

Responses from P183 Assessment Consultation

Consultation Issued 01 February 2005

Representations were received from the following parties

No	Company	File number	No BSC Parties Represented	No Non-Parties Represented
1.	Scottish and Southern Energy	P183_AR_001	5	0
2.	Siemens Energy Services	P183_AR_002	0	1
3.	IMServ	P183_AR_003	0	2
4.	EDF Energy	P183_AR_004	9	0
5.	E.ON UK	P183_AR_005	15	0
6.	British Gas Trading	P183_AR_006	1	0
7.	RWE NPower	P183_AR_007	10	0
8.	AccuRead	P183_AR_008	0	1
9.	British Energy	P183_AR_009	5	0
10.	BizzEnergy	P183_AR_010	1	0
11.	Scottish Power	P183_AR_011	6	0
12.	Gaz De France	P183_AR_012	1	0
13.	Metering Services (MIDE/NORW)	P183_AR_013	0	1

P183 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.

Respondent:	<i>Scottish and Southern Energy</i>
No. of Parties Represented	<i>5</i>
Parties Represented	<i>This response is sent on behalf of Scottish and Southern Energy, Southern Electric, Keadby Generation Ltd., Medway Power Ltd., and SSE Energy Supply Ltd.</i>
No. of Non Parties Represented	<i>0</i>
Non Parties represented	
Role of Respondent	<i>Supplier / Generator/ Trader / Party Agent / LDSO</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes	Could help improve the quality of data into settlements. We assume the DC will classify this reading as D (Deemed or Estimated) in the D0086 should he elect to use the old Supplier reading.
2.	Do you agree with the Group’s provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	Yes	There is currently no prescribed method for Supplier estimating. Any attempt to create a standard would have to have a strong business case. It is entirely at the new suppliers choice as to whether they use the old supplier’s estimate and therefore the responsibility for the CoS reading is unchanged.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Yes	<p>Provided we had sufficient valid history we would provide an estimate to the new supplier. We see this as providing assistance in the Settlement process as well as potentially reducing the number of disputed reads on CoS. As the new supplier we would normally pass the Old Supplier estimate to the new NHHDC where we had no better reading to offer.</p>
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	Yes	<p>If it clear that the customer reading is invalid (eg customer has read the gas meter) then the supplier should not be obligated to pass the reading to the NHHDC.</p>
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	Yes	<p>It is sensible to send only one reading type. If a valid customer read has not been obtained then it should be left to the discretion of the new supplier as to whether he submits the old supplier estimate, any point of sale reading he might have collected or no reading at all.</p>
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes / No	<p>In practice Suppliers tend to submit a reading at the last moment, not sure it needs to be mandated.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	Yes	The obligations and procedures mentioned provide adequate safeguards in providing valid data for the supplier to use.
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes	However do not believe that a new meter read type is required.
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	Helps facilitate competition.
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	No	

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Please send your responses by **12:00 midday on Thursday 10 February 2005** to modification.consultations@elxon.co.uk and please entitle your email 'P183 **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 Richard Hall on 020 7380 4033, email address richard.hall@elxon.co.uk.

P183 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS

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Respondent:	<i>Siemens Energys Services Ltd.</i>
No. of Parties Represented	
Parties Represented	<i>SIEM, EELC, EMEB</i>
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	<i>Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes	Provided that the recommended checks are carried out there is no extra risk of an inaccurate read entering settlement
2.	Do you agree with the Group’s provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	No	Readings previously calculated by supplier were used for billing only and did not get into settlement. Allowing a reading to be derived from an uncontrolled source and allowing this reading into settlement will create inconsistency between supplier readings and an increased likelihood of validation failures

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Not a Supplier	
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	Yes	The code currently obliges suppliers to send even readings which are obviously incorrect this creates unnecessary work
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	Yes	Using a POS read would require fundamental changes to facilitate getting this reading into settlement, sending more than one read type on D0071 would lead to unnecessary complication, therefore option 2 is preferable
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes	Adequate time should be given for the existing processes to work, in addition a supplier should provide either an estimate or a CoR not both because their differing sources and close proximity in time is likely to cause conflict between these two reads

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	Yes	The current validation process deals with CoRs and there is no reason why old supplier estimates will provide any additional difficulties to CoRs
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes	
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	The proposal will result in improvements to the CoS process which will in turn better facilitate objective C (Promoting effective competition.....etc)
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	No	

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Respondent:	<i>Stuart Scott (NHH Data Quality Manager)</i>
No. of Parties Represented	<i>2</i>
Parties Represented	<i>NHHDC and NHHDA</i>
No. of Non Parties Represented	<i>0</i>
Non Parties represented	<i>N/A</i>
Role of Respondent	<i>Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
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Q	Question	Response Error! Bookmark not defined.	Rationale
1.	<p>Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading?</p> <p>Please give rationale.</p>	NO	<p>IMServ are sceptical that allowing the old supplier to use estimated CoS readings will improve the efficiency of the CoS process.</p> <p>The deemed read process at SSD +8 is designed to ensure that an appropriate CoS reading is generated on the basis of the read history provided by the old supplier and the old NHHDC. If these reads are accurate and are agreed by both the NHHDC and the old supplier, it should not matter which party estimates a CoS reading as the reading values should be very similar with both parties using the same last valid reading. Therefore, it should be the NHHDC that generates the CoS reading using the last EAC and thus the estimation has the least effect on upsetting settlements.</p> <p>Only a small percentage of CoS readings enter the disputed reads process and are therefore subject to the agreed read process. This suggests that generally the quality of the deemed readings from NHHDCs is correct and acceptable to both old and new suppliers.</p> <p>It is only usually in cases where the old supplier and its NHHDC disagree on the read history that the deemed read generated by the new NHHDC is incorrect and will be disputed at a later date. This scenario usually occurs when the supplier has chosen to use reads for billing and the NHHDC has not used the same reads for settlement (or the other way around). This means that, when the NHHDC deems a reading, it will be out of line with the supplier's expectation. Even if an old supplier estimate was used on these occasions, the likelihood of this read passing pool validation by the new NHHDC is low, removing the reason for the old supplier sending an estimate.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
			<p>IMServ do agree though that there is one scenario whereby allowing the old supplier to estimate a CoS reading would be of definite benefit and this is where the MPAN has not been read for a long time and thus deeming forward over a long period, thus making the deemed reading less accurate.</p> <p>Overall, we believe that this change could make matters worse for the new NHHDC and lead to more disputed CoS readings and queries from the supplier to the NHHDC complaining about why the supplier estimate was not used as the CoS reading.</p> <p>We also believe that this will encourage new suppliers not to ask for actual reads on CoS as they will rely on gaining estimate reads from old suppliers.</p>
2.	<p>Do you agree with the Group’s provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.</p>	NO	Any estimation routine should be in line with the settlement history else the chances of the NHHDC validating the O read would be low.
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Not a Supplier	N/A

