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CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0062 – REMOVAL OF ERDA METERINGPOINTENERGYFLOW CHANGE RESTRICTION

On 13 October 2023 the Code Manager issued an impact assessment to industry to seek feedback on the solution for R0062.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
DATE ISSUED	07/12/2023
RESPONSIBLE COMMITTEE	Technical Expert Panel
LEAD ANALYST	Harriet Truss

DATE IMPACT ASSESSMENT ISSUED	13/10/2023
RESPONSE DEADLINE	03/11/2023

Question 1:	Do you have any comments on the proposed solution?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator (DNO))	We believe that the proposed solution resolves the issue of customer detriment where an MPAN requires a change to the energy direction more than once in it's lifetime. Currently where more than one change to an energy direction is required for whatever reason, the only recourse for the customer is for the MPAN to be disconnected and a new MPAN raised. This is not good customer service.	Noted – thank you.
Northern Powergrid (DNO)	We support the proposal. The current REC drafting restricts more than one change to the EDI unnecessarily as the CSS does not validate the data item. In doing so, it creates unnecessary impacts to the customer, including the creation of a new MPAN, new rates etc or adversely if a new MPAN is not created, the customer is charged incorrectly. The creation of a new MPAN creates additional workload for DNOs and Suppliers and increases the risk of theft in conveyance where a customer does not agree a new supply contract.	Noted – thank you.
Scottish Power Energy Networks (DNO)	We are supportive of the introduction of this capability.	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	SSE are in favour of the proposed solution as it will help us with any incorrectly registered MPAN's.	Noted – thank you.

Question 2:	Do you believe there are any requirements that have not been documented? If yes, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We believe that all the requirements were fully explored and documented.	Noted – thank you.
Northern Powergrid (DNO)	n/a	-
Scottish Power Energy Networks (DNO)	No	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	SSE would like clarity on the role of the other supplier in this process where the import and export supplies are registered to different suppliers. We strongly believe that both suppliers have to agree and notify the DNO as this process progresses.	The Code Manager does not believe that the scenario raised is specific to lifting the restriction under R0062 and should be managed the same way as it would for a first-time correction.

Question 3:	Do you support the intention that the solution is for exceptional use only and should/would not be made available in business as usual processes?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Yes we would support the intention that the solution is for exceptional use only to correct errors and prevent customer detriment. We feel that the Performance Assurance is an appropriate platform to ensure that industry complies with this requirement.	Noted – thank you. The Code Manager notes that R0062.IA.A003 addresses the Performance Assurance approach.
Northern Powergrid (DNO)	Yes, the solution is only required to resolve records that fall outside of the business-as-usual process.	Noted – thank you.
Scottish Power Energy Networks (DNO)	We are supportive of this	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	SSE strongly agree this process should be for exceptional use only. Any incidence of switching beyond twice should require a detailed investigation by the DNO and relevant suppliers.	Noted – thank you. The Code Manager supports that Suppliers and DNOs should only be progressing corrections where a robust assessment has been made that the risks outweigh those of terminating the RMP.

Question 4:	As a Supplier, please provide a view of the volume of requests you expect to make for both required Energy Direction corrections that cannot currently be fulfilled and expected future requests.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	N/A	-
Northern Powergrid (DNO)	n/a	-
Scottish Power Energy Networks (DNO)	N/A	-
SSE Energy Supply Ltd (Energy Supplier)	We would expect the number of cases to be very minimal, but still feel the solution is of benefit for when it does happen.	Noted – thank you.

Question 5:	Would implementing this change incur any costs to your business? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Our service provider has advised that there will be a config change to increase the number of EDI changes to 99, however, no cost anticipated; function was tested as part of R8.0	Noted – thank you.

Northern Powergrid (DNO)	None, as only a configuration change in ERDS to increase the number of EDI changes, is required.	Noted – thank you.
Scottish Power Energy Networks (DNO)	Costs would be minimal	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	As a supplier this change will have no cost impacts.	Noted – thank you.

Question 6:	What is your anticipated lead time for implementing this change?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Our Service Provider has advised that as this is only a config change, very little lead time is required. A week to test and provide an optional script to change the config value to 99.	Noted – thank you.
Northern Powergrid (DNO)	None.	Noted – thank you.
Scottish Power Energy Networks (DNO)	We are supportive of the flexibility in the change of between 1 and 3 months, we would hope to implement within a month.	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	Our systems require no lead time to bring this change.	Noted – thank you.

Question 7:	Do you support a limited implementation lead time that allows for the legal text changes to be made at the earliest opportunity?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Yes we would support a limited implementation lead time to allow for the legal text changes to be made at the earliest opportunity.	Noted – thank you.
Northern Powergrid (DNO)	Yes, the sooner the change can be implemented the better.	Noted – thank you.
Scottish Power Energy Networks (DNO)	Yes	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	We have no issues on lead time.	Noted – thank you.

