



Change Proposal Circular – Responses for CPC00722

CPC00722: Impact Assessment of CP1388

Responses for CP1388: Meter Technical Details for Smart Meters

Summary of Responses for CP1388

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
British Gas	Supplier, MOA	No	Yes	365
EDF Energy	Supplier, NHHDC	Yes	Yes	456
Electricity North West Limited	LDSO	Yes	Yes	365
E.ON UK	Supplier, NHHMOA	Yes	Yes	274
Lowri Beck Services Ltd	NHHMOA, NHHDC, NHHDA	Yes	Yes	168
Northern Powergrid	LDSO	Yes	Yes	240
Npower	Supplier, NHHDC, NHHDA, HHDC, HHDA and MOA	Yes, with caveats	Yes	365
ScottishPower	Supplier, Supplier Agent, NHHDC	No	Yes	-

**Any Questions**

If you have any queries, please contact:

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Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Siemens	NHHMOA, NHHDC, NHHDA, HHMOA, HHDC, HHDA	Yes	Yes	540
SSE Energy Supply	Supplier, NHHDC, MOA	No	Yes	365
SSEPD	LDSO	Neutral	No	N/A
TMA	HHDC, HHDC, NHHDC and NHHDA	No	Yes	120
Western Power Distribution	LDSO, MOA	Yes	Yes	365

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Organisation	Agree?	Impacted?	Comments
British Gas	No	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>No, we would prefer to see the current arrangements maintained whereby the MOA retains responsibility for the maintenance and communication of MTD. The MOA has the necessary experience and expertise to continue to fulfil this activity on behalf of suppliers.</p> <p>This response is based upon an assumption that when registration, data processing and aggregation is centralised into the DCC 2-3 years post the initial go live event that the MOA data responsibilities will also transition to some kind of centralised data repository, potentially within the DCC registration systems. We have modelled the options presented in this paper earlier in the year and believe that the current proposal would require significantly more effort to implement than the option where the MOA retains responsibility for MTD.</p> <p>Assuming that this is the case, we would need to make significant changes to support this at that time and therefore referring to the stated overarching principle we believe retaining the MOA as responsible for maintenance and communication of all MTD is the “minimal change” option.</p> <p>We also note that in the earlier industry consultation on Meter Technical Details a number of smaller Suppliers indicated that they would prefer the existing arrangements to continue. Would a further consideration be to allow the sending of the Meter Configuration Flows to be permitted from either the MOA or the Supplier. This would provide flexibility to the market. Under the “Supplier Hub” principle the supplier would still be responsible for his agents and any missing flows would still be the responsibility of the Supplier to escalate to their agent.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as Supplier & MOA.</p>

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			<p>Meter Technical flows are currently the responsibility of the MOA to send out to other industry parties. As a supplier we will need to make significant system changes to enable the new proposed flows to be sent.</p> <p>These changes will impact the following systems for both our business and residential IS infrastructure:</p> <ul style="list-style-type: none"> • Asset management systems • Registration and billing systems • Flow management systems • Meter operator interfaces • Potential changes to contractual arrangements with meter operators • Impacts on customers with customer appointed meter operators. <p>As stated earlier within the MTD working group we believe more time should be taken to consider the best option for communicating meter technical details to industry parties.</p> <p>We are concerned that will be required to make significant changes to our systems only to find that in a couple of years the DCC may hold certain asset details that could be sent direct to industry parties thereby making redundant these changes.</p> <p>We appear to be shoe horning into existing legacy processes new smart information without carrying out an end to end review of how smart processes will work.</p> <p>Due to the significant changes contemplated by the change and the change in parties responsibilities we believe this CP should be accompanied by a BSC modification.</p> <p><u>Comments relating to implementation date</u></p>

