

CP Consultation Responses



CP1497 'Introduction of dataflows for Half Hourly Meter Operator Agents to pass on Commissioning information when there is a Change of Agent'

This CP Consultation was issued on 6 November 2017 as part of CPC00782, with responses invited by 1 December 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1/0	Supplier
BUUK Infrastructure	1/0	Distributor
E.ON	1/1	Supplier/Supplier Agent
IMServ Europe (UKDC)	0/1	Supplier Agent
Npower	3/0	Generator, Supplier and Non Physical Trader
Northern Powergrid	1/0	Distributor
Scottish Power	1/1	Supplier/Supplier Agent
Siemens Managed Services	0/1	Supplier Agent
SP Distribution SP Manweb	1/0	Distributor
SSE Energy Supply Limited	1/1	Supplier and Supplier Agent
TMA	0/1	Supplier Agent
Western Power Distribution	1/1	Distributor/Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✓	✓	✓
BUUK Infrastructure	✓	✗	✗	✗
E.ON	✓	✓	✗	✓
IMServ Europe (UKDC)	✓	✓	✓	✓
Npower		✓	✓/✗	✗
Northern Powergrid	✓	✗	✗	✗
Scottish Power	✓	✓	✓	✗
Siemens Managed Services	✓	✓	✓	✗
SP Distribution SP Manweb				✓
SSE Energy Supply Limited	✗	✓	✓	
TMA	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✗

Question 1: Do you agree with the CP1497 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	1	2	0

Responses

Respondent	Response	Rationale
British Gas	Yes	
BUUK Infrastructure	Yes	We agree that CP1495, CP1496 and CP1497 are an improvement to the current process which is extremely resource intensive and creates confusion. The steps proposed should reduce both of these aspects and improve settlement as a result.
E.ON UK	Yes	We are supportive of CP1497 on the basis that it should help improve the process around commissioning and make things more linear and streamlined for all parties.
IMServ Europe (UKDC)	Yes	The current email process is not fit for purpose
Npower		<p>CP 1497 is reflective of the changes created by DTCP CP 3522, alongside CP 1496. CP 1496 introduces two new commissioning flows to help assist the P283 project and technical assurance, and CP 1497 makes changes to the BSCPs to reflect the updated working time scales in commissioning.</p> <p>Npower supports this change as per our comments in regards to DTC CP 3522 and BSC CP 1496.</p> <p>However, we have a concern that there appears to be no explanation about what happens when a meter operator goes through a change of agent? Will the meter operator send out the flows, including the D0268 and the new potential flows? Or does the newly acquired HHMOA (Half Hourly Meter Operator Agent) request this from the DNO again, as potentially the metering CT ratio could change by the DNO and a notification may not have been sent out? This would ensure that commissioning was carried out accurately and ensuring that the metering on the wall remains compliant.</p>
Northern Powergrid	Yes	

Respondent	Response	Rationale
Scottish Power	Yes	We agree with the proposed solution
Siemens Managed Services	Yes	Agree that the proposed solution will provide a more robust mechanism for the transfer of commissioning information, and notification of any defects.
SP Distribution SP Manweb		
SSE Energy Supply Limited	No	<p>We have assessed CP1496 and CP1497 alongside the equivalent DTC proposal, 'DTC CP3522 – BSC Meter Commissioning Data Flows' as this is a cross-code issue. We would like to make it clear that support the principle of CP1496, CP1497 and DTC CP 3523 and recognise that a DTC solution is more secure and auditable than the existing email transfer. However, we remain concerned by the process of MOA-MOA transfer of the DAXXX flow as discussed at previous working groups.</p> <p>Our response to the DTC CP is as follows,</p> <p>"We support the principle of sharing commissioning records via the DTN to improve the auditability and general robustness of the process. Our concern is that that the DAXXX data flow is sent MOA to MOA, as opposed to solely being sent LDSO to MOA.</p> <p>We are of the view that the LDSO should act as the single source of truth because in the majority of cases they own the equipment and therefore own the data. Transferring the detailed records in the DAXXX between MOAs suggests the MOA becomes the owner of the data. On a Change of Agent, we believe it is far more robust and reasonable for the incoming MOA to contact the owner/ source of the data (LDSO) to ensure the data they are requesting is accurate and up-to-date. Furthermore, if the LDSO owned data is shared MOA to MOA and there is an error in the data, then it suggests the outgoing MOA has also become responsible, to some extent, for the potential settlement risks/ errors arising from the incorrect data.</p> <p>We remain supportive of transferring the full commissioning record LDSO to MOA (DAXXX) and the minimal commissioning information (DBXXX) being sent MOA to MOA.</p> <p>We are currently reviewing the related BSC CPs, but we believe the issue of sending DAXXX MOA to MOA</p>

