 June 2007

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	IMServ Europe	P213_AR_01	0	3
2.	E.ON Energy Services	P213_AR_02	0	1
3.	Good Energy Ltd	P213_AR_03	1	0
4.	British Energy Direct Ltd	P213_AR_04	5	0
5.	E.ON UK	P213_AR_05	10	0
6.	Western Power Distribution	P213_AR_06	2	1
7.	Scottish & Southern Energy PLC	P213_AR_07	6	1
8.	The Micropower Council	P213_AR_08	0	1
9.	Siemens Energy Services	P213_AR_09	0	6
10.	EDF Energy	P213_AR_10	9	0
11.	npower Ltd	P213_AR_11	10	0
12.	Centrica	P213_AR_12	9	0
13.	AccuRead Limited	P213_AR_13	0	3
14.	Scottish Power Plc	P213_AR_14	4	2

## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Stephen Johnson</i>
<b>Company Name:</b>	<i>IMServ Europe</i>
<b>No. of BSC Parties Represented</b>	<i>0</i>
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>3</i>
<b>Non Parties represented</b>	<i>UKDC – NHHMO, NHHDC, NHHDA</i>
<b>Role of Respondent</b>	<i>NHHDC, NHHDA, NHHMO</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	No	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes / No	N/A
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes/ No	N/A
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	N/A
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	No	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	There is no need to force a Supplier to have to adopt this process if they don't want to – and there may be benefits in two separate MPANs, two different Suppliers etc
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	No	

Parties are encouraged to provide financial information with regard to either the costs or benefits of the Modification Proposal to support the Assessment Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

Please send your responses by **12:00 noon on Friday 15 June 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P213 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

Any queries on the content of the consultation pro-forma should be addressed to Ysanne Hills on 020 7380 4162, email address [ysanne.hills@elexon.co.uk](mailto:ysanne.hills@elexon.co.uk).

<sup>1</sup> The options currently being considered by the Group are described in detail in the Requirements Specification, which has been issued for Impact Assessment at the same time as this Initial Consultation.

## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Alastair Barnsley</i>
<b>Company Name:</b>	<i>E.ON Energy Services Limited</i>
<b>No. of BSC Parties Represented</b>	<i>0</i>
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>1</i>
<b>Non Parties represented</b>	<i>E.ON Energy Services Limited</i>
<b>Role of Respondent</b>	<i>Party Agent</i>
<b>Does this response contain confidential information?</b>	<i>yes</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	We have a limited number of NHH Export sites for which we are registered as MO but we have none for which we are appointed as DC
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	This detail is not currently available
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes / No	N/A
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes	The consumption between export readings would be calculated and sent on the corresponding D19. However if we add the export value to the import value the settlement performance would not be accurate. If there is the possibility Nett the export and import values this would provide more accurate settlement data.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		There is only 1 MPAN to maintain, reading and settlement data is all in one place without the need for cross referencing.
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	N/A
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	N/A
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	No	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	No	Strictly from our perspective as a Party Agent we believe that the solution proposed in P213 should be obligatory as this would avoid confusion about the correct procedures to be followed and the risks to settlement associated with any confusion.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	No	

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<b>Respondent:</b>	<i>Chris Welby</i>
<b>Company Name:</b>	<i>Good Energy Ltd</i>
<b>No. of BSC Parties Represented</b>	<i>1</i>
<b>Parties Represented</b>	
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<i>Supplier</i>
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	A handful, most of our micro-generators are not registered in settlements for export
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	We only register sites with an export capacity > 10kW where a significant majority is exported rather than used on site
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes & No	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	The process itself is the same as any CoS or new connection. The fact that it is export is irrelevant.
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	Nearly all our sites are paid for total generation using CoR of generation meters
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	No	Unlikely. While a significant step forward, we still believe paying Customers for total Generation offers better value.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	In Carbon terms we need to encourage customers to use the energy on site. Exporting is 2 <sup>nd</sup> best. It is our policy to reward Customer for Generation rather than export.
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	It would still be more expensive than our current policy of paying on total generation, and provide less income to customers.
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	The arrangement should offer Customer choice. P213 is about facilitating, not dictating.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	Yes	P213 is about facilitating. One thing that has not been covered is the need of the Supplier to de-register the export should they not want the export included in settlements.

