Technical Assurance Outcome Report

Management and maintenance of Meter Technical Details

PAOP 1

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- Non Confidential

Contents

Overview

During November and December 2008, ELEXON visited eight MOAs (six HH and seven NHH MPIDs) to perform TA Checks on the management and maintenance of MTDs.

There are long standing concerns within the industry relating to the management and maintenance of MTDs. Issues in this area arise for various reasons such as process delays, system problems, inefficiencies of field forces working with paper records and also knowledge deficiencies. These process issues may lead to material impacts on Settlement.

The checks looked at working instructions and a sample of Metering System IDs (MSIDs) to assess compliance against the BSC and CSDs. These checks were designed to highlight issues, recommend improvements and provide assistance to the industry by looking at the opportunities to improve Meter Operation processes and associated documentation.

The samples were randomly selected where possible, where this wasn't possible MSIDs were provided by the MOAs. Samples sizes were not proportional to portfolio size and non compliances were recorded against a MSID for each instance of non compliance.

Non compliances were recorded where there was evidence of non compliance with the BSC and Code Subsidiary Documents.

Observations were recorded where evidence showed that processes / systems were not being operated as best practice e.g. where the Data Transfer Network (DTN) was not used to communicate.

All of the MOAs selected for this check worked collaboratively with us and prepared themselves well, providing the required documentation and information before the Check. The on site check went smoothly because the right members of staff were available throughout the visit. Many thanks goes to all involved in making this process run so smoothly.

MOAs
Meter Operator Agents
TA
Technical Assurance
HH
Half Hourly
NHH
Non Half Hourly
MPIDs
Market Participant Identifiers
MTDs
Meter Technical Details
CSDs
Code Subsidiary Documents
BSC
Balancing & Settlement Code
Non compliances
NCs
Observations
Obs

Outcome Summary

34 non compliances and 13 observations were raised. This report concludes with a number of recommendations (page 14), briefly these are:

- That the findings are fed into the PARMS Serial Review, looking for more meaningful ways of measuring the provision of MTDs
- That the findings are fed into the BSC Audit Review, looking at adding value to the checks made by the BSC Auditor
- That ELEXON investigates further options as to how accuracy checks may be performed on MTDs
- That the accuracy of the notification of change to other parties (D0148) is noted and fed into the Technical Assurance Check on Supplier and Supplier Agent Notifications taking place in Performance Assurance Operating Period (PAOP) 2, and
- That MOAs are encouraged to use electronic data transfer from meter to system and ensure that the commercial contracts are in place support compliance with the BSC and CSDs.

All results that were agreed with MOAs and have been provided to Associated Suppliers and the BSC Auditor for information.

These checks were initiated as part of the agreed Scope of Work and in line with Settlement Risks SR0022, SR0040, SR0027, SR0028, SR0174 and SR0175 as detailed in the Risk Operating Plan. They were undertaken in line with Technical Assurance of Performance Assurance Parties technique and BSCP535 (Technical Assurance).

PARMS

Performance & Reporting Monitoring System

SR0022 & SR0040: The risk that NHH & HHMOAs do not provide correct Meter Technical Details to the NHH & HHDCs resulting in Meter readings being misinterpreted or not collected.

SR0027 & SR0028: The risk that NHH & HHMOAs make changes to the Metering System and do not inform the NHH &HHDCs resulting in Meter readings being misinterpreted or not collected.

SR0174 & SR0175: The risk that NHH & HHMOAs do not provide correct Meter Technical Details to the LDSOs resulting in the LDSOs not receiving data of sufficient accuracy to enable the calculation of LLFs correctly.

NCs by Market Process

9% of NCs relate to HH Change of Supplier Process

15% of NCs relate to process documentation (PSL 100)

12% of NCs relate to HH New Connection Process

12% of NCs relate to Change of NHHMOA Process

9% of NCs relate to HH Concurrent Change of Supplier And Change of MOA process

9% of NCs relate to HH Change of MOA process

NB. 6% relate to HH Investigate Inconsistencies
6% relate to Change of HH DC
6% relate to NHH Change of Supplier
3% relate to Change of NHH DC
The other market processes did not evidence any NCs.
All figures have been rounded up.

