

Report on Issue 49 'Change of Measurement Class (CoMC) process for Advanced Meters'

Meeting Name	BSC Panel
Meeting Date	13 February 2014
Purpose of paper	For Information
Summary	This paper sets out the discussions, conclusions and recommendations of the Issue 49 Group. The Group recommends that some changes could be raised as a result of this Issue. We invite you to note the Group's views and that Issue 49 is now closed.

Background

Electricity supply standard licence condition 12 requires that by 6 April 2014, Suppliers must not supply electricity at any Metering Point in Profile Classes 5 to 8 other than through an advanced Meter. From that date the Change of Measurement Class (CoMC) process from Non Half Hourly (NHH) to Half Hourly (HH) is likely to involve a NHH Meter which is already HH capable (assuming that the majority of Metering Systems changing from NHH to HH will be in Profile Classes (PCs) 5 to 8). In most cases a change of Meter will not be needed and in many cases a site visit by the Meter Operator Agent (MOA) will not be required. Whilst the current BSC Procedure (BSCP) processes make some allowances for a CoMC with no change of Meter, they do not fully embrace the possibility that a CoMC can take place without the need for a site visit by the MOA.

What is the issue?

The Profiling and Settlement Review Group (PSRG) raised a concern that the CoMC process was a potential barrier to elective HH Settlement. At its meeting on 1 May 2013, the PSRG agreed ELEXON's recommendation that the issues in Appendix 1 should be considered by an Issue Group. This would allow experts in the execution of the CoMC process (Suppliers, MOAs and Data Collectors (DCs)) to validate the thinking in this paper and to identify further issues/improvements.

Summary of Issue 49 discussions

The Group discussed a number of detailed issues where the CoMC process may need to change in order to better reflect how changes in metering functionality will be carried out for advanced Meters. Full details of the Issue Group's discussions and conclusions on these issues can be found in the subsections below.

As part of their discussions, the Issue 49 Group also identified two other initiatives that may have a bearing on the CoMC process but noted that these were being considered separately under other Issues:

- Interoperability (this was considered separately under [Issue 46 'Non Half Hourly Interoperability'](#)); and
- Smart Metering Equipment Technical Specifications (SMETS) and CoPs (this was considered separately under [Issue 48 'SMETS & Codes of Practice \(CoPs\)'](#)).

Issue 1: Meter exchanges

Whether or not the CoMC process will require a change of Meter for PC5-8 Metering Systems will depend on the type of Meter already installed and whether the change is elective or mandatory. An elective CoMC from NHH to HH will not require a change of Meter. A mandatory CoMC will only require a change of Meter if the existing Meter is not compliant with Code of Practice (CoP) 5¹ or above (i.e. is a CoP10² Meter only). The BSCP CoMC processes need to be clear about this distinction.

The Group queried why a meter exchange for CoP10 is not needed for elective but is for a mandatory meter. ELEXON advised that this is because the CoP10 Meter does not meet the valid requirements if mandatory, as CoP10 meters have to be under 100kW whereas CoP5 (or above) are designed for above 100kW. A member of the Group commented that they believed the issue surrounding the current non-compliance of CoP10 meters for HH 100kW trading is the main reason for a required 'unnecessary' site visit on a CoMC. They noted that a CoMC to HH elective is not a problem, but that there are significant numbers of these Meters that, due to their recorded demands meeting the 100kW threshold, require a Meter change. However, there was no appetite to explore the possibilities of making CoP10 Meters HH compliant and so it was agreed not to consider this further.

A member of the Group commented that 85% of their meters are CoP10 meters which is a significant majority. This raised a concern amongst the Group that these meters would need to be swapped out if [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) is approved and PC5-8 Metering Systems have to be allocated to Measurement Class C ('Half Hourly Metered in 100kW premise'). ELEXON advised that P272 will give Suppliers the choice to allocate PC5-8 Metering Systems to Measurement Class C or E ('Half Hourly Metered not 100kW'). The Group agreed that a change of meter will be required Metering Systems with CoP10 Meters are allocated to Measurement Class C, but not if they are allocated to Measurement Class E. They suggested that some clarification may be needed in BSCP514³ or the guidance note.

ELEXON agreed to revise and publish the guidance note to make it clearer as to when it is and is not necessary to carry out a meter exchange but no amendments would be required to BSCP514.

Issue 2: Site visits

No site visit will be needed on change to elective HH, if no change to any communications modules is required and the Meter can be reconfigured remotely or the Meter does not require reconfiguration in order for the HHDC to read the HH data. The NHH Data Retriever may already be collecting interval data from the meter, and making it available to either the contracted Customer, or the Supplier. For a change to mandatory HH, the HHMOA may need

¹ Code of Practice for the Metering of Energy Transfers with a maximum demand of up to (and including) 1MW for Settlement purposes

² Code of Practice for Metering of Energy via Low Voltage Circuits for Settlement purposes

³ 'SVA Meter Operations for Metering Systems Registered in SMRS'

to attend site to carry out a proving test, although where the communications are enabled, the HHMOA may be able to carry out a proving test remotely. The BSCP CoMC processes need to be clear about this distinction.

