# Final CP Report

# CP1474 'Updating the CoMC processes to facilitate the elective HH Settlement of SMETS Meters'

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## About This Document

This document is the Final Change Proposal (CP) Report for CP1474 which ELEXON has published following the final decision from the Performance Assurance Board (PAB), Supplier Volume Allocation Group (SVG) and Imbalance Settlement Group (ISG) to approve CP1474.

There are 11 parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and approved implementation approach. It also summarises the PAB, SVG and ISG's views on the changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachment A contains the CP1474 proposal form.
- Attachments B to H contain the approved redlined changes to deliver the CP1474 solution.
- Attachment I contains process flow diagrams for the new Change of Measurement Class (CoMC) processes. Please note that these diagrams were produced to aid understanding of the CP1474 processes to support the CP Consultation. These are not enduring documents and should only be viewed in conjunction with the Balancing and Settlement Code Procedures (BSCPs) redlining. In the event of any inconsistencies between the diagrams and the BSCPs, the BSCPs take precedence.



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- Attachment J contains the full responses received to the CP Consultation.



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# 1 Why Change?

## Background

Ofgem published its 'Elective half-hourly settlement: conclusions paper' on 26 May 2016. One of the priority areas identified was CoMC for smart Meters. The conclusions paper notes that improving the current CoMC processes will make it cheaper and faster for domestic and smaller non-domestic customers to electively switch to Half Hourly (HH) Settlement.

Ofgem asked ELEXON and the Master Registration Agreement Service Company (MRASCo) to convene a cross Code working group, to look into the CoMC changes needed to facilitate elective HH Settlement of smart Meters. These changes will apply to:

- Meters that comply with version one of the Smart Metering Equipment Technical Specifications (SMETS1), whether enrolled by the Data Communications Company (DCC) or not; and
- Meters that comply with version two (SMETS2) and higher versions.

ELEXON formed a cross Code working group called the Change of Measurement Class for Smart Meters Working Group (CSMWG), to discuss these changes and develop a solution.

**SMETS1 vs SMETS2**

SMETS1 is the minimum standard a foundation smart Meter must meet to be eligible for adoption by the DCC. SMETS2 Meters are enrolled in the DCC from installation. The main difference between SMETS1 and SMETS2 Meters is the security model they use and their communication method.

### CSMWG discussions

The CSMWG identified that the D0268 'Half Hourly Meter Technical Details' data flow is not suitable for HH Metering Systems with smart Meters. This is because the majority of data items on the D0268 data flow are not relevant for smart Meters (e.g. passwords, communication details and attributes only relevant to complex metering). The CSMWG considered two options in detail for elective HH Metering Systems, with both approaches creating new CoMC processes.

- **Option one** – produce a new Meter Technical Details (MTDs) data flow for Meter Operator Agent (MOA)-to-MOA transfers for elective HH Metering Systems with smart Meters.
- **Option two** – retain a Non Half Hourly Meter Operator Agent (NHHMOA) for elective HH Metering Systems with smart Meters. With this option, the D0150 'Non Half-hourly Meter Technical Details' data flow is used when the Meter is HH.

The proposed MTD data flow developed under the first option was closer to the D0150 data flow than the D0268 data flow. The only key difference was that the smart MTD data flow would not need to include Register details for HH Metering Systems. However, the CSMWG concluded that it would facilitate movement between HH and Non Half Hourly (NHH) if the Register mappings were maintained, as an elective HH Supplier may still want to configure the Time of Use Registers to present data to the consumer. As such, the CSMWG opted to progress the second option and concluded that the D0150 data flow represented the best option for smart Meters (compared to the D0268 data flow or a new data flow). Continuing to use the NHHMOA to maintain the D0150 data flow represented less impact than requiring HH Meter Operator Agents (HHMOAs) to process a D0150 data flow. Option two also results in minimal change for those Supplier and Supplier Agents who do not wish to participate in elective HH Settlement. This is because if a non-participating Supplier gains an elective HH Meter, there is already a NHHMOA appointed and a D0150 data flow. Therefore, the reverse CoMC (HH to NHH) is more streamlined


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than the first option. The group also concluded that the Half Hourly Data Collector (HHDC) would not need to receive MTDs, because the Supplier will be reading the Meter and no MTDs are needed for validation.

## What is the issue?

The existing CoMC processes are not appropriate for smart Meters where the Supplier is responsible for configuring and collecting data from the Meter. The existing processes focus on two scenarios:

- where a physical change of the Metering System is required to facilitate the CoMC, which requires a site visit; and
- where an advanced Meter is installed, requiring an exchange of communication and password details.

Smart Meters can collect both HH and NHH data. Therefore, on a CoMC for a smart Meter, the Supplier (or the Supplier's service provider) will only need to stop collecting meter register readings and start collecting HH Metered Data (or vice versa). As the Supplier, rather than the HHDC, retrieves data from smart Meters, the HHDC does not require MTDs. In addition, the existing D0268 data flow used for HH Metering Systems is not appropriate for smart Meters.



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# 2 Solution

## Approved solution

CP1474 'Updating the CoMC processes to facilitate the elective HH Settlement of SMETS Meters' was raised by ELEXON on 14 October 2016, to progress the solution developed by the CSMWG.

This CP creates new CoMC processes for Metering Systems with smart Meters moved to elective HH Settlement, as per the option recommended by the CSMWG. The key changes are that:

- the NHHMOA will remain appointed when the Meter is settled HH; and
- steps for a Meter exchange are removed.

The Supplier will record the MOA as HH in the Supplier Meter Registration Service (SMRS)[1], but will retain the services of the NHHMOA operationally. The NHHMOA data flows (D0149 'Notification of Mapping Details' / D0150) will be used during the CoMC processes and whilst the Metering System is settled HH.

This change also introduces new terms to differentiate between the existing and the new CoMC processes introduced by this CP. These terms are:

- 'HHDC-serviced Metering System' for the existing CoMC processes which apply to non-SMETS Meters; and
- 'Supplier-serviced Metering System' for the new CoMC processes (introduced by this CP) which apply to SMETS Meters.

To implement these changes, revisions are required to seven BSCPs. A high-level summary of the required changes to each BSCP is outlined below:

- BSCP501 'Supplier Meter Registration Service':
  - introduction of the term 'Supplier-serviced Metering System' into the BSCP; and
  - additional footnote that provides guidance for the Supplier to record the MOA as HH in the SMRS via the D0055 'Registration of Supplier to Specified Metering Point' and D0205 'Update Registration Details' for a Supplier-serviced Metering System when the Meter is settled HH, although the Supplier will retain the services of the NHHMOA.
- BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS':
  - introduction of the terms 'HHDC-serviced Metering System' and 'Supplier-serviced Metering System' into the BSCP;
  - changes to the naming of the existing CoMC processes (for non-SMETS Meters) to note they are for HHDC-serviced Metering Systems;
  - changes to highlight process steps that do not apply for Supplier-serviced Metering Systems;

**HHDC-serviced Metering System**

A 'HHDC-serviced Metering System' is a Metering System where the HHDC is responsible for collecting data directly from the Metering System.

**Supplier-serviced Metering System**

A 'Supplier-serviced Metering System' is a Metering System where the Supplier obtains data from a SMETS compliant Meter, either directly or using a service provider.

[1] The Supplier will record the MOA as HH in the SMRS by setting the 'MOA Type' as 'H' in the D0055 'Registration of Supplier to Specified Metering Point' / D0205'Update Registration Details'.


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- changes to make sending the D0302 'Notification of Customer Details' optional for Supplier-serviced Metering Systems;
- additional process for the current Supplier to collect the final Meter reading on a Change of Supplier (CoS) for Supplier-serviced Metering Systems; and
- new CoMC processes for Supplier-serviced Metering Systems for NHH to HH and for HH to NHH, and in both cases for coincident / non-coincident with a CoS.

- BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS':
  - introduction of the terms 'HHDC-serviced Metering System' and 'Supplier-serviced Metering System' into the BSCP;
  - changes to the naming of the existing CoMC processes (for non-SMETS Meters) to note they are for HHDC-serviced Metering Systems; and
  - new CoMC processes for Supplier-serviced Metering Systems for NHH to HH and for HH to NHH, and in both cases for coincident / non-coincident with a CoS.
- BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS':
  - introduction of the terms 'HHDC-serviced Metering System' and 'Supplier-serviced Metering System' into the BSCP;
  - changes to the naming of the existing CoMC processes (for non-SMETS Meters) to note they are for HHDC-serviced Metering Systems;
  - changes to highlight process steps that do not apply for Supplier-serviced Metering Systems;
  - changes to make the sending of the D0302 optional for Supplier-serviced Metering Systems;
  - new CoMC processes for Supplier-serviced Metering Systems for NHH to HH and for HH to NHH, and in both cases for coincident / non-coincident with a CoS;
  - optional processes for sending the D0302, D0215 'Provision of Site Technical Details', D0303 'Notification of Meter Operator, Supplier and Metering Assets installed / removed by the MOP to the MAP' and D0312 'Notification of Meter Information to ECOES' (unless changes to content);
  - changes to apply NHH timescales to elective HH Metering Systems for MOA activities such as Meter exchanges; and
  - other changes to reflect the Supplier rather than MOA reading and configuring Meters.
- BSCP533 'Appendix B: PARMS Calculation Guidelines':
  - introduction of the term 'Supplier-serviced Metering System' into the Appendix; and



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- notes added to Performance Assurance Reporting and Monitoring System (PARMS) Serials HM11 'Timely Sending of HH MTDs to HHDCs' and HM12 'Missing HH MTDs' that when a D0155 'Notification of Meter Operator or Data collector Appointment and Terms' is received with a Retrieval Method of 'S'[2], it should be excluded from reporting.

- BSCP537 'Appendix 1 Self Assessment Document (SAD)':
  - Introduction of the terms 'HHDC-serviced Metering System' and 'Supplier-serviced Metering System' into the Appendix;
  - changes to Section 9 'HHDC' to identify different process requirements between HHDC-serviced Metering Systems and Supplier-serviced Metering Systems;
  - changes to Section 13 'SVA HHMOA' to identify that they are responsible for HHDC-serviced Metering Systems; and
  - changes to Section 14 'SVA NHHMOA' to identify that they are also responsible for Supplier-serviced Metering Systems (in addition to NHH Metering Systems).

- BSCP537 'Appendix 2 Testing Requirements':
  - introduction of the new DXXXX and DYYYY data flows (introduced by DTC CP 3496 'Changes to support the implementation of the SRAG recommendations') into the Appendix.

**SRAG**

The SRAG was a group established by the BSC Panel to help develop solutions to address small scale Settlement issues related to the balancing arrangements.

## Related Changes

There are a number of other industry changes that also seek to facilitate elective HH Settlement. The table below summarises the current stage of the existing BSC and Master Registration Agreement (MRA) changes which aim to facilitate elective HH Settlement. These changes were raised following recommendations from Ofgem and the Settlement Reform Advisory Group (SRAG).

| Related changes | | |
|---|---|---|
| Change | Change title | Summary |
| CP1469 | Changes to support the implementation of the SRAG's recommendations. | The SVG approved CP1469 on 4 October 2016 (SVG188) for implementation on 29 June 2017. |
| DTC CP 3496 | Changes to support the implementation of the SRAG recommendations. | Data Transfer Catalogue (DTC) CP 3496 is a related DTC change to facilitate CP1469. The MRA Development Board (MDB) approved DTC CP 3496 on 22 September 2016 for implementation on 29 June 2017. |
| CP1466 | Removing SMETS compliant Meters from the scope of BSCP601. | The Panel approved CP1466 on 8 December 2016 (Panel 261) for implementation on 23 February 2017. |

[2] DTC CP 3496 introduces a new Retrieval Method 'S' to indicate that the Supplier, rather than the HHDC, is responsible for retrieving HH Metered Data. D0268 data flows are not expected to be sent for these Metering Systems.



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| Related changes | | |
|---|---|---|
| Change | Change title | Summary |
| CP1475 | Remove obligation to re-date final NHH Meter readings on CoMC | The SVG approved CP1475 on 3 January 2017 (SVG191) for implementation on 29 June 2017. |

**Interaction of CP1474 and CP1469**

CP1474 and CP1469 work together to deliver new processes for the elective HH Settlement of smart Meters. CP1474 creates new CoMC processes for smart Meters. CP1469 introduces new processes for the collection of HH smart Meter data following the CoMC to HH. CP1474 and CP1469 work independently of each other to provide a revised end to end process for the elective HH Settlement of Metering Systems with smart Meters. In the event that CP1474 was not approved, the CP1469 processes could have still been operated. However, the transition from NHH to HH (and any subsequent transition from HH to NHH) would have followed the existing CoMC process. This would have required the use of workarounds because the D0268 cannot be fully populated for smart Meters.

## Proposer's rationale

The changes create new CoMC processes for smart Meters, and streamline the processes. In the new processes there will be no need to change the MOA[1] (it remains NHH) when a smart Meter moves to elective HH Settlement. This streamlines the process for a reverse CoMC (HH to NHH), as a NHHMOA is already appointed. As a NHHMOA is appointed, it is also possible to use existing NHH data flows (D0149 / D0150) and avoids the need to switch to HH MTDs when the Meter is elective HH. Using existing data flows means minimal system changes required for Suppliers or Supplier Agents. These changes will remove barriers to the elective HH Settlement of smart Meters. Ofgem is keen to remove these barriers by early 2017.

## Approved redlining

Attachments B to H contain the approved changes to BSCP501, BSCP502, BSCP504, BSCP514, BSCP533 Appendix B, BSCP537 Appendix 1 and BSCP537 Appendix 2 respectively to deliver CP1474.



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# 3 Impacts and Costs

## Central impacts and costs

CP1474 requires changes to BSCP501, BSCP502, BSCP504, BSCP514, BSCP533 Appendix B, BSCP537 Appendix 1 and BSCP537 Appendix 2. No central system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1474 are approximately £240 (one ELEXON working day) to implement the document changes.

| Central Impacts | |
|---|---|
| Document Impacts | System Impacts |
| • BSCP501<br>• BSCP502<br>• BSCP504<br>• BSCP514<br>• BSCP533 Appendix B<br>• BSCP537 Appendix 1<br>• BSCP537 Appendix 2 | *None* |

## BSC Party & Party Agent impacts and costs

The changes introduced by CP1474 are document changes only. We believe this change will impact Suppliers, NHHMOAs, HHMOAs, HHDCs and NHH Data Collectors (NHHDCs).

The approved solution aims to have minimal impacts on Parties not participating in the elective HH market. More information can be found in the 'CSMWG discussions' section of this document, under section 1 'Why change?'.

| BSC Party & Party Agent Impacts | |
|---|---|
| BSC Party/Party Agent | Impact |
| Supplier | • Creation of new internal processes for smart CoMC |
| NHHMOA | • Creation of new internal processes for smart CoMC |
| HHMOA | • Where an MOA uses the same Market Participant Id (MPID) for its NHHMOA and HHMOA, a D0155 with a Retrieval Method of 'S' should be routed to the NHHMOA system (where different). This could have a minor impact on the HHMOA system. |
| NHHDC | • Clarification of application of existing CoMC process to smart Meters |
| HHDC | • Creation of new internal processes for smart CoMC<br>• Update PARMS software that creates HM11 and HM12 Serials to take into account D0155s with a Retrieval Method of 'S' |



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All 12 respondents to the CP Consultation indicated that CP1474 will impact their organisations, with the majority indicating that system changes would be required. One respondent noted CP1474 will also have a positive impact, by providing a suitable CoMC process for SMETS Meters. Two respondents noted that the full scope of their system changes would be determined through their own internal impact assessments, should the CP be implemented.

