



# CP Report – CP1388 and CP1395

**Meeting Name** Supplier Volume Allocation Group

**Meeting Date** 1 October 2013

**Purpose of paper** For Decision

**Summary** This is the Change Report for Change Proposals (CPs) CP1388 'Meter Technical Details for Smart Meters' and CP1395 'Distribution of Configuration Details for Smart Meters'. It details the background, solutions and their impacts, industry views and ELEXON's analysis of these and recommendations on the way forward. ELEXON invites the SVG to reject CP1388 and approve CP1395 for implementation in the February 2015 Release.

## 1. Why change

### Background to the issue

This section provides pertinent background information associated with the issue and developments since ELEXON last presented the issue to the SVG. Attachment A provides additional background information relating to this issue, which includes the work in this area by the Department of Energy and Climate Change's (DECC) Smart Metering Implementation Plan (SMIP) and the industry group that discussed the work of the SMIP.

### Current arrangements

Meter Technical Details (MTDs) are data sets relating to the Metering Equipment installed at each consumers' premises. These data sets are currently maintained by Meter Operator Agents (MOA) and distributed to the relevant Supplier, Data Collector (DC) and Licensed Distribution System Operator (LDSO) for each Metering System to which the MOA is appointed.

### New operating model for smart Meters

The role of the MOA will change with the roll-out of smart metering.

Under the new operating model, the MOA will continue to install and maintain Meters via site visits, when requested by the relevant Supplier. However, only Suppliers will be able to configure smart Meters, for example, to set and change the Meter's tariff registers to effect a change of Standard Settlement Configuration (SSC). They will achieve this by sending the relevant service request via the Data and Communications Company (DCC) User Gateway<sup>1</sup>, which will result in the appropriate command being sent to the smart Metering System.

<sup>1</sup> The DCC will provide secure communications between the users (Suppliers, LDSOs and authorised parties) and the compliant smart Meters.



It was previously anticipated that where remote configuration is not possible, for example due to a local failure of the Wide Area Network (WAN), that the MOA may be instructed by the Supplier to update a configuration locally (e.g. using a handheld terminal). However, under the DCC/Smart Energy Code (SEC) security architecture<sup>2</sup>, only the Supplier will be able to programme a Meter. Therefore the MOA will only be able to update the configuration using a handheld terminal, if instructed by the Supplier.

## Amending the BSC to reflect the new operating model

A Balancing and Settlement Code (BSC) – Master Registration Agreement (MRA) Working Group ('group') discussed the best approach for amending the BSC to reflect the new operating model. A number of options were considered with one option being fully developed combining elements of the various solutions that had the most support. You can find the consultation carried out by this group, and responses from industry, [here](#).

### CP1388 'Meter Technical Details for Smart Meters'

The 'group' developed its preferred option, which ELEXON raised via CP1388. We also raised MRA Data Transfer Catalogue (DTC) CP3380<sup>3</sup>, to capture the new dataflows in the Data Transfer Catalogue (DTC).

We issued CP1388 for CP Impact Assessment (IA) on the 28 December 2012 under CP Circular (CPC) 00722, with responses returned on 24 January 2013.

When we first presented CP1388 to the SVG for decision on [5 March 2013 \(SVG145\)](#), Approved Modification Proposal [P292 'Amending Supplier & Meter Operator Agent responsibilities for smart Meter Technical Details'](#) had not been approved, which was raised by E.ON in order to provide a 'hook' in the BSC to enable a detailed solution. Without P292 approval, the SVG could not make a decision on whether to approve or reject CP1388 as the CP required the relevant 'hook' in the BSC to be approved.

When making a recommendation to the Panel, the SVG could not make a unanimous endorsement of CP1388, but all agreed that 'no change' is not an option. It therefore recommended by majority that the Panel reject CP1388, but supported a June 2014 Release, if approved. Attachment B provides a summary of the SVG's discussions.

