

Annex A – P88 Consultation Responses

<p>1. Do you believe that P88 would better facilitate Applicable BSC Objective (c)?</p> <p>If No, do you believe it better facilitates any other Applicable BSC Objective(s), and if so which one(s)?</p>	<p>TXU: Yes, tenuously.</p>
	<p>Siemens Metering (Nottingham): Agree with the proposed DTC change but have no comments to make on MP88.</p>
	<p>Scottish & Southern: No - this Modification was proposed subject to satisfactory commercial arrangements being in place. Currently no such commercial arrangements have been put in place and we have made a similar comment in the MRA related documentation.</p>
	<p>IMServ Europe: Yes</p>
	<p>Aquila Networks: No, due to the incompleteness of P88. We do not believe it is applicable to any other BSC objective as it was raised on the assumption that it would better facilitate competition in supply.</p>
	<p>Electricity Direct: Yes, provided that the related issues outside the BSC are addressed.</p>
	<p>Npower: No. This depends critically on the legal drafting and also the extent to which related issues have been resolved before implementation. The obligation on Suppliers proposed in the Modification Proposal ‘to ensure that Equipment Owners’ consent has been obtained prior to registration’ would, if not tightly restricted to the initial registration of a Metering System, be a clear barrier to competition. We are also concerned that failure to cater in the industry process for a number of recognised scenarios (including situations where the customer owns the meter, as provided for under the Act) will lead to process ambiguity and breakdown, which could not be said to be promoting effective competition in the supply of electricity.</p>
	<p>Powergen: We do not see how this will impact on generation but it should potentially promote competition in the supply of electricity.</p>
	<p>SEEBOARD: Yes, however, this depends on the market for MAM and MAP services developing into a competitive market. Without that it is unlikely that objective (c) would be better facilitated.</p>

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	<p>Scottish Power Yes, with following qualification: Scottish Power has raised concerns with MRASCo and Ofgem over the lack of robust commercial arrangements to support REMA. Without commercial agreements, suppliers will have no knowledge of the costs associated with supplying any customer prior to completing the registration process, as the supplier will not know, at time of capture, who owns the customer’s metering assets. After capturing a customer the supplier will need to enter into an agreement with the asset owner for the sale/hire/lease of the asset without any knowledge of the charges the asset owner will levy. As a result, some suppliers or their agents may be tempted to increase their asset prices. The only other option available to the gaining supplier would be to swap the meter. Whilst this might prove less costly it will still be significantly more expensive than the current regime, as well as causing the customer inconvenience. If these concerns over commercial arrangements are tackled, then we would agree that P88 does better facilitate Applicable BSC Objective C (promoting effective competition in the generation and supply of electricity).</p> <p>NEDL/YEDL: Yes. Without P88 the industry will be unable to accommodate the MAM / MAP split.</p> <p>LE Group: No. We believe that the splitting of Meter Operation into MAP and MAM will add further complexity to the change of Supplier process. In some cases it may even prevent a prospective Supplier from being able to offer a competitive rate to the customer. This is because the premises may have technically difficult metering installed and/or a meter that requires patented software for its use.</p> <p>Applicable BSC Objective (c) is concerned with effective competition in the generation and supply of electricity, not its measurement.</p>
<p>2. Do you believe that the Requirement Specification adequately reflects the Settlement-related changes proposed by REMA?</p>	<p>TXU: Yes. It reflects the recommendations of the REMA Expert Group</p> <p>Scottish & Southern: Yes - the spec does adequately reflect changes required to Settlements to support proposed REMA changes.</p> <p>IMServ Europe: Yes</p>

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Aquila Networks:

No. There are still a number of unresolved issues under REMA. For example, 'Emergency Service' (out of hours calls) and how these should operate when a meter fault is investigated. If a fault is to be rectified by a change of meter and an asset which does not belong to the current MAP is installed, should this be changed at a later date or should this asset be sold by the provider to the current MAP. We believe all parties should adopt a standard procedure for these scenarios.

