



**APPLICATION FOR RESTATEMENT OF
2009-10 REPORTED LOSSES
(RESUBMISSION – JULY 2013)**

Electricity North West Limited
Registered Office:
304 Bridgewater Place,
Birchwood Park,
Warrington,
Cheshire.
WA3 6XG.

Registered no: 2366949 (England)

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1. Introduction

July 2011 Interim Decision on the Electricity North West Restatement Request

- 1.1. During 2010, Electricity North West, in common with some other DNOs, noted high levels of data reconciliation corrections arising in reported losses data from abnormal levels of Gross Volume Corrections (GVC) and other “data cleansing” activity by suppliers. These corrections increased the level of reported losses for Electricity North West for 2009-10.
- 1.2. Following Ofgem’s 2011 consultation on the issue we submitted a formal request¹ on 14 April 2011 for the restatement for units distributed for relevant year 2009-10. Ofgem provided an interim decision on the request on 29 July 2011. This decision permitted a recalculation of 2009-10 reported units distributed, (ie the Annual Incentive) leading to an increase of 316.5GWh, comprising:
 - (i) A Gross Volume Correction (GVC) adjustment of 228.2GWh.
 - (ii) A Negative EAC adjustment of 52.3GWh.
 - (iii) A Dispute Final (DF) adjustment of 36.1GWh.²
- 1.3. In order to provide a suitable baseline for analysis, all data provided in this submission is “Pre- Interim Restatement” unless specifically identified otherwise.

April 2012 Resubmission

- 1.4. Following a further consultation by Ofgem, all licensees were given the opportunity to apply for restatement of their 2009-10 reported losses data, based on satisfying defined statistical tests and guiding principles, and the application of a specified correction methodology “the SP methodology”.
- 1.5. We submitted a formal request on 13 April 2012 for the restatement for units distributed for the year 2009-10. This submission was considered by Ofgem in the consultation paper of 16 November 2012 and formed the basis of the restatement of the Annual Incentive in that document, as described in the next section.

July 2012 Data Request

- 1.6. Following the April 2012 DNO submissions Ofgem requested a further submission of data necessary for closing out the DPCR4 incentive, and set out statistical tests and guiding principles to be used to calculate a restated figure for 2009-10 where appropriate.

¹<http://www.ofgem.gov.uk/Networks/ElecDist/Policy/losses-incentive-mechanism/Documents1/Losses%20Submission%20140411.pdf>

² This adjustment was in respect of DF data which had been included in the units distributed total for 2009-10 in error; which was inconsistent with our DPCR4 reporting methodology. See Appendix B.

- 1.7. On 16 November 2012 Ofgem issued a consultation³ on the restatement of 2009-10 data and closing out the DPCR4 losses incentive mechanism. In this document Ofgem consulted on their assessment of the annual incentive and close out positions for Electricity North West as follows:

Table 1 Ofgem November 2012 Consultation

	Restatement	2009-10 losses	Value £m
Annual Incentive	Allowed	5.22%	+0.10
Close out (PPL term)	Allowed	4.94%	+0.55

July 2013 Submission

- 1.8. On 12 July 2013, following further work on both the approach and the data used in the close out process, Ofgem issued a decision document setting out the further process. This included a data request to all DNOs and a request for submission of applications from DNOs wishing to restate 2009-10 data for the purpose of either the annual incentive or closing out the DPCR4 mechanism.
- 1.9. This report sets out the data and calculations for the restatement by Electricity North West of the number of units distributed in 2009-10, based on the approaches set out in Ofgem's decision document.
- 1.10. The report may be read in conjunction with the earlier submissions of April 2011 and April 2012, and in particular these documents may be referred to for some background details which are not repeated in this document:
- The DPCR4 reporting methodology used by Electricity North West.
 - Details of a single MPAN error which occurred in 2005 and was corrected by settlement runs at the time. The distorting effect of this error is removed from the data presented for analysis in this submission.
 - Initial evidence of 2009-10 abnormality.
- 1.11. The report is set out as follows:
- Commentary on resubmitted data
 - Fully reconciled data for close out
 - Reporting date data for input to Approach C
 - Annual Incentive data in revenue returns
 - Close out calculation using Approach C
 - SF normalisation
 - Statistical evidence of 2009-10 abnormality
 - Calculation of abnormal variations in reported R1 to RF
 - Summary distributed units for close out
 - Commentary on the proposed credibility criteria

