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

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
British Gas	1 / 0	Supplier
EDF Energy	6 / 0	ECVNA, Generator, MVRNA, Supplier, Supplier Agent
E.ON Energy Solutions	1 / 0	Supplier
IMServ Europe	0 / 1	Supplier Agent
Npower Group PLC	6 / 0	Supplier, Supplier Agent
OVO Energy	1 / 0	Supplier
ScottishPower	0 / 1	Supplier Agent
Siemens Managed Services	0 / 1	Supplier Agent
SSE Energy Supply Limited	1 / 1	Supplier, Supplier Agent
Stark Software International Ltd	0 / 1	Supplier Agent
TMA Data Management Ltd	0 / 1	Supplier Agent
Western Power Distribution	4 / 0	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✓	✓	✓
EDF Energy	✓	✓	✓	✓
E.ON Energy Solutions	✓	✓	✓	✓
IMServ Europe	✓	✓	✓	✗
Npower Group PLC	✓	✓	✓	✗
OVO Energy	✓	✓	✓	✓
ScottishPower	✓	✓	✓	✓
Siemens Managed Services	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✓	✓
Stark Software International Ltd	✓	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	-
Western Power Distribution	✗	✓	✓	✓

Question 1: Do you agree with the CP1474 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	1	0	1

Responses

Respondent	Response	Rationale
British Gas	Yes	We believe the solution will keep change to a minimum for parties who do not wish to operate in the Elective HH market.
EDF Energy	Yes	We do support the changes proposed under CP1474 but we are concerned that should few, or no suppliers, participate in Elective Half Hourly Settlement (EHHS) then the costs to implement the Change of Measurement Class (CoMC) processes, and other EHHS processes, will lead to unnecessary industry costs which may be passed back to the customer. The costs to implement EHHS processes are likely to be significant therefore Suppliers and HH Agents may be put off from participating in a temporary HH process that is likely to be vastly different under mandatory half hourly settlement. However should EHHS be progressed we believe CP1474 is the most appropriate method for the CoMC to be carried out. This is because we believe the principal of EHHS should be that minimal changes are required to the metering system, the main difference is how consumption is recorded. As such should there be no change to the metering system the only thing to carry out EHHS that should change is the appointment and use of DC and DA agents. Similarly on CoS as configuration of the smart meter would be no different to that proposed under P302, the Supplier would decide whether to appoint and use NHH or HH DC and DA agents as appropriate.
E.ON Energy Solutions	Yes	The streamlined CoMC process for remotely read smart metering systems removes the need for a meter operator to change or amend technical information; it also ensures that certain data items

Respondent	Response	Rationale
		that the Mop hold as NHHMoA are not lost when moving to HH settlement. This in turn provides flexibility for suppliers to choose to elect to settle HH & suppliers who do not choose to settle HH, can still register sites that are elective HH, with some confidence that the underlying metering information will not be lost when moving between the 2 methods of settlement.
IMServ Europe	Yes	This seems a reasonable solution for HH elective sites.
Npower Group PLC	Yes (with caveats)	Generally yes but we do have a few reservations about the way in which this process is being proposed Firstly it is being suggested that the Meter Operator type should be recorded as "HH" in SMRS even though in reality the MOP is the same NHH agent as before the CoMC and will be retaining NHH obligations. We do not agree with this approach. This process should be legitimised at industry level by allowing a supplier to register a NHHMOA against an MPAN which has a SMETS meter and is settled HH. Knowingly registering a NHHMOA as HH feels like a "work-around" option which is not the position we should be starting from. We are also not convinced that the HHDC will not need the MTDs. Currently on receipt of a D0268 our 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 MQIs are registered. If HHDC do not receive MTDs how do they populate the channels that they expect to receive data against? When they receive the data on the "new elective flows" this will not populate into the system as HHDC will not have been able to build a meter into the system. It is also likely that a supplier will wish to "outsource" the data validation of meters to a HHDC. Currently a HHDC will not be able to receive a D0150/D0149 and without this will not be able to validate data. This will make it impossible for a HHDC to validate the data. We believe the HHDC will require MTDs and that the change should include this and a requirement for HHDCs to be able to receive D0150/D0149s.