The Group considered the circumstance where the meter is already HH and therefore the MOA may not have a reason to carry out a site visit. They noted that this process is currently not catered for in the BSCPs.

The Group questioned whether they were to assume that commissioning has already been carried out. Some members of the Group were of the opinion that the MOAs would need to visit the site for commissioning regardless, therefore for CoMC, if the meter was not commissioned then they would have to visit the site. A member of the Group pointed out that some MOAs commission but not all, which causes potential problems. The Group considered that for NHH, new obligations could be placed on the MOA for commissioning details alongside the Meter Technical Details (MTDs) (either sent as a flow or separate). They agreed that evidence of the data and that commissioning is complete should be included in the transfer of information from the NHHMOA to the HHMOA. The Group considered whether this should be added to BSCP514 to reinforce that this information should be sent through mutual approach. It was noted that this goes further than Issue 49 and is not just a CoMC issue but could be standardised across the board.

The Group considered that at a minimum, there should be a requirement for the D0150 ('Non Half Hourly Meter Technical Details') flow to indicate whether commissioning had been carried out. The Group agreed that although advanced meters are HH capable, site visits would be required for the following –

- if a meter exchange was required;
- if a communications or SIM card change was needed;
- if the NHH meter had not been commissioned;
- or if the meter had to be locally commissioned or reconfigured.

The view of the Group was that even with a HH capable meter, it would be more likely that a site visit was needed than not. ELEXON advised that it is a CoP4 requirement that NHH meters are commissioned.

The Group agreed that when you do and do not need to carry out a site visit does not need to be included in the BSCPs, as the new MOA will be able to make this decision based on the information from the old MOA. However, ELEXON agreed to include some of the determining factors into the revised guidance document and include an explicit requirement to transfer commissioning details on NHH to HH CoMC into the draft BSCP redlining.

Issue 3: Use of the D0142 flow

The D0142 ('Request for Installation or Change to a Metering System Functionality or the Removal of All Meters') flow is used to instruct the HHMOA to replace the NHH Meter with a HH Meter (or vice versa). Whilst this is appropriate for a CoMC requiring a Meter exchange or Meter re-configuration, consideration needs to be given to what should be sent (if anything) when no site visit or remote configuration is needed in order for the new DC to take HH (or NHH) readings – i.e. when the MOA has no involvement in changing the functionality of the Meter. The Supplier might wish to leave the decision as to whether metering needed exchanging or re-configuring to the new HHMOA, in which case a D0142 would still be sent. The D0142 might also be needed as a vehicle for the Supplier

to instruct the HHMOA (e.g. via 'Additional Information' data item) to take final readings (depending on the outcome of issue 7 below). Consideration also needs to be given to the use of the D0142 as a trigger for the HHMOA to send a D0170 ('Request for Metering System Related Details') to the Licenced Distribution System Operator (LDSO).

The Group discussed how they use D0142 flows to let the MOA know that they do not need to go to site. Some Suppliers in the Group indicated that they would not already know the CoP and so would always send a D0142 flow regardless. The Group agreed that if the meter needs reconfiguring or a site visit was required, then a D0142 would be sent. They highlighted that the MOA needs to know if the meter is elective (this happens rarely), the access instructions, MTDs, current ratings, size of site etc., and would then discuss with its customers as to whether they need to do a site visit. The MOAs in the Group commented that they felt assured in receiving the D0142 flows. The MOAs in the Group also agreed that receiving the D0142 flow and additional information (normally MTDs) was adequate, although they advised that they would normally have a verbal conversation. The Group commented that this method works for low numbers but may be problematic with larger numbers.

Overall the Group agreed that it is appropriate for the Supplier to still send the D0142 flow even if no meter exchange is required. The Group noted that the MOA is best placed to make this decision, and the D0142 will act as a trigger for the MOA to do so, as it will avoid unnecessary system changes, particularly for larger numbers. They agreed that a different outcome on issue 7 might have reduced the need for the D0142, but because the conclusion on issue 7 is that the HHMOA remains central to the process, no change is required.

Issue 4: Notifying the incoming MOA of a CoMC

The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "it can be difficult for the incoming Meter Operator to identify a CoMC from any other appointment as there is no flag or code in the D0155 – although there is one, albeit rarely used, in the D0151". The BSC Auditor goes on to note that "often the D0142 flow is the point at which they are identified but only via the free text entered by the Supplier, which is extremely variable in its extent and quality".

ELEXON highlighted the fact that notifying the incoming MOA of a CoMC is not always consistent. Some members of the Group commented that they carry out the Master Registration Agreement (MRA) Working Practice 66 in discussing this with the MOA in advance. The Group considered whether a free text field should be added to the D0142 flow to indicate CoMC. They agreed that it would not necessarily be needed with a combination of MRA Working Practice 66, contract references and D0142 flows.

The MOAs in the Group advised that this is something that would be nice to have but is not worth adding in. They acknowledged the Auditor's point but agreed that the process is workable with the current low numbers of CoMC and so no change is required. Although P272, if approved, will lead to higher numbers, it is expected that the transition required for this would be managed as a project.

