

CP Assessment Report

CP1446 'Allow smart CoS agreed Disputed Reads to be entered into Settlement'

ELEXON



Committee

Supplier Volume Allocation Group

Recommendation

Approve

Implementation Date

30 June 2016 (June 2016 Release)



Contact

David Kemp

020 7380 4303

david.kemp@elexon.co.uk



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1446 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 3 November 2015. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1446.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1446 solution.
- Attachment B contains the full responses received to the CP Consultation.

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1 Why Change?

What is the disputed reads process?

The [Master Registration Agreement \(MRA\) Agreed Procedure \(MAP\) 08 'The Procedure for Agreement of Change of Supplier Readings and Resolution of Disputed Change of Supplier Readings'](#) sets out the process under which Suppliers can dispute Meter readings taken as part of a Change of Supplier (CoS). The relevant [BSC Procedures \(BSCPs\)](#) detail how the corrected values are entered into Settlement once a disputed read has been agreed between the old Supplier and the new Supplier.

For Non Half Hourly (NHH) Metering Systems, the process for correcting a disputed CoS reading is laid out in BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'. This process works as follows:

- On agreement of a disputed read, the new Supplier will send a [D0300 'Disputed Readings or Missing Readings on Change of Supplier'](#) data flow to their NHH Data Collector (NHHDC) containing details of the read. The new NHHDC will then validate the D0300 data flow in accordance with BSCP504.
- If the flow passes validation, the new NHHDC will send a [D0086 'Notification of Change of Supplier Readings'](#) data flow to the new Supplier, the old NHHDC and the Licenced Distribution System Operator (LDSO). The old NHHDC will then pass this flow on to the old Supplier.
- If either of the NHHDCs deem a data flow to fail validation the process will need to start over with a revised agreed reading.

How will P302 impact this process?

Approved Modification [P302 'Improve the Change of Supplier Meter read and Settlement process for smart Meters'](#) will introduce a new CoS process to be used for any smart Metering Systems that are registered with the Data and Communications Company (DCC). This process recognises the ability of both the old and the new Supplier to be able to independently obtain an opening/closing reading from such a smart Meter. Consequently, it seeks to enable each Supplier (old and new) and its Supplier Agents to be able to act with as little dependency on the other as possible. P302 will be implemented on 30 June 2016 as part of the June 2016 BSC Systems Release.

The approved P302 solution will retain the current provisions for correcting disputed CoS readings under the new CoS process, as outlined above.

What is the issue?

Following the approval of P302 the MRA's [Issues Resolution Expert Group \(IREG\)](#) reviewed MAP08 to identify any necessary consequential changes. This review highlighted that, where a disputed reading has been agreed for a Metering System that has gone through the P302 CoS process, it may not be appropriate for both the old and new NHHDCs to process the same replacement reading(s), or to process the replacement readings in respect of the same Settlement Registers. For example, following implementation of P302, the new Supplier will be able to reconfigure the smart Meter on a CoS to support the tariff it has offered to the customer. This may result in the Meter recording consumption on different Settlement Registers to that of the old Supplier. As a result the D0086 data flow



What is the CoS process?

The CoS process is followed whenever a customer elects to change their Supplier. The process ensures that the final reading used by the old Supplier and the opening reading used by the new Supplier match up, or were taken at the same time in the event that the new Supplier reconfigures the Settlement Registers on CoS. This ensures that all energy is accounted for in Settlement.



What is the full P302 solution?

The full details of the approved P302 solution can be found in the [P302 Final Modification Report](#).

P302 will only apply to smart Meters that are registered with the DCC (or, by agreement between the old and new Supplier, to Meters that comply with the Smart Metering Equipment Technical Specifications (SMETS) but are not registered with the DCC). All other Meters will continue to follow the existing CoS process.

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passed from the new NHHDC to the old NHHDC may not match the old Supplier's configuration and will therefore fail validation. This will lead to discrepancies between the readings, and also uncertainty for the old Supplier as to what reading has been used by the new Supplier, as the Disputed Reads process would not have closed.



Summary diagrams

Diagrams summarising the sending of D0300 and D0086 data flows under the current and proposed processes can be found in Appendix 1.

Proposed solution

[CP1446 'Allow smart CoS agreed Disputed Reads to be entered into Settlement'](#) was raised by EDF Energy on 13 August 2015. It proposes to amend the process for correcting disputed CoS reads for smart Meters under P302 as follows:

- On agreement of a disputed read, either or both the old and the new Supplier (as applicable¹) will send an agreed D0300 data flow to their respective NHHDCs.
- On receipt of the request from the relevant Supplier, the relevant NHHDC (old and/or new) will validate the D0300 data flow.
- If the flow passes validation, the NHHDC(s) will send a D0086 data flow to their Supplier and the LDSO. If the D0300 data flow fails validation, the NHHDC will inform their Supplier, who will need to send a revised D0300 data flow.