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			<p>Due to existing system changes programmed to be delivered into 2014 the June 2014 proposed release date is the earliest we could implement these changes.</p> <p><u>Comments relating to implementation costs</u></p> <p>-</p>
EDF Energy	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>We support the changes and believe these are required to make the processing of Smart Metering data efficient and effective between parties. We have a few comments that we require consideration and feedback.</p> <p><u>General Comments</u></p> <ol style="list-style-type: none"> 1. In the redlining of BSCP 514 section 2.4, the MOA is informing the DC on the Energisation Status, however the Supplier is not informed which we do not believe is correct. This should also be sent to the Distributor. 2. On the appointment flows (D0155) we believe there should be a flag to show that the meter is being operated in a "Smart" Mode. This will enable more efficient processing of both Smart and Dumb meters in a dual process. For instance under current processing when the MOA receives a D0155 in a Dumb process they will be expected to trigger the subsequent required flows. However if the meter is being operated as Smart then the MOA will wait for MCD information from the supplier to before continuing with their process. A suggestion for the flag could be "S" for Smart, "N" Non-Smart, "X" No Meter on MPAN. 3. We do not believe that the process for meter removal (permanent or on a meter exchange) is clear enough, especially in regards to whether a meter reading would be required from the MOP or whether one would be taken by the Supplier. This needs further clarity in the

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			<p>BSCP. Also while the changes in the CP reference change to the routing of the Initial reading of the dumb to smart exchange, it is not clear what would happen to the Final reading on the legacy meter being removed. We assume this would go via the existing route (MOP -> NHHDC -> Supplier) which is fine but needs to be explicit.</p> <p>4. We have a question as to which flows would be sent between parties if there is no meter on-site, either because it has been removed or because no meter has yet been installed. If the last meter removed was a smart would this be a 'short' Smart Device Details flow or a 'short' D0150, again we believe these should be clarified in the BSCP. Please refer this point to point 2 as well.</p> <p>5. We have a question as to whether the current MDD process would be appropriate for maintaining the valid lists of smart meters for validation; will changes be able to be made in enough time? One model that could be used is that for Outstations (where the updates lists are published on the Elexon web-site). A related question is who would maintain the list of valid devices, this might need to be managed under the Smart Energy Code (SEC) who will approve new smart meters are fit for use.</p> <p>6. We believe further work is required on the CoS process to build incorporate these changes. We question whether these changes are sufficient to allow metering and configuration information to be sent effectively between parties especially with the need to take into account the Objection Window and EU 3rd Package requirements. We also feel the proposed CoS reading process is too complex and may face difficulties in operating effectively, and potentially a further change will be required to build on the foundations that this CP sets. We believe that the old supplier must be responsible for getting their own read as the new supplier may not be able to deal with the old meter configurations. We feel that the security requirements will not allow a new supplier to take a read on behalf of the old</p>

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			<p>supplier.</p> <p>7. We do not believe that the red lining of the BSCPs have been fully reviewed and contain inconsistencies with the agreed principles of this change. We believe the following comments require clarification: [ELEXON: Comments added to redlined comments section]</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: Supplier, NHHMOA, NHHDC</p> <p>MOP, NHHDC and Supplier systems will require changes to be made, although full impacts are not yet known, these are likely to be significant and will require sufficient lead time to make these changes.</p> <p>We will also need to make changes to internal business processes in order to manage the requirements of these changes, which will require staff training.</p> <p><u>Comments relating to implementation date</u></p> <p>Due to the significance complexity of these changes we do not believe we would be able to support an implementation date earlier than June 2014 due to both development timescales and the significant testing that will be required. We also believe that any implementation dates needs to take into consideration the changes being delivered for registrations in November 2013 which will also be highly resource intensive.</p> <p><u>Comments relating to implementation costs</u></p> <p>A full impact has not yet been established as to the cost of change, however these are likely to be significant.</p>
Electricity North	Yes	Yes	<u>Comments relating to agreement of the solution</u>

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West Limited			<p>Electricity North West agree with the regarding Meter Technical Details for Smart Meters as;</p> <ul style="list-style-type: none"> • Suppliers will be responsible for distributing the data to LDSO's so we would expect any inconsistencies between Meter Asset and Configuration data should have already been identified. • The two new dataflows split Asset data and Configuration data and differentiate Dumb and Smart Meters. • LDSO's receive other Smart Devices information so we understand what is on site. <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: LDSO</p> <p>The impact on Electricity North West is;</p> <ul style="list-style-type: none"> • Need to understand Smart v Legacy • New processes required as Supplier now responsible for sending new dataflows • System Functionality and validation Changes • Receipt of new dataflows <p>Consideration has also been given to the following outstanding issues that impact Smart Meters;</p> <ul style="list-style-type: none"> • Charging Methodology for billing Smart Meters HH • De-linking the Settlements process • Will new Measurement Classes be introduced to support aggregated HH data? <p>Until these new dataflows and processes are implemented there is still the issue of how we currently address the installation of Smart Meters during the Foundation Stage. From the 28th February when</p>

