



## REQUIREMENTS SPECIFICATION for Modification Proposal P223 Profile Administrator Service

Prepared by P223 Modification Group

<b>For Impact Assessment</b>	Date of Issue	<b>14 May 2008</b>	Version Number	<b>1.0</b>
For Attention Of	<b>BSC Parties, Party Agents, the Profile Administrator, BSCCo and other interested parties</b>			
<b>Overview or Purpose of Document:</b>				
<p><b>Proposed Modification P223</b> seeks to improve the Profile Administrator Service by replacing the existing process of recruitment of new customers into the profiling sample and the resultant data collection process with a new process as detailed in this document. This new process seeks to place responsibility on Suppliers to annually recruit new customers into the sample, replace the customer’s existing meter with a Half Hourly capable meter, and collect Half Hourly consumption data from this meter for profiling in addition to the normal Non Half Hourly data used in Settlement. Upon a Change of Supplier, the New Supplier is required to either retain the existing customer in the sample or to nominate a new customer.</p> <p><b>Alternative Modification P223</b> is largely identical to the Proposed Modification, except that, where a Change of Supplier occurs, no action is taken and the customer is lost from the profiling sample. This event is then taken into account in the following year’s sample recruitment.</p>				
<b>Background and Purpose of Impact Assessment</b>				
<p>P223 was raised by the BSC Panel on 10 April 2008, and is being considered by the P223 Modification Group (formed from members of the Volume Allocation Standing Modification Group and supplemented with expertise from the Profiling Expert Group). The P223 Modification Group (‘the Group’) has met 3 times to date on 11 April, 18 April and 2 May 2008, and has agreed the requirements for the Proposed Modification and Alternative Modification. This document sets out the requirements agreed by the Group, and supports impact assessment by BSC Agents, BSC Parties, Party Agents and BSCCo.</p> <p>P223 is expected to impact the Profile Administrator, BSCCo, Suppliers and Supplier Agents (Meter Asset Providers, Meter Operator Agents and Non Half Hourly Data Collectors).</p>				
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## Summary Of Impacted Parties And Documents

As far as the Modification Group has been able to assess, the following parties/documents would be impacted by P223:

- The Profile Administrator;
- BSCCo (ELEXON);
- Suppliers;
- Non Half Hourly Data Collectors (NHHDCs);
- Meter Asset Providers (MAPs);
- Meter Operator Agents (MOAs);
- Section S of the Balancing and Settlement Code ('the Code');
- BSC Procedures (BSCPs) 504, 510 and 514; and
- The Profile Administrator Service Description.

Please note that this list represents a summary of the full initial impact assessment contained in Section 5.

## Purpose of this document:

This Requirement Specification seeks to understand:

- The details of changes to participant systems, processes and documentation resulting from P223, and the costs of these changes; and
- The implementation lead time required:
  - **From:** the point of receiving the final redlined changes to the BSC and all impacted Category 1 Code Subsidiary Documents (e.g. Balancing and Settlement Code Procedures (BSCPs)); and
  - **Up to:** the point at which Suppliers receive the first Profiling Sample customer recruitment request under the new P223 process.

This document does not seek views on the merits of P223 at this stage (as this area will form part of a subsequent industry consultation).

Please respond to this impact assessment using the response form attached to the accompanying Change Proposal Circular.

**Respondents are requested to only provide details of the costs of P223 which are over and above those already incurred in supporting the existing profile administration process as described in Section 1.2.**

# **1 Background**

## **1.1 Issue or defect identified by P223**

P223 has been raised on 10 April 08 by the Panel following Issue 29 'Profile Administration Model' as it is believed that equipment replacement and recruitment issues exist with the current Profile Administration process. Issue 29 was raised by the Panel on 23 August 2007 following ELEXON's presentation of the issues at the Supplier Volume Allocation Group (SVG) meeting held on 31 July 2007 (Reference 1). The Volume Allocation Standing Modification Group (VASMG), which considered Issue 29, recommended that a modification should be raised.

The Profile Administrator (PrA) is the BSC Agent responsible for the production of load profiles that are used in the Settlement of Non Half Hourly (NHH) consumption. These profiles are based on Half Hourly (HH) data obtained for a sample of domestic and non-domestic NHH customers. The PrA is currently required to recruit customers to the sample and to collect the resulting data. An overview of the existing process is provided in Section 1.2 below.

Difficulties experienced by the PrA in recruiting customers to the profiling sample have historically led to dwindling sample sizes. These difficulties can be summarised as follows:

- Data Protection issues when approaching Suppliers for customer contact information;
- Inability to 'cold call' customers who are registered with the Telephone Preference Service;
- Unwillingness of customers to participate in the sample and/or sign up to the PrA's Terms and Conditions;
- Lack of space at customer premises for new PrA data-collection equipment;
- Lack of Global System for Mobile communication (GSM) signal at customer premises;
- Unwillingness of customers to power down their premises to allow the PrA's equipment to be fitted;
- Access issues to customer premises (leading to stranded assets);
- Lack of diversity in regional dispersion of domestic Sample Participants; and
- Lack of diversity in non-domestic Sample Participants when targeting group customers (e.g. a particular supermarket chain).

The table on the following page shows how the number of customers in the sample has decreased over the last 4 complete data years, and how these compare to the target sample size for 2007/08.