Issue 5: Meter Operator Agent (MOA) and Data Collector (DC) roles

One of the main difficulties with the CoMC process is that it requires high levels of manual oversight. Difficulties in executing the process often arise when the Meter replacement doesn't occur on the planned date. The agent

appointment/de-appointment processes need to be invoked ahead of the Meter replacement in order to allow time for the transfer of data necessary to allow it to take place. If the exchange doesn't take place on the planned date, HH agents are left responsible for a NHH Meter (or vice versa) or appointment/de-appointment dates need to be revised. These problems will be alleviated for those advanced Meters which don't require new communications or reconfiguration or can be configured remotely, but will persist where a site visit is still required. Although the CoMC process should be simpler where no site visit is required, this introduces new challenges in terms of the roles of the MOA and DC. The MOA and DC roles in the CoMC process may vary depending on the circumstances, so consideration needs to be given to how the Supplier should manage this. Should process differentiation be limited for the sake of simplicity or should two distinct processes be followed with a standardised method of notifying whether a site visit is required or not?

The Group commented that although site visits will still be required in a majority of cases, advanced meters will not alleviate the problem of scheduling appointments/de-appointments around a customer appointment that may need to change. The Group noted that use will still need to be made of the MRA Working Practice 66 approach – i.e. informally appointing the HHMOA to arrange the customer appointment and then formally appointing the HHMOA at a later date.

The Group agreed that the MOA and DC roles varying depending on circumstances would depend on the outcome of issue 7. As the preferred outcome to issue 7 is option (a) (MOA takes and distributes final NHH reading), process differentiation is not an issue.

Issue 6: Timing of appointments

Under MRA Working Practice 66, the Supplier informally appoints the HHMOA, notifying them of the proposed HHDC, and sending them a D0142. The formal appointment flows are not sent until the HHMOA has confirmed the CoMC. This Working Practice was developed before BSCP514, so it would be useful to understand to what extent it is still used and how it would be applied in the case where a CoMC may or may not require a customer appointment.

One of the main difficulties with the CoMC process is that agent appointments/de-appointments need to be aligned with the date of the meter exchange or reconfiguration. Where a site visit is required, a date needs to be agreed with the customer and this date may change. The Group considered various options for aligning appointments with the effective date of the CoMC. These options are described in Appendix 1. The Group concluded that there is no viable alternative to the two options currently adopted by Suppliers, as described below.

Suppliers work around this difficulty in two ways. MRA Working Practice 66 is widely used and that it is anticipated that this will continue for CoMC with advanced meters. Under the MRA Working Practice 66, Suppliers appoint the HHMOA (formally via the Data Transfer Catalogue (DTC) or informally) so that the HHMOA can determine whether a site visit is needed and arrange the visit. The remaining agents are then appointed/de-appointed once the CoMC date is firm (or has taken place). The Group commented that MRA Working Practice 66 is seen as good practice, although there is no obligation on Suppliers to use it. The alternative solution is to appoint and de-appoint agents and then back-out and send revised appointments/de-appointments if the date changes. The Group agreed that both approaches are viable and draft redlined text has been developed to recognise these two approaches in the relevant BSCP.

The Group identified a further issue arising from the timing of appointments. The MOAs in the Group highlighted that most meters are password protected and therefore they would not give out the passwords to a 'new' MOA until they were officially de-appointed. They advised that this raises security issues and creates a 'catch-22' situation, where the new MOA needs the MTD to know whether a site visit is required, but the old MOA will not send the MTD until de-appointed. This means the Supplier cannot de-appoint the old MOA until the new MOA has arranged a date for the site visit. Members of the Group pointed out that the NHH and HH agents will be the same organisation in most cases. However, one member commented that their organisation has a different NHHMOA and HHMOA so there is always a change of agent and therefore a site visit is always required.

The MOAs and DCs in the Group explained that there are three security stages outlining what the NHHMOA needs to send on to the HHMOA:

Stage 1 - Establish whether a site visit is required

There is a requirement on the NHHMOA to manually send the HHMOA high level details for them to determine whether a site visit is required or not. The HHMOA also needs to know whether the NHHMOA has already commissioned the Meter. The Group noted that some MOAs may want to dial up the Meters, to check whether they are able to read it, but that this would only require a level 1 password. The HHMOA should then inform the Supplier as to whether a site visit is required and this information will subsequently be passed onto the customer.

The Supplier will informally de-appoint the NHHMOA and appoint the HHMOA. The Supplier will ask the NHHMOA to provide the MTD D0150 and D0313 ('Auxiliary Meter Technical Details') flows using the D0170 flow (with a new Requested Action Code). The D0170 will include the identity of the HHMOA. The NHHMOA will pass full details including MTDs and necessary passwords (level 1 and level 2 details) over to the HHMOA, but will not include the Level 3 password (J1716 'Outstation Username Level 3' and J1713 'Outstation Password Level 3'). The Group agreed that this transfer of data does not have to be via DTC flows but that this can be agreed between the agents themselves. However, the information will effectively be the contents of the D0313 (excluding the level 3 password) and D0150, even if they are not formally sending flows.