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			<p>DTC CP 3349 – ‘Changes to Meter Types to account for Smart Meters’ is implemented, Suppliers will be able to populate the current Meter Technical Details with the Smart Meter Type, but this does not account for Smart Meters that have already been installed. (Currently being discussed at IREG) Also if the Smart Meter has been configured down to function as a Dumb Meter will the Supplier input this as a Meter Type of Smart or Dumb? In our opinion it is still a smart meter and as such should be recognised as such otherwise a new supplier may instigate a change of meter. The Measurement Class should be used to understand how it is being settled (HH v NHH) rather than the operation of the meter.</p> <p>Another consideration which should be taken into account is the timescale for CoS readings where a Smart Meter has been installed. As the meter can be remotely read then the Supplier should be able to provide this reading on the date on SSD or SSD+1.</p> <p><u>Comments relating to implementation date</u></p> <p>This is 365 days from approval of the CP and the relevant MRA change process approvals.</p> <p>This is due to the impacts above.</p> <p>Yes, due to the system functionality and business process changes required to implement this change delivery for June 2013 is not feasible.</p> <p><u>Comments relating to implementation costs</u></p> <p>We estimate the costs of these changes to be between £300-500K.</p>
E.ON UK	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>-</p> <p><u>Comments relating to impact of the solution</u></p>

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			<p>Impacted as: Supplier, NHH MOP</p> <p>Impact is on a variety of internal and external systems and processes.</p> <p><u>Comments relating to implementation date</u></p> <p>-</p> <p><u>Comments relating to implementation costs</u></p> <p>Not assessed at this time.</p>
Lowri Beck Services Ltd	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>Lowri Beck supports the proposed changes and believes that smart metering is unable to follow existing processes.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: NHHMOA, NHHDC</p> <p>Change to existing processes and systems to implement the change. Lowri Beck however supports the change to industry processes and systems.</p> <p><u>Comments relating to implementation date</u></p> <p>6 months notice would be required to allow for industry software providers and internal system/process changes to be made.</p> <p>The proposed release would not have a negative impact on our organisation, Lowri Beck understands and supports the requirements for changes to be made as part of smart metering.</p> <p><u>Comments relating to implementation costs</u></p> <p>Unable to provide, however business analysts and IT resources will be required to implement the</p>

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			changes. This will be at a cost for Lowri Beck.
Northern Powergrid	Yes	Yes	<p><u>Comments relating to agreement of the solution</u> We would be able to identify smart meters and other smart equipment at a site as well as the configuration details.</p> <p><u>Comments relating to impact of the solution</u> Impacted as: LDSO Configuration to receive the new data flows as well as introducing any new processes.</p> <p><u>Comments relating to implementation date</u> Q4, 2013 implementation</p> <p><u>Comments relating to implementation costs</u> Costs - Not known at this stage Based upon previous changes to receive data flows the indicative cost is estimated to be low.</p>
Npower	Yes, with caveats	Yes	<p><u>Comments relating to agreement of the solution</u> We support the intention of the change and understand the need for some of the proposed changes to support industry testing and mass rollout. However, given the volume and nature of the comments raised below and also that the proposed changes will not encompass the end to end processes, e.g. change of measurement class, there is a concern regarding the risk / benefits of making these changes in isolation.</p> <p>We would like clarity on the points we have raised within our response so we can take confidence in the roadmap towards an enduring solution whilst maintaining the integrity of Settlement during the</p>