<b>Profile Class</b>	<b>Average no. of Participants in 2003/04</b>	<b>Average no. of Participants in 2004/05</b>	<b>Average no. of Participants in 2005/06</b>	<b>Average no. of Participants in 2006/07</b>	<b>2007/08 target</b>
1	518	448	406	343	610
2	415	353	355	285	550
3	245	279	232	156	360
4	209	217	188	132	300
5	125	134	116	73	220
6	75	88	71	36	120
7	81	83	75	42	120
8	144	149	130	70	220
<b>Total</b>	<b>1812</b>	<b>1751</b>	<b>1573</b>	<b>1137</b>	<b>2500</b>

Short-term measures are being taken to boost sample numbers (e.g. recruiting electricity industry staff). However, these are believed to be increasingly compromising the principle that the sample should be random and representative of consumption across different:

- Geographic regions (i.e. Grid Supply Point (GSP) Groups);
- Consumption patterns (i.e. Profile Classes);
- Levels of consumption (i.e. Strata); and
- Customer type (e.g. type of business/site for non-domestic customers).

This in turn leads to diminishing confidence in the resulting profiling data. The Panel believes that deterioration in profile data will lead to the NHH data used in Settlement becoming less reflective of actual consumption patterns.

Further details are contained in Section 1.2 of the P223 Initial Written Assessment (IWA, Reference 1), and within the Issue 29 Panel paper (Reference 2).

The overriding aim of P223 is to put in place a process (based on the 'straw man' solution developed under Issue 29) which will enable the ongoing recruitment and maintenance of a random, representative sample regardless of the target sample size. To achieve this, under P223 Suppliers would be responsible for recruiting future sample customers and for collecting the necessary data.

## **1.2 Current PrA process and responsibilities**

Section S4.2.1 of the BSC requires the PrA to 'create and maintain a load research sample using customer data provided to it by Suppliers and to carry out a programme of load research in order to collect half-hourly demand data from customers'.

A summary of the current processes which support these obligations is provided below:

- a) BSCCo<sup>1</sup> receives from each Supplier Meter Registration Agent (SMRA) reports relating to Settlement Days (15 January and 15 July each year) of all Metering System Identifiers (MSIDs) registered by a Supplier in each GSP Group covered by that SMRA.
- b) Consequently BSCCo provides to the PrA a report containing all NHH MSIDs registered by each Supplier. This enables the PrA to maintain an up-to-date list of customers and ensures that there are a sufficient number of customers to meet the sampling criteria.
- c) In order to aid this process, the PrA requests from the Supplier (via BSCCo) information relevant to sampling requirements such as address of the customer, confirmation of the Profile Class ID and Standard Settlement Class (SSC) ID as well as customer contact details. The PrA keeps the Supplier informed of all MSIDs belonging to the Supplier that are currently participating in the Profiling Sample.
- d) The Supplier provides the PrA (via BSCCo) with the required customer information upon request. The Supplier is also responsible for maintaining a record of all of their MSIDs participating in the Profiling Sample and for advising the PrA of any changes to the status of the respective MSIDs.
- e) The PrA is responsible for recruiting customers to the sample. The PrA identifies those customers who are appropriate candidates for participation in the Profiling Sample, and contacts these customers directly to attempt to recruit them to the sample. Where a customer agrees to participate, that customer is required to enter into terms and conditions with the PrA.
- f) For all recruited customers, a 'secondary' HH capable meter is installed in the customer's premises in order to collect HH consumption data for profiling purposes. The PrA is currently responsible for arranging the installation of the secondary meter, and for the collection of the resulting profiling data. Normal NHH consumption data continues to be separately collected through the usual Settlement meter by the Supplier's own agents.
- g) Where a Change of Supplier occurs, the old Supplier informs the PrA that it is no longer the Supplier for the applicable MSID. The PrA then contacts the customer to obtain the New Supplier details, so that the new Supplier can be informed that the respective MSID is part of the Profiling Sample.

Under the existing process, the PrA therefore has responsibility for the recruitment of, and subsequent relationship with, each Profiling Sample participant. Further details on the current PrA process can be found in BSCP510 'The Provision of Sampling Data to the Profile Administrator' (Reference 5).

Due to the difficulties experienced by the PrA in directly recruiting customers (as documented in the P223 IWA), P223 proposes that Suppliers should instead be responsible for recruiting customers to the sample and for collecting the resulting data. The remaining sections of this Requirements Specification detail the different Profiling Sample recruitment and data collection processes proposed by P223.

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<sup>1</sup> The Balancing and Settlement Code Company (ELEXON).

## 2 Summary of P223 Solution Requirements

**Proposed Modification P223** seeks to replace the existing sample recruitment and data collection processes with a new process containing the following obligations:

- 1) An annual obligation on Suppliers to randomly select a proportion of their own customers to participate in the Profiling Sample, based on targets set by the PrA/BSCCo according to the sample shortfall/requirements and the Supplier's market share;
- 2) A one-off obligation on Suppliers (via their appointed Meter Asset Provider (MAP) /Meter Operator Agent (MOA)) to replace these customers' existing Settlement meters with meters which are capable of recording both NHH consumption data for normal Settlement purposes and HH consumption data for profiling purposes;
- 3) An ongoing obligation on Suppliers (via their appointed Non Half Hourly Data Collector (NHHDC)) to remotely collect the recorded HH data from these meters and provide this to the PrA on a monthly basis, in addition to collecting normal NHH data for the customers under the existing Settlement processes;
- 4) An ongoing obligation on the PrA to identify a Change of Supplier for any customer within the Profiling Sample, and to contact the New Supplier for that customer;
- 5) An ad-hoc obligation on the New Supplier for a customer in the Profiling Sample after a Change of Supplier to either:
  - a) Retain that customer in the sample; or
  - b) Randomly select another of their customers to participate in the sample (in which case obligations 2)-3) above will apply); and
- 6) An annual obligation on Suppliers to confirm whether there has been a Change of Tenant for any of their customers within the Profiling Sample, and for the PrA to assess the continuing suitability of any such customer for the sample (to feed into the annual recruitment process outlined in 1) above).

