

CP Consultation Responses



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

This CP Consultation was issued on 7 September 2015 as part of CPC00759, with responses invited by 2 October 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Western Power Distribution	1 / 0	Distributor
Imserv Europe Ltd	0 / 1	Supplier Agent
TMA Data Management Ltd	0 / 1	Supplier Agent
SSE Energy Supply Limited	1 / 0	Supplier
ScottishPower Energy Retail	1 / 0	Supplier
E.ON Energy Solutions	1 / 0	Supplier
EDF Energy	9 / 0	Generator, Supplier, Non Physical Trader, ECVNA, Supplier Agent, Consolidator
Siemens Managed Services	0 / 1	Supplier Agent
British Gas	1 / 0	Supplier
STARK	0 / 1	Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Western Power Distribution	✓	✗	✗	✓
Imserv Europe Ltd	✓	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✓	✓
ScottishPower Energy Retail	✓	✓	✓	✓
E.ON Energy Solutions	✗	✓	✓	✗
EDF Energy	✓	✓	✗	✓
Siemens Managed Services	✓	✓	✓	✓
British Gas	✗	✓	✗	✗
STARK	✓	✓	✗	✓

Question 1: Do you agree with the CP1446 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	-
SSE Energy Supply Limited	Yes	<p>We recognise the case for change and support the proposed solution. The settlement risk of NHHDC not being able to validate disputed CoS reads for DCC-serviced meters is appropriately mitigated by this proposal. Furthermore, if industry does not implement this solution then we would expect Supplier Agreed Reads to increase, which would have a direct negative impact on Suppliers ability to issue accurate and timely statements to customers.</p> <p>The clarification regarding 'instantaneous' readings (3.2.6.44) is also supported and should avoid potential differences in interpretation of P302 solution.</p>
ScottishPower Energy Retail	Yes	P302 has stipulated that if only 1 party has obtained a reading then the D0300 process would be required to ensure that readings are entered into Settlement.
E.ON Energy Solutions	No	<p>There remains a reliance to agree a D0300, the means by which is not stated. There also remain unanswered questions as to how this will be agreed between parties when using completely different configurations that may utilise different meter registers.</p> <p>It also not clear to us how this would work in instances where there is a prolonged delay between a losing supplier removing their configuration from a meter and the new supplier setting theirs. In these instances it would seem unfair to the losing supplier and customer that they are required to settle and bill to the gaining suppliers' readings which in some circumstances could be some days post the original</p>

Respondent	Response	Rationale
		<p>agreed SSD.</p> <p>It is also unclear how this would play out with faster switching arrangements in the future.</p>
EDF Energy	Yes	-
Siemens Managed Services	Yes	<p>This will impact us as a NHHDC. Agree with this change on the basis that it brings the Disputed Reads process into line with the new general Change of Supplier for DCC-serviced meters. We have some general concerns that data quality could be impacted if the Smart COS process is not followed, for example if the Smart COS Process Indicator is not populated correctly on the D0155, or if there are communication problems such that the Smart COS process cannot be followed, but we do not receive the D0170 instructing us to follow the legacy process instead. This could also impact processing of the D0300, as the rules will be different depending on whether Smart COS or legacy COS has been followed.</p>
British Gas	No	<p>We agree with the proposed solution in the specific scenario where a new supplier has amended the metering configuration on a change of supply. However we believe that the change proposal does not go into enough detail to cover how the accuracy of settlement will be maintained where there isn't a change in configuration and on how the creation of separate D0086s will be managed. There should be further clarification and controls built into the change proposal to cover some other areas that we have summarised in question 6.</p>
STARK	Yes	<p>As an NHHDC agent primarily using up to date AMR readings we have found the main problem is when the most accurate read has not been used i.e. new agents using deemed instead of the history we have provided or incompatible reads due to a unknown system change; associated with this is the deficiency in Supplier to Supplier communication, which can result in an excessive amount of time for resolution.</p> <p>CP1446 appears to go some way to address these issues for the Smart process by introducing the direct information exchange between Suppliers at an early stage, which in principle should be of benefit to all.</p>

Question 2: Do you agree that the draft redlining delivers the CP1446 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	3	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
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	-
SSE Energy Supply Limited	Yes	-
ScottishPower Energy Retail	No	See section at the bottom of this form.
E.ON Energy Solutions	No	There is insufficient detail as to how the D0300 would be agreed.
EDF Energy	Yes	-
Siemens Managed Services	No	Section 3.2.6.46 references 3.2.6.45, but 3.2.6.45 is missing from the redline document. It's not clear who sends the reads to the old NHHDC. It also appears that 3.2.6.45 is also missing from the version of BSCP504+P302 that was used as the base line.
British Gas	Yes	The redlining delivers the proposed solution. We feel that the proposed solution requires more detail.
STARK	Yes	-

Question 3: Will CP1446 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
9	1	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No	-
Imserv Europe Ltd	Yes	As an NHHDC we will need to make appropriate changes to systems and to roll out training to system operators to ensure disputed reads on DCC serviced meters are handled as outlined
TMA Data Management Ltd	Yes	CP1446 would impact systems and procedures.
SSE Energy Supply Limited	Yes	This will require some significant changes in addition to those planned for as part of the P302 delivery. We do, however, recognise this is necessary to mitigate the negative impacts that inaction would have upon settlements and our customers.
ScottishPower Energy Retail	Yes	This change will require amendments to our core systems, as the logic to trigger the D0300 will require to reflect the changes made to BSCP504. The population of the D0300 flow will also require to accommodate the changes proposed. The changes may result in an increase in D0300 flows being triggered/received, which would have an impact on resource allocation to work on this process.
E.ON Energy Solutions	Yes	The lack of detail means it is difficult to fully quantify this at this time.
EDF Energy	Yes	There will need to be changes to our Systems under roles as Supplier and NHHDC, however these changes will be minimal and will just feed into our P302 design.
Siemens Managed Services	Yes	Full Impact Assessment still to be done.
British Gas	Yes	We will have to review the process of sending flows on a disputed read to ensure we send D0300s to our supplier where we are the losing supplier.

