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Change Proposal Circular – CPC00729 Responses

CPC00729: Impact Assessment of CP1388 & CP1395

Summary of Responses for CP1388 & CP1395

ORGANISATION	Change	Agree with the change?	Impacted?	Cost?	Implementation Date?
Utilita Energy Ltd	CP1388	No	Yes	High cost	Agree with caveat (Feb-15)
	CP1395	Yes	Yes	Low cost	Agree (Feb-15)
Western Power Distribution	CP1388	Yes	Yes	<£10,000	Agree (Feb-15)
	CP1395	No	Yes	None	Agree (Feb-15)
BGlobal Metering Limited	CP1388	No	Yes	High cost	Agree but notes potential need for Re-Qualification, which would require an addition amount of time (Feb-15)
	CP1395	Yes	Yes	Lower costs than CP1388	Agree (Feb-15)
TMA Data Management Ltd	CP1388	No	Yes	High cost	Agree but notes potential need for Re-Qualification, which would require an addition amount of time (Feb-15)
	CP1395	Yes	Yes	Low cost	Agree (Feb-15)
IMServ Europe Ltd	CP1388	Yes	Yes	-	Agree (Feb-15)

Summary of Responses for CP1388 & CP1395					
ORGANISATION	**Change**	**Agree with the change?**	**Impacted?**	**Cost?**	**Implementation Date?**
	CP1395	No	Yes	-	Agree (Feb-15)
GDF SUEZ Marketing Ltd	CP1388	No	Yes	Very high costs	Agree (Feb-15)
	CP1395	Yes	Yes	Low.	Agree (Feb-15)
Spark Energy	CP1388	No	Yes	Unable to provide costs at this time	Disagree
	CP1395	-	-	-	-
Siemens Metering, Communications & Services	CP1388	Yes	Yes	Unable to provide costs at this time	Agree (Feb-15)
	CP1395	No	Yes	Unable to provide costs at this time	Agree (Feb-15)
ScottishPower	CP1388	No	Yes	Unable to provide costs at this time	Don't see need for CP
	CP1395	No	Yes	Unable to provide costs at this time	Don't see need for CP
Electricity North West Limited	CP1388	Yes	Yes	£150 – 250k	Agree (Feb-15)
	CP1395	No	No	N/A	Agree (Feb-15)
EDF Energy	CP1388	Yes	Yes	Unable to provide costs at this time	Agree (Feb-15)
	CP1395	No	Yes	Unable to provide costs at this time	Agree (Feb-15)
SSE	CP1388	No	Yes	High costs	Agree (Feb-15)
	CP1395	Yes	Yes	Low to medium cost	Agree (Feb-15)

Summary of Responses for CP1388 & CP1395					
ORGANISATION	**Change**	**Agree with the change?**	**Impacted?**	**Cost?**	**Implementation Date?**
Total Gas & Power	CP1388	No	-	-	-
	CP1395	Yes	-	-	-
Haven Power Ltd	CP1388	No	Yes	-	-
	CP1395	Yes	Yes	-	-
British Gas	CP1388	No	Yes	£500k - £750k	-
	CP1395	Yes	Yes	~£50k	Agree (Feb-15)
E.ON	CP1388	Yes	Yes	-	Agree (Feb-15)
	CP1395	No	Yes	-	Agree (Feb-15)
Npower	CP1388	Yes – with caveats	Yes	-	Agree (Feb-15) [needs 365 days to implement]
	CP1395	Yes	Yes	-	Agree (Feb-15)

Detailed Impact Assessment Responses CP1388 & CP1395

Organisation	Responses/Comments
Utilita Energy Ltd	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Whilst a MOA distribution process would add an additional party into the process of MTD distribution it does have the benefit of enabling a party with experience within this process to take responsibility for this activity. CP1388 proposes a significant change to the Supplier responsibilities and also creates a 'two tier process' which adds greater complexity to the process for the distribution of MTDs and therefore must add a risk to the integrity of settlements." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes broadly. Whilst CP1388 refers to potential delay in the distribution of data where the MOA would remain involved in the process this issue of a reliance on another party to provide data before a process can move forward already exists within the industry. This is not to justify it and suggest that improvements should not be sought, however the risk to settlement of running a single MTD process, distributed by one agent type with significant experience in performing this function is less of a risk to settlement than a potential delay in the distribution of data proposed under CP 1388." **Do you agree with the proposed change…?** **CP1388** "No. The proposal adds significant complexity to the process and the operation of a dual process for legacy and Smart metering poses a risk to settlement. The proposal does not fall in line with the minimal change principle

Utilita Energy Ltd	and would result in significant costs to industry parties in terms of system changes and training. ” **CP1395** “Yes” **Do you agree with the timescales for transfer of data as set out in CP1395?** “Yes as they remain the same whether the meter is smart or non-smart. A remote configuration by the Supplier, is much quicker than a local configuration, therefore, Suppliers have enough time to send the configuration details to the MOA, in time for the MOA to send the D149/D0150 to the relevant parties and party agents within 10WD of a change of meter configuration.” **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** “The major risk is the implementation of a two tier process for MTDs. This adds complexity and uncertainty as to who parties should expect to receive MTDs from. In turn this could result in delays which would have a detrimental impact upon settlement. This CP also asks a party with no previous experience of responsibility for the distribution of MTDs to become responsible for this process where Smart metering is involved.” **CP1395** “Given that remote configuration lends itself to significantly quicker updates to mapping data than local configuration the additional data transfer from supplier to MOA should not have an onerous impact upon the timescales for the distribution of MTD data following changes to the meter point. The distribution of MTDs from MOA to NHHDC agents are currently monitored by PARMS. Given the process specified in CP1395 it is not anticipated that the timeline for the distribution of data would be adversely impacted by the change.” **How is your organisation impacted by [this change]?** **CP1388** “GETW are impacted as a supplier. Significant system change would need to be developed in order to facilitate the revised process detailed in CP1388.” **CP1395** “GETW are a supplier. Some system change required but not as significant as CP1388”

Utilita Energy Ltd	**What are the associated costs on your organisation to implement [this change]?** **CP1388** "High costs" **CP1395** "Low cost" **Do you agree with the implementation approach?** **CP1388** "Assuming that systems could be developed in time to meet the changes detailed then yes." **CP1395** "Yes"
Western Power Distribution	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Ultimately any risk of failure could be appropriately mitigated. It just may need a lot of follow up and introduction of additional controls to do so. Under CP1388 the MOA remains responsible for sending asset details to Supplier. This is in line with the current processes. However, the onward transmission of these and the associated configuration flow will be done from a single source and, more importantly, from the party with the obligation and responsibility for sending them. We therefore agree there is less risk of failure under CP1388 proposals CP1388 is simpler and likely to be more efficient." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes it is generally a fair analysis." **Do you agree with the proposed change…?**

Western Power Distribution	**CP1388** "Yes. As a LDSO we rely on receipt of accurate METD in a timely manner. We believe the approach proposed under CP1388 is more likely to meet our requirement." **CP1395** "No. We think it is less efficient overall than the solution proposed under cp1388" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "Nothing substantive over and above those that already exist. If anything there will be less risk as the NHHDC is reliant on receiving a single flow rather than two." **CP1395** "The main risk is that the NHHDC will now be reliant on receipt of information from two parties rather than from a single source as proposed under cp1388." **How is your organisation impacted by [this change]?** **CP1388** "We will need to receive and process new flows which will impact our flow routing processes and the business systems to which those flows are sent." **CP1395** "Only marginally as we only receive the data and have no obligation to process anything. However, we are reliant on accurate settlement data for correct Use of System billing and we believe this CP increases the risk of us receiving inaccurate data." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "<£10,000" **CP1395** "Nil cost option"

Western Power Distribution	**Do you agree with the implementation approach?** **CP1388** "Yes" **CP1395** "Yes" **Any other comments?** **CP1388** "Given the delay in the CP assessment process and the deferment of DCC go-live we see no reason for this CP to be implemented in 2014 and would prefer a Feb 2015 implementation."
BGlobal Metering Limited	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "We do not agree that an MOA distribution approach would be more complex and have more potential points of failure. Using the same flows for smart and non-smart meters, as well as keeping the MOA the sole party agent responsible for distributing the MTDs to the NHHDC and LDSO, is the simplest solution. This approach has minimal change to all parties." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "In principle yes, although the MOA will receive some information from the Supplier which might cause a delay in the process of information to relevant parties which could impact Settlements. In CP1395 the MOA does not add any further value to the configuration details as provided by the Supplier but as this process remains very similar for Smart and non Smart this outweighs any risk associated with the MOA."
BGlobal Metering Limited	**Do you agree with the proposed change…?** **CP1388** "No. This potentially will force Suppliers and Agents to undertake major system change and expense

BGlobal Metering Limited	without any assurance that this will be a lasting and enduring system. In light of the uncertainties associated with the DCC role and outstanding Smart meter market issues, CP1388 may not provide an enduring solution." **CP1395** "Yes" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes as they remain the same whether the meter is smart or non-smart. A remote configuration by the Supplier is much quicker than a local configuration; therefore, Suppliers have enough time to send the configuration details to the MOA, in time for the MOA to send the D149/D0150 to the relevant parties and party agents within 10 working days of a change of meter configuration." **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "CP1388 poses a higher risk to settlement than CP1395 in that it introduces major changes to the current processes. This may result in re-certification by some, if not all, party agents that are impacted. This will increase costs and implementation time. In addition, increased change to processes poses a higher risk to settlements in terms of quality and timeliness of data for Settlement" **CP1395** "SR0040 already exists to monitor the transfer of MTD between MOA and NHHDC. The implementation of CP1395 risk to settlement is covered by SR0040, with little likelihood to increase its net significance. " **How is your organisation impacted by [this change]?** **CP1388** "We would be impacted as a NHHDC and a MOA requiring major system changes and process changes." **CP1395** "CP1395 will have an impact on systems and process but this will be a much lower impact than the changes needed to support CP1388."

	What are the associated costs on your organisation to implement [this change]? **CP1388** "High costs" **CP1395** "Lower cost than CP1388." **Do you agree with the implementation approach?** **CP1388** "Yes but the need for re-certification would add to the overall timeline for CP1388 and reduce the time that party agents would have to develop the solution." **CP1395** "Yes"
TMA Data Management Ltd TMA Data Management Ltd	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "No, a MOA distribution might appear to add a level of complexity but keeping the same flows for smart and non-smart meters as well as keeping the MOA the sole party agent responsible for distributing the MTDs to the NHHDC and LDSO is the simplest solution, complying with the minimal change principal." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes, with a slight caveat. The analysis often refers to the fact that with CP1395, the MOA is responsible for providing the D0149/D0150 to the NHHDC and LDSO but for Smart Metering, the MOA will receive some of the required information from the Supplier, potentially causing a delay in the transmission of information to all relevant parties with a knock on effect on Settlement. This is all correct, however, most of the Industry processes rely on one party providing information to another party before the process can move on. In CP1395, the MOA does not value add to the configuration details provided by the Supplier but the very fact that the process remains very similar between Smart and non Smart far outweighs any perceived increased risk of the MOA acting as a post box."

