

# CP Consultation Responses



## CP1487 'Remove the exclusion of Change of Measurement Classes in BSCP533 Appendix B'

This CP Consultation was issued on 05 June 2017 as part of CPC0078, with responses invited by 30 June 2017.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
E.ON	1/1	Supplier and Supplier Agent
IMServ	0/1	Supplier Agent: HH and NHH, DC/DA and MOP
Morrison Data	0/1	Supplier Agent: MOP, NHHDC and NHHDC
SSE Energy Supply Limited	1/1	Supplier and Supplier Agent: HHMOA and NHHMOA
Siemens Managed Services	0/1	Supplier Agent: HHDC, HHMOA, NHHDC and NHHMOA
Scottish power	1/1	Supplier and Supplier Agent: HHDC and NHHDC
Stark Software International Ltd (SSIL)	0/1	Supplier Agent: HHDC, HHDA, NHHDC and NHHDA
TMA	0/1	Supplier Agent: HH and NHH DC/DA

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	<b>X</b>	<b>X</b>	<b>X</b>	<b>X</b>
E.ON	✓	✓	✓	✓
IMServ	<b>X</b>	✓	✓	<b>X</b>
Morrison Data Solution	<b>X</b>	✓	✓	<b>X</b>
SSE Energy Supply Limited	✓	✓	✓	✓
Siemens Managed Services	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✓
SSIL	✓	<b>X</b>	<b>X</b>	<b>X</b>
TMA Data Management	✓	✓	✓	✓

## Question 1: Do you agree with the CP1487 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	3	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	<p>Elxon are currently undertaking a whole review of the performance assurance framework. As part of this they will be looking into the provision of data. Until that whole review has taken place we do not think that we should me making changes to PARMs.</p> <p>There is an acceptance that the PARMs serials this proposes to amend have issues. There is a public paper at PAB197/14 that lists out some of the issues with the PARMs serials this proposes to amend. As extract from this paper states:</p> <p>ELEXON noted that there were limitations in the current assessment process. Investigating deployment of EFR and working with PAPs on EFR plans for these risks is not straightforward. This is largely down to the limitations from using PARMs data. As a consequence, obtaining a true and reliable picture of the data and the issues takes considerable time for both ELEXON and impacted PAPs. PAPs have raised concerns with ELEXON around misreporting and inclusion of non-Settlement impacting issues within reporting, expressing frustration that time and resource is being spent on investigations that are not causing genuine Settlement issues.</p> <p>During the Performance Assurance Framework review stakeholder engagement exercise, respondents unanimously cited that PARMs does not give a credible view of risk. The view of compliance that it gives is often unclear, inaccurate, incomplete or inconsistent.</p> <p>Unless the whole PARMs serial is being addressed we do think that it makes sense to make small amendments to the criteria as this will not address all of the issues that are currently present.</p> <p>Furthermore as part of the paper it states that no more suppliers will enter EFR because of these risks and that in order to assess the risk ELEXON will</p>

Respondent	Response	Rationale
		<p>undertake TAPAP checks this year. As this change won't be made until Feb 2018 it makes sense to let ELEXON undertake TAPAP checks before the change is proposed. This could be investigated as part of the TAPAP check to understand the risks that are present before we make permanent changes.</p> <p>We agree that changes should be made to this serial and this could be one of them. But bearing in mind this isn't due to go live until 2018 we think the whole serial should be looked at to improve and address all of the issues that ELEXON state is present with it.</p>
E.ON	Yes	<p>We support CP1487 as the potential changes detailed in the consultation will be useful in identifying any incorrect working practises being used. Removing the exclusion of Change of Measurement Classes from Standards 2-7 from NM12 and HM12 reporting for both DCs and MOAs is a positive step to ensure standards are maintained. We would support that notion that COMCs should be included in HM12 and NM12 reporting, and would support the thought that this is a gap in the process. This should make HM12 and NM12 PARMS reporting more robust.</p>
IMServ	No	<p>We do not believe the reported benefits justify the effort involved in making the changes as P272 should have concluded prior to any implementation and we do not believe the changes are aligned with HH Elective processes.</p>
Morrison Data Services	No	<p>Although we agree with the proposal to include missing MTD on CoMC in NM12 and HM12 we believe a broad review of these PARMS serials is required in light of changes such as Elective HH and the increased role of suppliers in generating MTD for DCC serviced meters.</p> <p>Our view is that PARMS reporting is complex to amend and test therefore it is not efficient to make these changes now when it is highly likely further changes are going to be needed in the near future. These changes should be included at that point.</p>
SSE Energy Supply Limited	Yes	<p>This proposal should improve PARMS arrangements.</p>
Siemens Managed Services	Yes	
Scottish Power	Yes	

Respondent	Response	Rationale
SSIL	Yes	The rationale is that the standards should have always been included for consistency with requirements of BSCP514 & how long MTDs have been missing for by Settlement Periods should indicate the extent of non-compliance with increased risk to settlement, especially NHH to HH.
TMA	Yes	

