CP Assessment Report

CP1455 'Sending revised Meter Technical Details following a change of Meter Operator Agent'

Committee

Supplier Volume Allocation Group

Recommendation

Reject

Implementation Date

23 February 2017
(February 2017 Release)

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1455 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 5 July 2016. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1455.

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 CP1455 solution.
- Attachment B contains the full responses received to the CP Consultation.

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1 Why Change?

What are Meter Technical Details?

Meter Technical Details (MTDs) are sets of data relating to the Metering Equipment installed at each customer premises. Each set contains all the technical details needed to enable metered data to be collected and correctly interpreted from a particular Metering System. MTDs are maintained by the Meter Operator Agent (MOA) appointed to the Metering System. MTDs for Non Half Hourly (NHH) or Half Hourly (HH) Metering Systems are distributed by the relevant MOA to the relevant Supplier, Data Collector (DC) and Distribution System Operator (DSO).

What is the issue?

CP1162 'Sending revised Meter Technical Details during a change of Meter Operator Agent' was implemented in June 2007. This introduced into Balancing and Settlement Code Procedure (BSCP) 514 'SVA Meter Operations for Metering Systems Registered in SMRS' a new requirement within the two procedures covering the sending of MTDs on a change of MOA (with and without change of Supplier).

"Where the current Meter Operator Agent (MOA) has been instructed to send Meter Technical Details (MTDs) to a new MOA, and there is a change to MTDs, the current MOA should send the revised MTDs to the new MOA until such a time as the current MOA is no longer responsible for the MTDs".

In December 2014, the Electricity Data Quality Working Group (DQWG – a joint ELEXON and Master Registration Agreement (MRA) initiative) identified an issue of 'Missed Meter Exchanges' in its report. It noted that this issue can occur when a routine Meter exchange takes place close to the change of MOA date.

The DQWG noted that the requirement introduced by CP1162 does not explicitly address scenarios in the NHH market where the old MOA:

- has not sent the revised MTDs by the de-appointment date
- (unknowingly) carries out the Meter exchange after the de-appointment date; or
- becomes aware that a Meter exchange had been carried out, but did not update its metering records prior to de-appointment.

The Group believed that the requirement in BSCP514 would benefit from being extended to include these situations.

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2 Solution

Proposed solution

CP1455 'Sending revised Meter Technical Details following a change of Meter Operator Agent' was raised by ELEXON on 14 January 2016.

The intention of CP1455 is to clarify the requirement that, any Meter exchange carried out by the old NHHMOA after the MTDs have been sent to the new NHHMOA should result in a revised set of MTDs, notwithstanding the NHHDC's de-appointment date. It proposes to do this by enhancing the requirement in BSCP514 footnote 30 to state that the current MOA needs to send the revised MTDs to the new MOA when it carries out a Meter exchange after the transfer of the original MTDs.

CP1455 and CP1465

The intended scope of CP1455 was to cater for specific NHH scenarios only. However we now recognise that, by amending footnote 30, CP1455 inadvertently applies its solution to the HH market and to other NHH scenarios. This is because footnote 30 appears in multiple NHH and HH BSCP514 processes and our proposed redlining referred generically to 'MOAs' to match the existing footnote wording introduced by CP1162. This unintended effect became apparent after a consultation respondent highlighted an impact on them as an HHMOA, and during further discussion between ELEXON and respondents.

On 13 June 2016, ELEXON therefore raised CP1465 'Sending revised MTDs following a change of NHHMOA'. This CP proposes to add the enhanced requirement to only the relevant NHH processes and addresses the issues identified in the CP1455 Consultation.

CP1455 and CP1465 are mutually exclusive. We recommend that the SVG therefore rejects CP1455 on the basis that we are progressing CP1465. If both were approved, then there would be a conflict in the redlining.

We held back this CP1455 decision paper until we were confident that CP1465 addresses the concerns and so that we could bring the CP1465 New CP Progression Paper to the same SVG meeting. This enables the SVG to reject CP1455 having sight of CP1465.

For more information on CP1465, please see separate SVG paper 185/04.

Proposer's rationale

This change was originally identified by the EDQWG in its 2014 report. It recommended that ELEXON should raise a CP to sharpen the requirement to transfer revised MTDs, when a Meter exchange is carried out after the old MOA has transferred the MTDs to the new MOA. We therefore raised CP1455 (and have since raised CP1465) to progress this recommendation.