15% of NCs relate to NHH Concurrent Change of Supplier And Change of MOA Process

Common Issues

Various issues were raised, either by the Check itself or as identified by MOAs. These issues all give rise to the level of risk associated with the management and maintenance of MTDs and also support the level of net significance assigned to each of the risks associated with this check. Briefly these issues are:

- MTDs issued outside the required timescales set out in BSCP514 due to;
  - Exception Management Issues
  - Delivery and Accuracy of notification of change to parties from Supplier
  - Delivery of data from other third parties – MOA and LDSO
  - Communication issues with LDSOs, and
  - The Quality of MTDs.
- Inadequate documentation

These issues are expanded and commented on in this Common Issues section. Further detailed information about the number of non compliances against market process is in Appendix A.

BSCP514

SVA Meter Operations of Metering Systems registered in SMRS.

Common Issues 1

MTDs issued outside the requirements of BSCP514

Evidence showed that all MOAs except one experienced a level of non compliance on this issue. The Settlement Risks that most closely align with this issue are: SR0022, SR0027, SR0028 and SR0040.

Of the 34 non compliances raised, 85% fell into this area and the largest portion of that into the following Market Processes:

- NHH Concurrent Change of Supplier and Change of MOA (15%)
- Change of NHHMOA (12%)
- HH New Connections (12%)
- HH Change of Supplier (9%)
- HH Change of Agent (9%)
- HH Concurrent Change of Supplier and Change of Agent (9%)
- *The remaining 19% fell into 4 different market processes*.

The evidence shows that the reasons are: a lack of proactive exception management (page 8); the delivery and Accuracy of information from Supplier (page 9); and the delivery of data from other third parties – MOA and LDSO (page 10).

It is strongly suggested that this information is fed into to the PARMS Serial Review. Additional or more meaningful measures of the timeliness and accuracy of MTDs and the associated impact on Settlement should be explored.

Improved metrics on missing or late MTDs would allow MOAs to see where to improve processes.

This information will also be fed into the BSC Audit Review.

Common Issues 2

Exception Management

In most cases there was little, if any, proactive exception management of MTDs. Few MOAs have reporting in place that will highlight MTDs where they are approaching the deadlines for issue as set out in BSCP514.

However, all MOAs have reporting in place to highlight MTDs and associated trigger flows that require manual intervention. Depending upon workload and resource availability and capability these reports can vary in length. In some cases reports were witnessed where MTDs requiring issue were outside the BSCP requirements because they require action by a third party (e.g. there may be problems with the provision of the D0148 from the Supplier or the provision of MTDs from the old MOA).

Proactive exception reporting will support fixing these problems prior to the MTDs becoming non compliant. The majority of MOAs have adequate reporting in place to enable them to manage a manual intervention process. It is preferable for processes to be fully automated, however we recognise that in the current market set up there is a need to manually manage exceptions to the automated rule.

It was witnessed in one case that the trigger to send MTDs was based on SSD, and not those requirements set out in the BSCP which can and does impact on other parties. This is a NHH issue and feeds into Settlement Risks 0027, 0040 and 0174.

Accurate and meaningful PARMS reporting assists Suppliers and Supplier Agents to monitor and manage their performance with confidence and to know where processes require improvements.

Proactive Exception Management

Good working practice would include a MOA reporting on the level of outstanding MTDs as they become 9wds overdue in the NHH market, to ensure that any delays are proactively mitigated. Currently MOAs are not prioritising workload based on days left until MTDs become non compliant with the BSC and CSDs,

D0148

Carries the Notification of Change to Other Parties from Supplier to MOA and DC.

SSD

Supplier Start Date

Common Issues 3

Delivery and Accuracy of Information from Suppliers

This area is named by MOAs as the largest contributor to them failing to get MTDs issued within the prescribed timescales or in fact, at all.

Some MOAs have reporting in place that allows them to manage this more proactively than others. In one case we saw there was no reporting related to management of the D0148, because the MOA in question was not clear on responsibilities within its business. The impact was that NCs were recorded against the MOA where MTDs had failed to be sent within the timescales set out in BSCP514 because the D0148 needed manual intervention.

