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| P302 ‘Improve the Change of Supplier Meter read and Settlement process for smart Meters’ |

Response Form

We welcome your views and responses to the questions set out in this response form. To help us understand your response, please provide supporting reasons for your answers where possible. We also encourage you to provide financial information showing any costs and/or benefits of this change to your business.

**ELEXON can treat any information provided as confidential if you request this**, although we will provide all information to the Authority.

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| **Your response** |
| We invite you to respond to the questions in this form. |
| **Description: email_us_go_online** |
| **How to return your response** |
| Please send responses, entitled ‘P302 Second Assessment Consultation’, to [**bsc.change@elexon.co.uk**](mailto:bsc.change@elexon.co.uk) by **5pm** on  **Friday 6 February 2015**. |

Your Details

| Respondent | |
| --- | --- |
| Name |  |
| Organisation |  |
| Contact telephone number |  |

| Parties Represented | | | | |
| --- | --- | --- | --- | --- |
| Names of BSC Parties |  | | | |
| Names of non-Parties |  | | | |
| BSC Party role(s) represented (mark all that apply) |  | Generator |  | Supplier |
|  | Distributor |  | Interconnector User |
|  | Int. Administrator |  | Int. Error Admin. |
|  | Non Physical Trader |  | Transmission Co. |
| Non-Party role(s) represented (mark all that apply) |  | ECVNA |  | MVRNA |
|  | Supplier Agent: |  | Other: |
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| Confidentiality | |
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| Does this response contain confidential information? | If ‘Yes’, please clearly mark the confidential parts |

Assessment Procedure Consultation Questions

| **Question 1** | |
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| Do you agree with the Workgroup that the draft BSC and CSD changes in Attachments A-C deliver the intention of P302? |  |
| Please provide your rationale. | |
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| **Question 2** | |
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| Are the timescales set out in BSCP504 for the alternative solution, where the old NHHDC validates the read and generate the D0086 data flow, achievable? |  |
| Please provide your rationale. | |
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| **Question 3** | |
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| Are the timescales set out in BSCP514 for both the proposed and alternative solution, where the new MOA provides the MTDs, achievable? |  |
| Please provide your rationale. | |
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| **Question 4** | |
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| Are there any other potential Alternative Modifications within the scope of P302, which would better facilitate the Applicable BSC Objectives? |  |
| Please provide your rationale and, if ‘No’, please provide full details of your Alternative Modification(s) and your rationale as to why it/they better facilitate the Applicable BSC Objectives. | |
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| **Question 5** |
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| What are the potential risks to Settlement for the proposed solution and the alternative solution? |
| Please provide your rationale. |
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| **Question 6** |
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| What controls do you believe should be put in place to mitigate any associated risks? |
| Please provide your rationale. |
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| **Question 7** | |
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| Will P302 impact your organisation? |  |
| If ‘Yes’, please provide a description of the impact(s) and any activities which you will need to undertake between the Authority’s approval of P302 and the P302 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state any difference in impacts between the Workgroup’s proposed solutions. | |
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| **Question 8** | |
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| Will your organisation incur any costs in implementing P302? |  |
| If ‘Yes’, please provide details of these costs, how they arise and whether they are one-off or on-going costs. Please also state whether it makes any difference to these costs whether P302 is implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in costs between the Workgroup’s proposed solutions. | |
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| **Question 9** |
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| How long (from the point of Authority approval) would you need to implement P302? |
| Please provide an explanation of your required lead time, and which of the activities listed in your previous answers on impacts are the key drivers behind the timescale. Please also state whether it makes any difference to this lead time whether P302 is implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in lead times between the Workgroup’s proposed solutions. |
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| **Question 10** | |
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| Do you agree with the Workgroup’s recommended Implementation Date? |  |
| Please provide your rationale. | |
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| **Question 11** | |
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| Do you agree that a concurrent change of SSC on CoS should be treated as having taken place on the SSD, so long as the re-configuration of the Meter was carried out no later than SSD+5 WD? |  |
| Please provide your rationale. | |
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| **Question 12** |
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| Which option do you consider most successfully mitigates the risks of under/over billing, delays in billing or re-billing? To what extent do these risks increase or decrease relative to the current arrangements? |
| Please provide your rationale. |
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| **Question 13** | |
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| Do you agree that the new Supplier should transfer readings to the old Supplier using a D0010 data flow? If not, what alternatives would you recommend and rationale for these? |  |
| Please provide your rationale. | |
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| **Question 14** | |
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| Do you agree that a third D0155 data flow is not needed when communications are restored, and that only the first D0155 data flow sent should have a corresponding D0151 data flow? |  |
| Please provide your rationale. | |
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| **Question 15** | |
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| Do you agree that the old Supplier should send an additional D0311 data flow in the event that it sends an estimated read following a communication failure (at SSD+3 WD) but is subsequently able to retrieve a midnight reading(s)? If so, should this be applied to both the proposed and the alternative solutions? |  |
| Please provide your rationale. | |
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| **Question 16** | |
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| Do you agree that the scope of the D0311 data flow should be extended to include DCC-serviced non-domestic Metering Systems and made mandatory for this solution? |  |
| Please provide your rationale. | |
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| **Question 17** | |
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| Do you agree that the midnight reading(s) need to be validated by the NHHDC, but do not need to be validated by the NHHDC before they are sent in the D0311 data flow to the new Supplier? |  |
| Please provide your rationale. | |
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| **Question 18** | |
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| Do you agree that the timescales for sending the D0311 data flow in the legacy CoS process should be brought forward to SSD+3 WD to align with the proposed smart process? Should this be applied to both the proposed and alternative solutions? |  |
| Please provide your rationale. | |
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| **Question 19** | |
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| Do you agree that where the old Supplier is unable to obtain a reading (under the proposed solution) that responsibility for requesting a reading should rest with the old Supplier, rather than having the new Supplier proactively identify that the old Supplier is missing a reading (by means of the D0311 data flow)? |  |
| Please provide your rationale. | |
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| **Question 20** |
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| To what extent do you consider that each option supports fast accurate billing for both Suppliers? Do you consider that one option facilitates faster billing than the other, and if so, what is the likely magnitude of the difference (e.g. in days)? |
| Please provide your rationale. |
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| **Question 21** | |
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| Do you believe that the Proposed Modification better facilitates the Applicable BSC Objectives than the baseline? |  |
| Please provide your rationale. | |
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| **Question 22** | |
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| Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the baseline? |  |
| Please provide your rationale as to why it/they better facilitate the Applicable BSC Objectives. | |
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| **Question 23** | |
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| Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the Proposed Modification? |  |
| Please provide your rationale as to whether it/they better facilitate the Applicable BSC Objectives. | |
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| **Question 24** | |
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| Do you have any further comments on P302? |  |
| If ‘Yes’, please provide your comments. | |
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Further Information

To help us process your response, please:

* Email your completed response form to [**bsc.change@elexon.co.uk**](mailto:bsc.change@elexon.co.uk), entering “P302 Second Assessment Consultation” in the subject line
* Clearly indicate any confidential parts of your response
* Respond by **5pm** on **Friday 6 February 2015** (the Workgroup may not be able to consider late responses)

The Workgroup will consider your consultation response at its next meeting. Once it has completed its assessment of P302, it will draft the Assessment Report, and present it to the Panel at its meeting on 12 March 2015.

#### Applicable BSC Objectives

The Applicable BSC Objectives are:

1. The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
2. The efficient, economic and co-ordinated operation of the National Transmission System
3. Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
4. Promoting efficiency in the implementation and administration of the balancing and settlement arrangements
5. Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
6. Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation