

CP Consultation Responses



CP1469 'Changes to support the implementation of the SRAG's recommendations'

This CP Consultation was issued on 8 August 2016 as part of CPC00769, with responses invited by 2 September 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
Brookfield Utilities	1/0	Distributor
IMServ Europe	0/6	HHDC, HHDA, HHMOA, NHHDC, NNHDA, NHHMOA
Npower Group	3/0	Generator, Supplier, Non Physical Trader
OVO Energy	1/1	Supplier, Supplier Agent
Salient Systems Limited	0/2	HHDC, HHDA System Solutions Provider
ScottishPower	0/1	Supplier Agent (SMART Metering)
Siemens Managed Services	0/2	HHDA, HHDC
SP Distribution / SP Manweb	1/0	Distributor
SSE Energy Supply Limited	1/4	Supplier, NHHMOA, HHMOA, NHHDC, NHHDA
Stark Software International Ltd	0/4	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management Ltd	0/4	HHDC, HHDA, NHHDC, NHHDA
Western Power Distribution	1/0	Distributor

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CP Consultation Responses

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Version 1.0

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✗	✗	✓
Brookfield Utilities	✓	✓	-	✓
IMServ Europe	✓	✓	✓	✗
Npower Group	✓	✓	✓	✓
OVO Energy	✓	✗	✗	✓
Salient Systems Limited	✓	✓	✓	✓
ScottishPower	✓	✓	✓	✓
Siemens Managed Services	✓	✓	✓	✗
SP Distribution / SP Manweb	✓	✓	✓	✓
SSE Energy Supply Limited	-	✓	✓	-
Stark Software International Ltd	-	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓

Question 1: Do you agree with the CP1469 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	0	1	1

Responses

Respondent	Response	Rationale
British Gas	Yes	[None]
Brookfield Utilities	Yes	Brookfield support this change as feel it addresses the transferring of HH data through the appropriate data flow.
IMServ Europe	Yes	This will allow Profile Class 1 to 4 customers to trade half hourly.
Npower Group	Yes	<p>Npower agrees with CP1469's proposed solution in general. The CP proposes to implement the SRAG recommendations for the elective Half Hourly (HH) Settlement of DCC enrolled smart meters. The changes set out in this CP will introduce new processes for getting smart meter data from the supplier to the Half Hourly Data Collectors (HHDCs). The validation and estimation requirements are also further defined under this CP for smart meters.</p> <p>The solution therefore looks at improving the process for customers and also improving the accuracy of the data collected, which are changes that we support. As a result, in general, we agree with the proposed solution of this CP.</p>
OVO Energy	Yes	We believe that SRAG objectives are met by the proposed solution
Salient Systems Limited	Yes (with caveats)	<p>We recognise that CP1469, with its limited scope, must be complemented by further CP's that will address the wider implications of accommodating and managing all of the HH business processes between supplier hub participants that will be impacted by the imminent service and data deliveries of the new DCC role. Nevertheless, we fully support the objectives of this limited but contributing CP and are predominantly in agreement with proposed solutions.</p> <p>We would reluctantly support the introduction of new D0036, D0275 flow variants as options that may be used by Suppliers to communicate Smart refined precision consumption data to HHDC's and</p>

Respondent	Response	Rationale
		<p>that will be used to communicate the same from HHDC's to HHDA's and Suppliers. We do so only on the basis of avoiding reported significant impact arising at some distribution companies (CP1464 responses) if the original CP1464 proposal to increase the precision of consumption data reported at each of the existing D0003, D0036, D0275 flow data items was pursued. Supplier systems, HHDC/DA systems will still need to make the necessary changes to accommodate the refined precision requirement. Introduction of new flows, rather than persisting existing refined flows, will inflate rather than reduce change costs at those parties. HHDC's will not benefit from having to apply alternate precision policies to consumption data at subsets of their managed portfolios rather than applying a consistent policy across all of the portfolio, limited only by the precision available from meters.</p> <p>As a result of the introduction of precision policy variants the HHDC will benefit from further guidance upon when to apply the refined policy. At the proposed date for mobilisation of facilities to support elective HH settlement of domestic (MC F) Smart metering systems, supported by DCC consumption data deliveries, HHDC systems will already be supporting P272 NHH>HH migrated metering systems (MC G) with advanced meters in place, meters which predominantly will accommodate extended precision requirements. Elective HH settlement at NHH PC 3-4 metering systems where advanced meters may be in place is available now and will continue to be further encouraged by Ofgem alongside domestic moves to HH. Where PC 3-4 metering systems do not currently have a HH enabled advanced meter in place then replacement with a SMETS compliant meter and alignment with DCC support offerings will be the favoured, pragmatic approach. As a result, HHDC's will be managing a mix of MC G metering systems some of which receive consumption data from DCC via the Supplier and some of which will receive consumption data via HHDC AMR facilities, with different data precision policies applied to each set. While the materiality assessment of increased precision applied at MC G MS's will be different from that at MC F MS's it does seem a little perverse that different data precision policy is applied to MC G data depending upon its source, DCC or HHDC. Application of a consistent precision policy by MC</p>