Stage 2 – Request Level 3 password

If the HHMOA decides that the Meter needs to be replaced, they will not require the level 3 password. If the HHMOA decides to re-configure the existing Meter, they will request the level 3 password using a D0170 flow (with another new Requested Action Code).

Stage 3 – Formal Appointment

Once the CoMC has taken place, the Supplier can formally de-appoint the NHHMOA and send a revised D0155 ('Notification of Meter Operator or Data Collector Appointment and Terms') to the HHMOA if the CoMC did not take place on the planned date. The HHMOA can now change the level 3 password, as the old MOA has been de-appointed. As a result, informal arrangements no longer exist.

The Group agreed that there is an issue in that if a NHHMOA is formally de-appointed before a HHMOA is formally appointed, then NHHMOA would still be responsible under the Meter Point Administration System (MPAS). However the Registration System requires for MOAs to be appointed at all times. The Group agreed that they do not normally appoint/de-appoint concurrently but slightly in advance.

The Group agreed to add the staged transfer of the technical information/passwords. The Group also agreed to remove the reference to permanently disabling the HH functionality on change from HH to NHH.

ELEXON agreed to draft a Change Proposal (CP)(s) and redlined text for CoMC in respect of the agreed solutions to these issues.

Issue 7: Final readings

Where a meter exchange is required, this is carried out by the HHMOA. The HHMOA passes the final NHH readings to the NHHMOA in order to pass onto the NHHDC. If no metering or communications changes are needed and the HHMOA has no involvement in the process, the final NHH readings could be taken by the HHDC. These readings could be transferred from HHDC to HHMOA to NHHMOA to NHHDC. This would provide consistency with CoMC events where a meter exchange is required, but is arguably inefficient. An alternative would be a direct transfer of the D0010 ('Meter Readings') flow from HHDC to NHHDC (not currently supported by the DTC) or transfer via the Supplier. Another option would be for the NHHDC to take the final reading(s). This would be simplest in terms of execution, but might present difficulties in terms of continuity between the final reading taken by the NHHDC and the initial HH readings taken by the HHDC (unless a midnight standard were feasible).

The Group discussed whose responsibility it should be to take the final reading(s), as a number of agents may have access remotely. The Group highlighted the interoperability issues (e.g. with communication issues) which result in MOAs swapping out the meter. They acknowledged that in the event of a communications failure, a local reading may be required and the HHMOA would be the obvious candidate to take it.

The Group noted that the current process of the readings being transferred from the meter to HHMOA to HHDC to NHHDC involves a number of 'hand-offs' and as such, considered a number of alternative options. These options are described in detail in Appendix 2.

Overall the Group agreed that option (a) is the preferred outcome. The Group concluded that the HHMOA was the best candidate where a site visit is required, which will still be the case for many instances of CoMC. Having separate processes for when a site visit was needed/not needed was not thought to be desirable. The Group therefore did not recommend a change to the current process in this respect.

Issue 8: Transfer of readings

The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "One of the requirements is that the incoming MOA is required to send the final meter register readings to the outgoing MOA on a D0010 flow, or if the reading is not available a D0002 ('Fault Resolution Report or Request for Decision on Further Action') flow should be sent. However the principal method of communication between these Agents, the Data Transfer Network (DTN), does not support the sending of these flows between MOAs".

Some Group members expressed the view that formalising a MOA to MOA instance for the D0002 and D0010 flows in the DTC would be advantageous. Other members of the Group suggested that a manual process could work for low numbers of CoMC and that for higher numbers (if P272 is approved), a project-type approach would be used.

As the Group favoured option (a) for Issue 7, they agreed that the MOA to MOA instance of the D0002 and D0010 flows in the DTC need to be formalised. The Group agreed for ELEXON to draft a DTC CP.

Issue 9: Missing readings

BSCP514 7.1.21 and BSCP504 3.3.1.8 require that the NHHDC should request missing final readings from the NHHMOA and the Supplier. Depending on the solution to issue 7 above, the options for chasing missing final reads may vary depending on which participant has responsibility for the obtaining the final reading(s).

The Group agreed that this issue also relates to issue 7, and noted that if the responsibilities had changed for readings, then the BSCPs would also need to change. However, as the Group agreed that the preferred outcome to issue 7 was option (a), responsibilities would not have to change.

Issue 10: Continuity of readings

Where a Meter exchange is required, the HHDC has to submit zero readings for those Settlement Periods on the day of the exchange (which will have an impact on performance, if flagged as estimates). The energy consumed in those Settlement Periods will be taken account of by the final reading on the NHH Meter. Where there is no Meter exchange, and the Meter has been recording HH data, the HHDC should be able to take HH readings from midnight start of day. Processing these readings will result in double-counting unless the Meter (like SMETS Meters) stores midnight cumulative reads.

An alternative processes, adopted by at least one Supplier, is to appoint the HHDC from the day following the CoMC, leaving the NHHDC appointed on the day itself. This resolves the NHH side of the issue, but impacts Settlement to the extent that no usage is recorded for the time period between the Meter exchange and midnight on that day.

The Group agreed that it would be preferred for the HHDC to have data for the whole day. This would mean that the final NHH read would need to be a midnight read to avoid double-counting. In some cases the advanced meter (like a SMETS meter) may store midnight reads, but this would not always be the case.