In order to fulfil obligations 2 and 3, the Supplier can choose to:

- i) Appoint the PrA's own nominated agents (MAP, MOA, NHHDC and Non Half Hourly Data Aggregator (NHHDA)) to install the metering and collect both NHH and HH data. Under this option the PrA will bear the entire cost of these agent services, and there will be no direct charge to the Supplier; or
- ii) Appoint its own preferred Supplier Agents (MAP, MOA, NHHDC and NHHDA) to install the metering and collect both NHH and HH data. Under this option the PrA will reimburse the Supplier for the cost of the meter, and will provide an annual rebate to the Supplier (based on an amount determined by the PrA) to cover the cost of installing the meter, the associated MOA costs, and the airtime and dial cost of the NHHDC in obtaining the HH data. The rebate will exclude normal NHH data collection and NHHDA costs, since no changes are proposed to these processes.

**Regardless of which option is chosen**, all of these agents (MAP, MOA, NHHDC and NHHDA) must be either the PrA's or the Supplier's. There is no option to mix the agents (i.e. choose the PrA's NHHDC and MOA but retain the services of the Supplier's NHHDC).

**Alternative Modification P223** is identical to the Proposed Modification, except that no action would be taken by the PrA or Suppliers to retain the sample participant or obtain/provide a replacement customer upon a Change of Supplier (i.e. Requirement 12 as set out for the Proposed Modification in Section 3.5 of this Specification would not apply). Under this approach, the customer would be lost from the sample and any shortfall in participant numbers would be taken account of in the following year's sample recruitment.

**P223 will only apply to new or replacement Sample Participants (i.e. it will not apply to customers who are already in the sample).**

The requirements for the Proposed Modification can be found in Section 3. Details of the differences in requirements under the Alternative Modification are contained in Section 4.

For simplicity, the main areas of the proposed P223 process fall under:

- **Recruitment process (annual activity);**
- **Installation of metering equipment (one off activity);**
- **Funding (ongoing activity);**
- **Minimum metering requirements (ongoing activity);**
- **Data Collection (ongoing activity);**
- **Change of Supplier (CoS) / Change of Tenant (CoT) (ongoing activity); and**
- **Supplier Responsibility for Agents (ongoing activity).**

The following Section 3 therefore groups the P223 solution requirements under these headings for ease of reference.

Flow charts of the processes described in this Specification can be found in Appendix 2.

## **3 Detailed Proposed Modification Solution Requirements**

### **3.1 Details of the *recruitment* process**

As explained in Section 1.2, the PrA currently uses information provided by BSCCo and requested from Suppliers to select customers so that attempts may be made to recruit them to the sample.

In order to improve the efficiency of the process, P223 proposes that Suppliers directly select and recruit customers suitable for the sample, based upon a request issued by the PrA.

P223 will only apply to new or replacement Sample Participants (i.e. it will not apply to customers who are already in the sample).

- **Requirement 1: PrA sends recruitment requirement to BSCCo**

Each year, as in the current process, the PrA will establish the shortfall in Sample Participants by specifying the sample size required for each GSP Group, Profile Class, Stratum, consumption level and type of customer and send this information to BSCCo. Such requests will be issued to BSCCo by the first Working Day in December each year.



- **Requirement 2: BSCCo processes PrA requirement**

As in the current process, BSCCo will assess the PrA's requirement and pro-rata the number of required customers across Supplier by each Supplier's market share (i.e. Suppliers with a larger market share will be requested to provide more Sample Participants than Suppliers with a smaller market share), so that the number of customers that Suppliers are asked to recruit is in proportion to their size.

The PrA's overall recruitment target will be subdivided according to GSP Group, Profile Class, Strata and customer type. The number of customers which Suppliers are asked to provide in each of these categories will be calculated according to the Supplier's market share in the particular category. The market share of each Supplier shall be calculated at the aggregate company level in each category across all of its Supplier IDs, such that each Supplier organisation receives a single target for that category which takes account of all of its Supplier IDs.

Each Supplier will be required to annually confirm to the PrA (using its single point of contact – see below) the list of all its associated Supplier IDs for use in calculating its market share.

BSCCo will consequently provide the pro-rated numbers back to the PrA within 10 Working Days. It is anticipated that the sample requirement for a large Supplier (based on the existing target sample size of 2,500 customers) will not exceed 200 customers, and for a small Supplier would be a much smaller number (e.g. 2 or 3 or perhaps none at all).

- **Requirement 3: PrA requests Sample Participants from Suppliers**

Once the number of required customers has been pro-rated across Suppliers by BSCCo as detailed in Requirement 2, each year the PrA will request each Supplier for new Sample Participants via email using a single dedicated point of contact for each Supplier at the aggregate company level (i.e. to cover all of its Supplier IDs/MSIDs). The email will specify separate targets for the Supplier based on GSP Group, Profile Class, Stratum and customer type using a standard template. Such requests will be sent to Suppliers by the first Working Day in January each year.

