

Question 1

Company	Confidential/ Anonymous	1. Do you understand the intent of DCP 444?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	Yes, we do.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
SPEN	Non-confidential	Yes.	Noted
E.ON UK PLC	Non-confidential	Yes, it is outlining how to approach II and DR settlement runs for the REP-002 and REP-901.	Noted
IDCSL	Non-confidential	Yes.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes – to determine whether to keep the II run in the REP-002 flows and additionally whether to keep the DR run.	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Working Group Conclusions		All respondents understood the intent of DCP 444.	

Question 2

Company	Confidential/ Anonymous	2. Are you supportive of the principles of DCP 444?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	Yes.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
SPEN	Non-confidential	Yes.	Noted
E.ON UK PLC	Non-confidential	Yes, we are supportive of the exclusion of Supercustomer DUoS charges at run types II and DR.	Noted
IDCSL	Non-confidential	Yes.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes – the II run provides valuable information for both billing and forecasting purposes.	Noted
UK Power Networks	Non-confidential	Yes.	Noted

Working Group Conclusions	All respondents were supportive of the principles of DCP 444.
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Question 3

Company	Confidential/ Anonymous	3. Which of the four options do you prefer? Please provide your rationale.	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	We believe Option 1 is the most appropriate as this would be the most cost-effective solution. If a change proposal was to be raised, then we would want to ensure there is minimum cost/system change impact for something that would become redundant.	Noted
Northern Powergrid	Non-confidential	Option 1. We won't use the data for billing.	Noted
SPEN	Non-confidential	Do not process the REP-002/A/B and raise a BSC change to stop the II REP-002/A/B message being sent. SPEN don't wish to use this data for forecasting, NETSO reporting or DUoS billing purposes. If the II settlement flows are loading into the Durabill billing system, then these flows would generate errors in the incoming flows screens. The system users would verify the incoming REP-002A/B to determine if these errors were genuine or not, and concern is that genuine error could be ignored.	Noted
E.ON UK PLC	Non-confidential	Option 1: <i>Receive II REP-002/A/B – do not calculate charges, do not issue REP-901 and do not use in billing.</i> Assuming the REP-002 will have to be sent for MHHS, then this option will have the lowest financial impacts (e.g. credit cover, and DUoS	Noted

		billing) as well as the least changes to IT systems and business processes.	
IDCSL	Non-confidential	Option 1. Receive II REP-002/A/B – do not calculate charges, do not issue REP-901 and do not use in billing. This is the least cost option for IDCSL as no IT system changes are required to receive or process the REP002. IDCSL would not bill on the II settlement run, instead we will bill on the SF settlement run as BAU.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	<p>Option 3. Receive II REP-002A/B – calculate charges and issue REP-901 and use in billing as the initial run (SF becomes a reconciliation run).</p> <p>The II run provides an early indication of meter readings for month end reporting. Under MHHS, the II run will - for the first time - provide more accurate readings for a large number of meters on an expedited timescale. This is a marked change from the pre-MHHS world and so warrants inclusion (where previously it was sensible to exclude II).</p> <p>The objective of MHHS is to provide readings more frequently. Additional delay (by excluding II) therefore runs contrary to the primary purpose of MHHS.</p> <p>From a demand forecasting/revenue reporting perspective, if the II run were not billed, but used for information only, this would create a discrepancy between the latest data used to construct forecasts and the data used to bill customers.</p>	Noted
UK Power Networks	Non-confidential	<p>Our preference is for Option 4.</p> <p>We had thought that for advanced meters we would also receive the IF-013 for II runs for sites that have not had meter readings or estimates from the registered Data Service and that these would be utilised in DUoS billing as the system will not differentiate those messages based on settlement run. Therefore billing aggregated DUoS using the II run data from the REP-002 messages would have ensured consistency and completeness.</p>	Noted

