CP1409 FINAL CP REPORT

About this document

This report provides details of the background, solution, impacts, industry views and the SVG's final views for CP1409 'Change of Measurement Class process for advanced Meters', which has been approved for implementation on 25 June 2015 as part of the June 2015 BSC Systems Release.

1. Why change

Background

Electricity supply standard licence condition 12 requires that, from 6 April 2014, Suppliers must not supply electricity at any Metering Point in Profile Classes (PCs) 5 to 8 other than through an advanced Meter[1].

Consequently, from that date the Change of Measurement Class (CoMC) process from Non Half Hourly (NHH) to Half Hourly (HH) is likely to involve a NHH Meter which is already HH capable, assuming that the majority of Metering Systems changing from NHH to HH will be in PCs 5-8. In most cases a change of Meter will not be needed, and in many cases a site visit by the Meter Operator Agent (MOA) will not be required. Whilst the current BSC Procedure (BSCP) processes make some allowances for a CoMC with no change of Meter, they do not fully embrace the possibility that a CoMC can take place without the need for a site visit by the MOA.

What is the issue?

The Profiling and Settlement Review Group (PSRG) asked ELEXON to review the CoMC process to ensure that the complexity (real or perceived) of the CoMC process does not act as a barrier to elective HH Settlement. Issue 49 'Change of Measurement Class (CoMC) process for advanced Meters' was raised on 24 June 2013 to look into this issue.

2. Solution

Proposed solution

The Issue 49 Group agreed that, prior to the potential implementation of P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8', several areas needed to be looked into further. The Group reviewed and came up with solutions for these areas and ELEXON raised Change Proposal (CP) 1409 'Change of Measurement Class process for advanced Meters' on 13 March 2014 to address these aspects.

This CP proposes the following changes in response to the issues identified by the Group:

a) Clarify the appointment process options to improve interoperability. It was recognised that there are two options currently adopted by Suppliers for aligning appointments with the effective date of the CoMC:

   i) Master Registration Agreement (MRA) Working Practice 66 where Suppliers appoint the HHMOA (formally via the Data Transfer Catalogue (DTC) or informally) so that the HHMOA can determine whether a site visit is needed and arrange the visit. The remaining agents are then appointed/de-appointed once the CoMC date is firm or has taken place; or

   ii) Suppliers appoint and de-appoint agents and then send revised appointments/de-appointments if the date changes.

[1] A Meter which, either on its own or with an ancillary device, stores measured electricity consumption data for multiple time periods; and provides remote access to such data by the licensee.

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b) Introduce a requirement on the HHMOA to include the time of the initial register reading sent to the HH Data Collector (DC) as well as the date. This will allow the HHDC to estimate zero for Settlement Periods prior to the Meter replacement or re-configuration.

c) Include an explicit reference to the transfer of commissioning details. It was agreed that, in the transfer of information from the NHHMOA to the HHMOA, more emphasis should be given to the obligation on the MOA for the commissioning details (evidence of the date and that commissioning is complete) to be included alongside the Meter Technical Details (MTDs).

d) Clarify that a notification of removal of the NHH Meter should be sent whether the Meter is physically removed or not. This was originally raised as an issue by the BSC Auditor as it was arguable as to whether the notification of removal was required. However, the Issue 49 Group agreed that the process of the NHHMOA sending the D0150 'Non Half Hourly Meter Technical Details' flow to the HHMOA should be clarified such that the flow should be sent to notify that the Meter has been removed or is no longer NHH.

e) Remove the requirement to disable HH functionality on HH to NHH CoMC. The requirement is inappropriate as even if a Metering System changes from HH to NHH, the Supplier may still wish to provide HH data to the customer for energy management purposes.

f) Remove the requirement in BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' 3.4.1.8 for NHHDCs to send the P0028 '100kW Demand Report' to the Panel. It was noted that NHHDCs do not send these reports to the Panel. The report has thousands of sites on it which is meaningless for the Panel to view in that form and so this requirement serves no useful purpose.

3. Impacts and costs

Central impacts and costs

This CP will require updates to the following documents to implement the proposed solution, and you can find the approved changes in Attachments A, B and C. No central system changes will be required for this CP.

Central impacts	
Document impacts	**System impacts**
BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	*None*
BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	
BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'	

BSC Party & Party Agent impacts and costs

CP1409 will impact Suppliers, NHHMOAs, HHMOAs, NHHDCs and HHDCs. 11 of the 12 respondents to the CP Impact Assessment indicated an impact to the extent that there would be system and process changes required.

