

CP Consultation Responses

CP1473 'Changes to the Long Term Vacant Entry Criteria'



This CP Consultation was issued on 7 November 2016 as part of CPC00771, with responses invited by 2 December 2016.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/1	Supplier Agent HHDC, HHDA, NHHDC and NHHDA
STARK		
The Renewable Energy Company (Ecotricity)	1/0	Supplier, Generator
Western Power Distribution	4/0	Distributor
Economy Energy	1/0	Supplier
Scottish Power	1/0	Supplier
E.ON Energy Solutions	1/0	Supplier
British Gas	1/0	Supplier
SSE Energy Supply Limited	1/1	Supplier / Supplier Agent HHMOA, NHHMOA
Npower Group PLC	1/1	Supplier / Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✗	✗	✓
STARK	✓	✗	✗	✓
The Renewable Energy Company (Ecotricity)	✓	✗	✗	✓
Western Power Distribution	✗	✗	✗	✓
Economy Energy	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✓
E.ON Energy Solutions	✓	✓	✓	✓
British Gas	✓	✓	✗	✓
SSE Energy Supply Limited	✗	✓	✗	✓
Npower Group PLC	✓	✓	✓	✗

Question 1: Do you agree with the CP1473 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	2		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
STARK	Yes	The solution provides increased flexibility in the criteria to qualify MPANs for the LTV process; this makes allowance for D0004 flows from attempted AMR monthly reads to be sent between the Site Visit 02 codes, which indicate no read obtainable remotely without causing the MPAN to be reset from the process increasing the chances of more genuinely vacated sites being included.
The Renewable Energy Company (Ecotricity)	Yes	In the terms of the proposal and the intentions it wishes to fulfil, we do agree with the proposed solution. We do however have views on the LTV process itself, which we have outlined in the further comments section.
Western Power Distribution	No	The criteria for a site being classed as "Long Term Vacant" was set out after careful consideration, with specific requirements to ensure that a premises was beyond a doubt, vacant. We do not feel that the change proposal is required. The issue as detailed in the change modification is that the LTV process is reliant on the Site Visit Agent entering the correct SVCC once a site visit is completed, therefore, rather than changing the criteria for LTV sites Site Visit Agents should ensure that the correct SVCC code is entered when it is evident that the site is not occupied.
Economy Energy	Yes	Many sites which are vacant have nullified eligibility due to SVCC's other than 02, are actually vacant and estimated EAC is being produced as opposed to 0 EAC.
Scottish Power	Yes	ScottishPower agrees that this would be an improvement to settlement accuracy for sites which are LTV.

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	<p>We are generally supportive of the proposed change. By allowing SVCC codes 18,19,20 and 28 as well as 02 within the D0004 to keep as site as Long Term Vacant would generally have a positive impact. As things currently stand, the ease with which a site can come out of long term vacant can be detrimental to suppliers and cause unnecessary site visits and estimated billing, which in turn has an adverse operational impact.</p> <p>We believe the change will lead to a positive out turn i.e. less estimation which in turn leads to a positive impact on settlement, as delays in settlement would be less frequent if the suggested SVCC codes were added to the LTV process.</p> <p>Whilst we are in agreement that the revised SVCC should be included, there is a risk that with the inclusion of 19, 20 and 28, that no “eye balling” or actual visit to the premise has actually occurred. This maybe an issue for individual suppliers to consider should they choose to utilise the process.</p>
British Gas	Yes	<p>As the Proposer we believe that the solution improves the Long Term Vacant process without introducing additional risk. The solution will allow more Vacant sites to enter the process. As the process is today a number of sites fail to enter LTV because they do not meet the strict criteria of receiving the two SVCCs of '02' uninterrupted. By allowing the additional SVCCs to be received more sites can be processed as LTV allowing a more accurate estimate of consumption to be completed. The further requirements will still remain in place ensuring that Suppliers only instruct their NHHDC's to enter genuinely vacant sites. The process is part of the Annual BSC Audit which will ensure that only genuinely vacant sites enter.</p>
SSE Energy Supply Limited	No	<p>We agree that it is important for the LTV process to be strictly defined and properly auditable to mitigate the risks of sites incorrectly being treated as vacant. We are not yet convinced that including the 'No Access' code is appropriate. Where a customer does not provide a meter reading or respond to Supplier requests to gain access to the meter, the site may or may not be vacant. The benefit of returning a 'Site not Occupied' as opposed to 'No Access' is that the NHHDC has made a positive judgement that the site is not occupied. If the site is later found to be occupied then it follows that the NHHDC has provided incorrect information and the</p>

Respondent	Response	Rationale
		<p>matter can be looked into.</p> <p>We are of the view is it is better for the industry that some valid vacant sites are not recorded as LTV, as opposed to some (potentially many) sites being recorded as vacant when in fact they are not.</p>
Npower Group PLC	Yes	Extending the relevant SVCCs that allow a site to qualify for / remain in the LTV process is a sensible approach.

