

CP Consultation Responses



CP1424 'Amending the requirement for Data Aggregators to perform Full SMRS Refreshes'

This CP Consultation was issued on 8 December 2014 as part of CPC00749, with responses invited by 9 January 2015.

Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---|--|--|
| British Gas | 1/0 | Supplier |
| EDF Energy | 10/0 | Generator, Supplier, Non-Physical Trader |
| Electricity North West Ltd | 1/0 | Distributor |
| G4S Utility and Outsourcing Services (UK) Limited | 0/1 | Supplier Agent |
| IMServ | 1/0 | Supplier Agent |
| RWE npower | 9/0 | Supplier |
| ScottishPower | 3/0 | Supplier, Distributor, Supplier Agent |
| SSEPD | 2/0 | |
| TMA Data Management Ltd | 0/1 | Supplier Agent |
| Western Power Distribution | 4/0 | Distributor |

Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|---|--------|-----------|--------|-------------|
| British Gas | ✓ | ✗ | ✗ | ✓ |
| EDF Energy | ✓ | ✓ | ✓ | ✓ |
| Electricity North West Ltd | ✓ | ✓ | ✗ | ✓ |
| G4S Utility and Outsourcing Services (UK) Limited | ✓ | ✓ | ✗ | ✓ |
| IMServ | ✓ | ✓ | ✗ | ✓ |
| RWE npower | ✓ | ✗ | ✗ | ✓ |
| ScottishPower | ✓ | ✓ | ✓ | ✓ |
| SSEPD | ✓ | ✓ | ✗ | ✓ |
| TMA Data Management Ltd | ✓ | ✓ | ✓ | ✓ |
| Western Power Distribution | ✓ | ✓ | - | ✓ |

Question 1: Do you agree with the CP1424 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 10 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---|----------|---|
| British Gas | Yes | - |
| EDF Energy | Yes | In principle we are supportive of the proposed changes. However we believe a continuous improvement feedback mechanism is required to prevent issues at source. This would lessen the need for SMRS refreshes. |
| Electricity North West Ltd | Yes | It seems appropriate and beneficial to carry out more targeted refreshes rather than perform them for all agents and SMRA's. |
| G4S Utility and Outsourcing Services (UK) Limited | Yes | The proposed solution removes the requirement for unnecessary full refreshes but still retains a mechanism for require them to ensure settlement accuracy. |
| IMServ | Yes | <p>We believe the SMRS refresh process is a time consuming process that offers limited benefits to all parties involved. It has been noted that the log files for the refresh process do not provide sufficient information to accurately assess how much, or how little, data is changed via this process although the DA's are given an indication once the refresh files have been processed.</p> <p>Once the refresh files have been applied the DA software shows, as a percentage, how much of the refresh file successfully matches the data on the DA database. In our experience this is normally a 100% match although one or twice, over the past ten years or so, we have seen the odd occasion where the percentage has fallen to 98-99% due to the odd MPAN mismatch. These percentages mirror the general feeling of other NHHDA's who attend the STAG meetings where they have all reported that they believe very little data is changed as a result of the refresh process.</p> <p>Historically this appears to have been necessary where some SMRA agents were not consistently sending D209s to the DA's. We believe this is no</p> |

| Respondent | Response | Rationale |
|----------------------------|----------|---|
| | | <p>longer the case and if it was then this would be picked up when the agent is audited. As the D209 files contain a sequence number the DA can monitor these and inform the SMRA agent when they find that they are missing a file in the sequence.</p> <p>As mentioned in the CP the time and cost involved in annually obtaining, testing, and processing the SMRA refresh files (along with the suspended processing of the subsequent D209 files from the SMRA agent once the refresh file has been produced until the point when the refresh file have been applied) has, from a DAs point of view, been long thought of as being disproportionate to the limited benefit that is thought to be provided by this process.</p> |
| RWE npower | Yes | - |
| ScottishPower | Yes | The original purpose of DA refreshes was to correct erroneous data held within individual DA systems. For several years the extent of the correction has had an extremely limited impact compared to the level of time and effort required to coordinate these refreshes and for this reason ScottishPower agree with the Change Proposal. |
| SSEPD | Yes | - |
| TMA Data Management Ltd | Yes | As an NHHDA and HHDA we have not experienced any benefit from regular full refreshes, we wholeheartedly support CP1424 changing the full refresh from a regular requirement to a tool to be used only when necessary. |
| Western Power Distribution | Yes | We have no strong feelings either way on this proposal. If it is felt that the benefits of continuing the automatic full refresh are limited then it makes sense to stop doing it. However, we suggest that the impact of stopping it is reviewed after a couple of years to ensure the quality of settlement data has not reduced as a result. |