Whilst MOAs cite the delivery and accuracy of information from Supplier as a large issue, where adequate or good reporting exists the process is managed sufficiently. The opposite is also true, where no reporting exists the process is not managed sufficiently. This is because the problem is not identified and therefore *can't* be managed.

Contract ID problems on the D0155 data flow from Suppliers also contributed to a MOA failing to comply with the BSC. These issues require manual intervention and it was evidenced that there are occasions where the appointment of the MOA had not progressed because the business was unable to highlight the issue, or there was confusion within the business as to where the responsibility lies. In these cases, the DC may have been successfully appointed but has no MTDs to collect readings with, directly impacting Settlement.

D0155

Carries the Appointment of Supplier Agent from Supplier to MOA and DC.

Common Issues 4

Delivery of data from other third parties – MOA and LDSO

Evidence and discussion with the MOAs showed that communication issues exist between the MOA and the LDSO, particularly where the two businesses are not owned by the same parent company. Issues are apparent in the New Connections process. In particular, it was observed that after a Supplier has sent the instruction for a New Connection to the MOA, in a number of instances there was a lack of corresponding D0170 requests for the MTDs made by MOAs.

MOAs stated that they also had issues where site technical details were requested from LDSOs but the D0215 that carries the Site Technical Details either does not arrive or has key data items missing i.e. CT Ratios (this is not a mandatory data item within the D0215).

MOAs stated that where the MOA and LDSO were not part of the same integrated company (owned by the same parent company), there were issues with getting a contact at the LDSO to talk to.

In support of the Technical Assurance of Metering technique an Expert Group is meeting (TAMEG) to look at the issues coming out of the technique, where this problem is also evident. These findings will be fed into that group for information.

MOAs also experienced a lack of MTDs coming to them as the new MOA on a Change of Meter Operator, even after D0170 requests have been sent by the new MOA to the old MOA. Whilst this issue is evident and creates a potential for impact to settlement, where reporting exists to manage such exceptions (missing MTDs, late MTDs etc), it is being managed.

Where there is no reporting there are few, if any, other detective controls in place. In these instances the issue is not being managed and this impacts on compliance with the BSC and CSDs and directly impacts Settlement.

D0170

Request for Meter Technical Details fro MOA or Supplier or DC to MOA or LDSO.

D0215

Site Technical Details from LDSO to MOA because the MOA has requested them via a D0170.

Common Issues 5

Inadequate Process Documentation

In most cases the process documentation falls short of the requirements set out in PSL100, raising the risk of broken processes, mistakes and change control difficulties. This issue feeds into all Settlement Risks associated to this Check. Only one MOA did not have any documentation, however of the thirteen MPIDs checked, nine documentation related NCs were recorded and four observations were made.

PSL100

Generic non functional requirements for Licensed Distribution System Operators and Party Agents.

Best practice documentation requires that processes are:

1. Documented so that they can be followed forwards and backwards,
2. Clear and understandable for the level of expertise expected to perform the tasks,
3. Reviewed and updated as necessary on a regular basis, and
4. Version controlled and a documented change history recorded and that they are accessible to all staff that are required to perform the task.

The checks looked at adherence to the BSC and CSDs and evidence that the documented processes were actually followed. Processes and documentation were also compared with best practice.

Process documents can be excellent training mechanisms if set up, used and updated properly. Documentation that fulfils the points above will also fulfil the requirements of a Quality Management System such as ISO 9001.

Common Issues 6

Quality of MTDs

The quality of MTDs could not be realistically checked as part of this check. PARMS Serials do tell us that there is a problem in the market, however we were not able to see this empirically with this check.

The TAA performs checks of MTDs provided by DC and Supplier against the Meter System Set up on 1% of the HH Metering System Population. The findings from those checks support the assessment that there is a poor quality of MTDs. It is important to note that most of these discrepancies do not turn out to materially impact Settlement.

Poor quality feeds directly into all Settlement Risks associated to this Check and further investigation is required to look at how and exactly what should be checked for quality, with a view to improving. This will feed into the PARMS Serial review and also the BSC Audit Review.