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<b>Respondent:</b>	Deborah Bird
<b>Company Name:</b>	British Energy Direct Ltd
<b>No. of BSC Parties Represented</b>	5
<b>Parties Represented</b>	British Energy Direct Ltd, British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	-
<b>Non Parties represented</b>	-
<b>Role of Respondent</b>	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>
<b>Does this response contain confidential information?</b>	No

Q	Question	Response	Rationale
1.	Do you have any NHH Export sites? Please provide details.	No	Not at this moment in time.
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	-
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes	As already stated we do not currently have any NHH Export MPANs, however, we follow existing BSCPs for the registering of HH Export and would do the same for any NHH Export MPANs acquired in order to ensure data was used in Settlement.
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	We do not have any problems with the current process.
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	-

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	-
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes/ No	To maintain the accuracy of Settlement, we are of the opinion that NHH Export should always be recorded in Settlement. We are of the view that the ability to register using 1 instead of 2 MPANs should not have an impact on this.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		-
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	-
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	-
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	-
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	-

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	No	To ensure consistency there should only be one process and this should be the existing arrangements introduced by P081. A choice of options will only create confusion and inaccuracies in Settlement.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes/ No	We are of the opinion that the current arrangements (introduced by P081) to register Export MPANs in Settlement is acceptable and should remain. It would be more beneficial to Settlement to ensure that this process is followed by all.
8.	Are there any further comments on P213 that you wish to make?	Yes	<p>We are concerned that the new P213 process discourages competition and is not in the best interest of the customer. Currently, a customer can choose to register the Import and Export MPANs separately with different Suppliers. Implementing P213 would remove this choice of Supplier thus reducing consumer choice.</p> <p>Having Import and Export on the same MPAN would distort Settlements and, to maintain the accuracy of Settlement, Import and Export should be recorded as separate MPANS.</p> <p>It would seem more beneficial to use the current arrangements (introduced by P081) to register Export MPANs in Settlement and work towards making it compulsory for all Suppliers to follow.</p>

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<b>Respondent:</b>	<i>Colette Baldwin</i>
<b>Company Name:</b>	<i>E.ON UK</i>
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state <sup>1</sup>)</i>
<b>Does this response contain confidential information?</b>	<i>Yes</i>

Q	Question	Response	Rationale
1	Do you have any NHH Export sites? Please provide details.	Yes / <del>No</del>	Inherited one site with import/export metering on a Change of Supplier event, which only came to light by checking our settlement information rather than by design
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	1	Error in classification – being investigated
2	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	<del>Yes</del> / No	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	

<sup>1</sup> Delete as appropriate – please do not use knockout, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	We need to make changes to our customer management and billing systems to recognise export and reward the customer.
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	168 – non settlement meters registering an average of 1111 Kwh/annum 215 – sites where excess generation is spilled and deemed (value of export not calculated) The remainder of our NHH Export customers are managed in two ways – some customers have non-fiscal export meters which we use to monitor the energy exported and reward the customer with a ex-gratia payment on a pence per/kwh basis. The remainder of the customers who don't have metering are PV customers – we have a macro which works on deeming an estimated level of export based on house type & occupation levels, location, size of PV array, time of year. We round this estimate up to the nearest £5.00
3	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes/ <del>No</del>	We would wish to maximise the value that could be attributed to the energy exported from the unit. We believe this solution would reduce our customer service costs (including MPAN acquisition, registration and set up costs, together with the ongoing costs associated with managing a second MPAN), our agent costs, our billing costs and when coupled with other services would offer a full customer solution that would encourage customer retention.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		Based on 2 main factors: <ul style="list-style-type: none"> <li>• Energy value of single MPAN solution not eroded by management costs</li> <li>• Removing the potential difficulties which surround the change of supplier/tenancy and agent processes – stranded MPANs, inadvertent breach of contract, metering problems, DNO requirements and potential double reward</li> </ul>
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	

Q	Question	Response	Rationale
4	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	Registration and customer management cost of a separate MPAN would be removed and we would see this as an additional line on a customers record. We would remove the costs to acquire, costs to serve and cost to defect for the second MPAN. Metering costs would be based (in the case of a combined import/export meter) on the multi-register rate rather than two separate systems. Distribution costs per MPAN would be removed for the export element.
5	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	
6	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	No	Where one supplier is involved in the customer offering, it should be a requirement that there is one MPAN; where the customer chooses to use two providers, the export provider should be responsible for the creation and disconnection of a separate MPAN at the end of such relationship.
7	Do you believe there are any other solutions or options <sup>2</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes/ No	No – P02 reviewed many potential solutions and this was the recommended way forward.
8	Are there any further comments on P213 that you wish to make?	Yes / No	Please see the attached document outlining some of the problems associated with the change processes involving 2 MPANs.

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<b>Respondent:</b>	<i>Graham Smith</i>
<b>Company Name:</b>	<i>Western Power Distribution</i>
<b>No. of BSC Parties Represented</b>	<i>2</i>
<b>Parties Represented</b>	<i>Western Power Distribution (South West) Ltd Western Power Distribution (South Wales) Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>1</i>
<b>Non Parties represented</b>	<i>Western Power Distribution Meter Operator Agent</i>
<b>Role of Respondent</b>	<i>Party Agent / Distributors</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	N/A	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	N/A	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	N/A	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	N/A	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	N/A	

Q	Question	Response Error! Bookmark not defined.	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	N/A	
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	N/A	
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.	N/A	
3b.	If no, why wouldn't you use these processes? Please provide rationale.	N/A	
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	N/A	
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	About 210	Approx 180 single phase, 30 polyphase. All of these are our standard meters so would be suitable for settlement purposes.

