

## Change Proposal Circular – CPC00736 Responses

CPC00736: Impact Assessment of CP1405

### Summary of Responses for CP1405

ORGANISATION	Agree with the change?	Impacted?	Cost?	Implementation Date?
Electricity North West	Neutral	No	-	Neutral
TMA Data Management Ltd	Yes	Yes	Medium Cost	No
GDF SUEZ Energy UK	Yes	Yes	None	Yes
EDF Energy	Yes	Yes	Unable to provide	Yes
Siemens Metering, Communications & Services	Yes	Yes	Yes	No
ScottishPower	No	Yes	Unknown	No
RWE Npower	Yes	Yes	Unable to provide	Yes
SSE Energy Supply Ltd	Yes	Yes	Low Cost	Yes
IMServ Europe Ltd	Neutral	Yes	Minimal	Yes
Centrica	Yes	Yes	Minimal	Yes

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Organisation	Responses/Comments
Electricity North West	<p><b>Do you agree with the change?</b> Neutral</p> <p><b>How is your organisation impacted?</b> -</p> <p><b>What are the associated costs on your organisation to implement the change?</b> -</p> <p><b>Agree with the implementation approach?</b> Neutral</p> <p><b>Any other comments?</b> No</p>
TMA Data Management Ltd	<p><b>Do you agree with the change?</b> Yes. Faster switching in NHH should be achieved, however, the barriers to deliver faster switching are linked to the complexity of the process rather than simple deadtime. Smart Metering is the perfect opportunity to simplify the process and remove the reliance on historical data; for non Smart Metering customers the reduction of the timescales will be more challenging but should still be aimed for. We see this change as a necessary step towards an improved switching process.</p> <p><b>How is your organisation impacted?</b> Our systems and procedures are impacted</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Medium cost</p> <p><b>Agree with the implementation approach?</b> No because the implementation in June does not provide enough notice for necessary changes to take place. We would like to have at least 100 WD.</p> <p><b>Any other comments?</b> To ensure that party agents can send the D0170 to the required parties, the D0148 must contain all the relevant information: new agent details as well as old NHHDC details in the case of the NHHDC. It is not clearly specified in the redline text.</p>
GDF SUEZ Energy UK	<p><b>Do you agree with the change?</b> Yes.</p>

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	<p>We agree the change should allow suppliers to action Change of Supplies in shorter timescales with more confidence that the relevant information will be received in order to bill the customer promptly.</p> <p>However, we do not believe that this will solve the underlying issues for any long term delayed transfer of information.</p> <p>In our experience most agents send information as soon as they receive it, we don't believe that changing timescales will in practice dramatically speed the transfer of data or in cases where transfer is delayed resolve any issue.</p> <p><b>How is your organisation impacted?</b> Reduced timescales for receipt of data flows.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> No cost.</p> <p><b>Agree with the implementation approach?</b> Yes</p> <p><b>Any other comments?</b> As the HH timescales have historically been shorter than the NHH ones, if this change is accepted should the HH process be changed in line with the NHH one?</p>
EDF Energy	<p><b>Do you agree with the change?</b> Yes, because it improves customer perception on switching. It also takes advantage of automation of processes to provide a sensible time frame for such transfers. It should also provide focus to deal with any exceptions to automated responses in a timelier manner minimising impact on customer and keeping quality of data for settlements at a high level.</p> <p><b>How is your organisation impacted?</b> Changes to systems and processes will be required.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Costs for these changes are being made as part of other amendments. We cannot provide costs that are relevant just to this CP.</p> <p><b>Agree with the implementation approach?</b> Yes because it provides an opportunity for process to be speeded up at soonest opportunity.</p>