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			<p>transition towards mass rollout and beyond. We feel that the making the proposed changes in isolation will leave some processes within the BSCP(s) un-usable.</p> <p>We would also like a clear understanding of the contentious items of this CP so we have a view of areas of the proposal that have a high risk of further change so that we can plan our own changes accordingly.</p> <p>General Comments:</p> <ol style="list-style-type: none"> The changes proposed in CP1388 will also require BSC Modifications to be raised to make the necessary changes to the BSC. We believe these Modifications will need to be approved by the Regulator before this CP can be approved by the SVG so not to place parties in a situation where they cannot be compliant with both the BSC and BSCPs. We do not agree with the name of the proposed new flow and feel they should be named as below: <ul style="list-style-type: none"> Smart Asset Details Smart Meter Configuration Details <p>The 'Smart Device Details' should be called 'Smart Asset Details' as the flow relates to 'all' items that make up a Smart 'system' including a specific group called "other Smart devices" in addition to the meter details group, hence it should be more generic and refer to 'assets'.</p> <p>The flow called 'Meter Configuration Details' should be called Smart Meter Configuration Details; to at least refer to the fact it's about Smart meters and not just a meter. The flow description captures this and therefore it should be included in the name.</p> There are benefits to utilising the new flows for ADMs. However, it is too complex to mandate use of flows for all ADMs and too risky to apply retrospectively based on

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			<p>experience from AMR. Therefore we suggest that the BSCP scope is extended to mandate the use of the new flows only where ADMs (meter type NSS) installed on / after the implementation date of this change. In addition, all SMETS meters (type S1, S2, S2A, S2B) should use new flows,</p> <p>4. 'The MOA will provide the Smart Device Details to the Supplier when a Smart Meter is installed, replaced or removed or when any changes are made to the Smart Device Details.'</p> <p>We can foresee certain scenarios where changes are made to Smart Device Details which are outside the knowledge and control of the MOA after the initial installation so it seems unreasonable to expect the MOA to always provide updates. If a Supplier adds a new device to the HAN, e.g. an advanced IHD, then the Supplier would need to update the MOA with details of the changes to allow them to send an update flow to all relevant parties and party agents but the BSCP does not detail a process for this.</p> <p>5. 'Whenever there is a change to the Smart Device Details, the Supplier will forward the Smart Device Details to the LDSO (and optionally to the Non Half Hourly (NHH) DC).'</p> <p>We would like a definitive list of scenarios where the transfer of flows is mandated so it is clear in all instances and would protect the integrity of Settlements. The optional nature of sending data flows will add further complexity and cost to already complex system and process. Without the list of scenarios we would advocate that the whole Supplier Hub should be updated and can choose to use the information or not (for example, the way NHHDCs currently process D0149/D0150 where no data items have changed).</p> <p>We also feel that further consideration should be given to shifting responsibility for updating Supplier Hub with the Smart Device Details flow from MOA to Supplier. As the MOA are owners of the Smart Device Details it would be more efficient and less change for them to</p>

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			<p>continue to distribute and they would be better placed to address any queries arising, e.g from the LDSO. However, this should be considered alongside the comments made in point 3 above.</p> <p>6. 'Whenever there is a change to the Meter Configuration Details, the Supplier will forward the Meter Configuration Details to the NHHDC and LDSO (and optionally to the MOA).'</p> <p>We feel that the optional nature of sending data flows will add complication and cost to already complex system and process changes and would advocate that the whole Supplier Hub should be updated and can choose whether to use the information or not. If the MOA needs to attend an emergency site visit (where the Supplier does not request the appointment), then the MOA will require the Meter Configuration Details to map end readings to the correct Meter Register IDs. Incorrect mapping will result in errors in Settlements and billing. In addition, the MOA will require Meter Configuration Details to undertake tasks such as fault investigations and it would be easiest if these were always available, rather than on request. We also note that there is no mechanism prescribed if the flow is to be optional for the MOA to request the details should they be required.</p> <p>7. 'The scope of this Change Proposal excludes the change of Measurement Class processes. This is because further consideration is needed in the wider context of potential changes to the Metering Codes of Practice and the use of elective HH metering. These processes are likely to be subject to a subsequent Change Proposal'.</p> <p>We feel that the exclusion of the CoMC process creates a BSCP that will prevent CoMCs between Smart and HH. We understand that this will be addressed by subsequent changes but feel that in the interim there is a risk without having a defined CoMC process for Smart to HH.</p>