Q	Question	Response Error! Bookmark not defined.	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	The P213 process requires a single supplier for both import and export. The existing 2 MPAN solution must remain for as long as the customer is entitled to use different suppliers for import and export.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	No	

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Please send your responses by **12:00 noon on Friday 15 June 2007** to [modification.consultations@elexon.co.uk](mailto:modification.consultations@elexon.co.uk) and please entitle your email 'P213 **Assessment Consultation**'. Please note that any responses received after the deadline may not receive due consideration by the Modification Group.

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<sup>1</sup> The options currently being considered by the Group are described in detail in the Requirements Specification, which has been issued for Impact Assessment at the same time as this Initial Consultation.

## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Cher Harris</i>
<b>Company Name:</b>	<i>Scottish &amp; Southern Energy PLC</i>
<b>No. of BSC Parties Represented</b>	<i>6</i>
<b>Parties Represented</b>	<i>SSE Energy Supply Ltd, SSE Generation Ltd, Keadby Generation Ltd, Medway Power Ltd, Southern Electric Power Distribution plc, Scottish Hydro-Electric Power Distribution Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>1</i>
<b>Non Parties represented</b>	<i>SSE Power Distribution Ltd</i>
<b>Role of Respondent</b>	<i>Supplier/Generator/ Party Agent / Distributor</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	No	
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	Existing process is fit for purpose and cost justified. There is no need to develop another process to carry out the same task.
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	In terms of 'business as usual' administration, the cost differential would be minimal between existing P81 and proposed P213. We are yet to be convinced that there is a tangible benefit to the customer if the new P213 process is implemented. Indeed the high cost of implementation in the short term could possibly have a negative impact on export reward.
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	No	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	Competition in microgeneration is at its very early stages. Having this mod as an option will allow the market to develop in whichever way gives the customer the best return. If this was the only option there would be no competition in export, only the existing competition in import. You could argue the same case for only having 1 ID for gas and electric as most customers opt for a dual fuel package.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes	Mandate the registration of export meters.
8.	Are there any further comments on P213 that you wish to make?	Yes	We believe that P213 is an unnecessary modification which will deliver minimal benefits to customers. Mandating of export meter registration under P81 would protect the settlements system from imbalances caused by unregistered microgeneration spill.

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Name: Jonah Anthony</i>
<b>Company Name:</b>	<i>The Micropower Council</i>
<b>No. of BSC Parties Represented</b>	
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>See below</i>
<b>Non Parties represented</b>	<i>The Micropower Council's membership is drawn from across the whole spectrum of stakeholders operating in the Micropower sector. This includes electricity and gas companies, manufacturers, trade associations, professional institutions, not-for-profit companies, non-government organisations, charities and private individuals, all of whom have a strong interest and expertise in the development of the micropower sector. A list of our members is available at <a href="http://www.micropower.co.uk/council/members.html">http://www.micropower.co.uk/council/members.html</a></i>
<b>Role of Respondent</b>	<i>The Micropower Council provides the micropower industry's (including all low carbon micro heat and electricity technologies) main focal point for Government, regulators, Parliament and opinion formers on regulation and public policy issues affecting the production by consumers of their own sustainable heat and power.</i>  <i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state <sup>1</sup>)</i>
<b>Does this response contain confidential information?</b>	<i>NO</i>

Q	Question	Response	Rationale
1.	Do you have any NHH Export sites? Please provide details.	No	

<sup>1</sup> Delete as appropriate – please do not use strikethrough, this is to make it easier to analyse the responses

Q	Question	Response	Rationale
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	n/a	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	n/a	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	n/a	
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	n/a	
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	n/a	
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.	n/a	
3b.	If no, why wouldn't you use these processes? Please provide rationale.	n/a	
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	n/a	

Q	Question	Response	Rationale
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	n/a	
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	n/a	
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Unsure	<p>To answer this question, the Micropower Council believes it is necessary to understand:</p> <ul style="list-style-type: none"> <li>• what, if any, further benefits could be achieved in terms of simplification/streamlining processes and reducing costs if the “single MPAN” option is mandatory for some (possibly just the smallest) or all customers; and</li> <li>• what extent the dual MPAN approach would become redundant if the single MPAN option is developed, which is in turn affected by: <ul style="list-style-type: none"> <li>○ the likelihood that customers are going to want to have separate suppliers for import/export;</li> <li>○ the likelihood that suppliers will want to offer independent import/export arrangements to customers (particularly if the single MPAN solution is less costly for them).</li> </ul> </li> </ul> <p>If it is clear that the dual MPAN option is unlikely to be used by suppliers/customers and a more cost effective and simpler solution could be developed by removing the dual MPAN option (for some or all customers) then we would strongly support further exploration of this option.</p>
7.	Do you believe there are any other solutions or options <sup>2</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes/ No	See above.