Respondent	Response	Rationale
		<p>may be favoured without impacting LDSO's in the short term.</p> <p>We would also suggest that Suppliers should send regular D0010's to HHDC, perhaps replacing the proposed send of D0010 to LDSO since HHDC already sends D0010 to LDSO for MC F, G MS's (P300), so this could be a pass-through exercise actioned by the HHDC. We believe that in order to exercise HHDC validation and data estimation requirements against DCC, SMSO sourced consumption data then register consumption advance data will be required at HHDC – please see Q2 responses below.</p>
ScottishPower	Yes	We support the change on the basis that this change is by nature elective and will not obligate us to settle HH for SMART Meters.
Siemens Managed Services	Yes	We agree that that the precision of consumption data needs to increase with the introduction of Measurement Classes, E, F & G into HH Settlement with their smaller values. Currently Settlement could be inaccurate due to the truncation or rounding of data from Measurement Classes, E, F & G metering systems.
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Neutral	<p>Our response to this proposal is based on an assessment of the associated flow change (DTC CP 3496) and takes into account the broader suite of Elective HHS work.</p> <p>In principle we accept CP1469 is adequate for managing the flow of HH consumption data. The one problematic area specifically concerns the amendment to the J0098 'Retrieval Method' (see also DTC CP 3496). The change will impact our systems because they are set up to require a level of validation that will need to be implemented even if we do not expect to send or receive the information. Though this change is low impact we are viewing it in the wider context of Elective HHS code changes as well as in the broader landscape of mandatory existing programmes which are heavily impacting our systems concurrently.</p> <p>We would also see enormous benefits in reviewing the end-to-end Elective HHS process and the impacts on all parties in all scenarios. We do not believe this would be an onerous task. It would</p>

Respondent	Response	Rationale
		<p>bring a great deal more confidence that all aspects of the process have been considered and the proposals are fit for purpose. Maintaining the integrity of settlements and the quality of the customer journey are too significant to avoid diligently reviewing and recording that the process is robust and no gaps or unintended consequences will arise. SSE would be actively engaged and supportive in such a process. Some relevant areas for review may include:-</p> <p>(1) Substantiating that BSC allows for profile data to be used for Settlements and an assessment of any DCC / DUIS / GBCS impacts. It is our view that HH profile data was never designed for billing purposes so the way the device operates, with all the settings, configurations, event and alarms, do not factor it being done in this way.</p> <p>(2) Further consideration of dual element meters, including but not limited to, the view that dynamically switched meters for smart may only be able to be settled HH.</p> <p>(3) the focus of discussion appears to have been DCC-enrolled meters, however there is a significant number of non-DCC enrolled SMETS meters for the coming years.</p> <p>(4) Full end-to-end walkthrough.</p> <p>We are mindful of the Ofgem driver for the mechanism to be ready for June 2017, we are therefore keen to ensure that the process can be implemented and used.</p> <p>We recognise SRAG undertook a high-level approach to Elective HHS; however this was based on a narrow scope and, understandably for that stage of development, did not deal with the detail of the process. Overall, this means that while we agree that this solution appears to be suitable we cannot assess the full impacts of Elective HHS till all proposals have been raised.</p>
Stark Software International Ltd	Partial agreement	<p>Seems to be over-prescribed and fails to recognise a possible direct HHDC/DCC interface. See later.</p> <p>Agreed:</p> <ul style="list-style-type: none"> Change to data precision (but suggest that all D0275/D0036 be modified to allow for this rather than create new flows)

Respondent	Response	Rationale
		<ul style="list-style-type: none"> • Addition of 2 new DPPCCs • Removal of Proving test requirement for DCC meters (NB SRAG recommended removal of the proving requirement for all MC=G too) • Optionality of D0022.
TMA Data Management Ltd	Yes	We would like to note that changes required for CP1469 have a higher impact and higher costs than the original change of the existing flows proposed by withdrawn DTC CP 3492.
Western Power Distribution	Yes	[None]

Question 2: Do you agree that the draft redlining delivers the CP1469 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	3	0	1

Responses

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

Respondent	Response	Rationale
British Gas	Yes	[None]
Brookfield Utilities	Yes	[None]
IMServ Europe	No	<p>Allowing Suppliers to validate and estimate consumption data could introduce a conflict of interests between Supplier billing and the Settlement process.</p> <p>On a number of occasions as a HHDC we have come under pressure from Suppliers to revise data outside of the estimation methods in BSCP502, in order to appease an end customer, normally to reduce estimated data downwards where this reduction has not been based on verifiable facts.</p> <p>Estimation of export data is a particularly sensitive area since current BSCP rules state the HHDC shall estimate zero data in the first instance and then should assess if operational data is available in order to allow none zero estimation. Since this can have a significant financial impact on the generator, impartiality is a significant concern.</p> <p>Removing the independence of an accredited HHDC performing this activity would increase the risk of this happening and would reduce the accuracy of the Settlement Process.</p>
Npower Group	Yes	Yes, npower agrees with the changes made to BSCP502, BSCP503 and BSCP514 in order to deliver CP 1469.
OVO Energy	Yes	[None]
Salient Systems Limited	Yes (with caveats)	<p>Key observations below relate to BSCP 502 redlining.</p> <p>New and changed sections at Appendix section 4 might benefit from section headings that describe</p>