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			<p>8. Usage of the D0052 – We feel that this CP has only reviewed the usage of the D0149 and D0150 flows. We feel it must also review the D0052 process for Smart meters as it is often the processing of these three flows together that is an integral part of the processes that are being changed by this CP. The D0052 process still causes problems in industry processes, Settlements and billing. We should use this opportunity to improve and simplify industry processes and this change should be the catalyst for incorporating a review of the D0052 processes along side this Smart Meter Technical Details proposal. Could additional data items be included in the Meter Configuration Details flow that would make the D0052 redundant for Smart?</p> <p>9. Simplicity of process – With the advent of Smart Metering the industry has the opportunity to simplify some of the complex Settlements processes that are part of the obligation we perform today. There are elements of this CP that do not take this ethos into account, specifically relating to the optionality of flows and the suggestion that Supplier will be able to make more than one Settlement effecting change in a single day. Whilst we understand that a large amount of change is needed for the Industry to be able to support Smart Metering we feel that this CP is lacking in some areas of change (see usage of D0052 flow point), but in other areas has shoe horned in further complex change (such as a new CoS process). We would like to see further supporting information specifically relating to the new proposed CoS process, we feel it is more complex than the process today and feel a supporting timeline or process map should be produced by the industry to enable the participants to understand this new process in detail before we can agree to the change with confidence.</p> <p>10. Optionality of flows – We need consistency in the industry, especially with the advent of Smart. We would like a definitive list of scenarios where the transfer of flows is mandated</p>

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			<p>so it is clear in all instances and would protect the integrity of Settlements. The optional nature of sending data flows will add further complexity and cost to already complex system and process. Without the list of scenarios we would advocate that the whole Supplier Hub should be updated and can choose to use the information or not.</p> <p>11. Initial and Final Reads from Supplier - General comment regards remote meter readings from Supplier. Currently a Data Retriever / MOA allocate a Reading Type (Data Item J0171) when manually obtaining a read from site. As the remote meter reading will come from the Comms Agent / DCC (the Smart Meter System Operator - SMSO), is it expected that the SMSO will set the appropriate Reading Type (Data Item J0171) against the reading or will it be the Suppliers responsibility to ensure that the correct read type is set against the reading (particularly for the scenarios where the read is needing to be a Final or Initial but also for Actual / Routine)? Where meter readings have been taken remotely via the DCC or Comms Agent, what read types will be used?</p> <p>12. The proposed changes move obligations away from BSC Agents and onto Suppliers. Currently, the BSC Agent(s) are heavily audited against the processes within the BSCP(s). If these changes go-live that will increase the work for the BSC Auditor as they will need to continue auditing BSC Agents in the same way for Traditional metered sites and then increase their scope on the Supplier Audits for those sites with Smart meters installed. Any proposed Smart change must not place un-necessary risks on the integrity of Settlements and would hope to that the Performance Assurance Framework can be altered and strengthened during the transition period whilst ELEXON operate processes for both Smart and Traditional sites – maintaining the integrity of Settlements.</p> <p>13. The changes proposed in CP1388 will make significant changes to BSC Agent and Supplier systems. We feel when assessing, BSC Agents may deem these changes as being</p>

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			<p>significant, thus triggering a re-qualification. This could be mitigated by carrying out industry testing. The same approach should be taken for Suppliers who at present do not need to re-qualify – we would also expect this to change as more responsibility for Settlement effecting processes moves to the Supplier. Again, work will be needed on the Performance Assurance Framework to provide the industry with confidence that Settlements remain as well protected as they are today.</p> <p>14. Will there be prioritisation on multiple readings received by the Supplier on the same date across different sources, e.g. MOA provided read and remote read via comms agent and customer own read all received on same day – which of these should be passed to NHHDC for Settlement validation?</p> <p>15. The Smart Equipment Work Management request dataflow has SSC, MSNSFC and Requested Energisation Status at Meter level rather than MPAN level. Why? Can these items differ across meters on the same MPAN? This has a very significant impact on existing functionality.</p> <p>16. Clarification on the relationship of the SSC – is this 1:1 to the MPAN, or could there be multiple SSCs to an MPAN?</p> <p>17. More definition is required for exception management surrounding Change of Agent details (involving new SMART agents) where there is missing MTD history.</p> <p>18. Clarification within CP1388 key points that Supplier will notify energisation status. Current draft indicates MOA to communicate this detail.</p> <p>19. Clarity is required within BSCP504 for Energisation / De-Energisation sections for energisation status on the Meter Configuration Details flow. Also, more clarity is required around the meter disabling process and how other market participants would be notified.</p>