Q	Question	Response Error! Bookmark not defined.	Rationale
4.	Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.	NO	Suppliers should send all readings to the NHHDC so that they can be validated for settlement purposes.
5.	The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.	NO	See comments in sections 1 and 4.
6.	Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.	YES	
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	YES	Our only concern is that if this suggestion is given the go-ahead this could lead to an increase in the level of queries between supplier and NHHDC on why the estimated reads have not been used as the CoS readings.
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	NO	As these are only estimate reads, they are not actual reads.

Q	Question	Response Error! Bookmark not defined.	Rationale
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	NO	We think this will generate more queries and confusion between suppliers and NHHDCs than the benefits it brings.
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	NO	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	YES	Our only concern is that if this suggestion is formally agreed, P183 could lead to an increase if the level of queries between supplier and NHHDC on why the estimated reads have not been used as the CoS readings.

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Respondent:	EDF Energy
No. of Parties Represented	9
Parties Represented	EDF Energy Networks (EPN) plc; EDF Energy Networks (LPN) plc EDF Energy Networks (SPN) plc; EDF Energy (Sutton Bridge Power) Jade Power Generation Ltd; EDF Energy (West Burton Power) Ltd; EDF Energy plc; London Energy plc; Seaboard Energy Limited
No. of Non Parties Represented	0
Non Parties represented	<i>N/A</i>
Role of Respondent	Supplier / Generator / Trader

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes	With the proviso that such readings have been validated and precedence shows that these can only be used in the absence of any other valid readings. In such situations this would seem to provide a reading that is more useful than one that is deemed by a NHHDC.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	<p>Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier?</p> <p>Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.</p>	Yes	Suppliers already have routines that they believe are effective so would not wish to make potentially costly changes. Given that this reading also has to be validated by NHHDC then any "poor" estimates will not be used. If a Supplier finds that this is the case then it must be a commercial decision for that Supplier on how they wish to resolve such estimation issues.
3.	<p><i>This question should only be answered by Suppliers:</i></p> <p>In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Yes	We believe that this adds a further option that can be used to reduce deemed reads on CoS. This should hopefully lead to a reduction in disputed reads, which would provide benefits to the customer and Suppliers involved.
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed?</p> <p>Please give rationale.</p>	Yes	The types of readings that could be sent have been extended. In cases where a New Supplier has a customer own read and has validated this against an old Supplier estimate they really want the customer own read to be used. In this case sending the customer own read only is all would be needed. This is particularly the case under current reading precedence rules. It is likely that any old Supplier estimated read will be dated for their end date. With a customer own read this could be any time within the reading window. In such cases if the customer own read is valid then we would want to use this and because of the precedence rules this might not happen. With this in mind if this rule is not removed then it is imperative that this precedence rules in BSCP 504 are amended, as suggested below.

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.	Yes	See answer to question 4.
6.	Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.	No	Not sure why this is needed if the New Supplier is certain that no further readings will be received then they should not artificially have to wait before sending the flow. For example, if they receive customers own read on SSD and have validated this they should be able to send it straight away. It lessens the option of flow being received too late and gives time to sort out any flow rejections by NHHDC.
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	No	This response is based on our reading that precedence rules in BSCP 504 are classed as part of NHHDC validation rules. However, if this were not the case then our response would be yes. This is because we feel that current precedence rules would value an old Supplier estimated read, probably dated SSD-1 as more appropriate than a NHHDC validated CoR reading which is dated more than one day away from SSD. We do not see this as being appropriate and why we are suggesting a change to precedence rules, see question 11.
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes	If a settlement adjustment is required post agreement of a SAR. In such a situation settlements can then be adjusted to better reflect the actual positions of both Suppliers.
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	With the issues raised above resolved we would agree that this better facilitates competition on supply, thereby better facilitating BSC objective (c).