One respondent noted that if acting as a non-participating Supplier, their CoS registration processes would be similar, with some changes to their smart gain process. They would also require a small change to the end of their registration process to notify Meter Point Administration Service of the CoMC from HH to NHH where appropriate. The respondent noted that if actively participating in the elective HH process as a Supplier, the changes would be significant as part of the end-to-end elective HH Settlement process.

One respondent noted that as an HHMOA, there would be no impact. Another respondent had a similar view as an MOA, and did not anticipate any large changes to its systems. However, one HHMOA noted significant system changes. The respondent noted that its systems are partitioned based on the market the site operates in. Therefore, the change could be potentially complex.

One respondent noted potentially significant impacts dependent on whether the LDSO would be required to send the D0215 to the MOA. The redlining has been updated to remove references to the D0215 so the respondent now expects only limited impacts.

All 12 respondents also identified costs associated with implementing CP1474 related to the system changes. The respondents outlined the potential on-going cost of the solution, as well as the potential cost of resolving any consequential impacts that have not been identified. One respondent noted that dependant on the take up of elective HH, there could be a cost to requalify HHDC / HH Data Aggregator systems for an increased number of HH appointments.

You can find the full responses received to the CP Consultation in Attachment J.



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# 4 Implementation Approach

## Approved Implementation Date

CP1474 is approved for implementation on **29 June 2017** as part of the June 2017 BSC Systems Release.

The Implementation Date aligns with the process changes for CP1469 and the availability of amended and new data flows that will be created by DTC CP 3496.

This Implementation Date also meets Ofgem's target date for removing barriers to elective HH Settlement by early 2017, as set out in the Ofgem 'Elective half-hourly Settlement: conclusions paper'. Nine of the 12 respondents to the CP Consultation agreed with the proposed implementation approach.

One respondent noted their support for Ofgem's target date to remove barriers to elective HH Settlement. Another respondent supported the Implementation Date but believed it would be challenging. However, the respondent noted the importance of CP1474 for non-participating parties who wish to carry out a reverse CoMC to NHH. Another respondent noted the Implementation Date would be challenging, but they believed it would be achievable provided that any other changes that impact HHDC / HHDAs are scheduled for a later Implementation Date. A further respondent indicated they would require six months to implement the change. Following the decision by ISG on 4 January 2017, ELEXON will issue a communication to the industry to ensure participants are given as much time as possible although this will be slightly under six calendar months.

One respondent believed that the uptake of SMETS in June would be low, and believed that November 2017 would be a better Implementation Date. However, ELEXON notes that at least one Supplier has shared its intention to carry out elective HH Settlement with SMETS Meters in the short term. Without CP1474, the changes implemented by CP1469 would require a workaround to use the existing CoMC processes for elective HH. This would have a negative impact on any Suppliers gaining elective HH Metering Systems that they wished to revert to NHH.



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# 5 Initial Committee Views

## ISG's initial views

The ISG considered CP1474 at its meeting on 25 October 2016 (ISG186/05).

An ISG Member queried why the D0215 data flow from Distributor to MOA is optional in the new CoMC processes. The ISG Member noted that for a NHH to HH CoMC, Distributors would have limited information on the D0215 data flow. The ISG Member expressed concerns that CP1474 is introducing an obligation into BSCP514 that Distributors cannot deliver to MOAs. ELEXON noted that this issue was raised in the CSMWG. However, the CSMWG agreed to keep the sending of the D0215 data from Distributor to MOA, but to make it optional. ELEXON noted that some participants make use of the D0215.

An ISG Member noted there is an assumption that all SMETS compliant Meters can be reconfigured remotely. The ISG Member queried if this assumption was accurate. ELEXON responded that SMETS Meters are required to record 13 months of HH import and six months of HH export data. Therefore, the Supplier only needs to send a service request to the Meter via the DCC for the HH data. ELEXON noted that there is no reconfiguration required to access HH data. ELEXON noted that the data retriever, or DCC, will be able to communicate with the Meter following the CoMC to obtain HH data.

## PAB's initial views

The PAB considered CP1474 at its meeting on 27 October 2016 (PAB189/08).

A PAB Member queried if any of the changes introduced by CP1474 interact with the changes introduced by CP1469. Another PAB Member noted that the changes introduced by CP1469 impact the processes following the completion of the CoMC. Therefore, there is no interaction between CP1474 and CP1469.

A PAB Member asked for clarity on their understanding that the Supplier would collect HH Meter readings and the MOA is recorded as a NHHMOA. ELEXON noted that the appointed MOA would use its NHHMOA MPID but the Meter Type would be set to 'H' for HH. A PAB Member queried if this meant that all NHHMOAs would need to be setup in Market Domain Data (MDD). ELEXON noted that while not all NHHMOAs have HHMOA equivalents, all HHMOAs do have an NHHMOA equivalent. Following the meeting, ELEXON notes that MDD does not distinguish between NHH and HH MOAs. Within MDD, all MOAs are assigned a Market Participant Role Code of 'M' for Meter Operator.

A PAB Member queried if NHHMOAs appointed as part of this process would need to be HH accredited. ELEXON noted that this would not be the case. ELEXON noted that this was on the basis that it is the same Meter installed on site. Therefore, the NHHMOA is responsible for the same physical Meter when the Meter is settled HH. ELEXON added that the NHHMOA might not know when the Meter is settled HH.



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## SVG's initial views

The SVG considered CP1474 at its meeting on 1 November 2016 (SVG189/06).

An SVG Member queried if CP1474 had any dependencies on DTC changes. ELEXON confirmed that there were no DTC changes required by CP1474. However, ELEXON noted that the redlining references two new data flows introduced by approved DTC CP 3496, for which no flow numbers have yet been allocated.

An SVG Member noted that the Implementation Date was being driven by Ofgem's aspirations, rather than participants' required lead times. The SVG agreed that the consultation would draw out participants' views on the achievability of the Implementation Date.

An SVG Member noted that if the NHHMOA does not send MTDs to the HHDC, this may lead the HHDC to misinterpret the process. ELEXON noted that the HHDC will be notified if it is a Supplier-serviced Metering System on appointment[2]. As the HHDC knows it is a Supplier-serviced Metering System, they will not be expecting MTDs. The SVG Member queried how the HHDC will validate data without MTDs. ELEXON noted that the only validation is a maximum permissible energy check, and MTDs are not required for this.

An SVG Member queried if the CSMWG identified any impacts on parties not participating in elective HH Settlement. ELEXON noted that the CSMWG discussed this at length. ELEXON noted that the CSMWG initially looked at creating new MTDs for MOA-to-MOA transfer for elective HH smart Meters. However, this option would have had impacts on non-participating parties. ELEXON noted that the CSMWG opted to progress the option of keeping a NHHMOA appointed as this would have minimal impacts on non-participating parties.



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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 J.

| Summary of CP1474 CP Consultation Responses | | | | |
|---|---|---|---|---|
| Question | Yes | No | Neutral/ No Comment | Other |
| Do you agree with the CP1474 proposed solution? | 10 | 1 | 0 | 1 |
| Do you agree that the draft redlining delivers the intent of CP1474? | 9 | 2 | 1 | 0 |
| Will CP1474 impact your organisation? | 12 | 0 | 0 | 0 |
| Will your organisation incur any costs in implementing CP1474? | 12 | 0 | 0 | 0 |
| Do you agree with the proposed implementation approach for CP1474? | 9 | 2 | 1 | 0 |
| Do you have any further comments on CP1474? | 4 | 8 | n/a | n/a |

## Comments on the CP

In response to the CP Consultation, 11 respondents agreed with CP1474, including one with caveats (this respondent is marked as 'other' in the table above). The respondents noted that the solution simplifies the existing CoMC process for elective HH sites, as well as ensuring minimal change for Parties who do not wish to participate in elective HH Settlement. One Party which answered 'no' to this question, commented that they would agree if their concerns were addresses. ELEXON have responded to their comments by making changes to the redlining for BSCP514 and have informed the respondent of the changes. The respondent agreed they are now in supportive of the solution.