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			<p>(For example - the impacted parties include the Data Collector via D0095s).</p> <p>Comments on the numbered key features of the proposed solution (pages 2-3):</p> <p>Point 1. Should read "MOAs will not be mandated". However, we anticipate that Suppliers may make it mandatory in certain scenarios, e.g. to demonstrate compliance with LC12 safety visit obligations.</p> <p>Point 4. We believe the NHHDC will need to know certain information contained in the Smart Device Details Flow, e.g. meter location when there is a requirement to perform a pedestrian meter reading and also to validate the information contained in the Meter Configuration Details flow to protect Settlements.</p> <p>Point 5. The Supplier is not in control of the energisation status of the meter, it is the MOA that has ownership and control over this status and there are D0139 processes that work today to ensure the Supplier, NHHDC and LDSO are updated accordingly. The Supplier will be in control of the enable / disable process, is this the point that is being made here? If so NHHDC need to know whether they should process a zero advance meter reading (or whether there is an error) and BSCP504 contains no processes that mandate the use of this data item (which is also not part of the MRA data set of J items). Please clarify the point this bullet is making. As it stands we would expect Supplier to be mirroring the current expected Energisation Status in these flows. If there is a change then we would agree that the D0139 is the correct method for that update to be passed between participants. Is this a correct assumption to make?</p> <p>Point 6. We feel that the 10 Working Days should consist of a timed obligation on the MOA to provide the Smart Device Details and then the Supplier should have 5 Working Days to complete the process. If a process is to be made up of 2 steps then each element requires a measurable timescale. However, please note our earlier comments regarding distribution of Smart Device Details</p>

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			<p>flow.</p> <p>Point 7. Should say "change of MOA and / or NHHDC". We do not agree with the use of "other means, as agreed" in this process. This does not necessarily mean that the Contract Reference within the D0155 is the best method for achieving notification of a Smart Meter and we feel that the addition of a Smart flag in the D0155 would be a neater solution. If the Contract Reference is used to indicate Smart Metering then the flow notes and / or Annex C of the DTC should describe what Contact Reference to use. This will ensure consistency across all MOAs and Suppliers. In addition, we think that Contract Reference should be updated as part of the Smart deployment process. This will aid the MOA in selecting the correct processes for Smart metering.</p> <p>Point 10. Can you clarify that the enablement status for the meter will be available to the MOA via the DCC? There may be instances where MOAs will need to visit site and will require information on existing metering status which have not been triggered by the Supplier, e.g. emergency work. It appears that Point 10 contradicts Point 5. In terms of the energisation / de-energisation process we would like clarity as to whether the Supplier is expected to provide updated 'Meter Configuration Details' in response to receiving a D0139 from MOA or potentially LDSO.</p> <p>Point 12. Should be reworded to state "the Supplier will ensure that the latest version for that day is the one that is distributed to the NHHDC". To "endeavour" means they will do their best which we feel is no appropriate when this will be a compliance obligation. Whilst it is understood that the configuration of the meter may change more than once in a given day current NHH Settlements processes cannot support more than one Settlement effecting change in one day. Therefore there should be a limitation set that only one Settlement effecting change can be processed per day. A defined list of scenarios where multiple SSC changes could occur in a single day but not necessarily impact on Settlements should be produced.</p> <p>Point 13. We believe this will lead to confusion – the flow description in the DTC suggests the use of</p>