Proposed redlining

Attachment A contains the proposed changes to BSCP514 to deliver CP1455.

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3 Impacts and Costs

Central impacts and costs

CP1455 will require changes to BSCP514. No changes to BSC Systems are required and there will be no impact on BSC Agents.

The central implementation costs for CP1455 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
• BSCP514	*None*

BSC Party & Party Agent impacts and costs

Participant impacts

CP1455 is expected to have minor process impacts on HHMOAs and NHHMOAs. No system changes were originally expected. However, one respondent noted that system changes will be required and another expected that new reports would be required to support the change.

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

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHMOAs	Changes will be required to implement the solution.
NHHMOAs	

Three of the seven respondents to the CP Consultation indicated that they would be impacted by CP1455. One respondent commented that, as an MOA, they would need to ensure that they transfer accurate HH MTDs to the new MOA even if they have been de-appointed from the Metering System. Another respondent commented that system changes will be required to enable the MOA to generate a new set of MTDs outside of its appointment period. ELEXON highlighted that no system changes should be required as a result of CP1455. The intention is only to extend the responsibility of the outgoing MOA for sending updated MTDs for any changes that it carries out, even if that entails sending them outside their appointment period.

The other respondent who indicated an impact commented that as the outgoing MOA, reports will need to be created to support enduring compliance with this process. As the new MOA they would need to be prepared to accept revised metering information from the outgoing MOA. They noted that their supply function would also be impacted as there may be an increase in the number of revised Meter records being received.

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Participant costs

Two of the seven respondents to the CP Consultation indicated that they would incur costs associated with implementing CP1455. One respondent commented that the main costs would be to their MOA function in developing reports. However, they considered that this would be a one-off cost. In addition, they highlighted that minor business process changes would also be required by both MOA and supply functions. The other respondent commented that costs would be incurred by the system changes that they would need to undertake, although the costs of this is to be confirmed.

Another respondent commented that the full cost estimates for implementing CP1455 are not yet known. The remaining four respondents did not indicate that there would be any costs associated with implementing CP1455.

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4 Implementation Approach

Recommended Implementation Date

At the time of the consultation in February 2016, CP1455 was proposed for implementation on **30 June 2016** as part of the June 2016 BSC Systems Release. This Implementation Date is obviously no longer achievable.

Five of the seven respondents to the CP Consultation agreed with this proposed Implementation Date. The remaining two respondents did not agree. They commented that, in view of the system changes required, a minimum of six months would be needed to ensure that there is sufficient time for system implementation and testing. One of the respondents noted that as the CP is not time-critical, they would instead support implementation in the November 2016 BSC Release.

Considering that one respondent has indicated system changes would be required, should the SVG approve CP1455 we would recommend an Implementation Date of **23 February 2017** as part of the February 2017 BSC Release. However, in response to the other concerns raised during the consultation phase, we recommend that the SVG rejects CP1455 noting that we have raised CP1465 to progress a revised approach.

5 Initial Committee Views

SVG's initial views

The SVG considered CP1455 at its meeting on 2 February 2016 (SVG180/07).

An SVG Member queried whether the change required any system changes for participants. We confirmed our initial view that that the CP did not require participants to amend their systems as the MTDs could be sent via an email method.

An SVG Member was concerned that if the SVG approved CP1455 at its 5 April 2016 meeting, it would not give Parties a lot of time to amend their systems. We advised that, depending on responses received to the CP Consultation, the SVG could amend the Implementation Date if it felt that further time was required for Parties to implement the changes.

The SVG did not ask for any additional questions to be added to the CP Consultation.

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6 Industry Views

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

Summary of CP1455 CP Consultation Responses			
Question	Yes	No	Other
Do you agree with the CP1455 proposed solution?	5	2	0
Do you agree that the draft redlining delivers the intent of CP1455?	6	1	0
Will CP1455 impact your organisation?	3	3	1
Will your organisation incur any costs in implementing CP1455?	2	4	1
Do you agree with the proposed implementation approach for CP1455?	5	2	0
Do you have any further comments on CP1455?	2	5	0

Comments on the CP

Five of the seven respondents to the CP Consultation agreed with the proposed changes for CP1455. One respondent commented that the proposal is a positive step towards closing a gap in the process that has led to Suppliers (and their agents) setting customers up with inaccurate MTDs.