Respondent	Response	Rationale
		Also, in the view of the NHHMOA appointed, the NHHDC is never de-appointed. This means that for any metering activity the MOP will continue to send information flows to a NHHDC which has been de-appointed.
OVO Energy	Yes	The proposed solution simplifies the existing Change of Measurement Class (CoMC) process in a manner suitable for smart meters. Fundamental to the rationale underpinning the proposal is that smaller smart metered sites have more in common with the non-half hourly than the half-hourly market. We agree with this rationale, as traditional half hourly market processes and regulations were designed with larger industrial and commercial sites in mind. The following is our understanding of the core qualitative elements of the change: 1. The non-half hourly Meter Operator Agent (MOA) does not need to be de-appointed for smart metered sites, with non-half hourly rather than half hourly meter technical details preserved in meter operator systems. 2. No meter exchange (actual or 'cosmetic') takes place, in recognition that site assets are unchanged where a smart meter is already present. 3. The role of the half hourly data collector is reduced significantly. We agree with element 1) in that preserving non-half hourly meter operator and meter technical details means that agents principally active in the domestic sector will not require additional accreditation. Continuity in meter technical details is suitable since no change to physical assets takes place. Element 2) is evidently sensible where there is no physical change to on-site assets. The existing requirement originates in P272 and was never developed for smart meters. Finally, the reduction in responsibilities for the Half Hourly Data Collector (HHDC) - reduced validation requirements, flow handoffs and involvement in the opening read

Respondent	Response	Rationale
		process - correctly reflect the 'thinner' role of the HHDC in the case of supplier-serviced smart meters. For these meter points, the data retrieval role is fulfilled by SMSO or DCC, with validation requirements placed on the supplier. DC involvement in the CoMC process is limited to the minimum required to fulfil these reduced duties. For the reasons above we believe that the solution proposed in CP1474 is suitable.
ScottishPower	Yes	Yes, agree with the proposed solution
SSE Energy Supply Limited	Yes	The proposed solution appears to be the most pragmatic method of managing a change of measurement class for SMETS meters entering or leaving the Elective HHS market. It should be good enough to meet the basic requirements without disrupting suppliers that do not wish to enter the Elective HHS market, or creating a disincentive for those who do enter the market. It is also significantly lower cost than the original suggestion of creating a new MTD flow process. We recognise that as plans to progress Mandatory HHS develop, areas such as Change of Measurement Class and more broadly Agent roles, may change. Subject to the development of Mandatory HHS, we do not necessarily view this as an enduring solution but it should work for the foreseeable future.
Siemens Managed Services	Yes	We would agree that the alternative proposed solution detailed in CP1474 has a greater chance of meeting the proposed June 2017 Implementation date than the originally suggested solution that was more complex and would involve significantly more development work to enable a fully MOA CoMC for Elective HHS. This solution is simpler and it addresses the question of how to transfer the MTD if the mpan reverts from Elective HHS to NHHDC, this was an issue that was not satisfactorily resolved by the original working group proposal.
Stark Software International Ltd	Yes	Allowing NHH MOP to operate HH meters seems to be a pragmatic way to streamline CoMC for SMETS
TMA Data Management Ltd	Yes	-

Respondent	Response	Rationale
Western Power Distribution	No	We would agree with the proposed solution if the following was addressed. 1. 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 included within the BSCP514 to this effect as an additional footnote. Data Item J0483 is included on the following flows relevant to BSCP514: D0150 – Meter Technical Details D0312 – Notification of Meter Information to ECOES D0367 – Smart Meter Configuration Details 2. 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, 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.

