

IA Summary for CP1192

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
CP1192	Changes to the Investigate Inconsistencies processes in BSCP502 and BSCP514 (Half Hourly only)	CPC00607	5 Agree with the CP 2 Agree with the CP upon certain conditions 3 Disagree with the CP 0 Neutral to the CP	BSCP502 BSCP514 PSL130

Impact Assessment Responses

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	None.	No	0	N/A
UDMS	✓	None.	✓	30	N/A
EDF Energy, Supplier Response	✓	Process changes and training required for a number of teams to ensure new process is followed.	✓	90	N/A
Siemens Energy Services	✓	This would have process impacts.	✓	90	N/A

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd, SP Manweb plc, SP Transmission Ltd, SP Distribution Ltd.	✓	System changes will be required to deliver compliance within this area. February 2008 Release okay.	✓	180	N/A
Stark Software Int Ltd	✓ (conditional)	<p>Stark strongly supports most of this CP.</p> <p>One issue is the latitude in allowing 5WD after the fault resolution before a D0002 is required. If a fault is cleared within 5WD, BSCP502 3.4.3.2 states go to 3.4.3.10. This allows a further 5WD before HHDC receives any notification of fault progress or resolution.</p> <p>Also, linked to this, Stark calculates HM01 on the field J0014 "Date of Action" providing it is for a date that is after the D0001 and is before the arrival date of the D0002. Where this is not the case, the arrival date of the D0002 is used. If MOPs fail to use J0014 accurately, then the tardy arrival date of the D0002 may distort HM01 and give a worse impression of performance than is the case.</p> <p>We believe that MOPs should be encouraged to resolve faults with 5WDs AND send either a D0002 or a D0005 at this point, not within a further 5WDs.</p>	X (conditional)	0	<p>The respondent has clarified that their preference would be to require the HHMOA to both resolve the fault and send the D0002 within 5WDs, or to reduce the time between these steps to 1-2 WD.</p> <p>ELEXON has confirmed with the proposer of CP1192 that the 5WDs between resolving the fault and sending the D0002 is intended to allow time for HHMOAs to return to the office from site visits before sending the D0002, and/or to allow HHMOAs to utilise manual processes such as post. The proposer believes that reducing this timescale would not allow adequate time for all of the manual processes which may be currently used to send D0002s. On this basis, no change has been made to the redlined text in this area.</p> <p>With regard to PARMs reporting, ELEXON has clarified that the PARMs standard will continue to be that the average number of WDs taken to rectify material meter faults should not exceed 15WD - as currently set</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
					<p>out in Section 3.3.9 of BSCP533 Appendix B 'PARMS Calculation Guidelines'.</p> <p>BSCP533 states that the measurement data to be used to monitor performance against this standard is the J0014 'date of action' field within the D0002, rather than the date that the D0002 itself was sent. The DTC states that the J0014 should be the calendar date on which the action was performed (i.e. the date on which the fault was resolved).</p> <p>Providing that the 'date of action' in the J0014 is on average no more than 15WD after the receipt of the D0001, the PARMS standard will therefore be met regardless of the date on which the D0002 was sent. The proposed BSCP502 obligation for HHMOAs to send the D0002 within 5WD of resolving a fault is therefore independent of the PARMS standard, and ELEXON and the proposer believe that the changes proposed by CP1192 therefore have no impact on PARMS reporting.</p> <p>ELEXON and the proposer note the respondent's comment that some HHMOAs may not be correctly populating the J0014 in accordance with BSCP533 and the DTC (i.e. they may be recording a date other than that on which the fault was resolved). Although the proposer has confirmed that they are sympathetic to this issue, they consider it to</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
					<p>be a separate issue outside the scope of CP1192.</p> <p>The respondent has confirmed that they are happy with this clarification, and therefore to withdraw their comments in respect of PARMs.</p>
IMServ Europe	✓ (conditional)	<p>Agreement with CP dependent on the following:</p> <p>Whilst we support the intention of this CP we believe that two of the new, additional processes proposed are superfluous to both Settlement efficiency and requirements and should therefore be removed.</p> <p>1) Fault Rectification Plan There are references within both BSCPs to the introduction of the use of 'fault rectification plan' in instances when the fault cannot be resolved within prescribed timescales. However, as this CP seeks to introduce more structure, in terms of both use and timeliness of the use of D0001, D0002 and D0005 flows, we believe that any and all information required should be contained within these flows, all of which include "free text" fields. The use of an additional medium to convey information (sent at exactly the same time as the flow) incurs unnecessary cost and effort. We also support the use solely of the D flow as this ensures that all relevant information can be recorded and found in a single repository. A manual process used alongside an automated DTN process introduces the risk of a delay</p>	✓	30	<p>The proposer has clarified that the intention of CP1192 is to ensure that the HHDC is aware of the detailed actions which are required to resolve the fault, and the corresponding timescales in which these actions will be undertaken.</p> <p>The proposer has clarified that they believe that the free text field within the D0005 will not always be sufficient to provide this level of detail, in which case they believe that an additional Fault Resolution Plan should be provided.</p> <p>The intention is therefore that the Fault Resolution Plan is optional, to be used where the D0005 does not allow for the required level of detail. The aim is for the plan to supplement the D0005, as the proposed redlined drafting requires high-level details to be provided in the D0005 for an audit trail even if supporting details are given in the plan.</p> <p>The proposer has also clarified that they believe the use of the Fault Resolution Plan</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
		<p>between receipt of all relevant information pertaining to a single issue and also adds potential for lack of awareness regarding the existence of this supporting information.</p> <p>2) Meter Register Reads There are references to the sending of meter register reads in the revised wording which backtracks on a BSC Change made during the June 2006 SVA Release which removed these requirements. To reintroduce these is superfluous to settlement requirements, as justified at that time.</p> <p>If this requirement has been proposed solely to cover the scenario of a meter being changed as a result of an investigation, we support the sending of reads in this instance. However as, this particular process is adequately covered in a specific section of BSCP502 (section 3.3.6) there is no need to attempt to duplicate it in the section in question.</p> <p>Impact will be management of potential increase in D0005 flows.</p>			<p>will give greater visibility to the Supplier regarding the actions which will be undertaken to resolve the fault, since Suppliers cannot currently receive the D0005 over the DTN.</p> <p>Although the Fault Resolution Plan has therefore not been removed from the proposed redlined text, amendments have been made to the text to clarify the intention.</p> <p>ELEXON and the proposer agree with the view of the respondent that the references to sending Meter register readings represent unnecessary duplication of other existing processes already within BSCP502 and BSCP514. These references have therefore been replaced by triggers to these existing processes.</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
British Energy Direct Ltd	X	<p>Clarity required on the proposed changes within the BSCPs.</p> <p>Although we sympathise with the stated aims of this change proposal, the proposed amendments to the BSCPs would appear to have a significant impact on current practices, most notably the interaction between HHDC and MOA.</p> <p>We do not believe the red-lining will deliver the aims and will introduce more uncertainty into the process.</p> <p>Currently, the existing process enables the HHDC to raise a query (where appropriate) with the MOA directly. The implications of the changes would be that this route to raise a query would be compromised and would impact on the ability to progress queries to a resolution.</p> <p>It is British Energy's view that the current proposal be reclassified as a draft change proposal with a recommendation that an expert group is formed to formulate the amendments required within the relevant BSCPs.