

CP1473 'Changes to the Long Term Vacant Entry Criteria'



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About This Document

This document is the CP1473 Final CP Report which ELEXON has published following the final decision from the SVG to approve CP1473.

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 views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1473 solution.
- Attachment B contains the full responses received to the CP Consultation.

1 Why Change?



What is the Long Term Vacant process?

Modification [P196 'Treatment of Long Term Vacant Sites in Settlements'](#), implemented in February 2007, established the Long Term Vacant (LTV) process. This process details when a Supplier can instruct the Non Half Hourly Data Collector (NHHDC) to treat a Site as vacant. The NHHDC can then enter zero values into Settlement, providing a more accurate reflection of the true consumption at the site.

For a site to enter the LTV process it must meet the criteria detailed within [BSCP \(Balancing and Settlement Code Procedure\) 504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' 4.15.1](#):

1. The site is energised according to the Supplier Meter Registration Service (SMRS).
2. The Supplier:
 - has received from the NHHDC at least two [D0004 'Notification of Failure to Obtain Reading'](#) data flows, which are at least 75 calendar days apart and not more than 215 calendar days apart, with the [J0024 'Site Visit Check Code'](#) (SVCC) data item populated with code 02 'Site not Occupied'; and
 - has not received any D0004s with the J0024 data item populated with anything other than 02 in the interim; and
 - has not received any Meter register readings for that Metering System in the interim.
3. The Supplier has made proactive attempts to identify the owner of the property to obtain a Meter reading. When an owner is identified, attempts must then be made to contact them and obtain a reading.
4. If the owner is already known, the Supplier must make attempts to contact them to arrange a Meter Reading.

The Supplier must keep auditable records showing that all of these criteria have been met in order to identify a site as LTV. If all the above criteria have been met, but the Supplier has evidence of consumption on the Metering System, the site must not be identified as LTV.

The effect of the criteria in point 2 is that two consecutive D0004s with an SVCC of 02 are required to allow the site to enter into the LTV process. If a D0004 with another SVCC is received then the process is reset and the next SVCC of 02 will restart the process.

What is the issue?

The LTV process today is reliant on the Site Visit Agent entering the correct SVCC once a site visit is completed. It's common for the Visiting Agent to enter an SVCC of 20 – 'No Access' with supporting evidence which suggests that the site is vacant. Two D0004s with a check code of 02 can be received 75 calendar days apart but, due to the receipt of a 20 check code during this period, the site does not qualify as vacant.

This prolongs timescales to enter a site as LTV as the process must be reset. In the worst cases the two consecutive 02 check codes may never be achieved, creating inefficiency and unnecessary costs for Suppliers. Once a Site has been classed as LTV, the criteria in

D0004 SVCC Codes

Site Visit Check codes are defined by the Master Registration Agreement (MRA) in the Data Transfer Catalogue (DTC).

There are currently 41 Codes. These identify the nature of checks made during the visit or the reason that the visit failed to obtain readings.

- 01 Site occupied
- 02 Site not occupied
- 03 Meter system energised
- 04 Meter system de-energised
- 05 Equipment/meter damage
- 06 Suspected tampering
- 07 Timeswitch stopped
- 08 Phase/fuse failure
- 09 Consumption detected on de-energised meter
- 10 Change of meter
- 11 Zero reading on MD register
- 13 MD register on full scale
- 14 More than 1 MD register reset
- 15 Meter stopped
- 16 Seals damaged
- 17 Seals missing
- 18 Unsafe premises
- 19 Call not made on routine visit
- 20 No access
- 21 Refused access
- 22 Meter blocked
- 23 Wiring dangerous or incomplete
- 24 Token Meter Reset
- 25 Token Meter Not Reset
- 26 Agent failed to keep appointment
- 27 Meter reading modified manually by NHHDC in accordance with BSCPs – site visit not required
- 28 Unable to gain access due to Insufficient address details
- 29 Customer unable to provide access (HH only)
- 30 Unable to gain access to HV environment (HH only)
- 31 Interrogation port unavailable (HH only)
- 32 Wrong meter/outstation password (HH only)

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BSCP504 4.15.3 allows for a wider set of SVCCs to be received while keeping the site in the LTV process, provided that two code 02 check codes are also received.

