

# CP Assessment Report

## CP1447 'Amendment to the timescales for sending the D0010 from Supplier to NHHDC on a Smart Change of Supply event'

**ELEXON**



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### Committee

Supplier Volume Allocation Group

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### Recommendation

Approve

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### Implementation Date

30 June 2016 (June 2016 Release)



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## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1447 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 CP1447.

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 CP1447 solution.
- Attachment B contains the full responses received to the CP Consultation.

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## Interactions with P302

[P302 'Improve the Change of Supplier Meter read and Settlement process for smart Meters'](#) will introduce a new change of Supplier (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.

## What is the issue?

As part of P302, [BSC Procedure \(BSCP\) 504](#)<sup>1</sup> process steps have been created which detail the need for the new Supplier to send a [D0010](#)<sup>2</sup> data flow to the new Non Half Hourly (NHH) Data Collector (DC) and old Supplier one Working Day (WD) after Meter reconfiguration. At this point in the new process the new Supplier will not have received the Meter Serial Number (MSN) from the new NHH Meter Operator Agent (MOA). It will therefore need to find the MSN from another source (such as the old Supplier) or use a dummy MSN to populate the D0010 data flow as the MSN is a mandatory field.

It was originally anticipated that the MSN would have been available to the new Supplier from the DCC. However, this is not the case. Although a change is anticipated in the future, there is currently no certainty on when this will be.

Sending a D0010 data flow to the NHHDC with the population of MSN from another source puts the processing of the D0010 data flow at risk. This is because this may not match the MSN on the [D0149](#)<sup>3</sup>/[D0150](#)<sup>4</sup> data flows the NHHDC will receive. It could also cause a delay in the creation of the CoS read on the [D0086](#)<sup>5</sup> data flow. This risk is also present for the old Supplier. If the MSN received in the D0010 data flow does not match the MSN held by the old Supplier, it may not be able to process the D0010 data flow or use it to bill the customer.

## 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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<sup>1</sup> BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'

<sup>2</sup> D0010 'Meter Readings'

<sup>3</sup> D0149 'Notification of Mapping Details'

<sup>4</sup> D0150 'Non Half-hourly Meter Technical Details'

<sup>5</sup> D0086 'Notification of Change of Supplier Readings'

### Proposed solution

RWE npower raised [CP1447 'Amendment to the timescales for sending the D0010 from Supplier to NHHDC on a Smart Change of Supply event'](#) on 4 September 2015. CP1447 makes a limited change to the solution approved under Modification P302 by amending the timescale for sending the D0010 data flow (detailed in step 3.2.6.44 of BSCP504) from **one** WD to **three** WDs.

The new Supplier also needs to include the MSN in the [D0367<sup>6</sup>](#) data flow. However, this CP will not progress changes to cater for this data flow to be populated with an MSN from a source other than the D0149/D0150 data flows, a dummy MSN or a change to make this field non mandatory. Such changes will be progressed either bilaterally by Suppliers and their agents or through the [Master Registration Agreement \(MRA\)](#) change process.

CP1447 also captures the Housekeeping changes requested by the Authority in its decision to approve P302. Namely the instantaneous readings taken by the new Supplier and passed to the old Supplier should be used by both Suppliers as the CoS reading, subject to validation by each NHHDC. These have also been captured under [CP1446 'Allow smart CoS agreed Disputed Reads to be entered into Settlement'](#).

### Proposer's rationale

The Proposer contends that this change will enable the Meter readings to be sent with the MSN installed on site that is contained in the D0149/D0150 data flows. At this point the D0149/D0150 should have been received, or sent on straight away if received from another source. This makes the process more flexible so that it can function prior to the anticipated DCC change.

### Proposed redlining

Attachment A contains the proposed redlined changes to BSCP504 to deliver CP1447.

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<sup>6</sup> D0367 'Smart Meter Configuration Details'

## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

CP1447 will require changes to BSCP504 to implement the proposed solution. No system changes are required, and there will be no impact on BSC Agents.

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

#### Central costs

The central implementation costs for CP1447 will be approximately £240 (one ELEXON man day) for ELEXON to implement the relevant document changes.