Q	Question	Response Error! Bookmark not defined.	Rationale
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	No	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	Yes	<p>1. We feel that precedence rules in BSCP 504 need to be amended as part of this work as follows:</p> <ul style="list-style-type: none"> a. All valid actual (remote, MOA, NHHDC, Customer Own and Old Supplier Estimated) readings are potential candidates for the CoS reading, provided they are read within SSD ± 5 days. b. If the first reading after SSD is a Final read then this read must be used, irrespective of any other reads available. c. If there are multiple reads then precedence is; remote reading, MOA Final, NHHDC actual, Customer Own then Old Supplier estimated read. d. If two reads of same type fall equally either side of SSD, then the +SSD read is used. <p>With this rule set there is an increased chance that a CoR will be utilised as a CoS reading, reducing number of customer disputes. Given that a CoR must also pass validation, then it should also be an acceptable settlement reading for all parties.</p> <p>2. There is an indication within this consultation that will include the option of sending a POS read as a valid CoS reading. We do not believe that this is a reading that should be included as a potential valid reading. Our concerns on this have been returned to customer transfer programme and are reproduced below:</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
			<p>We are rejecting this solution due to use of Point of Sale (POS) reading within this solution. We do not feel that this reading should be passed in any circumstances to a DC. To introduce such functionality would require more widespread changes to industry documents, such as BSCP 504, and to DC systems to enable such a read to be introduced.</p> <p>Part of the justification for making this change to be sent to NHHDCs is flawed. Supporting documentation states that this might allow the NHHDC to use the POS reading as the history until data is received from old NHHDC Agent. A reading on its own is not sufficient to be used as history by the new NHHDC Agent, as a meter reading is only part of the historic data that is transmitted. In order to load historic data you would also require data items such as the EAC, the Profile Class and other data items received on the D0152 flow. This data is required in order to send data to the EAC/AA calculator to deem a CoS meter reading, without this no CoS reading can be deemed (as is stated in footnote 36 in BSCP 504).</p> <p>Therefore a POS reading itself would not be able to be used by the new NHHDC Agent until historic data had been received from the previous NHHDC Agent, at which point it effectively becomes superfluous. Therefore receipt of a POS reading not only causes problems for an NHHDC Agent in terms of processing the flow and creating data which it does not pass into settlements, but it actually serves no purpose in terms of generating a D0086.</p> <p>3. Modification indicates that a Supplier sends a validated CoR read.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
			<p>Problem with this is what do we mean by valid. If this is settlement type validation then a Supplier will not be in position to carry out such validation and therefore a CoR read could never be sent. Also as a new Supplier it could be that no other read is available to validate against apart from the CoR read. Although CTP processes should minimise this with new flow giving old Supplier reading data there is no obligation or this to be used. Therefore, if the validation being considered is against these reads then as there is no obligation to use then again no validation of this read can be carried out. As such we would prefer an option that says "send the CoR read, validated by Supplier if they have data available to validate that reading". Although we would still need to define what we mean by valid.</p>

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Respondent:	<i>Alexandra Crump</i>
No. of Parties Represented	<i>15</i>
Parties Represented	E.ON UK plc; Powergen Retail Ltd; Citigen (London) Ltd; Cottam Development Centre Ltd; Enizade Ltd; E.ON UK Drakelow Ltd; E.ON UK High Marnham Ltd; E.ON UK Ironbridge Ltd; Midlands Gas Ltd; Ownlabel Energy Ltd; Severn Trent Energy Ltd; TXU Europe (AHG) Ltd; TXU Europe (AHGD) Ltd; TXU Europe (AH Online) Ltd; Western Gas Ltd.
No. of Non Parties Represented	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	Supplier / Generator

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	YES	By allowing the OSER to be utilised as a CoS read the robustness of the CoS process will be enhanced for both the customer and for Settlement purposes while potentially reducing the volume of Disputed Reads. Using the OSER will contribute to improvements in timeliness as there will be less of a requirement to deem a read. In addition as the OSER will go through standard validation by the DC concerns regarding any potential negative impact on Data Quality entering Settlement are alleviated – OSER’s failing validation will be rejected and therefore not entered into Settlement. Use of an OSER increases the chance of the D86 reading being acceptable and thus reduces the risk of incurring the operational cost associated with the Disputed Reads process, while maintaining the principle that reads going into Settlement satisfy DC validation.

Q	Question	Response Error! Bookmark not defined.	Rationale
2.	<p>Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier?</p> <p>Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.</p>	YES	<p>The mechanism for generating the OSER should NOT be prescribed and should be left to the discretion of the Old Supplier as each Supplier will have its own methodologies derived from their unique systems. To attempt to prescribe the generation of the OSER would be impractical.</p> <p>In addition if the methodology to calculate the OSER was mandated there would be additional costs to Suppliers in developing the functionality – costs which are unlikely to be realised by any increase in the benefits of prescribes estimation</p>
3.	<p><i>This question should only be answered by Suppliers:</i></p> <p>In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	YES	<ul style="list-style-type: none"> • We would exercise an OPTION to provide an estimated meter read to the New Supplier where such activity could be undertaken but would not support a mandatory requirement for such action. • We would take up the option to validate and submit an estimated reading to the New NHHDC in CoS circumstances - but would stress that the validation protocols cannot be prescribed as per comments submitted in Response 2 above.
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed?</p> <p>Please give rationale.</p>	YES	<p>Submitting 'out of tolerance' reads to the NHHDC due to existing obligations is not contributing to the overall accuracy of Settlement. If a Customers Own Read fails the Suppliers internal validation processes there should be no obligation to submit such data as this could lead to a degradation of data quality within Settlement.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	YES	<p>Submitting a single read via the D71 to the NHHDC which has been validated by the Supplier is satisfactory – as there is always the option to send a second D71 flow if required.</p>
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	YES	<p>As a COR could be received by the New Supplier before SSD+5 which would take precedence.</p>
7.	<p>Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.</p>	YES	<p>Current NHHDC validation processes and MRA Disputes procedures are determined to be appropriate safeguards to ensure the integrity of OSER's. We have identified no valid reasons for these existing procedures to be revised or amended.</p>
8.	<p>Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?</p>	YES	<p>By amending the definition of Metered Data in 4.2.1 of the Code to include an 'agreed read' the process for the entry of a SAR into Settlement by the NHHDC will be brought into line with BSCP504 and MAP08. This amendment provides an additional safeguard to the CoS mechanism in the event that the suggested new CoS read is incorrect and in maintaining the validity of data entering Settlement.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	YES	BSC Objective (c) – ‘promoting effective competition ...’ will be better facilitated by P183 issues being addresses by reinforcing the robustness of the CoS process BSC Objective (d) – ‘promoting efficiency in the implementation ...’ will be better facilitated as improvements in the quality of data entering Settlement will enhance the overall efficiency with which the BSC is administered
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	NO	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	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 midday on Thursday 10 February 2005** to modification.consultations@elexon.co.uk and please entitle your email ‘P183 **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 Richard Hall on 020 7380 4033, email address richard.hall@elexon.co.uk.

P183 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.