TMA Data Management Ltd	**Do you agree with the proposed change…?** **CP1388** "No. It is paramount to use the minimal change principal so that Suppliers and party Agents are not forced to undertake major System changes at great expense without the assurance that this is a lasting, enduring solution. With the uncertainties of the full DCC role and the Smart Meter market organisation still outstanding, CP1388 does not fit in with the minimal change principal or the lasting, enduring solution principal." **CP1395** "Yes". **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes as they remain the same whether the meter is smart or non-smart. A remote configuration by the Supplier, is much quicker than a local configuration, therefore, Suppliers have enough time to send the configuration details to the MOA, in time for the MOA to send the D149/D0150 to the relevant parties and party agents within 10WD of a change of meter configuration." **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "As CP1388 introduces major changes to the current processes, it is likely that re-certification will be required by some if not all party agents impacted, adding to the already prohibitive costs of CP1388 possible implementation. That would have to be taken into account in the time required for implementation. The more a change impacts on existing processes, the higher the risk to settlement that the implementation will disrupt the quality and timeliness of the data delivered for Settlement. CP1388 therefore poses higher risk to settlement than CP1395." **CP1395** [Did not respond] **How is your organisation impacted by [this change]?**

	CP1388 "TMA would be impacted as a NHHDC, requiring major system changes as well as procedural changes" **CP1395** "Low impact on procedures, potential low impact on systems." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "High costs" **CP1395** "Low cost." **Do you agree with the implementation approach?** **CP1388** "Yes but as mentioned in question 4 [What risks to Settlement do you believe may be a result of implementing CP1388?], the need for re-certification would add to the overall timeline for CP1388 and reduce the time that party agents would have to develop the solution." **CP1395** "Yes".
IMServ Europe Ltd IMServ Europe Ltd	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes because the more participants and systems the flows have to pass through the more chance there is of them becoming corrupted or getting stuck. Having the party who effects the change being responsible for sending the details out ensures things are sent in the correct order and with minimal delay – one person in control." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes"

IMServ Europe Ltd	**Do you agree with the proposed change…?** **CP1388** "Yes" **CP1395** "No" **Do you agree with the timescales for transfer of data as set out in CP1395?** "No. I thought the whole idea with remote comms and Smart meters was to, where possible, speed things up and so I would have like to see the timescales for transfer of data reduced to 1 working day". **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "Suppliers struggle to relate tariffs and SSCs together in their systems and sends erroneous Configuration Detail flows or none at all." **CP1395** "A process that currently doesn't tend to work well (SSC change) will have even more places to go wrong – leading to NHHDC having different SSCs to the Suppliers, meter readings failing and Settlement performance dropping off. Where a Supplier has made a configuration change to a Smart meter, he would need to store the SSC that was now in the meter – but also the SSC the MOP currently holds, so that he would know to chase the MOA if the SSC change he notified the MOA about was never returned (because the MOA errored the flow). As it is the MOA that tells the NHHDC the SSC, if the Supplier does not monitor what it has last had from the MOA, then it will not be able to prevent read failures in NHHDC for SSC mismatches. Also, when does the Supplier send the D0052 – at the same time as he sends the SSC update to the MOP (because that is when he updates his own systems with the new SSC) or when he gets the new correct MTDs back from the MOP (but what does he have in his system in the meantime – he knows the correct new SSC but still retains the old SSC until MOP updates him). We can see Suppliers updating SSCs and immediately updating their own systems and sending off Config Detail updates to the MOA and D0052s to the NHHDC, and then never tracking whether the MOA processes the SSC change or not. MOAs won't see this as top priority as they no longer really care about the configuration and so when the Supplier

IMServ Europe Ltd	flow has some data issue within it this will never get resolved. We believe this will make SSC mismatch issues even harder to fix than they are under the existing arrangements." **How is your organisation impacted by [this change]?** **CP1388** "As a Mop we would need to be able to send the "new D0150" flows out for Smart meters rather than normal MTDs. As a NHHDC we would need to be able receive and process the new "Smart MTDs". We would also need to know [whom] to chase Suppliers for missing "Smart MTDs" rather than MOAs." **CP1395** "As a NHHMO, we would need to establish a process to receive details of Configuration changes from the Supplier. As a NHHDC, we don't envisage significant change – apart from where we are chasing missing or erroneous flows and may place more emphasis on chasing the Suppliers first rather than the MOA" **What are the associated costs on your organisation to implement [this change]?** **CP1388** "MOP system is 3rd party developed and maintained – we do not have costs at this stage to make these changes. DC system – we anticipate this would require up to 75 man days of development, testing, implementation and training" **CP1395** "MOP system is 3rd party developed and maintained – we do not have costs at this stage to make these changes. DC system – we anticipate this would require up to 10 man days of development, testing, implementation and training" **Do you agree with the implementation approach?**

	CP1388 "Yes" **CP1395** "Yes"
GDF SUEZ Marketing Ltd	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388** "No, the fact that two distinctly different processes will be used to distribute MTDs for smart and non-smart metering systems will actually add complexity to the process. Maintaining the MOA distribution approach across the market is the least complex option." **CP1395** "No. Maintaining an MOA distribution approach across the market would be simpler than having two separate processes for smart and non-smart metering systems." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes" **Do you agree with the proposed change…?** **CP1388** "No. We believe that to ensure that SMIP is a success for all parties the processes for smart metering, at least initially, should be kept as close to the existing market processes as possible." **CP1395** "Yes" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes. The proposed 10 working days is the standard timescale for sending Meter Technical Details. Although a definitive timescale in which a supplier must send the smart meter configuration details to the MOA could be considered. 5 working days from the date of remote configuration for example."
GDF SUEZ Marketing Ltd	

GDF SUEZ Marketing Ltd	**What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "As there are major changes to existing processes, there is a risk that the level of successful implementation will differ across parties. The more parties where there are implementation issues, or where the changes are not properly understood, the greater the risk that meter configuration changes will not be communicated correctly." **CP1395** "There would be a small increase in the risk that the transfer of Meter Technical Details would be delayed." **How is your organisation impacted by [this change]?** **CP1388** "As a supplier we will need to implement large scale system changes in order to maintain meter technical details and to send and receive the new flows when dealing with smart meters. We would also need to ensure that we have the correct operational knowledge inside the company to understand smart meter technical details and to answer queries on these. This is not knowledge that we currently possess." **CP1395** "Supplier. – We would need to send the new flow to communicate changed smart meter configuration details." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "Very high costs. (Not yet quantified) For GDF SUEZ, being a primarily I&C supplier with a small NHH portfolio in profile classes 3-4, these costs would be disproportionate to the proportion of our business impacted by SMIP." **CP1395** "Low. If GDF SUEZ's numbers of smart meters remain low a manual process could initially be used." **Do you agree with the implementation approach?**

	CP1388 "Yes" **CP1395** "Yes"
Spark Energy	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes" **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "No" **Do you agree with the proposed change…?** **CP1388** "No" **CP1395** – No response **Do you agree with the timescales for transfer of data as set out in CP1395?** – No response **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** – No response **CP1395** "" **How is your organisation impacted by [this change]?**
Spark Energy	**CP1388** "As supplier this CP would necessitate changes to our software. Our industry interfaces would require upgrading. Full training on flow management would have to be implemented."

	CP1395 No response **What are the associated costs on your organisation to implement [this change]?** **CP1388** "All of the above would come at a cost. It is too early to make a solid judgement on total outlay." **CP1395** No response **Do you agree with the implementation approach?** **CP1388** "No because this is only the first part of a wider change management that is required to accommodate smart meters. Our opinion is that all avenues should be rolled out at the same time in order to reduce the chances of conflicts between processes. Until the mandatory flows have been created we feel it difficult to make a solid judgement around the full impact to our systems and business interfaces." **CP1395** No response **Any other comments?** **CP1388** "We support the intention of the change and understand the need for some of the proposed changes. We do, however, view this as a partial necessity. We are fully in agreement with the Npower response [from previous consultation] "We feel that making the proposed changes in isolation will leave some processes within the BSCP(s) un-usable." **CP1395** no response
Siemens Metering, Communications & Services	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388** "Yes. With CP1388 all the data flows to the NHHDC are from the Supplier. Whereas with CP1395 there is a combination of data flows from Supplier and MOA to the NHHDC this will result in more complex processing for the

Siemens Metering, Communications & Services	NHHDC, more risk of errors being introduced, more intra-party queries being raised when the CP1395 solution was operational and more risk to Settlement than the CP1388 proposal" **CP1395** "Yes. With CP1395 the MOA has to convert the prime data flow (Smart Meter Configuration Details) from Supplier into D0149/D0150 to pass to NHHDC, this is a possible source of additional errors and delays. This would be avoided by the Supplier sending the new data flows, Smart Device Details and Smart Meter Configuration Details to the relevant parties. Siemens believe that CP1395 does not does not fully consider the impact of its proposal on all the relevant parties. The NHHDC will have to develop processes to cope with receiving related data flows from different sources which are not required with CP1388. Siemens believe that the CP1395 solution will result in more operational BAU queries between NHHDC, MOA and Supplier than the CP1388 proposal." **Do you agree with the analysis of both CPs presented in Attachment E?** "Yes. However there are omissions from Analysis of the two options. **CP1388** Item 'Obligation to communicating the latest configuration details': The CP1388 text omits the fact that it makes allowance for the sending of latest configuration details from the Supplier to the MOA on an optional basis. Siemens are of the view that this should be a mandated requirement – as previous stated in CP3188 workshops and consultations. As the provision of these details is a core requirement of the CP1395 proposal, there is no reason why this should not be mandated in CP1388. In terms of analysis… The provision of this data in CP1388 is not a pre-requisite of the distribution of the MTD flows whereas it is in CP1395. However, there are reasons why the passing of this data after meter configuration in a timely manner is beneficial to the MOA."