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	<p><b>Any other comments?</b> If a NHHDC receives a reading they need to validate it and generate an associated EAC before they can send read history in D0152 and D0010 flows. Currently daily profile coefficients may be amended and reissued up to 7 working days after settlement date. Common practice within NHHDC is to wait 8 working days from date of a reading before generating _PERQ file to calculate AA and EAC. If a D0170 is received just after a reading has been received it's very likely that NHHDC will not be able to meet suggested timescales. One option would be for timescales allowed for finalising daily profile coefficients to be drastically shortened (e.g. to 2 working days) so that EAC/AA data can be calculated more swiftly. If that is not possible then an amended solution for step 3.2.6.7 has been provided against redlined text for BSCP 504 below.</p>
Siemens Metering, Communications & Services	<p><b>Do you agree with the change?</b> Yes. We can see that it will benefit the end-customer. We believe that the Change will not negatively impact Settlement, in fact it may be beneficial as exceptions will be cleared quicker.</p> <p><b>How is your organisation impacted?</b> There will have to be a computer system amendment so that D0170 received by the old DC role is processed immediately to send the D0010 (historic reading) and D0152 (settlement data) instead of holding it to the Date_Action_Required_By (J0028).</p> <p>We believe the CP could make it clearer that the use of the Date_Action_Required_By (J0028) is deprecated in this situation. New/modified exception reporting will have to be developed to meet the new SLAs.</p> <p>There will be additional costs in having to running computer batch processes more frequently to ensure data flows are processed in SLA.</p> <p>Additional operational FTE may be required to manually resolve exceptions to the tighter timescales.</p> <p>We have concerns about the timing of the steps in the process for the new DC to receive MTD and Read History as outlined in Appendix 2. Does the proposal allow for the Read History to be received by the DC before the MTD? Our processes/systems are designed to automatically handle MTD before Read History; if the Read History was received before or at the same time as the</p>

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	<p>MTD then both would require manual intervention to insure that they were processed by the DC.-</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Confidential response</p> <p><b>Agree with the implementation approach?</b> No. A June 2014 implementation would be demanding for us to achieve given the business and operational developments that we are already committed to will require staff resources up to, and beyond the June release date. We would like to propose the November 2014 Change Release Date as being more achievable for implementation of this CP.</p> <p><b>Any other comments?</b> We would like clarification around the definition of Working Day as used in the Proposal. We understand that the end of the Working Day is 17:00, and therefore any data flow arriving on Monday before 17:00 has until 17:00 on Tuesday to be responded to meet a 1WD SLA, but if the data flow is received after 17:00 on Monday it has to 17:00 on the Wednesday for a response to meet the 1WD SLA.</p> <p>If the above scenario is correct, has it been understood by all the parties? Or are some of them basing their assumptions on a Working Day modelled on the calendar, with a midnight cut-cover?</p>
ScottishPower	<p><b>Do you agree with the change?</b> No, while we agree with the principles outlined in the CP, we believe there are a number of key processes that have to be included within this change, including PARMS and all agent appointments ( HH, NHH, UMS, and new connections as it should be the same process irrespective of the trading market.</p> <p><b>How is your organisation impacted?</b> We currently act as both Supplier and Agent and as such we will be sending and receiving all data flows detailed in this CP. We will also have to implement various system changes related to deadline monitoring and business exception management processes.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Unknown at this time, but impact could</p>

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	<p>be lessened if combined with the MRA changes planned for November 2014.</p> <p><b>Agree with the implementation approach?</b> No, we believe June 2014 is unrealistic and we believe the change should be aligned with the MRA and UNC changes which go live in November 2014.</p> <p><b>Any other comments?</b> While ScottishPower agree with the principles behind quicker switching we believe that the timescales proposed are unrealistic in that they do not give time to develop, deliver and test the robustness of systems which could result in a poorer customer experience and also impact on the accuracy of the current trading arrangements.</p>
RWE Npower	<p><b>Do you agree with the change?</b> Yes</p> <p><b>How is your organisation impacted?</b> As a BSC agent we will be impacted by the changes to appointment process timescales to facilitate faster switching. However, we currently only utilise the existing timescales when exceptions prevent the automated process from completing.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> We are unable to provide a detailed cost assessment at this time, however we envisage this CP would require small system changes and changes to our internal processes.</p> <p><b>Agree with the implementation approach?</b> Yes</p> <p><b>Any other comments?</b> We believe the proposed timeline should mandate that the outgoing MOA responds to a D0170 whether it has received a D0151 or not in order to meet this timeline. In consideration of this, MOAs must then ensure that if there has been a meter change for example after sending the initial D0150 &amp; D0149 they must also send a refresh to the new MOA. This would prevent delays where the outgoing MOA delays sending the MTDs to the new MOA until they have received the D0151.</p> <p>We are aware that some MOAs are reluctant to release Level 3 passwords for AMR meters until they have been de-appointed. However, Npower disagrees with the proposal to split the MTDs (D0149, D0150 &amp; D0313) as this would be complicated and</p>