</p>	✓	Not specified	<p>ELEXON has contacted the respondent to clarify their concerns. The respondent has clarified that they support the aims of the CP, but have specific concerns on aspects of the proposed redlined text. Further details regarding these concerns can be found in the redlined text comments table below.</p> <p>The proposer has clarified that the intention of CP1192 is that the identification of potential inconsistencies should be channelled through the Supplier such that no inconsistencies are investigated without the Supplier being aware. The proposer believes this to be consistent with Section L5 of the Code, which views the Supplier (as Registrant) as the owner of the Metering Data. However, HHDCs will still be able to request a Metering System investigation directly through the HHMOA (see proposed step 3.4.3.1 in BSCP502).</p> <p>The proposer does not believe that working group discussion of CP1192 is required, given the previous extensive discussions of CP1063 – and therefore wishes to continue to progress through the formal CP route.</p>
Scottish and Southern Energy Plc	X	<p>If the fault is not resolved within 5WDs the MOA is not mandated to keep the Supplier informed. How can Suppliers fulfil their BSC obligations in ensuring the accuracy of data entering settlements if they are kept out of the loop? If the D0002 is used the Supplier is still kept in the</p>	✓	6 months	<p>The proposed wording of step 3.4.3.3 in BSCP502 states that, if a fault remains unresolved after 5WD, the HHMOA should send a D0005 to the HHDC.</p> <p>The proposer has clarified that the intention</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
		<p>picture.</p> <p>How does this affect PARMs? It seems to give carte blanche to the MOA to resolve faults at their leisure.</p>			<p>of CP1192 is that the D0002 should only be used to close faults, whilst the D0005 should be used for providing updates.</p> <p>As Suppliers cannot currently receive the D0005 over the DTN, footnote 3 in step 3.4.3.3 of BSCP502 and endnote 4 in step 5.4.1.5 of BSCP514 require the HHDC and HHMOA to liaise with the Supplier if appropriate. Whilst the proposer has confirmed that they would be sympathetic to a separate CP being raised to investigate the possibility of Suppliers receiving the D0005, they have clarified that they do not wish to progress any DTC changes as part of CP1192 – as they believe that such changes were demonstrated to be contentious under CP1063, and were a factor in the rejection of that CP.</p> <p>The proposer has clarified that the intention of the CP is that no inconsistencies will be raised without the Supplier being aware, and that the Supplier shall always be aware if a fault remains unresolved after 15WD (since step 3.4.3.7 of BSCP502 obliges the HHDC to update the Supplier at that point).</p> <p>With regard to PARMs, ELEXON has confirmed that the PARMs standard would be unaffected by CP1192 for the reasons outlined in the response to Stark Software's comments above.</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
E.ON UK Energy Services	X	<p>This proposal would lead to a distortion of current performance reporting arrangements (PARMS HM01) as faults would still be reported against the MOA where the lack of a resolution lies with a 3rd party e.g. BT, Distributor or a customer's failure to provide access.</p> <p>In order to address this issue, amendments should be considered to the PARMS reporting to reflect the performance of the MOA in generating a D0005 within the appropriate timescales and of HHDC & Suppliers in responding to D00005s emanating from the MOA.</p> <p>The use of fax and e-mail as communication channel will not facilitate a robust audit trail.</p> <p>There is the potential for faults to remain unresolved for extended periods of time. One possible scenario is that a fault is reported on a site with no HHMO contract and a supplier is unwilling to pay the MOP charges. The MOA would be unable to de-appoint themselves and the fault would continue to be recorded as unresolved.</p> <p>Changes would be required to both systems & processes.</p>	✓	Not specified	<p>ELEXON has contacted the respondent to clarify their concerns.</p> <p>The respondent is concerned that CP1192 would prevent HHMOAs from closing faults within 15WDs where the fault had not actually been resolved. The respondent notes that faults may remain unresolved after 15WDs due to circumstances outside of the HHMOA's control (e.g. where the cause of a fault lies with a third party).