<sup>2</sup> The options currently being considered by the Group are described in detail in the Requirements Specification, which has been issued for Impact Assessment at the same time as this Initial Consultation.

Q	Question	Response	Rationale
8.	Are there any further comments on P213 that you wish to make?	Yes	Para 3.4 raises the question of why suppliers don't currently register more export sites. Clearly only suppliers are able to answer this question in detail. However, the Micropower Council's discussion with industry members suggests that there are a number of reasons that include both the defects that this Mod is trying to address and other difficulties, such as meter installation. We suggest that most of these other problems arise because of the relative newness of the industry and are resolvable and that the existence of other, resolvable difficulties, should not detract from efforts to address this particular and significant issue. We also understand that there are more customers with export meters than the 25 currently registered which suggests that the administration arrangements themselves are a major part of the problem.

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Lisa Smith</i>
<b>Company Name:</b>	<i>Siemens Energy Services</i>
<b>No. of BSC Parties Represented</b>	<i>0</i>
<b>Parties Represented</b>	<i>N/a</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>6</i>
<b>Non Parties represented</b>	<i>NHHDA, NHHDC, MO, MA, HHDC, HHDA</i>
<b>Role of Respondent</b>	<i>Party Agent</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes / No	N/a
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	N/a
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes / No	N/a
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	N/a
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	N/a

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	N/a
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes/ No	N/a
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		N/a
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	N/a
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	N/a
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes	The majority have been paid for by the Export Energy Supplier. Most are installed as a "check" meter alongside the Import Meter and the ownership has been passed to the customer. Meters have been installed without an Export MPAN with the supplier making "ad-hoc" arrangements for meter reading and payment for Export energy. More recent installations have been installed with two MPANs and formal meter operator/data collector processes in place.
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	Several hundred Export Meters have been installed. All meters are OFGEM Approved, are listed on Schedule 4 of the Meters (Certification) 1998 Regulations and are of a standard that could be used in Settlement.

Q	Question	Response	Rationale
6.	<p>Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)?</p> <p>Please give rationale.</p>	No	<p>The only case for a single MPAN is where Import and Export Registers are provided on a single Credit meter that has dual functionality. In addition, both Import and Export suppliers must be the same and Import and Export Meter Operators have also to be the same. Even if this minority situation is present, then the number of SSC codes will need to double to accommodate instances of with and without generation. This situation needs to exist for the duration of the Import/Export agreement. With a single MPAN approach there is a much higher chance that meter register functionality will be confused.</p> <p>If two different suppliers are involved then who is responsible for meter maintenance costs on a single meter, who pays for an end of life change, who is responsible for fault reconciliation of lost units? The use of Two MPANS for an Import and Export installation offers much greater flexibility of customer choice in appointing an Energy Supplier, and greater clarity of meter ownership. There is no need to double the number of SSC codes, increasing meter reading and billing accuracy. There may also be installations with Prepayment or twin element tariff requirements. A two MPAN approach ( Three in the case of a twin element installation ) more easily accommodates these arrangements.</p>
7.	<p>Do you believe there are any other solutions or options<sup>1</sup> that the Modification Group has not identified and that should be considered?</p> <p>Please give rationale.</p>	No	<p>All options have been considered. Registration has to be by MPAN and SSC code combination. The single and twin MPAN approaches have now been fully discussed.</p>

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<sup>1</sup> The options currently being considered by the Group are described in detail in the Requirements Specification, which has been issued for Impact Assessment at the same time as this Initial Consultation.

Q	Question	Response	Rationale
8.	Are there any further comments on P213 that you wish to make?	Yes	<p>Our preference is that the industry continues to use the existing arrangement for microgeneration sites (i.e. separate mpan for the import and export). This new proposal, while possibly simpler and more cost-effective for the Supplier, makes it more complex for the Meter Operator and Data Collector, due to the following:</p> <ul style="list-style-type: none"> <li>• The number of possible SSC codes would increase substantially.</li> <li>• In theory there would need to be a new SSC code for every possible combination of existing Import SSC with the existing 19 standalone export SSCs.</li> <li>• Our systems would have to support all of these new SSC codes, and Meter operations field staff would have to be instructed by the Supplier exactly which SSC to set the meter up as, and what physical meter type is required for this.</li> <li>• With such a large number of possible SSC codes to choose from, the potential for errors would increase. This would lead to a decline in data quality for these sites. Any problems under the new arrangements would affect import and export energy for these sites, because both are recorded on the same mpan.</li> </ul> <p>As already detailed, the number of SSC codes would need to double. One version for Import only, the second for Import/Export combined.</p> <p>P213 appears to have been drafted to solve some real and anticipated problems. If the modifications are adopted, our consideration is that there will be more scope for error, more SSC codes required, less flexibility for the customer to change Supplier/Meter Operator and an increase need for meter changes in the future. A much tidier and flexible arrangement is to register Import/Export sites with Two MPANS. Ownership of the meter and associated processes is clear, minimising meter registration errors, reducing billing errors and reducing the need for site visits.</p>