Respondent:	<i>Claire Walsh</i>
No. of Parties Represented	
Parties Represented	<i>BGT</i>
No. of Non Parties Represented	
Non Parties represented	
Role of Respondent	<i>Supplier</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes	We support the proposal for an OSER to be utilised as a COS reading, providing for a timely split in the old and new Supplier’s Settlement liabilities and enabling Customer billing to commence. The use of the OSER will also increase the acceptability of the D86 reading through the DC validation procedures.
2.	Do you agree with the Group’s provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	Yes	Logistically, an algorithm for the calculation of an OSER cannot and should not be mandated due to the (acceptable) differences in Supplier systems and estimation routines. However, where the losing Supplier has not had a valid D10 for a defined period, has not billed the customer or has had ownership of the MPAN for a defined short period of time, that Supplier should be excluded from providing an OSER as it would have no robust basis to calculate an accurate OSER.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Yes	Should the Modification be made and the associated MRA CP's be approved, on our loss, we will provide the new Supplier with an OSER where it can be calculated, and on our gain, we will validate and submit acceptable OSER Meter readings to the new NHHDC. The paper does not reference how the new Supplier can validate the OSER and suggest that VASMG discuss this during the Assessment procedure.
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	Yes	Where multiple actual readings are available during the CoS process, the obligation to submit all actual readings to the NHHDC should be removed. This should be limited to the CoS process only.
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	Yes	
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes	Existing processes and timescales should be allowed to complete within the SSD +/- 5 WD's BEFORE the provision of an OSER becomes an allowable circumstance. This is to support the current (preferred) mechanism during the CoS process for the provision of an actual reading in the first instance.

Q	Question	Response Error! Bookmark not defined.	Rationale
7.	<p>Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.</p>	Yes	<p>The continuation of the NHHDC validation algorithms will maintain the integrity of controlled Settlement data submissions. The continuation of the Disputed read process (MRA MAP 08) will enable the new Supplier to dispute, challenge and correct any erroneous CoS OSER's, in line with the current procedure. We believe that an additional element of assurance is required and that monitoring the types of reading being utilised during the CoS process should be introduced i.e. OSER's should only be utilised where current processes fail within the SSD +/- 5 WD window. Reporting would monitor Supplier activity at CoS.</p>
8.	<p>Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?</p>	Yes	<p>Yes, but believe the OSER should have a new and separate read type assigned to enable the monitoring in question 7 to be fulfilled.</p>
9.	<p>Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	Yes	<p>We support the rationale put forward by the VASMG within the consultation.</p>
10.	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale</p>	No	

Q	Question	Response Error! Bookmark not defined.	Rationale
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	Yes	<p>Aligned with current CTP principles, this facility should be mandated for the domestic market and optional for the non-domestic market. This is in line with the associated CTP change process under Industry IA.</p> <p>The documentation does not reference PPM's and believe that the VASMG should discuss the requirements for this metering type during the assessment phase.</p> <p>It is important that the VASMG has input from the NHHDC's to assess the implementation timescales following their IA of system changes.</p> <p>It should be noted that if Mod P176 and P183 are successfully determined by the authority, Mod P183 will reduce the propensity for deeming on CoS. Following the Modification determinations and CP approval processes for the CTP backstop, P176 & P183 changes, we would recommend that a joint ELEXON & MRASCo working group is convened to overlay the interactive processes and agree the associated timescales.</p>

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 midday on Thursday 10 February 2005** to modification.consultations@elexon.co.uk and please entitle your email 'P183 **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 Richard Hall on 020 7380 4033, email address richard.hall@elexon.co.uk.

P183 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.

Respondent:	<i>Louisa Stuart-Smith</i>
No. of Parties Represented	<i>10</i>
Parties Represented	<i>RWE Trading GmbH, RWE Npower plc, Npower Co-gen Ltd, Npower Co-gen Trading Ltd, Npower Direct Ltd, Npower Ltd, Npower Northern Ltd, Npower Northern Supply Ltd, Npower Yorkshire Ltd, Npower Yorkshire Supply Ltd</i>
No. of Non Parties Represented	<i>N/a</i>
Non Parties represented	<i>N/a</i>
Role of Respondent	<i>Supplier/Generator/ Trader / Consolidator / Exemptable Generator / Party Agent</i>

Q	Question	Response	Rationale
		Error! Bookmark not defined.	

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
1.	<p>Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading?</p> <p>Please give rationale.</p>	Qualified Yes	<p>We have no objection to the transfer of the old Suppliers estimated reading to the new Supplier which could then be used to populate the D0071 on CoS provided that it is used last in the order of precedence and is subject to robust DC validation.</p> <p>We do however, question the value of this read as it is likely to provide no more additional information for CoS than the DC will have if it has received the metering system historical data from the previous DC. If the DC is in a position to validate an OSER it will be doing so using the information it will have received in the D0152 from the old DC. The data in the D0152 could reflect the data that the old Supplier will use to generate the OSER. If the new DC has the D0152 then the deemed read it would produce on SSD+8 is likely to be the same as the OSER.</p> <p>The information in the D0152 itself could be unreliable. The data in the D0152 is dependent on the old Supplier having passed any readings it has obtained from the customer to its DC and that the old Supplier actually uses the readings it has received from its DC in deriving the OSER (process undefined). If this is not the case, the likelihood is that they will differ significantly and the new Supplier will not know which is more likely to be right - and hence be able to 'agree' the OSER - unless it has an actual CoS reading (DC read or COR) and/or PoS reading. If the new Supplier has a CoS read, presumably this should be used rather than the OSER.</p> <p>If no D0152 or Meter Technical Details have been received from the previous DC then it is unlikely that the new DC will be able to either validate the D0071 or deem a read. In these cases the OSER could be valuable as a backstop read.</p> <p>In principle, there is no problem with using a reading however derived, provided it is reasonably close to reality. However, using a Supplier estimate (process unspecified) is a new innovation with potential risks to Settlement data quality and future billing and CoS processes. Given that the OSER needs to be validated against something (either OS DC history or CoS read from New Supplier), it is hard to see why this is necessary or justifiable.</p> <p style="text-align: right;">© ELEXON Limited 2005</p>

