

## WPD Response To The Publication of additional information on data cleansing

WPD has a number of concerns with the data provided by suppliers to Ofgem (we also understand that other DNOs share some of our concerns). WPD sets out these concerns in full below:

1. The movement in sales in the data provided by suppliers is inconsistent with reconciled settlement data runs. As demonstrated in the table below, the data produced from the 2009/10 reconciled RF to R3, DF to RF, and DF to R3 runs, for each of the Mid East, Mid West, South West and South Wales licence areas, show a **decrease** in sales of electricity (by magnitudes of approximately 11,000 to 130,000 GWH). In contrast, the data adjustments produced by suppliers show an **increase** in sales (by magnitudes of approximately 9,000 to 118,000 GWH). There is an unaccounted difference of -251,774 GWH for the Mid East, -112,882 GWH for the Mid West, -73,033 for South West and -43,341 for South Wales.

It is simply not possible for such a large discrepancy to exist between the R3 to DF runs and the supplier data. In WPD's view, the discrepancy shows that suppliers have either provided Ofgem with data on the wrong sign (i.e on a positive sign rather than a negative sign) or that not all data has been provided by suppliers. Before Ofgem can give any credibility to the data provided by suppliers, it is essential that Ofgem ensure that suppliers have provided it with all the available data in their possession.

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
Mid East	-103,450	-29,743	- 133,193	118,581	-251,774
Mid West	-65,013	-11,800	- 76,812	36,069	-112,882
South West	-28,858	-21,794	- 50,651	22,382	-73,033
South Wales	-23,173	-10,976	-34,149	9,192	-43,341

For completeness, WPD has also attached a table setting out the difference between R3 to DF and supplier data for the 2008/09, 2007/08, 2006/08 and 2005/06 years. The reconciled settlement data for these years show similar levels of discrepancy.

2. The data provided by suppliers to Ofgem is inconsistent with the data provided by suppliers to WPD in June 2013. In particular, WPD has only been able to match 46 rows of the 4082 rows of the data previously supplied by suppliers. This is a consistency rate of 1.13%. The only plausible explanation for such a poor rate of consistency is that suppliers have, whether deliberately or not, not provided all of their data to Ofgem. As a result, the data currently provided by suppliers to Ofgem is unreliable. In WPD's view, the only way to ensure reliable data is for Ofgem to request that suppliers produce all available data, and reconcile the complete data to their previous submissions.

3. WPD understands that only four of the six suppliers have provided data to Ofgem and the data that has been provided is currently unaudited. Given the inconsistency between the reconciled settlement data runs and the data provided by suppliers it is essential that supplier data is audited by an independent auditor. It is also essential that Ofgem ensure that all available data from all six suppliers is provided to it.

Until Ofgem can be satisfied that all six suppliers have provided it with all their available data and until that data has been audited, Ofgem should not give any weight to supplier data. In its current form such data is unreliable and, in WPD's view, produces biased results.

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
2009/10					
Mid East	- 103,450	- 29,743	- 133,193	118,581	251,774
Mid West	- 65,013	- 11,800	- 76,812	36,069	112,882
South West	- 28,858	- 21,794	- 50,651	22,382	73,033
South Wales	- 23,173	- 10,976	- 34,149	9,192	43,341

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
2008/09					
Mid East	- 178,467	- 66,873	- 245,341	185,728	431,069
Mid West	- 67,211	- 18,743	- 85,954	26,056	112,010
South West	- 45,477	- 23,846	- 69,323	20,059	89,382
South Wales	- 29,896	- 8,529	- 38,425	19,729	58,154

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
2007/08					
Mid East	- 138,601	- 83,507	- 222,108	143,101	365,210
Mid West	- 1,903	- 8,603	- 10,506	- 2,031	8,475
South West	- 12,960	- 39,056	- 52,016	- 1,340	50,676
South Wales	1,379	- 8,434	- 7,054	- 15,902	8,848

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
2006/07					
Mid East	- 129,247	- 131,376	- 260,623	6,488	267,112
Mid West	- 37,178	- 34,576	- 71,753	- 558	71,196
South West	- 27,526	- 43,924	- 71,449	-	71,449
South Wales	- 14,747	- 12,143	- 26,890	- 593	26,297

	RF minus R3	DF minus RF	DF Minus R3	Supplier Data Adjustments Sent To OFGEM	Unaccounted Difference
2005/06					
Mid East	- 56,629	- 109,560	- 166,189	-	166,189
Mid West	- 12,710	- 67,071	- 79,781	-	79,781
South West	13,087	- 40,007	- 26,919	-	26,919
South Wales	- 11,015	- 17,877	- 28,892	- 302	28,590

No Of Rows Submitted By Supplier In Previous GVC Data Extraction	4082
No Of Row in the new data where a match could be found using	46
% Consistency	1.13%