Question 2: Do you agree that the draft redlining delivers the CP1473 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10			

Responses

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

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
STARK	Yes	
The Renewable Energy Company (Ecotricity)	Yes	We believe that the draft redlining delivers the CP1473 solution.
Western Power Distribution	Yes	We agree that the draft redlining delivers to CP1473 proposed solution however, we do not agree that this modification is required.
Economy Energy	Yes	
Scottish Power	Yes	
E.ON Energy Solutions	Yes	The redlining supports the intent of the change proposal, however if SVCC codes 34 and 35 were encompassed in the modification, the redlining would in turn need further revision.
British Gas	Yes	
SSE Energy Supply Limited	Yes	
Npower Group PLC	Yes	

Question 3: Will CP1473 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
6	4		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The burden of identification of the Long Term Vacant site is on the Supplier, CP1473 does not propose to change the way in which the Supplier informs the NHHDC to use a 0 EAC or stop using a 0 EAC, therefore, this CP has not impact on our organisation.
STARK	No	
The Renewable Energy Company (Ecotricity)	No	Our organisation will not be impacted by this modification, as the current timeframes do not cater for our meter read cycle, making it implausible for us to enter the LTV process.
Western Power Distribution	No	No direct impact from this change.
Economy Energy	Yes	Systems and automated processes with need to be redeveloped and configured to accommodate the new exception SVCC's. Processes will need to be re documented to reflect this change.
Scottish Power	Yes	Scottish Power will need to carry out system changes should this be implemented. There may also be an impact to FTE should this increase the candidate population as proactive checks will increase from a Supplier perspective.
E.ON Energy Solutions	Yes	There will be some increased processing impacts for the business, monitoring these sites and implementing the process.
British Gas	Yes	There will be a minor change required to our LTV Process to reflect that the additional SVCCs are can be received without resetting the entry process.
SSE Energy Supply Limited	Yes	We believe that if 'No Access' is included in the LTV process there is an increased risk that sites where electricity consumption is being recorded will enter the LTV process, which would constitute a settlements risk.

Respondent	Response	Rationale
Npower Group PLC	Yes	We will need to amend our systems and processes to ensure they take into consideration any additional SVCCs which allow a site to remain in / enter into the LTV process.

Question 4: Will your organisation incur any costs in implementing CP1473?

Summary

Yes	No	Neutral/No Comment	Other
4	6		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	
STARK	No	
The Renewable Energy Company (Ecotricity)	No	As we will be unable to enter the LTV process, no costs should be incurred.
Western Power Distribution	No	
Economy Energy	Yes	1-3 days with the developers @ £600 a day
Scottish Power	Yes	As detailed in question 3
E.ON Energy Solutions	Yes	Increased processing of sites between LTV statuses will have an impact.
British Gas	No	
SSE Energy Supply Limited	No	
Npower Group PLC	Yes	It's likely that we will incur costs to change our system. At this point those costs are unknown.

Question 5: Do you agree with the proposed implementation approach for CP1473?

Summary

Yes	No	Neutral/No Comment	Other
9	1		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We agree with an implementation date of 23/02/2017.
STARK	Yes	
The Renewable Energy Company (Ecotricity)	Yes	We agree with the proposed implementation date.
Western Power Distribution	Yes	
Economy Energy	Yes	The proposed implementation has minimal effect on any current processes that are set up in our systems at the moment and help us to resolve a large number of our failed reads.
Scottish Power	Yes	Yes – February 2017 for implementation
E.ON Energy Solutions	Yes	We agree with the proposed implementation approach and believe the timescales are adequate to achieve the aim of this proposal
British Gas	Yes	We believe that the change can be implemented in a short timeframe. The LTV process is optional for Suppliers so there would not be a compliance risk if a Supplier did not change their current process to allow the additional SVCCs to be received immediately. The NHHDC is already able to process zero EACs for vacant sites.
SSE Energy Supply Limited	Yes	Though we are not supportive of the proposal we do not have any concerns regarding the implementation approach.
Npower Group PLC	No	Some parties will be required to make system changes where they use automated reporting. As such, we would prefer a June 2017 implementation date.