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
2.	<p>Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier?</p> <p>Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.</p>	Qualified Yes	<p>We believe with the Groups provisional view that the basis of the OSER should be left to the discretion of Suppliers.</p> <p>Prescribing a process for producing an OSER would take time and money for Suppliers to implement for potentially little gain. As the OSER is last in the order of precedence it will only be used on the D0071 in addition to other reads or where no other read exists. The number of CoS relying on the OSER is likely to be small and would not justify an expensive estimation process.</p> <p>However, whilst it might not be worth developing a sophisticated process for producing an OSER it could be worth considering setting basic rules to ensure any OSER produced is at least based on two previous actual reads.</p>
3.	<p><i>This question should only be answered by Suppliers:</i></p> <p>In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Yes	<ul style="list-style-type: none"> ▪ If mandated npower would provide an OSER to the new Supplier on CoS. ▪ npower's response to the recent related MRA preassessment form supported a variant of Option 3 involving the submission of all available reads to the DC in the D0071 including the OSER. Validation of these reads would be the responsibility of the DC.

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
4.	Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.	No	We believe that we do not have enough information to carry out effective validation on the reads and feel this is best carried out by the accredited DC validation processes.
5.	The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.	No	See previous responses to 3 & 4. npower supports Option 3 involving sending all available reads on the D0071
6.	Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.	No	Option 3 allows all reads obtained to be sent to the DC for validation. A supplier should be able to send the D0071 when it is fully populated. However, it might be worth setting rules which do not allow a OSER to be sent on it's own in the D0071 prior to SSD+5

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
7.	<p>Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.</p>	Yes	<p>Agree – The existing validation procedures (and any future clarification of procedures which come into effect if P176 is approved) should stop poor estimates from going into Settlements.</p> <p>The disputes process provides a safety net should any spurious data enter settlement and need to be backed out.</p>
8.	<p>Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?</p>	Yes	<p>SARs should be recognised as Metered Data by the Code subject to them passing DC validation and business rules that both Suppliers have agreed on.</p>
9.	<p>Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)</p>	Qualified Yes	<p>Whilst we do not think that the OSER necessarily provides any extra information than would already have been available to the DC if it has received the D0152, the OSER does provide the new supplier with information that could be useful in the disputes process and could, if accurate, provide a wider picture for future customer billing.</p>
10.	<p>Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale</p>	No	

Q	Question	Response Error! Bookmark not defined.	Rationale
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	Yes	Providing additional mechanisms for obtaining CoS reads does not ensure that the customer transfer process is improved because if the new DC does not have a D0152 from the previous DC it will still not be able to validate any of the information (including the OSER) it receives from its Supplier in the D0071. This issue can only be addressed if a more robust process is put in place to ensure the successful transfer of metering system EAC/AA historical data between DCs on CoA/CoS.

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PLEASE RETURN BY 12.00 on Thursday 10 February 2004

To: ELEXON Modifications

4th Floor

350 Euston Road

LONDON

NW1 3AW

Tel: 020 7380 4364

Fax: 020 7380 4360

Email: modifications@elexon.co.uk

CPC00487: Detailed Level Impact Assessment of P183

Please provide responses to the following questions:

1. What impact, if any, would the Proposed Modification have on your organisation?

It would require software development and changes to procedure.

2. What implementation timescale would you require to make the changes associated with the Proposed Modification?; and

First estimates indicate at least six months from notification date.

3. If this Modification is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents)'.

It is applicable.

4. Any other comments:

Consultation Question 1

We agree with this proposal as this method is already being used for Objection to CoS reads but have concerns as to the overall benefit. The Supplier Agreed Read still needs to be put into settlement which requires the old and new NHHDC to exchange flows / history etc.

Consultation Question 2

We agree with this proposal as this method is already being used. However, we do have general concerns as to the general lack of control this proposal implies.

Consultation Question 3

As an NHHDC agent this question has no relevance to us.

Consultation Question 4

We agree with this proposal as there can be useless reads sent through that both suppliers and NHHDC agents are aware of that we still have to go through the process of failing etc.

Consultation Question 5

We agree with this proposal, if supplier would like to send more than one customer read through then there is nothing stopping them sending more than one D0071. Changing the set up to allow a lot of reads on one D0071 would require extraneous process / system changes.

Consultation Question 6

We agree with this proposal as we would appreciate the opportunity to process an actual Change of Supply read before the D0071 customer read is processed.

Consultation Question 7

We agree with this proposal that current (NHHDC) validation should be applied to old supplier estimates as well as all reads NHHDC is going to potentially pass into settlements.

Consultation Question 8

We have no opinion either way on this proposal.

Consultation Question 9

We do not believe that P183 better facilitates the BSC objectives, our rationale for this conclusion relate strongly to our answer to Consultation Question 1. (The Supplier Agreed Read still needs to be put into settlement which requires the old and new NHHDC to exchange flows / history etc.) The process described still requires history to be received from the old NHHDC so that the supplier estimated read can be validated before a D0086 can be sent out. Once we have reached the point where this is successful any other CoS readings, including deemed readings, would be processed anyway.

Consultation Question 10

We do not believe that there are any alternative solutions that P183 has left out.

Consultation Question 11

We do not believe that there are any other issues that have been raised by P183.

Name: Paul Pitchford_____

BCA/PACA/CID Owner* _____

Organisation: AccuRead Ltd_____

Date: 10-Feb-2005_____

*Please delete as appropriate

P183 ASSESSMENT PROCEDURE CONSULTATION QUESTIONS - ADDITIONAL MECHANISMS FOR OBTAINING A VALID CHANGE OF SUPPLIER READ

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.