Recently DCP0040 (Submitting Meter Technical Details to the Technical Assurance Agent) was circulated for industry consultation. This draft change proposal suggested that the Technical Assurance Agent (TAA) (for Metering) receives all HH MTDs via the DTN and perform limited quality checks on them. The industry was split as to whether this was an acceptable change or not.

These proposed checks could look extensively at the quality of MTDs and the root causes as to why quality is failing. This data may support improvements to the BSC and CSDs, operational processes and administration to improve the quality.

Since DCP0040 was circulated, the SVG has decided that if these checks are to be undertaken, it is the TAA that should do so and with that in mind, investigation is ongoing and it's expected that a full Change Proposal will be raised in the near future.

Quality of MTDs

Meaning that MTDs are an accurate reflection of the physical Metering System set up.

DCP

Draft Change Proposal

DTN

Data Transfer Network

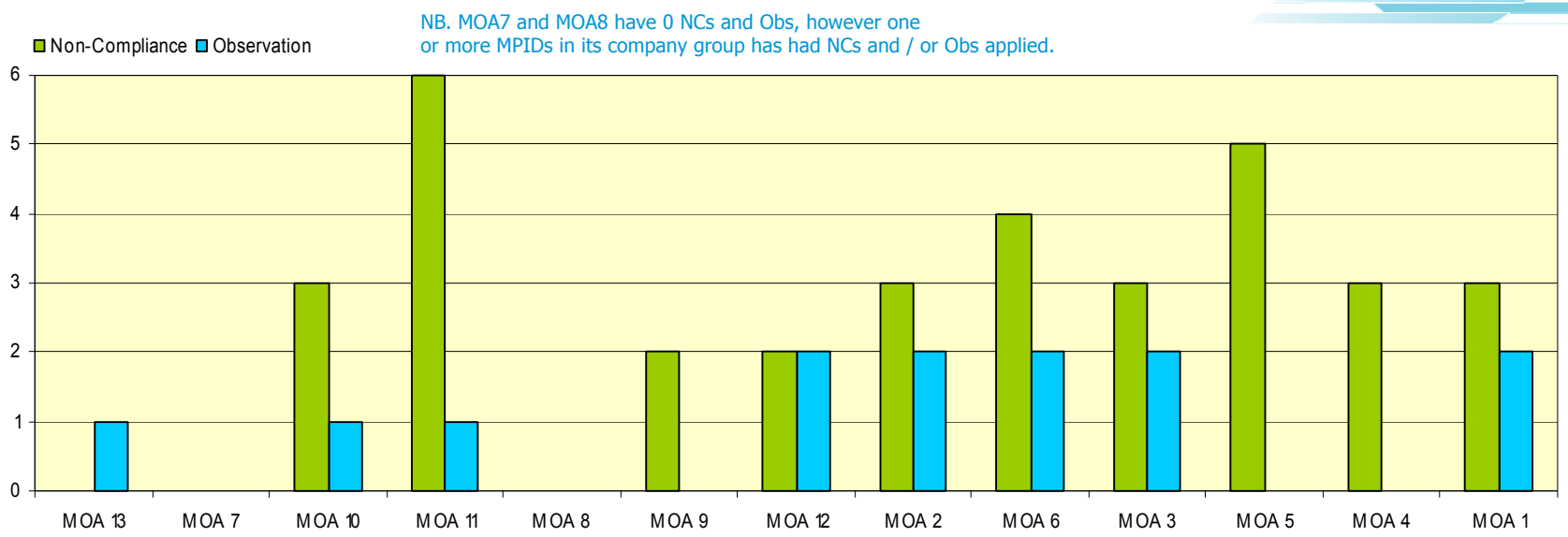
SVG

Supplier Volume Allocation Group

DC

Data Collector

Key Areas of NCs & Obs Agent Specific



Key NCs (34 raised)*

MTDs issued outside BSCP514 requirements

- Systems technical set up
- Reporting issues
- Delivery & accuracy of information from Supplier

Documentation

- Non Compliance with PSL100
- Lack of regular review and updates
- No Documentation
- No access to documentation by users

Key Observations (13 raised)*

Documentation

- Lack of regular reviews and / or updates
- Lack of controls on version / change history
- Lack of depth in the documented working instructions

Auditability

- An instance of a lack of auditability and transparency within systems of integrated parties.

