



## Change Proposal Circular: CPC00707: Impact Assessment of CP1366

### Responses for CP1366 'Data Quality Obligations for Outgoing Supplier Agents'

#### Summary of Responses for CP1366

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Imserv Europe Ltd	HHDC/DA and MOP, NHHDC/DA and MOP	Yes	Yes	30
TMA Data Management LTD	HHDC, HHDA, NHHDC, NHHDA	No	Yes	90
Western Power Distribution	Distributor, MOA	No	Yes	60
Scottish Power	Supplier, NHHDC, NHHDA, Generator	Yes	No	n/a
Electricity North West Ltd	LDSO	Yes	Yes	n/a
EDF Energy	Supplier, NHH Agents and HH MOP	Yes	No	n/a
Siemens Metering, Communications & Services	HHDC, HHDA, HHMO, NHHDC, NHHDA, NHHMO	No	Yes	90
Npower	Supplier, HH and NHH Agents	Yes	Yes	180
British Gas	Supplier	Yes	Yes	n/a
STARK	NHHDC	Yes	Yes	n/a
Lowri Beck Services Ltd	NHHMO, NHHDA, NHHDC	No	Yes	60

## Detailed Impact Assessment Responses for CP1366

Organisation	Agree?	Impacted?	Comments
Imserv Europe Ltd	Yes	Yes	<p><b>Agree change comment</b> – Yes</p> <p><b>For which role is your organisation impacted?</b> NHHDC/NHHMOA</p> <p><b>Please state what the impact is</b> – Additional Workarounds/communication will need to be introduced to deal with queries where data is not available to assist in resolving issues</p> <p><b>Lead time comment</b> - Changes will be process and not system and may not be detailed until queries are received where existing processes do not suffice</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Time taken to resolve issues, chasing other people to get to a resolution</p> <p><b>Associated costs comment</b> – Resource costs so difficult to quantify, estimate 0.25FTE</p> <p><b>Any other comments</b> - We support the ownership of data for the periods of appointment, but where inaccurate appointments are made we will be reliant on the supplier who has appointed us to assist in the resolution of queries when it involves other parties such as NHHMOA</p>
TMA Data Management LTD	No	Yes	<p><b>Agree change comment</b> – The intentions of the CP are honourable but the actual change does very little except add a vague obligation on NHHDC's and NHHMO's.</p> <p>The CP raises some serious system issues as the appointment effective from and to dates are used by all systems to determine which agent should receive which information. How can an agent at the same time, respect the appointment time span and be able to send the information out with the appointment time span?</p> <p>The CP is also in opposition to the NHHDC appointment responsibility period description in BSCP504 1.2.1 "The appointment of a NHHDC in SMRS by the Associated Supplier to a SVA MS is effective from a specified calendar day. From that calendar day onwards the NHHDC is responsible for all Settlement Days (SDs) within the period of its Associated Supplier's registration, until superseded by a new NHHDC, providing there is no Change of Measurement Class (CoMC) from Non-Half Hourly (NHH) to Half Hourly (HH) metering or vice versa."</p> <p><b>For which role is your organisation impacted?</b> NHHDC</p> <p><b>Please state what the impact is</b> – System</p> <p><b>Lead time comment</b> – 90 days</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – High system costs</p> <p><b>Any other comments</b> – n/a</p>