</p> <p>ELEXON has clarified that the intention of CP1192 is that faults should not be closed until they have been resolved, and that the purpose of the PARMS standard is to track fault resolution at the industry level rather than HHMOA performance. ELEXON and the proposer of CP1192 believe that if faults are closed before being resolved, this will give a distorted view of the market.</p> <p>ELEXON and the proposer recognise that some faults may remain unresolved after 15WDs despite the best endeavours of the HHMOA. However, ELEXON and the proposer believe that it is appropriate for such faults to be reported as unresolved against the existing PARMS standard for the reasons outlined above.</p> <p>The respondent continues to believe that the change proposed by CP1192 is inappropriate.</p>

Organisation	Agree? (✓/X)	Comments	Impact? (✓/X)	Days Required to Implement	BSCCo Response
					<p>The original proposed drafting refers to the Fault Resolution Plan being sent by fax or email. This has subsequently been amended to 'fax, email or other method as agreed' to allow participants to use online systems if appropriate.</p> <p>The intention of the Fault Resolution Plan is that is optional, and should be used to provide any supporting information for which the free text field in the D0005 is not sufficient (with high-level detail always to be provided in the D0005 for audit trail purposes). ELEXON does not believe that the use of fax and email is unusual, as these are accepted methods of communication in BSCPs. ELEXON has confirmed with the BSC Auditor that the use of such methods in general will not prevent the maintenance of a robust audit trail. The Auditor has also confirmed that, since the Fault Resolution Plan is intended to be optional, then if it is not used this would not constitute a breach and as such would not in itself be subject to audit (the high-level details given in the D0005 would be used for audit purposes).</p>

Comments on redlined text

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
1	IMServ Europe	BSCP502	3.4.2.5	Should this read 2WD from 3.4.2.3 and not 3.4.2.4? (also applies to the equivalent process in the MOP BSCP).	<p>The proposed step 3.4.2.5 in BSCP502 requires the HHDC to trigger the Metering System investigation process, following the HHDC's investigation of the inconsistencies and if this investigation identifies that a Metering System investigation is required. The timescale for step 3.4.2.5 has now been amended to 'following 3.4.2.4' rather than 'within 2WD of 3.4.2.4', as 3.4.2.4 (the HHDC's investigation) is already within 5WD of being notified of the inconsistencies.</p> <p>ELEXON has clarified that 3.4.3.5 correctly follows 3.4.2.4, as 3.4.2.4 is the point at which the HHDC will determine if a Metering System investigation is required. ELEXON has also clarified that there is no equivalent process in the BSCP514 redlining, as this does not contain the investigate inconsistencies process since this process places no obligations on the HHMOA.</p> <p>No further changes have therefore been made to the redlined text in this area.</p>
2	E.ON UK Energy Services	BSCP514	5.4.1.6	This requires a HHDC to respond to a D0005 issued by a MOA. This requirement should carry an associated timescale.	<p>The proposed step 5.4.1.6 in BSCP514 requires the HHDC to send a decision on the further actions required to resolve the fault 'as soon as possible' after receiving the D0005.</p> <p>The respondent believes that this step should carry an associated timescale, although they do not have a particular view as to what the</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
					<p>timescale should be.</p> <p>The view of the proposer is that it would not be possible to provide a more specific timescale, since the time taken for the HHDC to send the decision will depend on the time they need to determine what action is appropriate.</p> <p>ELEXON has sought the view of the BSC Auditor on the robustness of the proposed wording. The Auditor considers that where a timescale is not prescribed then it is more difficult for them to raise as a breach. However, they note that this is not unique and there are a number of other similar examples in BSCPs. The Auditor has confirmed that in such cases they discuss the issue with the audited entity and work with them to identify what would be a business as usual level or timescale, and thus identify any backlog or unreasonable delay.</p> <p>ELEXON and the proposer therefore believe that the proposed wording is sufficient for audit purposes. No change has therefore been made to this area of the redlined text.</p>