Respondent	Response	Rationale
		<p>supplier sourced/not sourced consumption data rather than DCC enrolled/not enrolled constraints? There's no way to differentiate at HHDC from D0155 data between 'flavours' of supplier sourced consumption data, DCC enrolled or otherwise.</p> <p>New section 4.11 would benefit from definitive statements addressing:</p> <ul style="list-style-type: none"> - requirement/no requirement at HHDC for MAR, Mini MAR validations at supplier sourced consumption data - definitive statements of Supplier responsibility to ensure that data provided to HHDC has been validated as attached to the correct Mpan - advice/reinforcement of Supplier responsibilities/expectations around the management of Alerts? <p>If mini mars are no longer required at DCC enrolled, supplier sourced data then an explanation of the rationale for exclusion would be helpful. If mini mars are appropriate then the requirement would reinforce the need for supplier send of D0010's to HHDC on a regular basis (weekly max schedule, to align with industry tolerance parameter data set).</p> <p>New estimation rules to be applied to metering systems where supplier sourced data is expected implicate requirements upon meter advance data to support estimate refinements – again reinforcing a requirement for D0010 sends from Supplier to HHDC.</p> <p>Optionality rules around D0022 productions at HHDC require further elaboration.</p>
ScottishPower	No	<p>Agree that the draft redlining for BSCP503 and BSCP514 delivers the CP1469 proposed solution but the BSCP502 footnote 19 states 'These processes can also be used where Suppliers obtain Half Hourly data from SMETS compliant Meters using alternative service providers to the HHDC or DCC' the 'alternative service providers' would need to be reflected in the 'Timetable' methods possibly with a statement such as "the HHDC and/or the DCC, and alternative methodologies as agreed."</p>
Siemens Managed Services	Yes	[None]
SP Distribution /	Yes	[None]

Respondent	Response	Rationale
SP Manweb		
SSE Energy Supply Limited	Yes	N/A
Stark Software International Ltd	Partially	As Qu 1 above.
TMA Data Management Ltd	No	We have some specific comments. Once they are addressed, we will be satisfied that the draft redlining delivers the CP1469 proposed solution.
Western Power Distribution	Yes	[None]

Question 3: Will CP1469 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
11	2	0	0

Responses

Respondent	Response	Rationale
British Gas	No	[None]
Brookfield Utilities	Yes	We have been unable to fully quantify the system changes required to enable the D0010 to be received from Suppliers. However, we envisage these to be minimal.
IMServ Europe	Yes	<p>This is a significant change, the extent to which is still unknown – see Question 6.</p> <p>It will have a major impact on our HHDC system, documentation and processes.</p> <p>It will have some impact on our HHDA system, documentation and processes</p> <p>Required changes to HHMO systems are still unclear (see comments under Question 6) and is not included in the above impact assessment.</p>
Npower Group	Yes	<p>CP1469 will have an impact on npower. In particular, we will need to make changes to our settlements and risk systems in implementing this CP and we also expect an increase in data as we believe there will be new data flows.</p> <p>However, the biggest impact will be the need for suppliers such as us to send the elective HH data to the HHDC. We will therefore need to make our own arrangements for collecting, processing and sending data.</p>
OVO Energy	No	We believe that CP1469 supplier impact will be restricted to those suppliers wishing to engage in elective half-hourly settlement. BAU activities will not be impacted
Salient Systems Limited	Yes	SSL will update our HH system solutions to accommodate the new/refined requirements and support our clients during their mobilisation and operation of new processes between supplier and agent.

Respondent	Response	Rationale
ScottishPower	Yes	<p>CP1469 will have a far reaching impact on ScottishPower from Supplier, HHDA / HHDC perspective. This CP will bring extensive changes to our IT systems as well as internal business processes as summarised below:</p> <p><u>As a Supplier:</u></p> <ul style="list-style-type: none"> • We will be required to send HH data to the HHDC and the LDSO which is a change to current HH process. • We would need to make contractual arrangements to support the activity of sourcing HH data via the DCC or alternative retrieval services. • There will be a requirement to send a cumulative register read to the LDSO using the D0010, at an Mpan level, a method for this would need to be developed. There would be a need for changes to the D0289 data flow as well as a change to MDD to hold the new DPPCC's. • Our Supplier System would need to be modified to accommodate the change in precision of data required. • Our Billing system would require extensive changes to cater for the Billing arrangements of Elective HH sites. This would require the development of new IT functionality and file interface communication between Supplier system and Supplier Billing system. <p><u>HHDA/HHDC:</u></p> <ul style="list-style-type: none"> • This CP would bring key changes to HHDC & HHDA processes and therefore have a significant impact on ScottishPower's HHDC system. • Extensive IT system changes would need to be undertaken with an estimated delivery date of at least 6 months. <p><u>HHMOA:</u></p> <ul style="list-style-type: none"> • With regards to the changes to BSCP514 ScottishPower would have no objection to this CP. These Elective HH sites would not require Proving to be conducted. <p><u>Smart Metering:</u></p> <ul style="list-style-type: none"> • No objection to this CP and believe it serves the required purpose. The only point raised is the