Moreover, work is still being carried out on the appropriate MRA DTC data flows, such as the DXXXX flow and a separate working group to consider D0268.

Furthermore, we believe that the receipt of the MRA DTC data flow D0151 from the Supplier to the MOA (MAM), is a significant trigger event that the devised REMA solution (process) depends upon and that this is not reflected within this Modification Proposal. It is also understood that there is to be a NHH CoP (CoP8), but that this has yet to be constructed, or even circulated within the industry for consultation/review. REMA have initiated an 'Emergency Services' expert group to consider and develop standard processes and procedures where necessary to facilitate MAP/MAM arrangements. We should be awaiting the outcome from this and review P88 in light of any recommendations that might have an impact upon it.

Electricity Direct:

Yes, provided that the related issues outside the BSC are addressed.

Npower:

No. As we understand it, the REMA working group identified a number of issues/scenarios as needing to be addressed, which have not been covered in the proposed solution.

Powergen:

At the moment we are unable to confirm that this is the case. We should have a clearer view soon.

SEEBOARD:

Yes.

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	<p>Scottish Power Yes, but with the following qualifications:</p> <p>1) On page 7 and 9, the Requirements Specification states that the Registration (normally the Supplier) should get approval from the MAP prior to installing a meter. Page 7 indicates that this is analogous to the current situation in the HH market. We are not aware of any existing HH process to allow a meter owner to determine where their meters may (or may not) be installed. We do not believe Elexon should be building this process into the BSC. If consent is to be sought prior to the installation of a meter, this should be part of the bilateral arrangements between the MAP and the MAM / Registrant.</p> <p>2) On page 9 the Requirements Specification states that "the triggers and usage of the D0150 are identical to that of any new flow that would be needed specifically to communicate the MAP ID". This is not the case, since a change of MAP (triggered by sale of meter) with no other change would not normally trigger a D0150 flow.</p> <p>3) Page 10 "As in the current arrangements, changes of MOA would be notified to NHHDC's via the D0150 flow". A change of MOA would be notified to the NHHDC on the D0148, rather than a D0150.</p> <p>4) We are unclear as to why a change is required to the BSC to inform a Customer of fieldwork. This is surely not a BSC matter.</p> <p>5) On page 14, the change to PSL110 requiring MOAs to provide information on Equipment Owners is only relevant where the Supplier does not contract directly with the MAP.</p> <p>6) We do not understand why it is being indicated that the DXXX1 and DXXX2 flows will not be included in the SVA Data Catalogue. There are numerous flows that are currently included that are not related to settlement and are under the governance of MRASCo (eg. the D0001).</p>
	<p>NEDL/YEDL: Yes.</p>
	<p>LE Group: Yes.</p>
<p>3.</p> <p>(i) If you are a Supplier, do you plan to contract separately for MAP in addition to MAM?</p> <p>(ii) If you are a Distribution System Operator, do you plan to offer separate MAP and MAM services?</p> <p>(iii) If you are a Meter Operator Agent, do you</p>	<p>TXU: (i) Not in the foreseeable future</p> <p>Scottish & Southern: (i) Yes - provided satisfactory commercial arrangements are in place.</p> <p>(ii) Yes - provided satisfactory commercial arrangements are in place.</p>