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Organisation	Agree?	Impacted?	Comments
Western Power Distribution	No	Yes	<p><b>Agree change comment</b> – We support the principles and aims of this CP but don't believe the suggested red-lining will achieve the desired outcome. An obligation to "co-operate" is too vague. Unless there are clear requirements as to what this actually means the old agent has to do then it will probably mean different things to different parties. For example in a case where a new MOA believes the METDs sent by the old MOA are incorrect then exactly what action does the old agent need to take?</p> <p>We agree that the "old" agent should not respond to a query with an "I'm no longer the agent so not my problem any more" type reply but it is very difficult to mandate what they should do. Hence the need for clear requirements.</p> <p>Also, the old agent has no contractual relationship with the new agent. Where a new agent has a query and attempting to resolve it results in work for the old agent, what are the commercial arrangements for recovering the cost of the work, particularly if the old agent is not the source of the problem?</p> <p>We are therefore unable to support the CP in its current form. If it could be amended to show specific, required actions in various circumstances then we would reconsider.</p> <p><b>For which role is your organisation impacted?</b> MOA</p> <p><b>Please state what the impact is</b> – The requirement is not clear. The impact is potentially nothing as we don't normally refuse to cooperate to resolve problems. The impact is also potentially significant as other parties and the BSC auditor views on the extent of our level of cooperation may mean we have to do extra work.</p> <p><b>Lead time comment</b> – 60 days This would probably not require system changes just, potentially, working practice changes.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – Unknown</p> <p><b>Any other comments</b> – n/a</p>
Scottish Power	Yes	No	<p><b>Agree change comment</b> – n/a</p> <p><b>For which role is your organisation impacted?</b> n/a</p> <p><b>Please state what the impact is</b> – n/a</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> n/a</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> –n/a</p>
Electricity North West Ltd	Yes	Yes	<p><b>Agree change comment</b> – Yes I agree with this change as it should help with some of the data quality issues we are experiencing when the DC or MOp are no longer appointed to the MPAN.</p> <p><b>For which role is your organisation impacted?</b> Distributor</p>

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			<p><b>Please state what the impact is</b> – We have data quality issues and as a result of the agent no longer being appointed they do not correct the data and send updates to the current appointed agent.</p> <p><b>Lead time comment</b> – No impact.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No adverse impact.</p> <p><b>Associated costs comment</b> – No associated costs.</p> <p><b>Any other comments</b> – No further comments.</p>
EDF Energy	Yes	No	<p><b>Agree change comment</b> – We feel that these issues are covered fully in Party Service Line 100. We also note that reference to this Party Service Line is detailed in sections of BSCPs this CP intends to change. It would, therefore, on an initial view seem that we are just duplicating details in two places. However, we believe that since majority of Party Service Lines were removed leaving just one that this has led to a lack of focus on details within this Party Service Line. Therefore, we can see a need to add these comments into BSCPs.</p> <p>Any changes made by a previous Agent would need to be communicated to all subsequent appointed Agents with agreement that they in turn would inform corresponding supplier for purpose of completeness. We do not know if this needs to be explicitly stated in changed text.</p> <p>There would be a reliance on current DC to account for any consumption/ data changes and ensure that these are submitted to Settlement via appropriate channels, so as to avoid the possibility of contributing to overall Imbalance.</p> <p><b>For which role is your organisation impacted?</b> n/a</p> <p><b>Please state what the impact is</b> – n/a</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> n/a</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> – We would query if in both sets of changes new detail added should be were reference to Party Service Line 100 is detailed. Both additions are related to obligations that are detailed within that Party Service Line and so keeping these together could be appropriate. For BSCP514 that would be against section 2.2.2 (d) and for BSCP504 against second paragraph of section 1.2.5.</p>
Siemens Metering, Communications & Services	No	Yes	<p><b>Agree change comment</b> –</p> <p>We believe that further clarification and expansion of requirements is needed in order for CP1366 to provide any benefit to the industry.</p> <p>The Issue 41 workgroup made further recommendations, such as a query management process, which could be useful once</p>

