

Change Proposal Circular – CPC00740 Responses

CPC00740: Impact Assessment of CP1410

Summary of Responses for CP1410

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
British Gas	No	Yes	Yes	Yes
EDF Energy	Yes	Yes	Unknown	No
E.ON	Yes	Yes	Yes	Yes
G4S Utility and Outsourcing Services (UK) Limited	No	Yes	Yes	No
IMServ Europe Limited	Yes	Yes	Yes	Yes
Opus Energy	No	Yes	Unknown	No
RWE npower	No	Yes	Unknown	No
ScottishPower	No	Yes	Unknown	No
Siemens Operational Services	Yes	Yes	Unknown	No
SSE Energy Supply Ltd	Yes	Yes	Yes	Yes
SSEPD	Neutral	No	None	Neutral
TMA Data Management Ltd	Yes	No	N/A	Neutral

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British Gas	<p>How is your organisation impacted? – Ensure contracted agents comply with new obligations</p> <p>What are the associated costs on your organisation to implement the change? – Unspecified.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? This does not appear to be a very efficient solution as it requires 2 D0170s. It would seem more logical for the NHHMOA to send the D0313 without L3 password on receipt of D0170 and then send a 2nd D0313 with L3 password on NHHMOA ETD. Under the current proposal the HHMOA may not request/receive the L3 password which could be an issue if there is a subsequent CoHHMOA.</p>
EDF Energy	<p>How is your organisation impacted? – Possible system and process changes.</p> <p>What are the associated costs on your organisation to implement the change? – Costs cannot be fully determined for this proposal at present time.</p> <p>Agree with the implementation approach? If not, why? – No, with other industry changes already approved for implementation at this time we would prefer a date of February 2015.</p> <p>Any other comments? New MOP appointment and old MOP de-appointment flows are sent in advance of MOP change date (as per CP1409), so MOPs are already aware of an appointment change. Given this, there should be no need to “informally” change agents, and old MOP could act on a D170 from supplier. Would this be a viable alternative process to an “informal” appointment element of this change?</p> <p>The assessment consultation infers that providing outstanding level 3 password to HH MOP “effectively passes control of a meter from NHH MOA to HHMOA”. Whilst this information may be necessary to establish the type of meter to confirm if a site visit is required to re-configure it, there should be some proviso that new MOA should not be reprogramming a meter before their</p>

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	appointed start date.
E.ON	<p>How is your organisation impacted? – MOP and Supplier.</p> <p>What are the associated costs on your organisation to implement the change? – We envisage a ‘small change’ classification.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? No comments.</p>
G4S Utility and Outsourcing Services (UK) Limited	<p>How is your organisation impacted? – We would need to change our existing CoMC processing to create 2 process, one of CoMC and one for concurrent CoMC and COS.</p> <p>What are the associated costs on your organisation to implement the change? – No comment.</p> <p>Agree with the implementation approach? – No. We disagree with the implementation timescales. As this change would require the new Requested action code we would need a period of time from the approval of this MRA change to complete this change. We do not believe November 2014 allows enough time for this.</p> <p>Any other comments? We disagree with the proposed change for the following reasons:</p> <ol style="list-style-type: none"> 1) This change will mean different processes have to be used for change of measurement class and concurrent change of measurement class with change of supply, we believe that potentially this scenario will be as common as the CoMC only where it is not within the same organisation. We believe this adds unnecessary confusion. 2) The proposed process as written is too prescriptive. As a NHH mop we believe we should be able to issue a single set of MTDs before the CoMC date which includes the Level 3 details on the understanding that the new HH mop will not take control of the

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	<p>meter until the CoMC date.</p> <p>3) The use of multiple D0170s for different parties has the potential for mis-aligned request and consequently adds to the complexity of automated processing of these flows and hence increased cost,</p> <p>4) Explicit statement of bilateral agreement in 7.1.12 is unnecessary, we would like to assume that this will be in a D0313, this can always be transferred using another means if required.</p>
IMServ Europe Limited	<p>How is your organisation impacted? – We send D0313s as a MOP.</p> <p>What are the associated costs on your organisation to implement the change? – Minimal.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? No comments.</p>
Opus Energy	<p>How is your organisation impacted? – Please see response to any other comments.</p> <p>What are the associated costs on your organisation to implement the change? – Not determined at this time.</p> <p>Agree with the implementation approach? If not, why? – No</p> <p>Any other comments? We do not believe that informal de-appointment by the Supplier of the NHHMOA is a robust solution. Our preference is for the use of recognised formal DTC flows which would provide a clear audit trail. There are a number of questions that we have regarding CP1410 in its current form:</p> <ul style="list-style-type: none"> • Informal – how would this be tracked and regulated by Suppliers, MOPs and Industry? • Audit – there would be no audit mechanisms for an informal process. • How would parties back out of an informal arrangement if they so wished?