Question 2: Do you agree that the draft redlining delivers the CP1474 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	2	1	0

Responses

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

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	No	To a large extent the drafting does deliver the intent of the proposed solution, however having participated and contributed to the CoMC Smart Metering Working Group (CSMWG) we believe there are a few anomalies in the drafting which when amended would lessen unintended impact on parties involved. These changes would bring the solution in line with existing processes for NHH metering points proposed under P302 of which we understand was the intention of the proposal. Further details are provided at the end of our response.
E.ON Energy Solutions	Yes	-
IMServ Europe	No	Please see our comments below in the red line sections
Npower Group PLC	Yes	-
OVO Energy	Yes	-
ScottishPower	Yes	We agree that the draft redlining delivers the CP1474 proposed solution
Siemens Managed Services	Yes	In principle we agree. However there appear to be a number of minor modifications required against the relevant BSCP that we highlighted below in the CP Redlined Text section.
SSE Energy Supply Limited	Yes	-
Stark Software International Ltd	Yes/No	Please see Qu 6. Fewer essential changes are actually needed to BSCP502.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Please see comments on the details of the drafting.
Western Power Distribution	Yes	Subject to our comments in Q1.

Question 3: Will CP1474 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
12	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	There will be a significant impact to our organisation to be able to serve customers who Elect to be HH. A full system impact assessment would have to be completed to understand impacted systems and costs.
EDF Energy	Yes	As a Supplier we would be required to make changes to our residential/SME systems and processes whether we participate in EHHS or not. We do not expect system changes for our large commercial systems but there would be process changes to identify EHHS customers and HH customers in Measurement Class F and G to ensure customers are quoted and registered correctly. As a non-participating Supplier (through residential/SME systems): · We'd expect most of our CoS registration processes to be similar however this is subject the D0367 becoming mandatory on CoS, and also the D0010 being required to be sent on HH to NHH CoMC with CoS. Should this not change we'd anticipate further changes to our Smart gain process as this is in our current build following implementation of P302. · A small change would be required to the end of our registration process to notify MPAS of the change in Measurement Class from HH to NHH where appropriate. As a participating Supplier we'd expect significant changes to be required as part of the end-to-end EHHS process. With respect to the CoMC process: · CoS registration processes will be amended so agents are notified of a EHHS metering system · New processes required to trigger NHH to

Respondent	Response	Rationale
		HH CoMC for existing customers. · Enhancements required to enable triggering of the reverse CoMC for relevant events, for example Change of Tenancy or change in customer consent with respect to consumption data. · A further change would be required for new CoMC processes to notify MPAS of the change in Measurement Class from HH to NHH and vice versa. As a MOP and Supplier we'd require changes to data transfer systems to accommodate changes to the 'Retrieval Method' data item. As a MOP, subject to the drafting comments we have made, we would not anticipate large scale change required in our MOP systems. If we've interpreted the solution correctly most processes should following existing NHH processes. However should changes to make the D0367 mandatory not be made this would increase the level of change required.
E.ON Energy Solutions	Yes	Yes, there will be a number of changes to systems and processes.
IMServ Europe	Yes	Potentially as HHDC we are unlikely to be operating in the Elective HH market so will be unaffected by this CP. We have made some comments on the red line BSCP502 to ensure we have the ability to reject appointment flows via use of the D0261 since this activity is not mentioned at all As HHMO, this is a significant change to our systems which is currently partitioned based on the market the site operates in. This makes such a change a fundamental and potentially complex redesign. We are unsure whether we yet have enough information describing what the full solution needs to support, in order to quantify the impact of this change.
Npower Group PLC	Yes	Yes. As a NHHMOP and a HHDC we will have to implement the new processes into BAU operational process. There will also be system changes required as there is different logic in flow routing. For example, currently whenever a D0367 is received, a D0150/D0149 is sent to the NHHDC. In