		<p>However we have now further reviewed the MHHSP-DES138-Interface Catalogue v 5.8, in which the IF-013 interface notes section contains the following – “THE MDS WILL ONLY ISSUE IF-013 FOR MISSING PERIODS FOR THE 'SF RUN' onwards (ie IF-013's will not be issued for the II Run)”. This is not obvious when reviewing the DI-160 element of the message structure and had not been present in earlier versions of the catalogue (and is somewhat inconsistent with the approach being taken to REP-002s).</p> <p>Therefore at II we will have incomplete data and can't rely on the data population of the REP-002. In the end-state, II runs are only 3 days prior to SF and so waiting for a full set of data for both aggregated and site specific billing at SF is our preference.</p> <p>Note that option 3 is the only sensible alternative but we do not support this option.</p>	
Working Group Conclusions		<p>Four respondents were in favour of option 1</p> <p>One respondent was in favour of option 3</p> <p>Two respondents were in favour of option 4.</p>	

Question 4

Company	Confidential/ Anonymous	4. Do you see value in receiving the II data in the REP-002/A/B for forecasting purposes? 4a: If so, should it also be billed for consistency?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	<p>Yes, we see value in receiving the II data for demand forecasting purposes, but we do not believe these should be used for billing purposes. By retaining the II for forecasting, we believe this will have a positive impact on suppliers' accuracy in forecasting volumes, which could lead to more accurate estimates of required demand leading to smaller reconciliations. This could benefit suppliers by reducing cashflow uncertainty. We also believe that if the II was to be billed, the SF would need to be amended to be a reconciliation run as</p>	Noted

		suppliers would be billed twice for the same period. Due to the timings, the initial settlement run, and the first reconciliation run would be billed on the same invoice, thus leading to additional, in our view, significant changes being required to introduce billing for II.	
Northern Powergrid	Non-confidential	There is some value in receiving the II data. Access to this data would be good for short term estimating, it would help with the monthly estimate under current settlement arrangements. However under MHHS, data will be arriving sooner.	Noted
SPEN	Non-confidential	No, SPEN don't wish to use this II data for forecasting purposes, and we would query accuracy of this data.	Noted
E.ON UK PLC	Non-confidential	Our current analysis is inconclusive on how beneficial it is for forecasting.	Noted
IDCSL	Non-confidential	No, we see no value in receiving the II data for forecasting purposes.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes – as per the response to question 3, the II data provides valuable information on the most recent meter reads and should be billed so as to not introduce discrepancies across the business. This, of course, being subject to understanding impact on Suppliers.	Noted
UK Power Networks	Non-confidential	We see no benefit in using the II runs for forecasting given that there will only be 3 days between those and SF. However, if the additional II run data is available and loaded into the billing system, if that is the preferred option, then it should also be used in billing.	Noted
Working Group Conclusions		The views on whether the data would be beneficial for forecasting purposes were mixed, with 3 believing it would be of benefit, three stating they did not see any benefits and one stating their current analysis is	

	inconclusive on how beneficial it is for forecasting.
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Question 5

Company	Confidential/ Anonymous	5. If a BSC Change Proposal or MHHS CR is raised to remove the II run, should the DR run also be removed?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	It is an indication that is of value to the demand forecasting process therefore a change should not be raised to remove the II. We believe the II run should not be removed but the DR should be considering the compressed settlement calendar under MHHS. As the DR run doesn't have sequence numbers this creates system issues, and we also believe that this is appropriate to remove any legacy requirements.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
SPEN	Non-confidential	Yes, both flows should be removed on the same BSC Change proposal.	Noted
E.ON UK PLC	Non-confidential	Yes, if the II run were removed then it also makes sense to remove the DR run to prevent the REP-002 and REP-901 being issued for both run types.	Noted
IDCSL	Non-confidential	We do not have any view on the DR run but if it has never been sent and no expectations to send it in the future, makes sense to remove the DR run for cleanliness.	Noted
Scottish Hydro Electric Power Distribution plc and Southern	Non-confidential	The DR run should not be removed and ideally greater use should be made of DR in the future to correct mistakes in the data. The DR run provides a particular benefit to correct erroneous DF readings that have overwritten otherwise sensible SF, R1, R2, R3 and	Noted