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<i>Rosie McGlynn</i>
<b>Company Name:</b>	<i>EDF Energy</i>
<b>No. of BSC Parties Represented</b>	9
<b>Parties Represented</b>	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc; EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power); EDF Energy (Cottam Power) Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; EDF Energy Customers Plc; Seaboard Energy Limited
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	0
<b>Non Parties represented</b>	N/A
<b>Role of Respondent</b>	Supplier/Generator/Trader/Distributor
<b>Does this response contain confidential information?</b>	

Q	Question	Response	Rationale
1.	Do you have any NHH Export sites? Please provide details.	Yes	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	We have around 200 customers on our small generators product.
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	The current processes are complex and the associated value is small. They require manual intervention which is not sustainable on a long term basis.

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	Either a fixed reward per annum or variable based on meter readings.
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	-	Until the solution is defined in more detail it is not possible to confirm whether we would start to record NHH Export in Settlement. If the solution delivered is one which can be easily accommodated by supplier systems and processes it is more likely that we would begin to follow this process.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	This is unclear as P213 has not developed sufficient detail to allow such a comparison to take place. In terms of cost / benefit the key areas the modification group should be seeking address are: <ul style="list-style-type: none"> <li>• Reducing process complexity</li> <li>• Interoperability</li> <li>• Impact on the Change of Supplier Process</li> </ul>
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes	Yes, we have installed meters for customers on a chargeable basis. The majority of customers on this product have paid for their export metering solution.
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	Approximately 200, all of which could be used in settlement.

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	There is no driver at present to make this process mandatory, by making the process as simple as possible participants will be more likely to use it.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	Yes	The modification group should be attempting to design a low cost, non complex approach which will be easy to administer while delivering the desired values into settlement. The solution the group deliver must not hinder the change of supplier process.

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Richard Harrison</i>
<b>Company Name:</b>	<i>Npower Limited</i>
<b>No. of BSC Parties Represented</b>	<i>10</i>
<b>Parties Represented</b>	<i>RWE Trading GmbH; RWE Npower Ltd; Npower Commercial Gas Ltd; Npower Cogen Trading Ltd; Npower Direct Ltd; Npower Ltd; Npower Northern Ltd; Npower Northern Supply Ltd; Npower Yorkshire Ltd; Npower Yorkshire Supply Ltd</i>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>None</i>
<b>Non Parties represented</b>	<i>N/A</i>
<b>Role of Respondent</b>	<i>Supplier / Generator / Trader / Consolidator / Exemptable Generator / Party Agent</i>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b> Error! Bookmark not defined.	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	(as Supplier)
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	

Q	Question	Response Error! Bookmark not defined.	Rationale
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	MPAN based charges (double); Problems getting additional MPANs from DNOs; Given the current small size of the domestic micro-generation market it has not yet been possible to make a business case for the system changes to support a full P81 solution.
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	Fixed sum or based on metered generation or non-Settlement export meter
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Maybe	This depends on the business case when the solution is fully defined and assessed. It would be worthwhile recovering the benefits through Settlement if the volumes were large enough to cover the costs of the systems development.
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		See answer to Q3
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	See answer to Q3
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	We are not in a position to answer this at present, because we do not believe existing charges are fully cost-reflective. Basic charges are per MPAN, but these might increase for import/export MPANs. Some transactional charges are by site visit. Meter Operator practice seems to be to install a separate meter for the exports, which must entail additional costs. It is not clear if this would change for P213.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	We note that this question is qualified by reference to the metering being paid for by the customer. In cases where we have installed metering as an Agent we do not know the commercial arrangement between the customer and the Supplier.
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	Although we have concerns about the viability of registering import and export to different Suppliers, we believe that the option of registering separate MPANs has to be catered for, even though this is likely to add extra cost and complexity.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes	Pending BSC/SVA systems re-procurement and the introduction of 'smart' metering, an alternative way of achieving the objectives of P213 may be via a simplified version of the P81 process, restricting the imports and exports to a single Supplier and allowing the 2 MPANs to be 'Related'.
8.	Are there any further comments on P213 that you wish to make?	Yes	If this market is to develop significantly it is important to have a solution which allows exports to be accounted for in Settlements without unnecessary costs and complexity. Pending the outcome of impact assessments it is not clear whether this proposal meets this criterion, since there may be significant impacts on a variety of Supplier processes including Settlement validation, pricing, demand forecasting, customer and data transfer and billing.

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<sup>1</sup> The options currently being considered by the Group are described in detail in the Requirements Specification, which has been issued for Impact Assessment at the same time as this Initial Consultation.

Procedure. Where requested this information can be treated as confidential, although all information will be provided to the Authority.

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

BSC Parties (“Parties”) and other interested parties are invited to respond to this consultation expressing their views or provide any further evidence on any of the matters contained within this document. In particular views are sought in respect of the following questions. Parties are invited to supply the rationale for their responses.