Respondent	Response	Rationale
		the current proposal this is no longer required and system changes will need to be made to prevent this. We will also need to make extensive changes to our supplier systems.
OVO Energy	Yes	CP1474 will positively impact us as a supplier by providing a suitable means for changing the measurement class of a smart-metered site. Some development will be required in order to implement the new process.
ScottishPower	Yes	As a HHMOA there will be no impact. From a HHDC perspective system changes are required and we are in the process of implementing IT changes for June 2017 Release
Siemens Managed Services	Yes	We expect to have to make changes to systems, process & documentation; these will impact NHHDC and HHDC and MOA roles. To date these changes have yet to been fully scoped. This will constitute a major part of the detailed Impact Assessment that will be undertaken if this CP approved.
SSE Energy Supply Limited	Yes	The level of impact is acceptable, irrespective of whether we participate in the Elective HHS market.
Stark Software International Ltd	Yes	Changes will be needed to the appointment process. Namely removal of the expectation to receive MTDs where D0155s has a Retrieval Method of 'S'. Likewise changes to PARMS reporting where Retrieval Method of 'S' Changes needed to the appointment process. Although not directly imposed by CP1474, there would need to build processes to expect and load HH data from the Supplier or his representative.
TMA Data Management Ltd	Yes	Our systems and processes will be greatly impacted by CP1474 for our HHDC and NHHDC functions.
Western Power Distribution	Yes	The impact on our current systems and process could be considerable if the MOA sends a D0170 for a Supplier Serviced Metering System on CoMC as the LDSO is mandated to respond with a D0215. If MOA's opted to send a D0170 in these circumstances there would be a significant increase in the volume of D0215 flows an LDSO will have to send which we would consider to be unnecessary. If this element were to be removed the impact on our systems and processes would be limited.

Question 4: Will your organisation incur any costs in implementing CP1474?

Summary

Yes	No	Neutral/No Comment	Other
12	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	We are unable to provide cost for implementation of CP1474, but to deliver a full EHHS solution would be significant. The majority of the costs for implementing EHHS would be for new interfaces and workflows to collect HH data from the smart meter and to pass onto the HHDC. As outlined in answer to question 4 changes would be required whether participating in EHHS or not but we would expect these to be a medium level of change.
E.ON Energy Solutions	Yes	Costs of implementing changes to systems and processes will not be inconsiderable, but we believe the work groups proposals have to some extent managed to mitigate the impacts.
IMServ Europe	Yes	Potentially – As HHDC, even though we may not be operating in the Elective HH market, we will still incur some costs in developing our systems to allow us to reject Supplier appointments via a D0261 flow, for example. This will be a one off development cost. This is likely to be a fairly minor development and testing effort. As HHMO, it is difficult to assess the one off cost but as stated this is likely to be significant. Ongoing costs could also be higher should the process fail to work as described or should there be consequential impacts not yet identified or evidenced.
Npower Group	Yes	All process and system changes incur costs. Our initial view is that the impacts of this CP will see

Respondent	Response	Rationale
PLC		changes required to multiple systems incurring significant costs.
OVO Energy	Yes	There will be some costs incurred in development of internal processes from both a supplier and MOA point of view. We do not expect these costs to be substantial.
ScottishPower	Yes	Unable to confirm at this stage.
Siemens Managed Services	Yes	There will be one-costs to modify HHDC/DA systems. In addition, and dependant on take up of Elective HHS there will be FTE effort and cost to requalify systems for increased number of HH appointments. Other possible costs may accrue from the additional infrastructure required to support an increase in data volumes.
SSE Energy Supply Limited	Yes	We anticipate the costs should be relatively minor to implement.
Stark Software International Ltd	Yes	Yes in conjunction with the impacts mentioned above. Costs would be of the order of 2 man months.
TMA Data Management Ltd	Yes	There will be medium to high one off costs for development, testing and implementation as well on-going costs to follow the different processes.
Western Power Distribution	Yes	Although automated where possible there is inevitably some manual intervention required when processing large volumes of D0170's therefore if the MOA's have an option to send this flow we will incur cost in processing them.

Question 5: Do you agree with the proposed implementation approach for CP1474?

Summary

Yes	No	Neutral/No Comment	Other
9	2	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
EDF Energy	Yes	It would be extremely challenging to deliver the full EHHS requirements by June 2017. We do believe CP1474, as opposed to other alternatives, does lessen the impact on all parties, particularly those who may not elect to settle half hourly. This is increasingly important should parties be required to carry out a reverse CoMC process when gaining a supply that was previously settled HH and have this in place by June 2017.
E.ON Energy Solutions	Yes	-
IMServ Europe	No	As HHDC, we don't have any major issue with a June implementation. As HHMO, as stated above, we are unsure of our ability to deliver to such a short deadline. We also speculate that the demand for this service will be very low in June since progress in the SMETS arena has been and continues to be very slow. We would rather take a more considered approach rather than rushing to develop something that would not be needed in June and November seems a better choice given this.
Npower Group PLC	No	We agree with the intention of this CP and the idea that avoiding a CoMC will be more desirable. However, we feel that a number of assumptions have been made in the design of this process that if wrong, have the potential to completely stall the process (particularly around the data the HHDC receives and the interaction between the MOA and