One respondent highlighted the concern that should few or no Suppliers participate in elective HH Settlement, then the costs to implement the CoMC processes, and other elective HH Settlement processes, will lead to unnecessary industry costs. These costs may be passed back onto the customer. However, they noted that if elective HH Settlement is to be progressed, CP1474 is the most appropriate method for the CoMC.

The respondent that agreed with CP1474, but with caveats, outlined four concerns with the proposed process. The respondent disagreed with the approach of recording that the Meter Operator type as "HH" in SMRS, as in reality the MOA is the same NHH agent as before the CoMC, and will be retaining NHH obligations. The respondent suggested that the process should be legitimised at industry level by allowing a Supplier to register a NHHMOA against a Metering System ID, which has a SMETS Meter and is settled HH. ELEXON notes that the CSMWG adopted this approach for pragmatic reasons. A change to the Meter Point Registration System validation rules would have delayed the Implementation Date beyond June 2017. ELEXON also noted that from an MOA perspective, there is no real distinction between NHH and HH for a SMETS Meter. Therefore, it is arguably no more accurate to record a MOA type as NHH rather than HH.



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Secondly, the respondent indicated that they were not convinced that the HHDC will not need the MTDs. The respondent noted that currently, on receipt of a D0268, their HHDC system uses this information to build a Meter into its admin system. This includes populating which physical channels are present in the Meter and against which channel the Measurement Quantity IDs are registered. The respondent queried how HHDC would populate the channels that they expect to receive data against, if they do not receive MTDs. ELEXON notes that for SMETS Meters, the Supplier will send HH consumption data to the HHDC and the Measurement Quantity. The HHDC won't need to know anything about the physical channels. ELEXON notes the HHDC system may need to be modified to expect either Active Import or Active Export data for elective HH Metering Systems, without the need to record physical channel numbers.

Thirdly, the respondent noted that HHDCs may be required to validate consumption data. The respondent noted that without a D0150 / D0149, the HHDC won't be able to validate data. Therefore, the respondent believed it should be a requirement for HHDCs to receive D0150 / D0149s. ELEXON notes that the validation requirements for elective HH were approved as part of CP1469. The only validation check required is that the HH values don't exceed the Maximum Permissible Energy value, as set out in BSCP502. The HHDC doesn't need the MTD to carry this out.

Finally, the respondent noted that in the view of the NHHMOA appointed, the NHHDC is never de-appointed. This means that for any metering activity the MOA will continue to send information flows to a NHHDC which has been de-appointed. ELEXON notes that this will only be an issue if the MOA is required while the Metering System is elective HH (e.g. a change of Meter). In these cases, if the MOA sends a D0150 / D0149 to the NHHDC, the NHHDC could reject the unwanted MTD.

## Comments on the proposed redlining

Nine of the 12 respondents to the CP Consultation agreed that the draft redlining delivers the CP1474 proposed solution. However, one of these respondents also suggested some minor modifications to the redlining. ELEXON's response is detailed in Appendix 2; the redlining was updated where appropriate.

One respondent remained neutral on the proposed redlining, but did make some comments to the proposed changes to BSCP502. The respondent noted that documenting the Supplier as the HH data provider makes BSCP502 unwieldy. They noted that previously, processes for data retrievers and site visit agents have needed no additional documentation. ELEXON notes that data retrieval is part of the Data Collector function, and sub-contracted. However, this is different with the Supplier retrieving the data. This is a new role for Suppliers, and a reduction in the scope of the HHDC role. Therefore, data retrieval requirements need to be more explicit than they have been previously.

Two of the 12 respondents did not support the draft redlining. These respondents made a number of comments on the proposed redlining. ELEXON notes that the proposed changes to the redlining are clarifications, corrections to typographical errors and improvements to the consistency of wording between the different sections of the BSCPs. ELEXON's response is detailed in Appendix 2; the redlining was updated where appropriate.



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# 7 Final Committee Views and Decision

## PAB's final views

The PAB considered CP1474 at its meeting on 15 December 2016 (PAB191/08).

The PAB noted that a number of other Modifications and CPs to facilitate elective HH Settlement have been delayed. However, it was noted that this was not of significant concern for CP1474 given that the changes are not interdependent.

A PAB Member noted that this change represented a blurring of the lines between the HH and NHH markets. The PAB Member noted that the new CoMC processes created under CP1474 use a combination of HH and NHH data flows. The PAB Member was concerned that parties might not have the ability to process these data flows, given that HH and NHH flows might be handled in different systems by some parties. ELEXON noted that the majority of the data flows used within the new CoMC processes were standard flows used in the existing CoMC processes. ELEXON noted that the small number of changes made to the DTC data flows, which CP1474 utilises, but these have gone through impact assessment. These changes to data flows will be implemented by DTC CP 3496, which is a change to facilitate CP1469. The PAB Member noted that while it was primarily standard flows that would be used, it was the use of a mix of HH and NHH data flows that parties' systems may not be able to readily support. The PAB Member noted that some of the data flows required as part of the process might need to be sent from one system, while other flows would need to be sent from another. The Panel Sponsor noted that this would likely not cause any issues for central systems but depending on the design of parties' internal systems, parties' might not be able to process the flows required by the processes set out by CP1474.

A PAB Member noted that there had been a number of Workgroups held to discuss the proposed change. The PAB Member queried if there were Suppliers involved in any of these Workgroup and whether or not these potential issues had been raised through any of these Workgroups. ELEXON noted that the CSMWG held with respect to CP1474 included a mix of Suppliers and Supplier Agents. ELEXON noted that there had been discussion around Supplier systems but that the discussion had focused on the ability of MOA systems to manage the process.

The Panel Sponsor noted that while this process was being introduced to support elective HH Settlement, it may be the case that Suppliers end up inheriting these sites and encountering issues with respect to the required flows.

### Final decision:

The PAB has:

- **AGREED** the amendments to the proposed redlining for BSCP533 Appendix B for CP1474, made following the CP Consultation;
- **APPROVED** the proposed changes to BSCP533 Appendix B, BSCP537 Appendix 1 and BSCP537 Appendix 2 for CP1474;
- **APPROVED** CP1474 for implementation on 29 June 2017 as part of the June 2017 Release; and



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- **NOTED** that CP1466 will also be presented to the SVG for decision on 3 January 2017, and the ISG will make an ex-committee decision on CP1474 on 4 January 2017.

## SVG's final views

The SVG considered CP1474 at its meeting on 3 January 2017 (SVG191/03).

ELEXON highlighted that the Performance Assurance Board's discussed parties' abilities to handle both HH and NHH data flows under the proposed solution. However, ELEXON provided assurance that the CP1474 solution has been developed by industry experts at the CSMWG. An SVG Member noted that industry experts do not always come up with the right solution. ELEXON clarified that under the change process, CP1474 has been sent for consultation allowing parties to express their views. The CP1474 consultation did not highlight any issues with the proposed solution.

An SVG Member questioned how the CoMC process will work for a Supplier gaining an elective HH Metering System, and moving it to NHH. ELEXON clarified that the gaining Supplier will undertake the CoMC, not the outgoing Supplier. The SVG Member added that in terms of processes, BSC Section J 'Party Agents and Qualification Under the Code' does not distinguish between HHMOAs and NHHMOAs. ELEXON clarified that where necessary in the BSCPs, distinction between HHMOAs and NHHMOAs has been included.