### CP1388 education session

When discussing P292, the Panel were aware that there were divergent views on a detailed solution. It therefore asked ELEXON to hold a session to explain CP1388 to the industry and see if any new opinions or solutions would be raised. We held the session on the 20 June 2013, which covered the details of CP1388 and the various other options considered by the group.

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<sup>2</sup> Security governance, including who may access the smart Meter through the DCC.

<sup>3</sup> This is on hold pending the outcome of CP1388.



Whilst no new views were raised, British Gas made it known that it intended to raise an alternative to CP1388.

## CP1395 'Distribution of Configuration Details for Smart Meters'

British Gas raised CP1395 on 19 July 2013 to address the issue. It thinks that retaining the use of the D0149/D0150 aligns closer to the agreed minimal change principal than CP1388 and addresses any possible ambiguity that may arise during the change of Supply (CoS) processes, in particular around what set of flows a Supplier should be expecting to receive and from whom – i.e. is a Supplier and its systems waiting for the receipt of the D0149/D0150 or new Smart Device Details & Smart Meter Configuration details. It also noted that then any implemented change would be a short term solution should a central MTD register be implemented.

## 2. Solution

This section sets out the two solutions for managing MTDs for smart Meters as identified in CP1388 and CP1395 respectively. Although there may be other options, BSC Parties have not raised these through a CP. As such, we asked participants to assess the merits of CP1388 and CP1395 against the baseline and each other.

Attachment C provides a breakdown of each change and an assessment of the two solutions and the risk to Settlement of each solution. This is the same attachment provided during the joint CP Impact Assessment for CP1388 and CP1395, which we have updated in response to some of the comments received during the joint IA.

Both changes are based on the same assumptions.<sup>4</sup>

### CP1388 solution

For smart Meters, it is proposed that MTD are split into two flows:

- Smart Device Details – consisting of information that is sourced by the MOA based on the Meter and other smart equipment installed on site; and
- Smart Meter Configuration Details – consisting of register mappings and other configuration data that can be set or amended by the Supplier remotely via the DCC.

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<sup>4</sup> It is assumed that:

- Where a smart Meter is serviced by the DCC, security and communications details will remain the responsibility of the DCC and its service providers.
- Where there is a need to transfer security and communications details, this will be via the DCC User Gateway and that the interface definitions will form part of SEC governance. This would include the transfer of such data to and from the DCC and Smart Metering System Operators (SMSO) on an 'opt-in'/'opt-out' of DCC Services (i.e. for Non Domestic, Profile Class 3 and 4 Metering Systems).



Responsibility for sourcing and maintaining the Smart Device Details will remain with the MOA. The MOA will provide the Smart Device Details to the Supplier when a smart Meter is installed, replaced, removed or when any changes are made to the Smart Device Details.

Responsibility for sourcing and maintaining the Smart Meter Configuration Details will rest with the Supplier. If the MOA configures the smart Meter locally, the MOA will send Smart Meter Configuration Details to the Supplier. The smart Meter can then be re-configured remotely by the Supplier, if required, once communications have been re-established.

Whenever there is a change to the Smart Device Details, the Supplier will forward the Smart Device Details to the LDSO (and optionally to the Non Half Hourly (NHH) DC).

Whenever there is a change to the Smart Meter Configuration Details, the Supplier will forward these to the NHHDC and LDSO (and optionally to the MOA).

The Supplier will not be required to send the Smart Device Details and Smart Meter Configuration Details as a pair, but may choose to do so.

The Supplier will also be responsible for distributing the Smart Device Details and Smart Meter Configuration Details to the appropriate participants on change of MOA and change of NHHDC and to the new Supplier on change of Supplier.

Attachment D shows the redlined changes for CP1388.

## CP1395 solution

Suppliers will be responsible for maintaining accurate Smart Meter Configuration Details - consisting of register mappings and other configuration data that can be set or amended by the Supplier remotely via the DCC.