Question 2: Do you agree that the draft redlining delivers the CP1424 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 10 | 0 | 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 |
|---|----------|---|
| British Gas | Yes | - |
| EDF Energy | Yes | Yes, however the proposed solution discusses materiality of errors in D0095 and D0023 data flows but the BSCPs are silent on this. |
| Electricity North West Ltd | Yes | We believe the redlining will deliver the proposed solution. |
| G4S Utility and Outsourcing Services (UK) Limited | Yes | Yes – but there seems to be an inconsistency between the redlining of BSCP501 and BSCP503/505. BSCP501 allows for a full refresh of a short settlement period than RF when mutually agreed between the DA and SMRS, whereas BSCP503/505 do not include the mutually agreed full refresh of any settlement period? |
| IMServ | Yes | - |
| RWE npower | Yes | - |
| ScottishPower | Yes | - |
| SSEPD | Yes | - |
| TMA Data Management Ltd | Yes | - |
| Western Power Distribution | Yes | - |

Question 3: Will CP1424 impact your organisation?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 8 | 2 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---|----------|---|
| British Gas | No | - |
| EDF Energy | Yes | It is difficult to assess the impact on our NHHDA systems and processes as there no details to what would be considered a material error by PAB. Whilst we appreciate it is not the intention of the change but a DA may have to perform more than one refresh per year which would increase the effort required on DAs as opposed to reducing it. |
| Electricity North West Ltd | Yes | There would be minimal impact and that would only occur if high volumes were received. However, the MPRS6.5 upgrade due early next year does have the facility for multiple MPAN refreshes which would reduce the time taken. |
| G4S Utility and Outsourcing Services (UK) Limited | Yes | G4S will have a slight reduction in the operational support time needed to run the NHHDA service. No lead time is required to make these changes. |
| IMServ | Yes | This will remove the need to annually apply the SMRS refreshes. As we split our refreshes through the year, and the implementation date for the CP is June 2015, we will need to request/apply a number of HH refreshes in March and a number of NHH refreshes in May. |
| RWE npower | No | - |
| ScottishPower | Yes | <p>New processes will be required to manage the ad-hoc requirement for Full Refreshes. There may be additional set-up costs, processes and lead times related to ad-hoc refreshes if these become irregular occurrences.</p> <p>From an HHDA viewpoint the removal of mandatory refreshes will significantly reduce the level of manual intervention required to "re-correct" erroneous changes effected by the refreshes. ScottishPower HHDA operates processes which identify data inconsistencies and trigger corrective</p> |

| Respondent | Response | Rationale |
|----------------------------|----------|--|
| | | actions which mirror the effect of a refresh. SP HHDA is supportive of this change as we do not believe the annual refresh requirement brings any benefit. |
| SSEPD | Yes | Very low impact no system changes. |
| TMA Data Management Ltd | Yes | The impact of CP1424 is procedural with some minor system impact. |
| Western Power Distribution | Yes | Potentially removes the need for us to generate and send certain refreshes. However, it may increase the volume of selective refreshes. |

Question 4: Will your organisation incur any costs in implementing CP1424?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 3 | 6 | 1 | 0 |

