CP Consultation Responses

CP1514 'Number of register digits for smart Meters'

ELEXON

This CP Consultation was issued on 8 January 2019 as part of CPC00792, with responses invited by 1 February 2019.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON	1	Supplier, Supplier Agent: DC, DA, MOA
SMS Energy Services	1	Supplier Agent
TMA	3	Supplier Agent: HHDC, HHDA, NHHDC, NHHDA
SSE Electricity Ltd	3	Supplier, Supplier Agent: NHHMOA
Western Power Distribution	4	Distributor
Morrison Data Services	1	Supplier Agent: MOP, NHHDC, NHHDA
Stark	1	Supplier Agent: NHHDC

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
E.ON	✔	✔	✔	✔
SMS Energy Services	✔	✔	✔	✔
TMA	✔	✔	✔	✘
SSE Electricity Ltd	✔	✔	✔	✔
Western Power Distribution	✔	✔	✔	✔
Morrison Data Services	✔	✘	✔	✔
Stark	✔	✔	✘	✔

Question 1: Do you agree with the CP1514 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	We agree with proposed solution as it will reduce the risk reads failing validation.
SMS Energy Services	Yes	No rationale given
TMA	Yes	No rationale given
SSE Electricity Ltd	Yes	We agree that the proposed solution should add clarity on how Suppliers and NHHDCs should treat meter readings taken locally from SMETS2 meters. Though we agree that the proposed solution should reduce the risk of inconsistencies between local and remote readings, we note that any processes that require local reading of the SMETS2 meter will still leave a margin of error and therefore risk to settlement. Where possible the reading should be taken from the remote register, with retrieval of readings from the internal register the next preference over a visual read from the display.
Western Power Distribution	Yes	The solution aligns with the associated MRA change – DTC CP 3558 Standardisation of Number of Register Digits for SMETS2 meters which was approved for implementation 27/06/2019. This change will ensure that all suppliers treat these reads obtained from a SMETS2 meter the same.
Morrison Data Services	Yes	The principle of the solution seems to be sensible. Giving clear guidance on the how to use the number of dials on the MTD and how to managing difference between internal register data and displayed data helps to make sure the data is used consistently and should minimise the need for human interpretation of read histories. Does this CP need to only apply to SMETS2 meters, should it be stated more generally in the BSCPs for all meter types where there may be difference between the number of digits held on internal register and those displayed on the meter?

Respondent	Response	Rationale
Stark	Yes	Misalignment or identification of the number meter register digits has often been identified as a Settlement risk, particularly when manual readings have been taken.

Question 2: Do you agree that the draft redlining delivers the CP1514 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

Responses

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

Respondent	Response	Rationale
E.ON	No	We have concerns over the truncation of readings not being defined clearly enough within the proposed red lining and we would seek to remove any ambiguity. With the proposed wording a Supplier could truncate by removing either the first or the last digits depending on how they interpret the text. This is already an issue in the industry as Suppliers / Agents will truncate readings how they like to process readings. Rather than having wording such as "reading is truncated such that the number of digits is consistent with the MTD and User Interface (UI)" or "…treated as valid if the least significant digits (as specified in the MTD) are consistent with historical readings", we suggest that it would be better defined and less ambiguous as "leading digits from the reading are truncated such that the number of digits are consistent with the MTD and User Interface (UI)" or "…treated as valid if the trailing digits (as specified in the MTD) are consistent with historical readings"
SMS Energy Services	Yes	We agree that the draft redlining delivers the solution for NHHDC and MOA, however we believe that it could go further regarding BSCP504 section 1.1 (i) and 1.2.1 (d); the impression it gives is that though the Supplier should ensure the read matches the MTD digits, this is not a steadfast requirement as NHHDC will correct any issues with the read length. This then increases the impact of CP1514 on NHHDC and their systems.
TMA	Yes	No rationale given
SSE Electricity Ltd	Yes	No rationale given