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Five of the 12 respondents indicated that there would be associated costs with CP1409. Only one respondent provided an estimated figure of at least 40 man days of effort. Six respondents also indicated that there would be costs involved to implement the changes but noted that these are currently unknown.

Attachment D contains the full responses made by participants on the expected impacts and costs for CP1409.

4. Implementation approach

Proposed Implementation Date

CP1409 was originally targeted for implementation on 6 November 2014 as part of the November 2014 BSC Systems Release, as this is the next available Release.

Only five of the 12 respondents to the CP Impact Assessment agreed with this proposed Implementation Date, whilst six respondents disagreed and one was neutral.

Respondents commented that, whilst it would be relatively straightforward to amend the relevant BSCPs within the proposed timescale, the proposed Implementation Date is not practical given the significant participant system changes that will be required. The majority of respondents indicated that they would prefer between 9-12 months from approval to implementation to allow for these changes.

Respondents also noted that P272 has been pushed back to an earliest Implementation Date of April 2016. Taking this and other already-approved industry changes into account, these respondents stated that there does not appear to be an urgency to implement these changes in time for November 2014.

Attachment D contains the full responses made by participants regarding the proposed Implementation Date.

After considering these responses, we believe that it would be more appropriate to implement CP1409 on **25 June 2015** as part of the June 2015 Release to allow participants more time to implement the changes.

5. SVG's initial views

ELEXON presented the 'New CP progression paper' for CP1409 to the SVG at its 1 April 2014 meeting (SVG158/04). No comments or questions were received on the CP. However, the SVG asked industry to note that it would not be making its decision on CP1409 until its 3 June 2014 meeting, so respondents should be particularly vigilant when responding to the consultation question on implementation timescales.

6. Industry views

ELEXON issued CP1409 for CP Impact Assessment via CPC00740. We received 12 responses of which 10 agreed with the CP, one disagreed and one was neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1409 in Attachment D.

Summary of responses for CP1409			
Organisation	**Capacity in which organisation operates**	**Agree?**	**Impacted?**
British Gas	Supplier, Supplier Agent	Yes	Yes
EDF Energy	Supplier, Supplier Agent	Yes	Yes
E.ON	Supplier, Supplier Agent	Yes	Yes
G4S Utility and Outsourcing	Supplier Agent	Yes	Yes

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Summary of responses for CP1409			
Organisation	**Capacity in which organisation operates**	**Agree?**	**Impacted?**
Services (UK) Limited			
IMServ Europe Limited	Supplier Agent	Yes	Yes
RWE Npower	Supplier, Supplier Agent	No	Yes
ScottishPower	Supplier, Generator, Distributor, Supplier Agent	Yes	Yes
Siemens Operational Services	Supplier Agent	Yes	Yes
Smartest Energy Limited	Supplier	Yes	Yes
SSE Energy Supply Ltd	Supplier, Supplier Agent	Yes	Yes
SSEPD	Distributor	Neutral	No
TMA Data Management Ltd	Supplier Agent	Yes	Yes

Most respondents commented that they agree with the change given that the industry is moving towards greater HH Settlement so it seems prudent to put in place a process that allows CoMC from NHH to HH.

The one respondent who disagreed with the CP believes that the change adds more complexity to an already complex process, so they were of the view that this would lead to more confusion and misunderstanding.

Comments on (a) Clarify the appointment process options to improve interoperability

A respondent queried why the appointment process is restricted to the DTC method when the Change of Supplier (CoS) is involved, but not when it is not.

ELEXON clarified that the need to pre-notify the de-appointment and exchange MTDs ahead of the CoMC arises because the HHMOA needs to establish whether a site visit is required and to arrange this visit with the customer. For concurrent CoMC/CoS to work, there needs to be certainty that a site visit is not required or that the site visit can be carried out on the CoS date. Therefore CoMC/CoS requires a fixed date. ELEXON noted that CoMC can work with a moveable date and that the CP1409 changes are intended to facilitate a CoMC with a moveable date. ELEXON also commented that most Issue 49 members were of the view that they would not attempt a concurrent CoS/CoMC.

Comments on (b) Introduce a requirement on the HHMOA to include the time of the initial register reading sent to the HHDC as well as the date

A respondent queried whether the time element in the D0010 'Meter Readings' flow should be populated in Greenwich Mean time (GMT) rather than local time as HH data is in GMT.

ELEXON clarified that the D0010 flow specifies the DATETIME domain as local time, unless specified, so the HHDC will need to make the necessary adjustment.