<b>Respondent:</b>	<b>Andrew Latham</b>
<b>Company Name:</b>	<b>Centrica</b>
<b>No. of BSC Parties Represented</b>	<b>9</b>
<b>Parties Represented</b>	<b>Accord Energy Ltd; British Gas Trading Ltd; Centrica Barry Ltd; Centrica Brigg Ltd; Centrica KL Ltd; Centrica KPS Ltd; Centrica PB Ltd; Centrica RPS Ltd; Centrica SHB Ltd</b>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	
<b>Non Parties represented</b>	
<b>Role of Respondent</b>	<b>Supplier</b>
<b>Does this response contain confidential information?</b>	<b>No</b>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	No	No
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	No
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	Currently we have not had customers requesting the use of Micro generation. However as you would expect we have had many customer enquiries around how to go about the use of Micro generation.

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	We have not had any customers however we would still use our Data collector to confirm readings or in the future the use of Smart Metering technology may also be utilised.
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes	We would support the use of registering a single MPAN under P213. It would be logical to use this information for settlement but again we would need to understand the impact: <ul style="list-style-type: none"> <li>• Cost on our systems</li> <li>• Cost for enhancements to Agents systems</li> <li>• and Elexons Costs for potential central system changes</li> </ul>
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		Centrica believes it has to be simple for a customer to use Micro generation and utilising one meter as apposed to two meters makes it easier for customers.
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	N/A
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	With an impact assessment of 2 weeks this is almost impossible to clarify and further time would be required. We have already identified areas that would be affected including pricing structures, changes to customer contracts, changes to bills, changes to IT infrastructure, training and development of front line staff, changes to DA, DC and MO contracts and data provisions. All of the above need further evaluation to give costs and we are not currently in that position.
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	N/A
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	N/A

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	It is correct that we should have 2 options available however as customers wish to change suppliers for different reasons, price, customer service, green tariff etc you may have difficulty in having a stranded meter asset if these are not intrinsically linked together. Therefore this needs to be considered b the working group.
7.	Do you believe there are any other solutions or options <sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	No	
8.	Are there any further comments on P213 that you wish to make?	Yes	<p>Comments on P213 Requirements Specification</p> <p>Section 1 BP7 - Would replace "two-register" with "multi-register".</p> <p>Section 1 BP8 Sent 3 - Would add "(s)" after "register" in both instances.</p> <p>Table 2.1.1 - As there will be a single fuse under the 2 MPAN solution are these classified as related MPANs? If so, it would be worth noting under the proposed new process that the MPANs would now need to be allocated a 'related' MTC.</p> <p>Table 2.1.1 - No mention of PC allocation for either process.</p> <p>Table 2.1.1.5 - No mention made of different reading provided by MO to DC. Under the current process it would be an initial reading for the Export meter, under the proposed process it would be a final reading for the old configuration and an Initial reading for the new configuration.</p> <p>Table 2.1.2.7 - As there will be a single fuse under the 2 MPAN solution are these classified as related MPANs? If so, it we be worth noting under the proposed new process that the MPANs would now need to be allocated a 'non-related' MTC.</p> <p>Table 2.1.2 - No mention of PC allocation for the process.</p> <p>Table 2.1.2 - Again no mention of readings</p> <p>Table 2.2.1 - comments as per 2.1.2</p> <p>Table 2.2.2 - No mention of difference for Old Supplier re CoS readings.</p>

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Q	Question	Response	Rationale
9.			<p>Table 2.2.3 Text - I would be worth noting that this is effectively a reconfiguration by the existing supplier from E/I to E or I and a new connection for the new supplier.</p> <p>2.3.1 MDDM 2 - For consistency I think it would be better for all TRPs should have an import/export flag against them rather than just those with X type SSCs.</p> <p>2.3.1.1.B1 - Just a new valid valid but this will need to be used when; requesting a meter to be installed (select correct SSC TYpe), CoS Gain to determine tariff (import/export/both).</p> <p>2.3.1.1B2 - Flag will need to be added to all registers noit just those with an X SSC Type, otherwise process will become more complex.</p> <p>2.3.1.1B3 - Agree SVAA need to know this but it could be included in a new high level group at the end of the flow that other parties could ignore if they wanted to.</p> <p>2.3.1.1.Bi - As MDD will need to be updated to include the new SSC type and TPR indicator (import/export) and parties will need to identify these in various processes, adding a new group to cover substitution could simply be ignore by those parties that do not</p> <p>2.3.1.1.Bii - This does not seem logical as the D0280 is a teleswitched metering related flow.</p> <p>2.3.1.1.Biii - If the mapping data is not included in the require it. D0269/70 (option Bi) then a new flow makes more sense than including it in an unrelated flow (Option Bii).</p> <p>2.3.1.1.C - This states only 1 change is required under 2.3.1, surely there are 2, 1 is the new SSC Type (import/Export) and the other is the Import/Export flag against the TRP.</p>
10.			<p>Section 3 - I would see this more as an additional rather alternative modification as it is not designed to replace the options listed in sections 1 &amp; 2.</p> <p>Section 3 options 1, 2 &amp; 3 - As LDSOs use LLFCs to indicate things like what service they provide for a metering point (MAP, MAM, both) then it would make sense to me for this information to be visible in at least the DUoS report (D0030).</p>