An SVG member noted that there is a natural blurring between NHH and HH for SMETS Meters, as the same Meter can collect both NHH and HH readings. Another SVG Member expressed concerns that in practice, the processes may not work due to the mix of HH and NHH data flows. The SVG Chair noted that the rationale to maintain a NHHMOA when the Meter is settled elective HH, was to minimise the impact on Suppliers that are not participating in the elective HH market. The SVG Chair asked the SVG Member if they believed there was a better solution. However, the SVG Member did not feel they were in a position to propose a better solution, and they noted that the SVG has to decide if the proposed solution is better than the baseline.

An SVG Member queried how the new Supplier would identify the correct agents. ELEXON replied that the MOA will remain as the NHH MPID.

The SVG Member that previously expressed concerns, noted that they understood the rationale for the proposal, but was not happy with the solution. The SVG Member added that if the Metering System is HH, a D0268 should be used. Another SVG Member noted that if a D0268 was used, it would be largely blank. The SVG Member noted that Suppliers collect the readings, and the HH data collection process is different to that of traditional HH. ELEXON noted that HHDCs do not need MTDs to validate readings, because they will just be receiving an Active Import or Active Export reading. ELEXON confirmed the only validation check is a maximum permissible energy check, and Meter Technical Details are not required for this.

The SVG Member that had concerns with the solution, concluded that their concerns did not warrant referring the decision to the Panel. Therefore, the SVG Member noted they support CP1474, but requested that their reservations were noted.

The Ofgem representative reinforced the message that the proposed solution was based on the CSMWG's discussions. The Ofgem representative noted that the solution largely focussed on streamlining the CoMC from HH to NHH, to reduce the impact on Suppliers not participating in the elective HH market.



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An SVG Member noted that BSCP502 was not consistent in the inclusion of the D0011 'Agreement of Contractual Terms' in process steps. The SVG Member noted that if the D0011 is not included, an agent would be non-compliant with the BSCP if they rejected an appointment. ELEXON noted that currently BSCP502 does not mention rejection flows, because it is written from the point at which an appointment is accepted. The SVG Member noted that the D0011 had been included in the redlining of BSCP502 in several places, but its inclusion was inconsistent. The SVG Chair noted that the inclusion of the D0011 was not critical to the CP1474 solution, and ensuring the consistency of the D0011 within BSCP502 could be considered as a potential separate change.

### Final decision:

The SVG has:

- **AGREED** the amendments to the proposed redlining for BSCP502, BSCP504, BSCP514 and BSCP533 Appendix B for CP1474, made following the CP Consultation;
- **APPROVED** the proposed changes to BSCP501, BSCP502, BSCP504, BSCP514, BSCP533 Appendix B, BSCP537 Appendix 1 and BSCP537 Appendix 2 for CP1474;
- **APPROVED** CP1474 for implementation on 29 June 2017 as part of the June 2017 Release; and
- **NOTED** that the PAB approved CP1474 on 15 December 2016 and the ISG will make an ex-committee decision on CP1474 on 4 January 2017.

## ISG's final views

The ISG considered CP1474 at its ad-hoc meeting on 4 January 2017 (ISG189/01).

The ISG did not make any comments.

### Final decision

The ISG has:

- **APPROVED** the proposed changes to BSCP537 Appendix 1 and BSCP537 Appendix 2 for CP1474;
- **APPROVED** CP1474 for implementation on 29 June 2017 as part of the June 2017 Release; and
- **NOTED** that the PAB and the SVG approved CP1474 on 15 December 2016 and 3 January 2017 respectively.

## Final decision

The PAB, SVG and ISG have:

- **APPROVED** CP1474 for implementation on 29 June 2017 as part of the June 2017 BSC Systems Release.



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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 | BSC Procedure *(Code Subsidiary Document)* |
| CoMC | Change of Measurement Class |
| CoS | Change of Supplier |
| CP | Change Proposal |
| CPC | Change Proposal Circular |
| CSMWG | Change of Measurement Class for Smart Meters Working Group *(Industry expert group)* |
| CVA | Central Volume Allocation |
| DA | Data Aggregator *(Supplier Agent role)* |
| DC | Data Collector *(Supplier Agent role)* |
| DCC | Data Communications Company *(Licensed industry body)* |
| DTC | Data Transfer Catalogue *(Industry Code Subsidiary Document)* |
| ECOES | Electricity Central Online Enquiry Service *(Industry database)* |
| HH | Half Hourly |
| HHDA | Half Hourly Data Aggregator *(Supplier Agent role)* |
| HHDC | Half Hourly Data Collector *(Supplier Agent role)* |
| HHMOA | Half Hourly Meter Operator Agent *(Supplier Agent role)* |
| ISG | Imbalance Settlement Group *(Industry Panel sub-committee)* |
| MC | Measurement Class |
| MDB | Master Registration Agreement Development Board *(Industry Panel)* |
| MDD | Market Domain Data *(Industry database)* |
| MOA | Meter Operator Agent *(Supplier Agent role)* |
| MOP | Meter Operator *(Supplier Agent role)* |
| MPAN | Meter Point Administration Number |
| MPID | Market Participant Identifier |
| MRA | Master Registration Agreement *(Industry Code)* |
| MRASCo | MRA Service Company *(Code administrator)* |
| MS | Metering System |
| MTD | Meter Technical Details |
| NHH | Non Half Hourly |
| NHHDC | Non Half Hourly Data Collector *(Supplier Agent role)* |



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| Acronyms | |
|---|---|
| Acronym | Definition |
| NHHMOA | Non Half Hourly Meter Operator Agent *(Supplier Agent role)* |
| PAB | Performance Assurance Board *(Industry Panel sub-committee)* |
| PARMS | Performance Assurance Reporting and Monitoring System |
| SMETS | Smart Metering Equipment Technical Specifications *(Industry document)* |
| SMRS | Supplier Meter Registration Service |
| SRAG | Settlement Reform Advisory Group *(Industry expert group)* |
| SSC | Standard Settlement Configuration |
| SSD | Supply Start Date |
| SVA | Supplier Volume Allocation |
| SVG | Supplier Volume Allocation Group *(Industry Panel sub-committee)* |
| WD | Working Day |

## DTC data flows

DTC data flows and data items referenced in this document are listed in the table below.

| DTC data flows | |
|---|---|
| Number | Name |
| D0010 | Meter Readings |
| D0011 | Agreement of Contractual Terms |
| D0012 | Confirmation of the Inclusion of the Metering Point in the Reading Schedules |
| D0036 | Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix |
| D0055 | Registration of Supplier to Specific Metering Point |
| D0149 | Notification of Mapping Details |
| D0150 | Non Half-hourly Meter Technical Details |
| D0151 | Termination of Appointment of Contract by Supplier |
| D0155 | Notification of Meter Operator or Data Collector Appointment and Terms |
| D0205 | Update Registration Details |
| D0215 | Provision of Site Technical Details |
| D0235 | Half Hourly Aggregation Exception Report |
| D0261 | Rejection of Agent Appointment |
| D0268 | Half Hourly Meter Technical Details |
| D0302 | Notification of Customer Details |
| D0303 | Notification of Meter Operator, Supplier and Metering Assets installed / removed by the MOP to the MAP |
| D0312 | Notification of Meter Information to ECOES |



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| DTC data flows | |
|---|---|
| Number | Name |
| D0367 | Smart Meter Configuration 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 |
| 3, 12 | Elective HH Settlement conclusion paper on the Ofgem website | https://www.ofgem.gov.uk/publications-and-updates/elective-half-hourly-settlement-conclusions-paper |
| 3 | SMETS1 policy on the government website | https://www.gov.uk/government/publications/smart-metering-implementation-programme-technical-specifications |
| 3 | SMETS2 policy on the government website | https://www.gov.uk/government/consultations/smart-metering-equipment-technical-specifications-second-version |
| 3 | CSMWG page on the ELEXON website | https://www.elexon.co.uk/group/change-measurement-class-comc-smart-meters/ |
| 3 | D0268 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0268&FlowVers=1&searchMockFlows=False |
| 3 | D0150 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0150&FlowVers=1&searchMockFlows=False |
| 5 | CP1474 page on the ELEXON website | https://www.elexon.co.uk/change-proposal/cp1474/ |
| 5 | D0149 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0149&FlowVers=1&searchMockFlows=False |
| 5, 6, 7 | BSCP page on the ELEXON website | https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/ |
| 5 | D0055 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0055&FlowVers=1&searchMockFlows=False |
| 5 | D0205 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0205&FlowVers=1&searchMockFlows=False |
| 6 | D0302 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0302&FlowVers=2&searchMockFlows=False |