Siemens Metering, Communications & Services	**CP1395** Item "Distribution of MTDs" The allowance of different options for the transfer of new configuration details between the Supplier and MOA in CP1395 is not beneficial in a competitive market where this information is key to the integrity of the MTD. The provision of multiple options is potentially anti-competitive as it could make it prohibitively expensive for an independent Meter Operator to operate with different Suppliers, each with their own arrangements in this area, and so act as a bar to new Suppliers entering the market who don't have an in-house workforce A standard way of transferring meter configuration data between the Supplier and the Meter Operator is necessary and this should be achieved by the adoption of the Smart Metering Configuration Details Flow. CP3188 uses the new data flows to give this standard approach for MTD transfer." **Do you agree with the proposed change…?** **CP1388** "Yes. Although we do have some reservations, due the fact that the Smart Meter Configuration Details data flow is not a mandated flow to MOA, which potentially leaves the MOA with incomplete information about the smart meter and associated equipment." **CP1395** "No. CP1395 does not support open industry competition. It proposes the use of more than one mechanism to transmit data relating to Installation, Change of Functionality and Removal of Metering Systems requests from Suppliers to MOA. Therefore existing and potential MOAs have to develop multiple processes instead having a single standard process to handle the relevant data from all Suppliers which has the benefits of minimising costs and reducing the probability of data errors. The MOA has to develop, test and implement system changes to convert prime dataflow (Smart Meter Configuration Details) from Supplier into D0149/D0150 to pass to NHHDC and LDSO. We can see no benefit to the MOA in this approach, where NHHMOA provides a 'post-box' function. It adds no value but might add delays in getting the data

Siemens Metering, Communications & Services	to other parties and increases the possibility of introducing errors." **Do you agree with the timescales for transfer of data as set out in CP1395?** "No. Siemens believe that there is more likelihood of failing the 10WD timescale of transmitting the MTD data to the LDSO and NHHDC when the MOA is dependent on receiving the data from the Supplier." **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "Siemens think that the additional risks to Settlement are lower than with CP1395, where Smart Meter Configuration Details data flows and D0145/150 are provided to the NHHDC by the Supplier and MOA respectively. This approach is intended to reduce some dependencies thereby reducing risk to Settlement. There must be risks associated with the introduction of new data flows and process changes for parties across the industry. However, the risks can be mitigated if the Suppliers are subject to the equivalent Auditing and PARMS reporting that is currently used with the MOA. Also, the introduction of new flows specifically for smart metering will give greater clarity thereby reducing risk." **CP1395** "Greater risks to Settlement than CP1388. As stated in the Analysis there could be possible delays to Settlement because the NHHDC has not received all the required data flows from both the Supplier and the MOA, or the flows are received by the NHHDC in the incorrect sequence. MOA has to covert prime dataflow (Smart Meter Configuration Details) from Supplier into D0149/D0150 to pass to NHHDC, this is a possible source of additional errors. Use of the D0149/D0150 method would mean that the NHHDC would have to determine if they relate to a Smart or a legacy meter and therefore additional information is required from the Smart meter. This will mean that the NHHDC will have to make system changes to cope with the changes in the use of D0149/D0150. This issue does not exist with CP1388 as all information relating to the Smart meter goes directly from Supplier to NHHDC using the

Siemens Metering, Communications & Services	new data flows and although the NHHDC will have to make system changes to handle the new data flows there is less risk to Settlement for legacy meters as the processing of D0149/150 should unaffected." **How is your organisation impacted by [this change]?** **CP1388** "Significant system software changes would be required to accommodate the introduction of the new Smart Device Details, Meter Configuration Details and Smart Equipment Work Management Request flows. Operational processes would also need to be created and implemented to cover the responsibilities for the data and handling of the new flows." **CP1395** "Significant system software changes would be required to accommodate the introduction of the new Smart Meter Configuration Details flow. Operational processes would also need to be created and implemented to cover the responsibilities for the data and handling of the new flow." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "Unable to provide details costs at this time. An estimate of 18 months to implement the system changes (including analysis, design, development & testing) for these new data flows has be provided as an initial figure." **CP1395** "Unable to provide costs at this time (See reply to CP1388…)" **Do you agree with the implementation approach?** **CP1388** "Yes. We would like a decision as soon as possible to allow us the time to plan, develop, test and implement the necessary system and operational processes changes to meet the February 2015 target implementation date. (See the answer to question 8b [What are the associated costs on your organisation to implement [this change]?])."

Siemens Metering, Communications & Services	**CP1395** "Yes, if this refers to the suggested go-live date of February 2015." **Any other comments?** **CP1388** "CP1395 requires the Supplier to provide the MOA with Smart Meter Configuration Details, whereas this is only optional in CP1388. We see there is no reason why this is not mandatory in CP1388. Having this data this will provide the MOA with complete and up to date information about the meter, and will avoid delays in when having to request the data from the Supplier when the MOA has been asked to do a site visit. CP1388 can, and no doubt will, be implemented by some Parties and Agents in a way that would mitigate the concerns raised in CP1395. CP1388 makes allowance for the MOA sending the Smart Device Details flow and the Smart Meter Configuration Flow to the Supplier. The MOA can therefore produce these flows and send them to the Supplier who can accept them and simply change the Role Code and send on to the NHHDC and LDSO. A further option is that CP1388 could be modified slightly to build in optionality so that the MOA can send the Smart Device Details flow and the Smart Meter Configuration Flow to the NHHDC and LDSO as an alternative approach." **CP1395** "NHHDCs are likely have to develop processes and make system changes to cope with storing the initial reads from the Supplier until the MTD is received from the MOA. In CP1395 the information relating to additional smart equipment is not available to the MOA because the relevant new data flow is not used. This will result in the MOA having incomplete information about the smart meter site."
ScottishPower ScottishPower	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Clearly, the complexity of a process increases with the number of steps, just as its potential points of failure increase with the number of actors. By reducing both the number of actors and the number of steps involved, a supplier distribution of MTDs should simplify the process, lending comparatively more credibility to the CP1388 solution; but it would be both costly and disruptive to implement.

ScottishPower	In our view, the manner in which each supplier discharges its responsibility to distribute MTDs should be left entirely to its prerogative, along with the appropriateness of any mitigation techniques. The advent of smart metering should have an ameliorative effect on the PAF as a whole, and on those NHH processes that feature among the 'Top 10' settlement risks in particular. By the end of the smart meter roll out, we would expect the PAF focus (for NHH at least) to have shifted to more minor issues and for the costs of managing the arrangements to have reduced commensurately. Of course, the case for continued application of the existing arrangements to legacy metering may be established, but legacy meters themselves will disappear soon enough, through the smart and AMR initiatives, and we do not believe the same level of MOP intervention will be necessary, certainly not for smart meters. We would therefore question the need to change the BSC processes to accommodate smart meters, when smart meters, per se, will have no direct impact on Settlement. Instead, we think efforts would be better focused on reducing (or removing) current levels of prescription - rather than exploring means to make the BSC relevant to smart meters, we should concentrate on developing the Smart Energy Code to meet all smart meter requirements As a supplier, we are to be compelled by legislation to only ever replace smart meters with smart meters, so there will be no reflux of meters from smart to legacy arrangements. Therefore, we would suggest that the BSCPs are restricted in scope to legacy meters and that, for smart, the SEC be preferred." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "We do agree with the analysis in Attachment E, but only insofar as there is need to deliver either solution. As highlighted in our response to Q1, we are far from persuaded that this is the case. In our view, the requirement to pass MTDs between Party Agents will diminish through the smart metering rollout, and have ceased completely by its conclusion. Of course, we recognise some suppliers might wish to continue distributing MTDs through an MOA, but it is very important that others are at least afforded the option of distributing them directly."

ScottishPower	**Do you agree with the proposed change…?** **CP1388** "We do not support the proposal, for the reasons we gave in our previous response." **CP1395** "No, we do not support the proposal as it is both complex and restrictive. Broadly, we would be very unlikely to support any proposal that effectively sought to mandate restriction of a Supplier's right to manage its own meter portfolio as it saw fit. Although we understand the proposer's intent was to minimise system and process impacts, while accommodating smart meters in the BSC baseline, we are not persuaded that any such change is necessary at this time." **Do you agree with the timescales for transfer of data as set out in CP1395?** "Analysis in Attachment E suggests there is no change to the timescales?" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** & **CP1395** "Any process that relies on the distribution of MTDs introduces a risk that the data, in some way, gets corrupted during the process. However, we do not consider that risk to be greater with CP1388 than with the current baseline. Under CP1395, however, we do think this risk will increase, if for no other reason than the additional complexity of its additional steps and actors." **How is your organisation impacted by [this change]?** **CP1388** "As a supplier, we might begin distributing MTDs, which would require changes to both systems and processes. As we also operate MOA and NHHDC services, we will need to respond at a system and business level with regard to those roles. Nevertheless, we fully support the principle of having arrangements that are based on commercial decisions, rather than prescription, and believe that, wherever possible, such activities should be left at the relevant supplier's

ScottishPower	discretion." **CP1395** "While the implementation of CP1395 might result in less immediate change, it leaves suppliers unable to fully exercise their commercial prerogative, tying them to an outmoded agent appointment process." **What are the associated costs on your organisation to implement [this change]?** **CP1388 & CP1395** "We are not able to provide indicative costs at this time." **Do you agree with the implementation approach?** **CP1388** & **CP1395** "We would prefer that neither proposal be implemented, and that the BSC remains, or is made, silent on smart specific matters, which are better catered for under SEC governance." **Any other comments?** **CP1388 & CP1395** "It would seem to us that these proposals are largely founded in concerns about the installation process for smart meters rather than on the treatment of such meters during CoS, where we believe the main focus ought to be. Just as the role of the MOA is changing, so is the use of MTDs. The advent of smart meters will render unnecessary the practise of transferring MTDs between Supplier Agents as part of the CoS process. Instead, the gaining Supplier will simply instruct the DCC to configure the meter to meet the Supplier's requirements - a process that will take place irrespective of the manner in which the previous Supplier had configured the meter. The industry has been at pains to ensure the current baseline does nothing to obstruct the smart rollout. However, in its alacrity, we believe it risks simply replicating the costs, complexities and rigidity of the existing processes, in the new smart arrangements; failing to grasp this one-off opportunity to engineer-out many of the worst inefficiencies. Moreover, we have yet to be convinced by the argument that a 'solution' is needed at this time: how can the BSC as

	it stands be said to prevent the installation of smart meters, when around one million have been installed already? We do not need a workaround; we need an enduring regime that will fully support the installation and operation of smart meters through the mass rollout and beyond. The smart meter rollout extends beyond electricity into gas, and we need a common set of arrangements to satisfy the requirements of both markets. Only the Smart Energy Code can deliver this commonality without risking subsequent misalignment. We, therefore, believe the treatment of smart meters should only ever be set down in the Smart Energy Code. Settlement depends on the provision of timely accurate data, both Meta data and meter readings, and it has been the function of the SVA arrangements to provide a management framework, via the CSDs and the PAF, to deliver that. However, with smart meters, that accuracy will be better assured because the meter itself will provide the data directly to the relevant party. In this regard, it is also worth noting the intention for the Smart Energy Code to go much farther in assuring NHH metering systems than has hitherto been the case through the existing arrangements. Therefore, instead of asking ourselves how to adapt BSCP514 to fit our future needs, we should be asking more fundamentally whether we actually need BSCP514 for smart meters at all. Industry must decide whether it wishes to realise this benefit of the smart rollout by reducing the process steps and actors, or to increase them. It is also very important to 'join-up' the work being done under other codes, rather than having disparate groups looking at different aspects of the CoS process in isolation. To that end we acknowledge Ofgem's work through the CoSEG, and would look to that as offering a more joined-up approach."
Electricity North West Limited	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes, because the MOA will receive the Smart Meter Configuration Details from the Supplier by various methods and then has to interpret this into the D0149/D0150 and distribute to LDSO and NHDDC. We currently have issues with the inconsistency of data between the D0149/D0150 for a site. We then have further

