

# Report Phase Consultation Responses



## P339 'Introduction of new Consumption Component Classes for Measurement Classes E-G'

This Report Phase Consultation was issued on 11 November 2016, with responses invited by 28 November 2016.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Npower Group plc	1/6	Supplier, HHDC, HHDA, HHMOA NHHDC, NHHDA, NHHMOA
OVO Energy	1/0	Supplier
Power Data Associates Ltd	0/1	Meter Administrator
Salient Systems Ltd	0/1	HHDC/DA Software Solutions provider
ScottishPower	1/1	Supplier, HHDC
SmartestEnergy	1/0	Supplier
SP Distribution / SP Manweb	1/0	Distributor
SSE Energy Supply Limited	1/0	Supplier
Stark	0/4	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management Ltd	0/4	HHDC, HHDA, NHHDC, NHHDA
Western Power Distribution	1/0	Distributor

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P339 should be approved?

## Summary

Yes	No	Neutral/No Comment	Other
11	0	0	0

## Responses

Respondent	Response	Rationale
Npower Group plc	Yes	[None]
OVO Energy		<p>We agree with the Panel's initial unanimous recommendation that P339 should be approved as it better facilitates Applicable BSC Objectives (c) and (d) with the reasoning outlined below:</p> <ul style="list-style-type: none"> <li>Objective (c) - Elective HH Settlement will open up the potential for innovative new products in the domestic retail market thus increasing competition. This Proposed Modification will remove barriers to an elective HH Settlement market and thus facilitates this BSC objective.</li> <li>Objective (d) - This Proposed Modification creates the facility for microgeneration sites to be settled without the need for large volumes of site specific HH data to be passed between Parties.</li> </ul>
Power Data Associates Ltd	Yes	I agree with the proposers view that it enable innovative products to enter the market and more accurately allocates costs/benefits to the appropriate parties rather than smeared across the market.
Salient Systems Ltd	Yes	Proactive Suppliers who are committed to embracing change and delivering new and innovative products to market will take advantage of the enablers delivered through P339 adoption and in doing so will better address BSC objectives c, d.
ScottishPower	Yes	Agree
SmartestEnergy	Yes	[None]
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Yes	In our view P339 primarily better facilitates objective (c). In line with other proposals that support the Elective HHS market, there is a clear case that it will promote innovate tariffs and thus

Respondent	Response	Rationale
		improved supply competition.
Stark	Yes	Agree with the Proposer's views with reference to BSC Objectives.
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	[None]

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P339?

### Summary

Yes	No	Neutral/No Comment	Other
9	0	2	0

### Responses

Respondent	Response	Rationale
Npower Group plc	Yes	Yes, but only if the BSC changes enable the splitting of the P210 file for National Grid. Is this the case?
OVO Energy	Yes	[None]
Power Data Associates Ltd	[No response]	[None]
Salient Systems Ltd	Yes	[None]
ScottishPower	Yes	Agree
SmartestEnergy	No comment	[None]
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Yes	[None]
Stark	Yes	[None]
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	[None]

## Question 3: Do you agree with the Panel's recommended Implementation Date?

### Summary

Yes	No	Neutral/No Comment	Other
10	0	1	0

### Responses

Respondent	Response	Rationale
Npower Group plc	Yes	If April 17 is the intended implementation date for P339. This is dependant BSC mod for the implementation of a CUSC mod CMP266.
OVO Energy	Yes	We agree with the Panel's recommended Implementation Date of 1 April 2017. The primary benefit of implementing this proposal by this date is that it removes a potential barrier to the progression of the CUSC modification CMP 266. CMP 266 proposes to remove a key barrier to elective HH Settlement for smaller sites by eradicating the potential for TNUoS to be charged twice for sites who electively settle HH.
Power Data Associates Ltd	Yes	The report indicates some change that the vast majority of parties are able to complete in the timescale identified.
Salient Systems Ltd	Yes	<p>HHDA systems MUST change in order to accommodate the requirements attached to P339. The changes required at HHDA systems are non-complex and additionally provide more clarity and consistency at the reference data model that will drive delivery of data aggregations at HHDA. The work required to deliver P339 at HHDA systems will predominantly implicate the testing time required to confirm the integrity of configuration data change and possible limited code change. The implementation of P339 at HHDA systems by the proposed implementation date will be comfortably achieved.</p> <p>Supplier systems MAY require change to accommodate P339 at those Supply companies who wish to take advantage of its enablers. Proactive Supply companies who may be particularly keen to take early advantage of opportunities arising soon after the proposed P339 implementation date, at Elective HH settlement, may be anticipated to commit early to deliver any change to systems and</p>