Respondent	Response	Rationale
		HHDC).
OVO Energy	Yes	We fully support Ofgem's aim in seeking to deliver elective half hourly settlement capability in H1 2017, and think that the June implementation date leaves sufficient time for internal development and testing.
ScottishPower	Yes	Please see our response to question 1
Siemens Managed Services	Yes	We believe that the timescales for implementation are challenging but achievable provided that any further Changes to HHDC/DA are scheduled for a later Implementation date.
SSE Energy Supply Limited	Yes	We accept that this change proposal should be implemented alongside the key Elective HHS proposals in June 2017.
Stark Software International Ltd	Yes	Yes but a clear 3 months' notice would be required.
TMA Data Management Ltd	-	We require 6 months lead time between approval and implementation. A 29th of June implementation may or may not provide us with that amount of lead time depending on a potential approval date.
Western Power Distribution	Yes	-

Question 6: Do you have any further comments on CP1474?

Summary

Yes	No
4	8

Responses

Respondent	Response	Comments
British Gas	No	-
EDF Energy	No	-
IMServ Europe	No	-
E.ON Energy Solutions	Yes	Delays on other industry changes (notably DCP 268) mean that barriers will still exist post implementation date.
Npower Group PLC	No	-
OVO Energy	Yes	We strongly support the timely implementation of CP1474, as shortcomings in the existing change of measurement class process are one of the largest remaining barriers to elective half-hourly settlement. CP1474 correctly acknowledges that the smart-metered half hourly settlement is better thought of as an extension of the non-half hourly market than the traditional half hourly market. Engagement with elective half hourly settlement requires that access to the market is straightforward for suppliers and agents who may have been principally active in the non-half hourly sector.
ScottishPower	No	No further comments
Siemens Managed Services	Yes	We have no further comments on the CP. However we have a number of comments and questions relating to the drafting of several of the BSCPs. Please see below.
SSE Energy Supply Limited	No	-
Stark Software International Ltd	Yes	It's unfortunate the SRAG recommendations are being authorised and applied in such a piecemeal way across multiple CPs when they are so closely aligned.

Respondent	Response	Comments
		As mentioned in our CP1469 response, having to document the prospect of Supplier as the provider of HH data makes BSCP502 unnecessarily unwieldy but is similar to the role already carried out by retrievers and site visit agents that, to date, has not needed any additional documentation at all. The sending of Retrieval Method of "S" is more or less all that is required as far as HHDC is concerned. The scenario of Supplier representatives and HHDCs having their own DCC interface has not been allowed for (but again as above perhaps is not needed either). Fault raising and validation duties of both HHDC/Supplier remain unclear.
TMA Data Management Ltd	No	-
Western Power Distribution	No	-

BSCP502

Respondent	Location	Comment
EDF Energy	3.3.13	The title should read 'Change of Supplier for Supplier-Serviced Metering System'
EDF Energy	3.3.15.2	We believe this section should read 'prior to replacement / reconfiguration' for consistency with other similar sections.
IMServ Europe	3.2.1	Why isn't the D0011 or D0261 mentioned here
IMServ Europe	3.2.3	Same comment
IMServ Europe	3.2.4.2	Why isn't the D0261 mentioned here
IMServ Europe	3.2.4.15 and 16	This step has only partially been thought through. Where the Supplier has chosen to perform validation and estimation, this step is not required at all. 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.
IMServ Europe	3.2.7.2	Same comment as 3.2.4.2
IMServ Europe	3.5.7.16	Numbering should be 3.2.7.16 Also, same comment as 3.2.4.16
IMServ Europe	3.3.9.2	As per CP1472, is this still true?
IMServ Europe	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
IMServ Europe	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'?