Respondent	Response	Rationale
		footnote 19 in BSCP502 as mentioned above
Siemens Managed Services	Yes	There would be significant changes required to our HHDA and HHDC systems to process these new data flows.
SP Distribution / SP Manweb	Yes	As an LDSO, we will have to update our systems and processes to accept the revised D0010 data flow.
SSE Energy Supply Limited	Yes	<p>We will be impacted by associated DTC proposals and therefore by extension CP1469 will impact us. The amendment to the J0098 'Retrieval Method' would require system changes (some validation) (one-off), as noted in our response to Question 1.</p> <p>Overall, we do not believe the complexity of managing this Elective HHS mechanism should be underplayed. As each proposal is developed the extent of the overall impacts are being better understood and realised to be more significant, especially when considered in aggregate.</p>
Stark Software International Ltd	Yes	Yes. Various system and procedural changes will be required to HHDC activity depending on the final outcome of this CP. Our recommendation is that no changes need to impact HHDA apart from accommodating the new precision of the D0036 ie no new flows should go to HHDA.
TMA Data Management Ltd	Yes	CP1469 would impact our HHDC and HHDA systems as well as our procedures
Western Power Distribution	Yes	Impact would be limited, however, if there were a significant increase in the frequency of D0010's being sent by suppliers this would cause operational issues. See our comments below.

Question 4: Will your organisation incur any costs in implementing CP1469?

Summary

Yes	No	Neutral/No Comment	Other
10	2	0	1

Responses

Respondent	Response	Rationale
British Gas	No	[None]
Brookfield Utilities	Unknown	Subject to our answer in question 3 (above).
IMServ Europe	Yes	<p>There will be both a one off development cost and increased ongoing costs in order to support our activities as HHDC and HHDA under this Proposal</p> <p>A high level estimate of the implementation costs for HHDC/DA activity would be around 285 man days of effort, dependant on the exact requirements.</p> <p>In addition to this there would be training, documentation, internal reporting costs</p> <p>Ongoing costs are also difficult to determine since the number of such sites is unknown and again the need for manual intervention required to support the process when things go wrong is unclear – see response 6 for possible examples of this.</p> <p>There will be some additional DTN costs due to the extra flows being passed back and forth.</p> <p>Our HHMO systems and processes may have similar impacts to the above.</p>
Npower Group	Yes	npower will incur costs in implementing CP1469 because of the various system and process changes that will be required. We will also incur costs in setting up arrangements to process and send HH data to the HHDC.
OVO Energy	No	As above.
Salient Systems Limited	Yes	<p>Once-off costs to design, develop, test system solutions.</p> <p>Details of cost probably inappropriate at this time without a more complete view of all BSCP changes that will be required to complement this CP and fully support effective elective HH business processes (</p>

Respondent	Response	Rationale
		particularly changes that implicate the distribution of MTD attached to DCC enrolled meters at change events, possibly also accommodating reduced/minimal scope of MTD required at HHDC).
ScottishPower	Yes	Unable to give an exact cost analysis at this stage as full impact assessments on the various IT systems for Supplier and HHDC / HHDA would only be undertaken if CP1469 were to be approved for implementation. However, it is expected that if implemented the CP would bring substantial cost for ScottishPower.
Siemens Managed Services	Yes	<p>One-off: Analysis, development, testing and implementation.</p> <p>On-going: Processing of additional data and possible increase in headcount to facilitate BAU. Additional hardware cost associated with increase in data volumes. DR costs will increase.</p> <p>Costs to be determined as product from full Impact Assessment that would have to undertaken if this CP is Approved.</p>
SP Distribution / SP Manweb	Yes	We would expect any costs to implement the receipt of the D0010 data flow to be minimal.
SSE Energy Supply Limited	Yes	<p>In terms of CP1469 specifically, if we do not utilise Elective HHS then the costs will predominantly be borne from the DTC changes and alignment of releases. We are supportive of the Ofgem stance that Elective HHS should not mandate changes on Suppliers not wishing to participate given the risks to consumers in making IT changes on top of the significant changes being made, especially for dual fuel suppliers.</p> <p>As and when further proposals are raised we will be able to assess the broader system and business process impacts of the entire solution. These impacts will chiefly depend on the extent to which existing HH and NHH process are amended and any mitigation non participating Suppliers may need to take.</p> <p>Outwith this proposal, if we do utilise Elective HHS then we anticipate the significant costs are likely to arise from the contracts to manage HH sites. These remain a barrier and we expect them to continue to be so the foreseeable future. We recognise that economies of scale should have an impact in the long-term however, given the lack of certainty on</p>

Respondent	Response	Rationale
		<p>market take-up of Elective HHS we would not expect to see HH costs come close to NHH costs for the foreseeable future. The system changes and revisions to our Smart metering solution cannot be fully assessed till the full suite of proposals, including any of those which have not been identified as necessary, have been raised.</p> <p>It should be noted that because this change is part of a suite of changes it is not practical to provide individual costs for each proposal because it would be managed as part of a wider project.</p>
Stark Software International Ltd	Yes	Approx 2 man months depending on the final solution. Mostly one off costs with minor on-going additional costs – offset by additional income.
TMA Data Management Ltd	Yes	The cost of CP1469 would have a high one off cost for development, testing and implementation and an on-going low to medium cost.
Western Power Distribution	Yes	Costs would be limited.