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Name</i> <b>Paul Pitchford</b>
<b>Company Name:</b>	<b>AccuRead Limited</b>
<b>No. of BSC Parties Represented</b>	<b>0</b>
<b>Parties Represented</b>	<i>Please list all BSC Party names of Parties responding on behalf of (including the respondent company if relevant).</i> <b>None</b>
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<b>3</b>
<b>Non Parties represented</b>	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i> <b>AccuRead NHHDC, AccuRead NHHDA, SWAE NHHDA</b>
<b>Role of Respondent</b>	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / Distributors / other – please state <sup>1</sup>)</i> <b>Party Agent</b>
<b>Does this response contain confidential information?</b>	

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	Yes / No	N/A

<sup>1</sup> Delete as appropriate – please do not use knockout, this is to make it easier to analyse the responses

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	N/A
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	N/A
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	N/A
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Yes/ No	N/A
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.		N/A
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	N/A
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	N/A
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	No	N/A
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	N/A

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	Yes	From a NHHDC and NHHDA point of view the single mpan and 2 mpan options both already work so having P213 as optional will not cause any problems. However it is always clear what is going on if there is only one process.
7.	Do you believe there are any other solutions or options <sup>2</sup> that the Modification Group has not identified and that should be considered? Please give rationale.	Yes/ No	
8.	Are there any further comments on P213 that you wish to make?	Yes	With the current process the Import and Export mpans can have different Profile Classes, P213 will require only one PC for the mpan and hence the same profile class for the import and export registers. It may be possible to work around this by using different SSCs, eg different SSCs for different export profile classes.

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## P213 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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<b>Respondent:</b>	<i>Chris Carberry</i>
<b>Company Name:</b>	<i>Scottish Power Plc</i>
<b>No. of BSC Parties Represented</b>	<i>4</i>
<b>Parties Represented</b>	Scottish Power UK plc, ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd
<b>No. of Non BSC Parties Represented (e.g. Agents)</b>	<i>2</i>
<b>Non Parties represented</b>	SP Dataserve UK Ltd
<b>Role of Respondent</b>	Supplier/Generator/ Trader / Party Agent
<b>Does this response contain confidential information?</b>	<i>No</i>

<b>Q</b>	<b>Question</b>	<b>Response</b>	<b>Rationale</b>
1.	Do you have any NHH Export sites? Please provide details.	Yes	We have a very small number of import customers that also have an export capability. We have, at present not traded any within the settlement arrangements.
1a.	If yes to question 1, how many NHH Export sites do you have and how much energy do these individual sites Export (e.g. kWhs per year)?	-	We have not, at present traded any NHH export energy within the Settlement arrangements.
2.	Do you use the current arrangements (introduced by P081) to register Export MPANs in Settlement?	No	Not at present, but if we were to trade NHH export sites then we would utilise P81. Then again what other method is there?
2a.	If yes to question 2, how easy do you find the current process to use? Please explain any problems that you consider to exist with the current process.	-	
2b.	Of no to question 2, why don't you use these processes? Please provide rationale.	-	Solely because we have not traded any NHH export energy within the Settlement arrangements. We do not use any other method.

Q	Question	Response	Rationale
2c.	If no to question 2, as a Supplier, how do you treat your NHH Export sites (e.g. do you pay a fixed reward to customers with microgeneration, or do you use readings provided by the customer using their own metering)?	-	Whatever we do in terms of an offering to our customers is out with the scope of the BSC. We should not fall into a trap of devising a means of trading NHH export within Settlements as a function of how we bill them.
3.	If it was possible to register Import and Export under a single MPAN for microgeneration sites (as suggested by P213), would you start to record NHH Export in Settlement? Please provide rationale.	Qualified Yes	<p>Scottish Power is supportive of the principle of trading both import and export on a single MPAN. This would reduce the likelihood of data inconsistencies and erroneous transfers, while simultaneously improving the clarity and quality of service to the customer.</p> <p>However as it presently stands P213 is not acceptable to Scottish Power and cannot be supported. As it presently stands the Mod would introduce an unacceptably high level of error into Settlements.</p> <p>However, this should only be implemented where the quality of data within Settlements can be assured. Scottish Power would like the group to explain how we would overcome the issues of data quality, LLF's and Profiling.</p> <p>Scottish Power has concerns on the ability of market participants to introduce significant amounts of error into Settlements without first being properly validated. The obligations in validating Import/Export metered consumption needs to be clearly defined on the basis of some robust analysis.</p> <p>There already exists a lack of consistency over the methodology used to calculate LLF's and this again would need to be reviewed as microgeneration proliferates. Much of the electricity produced in this way will not travel great distances and without any review the level of recorded losses in any GSP could be erroneously reduced. As such we would want a guarantee that LLF's for microgeneration sites would be reviewed and that they would only apply to the import register, if at all.</p> <p>Given the entirely variable nature of the elements required for microgeneration Scottish Power cannot comprehend any acceptable way of profiling the import or export usage for these sites. Before Scottish Power could accept P213 the Mod Group must demonstrate how the quality of data in Settlements would not be detrimentally affected by profiling.</p>