Respondent	Response	Rationale
		<p>processes that will take advantage from P339 enablers. The decision upon benefits arising and timetable at individual Suppliers to position internal systems and processes to take advantage of P339 is a commercial decision predominantly. Those Suppliers who are prepared to commit to the proposed P339 implementation date should not be compromised by those who are not so minded at this time.</p> <p>Inputs from Distributors and NG to previous phases of P339 review have indicated minimal impact and costs attached to P339 implementation of itself, so P339 proposed implementation date is unlikely to be compromised here.</p> <p>The changes to Central systems that MUST be delivered to accommodate P339 will now be very well understood as a result of the detailed costing exercise that has been completed against P339 proposals. It is assumed that changes identified can be delivered to meet the proposed P339 implementation date.</p>
ScottishPower	Yes	ScottishPower supports this implementation date as this is in-line with the start of the TNUoS charging year, so would be the most sensible approach.
SmartestEnergy	Yes	[None]
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Yes	We agree with the recommendation to implement P339 on 1st April 2017 because it should align with CMP266 'Removal of Demand TNUoS charging as a barrier to future elective Half Hourly settlement'.
Stark	Yes	In agreement with the Workshop rationale.
TMA Data Management Ltd	[No response]	We understand the rationale behind the implementation date and support it, however, we need as much notice as possible between approval and implementation.
Western Power Distribution	Yes	[None]

Question 4: Do you agree with the Panel's initial view that P339 should be treated as a Self-Governance Modification?

### Summary

Yes	No	Neutral/No Comment	Other
10	0	1	0

### Responses

Respondent	Response	Rationale
Npower Group plc	Yes	Yes as long as this will result in P339 being delivered by April 17.
OVO Energy	Yes	[None]
Power Data Associates Ltd	[No response]	[None]
Salient Systems Ltd	Yes	[None]
ScottishPower	Yes	Agree
SmartestEnergy	Yes	[None]
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Yes	We fully support this modification progressing via the Self-Governance route as we do not believe it will have material/ discriminatory impact on the market.
Stark	Yes	As the criteria appears to be fulfilled.
TMA Data Management Ltd	Yes	[None]
Western Power Distribution	Yes	[None]

Question 5: Do you believe that the costs of central system changes as a result of P339 (£81K) are justified taking into account the anticipated benefits?

## Summary

Yes	No	Neutral/No Comment	Other
10	0	1	0

## Responses

Respondent	Response	Rationale
Npower Group plc	Yes	[None]
OVO Energy	Yes	We believe that the costs of implementing P339 are fully justified. P339 will help the electricity market facilitate elective HH Settlement for domestic customers. This will enable the introduction of innovative new products to the domestic retail market which will increase competition and ultimately benefit customers.
Power Data Associates Ltd	Yes	As stated above this cost is small – probably smaller than the participant time taken to discuss this proposal – compared with the benefit
Salient Systems Ltd	Yes	[None]
ScottishPower	Yes	This modification enables a number of other existing and potential industry changes, which will present additional benefit opportunities to Parties
SmartestEnergy	Yes	[None]
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Yes	We do not view this as a material difference in the cost.
Stark	Yes	Benefits will be more fully realised in the future, but should justify this initial cost.
TMA Data Management Ltd	[No response]	No comment
Western Power Distribution	Yes	[None]

## Question 6: Do you have any further comments on P339?

### Summary

Yes	No
3	8

### Responses

Respondent	Response	Rationale
Npower Group plc	No	[None]
OVO Energy	Yes	The primary benefit of P339 is that it will remove a significant cost barrier to elective HHS. Once elective HHS is possible, we expect that domestic customers will be provided with more choice and innovation in the domestic retail electricity market. We are also optimistic that HHS will enable the introduction of further products that will not only reduce consumer bills, but contribute to system security and the achievement of renewable targets.
Power Data Associates Ltd	Yes	<p>I am not convinced of the rationale for setting the scaling factors at the same level as NHH. The level of scaling factors is a factor which SVA can adjust subsequently. So while it may be appropriate to set the level at the values in this report in the short term, I would suggest that this aspect should be subject to further consideration over the next 12 months within SVG. The consideration should review all the aspects included within scaling factors, which customer grouping contribute to these 'errors' and who should benefit from adjustment of the 'error'. We already have a number of 'fudge factors' – LLF, GCF all seeking to make adjustment for known errors I remain concerned that the scaling should be as fairly applied as possible.</p> <p>It should be noted that smart metering is designed to include export measurement by design, so increasingly; by end of [2020!] whole current sites will have an export meter fitted and providing consumption data.</p> <p>I would also suggest that the SRAG could usefully consider reviewing the 30kW export limit, which is configurable item within the control of SVG and may propose to steadily reduce it over the following years. This would have the effect of ensuring metering and settlement of the consumption progressively increases reducing the settlement</p>

Respondent	Response	Rationale
		error. An alternative would be to require all new FiTs sites after [Oct 2017?] to have a smart meter with export consumption settled.
Salient Systems Ltd	No	[None]
ScottishPower	Yes	It is difficult to justify or otherwise the Scaling Weights that have been allocated to the new CCCs. ScottishPower would welcome further analysis in this area to ensure that these are accurate.
SmartestEnergy	No	[None]
SP Distribution / SP Manweb	No	[None]
SSE Energy Supply Limited	No	[None]
Stark	No	[None]
TMA Data Management Ltd	No	[None]
Western Power Distribution	No	[None]