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	<ul style="list-style-type: none"> Who has the responsibility of ensuring the D0313 data is transferred? (how would this work if it was the Supplier's responsibility?) Who has the responsibility for chasing if data is not transferred? How is data clawed back from the HH MOA if the formal appointment (D0155) of the HH MOA does not take place? What is the prompt for the HH MOA to request the D0313 from the NHH MOA in the first instance? <p>Potentially, if the Supplier was to appoint and de-appoint the HHMOA and NHHMOA for a date in the future, the pending time could be used for the contracted NHHMOA to transfer the D0313 to the HHMOA so that this data is migrated before the effective to and from dates of the MOAs.</p>
RWE npower	<p>How is your organisation impacted? – Npower would reject this change proposal. Preliminary analysis indicates that this change would impact MOAs and SME & I&C. In particular, the current process for de-appointing agents requires a D0151, so an amendment will be needed to amend the process so that this is not used in the case of a CoMC. In addition system amendments would be needed to amend the D0170 to accept the new values. It does appear to be a very complicated process involving more work by the Supplier, to get around what is essentially a problem between HH and NHH meter operators.</p> <p>What are the associated costs on your organisation to implement the change? – No comment.</p> <p>Agree with the implementation approach? If not, why? – No</p> <p>Any other comments? ELEXON has also got to take into account the new timeframes being imposed for quicker switching. In particular, as withdrawal flows can be sent up to 2 days prior to a supply start date, a supplier is faced with either sending de-appointment flows early with the potential of having to re-appoint if the supply registration gets withdrawn OR waiting until 2 days before loss date to send the D0151s. This solution is asking suppliers to do what would be a very messy process for de-appointing</p>

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	<p>metering agents earlier than required to enable NHHMOA and HHMOA to see if they are ok to support the CoMC and the meter. This has strong dependencies on quicker switching incentives which are also squeezing the timeframes of de-appointing agents. I also believe that due to quicker switching npower will not be able to send the de-appointment flows to agents until SSD-2 because of CP3042. CP3402 introduces the ability for the customer to withdraw from supply up to SSD-2. If they do that and npower have already de-appointed the agents npower would then need to re-appoint the agents, unnecessarily messy in our opinion.</p> <p>The D0313 flow should not be sent in isolation. The existing DTC rules should be maintained i.e, that the D0313 is always sent as part of a set including the D0149 / D0150. This would minimise development for MOAs. Timing - Sending of the MTDs from the old MOA to the new on the date of the CoMC is no use. Many agents only bring flows in from the gateway at certain times which could result in flows not being received until the evening or even the day after they are sent. The requirement needs to ensure that the complete MTDs (including L3 details) are with the HHMOA the day before the proposed CoMC.</p>
ScottishPower	<p>How is your organisation impacted? – You are adding complexity into the generation of the D0313 data flow, introducing a bi-lateral agreement may not be auditable, audit trail difficulty.</p> <p>What are the associated costs on your organisation to implement the change? – No comment.</p> <p>Agree with the implementation approach? If not, why? – No, similar to CP1409, to fully implement the change a DTC change is required and under the MRA process any system change requires a minimum of 6 months lead time, therefore we believe the earliest implementation date will be February 2015 (assuming any DTC change is approved by the end of August at the latest).</p> <p>Any other comments? We do not agree with the change, the reason behind this view is that we believe that the process is suitable as it stands in that this has the possibility of introducing into the market an agent undertaking activities on a metering system to which they are not appointed.</p>

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Siemens Operational Services	<p>How is your organisation impacted? – Systems: The D0313 flow needs to change to remove the password. The D0170 needs to include new values. M98 needs revising to accept the changed flows. M98 will require testing following the change. If these changes can be developed alongside CP1409, some development and test effort can be combined.</p> <p>Business Operations: Process changes are required to manage the change from NHH to HH without the need for a site visit. These changes are described in CP1409.</p> <p>What are the associated costs on your organisation to implement the change? – This is not possible at this time as it depends on the staffing requirements to implement the Change. More staff would be required if there was a short lead time which would increase the cost of implementation.</p> <p>Agree with the implementation approach? If not, why? – No. For the same reasons as CP1409. An implementation of November 2014 is not practical given the system changes that will be required; this would be less than six months lead time if the CP is approved in June. Plus we don't understand the urgency as this CP is to support Modification P272 which has already been pushed back to an earliest implementation of April 2016. We would propose an alternative implementation date of June 2015 at the earliest.</p> <p>Any other comments? No comments.</p>
SSE Energy Supply Ltd	<p>How is your organisation impacted? – Via our Supplier Agents.</p> <p>What are the associated costs on your organisation to implement the change? – We would incur I.T. development costs as well as additional FTE costs to cover manual intervention in the processing.</p> <p>Agree with the implementation approach? – Yes</p> <p>Any other comments? This change would enable the new MOA to determine, prior to the COMC date, whether they could</p>



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	successfully communicate to the meter.
SSEPD	Agree with the implementation approach? – Neutral Any other comments? No comments.
TMA Data Management Ltd	Agree with the implementation approach? If not, why? – Neutral Any other comments? No comments.

No comments were received on the redlined text for CP1410.