One DC in the Group advised that they provide readings from midnight, regardless of when the HH meter was installed, and estimate missing half hours using subsequent data. Another DC in the Group explained that there are four scenarios for the first day of HH data on a CoMC site:

- If there is zero actual data from the meter with no flags;
- If there is value actual data from the meter then these will be processed;
- If there is zero actual data from the meter with alarm flags - if they can identify the site as CoMC or new connection (no previous meter) when validating this data, then they would estimate zeros or accept the zero actual data; or
- If there is no data from the meter. In this scenario the site would automatically be estimated according to the BSCP hierarchy, most likely resulting in value estimates. The DC would then investigate estimated data prior to SF and at this point if the site can be identified as CoMC or new connection (no previous meter), then they would re-estimate the data as zero.

Both DCs agreed that going forward, a midnight read would be preferable, but that it would be problematic for the NHHDC to obtain a midnight read (unless the Meter stored midnight reads, in the same way that SMETS Meters



can). The Group agreed that the industry should try to avoid double counting as it was noted that double counting of energy by both the NHHDC and HHDC would result in the customer being billed twice for the energy.

The alternative to a midnight closing read is for the HHDC to submit zero values from midnight to the time of the CoMC. There is an existing requirement on the HHMO to provide an initial cumulative read for the HH Meter to the HHDC. It is proposed that a note should be added to BSCP514 to the effect that the initial register reading should include the time as well as the date of the reading. This will allow the HHDC to estimate zero for Settlement Periods prior to the meter replacement/re-configuration.

ELEXON also carried out some calculations on the materiality of the issue based on possible numbers should P272 be approved. The calculations take an average energy value for half a day for each Suppliers' PCs 5 to 8 customers. This is designed to take into account the double counting of energy between midnight and the re-configuration of the meter to HH (on the assumption that the advanced Meter has recorded half hourly data for the whole day). The error is then redistributed according to Non Half Hourly market share. The result shows that worst affected Supplier would pay £221k. Further details of these calculations can be found in Appendix 3.

Issue 11: Re-dating of readings

BSCP514 7.1.8 requires the NHHMOA to re-date the final readings from the HHMOA to the previous day. This was introduced to avoid the constraint in some NHHDC (or NHHMOA) systems whereby a reading dated after their appointment end-date cannot be processed. It would be useful for the Issue Group to establish whether these constraints remain, whether the workaround is successful and whether advanced Meters provide an opportunity to make this transition more seamless.

The Group commented that the constraints do remain and so NHHMOAs should continue to re-date the final readings from the HHMOA to the previous day. They therefore agreed that no change is required.

Issue 12: Proving tests

BSCP514 7.1.16 and 7.2.16 require the HHMOA to 'prove MS'. CoP10 Metering Systems are exempt from proving tests (as defined in BSCP502⁴), so a clarification is needed to this effect.

Some Group members commented that they would like to see proving tests for elective HH, otherwise, for consistency purposes, a housekeeping CP is needed to reflect the previously approved CoP10 changes (CoP10 Metering Systems are exempt from proving tests as defined in BSCP502) into BSCP514. A member agreed that they would consider raising a CP in due course to resolve this issue.

Issue 13: Use of D0150 and D0313

BSCP514 7.1.19 would benefit from clarification that 'Notification of Meter removal' (via the D0150 flow) is 'as required', and that the D0313 is only required when the Metering Equipment (including communications devices) remains in situ. Consideration needs to be given to whether a D0150 should be sent to the HHMOA, where the

⁴ 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'

same Meter is being used, to help the HHMOA to construct a D0268 ('Half Hourly Meter Technical Details') flow. The BSC Auditor has raised (or is considering raising) issues in this area.

The Group noted that this issue related to issues 5, 6, 7, 8 and 9. If the meter is removed, the HHMOA will need to notify the final read and inform the NHHMOA of removal. The NHHMOA will need to send a D0150 to notify removal to the NHHDC, Supplier and LDSO. However, no D0313 would need to be sent. If the meter is not removed, the HHMOA will need a D0150 and a D0313 to help construct the D0268.

The Group noted the Auditor's comment but agreed that it would be useful to have a notification of removal, even if there had been no meter exchange. This was for three reasons: to allow Supplier billing and other systems to close NHH accounts; to facilitate the matching of the final NHH readings with a 'removal' event; and to notify MAPs who may have different leasing arrangements for HH and NHH meters. It was also noted amongst the Group that sending the D0150 flow would not be a major inconvenience for recipients who did not need it. The Group agreed that the process of the NHHMOA sending the D0150 to the HHMOA should be standardised, including a requirement for why the flow needs to be sent, to ensure that the same process is being followed throughout industry.

Issue 14: Sharing of Meter Technical Details (MTD)

The BSC Auditor has noted in Market Issue 1640 ('Lack of clarification regarding MOA BSCP requirements') that "the process requires the sharing of Meter Technical Details but often MOA systems are not configured to accept those flows which can then hamper the process, e.g. a HHMO will send a D0268 to a NHHMO or a NHHMO will send a D0150 to a HHMO".

