

CP1388 and CP1395

About this document:

This is an Assessment Consultation document, which provides details of the background, solution, potential impacts and costs associated with CP1388 'Meter Technical Details for Smart Meters' and CP1395 'Distribution of Configuration Details for Smart Meters'. This document is for information only, to be used in line with the Consultation Response form, to which this document is attached.

1. Why Change?

Background

Current Arrangements

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

New operating model for smart Meters

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

The Department of Energy and Climate Change's (DECC) Legacy System Changes (Enduring) paper v2.0 dated 14 November 2011, an output from its Smart Metering Implementation Programme (SMIP), set out the operating model for MTDs for smart Meters.

The paper set out the scope for potential changes to legacy systems to support smart Metering and established principles and high level requirements for registration, MTDs, installation requests, Meter readings and communications with Data and Communications Company (DCC). These changes would be progressed under the Smart Metering Regulation Group (SMRG), Working Group 4 (WG4).

The SMRG WG4 acts as a steering group for development of consequential legacy system changes and is chaired by DECC. The WG4 includes representatives from Parties, Party Agents, Code Administrators and Ofgem. The purpose of the WG4 is to identify the requirements to be assessed and progressed under existing industry change processes with the intention of avoiding the use of Secretary of State powers where at all possible.



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

It is anticipated that where remote configuration is not possible, for example due to a local failure of the Wide Area Network (WAN), the MOA may be instructed by the Supplier to update a configuration locally (e.g. using a handheld terminal) subject to the DCC/Smart Energy Code (SEC) security architecture.

DECC considered five options when setting out the new operating model:

- Option 1 – Supplier logical owner, but discharges responsibility for configuration via the NHHMOA;
- Option 2 – NHHMOA sends a D0150 as a single rate, Supplier updates with actual configuration and sends revised D0150 and D0149 to NHHDC and LDSO;
- Option 3 – NHHMOA sent copies of DCC request/responses by Supplier and populates D0150/D0149 as at present;
- Option 4 – as option 2 but with changes to existing D0150/D0149 (e.g. Using optional fields, rather than defaulting to single rate); and
- Option 5 – as option 2 but using new flows.

It preferred "option 2", which introduced the new principle of Suppliers establishing and sending MTDs. This option was also intended to allow the utilisation of existing flows, rather than necessitating the creation of new flows, in a bid to minimise change.

BSC-MRA Working Group

DECC passed the development of the solution to the industry to develop the new operating model. ELEXON established the Balancing & Settlement Code (BSC) – Master Registration Agreement (MRA) Working Group to consider details and provide a response to SMRG WG4.

When passing the work on to the Group, DECC made it clear that it was happy for industry to develop a workable solution as long as it met the overall objectives for the SMIP. This provided the Group with more flexibility than other work streams, such as the registration-related work, which was more tightly defined due to its direct link with the DCC procurement activity.

The Group's membership was put forward by interested parties following an invitation to the BSC and MRA change co-ordinator mailing lists. The Group was formed from across the industry (large and medium



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Suppliers, LDSOs and independent Supplier Agents), as well as ELEXON and Gemserv (and for one meeting Ofgem).

This group met seven times between 27 February 2012 and 12 February 2013 and issued a consultation on a high-level solution on 1 October 2012.

At its earlier meetings, the Group noted benefits in re-using D0149/D0150 but didn't want to rule out using new flows as they may be less risky; and also wanted to investigate a potential minimal change option where the MOA distributes, but not necessarily generates, complete MTDs. It also agreed that any solution should be driven by industry preferences. The Group then looked at these two fundamental issues in more detail.

The Group applied alternative MOA distribution approach to business scenarios to identify benefits and issues. Although it felt it was desirable to have minimum participant process and system impacts, the Group's analysis revealed that an MOA led distribution of MTDs would be more complex, with more dependencies and potential points of failure. **It therefore concluded that its preference was for distribution of MTDs by Suppliers.**

Question 1 (for CP1388 and CP1395)

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?

With respect to the MTD format, the Group considered whether current flows should be re-used or whether modified/new flows would be more appropriate. **The Group's preference was for new flows** so as to minimise enduring process risk over immediate implementation risk, concluding that new dataflows were "cleaner" and more easily identifiable as part of an exceptions process.

On the 1 October 2012, ELEXON issued a consultation on the high level solution and optional solution elements. The responses from the industry consultation included those from Suppliers (large, medium and small), LDSOs, MOAs and Data Collectors. Twelve out of 19 respondents supported the overall high level proposal, but there was a diversity of views about some of the features of the solution. The complete set of responses can be found [here](#).

Subsequent meetings finalised the detail of the Group's preferred option, which became CP1388.