This process will allow each Supplier (old and new) and its Supplier Agents to be able to act independently of the other. As a result, it will remove the risk of a D0086 data flow failing validation due to the two Suppliers using different configurations for the Meter.

The existing process for disputing a CoS reading for a non-smart or non-DCC registered Meter will remain unchanged by this CP.

It should be emphasised that CP1446 does not propose to change the processes around agreeing a read once a dispute has been raised; this is covered under MAP08 and lies outside of BSC governance. CP1446 proposes only to amend the subsequent process for correcting the read in Settlement upon conclusion of the MAP08 process.

Alongside this, CP1446 will also make a housekeeping amendment in response to a comment made by Ofgem (as the Authority) in its [P302 Decision Letter](#). Ofgem considered that the change to BSCP504 regarding which reading should be used as the CoS reading was not as clear as it could be. CP1446 proposes to amend this step to clarify that, where available, the instantaneous reading taken by the new Supplier at the point of reconfiguration (rather than the midnight reading from the Daily Read Log) should be used by both Suppliers as the CoS read.

Proposer's rationale

The Proposer believes that this change will allow an agreed disputed CoS read for a smart Meter to be entered into Settlement correctly. Without this change, they believe that there could be potential overlaps or gaps in the consumption settled.

Proposed redlining

Attachment A contains the proposed changes to BSCP504 to deliver CP1446.

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¹ Depending on whether the initial reading(s), closing reading(s) or both are subject to the dispute.

3 Impacts and Costs

Central impacts and costs

CP1446 will require changes to BSCP504. No system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1446 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP504	<i>None</i>

Impacts on other industry documents

If CP1446 is approved, changes will also be needed to MAP08 under the MRA to reflect the revised exchanges of D0300 and D0086 data flows following agreement of a read. MRA Solution Pre-Assessment Form (SPF) 0089 'MAP08 changes following approval of BSC Modification Proposal P302' is currently being progressed and any corresponding changes for CP1446 can be considered as part of this.

BSC Party & Party Agent impacts and costs

CP1446 will impact Suppliers and NHHDCs, who will need to amend systems and processes to implement CP1446. Nine of the ten respondents to the CP Consultation felt that this would have an impact on their organisation, but views were mixed as to whether this would have a minor impact or would be a more significant impact on their systems. Three participants noted the costs could be absorbed into their costs for delivering P302, but three other respondents noted that they had not been able to assess the costs of CP1446 at this time.

No other BSC Parties or Party Agents are expected to be impacted, and no such impacts were highlighted in the CP Consultation responses.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	Amendments are expected to be required to processes being put in place for P302.
NHHDCs	

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4 Implementation Approach

Recommended Implementation Date

CP1446 is proposed for implementation on **30 June 2016** as part of the June 2016 BSC Systems Release.

P302 has been approved for implementation in the June 2016 Release. CP1446 proposes to amend a part of this solution, and the Proposer considers that this change should be made at the same time in order to minimise the impact on participants. We agree that this is a sensible implementation approach for this change.

Eight of the ten respondents to the CP Consultation agreed with this proposed Implementation Date, generally agreeing that CP1446 should be implemented alongside P302. However, two respondents disagreed with implementing CP1446 in June 2016. One highlighted that the debate around the equivalent changes to P302 within the gas industry is still ongoing, while the other felt further consideration of the proposed CP1446 solution was still needed (see Section 6).

5 Initial Committee Views

SVG's initial views

The SVG considered CP1446 at its meeting on 1 September 2015 ([SVG175/04](#)). It had no initial comments on this CP and did not ask for any additional questions to be added to the CP Consultation.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1446 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1446 proposed solution?	8	2	0	0
Do you agree that the draft redlining delivers the intent of CP1446?	7	3	0	0
Will CP1446 impact your organisation?	9	1	0	0
Will your organisation incur any costs in implementing CP1446?	6	4	0	0
Do you agree with the proposed implementation approach for CP1446?	8	2	0	0
Do you have any further comments on CP1446?	2	8	0	0

Comments on CP1446

Views in support of CP1446

Eight of the ten respondents to the CP Consultation agreed with the proposed CP1446 solution.

