

CP Progression – CP1366

Meeting Name	Supplier Volume Allocation Group
Meeting Date	3 April 2012
Purpose of paper	For Decision
Summary	This report provides details of the background, solution, impacts and industry views of CP1366 'Data Quality Obligations for Outgoing Supplier Agents'. The SVG is requested to consider the report and to reach a decision on whether to approve the CP.

1. Why Change?

1.1 Background

- 1.1.1 Standing Issue 41 'Improving the Quality & Accuracy of Data Flows' concluded that there was currently little incentive on an outgoing Supplier or Agent to resolve issues or co-operate with the other Suppliers or Agents to carry out and complete sometimes complex analysis to resolve data issues that may span many years and/or many former changes of Supplier and agent events once they were no longer associated with that metering point.
- 1.1.2 The Group agreed that to help avoid compounding data quality issues further there would be benefits for Suppliers and their Agents to work together to resolve these data issues.

1.2 What is the issue?

- 1.2.1 The Group recognised that through churn, it was quite likely that these unresolved data quality issues would continue to circulate around the industry and in the future become an issue for an outgoing Supplier/Supplier Agent if they were once again associated with the affected Metering System. It would be more efficient for problems to be addressed as soon as an issue was identified and not lead to problems which may affect customer bills.
- 1.2.2 The Group considered that the relevant BSC Procedures could be amended to require Supplier Agents to be responsible for the quality of data relating to the period of their appointment with respect to a Metering System even if data quality issues are identified after the Agent's de-appointment.

2. Solution

- 2.1 CP1366 'Data Quality Obligations for Outgoing Supplier Agents' was raised on 23 December 2011 by E.ON Energy Solutions Ltd. It proposes to require Supplier Agents to be responsible for the quality of data relating to the period of their appointment with respect to a Metering System even if data quality issues are identified after the Agent's de-appointment.

- 2.2 BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' would be amended to cover data issues relating to Non Half Hourly Data Collectors (NHHDCs) and Non Half Hourly Data Aggregators (NHHDAAs). The proposed amendments to BSCP504 can be found in Attachment A.
- 2.3 BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' would be amended to cover data issues relating to Non Half Hourly Meter Operators (NHHMOAs). The proposed amendments to BSCP514 can be found in Attachment B.
- 2.4 It was recognised that there may be some system constraints to implement this change using DTC flows, however suitable alternatives (such as flat files and emails) could be used which would require auditable data being maintained.

3. Industry Views

- 3.1 CP1366 was issued for participant Impact Assessment via CPC00707. We received 11 responses of which 7 agreed and 4 disagreed.
- 3.2 The breakdown of responses is shown in the following table. The full collated participant responses to CP1366 are available in Attachment C or on the ELEXON website [here](#).

Respondent Role	Respondent Support		
	Yes	No	Neutral
LDSOs	1	-	-
DC/DA/MOA	2	3	-
Suppliers	1	-	-
Mixed ¹	3	1	-
Total	7	4	0

- 3.3 The majority of respondents were in support of CP1366. They believe that the changes that would be introduced would help in resolving issues with data quality. It would also help to streamline the process by making the Agents talk to each other, rather than going through the respective Supplier(s).
- 3.4 However, a minority of respondents disagreed with the proposed change. These respondents felt that, while they agree with the principles put forward by this proposal, the proposed changes will not achieve the intent of CP1366.
- 3.5 These respondents believe that the obligations that CP1366 would place on Agents to co-operate are vague. Without clear requirements on what the old Agent is required to do, these obligations could be interpreted in different ways by different Parties. They believe that more clarity is needed around what

¹ Two or more of Supplier, Generator, Trader, Party agent or Distributor



errors this change would cover, how an error could be considered to be resolved and what the timescales would be for raising any issues. Some respondents who support CP1366 also feel that further clarity could be added.

3.6 These respondents note that appointments are on a Calendar Day basis, and that once a new Agent is appointed, they become responsible for all issues relating to the relevant MPAN, with the old Agent no longer having any obligations for the relevant MPAN. The old Agent would therefore have less incentive to work on these MPANs than they would those that they are currently appointed to and thus responsible for. While respondents agree that Agents should not ignore issues relating to MPANs that they are no longer responsible for, and that a reluctance to co-operate with the current Agent often makes resolving issues difficult, mandating what should be done in this situation is difficult.