The Group suggested that the most radical solution would be to have one set of MTDs in both the NHH and HH markets. However, the Group agreed that this would be an extremely large change so they should continue to manage the details. The Group acknowledged that this management is easier with lower numbers but that with high numbers (which could result from the approval of P272), then they would have to project manage the details instead.

The Group noted the Auditor's comment but agreed that they could not do anything to resolve this issue without doing something radical and expensive. As there was no appetite to look at this issue now, they agreed for no change to be made.

Issue 15: Concurrent service cable upgrades

An issue has been raised under the MRA about the situation where a CoMC occurs at the same time as an upgrade to the service cable due to an increase in load capacity. Customers may require the existing NHH supply to co-exist with the new HH supply for a period of time before being switching completely to the HH supply. This is arguably a new HH connection, followed by a NHH disconnection, rather than a CoMC, but guidance about which process should be followed may be useful.

The Group noted that where there are two distinct supplies, two MPANs should be registered. Where the same MPAN is used, the cable upgraded and the metering changed in a single site visit would be classed as a CoMC. They highlighted that the 'grey area' is when the customer has old and new supplies running in parallel for a period

of more than a Settlement Day. It was therefore agreed that if there are two parallel cables for more than 24 hours, then two MPANs are needed.

ELEXON agreed to incorporate some advice into the guidance note. One member of the Group suggested that it was emphasised that the LDSO should disconnect the redundant service in a timely fashion.

Issue 16: Notification of 100kW sites to the Panel

The P0028 100kW Demand Report is used by NHHDCs to report potential 100kW sites to the Supplier. BSCP504 3.4.1.8 requires the NHHDC to send the P0028 100kW Demand Report to the Panel. It is unlikely that NHHDCs are sending these reports to the Panel or that the Panel would know what to do with them if received. This requirement could be removed.

BSCP504 3.4.1.8 states that each month, when 100kW demand is identified by a NHHDC, they must produce and send to the Panel and Supplier a report detailing the occurrence. They do this by sending a P0028 '100kW Demand Report' flow.

The Group highlighted that the P0028 100kW Demand Report has thousands of sites on it and as such is meaningless for the Panel to view in that form. The Group agreed that the requirement should be removed.

Issue 17: Guidance Note on Change of Measurement Class

ELEXON's 'Guidance Note for Change of Measurement Class and Change of Profile Class' was last updated in September 2008. Further updates may be required as a result of the Issue Group's conclusions.

ELEXON noted that it had started updating the guidance note on CoMC which was distributed to the Group for comment. Following the comments received and updates agreed in relation to issues 1, 2, 10 and 15 above, ELEXON will amend and finalise the guidance note.

Issue Group's Conclusions

The Group agreed that it would be useful and of value to Parties to raise a CP (or CPs) to:

- Clarify the appointment process options;
- Introduce a two-stage process for the transfer of Auxiliary Meter Technical Details (with and without the Outstation Level 3 password) (which will also require a change to the Data Transfer Catalogue);
- Introduce a requirement on the HHMOA to include the time of the initial register reading sent to the HHDC as well as the date;
- Include an explicit reference to the transfer of commissioning details;
- Clarify that a notification of removal of the NHH Meter should be sent whether the meter is physically removed or not;
- Remove the requirement to disable HH functionality on HH to NHH CoMC;

- Remove the requirement for NHHDCs to send the P0028 100kW Demand Report to the Panel.

The Group also agreed to raise a DTC Change to:

- Allow the D0002 and D0010 flows to be sent between Meter Operators.

Subject to ELEXON identifying willing "sponsors" for these changes, they will be targeted for implementation as part of the November 2014 Release.

It was also agreed that a CP in relation to Proving Tests would be raised in the near future.

The Group also believed that a CP needs to be raised to add a commissioning flag to the D0150 flow. However, the Group acknowledged that this was not just a CoMC issue and as such would need to be standardised across the board. A Party may look to raise a CP to resolve this issue in the near future but it will not be included as part of the scope of the main Issue 49 CPs.

Recommendations

We invite you to:

- **NOTE** the Issue 49 Group's discussions and conclusions;
- **NOTE** the Group's recommendation that CPs will be raised to address the issues identified; and
- **NOTE** that Issue 49 is now closed.

List of Appendices:

Appendix 1: Issue 6 – alternative options for aligning appointments with the effective date of the CoMC

Appendix 2: Issue 7 – alternative options as to who could take the final reading(s)

Appendix 3: CoMC Materiality Calculations

Appendix 4: Issue 49 Attendees List

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Appendix 1: Issue 6 – alternative options for aligning appointments with the effective date of the CoMC

To address the issue, the Group discussed different ways of aligning the following:

- A - CoMC effective date (MPAS/ Supplier Meter Registration Service (SMRS));
- B - site visit date; and
- C - agent appointments/de-appointments.

Option 1 (Aligning A-B-C- using retrospective flows): The Group agreed that this option is difficult as it involves aligning all three, including the site visit date, which is moveable. For this approach to be effective the appointment and de-appointment processes would be carried out informally offline and then the formal appointment/de-appointment flows sent retrospectively (i.e. the MRA Working Practice 66 approach).