One respondent noted that CP1446 appropriately mitigates the risk of NHHDCs not being able to validate disputed readings for DCC-registered Meters. Without this they felt the number of Supplier Agreed Reads would likely increase, negatively impacting Suppliers' ability to issue timely and accurate statements to customers. Another respondent noted that this change brings the disputed reads process into line with the rest of P302. A further respondent believed CP1446 would go some way to addressing issues where the most accurate read has not been used, with Supplier Agents instead producing deemed reads.

One respondent who supported CP1446 queried how the old NHHDC would know if a foundation Smart Metering Equipment Technical Specifications (SMETS1) Metering System was registered under the DCC. We note that [Data Transfer Catalogue \(DTC\) CP 3471 'Introducing a smart CoS process indicator'](#) will introduce a new data item into the D0155 'Notification of Meter Operator or Data Collector Appointment and Terms' data flow to note whether the 'smart CoS process' should be used. The MRA Development Board (MDB) will make its decision on the progression of DTC CP 3471 at its meeting on 29 October 2015. Suppliers can apply this flag to any applicable Metering System, including SMETS1 Metering Systems. It may be that Suppliers will need to re-send the D0155 data flow if this information was to change following the NHHDC's appointment. However, this does not form part of the CoS process and so is not an issue that CP1446 can resolve.

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Views against CP1446

The remaining two respondents did not agree with the proposed solution.

One of these respondents highlighted there remains reliance on Suppliers to agree the D0300 data flow, and asked how Suppliers would reach agreement when using different configurations and different Settlement Registers. We note that the D0300 data flow would need to be agreed as part of the disputed reads process under MAP08, and so this is not a question that CP1446 can answer.

The same respondent also queried what would happen to energy where there was a prolonged delay before the new Supplier's configuration was downloaded to the Meter (e.g. due to communication issues). If there was such a delay, the P302 Workgroup agreed that a potential additional liability for the old Supplier of up to five Working Days was consistent with the existing window in which CoS readings can be re-dated. However, this part of the P302 solution is outside of the scope of CP1446.

The other respondent highlighted concerns with the maintenance of accuracy where the two NHHDCs are independently creating D0086 data flows, in particular where there has been no change in the Meter's configuration. They consider that allowing the separate Supplier Agents to act independently would reduce the natural controls that exist now when a Meter's configuration does not change. They are concerned that CP1446 could result in energy being double-counted or missed and believe more controls are needed.

We highlight that the process put forward under CP1446 aligns with that approved under P302 for the receipt and validation by NHHDCs of the original agreed CoS read. Under P302, the new Supplier will be responsible for obtaining the reads from the Meter and passing this to the old Supplier. Each Supplier will then independently send the relevant information to their respective NHHDCs. Each NHHDC will then validate the read and send a D0086 data flow back to their respective Suppliers. This would be the case irrespective of whether the Meter had been reconfigured by the new Supplier. We therefore believe that adopting the same process under CP1446 for correcting a disputed read in Settlement is appropriate. Furthermore, the old and new NHHDCs will not be requested to process the replacement readings until their respective Suppliers (both of whom have access to the smart Meter) have come to a mutual agreement that these readings are correct.

Comments on the proposed redlining

One respondent queried whether the proposed changes in BSCP504 Section 3.2.6.58 should specify the approach to be taken where the agreed reading is available within five Working Days of the CoS date. They believe that in this situation the process should require an actual reading to be issued for the CoS date. We note that the reference in the redlining to using a deemed read is in reference to the agreed reading being outside of five Working Days of the CoS date; if the read was within five Working Days then the actual read should be used. We believe that the current wording, taken from the wording for the existing process, does not require any changes.

One respondent commented that there was insufficient information on how the D0300 data flow would be agreed. Again, we note that the D0300 data flow would be agreed under the MAP08 process and so this detail does not need to be included within BSCP504.

Several respondents highlighted an error in the proposed legal text where part of row 44 and the whole of row 45 of BSCP502 Section 3.2.6 had not been copied across from the approved P302 legal text that CP1446 was based on. We can confirm that this was a

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configuration error on our part, and has been corrected in the attached version of the BSCP504 redlining. The substance of CP1446 has not been affected by this error.

