

CP Consultation Responses

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



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
ScottishPower Energy Retail	2/0	Supplier
Western Power Distribution	4/0	Distributor
Imserv Europe Ltd	0/6	Supplier Agent: Half Hourly (HH) data Aggregator (HHDA), HH Data Collector (HHDC), HH Meter Operator Agent (HHMOA), Non Half Hourly (NHH) DA, NHHDC, NHHMOA
TMA Data Management Ltd	0/4	Supplier Agent: HHDA, HHDC, NHHDA, NHHDC
SSE Energy Supply Limited	4/0	Supplier
E.ON Energy Solutions	5/0	Supplier
Siemens Managed Services	0/2	NHHDC
EDF Energy	10/12	Generator, Supplier, Non Physical Trader, Consolidator, Central Volume Allocation (CVA) MOA, HHMOA, NHHMOA, NHHDA, NHHDC
British Gas	5/0	Supplier
STARK	4/0	Supplier Agent: HHDA, HHDC, NHHDA, NHHDC

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Summary of Consultation Responses

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

Question 1: Do you agree with the CP1447 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
ScottishPower Energy Retail	Yes	The SLA of 3 days would be a more realistic timescale to allow for the D0010 flow to be issued. We feel this timescale would allow suppliers more opportunity to obtain and send the reading than the current 1 day window.
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	Yes, we agree; we would not support the use of dummy MTDs in a D0010 if the Supplier did not have the Meter serial number by SSD+1. We are disappointed that the DCC cannot deliver the Meter serial number as previously thought.
SSE Energy Supply Limited	Yes	This is a pragmatic and minor amendment to the P302 solution to support accurate metering data being managed at CoS. An extension of sending the D0010 from 1 to 3 working days is practical period; we do not foresee any unintended consequences of making this slight deviation from the agreed P302 solution.
E.ON Energy Solutions	No	Whilst we are sympathetic to the proposal, experience to date shows that if flows are not received at the agreed time, simply extending the timescale does not of itself necessarily deliver an improved solution. The solution therefore does not seem to address the root cause issue.
Siemens Managed Services	Yes	Will impact us as a NHHDC. Agree with this change on the basis that it should reduce the number of exceptions resulting from this process.
EDF Energy	Yes	The change will allow the new Supplier to obtain and validate the Meter Serial Number from an alternative source prior to it being available in DCC. Also the timescales proposed will still enable the Old Supplier to receive the D0010 candidate reading in a timely manner.

Respondent	Response	Rationale
British Gas	No	-
STARK	Yes	Logical change to allow time for all correct information to be received as these discrepancies would only cause the delays.

Question 2: Do you agree that the draft redlining delivers the CP1447 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	3	1	1

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
ScottishPower Energy Retail	No	3.2.6.44 - Not clear when 3WD window starts; SSD, midnight reads, reconfiguration reads.
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	-
SSE Energy Supply Limited	Other	We note the redlining includes the 'instantaneous' reference (3.2.6.44) detailed within the proposed solution for CP1446. Though we are supportive of this change, it hasn't been proposed under CP1447 and so it should not be part of the red-lining solution for CP1447. Otherwise, the redlining appropriately delivers the CP1447 solution.
E.ON Energy Solutions	No	We are concerned that having to wait for additional data items is not in keeping with wider industry initiatives to introduce faster switching making this easier and simpler for consumers. By introducing delays we risk introducing uncertainty for customers which in turn may reduce trust in the overall process and reduce engagement.
Siemens Managed Services	No comment	-
EDF Energy	Yes	-
British Gas	No	We do not believe this change is required.
STARK	Yes	-

Question 3: Will CP1447 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
ScottishPower Energy Retail	Yes	The proposal will change the timescales that our core systems will adhere to when issuing the D0010 flow.
Western Power Distribution	No	-
Imserv Europe Ltd	Yes	NHHDC - small amendment to system processes and training
TMA Data Management Ltd	Yes	Systems and procedures would be affected by CP1447.
SSE Energy Supply Limited	Yes	It will not have a material impact on the P302 project delivery.
E.ON Energy Solutions	Yes	The proposal introduces delays which could increase rather than decrease exceptions.
Siemens Managed Services	Yes	-
EDF Energy	Yes	There will be no on impact in terms of systems or processing. A minor amendment to monitoring arrangements will be required due to the change in timescales.
British Gas	No	-
STARK	Yes	Minimal procedural change.

Question 4: Will your organisation incur any costs in implementing CP1447?

Summary

Yes	No	Neutral/No Comment	Other
3	7	0	0

Responses

Respondent	Response	Rationale
ScottishPower Energy Retail	No	-
Western Power Distribution	No	-
Imserv Europe Ltd	No	-
TMA Data Management Ltd	Yes	As CP1447 modifies aspects of P302 which has not yet been implemented, the CP1447 cost would be absorbed by the P302 cost.
SSE Energy Supply Limited	No	It will not have a material impact on the P302 project delivery costs.
E.ON Energy Solutions	Yes	These could be considerable if increased exceptions result.
Siemens Managed Services	Yes	Not possible to quantify costs at this stage. We will need to undertake a full Impact Assessment
EDF Energy	No	There will be no additional costs than those already identified under P302.
British Gas	No	-
STARK	No	-

Question 5: Do you agree with the proposed implementation approach for CP1447?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	0

Responses

Respondent	Response	Rationale
ScottishPower Energy Retail	Yes	We agree that this change should be implemented along with P302.
Western Power Distribution	Yes	-
Imserv Europe Ltd	Yes	-
TMA Data Management Ltd	Yes	If accepted, CP1447 must be implemented at the same time as P302.
SSE Energy Supply Limited	Yes	This change must align with P302 implementation.
E.ON Energy Solutions	No	No. we are concerned that industry risks implementing a sub optimal change, which may add further cost which may otherwise have been avoided.
Siemens Managed Services	No comment	-
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 used for DCC go live.
British Gas	No	-
STARK	Yes	Will minimise overall impact if all the related changes are simultaneous.

Question 6: Do you have any further comments on CP1447?

Summary

Yes	No
3	7

Responses

Respondent	Response	Comments
ScottishPower Energy Retail	No	-
Western Power Distribution	No	-
Imserv Europe Ltd	No	-
TMA Data Management Ltd	No	-
SSE Energy Supply Limited	No	-
E.ON Energy Solutions	No	-
Siemens Managed Services	Yes	This CP needs to be considered as part of the wider changes under P302.
EDF Energy	No	-
British Gas	Yes	British Gas does not believe there is a need to make this change. The justification for the change is to ensure the MSN is included in the outbound D0010 in step 3.2.6.44. However on review of step 3.2.6.41, the new supplier will receive a D0010 from the old supplier which will contain the MSN. Therefore the change is unnecessary.
STARK	Yes	Does this then affect the expected timescale for the old Supplier to send the D0300 to initiate the missing reads process?; what timescale will the old NHHDC use for a missing read and any escalation process.

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Respondent	Location	Comment
ScottishPower Energy Retail	3.2.6.44	Not clear when 3WD window starts; SSD, midnight reads, reconfiguration reads.
ScottishPower Energy Retail	3.2.6.XX	No change detailed for when new proposed reads are not agreed to by the other supplier.
Imserv Europe Ltd	3.2.6.57	Bookmark not defined errors on footnotes.