Proposed solution

British Gas raised [CP1473 'Changes to the Long Term Vacant Entry Criteria'](#) on 5 October 2016. It proposes to alter the qualification criteria to be more reflective of the above remain criteria. A site will be able to enter the LTV process even if D0004s with SVCCs of 18, 19, 20 or 28 are received in between the two qualifying D0004s with a SVCC 02. Suppliers would still need to engage in proactive attempts to identify the owner to obtain Meter readings via mail or phone.

The LTV entry criteria in BSCP504 4.15.1.2 would be changed to add additional SVCCs:

- 18 'Unsafe Premises'
- 19 'Call not made on routine visit'
- 20 'No Access'
- 28 'Unable to gain access due to insufficient address details'

The further criteria of not receiving Meter register readings and the Supplier having to evidence sufficient attempts to contact the owner/occupier will remain unchanged.

Proposer's rationale

Metering Systems often fail to qualify for the LTV process due to an SVCC of 18, 19, 20 or 28 being received between the two qualifying 02 SVCCs. The current criteria prevent sites being entered into the LTV process and stop a zero Estimated Annual Consumption (EAC) being applied for a site a Supplier is confident is vacant, producing an inaccurate Settlement position.

The SVCCs introduced by this CP are currently used in the 'remain' criteria for the LTV process. The Proposer believes that the additional check codes (18, 19, 20 and 28) do not evidence that a site is occupied on an individual basis. This proposal allows the recent Site Visit history to be considered and the context in which these check codes have been received to be understood.

The Proposer believes that aligning the qualification and remain criteria will not create any additional risk to Settlement. The two SVCCs of 02 coupled with the further required criteria already in place, such as proactively attempting to contact the customer and not allowing the proposed codes to interrupt the process, are enough to prove a site is vacant. The process will be robust enough to ensure that occupied sites are not entered into the LTV process. The LTV process is in the scope of the BSC (Balancing and Settlement Code) Audit providing further assurance that Suppliers will only instruct their NHHDCs to apply the process for correctly identified sites. The current criterion is too strict, preventing the LTV process being applied to justifiably vacant sites.

The Proposer also identified that a change to section 4.15.4.3 will remove a contradiction that exists with section 4.15.4.2. Currently 4.15.4.2 refers to codes detailed in 4.15.2.2 (b) used in the remain process which includes the SVCCs 18, 19, 20 and 28.

Proposed redlining

The proposed changes to BSCP504 can be found in Attachment A

3 Impacts and Costs

Central impacts and costs

CP1473 will require changes to BSCP504. No system changes are needed to deliver the solution and there is no impact on BSC Agents.

The central implementation costs will be approximately £240 (one ELEXON working day) to deliver the document changes.

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

BSC Party & Party Agent impacts and costs

This change proposes only to amend the criteria to enter the LTV process. Therefore, we expect CP1473 will impact the below BSC Parties and Party Agents. Suppliers and NHHDCs may need to change internal processes to reflect the revised criteria in BSCP504 where they pertain to Site Visit Check Codes.

Participant Impacts	
Participant	Impact
<ul style="list-style-type: none">SupplierNHHDC	Changes will be required to implement the solution

Consultation responses indicated that some minor updates to internal systems may be required by BSC Parties or recruitment of additional resource. All of the respondents who indicated they would be impacted supported the CP.

4 Implementation Approach

Recommended Implementation Date

CP1473 is approved for implementation on **23 February 2017** as part of the February 2017 Release, as this is the next available Release and no critical systems changes are required to support this proposal.

The majority of Consultation respondents agreed with the proposed Implementation Date. One respondent advised that they would prefer to wait until June 2017 to provide more time for the necessary internal systems changes.

The SVG committee agreed the proposed February 2017 Implementation Date.

SVG's initial views

The SVG considered CP1473 at its meeting on 1 November 2016 ([SVG189/08](#)).

An SVG Member was initially concerned that the CP could allow more sites to enter the LTV process, which they considered would not be in keeping with the intention of P196. ELEXON clarified that this was not the case. The CP only proposes to stop a site being removed from the process if, in between the above two D0004s with a Site Visit Check Code of 02, the Supplier receives a D0004 with a Site Visit Check Code of either 18, 19, 20 or 28.

