

Daniel Simpson  
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Dear Daniel,

### **Consultation on Radio Teleswitch Broadcasting Provision from January 2018**

We welcome the opportunity to provide our views regarding ceasing the Access Provision on 31 December 2017 or how to facilitate extension from 1 January 2018 through to 31 March 2020.

As you are aware we have been following the situation regarding the Radio Teleswitch Service (RTS) closely since 2010 and have undertaken a number of pieces of work and consultations ourselves in this area (see below).

As our Teleswitch Agent you currently provide data files detailing the switching times for all Teleswitch Users and Teleswitch Groups on a daily basis for use in Settlement.

We have an agreed contingency approach in the event of system failure or loss of the RTS in our paper to the Supplier Volume Allocation Group in February 2013 ([SVG144/05](#)). The paper concluded that the contingency options, in terms of Settlement, are as follows:

- The Supplier Volume Allocation Agent (SVAA) would continue to use the last (or most suitable) teleswitch file sent before the system failure and would continue to use the same file for each subsequent Settlement Day;
- It may be possible to mitigate inaccuracies in the default data by adjusting the switch times of selected Standard Settlement Configurations in the teleswitch file; and
- A controlled switch-off of the RTS would allow the RTS to be used to set the final instructions to an appropriate default.

We also conducted a [consultation](#) of the way forward for Dynamic Teleswitching in the future in April 2012. In June 2014, the PSRG consulted on the '[Settlement of Dynamically Switched Meters](#)'. The consultation report set out:

- how switch times for RTS Standard Settlement Configurations (SSCs) are currently processed;
- how dynamic switching will be carried out under the DCC arrangements and the implications for Settlement; and
- Options for change.

At its 3 February 2015 meeting, the SVG ([SVG168/09](#)) agreed recommendations on the approach to Dynamic Switched RTS. Subsequently, we have published [guidance](#) to Suppliers on the mapping of Standard Settlement Configurations when the RTS Meters are replaced with Smart Meters.

As such ELEXON is prepared for the cessation of the Service. However, we are concerned about the potential Settlement impacts. Furthermore, we believe that Suppliers, Distribution Businesses and consumers will require an extension to the RTS beyond the 31 December 2017, especially where the teleswitch Meter has not yet been replaced by a Smart Meter.

We have also noted concerns by industry parties on the fall-back programmes at the loss of signal. It is believed that some Meters will only continue to switch for a limited period or will reset to mid-night

on power failure. This would also be an issue for our Settlement calculations (noting the impact on the consumer would be more pressing).

We have provided a formal response to each of your consultation questions where appropriate below. We are keen to follow the progress of this consultation and would welcome a face to face meeting once responses have been published to discuss the situation in more detail.

Yours sincerely,

Kevin Spencer

**ELEXON Design Authority**

**ELEXON Response to the ENA Consultation on Radio Teleswitch Broadcasting Provision from January 2018**

Question Number	Question	Response
1	Do you understand the purpose for this consultation?	Yes
2	What is your company's current role or interest in the Radio Teleswitch Service?	The Teleswitch switching times are used as part of our Settlement calculations to determine a consumers' meter volume (to demand model the consumer's usage profile with a Teleswitch).
3	Does your company have any need for the Radio Teleswitch Broadcasting Service to continue past 31 December 2017?	To retain Settlement accuracy for all Suppliers, we believe the Service is required beyond 31 December 2017. If we freeze the 'Teleswitch times' prior to the majority of consumers having Teleswitch Meters replaced with smart Meters our allocation of Meter volumes is likely to become increasingly less accurate over time. Seasonal effects may also not be captured if the last switching reflects the switching on the 1 January 2018 (for example). We are also concerned that some switches will not default correctly or will re-set on loss of power. Drift in switching times may also occur if Teleswitch internal clocks if not corrected by a signal.
4	If you need the service to continue past 31 December 2017, how long would you need the service for?	We do not believe that all teleswitched consumers will have a smart meter replacement by 2017. Hence, the Service will be required beyond that date to the end of the rollout, currently estimated as 2020.
5	If you are a Supplier; a. How many of your time switches are Radio Teleswitches controlled using the broadcasting service? b. What would be the effect on your	Not applicable to ELEXON but we are happy to provide counts of Teleswitch Metering systems from our Settlement data if required.

	consumer's switching schedules should the Radio Teleswitch Service cease?	
6	<p>If it is decided to extend the service, what is your view on how the cost of extending the service should be recovered? Options could include:</p> <ul style="list-style-type: none"> <li>a. Socialised recovery across all network users,</li> <li>b. Recovered only from MPANs with Radio Teleswitch SSCs,</li> <li>c. Recovered only from network users who indicate a need for the service to continue.</li> </ul>	<p>We await to see the industry position on this question but we are not sure that Option B is viable. If the extension cost were passed through to consumers it would be disproportionate and if not would be similar to Option C. These consumers may be vulnerable in nature.</p>
7	<p>Are there any other issues which haven't been captured?</p>	<p>We understand that the Service is used for network management particularly in the Scottish Distribution regions. It may be this requirement that drives the need to extend the Service beyond 2017.</p>