Question 5: Do you agree with the proposed implementation approach for CP1469?

Summary

Yes	No	Neutral/No Comment	Other
10	2	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	[None]
Brookfield Utilities	Yes	We support the implementation of this change to be included in the June 2017 release.
IMServ Europe	No	<p>This is a significant change which will impact our HHDC/DA/MOA systems and an implementation date of 29th June 2017 could be extremely challenging should there be any delay in this being approved / the exact requirements being confirmed / should there be further CPs that would impact these same systems.</p> <p>It may be that we would not be ready to offer such a service from the Go Live date. At least 9 months lapsed time is required from finalisation of the requirements and all associated changes through to the implementation date.</p> <p>It is hard for us at this stage to estimate the impact and therefore timescales on our HHMO systems as the exact requirements are unclear.</p>
Npower Group	Yes	We agree in principle with the proposed implementation on 29th June 2017, although this will depend on when SVG will actually approve the change. We will require a minimum of six months from approval to deliver the basic changes to our systems and processes, and would therefore appreciate the maximum amount of notice before the changes being proposed are implemented.
OVO Energy	Yes	OVO is in full agreement with implementation approach for CP1469 and related proposed DTC CPs
Salient Systems Limited	Yes	June 2017 is entirely achievable to implement the requirements attached to this CP. However, we believe that additional CP's will be required to square the circle to fully support elective HH settlement schedule objectives and those CP's will need to be finalised before end 2016 in order to

Respondent	Response	Rationale
		fully illuminate risk to a June 2017 implementation date.
ScottishPower	Yes	Agree with the proposed implementation approach to coincide with lead time for the associated DTC changes. June 2017 release is a realistic implementation date.
Siemens Managed Services	No	We believe that the proposed implementation as part of the June 2017 Industry Change Release does not provide sufficient time for fully integrated testing. To insure a robust solution is implemented the minimum Risk to Settlement we anticipate cross Party / Agent joint testing project managed by Elexon. To achieve a satisfactory outcome to JIT then an implementation of November 2017 is a realistic timescale.
SP Distribution / SP Manweb	Yes	[None]
SSE Energy Supply Limited	Neutral	<p>We are unable to provide a definite view on whether we can accept the implementation approach for CP1469. As confirmed in our response to DTC CP 3496 and previous MRA Request for Information, we think it would sensible to defer making decisions on the implementation dates till the complete Elective HHS has been defined and suitable change proposals have been raised and assessed. The impacts on companies that do not participate in Elective HHS have not and cannot be assessed till all the proposals have been raised, at the least. We understand there is some uncertainty of what the proposal for the Change of Measurement Class proposal will be - this is a crucial part of the Elective HHS process for participating and non-participating Suppliers.</p> <p>Our final assessment for DTC CP 3496 will be confirmed to the MRA. Due to the impacts on non-participating Suppliers we are unable to accept the solution. Nevertheless, if the solution is accepted by industry our assessment indicates the June 2016 implementation date may not be achievable, instead several months lead time (i.e. leading us to the next BSC release) would be required.</p>
Stark Software International Ltd	Yes	Yes. June 2017 is comfortable providing arrangements are fixed by early March 2017.
TMA Data Management Ltd	Yes	[None]

Respondent	Response	Rationale
Western Power Distribution	Yes	[None]

Question 6: Do you have any further comments on CP1469?

Summary

Yes	No
6	7

Responses

Respondent	Response	Comments
British Gas	No	[None]
Brookfield Utilities	No	[None]
IMServ Europe	Yes	<p>The following are specifically covering redlined BSCP502:</p> <p>#1 Section 1.4 states the Suppliers obligation as:</p> <p>'to validate and estimate data where validation is not being undertaken by the HHDC' – does this imply the Supplier will only estimate data where the Supplier is validating data and if so does this include missing data since this technically hasn't failed validation?</p> <p>This seems to be contradicted in section 3.4.6, maybe for clarity 1.4 should say:</p> <p>'to validate and estimate data where validation and estimation is not being undertaken by the HHDC'</p> <p>#2 3.2.1.4 Does the HHDC really need to send a D0012 for such sites, this doesn't make sense to do so.</p> <p>#3 3.2.1.5 Do we need to add some clarity covering that the HHDC will not be collecting data for all Elective Sites? Currently this implies the HHDC will attempt data collection for all sites?</p> <p>#4 3.2.1.6 Should a comment be added to clarify that Proving is not required for Elective HH here as well as in Section 4.6?</p> <p>#4A 3.4.1.11 If the Supplier is sending estimated data to the HHDC, how can a HHDC construct a meaningful D0022 / is this required at all?</p> <p>#5 3.4.3.3 Where a fault remains unresolved and where the Supplier has sent a D0001 to the MOA, should the recipient of a D0005 be Supplier (where Elective) or HHDC (where not) and not just HHDC. However, I note that it is not possible in the current</p>