** Full details can be found in appendix A*

Recommendations 1

The following recommendations are made:

» This data is fed into the PARMS Serials Review:

- To look at how the management of MTDs can be meaningfully measured, in particular:
  - Measurement of missing and late MTDs, especially looking at how to reflect that there is a difference between being 1 day late, 2 months late or never arriving, and
  - Explore the link between non provision or incorrect notifications of change to parties (D0148s) by Suppliers to the timeliness of MTDs.

» That we look at the options available to check the quality of MTDs (particularly HH where the data items are rarely standard and have a greater impact on Settlement).

- DCP0040 was recently circulated for industry consultation, since then the SVG has decided that the TAA should perform any checks on the quality of MTDs. Investigation is ongoing as to how this may be done and a new Change Proposal will be raised when the details have been explored.

» This data will be fed into the Technical Assurance Check on Supplier and Supplier Agent Notifications. This information will help design the check, to look at where the processes are falling down and allowing recommendations to be made on those findings. This check will take place in PAOP 2.

» ELEXON monitors and takes timely and robust action where Action Plans fail to deliver against milestones in line with the Error & Failure Resolution Process.

Recommendations 2

The following areas are important aspects of the process and ensuring that these provisions are efficient will impact of the effectiveness of the management and maintenance of MTDs. However these areas cannot be enforced by ELEXON.

» Electronic Data Transfer from Meter to System

- Where Meter Operators are using hand held terminals to record data on site and where this is electronically transferred to the Meter Operator system fewer delays were seen.

- Whilst this check did not adequately look at the quality of MTDs, limited human intervention and / or improved validation in processes should improve the quality of MTDs.

» Commercial contracts and contract management of Supplier Agents

- It is Supplier Agents' responsibility to ensure that their processes are compliant with the BSC and CSDs. However it is Suppliers' responsibility to ensure that the Agents they appoint are compliant with all industry codes and practise, thereby minimising the risk to both Settlement and the accuracy of Customer Data.

- This can be done with contracts that 'manage' Supplier Agents for non performance, using service levels, incentives and liquidated damages for example. Where Suppliers have commercial contracts in place with their Supplier Agents, fewer issues of timeliness are seen through PARMS reporting and industry discussion.

Appendix A
Non compliance detail 1

This table shows the number of non compliances and observations per MPID by market process.

Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
Observations	2	2	2	0	0	2	0	0	0	1	1	2	1
PSL100													
All controls devised to meet the BSC requirements should: have documented procedure and have this operation recorded.	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
The Market Participant shall ensure that all processes which affect Settlement shall be verifiable. This means that: Processes must be documented so that anyone wishing to verify the processing has a description of what it should be; all processing must	1	✔	1	1	1	✔	-	-	-	-	-	1	✔
BSC Section L – Metering													
The Registrant of each Metering System shall, in accordance with Party Service Line 180 (for CVA Metering Systems) or 110 and BSCP514 (for SVA Metering Systems): (a) establish and maintain Meter Technical Details in respect of the Metering Equipment; (b) ensure that such Meter Technical Details are true, complete and accurate; (c) provide such Meter Technical Details to the CDCA or (as the case may be) to the relevant Data Collector.	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
The principal functions of a Meter Operator Agent in respect of SVA Metering Systems for which it is responsible are: (a) to install, commission, test and maintain, and to rectify faults in respect of, SVA Metering Equipment (including, if applicable, associated Communications Equipment) in accordance with Section L; and (b) to maintain Meter Technical Details and to provide such Details, in accordance with Section L, to the relevant Half Hourly Data Collector or Non Half Hourly Data Collector (as the case may be) to enable such Data Collector to read and process data in	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