The MOA will retain responsibility for the collation and distribution of MTDs and will continue to use the 'Non Half-hourly Meter Technical Details' (D0150) and 'Notification of Mapping Details' (D0149) data flows for these purposes, irrespective of whether the Meter is smart or non-smart.

Following remote configuration of a smart Meter (on initial installation, Meter exchange or change of SSC etc), the Supplier will provide the new configuration details to the MOA. The method of transfer will be by agreement between the Supplier and the MOA – including bi-lateral (DTC) flows, internal system flows or a new standard industry flow – the Smart Metering Configuration Details flow.

Any Supplier requests for the MOA to install other smart metering equipment (such as a communication hub or In-Home Display) and confirmation by the MOA will be subject to bi-lateral agreement between the Supplier and the MOA. This does not preclude a separate standard industry flow(s) being developed under the MRA, if required.



Attachment E shows the redlined changes for CP1395.

## **Justification, benefits and drawbacks for CP1388 or CP1395**

Provided here is a summary of why each proposer believes their solution is better than the baseline and the other CP. ELEXON has also provided a summary on the benefits and drawbacks of the two solutions.

Both solutions are compatible with the new operating model for smart Meters. This is set out in the Legacy System Changes (Enduring) v2.0 paper and details how the Supplier will discharge its responsibilities, as defined by P292, for MTDs for smart Meters.

Attachment C provides ELEXON's analysis on each element of the two CPs.

### **CP1388 justification**

The proposed solution reflects the preferred solution of the BSC-MRA group and of respondents' to the group's consultation.

The proposed change reflects the revised responsibilities set out in P292 and avoids making the MOA a "post-box" for configuration changes made by the Supplier. Given that configuration changes will usually be made by the Supplier, moving responsibility for distributing data from the MOA to the Supplier will ensure that NHHDCs and LDSOs receive the data they need from a single source at the same time as the Meter readings. The recipients will know who to chase for missing details.

CP1388 would need to be run in parallel with legacy arrangements.

CP1388 introduces greater risk than CP1395 in terms of implementation and costs. However, it is less risky in terms of timeliness and accuracy for distribution of MTDs and Meter readings to the NHHDC, therefore has less risk to Settlement.

Using new dataflows is "cleaner" as it better reflects the separation of responsibilities between Suppliers (who will remotely configure Meters and provide the data that NHHDCs need to process readings) and MOAs (who will still be the source of information, like the Meter Asset Provider (MAP) and test dates, which are not required immediately, if at all, by the NHHDC). This will therefore help in exception reporting and performance monitoring as there will be clear accountability for sending the dataflows.

### **CP1395 justification**

Retaining the use of the D0149/D0150 aligns closer to the Smart Metering Implementation Programme's (SMIP's) agreed minimal change principle than CP1388 and introduces less risk and costs<sup>5</sup> in terms of implementation.

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<sup>5</sup> Whilst most participants haven't provided actual costs, it is clear from the responses that the costs of CP1388 will be significantly more for most than the costs for CP1395.



The extended use of the D0149/D0150 removes any possible ambiguity during the CoS processes around what set of flows a Supplier should be expecting to receive. That is, the Supplier will not have to anticipate whether they should expect the D0149/D0150 or the new Smart Device Details and Smart Meter Configuration Details. In terms of missing MTD on change of Supplier, the new Supplier needs to understand which party it is expecting the MTD from. If not addressed, these could potentially contribute to poor customer experience through CoS events, but more importantly (from a BSC point of view) it adds risks to Settlement of poor data quality. It's difficult to track missing data if there is uncertainty around the nature of the data and its source.

In exploring options for the centralisation of services under the DCC in the Ofgem Smarter Markets Smart Change of Supplier workstream, it has been suggested that the DCC could become a central point for the storage and communication of MTDs. If a central MTD register were to be implemented then any changes implemented here may be a short term solution. If MTDs are centralised, costs can be avoided by minimising the cost of implementation and amount of change and disruption to current business processes. Therefore, CP1395 may result in less wasted effort and cost than CP1388 if future solutions are developed that place less reliance on the need to distribute MTDs (for example, through the smarter markets work). But if a 'CP1388 like' solution becomes the enduring solution, then this would not be the case.