Electricity North West Limited	issues with the data in the D0149/D0150 conflicting with the Registration data provided by the Supplier. The Supplier is the owner of the Smart Meter Configuration Details and communicating to the DCC. The Supplier is also responsible for the registration data held in SMRS, therefore if the MOA send them the Meter Technical Details then the Supplier would have a full set of data for the site. The Supplier could validate this data and ensure it is consistent prior to distributing it out to all other parties. This would also mitigate the Supplier not knowing which set of dataflows they are expecting to receive or which party to contact in the case of missing MTD's as suggested in CP1395." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes" **Do you agree with the proposed change…?** **CP1388** "Yes, we believe that this proposal will be a simpler process for Smart Meters and for the future. It reduces dataflow traffic and the two new dataflows are clearly independent of one another. CP1388 provides a clean end to end solution for Smart Meters and reduces the risk to settlements as Suppliers will be responsible for all the data. Although the costs of implementing this maybe significant for some organisations." **CP1395** "No, not in its current form. We believe that there should be a standard dataflow between the Supplier and MOA to provide the Smart Meter Configuration Details, this provides consistency of data requirements and audit trail and less chance for human error than with a manual process. We have a concern whether this is compliant with P292 or align with DECC's SMIP Operating Model, as the Supplier should be responsible for sending of the Smart Meter Configuration and Technical Details. A further issue is that the D0149/150 currently have to be sent as a pair (except in a meter removal only), in the scenario of a Smart Meter Configuration only change the D0149/150 would have to be sent. In CP1388 the new

Electricity North West Limited	dataflows are not dependent of one another. Also in the CoS and Change of Agent scenario parties would receive the D0149/150 as now. Data volumes are reduced by CP1388." **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "CP1388 would reduce the risk to settlement as the Supplier is responsible for sending the data to relevant parties and carrying out validation between the dataflows prior to sending to parties. The new dataflows introduced for this CP have been designed to not have duplicate data items (as is with the D0149/D0150). Therefore there is no risk of inconsistent data between the dataflows. The Supplier is responsible for the Registration data to SMRS and sending of the D0205, this can be validated against the two new flows prior to sending to ensure all data is consistent." **CP1395** "As mentioned in Attachment E CP1395 adds a extra step into the process which already does not work well and is in the Top 10 Settlement risk under Performance Assurance Reporting." **How is your organisation impacted by [this change]?** **CP1388** • "Need to understand Smart v Legacy • New processes required as Supplier now responsible for sending new dataflows • System Functionality and validation Changes • Receipt of new dataflows • Sending of new Smart Meter Detail dataflow if Distributor has removed the meter. Consideration has also been given to the following outstanding issues that impact Smart Meters;

Electricity North West Limited	• Charging Methodology for billing Smart Meters HH • De-linking the Settlements process • Will new Measurement Classes be introduced to support aggregated HH data?" **CP1395** "No" **What are the associated costs on your organisation to implement [this change]?** **CP1388** "We estimate the costs of these changes to be between £150 – 250k based upon the assumptions made earlier in this response." **CP1395** "N/A" **Do you agree with the implementation approach?** **CP1388** "Yes, because this provides us with at least one year to implement and is prior to the Smart Meter Roll out." **CP1395** "Yes, because this fits in with the timescales for Smart Meter Roll Out" **Any other comments?** **CP1388** "We have made the assumption that in the scenario were the Distributor has removed the smart meter that we will have the ability to send the Smart Details Detail flow with Smart Meter removal details populated only to the Supplier. Is this assumption correct? What will happen with regards to existing Smart Meters that have already been installed? Should these result in a need to send the new dataflows retrospectively?" **CP1395** "Once the meter is installed and the Supplier wants to carry out a configuration change would the D0149/D0150 be sent as a pair? We assume so because legacy changes also need to be followed i.e. non smart to

	non smart."
EDF Energy	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes because the MOA distribution approach as described would increase the number of times that configuration data needs to be transferred between parties, which increases the risk of data loss and amendment. Data will need to be transferred from the DCC to the Supplier, from the Supplier to the MOA and from the MOA to the NHHDC and LDSO, and each transfer may involve some manner of data translation in order to meet dataflow formats. An approach whereby the party responsible for configuring a meter (which is always the Supplier) can directly send that information to the market participants that need it for settlements purposes, and specifically the NHHDC, would seem to be more efficient and have a lower level of risk associated with it." **Do you agree with the analysis of both CPs presented in Attachment E?**
EDF Energy	**CP1388 and CP1395** "Yes. While we agree with the majority of the points made in this analysis, we would like the following additional considerations to be noted: • General – the analysis tends to focus on the issues associated with the installation of a smart device, however we believe that the two CPs have significantly different impacts in terms of the efficiency and accuracy of the Change of Supplier process which is very dependent on the transfer and distribution of MTDs, and should form part of any analysis of the options. • Distribution of MTDs – This section implies that MOAs have the capability to configure a smart meter locally would send this configuration information to the Supplier on the Smart Meter Configurations flow. This is not the case, as per the security model the MOA is only able to deploy a configuration command created by the Supplier to the meter via an HHT, and return the response from the meter to the Supplier for translation. This means that the Supplier is the only party that is actually able to programme a meter, although the

EDF Energy	delivery mechanism may vary, and this needs to be made clear when considering these changes. We believe this serves to reinforce the ownership of smart MTDs by the Supplier. • Distribution of MTDs – The section on CP1395 refers to use of the Smart Metering Configuration Details for communication of this data to the MOA – creating this flow has significant costs which would then seem to go against the minimal change approach that CP 1395 is supposed to represent – if parties still need to make significant system changes with no apparent benefit we believe this should be noted in this analysis. • Distribution of MTDs – We believe that there are clear benefits to be gained in terms of settlement processing which are not highlighted in this section. This section does note that CP1388 allows the Supplier to send the configuration details without sending the device details and the benefit that this has in regards to meter installation. In addition to this we believe that this ability also creates a very significant benefit on any change of Supplier as the new Supplier will be able to configure the meter and send those details out to the NHHDC without waiting for MTDs to be transferred by the old Supplier (or their MOA). This then allows the Supplier to be able to pass accurate information to the NHHDC for use in settlements on a timelier basis as there are no dependencies on the transfer of data from the previous Supplier, this will improve the quality of data used in early settlement runs (especially SF/R1). • Notification of the removal of a legacy meter – We believe it should be noted that the same group as used in the D0150 for meter removal (08A) is proposed for use on the smart device details flow, from the point of view of system processing logic there is no difference between the Smart Device Details and D0150 flows, or at least not one that we would regard as material. • Communicating of non-Settlement configuration – As per the comment above, this implies that MOAs are able to locally configure a smart meter, which is not the case. • Installation – change of functionality and removal of Metering System requests – we do not believe that the reference to a mandated dataflow in the analysis of CP1388 is correct, this flow should not be mandated (as parties may choose to agree an alternative, especially if the Supplier an MOA are the same organisation), however providing a standard method of communication supports MOAs that operate for multiple Suppliers

EDF Energy	and Suppliers who need to appoint MOAs on the basis of a customer contract. We believe that CP1395 is overly reliant on bilateral arrangements for the communication of information (specifically of configuration information that is critical to settlement), this increases the risk that data may be misinterpreted and create errors in settlement, and that it makes it much more difficult to get assurance (for example through audit) that the data being used in settlements accurately reflects the configuration of a meter. • Possible subsequent change – We strongly believe that further work is required in the area of Change of Supplier to build on these changes, this is specifically in regards the data that needs to be transferred between Suppliers and/or Agents on a CoS event. We believe that the changes to MTDs detailed in CP 1388 offer a significant opportunity to reduce or eliminate the amount of data that is transferred unnecessarily on CoS and enable a more robust, more effective and more accurate CoS process, one which is an improvement on the current processes from both a settlement and also a customer experience point of view. The changes to MTDs proposed in CP1388 provide a significant opportunity for further improvement in this area and we believe that this should be noted in any analysis." **Do you agree with the proposed change…?** CP1388 "We support the changes and believe these are required to make the processing of Smart Metering data efficient and effective between parties. We do however have comments on some aspects of CP 1388 which were submitted when this change was first issued for impact assessment, these comments are repeated below. We certainly believe that CP1388 is a preferable solution to the issue of MTDs to that proposed in CP1395, in addition to the issues and risks highlighted in Elexon's analysis of the CPs we do not believe that a minimal change approach for smart metering enables benefit to be gained from the installation of this metering, especially in regards to the timeliness and accuracy of the data that is used in settlements. While we note that there are potential future changes in this area that might arise through Ofgem's Smart Markets programme, our involvement in that programme indicates that the changes that they are considering changes that are conceptually similar to those

EDF Energy	detailed in CP 1388. It should also be noted that the Smarter Markets programme is not looking to deliver significant changes until around 2018; we do not believe that it is acceptable to install over 10 million smart meters in this period and to operate them using sub-optimal processes that is some areas actually increase the risk to settlement. Our comments on CP 1388 are: 1. On the appointment flows (D0155) we believe there should be a flag to show that the meter is being operated in a "Smart" Mode. This will enable more efficient processing of both Smart and Dumb meters in a dual process which will be required at least until 2020 (and possibly longer as it will not be possible to install smart meters at all premises). For instance under current processing when the MOA receives a D0155 in a Dumb process they will be expected to trigger the subsequent required flows. However if the meter is being operated as Smart then the MOA will wait for MCD information from the supplier to before continuing with their process. A suggestion for the flag could be "S" for Smart, "N" Non-Smart Non Half Hourly, "A" AMR, "H" Half Hourly, "X" No Meter on MPAN. In order for this to be practical Suppliers would need to be able to access that information prior to appointing an MOA. To minimise timelines in CoS most appropriate data source would be from ECOES but to do that a triangulation process, as proposed during Customer Transfer Programme would be required. Another option would be that Suppliers pass this information immediately even if they later object to a transfer. If not this flag would be reliant on customer knowledge as part of sign-up process and that could lead to additional problems. 2. We do not believe that the process for meter removal (permanent or on a meter exchange) is clear enough, especially in regards to whether a meter reading would be required from the MOP or whether one would be taken by the Supplier. This needs further clarity in the BSCP. Also while the changes in the CP reference change to the routing of the Initial reading of the dumb to smart exchange; it is not clear what would happen to the Final reading on the legacy meter being removed. We assume this would go via the existing route (MOP -> NHHDC -> Supplier) which is fine but needs to be explicit. 3. We have a question as to which flows would be sent between parties if there is no meter on-site, either because it has been removed or because no meter has yet been installed (new connections). If the last meter removed was a smart would this be a 'short' Smart Device Details flow or a 'short' D0150, again we believe these should be clarified in the BSCP. Please refer this point to point 2 as well.