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<http://www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=762&refer=Networks/ElecDist/Policy/losses-incentive-mechanism>

- Restatement of 2009-10 Annual Incentive using Approach C
 - Statistical evidence of 2009-10 abnormality
 - SF normalisation
 - Calculation of abnormal variations in reported R1 to RF
 - Summary distributed units by tariff basket for the annual incentive

1.12. This submission constitutes a formal request for agreement to restate numbers of units distributed for the 2009-10 regulatory reporting year on a different basis of calculation from that agreed by Ofgem on an interim basis in the earlier decision letter of 29 July 2011. The submission also proposes the 2009-10 data to be used in the close out calculation, ie the units distributed in the last year of DPCR4 excluding any corrections to prior years, but with subsequent settlement corrections to the final year added in.

2. Data

Commentary on Data Audit

2.1. The data assurance audit carried out by ESP Consulting⁴ identified a series of reconciling items between our 2009-10 submission and data provided by Elexon. Ofgem's decision document grouped the reconciling items identified by the audit process into three categories:

- Contentious differences (requiring policy decisions)
- Acknowledged errors
- Non contentious differences

Contentious Differences

2.2. Our July 2012 submission for close out included a small adjustment for an Extra Settlement Determination relating to an approved settlement trading dispute DA329. This is referred to in section 2.1.2 of the ESP Consulting report and identified as 2GWh in 2009-10. In accordance with Ofgem's decision we have removed these units from the reconciled data for close out and the data submitted for Approach C. The adjustment was not included in the data reported under the annual incentive.

2.3. The second issue concerns the volume of units that remained unbilled at a point 12 months after the end of the 2009-10 reporting year. This is identified as the Prior Period Adjustment (10GWh) in section 2.1.2 of the ESP report. Ofgem acknowledge that it was part of ENWL's losses methodology and practice to include these volumes in reports; however Ofgem's decision is that, while it is appropriate to include the volume in the annual returns as part of the standard methodology it is

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<http://www.ofgem.gov.uk/Pages/MoreInformation.aspx?docid=847&refer=Networks/ElecDist/Policy/losses-incentive-mechanism>

not appropriate to include it in the final close out calculation. We have therefore removed these units from the 2009-10 reconciled data for close out and the data submitted for Approach C.

Acknowledged error

- 2.4. During the audit process we found a double counting of unmetered PC1-4 volume in the 2009-10 reconciled data for close out. The data submitted in response to the July 2012 data request included all unmetered volume in site-specific billed units (within the HH sales category), consistent with our billing approach; however we found that, due to the removal of a filter in our reporting system at 1 April 2010, and the use of later data flows in the close out calculation, later unmetered PC1-4 data flows will also have been included in the NHH category in the close out data. This is explained in more detail in Appendix B. The volume is identified under the heading Submission Error (17GWh) in the section 2.1.2 of the ESP data assurance report.
- 2.5. We have adjusted the NHH data that arrived in data flows after 1 April 2010 to remove unmetered PC1-4 volume. This affects the Approach C data from 2010-11 onwards, and is reflected in the reconciled data for close out from the last two months of 2008-09 onwards. The error has no impact on data reported under the annual incentive since this was based on reports received before 31 March 2010.

Non-contentious differences

- 2.6. The other reconciling items identified by the data assurance audit have been acknowledged by Ofgem as reasonable and consistent with our historical reporting methodology.