Question 8:	Do you identify any tangible, or intangible, benefits to your business by implementing the proposed changes? If yes, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	We believe that the proposed solution resolves the issue of customer detriment where an MPAN requires a change to the energy direction more than once in it's lifetime. Currently where more than one change	Noted – thank you.

	to an energy direction is required for whatever reason, the only recourse for the customer is for the MPAN to be disconnected and a new MPAN raised. We see this change to allow the energy direction to be changed more than once as a tangible benefit to both our business and our customers as there would be no loss of history for a customer and the customer would not have to be issued with a new MPAN that they then have to register with a Supplier and amend their own internal records.	
Northern Powergrid (DNO)	The effort required to complete the below will be removed: • Create a new MPAN. • Liaison with the Supplier to get registered. • Disconnection of the existing MPAN. Our service to customers will be improved.	Noted – thank you.
Scottish Power Energy Networks (DNO)	We have not thus far had to use this functionality, however if there is a requirement then there is an obvious benefit to Settlement accuracy and to the Customer in the retention of the MPAN	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	SSE are of the view this change will improve the customer experience.	Noted – thank you.

Question 9:	What is the impact to your business/customers if this change was not implemented? For example, what are the associated costs/risks of creating a new MPAN where changing the Energy Direction is not an available option?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	Impact to customers with loss of history Customer detriment that they would have to register a new MPAN with a Supplier Customer would be inconvenienced in having to amend their own internal records Incomplete settlement data Risk that new MPAN would not be registered in a timely manner Risk to settlement with inaccurate data Poor customer experience with the DNO and Supplier	Noted – thank you.
Northern Powergrid (DNO)	The creation of a new MPAN, is inconvenient for the customer in terms of agreeing a new supply contract with the supplier, they may also be subject to new/increased energy charges, adversely, if a new MPAN is not created, the customer is charged incorrectly. The creation of a new MPAN creates additional workload for DNOs and Suppliers and increases the risk of theft in conveyance and impacts settlement where a customer does not agree a new supply contract.	Noted – thank you.
Scottish Power Energy Networks (DNO)	The costs from a DNO in the creation of an MPAN is minimal, the issue is in the ability to account for Settlement volumes and bill DUoS charges accurately.	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	Creating a new MPAN has settlement issues as nothing can be settled whilst a new mpan is being created and registered. This change will	Noted – thank you.

	provide a much better customer experience if a customer's MPAN need to be switched.	

Question 10:	Will any training be required to support this change? If yes, please provide details including who do you see as providing this training?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No training will be required to support this change.	Noted – thank you.
Northern Powergrid (DNO)	No.	Noted – thank you.
Scottish Power Energy Networks (DNO)	Minimal training will be required for users of the MPRS system	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	No training required.	Noted – thank you.

Question 11:	Do you believe that the benefits of this change continue to be relevant in the new MHHS arrangements?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	No response provided	-
Northern Powergrid (DNO)	Yes, as corrective / more than one change to the Energy Flow data item may still be required in the MHHS arrangements.	Noted – thank you.
Scottish Power Energy Networks (DNO)	Yes, we believe that this is still relevant in the MHHS Regime.	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	SSE believe the benefits will be the same under MHHS.	Noted – thank you.

Question 12:	Would there be additional cost impacts to your organisation if the one-time restriction was reinstated at the point of MHHS go-live?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	As this is a configurable item there would be minimal additional cost impacts to organisation if the one-time restriction was reinstated at the point of MHHS go-live.	Noted – thank you.
Northern Powergrid (DNO)	Yes, the costs associated with the activities that this change removes would then apply.	Noted – thank you.
Scottish Power Energy Networks (DNO)	There would be minimum systems cost	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	No but would welcome an enduring solution if this is felt to be detrimental following MHHS.	Noted – thank you.

Question 13:	What assumptions have been made during this impact assessment?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	None	-

Northern Powergrid (DNO)	n/a	-
Scottish Power Energy Networks (DNO)	Assumption has been made that this will be a process will be utilised rarely, and that there is benefit to Suppliers in retaining the MPAN as this means that they do not require detailed engagement with the customer to support contract re-negotiations.	Noted – thank you.
SSE Energy Supply Ltd (Energy Supplier)	Suppliers will continue to raise incorrectly registered MPAN's with the DNO as before. Numbers will continue to be low.	Noted – thank you.

Question 14:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (DNO)	None	-
Northern Powergrid (DNO)	No	-
Scottish Power Energy Networks (DNO)	None	-
SSE Energy Supply Ltd (Energy Supplier)	No	-