**For example:** The PrA requests the Supplier for Sample Participants for **Profile Class 1**.

*A **Profile Class** is a representation of an exclusive category of customers whose Consumption can be reasonably approximated to a common representation for Settlement purposes.*

*In this example, the PrA has a target of 1000 Participants for Profile Class 1. However the PrA's existing Sample size is composed of 708 Sample Participants.*

*This would mean that there is a shortfall of 392 customers, which makes up the PrA's requirement to reach 1000 Sample Participants. Therefore the PrA's requirement for the Sample would be:*

**Stratum 1** = Sample Participants with consumption 0-3000 kWh

**Stratum 2** = Sample Participants with >3000 – 7500 kWh

**Stratum 3** = Sample Participants with > 7500 kWh

**Table 1:**

Recruitment Requirement GSP Group	Stratum			Total
	1	2	3	
_A	29	31	14	74
_B	20	20	7	47
_C	28	31	10	68
_D	11	4	5	20
_E	2	11	2	15
_F	16	6	6	28
_G	13	11	7	31
_H	23	34	1	58
_J	0	0	0	0
_K	4	0	7	11
_L	14	0	4	18
_M	0	0	0	0
_N	6	1	3	10
_P	0	4	8	12
<b>Total</b>	<b>166</b>	<b>152</b>	<b>74</b>	<b>392</b>

The above table 1 defines the total sampling requirement for the Profile Class 1. Based on BSCCo's response as detailed in Requirement 2, the requirement for Sample Participants will be divided by the Supplier's market share.

**Table 2:**

**Large Supplier A with a 20% Market Share (required to recruit 78 Sample Participants)**

Recruitment Requirement GSP Group	Stratum			Total
	1	2	3	
_A	6	6	3	15
_B	4	4	1	9
_C	6	6	2	14
_D	2	1	1	4
_E	0	2	0	3
_F	3	1	1	6
_G	3	2	1	6
_H	5	7	0	12
_J	0	0	0	0
_K	1	0	1	2
_L	3	0	1	4
_M	0	0	0	0
_N	1	0	1	2
_P	0	1	2	2
<b>Total</b>	<b>33</b>	<b>30</b>	<b>15</b>	<b>78</b>

**Table 3:**

**Small Supplier B with a <1% Market Share (required to recruit 3 Sample Participants)**

Recruitment Requirement GSP Group	Stratum			Total
	1	2	3	
_A	0	1	0	1
_B	0	0	0	0
_C	0	1	0	1
_D	0	0	0	0
_E	0	0	0	0
_F	0	0	0	0
_G	0	0	0	0
_H	0	1	0	1
_J	0	0	0	0
_K	0	0	0	0
_L	0	0	0	0
_M	0	0	0	0
_N	0	0	0	0
_P	0	0	0	0
<b>Total</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>3</b>

The above tables (2 and 3) will be delivered to the dedicated contact at the Supplier. As this example relates to Profile Class 1, the request is not further subdivided by level of consumption and type of customer. However, this subdivision would take place for other Profile Class (e.g. for Profile Classes 5 to 8).

The Supplier will be required by the BSC to randomly select suitable MSIDs from their own customer records, such that the resulting MSIDs are a random representation of their entire portfolio and are not biased in favour of any one particular customer type, region or other subset of the Supplier's customers. Any further references in this Specification to 'random' selection should also be taken to represent this principle.

**The following types of customer are not used in the Profiling Sample, and should therefore not be provided by the Supplier to the PrA:**

- a) Customers using or requesting the use of their own agents;
- b) Customers that use a prepayment meter;
- c) Customers that already have a 'smart' meter which is not HH capable;
- d) Customers that own their own meter;
- e) Customers whose meters are controlled by the Radio Teleswitch Service (RTS); and/or

- f) Customers in Profile Classes 2 and 4 who are not on a continuous tariff which is one hour either side of 00.30 to 07.30 hours. For the avoidance of doubt, the PrA **would require** customers with two rate metering and where the low rate is overnight in one continuous time period (i.e. economy 7 where the high rate is 07:00 – 23.59 and the low rate 00:00 – 06:59). Low rate time periods such as 02:00 – 09:00 would mean that the customer is excluded from the sample. Customers that have their low rate split into 2 or more time periods would also be excluded. Please note that the switch load should be synchronised with the register.

Where a randomly-selected customer falls into one of the above groups, the Supplier shall randomly select a replacement customer before sending the list of selected MSIDs to the PrA.

Suppliers may also reject a randomly-selected customer where the Supplier is aware of existing access issues to that customer's premises, and providing that the Supplier randomly selects a replacement customer to send to the PrA.

- **Requirement 4: Supplier sends a list of suitable Sample Participants to the PrA**

Having randomly selected appropriate MSIDs, the Supplier will then send the resulting customer information back to the PrA in an email.

The information would be provided using a standard email template containing the following:

- MSID;
- Name of customer and, if appropriate, a contact name;
- Address of customer, including billing address if different from the site address;
- Confirmation of Profile Class and SSC ID;
- Confirmation of GSP Group;
- Total annual energy consumption based on the latest 12-month period;
- Where applicable, day/night split of annual energy consumption based on the latest 12-month period;
- Where applicable, details of switching times for registers and/or load;
- The applicable annual Maximum Demand in kW based on the latest 12-month period;
- Where applicable (e.g. for Profile Classes 5 to 8), the type of customer concerned (e.g. SME, commercial); and
- Stratum.