Fully Reconciled Data for Close Out

- 2.7. This data is fully reconciled (ie with all data allocated back to the relevant settlement month). The date stamp of the individual data items is recorded with additional commentary in Appendix C. The volumes identified above, totalling 29GWh in 2009-10, have been removed to address the identified data assurance issues.
- 2.8. Data has been entered onto the tab "Revised Fully-reconciled – All" in the spreadsheet "Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx". This is compared with the previous submission data on the tab "Fully Reconciled Delta". This shows the total volume removed in 2009-10 to be 24.2GWh, which equates (taking into account updated HH data) to the identified data assurance issues.
- 2.9. The same data is used in the spreadsheet "Backing calculations ENWL.xlsx", tab "Reconciled Sett Data", to calculate the average performance in the normal years.

Reporting Date Data for Input to Approach C

- 2.10. Data is generated from the reconciled data for closeout by time-shifting each of the NHH monthly reconciliation runs, using an approximate settlement calendar, to create a reporting date data set. We have illustrated this approach by colour-coding the settlement years on the data-entry tab (see paragraph 2.12 below). The justification for taking this approach is set out in paragraphs 2.14 to 2.18.

- 2.11. The methodology in more detail is as follows:
- Purchases and HH sales are fully reconciled data (as for close out);
 - NHH data is based on month-shifting individual settlement reconciliation runs (approximate settlement calendar);
 - NHH sales are metered PC1-4 only for all years, including after DPCR4;
 - (PC5-8 transferred from HH to NHH billing systems in April 2010)
 - Purchases and HH sales are not presented from April 2010 onwards as this is not required for calculations (and would not be consistent due to PC5-8 volume).
- 2.12. Data has been entered onto the tab “Revised AppC- restatement” in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”. This is compared with the previous submission data on the tab “App C Delta”. This shows that the volume differences relating to the ESD and the Unbilled issue (in the HH sales category) remain in the same years as for the settlement date data, whereas the effect of removing the NHH reporting error is in 2010-11 and later reporting years.
- 2.13. The same data is used in the spreadsheet “Backing calculations ENWL.xlsx”, for calculating the SF normalisation and the R1 to RF abnormality. The SF normalisation sheet produces the output in a form for input to the “Statistical Analysis Close Out” tab in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”

Departures from Annual Reporting Data

HH Units Entering and Exiting

- 2.14. The objective of Approach C is to establish and correct abnormalities in NHH reported data using the historic net (purchases minus sales) HH data in the calculation. In order to provide a suitable basis for this analysis we have reconciled the reported HH data to the volumes relevant to each reporting year (effectively closing out provision accounts) before entering the data into the Approach C calculation. Running the calculation on unreconciled reported data would run the risk of perverse results. Further commentary on the approach taken to CVA data and SVA units entering appears in Appendix C.

NHH Units Exiting

- 2.15. The calculation of the corrections applied under the 2011 interim decision was performed on reporting date data as it actually appeared in management reports at the time. However, this data is not suitable for the application of the SP methodology due to the following:
- Although the HH and NHH SFs were reported as far as possible to the relevant calendar month (to line up with purchases), the NHH reconciliations were recognised when they appeared on the management report that was in use at the time, which was set to a 4-4-5 accounting period; and
 - the last month of each year is not complete, being calculated by a current year estimate which is updated by a Prior Period Adjustment in the following year.
- 2.16. In order to overcome these issues we have used monthly data that is available on a Settlement Date basis and time-shifted this, using an approximate settlement calendar, to create a reporting date data set. The underlying settlement date data also includes relevant 2003-04 and 2004-05 data to make the 2005-06 reported data

fully representative. The volume brought into the statistical analysis from the earlier years is relatively small and visual inspection does not reveal any obvious abnormalities in the data that has been included.

- 2.17. Although this is a proxy for the actual reported data it is more complete and more consistent, in terms of allocation to individual calendar months, than the data in historic reports, and also more amenable to the application of the SP methodology. It should also be noted that the proxy data is used only for the identification of abnormalities and the calculation of corrections. In Approach C for close out the corrected reporting data is returned to settlement date format using the same approximate settlement calendar; and for the annual incentive the calculated correction is applied to the actual reported data.
- 2.18. We believe that the above approaches are consistent with the guidance given by Ofgem in paragraph 2.15 of the decision document.