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| External Links | | |
|---|---|---|
| Page(s) | Description | URL |
| 6 | D0215 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0215&FlowVers=1&searchMockFlows=False |
| 6 | D0303 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0303&FlowVers=1&searchMockFlows=False |
| 6 | D0312 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0312&FlowVers=1&searchMockFlows=False |
| 7 | D0155 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0155&FlowVers=1&searchMockFlows=False |
| 7 | DTC CP 3496 page on the MRA website | https://mra.mrasco.com/change/changes-to-support-the-implementation-of-the-srag-recommendations/ |
| 7 | CP1469 page on the ELEXON website | https://www.elexon.co.uk/change-proposal/cp1469/ |
| 7 | SVG188 page on the ELEXON website | https://www.elexon.co.uk/meeting/svg-188/ |
| 7 | CP1466 page on the ELEXON website | https://www.elexon.co.uk/change-proposal/cp1466/ |
| 7 | BSC Panel 261 page on the ELEXON website | https://www.elexon.co.uk/meeting/bsc-panel-259/?from_url=https://www.elexon.co.uk/events-calendar-item/bsc-panel-259/ |
| 8 | CP1475 page on the ELEXON website | https://www.elexon.co.uk/change-proposal/cp1475/ |
| 8, 17 | SVG191 page on the ELEXON website | https://www.elexon.co.uk/meeting/svg-191-2/ |
| 12 | ISG186 page on the ELEXON website | https://www.elexon.co.uk/meeting/isg-186/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-186/ |
| 12 | PAB189 page on the ELEXON website | https://www.elexon.co.uk/meeting/pab189/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-189/ |
| 14 | SVG189 page on the ELEXON website | https://www.elexon.co.uk/meeting/svg-189/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-189/ |
| 16 | PAB191 page on the ELEXON website | https://www.elexon.co.uk/meeting/pab-191/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-191/ |
| 17 | BSC Sections page on the ELEXON website | https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/ |



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| External Links | | |
|---|---|---|
| Page(s) | Description | URL |
| 18 | D0011 page on the MRA website | https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0011&FlowVers=1&searchMockFlows=False |
| 18 | ISG189 page on the ELEXON website | https://www.elexon.co.uk/meeting/isg-meeting-189/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-meeting-189/ |



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# Appendix 2: Consultation comments on redlining and ELEXON response

| Comments on the CP1474 Proposed Redlining | | |
|---|---|---|
| Document & Location | Comment | ELEXON's Response |
| BSCP502 3.2.1 | Why isn't the D0011 or D0261 mentioned here | When BSCP502 was first drafted, the D0011 and D0261 were excluded. This was because the D0011 and D0261 were seen as contractual flows that did not alter the Settlement obligation to ensure that agents were appointed for all relevant Settlement Dates. The industry working group that first developed BSCP514 (a later BSCP) took a different view and thought that the flow requirements should represent industry practice, rather than adopting the 'purist' view taken for BSCP502.<br>There are no references to the D0011 or D0261 anywhere in BSCP502. Whilst there would be no harm in adding them, this change would need to be applied to the whole BSCP. To include them in the smart CoMC process alone would create an inconsistency with the rest of the document. |
| BSCP502 3.2.3 | Why isn't the D0011 or D0261 mentioned here | See above. |
| BSCP502 3.2.3 | The BSCP appears to be inconsistently dealing with the sending of the D0012 to the Supplier.<br>In most business processes the DC does not send a D0012 where the mpan is supplier – serviced. However in Change of Supplier only the sending of the D0012 is optional.<br>Could it be confirmed what the definition of 'optional ' is in the sending of the D0012 in section 3.2.3.<br>Is it optional in the sense that it | There is no need for the HHDC to send a D0012, unless the New Supplier asks to receive them. |


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| Comments on the CP1474 Proposed Redlining | | |
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| Document & Location | Comment | ELEXON's Response |
| | is up to the HHDC/Supplier as whether they send the D0012 for a Supplier Serviced MPAN? Rather than optional due to a particular set of circumstances. | |
| BSCP502 3.2.4.2 | Why isn't the D0261 mentioned here | See above. |
| BSCP502 3.2.4.15 and 3.2.4.16 | This step has only partially been thought through.<br><br>Where the Supplier has chosen to perform validation and estimation, this step is not required at all.<br><br>If the HHDC is performing the estimation on behalf of the Supplier it implies the old HHDC has to provide historic data via the new data flow, this can only be true on the assumption that the site was also an Elective one under the old HHDC. So, should the site have previously been (say) a Profile Class 5 to 8, then the old HHDC should not be bound to provide historic data. Since, in such a case, the old HHDC would not have data available in this format. | 3.2.4.15 and 3.2.4.16 are part of the Change of HHDC process. The assumption is that the Metering System was also elective HH when the old HHDC was appointed. If the site were previously in Profile Class 5 to 8, the old HHDC would only hold HH data for the period during which the Metering System was settled HH and would only be required to transfer history for that period.<br>If the Supplier has notified the HHDC that it will perform validation and estimation, the new NHHDC would not need to request the history. Will add 'As required and …' to 3.2.4.15. |
| BSCP502<br>3.3.3.1 | "Within 10 WD for Supplier-serviced Metering Systems"<br>There is no justification to change the amount of time available to the MOA to send the D0139 whether it is Supplier Serviced or HHDC serviced. This should be removed. | The requirements on HHMOAs are typically more stringent than those on NHHMOAs. This is because the metered energy volumes are higher and the number of Meters served is lower. Under the CP1474 proposal, the MOA will treat all SMETS Meters in the same way, irrespective of whether the Supplier is retrieving NHH register readings or HH interval data. The NHHMOA will remain appointed for elective HH Metering Systems and, by default, will continue to operate to NHH service levels. Having |


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| Comments on the CP1474 Proposed Redlining | | |
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| Document & Location | Comment | ELEXON's Response |
| | | to operate a 'two-speed' process would have a bigger impact on MOAs. Aligning the Supplier-serviced Metering System timescales with the NHH processes rather than the HH processes is less change for the MOA and is consistent with the fact that the metering is unchanged and the energy consumed will remain less than in the mandatory Half Hourly sector. |
| BSCP502<br>3.3.4.4 | As above, please remove the proposed ""Within 10 WD for Supplier-serviced Metering Systems" change. | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP502 3.3.4 | Assume that the use of the term SMETS meter is identical to the term supplier serviced. Why does this section have a different format if this assumption is correct? | Agreed. 'For SMETS-compliant Meters' could be changed to 'For Supplier-serviced Metering Systems'. |
| BSCP502 3.3.9.2 | As per CP1472, is this still true? | Section 3.3.9.2 only applies to multi-feeder sites, so has not been amended as part of CP1474. The CP1472 rules will apply. |
| BSCP502 3.3.10 | Does this need to be split into HHDC serviced and Supplier serviced, this implies the HHDC always collects data when feeders are de-energised | 3.3.10 only applies to multi-feeder sites. De-energised single-feeder sites are covered by 3.3.4. |
| BSCP502 3.3.11 | What is the point of footnote 24? Where there is a COMC only, we would follow section 3.3.12. In footnote 25, we assume the supply start date is the effective date? | Footnote 24 is carried forward from the non-smart CoMC process, which originally applied with and without a concurrent Change of Supplier. Agree that it doesn't apply to 3.3.11 and should be deleted.<br>Yes, effective date of the HHDC should be the same as the supply start date. The footnote adds no value and will be removed. |