Respondent	Response	Rationale
		is the only concern we have with this proposal.”
TMA	Yes	
Western Power Distribution	Yes	We support the rationale for the introduction of the data flows for HHMOA to pass on Commissioning information when there is a Change of Agent.

Question 2: Do you agree that the draft redlining delivers the CP1497 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	0	2	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	
BUUK Infrastructure	Yes	
E.ON UK	Yes	
IMServ Europe (UKDC)	Yes	The requirements for Whole Current metering are not clear in the red line text, presumably the new flows are only sent for CT and VT operated systems (identified by the presence of a CT/VT ratio in the D0268). Are CoMC scenarios to be considered, if a NHH CT meter is moving to the HH market; are there obligations on the outgoing NHH MOP to transfer their commissioning certificates, or is this out of scope?
Npower	N/A	
Northern Powergrid	Yes	Although we are not directly impacted as a DNO, we believe this is a necessary introduction as it may prevent the requests to LDSO from MOA for commission information.
Scottish Power	Yes	No issues
Siemens Managed Services	Yes	
SP Distribution SP Manweb		
SSE Energy Supply Limited	Yes	
TMA	Yes	
Western Power Distribution	Yes	

Question 3: Will CP1497 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
9	2	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Internal system changes to ensure processing and reporting of new dataflows where necessary
BUUK Infrastructure	No	
E.ON UK	Yes	As a MOA we would have to undertake a process update to include the new flows.
IMServ Europe (UKDC)	Yes	Our 3 rd party Wheatley MOP database (for NHH & HH) will need to go through the whole change cycle in order to be updated to accept and process the new flows and new data items, with this also come's changes to Operational documents and processes.
Npower	Yes	<p>The impact to the business from this CP will fall in line with Supplier and HHMOA processes, the creation of the two new flows (from this and CP 1496) will result in changes to the Supplier/HHMOA processes (LWPS).</p> <p>On a plus note the impact of creating these flows would provide a further confidence in our settlement process and ensure that the customer has a correct CT ratio and commissioning carried out on their site and would also provide notification of why an appointment is not to go ahead saving the business money on failed on the day appointments.</p> <p>As new flows will be created which we will be required to receive and send we will need to understand the cost for updating current systems to support this functionality.</p>
Northern Powergrid	No	Although we are not directly impacted, there may be a reduction in the requests to LDSO for commission information.
Scottish Power	Yes	Yes, combined with CP1495 and CP1496 this will require significant process and system changes.
Siemens Managed Services	Yes	There will be impact to our organisation in the role of MO; significant system and process changes will be needed to support the transfer of commissioning

Respondent	Response	Rationale
		<p>information via the new data flows.</p> <p>Detailed system analysis will be required to specify the changes needed to our MO portfolio application and data flow processing and routing functionality, followed by the actual software development and testing. There will be considerable change to back office business processes associated with commissioning data, which will require revision of existing documentation, with associated training to users.</p>
SP Distribution SP Manweb		
SSE Energy Supply Limited	Yes	We will need to implement business process and system changes for our HHMOA and Supply business to manage the new data flows.
TMA	Yes	It would impact our systems and procedures.
Western Power Distribution	Yes	System changes will be required to accommodate the population of these data flows.

Question 4: Will your organisation incur any costs in implementing CP1497?