### BSC Party & Party Agent impacts and costs

We expect CP1447 to impact Suppliers and NHHDCs, who may need to amend any processes being put in place for P302 to accommodate this change. No other BSC Parties or Party Agents are expected to be impacted. As part of the CP Consultation, we sought confirmation of the extent of the impact and any associated costs required to implement CP1447 above those already incurred under P302. See comment in Section 6.

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

Eight of the 10 respondents indicated an impact. This would be either minor or no additional effort than already considered under P302. However, one (E.ON) indicated that this will introduce delays, which could increase exceptions.

Three respondents indicated that there would be implementation costs for CP1447. One of these respondents indicated that it had not assessed the impacts. Another stated that the costs would be absorbed into the P302 implementation effort, as detailed by other respondents that indicated no costs. E.ON indicated considerable costs if there are increased exceptions; however, ELEXON do not believe that there will be an increase in exceptions by extending the timescales.

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## 4 Implementation Approach

### Recommended Implementation Date

CP1447 is proposed for implementation on **30 June 2016** as part of the June 2016 BSC Systems Release.

The Proposer notes that P302 has been approved for implementation in the June 2016 Release. CP1447 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.

### Comments on the implementation approach

Seven out of 10 respondents supported the implementation approach of aligning with P302, with one respondent making no comment. Two respondents disagreed with the Implementation Date, which were the same two respondents that did not support the overall proposal.

## 5 Initial Committee Views

### SVG's initial views

Anticipating that CP1447 was due to be raised, the SVG considered it at its meeting on 1 September 2015 ([SVG175](#)). 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 CP1447 Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1447 proposed solution?	8	2	0	0
Do you agree that the draft redlining delivers the intent of CP1447?	5	3	1	1
Will CP1447 impact your organisation?	8	2	0	0
Will your organisation incur any costs in implementing CP1447?	3	7	0	0
Do you agree with the proposed implementation approach for CP1447?	7	2	1	0
Do you have any further comments on CP1447?	3	7	0	0

### Comments on CP1447 proposed solution

Eight out of 10 respondents to the CP Consultation supported CP1447. Respondents' views of the proposed solution are in line with the Proposer's. The views against are summarised below, along with ELEXON's views in response.

#### Old Supplier D0010 as source for MSN

British Gas didn't think CP1447 was necessary as the new Supplier will receive a D0010 data flow from the old Supplier, which will contain the MSN. Where the old Supplier has been able to provide the new Supplier with its reading, then the new Supplier will be able to pass on its reading to its NHHDC and the old Supplier. This could potentially be done sooner than the revised timescales. However, there are issues with reliance on this approach and not implementing CP1447.

Firstly, this places reliance on the old Supplier. As part of the intent of P302 is to reduce dependencies, this reliance would be contrary to that intent.

Moreover, the approved P302 BSCP504 text caters for the potential that the old Supplier hasn't been able to retrieve its read at Supply Start Date (SSD), or at all. As such, BSCP504 3.2.6.41 sets out that the old Supplier's read should be provided (where it has been able to retrieve it) to the new Supplier 'Within 1WD of 3.2.6.40 [where the old Supplier retrieves and checks the SSD midnight register reading(s)] and by SSD+3WD'. This could mean that the old Supplier hasn't been able to provide the new Supplier with its reading until three days after the new Supplier was able to retrieve its read, thereby delaying the new Supplier from sending on its reading to its NHHDC. And where the old Supplier hasn't been able to retrieve a reading, this would force the new Supplier to use the legacy processes, when this could have been avoided.

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## Need to address root cause

E.ON is sympathetic, but does not believe that extending timescales will address the issue. Its view is that the root cause should be addressed. ELEXON notes that a solution under the DCC is being considered that would address the root cause, but that this is not expected to be implemented until a later date. Therefore, not implementing CP1447 could undermine P302 by risking the timely use of the new Supplier's read for CoS and billing.

## Views on the proposed redlining

Five of the 10 respondents agreed with the proposed redlining. Another was supportive but not of including the Housekeeping changes in CP1447. One respondent didn't comment. Three respondents were unsupportive of the proposed redlining, with their views on this summarised below.