Respondent:	<i>Martin Mate</i>
No. of Parties Represented	<i>5</i>
Parties Represented	<i>British Energy Power & Energy Trading Ltd, British Energy Generation Ltd, Eggborough Power Ltd, British Energy Generation (UK) Ltd, British Energy Direct Ltd</i>
No. of Non Parties Represented	<i>-</i>
Non Parties represented	<i>-</i>
Role of Respondent	<i>Supplier/Generator/Trader/Consolidator/Exemptable Generator/Party Agent</i>

Q	Question	Response	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	No	We have limited confidence in a supplier's estimate, whether the method for generating it is prescribed or otherwise. On the other hand the DC, in accordance with BSCP 504, uses a much more sophisticated method for generating a deemed read. With regard to the submission of an old supplier estimate, what is effectively a 3wd submission window is not practical given the time taken to consider generating a flow, send a flow, receive a flow, submit the read and have the read processed by the DC.
2.	Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	No	The merit of having an old supplier estimate would be to effectively speed up the CoS process. If there is no assurance that an estimate has been generated in a controlled and accurate manner then there is more chance of variation in the quality of estimates provided. Also see answer to question 1

Q	Question	Response	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	No	<p>We would not be likely to either generate or submit estimates. This is because we have greater confidence in the processes, experience and the overall accuracy that DCs provide.</p> <p>Also see answer to question 1</p>
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	No	<p>Reducing the number of readings being passed to the DC for validation and submission to settlements does not make sense. Such a relaxation can only reduce the chance of achieving greater accuracy in settlements.</p>
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	N/A	
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	No	<p>Firstly the DC is able to determine which of a number of D0071s is most appropriate. Secondly, Suppliers should be capable of determining which of a number of reads is most appropriate and thirdly, as mentioned in the assessment consultation, natural disincentives already exist for the use of the old supplier estimate.</p>

Q	Question	Response	Rationale
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	Yes	
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	No	Metered Data constitutes a direct/physical/actual meter reading (BSC S-2, 4.2.1 'automatic/remote means, site meter reading or customer reading'), not an estimate. This is particularly an issue if the method for generating such an estimate is not prescribed.
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	P183 would not promote any real improvement in efficiency or competition, instead it would be a cost to all parties.
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	As opposed to using an old supplier estimate there would be more worth in receiving an old supplier's last actual meter reading (please see Document 4 of the CTP's Electricity Change Pack for a similar proposal). Although this could not be used as an alternative CoS read it would support the generation of a more accurate proposed read if and when a dispute is raised on a D0300.
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	No	The consideration of P183 is an indication that there is general dissatisfaction with the processes used by the DC to estimate readings and validate candidate readings on CoS. Therefore, it would be more appropriate and productive to review these processes rather than concentrating on developing an alternative that would not necessarily improve supplier's or DC's operations.

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.

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P183 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.

Respondent:	<i>Alison Hughes</i>
No. of Parties Represented	<i>1</i>
Parties Represented	<i>BizzEnergy.</i>
No. of Non Parties Represented	
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>Supplier</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes / No	Yes –reduces the potential for discrepancy between closing bill from old supplier and opening bill from new supplier.
2.	Do you agree with the Group’s provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	Yes / No	Yes –provided that checks are in place. This is a fallback and is only submitted for validation if considered acceptable to new supplier.

Q	Question	Response Error! Bookmark not defined.	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Yes / No / Not a Supplier	Yes –we would take this option and hope that other suppliers would too in cases where there is very limited actual data.
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	Yes / No	Agree with the points raised in the consultation.
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	Yes / No	Yes, agree that there should be no requirement for the supplier to submit customer reads which are known to be invalid.
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes / No	<p>Agree that old supplier estimates are a fallback and should not take precedence over actuals and the role of the data collector. A time-constraint sounds sensible.</p> <p>As a new supplier we can wait a lot longer than SSD+8 for a deemed read from the new NHHDC if the deemed process fails. It is these instances we are interested in resolving.</p>

Q	Question	Response Error! Bookmark not defined.	Rationale
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	Yes / No	Yes
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes / No	yes
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes / No	Yes –should make it easier to effect a change of supply.
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes / No	
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	Yes / 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 midday on Thursday 10 February 2005** to modification.consultations@elxon.co.uk and please entitle your email 'P183 **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 Richard Hall on 020 7380 4033, email address richard.hall@elxon.co.uk.

P183 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.

Respondent:	James Nixon
No. of Parties Represented	6
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i> Scottish Power UK plc; ScottishPower Energy Management Ltd.; ScottishPower Generation Ltd; ScottishPower Energy Retail Ltd.; SP Transmission Ltd; SP Manweb plc.
No. of Non Parties Represented	0
Non Parties represented	<i>Please list all non Parties responding on behalf of (including the respondent company if relevant).</i>
Role of Respondent	<i>(Supplier/Generator/ Trader / Consolidator / Exemptable Generator / BSC Agent / Party Agent / other – please state ¹)</i> Supplier / Generator / Trader / Consolidator / Exemptable Generator

Q	Question	Response ¹	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	Yes	Where the New Supplier offers the Old an estimate as a candidate CoS Read, it implies the agreement of both to its use for customer billing and settlement purposes. It should also increase the likelihood of the D0086 reading satisfying DC validation and reduce the risk and costs associated with the read being disputed.