Appendix A
Non compliance detail 2

NHH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
BCSP514													
Process: Change of NHH Meter Operator Agent													
As current MOA, within 10 working days or receiving a D0170, current MOA to send D0149 & D0150 to new MOA							✔	✔	✔	✔	✔	✔	✔
As new MOA, within 10 working days of receiving D0149 & D0150 to Supplier, NHHDC & LDSO							✔	✔	✔	2	1	1	✔
Process: Change of NHHDC for existing Metering System													
Within 10 working days of receiving D0148 notifying of a change of NHHDC, MOA to send D0149 & D0150 to NHHDC							✔	✔	✔	✔	1	✔	✔
If fail to send MTDs upon receipt of D0148, then within 1 working day of receiving the D0170 from the new NHHDC, MOA to send D0149 & D0150 to NHHDC							✔	✔	✔	✔	✔	✔	✔
Process: New Connection													
Within 2 working days of receipt of D0142, MOA to send a D0170 to LDSO (to request D0215).							✔	✔	✔	✔	✔	✔	✔
Within 10 working days of Metering System being installed and commissioned send D0149 & D0150 to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔
Process: Concurrent change of Supplier and NHH Meter Operator													
As new MOA, within 2 working days of receiving D0148, send D0170 to the current MOA							✔	✔	✔	✔	1	✔	✔
As current MOA, within 10 working days of receiving D0170, send D0149 & D0150 to the new MOA							✔	✔	✔	✔	✔	✔	✔
As new MOA, within 10 working days of receiving D0149 & D0150, send D0149 & D0150 to New Supplier, NHHDC and LDSO							✔	✔	2	1	1	✔	✔
Process: Change of Supplier (if no change to Agents, then MTDs not required to be sent to DC unless requested)													
Within 10 working days of receiving a D0148, send D0149 & D0150 to New Supplier, NHHDC and LDSO							✔	✔	✔	✔	2	✔	✔
Process: Removal of Metering System													
Within 10 working days of removing Metering System or of receiving notification from the LDSO that a Metering System was disconnected, send D0150 to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔

Appendix A
Non compliance detail 3

NHH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
Process: Reconfigure or Replacement Metering System													
Within 10 working days of the replacement / reconfiguration of the Metering System, send D0149 & D0150 for new Metering System to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔
Process: LDSO replaces Metering System (for Safety reasons / Urgent Metering Services)													
Within 10 working days of receiving D0149 & D0150 from LDSO, send D0149 & D0150 to Supplier and NHHDC							✔	✔	✔	✔	✔	✔	✔
Process: Investigate Inconsistencies													
Within 10 working days of resolving problem, send D0149 & D0150							✔	✔	✔	✔	✔	✔	✔
Process: Change of Measurement Class from NHH to HH Metering System													
Within 10 working days of receiving D0170, send D0149 & D0150 to HHMOA							✔	✔	✔	✔	✔	✔	✔
Within 10 working days of receiving D0010 and D0002, send D0150 to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔
Process: Coincident Change of Measurement Class from NHH to HH and Change of Supplier													
Within 10 working days of receiving D0170, send D0149 & D0150 to HHMOA							✔	✔	✔	✔	✔	✔	✔
Within 10 working days of receiving D0010 and D0002, send D0150 to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔
Process: Change of Measurement Class from HH to NHH Metering System													
Within 2 working days of receiving the D0142 from Supplier, send the D0170 to the LDSO (to request D0215)							✔	✔	✔	✔	✔	✔	✔
Within 10 working days of NHH Metering System being installed, or HH capability being disabled, send D0149 & D0150 to Supplier, NHHDC and LDSO							✔	✔	✔	✔	✔	✔	✔

Appendix A
Non compliance detail 5

NHH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
Process: Coincident Change of Measurement Class from HH to NHH Metering System and Change of Supplier													
Within 2 working days of receiving the D0142 from Supplier, send the D0170 to LDSO							✔	✔	✔	✔	✔	✔	✔
Within 2 working days of receiving the MTDs from LDSO, send the D0170 to HHMOA							✔	✔	✔	✔	✔	✔	✔
Within 10 working days of NHH Metering System being installed, or HH capability being disabled, send D0149 & D0150							✔	✔	✔	✔	✔	✔	✔