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IMServ Europe: (iv) Yes
Aquila Networks: Aquila Networks has a Licence obligation to offer both MAM and MAP and, after discussions with Ofgem, will be revising our charging statement to provide for disaggregation of the two activities. Metering Services Limited currently undertake the installation, maintenance and re-certification on behalf of the Distribution Business.
Electricity Direct: Possibly.
Npower: These are issues of commercial strategy, which we do not wish to comment on, except to say that various contractual relationship structures are possible, not all of which appear to be fully supported by the REMA arrangements as currently proposed in such a way as to ensure a robust overall process not imposing undue risks and hence commercial costs on Suppliers and hence customers. This is of particular concern since one of the stated objectives of REMA is to maximise flexibility in such arrangements.
Powergen: We are currently evaluating our strategy with regard to MAM and MAP services. At this stage no decision has been taken. However we would not wish to see any barriers introduced which would limit our commercial opportunity to contract for these services separately.
SEEBOARD: (i) At present we have made no firm decisions on this issue. This will depend upon commercial offerings we receive from Agents and parties interested in becoming a MAP. It is possible that in some circumstances we would contract separately and in others we would not. This could be on a geographic basis or depending upon commercial agreements we can put in place.
Scottish Power ScottishPower would not like to comment on these issues, as we believe that these are commercial matters and are therefore outwith both the BSC and Elexon's interests.
NEDL/YEDL: We will continue to satisfy our licence obligations. Any services outside of these that we offer will be down to our commercial judgement.

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	<p>LE Group:</p> <p>(i) No. As a Supplier we would want the MAM to take responsibility for contracts with a MAP.</p> <p>(ii) Yes. We have an obligation under the licence condition 36B2 to provide services, installations, commissioning, testing, repair, maintenance, removal and replacement of metering equipment made by any person.</p> <p>(iii) Yes.</p> <p>(iv) Yes.</p>
<p>4. Do you agree with the scope of P88, in particular with regard to the exclusion of the issues described in the Consultation Document?</p>	<p>TXU: Yes. It reflects the changes identified by the REMA Expert Group as necessary for metering competition.</p> <p>Scottish & Southern: Yes, from a settlements/BSC code perspective, P88 should exclude these issues. However, these excluded issues do require a forum to progress/resolve.</p> <p>IMServ Europe: Yes.</p> <p>Aquila Networks: No. The solution should at least include provision for 'Emergency Metering Services' (out of hours calls) within its scope. If the emergency metering service is contracted out by the MAM, how will the contractor know who the MAP is? Please also refer to response to Q2.</p> <p>Electricity Direct: Yes, but the various issues that lie outside the BSC need to be resolved before this Mod is implemented</p> <p>Npower: Yes. Most of these issues are strictly outside of the scope of the BSC, or it is otherwise reasonable to exclude them from the scope of P88 per se.</p> <p>Powergen: Yes.</p> <p>SEEBOARD: Yes</p> <p>Scottish Power Yes. We do not have any concerns over the exclusions from P88 as defined in the consultation process.</p>

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	<p>NEDL/YEDL: Yes.</p> <p>LE Group: Yes. The exclusion of issues such as emergency services and stranded assets would be better dealt with via the regulator and the REMA working group.</p>
<p>5. Do you agree that MAPs need not be accredited?</p>	<p>TXU: Yes. Accreditation is appropriate to MOAs, not to Equipment Owners [a far better term than MAP]. The Equipment Owner might be a bank, or it might be the customer. Customers should not have to be accredited.</p> <p>Scottish & Southern: Yes - on the agreement that the Metering Equipment provided by a MAP is fit for the purposes of satisfying the settlements process, the requirements of the relevant Use of Systems Agreement and the relevant Acts and Regulations.</p> <p>IMServ Europe: No. If the new MAP role is not accredited how will meter technical information be correctly transferred/audited/stored?</p> <p>Aquila Networks: Yes. Essentially this will be by commercial arrangement and as such governance up to a point can be achieved through commercial contract. However, for certain situations relating meter equipment certification, other method of governance might be an option to be considered (MAP Licences).</p> <p>Electricity Direct: ? This then puts the emphasis on the Supplier if it contracts directly with the MAP, but who would be responsible if the Supplier only contracted with the MAM? The MAM or Supplier?</p> <p>Npower: Yes. If meters have to be installed by accredited Meter Operator Agents (MAMs), then it is their responsibility to ensure all meters installed are certified. Therefore, there should be no reason for MAPs to be accredited.</p> <p>Powergen: Yes.</p> <p>SEEBOARD: Yes. At this stage we can see no need for MAPs to be accredited. It is possible that this stance could change, as further details become known.</p> <p>Scottish Power Yes, we agree that MAPs need not be accredited. The approach taken to introduce a new CoP seems a sensible way to ensure that compliant metering is used for settlement purposes. The MAP does not have "settlement critical" processes or systems, and as such it would not be appropriate to require them to be accredited.</p>