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| Comments on the CP1474 Proposed Redlining | | |
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| Document & Location | Comment | ELEXON's Response |
| BSCP502<br>3.3.11.1 | Please add a comment that the D0302 is optional so it is consistent with 3.2.1.1 | 3.3.11.1 states that "The sending of the D0302 is optional". |
| BSCP502<br>3.3.12.1 | Please add a comment that the D0302 is optional so it is consistent with 3.2.1.1 | 3.3.12.1 states that "The sending of the D0302 is optional". |
| BSCP502 3.3.13 | The title should read 'Change of Supplier for Supplier-Serviced Metering System' | Agreed. |
| BSCP502 3.3.13 | Heading is wrong? Should be 'Coincident Change of Measurement Class from HH to NHH and Change of Supplier for Supplier-serviced Metering Systems'? | Agreed. As above. |
| BSCP502<br>3.3.13 | Please change the title to "Coincident Change of Measurement Class from HH to NHH and Change of ~~for~~ Supplier for Supplier-serviced Metering Systems." | Agreed. As above. |
| BSCP502 3.3.15.2 | We believe this section should read 'prior to replacement / reconfiguration' for consistency with other similar sections. | Agreed. |
| BSCP502 3.4.1 | Should the heading not make specific reference to HHDC serviced MS? | The title of 3.4.1 has been changed, as part of approved CP1469, to refer to 'SVA Metering Systems where Half Hourly data is not sourced by the Supplier'. |
| BSCP502 3.4.2 | Please could the situation in which a D0235 is sent by the DA to the DC containing a Supplier-serviced MPAN be clarified?<br><br>The situation may arise in which no MS investigation is required. In this situation the BSCP states that a D0036 should be sent to the HHDA. This would mean an incorrect precision is provided and is inconsistent as the DXXXX is expected for a Supplier-serviced MPAN. | Agreed. A reference to the DXXXX should be included alongside the D0036.<br><br>3.4.3.13 should refer to 'HHDC or Supplier' and 3.4.3.14 should reference '3.4.1 or 3.4.6 as appropriate'.<br><br>As noted, the HHDC can check whether a DXXXX flow has been sent to the HHDA, if necessary. Otherwise, the Supplier and HHDC will have |



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| Comments on the CP1474 Proposed Redlining | | |
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| Document & Location | Comment | ELEXON's Response |
| | Alternatively, if a MS investigation is not required, the drafting of BSCP502 eventually suggests following Section 3.4. This is a little confusing because this is section 3.4.<br><br>The expectation was that where there is an HHDC investigation the process differs dependent on whether the MPAN is Supplier-serviced or HHDC serviced.<br><br>If Supplier-Serviced, the HHDC should consider if it can resolve the issue (for example, it may have been a drop out when compiling the DXXXX to the HHDA) and if it can should send a DXXXX to the HHDA. If the HHDC cannot resolve the issue then the HHDC should inform the Supplier (how?) and the Supplier should carry out the investigation leading to a new DXXXX being sent to the HHDC.<br><br>If HHDC-Serviced we would expect the process to continue as currently with the HHDC liaising, where necessary, with the MOP to resolve ending up with a D0036. | pre-agreed who is validating and estimating. The D0235 is sent to both the Supplier and HHDC, so correction of D0235 exceptions should align with the original collection responsibilities. ELEXON will update the guidance note on 'Exception Reporting in the Half Hourly Market'. |
| BSCP502<br>3.4.3.14 | Please confirm the section that we need to refer to. It is listed as 3.4 | Agreed. As above. |
| BSCP502 3.5 | Should the Proving Test section reference that Proving only needs to be performed for some MS so something like adding 'as required' in the Action box in section 3.5.1.1 and other such sections or alternatively the requirements under CP1472 and 74 need to merged more | CP1474 exempts Measurement Class F and Supplier-serviced Measurement Class G Metering Systems from Proving Tests. CP1472 exempts Metering Systems with integral Meter/outstations and a pulse multiplier of one. Supplier-serviced Metering Systems with |


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| Comments on the CP1474 Proposed Redlining | | |
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| Document & Location | Comment | ELEXON's Response |
| | cohesively | SMETS Meters will be exempted on both counts. |
| BSCP502 3.5.7.16 | Numbering should be 3.2.7.16<br><br>This step has only partially been thought through.<br><br>Where the Supplier has chosen to perform validation and estimation, this step is not required at all.<br><br>If the HHDC is performing the estimation on behalf of the Supplier it implies the old HHDC has to provide historic data via the new data flow, this can only be true on the assumption that the site was also an Elective one under the old HHDC. So, should the site have previously been (say) a Profile Class 5 to 8, then the old HHDC should not be bound to provide historic data. Since, in such a case, the old HHDC would not have data available in this format. | Agreed. Numbering should be 3.2.7.16.<br>If the Supplier has notified the HHDC that it will perform validation and estimation, the new NHHDC would not need to request the history. Suggest adding 'As required and …' to 3.2.7.16. |
| BSCP504 3.3.16 | Please confirm the following process: When there is a CoMC from NHH to HH for a Supplier Serviced System (section 3.3.16 – BSCP504) the NHHDC will know to follow this process by reference to the previous D0150 (Meter Type = S2...) that should have been provided by the MOA and the D0151 (Termination Reason = "MC") that the Supplier provides.<br>Otherwise how will the NHHDC know that it is a Supplier-serviced mpan? | Yes. The NHHDC will know about the CoMC from the Termination Reason of 'MC' in the D0151. The NHHDC will already know that the NHH Metering System is Supplier-serviced, from the Contract Reference in the D0155. |
| BSCP504 3.3.18.11 | In this section there is no Change of Supplier therefore the 3rd paragraph with respect to the supplier adopting the old | Agreed. 3rd paragraph should be deleted. |


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| Comments on the CP1474 Proposed Redlining | | |
|---|---|---|
| Document & Location | Comment | ELEXON's Response |
| | Suppliers SSC. | |
| BSCP504 3.3.19 | It is proposed that where there is a CoMC HH to NHH with CoS, no D0010 would be sent by the gaining supplier as the old supplier, who was settling HH, would not require it. We believe that the gaining supplier should still send the D0010 candidate reading as per P302 requirements and the losing supplier, who chose to settle HH, can ignore it. This way a party who doesn't elect to settle HH does not have to change their gain process for smart metered customers settled NHH. | Agreed. Whilst not needed by the old Supplier, sending the D0010 reduces the changes required to the gaining Supplier's processes. |
| BSCP514 1.1 | Where we reference the relevant MTD dataflow we suggest that the first section should read "For Half Hourly Trading (HHDC-Serviced Metering Systems)". We use this terminology throughout rather differentiating by exception. | Agreed. |
| BSCP514 5.2.1.2 | There is no justification to lengthen the response window for D0261/D0011 to 10 days for Supplier Serviced sites. Please remove<br>"(or within 10 WD for Supplier-serviced Metering Systems)." | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514 5.2.1.3 | There is no justification to lengthen the response window for D0261/D0011 to 10 days for Supplier Serviced sites. Please remove<br>"(or within 10 WD for Supplier-serviced Metering Systems | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514 5.2.2.6 | The current drafting suggests the D0215 is optional. For a new Connection, unlike other processes, we believe a Supplier would require this no matter how the choose to settle the metering system. Whilst this is | The D0215 is sent to the HHMO, rather than the Supplier. The view of the working group was that requesting the D0215 should be optional, as the HHMO would not need the site details |