This respondent believed that the incidence of these situations is relatively low, but considered that they often result in a degree of customer detriment (e.g. billing complaints and disruption caused by on-site inspections) and operational inefficiency, and that these are clear justifications for taking action.

The respondent also considered that the solution is straightforward and therefore they do not expect it will be onerous for MOAs to manage. Another respondent agreed with the proposed solution as it will enforce the need for MOAs to transfer accurate MTDs.

The remaining three respondents who agreed with the proposed changes did not provide any further comments.

Two of the seven respondents to the CP Consultation disagreed with CP1455, raising the three questions set out below in regard to the expected process.

How will the old MOA communicate to the new MOA about work that was undertaken after it was de-appointed?

One respondent that disagreed with CP1455 commented that, although CP1455 improves the current arrangements, it does not provide enough detail of how the old MOA will communicate to the new MOA about the work that was undertaken after it was de-appointed.

The respondent noted that normally, on a change of MOA, the installed MTDs are provided via the D0150 'Non Half-hourly Meter Technical Details' flow. This is done in group 290 'Meter/Retrieval Method Details' of the D0150, and nothing is provided in group 08A

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'Meters Removed'. However, if a Meter exchange had been carried out in the period post de-appointment, the new MOA would need group 08A 'Meters Removed' as well as the MTDs of the installed Meter. The respondent noted that without this information the new MOA cannot process the exchange and cannot advise other industry parties, including the Supplier. The respondent therefore believed that a clear and concise process should be included, not merely an expanded footnote.

ELEXON agrees that the BSCP does not specify whether the MTDs should contain details of both the new and removed Meters, or only the new Meter. However, this limitation applies to the existing footnote 30 in BSCP514, and to date we are not aware of this presenting a barrier to the transfer of MTDs in these scenarios. Our view is that "revised MTDs" as used in footnote 30 would include details of removed Meters in the event of a missed Meter exchange. In this regard, CP1455 is simply ensuring that the requirement is extended to cover activities carried out by the old MOA after their de-appointment date.

Does extending the obligation on MOAs beyond their period of appointment raise potential issues?

The other respondent who disagreed with CP1455 understood the logic for the change (to ensure current MTDs and information are as up to date as possible). However they considered that the extension of the obligation beyond the agent's period of appointment raised potential issues. They noted that the CP requires the current MOA to send the revised MTDs to the new MOA when it carries out a Meter exchange after the transfer of the original MTDs. The respondent was concerned that the proposed wording could be interpreted as an open-ended obligation to retain MTDs indefinitely for sites to which they were no longer appointed, whereas the current data retention period for MOAs is 40 months.

ELEXON notes that CP1455 is intended to address situations where MOAs carry out meter exchanges that were scheduled prior to notification of de-appointment. There is a small risk that they carry out the scheduled replacement before realising that they have been de-appointed, and thereafter can no longer send the new MTDs. However, these Meter exchanges should be a matter of a few days after their formal de-appointment date, rather than MOAs carrying out Meter exchanges 40 months or more after de-appointment.

The same respondent also commented that there is a lack of clarity about the requirements on an MOA when they receive updated data from a previous MOA, and identified and queried three possible scenarios:

a) The current MOA has amended the MTDs and has received amended data effective prior to the date of change of agent.

b) An MOA receives an amendment from a previous MOA but is itself no longer the current MOA - what should the receiving MOA do?

c) Changes to the Supplier or DC appointments during the period impacted by the change of MTDs.

In response to scenario a), ELEXON notes it is unlikely that the new MOA will have made further changes before being notified of the Meter exchange by the old MOA a few days after de-appointment. However, if the new MOA's changes are the result of a site visit, the new MOA should discover immediately that the old MOA has exchanged the Meter.

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With respect to scenarios b) and c), ELEXON notes that the CP is aimed at Meter exchanges very soon after the de-appointment date. Therefore a further change of MOA, Supplier or DC is unlikely to happen within these timeframes.

Are MOAs still obliged to send the latest version of the MTDs they hold if a D0170 data flow is received by the MOA after the de-appointment date?