EDF Energy	4. We have a question as to whether the current MDD process would be appropriate for maintaining the valid lists of Smart Meter Manufacturer, Smart Meter Model and Smart Meter Version for validation; will changes be able to be made in enough time? One model that could be used is that for Outstations (where the updates lists are published on the Elexon web-site). A related question is who would maintain the list of valid devices, this might need to be managed under the Smart Energy Code (SEC) who will approve new smart meters are fit for use. 5. We believe further work is required on the CoS process to build on these changes. We question whether these changes on their own are sufficient to allow metering and configuration information to be sent effectively between parties on a timely basis. We also feel the proposed CoS reading process is very complex (noting that CP1395 is not significantly better in this regard) and may face difficulties in operating effectively, and potentially a further change will be required to build on the foundations that this CP sets. We believe that the old supplier should be responsible for getting their own read as the new supplier may not be able to deal with the old meter configurations. We feel that the security requirements will not allow a new supplier to take a read on behalf of the old supplier, and therefore makes the current processes redundant. While we support the principles of CP 1388 we believe that a further working group will need to be set up if this CP is approved to finalise the red lining of the BCSPs and ensure they are fit for purpose before being issued, given the number of low level comments that we (and presumably other parties) have made it would seem sensible to ensure that the drafting is correct and accurately reflects the principles of the CP." **CP1395** "While we agree that this a viable solution to the issue at hand and could be implemented, we do not believe that this change is appropriate due to the risks and issue noted in Elexon's analysis of the two CPs, and the further considerations we have documented in our response to CP 1388. We feel that the industry should be making changes to ensure that processes are suitable for the new technology that is being implemented as part of the smart metering rollout and maximise the benefit to be gained from that technology. We do not believe these benefits can be gained from the 'minimal change' approach, and that a failure to deliver benefits through the rollout of smart metering from the beginning of that rollout could jeopardise the success of the overall Smart Metering Implementation Programme."

EDF Energy	**Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388 & CP1395** "We agree with Elexon's analysis of the settlement risks." **How is your organisation impacted by [this change]?** **CP1388** "Our NHHMOA, NHHDC and Supplier systems will require changes to be made, although full impacts are not yet known, these are likely to be significant and will require sufficient lead time to make these changes. We will also need to make changes to internal business processes in order to manage the requirements of these changes, which will require staff training." **CP1395** Our NHHMOA and Supplier systems will require changes to be made, although full impacts are not yet known, these are likely to be significant and will require sufficient lead time to make these changes. We will also need to make changes to internal business processes in order to manage the requirements of these changes, which will require staff training. It should be noted that while the changes on CP 1395 have a lower impact than CP1388, the scale of the change is still significant as a new interface between the Supplier and the MOA will need to be developed (which makes up a significant proportion of the cost of CP1388), and significant changes to our MOA systems to enable the processing of this information will be required which are more significant than under CP1388. "" **What are the associated costs on your organisation to implement [this change]?** **CP1388** "A full impact has not yet been established as to the cost of change; however these are likely to be significant.

	It should be noted that, while the costs of this change might exceed those of CP 1395, the benefits to be gained through this approach justify this additional cost." **CP1395** "A full impact has not yet been established as to the cost of change; however these are likely to be significant. It should be noted that, while the costs of this change might be lower than that of CP 1388, the reduction is not that significant due to the changes detailed above." **Do you agree with the implementation approach?** **CP1388** & **CP1395** "Yes because the system and process changes are significant and will require time to develop and implement. While this change does have a direct relationship with the implementation of the DCC (scheduled for Q4 2015) we believe that there is benefit to implementing these changes earlier, to support those smart meters rolled out in the Foundation phase."
SSE	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "No, if anything we see CP1395 as a significantly lower risk to Settlement as it utilises existing flows and processes." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Given the number of work group meetings held in respect of CP1388 and the fact that the only analysis completed on CP1395 has been by Elexon, we think it would be sensible to hold multi party workgroup meetings to discuss CP1395. This would ensure that all Parties have the same understanding of the proposed change CP1395."

SSE	**Do you agree with the proposed change…?** **CP1388** "No, we disagree with the need to introduce separate Smart specific dataflows to request changes to Smart Metering and exchange Meter Technical Details. We still firmly believe that further work would be required for the proposed change CP1388. For completeness, we have provided information relating to our concerns with the proposed change. Key feature 1 - We believe that the taking of a final/install meter reading should continue to be mandated as an obligation on the MOA. This can be re-visited and assessed under a separate CP once the DCC processes and services are established. Key feature 2 – We disagree with the proposal to use the Smart flows for removal of legacy metering. The D0150 dataflow should continue to be sent by MOA to notify the removal of the legacy Meter to relevant parties. Key feature 11 – We disagree with this statement. The MOA should be obliged to issue the Meter Configuration Details flow to the Supplier when the meter is locally configured. There may be ongoing reasons that comms to the meter is unavailable, and without this information, the Supplier will have not received the necessary confirmation of what is physically configured on the meter. Key feature 13 – We disagree with the introduction of the new dataflow 'Smart Equipment Work Management Request'. Suppliers can continue to use the D0142 or make their own arrangements with their Meter Operator as per the Bilaterals already currently in place. In the event of a new flow being introduced, the Comms/IHD datagroups do not need to be mandated and these need to be Optional. Key feature 14 – This CP and its impact assessment, should handle the unsuccessful instances also as part of its scope. The scenario for missing flows needs to be added to the relevant BSCP, as well as incorporating the necessary DTC changes. Key feature 16 – We believe that further changes to PARMS Serials should be pended until the Smart changes are

SSE	complete. This would allow the recent changes to the Serials to bed in and ensure that the changes required are efficiently and effectively identified to minimise unnecessary change." **CP1395** "" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "Introduction of new flows, not covered by existing PARMS and it would be a new Party sending meter technical information." **CP1395** "Lower risk to Settlements than alternative CP1388 as it utilises existing flows." **How is your organisation impacted by [this change]?** **CP1388** "Impacts to IT systems, processes and internal training." **CP1395** "From an IT aspect there is an impact, however this is less than the alternative CP1388. There would be process changes and training requirements, however these would be an extension to our existing capabilities rather than introducing brand new dataflows and processes." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "High costs" **CP1395** "Low to medium cost." **Do you agree with the implementation approach?** **CP1388** "Yes"

SSE	**CP1395** "Yes" **Any other comments?** **CP1388 & CP1395** "We support CP1395 and do not support CP1388. We would however suggest our proposal to hold work group meetings for CP1395 is taken forward, as set out in Question 2."
Total Gas & Power	**Do you agree with the proposed change…?** **CP1388** "TGP believes CP1388 is flawed, problematic and represents a significant risk to Settlements, the Change of Supplier process, exception management and resolution. We also believe that it is moving all Suppliers into a position of having responsibility for managing MTDs, presently managed by NHHMOPs, and we believe these obligations would be an inappropriate and significant burden, especially for smaller suppliers and this could impact competition. There is little or no benefit for independent Suppliers and introduces new risks and confusion." **CP1395** "CP1395 is much simpler and leaves the responsibility for MTDs with the NHH MOP and in the same flows, the 149s and 150s. (CP 1388 would have separate parallel processes and new data flows for Smart and dumb meters for years into the future and TGP believes that this would cause confusion.)"
Haven Power Ltd	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "No. MOAs are far more versed in this area than suppliers and have the systems in place to implement this change without considerable development and upheaval. We feel any potential points of failure would be far less employing a "minimal change" approach than the implementing the changes proposed by CP1388 which would have to run in parallel with legacy systems. Running two systems in parallel would have an equal level of complexity at the very least."

Haven Power Ltd	**Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes" **Do you agree with the proposed change…?** **CP1388** "No" **CP1395** "Yes" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "CP1388 introduces responsibilities to suppliers that have previously not been experienced. This, coupled with the fact that legacy processes will need to be maintained at the same time introduces a level of complexity which will lead to information not being provided to the relevant parties in a timely manner. This failure will result in energy being incorrectly allocated in settlements." **CP1395** "None- This is simply an update of the current process and therefore new issues should be avoided." **How is your organisation impacted by [this change]?** **CP1388** "As a small non-domestic supplier we would be required to run two systems in parallel and make significant systems changes. We would also need to recruit additional expertise to run these systems in parallel and to resolve the increase in queries we believe that this solution will result in." **CP1395** Did not say.

British Gas	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "No we do not agree that a MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a supplier distribution process. CP 1388 represents significant change to the as-is model, processes and systems. It will require parallel running of dumb and smart processes and require additional complexity in determining the source of missing data for escalation purposes. The MOA distribution approach includes only one new data exchange (i.e. remote configuration details for supplier to MOA) and any perceived additional risk to settlement could be mitigated through the implementation of appropriate controls." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Please see below our response to your analysis" <u>Dataflows</u> "We disagree that the risk to settlement under CP1388 is equal to the risk under the current arrangements. Suppliers are already installing smart meters and have built systems and processes to inform their MOA of configuration details set up on their meters. Under CP1388 a completely new model will be put in place with new relationships and interfaces which we believe could introduce new risks to settlement which are not experienced today. We do not agree that CP 1395 will cause increased DTN traffic as suppliers may choose to communicate MTD details via internal flows via bi-lateral arrangements. We do not agree that keeping the responsibility for populating the D0149/D0150 with the MOA under CP 1395 will increase the risk of error."

British Gas	Distribution of MTDs "Introducing a new process for suppliers to send MTDs to DCs and DNOs will mean suppliers will need to operate parallel processes for both smart and legacy meters which we believe will add additional risk and cost. Under CP1388 parties may not know who to chase for missing flows because they may not have the information to determine whether they are dealing with a smart or legacy meter. We do not agree that by leaving the responsibility for distributing MTDs with the MOA will introduce additional risk into settlement. It is in the suppliers interest to ensure the correct details are passed to it's meter operator to ensure the correct details set up under the settlement systems. The MOAs are the current industry experts for MTDs and leaving the responsibility with MOAs does not add any additional risk to settlement." Meter Readings "Industry parties today have to deal with the scenario where meter readings are received before the MTDs. They have processes and procedures to deal with this eventuality today. Therefore CP1395 adds no risk to this issue." Notification of the removal of the legacy meter "CP 1395 represents no change to the current process. Parties will need to amend systems and processes to deal with the new proposed flow under CP1388 therefore both smart and legacy metering systems and processes are impacted." Communicating energisation status

British Gas	"CP 1395 states that meter configuration details must sent from the supplier to the meter operator within 10 working days. In practice suppliers will send this information much quicker than this." Timescales for communicating MTDs "There is no evidence to suggest that CP1388 will result is faster and more timely provision of MTDs to the NHHDC that CP1395. There are performance assurance techniques that could be employed under either option to ensure performance is at the required level." Obligation to communicating the later configuration details "We would not oppose amending the red lined drafting to include an obligation to ensure meter readings are not sent by the supplier until new meter configuration details have been received by the NHHDC." Installation change of functionality and removal of Metering system requests "CP 1395 does not preclude the introduction of a additional standard flow under the MRA which can be used to notify the MOA of these details." **Do you agree with the proposed change…?** **CP1388** "No, we would prefer to see the current arrangements maintained whereby the MOA retains responsibility for the maintenance and communication of MTD. The MOA has the necessary experience and expertise to continue to fulfil this activity on behalf of suppliers. We believe it is premature to include these provisions into the BSC today whilst we are still discussing as an industry how we can leverage the benefits of smart metering in both reforming the change of supply process and in settlement reform.