¹ Delete as appropriate – please do not use strikeout, this is to make it easier to analyse the responses

Q	Question	Response ¹	Rationale
2.	<p>Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier?</p> <p>Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.</p>	Yes	<p>ScottishPower agrees with the Mod Group that the basis of the Old Supplier's estimate should not be prescribed. The estimation rules and procedures are at the heart of each Supplier's billing system and it would inevitably attract significant costs if these were to be changed. Moreover, perhaps, it would probably take a very long time for the industry to agree the new rules to be applied.</p> <p>Suppliers already depend on the quality of their own estimates during normal operations, so those techniques currently in place should be sufficient to guarantee that an appropriate level of quality is maintained.</p>

Q	Question	Response ¹	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Both	<p>ScottishPower does not consider this an either and/or scenario. In accordance with feedback from pre-assessment on CTP Proposals to date, the Old Supplier will be mandated to send a new flow through the DTN providing "Notification of Current Supplier Information".</p> <p>While the mandate will only apply to domestic sites, the option to apply it to those in Profile Classes 3 and 4 will be available.</p> <p>The data items within the flow, one being the Old Supplier's estimated meter read for the date the site was lost, will be populated conditional to the Old Supplier having established a 'Billable' account for their customer at that site. As a 'last resort', ScottishPower will look to take up the option to send the Old Supplier estimated meter reading as its candidate CoS Meter Reading.</p> <p>The 'last resort' will take effect where no valid* reading was captured from the site or provided by the customer in the read window, or no early reading was captured, for instance at the point of sale. (Note that valid in this context is where the New Supplier may conclude that a customer's own read is invalid as compared to an early read captured and the Old Supplier estimate).</p>
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	Yes	<p>ScottishPower concurs with the Mod Group that mandating the submission of suspected erroneous data is not considered sensible, as it may unreasonably distort the Settlement.</p>

Q	Question	Response ¹	Rationale
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	Yes	<p>In ScottishPower's view the New Supplier, as its chosen preference, should offer only one read. This will be evaluated against any other reading available at the time to the New Supplier and sent by order of precedence.</p> <p>This leaves the decision making with the party who will be billing the customer and who will be required, albeit in conjunction with the Old Supplier, to resolve any subsequent dispute against the reading value, should one arise.</p>
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes	<p>New Suppliers are obliged to exhaust all reasonable endeavours to capture a meter reading within the Opening Meter Read Window before offering any other alternative. ScottishPower, therefore, supports the principle that actual reading should be collected where possible and that Old Supplier Estimated Readings or Early (Point of Sale) Readings should only be offered by the New Supplier between SSD +5 and SSD +8.</p>
7.	<p>Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.</p>	Yes	<p>ScottishPower takes the view that it is not in the best interests of the Old Supplier to offer 'poor' estimates, which merely increase the likelihood of it being rejected by the DC or disputed by the New Supplier and/or the customer.</p> <p>On this basis ScottishPower accepts that the existing NHHDC validation obligations should be applied to all reads offered in conjunction with the CoS event by the New Supplier, on the realisation that any read, regardless of type, could be subject to subsequent dispute.</p>

Q	Question	Response ¹	Rationale
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes	<p>ScottishPower believes it to be essential that SARs are recognised as Metered Data, as they represent information agreed between the Old and New Suppliers, in conjunction with the customer. They are also the intended output from the current operational MRA MAP08 process.</p> <p>ScottishPower, therefore, takes the view that any reading upon which agreement has been reached between all of these parties should then constitute satisfactory Settlement data.</p> <p>These comments are in line with those previously submitted by ScottishPower in the context of the disputes process amendments and the D0300 changes (see also comments under question 11).</p>
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	Yes	<p>P183 affords Suppliers greater scope to improve the quality of meter readings and, therefore, the accuracy of Settlements. Recognising the SAR as Metered Data will serve to more closely align Supplier Billing with Settlements.</p> <p>Both dimensions contribute towards objective (c) as defined in the Transmission Licence.</p>
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	<p>While supportive of these changes, ScottishPower also believes that an opportunity to improve the reconciliation of settlements is being missed, as the proposals do not go far enough.</p> <p>As the D0300 is to be made a true DTN flow, it is proposed that this should hold precedence in determining the read values to be included in the subsequent D0086. This makes sense as agreement must have been reached between both the Suppliers and the customers on these values.</p> <p>A challenge surely must then be made to governance that entitles a DC to reject (as stated in MAP08) any readings through being "unwilling or unable" to process them. Currently, where the DC rejects or fails to process the readings in a D0300, the Settlement and Supplier misalignment</p>

Q	Question	Response ¹	Rationale
			is simply perpetuated. [NB: - These comments are equally attributable to instances where the backstop process would be used to fill in for missing flows, or where an initial D0086 has been subject to dispute and the Suppliers / customer have subsequently agreed an alternative reading for CoS].
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	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 midday on Thursday 10 February 2005** to modification.consultations@elexon.co.uk and please entitle your email 'P183 **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 Richard Hall on 020 7380 4033, email address richard.hall@elexon.co.uk.

To: ELEXON Modifications

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CPC00487: Detailed Level Impact Assessment of P183

Please provide responses to the following questions:

1. What impact, if any, would the Proposed Modification have on your organisation? **See responses to consultation questions on the next sheet**
2. What implementation timescale would you require to make the changes associated with the Proposed Modification?; and **None**
3. If this Modification is not applicable to your organisation, please indicate why (e.g. proposed changes do not apply to Party Agents)'.
None
4. Any other comments:

Name: John Schofield on behalf of Barbara Vest

BCA/PACA/CID Owner* _____

Organisation: Gaz de France ESS

Date: 10 February 2005

*Please delete as appropriate

Consultation Question 1

Do you agree that an old Supplier estimated reading should be allowed as a CoS Meter Reading? **YES**

As a reading of last resort, the accuracy of a supplier provided estimate is likely to be more accurate than a NHHDC deemed read. A supplier is more likely to consider abnormal consumption profiles than the relatively crude NHHDC estimation process.

Consultation Question 2

Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? **YES**

Supplier algorithms/methodologies will be well entrenched in systems and could even be considered proprietary knowledge, probably used in routine estimation for billing purposes. As stated, changes to a prescribed method may be costly.

Consultation Question 3

In practice, would you be likely to either:

- 1) provide an estimated Meter reading to the new Supplier in CoS circumstance where losing an NHH SVA Customer; and/or
- 2) validate and submit an estimated Meter reading to the new NHHDC in CoS circumstance where gaining an NHH SVA Customer?

We think the central point here is a lack of definition of the mechanism to be used in passing the reading. Is it D0010, a D0086 the normal meter reading dataflows, a D0071, or something by bi-lateral agreement? Item 2 is on a D0071, but for item 1 to use the same methods, the allowable routing of the flows would need to change. On the bi-lateral front, there is a current mechanism for providing DCs with information about readings failing DC validation and used in billing or vice versa, but these are rarely used. This proposal could end up the same way.

