

4.7 Issue Form

Issue Form	Issue Number 66 <i>(mandatory by BSCCo)</i>
Issue Title <i>(Mandatory by originator)</i>	
Responsibility for addressing Meter faults for Dual Function Meters with different Suppliers for Import and Export	
Issue Description <i>(Mandatory by originator)</i>	
<p>There is currently an issue present with Dual Function Meters. The issue occurs when the Meter has a fault, but there are different Import and Export Suppliers. Under the existing rules, the Import Supplier has the right to appoint the Meter Operating Agent (MOA) for the Meter. The Export Supplier is expected to appoint the same MOA. Both Suppliers are jointly and severely liable for the Meter if it becomes faulty.</p> <p>Due to the lack of any explicit contractual situations, the Export Supplier may be unable to make contact with the MOA appointed by the Import Supplier. This means the Export Supplier cannot direct the MOA to rectify the fault. If the Export Supplier identifies a fault, but cannot contact the MOA, the fault may be left unresolved. In theory, the Export Supplier could request the Import Supplier to direct the MOA to resolve the fault. However, this may be prevented by limited communications between Suppliers and a lack of clarity over responsibility.</p> <p>Problems would also arise if the Import and Export Suppliers appoint separate MOAs due to contractual issues (currently not allowed under the BSC). In this scenario, each MOA could install a separate Meters for Import or Export. This in turn could cause Meter Technical Detail issues for the other Supplier.</p> <p>As both the Import and Export Supplier are jointly and severely liable, it isn't clear which Supplier is responsible in the event of a fault. This lack of enforced responsibility, could lead to the Supplier not engaging to rectify the fault</p> <p>There are two key discussion questions to explore are:</p> <ul style="list-style-type: none"> • Who should be responsible when there are shared MOA arrangements? • What are the most appropriate communications means to resolve potential issues? 	
Justification for Examining Issue <i>(Mandatory by originator)</i>	
<p>The number of shared metering arrangements in the market is likely to increase in the future with the introduction of smart meters that are capable of measuring import and export. Currently, the lack of engagement between the Import and Export Suppliers may lead to a detrimental experience to the consumer. This could discourage the consumer from having different Import and Export Supplier.</p> <p>There may also be impact on consumer's ability to maintain service from chosen Suppliers where Export and Import for electricity and gas supply each have unique Suppliers. Smart Meters sets rely on the communications hub which is usually linked to the Electricity Meter. Any remedial work on the electricity supply could interrupt communication for Export or more likely the gas supply, leading to loss of data or service for the consumer.</p> <p>Additionally, the issues may act as a disincentive for suppliers to offer export services to consumers, potentially hindering competition in the export market. Similar issues can arise if the customer notifies their FiTs export Supplier of a fault where only the Import Supplier has responsibility for the Meter if the export is not registered for Settlement.</p> <p>It would be beneficial to proactively discuss this issue and get stakeholder input now rather than wait until the problem becomes more widespread. Assessment by an Issues Workgroup will also allow the Workgroup to identify any other possible solutions.</p>	

Potential Solution(s) *(Optional by originator)*

Ecotricity has proposed that the Import Supplier be primarily responsible for repairs of faulty Meters.

The Export Supplier shall be obligated to make the Import Supplier aware of a fault/issue once it has been discovered, in which the Import Supplier will then be obligated to rectify the fault.

The proposed process for this shall be that upon discovery of the fault/issue, the Export Supplier sends a DTC Dataflow to the Import Supplier, detailing the information of the fault. This DTC Dataflow shall be a new Dataflow that shall need to be created via a DTC change proposal. The Export Supplier shall use MPAS data from ECOES to identify the Import Supplier and therefore the party they need to send the Dataflow to.

Upon completion of the meter works, the Import Supplier shall ensure that the Export Supplier is informed of the new Meter Technical Details should the meter have been exchanged, or inform the Export Supplier of the outcome of the investigations should the meter has not been exchanged. To receive the Meter Technical Details, this would require the Export Supplier to receive a D0150/D0268, which can be facilitated by the Import MOA sending this to the Export MOA, who can then send this to the Export Supplier and Export DC. In the circumstance that there has not been a meter exchange, but the fault has been investigated, the newly created DTC Dataflow could be sent from the Import Supplier to the Export Supplier, to notify them of the outcome of the appointment.

As this required newly created DTC Dataflow serves multiples purposes for Import/Export, it shall be proposed that this flow has the title and purpose of 'Import Export Information Exchange'.

It is also important to note that any commercial arrangements between the two Suppliers, for example a split invoicing of costs, materials used, the type of meter installed etc, would fall outside the scope of this modification proposal and the BSC.

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01/2017

4.8. Issue Form Guidelines

These guidelines are to be used to assist in the completion of the Issue Form, contained in Appendix 4.7. The guidelines state who should complete each item on the form and whether it is mandatory or optional. They also give a brief description of the information that should be given for each item. For further guidance please contact your BCA / PACA. Once completed this form should be submitted to BSCCo for inclusion on the relevant Panel Committee agenda.

- **Issue Number** –mandatory to be completed by BSCCo once the proposed issue has been received. This is a unique number.
- **Issue Title** – mandatory and is completed by the originator at the time the issue is raised. This should be unique where possible.
- **Issue Description** – mandatory and is completed by the originator. The description should include as much detail as possible of the issue being encountered.
- **Potential Solution(s)** - optional by originator – This is to be completed where the originator has potential solutions that they want to be discussed as part of a potential solution to the issue.
- **Justification for Examining Issue** – mandatory by originator – details of the business case for examining the issue. This section should also include a brief assessment of the risk associated with leaving the problem/issue unresolved, in terms of materiality and probability of occurrence.
- **Proposer's Details** – mandatory completion by originator – the name, organisation, email address and telephone number of the proposer.