3	E.ON UK Energy Services	BSCP514	5.4.1.4 to 5.4.1.6	The Supplier should be involved in these activities and receive copies of the flows as the issue has been raised by a Supplier and as such they have an interest in monitoring its resolution.	<p>The proposed steps 5.4.1.4 to 5.4.1.6 in BSCP514 require the HHMOA to send the D0005 to the HHDC.</p> <p>ELEXON has clarified with the respondent that the Supplier cannot currently receive the D0005 over the DTN – and that, for these</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
					<p>reason, endnote 4 requires the HHMOA to liaise with the Supplier if appropriate (there is a corresponding obligation on the HHDC to liaise with the Supplier in footnote 3 of process 3.4.3 in BSCP502). The respondent believes that a DTC change should be progressed to allow Suppliers to receive the D0005.</p> <p>Whilst the proposer has confirmed that they would be sympathetic to a separate CP being raised to investigate the possibility of Suppliers receiving the D0005, they have clarified that they do not wish to progress any DTC changes as part of CP1192 – as they believe that such changes were demonstrated to be contentious under CP1063, and were a factor in the rejection of that CP.</p> <p>On this basis, no changes have been made to the redlined drafting in this area.</p>
4	E.ON UK Energy Services	BSCP514	Note 5	Note 5 will potentially lead to only a limited Audit trail being available. The communication methods should be defined.	<p>The respondent has confirmed that their concern relates to the sending of the Fault Resolution Plan. The original proposed drafting refers to the Fault Resolution Plan being sent by fax or email. This has subsequently been amended to 'fax, email or other method as agreed' to allow participants to use online systems if appropriate.</p> <p>The intention of the Fault Resolution Plan is that is optional, and should be used to provide any supporting information for which the free text field in the D0005 is not sufficient (with high-level detail always to be provided in the</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
					<p>D0005 for audit trail purposes). ELEXON does not believe that the use of fax and email is unusual, as these are accepted methods of communication in BSCPs.</p> <p>ELEXON has confirmed with the BSC Auditor that the use of such methods in general will not prevent the maintenance of a robust audit trail. The Auditor has also confirmed that, since the Fault Resolution Plan is intended to be optional, then if it is not used this would not constitute a breach and as such would not in itself be subject to audit (the high-level details given in the D0005 would be used for audit purposes).</p>
6	Siemens Energy Services	BSCP514	5.4.1.11	This action does not appear very definitive, and therefore we have a concern about demonstrating our compliance for audit purposes.	<p>If a fault remains unresolved after 15WD, the proposed wording of BSCP514 step 5.4.1.11 requires the HHMOA to update the HHDC 'on a regular basis as agreed' until the fault is resolved. The redlined text states that the frequency of the updates will be agreed between the HHMOA and HHDC, and that the updates will always be provided through the D0005.</p> <p>The proposer believes that it would not be efficient to provide a more specific timetable (e.g. to require updates to be provided every 5WD), as this might result in participants having to send a D0005 even if there is no update to report.</p> <p>ELEXON has sought the view of the BSC Auditor in this area. The Auditor considers</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
					<p>that where matters are not prescribed in detail it can be more difficult for a breach to be identified. However, they note that they would use judgement and work with the audited entity to determine whether their actions are reasonable. The Auditor agrees that it may not be practical to simply specify that a flow is sent every 5WDs, as this may not be necessary or efficient in all circumstances.</p> <p>ELEXON and the proposer therefore believe that the proposed wording is sufficient for audit purposes. As a result, no changes have been made to the redlined text in this area.</p>