- **Requirement 5: PrA assesses the customer's details sent by the Supplier**

The PrA will assess the customers provided by each Supplier using ECOES (Electricity Central Online Enquiry Service) to understand the suitability of the customer for the sample. The PrA will reject customers where information suggests that there would be significant difficulty in fitting HH metering equipment and collecting data, if the customers do not appear to represent a sufficiently random sample,<sup>2</sup> or if the customer falls into one of the groups listed under [Requirement 3](#).

The PrA will confirm with Suppliers which customers have been chosen for the sample and request alternatives for any customers that have been rejected. The Supplier will note the customers that have been accepted by the PrA as part of the sample. Correspondence as per Requirements 1 and 2 would be undertaken via email.

The Supplier will not be required by the BSC to inform the customer that they are part of the Profiling Sample, although Suppliers may wish to do so. The Modification Group has sought legal advice in this area from BSCCo, and a copy of this advice is reproduced in Appendix 1 for information.

The PrA will confirm/reject Sample Participants by the first Working Day in February each year. The Supplier will be obliged to provide randomly-selected replacement customers for any which are rejected by the PrA.

### **3.2 Details of the installation of metering equipment process**

P223 proposes that the HH consumption data necessary for profiling will be obtained by installing a meter with HH capability at each sample customer's premises.

The Modification Group has sought legal advice from BSCCo on whether the installation of HH capable metering at a NHH site is allowable under existing primary legislation. BSCCo has not established any existing legislation which would prevent such an installation. A copy of the legal advice is provided in Appendix 1 for information.

The Supplier may choose to procure, install and maintain the necessary metering for a customer using either its own Supplier Agents or the PrA's nominated agents. Regardless of which option is chosen, the agents must either be the Supplier's or PrA's NHHDC, NHHDA, MAP and MOA. There is no option to mix the agents i.e. choose the PrA's NHHDC and MOA but retain the services of the Supplier's NHHDC. If the Supplier elects to use the PrA's nominated agents, then those agents will therefore undertake all of the following roles for that customer:

- Obtaining and installing the HH-capable meter (MAP/MOA – new process);
- Collecting normal NHH data from that meter for Settlement (NHHDC – no change to existing industry processes);
- Aggregating the normal NHH data for Settlement (NHHDA – no change to existing industry processes); and
- Collecting HH data from the meter for profiling (NHHDC – new process).

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<sup>2</sup> The PrA will have the ability to inform the Performance Assurance Board (PAB) via BSCCo if it has reason to believe (from the customer details provided) that any Supplier has not selected customers in a random manner and is thus in breach of the BSC. Should any such circumstances occur, the PAB will deal with the suspected non-compliance under its existing assurance processes.

If the Supplier chooses to use its own nominated agents, then the Supplier's own agents will be responsible for fulfilling all of the above roles.

Please note that customers that already have a HH capable 'smart' meter will not be required to have their meter replaced, as this existing meter can be used to collect HH data for the profiling sample.

Note that the appointment and de-appointment of Party Agents in both cases follows the standard existing appointment/de-appointment processes and timescales under the BSC.

- **Requirement 6A: *If the Supplier utilises the option to use the PrA's nominated Agents and MAP***

The Supplier will appoint the PrA's nominated agents and de-appoint its existing agents using the current Party Agent appointment/de-appointment processes and appropriate Data Transfer Catalogue flow e.g. D0155 'Notification of New Meter Operator or Data Collector Appointment and Terms' and D0209 'Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator'.

The PrA will inform its nominated agents which MSIDs have been identified by the Supplier and the MOA will contact the customer (using contact information obtained from the Supplier) and swap out the customer's existing meter for a suitable Half Hourly capable meter (please refer to Section 3.3 for details of the minimum metering requirements).

- **Requirement 6B: *If PrA's nominated MOA declares that the customer is not suitable to have the new metering equipment fitted***

The PrA will re-contact the Supplier and the customer is rejected. The process of randomly recruiting a replacement customer will begin as per Requirement 3.

- **Requirement 7A: *If the Supplier utilises the option to use its own Agents and MAP***

The Supplier will inform its own agents which MSIDs have been identified by the Supplier to be part of the PrA Sample.

The MOA will contact the customer and will swap out the customer's existing meter for a suitable HH capable meter.

- **Requirement 7B: *If MOA declares that the customer is not suitable to have the new metering equipment fitted***

The MOA will inform the Supplier, who will consequently inform the PrA that the customer's meter cannot be swapped. The PrA will reject the customer and the process of randomly recruiting a replacement customer will begin as per Requirement 3.

- **Requirement 8: *If MOA informs that the customer is suitable***

The MOA will fit equipment provided by the MAP and use current industry processes.

### 3.3 Details of funding of agents and meter installation

- **Requirement 9: PrA is required to provide the funding for the recruitment and meter installation process**

The PrA will fund the cost of obtaining the metering equipment for the Supplier if:

- The Supplier uses the PrA's Agent services; or
- The Supplier's own agents install a meter that meets the minimum metering requirements required to obtain the HH data for the PrA. The Supplier will invoice the PrA for the cost of the meter.

For those Suppliers that wish to use the PrA's nominated agents there will be no direct cost to the Supplier for the agency services provided by the PrA. However, the costs incurred by the PrA in funding metering installations and agency services will ultimately form part of the PrA's overall service costs, which are recovered by BSCCo from BSC Parties according to their market share.

For those Suppliers that choose to use their own Supplier Agents, the PrA will offer an annual rebate that includes:

- The cost of installing the meter;
- The associated MOA costs; and
- The airtime and dial costs for the NHHDC to collect the HH data.