An SVG Member commented that they agreed with the intention of the CP. However, they suggested that SVCCs 37 'Unmanned' and 38 'Unable to gain access due to key/code being unavailable' appeared to be very similar to 20 'No access'. The SVG Member suggested that we should consult on the addition of any further SVCCs. The SVG agreed to add an extra question to the consultation, asking if there are any additional SVCCs that do not indicate occupancy and which should be included.

An SVG Member asked if the proposed February 2017 Implementation Date was too tight, noting that the CP would only come to SVG for decision on 3 January 2017. ELEXON noted that the consultation would draw this out.

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

Summary of Consultation responses

Do you agree with the CP1473 proposed solution?

The majority of (eight of ten) respondents support the proposed solution as a sensible approach that will reduce costs and improve Settlement accuracy.

Two respondents disagreed on the basis that they did not think the problem was significant and the risk of having occupied sites wrongly classified was greater. One respondent also considered that it should be down to Site Visit Agents to ensure they enter correct SVCCs.

Will CP1473 impact your organisation or incur you any costs?

Six respondents advised that the proposed change would impact them and require either business process or systems changes. Four respondents indicated they would incur costs in implementation, although not significant and they all supported the proposal.

Do you agree with the proposed implementation approach?

Nine of the ten respondents agreed with the proposed Implementation Date of 27 February 2017 as part of the February 2017 Release. One respondent requested that as some parties will need to make changes to automated systems they would prefer a June 2017 Release implementation.

Do you consider that any additional SVCCs should be included in CP1473 beyond the four suggested?

Five of the ten respondents suggested additional SVCCs that could be included in the Change Proposal. The additional codes recommended by more than one respondent are summarised below:

Summary of CP1473 suggested additional SVCCs				
SVCC	Purpose	Count	Justification	ELEXON's View
34	Suspected demolished	3	Whilst these SVCCs highlight that investigation/action needs to be taken, these SVCCs do not indicate that there is consumption at the site.	Although demolished sites are unlikely to be registering consumption there is an existing process for such sites. Allowing EAC to be set to '0' would be redundant if the sites were de-energised.

Summary of CP1473 suggested additional SVCCs				
SVCC	Purpose	Count	Justification	ELEXON's View
35	Demolished	3	Does not indicate that there is any consumption at the site, so again should not remove a candidate site from LTV process.	Although demolished sites are unlikely to be registering consumption there is an existing process for such sites. Allowing EAC to be set to '0' would be redundant if the sites were de-energised.
37	Unmanned	2	Commonly received for sites that are not Unmetered Supplies, indicating an issue with the quality of the SVCC from the Data Collector (DC) Whilst action is taken to manage DC accuracy, this SVCC does not indicate that there is consumption at the property.	Quality of data from the DC is not a justification for inclusion of a code in the LTV process. There may be many good reasons why a site has been left unmanned permanently or for long periods, or indeed it may never have had a customer present at the site. An Unmanned site may still be recording usage and therefore is not vacant.
38	Unable to gain access due to key/code	2	Does not indicate that there is any consumption at the site, so again should not remove a candidate site.	This code often refers to the type of sites that are not permanently occupied but still register consumption. A Supplier should make attempts to obtain the key/code by contacting the customer before assuming vacancy.

Recommendation on inclusion of additional SVCC codes in LTV Entry Criteria

ELEXON has reviewed the responses and considered the addition of the codes proposed in the Consultation. ELEXON notes that the scope of the CP is to change the LTV entry criteria, aligning with the remain criteria. Although reasons were given for inclusion of the additional SVCCs by respondents, none were compelling or overwhelmingly supported by Parties or the Proposer. Inclusion of additional codes in the entry criteria would create misalignment with the remain criteria, and then require these to be revisited.

Consultation additional comments

One respondent suggested the current D0004 timeframe of 215 calendar days apart should be extended in order to cater for smaller Suppliers with a six-month read cycle. They proposed a maximum qualifying period of 14 months, this would align the process with industry Settlement requirements. This is not within the scope of CP1473 but could be considered through a separate CP in future.