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			<p>implemented. However, we do not believe that CP1366 alone will really improve matters, and so would question the value of implementing this proposal without further confirmation that some of the other suggestions from the group are also to be progressed.</p> <p>We would also request some additional clarification in BSCPs 504 and 514 on the following points:</p> <ul style="list-style-type: none"> <li>• Exactly what kind of errors does this cover? Is it just missing or inaccurate flows (in terms of the data values), or mismatches in effective dates as well? There are bound to be some grey areas.</li> <li>• Who is going to decide when an issue has been resolved in the event of a dispute between the agents? If this is not clearly defined, then it will require further time and effort to resolve, and may be difficult to assess during the BSC audit.</li> <li>• What are the timescales for raising issues with the old agent? Will there be a cut-off point after which queries cannot be raised?</li> </ul> <p>The Justification for Change section states the following:</p> <p style="padding-left: 40px;">With the rollout of SMART metering on the horizon, all suppliers will no doubt uncover many data quality issues they don't yet know about and it is critical that a robust process is implemented to ensure customers are not detrimentally impacted by the correction of these errors.</p> <p>While we would agree with the need for a robust process for maintaining data quality in readiness for the Smart rollout, on its own we don't see how this proposed amendment to the BSCPs will make this happen.</p> <p><b>For which role is your organisation impacted?</b> MO &amp; DC</p> <p><b>Please state what the impact is</b> – Process Changes would be required.</p> <p><b>Lead time comment</b> – 90</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b></p> <p>The volume of changes that impact Agent's systems &amp; processes, which are being targeted at the June Release, is growing rapidly. While we appreciate that none of these have been approved (yet), we would ask that this is taken into consideration, so as not to introduce the unnecessary risk of numerous changes to one participant role in the same release.</p> <p><b>Associated costs comment</b> – Unable to provide costs at this time.</p> <p><b>Any other comments</b> – n/a</p>

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Organisation	Agree?	Impacted?	Comments
Npower	Yes	Yes	<p><b>Agree change comment</b> – Although we agree in principle to this change, we feel the Change Proposal lacks detail. We support what this CP seeks to achieve and have been actively involved in the Issue 41 working group. However, we feel there needs to be more detail provided around the timescales and how the new obligations would be monitored / audited. Also, we believe there needs to be an agreed process in place to allow these new obligations to be successful.</p> <p><b>For which role is your organisation impacted?</b> Supplier, NHHDC and NHHMO</p> <p><b>Please state what the impact is</b> – As we are currently a Supplier and Supplier Agent, these new obligations would require us to change the processes we currently have for addressing data quality issues both on losses and gains.</p> <p><b>Lead time comment</b> – 180 - Although no system changes are envisaged at present, we believe much more work needs to be undertaken to make the process for managing data quality issues clearer and auditable.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes, we feel at present there is more work to be done to define the processes that will be used. If this CP is agreed at the next SVG will that leave enough time to design the new process?</p> <p><b>Associated costs comment</b> – No costs available at present.</p> <p><b>Any other comments</b> – No</p>
British Gas	Yes	Yes	<p><b>Agree change comment</b> – We support these changes for the reasons outlined in the change.</p> <p><b>For which role is your organisation impacted?</b> Supplier</p> <p><b>Please state what the impact is</b> – This should assist with resolving data quality issues and chasing missing flows</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> – The change appears to remove part of the Supplier hub process that we have to operate. i.e. if we have a data issue caused by a previous MOP, then our MOP would tell us, we would then tell the old supplier, who would then contact their MOP and then any correction would come back through the same route.. If this is correct then this would be a beneficial change for suppliers as it cuts out some of the steps that make it an unworkable process and makes the agents (experts) talk to each other to get these types of issues sorted.</p> <p>The question we would ask is how enforceable is this and how far is an old agent expected to go. Are they mandated to send corrected data flows or are they only mandated to provide the information / answer the questions to enable the new agent to correct their records. I would think a corrected data flow would be needed in most cases for audit purposes. I'm not sure if a BSCP would ordinarily explicitly mandate that a corrected data flow should be sent by the old agent where required by the new agent, but it would seem sensible to avoid old and new agents getting into debates about interpretation of the BSCP when requesting flows be sent.</p>