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	<p>expensive to implement and would not be achievable by June 2014. Our proposed solution would see the outgoing MOA issue a full set of MTDs (D0149, D0150 &amp; D0313) containing only Level 1 and Level 2 passwords and then follow this up with a further complete set of MTDs including the Level 3 password once they have received the D0151.</p> <p>The CP highlights the need to benefit domestic customers but otherwise does not stipulate that the CP only applies to domestic customers. The reference to AMR suggests it's more than domestic customers but is not clear. Please can this be clarified as if we reduce the timescales then this will be for all customer types as MOAs don't hold data relating to customer Profile Class.</p> <p>Finally, we would point out that the majority of agent appointments will be processed and responded to within 24 hours and the additional time currently permitted would only be utilised for exception management. The one concern we do have around shortened timescales would be the speed at which exceptions would need to be cleared and whether consequential industry processes allow for these exceptions to be cleared within the new proposed timeline.</p>
SSE Energy Supply Ltd	<p><b>Do you agree with the change?</b> Yes. SSE Supply recognise the challenge of Faster Switching and on this basis we are committed to its successful and efficient delivery. We view CP1405 as an expedient solution to reduce the agent appointment timescales. Furthermore, this is a wholly necessary element of the wider suite of industry change required to realise Faster Switching.</p> <p><b>How is your organisation impacted?</b> Minimally.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Low cost.</p> <p><b>Agree with the implementation approach?</b> Yes</p> <p><b>Any other comments?</b> No</p>

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<p>IMServ Europe Ltd</p>	<p><b>Do you agree with the change?</b> Neutral as we do not believe the changes will necessarily achieve the desired objective. Most of the flow exchanges happen within these timescales already, and the ones that don't fail for valid reasons. Giving people less time to resolve the exceptions won't necessarily make them send them any quicker.</p> <p><b>How is your organisation impacted?</b> As an agent we will need to respond within these new timescales</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Minimal – some training and internal procedure changes</p> <p><b>Agree with the implementation approach?</b> Yes</p> <p><b>Any other comments?</b> <u>NHHDC</u> – the sending of D0152/D0010 flows (the MRH) within 2 WD of being de-appointed. Many Suppliers get a Customer read close to the date of the CoS to try to improve the accuracy of the CoS read. In order to be able to calculate EAC/AAs based on this this read, NHHDCs need to wait for the DPCs to arrive for the dates in question. As this can be up to 8 working days from the date in question, NHHDCs are often waiting for the last read to process before they can send out the MRH – the new 2 WD timescale will not allow this to happen any quicker than it does currently.</p> <p><u>NHHMOP</u> - sending MTDs out within 2 working days of receipt of the D0170</p> <p>The current version of BSCP 514 Appendix 9.3 states “the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the D0313 Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.”</p> <p>The proposal does not suggest a change to this section however does include the following in section 6.2.4.9 is "D0149/D0150 sent by MOP and D0010/D0152 sent by DC. For AMR meters D0313 could be delayed by current MOP until SSD-1 to maintain security.”</p> <p>These sections would therefore not be aligned – this difference should be addressed.</p>



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Centrica	<p><b>Do you agree with the change?</b> Yes</p> <p><b>How is your organisation impacted?</b> Changes to contractual arrangements with agents will be required</p> <p><b>What are the associated costs on your organisation to implement the change?</b> Minimal</p> <p><b>Agree with the implementation approach?</b> Yes</p> <p><b>Any other comments?</b> Under CP1405, the proposed redlining text for BSCP505 (attached) mentions what SMRS should do if it is notified of a change of Supply – 3.2.1.4 - however it does not mention what SMRS should do if it is notified of a cancellation through the new flow (s) that are being created as part of CP3402 / 3403.</p> <p>I appreciate that CP3402 and 3403 are different changes but would you not agree that all the industry changes being discussed for Faster Switching need to be collectively reviewed?</p>