Respondent	Response	Comments
		<p>DTC, as there is no MOP to Supplier relationship defined for the D0005. Same comment applies to 3.4.3.6</p> <p>#6 3.4.3.7 HHDC sending update of fault to Supplier -Is this appropriate in the context of elective HH? Maybe the Supplier should be giving the HHDC the update?</p> <p>#7 Section 3.4.6 How should the HHDC handle the following scenarios:</p> <ol style="list-style-type: none"> 1. A Supplier has informed the HHDC that the Supplier intends to validate their own data but data is received that is unvalidated. 2. A Supplier has informed the HHDC that the Supplier does not intend to validate their own data but data is received that has been validated 3. Should the data received in scenario 2 be then validated by the HHDC and such data fails validation, how should the HHDC react? 4. A second but different version of data for the same MPAN and period is sent by the Supplier to the HHDC, how should the HHDC react where the first version perhaps has been validated by the Supplier but the second has not and the HHDC is not expecting to validate the data? 5. Where data has been validated and flagged as valid by the Supplier, but values are so erroneously large they would cause the Settlement process to fail, is Elexon satisfied that the revised BSCP502 contains sufficient controls to minimise this risk? <p>#8 3.4.6.3 This seems to suggest that the Supplier has to detect consumption at de-energised sites and cannot ask the HHDC to do this, is this correct? Also, should a site be retrospectively de-energised would the Supplier be expected to revalidate history data back to the change of energisation status and potentially raise a fault?</p> <p>#9 3.4.6.7 The 'When' box is empty and is ambiguous, could this be clarified.</p> <p>#10 3.4.6.8 How should the HHDC behave if no data is sent by the Supplier where the Supplier has indicated that they will perform estimation when required – for example there is a gap in the data the Supplier has sent and the HHDC is expecting the</p>

Respondent	Response	Comments
		<p>Supplier to estimate this gap but the Supplier hasn't?</p> <p>#11 Proving Tests – how should a HHDC react if a Proving Request is received?</p> <p>#12 Section 4.4 Requesting a Metering Investigation -First paragraph should also include Supplier?</p> <p>#13 Estimation Methods - Section 4.12 method 1.e Need to change reference from HHDC to include Supplier, i.e. the Supplier can estimate data using EAC and Profile Class and 1.f also needs reworking?</p> <p>#14 How is the D170 to request historic data by the new HHDC from the old HHDC expected to work? Will there be a Dxxxx from old HHDC to HHDC exchange supported in the DTC?</p> <p>#15 Why is the Supplier / HHDC not performing the meter advance reconciliation check, i.e. Section 4.1.5 for DCC enrolled meters, this is still a valid check and would improve the quality of data entering Settlements if the meter advance could be obtained. Obviously both the Dxxxx and a register read would be required for the Supplier / HHDC to do this. If the answer is the Supplier/HHDC is not performing this check because they won't have a meter register advance to compare the data against, how then would the Supplier / HHDC estimate data using method 4.12.c 'meter advance available'?</p> <p>#16 Why is the Supplier / HHDC not checking for alarm flags? Do these meters not support alarm flagging? If they do then checking these would also improve data quality</p> <p>#17 If this is an optional service HHDCs can choose to offer or not, this should be clearly stated in BSCP502, probably in section 1.</p> <p># 18 Does Elexon anticipate that this change may cause HHDCs to have to have their systems re-accredited?</p> <p>#19 Has the full impact on PARMs been considered since Suppliers can choose how frequently they want interval data from DCC, where this is less frequently than daily this will impact the II performance in terms of percentage energy. Similarly, if the read frequency is, say, monthly,</p>

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		<p>then SF performance could be impacted.</p> <p>Comments on BSCP503:</p> <p>#1 How should a HHDA who is not offering this service react should they receive the Dxxxx flow from a HHDC?</p> <p>#2 Again, if this is an optional service the HHDA can choose to offer or not, this should be explicitly stated in the BSCP</p> <p>Comments on BSCP514:</p> <p>#1 There is a bookmark error in section 6.3.5.5 and several other places in the document</p> <p>#2 Although this sounds really simple for from a MOP perspective, initial analysis has lead us to conclude that this could be a sizeable piece of work with significant system changes, for example the CoMC Process/Building D0268s...</p> <p>#3 We would presume in loss of appointment/most instances, the HH MOP won't be the agent who installed the meter, so will this be a P272 style CoMC process, except, when we convert a D0149/D0150/D0313 into a D0268 currently, it sort-of works because we have similar data items. For SMETS, MOP will only receive the D0149/D0150. Outstation (02A) and Channels (04A) are mandatory groups in the D0268 but they can't be derived from values in the D0149/D0150.</p> <p>There are no D0313 in SMETS world, in theory the D0313 dies-out/fades away when PC 1-to-4 go SMART and PC 5-to-8 sites have gone HH.</p> <p>In the SMART world the MOP doesn't hold Comms information, passwords, channel configuration, etc. MOP won't have anything to do with the programming/testing/configuring of the meter, that all happens between the Supplier and the DCC.</p> <p>So how will MOP know what to populate in the D0268, defaults? Or is the D0268 is changing?</p> <p># 4 Currently the NHH to HH CoMC process is very complex (P272 has demonstrated this) and although we are sure it will be a lot simpler with SMETS meters, the volumes could be very high so it needs to be a slick process, we think BSCP514 probably needs SMART CoMC process/timelines section so we know what's expected.</p>

