

P213 - Collated Party and Party Agent Impact Assessment Responses

PARTY AND PARTY AGENT RESPONSES			
Please provide responses to the following questions:			
<ol style="list-style-type: none"> 1. Would the Proposed Modification, as outlined in section 1 and 2 of the attached Requirement Specification for Modification Proposal P213, impact your organisation? Yes / No* 2. If yes, please provide a description of the impact, any costs incurred, and the implementation timescales¹ required for options (a), (b.i), (b.ii), (b.iii) and (c). 3. Would the potential Alternative Modification, as outlined in section 3 and 4 of the attached Requirement Specification for Modification Proposal P213, impact your organisation? Yes / No* 4. If yes, please provide a description of the impact, any costs incurred, and the implementation timescales¹ required for options 1, 2 and 3. 5. Any other comments: 			
Company		Impact?	Additional Information
Accuread	Proposed Impact	Y	Yes, but only if the MDD flows changed b.i only – about 6 months.
	Alternative Impact	Y	The same impact as Proposed Modification (1) As [described in response to question] 2
	Comments		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
British Energy	Proposed Impact	Y	We expect the costs of the proposed modification, as outlined in section 1 and 2, to be high. This will have an impact on our current processes and would require significant system changes. We anticipate that any system changes will take at least 12 months.

¹ The time required should be the time needed between the approval of the redline text to Code Subsidiary Documents (CSDs) by the appropriate Panel Committee and the implementation date of P213.

Generation Ltd, British Energy Generation (UK) Ltd, British Energy Power & Energy Trading Ltd, British Energy Direct Ltd, Eggborough Power Ltd	Alternative Impact	Y	We expect the costs of the proposed modification, as outlined in section 3 and 4, to be high. This will have a significant impact on our current processes and would require major system changes as a result of the changes to the DTC and flows. We anticipate that any system changes will take at least 12 months.
	Comments		Please note that the response to question 2 and 3 above are estimates and, without a thorough review, we cannot commit to completing any system changes within 12 months and this may take longer.
Scottish & Southern Energy PLC	Proposed Impact	Y	
	Alternative Impact	Y	
	Comments		-
United Utilities	Proposed Impact	Y	
	Alternative Impact	Y	
	Comments		6 months implementation timescale. Costs unknown at present. Processes and procedures would need to be revised.
Npower Ltd	Proposed Impact	Y	<u>Possible Impacts</u> Initial assessment suggests that there would have to be changes to various internal systems, which would have

		<p>to be supported by process changes. Further detail on these is outlined below although this is not an exhaustive list and more detailed analysis would be necessary to understand how extensive such changes would ultimately be.</p> <p>It is likely that changes to support import and export with different load curves, for forecasts based upon standard load curves, on the same MPAN in the same half hour, would be required.</p> <p>System changes would be needed in MOA systems to validate that each SSC has two settlement TPRs recorded and that each one is identified as either being Import or Export and having correct Measurement Quantities.</p> <p>Revised Register Conventions will also need to be considered for both combined Import and Export registered meters and WP140 would have to be updated to reflect this.</p> <p>It would involve changes to job booking systems to ensure the correct job type is raised and validated, should a new job booking type be required.</p> <p>Changes to metering systems would be required to load exclusive Export SSC and combined Import / Export SSC, which will need new deprogramming logic via new job work types to allow the appropriate register data to be captured and uploaded into MOA with the correct register IDs, Measurement Quantity ID and TPR combinations. Additional validation relating to dual Import/Export measurements within one MPAN would also have to be considered.</p> <p>Initial analysis indicates that we would prefer the data used in the substitution table to be included in the MDD data flows received by participants as described in section 2.3.1.1 (b). This would keep MDD as the single master of SSC data and ensure transparency. Changes to accommodate this will be required to the validation of MDD in all systems that receive these flows. Meter Reading validation scripts and associated procedures may need altering too.</p> <p><u>Implementation Timescales required and costs:</u></p> <p>We are not in a position to answer this at present as we feel there is insufficient detail to undertake a full analysis of potential impact to systems and hence we are unable to quote for costs for the impacts.</p>
Alternative Impact	Y	Similar to those described above.
Comments		2.2.3 'Change of Supplier Process (Import or Export)'. If the customer requests a CoS on either the import or export, and the single meter remains in place, how would the D0010 be populated i.e. would each Supplier be

			<p>able to see the readings for the other Supplier's MPAN?</p> <p>Where Supplier 'A' has registered a singular MPAN under P213 conditions and there is a subsequent CoS to Supplier 'B', can it be confirmed that Supplier 'B' will be obliged to maintain that MPAN as P213 where there is still a need for both Import and Export. MOA's would want to avoid any possibility of another Supplier wishing to revert to 'P81' thus forcing the process of either a logical removal of a meter/register from the MPAN and then having to share the meter across a newly registered export MPAN. Obviously there will be occasions as stated where the export requirements may no longer be needed, however we need to avoid swapping and changing unnecessarily.</p> <p>A Supplier would have to use the same NHHMO and NHHDC for the import and export registers if they were the Supplier to both elements of the single MPAN, and the read frequencies for import and export registers would need to be the same. There may be situations where a Supplier may want to have different agent arrangements or read frequencies for the import and the export registers.</p> <p>Note:</p> <p>As an observation to Annex 2 in the modification proposal, the example shows SSC 0482 with Profile Class of '8'. My understanding is that 0482 was declared for profile class 1. Profile Class 8 should have a SSC of 0489. Is this simply an error in the example?</p> <p>Would it be permissible to have 2 meters, one import and one export with just a single MPAN, or is this solution implying that a single meter, regardless of the number of registers, is a pre-requisite for the 1 MPAN solution.</p>
PTCMOA	Proposed Impact	N	
	Alternative Impact	N	
	Comments		-
Imserv Europe Ltd (UKDC NHHDC/D A/MO)	Proposed Impact	N	
	Alternative Impact	N	
	Comments		-