However, under CP1395, the NHHMOA would just be performing a 'pass through' function, which is unlikely to be as efficient as sending the data directly between the participant that carries out the configuration (the Supplier) to the participant that needs the configuration (the NHHDC). This introduces the risk of lateness and error in the MTDs and in interpreting the Meter readings.

### 3. Consequential changes arising from CP1388/CP1395

#### Change of Measurement Class

The scope of CP1388 and CP1395 excludes the Change of Measurement Class (CoMC) processes. This is because further consideration is needed in the wider context of potential changes to the Metering Codes of Practice and the use of elective Half Hourly (HH) metering. These processes are likely to be subject to a subsequent CP, which will also need to take into account any matters arising from [Issue 49 'Change of Measurement Class \(CoMC\) process for Advanced Meters'](#).

#### PARMS Serials

Remote configuration by Suppliers may change the MTD risk to the extent that a Performance Assurance Reporting and Monitoring System (PARMS) Serial is not required for smart Meters, but needs to be run off for non-smart Meters. However, the Performance Assurance Board (PAB) may want changes to the relevant PARMS Serials if it deems it necessary, which may include:

- For CP1388, changes to reflect the transfer of some of the MOA's responsibilities to the Supplier.



- For CP1395, changes to measure timeliness of communicating the new Smart Meter Configuration Details from the Supplier to the MOA, which would require a new PARMS Serial.

These will need to be progressed via a separate Change Proposal. Otherwise, PARMS would remain unchanged.

## 4. Impacts and costs

### Central impacts and costs

#### CP1388

ELEXON costs and impacts		
Document changes	System changes/impacts	Total
BSCP504	No system changes or impacts identified.	1 man day equating to £240 <sup>6</sup>
BSCP514		
BSCP515		
SVA Data Catalogue Volume 1		
SVA Data Catalogue Volume 2		

We issued v0.2 of the redlined changes for IA, which addresses the comments from the previous IA consultation. Further amendments to BSCP514 and BSCP515 are likely to be required with respects to the November 2013 BSC Release due to Approved CP1394 and CP1395, which were approved since changes under CP1388 were first drafted.

#### CP1395

ELEXON costs and impacts		
Document changes	System changes/impacts	Total
BSCP504	No system changes or impacts identified.	1 man day equating to £240 <sup>7</sup>
BSCP514		
SVA Data Catalogue Volume 1		

We issued the redlined changes for IA, using BSCP514 v26, which will come into effect in November 2013.

<sup>6</sup> Includes all activities associated with implementing this proposal.

<sup>7</sup> Includes all activities associated with implementing this proposal.





### Party impacts and costs

Most participants didn't provide actual costs but gave qualitative responses.

#### CP1388

Party impacts	
Party type	Potential impact
Supplier	Significant processes, systems and training to handle these flows. All of these will require sufficient lead times to make these changes. Will need to handle two parallel processes, one for smart Meters and one for legacy NHH Meters. The costs are likely to be significant.
NHHMOA	
NHHDC	Significant processes, systems and training to handle these flows. All of these will require sufficient lead times to make these changes. The costs are likely to be significant.
LDSO	

#### CP1395

Party impacts	
Party type	Impact and costs
Supplier	Less change than CP1388 in terms of processes, systems and training to handle new Smart Meter Configuration Details flow or setting up of bi-lateral arrangements for communicating configuration details.
NHHMOA	
NHHDC	Some training likely to be required. NHHDCs are likely to require processes to ensure Meter readings are paired with correct configuration details.
LDSO	Some training likely to be required.

## 5. Implementation approach

CP1388 and CP1395 are proposed for implementation on 26 February 2015 as part of the February 2015 BSC Systems Release. This is to give Suppliers, LDSOs and Supplier Agents sufficient time, based on IA responses, to implement changes prior to the mass rollout later that year and also enable those that wish to rollout earlier to do so under these arrangements.