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Comments on (c) Include an explicit reference to the transfer of commissioning details

A couple of respondents commented that confirmation of commissioning should be included wherever there is a transfer of the Code of Practice (CoP) rating, regardless of being NHH or HH settled, and not just on CoMC.

ELEXON clarified that commissioning itself is already covered by CoP4. The requirement to transfer commissioning details on change of MOA is already covered by BSCP514 2.2.2(c). CP1409 merely emphasises this requirement in the context of CoMC because of its importance to the process.

Comments on (d) Clarify that a notification of removal of the NHH Meter should be sent whether the Meter is physically removed or not

A respondent queried what list of information within the D0150 flow is to be standardised.

ELEXON advised that, currently, some NHHMOAs only send a D0150 flow when a Meter is removed whilst others also send a D0150 flow when a Meter is no longer NHH. ELEXON noted that the intention is to standardise the process so that all NHHMOAs do the same thing and as such, CP1409 intends to standardise the latter approach.

Another respondent commented that they agree with the principle of a D0150 flow confirming the removal of the NHH Meter. However, they do not believe that there is sufficient information sent from the HHMOA to confirm that the NHH functionality has been removed. They noted that this is because the NHHMOA would have to assume that receipt of a D0010 flow with final readings for another MOA implied that the NHH metering had ended. They also advised that this may cause confusion for Meter Asset Providers (MAPs) as there does not seem to be any requirement for the HHMOA to confirm installation of a HH Meter or reconfiguration of the NHH Meter to HH. This is likely to mean the MAP receives a D0303 'Notification of Meter Operator, Supplier and Metering Assets installed / removed by the MOP to the MAP' flow for the removal of the NHH Meter, whether or not the Meter is removed, but nothing to confirm that the Meter is still installed.

ELEXON clarified that the NHHMOA is notifying the Supplier, NHHDC and Distributor that the NHH Meter has been removed or that the Meter is no longer being used as NHH. We advised that the NHHMOA does not need to differentiate between the two cases. We also noted that the MAP will get a D0303 flow from the HHMOA as set out in BSCP514 2.1.3(c).

Comments on (f) Remove the requirement in BSCP504 3.1.4.8 for NHHDCs to send the P0028 '100kW Demand Report' to the Panel

One respondent commented that it is important that the HH data is still reported to ELEXON for Performance Assurance Reporting and Monitoring System (PARMS) purposes and suggested that the word 'Panel' be replaced with 'ELEXON'.

ELEXON advised that it still uses data submitted by Suppliers for PARMS purposes rather than the P0028 from NHHDCs. ELEXON can still request P0028s from Suppliers as PARMS drill-down data, if required.

Another respondent suggested that PARMS Serial SP04 'Installation of HH Metering' should only be reported and queried the effect of P272, as there would be a need to identify CoP10 to CoP5 for 100KW system changes under current CoP arrangements. ELEXON advised that SP04 monitoring is effectively delegated from the Panel to the Performance Assurance Board (PAB) and does not need the PAB to receive a P0028. ELEXON clarified that P272 does not change the 100kW requirement, but there may be reporting implications which would need to be clarified as part of any P272 implementation.

Comments on the proposed redlining

Only one respondent provided comments on the proposed redlined text for CP1409. A summary of these comments and our responses are detailed in the table below.

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Summary of comments on the proposed redlining			
Organisation	**Document name and location**	**Comment**	**ELEXON's recommendation**
RWE Npower	BSCP514 7.1.4	How can this step reference a timescale of 5WDs from 7.1.3 when 7.1.3 may be invoked multiple times if the CoMC fails (where the informal process is used)? Could the timescale here not be 'within 2WD of a successful CoMC'?	ELEXON advised that under the formal approach, the Supplier will appoint the HHMOA for the planned CoMC date using a D0155 'Notification of Meter Operator or Data Collector Appointment and Terms' and the HHMOA will respond using a D0011 'Agreement of Contractual Terms'. Under the pre-notification approach (widely used under MRA Working Practice 66) the process is used but using D0155/D0011 equivalents. In both cases the current timescale of 5 Working Days (WD) is used. The informal process does not invoke the appointment multiple times (only twice, as does the formal process, where the date changes). It pre-notifies the appointment ahead of the planned date and then a formal flow is sent once the date is firm or has passed. For the HHMOA, it is likely that the appointment will be a formal D0155 (even if the NHHMOA/NHHDC de-appointments and HHDC appointments are not) and the Wheatley System requires this. Under the 'informal process' you have a pre-notification of intent, followed once the CoMC date is known by a formal appointment.
	BSCP514 7.1.8	Should there be a 'by other means' option here as most MOA systems will not be able to do anything with the D0142 'Request for Installation or change to a Metering System functionality or the removal of all Meters' if no D0155 has been sent to appoint the site? We	ELEXON clarified that if the MOA needs a D0155 in order to action a D0142 (e.g. Wheatley users), the Supplier will send one. This is why there is optionality in the MRA Working Practice 66 process around the D0155 to the HHMOA and why this optionality is also reflected in the CP1409 solution.

