

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



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About This Document

The purpose of this CP1446 Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1446. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1446.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach.
- Attachment A contains the CP1446 Proposal Form.
- Attachment B contains the proposed redlined changes to deliver the CP1446 solution.
- Attachment C contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.

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.
- If the flow is valid, 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 considers a data flow to be invalid 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, a replacement reading will not always be able to be produced for all relevant parties.

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.



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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As a result the D0086 data flow 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.

Proposed solution

CP1446 'Allow smart CoS agreed Disputed Reads to be entered into Settlement' was raised by EDF Energy. 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 is valid, the NHHDC(s) will send a D0086 data flow to their Supplier and the LDSO. If the D0300 flow is invalid, the NHHDC will inform their Supplier, who will need to send a revised D0300 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 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.

Alongside this, CP1446 will also make a housekeeping amendment in response to a comment made by the Authority in its [P302 Decision Letter](#). The Authority considered that the changes 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 B contains the proposed changes to BSCP504 to deliver CP1446.

CP Consultation Questions
Do you agree with the CP1446 proposed solution? <i>Please provide your rationale.</i>
Do you agree that the draft redlining delivers the CP1446 proposed solution? <i>If 'No', please provide your rationale.</i>
We invite you to give your views using the response form in Attachment C

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. MAP CP 0255 has been raised to progress these changes in parallel with CP1446.

BSC Party & Party Agent impacts and costs

CP1446 is expected to impact Suppliers and NHHDCs, who may need to amend any processes being put in place for P302 to accommodate this change. As part of this CP Consultation, we seek to clarify the extent of the impact and any associated costs required to implement CP1446 above those already incurred under P302.

No other BSC Parties or Party Agents are expected to be impacted.

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

CP Consultation Questions

Will CP1446 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1446 and the CP1446 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1446?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment C

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4 Implementation Approach

Recommended Implementation Date

The Proposer requests that CP1446 is implemented 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.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1446?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

5 Initial Committee Views

SVG's initial views

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

Appendix 1: 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
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>)
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
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
D0300	Disputed Readings or Missing Readings on Change of Supplier

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/