7	ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd.	BSCP502	Table 3.4.2 Page 5	Table 3.4.2 page 5 lists all the relevant footnotes, however as footnotes 2, 3 and 6 appear to be deleted there has been no attempt to renumber the footnotes either on this page or throughout the table.	<p>ELEXON has confirmed with the respondent that this is just a product of the redlining. The footnotes in the document are auto-numbered, and it is necessary to retain the original numbers for the deleted footnotes within the redlining for the purposes of showing the strike-through. The footnotes would be automatically renumbered once the redlining is accepted during implementation.</p> <p>The respondent has confirmed that they are happy with this clarification.</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
8	British Energy Direct Ltd	BSCP502	3.4.2.1	<p>From: Any participant.</p> <p>Potential for any authorised body to trigger an investigation i.e. any supplier could raise a query against a mpan even if they are not the registered supplier, nor ever have been.</p>	<p>ELEXON has clarified that references to 'Supplier' within the redlined drafting are to the current Supplier (consistent with normal BSCP conventions).</p> <p>The proposer has clarified that their intention is that any participant should be able to raise inconsistencies, providing that these are always raised through the current Supplier. The proposer believes that, in some instances, they believe it would be appropriate for previous Suppliers to raise inconsistencies with the current Supplier where they have identified (and are affected by) such inconsistencies.</p> <p>On this basis, no changes have been made to the redlined text in this area.</p>
9	British Energy Direct Ltd	BSCP502	3.4.2.3	<p>From: MOA To: HHDC</p> <p>Following the proposal through, the MOA has not been made aware of the inconsistency to respond.</p> <p>Information required: Details of inconsistencies</p> <p>Method: Telephone/e-mail</p> <p>The proposal would suggest that communication would occur in a non-standard format which would therefore have potential impacts on HHDC and HH MOA internal systems and processes.</p> <p>This would also have a significant impact on the Supplier's ability to monitor the process.</p>	<p>Following a further review of the proposed redlined text by ELEXON and the proposer, the reference to the MOA has been removed from step 3.4.2.3 of BSCP502, as the proposer has clarified that the HHMOA should notify inconsistencies through the Supplier under step 3.4.2.1. As such, the specific concern outlined by the respondent does not arise in the latest drafting.</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
10	British Energy Direct Ltd	BSCP502	3.4.2.3	<p>Action: Send notification of inconsistencies and request investigation.</p> <p>From: HHDA To: HHDC</p> <p>Information Required: D0235 Half Hourly Aggregation Exception Report</p> <p>The effectiveness of the D0235 reports in addressing the principles of the change proposal would require clarification.</p> <p>The exception reports would be raised in accordance with the settlement timetable and would not assist in the generation of a D0005 by the MOA prior to SF.</p>	<p>The proposer has clarified that they believe that it is appropriate for the D0235 to be used by the HHDA to raise inconsistencies directly with the HHDC – for example, where data is unexpectedly received for a de-energised Metering System. The proposer believes that such inconsistencies do not need to be notified via the Supplier, since the Supplier receives the D0235.</p> <p>The proposer recognises that D0235s will be generated in accordance with the Settlement timetable. The proposer has clarified that the intention of CP1192 is that the HHDA can also raise inconsistencies through the Supplier at any time under proposed step 3.4.2.1 of BSCP502. The wording of steps 3.4.2.1-3.4.2.3 have therefore been amended to clarify this intention.</p> <p>The respondent continues to question whether it is appropriate for the D0235 to be referenced.</p>
11	British Energy Direct Ltd	BSCP502	3.4.2.4, 3.4.2.5, 3.4.2.6 and 3.4.2.7	<p>When: Within 5WD of 3.4.2.2 or 3.4.2.3 as appropriate.</p> <p>Would seek to clarify the need for additional step. Currently 3.4.2.2 requires the HHDC to “investigate problem and if appropriate send request to investigate suspect metering”.</p> <p>There are merits in placing timescales within the current 3.4.2.2 to determine when a Metering System investigation is required and therefore the generation of a D0001 to the MOA.</p>	<p>ELEXON has clarified that the additional steps are intended to distinguish between process 3.4.2 (investigate inconsistencies) and new process 3.4.3 (investigate Metering System). The additional steps are also intended to deliver clarity as to the timescales in which the D0005 should be sent.</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