Annual Incentive Data

- 2.19. This data is consistent with the annual revenue returns, including the March estimates and Prior Period adjustments. No SF adjustment has been applied to the data, consistent with the guidance given by Ofgem in paragraphs 4.11 and 4.12 of the decision document.
- 2.20. Data has been entered onto the tab “Annual Incentive - all” in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”. This tab contains commentary to explain that none of the data assurance issues identified with regard to the closeout data are relevant to the Annual Incentive data, specifically:
- The Extra Settlement Determination was not included in annual reports;
 - The inclusion of HH unbilled was consistent with the reporting methodology;
 - The inclusion of PC1-4 unmetered in NHH units only started after the end of the reporting period.
- 2.21. The monthly breakdown of this data has been entered onto the tab “Annual Incentive Data” in the spreadsheet “Backing calcs ENWL.xlsx”. This data was provided previously in our April 2011 submission. This produces the output in a form for input to the “Statistical Analysis Annual” tab in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”

3. Restatement for Close Out

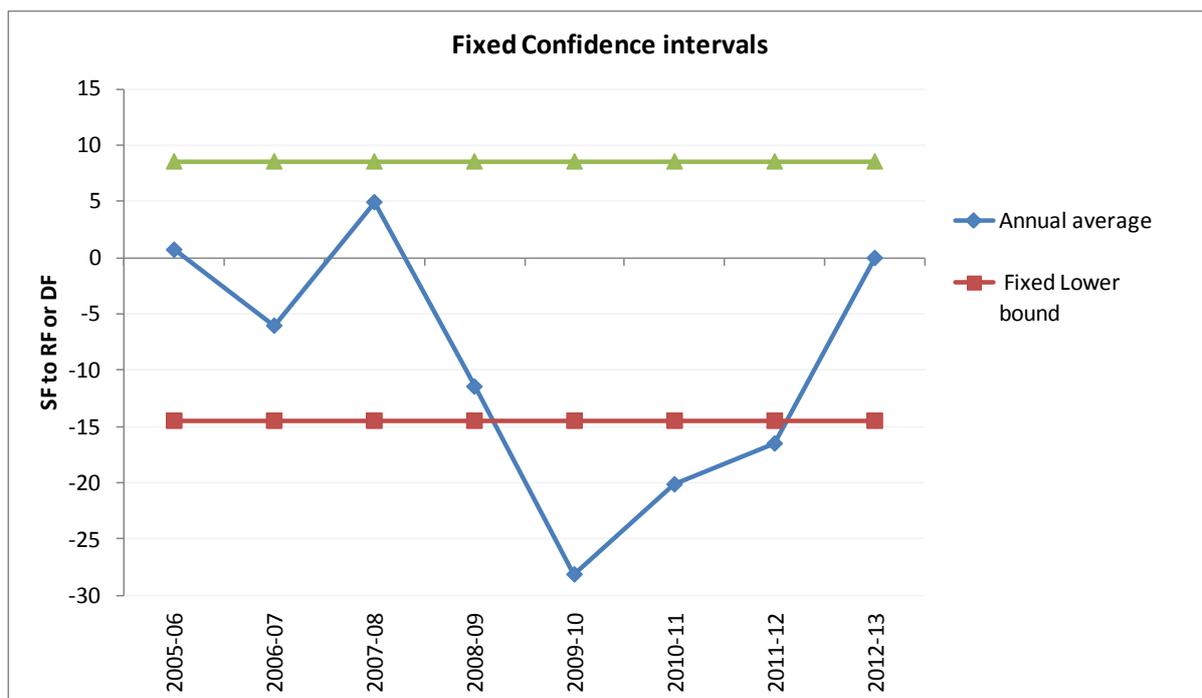
SF Normalisation

- 3.1. The SF normalisation calculations are set out in the spreadsheet “Backing Calculations ENWL.xlsx” on tab “Approach C SF Normalisation”. This is based on calculating monthly Average Percentage Losses (APL%, using the weighted average of data from the normal period), as described in paragraph 3.48 of the decision document.
- 3.2. The total of the SF error for the 2009-10 settlement year is (-119.1GWh). A corresponding adjustment of +119.1GWh is required in order to correct for these variations, ie units distributed need to be increased by 119.1GWh.