Appendix A
Non compliance detail 6

HH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
BCSP514													
Process: Change of HH Meter Operator Agent													
As current MOA, within 5 working days of receiving a D0170, current MOA to send D0268 & Complex Site Supp Info Form to new MOA	✔	✔	✔	✔	✔	✔							
As new MOA, within 5 working days of receiving D0268 & Complex Site Supp Info Form, send to Supplier, HHDC & LDSO	1	✔	✔	1	1	✔							
Process: Change of HHDC for existing Metering System													
Within 5 working days of receiving D0148 notifying of a change of HHDC, MOA to send D0268 & Complex Site Supp Info Form to HHDC	✔	✔	✔	✔	2	✔							
Process: New Connection													
Within 2 working days of receipt of D0142, send a D0170 to LDSO (to request D0215).	✔	✔	✔	✔	✔	✔							
Within 5 working days of Metering System being installed and commissioned send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	1	1	✔	✔	✔	2							
Process: Change of Measurement Class from NHH to HH Metering System													
Within 2 working days of accepting appointment and at least 12 working days prior to CoMC, send D0170 to LDSO	✔	✔	✔	✔	✔	✔							
Within 5 working days of installing HH Metering System or invoking HH capabilities, send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: Coincident Change of Measurement Class from NHH to HH and Change of Supplier													
Within 5 working days of receiving D0170, send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: Concurrent change of Supplier and HH Meter Operator													
As new MOA, within 2 working days of receiving D0148, send D0170 to the current MOA.	✔	✔	1	✔	✔	✔							
As current MOA, within 5 working days of receiving D0170, send D0268 & Complex Site Supp Info Form to the new MOA	✔	✔	✔	✔	✔	✔							
As new MOA, within 5 working days of receiving D0268, send D0268 & Complex Site Supp Info Form to New Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	2							

Appendix A
Non compliance detail 7

HH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
Process: Change of Supplier (if no change to Agents, then MTDs not required to be sent to DC unless requested)													
Within 5 working days of receiving a D0148, send D0268 & Complex Site Supp Info Form to New Supplier, HHDC and LDSO	✔	1	1	✔	1	✔							
Process: Reconfigure or Replacement Metering System													
Within 5 working days of the replacement / reconfiguration of the Metering System, send D0268 & Complex Site Supp Info Form for new Metering System to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: LDSO replaces Metering System (for Safety reasons / Urgent Metering Services)													
Within 5 working days of replacing Metering System, send D0268 & Complex Site Supp Info Form to Supplier and HHDC	✔	✔	✔	✔	✔	✔							
Process: Removal of Metering System													
Within 5 working days of removing Metering System or of receiving notification from the LDSO that a Metering System was disconnected, D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: Investigate Inconsistencies													
Within 5 working days of resolving problem, send D0268 & Complex Site Supp Info Form if appropriate	✔	1	✔	1	✔	✔							
Process: Registration Transfers SMRS to CMRS													
At least 23 working days prior to the notified EFSD {REGI} (upon receipt of D0170 from CVA MOA) send D0268 & Complex Site Supp Info Form to CVA MOA.	✔	✔	✔	✔	✔	✔							
Process: Registration Transfers CMRS to SMRS													
As the SVA HHMOA, by the confirmed EFSD {REGI} send D0170 to request MTDs	✔	✔	✔	✔	✔	✔							
As the SVA HHMOA, within 5 working days of receiving the MTDS, send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: Change of Feeder Status – Energise Feeder													
Within 5 working days of changing Feeder Status send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							

Appendix A
Non compliance detail 8

HH Meter Operator Agent Obligations	HHMOA						NHHMOA						
	MOA 1	MOA 2	MOA 3	MOA 4	MOA 5	MOA 6	MOA 7	MOA 8	MOA 9	MOA 10	MOA 11	MOA 12	MOA 13
Process: Change of Feeder Status – De Energise Feeder													
Within 5 working days of changing Feeder Status send D0268 & Complex Site Supp Info Form to Supplier, HHDC and LDSO	✔	✔	✔	✔	✔	✔							
Process: Proving of a Metering System by Method 1,2,3 or 4													
Following installation / Reconfig, Commissioning and once all HH Metered Data retrieved or if previous proving test failed, send request for proving tests and D0268 & Complex Site Supp Info Form to HHDC	✔	✔	✔	✔	✔	✔							