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| | not material we do believe this is more in keeping with existing New Connections processes under NHH and HH processes. | for Metering Systems in Measurement Classes F and G. The D0215 has been removed from the CoMC process, as this process only changes the Settlement method for a device that is already installed. |
| BSCP514 5.2.4 | Change of Supplier and HHMO. Says There is a new section for a supplier serviced metering system. This reference should be removed – a HHMO is only applicable for mandatory HH which is DC serviced. | The abbreviation MOA is used for Supplier-serviced Metering Systems, where the NHHMOA is fulfilling its functions in respect of a HH Metering System. The abbreviation HHMOA is used for those activities that apply to both HHDC-Serviced and Supplier-serviced Metering Systems. This is clarified in footnote 13, which is the first time that the abbreviation MOA is used. |
| BSCP514 5.2.4.11 | For clarity this step should refer to the New MOA in line with following sections. | Agreed. 'MOA' should read 'New MOA'. |
| BSCP514<br>5.2.4.11 to 5.2.4.14 | A note could be made to clarify that where the Supplier fails to configure the meter within 5 working days that they may choose revert to legacy NHH processes.<br><br>Also where any process involves a CoS we believe a D0367 is required. In keeping with P302 requirements the D0367 acts as an instruction to the MOP to release the D0149/D0150 meter technical details. Whilst the meter may not be reconfigured | As this is a change of HH Supplier, the legacy NHH processes would not apply.<br><br>Our recommended alternative is to re-word the 'Action' column to:<br>"Send Smart Meter Configuration Details.<br>If unable to re-configure the Time of Use registers, or no re-configuration required, the Supplier will notify the existing configuration details, where known.<br>If the Time of Use registers are not configured to a valid Standard Settlement Configuration (as defined in MDD), or the Supplier is unable to determine the current configuration, the Supplier will notify a single rate SSC".<br>The D0367 is already included |


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| | | in 5.2.4.11. Changing 'If New Supplier reconfigures the Time of Use registers' to 'Within 1 WD of configuration or within 1 WD of SSD as applicable' will ensure that the D0367 is always sent, whether the Supplier re-configures or not. |
| BSCP514 5.2.7.8 to 5.2.7.10 | A note could be made to clarify that where the Supplier fails to configure the meter within 5 working days that they may choose revert to legacy NHH processes.<br><br>Also where any process involves a CoS we believe a D0367 is required. In keeping with P302 requirements the D0367 acts as an instruction to the MOP to release the D0149/D0150 meter technical details. Whilst the meter may not be reconfigured | As this is a change of HH Supplier, the legacy NHH processes would not apply.<br>Our recommended alternative is to re-word the 'Action' column to:<br>"Send Smart Meter Configuration Details.<br>If unable to re-configure the Time of Use registers, or no re-configuration required, the Supplier will notify the existing configuration details, where known.<br>If the Time of Use registers are not configured to a valid Standard Settlement Configuration (as defined in MDD), or the Supplier is unable to determine the current configuration, the Supplier will notify a single rate SSC".<br>The D0367 is already included in 5.2.7.8. Changing 'If New Supplier reconfigures the Time of Use registers' to 'Within 1 WD of configuration or within 1 WD of SSD as applicable' will ensure that the D0367 is always sent, whether the Supplier re-configures or not.<br>Change 5.2.7.9 from 10 WD to 5 WD for consistency with HHDC-serviced timescales and 5.2.4.13. |
| BSCP514 5.3.1.2 | Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. | See response to comment on BSCP502 3.3.3.1 above. |


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| | Please remove:<br>(or 5 WD for Supplier-serviced Metering Systems). | |
| BSCP514 5.3.1.4 | Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove:<br>"(or within 10 WD for Supplier-serviced Metering Systems)" | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514 5.3.1.6 | Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove:<br>"(or within 10 WD for Supplier-serviced Metering Systems)" | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514 5.3.2.2 | Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove:<br>(or 5 WD for Supplier-serviced Metering Systems). | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514 5.3.2.7 | Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove:<br>"(or within 10 WD for Supplier-serviced Metering Systems)" | See response to comment on BSCP502 3.3.3.1 above. |
| BSCP514<br>7.5 and 7.6 | Parties must populate the J0483 data item "Meter Type" with the NHH meter description, i.e. the SMETS version and variant data value, NOT the "H" Half Hourly data value. We would therefore suggest some narrative is | Agreed. Footnote added. |


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| | included within the BSCP514 to this effect as an additional footnote. Data Item J0483 is included on the following flows relevant to BSCP514:<br>D0150 – Meter Technical Details<br>D0312 – Notification of Meter Information to ECOES<br>D0367 – Smart Meter Configuration Details | |
| BSCP514 7.6.3 | Please change the timescales to 2 WD. If appointment accepted and within 5 WD of 7.6.1. | The timescales are consistent with the non-SMETS CoMC process. CP1474 does not seek to reduce the timescales of the CoMC process and tries to avoid participants having to operate to different timescales depending on the type of Meter installed. |
| BSCP514<br>7.6.7 & 7.8.7 | New process steps – "Coincident CoMC from NHH to HH and CoS for Supplier Serviced Metering Systems" – Step 7.6.7 and process diagram "NHH to HH (concurrent Change of Supplier)" together with "Coincident CoMC from HH to NHH and CoS for Supplier Serviced Metering Systems" – Step 7.8.7 and process diagram "HH to NHH (concurrent Change of Supplier)" states that a New MOA has an option to send a D0170 to the LDSO requesting Site Technical Details. We do not believe that these steps are required as we can see no reason why an MOA would need to obtain site technical details when they are simply altering the settlement method for a device that is already installed. In any case, should they need the information, it should be obtained from the previous MOA not from the LDSO. Although it is an optional step for the MOA, | Agreed. References to the D0215 have been removed. |


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| | if it is sent it is mandatory for an LDSO to respond with a D0215 to every D0170 request received. Therefore we reject this element of the modification as we see it serving no purpose. | |
| BSCP514 7.8 | A note could be made to clarify that where the Supplier fails to configure the meter within 5 working days that they may choose revert to legacy NHH processes.<br>Also where any process involves a CoS we believe a D0367 is required. In keeping with P302 requirements the D0367 acts as an instruction to the MOP to release the D0149/D0150 meter technical details. Whilst the meter may not be reconfigured | The legacy NHH processes, as applied to the NHH CoS process, would not apply on CoMC (for example, reverting to requesting the reading history).<br>Will move the 'backstop' process from 7.8.12 to 7.8.11 and reword to:<br>"If unable to re-configure the Time of Use registers within 5 working days, or no re-configuration required, the Supplier will notify the existing configuration details, where known".<br>On the second point, the 'when' column should be changed to 'Within 1 WD of configuration or within 1 WD of SSD as applicable' in line with the NHH CoS process for smart Meters. |
| BSCP533 Appendix B 3.3.6 | On page 43 there is reference to the D0286 rather than the D0268 dataflow | Agreed. D0286 should read D0268. |
| BSCP533 App B P45 | Correct 286 to 268 in "<br>Registrations and missing D02~~8~~68s in respect of Metering Systems for which an accepted D0155 with a Retrieval Method (J0098) of 'S' (Supplier sourced Half Hourly smart meter readings) has been received." | Agreed. Corrected although we believe this comment was in reference to page 43. |
| BSCP533 Appendix B 3.3.7 | As above, on page 48. | Agreed. D0286 should read D0268. |
| BSCP533 App B P48 | Correct 286 to 268 in<br>" D02~~8~~68s received in respect of Metering Systems for which an accepted D0155 with a Retrieval | Agreed. Corrected. |


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| | Method (J0098) of 'S' (Supplier sourced Half Hourly smart meter readings) has been received. " | |
| BSCP533 Appendix B 3.4.4 | We do not believe the drafting of the exclusion is particularly clear. In keeping with other exclusions perhaps it should be made clear "If a D0155 has been received and the Retrieval Method is 'S'…" it should be excluded from the reporting. | The exclusion in 3.4.4 reads 'Not required, as identified by an accepted D0155 with a Retrieval Method (J0098) of 'S' (Supplier sourced Half Hourly smart meter readings)'. |



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