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STARK	Yes	Yes	<p><b>Agree change comment</b> – Improved and Continued Cooperation even after Termination is important</p> <p><b>For which role is your organisation impacted?</b> NHHDC</p> <p><b>Please state what the impact is</b> – We have had requests to action requests relating to data quality after deappointment but the relevant information had not been provided. If the means by which such information could be received were expanded then the impact would be positive with regard to issues that it may not have been possible to resolve in the lifetime of the appointment.</p> <p><b>Lead time comment</b> – n/a</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> No</p> <p><b>Associated costs comment</b> – n/a</p> <p><b>Any other comments</b> – n/a</p>
Lowri Beck Services Ltd	No	Yes	<p><b>Agree change comment</b> –</p> <p>NHHDC - We feel that the proposed solution would only practically work if the 'issue' occurred during the old Supplier / DC period and is greater than RF. In the case of multiple churns, a "fix" could involve a chain of events that could take time to get to the bottom of and involve resources (teams) from numerous agents, which would seem costly for the agents and as they are out of contract there would be no incentive to prioritise this work over working on mpans they were currently appointed to.</p> <p>An example of this is all D0086's where we don't receive correct MTD's/MRH would have to rely on the active Agent chasing other participants (with no guarantee it was even the previous DC/MOP before you that caused the issue), this could result in 3 or 4 agents involved in resolving 1 MPAN where really this could have been resolved by the active agents alone.</p> <p>NHHMO – We feel that, again, the "old" Mop will not be suitably incentivized to change the way they currently work as they would not be incentivised to work on mpans for which they have no current contract above mpans for which they are appointed to. Additionally, although sometimes the old MOP may have the data that is needed, in some cases, the resolution might require a site visit, which they would not want to do/couldn't really do as they have no contract with the current supplier, will not necessarily have the current customer details and from the customer's perspective should not turning up on customer site when they are not working on behalf of the customer's supplier.</p> <p><b>For which role is your organisation impacted?</b> NHHDC, NHHMO</p> <p><b>Please state what the impact is</b> – Costs – systems changes/extra resources</p> <p>System changes to allow amendment of data processing for MPAN's we are no longer appointed to.</p> <p>Process Changes/training/ cost of more resource. In addition MOP site visit jobs to be raised for sites where we are no longer the active MOP</p> <p><b>Lead time comment</b> – 60 - Business Requirement Specifications will need to be created to prepare for the changes, further to this</p>

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			<p>we would have to wait for system changes from our third party providers followed by testing. Once happy with the change we would require changes to Local Working instructions / Business Processes and finally staff training in readiness for the release.</p> <p><b>Would implementation in the proposed Release have an adverse impact on your organisation?</b> Yes</p> <p><b>Associated costs comment</b> – Actual figures cannot be provided at this moment of time.</p> <p><b>Any other comments</b> – n/a</p>

## Comments received on the redlined text for CP1366

Comments on the redline text					
No.	Organisation	Document name	Location	Severity Code	Comments
1	Imserv Europe Ltd	BSCP504	1.2.5	M	<p>Additional paragraph to be added to support where data is not available or system constraints prevent issue to be resolved via DTC flows as per the summary document of CP1366</p> <p>“It was recognised that there may be some system constraints to implement this change using DTC flows, however suitable alternatives (such as flat files and emails) could be used which would require auditable data being maintained.”</p> <p><b>“Where information has not been provided to the previous Agent then the new and old agent(s) along with the supplier shall work together to resolve the issue”</b></p>
2	Imserv Europe Ltd	BSCP514	2.2.2	M	<p>Additional paragraph to be added to support where data is not available or system constraints prevent issue to be resolved via DTC flows as per the summary document of CP1366</p> <p>“It was recognised that there may be some system constraints to implement this change using DTC flows, however suitable alternatives (such as flat files and emails) could be used which would require auditable data being maintained.”</p> <p><b>“Where information has not been provided to the previous Agent then the new and old agent(s) along with the supplier shall work together to resolve the issue”</b></p>
3	STARK	BSCP504	1.2.5		<p>As an AMR NHHDC we have had many occasions where the quality of data received or lack of it from previous agents has seriously delayed the ability to issue data or the need to make corrections. At times it is the reticence of disappointed agents to assist by absolving responsibility which has caused issues in correcting erroneous data.</p> <p>This has also been due at times to inability to deliver by D-Flow or our system not processing information received on a D-Flow. This amendment is therefore a positive initiative.</p>