Summary

Yes	No	Neutral/No Comment	Other
7	3	1	1

Responses

Respondent	Response	Rationale
British Gas	Yes	
BUUK Infrastructure	No	
E.ON UK	No	
IMServ Europe (UKDC)	Yes	Wheatley MOP development and project related costs, plus ongoing costs to trigger flows and manage exceptions
Npower	Possibly	We cannot comment on the implementation costs at this time.
Northern Powergrid	No	
Scottish Power	Yes	Yes, Impact assessment required to confirm overall costs.
Siemens Managed Services	Yes	There will be internal costs associated with analysis, design, testing, process updates and training, and significant external costs will be incurred for software development. Without confirmed details of the flow structure and content at this stage, it is not possible to obtain estimates for timescales or cost of this work.
SP Distribution SP Manweb		
SSE Energy Supply Limited	Yes	There will be on-off costs to implement the new process to manage these flows, and some ongoing costs to operate the new process.
TMA	Yes	There would be low to medium costs involved with the development, testing and implementation of CP1495.
Western Power Distribution	Yes	Costs will be incurred in making the necessary company policy document changes, amending company systems and processes and to briefing /

Respondent	Response	Rationale
		training staff on the revised requirements. These will be one off costs.

Question 5: Do you agree with the proposed implementation approach for CP1497?

Summary

Yes	No	Neutral/No Comment	Other
5	6	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	
BUUK Infrastructure	No	Whilst we are not impacted directly we have not advocated the proposed implementation approach for CP1495 and on the basis, that the date should be aligned with all other CP's we would not support this implementation date for CP1497.
E.ON UK	Yes	We agree that it makes sense to introduce the BSC and DTC changes at the same time.
IMServ Europe (UKDC)	Yes	No further comments
Npower	No	Implementation should not be before November 2018. Since the related MRA change (DTC CP 3522) implementation date is now November 2018, the implementation for CP 1497 should also be pushed back to that date.
Northern Powergrid	No	As per our comments for CP1495 and CP1496 we believe that this associated change should also be implemented in the November 2018 release.
Scottish Power	No	We would prefer a November 2018 implementation date, as related changes CP1495 and CP1496, if approved will require significant process and system changes.
Siemens Managed Services	No	<p>Agree the implementation should coincide with MRASCO's DTC Change proposal, but we would require a longer lead time in order to adequately design, develop and test the system changes required to facilitate the new data flow. The volume of work required would not be achievable by June 2018, and would suggest a more realistic implementation date of February 2019</p> <p>As per our response to the corresponding question to the CP1496 consultation, we note similar comments on timescales and implementation dates in the responses to the MRA consultation on DTC CP</p>

Respondent	Response	Rationale
		3522, with the majority of respondents saying that a June 2018 implementation is not practical and proposing a February 2019 or November date.
SP Distribution SP Manweb	Yes	As per our response to CP1495 it makes sense to implement both the proposed MRA changes and CPs 1496 and 1497 all at the same time as they are all intrinsically linked.
SSE Energy Supply Limited		We agree that there should be a minimum 6 month lead time between the approval of this BSC CP and the equivalent DTC CP and therefore accept the June 2018 implementation date that has been proposed. However, we note that MDB (30/11) approved a November 2018 implementation date and we expect this BSC CP to be implemented in November 2018.
TMA	Yes	
Western Power Distribution	No	We believe that the implementation date should align with the associated DTC Change, and therefore should be amended to 1st November 2018.

Question 6: Do you have any further comments on CP1497?

Summary

Yes	No
2	10

Responses

Respondent	Response	Comments
British Gas	No	
BUUK Infrastructure	No	
E.ON UK	No	
IMServ Europe (UKDC)	Yes	<p>Given the complexity of the changes we think the proposed implementation date is optimistic.</p> <p>Because we are dealing with a new flows and new data items it will be necessary for MOPs (and DNOs) to migrate their existing portfolios so the new flows can be sent for existing sites, we do have some concerns that if this is not done properly then we may see missing, incomplete or inaccurate flows circulating for many years to come.</p> <p>To ensure consistency there is a need for a guidance document for all parties containing rules for retrospectively populating new flow fields.</p>
Npower	No	
Northern Powergrid	No	
Scottish Power	No	
Siemens Managed Services	No	
SP Distribution SP Manweb		
SSE Energy Supply Limited	Yes	<p>We believe there was a great deal of improvement in cross-code working between the BSC and MRA in developing these proposals. We do, however, believe it is necessary for the equivalent committees to have sight of the industry responses to both code consultations prior to making a decision to approve or reject. This would enable both committees to be in a possession of the full industry view ahead of making a decision. We have raised the same point</p>

Respondent	Response	Comments
		under the MRA and would welcome Elexon considering how this could work under the BSC to support CACOP.