- 3.3. For the purposes of statistical tests on the Approach C reporting data, the Normalised SF data is mapped to reporting dates, which generates equivalent figures of 15.7GWh (2009-10); 43.5GWh (2010-11) and 2.1GWh (2011-12).
- 3.4. The SF normalisation calculations generate revised SF-RF reconciliation data for input to the statistical test.

Statistical Test for Abnormality

- 3.5. The adjusted data from the previous step is pasted into the tab “Statistical Analysis Close out” in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”
- 3.6. The test demonstrates that the reporting years 2009-10, 2010-11 and 2011-12 are all considered to be abnormally negative against the control group based on the first four years’ data. See Figure 1.

Figure 1 Statistical Analysis – Close Out



Abnormal Reconciliations

- 3.7. The calculation of abnormal variations is set out in spreadsheet “Backing Calculations ENWL.xlsx” on tab “Approach C R1RF Abnormality”. This is based on calculating normal variations as a percentage of SF for each run type (using the weighted average of data from the normal period), as described in paragraph 3.49 of the decision document.
- 3.8. The calculated abnormal reconciliations applicable to the 2009-10 settlement year total 178.3GWh. This is the adjustment incorporated into the adjusted Units Exiting (Approach C) on the summary tab “Close out”.

Summary

- 3.9. The result of the Approach C calculation is shown on the tab “Close out” of the spreadsheet “Backing Calculations ENWL.xlsx”. Units exiting are calculated as the sum of the normalised SF and later reconciliation runs, all on a settlement date basis.
- 3.10. The net difference from the un-restated units exiting consists of an SF adjustment of 119.1GWh and a reconciliation adjustment of 178.3GWh, totalling 297.4GWh.
- 3.11. The calculated losses following restatement are 1209GWh, which equate to 4.94% of units distributed.