CP1388 'Meter Technical Details for Smart Meters'

ELEXON raised CP1388 to implement the Group's agreed way forward, which is aligned with "option 5" from DECC's Legacy System Changes (Enduring) paper. It also raised MRA DTC CP3380, to capture the new dataflows in the Data Transfer Catalogue.



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It issued CP1388 for consultation on the 28 December 2012 under CPC00722, with responses due back on 24 January 2013. In general, respondents provided consistent views reflecting positions throughout the development of CP1388. The only new view was on widening the scope of the change to include smart Meters not compliant with the SMETS. However, this is outside of the scope of the CP and the associated Approved Modification Proposal [P292 'Amending Supplier & Meter Operator Agent responsibilities for smart Meter Technical Details'](#).

The Group met again on the 12 February 2013 to consider the consultation responses. They reviewed the comments on the redlined text and agreed that none of the suggested amendments were material, and that they merely added clarification. The Group also noted that whilst a number of opinions had been shared, no new arguments had been raised. It agreed, **subject to some clarification changes, the solution in CP1388 was fit for purpose.**

P292 'Amending Supplier & Meter Operator Agent responsibilities for smart Meter Technical Details'

As the new operational model of the Supplier configuring the Meter would impact on the responsibilities for who establishes the MTDs, it became clear that a Modification to the BSC was required before any detailed solution could be progressed.

E.ON raised P292 on 4 March 2013 to enable changes to Supplier and NHHMOA responsibilities for MTDs for smart Meters. **Without such a Modification, detailed solutions could not be approved without causing conflict with the BSC.**

The Panel made its final recommendation that P292 should be approved at its meeting on 9 May 2013, with Ofgem subsequently approving P292 on 19 June 2013.

The provisions of P292 will come into effect on the 26 June 2014 as part of the June 2014 Release.

Progression of CP1388

At the time that ELEXON presented CP1388 to the SVG for decision, P292 had not been approved, DECC had not decided to delay the mass rollout of smart Meters and no alternative solutions to CP1388 had been raised. Without the approval of P292, the Supplier Volume Allocation Group (SVG) could only make a recommendation to the Panel on CP1388 on whether or not to approve the change.

ELEXON presented CP1388 to the SVG at its meeting on the [5 March 2013](#). The SVG could not make a unanimous endorsement of CP1388, but all agreed that 'no change' is not an option. It therefore **recommended by majority that the Panel reject CP1388**, but supported June 2014 Release, if approved.



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CP1388 Education Session

The Panel were aware that there were divergent views on a detailed solution, and therefore asked ELEXON to hold a session to explain CP1388 to the industry and see if any new opinions or solutions would be raised. ELEXON held the session on the 20 June 2013.

No new opinions were raised but British Gas made it known that it was mindful of raising an alternative to CP1388.

CP1395

British Gas raised CP1395 'Distribution of Configuration Details for Smart Meters' on 19 July 2013 to address this issue, which is similar to "option 3" from DECC's Legacy System Changes (Enduring) paper. Prior to raising CP1395, British Gas consulted with a small number of participants that had expressed an interest in its proposal.

2. Solution

This section sets out the two solutions for managing MTDs for smart Meters as identified in CP1388 and CP1395 respectively. Although there may be other options, Parties have not raised these through a CP. As such, assessment should be carried out on the merits of CP1388 and CP1395 against the baseline and each other. Attachment E provides a breakdown of each change and an assessment of the two solutions and likely impact, specifically risk to Settlement, of each solution.

Question 2 (for CP1388 & CP1395)

Do you agree with the analysis of both CPs presented in Attachment E?

CP1388

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

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

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



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

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

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

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

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

Question 3 (for CP1388)

Do you agree with the proposed change CP1388?

Question 4 (for CP1388)

What risks to Settlement do you believe may be a result of implementing CP1388?

CP1395

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

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

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

Supplier requests for the MOA to install other smart metering equipment (such as a communication hub or In-Home Display) and confirmation by the MOA will be subject to bi-lateral agreement between the Supplier



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and the MOA. This does not preclude a separate standard industry flow(s) being developed under the MRA, if required.

Question 5 (for CP1395)

Do you agree with the proposed change CP1395?

Question 6 (for CP1395)

Do you agree with the timescales for transfer of data as set out in CP1395?

Question 7 (for CP1395)

What risks to Settlement do you believe may be a result of implementing CP1395?

Assumptions for CP1388 and CP1395

For both CP1388 and CP1395 it is assumed that:

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

Subsequent CPs likely required if CP1388 or CP1395 were approved

Change of Measurement Class

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

PARMS Serials

The Performance Assurance Board (PAB) may want changes to the relevant Performance Assurance Reporting and Monitoring System (PARMS) Serials.