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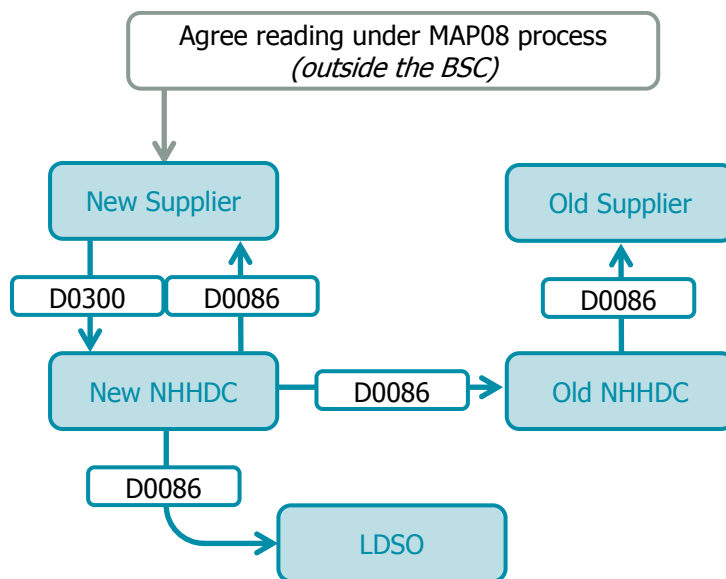
7 Recommendations

We invite you to:

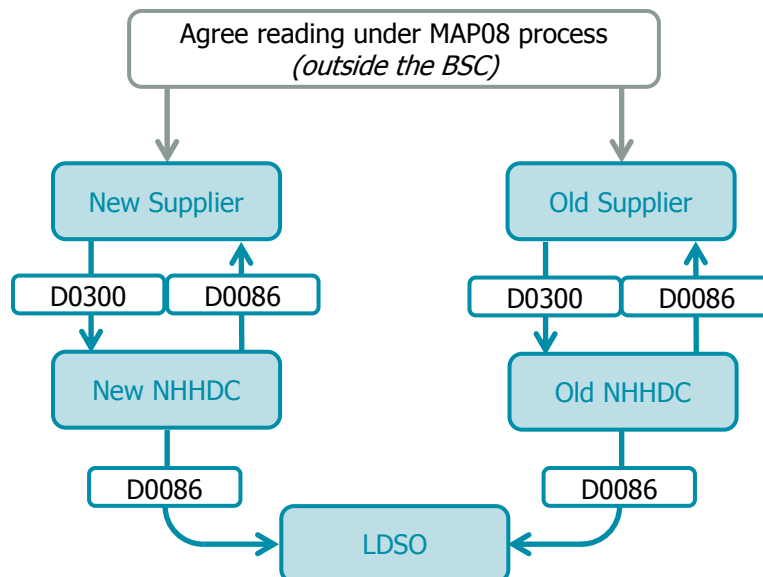
- **AGREE** the amendments to the proposed redlining for BSCP504 for CP1446 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP504 for CP1446; and
- **APPROVE** CP1446 for implementation on 30 June 2016 as part of the June 2016 Release.

Appendix 1: Summary Diagrams

Current process for all Meters



Proposed process for DCC-registered smart Meters only



Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CoS	Change of Supplier
CP	Change Proposal
DCC	Data and Communications Company
DTC	Data Transfer Catalogue
IREG	Issues Resolution Expert Group (<i>MRA Group</i>)
LDSO	Licensed Distribution System Operator (<i>BSC Party</i>)
MAP	MRA Agreed Principle (<i>MRA procedural document</i>)
MDB	MRA Development Board (<i>MRA sub-committee</i>)
MRA	Master Registration Agreement (<i>industry Code</i>)
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector (<i>Party Agent</i>)
SMETS	Smart Metering Equipment Technical Specifications
SPF	Solution Pre-Assessment Form
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0086	Notification of Change of Supplier Readings
D0155	Notification of Meter Operator or Data Collector Appointment and Terms
D0300	Disputed Readings or Missing Readings on Change of Supplier

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External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	MRA Service Company website	http://www.mrasco.com/
2	MRA Agreed Principles page on the MRASCo website	http://www.mrasco.com/mra-products/mra-agreed-procedures
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	D0300 entry in the Data Transfer Catalogue	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0300&FlowVers=1&searchMockFlows=False
2	D0086 entry in the Data Transfer Catalogue	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0086&FlowVers=2&searchMockFlows=False
2	P302 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p302/
2	IREG page on the MRASCo website	http://www.mrasco.com/meetings/ireg
4	CP1446 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1446/
4	P302 Decision page on the Ofgem website	https://www.ofgem.gov.uk/publications-and-updates/balancing-and-settlement-code-bsc-p302-improving-change-supplier-meter-read-process-smart-meters
6	SVG175 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-175/
7	DTC CP 3471 page on the MRA Service Company website	https://mra.mrasco.com/change/introducing-a-smart-cos-process-indicator/