Credibility

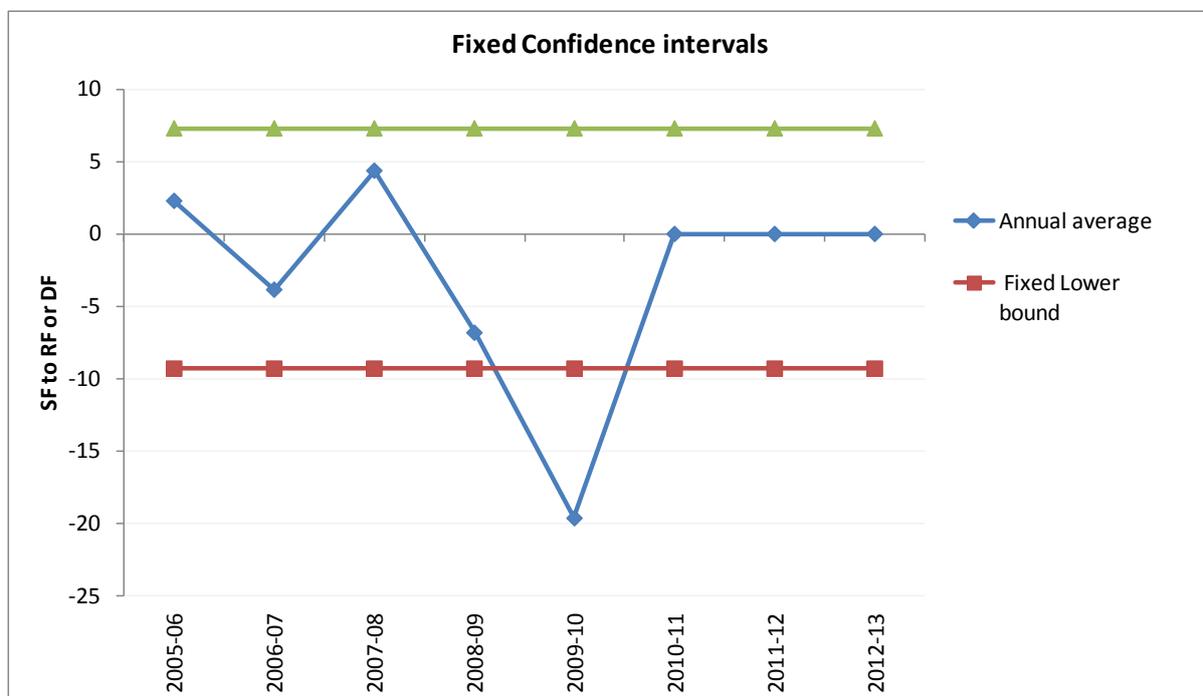
- 3.12. We believe that 2009-10 losses performance of 4.94% is credible and technically feasible, a lower loss percentage being evidenced in 2005-06. Furthermore, the result of the calculation is virtually the same as was obtained under the same methodology but using different normal periods, following the July 2012 data request.
- 3.13. We note the minded-to position for credibility criteria set out in Ofgem’s decision document, and in particular the intention that the revised criteria would be applied uniformly across all DNOs to ensure equal treatment. We further note that, based on currently published numbers, there is an example of un-restated 2009-10 loss percentage which falls below both the 95% criteria (target and two year average performance).
- 3.14. This suggests that the 95% credibility criteria are too tight and should possibly be lowered.

4. Restatement for 2009-10 Annual Incentive

Statistical Test for Abnormality

- 4.1. Annual Incentive Data, as described in paragraphs 2.19 to 2.21 above, is pasted into the tab “Statistical Analysis Annual” in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”. The data used in this test is consistent with the annual revenue returns, including the March estimates and Prior Period adjustments. No SF adjustment has been applied to the data.
- 4.2. The test demonstrates that the reporting year 2009-10 is considered to be abnormally negative against the control group based on the first four years’ data. See Figure 2.

Figure 2 Statistical Analysis – Annual Incentive



SF Normalisation

- 4.3. The adjustments to the 2009-10 annual incentive are calculated using the Approach C data and methodology, mapped to reporting date. The calculated adjustment is then applied to the actual 2009-10 reported units exiting.
- 4.4. The calculated adjustment to the Annual incentive incorporates an SF adjustment of 15.7GWh, as identified in paragraph 3.3 above.

R1 to RF Abnormal Variations

- 4.5. Similarly, the R1 to RF adjustment is calculated using the Approach C data and methodology, mapped to reporting date.
- 4.6. The calculated abnormal reconciliations applicable to the 2009-10 reporting year total 315.4GWh, and the calculated adjustment to the Annual incentive incorporates this figure.

DF Reporting Correction

- 4.7. As stated in the Introduction, and explained further in Appendix B, our 2009-10 calculation of losses included Dispute Final Reconciliations in error, which was not consistent with the 2002-03 methodology, as used both for setting the DPCR4 losses target and for reporting during previous years. We have included the removal of DF volume from the 2009-10 annual incentive, consistent with Ofgem's interim decision of 29 July 2011. This results in 2009-10 units distributed in the annual incentive being increased by 36.1GWh.