The rebate will exclude the costs of collecting normal NHH data for Settlement and associated NHHDA costs, since no changes are proposed to these processes.

This rebate will be calculated on an annual basis and based on the average cost to the PrA in the previous year of providing its own services in these areas for a Sample Participant.

### 3.4 Details of minimum metering requirements

- **Requirement 10: Minimum requirement specifications for the metering solution**

The HH capable meter must:

- a) Comply with Schedule 7 of the Electricity Act;
- b) Be Ofgem-approved;
- c) Have the capability for the communications link to be replaced without needing to replace the meter or invalidating its certification;
- d) Have protocols that are compatible with the practices of the appointed NHHDC;
- e) Physically display NHH consumption information (the NHHDC will obtain the HH data by remote access e.g. GSM);
- f) Comply with Code of Practice (CoP) A (Reference 6); and

- g) Meet the selected provisions as shown in the table below of CoP Five (Reference 3) and CoP Eight (Reference 4).

Area of requirements	Document	Sections
Accuracy	<a href="#">CoP8 Issue 1 v4.0</a>	4.2 and 5.2
Measurement criteria	<a href="#">CoP8 Issue 1 v4.0</a>	4.1, 5.1 and 6.3.1
Displays	<a href="#">CoP8 Issue 1 v4.0</a>	6.3
Sealing arrangements	<a href="#">CoP8 Issue 1 v4.0</a>	5.2.6, 5.2.8 and 7.3
Communications	<a href="#">CoP5 Issue 6 v5.0</a>	5.6
Security requirements	<a href="#">CoP5 Issue 6 v5.0</a>	5.6
Data Storage	<a href="#">CoP5 Issue 6 v5.0</a>	5.5.1
Time keeping	<a href="#">CoP5 Issue 6 v5.0</a>	5.5.2
Monitoring facilities	<a href="#">CoP5 Issue 6 v5.0</a>	5.5.3

### 3.5 Details of the data collection process

- **Requirement 11: NHHDC obligations**

This requirement applies regardless of whether the Supplier's or PrA's nominated NHHDC is utilised. The NHHDC shall:

- Collect NHH data from MOA fitted equipment (as currently);
- Calculate meter advances based on the NHH data collected or by obtaining a NHH register read from the meter (as currently);
- Submit the calculated Annualised Advance (AA) via a D0019 'Metering System EAC/AA' to the NHHDA for Settlement purposes and a copy to the Supplier (as per existing industry processes);
- Remotely collect and provide HH data to the PrA within 10 Working Days of the start of each month. The NHHDC will batch data from all MSIDs into one data file, and send this via either a standard email template/format or another method as agreed between the NHHDC, Supplier and the PrA. This will be undertaken on a monthly basis for Profile production whilst sending a copy to the Supplier for its own research purposes. Obtaining the data on a monthly basis will enable the PrA to pick up any events such as Change of Supplier.



- e) In line with the existing BSC requirement on the Supplier (BSC Section L5.1 'Ownership of Metering Data'), the Supplier shall provide HH data to the customer if requested by the customer. This is not a mandatory requirement of P223 and, unless requested, the Supplier would not pass to the customer such data, as there is the risk that the participant's future consumption patterns may consequently alter. If the Supplier does pass HH data, they will inform the PrA of this occurrence.

For the avoidance of doubt, the PrA itself (or the PrA's agents) shall not provide HH data to the customer from which it has been obtained. If the customer requests such data from the PrA/ or the PrA's agents, then the PrA/its agents shall refer the customer to their Supplier.

The Modification Group has sought legal advice from BSCCo as to whether it is allowable for a Supplier to pass a customer's HH consumption data to the PrA without the customer's express permission. BSCCo has not identified any reason why the BSC could not place a requirement on Suppliers to provide this HH information to the PrA in respect of NHH customers. However, in complying with this requirement, Suppliers will need to be mindful of relevant Data Protection legislation, and may wish to review their Terms and Conditions in this area. A copy of the legal advice is provided in Appendix 1 for information.

If the NHHDC becomes unable to obtain HH data for a customer (e.g. due to a communications link failure with the meter), the NHHDC shall notify the Supplier (if the NHHDC is the Supplier's own agent) or the PrA (if the NHHDC is the PrA's preferred agent). The Supplier or the PrA (as appropriate, and with the support of the MOA if necessary) shall be responsible for investigating and rectifying the problem (e.g. repairing the meter).

If the PrA notifies the Supplier that data has not been received from the NHHDC for a Sample Participant (where the NHHDC is the Supplier's own agent), then the Supplier shall also be responsible for investigating and rectifying the problem with support from the NHHDC and MOA as required. However, this requirement does not apply where there has been a Change of Supplier for the customer. The obligations relating to a Change of Supplier are set out separately in [Requirement 12](#) below.

### **3.6 Details of the [Change of Supplier \(CoS\) / Change of Tenant \(CoT\)](#) Process**

- **[Requirement 12: Change of Supplier](#)**

Under the Proposed Modification, it will be the responsibility of the PrA to identify where a Change of Supplier (CoS) has occurred and to contact the New Supplier to inform them that the customer is part of the PrA sample.

The actual CoS process remains unaltered from existing industry processes. If the Supplier **uses the Supplier's own agents** for the recruitment and data collection processes, then the New Supplier may not know that the customer is a PrA Sample Participant. In such instances the PrA may no longer receive data from the Supplier's NHHDC. In such circumstances, the PrA will use ECOES to find out whether a CoS has occurred. If the PrA establishes that a CoS has taken place, the PrA will contact the New Supplier for the customer. If ECOES indicates that a CoS has not occurred, the PrA shall contact the Old Supplier to establish whether there is another reason why it is no longer receiving data for that customer (see [Requirement 11](#)).