## Question 2: Do you agree that the draft redlining delivers the CP1487 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
7	1	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	
E.ON	Yes	The redlining accurately facilitates the intention of the modification.
IMServ	No Comment	
Morrison Data Services	No	We believe the note in the start of NH11 and NM11 <i>This Serial should not capture...sent for Change of Measurement Class...</i> adds confusion to these definitions as in both serial change of agent is already excluded (and both require a change of DC agent as part of the CoMC event).
SSE Energy Supply Limited	Yes	
Siemens Managed Services	Yes	
Scottish Power	Yes	Yes we do agree, however we would like to ensure that this change impacts NM12 and HM12 serials only. The draft redlining indicates that NM11 and HM11 are impacted by this change, therefore are we expected to exclude the MTDs received following the CoMCs? We would like further clarification from Elexon on this point. For NM12 and HM12 serials where there is CoMC for an AMR meter, a D149, D150 and D313 are required enable a D268 flow to be built. What if a D149 and D150 were received and the D313 was missing, this would still impact on settlement? Can you please clarify what would happen in this particular case?
SSIL	Yes	
TMA	Yes	Please see comment on redlining.

## Question 3: Will CP1487 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	
E.ON	Yes	Small IT changes will be required to facilitate the outlined changes in particular in our capacity as Agents. A review of internal Supplier Processes would also need to be performed.
IMServ	Yes	<p>IMServ uses a fully automated process to compile the information required for all parms serials and to submit these on a monthly basis: there is no manual intervention or validation involved. The proposed changes would therefore require changes to existing coding which would need to be delivered as a software project – as has been the approach for all previous parms requirements. Such a project involves multiple people from across the business to analyse and design the changes, the development and testing of such and the UAT of any changes. We have not reviewed the detail of this proposal to understand the exact impact however experience to date is that all PARMS projects have been significant in terms of effort, resource and timescales and all have overrun estimates.</p> <p>In addition, all parms changes have resulted in follow up checks by ELEXON as parties have interpreted the requirements differently. Supporting these follow up checks and subsequently making further changes also results in further similar costs</p>
Morrison Data Services	Yes	This will require system changes to the parms reporting for NHHDC , NHMOP and HHMOP. The changes for each role will be similar in that they are amendments to the reporting logic, although all 3 will be independent changes.
SSE Energy Supply Limited	Yes	There will be minor changes to our relevant systems to pick up missing D0150s.
Siemens Managed Services	Yes	As a Supplier Agent we will have to make modifications to the HM12 and NM12 Serial script codes to encompass the requirements of CP1487

Respondent	Response	Rationale
		prior to its implementation.
Scottish Power	Yes	
SSIL	No	Some minimal changes to reporting code.
TMA	Yes	CP1487 would impact our PARMS reporting.



## Question 4: Will your organisation incur any costs in implementing CP1487?

### Summary

Yes	No	Neutral/No Comment	Other
7	2	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	
E.ON	Yes	
IMServ	Yes	See above (Question 3) costs would be one off for development and implementation but follow up amendments are also likely.
Morrison Data Services	Yes	Detailed information is not available at this point. However the changes will require IT analysis, development and testing staff to identify, make and test the reporting changes.
SSE Energy Supply Limited	Yes	There will be some minor costs, which we anticipate will be one off.
Siemens Managed Services	Yes	There will be one-off costs for the modifications described in the answer to Question 3. The majority of cost will be incurred in staff resource to develop and test the required computer program code amendments. We will have to amend four Serials scripts: HM12 – HHDC, HM12 – HHMOA, NM12 – NHHDC & NM12- NHHMOA. An initial estimate would be between 10 & 20 FTE days effort.
Scottish Power	Yes	We would incur a one-off cost, however an Impact Assessment would be required with further supporting details at this stage to determine the value.
SSIL	No	0.5 day man hours.
TMA	Yes	There would be one-off low costs for development, testing and implementation.

## Question 5: Do you agree with the proposed implementation approach for CP1487?

### Summary

Yes	No	Neutral/No Comment	Other
5	4	0	0

### Responses

Respondent	Response	Rationale
British Gas	No	See answer to Question 1.
E.ON	Yes	The Implementation approach outlined would allow sufficient time for changes to be made.
IMServ	No	No PARMS changes should be made prior to the conclusion of the PAF workstream regarding data provision for PAF purposes as, it is still to be determined whether PARMS are the most suitable source and if so, whether any other changes are required. In summary, if they are to be abolished changes cannot be justified and if they are to remain, all changes should be managed at the same time.
Morrison Data Services	No	There is insufficient details in the implementation section, we would need to understand which reporting period the changes would apply to as 22nd February could apply to the January 2018 or February 2018 reporting period. This release is a realistic data to apply the changes if they are approved.
SSE Energy Supply Limited	Yes	We are supportive of this proposal being included in the February 2018 release.
Siemens Managed Services	Yes	As long there is a six month lead time between Approval and Implementation, we will be able to plan in and resource for the necessary system changes prior to the Implementation date.
Scottish Power	Yes	
SSIL	No	As system changes are minimal & the rationale is that it was an oversight to exclude these standards, as early an implementation as possible to rectify this seems appropriate; there is still a significant percentage of NHH-HH to take place, & with particular reference to measurement classes E & G, one of the most significant reasons for poor settlement performance is potentially being masked.