Comments on the proposed redlining

No comments were provided.

SVG's final views

The SVG considered CP1473 at its meeting on 3 January 2017 ([SVG191/02](#)).

An SVG Member queried whether SVCC 28 'Unable to gain access due to insufficient address details' was an appropriate inclusion into the entry criteria. The Member considered that this code implies that it is not possible to attend the site, due to not knowing the address. They suggested that this potentially contradicts the two surrounding SVCCs of 02 'Site not occupied', as someone has must have attended the site in order to establish that it is vacant. ELEXON and other SVG Members agreed that this appeared slightly incongruous, but highlighted that the CP is merely seeking to align the codes used in the 'entry' criteria with those used in the 'remain' criteria (which already include SVCC 28).

An SVG Member noted the reasons expressed by ELEXON and the Proposer for not including any further SVCCs in the entry criteria. This Member highlighted that they had been involved in the original Workgroup discussions for [P196 'Treatment of Long Term Vacant Sites in Settlements'](#), and that the creation of the current rules had been contentious. They stated that they had reservations over the inclusion of SVCC 28 and also 19 'Call not made on routine visit' for the reasons above and because they believed that SVCC 19 demonstrates insufficient agent management. However, they stated that they were prepared to support the CP, on the basis that it does not change the existing requirement to receive two D0004 flows with SVCCs of 02 and since SVCCs 28 and 19 already appear in the 'remain' criteria. The Member noted that they would not support the inclusion of any further SVCCs as they believed this would go against the intention of P196. For example, they agreed with ELEXON's comment in the paper that SVCCs 34 'Suspected demolished' and 35 'Demolished' would be inappropriate inclusions, as a demolished site should be disconnected rather than submitted to the Long Term Vacant process. Other SVG Members agreed. The SVG Member considered that the title of the CP was misleading as it could imply a more significant change to the Long Term Vacant entry criteria.

An SVG Member asked whether the BSC Audit had highlighted any issues with the Long Term Vacant process, as they recalled seeing something in the last BSC Audit Report.¹ ELEXON replied that it was not aware of any. Another SVG Member asked if there was a wider data quality issue. An SVG Member responded that there were long-standing issues with the quality of agent data but that, in their view, it was not realistic to resolve all of these permanently. They also considered that these wider issues were not directly related to the CP, which seeks to align the 'entry' and 'remain' criteria.

Final decision

The SVG has:

- **APPROVED** the proposed changes to BSC Procedure (BSCP) 504 for CP1473; and
- **APPROVED** CP1473 for implementation on 27 February 2017 as part of the February 2017 Release.

¹ Post-meeting note: Page 14 of the [2015/16 BSC Audit Report](#) describes two recurring issues; neither relate to SVCCs.

Appendix 1: Table of summary of consultation responses

Summary of CP1473 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1473 proposed solution?	8	2		
Do you agree that the draft redlining delivers the intent of CP1473?	10	0		
Will CP1473 impact your organisation?	6	4		
Will your organisation incur any costs in implementing CP1473?	4	6		
Do you agree with the proposed implementation approach for CP1473?	9	1		
Do you consider that any additional SVCCs should be included in CP1473 beyond the four suggested?	5	5		
Do you have any further comments on CP1473?	1	9		

Appendix 2: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	BSC Procedure (<i>Industry Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
DC	Data Collector
DTC	Data Transfer Catalogue (<i>Industry Code Subsidiary Document</i>)
EAC	Estimated Annual Consumption
LTV	Long Term Vacant
MRA	Master Registration Agreement (<i>Industry Code</i>)
NHHDC	Non Half Hourly Data Collector (<i>Party Agent role</i>)
NHHMOA	Non Half Hourly Meter Operator Agent (<i>Party Agent role</i>)
SMRS	Supplier Meter Registration Service
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
SVCC	Site Visit Check Code

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
D0004	Notification of Failure to Obtain Reading
J0024	Site Visit Check Code

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	P196 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p196-treatment-of-long-term-vacant-sites-in-settlements/

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External Links		
Page(s)	Description	URL
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/wp-content/uploads/2016/06/BSCP504_v38.0.pdf