Electric Power Distribution plc		<p>RF readings. There is no run post-DF so no way to correct a DF run once issued. A recent trading issue highlighted how readings that are still in dispute can be provided at the DF stage.</p> <p>The working group indicated that in the past, a second DF run has been issued and this caused significant difficulties. A DR run with a sequence number above DF would resolve this.</p> <p>There would also be a benefit to using DR between II, SF, R1, R2 and R3 to correct obviously erroneous data without waiting for the next settlement run. This would reduce the impact of faulty meter submissions on both Suppliers and DNOs/IDNOs.</p>	
UK Power Networks	Non-confidential	<p>Yes it would seem appropriate to also remove the DR run for consistency. Note any change would be required to add a new entity to REP-002/A/B and REP-901 to replace DI-160.</p> <p>Also note that v5.9 of "MHSP - ERI011B - ECS Reports – External" in the REP-901 structure differentiates the end-state population of DI-160 from the transition list, by removing II runs. We believe this is a typo as it is not consistent with other messages.</p>	Noted
Working Group Conclusions		Five respondents believe that if a BSC Change Proposal or MHHS CR is raised to remove the II run the DR run should also be removed. Two respondents believe that it should not be removed.	

Question 6

Company	Confidential/Anonymous	<p>6. Do you consider that the proposal better facilitates the DCUSA General Objectives?</p> <p>If so, please detail which of the General Objectives you believe are better facilitated and provide supporting reasons.</p> <p>If not, please provide supporting reasons.</p>	Working Group Comments
SSE Energy	Non-	Yes, General Objective 4, as per the change proposal.	Noted

Supply Ltd (SSE Business Energy)	confidential		
Northern Powergrid	Non-confidential	Yes – although the data is not currently used, given the clarity gained it will have a positive impact on Objective 4.	Noted
SPEN	Non-confidential	Yes - The promotion of efficiency in the implementation and administration of the DCUSA.	Noted
E.ON UK PLC	Non-confidential	<p>Option 1 provides a positive impact to object 4, this is through removal of future billing runs at II which would be inefficient, and therefore removes unnecessary processing and minimises additional costs.</p> <p>Should any other option be chosen then it would have a negative impact to objective 4, this is because a more substantial design and delivery for the issue would be required, which would come as a cost to Suppliers and their end consumers.</p>	Noted
IDCSL	Non-confidential	We agree with the proposer that General Objective 4 is better facilitated.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes: we agree with the WG – 4. The promotion of efficiency in the implementation and administration of the DCUSA	Noted
UK Power Networks	Non-confidential	We believe that DCUSA General Objective 4 will be better facilitated by this change as it will ensure that DCUSA describes the processes relating to SuperCustomer DUoS Reports and their billing.	Noted

Working Group Conclusions	All respondents believe that this CP will better facilitate DCUSA General Objective 4, although one respondent stated only if option 1 was progressed. They believe the other options would have a negative impact on objective 4.
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Question 7

Company	Confidential/ Anonymous	7. Are you aware of any wider industry developments that may impact upon or be impacted by this CP?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	Not at this time.	Noted
Northern Powergrid	Non-confidential	No.	Noted
SPEN	Non-confidential	No.	Noted
E.ON UK PLC	Non-confidential	No, we are not aware of any wider industry development impacts other than this CP.	Noted
IDCSL	Non-confidential	The MHHS programme has the II and DR in artefacts so if Option 4 was the solution taken forward and approved, relevant Change Requests will need to be raised.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	No.	Noted

UK Power Networks	Non-confidential	There is currently a lot of work underway for MHHS which is impacting upon systems, the introduction of a change at this stage might be impacted by when any further changes can be developed and tested.	Noted
Working Group Conclusions		Most respondents stated they do not believe there are any wider industry developments that may impact upon or be impacted by this CP. Two mentioned the MHHS programme and that this change may impact, particularly if option 4 is progressed.	

Question 8

Company	Confidential/Anonymous	8. How are you impacted by the outcome of this CP?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	The impact wholly depends on the solution taken forward, we believe that Option 2 and 3 would be additional cost. We are strongly against Option 4, as it would result in the loss of II data, which is of significant importance to our demand forecasting processes.	Noted
Northern Powergrid	Non-confidential	Additional costs to the billing system.	Noted
SPEN	Non-confidential	SPEN will be impacted if the working groups decides to process the II settlement runs. The impact will depend on the degree of processing that is implemented. Receive II REP-002/A/B – the receipt of these flows, will means that users will need to verify the status of the flows and ensure that these flows don't mask real failure of different settlement runs. Processing this II settlement will mean that the billing system and NETSO reports will need to be changed, which will incur development and testing costs.	Noted
E.ON UK PLC	Non-	Each option comes with different impacts with Option 1 likely having	Noted