One of the three respondents that disagreed with the legal text sought clarity for when the three WD window starts. ELEXON believes that it is sufficiently clear that the window starts from when the new Supplier takes its reconfiguration reading in BSCP504 3.2.6.42.

The other respondents were the same ones that disagreed with the CP. British Gas do not believe that the change is required, as set out above. E.ON is concerned that this will create delays in the process, which is contrary to the faster switching initiative that P302 supports and the subsequent effects of this. ELEXON do not believe that this will cause a delay as there is still the trigger for when the legacy process kicks in. In addition, this is only an interim solution until a DCC solution is implemented.

## Comments on redlining

We received three comments on the proposed redlining. However, other than addressing the footnote errors in Attachment A, ELEXON does not propose to amend the redlining further.

Comments on the CP1447 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
3.2.6.44	Not clear when 3WD window starts; SSD, midnight reads, reconfiguration reads.	<p>3.2.6.44 'WHEN' states "If the new Supplier has been able to obtain a reading(s) under 3.2.6.42 and within 3 WD of 3.2.6.42."</p> <p>3.2.6.42 'WHEN' states: "From SSD<sup>25, 26</sup>"</p> <p>Footnote 26 states: "The SSD midnight register reading(s) and instantaneous readings are taken at the point of configuration (whether or not there is a change of SSC)."</p> <p>Therefore, the 3WD window starts from when the new Supplier takes</p>

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Comments on the CP1447 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
		its reconfiguration reading in 3.2.6.42.
3.2.6.XX	No change detailed for when new proposed reads are not agreed to by the other supplier.	This is covered by the MRA Agreed Procedure 08 process and outside the scope of this change to address.
3.2.6.57	Bookmark not defined errors on footnotes.	This has been addressed in Attachment A.

## Additional comments

We received three additional comments, which are detailed in Attachment B. One of these asked whether the expected timescales have an impact on the old Supplier sending the [D0300<sup>7</sup>](#) data flow. ELEXON clarified that CP1447 does not make amendments to this process, nor should the revised timescales impact on this.

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<sup>7</sup> D0300 'Disputed Readings or Missing Readings on Change of Supplier'.



## 7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP504 for CP1447; and
- **APPROVE** CP1447 for implementation on 30 June 2016 as part of the June 2016 Release.

## 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
CPC	Change Proposal Circular
DCC	Data and Communications Company
MRA	Master Registration Agreement ( <i>industry Code</i> )
MSN	Meter Serial Number
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector ( <i>Party Agent</i> )
SMETS	Smart Metering Equipment Technical Specifications
SSD	Supply Start Date
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )
WD	Working Day

### 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
D0010	Meter Readings
D0086	Notification of Change of Supplier Readings
D0149	Notification of Mapping Details
D0150	Non Half-hourly Meter Technical Details
D0300	Disputed Readings or Missing Readings on Change of Supplier
D0367	Smart Meter Configuration Details

### 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.

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External Links		
Page(s)	Description	URL
2	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
2	P302 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p302/">https://www.elexon.co.uk/mod-proposal/p302/</a>
2	MRA Service Company website	<a href="http://www.mrasco.com/">http://www.mrasco.com/</a>
2	D0010 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0010&amp;FlowVers=2&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0010&amp;FlowVers=2&amp;searchMockFlows=False</a>
2	D0086 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0086&amp;FlowVers=2&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0086&amp;FlowVers=2&amp;searchMockFlows=False</a>
2	D0149 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0149&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0149&amp;FlowVers=1&amp;searchMockFlows=False</a>
2	D0150 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0150&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0150&amp;FlowVers=1&amp;searchMockFlows=False</a>
2	D0367 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0367&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0367&amp;FlowVers=1&amp;searchMockFlows=False</a>
3	CP1447 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1447/">https://www.elexon.co.uk/change-proposal/cp1447/</a>
3	CP1446 page on the ELEXON website	<a href="https://www.elexon.co.uk/change-proposal/cp1446/">https://www.elexon.co.uk/change-proposal/cp1446/</a>
5	SVG175 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-175/">https://www.elexon.co.uk/meeting/svg-175/</a>
8	D0300 entry in the Data Transfer Catalogue	<a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0300&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0300&amp;FlowVers=1&amp;searchMockFlows=False</a>

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