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Summary of comments on the proposed redlining			
Organisation	**Document name and location**	**Comment**	**ELEXON's recommendation**
		would still want to send a D0142 if no D0155 has been received.	
	BSCP514 7.1.9	The MOA probably cannot do this unless the MPAN has been created in their system via a D0155.	As above.
	BSCP514 7.1.14	Why does the HHMOA need to be qualified as a NHHMOA? This is only relevant if the MOA is not changing. The new HHMOA does not need to be NHH qualified. The reference to footnote 18 here makes no sense as footnote 18 refers to the MOA needing to be qualified for CVA and SVA rather than HH and NHH.	ELEXON agreed that footnote 18 is wrong in the current BSCP514 text. Also the Qualification reference (again in the original text rather than the redlined text) seems strange. A HH-qualified MOA should be able to reconfigure an advanced Meter (if required) to operate as HH. ELEXON's recommended changes to the draft redlined text can be found in Attachment C.
	BSCP514 7.1.18	This step requires a change to the DTC to allow instances of D0010 or D0002 between MOA.	ELEXON confirmed that this is an existing 'feature' of the CoMC process. Currently "D0010" and "D0002" data is sent by other means e.g. email. We have drafted a DTC CP and sent it to Gemserv but asked the respondent to note that it is independent of CP1409.

No comments were received on the proposed redlined text for BSCP502 and BSCP504.

7. SVG's final views

We presented CP1409 to the SVG for decision at its meeting on 3 June 2014 (SVG160/06).

An SVG Member commented that, in relation to the change to include an explicit reference to the transfer of commissioning details, although CoP4 includes the requirement to transfer the commissioning details it does not specify the method of transfer. ELEXON advised that CP1409 merely emphasises this requirement in the context of CoMC because of its importance to the process.

In relation to removing the requirement in BSCP504 3.1.4.8 for NHHDCs to send the P0028 '100kW Demand Report' to the Panel, members of the SVG queried whether they had the vires to stop a report being sent to the Panel even though it is an unnecessary regulation. The Chairman advised that the Panel has fully delegated its responsibility for changes to BSCP504 to the SVG. ELEXON noted that the report is not being sent and that it serves no useful purpose.

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An SVG Member queried whether ELEXON is still able to view the P0028 report if the Panel is removed from this requirement. ELEXON confirmed that it receives Suppliers' views of the data via the Performance Assurance Reporting and Monitoring System (PARMS) and can also request 'drill-down' data from NHHDCs if needed. ELEXON noted that the existing requirement in BSCP504 3.1.4.8 for NHHDCs to send the P0028 to Suppliers will remain.

An SVG Member queried why ELEXON has recommended an Implementation Date of the June 2015 Release rather than February 2015 Release. ELEXON advised that as respondents to the CP Impact Assessment had indicated that there would be significant system and process changes involved, they had requested a minimum of nine-12 months to implement the changes. ELEXON commented that as P272 has been pushed back to an earliest Implementation Date of April 2016, there does not appear to be an urgency to implement the changes in time for November 2014 as originally proposed. ELEXON therefore considered that June 2015 would be more appropriate as it would allow participants more time to implement the changes.

The SVG agreed that it made sense to implement CP1409 at the same time as CP1410 and CP1411 (if approved), as this would deliver efficiency savings to ELEXON and participants.

The SVG approved the proposed changes to BSCP502, BSCP504 and BSCP514 for CP1409, and approved CP1409 for implementation on 25 June 2015 as part of the June 2015 BSC Systems Release.

Appendices

None

Attachments

Attachment A – BSCP502 Redlining v0.1

Attachment B – BSCP504 Redlining v0.1

Attachment C – BSCP514 Redlining v0.2

Attachment D – CP1409 Consultation Responses[2]

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[2] Some of the responses received to CP1409 included confidential information. Therefore, the version of Attachment D issued to SVG Members includes the confidential information, while the version published on the BSC Website does not.

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