	confidential	<p>the lowest impact and therefore it being our preferred choice. The likely impacts for each option are listed below.</p> <ul style="list-style-type: none"> - Option 1: The need to update our IT systems to load, process the additional data from the REP-002, which comes with testing and implementation costs as well as enduring support costs. - Option 2: The need to update our IT systems to load, process the additional data from the REP-002 and REP-901 which comes with testing and implementation costs, as well as enduring support costs beyond that of option 1. - Option 3: Possible increase in Supplier billing costs due to additional run type billing. Additional billed run types will also require increased credit cover which will also have an associated cost to the Supplier. Change in current business processes to validate additional invoices will require FTE uplift costs to cover. Additional auditing requirements if new billing runs are introduced. The need to update our IT systems to load, process additional data from the REP-002 and REP-901 which comes with testing and implementation costs as well as enduring support costs. - Option 4: Assumed this is not likely to occur until after MHHS migration starts meaning that all impacts listed for Option 3 (above) will still occur. <p>It is also important to highlight that any increase in Supplier costs may also result in an increase in end consumer costs.</p>	
IDCSL	Non-confidential	If Option 2 and 3 are taken forward, it would require IT system and process changes to enable the processing of the dataflow and additional admin resource – for no perceived benefit to recovery of DUoS charges.	Noted
Scottish Hydro	Non-	The inclusion of the II run offers the opportunity to improve the	Noted

Electric Power Distribution plc and Southern Electric Power Distribution plc	confidential	<p>accuracy of month end reporting.</p> <p>The retention and greater use of the DR run would allow faulty meter readings to be resolved more quickly and therefore allow improved charging of network volumes through customer billing.</p> <p>As per the HLIA, St Clements Services (SCS) anticipate that none of the options would exceed £30k split between the DNOs. Options 2 and 3 and likely to be at the top of this range. Option 1 (and option 4 if DNOs wish to make changes similar to those for option 1) may be slightly less.</p>	
UK Power Networks	Non-confidential	<p>We will need to ensure that our billing system and associated processes are able to deal with the solution.</p> <p>Option 4 is the least impactful.</p>	Noted
Working Group Conclusions		All respondents stated that the solutions would impact them with varying degrees depending on the solution taken forward. With most stating that option 2 and 3 would have the most impact on IT systems.	

Question 9

Company	Confidential/Anonymous	9. Do you agree with the Working Group's proposed implementation date? If not, please provide your rational.	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	Yes.	Noted
Northern Powergrid	Non-confidential	Yes.	Noted
SPEN	Non-confidential	Yes.	Noted

E.ON UK PLC	Non-confidential	Yes, based on Option 1 we support the proposed date. Should any of the other options be progressed, then it will require greater system changes and would need a minimum of 6 months implementation time.	Noted
IDCSL	Non-confidential	Yes, we agree with the implementation approach of aligning with the MHHS M8 milestone.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	Yes.	Noted
UK Power Networks	Non-confidential	Yes.	Noted
Working Group Conclusions		All respondents agree with the proposed implementation date, with the exception of one who state that if options 2, 3 or 4 are progressed then a six months lead time would be required for system changes.	

Question 10

Company	Confidential/Anonymous	10. Do you have any other comments on DCP 444?	Working Group Comments
SSE Energy Supply Ltd (SSE Business Energy)	Non-confidential	Not at this time.	Noted
Northern Powergrid	Non-confidential	No.	Noted

SPEN	Non-confidential	No.	Noted
E.ON UK PLC	Non-confidential	Once we transition to the new settlement calendar, there will only be 3 calendar days between the II run (D+4) & SF (D+7). Within those 3 days full use of the load shape data will have been applied, meaning the aggregated DUoS bill produced at SF will at least be more reflective of a Supplier's settlement position on what will be a targeted settlement run. This reduces the need for a DNO to reconcile data they billed 3 days ago as per option 3.	Noted
IDCSL	Non-confidential	No.	Noted
Scottish Hydro Electric Power Distribution plc and Southern Electric Power Distribution plc	Non-confidential	No.	Noted
UK Power Networks	Non-confidential	No.	Noted
Working Group Conclusions		The Working Group noted the comment regarding the new settlement calendar reducing the need for a DNO to reconcile data previously billed.	