Summary

- 4.8. The result of the Approach C calculation is shown on the tab "Annual Incentive Restatement" of the spreadsheet "Backing Calculations ENWL.xlsx". The adjustment is calculated as the sum of the normalised SF and later reconciliation runs, all on a reporting date basis.
- 4.9. The total adjustment to un-restated units exiting in the annual incentive consists of:
 - An SF adjustment of 15.7GWh;
 - A reconciliation adjustment of 315.4GWh; and
 - Correction of the DF reporting error of 36.1GWh.
 - Total adjustment of 367.2GWh.
- 4.10. This adjustment would replace the interim restatement allowed under Ofgem's decision of 29 July 2011.
- 4.11. The calculated losses following restatement are 1271GWh, which equate to 5.21% of units distributed.
- 4.12. The worksheet also shows the breakdown of the adjusted units exiting into tariff baskets. The adjustment relates to NHH Profile Classes 1-4 only which is all LV and we have therefore applied the changes to LV tariff baskets only, in accordance with paragraph 4.16 of the decision document.

5. Conclusion

5.1. This report provides evidence of abnormal data contributing to the calculation of Distributed Units in 2009-10, and in accordance with the approaches set out in the Ofgem decision document, proposes adjustments to 2009-10 data to:

- Enable the close out of the DPCR4 losses incentive mechanism; and
- Restate the units distributed under the 2009-10 annual incentive

5.2. The results of the calculations are shown in the attached spreadsheets and summarised in the table below.

Table 2 Summary of Output Results

	Fully-reconciled 2009-10 data for close out		Restatement of 2009-10 annual incentive		
	Un-restated	Approach C	Original revenue return	Following Interim Restatement	Approach C
Units entering (GWh)	25,674	25,674	25,656	25,656	25,656
Units exiting (GWh)	24,168	24,465	24,018	24,335	24,385
Losses (GWh)	1,506	1,209	1,638	1,322	1,271
Loss %	6.23%	4.94%	6.82%	5.43%	5.21%

5.3. This submission constitutes a formal request for agreement to restate numbers of units distributed for the 2009-10 regulatory reporting year on a different basis of calculation from that agreed by Ofgem on an interim basis in the earlier decision letter of 29 July 2011. The submission also proposes the 2009-10 data to be used in the close out calculation, ie the units distributed in the last year of DPCR4 excluding any corrections to prior years, but with subsequent settlement corrections to the final year added in.

6. Appendices

Appendix A. List of Attachments

The following spreadsheets form part of this submission:

1. Data collection and analysis for DPCR4 losses July 2013 ENWL v1.xlsx
2. Backing calculations ENWL v1.xlsx

Appendix B. Identified Data Errors

DF Reporting Error in 2009-10 Annual Incentive

- B1. This error was identified in the review of data undertaken prior to our April 2011 submission.
- B2. Our DPCR4 reporting methodology was based on data received to RF only. As part of our investigations it was identified that the 2009-10 revenue return did not follow this methodology precisely in that data from Dispute Final (DF) reconciliations were included for the first time in 2009-10. The Supercustomer Sales Report that was used for regulatory years 2005-06 to 2008-09 was amended to reflect various improvements, which were implemented in April 2009. One of the changes made to the report was the inclusion of DF reconciliations, which were not present in the report used previously, either for setting DPCR4 losses target or for reporting during the previous years. The impact of the new report in terms of consistency with the 2002-03 losses reporting methodology was overlooked at the time the report was implemented. This resulted in 2009-10 losses being overstated by 36.1GWh.