Q	Question	Response	Rationale
3a.	If yes, why would you use P213 opposed to the current processes? Please provide rationale.	As above	As per the comments above Scottish Power would not use P213 as it presently stands but would utilise a single MPAN option if we were satisfied that the quality of data within settlements would not be detrimentally affected.
3b.	If no, why wouldn't you use these processes? Please provide rationale.	-	
4.	As a Supplier, how much would the costs of administering each NHH Import and Export sites be reduced by P213? Please provide indicative monetary values per customer or their level of significance to you and the rationale for this.	-	<p>Scottish Power advises the Mod group not to use cost as a driver for this change. It is highly dubious that an accurate cost benefit analysis could be presented to the industry while the numbers it would be based on would render any such analysis as inappropriate.</p> <p>However we have enough experience of customer types with two MPANs on the same premises that demonstrate a greater level of cost and data inconsistencies than single MPAN set-ups.</p> <p>Despite this, as the Mod presently stands the net outcome could well be more costly as we would have to account for the increased likelihood of error within settlements, the management and controls of this error and the movement in losses and Group Correction Factor.</p>
5.	As a Meter Operator Agent, have you installed any NHH Export metering paid for by the customer?	Yes/No	It is not clear whom you are referring to when you state 'customer'. We have not provided metering on a commercial basis to domestic customers, however we have provided such meters to Suppliers on request.
5a.	If yes, how many Export meters have you installed and are the meters of a standard that could be used in settlement (if they were registered to a Supplier)?	-	All meters provided by Dataserve are compliant for use within the Settlement arrangements.

Q	Question	Response	Rationale
6.	Do you believe that the new P213 process should be optional (so that Suppliers can still register Import/Export sites using 2 separate MPANs)? Please give rationale.	No	Suppliers should in principle be free to choose the method they feel is the most efficient for their customers. However we should be aware that by making any change optional Suppliers will in effect have to devise systems and processes to support both types. Otherwise customers will be potentially disadvantaged via a lack of choice when contemplating a change of Supplier and Suppliers would be denied the opportunity to provide such a service. As such we would urge the group to ensure the most efficient outcome is reached.

Q	Question	Response	Rationale
7.	<p>Do you believe there are any other solutions or options<sup>1</sup> that the Modification Group has not identified and that should be considered? Please give rationale.</p>	Yes	<p>As alluded to in question 3 Scottish Power is supportive of the principle of trading both import and export on a single MPAN, however we believe the proposed Mod would introduce an unacceptable level of error.</p> <p>The present EAC/AA formula's would not be appropriate for these customers on either the import or export registers. It is inconceivable that there could be an acceptable method of profiling such customers that would not result in a significant level of error. The Mod also does not provide enough assurance on how reads from such sites would be validated. Any over-recording of export consumption would result in a change in Group Correction Factor that would benefit the non-compliant party while disadvantaging others. What measures should we take to avoid this? There is also no evidence that LLF's would accurately reflect the actual losses relating to such sites.</p> <p>Given the above concerns Scottish Power suggests the following:</p> <ul style="list-style-type: none"> <li>• To overcome the issues of the level of estimation used in NHH settlements and the use of profiling, readings for export sites should be submitted in HH format. Readings for both registers would be taken every 30 mins however the data retriever would not necessarily need to dial the meter each day. This could be implemented by the use of Smart or AMR metering and could in fact be a driving force for the use of this technology.</li> <li>• The cost of this may be slightly higher than the present Mod in terms of changes to systems and the provision of metering, but it would avoid the disproportionate cost of managing data inconsistencies and disgruntled customers.</li> <li>• The appropriateness of LLF's for export sites should also be investigated. However given that such sites are exporting energy to the network as well as importing from it there is a strong argument that the overall level of losses could in fact be zero.</li> </ul>

Q	Question	Response	Rationale
8.	Are there any further comments on P213 that you wish to make?	Yes	<p>Scottish Power understands the reasons for introducing such a change but would urge to Mod Group to ensure what they are doing is in the best interest of Settlements and ultimately for customers.</p> <p>At present the Mod suffers from a complete lack of evidence, failing to prove that the proposed solution would work effectively when considering all industry processes. Too much seems to be based on generalities and not enough on specific examples and robust analysis. Scottish Power urges the group to walkthrough these processes detailing the impact and considering what changes may be required.</p> <p>We would not welcome a change unless it was robust and enduring.</p>

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