## 6. Industry views

We issued CP1388 for a second IA along with CP1395 through CPC00729. We received:

- 17 responses for CP1388, of which seven agreed (one with a caveat) and 10 disagreed; and
- 16 responses for CP1395, of which nine agreed and seven disagreed.

The breakdown of responses is shown in the following table and the full collated participant responses to CP1388 and CP1395 are available on the ELEXON website [here](#).

Summary of responses for CP1388 and CP1395					
Organisation	Capacity in which organisation operates (Supplier, LDSO etc.)	CP1388 Agree?	CP1388 impact	CP1395 Agree?	CP13 95 Impact
Utilita Energy Ltd	Supplier	No	Yes	Yes	Yes
Western Power Distribution	LDSO	Yes	Yes	No	Yes
BGlobal Metering Limited	HHDC, NHHDC, HH Data Aggregator (DA), NHHDA, HHMOA and NHHMOA	No	Yes	Yes	Yes
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDA	No	Yes	Yes	Yes
IMServ Europe Ltd	HHDC, NHHDC, HHMOA, NHHMOA, HHDA, NHHDA	Yes	Yes	No	Yes
GDF SUEZ Marketing Ltd	Supplier	No	Yes	Yes	Yes
Spark Energy	Supplier	No	Yes	-	-
Siemens Metering, Communications & Services	NHHMOA, NHHDC, NHHDA, HHMOA, HHDC, HHDA, Central Volume Allocation (CVA) MOA	Yes	Yes	No	Yes
ScottishPower	Generator, Supplier, LDSO, Supplier Agents	No	Yes	No	Yes
Electricity North West Limited	LDSO	Yes	Yes	No	No
EDF Energy	Supplier, NHHDC, NHHMOA, HHMOA	Yes	Yes	No	Yes
SSE	Supplier, NHHMOA, NHHDC	No	Yes	Yes	Yes
Total Gas & Power	Supplier	No	-	Yes	-
Haven Power Ltd	Supplier	No	Yes	Yes	Yes



Summary of responses for CP1388 and CP1395					
Organisation	Capacity in which organisation operates (Supplier, LDSO etc.)	CP1388 Agree?	CP1388 impact	CP1395 Agree?	CP13 95 Impact
British Gas	Supplier, MOA	No	Yes	Yes	Yes
E.ON	Supplier	Yes	Yes	No	Yes
Npower	Supplier and Supplier Agents (HH and NHH)	Yes – with caveats	Yes	Yes	Yes

During this consultation, we asked some specific questions relating to these changes. The responses to these are captured under Attachment F. The following is a summary of the consultation responses.

#### Summary of participant views on CP1388

From the second consultation, those that supported CP1388 noted that:

- The provision of asset details from the MOA to Supplier remains unchanged.
- It has less risk of failure due to a single source of MTDs sent to DC and LDSO and provided from the party with BSC obligations and responsibilities for sending them.
- It is simpler and more efficient.
- It has a single point of contact in the case of missing MTDs.
- The Supplier could validate MTDs against Registration data held in SMRS to ensure consistency before passing it to other parties.

Those that are against CP1388 noted that:

- It results in significant change to the Supplier responsibilities, which will be costly and disruptive to implement and which are unlikely to be an enduring solution.
- Two distinctly different processes for MTD distribution will create a 'two tier process', which will increase the complexity of the process and therefore increase the risk to Settlement.
- There will be additional complexity in determining the source of missing data for escalation purposes.
- Major changes to the current processes may result in the need for re-certification, which will increase costs and implementation timescales.
- Suppliers may struggle to relate tariffs and SSCs together in their systems, which could result in them providing erroneous configuration detail flows or none.