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		<p>The red line changes in BSCP514 focus on the fact that proving tests are not required for SMETS meters, we think MOPs will be fine with this idea as there is an Industry CP that is in progress which suggests that proving tests are not required on meters which use a pulse multiplier of 1, the idea is that for some Outstation types we need a proving test (e.g. PRI meters) and for others we don't (E.g. Elster, EDMIs). We are not sure how this will work with SMETS, if a SMETS meter has an Outstation types it could be added to the 'excluded' list, if not then we need to identify SMETS meters another way i.e. Measurement Class?</p> <p>#5 Is there a requirement for a HH SMETS meter to hold a meter type (J0483 in the D0150, not in the D0268), currently all HH meters are defaulted to 'H', in NHH, the industry has gone to a lot of trouble to define 10 different meter types for SMETS hardware, are these required in HH? Presumably it's possible for sites to move from HH-to-NHH, if data items are left out of the conversion process they could they be lost permanently.</p> <p>#6 Meter changes, will SMETS meters be covered by In service testing (IST), or will the PMC guideline COP4 apply i.e. replace the meters at 10 or 15 years, presumably all the appointed HH MOPs must have the ability to replace a SMETS meter if its faulty?</p> <p>#7 There are a few areas which haven't been mentioned but might be relevant, although someone may have considered these and they are nothing to worry about, but it might be worth mentioning:</p> <ul style="list-style-type: none"> • If a site is traded HH then we think COP4 apply & if so how does this impact HH MOPs, for example COP4 says W/C meters must be commissioned, will the installing SMETS MOP transfer W/C commissioning records? Will the HH MOP need to hold the meter manufacturers test certificates, this process doesn't work well now and I imagine SMETS will make things worse, does COP4 need changing to exclude SMETS meters from some/all requirements? • TAA visits, presumably SMETS meters in HH MOP are out of scope? • D0001 faults process, does the 100% at

Respondent	Response	Comments
		15W/D resolution also apply to SMETS meters?
Npower Group	No	[None]
OVO Energy	No	[None]
Salient Systems Limited	Yes	<p>CP1469 does deliver appropriate assurance of delivery of DCC/Supplier sourced consumption data through to settlement processes. However, on its own it does not assure the complete set of elective HH business processes that will be required across parties to fully support early adoption of elective HH settlement.</p> <p>Our organisation have an obvious incentive to assure that all processes required at HH agent systems to support HH elective HH MS migrations are uncovered clearly and unambiguously and are addressed as early as possible. We would be very happy to provide resource into Elexon working groups who will be pursuing complementary CP's.</p>
ScottishPower	Yes	<p>Half Hourly MOP – BSCP514</p> <p>We believe there is no justification for performing a full change of measurement class when we change the reading frequency for a smart meter from daily or monthly to half hourly:</p> <ul style="list-style-type: none"> There is no physical change to the meter and no change to the installer skillset when the meter changes from NHH to HH - all SMETS meters are capable of HH consumption. The move from NHH to HH could be temporary (for example if there is a change of tenancy and the new customer does not give us HH reading consent), in which case we'd need to do a ComC back to NHH. We could be looking at a coincident change of measurement class with a change of supplier. <p>In short, performing a ComC adds a significant amount of additional traffic and complexity to our processes that I think we could easily avoid.</p>
Siemens Managed Services	Yes	<p>1) Would the introduction of these new data flows and their processing constitute a Material Change for the HHDA and HHDC Agents, and hence trigger Requalification?</p> <p>2) We would like clarification of the structure of the new flows raised as MRA DTC CP 3496 to support this CP. In the DTC CP 3496 - Appendix</p>