12	British Energy Direct Ltd	BSCP502	3.4.2.8 to 3.4.2.10	<p>Would seek to clarify the requirements of additional references.</p> <p>Currently, 3.4.2.5 actions are as follows:</p> <p>Where an investigation indicates that a fault has caused incorrect consumption to be recorded, estimate consumption data.</p> <p>Send corrected data</p>	<p>ELEXON has clarified that step 3.4.2.5 in the existing BSCP502 is now step 3.4.2.8 in the proposed redlined text, due to the insertion of earlier additional steps. The wording of the step is unchanged, except that that 'estimate consumption data' has been amended to 'estimate / correct consumption data' for clarity.</p>
13	British Energy Direct Ltd	BSCP502	3.4.3.1	<p>Action: Send request to investigate MS</p> <p>From: HHDC To: MOA</p> <p>Would propose the following:</p> <p>To: MOA and Supplier</p> <p>This would ensure that the Supplier maintains visibility of D0001s sent between HHDC and MOA.</p>	<p>Proposed step 3.4.3.1 of BSCP502 allows the HHDC to request a Metering System investigation by sending the D0001 to the HHMOA. The respondent believes that the D0001 should also be sent to the Supplier.</p> <p>The proposer agrees that this obligation could be introduced, but notes that this may represent a new requirement for some participants and may therefore be contentious. The proposer notes that the Supplier will always be informed if the fault remains unresolved after 5WDs, and questions whether there is a need for the Supplier to be aware of the fault prior to that point. No changes have therefore been made to the redlined text in this area.</p> <p>The respondent continues to believe that the Supplier should be added as a recipient of the D0001.</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
14	British Energy Direct Ltd	BSCP502	3.4.3.3, 3.4.3.6 and 3.4.3.8	<p>From: MOA To: HHDC</p> <p>Would propose the following:</p> <p>To: HHDC and supplier</p> <p>This would ensure that the Supplier maintains visibility of D0005s sent between MOA and HHDC and where appropriate, can provide additional information to assist in the resolution of the metering investigation</p>	<p>These steps involve the sending of the D0005. ELEXON has clarified that Suppliers cannot currently receive the D0005 over the DTN, and that footnote 3 in step 3.4.3.3 of BSCP502 and endnote 4 in step 5.4.1.5 of BSCP514 therefore require the HHDC and HHMOA to liaise with the Supplier if appropriate.</p> <p>Whilst the proposer has confirmed that they would be sympathetic to a separate CP being raised to investigate the possibility of Suppliers receiving the D0005, they have clarified that they do not wish to progress any DTC changes as part of CP1192 – as they believe that such changes were demonstrated to be contentious under CP1063, and were a factor in the rejection of that CP.</p>
15	British Energy Direct Ltd	BSCP514	5.4.1.1	<p>From: Any participant.</p> <p>Potential for any authorised body to trigger an investigation ie any supplier could raise a query against a mpan even if they are not the registered supplier, nor ever have been.</p>	<p>ELEXON has clarified that the existing step 5.4.1.1 in BSCP514 already allows any participant to trigger a Metering System investigation request, and that this is therefore not a new ability introduced by CP1192.</p> <p>ELEXON has also clarified that the references to Supplier are to the current Supplier, and that the proposer believes it to be appropriate for previous Suppliers to request a Metering System investigation through the current Supplier for the reasons set out in response to comment 8 above.</p>

No.	Organisation	Document	Section	Comments	BSCCo Recommendation
16	British Energy Direct Ltd	BSCP514	5.4.1.5, 5.4.1.9, 5.4.1.11	<p>From: MOA</p> <p>To: HHDC</p> <p>Would propose the following:</p> <p>To: HHDC and Supplier</p> <p>This would ensure that Supplier maintains visibility of D0005s sent between MOA and HHDC and where appropriate, can provide additional information to assist in the resolution of the metering investigation</p>	See response to comment 14 above.