British Gas	Much of the information currently populated on the D0149 and D0150 will be directly accessible via the meter therefore the requirement to transfer these details around the industry may diminish significantly in the future. In addition it is possible that registration, data processing and aggregation will be centralised into the DCC 2-3 years post the initial go live. If this happened the MOA data responsibilities may transition to some kind of centralised data repository, potentially within the DCC registration systems. We would need to make significant changes to support CP1388 which if the above reforms took place would mean the changes would have a minimal shelf life causing the industry additional costs for no real benefit. Therefore referring to the stated overarching principle we believe retaining the MOA as responsible for maintenance and communication of all MTDs is the "minimal change" option. We also note that in the earlier industry consultation on Meter Technical Details a number of smaller Suppliers indicated that they would prefer the existing arrangements to continue." **CP1395** "Yes. This change represents the minimal change option and would ensure additional costs are not incurred by parties unnecessarily." **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes" **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "CP 1388 creates a new relationship between parties. Suppliers will have to build systems and change processes to be able to distribute MTD to other parties. This adds additional complexity to the process as currently designed and could add additional risks to settlement." **CP1395** "Under the new smart arrangements Suppliers will send configuration messages to their meters via the DCC. Once these messages have been executed by the DCC the supplier will receive confirmation that the new configuration details have been loaded onto the meter. CP 1395 proposes that these configuration details are then

British Gas	passed to the meter operator for distribution to other industry parties. We do not believe that this process will add any additional risk to settlement over and above those that exist today. However should industry feel additional comfort is required then there are performance assurance techniques that exist today could be employed to mitigate any risks." **How is your organisation impacted by [this change]?** **CP1388** "Meter Technical flows are currently the responsibility of the MOA to send out to other industry parties. As a supplier we will need to make significant system changes to enable the new proposed flows to be sent. These changes will impact the following systems for both our business and residential IS infrastructure: Asset management systems Registration and billing systems Flow management systems Meter operator interfaces Potential changes to contractual arrangements with meter operators Impacts on customers with customer appointed meter operators" **CP1395** "We believe that CP1395 represents the minimal change approach and as a result the impacts to British Gas are minimal." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "We have been unable to carry out a full detailed costs analysis but we have been provided with a high level management estimate of between £500k and £750k to make these proposed changes across all the systems detailed above." **CP1395** "If it is decided that a standard industry flow is required to transfer meter configuration details from the

British Gas	supplier to the MOA then some additional costs would be incurred. We estimate this to be in the region of £50k" **Do you agree with the implementation approach?** **CP1388** Didn't respond **CP1395** "Yes" **Any other comments?** **CP1395** "We do not agree that "no change" is unacceptable. If industry is unable to support the implementation of CP1395 we would support the "no change" option ahead of CP1388. We believe the current arrangements can support the introduction of smart meters until more clarity is obtained as to the future reforms possible in both change of supply and settlement reform."
E.ON	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes. The completion of the D0150 and D0159 by the MOA, based on data passed to it from a Supplier, introduces added risk of data becoming unaligned. It also adds complexity to problem resolution as errors have to be tracked back through to the originator who will be an extra step removed from the realisation of the error. There is also added risk where meter readings and configuration details are sent separately to the NHHDC. This creates a timing issue and the potential for readings to be misinterpreted in the event that a read is received before configuration details. The holding of reads by the NHHDC, until receipt of configuration data is a further source for error as the two sets of data may not be paired (introduces delay) or potentially be paired incorrectly. We also believe there is greater risk with a less defined demarcation between smart and dumb meters, which may lead to errors being carried forward into future smart processes.

E.ON	We do not believe that it is appropriate to increase the risk of errors into the new smart operating model when a guiding principle for the introduction of SMART metering is to improve the quality of data within the market." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes. We believe the analysis is a fair representation of the changes." **Do you agree with the proposed change…?** **CP1388** "Yes" **CP1395** "No" **Do you agree with the timescales for transfer of data as set out in CP1395?** "Yes. We believe that the existing timescales for communication are appropriate in the first instance." **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "We do not believe that CP1388 poses any greater risk to settlements than the existing processes. It minimises new risk in that both meter readings data and configuration data is sent by a single source who is the originator." **CP1395** "We believe that the additional handoff of data required by CP1395, the replication of data from a primary source to further flows and the division of data between two flows increases the risk to the integrity of settlement data. The greater risk of misinterpretation of readings due to NHHDC's having to pair configuration data from the NHMOA and read data from suppliers would also add additional risk to settlements."

E.ON	**How is your organisation impacted by [this change]?** **CP1388** "As Supplier and NHHMOA." **CP1395** "As Supplier and NHHMOA. Although CP1395 utilises much of the existing process, it still requires a dumb and a smart process to run concurrently which means that there will still be the need for system changes and agent training. We also believe that there would be increased demand on NHHMOA's and suppliers in order to resolve issues, as it would be less clear where and who the error originated from." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "Whilst detailed costing have not yet been agreed, the project to implement the change would likely be a medium sized project. CP1388 does require a reasonable amount of change, although we believe that this is justified in order to maintain the integrity of the new SMART market and ensure that efficiencies set out in DECC's Smart meter roll-out for the domestic and small and medium non-domestic sectors (GB) Impact Assessment are realised. Again, whilst costs are not insignificant, we believe the benefits of introducing CP1388 are justified." **CP1395** "Although the costs would be lower in implementing CP1395, we do not believe this will be significantly so. This is because the change will require significantly more regression testing given its use of existing flows as opposed to the new flows and wider training as the work could not be 'ring fenced' as the demarcation between dumb and smart is not as clear. We believe this project would also fall into the medium size category although at the lower end of the scale. We also believe that any costs saved in delivery would be lost in inefficiencies and more complex problem resolution."

E.ON	**Do you agree with the implementation approach?** **CP1388 & CP1395** "Yes" **Any other comments?** **CP1388 & CP1395** "We strongly believe that in order to protect the integrity of the new smart processes, a more comprehensive solution is required. Existing processes do not support the change in role for the NHHMOA under smart and while we appreciate CP1388 will be at additional cost, we believe that this is justified both in reduced risk to current settlements, increased efficiencies and ensuring cleaner data to pass through to new smart processes."
Npower	**Do you agree that an MOA distribution approach would be more complex and have more potential points of failure that could not be appropriately mitigated than a Supplier distribution process?** **CP1388 & CP1395** "Yes. However, those points of failure exist in a traditional world at present. Further improvements to Meter Technical Details distribution could be introduced at a later date based on smart rollout experience and testing with the DCC or ahead of an enduring solution when registration is brought into the DCC. This would then be based on evidence rather than assumption." **CP1395** "Also, with the Meter Operator being informed of the configuration of the meter they will be better placed to take makes sure they collect all the register readings if requested by Supplier when attending site. This will also aid Suppliers in achieving their Supplier Licence Condition 12 obligations." **Do you agree with the analysis of both CPs presented in Attachment E?** **CP1388 and CP1395** "Yes in most cases. We feel that some of the risks presented in the analysis exist in today's traditional world. Considering the implementation costs associated with CP1388 we don't feel that this is guaranteed

Npower	to be an enduring solution and therefore may require further changes which would also be costly, this should be identified as a risk. In CP1395 there is a risk that the meter readings provided to the NHHDC by the Supplier may fail validation whilst waiting for the D0149 / D0150 from Meter Operator and corresponding D0052 from Supplier. This is based on the assumption that the Supplier provides the NHHDC with the Final and Initial readings as soon as they have received confirmation that the new meter configuration has been applied via the DCC gateway – this has not been captured. In addition, whilst we recognise that there is less flow change via CP1395 there are still significant process change. Also, as the Supplier is the owner of the Meter Configuration Details data but needs to wait for D0149 from Meter Operator before sending D0052 to NHHDC, the additional steps could impact the overall industry timescales. Our recommendation would be to create process maps highlighting both solutions and how they would the timescales would map out as this will assist in determining which solution is best." **Do you agree with the proposed change…?** **CP1388** "See npower's original response to CP1388." [npower have previously advised that it supports CP1388 with caveats, stating: "We support the intention of the change and understand the need for some of the proposed changes to support industry testing and mass rollout. However, given the volume and nature of the comments raised below and also that the proposed changes will not encompass the end to end processes, e.g. change of measurement class, there is a concern regarding the risk / benefits of making these changes in isolation. We would like clarity on the points we have raised within our response so we can take confidence in the roadmap towards an enduring solution whilst maintaining the integrity of Settlement during the transition towards mass rollout and beyond. We feel that the making the proposed changes in isolation will leave some processes within the BSCP(s) un-usable. We would also like a clear understanding of the contentious items of this CP so we have a view of areas of the proposal that have a high risk of further change so that we can plan our own changes accordingly."]

Npower	**CP1395** "We feel this is a better solution than that presented in CP1388 as there is less change for parties to implement. Also, we feel this 'least change' approach would allow for future changes to be made to industry processes that are based on evidence rather than on what is "believed" to be the best solution. However, we feel that CP1395 still come with risks. Whilst outside the scope of the BSC, we feel that the impact on customers must be considered and the successful solution should be one that does not impact the benefits to the customer of Smart Metering or the customer experience during the installation process." **Do you agree with the timescales for transfer of data as set out in CP1395?** "We feel it would be beneficial to see the timescales mapped out end to end for each solution to understand whether they are acceptable to industry. This would highlight any areas where process delay would become a problem and highlight any conflicting timescales. Also, the timescales need to be mindful of the customer experience." **What risks to Settlement do you believe may be a result of implementing [this change]?** **CP1388** "See npower's original response to CP1388." [npower have previously provided additional comments, which include reference to Settlement Risk. It has advised: "'The MOA will provide the Smart Device Details to the Supplier when a Smart Meter is installed, replaced or removed or when any changes are made to the Smart Device Details.' We can foresee certain scenarios where changes are made to Smart Device Details which are outside the knowledge and control of the MOA after the initial installation so it seems unreasonable to expect the MOA to always provide updates. If a Supplier adds a new device to the HAN, e.g. an advanced IHD, then the Supplier would need to update the MOA with details of the changes to allow them to send an update flow to all relevant parties and party agents but the BSCP does not detail a process for this.