Option 2 (Aligning A-C – Fixed CoMC effective date and agent appointments): The Group agreed that this option means that the MOA does not have to worry about the date of the site visit. They noted that this process only works if there is no delay in making an appointment and if the meter is recording HH data that can be collected within a reasonable timeframe. However, the Group agreed that it often depends on the customer as to when a site visit can be carried out. There is no incentive for the customer to make an appointment, if they are already unhappy about having to have a HH meter installed. A member of the Group noted that only two out of ten meters are re-configured on CoMC, and if meters are being swapped then this will create a gap. The Group agreed that this is a huge drawback as this option means that parties have to wait until an MOA contract has been made before starting the process.

Option 3 (Aligning A-B – Fixed agent appointments, retrospective CoMC effective date): The Group was concerned that this option creates issues with the readings being passed around and poses the question as to who has ultimate responsibility for the meter. The Group ruled this out as a possible option.

Option 4 (Aligning B-C – Fixed CoMC effective date, retrospectively align agents and site visit): The Group agreed that this option would not work and so ruled it out as a possible solution.

Option 5 (No alignment): The Group agreed that this option would be prone to confusion and so ruled it out as a viable solution.

Appendix 2: Issue 7 - alternative options as to who could take the final reading(s)

The Group considered various new options as to who could take the final reading(s):

Option (a) Readings could be transferred from the meter to HHMOA to NHHMOA to NHHDC: The Group agreed that this option has the benefit of being the most consistent with current process. The Group questioned whether there is any value in consistency with the process for sites without advanced Meters (on the assumption that most NHH to HH CoMC will be for PCs 5-8). However, it was noted that even where advanced Meters are installed, site visits by the HHMOA will still be needed in many cases.

The Group identified that a disadvantage of this option is that the HHMOA to NHHMOA flow is not supported by the Data Transfer Catalogue (DTC) and Suppliers often have to request readings from the HHMOA, as it is evident that the manual HHMOA to NHHMOA flow has not been sent. However, this is true of all options involving a HHMOA to NHHMOA transfer, including the current process. Discussions regarding a DTC change for a MOA to MOA flow can be found under issue 8.

Option (b) Readings could be transferred from the meter to HHDC to HHMOA to NHHMOA to NHHDC: There was no support amongst the Group for this option as it adds additional complexities in passing the read between every participant involved. The Group noted that this option could also require a standard MOA to MOA process and a change to the DTC.

Option (c) Readings could be transferred directly from the meter to the NHHDC: The Group agreed that this option is the most efficient but is least aligned to the current process. They also noted that this option does not fit with a concurrent Change of Supplier (CoS). The Group was supportive of this option in its own right and combined with option (f) below, as it is direct and requires no data transfers. However, the Group had concerns over timings which links this option with issue 6.

The Group questioned whether the de-appointment date is the right date for the MOA to be taking the reading. If the meter is a dumb meter, the HHMOA would still have to take the reading (as is the case now) but if it is an Automatic Meter Reading (AMR) meter, the Group agreed that there is still a good reason to think that the HHMOA would go to the site anyway to take the read. They agreed that having the NHHDC take the reading when comms were available, but the HHMOA take the reading if a site visit was required, may cause confusion as to who should be taking the read.

Option (d): The HHMO could provide the final NHH reading to the Supplier to pass to the NHHDC: The Group agreed that this option does not fit with a concurrent CoMC and CoS. They highlighted that this option involves one less party but noted that this option would introduce a new relationship which does not exist anywhere else.

Option (e): The HHMOA to obtain the reading(s) and pass directly to the NHHDC: The Group suggested an option for the HHMOA to obtain the reading(s) and pass directly to the NHHDC. They noted that the problem with this option is that the HHMOA has no contractual or BSC relationship with the NHHDC.

Option (f): The NHHMO would also be able to take the reading and pass to the NHHDC: The Group noted this option for completeness but did not view it as a possible option.

Option (g): Supplier to obtain and distribute the reading(s) using the agent(s) of their choice: The Group suggested option (g) as an additional option in putting a high-level obligation on the Supplier. They



commented that to an extent, this is the current process in place as a vast majority actually have a reading but the read is not always passed on. The Group acknowledged that leaving the obligation on the Supplier may be difficult on concurrent CoMC/CoS.

Appendix 3: CoMC Materiality Calculations

Please note that the Supplier IDs have purposely been made anonymous. All volumes are in MWh.