## Summary of participant views on CP1395

Those that supported CP1395 noted that:

- The party with experience and expertise takes responsibility for this activity.
- It is the simplest solution, complying with the 'minimal change principle' utilising existing flows, systems and processes; and therefore is the least risky.
- When attending site, the MOA being informed of the configuration of the Meter will be better placed to make sure it collects all the register readings if requested by Supplier, which will also aid Suppliers in achieving their Supplier Licence Condition 12 obligations, which relate to theft and inspection of Meters.
- The points of failure already exist with the timely provision of MTDs to the NHHDC a focus of the PAB.
- Any risk could be mitigated through appropriate controls - such as follow up processes where by the Supplier ensures that the NHHDC has received the MTDs and Meter readings.
- Improvements to MTDs distribution could be introduced at a later date based on evidence rather than assumption. This could either be based on experience and testing with the DCC; or through an enduring solution when registration is brought into the DCC.

Those that are against CP1395 noted that:

- By adding an additional party into the process, which isn't the originator of the configuration details and which will be different from the party providing the Meter readings, will increase:
  - the risk that MTDs become corrupted/misaligned or not passed on at the same time as the Meter readings, which in turn can result in the readings being misinterpreted or delayed in the event that a read is received before configuration details; and
  - the number and complexity of intra-party queries;
- It does not resolve the current issue with the inconsistency of data between the D0149/D0150; and these conflicting with the Registration data provided by the Supplier.
- Recipients of dataflows (MTDs and Meter readings) will not know which sets they are expecting to receive.
- Less defined demarcation between smart and legacy Meters, which may lead to errors being carried forward into future smart processes.
- Over reliance on bilateral arrangements for the communication of information.



## Summary of views for those against any change

One Party is against any change, the Party noted that:

- Suppliers should determine how distributing MTDs should be carried out and what mitigation techniques should be put in place, recognising that some suppliers might wish to continue distributing MTDs through an MOA, but that others should be allowed the option of distributing them directly.
- Smart metering will have benefits for the following, which will reduce the need for any BSC governance around these Metering Systems:
  - the Performance Assurance Framework (PAF), in particular the top NHH Settlement Risks, which should lead to the PAF focus for NHH Settlement Risks moving to minor issues; and
  - a reduction in the costs of managing the Settlement arrangement.
- The level of MOA intervention will reduce for smart Meters during rollout (and cease completely at the end of rollout), so processes for smart Meters aren't required as they will have no direct impact on Settlement.
- The industry should concentrate on developing the SEC to meet all smart Meter requirements, separating out the smart requirements into the SEC and legacy arrangements in the BSC Procedures.

## Timescales for transfer of data for CP1395

One of the questions we asked in the consultation was in regard to the timescales for transfer of data, as set out in CP1395. This proposal doesn't suggest changing the existing timescales. However, it was necessary to ask the question as this CP would introduce the additional step in the process (Supplier sending configuration details to the MOA before it provides to the NHHDC), which could cause delays. Most agreed that the timescales were appropriate, with:

- two recognising that this would remain in line with legacy arrangements;
- one stating that there would be sufficient time; and
- another noting that it would may be useful to have a specific timescale for the Supplier to provide the configuration details to the MOA.

Of those respondents who thought that the timescales should be changed only two provided comment. Those comments were split, with:



- one thinking that MOAs would fail to meet the 10 Working Days (WDs) as they were more likely to be waiting for the Supplier to provide the configuration details; and
- the other thought that remote configuration of the Meter would result in quicker provision on the MTDs, so would like to see the timescales reduced to one WD.

It is our view that whatever CP is approved, if any, that further changes in regard to timescales may become necessary. But that this should be assessed based on evidence.

### Comments on the proposed redlining

We have received several comments relating to the redlined changes to both CP1388 and CP1395. Our recommendation on each is included in Attachment F.

## 7. Recommendations

### Assessment review

We note that industry is polarised in its views on each change, especially with regard to the risk each change will represent to Settlement. It is clear to us that the changes in responsibility for configuring the Meters will represent a challenge to Suppliers and potentially a risk to Settlement, whether CP1388 or CP1395 is implemented. And whilst we believe that CP1388 is the least risky to Settlement, we recognise that this is not without risks, too.