Npower	'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).' We would like a definitive list of scenarios where the transfer of flows is mandated so it is clear in all instances and would protect the integrity of Settlements. The optional nature of sending data flows will add further complexity and cost to already complex system and process. Without the list of scenarios we would advocate that the whole Supplier Hub should be updated and can choose to use the information or not (for example, the way NHHDCs currently process D0149/D0150 where no data items have changed). We also feel that further consideration should be given to shifting responsibility for updating Supplier Hub with the Smart Device Details flow from MOA to Supplier. As the MOA are owners of the Smart Device Details it would be more efficient and less change for them to continue to distribute and they would be better placed to address any queries arising, e.g from the LDSO. However, this should be considered alongside the comments made in point 3 above. 'Whenever there is a change to the Meter Configuration Details, the Supplier will forward the Meter Configuration Details to the NHHDC and LDSO (and optionally to the MOA).' We feel that the optional nature of sending data flows will add complication and cost to already complex system and process changes and would advocate that the whole Supplier Hub should be updated and can choose whether to use the information or not. If the MOA needs to attend an emergency site visit (where the Supplier does not request the appointment), then the MOA will require the Meter Configuration Details to map end readings to the correct Meter Register IDs. Incorrect mapping will result in errors in Settlements and billing. In addition, the MOA will require Meter Configuration Details to undertake tasks such as fault investigations and it would be easiest if these were always available, rather than on request. We also note that there is no mechanism prescribed if the flow is to be optional for the MOA to request the details should they be required.

Npower	'The scope of this Change Proposal excludes the change of Measurement Class 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 HH metering. These processes are likely to be subject to a subsequent Change Proposal'. We feel that the exclusion of the CoMC process creates a BSCP that will prevent CoMCs between Smart and HH. We understand that this will be addressed by subsequent changes but feel that in the interim there is a risk without having a defined CoMC process for Smart to HH. Usage of the D0052 – We feel that this CP has only reviewed the usage of the D0149 and D0150 flows. We feel it must also review the D0052 process for Smart meters as it is often the processing of these three flows together that is an integral part of the processes that are being changed by this CP. The D0052 process still causes problems in industry processes, Settlements and billing. We should use this opportunity to improve and simplify industry processes and this change should be the catalyst for incorporating a review of the D0052 processes along side this Smart Meter Technical Details proposal. Could additional data items be included in the Meter Configuration Details flow that would make the D0052 redundant for Smart? Simplicity of process – With the advent of Smart Metering the industry has the opportunity to simplify some of the complex Settlements processes that are part of the obligation we perform today. There are elements of this CP that do not take this ethos into account, specifically relating to the optionality of flows and the suggestion that Supplier will be able to make more than one Settlement effecting change in a single day. Whilst we understand that a large amount of change is needed for the Industry to be able to support Smart Metering we feel that this CP is lacking in some areas of change (see usage of D0052 flow point), but in other areas has shoe horned in further complex change (such as a new CoS process). We would like to see further supporting information specifically relating to the new proposed CoS process, we feel it is more complex than the process today and feel a supporting timeline or process map should be produced by the industry to enable the participants to understand this new process in detail before we can agree to the change with confidence.

Npower	Optionality of flows – We need consistency in the industry, especially with the advent of Smart. We would like a definitive list of scenarios where the transfer of flows is mandated so it is clear in all instances and would protect the integrity of Settlements. The optional nature of sending data flows will add further complexity and cost to already complex system and process. Without the list of scenarios we would advocate that the whole Supplier Hub should be updated and can choose to use the information or not. Initial and Final Reads from Supplier - General comment regards remote meter readings from Supplier. Currently a Data Retriever / MOA allocate a Reading Type (Data Item J0171) when manually obtaining a read from site. As the remote meter reading will come from the Comms Agent / DCC (the Smart Meter System Operator - SMSO), is it expected that the SMSO will set the appropriate Reading Type (Data Item J0171) against the reading or will it be the Suppliers responsibility to ensure that the correct read type is set against the reading (particularly for the scenarios where the read is needing to be a Final or Initial but also for Actual / Routine)? Where meter readings have been taken remotely via the DCC or Comms Agent, what read types will be used? The proposed changes move obligations away from BSC Agents and onto Suppliers. Currently, the BSC Agent(s) are heavily audited against the processes within the BSCP(s). If these changes go-live that will increase the work for the BSC Auditor as they will need to continue auditing BSC Agents in the same way for Traditional metered sites and then increase their scope on the Supplier Audits for those sites with Smart meters installed. Any proposed Smart change must not place un-necessary risks on the integrity of Settlements and would hope to that the Performance Assurance Framework can be altered and strengthened during the transition period whilst ELEXON operate processes for both Smart and Traditional sites – maintaining the intergrity of Settlements. The changes proposed in CP1388 will make significant changes to BSC Agent and Supplier systems. We feel when

Npower	assessing, BSC Agents may deem these changes as being significant, thus triggering a re-qualification. This could be mitigated by carrying out industry testing. The same approach should be taken for Suppliers who at present do not need to re-qualify – we would also expect this to change as more responsibility for Settlement effecting processes moves to the Supplier. Again, work will be needed on the Performance Assurance Framework to provide the industry with confidence that Settlements remain as well protected as they are today. Will there be prioritisation on multiple readings received by the Supplier on the same date across different sources, e.g. MOA provided read and remote read via comms agent and customer own read all received on same day – which of these should be passed to NHHDC for Settlement validation? The Smart Equipment Work Management request dataflow has SSC, MSNSFC and Requested Energisation Status at Meter level rather than MPAN level. Why? Can these items differ across meters on the same MPAN? This has a very significant impact on existing functionality. Clarification on the relationship of the SSC – is this 1:1 to the MPAN, or could there be multiple SSCs to an MPAN? More definition is required for exception management surrounding Change of Agent details (involving new SMART agents) where there is missing MTD history. Clarification within CP1388 key points that Supplier will notify energisation status. Current draft indicates MOA to communicate this detail. Clarity is required within BSCP504 for Energisation / De-Energisation sections for energisation status on the Meter Configuration Details flow. Also, more clarity is required around the meter disabling process and how other market

Npower	participants would be notified. (For example - the impacted parties include the Data Collector via D0095s). Comments on the numbered key features of the proposed solution (pages 2-3): • Point 1. Should read "MOAs will not be mandated". However, we anticipate that Suppliers may make it mandatory in certain scenarios, e.g. to demonstrate compliance with LC12 safety visit obligations. • Point 4. We believe the NHHDC will need to know certain information contained in the Smart Device Details Flow, e.g. meter location when there is a requirement to perform a pedestrian meter reading and also to validate the information contained in the Meter Configuration Details flow to protect Settlements. • Point 5. The Supplier is not in control of the energisation status of the meter, it is the MOA that has ownership and control over this status and there are D0139 processes that work today to ensure the Supplier, NHHDC and LDSO are updated accordingly. The Supplier will be in control of the enable / disable process, is this the point that is being made here? If so NHHDC need to know whether they should process a zero advance meter reading (or whether there is an error) and BSCP504 contains no processes that mandate the use of this data item (which is also not part of the MRA data set of J items). Please clarify the point this bullet is making. As it stands we would expect Supplier to be mirroring the current expected Energisation Status in these flows. If there is a change then we would agree that the D0139 is the correct method for that update to be passed between participants. Is this a correct assumption to make? • Point 6. We feel that the 10 Working Days should consist of a timed obligation on the MOA to provide the Smart Device Details and then the Supplier should have 5 Working Days to complete the process. If a process is to be made up of 2 steps then each element requires a measurable timescale. However, please note our earlier comments regarding distribution of Smart Device Details flow. • Point 7. Should say "change of MOA and / or NHHDC". We do not agree with the use of "other means, as agreed" in this process. This does not necessarily mean that the Contract Reference within the D0155 is the best method for achieving notification of a Smart Meter and we feel that the addition of a Smart flag in the D0155 would be a neater solution. If the Contract Reference is used to indicate Smart Metering then the

Npower	flow notes and / or Annex C of the DTC should describe what Contact Reference to use. This will ensure consistency across all MOAs and Suppliers. In addition, we think that Contract Reference should be updated as part of the Smart deployment process. This will aid the MOA in selecting the correct processes for Smart metering. • Point 10. Can you clarify that the enablement status for the meter will be available to the MOA via the DCC? There may be instances where MOAs will need to visit site and will require information on existing metering status which have not been triggered by the Supplier, e.g. emergency work. It appears that Point 10 contradicts Point 5. In terms of the energisation / de-energisation process we would like clarity as to whether the Supplier is expected to provide updated 'Meter Configuration Details' in response to receiving a D0139 from MOA or potentially LDSO. • Point 12. Should be reworded to state "the Supplier will ensure that the latest version for that day is the one that is distributed to the NHHDC". To "endeavour" means they will do their best which we feel is no appropriate when this will be a compliance obligation. Whilst it is understood that the configuration of the meter may change more than once in a given day current NHH Settlements processes cannot support more than one Settlement effecting change in one day. Therefore there should be a limitation set that only one Settlement effecting change can be processed per day. A defined list of scenarios where multiple SSC changes could occur in a single day but not necessarily impact on Settlements should be produced. • Point 13. We believe this will lead to confusion – the flow description in the DTC suggests the use of the Smart Equipment Work Management Request is limited to work carried out on the 'meter', whereas the point above suggests this flow is used for the installation / maintenance of additional 'Smart Metering Equipment'. We understand the latter to be correct and would like this made clearer in the DTC Flow Description. Words to the effect of "Request is being made and information provided to allow removal, replacement or installation of a meter and or associated Smart Devices. Used for meters other than Smart meters, for which the D**** Smart Equipment Work Management Request flow should be used." • Point 14. We strongly disagree with the stance adopted for only designing for success. It seems short

Npower	sighted to consider making such wide scale changes to the provision of MTDs yet to not prescribe a method of chasing missing flows. This could pose a serious risk to Settlements which needs to be mitigated in line with the existing Performance Assurance Framework. "Designed for success processes" provide no protection to Settlements where exceptions arise. • Point 15. How will this MDD item be managed? As no governance is in place to approve a meter model / version combination as SMETS compliant this item may become subjective based on individual participants view on whether a meter is SMETS compliant. For instance a MOA may be working for two different Suppliers with different views on a meters compliance with SMETS. This could be down to something as simple as Supplier A has completed firmware testing and so is happy to accept a meter when Supplier B has not. We would expect a similar framework to BSCP601 to be implemented to manage this process. • Point 16. Changes will be required to the PARMS serials and it would have been beneficial for these changes to have been made in tandem with this CP. We are concerned that if the inevitable PARMS CP is not raised in a timely manner then there will not be the same level of assurance across Traditional and Smart meters to protect Settlements." **CP1395** "NHHDCs may receive readings from the Supplier which have been received remotely from site prior to them receiving meter technical details. This could result in the NHHDC being unable to validate these readings as they are applicable to a meter they do not have registered on the MPAN. The resolution for this would be for the readings to be sent to the NHHDC by the Supplier along with the corresponding meter technical details. Alternatively, the Supplier could be responsibility for issuing the D0149 / Meter Config Details (as in CP1388)." **How is your organisation impacted by [this change]?** **CP1388** "See npower's original response to CP1388." [npower previously advised "CP1388 represents a significant change to the existing procedures which would require significant systems changes, made more complex by the need to be able to operate existing traditional processes alongside new Smart processes. This is compounded by

