

CP Consultation Responses

CP1419 'Improving data accuracy by enabling the D0312 flow to be sent on a Change of Supplier'



This CP Consultation was issued on 8 September 2014 as part of CPC00746, with responses invited by 3 October 2014.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0 / 1	Supplier Agent
EDF Energy	10 / 0	Generator, Supplier, Non Physical Trader, ECVNA, MVRNA, Supplier Agent, Consolidator
ScottishPower	1 / 0	Supplier, Distributor, Supplier Agent
RWE Npower	10 / 0	Supplier
British Gas	1 / 0	Supplier
DECC	0 / 1	DECC

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✗	✗	✓
EDF Energy	✓	✗	✗	✓
ScottishPower	✓	✓	✗	✓
RWE Npower	✗	✓	✓	✗
British Gas	✓	✗	✗	✓
DECC	✓	✗	✗	✓

Question 1: Do you agree with the CP1419 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
EDF Energy	Yes	It ensures that rejection rates are reduced to allow parties to focus on improving data quality. It also allows for missing data to be provided on events such a CoS and CoA. Our only concern is in such cases if this could increase possibility of incorrect data being provided to ECOES. In these cases a new MOP will have not visited site so cannot verify this data before sending D0312. If it is invalid then it could have a detrimental impact on processes used to allocate prepayment transactions to correct Suppliers which is reliant on accuracy of that data on ECOES. We are not sure if there is any way to check this issue to determine if such a concern is valid or not.
ScottishPower	Yes	It seems appropriate to bring the BSC into line with the MRA, especially given that the relevant MRA change has already been approved.
RWE Npower	No	Given that CP1419 is almost reversing the rules to allow (by option) the sending of the D0312 on a COS or COA; Therefore npower's view is that we don't do this and only continue to send when one of the items in the D0312 flow has actually changed as per the original requirements. npower can foresee numerous issues with the incoming MOP sending a D0312 prior to it's start date by virtue of receiving D0150 D0149 in respect of a COA from the old MOP which is currently held in ECOES. npower would be disappointed to be involved in any ECOES issues arising from inherited standing data if there were mismatches.
British Gas	Yes	-
DECC	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1419 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
EDF Energy	No	<p>For NHH processes BSCP 514 timelines are using current live details. However these are all being changed by CP 1405, to be implemented in November 2014. As such we feel that for NHH metering amendments should be made to align timelines for sending a D0312 on CoS.</p> <p>We assume that any D0312 sent would be done so at same time as new MOP sends out meter technical details. As such we feel that changes to BSCP 514 could be made to align sending of D0312 with that event. It could though be prudent for this to be checked with MOPs to determine if this is a valid assumption. If it is not then we would be fine with changes although for NHH processes we feel that timescales need to reflect CP 1405 changes and that 10WDs should be 1WD for sending a D0312 after meter technical details have been sent to parties.</p>
ScottishPower	Yes	-
RWE Npower	No	npower agree that the redlining delivers the change but don't agree we would be able to deliver the change itself.
British Gas	Yes	-
DECC	Yes	-

Question 3: Will CP1419 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
2	4	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	-
EDF Energy	No	Our MOP has confirmed that this CP will have no impact on their current processes.
ScottishPower	Yes	Only to the extent that it will make us compliant with both the MRA and BSC.
RWE Npower	Yes	System changes would be required.
British Gas	No	-
DECC	No	-

Question 4: Will your organisation incur any costs in implementing CP1419?

Summary

Yes	No	Neutral/No Comment	Other
1	5	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	-
EDF Energy	No	-
ScottishPower	No	-
RWE Npower	Yes	System change costs.
British Gas	No	-
DECC	No	-

Question 5: Do you agree with the proposed implementation approach for CP1419?

Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
EDF Energy	Yes	Alignment with changes required on ECOES is required for this CP to be effective. As such approach to align with ECOES timeframes is appropriate.
ScottishPower	Yes	It makes sense to align the BSC implementation date with that of the MRA change.
RWE Npower	No	-
British Gas	Yes	-
DECC	Yes	-

Question 6: Do you have any further comments on CP1419?

Summary

Yes	No
0	6

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	-
EDF Energy	No	-
ScottishPower	No	-
RWE Npower	No	-
British Gas	No	-
DECC	No	-

BSCP514

Respondent	Location	Comment
EDF Energy	5.2.1.11	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 5.2.1.9.
EDF Energy	5.2.4.11	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 5.2.4.9.
EDF Energy	5.2.7.8	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 5.2.7.7.
EDF Energy	6.2.1.11	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 6.2.1.10. If this alignment is not felt appropriate then we should reduce 10WDs to 1WD to better align with CP 1405 changes.
EDF Energy	6.2.4.11	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 6.2.4.10. If this alignment is not felt appropriate then we should reduce 10WDs to 1WD to better align with CP 1405 changes.
EDF Energy	6.2.5.9	We do not feel that this new section is required but that sending of D0312 to ECOES should be part of 6.2.5.8. If this alignment is not felt appropriate then we should reduce 10WDs to 1WD to better align with CP 1405 changes.