Respondent	Response	Rationale
Western Power Distribution	Yes	No rationale given
Morrison Data Services	No	I believe the term User Interface (and UI) are not used elsewhere within the BSCP, and perhaps could be ambiguous with reference to a SMETS meter? The term "display of the Metering System" is used elsewhere. Throughout the red lining should we be specifying SMETS2 or should we be at least specifying SMETS2 and above?
Stark	Yes	No rationale given

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Question 3: Will CP1514 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	System and process change will be required to truncate and validate readings.
SMS Energy Services	Yes	As NHHDC we will need to change our system to account for the new level of Read Validation redlined in BSCP504 4.2.11 and update all documents and processes related to Read Validation.
TMA	Yes	As NHHDC our system and procedures will required to be modified.
SSE Electricity Ltd	Yes	There may be a low impact to us as a Supplier, as some additional manual intervention may be required in order to check and correct register digits in reads received that are flagged as inconsistent with the number of digits specified in the MTD and/ or other reads held in the remote register.
Western Power Distribution	Yes	There will be minimal impact to our MOA.
Morrison Data Services	Yes	As MOP we believe we will need to confirm our existing processes for none visual readings are compliant with this change, but expect actually changes to be limited to documentation updates and some training. As NHHDC we believe we will need to make additions to our validation processes both within our system and in our user processes. As the validation processes are part of our core processing we will need to perform a significant volume of regression testing.
Stark	Yes	Minor changes to read validation process.

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Question 4: Will your organisation incur any costs in implementing CP1514?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	1

Responses

Respondent	Response	Rationale
E.ON	Yes	We will incur one-off IT costs to implement systems changes.
SMS Energy Services	*Confidential*	*Confidential*
TMA	Yes	Medium level cost
SSE Electricity Ltd	Yes	There may be some associated costs with the additional manual intervention mentioned above, however it is difficult to anticipate such costs at this time.
Western Power Distribution	Yes	Any costs will be minimal.
Morrison Data Services	Yes	At this point we cannot estimate the actual cost but expect one-off cost to make and test the changes to our NHHDC system
Stark	No	No rationale given

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Question 5: Do you agree with the proposed implementation approach for CP1514?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
E.ON	Yes	We agree with the implementation approach to align the DP1514 and MRA DTC CP 3558 dates.
SMS Energy Services	Yes	No rationale given
TMA	No	Read validation is a complex area of the NHHDC role and we would like to have more time to develop test and implement the solution. The June release already includes several changes impacting Supplier Agents.
SSE Electricity Ltd	Yes	We agree with the proposed implementation date of 27 June 2019.
Western Power Distribution	Yes	No rationale given
Morrison Data Services	Yes	No rationale given
Stark	Yes	No rationale given

Question 6: Do you have any further comments on CP1514?

Summary

Yes	No
1	6

Responses

Respondent	Response	Comments
E.ON	No	
SMS Energy Services	No	
TMA	No	
SSE Electricity Ltd	No	
Western Power Distribution	No	
Morrison Data Services	Yes	As indicated in the comments on the redlining we believe it might be more sensible to make this changes of at least SMETS2 and above meters, but possibly for all meters where the number of digits differs between internal registers and the display of the metering system.
Stark	No	

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CP Redlined Text

BSCP504

Respondent	Location	Comment
Morrison Data Services	section 1.1 (i)	should refer to NHHDC not data collector or DC
	1.2.1 The NHHDC shall ensure:- d.	UI should be "display of the Metering System"
	3.3.8.2	some "when" reference seem to have been red lined but they do not seem relevant to this CP so I am not sure why they are being changed.
	4.2 11.	DC should be NHHDC. This requirement is also not very clear. I believe the intension is that if the NHHDC receives a reading that seems to have too many digits (compared to the MTD) then it should only use the appropriate digits assuming the reading is correctly provided in kWh. (whole units only, excluding any decimal places) Does this validation requirement only apply to readings for SMETS2 meters?

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Respondent	Location	Comment
Morrison Data Services		I believe the term User Interface (and UI) are not used elsewhere within the BSCP, and perhaps could be ambiguous with reference to a SMETS meter? The term "display of the Metering System" is used elsewhere.

Insert CSD Here

Respondent	Location	Comment

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Respondent	Location	Comment