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	<p>NEDL/YEDL: Yes.</p>
	<p>LE Group: Yes. The MAM/Supplier should ensure that the meter obtained is CoP compliant and other than this the MAP has no further role in settlement processes.</p>
<p>6. Do you believe that there are any alternative solutions that the Modification Group should consider?</p>	<p>TXU: No. Best not to reinvent the wheel. The solution reflects the REMA Expert Group conclusions.</p>
	<p>Scottish & Southern: No comment, as insufficient timescales to fully assess alternative solutions for MAM/MAP proposals other than those proposed by the REMA Expert Group</p>
	<p>IMServ Europe: Yes. Suggest a ‘warranty period’, possibly one month, whereby the MAP continues with responsibility for the meter pending transfer to a MAM.</p>
	<p>Aquila Networks: No. We do not think that we have any alternative, or counter proposals that contain an alternative solution (other than the status quo). Currently we are not aware that there are any alternative proposed solutions to the REMA question other than those provided by the expert group.</p>
	<p>Electricity Direct: No.</p>
	<p>Npower: Yes. An alternative Modification without the obligation on Suppliers to ensure that Equipment Owners’ consent has been obtained prior to registration. This would avoid creating an unnecessary barrier to competition in Supply.</p>
	<p>Powergen: No.</p>
	<p>SEEBOARD: No.</p>
	<p>Scottish Power No. We do not believe there are any alternative solutions that the VAMG should consider.</p>
	<p>NEDL/YEDL: No.</p>
	<p>LE Group: No.</p>

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<p>7. Does P88 raise any issues that you believe have not been identified so far and that should be progressed as part of this Assessment Procedure?</p>	<p>TXU: No.</p>
	<p>Scottish & Southern: No comments at this time.</p>
	<p>IMServ Europe: No.</p>
	<p>Aquila Networks: Yes. Change of MAP: We believe that the requirement for the start of the process should include the new data flow from the new MAP in conjunction with the request from the supplier to change the meter to allow for the MAM to make arrangements with the MAP for the asset to be provided. If this is not outlined in more detail a request from a supplier to change the meter could be acted upon by the MAM before the details of the new MAP are provided.</p> <p>Who will control the re-certification of the meters and the cost of such a programme?</p> <p>Refer also to response to Q2.</p>
	<p>Electricity Direct: There are many situations that could arise affecting Retail competition that is covered by the BSC objectives (Promoting effective competition in the generation and supply of electricity...) and believe that these should be taken into consideration in the determination of this MOD.</p>
	<p>Npower: Yes. Since REMA is intended to facilitate flexibility in contractual arrangements, it seems perverse that a number of likely scenarios have not been catered for, with the result that Suppliers' obligations are unclear and there is a consequent risk to the accuracy of Imbalance Settlement. This applies particularly where a New Connection process has gone wrong or a customer or other 'non industry' party is the MAP. In our view the arrangements under REMA are unlikely to be robust without central-point access (on a National basis) to key data including meter type/functionality and the identities of MAP and MAM (Meter Operator) at the stage before the Supplier registers a customer, so that the Supplier knows which procedure to follow and what commercial arrangements he needs to have in place. This should be a pre-requisite for implementation of REMA.</p>
	<p>Powergen: We have not as yet delved into the modification in depth so are unable to comment whether there are any other issues that need to be progressed.</p>
	<p>SEEBOARD: No.</p>