Double-counting Error in Reconciled Data for Close Out

- B3. This error was identified in the review of data undertaken during the 2013 audit process.
- B4. During DPCR4, Profile Categories 1-4 (except unmetered) were billed through NHH (Supercustomer) billing whereas PC 5-8 were billed by our site-specific billing suite (DADS) using D10 actual meter data. Additionally, all unmetered supplies (PC0 and PC1-8) were billed in DADS.
- B5. NHH volume billed through Supercustomer was recorded in Sales Reports which showed the volume reported in each (4-4-5) accounting period. The Sales Reports were correctly filtered and did not contain any unmetered volume (the relevant LLFs do not appear in the reports).
- B6. During the same period Consumption Reports were available which showed the NHH reconciliation runs by settlement day. The SF data in Consumption Reports was periodically checked against the SF in the Sales Reports to confirm that the Consumption Reports were also correctly filtered. Unmetered PC1-4 was correctly filtered out of the Consumption Reports run over the period up to April 2010.
- B7. The reconciled data submitted in 2012 for close out contained all DADS volumes (including unmetered) in the HH Sales category. In order to obtain the NHH settlement data by month (time-shifted to create the data for input to Approach C) the NHH volume was obtained from Consumption Reports.
- B8. We have established that the filter on Consumption Reports was removed at 1 April 2010, thus affecting later reconciliation runs for unmetered data in the D30 NHH volume,
- B9. Once the filter was lifted in April 2010 the reconciliation data coming through began to contain unmetered PC1-4 hence causing the later flows to also appear in the NHH category presented in the 2012 close out submission.

- B10. The 2009-10 reconciliation data for NHH therefore did contain unmetered PC1 data which we have identified as being 17 GWh
- B11. The issue can be corrected by reducing the gross volume of PC1-4 reconciliation runs received after April 2010 by the unmetered PC1-4 volume, then calculating revised net reconciliations for use in the close out calculation.
- B12. The correction affects settlement date data in the February 2009 RF run onwards.

Appendix C. Reconciled Data Commentary

C1. The following table and notes set out the background to the data submitted onto the tab “Revised Fully-reconciled – All” in the spreadsheet “Data collection and analysis for DPCR4 losses July 2013 ENWL.xlsx”

Table 3 Commentary on Reconciled Data

Category	Data Element	Date Stamp	Comment
Monthly Purchases (Units Entering)	CVA units entering	July 2013	Minor updates to 2012 submission
	SVA units entering	April 2012	Consistent with 2012 submission
	DG Adjustment	From DPCR4 annual reports	Consistent with 2012 submission
Monthly HH Sales (HH Units Exiting)	CVA units exiting	July 2013	Minor updates to 2012 submission
	SVA demand (including PC0, PC5-8 and all unmetered)	July 2013	2009-10 unbilled removed for close out.
	IDNO demand	Reviewed during 2013 audit process	Consistent with 2012 submission
	Substation electricity	From DPCR4 annual reports	Consistent with 2012 submission
	Extra Settlement Determination	Removed	Removed
Monthly NHH Sales (NHH Units Exiting)	D0030 PC1-4 data from Consumption Reports	Reports received up to March 2013	Later data than 2012 submission. Reports received after 1 April 2010 filtered for unmetered.

CVA Data

C2. During DPCR4 CVA data was reported from our Grid Take Validation System (GTDVS), which had limited reporting functionality, and was replaced in 2010/11 by the CDCA Loading and Validation Application (CLAVA). The new system was populated with CDCA data flows for the whole DPCR4 period and provided the opportunity to validate CVA units entering and exiting for each settlement metering system at both the site and the GSP level. The outputs were reconciled against data independently sourced and aggregated by an external consultant.

- C3. This exercise identified differences between the CLAVA data and the original reports, due to the rigorous checking and updating of the standing data in CLAVA. We believe the CLAVA data to be correct (and reconciled this with the Elexon data during the 2013 audit process) and used this in the submission rather than the original reported data. It may be noted that the differences comprise similar increases to Units In and Units Out (ie the effect of netting), and thus have negligible effect on calculated losses.

SVA Units Entering

- C4. The reporting of SVA HH exports transferred from GTDVS to the DADS billing system from April 2010. Before decommissioning GTDVS, the reports for the DPCR4 period were re-run, identifying differences from the original reported data. These differences were essentially of a timing nature, and reflected the unwinding of a manual correction made in 2008/09 in respect of a reporting issue relating to the two previous years.

Units Exiting

- C5. Units Exiting data do not include the 2011 Interim Restatement.
- C6. NHH reconciliation run data is corrected for a single MPAN error in Sept/Oct 2005, with no effect on overall volume (consistent with previous submissions).