A respondent (who supported the CP and did not identify any implementation impact on them) asked for clarification. They asked if the old MOA is obliged to send the latest version of MTDs it holds if it receives a D0170 'Request for Metering System Related Details' data flow after its de-appointment date, where the latest version of the MTDs had already been issued prior to de-appointment and no subsequent changes are known. The respondent noted that the old MOA's MTDs may be out of date as it is possible that subsequent changes to the MTDs were made after the old MOA's de-appointment.

The respondent believed that no change to this process should result from CP1455, and that in this scenario as MOA it would not trigger any MTDs after its de-appointment.

ELEXON advised that if an MOA receives a request to send MTDs via a D0170 data flow that is in accordance with BSCP514, then the MOA should send the MTDs. If the new MOA has exchanged the Meter or made subsequent MTD changes, the Supplier and DC should have been notified. Therefore if the Supplier or new MOA request MTDs from the old MOA after a further change, it is doing so at its own risk. The MOA should act on the request made if it is valid. We note that it is for the requesting party to resolve any issues that this might cause.

Comments on the proposed redlining

Six of the seven respondents to the CP Consultation agreed that the BSCP514 draft redlined text delivers the intention of CP1455.

However, one respondent disagreed because they believed that the redlined text does not explicitly account for the various scenarios that it identified. These concerns and ELEXON's responses are set out in the sub-section above, 'Does extending the obligation on MOAs beyond their period of appointment raise potential issues?'

As set out above, ELEXON does not believe that any of the scenarios identified by the respondent lead to issues. However, ELEXON notes the respondent's concern and considers that the words 'or new evidence of an earlier change to MTD', which CP1455 proposed to add to footnote 30, appears to have exacerbated a misunderstanding that a new obligation is placed on MOAs after their de-appointment date.

ELEXON therefore recommends that, if the SVG approves CP1455, it removes this text from the redlining. This would not change the CP1455 solution but would remove a potential source of confusion. The amendment to remove this text is highlighted in green in Attachment A.

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ELEXON's recommendation

CP1455 aimed to address a specific NHH issue by amending footnote 30. However, a consequence of this approach is that all sections of BSCP514 referencing footnote 30 would be subject to the enhanced requirement. This includes HH instances that are outside the intended scope (e.g. BSCP514 section 5.2.1.8 'Change of HHMOA (No Change of Metering System or Change of Supplier')) or where the enhanced requirement is not applicable (e.g. BSCP514 section 6.3.3.5 'Removal of a Metering System (NHH)').

Respondents to the CP1455 consultation supported the intention of CP1455, although some noted the scope concerns raised by the drafting approach. Follow-up discussions with respondents and within ELEXON identified an alternative approach to the BSCP514 redlining that was clearer and more explicitly related to the change of NHHMOA process.

As such, we therefore recommend that the SVG rejects CP1455 on the basis that we will progress CP1465 which addresses respondents' concerns.

7 Recommendations

We invite you to:

- **REJECT** CP1455.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code *(industry Code)*
BSCP	Balancing and Settlement Code Procedure *(Code Subsidiary Document)*
CoS	Change of Supplier
CP	Change Proposal
CPC	Change Proposal Circular
DC	Data Collector *(Party Agent)*
DSO	Distribution System Operator *(BSC Party)*
HH	Half Hourly
MOA	Meter Operator Agent *(Party Agent)*
MRA	Master Registration Agreement *(industry Code)*
MTD	Meter Technical Details
NHH	Non Half Hourly
SVG	Supplier Volume Allocation Group *(Panel Committee)*

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
D0150	Non Half-hourly Meter Technical Details
D0170	Request for Metering System Related 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.

External Links		
Page(s)	Description	URL
2	CP1162 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1162-sending-revised-meter-technical-details-during-a-change-of-meter-operator-agent/
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/

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External Links		
Page(s)	Description	URL
2	Panel 231 page on the ELEXON website	https://www.elexon.co.uk/meeting/bsc-panel-231/
2	Electricity Data Quality Report on the MRASCO website	http://www.mrasco.com/admin/documents/Electricity%20Data%20Quality%20Working%20Group%20Report_v1.0.pdf
3	CP1455 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1455/
3	CP1465 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1465/
6	SVG 180 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-180/

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