United Utilities - Distribution	Proposed Impact		
	Alternative Impact		
	Comments		As discussed we haven't been able to complete a detailed impact assessment on this due to staff absence. Initial assessment has revealed that we could be impacted in a number of areas. We would be grateful if you could put this on record for the next modification group meeting and we will complete and return our detailed impact assessment next week.
Central Networks (EMEB and MIDE MPIDs)	Proposed Impact	Y	See comments.
	Alternative Impact	Y	See comments.
	Comments		<p>Whilst it is appreciated the P81 does not present an entirely robust solution to the day-to-day management of export customers, it does nevertheless offer a working solution that we have already invested significant time and IS resource into implementing. We do not feel that P213 is a viable alternative at this time as it presents no benefit over P81 to us as the LDSO given the low volume of export currently generated by micropower sites.</p> <p>The implementation of P213 will cost us a minimum of 65 man days to implement system and process changes, and training for system users and field staff. We would require in excess of 18 months to implement these changes given existing projects which are already underway. We are also concerned about the timing given the advent of Elexon's Project Isis which is going to involve the re-structuring to MDDM and the associated repetition of the above work.</p> <p>Given that we are not supportive P213, should the industry collectively support the proposals we would want to be party to discussions on the structure and implementation of any changes.</p>
E.ON UK Energy Services	Proposed Impact	Y	(a) no impact, (b.i) Amendments would be required to systems in order to ignore the Substitution table Data, (b.ii), none (b.iii) none and (c) none.
	Alternative Impact	Y	We would require the usual timescales associated with an upgrade to the centrally provided NHHDA systems.

	Comments		-
E.ON UK	Proposed Impact		-
	Alternative Impact		-
	Comments	<p><u>P213 Impact Assessment Consultation response</u></p> <p>Please find attached our responses to the impact assessment questionnaire in response to the above consultation. I have also included an annexe document which I believe outlines some of the scenarios where there are probable process failures in the two separate MPAN solution under P81 which would be resolved by this modification.</p> <p>With regard to the Registration of NHH Export – the consultation has possibly over simplified the rationale for why suppliers are choosing not register sites in settlement – citing the current arrangements as being too complex and that the cost of metering is a factor in supplier’s decisions. The creation and registration of a second export MPAN in itself is quite simple. Similarly metering costs can be reduced by the use of a combined import and export meter and by renegotiation of the commercial arrangements; yet evidenced by the number of sites currently registered suggests that there are other barriers that are not so easily overcome.</p> <p>One of our concerns is that there is no relationship between the two MPANs and that once a change of supplier or tenancy event occurs there are real problems with visibility of the export capability by the import supplier. Our analysis of the problems likely to be encountered once these change events have happened is attached. We previously tried to address these concerns with a simple modification to the MRA which “Related the MPAN by reason of export”, which could be unlinked at the request of the customer who desired to have two separate suppliers. This modification had no BSC implication and yet failed as suppliers saw this only as an interim measure and that in itself relating the MPANs was insufficient to remove the barriers to settling export.</p> <p>The costs in managing the second MPAN as a separate record and the metering and distribution costs associated with that MPAN completely erode any value in the export reward propositions and will not improve the number of sites being registered. This is likely to introduce errors into settlement in the future when the number of generators increases as the government continues to put its micro-generation strategy more and more into the public arena.</p> <p>In addition, we believe that in the main customers will choose to have one supplier in the case where their main driver for installing the microgenerator is the avoided import costs and where export reward is seen as an added bonus. In those cases we would wish to ensure that the customer can receive that reward at minimal cost. We</p>	

		believe the group should consider the option of mandating a single MPAN solution based on scale or size of generator installed.
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The following table was provided by E.ON as part of their response:

Activity	Scenario	Problem
Change of Supplier	Supplier wishes to take Import and Export MPAN	Objection raised to Import MPAN, as there is no relationship to Export MPAN the Import MPAN will be stranded
	Customer moves import supply to a new supplier - new Import supplier arranges a change of meter without knowledge of export functionality	Export MPAN metering may be removed and will leave Export supplier with costs of reinstalling metering
	New Supplier is for import supply only, but erroneously transfers export supply	Old supplier may not wish to re-register export MPAN as they are no longer in a contract with the householder, new supplier becomes responsible for MPAN he had no intention/ capability to support
	Customer moves supply to a new supplier and is offered an ex-gratia style non settled tariff	Old supplier is left with a stranded MPAN and the costs associated with that and a new provider is in a contract for the export reward leaving the old supplier without contract and paying charges
	Old Export Supplier wishes to disconnect MPAN after loss of supply where new supplier does not register the export MPAN in settlements	Distribution businesses do not want to disconnect the MPAN where they can foresee a future use for the MPAN, so old supplier is left with charges for a MPAN and no mechanism to recover
	Export MPAN not disconnected by DNO, losing supplier is not in a contract with the customer and so cannot settle the export	Meter reading history will become "patchy" as there will be no agent appointed to collect readings if MPAN remains live in DNO systems Old supplier is forced to be responsible for a site where they no longer have a customer relationship
Shared metering systems	Two MOPS appointed	Where the meter is found to be faulty – the meter may be exchanged without reference to the other party. In the case of a metered, but not settled export offering there will be no ability to identify who the other supplier involved is.
Change of Tenancy	Co-incident with COS	In the case of a micro CHP boiler, the customer may not be aware of the presence of the generator so will make choices about contracts and metering requirements based on an import only scenario