Responses

| Respondent | Response | Rationale |
|---|----------|---|
| British Gas | No | - |
| EDF Energy | Yes | As above, costs are essentially in direct relation to the frequency of the number of refreshes required to be carried out. |
| Electricity North West Ltd | No | We believe we could incorporate this within our business as usual activities. |
| G4S Utility and Outsourcing Services (UK) Limited | No | - |
| IMServ | No | - |
| RWE npower | No | - |
| ScottishPower | Yes | There will be costs incurred in creating new processes to manage the ad-hoc requirement for Full NHHDA Refreshes. There may be additional set-up costs and lead times related to ad-hoc refreshes if these become irregular occurrences. If the number of ad-hoc refreshes is lower than the current mandatory refreshes then the running costs will be lower. |
| SSEPD | No | Reduces unnecessary costs. |
| TMA Data Management Ltd | Yes | The changes to our systems and procedures would be minor, incurring minor costs but we would benefit from cost reduction from CP1424's implementation by lowering the effort to manage, monitor and process the 13 monthly full refreshes from all SMRS agents. |
| Western Power Distribution | Yes/No | On the face of it it should marginally reduce costs although this will depend in whether there is any corresponding increase in numbers of selective refreshes. |

Question 5: Do you agree with the proposed implementation approach for CP1424?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 10 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---|----------|--|
| British Gas | Yes | - |
| EDF Energy | Yes | - |
| Electricity North West Ltd | Yes | The proposal to implement this CP as part of the next available release (25/06/2015) does seem a reasonable approach. |
| G4S Utility and Outsourcing Services (UK) Limited | Yes | - |
| IMServ | Yes | - |
| RWE npower | Yes | - |
| ScottishPower | Yes | The timescale seems reasonable provided that a transition between the current and the new process is managed (see comments in Question 6). |
| SSEPD | Yes | - |
| TMA Data Management Ltd | Yes | We would agree with the earliest possible implementation date, June 2015, but would seek clarification on full refreshes that are due prior to June 2015. Could ELEXON clarify, should CP1424 be accepted and implemented, that no full SMRS refreshes would be mandated for 2015? |
| Western Power Distribution | Yes | - |

Question 6: Do you have any further comments on CP1424?

Summary

| Yes | No |
|-----|----|
| 3 | 7 |

Responses

| Respondent | Response | Comments |
|---|----------|--|
| British Gas | No | - |
| EDF Energy | No | - |
| Electricity North West Ltd | No | - |
| G4S Utility and Outsourcing Services (UK) Limited | No | - |
| IMServ | Yes | Should ELEXON consider requesting that the log files generated by applying the refreshes be re-written, so that in future should a refresh be deemed necessary by BSCCo or PAB, all parties will have a better indication of the impact of applying the refresh? |
| RWE npower | No | - |
| ScottishPower | Yes | <p>1) It is not clear how ELEXON will manage the transition period between the current Mandatory NHHDA Refreshes and the implementation of the new schedule as directed by ELEXON / PAB. There will be NHHDA refreshes scheduled around the time of the CP1424 Implementation Date. If the 13 month refresh window extends past 25 June 2015 will the refresh no longer be mandated under the previous regulations?</p> <p>2) The Proposed Solution [CP1424 CP Consultation, page 3] states that "ELEXON does not propose to use a pre-determined level of exceptions or quantity of MPANs" to instigate a Full Refresh. Similarly Refreshes "will be mandated only where the level of error ... is considered to be excessive". What are the guidelines or trigger points envisaged by ELEXON so that the SMRA and/or NHHDA can prepare for a full refresh? If there is no longer a regular schedule for Refreshes then arguably there will be a greater lead time required to run what</p> |

| Respondent | Response | Comments |
|----------------------------|----------|--|
| | | would become a non-standard process. |
| SSEPD | No | - |
| TMA Data Management Ltd | Yes | As mentioned in our response to question 5, we would like to receive clarification on full SMRS refreshes that would need to be performed before June 2015 to comply with the current 13 monthly obligation. |
| Western Power Distribution | No | - |

CP Redlined Text

No comments were received on the proposed redlined changes to BSCP501, BSCP503 or BSCP505.