Respondent	Response	Comments
		<p>1 redlined changes.pdf both the proposed Half Hourly Advances for Inclusion in Aggregated Supplier Matrix flow and the Half Hourly Advances UTC flow have the new Supplier Validated Flag J item at flow level. However the description of this J item implies that it relates to individual meters. If this is the intention of the J item it should be contained within the 101 Mpan Cores Group or 25B Mpan Cores Group on the respective flow.</p> <p>The current position of the Supplier Validated Flag J item means it will only appear once per data flow file and will read as meaning that all the data for all the mpans in that occurrence of the file have been validated by the Supplier or none had been. If this is the intention of the flag then the J item description requires amendment to reflect this.</p> <p>3) We would expect all flows and their documentation to use consistent measurement values e.g. watt-hours (Wh) or kilowatt-hours (kWh).</p> <p>4) A six month lead time from Approval to Implementation is not sufficient to satisfy to level of change.</p>
SP Distribution / SP Manweb	No	[None]
SSE Energy Supply Limited	No	[None]
Stark Software International Ltd	Yes	<p>As mention in Qu 1, we believe that these proposals are a combination of being over-prescriptive and over-flexible at the same time.</p> <p>Many alterations have been made to BSCP502 that allow for various combinations of the Supplier providing the data, another party doing this on the Supplier's behalf, for the Supplier to do part of the validation (eg data exceeds permitted COP level) in all cases but not necessarily the remaining validation. Estimation responsibility likewise appears to be unclear between Supplier and HHDC. The Supplier flagging data as validated or unvalidated is impractical a) as under these proposals, validation could be split between Supplier and DC and b) initial data is likely to be unvalidated at D+1 but then change status later. In our opinion, if data is sent by Supplier, it should always be sent to HHDC raw and with data flags attached to avoid confusion of</p>

Respondent	Response	Comments
		<p>responsibility.</p> <p>References to a new flow based on D0036/D0275 again is vague requiring both Suppliers and Agents to make provision for two new flows which may or may not be required by bilateral Supplier/Agent pairings.</p> <p>None of the above explicitly allows for a direct HHDC/DCC situation which is a neat solution that allows HHDCs to accommodate DCC data with little or no impact on Suppliers. Bilateral arrangements could allow other combinations.</p> <p>We question whether much of the changes are required at all, as the provision of the data from the Supplier/DCC/SMSO is very similar in concept to retrieval services allowed for already within HH arrangements – eg those used by HHDCs for manual data collection from site collection via a third party.</p> <p>Other points noted are reference to D0010s needing to be sent by the Supplier to LDSO, but there appears to be no provision for the Supplier to send register reads to HHDC where they would be needed in any case for quality estimation and from where they could easily be forwarded on to LDSO as already required at month end for MC=F&G.</p> <p>As the source of HH data could be Supplier/SMSO/AgentDCC interface, there may be an argument for more Retrieval Methods that just "S". (or taking our "is most of this even needed" point above – there are possibly no changes required)</p> <p>We can see no point in sending new format flows to HHDA as surely the main advantage of using HHDCs at all is to avoid changes to the HHDA input flow.</p>
TMA Data Management Ltd	No	[None]
Western Power Distribution	Yes	<p>We welcome the addition of the rule to require the Supplier to send D0010s for cumulative register reads to the LDSO on a monthly basis. We would like to clarify that this is all we receive and the Supplier will not take an option to send a D0010 every time a reading is taken if this is more frequent than monthly. Should consideration be given for a restriction, similar to pre-payment meters, to limit the number of D0010 flows being sent?</p>

BSCP502

Respondent	Location	Comment
ScottishPower	Footnote 19	BSCP502 footnote 19 states 'These processes can also be used where Suppliers obtain Half Hourly data from SMETS compliant Meters using alternative service providers to the HHDC or DCC' the 'alternative service providers' would need to be reflected in the 'Timetable' methods possibly with a statement such as "the HHDC and/or the DCC, and alternative methodologies as agreed."
Siemens Managed Services	Section 3.4.6.5	WHEN states 'Following 3.4.2.4' should be 'Following 3.4.6.4'
Stark Software International Ltd	3.4.6.2	Reference to "Internal Process" not needed
	3.4.6.3	Should mention Method = D0001
	4.12.1	This appears to be identical to 4.2.1 and should not be included. All that is needed is a note not apply inappropriate estimation methods to DCC meters. This would have the benefit of retaining a single BSCP 502 Estimation description for any HH estimation method. This BSCP reference is used by some HHDCs to advise Suppliers of the method used in the D0022.
TMA Data Management Ltd	3.2.1 footnote 3 page 9	"3 The D0155 can be used to inform the HHDC of the Supplier read schedule for SMETS Meters by notifying the Retrieval Method of 'S' and an appropriate value of Regular Reading Cycle.. " suggest that informing the HHDC of the read schedule of SMETS meters is optional. Could it be reworded to "3 The D0155 is used to inform the HHDC of the Supplier read schedule for SMETS Meters by notifying the Retrieval Method of 'S' and an appropriate value of Regular Reading Cycle.. "
	3.4.6	The title of 3.4.6 from "HHDC obtains data from the Supplier, processes and sends consumption data for SVA Metering Systems enrolled by the Data Communications Company (DCC)19." Should be changed to "HHDC receives data from the Supplier, processes and sends consumption data for SVA Metering Systems enrolled by the Data Communications Company (DCC)19. It is the Supplier's responsibility to send the data, this should be reflected in the title.
	4.12.2 c	Data Flag 'Flag. To be corrected to Data Flag E

Respondent	Location	Comment
	4.12.2 f	Change "Where the Supplier has not provided the data specified in 'g'," to Where the Supplier has not provided the data specified in 'e',