3.7 Comments on the Proposed Redlining

3.7.1 The following comments were received on the proposed redlined changes to BSCPs 504 and 514:

Redline Comments			
Organisation	Doc Name & Location	Comment	ELEXON recommendation
IMServ Europe Ltd	BSCP504 1.2.5	<p>Additional paragraph to be added to support where data is not available or system constraints prevent issue to be resolved via DTC flows as per the summary document of CP1366</p> <p><i>"It was recognised that there may be some system constraints to implement this change using DTC flows, however suitable alternatives (such as flat files and emails) could be used which would require auditable data being maintained."</i></p> <p>"Where information has not been provided to the previous Agent then the new and old agent(s) along with the supplier shall work together to resolve the issue"</p>	<p>A paragraph has been inserted to read as follows:</p> <p>"Where information has not been provided to the old NHHDC then the new and old NHHDC(s), along with the Supplier, shall work together to resolve the issue."</p> <p>The redline text for BSCP504 can be found in Attachment A.</p>
IMServ Europe Ltd	BSCP514 2.2.2	<p>Additional paragraph to be added to support where data is not available or system constraints prevent issue to be resolved via DTC flows as per the summary document of CP1366</p> <p><i>"It was recognised that there may be some system constraints to implement this change using DTC flows, however suitable alternatives (such as flat files</i></p>	<p>A paragraph has been inserted to read as follows:</p> <p>"Where information has not been provided to the outgoing MOA then the incoming and outgoing MOA(s), along with the Supplier, shall work together to resolve the issue."</p> <p>The redline text for BSCP514 can be</p>



Redline Comments			
Organisation	Doc Name & Location	Comment	ELEXON recommendation
		<p><i>and emails) could be used which would require auditable data being maintained."</i></p> <p>"Where information has not been provided to the previous Agent then the new and old agent(s) along with the supplier shall work together to resolve the issue"</p>	found in Attachment B.
STARK	BSCP504 1.2.5	<p>As an AMR NHHDC we have had many occasions where the quality of data received or lack of it from previous agents has seriously delayed the ability to issue data or the need to make corrections. At times it is the reticence of deappointed agents to assist by absolving responsibility which has caused issues in correcting erroneous data.</p> <p>This has also been due at times to inability to deliver by D-Flow or our system not processing information received on a D-Flow. This amendment is therefore a positive initiative.</p>	No action is needed

4. Intended Benefits

- 4.1 Data quality issues impact the billing and settlement of millions of customers every year. Issue 41 was raised so that agreed measures could be implemented to improve the data quality of flows in the first place, and to speed up the resolution of data quality issues once these had been identified.
- 4.2 All Suppliers and Agents have teams of people who chase correct data flows every day. It can be very frustrating for these people to ask other industry participants for the information that they need and for it not to be provided because that Agent is no longer appointed. This leaves the current Supplier and Agents with known inaccurate data on their system which they are unable to get corrected. These issues can be further compounded by having to use "workarounds" to fix the data, which potentially creates more data issues that future agents would then need to resolve.
- 4.3 With the rollout of SMART metering on the horizon, Suppliers may uncover many data quality issues that they are not currently aware of, and it is critical that a robust process is implemented to ensure customers are not detrimentally impacted by the correction of these errors.

5. Impacts and Costs

5.1 The following table summarises the ELEXON effort required to implement CP1366 and the impact on market participants.

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	3 man days, equating to £720	November 2012 Release is suitable
Party Agents (DA/DC/MO)	Impacts would generally be to processes; systems are unlikely to require changing	Lead times range from zero up to 180 days from approval – November 2012 Release would be suitable
Other Market Participants	Minimal impact – Parties are generally impacted through Party Agent roles (see above)	November 2012 Release is suitable

6. Implementation Approach

6.1 CP1366 would be implemented on 1 November 2012 as part of the November 2012 BSC Systems Release, as this is the next available BSC Systems Release. Implementing CP1366 in the November 2012 Release would also allow market participants who have stated long lead times sufficient time to make the required changes to their systems and processes.

7. Recommendations

7.1 We invite you to:

- a) **AGREE** the proposed amendments to BSCPs 504 and 514; and
- b) **APPROVE** CP1366 for implementation on 1 November 2012, as part of the November 2012 Release.

Attachments:

Attachment A – BSCP504 Redlining v0.3

Attachment B – BSCP514 Redlining v0.3

Attachment C – Collated Responses to CPC00707 for CP1366

For more information, please contact:

David Kemp, Change Analyst

david.kemp@elexon.co.uk

020 7380 4303