Respondent	Location	Comment
IMServ Europe	3.4.1	Should the heading not make specific reference to HHDC serviced MS?
IMServ Europe	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 cohesively
Siemens Managed Services	Section 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?
Siemens Managed Services	section 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?
Siemens Managed Services	section 3.2.3	The BSCP appears to be inconsistently dealing with the sending of the D0012 to the Supplier. 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. Could it be confirmed what the definition of 'optional ' is in the sending of the D0012 in section 3.2.3. Is it optional in the sense that it 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.
Siemens Managed Services	BSCP502 Section 3.4.2 – HHDC investigates inconsistencies	Please could the situation in which a D0235 is sent by the DA to the DC containing a Supplier-serviced MPAN be clarified? 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. Alternatively, if a MS investigation is not required, the drafting of BSCP502 eventually suggests following Section 3.4. This is a little confusing

Respondent	Location	Comment
		because this is section 3.4. The expectation was that where there is an HHDC investigation the process differs dependent on whether the MPAN is Supplier-serviced or HHDC serviced. 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. 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.
TMA Data Management Ltd	3.3.3.1	"Within 10 WD for Supplier-serviced Metering Systems" 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.
TMA Data Management Ltd	3.3.4.4	As above, please remove the proposed ""Within 10 WD for Supplier-serviced Metering Systems" change.
TMA Data Management Ltd	3.3.11.1	Please add a comment that the D0302 is optional so it is consistent with 3.2.1.1
TMA Data Management Ltd	3.3.12.1	Please add a comment that the D0302 is optional so it is consistent with 3.2.1.1
TMA Data Management Ltd	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."
TMA Data Management Ltd	3.4.3.14	Please confirm the section that we need to refer to. It is listed as 3.4

BSCP504

Respondent	Location	Comment
EDF Energy	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.
EDF Energy	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 Suppliers SSC.
EDF Energy	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. 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
EDF Energy	5.2.7.8 to 5.2.7.10	As above.
EDF Energy	7.8	As above.
Siemens Managed Services	section 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. Otherwise how will the NHHDC know that it is a Supplier-serviced mpan?

BSCP514

Respondent	Location	Comment
EDF Energy	1.1	Where we reference the relevant MTD dataflow we suggest that the first section should read "For Half

Respondent	Location	Comment
		Hourly Trading (HHDC-Serviced Metering Systems)". We use this terminology throughout rather differentiating by exception.
EDF Energy	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 not material we do believe this is more in keeping with existing New Connections processes under NHH and HH processes.
EDF Energy	5.2.4.11	For clarity this step should refer to the New MOA in line with following sections.
Siemens Managed Services	Section 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.
TMA Data Management Ltd	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 "(or within 10 WD for Supplier-serviced Metering Systems)."
TMA Data Management Ltd	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 "(or within 10 WD for Supplier-serviced Metering Systems
TMA Data Management Ltd	5.3.1.2	Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove: (or 5 WD for Supplier-serviced Metering Systems).
TMA Data Management Ltd	5.3.1.4	Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove: "(or within 10 WD for Supplier-serviced Metering Systems)"
TMA Data Management Ltd	5.3.1.6	Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove: "(or within 10 WD for Supplier-serviced Metering Systems)"
TMA Data	5.3.2.2	Again, there is no justification for allowing different

Respondent	Location	Comment
Management Ltd		timescales (longer) for the Supplier Serviced meters. Please remove: (or 5 WD for Supplier-serviced Metering Systems).
TMA Data Management Ltd	5.3.2.7	Again, there is no justification for allowing different timescales (longer) for the Supplier Serviced meters. Please remove: "(or within 10 WD for Supplier-serviced Metering Systems)"
TMA Data Management Ltd	7.6.3	Please change the timescales to 2 WD. If appointment accepted and within 5 WD of 7.6.1.

BSCP533 Appendix B

Respondent	Location	Comment
EDF Energy	3.3.6	On page 43 there is reference to the D0286 rather than the D0268 dataflow
EDF Energy	3.3.7	As above, on page 48.
EDF Energy	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.
TMA Data Management Ltd	P45	Correct 286 to 268 in " Registrations and missing D02868s 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."
TMA Data Management Ltd	P48	Correct 286 to 268 in " D02868s received 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."