Whilst 'no change' is an option, as P292 places overall responsibility on the Supplier and points to the current BSCP arrangements for distributing MTDs, there would be a gap in terms of distributing the configuration details and associated readings, which Suppliers and MOAs would need to fill by bilateral agreement. The SEC cannot include Settlement governance unless the BSC and licenses provide for it to do so - ELEXON is not aware of any proposal to amend the Transmission Licence or modify the BSC. At this point in time, it is not certain that MTDs will be held centrally (for example as part of the DCC's systems), and this will not be the case at the start of the mass smart Meter rollout. We therefore think that it is important that the Code Subsidiary Documents (CSDs) include how the Supplier will discharge its responsibilities for MTDs.

It is our view that the SVG should approve CP1395 and reject CP1388.

### Rationale for recommending CP1395

It is clear that there are polarised views on the two solutions. These reflect uncertainty about the future roles of Suppliers, MOAs and data processors in processing the readings from smart Meters and the role that MTDs will play in new smart processes.



It is our view, therefore, that CP1395 should be implemented as it introduces an industry standard for Suppliers to notifying MOAs of smart Meter configuration details. Because of the conflicting views and uncertainty it would not be prudent to implement the more complicated CP1388 solution at this point in time, whatever its merits as a longer term solution.

It is also our view that doing nothing would place too much reliance on bilateral agreements to the detriment of small Suppliers and independent MOAs. CP1395 allows Suppliers with in-house MOAs to agree bilateral arrangements, whilst providing an industry 'standard configuration details' flow for those who wish to use it. As such CP1395 represents a lower cost interim solution pending further smart developments.

It is our view that any Settlement Risk associated with CP1395 is, or can be, mitigated as:

- P292 provides clear responsibility on the Supplier for MTDs; and
- the PAF can be used to measure and mitigate any risk.

In addition, the industry could consider further changes to:

- improve CP1395;
- further address any issues and risks that become apparent during the implementation and testing of CP1395 and the rollout of smart Meters; and
- bring in an enduring solution, based on any changes to the DCC and identified by Ofgem's smarter markets work.

### Impact of P292

We note that P292 provides explicit responsibility on the Supplier for the distribution of MTDs. As such, any failure or delay in providing MTDs to the NHHDC is the responsibility of the Supplier to address, even under an MOA led distribution or with no change. So under CP1395, NHHDCs and LDSO should contact the Supplier if there are issues; and the Supplier should look to ensure these issues are resolved promptly.

### Use of the Performance Assurance Techniques

The existing Performance Assurance Techniques can be used to measure and mitigate any risk.

### Further changes

As well as the consequential changes already identified we think that it is important to look at the specific risk that the NHHDC will receive Meter readings prior to the MTDs. We note that the proposer of CP1395 is open to these additional amendments, which would require a subsequent CP.



We are aware that Ofgem's smarter markets project is considering an option that would see MTDs managed by the DCC. Whilst no decision has been made on this, it does create uncertainty around an enduring solution and if implemented will impact on any solution for MTD distribution.

## Recommendation

We invite the SVG to:

- a) **APPROVE** CP1395 for implementation on 26 February 2015, as part of the February 2015 BSC Release;
- b) **AGREE** with the CP1395 proposed amendments to BSCP504, BSCP514 and the SVA Data Catalogue volume 1;
- c) **REJECT** CP1388; and
- d) **AGREE** that the proposed amendments to BSCP504, BSCP514, BSCP515, SVA Data Catalogue volume 1 and SVA Data Catalogue volume 2 deliver the aims of CP1388.

## Appendices:

None

## Attachments:

Attachment A – Background to changes  
Attachment B – Previous SVG views on CP1388  
Attachment C – CP1388 and CP1395 detail and analysis  
Attachment D – CP1388 redlining v0.2  
Attachment E – CP1395 redlining v0.1  
Attachment F – CP1388 and CP1395 consultation responses

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