Respondent	Response	Rationale
STARK	Yes	There will be some necessary system code changes and to working practices however this should have minimal impact.

Question 4: Will your organisation incur any costs in implementing CP1446?

Summary

Yes	No	Neutral/No Comment	Other
6	4	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No	-
Imserv Europe Ltd	Yes	One off system development costs to ensure systems process flows correctly (rough estimate 10 man days) and one off user training costs of 5 man days. Minimal ongoing extra costs as most of this flow processing is automated once developed.
TMA Data Management Ltd	Yes	CP1446 would impact systems and procedures with low one off costs, as P302 has not been implemented yet, the cost of CP1446 would be absorbed by the costs of P302 implementation.
SSE Energy Supply Limited	Yes	It will be incorporated into overall delivery of P302 and it has not been costed.
ScottishPower Energy Retail	Yes	As above, the change to process logic and to the flow population will incur costs. At present we are currently analysing these impacts, therefore at present we are unable to provide these costs.
E.ON Energy Solutions	Yes	It is not possible to definitively say at this time. We do not believe sufficient detail has been provided to consider this effectively.
EDF Energy	No	There will be no additional costs than those already identified under P302. The changes required will be made to objects that are already considered under P302 therefore we do not believe we would incur any additional design, implementation or testing costs as a result.
Siemens Managed Services	Yes	It is not possible for us to quantify costs at this stage.
British Gas	No	-
STARK	No	-

Question 5: Do you agree with the proposed implementation approach for CP1446?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	Has to go in at same time as all other P302 changes
TMA Data Management Ltd	Yes	If accepted, CP1446 should be implemented at the same time as P302 as it affects part of the P302 solution.
SSE Energy Supply Limited	Yes	The solution does need to align with P302.
ScottishPower Energy Retail	Yes	We agree that these changes should be implemented alongside P302.
E.ON Energy Solutions	No	No. We also note that for the similar gas change that debates are still continuing as to how best these issues can be progressed.
EDF Energy	Yes	The solution should align to the P302 implementation date to ensure the full end-to-end Smart CoS Reading process can be in place for DCC go live.
Siemens Managed Services	Yes	This CP needs to be considered as part of the wider changes under P302.
British Gas	No	We feel that further considerations need to be made which are outlined in question 6.
STARK	Yes	We agree that this is the logical approach as all related system changes can be deployed simultaneously, streamlining the process & minimising the overall impact.

Question 6: Do you have any further comments on CP1446?

Summary

Yes	No
2	8

Responses

Respondent	Response	Comments
Western Power Distribution	No	-
Imserv Europe Ltd	No	-
TMA Data Management Ltd	No	-
SSE Energy Supply Limited	No	-
ScottishPower Energy Retail	No	-
E.ON Energy Solutions	No	-
EDF Energy	No	-
Siemens Managed Services	Yes	<p>We have concerns around two agents both providing Cos reads independently of each other, we assume this is to facilitate tariff changes on SSD where the closing read for old supplier and opening read for new supplier could be different.</p> <p>In the situation where existing SMETS1 (foundation) meters are also in the DCC how will the old NHHDC know that the mpan is serviced by the DCC on CoS? Will they be notified mid appointment with a D0155 if their appointment predates the DCC? They will need to be notified somehow to allow them to follow the correct procedure on loss.</p>
British Gas	Yes	<p>Whilst we agree with the change for the specific issues noted we feel that there are areas and risks not considered. Before a solution is agreed upon we feel it would be beneficial for further clarification on the following points:</p> <ul style="list-style-type: none"> Supplier hubs acting independently will reduce the natural settlement controls when a TPR / SSC combination doesn't change on CoS. This change could increase the chances of different D0086s being used when there is no need for

Respondent	Response	Comments
		<p>that which will impact on the validity of settlement and customer billing. This could create overlaps and gaps in consumption which would be impossible to detect. Further discussion and exploration of controls on this is needed.</p> <ul style="list-style-type: none"> • Further clarification on how the accuracy of settlement will be maintained with different D0086s should also be considered, both on meters with new SSCs and TPRs and unchanged ones. • We feel a more robust change is required to strike a balance between controls on the current process and allowing suppliers to act independently when different D0086s are required and the process for ensuring accurate settlement data.
STARK	No	-

BSCP504

Respondent	Location	Comment
ScottishPower Energy Retail	3.2.6.44	Not clear when 1WD window starts; SSD, midnight reads, reconfiguration reads. This needs clarifying
ScottishPower Energy Retail	3.2.6.45	This does not exist in the redlining document. 3.2.6.46 is being done by the old NHHDC but according to all previous steps, they've not yet been given any reads, so appears to be a step missing.
ScottishPower Energy Retail	3.2.6.58	Should specify the approach should reads be available within 5 days before or after COS date, Would the process therefore be to issue Actual reads for COS date?