## Summary of Comments on BSCP redlining

Organisation	Document name & location	Comment
TMA Data Management Ltd	BSCP504 3.2.6.4	"Send notification of NHHDC ,NHHDA and current NHHMOA" should read "Send notification of NHHDC ,NHHDA, current NHHMOA and old NHHDC" If the NHHDC is not informed of the previous agent's details, it cannot send the D0170 within the required timescales.
EDF Energy	BSCP504 3.2.6.7	The revised step 3.2.6.7 requires Old NHHDC to send historic data to New NHHDC within 2 WDs of receipt of a D0170. However footnote 4 on same page mandates that there must be an EAC for the most recent valid reading sent by Old NHHDC. Under current proposed rules Old NHHDC would need to send history even if an EAC had not been calculated. This could mean NHHDC would need to account for this which would increase costs of change.  A solution would be for step to have timings as:  If applicable within 2 WDs of 3.2.6.6 provided an EAC has been calculated for latest valid reading or within 1 WD of EAC being calculated for latest valid reading if an EAC has yet to be calculated.
Siemens Metering, Communications & Services	BSCP504 3.2.6.7 footnote	Note 3 - referring to the "Supply Start Date can be derived from the 'Date Action Required By' (J0028) data item on the D0170 flow. " - should be deleted. Under the CP it is not applicable to section 3.2.6.7
ScottishPower	BSCP504 3.2.6.1	3.2.6.1 suggests that the supplier can appoint agents at any point (as required), not necessarily during the CoS process. Should it instead say following receipt of a D0217 and D0260, or something similar
ScottishPower	BSCP504 3.2.6	Is 3.2.6 CoS with CoDC? It features new NHHDC appointment flow. If so, why isn't NHHDC de-appointment by Old Supplier in this process and accounted for time wise?
ScottishPower	BSCP504 3.2.6.19	3.2.6.19 – shouldn't it be within 2WD as per the CP form?
ScottishPower	BSCP504	Generally – where the timescales are SSD+8 etc should they now be reviewed to tie in with the CP? For example 3.2.6.18, 3.2.6.20?

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ScottishPower	BSCP504 3.2.6.21	3.2.6.21 is reference to 3.2.6.20 correct? How would a supplier know the NHHDC has sent the D0170?
ScottishPower	BSCP504 3.2.6.24	3.2.6.24 – shouldn't this have a validation period? For example within 5WD of receipt of D0071?
ScottishPower	BSCP505 3.2.1.1	As per comments on BSCP504 – should this be as required or should it spell out it is part of a CoS
ScottishPower	BSCP505 3.2.1.4	Needs timescales, e.g. within 2WD or receipt of D0205 or by SSD or effective date of change of agent
ScottishPower	BSCP514	There is no change to the MOA de-appointment time, which remains at 5WDs. This may run a greater risk of appointment overlap, whereby the shortened appointment time causes two MOAs to be concurrently appointed to the same metering point.
ScottishPower	BSCP514 6.2.4.1	As 504 and 505 – is as required specific enough?
ScottishPower	BSCP514 6.2.4.4, 6.2.5.3	If the new MOP can send the D0170 well in advance of the CoS, surely the D0151 should be sent within 2WD of the notification from SMRS (D0058) as long as the effective to date ties in with the supplier loss date?
ScottishPower	BSCP514 6.2.4.5, 6.2.5.5	If all other timescales are coming in the notification to the MAP should come in as well
ScottishPower	BSCP514 6.2.4.6, 6.2.5.6	Should be 5WD to tie in with rejecting appointment
ScottishPower	BSCP514 6.2.4.8	Reference should be to 6.2.4.7 not 6 as need the D0148 detailing old MOP
IMServ Europe Ltd	BSCP514 6.2.4.9	There are several "Error! Bookmark not defined." errors here
IMServ Europe Ltd	BSCP514 6.2.5.8	There is a "Error! Bookmark not defined." error here