Supplier ID	Annual NHH	NHH Market Share	Annual PC5-8	Daily PC5-8	Half-Day Error	Re-Paid via GSPGC	Net Error	@£57/MWh
STAR	12931510	7.92%	4150240	11371	5685	1811	3875	£220,858
MOON	4153431	2.54%	1823500	4996	2498	582	1916	£109,236
DARK	21329553	13.06%	2672610	7322	3661	2986	675	£38,460
BLUE	1460858	0.89%	638527	1749	875	205	670	£38,199
SHOE	2502474	1.53%	539093	1477	738	350	388	£22,122
BOOT	551388	0.34%	264903	726	363	77	286	£16,284
FOOT	735995	0.45%	278641	763	382	103	279	£15,883
HEAD	314779	0.19%	209286	573	287	44	243	£13,829
HAIR	581327	0.36%	226650	621	310	81	229	£13,058
CLIP	283684	0.17%	164742	451	226	40	186	£10,599
BLIP	324142	0.20%	116635	320	160	45	114	£6,520
SLIP	5288615	3.24%	596637	1635	817	740	77	£4,380
TRIP	1352324	0.83%	182222	499	250	189	60	£3,436
WIRE	65362	0.04%	50152	137	69	9	60	£3,394
TYRE	264587	0.16%	45286	124	62	37	25	£1,424
CARS	36349	0.02%	21353	59	29	5	24	£1,377
MARS	21097	0.01%	15727	43	22	3	19	£1,060
BARS	57157	0.04%	10743	29	15	8	7	£383
BEER	6718	0.00%	3153	9	4	1	3	£193
TALL	1989	0.00%	1805	5	2	0	2	£125
CALL	164458	0.10%	17541	48	24	23	1	£57
FALL	4	0.00%	0	0	0	0	0	£0
FELL	11	0.00%	0	0	0	0	0	£0
BELL	5044	0.00%	341	1	0	1	0	-£14
RING	271751	0.17%	24981	68	34	38	-4	-£218
ROAD	60877	0.04%	0	0	0	9	-9	-£486
TOAD	73510	0.05%	102	0	0	10	-10	-£579
CODE	83201	0.05%	0	0	0	12	-12	-£664
WORD	230156	0.14%	199	1	0	32	-32	-£1,821
BIRD	259768	0.16%	188	1	0	36	-36	-£2,058
BATH	994003	0.61%	47496	130	65	139	-74	-£4,224
ROOM	572893	0.35%	390	1	1	80	-80	-£4,542
TOMB	16371567	10.03%	1598873	4380	2190	2292	-102	-£5,812
DOOM	753271	0.46%	341	1	0	105	-105	-£5,985

Supplier ID	Annual NHH	NHH Market Share	Annual PC5-8	Daily PC5-8	Half-Day Error	Re-Paid via GSPGC	Net Error	@£57/MWh
DOME	808720	0.50%	441	1	1	113	-113	-£6,420
ROME	1236101	0.76%	103	0	0	173	-173	-£9,857
HOME	3196887	1.96%	151824	416	208	448	-240	-£13,658
TIME	1842537	1.13%	2070	6	3	258	-255	-£14,543
LIME	2394343	1.47%	54251	149	74	335	-261	-£14,872
MIME	1881697	1.15%	975	3	1	263	-262	-£14,941
MINE	2384927	1.46%	21293	58	29	334	-305	-£17,371
LEAD	2331368	1.43%	1366	4	2	326	-325	-£18,499
DEAD	20209747	12.38%	1785316	4891	2446	2830	-384	-£21,885
HEAT	3647502	2.23%	1723	5	2	511	-508	-£28,975
MEAT	3878607	2.38%	208	1	0	543	-543	-£30,937
LAMB	14583903	8.93%	960504	2632	1316	2042	-726	-£41,390
BEEF	7378797	4.52%	973	3	1	1033	-1032	-£58,811
STEW	25411219	15.56%	6172	17	8	3558	-3549	-£202,316
TOTAL	163,290,209		16,689,576	45,725	22,862	22,862	0	0

Energy values are taken from Supplier Purchase Matrix data, as at the Initial Settlement (SF) Run for 10 July 2013.

Profile Class 5-8 data excludes unmetered.

The calculation mimics GSP Group Correction in relation to NHH consumption, but ignores correction of NHH and HH losses.

Appendix 4: Issue 49 Attendees List

Member	Organisation	24/07/2013	05/09/2013	06/12/2013
David Kemp	ELEXON (<i>Chair</i>)	✓	✓	✓
Claire Anthony	ELEXON (<i>Lead Analyst</i>)	✓	✓	✓
Jon Spence	ELEXON (<i>Proposer</i>)	✓	✓	✓
Hanna Pain	Gemserv	✓	x	☎
Jonathan Moore	GDF Suez Energy UK	✓	✓	x
Walter Hood	IBM on behalf of Scottish Power	✓	x	✓
Peter Gray	SSE	✓	✓	✓
Gill Burrage	SSE Metering Ltd	x	x	✓
Helen Boothman	TMA Data Management Ltd	✓	✓	☎
Stephen Johnson	IMServ	✓	✓	✓
Rachel Curry	IMServ	✓	✓	✓
John Barlow	British Gas	✓	✓	x
Lee Eltherington	British Gas	✓	✓	x
Ben Fuller	British Gas	x	x	✓
Gregory MacKenzie	British Gas	x	x	✓
Amanda Dainty	Total Gas & Power	✓	✓	✓
Amie Charalambous	RWE npower	✓	✓	✓
Lee Stone	E.ON	✓	x	✓
Rachael Burn	E.ON	x	✓	x
Steve Turley	EDF Energy	✓	x	✓
Rhydian Bevan	EDF Energy	x	✓	x