Draft Change Proposal – F40/01	**CP No: 1124** ***Version No: 1.0***

Title *(mandatory by originator)*
Use of alternate methods of validation during the Non-Half Hourly Change of Supplier Process

Description of Problem/Issue *(mandatory by originator)*

Currently, during the change of Supplier (CoS) process, the new Non-Half Hourly Data Collector (NHHDC) is reliant on receiving Meter reading history from the old NHHDC to validate the CoS reading. Where Meter reading history is not received, the Metering System is said to be 'broken'. There are currently no provisions in the Code or Code Subsidiary Documents to describe how the new NHHDC should treat a broken Metering System.

P176 'Clarification of the Requirements for Estimation / Deeming of Meter Readings / Advances in Certain Circumstances to Facilitate Correction of Anomalies in Settlement Consumption' includes the proposal that where the new NHHDC has not received Meter reading history after using reasonable endeavours to obtain it, the new NHHDC must deem a CoS Meter reading backwards using the initial Estimated Annualised Consumption (EAC) and the first subsequent Meter reading.

The new NHHDC may however have a CoS reading which could not be entered into Settlements due to the new NHHDC not having Meter reading history to validate it. For example:

- The new NHHDC has a CoS reading provided by the Supplier or the customer, however it may not have received Meter reading history from the old NHHDC meaning that the new NHHDC is unable to validate the CoS reading; or

- The NHHDC may have a CoS reading and may have received a previous Meter reading from the old NHHDC or new Supplier or an early reading from the Supplier, but not received an accompanying EAC. This also scenario also means that the new NHHDC is unable to validate the CoS reading.

It would be more appropriate if the new NHHDC could use an actual Meter reading taken prior to the CoS and an actual Meter reading taken after the CoS; or use the initial Estimated Annualised Consumption (EAC) and the first subsequent Meter reading available to validate the CoS reading that they have rather than deeming a reading.

Attachment 1 shows the issues and proposed process of this validation in diagrammatic form.

Proposed Solution(s) *(mandatory by originator)*

BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' currently contains rules in Appendix 4.2 'Validate Metered Data' on the minimum requirements that the NHHDC shall carry out to validate a Meter register reading. Whilst this appendix assumes that the reading being validated is after the readings used to validate it, the majority of the appendix applies if the reading being validated is before or between the readings used to validate it. The two validation rules that need a minor amendment to allow for this alternate way to validate a reading follow:

- The validation rule 'Check that the date of Meter reading is after the date of the last valid Meter reading' would need a slight amendment as the date of the reading to be validated in this scenario will be before or between the date of the readings used to validate against. Also the reading(s) used to validate against will not be "valid actual" readings as in the "broken" metering system scenario there will be nothing to validate these against. A footnote should be added to this point to note that where the intention is that a Meter reading is to be validated by subsequent readings or using one reading taken before the reading to be validated and one reading after the reading to be

validated, this rule will not apply, however validation should still occur to check that the date of the Meter reading to be validated is before, or between (as appropriate) the date of the two readings being used to validate it. It should also be noted in this footnote that the readings used for the validation have not been validated.

- The validation rule checking that the advance is not more than twice the expected advance needs a slight amendment. This check currently states that the expected advance should be calculated '(using the EAC times the Profile Coefficient, or some other equivalent method)'. An example of how the expected advance should be calculated where the reading to be validated does not come after other validated readings should be included in this bracket. Possible words follow: 'where the reading to be validated does not come after other validated readings the expected advance could be calculated using either the initial Estimated Annualised Consumption (EAC) and the first Meter reading available or the Annualised Advance (AA) determined from two readings either side of the reading to be validated, times the Profile Coefficient, or some other equivalent method.'

It would probably also be useful to add a sentence at the front of Appendix 4.2 to note that the minimum validation rules contained within BSCP504 apply equally for whether the reading to be validated lies after other valid Meter readings, before other Meter readings or between other Meter readings.

It should be noted that whilst one of the validation rules contained within BSCP504 includes the requirement to check for negative rollover, this check can be carried out when carrying out validation on a reading that does not follow other valid readings since a check should be carried out that there is not negative consumption between the CoS reading and the next Meter register reading or an early reading and the CoS reading.

A change will also need to be made to the P176 BSCP504 drafting if approved, as this drafting states that deeming is mandatory on a CoS if no valid Meter reading is obtained. This mandatory requirement includes deeming backwards where no Meter reading history is obtained after the first subsequent Meter reading has been taken. The text should be made clear that if there is a CoS reading which at the time of the Change of Supplier was unable to be validated, once more readings become available, the actual CoS reading should be validated in preference to deeming a CoS reading using the subsequent Meter readings. Only if this CoS reading fails validation should deeming backwards be carried out. Since, under P176 it would be mandatory to deem a reading backwards, this will make validation of a reading using readings obtained after the date of the CoS a mandatory process as it should be carried out in preference to deeming backwards.

It should be noted that the approval of this Change Proposal (CP) has no dependency on the approval of P176, however there will need to be a change to the text proposed for BSCP504 for P176 as a result of this CP.

Justification for Change *(mandatory by originator)*

The proposed introduction of a 'backward deeming' process by Modification Proposal P176 creates a potential anomaly whereby (if the old NHHDC fails to provide history data), a deemed meter read could be used in settlement in preference to an actual meter reading. This is inconsistent with the general principle that deemed meter readings should be used only as a last resort.

This CP will remove the anomaly, and allow actual meter readings to be used in settlement where available. It will therefore increase the quality of Meter Readings on Change of Supplier (MRoCoS), and reduce the risk of inconsistency between settlement and billing data.

Draft Change Proposal – F40/01	**CP No: 1124** ***Version No: 1.0***

Configurable Items Potentially Affected by Proposed Solution(s) *(optional by Originator)*

BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'

Impact on Core Industry Documents *(optional by originator)*

None

Related Changes and/or Projects *(mandatory by BSCCo)*

As noted above, this Change Proposal is closely related to the backwards deeming process included in Modification Proposal P176 'Clarification of the Requirements for Estimation / Deeming of Meter Readings / Advances in Certain Circumstances to Facilitate Correction of Anomalies in Settlement Consumption'. However, it is not dependent on P176, and could be implemented independently of it.

It should also be noted that this Change Proposal forms part of a 'package' of changes to NHHDC processes proposed by the Customer Transfer Programme. Other changes in this package include:

- Modification Proposal P183 'Additional Mechanisms for Obtaining a valid Change of Supplier Read'
- CP1122, 'Inclusion of the Backstop Process as part of the Change of Supplier Process into Code Subsidiary Documents'
- CP1123, 'Use of Early Readings during the Non-Half Hourly Change of Supplier Process'

It should also be noted that the Supplier Volume Allocation Group (SVG) has been considering a significant change to the validation rules for NHH meter readings – the so-called 'Barasi algorithm' (described in SVG/46/012, available from the ELEXON website). The Barasi algorithm has not yet been raised as a formal Change Proposal or Modification Proposal, but could interact significantly with this CP.

Requested Implementation Date ***(mandatory by originator)***

The next appropriate release, preferably in the same release as P176 in order to remove the identified anomaly as soon as practicable.

Agreed Release/Implementation Date ***(mandatory by BSCCo)***

Draft Change Proposal – F40/01	**CP No: 1124** ***Version No: 1.0***
Originator's Details: ***BCA Name*** ***Organisation SSE*** ***Email Address*** ***Date 8th April 2005***	
Attachments: Attachment 1 'Alternate Validation Methods' - 5 pages	