Question 6: Do you consider that any additional SVCC's should be included in CP1473 beyond the four suggested?

Summary

Yes	No	Neutral/No Comment	Other
5	5		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We would suggest the addition of 34 Suspected Demolished and 35 demolished. Obviously they need to trigger a disconnection process once confirmed but in the meantime; a 0 EAC in settlement would be warranted.
STARK	No	The four SVCC included are sufficient to enable a vacant site remains identified whilst keeping some assurances that sites could remain identified incorrectly by having too many options.
The Renewable Energy Company (Ecotricity)	Yes	We understand the reasons as to why these four SVCC's were initially selected, due to the purpose they serve in the current 'Remain' process for a LTV site as they are deemed to not evidence that a site is occupied on an individual basis. We do however believe that this rationale of them not evidencing that a site is occupied can be extended to various other SVCC's for certain circumstances. The SVCC's we believe that this could be extended to are: 04, 26, 37 and 88.
Western Power Distribution	No	We do not believe that any additional SVCC's should be included.
Economy Energy	No	All other SVCC's we get aren't linked to the property being vacant
Scottish Power	Yes	SVCC 34 (suspect demolished) and 35 (Demolished). Whilst these SVCCs highlight that investigation/action needs to be taken, whilst the applicable Supplier arranges for this to be done, these SVCCs do not indicate that there is consumption at the site, and therefore should not remove the candidate LTV site from the process. SVCC 38 (Unable to gain access due to key/code being unavailable) does not indicate that there is any consumption at the site, so again should not remove a candidate site.

Respondent	Response	Rationale
		SVCC 37 (Unmanned) is commonly received for sites that are not UMS, and therefore indicate an issue with the quality of the SVCC from the DR. Whilst action is taken to manage DR accuracy, this SVCC does not indicate that there is consumption at the property, and therefore should not remove the candidate LTV site from the process.
E.ON Energy Solutions	Yes	<p>We propose that SVCC Codes 34 (Suspected Demolished) and 35 (Demolished) should also be added to the list of SVCC codes which would keep a site in LTV status.</p> <p>With SVCC 34, a typical scenario would see a site being fenced off/bricked up, which means field operatives cannot access the site. The site, by nature, would be vacant. In our experience field agents have selected this SVCC code instead of a 02, which has pushed a site out of LTV status.</p> <p>In addition SVCC 35 for a demolished site should be considered in the scope of this proposal. If a site is demolished, it is also technically vacant. There should be no need for a site to come out of LTV process if 35 is selected. We suggest that a further site visit would be required to support the implementation of codes 34 and 35, and we would suggest that there should be no settlement in the interim period for each specific site.</p>
British Gas	Yes	<p>Following the SVG comments we have identified that SVCC '22 – Meter Blocked' is often interpreted as 'No Access' accompanied by the further requirements for a site to enter the LTV process. The accompanying information shows that the site is legitimately vacant and comments from the Site Visit Agent even state that the site is vacant. With this information and the further requirements being met (Two SVCCs 02, no Consumption recorded and proactive attempts) we believe it would be sensible to allow SVCC '22' to be received without resetting the Long Term Vacant entry process too.</p>
SSE Energy Supply Limited	No	
Npower Group PLC	No	We have not identified any additional SVCCs.

Question 7: Do you have any further comments on CP1473?

Summary

Yes	No
1	9

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	
STARK	No	
The Renewable Energy Company (Ecotricity)	Yes	We believe that the current D0004 timeframe of 215 calendar days apart should be extended in order to cater for smaller suppliers with a 6 month read cycle, and to cater for input errors by Meter Reading Agents. With this in mind, we would welcome a maximum qualifying period which is 14 months, as this would align the process with the Industries settlement requirements.
Western Power Distribution	No	
Economy Energy	No	
Scottish Power	No	
E.ON Energy Solutions	No	
British Gas	No	
SSE Energy Supply Limited	No	
Npower Group PLC	No	

Insert CSD Here

Respondent	Location	Comment

Insert CSD Here

Respondent	Location	Comment

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Respondent	Location	Comment

Respondent	Location	Comment