For CP1388, this would be to reflect the transfer of some of the MOA's responsibilities to the Supplier.



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For CP1395, the PAB may want to measure timeliness of communicating the new Smart Meter Configuration Details from the Supplier to the MOA, in which case this would require a new PARMS Serial.

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

Justification

Provided here is a summary of why the proposers believe their solution is better than the baseline and the other CP, along with ELEXON's overall view on the benefits and drawbacks of the two solutions.

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

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

CP1388

The proposed solution reflects the Group's and consultation respondents preferred solution for each element.

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

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

It introduces the more risk in terms of implementation and costs. However, it is less risky in terms of timeliness and distribution of MTDs and Meter readings to the NHHDC, therefore has less risk to Settlement.

Using new dataflows is "cleaner" as it enables the easy identification of the Meter type and those responsible for dataflows. This will therefore help in exception reporting.

CP1395

Retaining the use of the D0149/D0150 aligns closer to the agreed minimal change principal than CP1388 and introduces less risk and costs in terms of implementation.

The extended use of the D0149/D0150 removes any possible ambiguity during the change of Supply processes around what set of flows a Supplier should be expecting to receive. That is, with respect to Supplier systems waiting for the receipt of the D0149/D0150 or new Smart Device Details and Smart Meter



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Configuration Details. In terms of missing MTD on change of Supplier, the new Supplier needs to understand which party it is expecting the MTD from. If not addressed, these could potentially add risk to the customer experience through change of Supply events, but more importantly to Settlement. It's difficult to track and escalate missing data if there is uncertainty around the nature of the data and its source.

Under proposals for the centralisation of services under the DCC in the Ofgem Smarter Markets Smart change of Supplier Workstream, it has been suggested that the DCC could become a central point for the storage and communication of MTD. If a central MTD register were to be implemented then any changes implemented here would very much be a short term solution. Cost savings are delivered by minimising the cost of implementation and amount of change and disruption to current business processes. Therefore, CP1395 would not be wasted effort if other solutions are developed through the smarter markets work.

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

3. Impacts and Costs

Potential Central Impacts and Costs

CP1388

ELEXON Estimated Costs and Potential Impacts		
Document Changes	System Changes/Impacts	Total
BSCP504	No system changes or impacts identified.	1 man day equating to £240 ¹
BSCP514		
BSCP515		
SVA Data Catalogue Volume 1		
SVA Data Catalogue Volume 2		

ELEXON has issued v0.2 of the redlined changes for Participant Impact Assessment (IA), which addresses the comments from the previous IA consultation. Further amendments are likely to be required with respects to the November 2013 Release.

¹ Includes all activities associated with implementing this proposal.

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CP1395

ELEXON Estimated Costs and Potential Impacts		
Document Changes	System Changes/Impacts	Total
BSCP504	No system changes or impacts identified.	1 man day equating to £240 ²
BSCP514		
BSCP515		
SVA Data Catalogue Volume 1		
SVA Data Catalogue Volume 2		

ELEXON has issued the redlined changes for Participant Impact Assessment (IA), using BSCP514 v26, which will come into effect in November 2013.

Potential Party Impacts and Costs

CP1388

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

² Includes all activities associated with implementing this proposal.



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Question 8 (for CP1388)

Is your organisation impacted by CP1388? If yes, please answer the following:

Question 8a

How is your organisation impacted by CP1388?

Question 8b

What are the associated costs on your organisation to implement CP1388?

CP1395

Party Impacts

Party type	Potential Impact
Supplier	Minimum processes, systems and training to handle new Smart Meter Configuration Details flow or setting up of bi-lateral arrangements for communicating configuration details. Less impact where the NHHMOA role is "in-house", as will be able to use "underpin" processes.
NHHMOA	
NHHDC	Some training likely to be required.
LDSO	

Question 9 (for CP1395)

Is your organisation impacted by CP1395? If yes, please answer the following:

Question 9a

How is your organisation impacted by CP1395?

Question 9b

What are the associated costs on your organisation to implement CP1395?

4. Implementation Approach

CP1388 and CP1395 are targeted for implementation on 26 February 2015 as part of the February BSC Systems Release.

Question 10 (for CP1388 & CP1395)

Do you agree with the implementation approach? If not, why?



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Question 11 (for CP1388 & CP1395)

Do you have any other comments?

Attachments:

Attachment A – CP1388 Form

Attachment B – CP1388 Proposed Redlined Text v0.2

Attachment C – CP1395 Form

Attachment D – CP1395 Proposed Redlined Text

Attachment E – CP1388 & CP1395 Detail and Analysis

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