Npower	uncertainty surrounding the level of additional change required to reach end to end design, against which business processes and systems can be developed (for example we anticipate significant changes to PARMS reporting as a result of CP1388 which will need to be addressed)."] **CP1395** "As a Supplier, Meter Operator and NHHDC business CP1395 makes changes to the existing processes Suppliers and their agents follow." **What are the associated costs on your organisation to implement [this change]?** **CP1388** "See npower's original response to CP1388." [npower previously advised "It is difficult to provide meaningful estimates at this stage given the level of uncertainty with the current drafting combined with the commercial arrangement with IT Suppliers and in-flight Smart projects. However, initial high-level assessment of this proposal indicates there will be significant change across a number of our systems and processes to allow for both Smart and Traditional processes to run in parallel."] **CP1395** "At present, we are unable to provide costs. Whilst CP1395 suggests minimal flow change, the process changes are likely to result in system changes which would require a detailed impact assessment to be carried out before costs would be known." **Do you agree with the implementation approach?** **CP1388** "See npower's original response to CP1388." [npower previously stated that it needs notice of 365 days from committee decision notification to implement these changes]. **CP1395** "Yes" **Any other comments?** **CP1388** "See npower's original response to CP1388." [npower previously advised "It is difficult to provide meaningful estimates at this stage given the level of uncertainty with the current drafting combined with the

Npower	commercial arrangement with IT Suppliers and in-flight Smart projects. However, initial high-level assessment of this proposal indicates there will be significant change across a number of our systems and processes to allow for both Smart and Traditional processes to run in parallel.] **CP1395** "We still believe there is a middle ground approach, between the solutions proposed in CP1388 and CP1395 which could be explored to take the minimal flow change approach whilst still minimising the process risks."

Summary of Comments on BSCP redlining (CP1388)			
Organisation	**Document name & location**	**Comment**	**ELEXON's recommendation**
EDF Energy	BSCP504, 3.2.3.6	If the DC is de-appointed or there is a CoS and subsequently the meter configuration changes, then we do not believe the passing of historic information would seem sensible e.g. the EAC details.	So long as the responsibility for taking the CoS read remains with the new Supplier's NHHDC and there is a requirement to deem readings as a last resort, the new NHHDC will still need the EAC. If the CoS process is further amended, this may well be the subject of a further Change Proposal.
EDF Energy	BSCP504, 3.2	The New Connection process does not really cover the meter installation; we believe there should be two separate processes.	Steps relevant to the NHHDC are covered. The NHHDC has a minimal role in a meter installation, so the process is covered in BSCP514.
EDF Energy	BSCP504, 3.2.3.8	The Supplier is unable to send the D0152.	3.2.3.8 has not changed as a result of CP1388.
EDF Energy	BSCP504, 3.2.4.3	This is MOP to Supplier so not required for this BSCP.	3.2.4.4 is dependent on 3.2.4.3 so including 3.2.4.3 provides useful context. The timescales for 3.2.4.3 show when the NHHDC can expect to receive their data.
EDF Energy	BSCP504, 3.2.4.4	If the DC or the meter is unchanged why would the NHHDC require the details again?	A good point. But CP1388 mirrors the non-smart process.
EDF Energy	BSCP504, 3.2.7.10/11	This may not be relevant as the meter configuration may have changed.	New NHHDC has to process opening and closing reads under the current rules (i.e. without going down the 'split responsibilities' route). So the new NHHDC will need this data even if the configuration has changed.
EDF Energy	BSCP504, 3.2.7.12	We are not sure if ETs should be added as we believe these are outside of the scope of this	ETs are outside the scope of this change. As we are not proposing to change the process, the existing non-smart process step has been copied

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		change.	across to the smart process.
EDF Energy	BSCP504, 3.3.5	If the meter details in Smart are not sent to the NHHDC how will they know if/when a meter is removed. Is this important to the DC or will they treat this as De-energised and record no consumption?	The Data Collector will not be performing the data retrieval role for smart Meters. They will be validating readings as they receive them from the Supplier, calculating EAC/AAs and sending them to the NHHDA. As such, the NHHDC only needs to know that a Meter has been removed to avoid wasted yearly visits for de-energised sites. At the MTD workgroup meeting on 12 February, it was noted that there is an incentive on the Supplier to notify removal for de-energised sites.
EDF Energy	BSCP504, 3.3.8.2.2	Is the D0002 to NHHDC required for a Smart Meter given that the Meter Config, readings and details are passed in the next two steps? So is the D0002 superfluous. If in 3.3.8.2.3 we send the new config details in all instances then this will mean a single process rather than one based on two sets of flows.	This mirrors the non-smart process. The D0002 is used to provide details of fault rectification which cannot be obtained from the Meter Configuration details. 3.3.8.2.3 is consistent with the distribution of the MTD in other processes.
EDF Energy	BSCP504, 4.4	Need to amend CoS read to new/old DC processes?	4.4 describes "backstop" processes like Supplier Agreed Reads, Point of Sale readings and deemed readings. These processes will gradually fall into disuse and may be dispensed with in future. However, they still apply for non-smart Meters and will apply in exceptional circumstances for smart Meters.
EDF Energy	BSCP504, 4.15	Does the Long Term Vacant process apply for	Not relevant to CP1388, though would benefit from further discussion in the fullness of time. Reading Types to be considered as part of further work by

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		Smart Meters, we are assuming this is not applicable as the supplier can take remote readings and then pass these through to NHHDC at period interval. These will then be true values for settlements. There currently isn't the "remote read" type with a D0010, which may require a change to be raised under the MRA.	the MTD workgroup.
EDF Energy	BSCP514, 2.4	In the redlining of BSCP 514 section 2.4, there seems to be unnecessary replication of information that is already in section 2.3, this should be rationalised so that obligations are not repeated.	This replication already exists, likely introduced when a Service Lines was merged with this BSCP. This can be tidied up through a subsequent change.
EDF Energy	BSCP514, 6.2.1.12	Why is this step required, as the Supplier would have these details already?	Agree that it seems superfluous, but we have mirrored the existing non-smart process.
EDF Energy	BSCP514, 6.2.2	The meter install process should be a separate process. The New Connection should stop at section 6.2.2.6 this is because an installation process is required not just for new connections but for those which are now having a meter fitted after one was removed.	Meter exchanges are covered by a separate process (6.3.4). The connection and meter installation processes could be separated, but this isn't required to facilitate the roll-out of smart metering. It applies equally to non- smart metering.
EDF Energy	BSCP514, 6.2.2.17	How can the D0010 be issued to the Supplier if the MOA have not configured the meter? The Supplier would remotely configure the meter	The requirement for the MOA to send readings to the Supplier is optional (and dependent on the extent to which the SMIP security arrangements

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		and therefore obtain the reading.	allow MOAs to configure Meters locally).
EDF Energy	BSCP514, 6.2.3.5/6	Are these steps required in BSCP514 as no MOA involved	These were added to provide context after the redlined changes were reviewed by the MTD workgroup. Without these steps there would be additional non-smart process steps for the MOA on change of NHHDC, with no equivalent smart process steps.
EDF Energy	BSCP514, 6.2.5.9	We believe this process is too late and would require this by SSD -5wds.	Agree that this should be changed to 'By SSD'.
EDF Energy	BSCP514, 6.3.3.2	If rejecting the D0142 then we would prefer that a D0002 to be sent rather than the P0211. Also applicable to 6.3.4.2/9, 6.3.4.17 (D0zzz)	This is a reasonable suggestion, but is not essential to the core changes being proposed as part of CP1388. It could be raised as a separate, incremental change.
EDF Energy	BSCP514, 6.3.3.12/13	Are these steps required as there is no MOA involvement also related to 6.3.4.21/22 and 6.4.1.16/17	Some Supplier-NHHDC flows have been included in BSCP514 following comments by MTD workgroup members during the earlier review of the redlining that they were useful for context. BSCP515 only includes processes where the LDSO takes an active role. Where the LDSO takes a passive role (i.e. just receives flows), the process is not defined in BSCP515.
EDF Energy	BSCP514, 6.4.1.13	We are not sure that reads are required as we assume that the MOA will not contact the Supplier to read, so will the reads and configuration details be required by MOA.	Both the configuration details and the readings are optional (by arrangement with the Supplier).

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EDF Energy	SVA Catalogue Volume 1, Smart Meter Configuration Details	Instances of this flow from the NHHMO to the Supplier should be removed as the NHHMO is not able to configure a smart meter in any way, even locally; this is always carried out by a command from the Supplier.	Agree - At the time, it was expected that the MOA would be able to configure the Meter locally. We understand that now the intention is for any local configuration to be enacted by the MOA using a secure configuration instruction provided by the Supplier. As such, the NHHMOA will not send this flow. We will recommend amendment accordingly.
EDF Energy	SVA Data Catalogue Volume 2, Device Location	We do not believe a separate data item is required for device location, it should be sufficient to rename the existing data item Meter Location to Location, and use this for all devices, rather than having two data items for the same purpose.	Agreed at the MTD workgroup meeting on 12 February to use Device Location for both smart Meters and other smart equipment. Device Location will have the same valid set as Meter Location. However, the redlining didn't capture that the change was from "Meter Location" to "Device Location", which will be addressed.

Summary of Comments on BSCP redlining (CP1395)

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IMServ Europe Ltd	SVA Data Catalogue Volume 1	Why does the new flow "Smart Meter Configuration Details" from NHHMO to Supplier need reference to BSCP504? This new flow would not touch the NHHDC who would continue to receive D0149/D0150 from NHHMO… and D0052 from Supplier.	Agree – will recommend the removal of reference to BSCP504
EDF Energy	BSCP504, Page 20 Footnote 10 (also 3.2.3.1, 3.2.6.1)	We believe that the D0155 should be amended to include a specific flag to denote that the NHHDC is being appointed to a smart meter.	This is not essential to the 'core' changes described in CP1395 and could divide opinion further. So we recommend that this could be proposed as an incremental change, subject to sufficient support.
EDF Energy	BSCP504, 3.3.10	The process for change of Profile Class is the same for all meters, so it is not clear why this has been split into smart and non-smart processes.	The smart Profile Class processes don't need to have the same steps as non-smart; and with smart the Supplier provides the Meter reading to the Data Collector.
EDF Energy	BSCP504, 4.12.1.2	As previously noted the MOA will not be able to configure a smart meter based on the DECC security model.	Agreed – we will speak with the proposer and bring to approving committee's decision.
EDF Energy	BSCP514, General	We note that there are a number of proposed wording changes which are not specifically related to this change, will these be progressed separately if the CP is not progressed?	Any Housekeeping changes are kept on a register and would be presented to committee for approval as part of any CP against BSCP514. If approved, these will then be implemented as part of that CP.

EDF Energy	BSCP514, 6.2.4.1	We believe that the D0155 should be amended to include a specific flag to denote that the NHHMO is being appointed to a smart meter.	This is not essential to the 'core' changes described in CP1395 and could divide opinion further. So we recommend that this could be proposed as an incremental change, subject to sufficient support.