In instances where the Supplier has **used the PrA's nominated agents**, the PrA's nominated agents will be de-appointed on CoS in accordance with existing industry processes. The PrA will contact the New Supplier (using information from ECOES on who the New Supplier is, and through the dedicated profiling contact at the New Supplier) to inform the New Supplier that the customer is part of the PrA sample.

In both scenarios, the New Supplier will have a choice between either retaining the existing customer in the sample, or retiring that customer from the sample and providing a replacement Sample Participant with another MSID randomly selected from that Supplier's customers. The New Supplier has the option to use its own agent services or the PrA's nominated agents for the customer. The PrA will update its records to:

- **Where the existing customer is retained:**
  - Reflect the New Supplier contact details for the existing customer;
  - Cease any further rebates to the Old Supplier (if the Old Supplier had used its own agents); and
  - Ensure that future rebates are issued to the New Supplier (if the New Supplier chooses to use its own agents), or
- **Where the existing customer is retired and a replacement customer provided:**
  - Remove the old customer from the list of Sample Participants;
  - Cease any further rebates to the Old Supplier (if the Old Supplier had used its own agents);
  - Add the new customer to the list of Sample Participants; and
  - Ensure that future rebates are issued to the New Supplier (if the New Supplier chooses to use its own agents).

If on a CoS the existing Sample Participant leaves the PrA sample, then their HH capable meter will be classed by the Old Supplier/PrA as a lost asset and the New Supplier will take ongoing responsibility for the maintenance of that meter under existing industry processes.

- **Requirement 13: Change of Tenant**

The PrA will re-confirm the customer details of each Sample Participants with the relevant Suppliers on a yearly basis, and in particular will request information on any changes of tenant that have occurred during the year.

The Supplier must inform the PrA on a yearly basis if there has been a change of tenant for any of its customers who form part of the Profiling Sample. The PrA will review the data collected from the new tenant and will decide where the new tenant sits within the sampling frame. Where appropriate the PrA will consequently review its recruitment requirements as necessary (e.g. if the CoT has created a shortage of a particular type of Sample Participants in a specific Profile Class).

### 3.7 Details of the **Supplier responsibility for agents process**

- **Requirement 14: *Supplier's responsibility for the agents and Terms & Conditions***

The Supplier will remain responsible for the performance of all its agents, including where the PrA's agents have been appointed.

In instances where the Supplier chooses to use the PrA's nominated agents, the PrA will draft standard Terms and Conditions for this service in the form of a generic contractual arrangement between the PrA and Suppliers. No exchange of finances or commercial detailed negotiations will occur (i.e. the PrA will not provide any additional services besides the normal MAP, MOA, NHHDC, NHHDA and Profiling services). There will be the opportunity for the Supplier to amend the Terms and Conditions drafted by the PrA.

## 4 Detailed Alternative Modification Solution Requirements

The requirements for the Alternative Modification are identical to that of the Proposed Modification other than where a Change of Supplier is concerned (Requirement 12).

Under the Alternative Modification, where a CoS occurs, the customer will be lost from the PrA sample.

There will be no obligation on the Old Supplier, New Supplier or PrA to retain the customer. The meter will therefore be classed by the Old Supplier/PrA as a lost asset and the New Supplier will take ongoing responsibility for the maintenance of that meter under existing industry processes. There will be no responsibility on the Old or New Supplier to provide a replacement customer following a CoS.

This shortfall will be taken into account at the following year's sample recruitment process as explained under [Requirement 1](#) of the Proposed Modification, where the number of required customers will again be pro-rated across all Suppliers by market share.

In instances where the PrA's nominated agents had been used, the PrA will become aware of the Change of Supplier at the point of agent de-appointment. Where the Supplier had used its own agents, the PrA will stop receiving data for the customer without any notification.<sup>3</sup> In these circumstances, the PrA will use ECOES to identify whether a CoS has occurred. Following a CoS, the PrA will update its records to:

- Remove the old customer from the list of Sample Participants (in order that the PrA can correctly identify the shortfall in the sample for the following year); and
- Cease any further rebates to the Old Supplier (where the Old Supplier used its own agents).

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<sup>3</sup> If ECOES indicates that a CoS has not occurred, the PrA shall contact the Old Supplier to establish whether there is another reason why it is no longer receiving data for that customer (see [Requirement 11](#)).

## 5 Estimated impact of modification on systems, processes and documentation

### a Impact on BSC Systems and processes

System / Process	Impact of Proposed/Alternative Modification
PrA processes	The PrA will be required to support the new PrA process e.g. recruitment, CoS, CoT, etc, as detailed in this Requirements Specification.

### b Impact on BSC Agent contractual arrangements

BSC Agent Contract	Impact of Proposed/Alternative Modification
LogicaCMG (BMRA, CRA, CDCA, SAA, ECVA, TAA, FAA)	None
Cap Gemini (SVAAO)	None
PwC (BSC Auditor, Certification Agent)	None
IMServ (Profile Administrator)	The Profile Administrator will need to implement and operate the new PrA process as proposed by P223.
EASL (Teleswitch Agent)	None

### c Impact on BSC Parties and Party Agents

**Suppliers** will be required to fulfil the obligations of:

- The provision to the PrA of applicable MSIDs for the Profiling Sample;
- The provision of a metering solution which will deliver the PrA data requirements; and
- The responsibility for collecting Half Hourly data and sending it to the PrA.