Respondent	Response	Rationale
TMA	Yes	Given the potential of impact of CP1487, an implementation date of 22/02/18 is suitable.

## Question 6: If a system change is required, how long would it take to implement?

### Summary

Yes	No	Neutral/No Comment	Other
4	0	5	0

### Responses

Respondent	Response	Rationale
British Gas	Neutral	
E.ON	Yes	We believe that the changes could be implemented relatively quickly and within the lead off time given.
IMServ	Neutral	See above (Question 5). PARMS requirements and subsequent changes have proven onerous in terms of project time due to the lack of detail in the requirements regarding the handling of exceptions and the difficulty in the easy identification of the relevant scenarios from the information provided to agents.
Morrison Data Services	No Comment	This level of information is not available at present, however it would be possible to complete the change by February 2018.
SSE Energy Supply Limited	Neutral	Please see response to Question 5.
Siemens Managed Services	Yes	Please see answer to Question 4.
Scottish Power	Yes	We would anticipate a minimum time frame of at least 6 months; this would also be dependent on the outcome to our queries raised within Question 2 above.
SSIL	No Comment	
TMA	Yes	We would request 3 months lead time.

## Question 7: Do you think this CP will afford a benefit for Suppliers / DCs / MOAs?

### Summary

Yes	No	Neutral/No Comment	Other
6	2	1	0

### Responses

Respondent	Response	Rationale
British Gas	Yes	Only some benefit – see response to Question 1.
E.ON	Yes	Across supplier, DC and MOA, having more information around COMCs in PARMS reporting will be of benefit. Due to challenges in identifying a COMC from the appointment flows (D0155,D0148 ect) most of our exclusions are completed retrospectively.
IMServ	No	PARMS currently (and the proposed changes) are of no benefit or use to us as an agent. We use alternative real time monitoring and control reports which provide the information we need in a format tailored to our requirements and in timescales that allow us to take timely action.
Morrison Data Services	No	We believe by the time this CP would be implemented the volume of events that it is relevant to would be small. Our belief is the smart CoMC processes would need new reporting to monitor meaningfully. We also believe that typically CoMC process including those relating to P272 are closely monitored by all parties involved already.
SSE Energy Supply Limited	Yes	Please see response to Question 1.
Siemens Managed Services	Yes	It would give the parties involved a more complete picture of the transfer of MTD. However the use of HM12 and NM12 as has been outlined elsewhere are of limited use in identifying the reasons why MTD are not transferred. There are many potential points of failure in the MTD exchange process, therefore the suggestions in the PAB paper PAB197_14_Missing-MTDs_v1.0.pdf may well provide a better method for measuring the performance of MTD transfer than any amendments to HM12 & NM12.
Scottish Power	Yes	This benefit will further highlight missing MTD's, with additional focus tracked through the BUSSR

Respondent	Response	Rationale
		reporting.
SSIL	Yes	The data should be used as a method to provide transparency of those agents who by their non-compliance have a poor performance in this area, especially those most at fault, which does have a direct impact as a risk to Settlement & thus, in turn provide a potential incentive towards improved performance. Settlement performance for measurement classes E & G would benefit which in turn provide more evidence towards incentivising elective HH progress with PC 03-04 firmly in mind. It could also be used as mitigation & evidence for Suppliers/ DC where there is a drop in Settlement performance where there is bulk CoMC; whilst highlighting where the most action is required to achieve positive rectification.
TMA	No Comment	

## Question 8: Do you have any further comments on CP1487?

### Summary

Yes	No
3	6

### Responses

Respondent	Response	Comments
SSE Energy Supply Limited	No	
Siemens Managed Services	No	
Scottish Power	No	
SSIL	No	
TMA	No	
Morrison Data Service	Yes	As stated in the first question we believe these changes are appropriate but should be included in a wider change to the monitoring to update the reporting for new smart processes.
IMServ	Yes	The analysis of the impact was undertaken by an operational expert who was unaware of any previous PAB discussions on justification, benefit or cost. He has however independently come to the same conclusion as myself, i.e. that the cost and effort cannot be justified against the benefits cited.
E.ON	Yes	Although we agree with the proposed change consideration needs to be given to the impacts from the PAF review. We understand that these changes may not come to fruition until 2018/2019 but discussions in the working group (69) suggest that PARMs will be amended as part of the review.
British Gas	No	

**BSCP533 Appendix B**

Respondent	Location	Comment
TMA	3.3.9 purpose of the serial/Note	NM11 relates to NHH meter details D0150 "or D0268s sent for Change of Measurement Class from Half Hourly to Non-Half Hourly" should be corrected to "or <del>D0268</del> D0150s sent for Change of Measurement Class from Half Hourly to Non-Half Hourly"