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	<p>Scottish Power The Requirements Specification states that "the triggers and usage of the D0150 are identical to that of any new flow that would be needed specifically to communicate the MAP ID". This is not the case, since a change of MAP (triggered by sale of meter) with no other change would not normally trigger only a D0150 flow.</p> <p>There is no mention of the D0149 flow, normally sent in conjunction with the D0150 or the D0010, however the MRASCo document does show both the D0149 and D0150 flows being sent on a CoMAP. Although systems could be developed to incorporate this new Business Process, there is a risk in compounding existing problems associated with the processing of these flows. This should therefore be raised with the Mod group and discussed, together with the option of a new flow which may be more appropriate for this scenario.</p> <p>NEDL/YEDL: No.</p> <p>LE Group: Will blanket consent by GSP group area incorporate New Licenced Distribution Network Operators, as we believe there maybe an issue here (reference to question 3 iv)?</p>
<p>8. Do you have any further comments on P88 that you wish to make?</p>	<p>Scottish & Southern: The issues described in the Consultation documents, which have been excluded from the scope of P88, should be addressed prior to reaching a final decision within the Assessment Procedure. The outcome from resolving these issues may impact the P88 Modification Proposal, thus requiring further changes to the Requirements Specification and Consultation documents.</p> <p>IMServ: Who will be responsible for the comms lines where installed on the Half Hourly sites?</p> <p>Electricity Direct: Several areas that have been highlighted to be addressed outside of the BSc need to be resolved, or at the least the implementation date of this MOD to be held off until these issues have been determined. Our concern is that this MOD is implemented before these issues have been resolved.</p> <p>Npower: Since the arrangements have not yet been worked up to support all scenarios, we believe that bringing forward this Modification now was premature.</p>

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SEEBOARD:

With respect to page 7 of requirements definition in section on “New Connections”. This states that as a condition of registration consent of a MAP is required. At present on a new connection we can register a site prior to any metering being installed, using MTC 800. This blanket statement would prevent us from operating in this manner and we do not feel that P88 changes should stop this approach from being utilised.

Also if as a Supplier we do not contract directly with a MAP how are we going to know which MAP our selected MAM might use for a particular new connection until after that meter has been installed. This is highly likely to occur after we have registered that site. This definitely seems to be a case of putting the cart before the horse, unless blanket consent can be put in place with all MAPs as detailed in Q3 (iv) above. If this can be done then this becomes a non-issue and should not be included in P88 requirements. If such blanket consent is not forthcoming then it would suggest that a whole new process for new connections is required that includes this step as a precursor to any registration activity. Without this P88 in its current form could not be considered as a complete solution.

Taking this further it could be argued that on Change of Supplier such consent should be obtained from a MAP as this requirement suggests that a MAP must always know in advance which Supplier is registered to an MPAN that has a meter owned by that MAP. This could lead to problems with competition and as such P88 changes would definitely not be promoting competition.

Scottish Power:

In cases where the MAM installs a meter that subsequently has to be changed 'the next working day', this will result in both a degradation to customer service (2 visits as opposed to 1) and additional costs associated with a site visit, that will have to be applied to which party?

At the moment where the Distribution Business is both MAP & the MAM, there is a small risk of this happening, however with the introduction of the split, there is an increased probability that the spec of the meter type that the MAM may install in response to an “out of hours” call could be lower than the spec provided by the MAP – The Supplier may have appointed a particular MAP because they can provide meters with a higher spec at a lower cost. This may necessitate a second visit to change back to a higher spec meter.

LE Group:

We remain concerned that metering competition may add further complexity to the change of Supplier process. The addition of more “Agents”, more information dependencies and interfaces into the process seems likely to work against competition in Supply of electricity.

In this context Suppliers’ obligations under paragraph 6 of standard supply licence condition 7 are of great importance. This prohibits the licence holder from entering into agreements that procure metering equipment that is likely to restrict, distort or prevent competition in the supply of electricity.