**NHHDCs** will be required to:

- Collect NHH data from MOA fitted equipment (as currently);
- Calculate meter advances based on the NHH data collected or by obtaining a NHH register read from the meter (as currently);
- Submit the calculated Annualised Advance via a D0019 'Metering System EAC/AA' to the NHHDA for Settlement purposes and a copy to the Supplier as per existing industry processes (using existing industry processes); and
- Collect HH data remotely and provide the HH data to the PrA (new process). This will be undertaken on a monthly basis for Profile production whilst sending a copy to the Supplier for its own research purposes.

**MOAs** will be required to support the metering solution for the new PrA process.

No changes are required to any NHHDA processes.

**d Impact on Transmission Company**

None.

**e Impact on BSCCo**

Area of Business	Impact of Proposed/Alternative Modification
Contractual	Contractual amendments to the terms and charges in the PrA contract will need to be drafted, negotiated and agreed with the PrA. This may also have an impact depending on date of implementation on the re-procurement activity of the PrA contract in 2009/10 with the new contract starting on 1 April 2010.
Operational	BSCCo will be required to facilitate the new annual P223 recruitment process, by pro-rating the PrA's number of required customers across Suppliers by market share.
Change management	BSCCo will be required to oversee the implementation of P223, including any necessary changes to BSC Systems, processes and documentation.

**f Impact on Code**

Code Section	Impact of Proposed/Alternative Modification
Section S 'Supplier Volume Allocation'	Changes to sub sections 2.7.5 and 4.2 would be required to reflect the new process that is proposed under P223.

**g Impact on Code Subsidiary Documents**

Document	Impact of Proposed/Alternative Modification
Profile Administrator Service Description	Changes would be required to reflect the new process that is proposed under P223.
BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems registered in SMRS'	
BSCP510 'The Provision of Sampling Data to the Profile Administrator'	
BSCP514 'SVA meter operations for Metering Systems registered in SMRS'	

**h Impact on Core Industry Documents/System Operator-Transmission Owner Code**

None.

**i Impact on other configurable items**

None.

**j Impact on BSCCo Memorandum and Articles of Association**

None.

**k Impact on governance and regulatory framework**

None.

## **6 Development Process**

For the purposes of the impact assessment, respondents should assume that P223 would be implemented as a stand-alone development project managed by BSCCo.

## **7 Terms Used In This Document**

Other acronyms and defined terms take the meanings defined in the Code.

<b>Acronym/Term</b>	<b>Definition</b>
BSCP	Balancing and Settlement Code Procedures
CoP	Code of Practice
CoS	Change of Supplier
CoT	Change of Tenant
EAC/AA	Estimated Annual Consumption / Annualised Advance
ECOES	Electricity Central Online Enquiry Service
GSM	Global System for Mobile
GSP	Grid Supply Point
HH	Half Hourly
IWA	Initial Written Assessment
MAP	Meter Asset Provider
MOA	Meter Operator Agent
MSID	Metering System Identifier
NHH	Non Half Hourly
NHHDA	Non Half Hourly Data Aggregator
NHHDC	Non Half Hourly Data Collector
PrA	Profile Administrator
RTS	Radio Teleswitch Service

Acronym/Term	Definition
SSC	Standard Settlement Class
SME	Small and Medium Enterprises
SMRA	Supplier Meter Registration Service

## 8 Document Control

### 8.1 Authorities

Version	Date	Author	Reviewer	Reason for review
0.1	21/04/08	Sherwin Cotta	Kevin Spencer/ Steve Francis/ Justin Andrews/ Kathryn Coffin	For technical review / Quality review
0.2	23/04/08	Sherwin Cotta	P223 Modification Group	For Modification Group review
0.4	06/05/08	Sherwin Cotta	Kathryn Coffin	For review
0.5	07/05/08	Sherwin Cotta	P223 Modification Group	For Modification Group review
1.0	14/05/08	P223 Modification Group		For impact assessment

### 8.2 References

Ref.	Document Title (webpage)	Owner	Issue Date	Version
1	<a href="#">P223 'Profile Administrator Service' Initial Written Assessment</a>	ELEXON	04/04/08	1.0
2	<a href="#">Issue 29 'Profile Administrator (PrA) Model' - Panel paper 135/01e</a>	ELEXON	11/01/08	1.0
3	<a href="#">Code of Practice Five</a> 'Code of Practice for the metering of Energy transfers with a Maximum Demand of up to (and including) 1MW for Settlement purposes'	ELEXON	28/02/08	5.0
4	<a href="#">Code of Practice Eight</a> 'Code of Practice for the metering of Import Active Energy via Low Voltage Circuits for Non Half Hourly Settlement purposes'	ELEXON	23/08/07	4.0

Ref.	Document Title (webpage)	Owner	Issue Date	Version
5	<a href="#">BSCP510 'The Provision of Sampling Data to the Profile Administrator'</a>	ELEXON	BETTA effective date	2.0
6	<a href="#">Code of Practice A</a> <i>'Code of Practice for the metering of Electricity Transfers between the National Grid Company plc and public Electricity Suppliers using the national interim metering scheme'</i>	ELEXON	21/11/06	n/a

## 9 Appendix 1: Legal advice

A copy of the BSCCo legal advice referred to in this Specification is attached as a separate document, Attachment 1.

## 10 Appendix 2: Flow charts of the proposed P223 processes

Please see Attachment 2.

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