So to answer the questions:

- 1) **YES**. The old supplier has better access to historic information allowing production of a CoS estimate;
- 2) **NO**, The new supplier is not in a good position to validate the estimated reading provided by the old supplier. If this reading were to be used it would be more appropriate that the old supplier provide it directly to the new NHHDC, or merely act as a postbox. Irrespective it would be more acceptable if all such communications was by dataflows.

Consultation Question 4

Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of CoS should be removed? **NO**

We believe that having more information available to the NHHDC may complicate their processing but is more likely to provide an accurate usable reading.

Consultation Question 5

The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071 (Customer Own Reading on CoS). This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If it is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? **NO**

The same reasoning as Question 4.

Consultation Question 6

Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? **YES**

Seems reasonable. As stated the read type is of the lowest priority and other higher precedence reads should be submitted before this date.

Consultation Question 7

Do you agree that the continuation of the (unchanged) existing NHHDC validation obligations and MRA meter read dispute procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? **YES**

In other words the normal CoS disputed reads process is unchanged, continuing current safeguards.

Consultation Question 8

Do you believe that SARs should be recognised as Metered Data by the Code? **YES**

The reading will have been agreed with the customer(s) because of their payment of bills. A customer's interests, particularly the new customer, will be more focused on accuracy because of the cost to them than any regulations about applicability of readings for settlement. However, it is probable that some reasons for customers changing supplier is perceived poor supplier performance stemming from failures to obtain good readings over a long time period. In this case the SAR reading is likely to be of poor quality, but may be the only available reading. Re-emphasising the need to obtain other recognised readings – but not these or NHHDC Deemed readings – would be appropriate.

Consultation Question 9

Do you believe that P183 better facilitates the achievement of the Applicable BSC Objectives? **NO**

The BSC Objectives are too high level to judge whether P183 would have an effect. Any new market entrant is already swamped by regulations, guidelines and working practices. This is a minor element in that quagmire. Also it is optional and of last resort.

Consultation Question 10

Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? **No**

P183 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.

Respondent:	<i>Ian Henderson</i>
No. of Parties Represented	
Parties Represented	<i>Please list all Parties responding on behalf of (including the respondent company if relevant).</i>
No. of Non Parties Represented	<i>4</i>
Non Parties represented	<i>MIDE NHHDC, MIDE NHHDA, NORW NHHDC, NORW NHHDA</i>
Role of Respondent	<i>Party Agent</i>

Q	Question	Response Error! Bookmark not defined.	Rationale
1.	Do you agree that an old Supplier estimated Meter reading should be allowed as a CoS Meter reading? Please give rationale.	No	Supplier estimates do not use DPCs and so are not compliant to current BSC regulations. The industry is currently spending a significant amount of money to aid NHHDCs in addressing issues surrounding the methods used for deeming.
2.	Do you agree with the Group's provisional view that the basis of the old Supplier estimate should not be prescribed, but should instead be left open to the discretion of the old Supplier? Please give rationale. If you disagree and believe that the basis of the old Supplier estimate should be prescribed, please detail how it should be calculated.	Yes / No	No Comment

Q	Question	Response <small>Error! Bookmark not defined.</small>	Rationale
3.	<p><i>This question should only be answered by Suppliers:</i> In practice, would you be likely to either:</p> <ul style="list-style-type: none"> • Provide an estimated Meter reading to the new Supplier in CoS circumstances where losing an NHH SVA Customer; and/or • Validate and submit an estimated Meter reading to the new NHHDC in CoS circumstances where gaining an NHH SVA Customer? <p>Please give a rationale for your opinion.</p>	Not a Supplier	
4.	<p>Do you believe that the current Code obligation on a new Supplier to provide all SVA Customer own readings to the NHHDC at the time of a CoS should be removed? Please give rationale.</p>	No	All readings can be used to help validate future readings and increase the accuracy of settlements
5.	<p>The Group's preference is that only one read type should be submitted to the new NHHDC on the D0071. This would be a Supplier validated SVA Customer own reading, selected by proximity to SSD, where this is available. If this is not available, an old Supplier's estimated Meter reading (again, where available) would be an acceptable alternative. Do you agree with this approach? Please give rationale.</p>	No	<p>We agree that the COR closest to the CoS event should be populated in the D0071.</p> <p>Old Supplier Estimates should not be carried in D0071s.</p> <p>They will not decrease the amount of time taken to output a D0086 or increase the accuracy of settlements.</p>
6.	<p>Do you agree that new Suppliers should be prevented from providing an old Supplier estimate to the new NHHDC before SSD+5? Please give rationale.</p>	Yes	

Q	Question	Response Error! Bookmark not defined.	Rationale
7.	Do you agree that the continuation of (unchanged) existing NHHDC validation obligations and MRA meter read disputes procedures are appropriate safeguards to ensure the integrity of old Supplier estimates? Please give rationale for your opinion. If you believe further assurance techniques are required then please outline what these should be.	Yes	
8.	Do you believe that SARs should also be recognised as Metered Data by the Code? Please give rationale for your opinion?	Yes / No	What is a SAR?
9.	Do you believe Proposed Modification P183 better facilitates the achievement of the Applicable BSC Objectives? Please give rationale and state objective(s)	No	An extra source of CoS readings will not speed up the CoS process. All required data will still be needed before the D0086 can be output. Settlements may be compromised as non-compliant estimated (deemed) readings will be used to settle on.
10.	Do you believe there are any alternative solutions that the Modification Group has not identified and that should be considered? Please give rationale	Yes	The root cause of delayed CoS events (ie transfer of MRH/MTD) should be addressed.
11.	Does P183 raise any issues that you believe have not been identified so far and that should be progressed as part of the Assessment Procedure / are there any further comments on P183 that you wish to make? Please give rationale	No	

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