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			<p>the Smart Equipment Work Management Request is limited to work carried out on the 'meter', whereas the point above suggests this flow is used for the installation / maintenance of additional 'Smart Metering Equipment'. We understand the latter to be correct and would like this made clearer in the DTC Flow Description. Words to the effect of "Request is being made and information provided to allow removal, replacement or installation of a meter and or associated Smart Devices. Used for meters other than Smart meters, for which the D**** Smart Equipment Work Management Request flow should be used."</p> <p>Point 14. We strongly disagree with the stance adopted for only designing for success. It seems short sighted to consider making such wide scale changes to the provision of MTDs yet to not prescribe a method of chasing missing flows. This could pose a serious risk to Settlements which needs to be mitigated in line with the existing Performance Assurance Framework. "Designed for success processes" provide no protection to Settlements where exceptions arise.</p> <p>Point 15. How will this MDD item be managed? As no governance is in place to approve a meter model / version combination as SMETS compliant this item may become subjective based on individual participants view on whether a meter is SMETS compliant. For instance a MOA may be working for two different Suppliers with different views on a meters compliance with SMETS. This could be down to something as simple as Supplier A has completed firmware testing and so is happy to accept a meter when Supplier B has not. We would expect a similar framework to BSCP601 to be implemented to manage this process.</p> <p>Point 16. Changes will be required to the PARMS serials and it would have been beneficial for these changes to have been made in tandem with this CP. We are concerned that if the inevitable PARMS CP is not raised in a timely manner then there will not be the same level of assurance across Traditional and Smart meters to protect Settlements.</p>

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			<p>Comments on the justification section (pages 3-4):</p> <ul style="list-style-type: none"> We disagree with the justification for the new flows always being sent from the Supplier to the NHHDC. It is not currently an issue for NHHDC to have processes to chase the Supplier and MOA for separate flows. However, we understand the proposal would streamline the process. <p>We would like a clear understanding of the contentious items of this CP so we have a view of areas of the proposal that have a high risk of further change so that we can plan our own changes accordingly.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: Supplier, NHHDC and MOA.</p> <p>CP1388 represents a significant change to the existing procedures which would require significant systems changes, made more complex by the need to be able to operate existing traditional processes alongside new Smart processes. This is compounded by uncertainty surrounding the level of additional change required to reach end to end design, against which business processes and systems can be developed (for example we anticipate significant changes to PARMs reporting as a result of CP1388 which will need to be addressed).</p> <p><u>Comments relating to implementation date</u></p> <p>Npower would require a minimum of 12 months from committee decision. We could support a June delivery subject to issues / clarifications being addressed satisfactorily. However, we would be more confident of accommodating the impact of this CP if the implementation date was set to Nov 2014 and / or aligned to the DCC go-live.</p> <p>There are significant challenges with implementing these changes across our systems and processes</p>

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			<p>to meet the target date of June 2014, made all the more difficult due to the volume of comments and uncertainty of other changes. A target date of November 2014 would be more achievable and improve likelihood of an integral end to end solution. However, we do recognise that importance of these changes in supporting industry testing and mass rollout.</p> <p><u>Comments relating to implementation costs</u></p> <p>It is difficult to provide meaningful estimates at this stage given the level of uncertainty with the current drafting combined with the commercial arrangement with IT Suppliers and in-flight Smart projects. However, initial high-level assessment of this proposal indicates there will be significant change across a number of our systems and processes to allow for both Smart and Traditional processes to run in parallel.</p>
ScottishPower	No	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>Whilst supportive of the initiative that gave rise to this change, we disagree with certain key aspects of the change itself, where we believe the opportunity exists to explore more forward looking arrangements that are less dependent on the routine exchange of technical data between Party Agents.</p> <p>In common with many other Suppliers in the midst of major system change programmes (that will, ultimately, encompass much of their functional response to the SMIP), the system architecture/requirements that we will implement in preparation for DCC Go Live are still in the process of being defined. Our assessment, therefore, cannot be shaped as much by the implications for our baseline systems and processes as they are predicated on our expectations of the smarter market.</p> <p>In line with our previous response to the October 2012 consultation on this matter, we do not think</p>

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			<p>this change satisfies the ideals of the smarter market for the following reasons:</p> <ul style="list-style-type: none"> • Whilst we consider it essential that the MOA provides asset details upon job completion (i.e. installation, exchange or removal), we do not think they should retain responsibility for maintaining smart asset details. Instead, the responsibility for maintaining and distributing smart asset details on an enduring basis should lie with the Supplier. Nonetheless, the Supplier may choose to discharge such obligation via contractual arrangements with an agent. • The DCC has an important role to play in terms of making available asset and configuration data. It is essential that the scope and content of the DCC inventory and the associated services are defined such that they allow for the simplification of industry processes, minimising the exchange of data between organisations. The data and services made available by the DCC will have a significant bearing on the requirements for data exchange on Change of Supply. Our preference is for as much asset data to be held centrally as is possible. • Although the industry codes make specific provisions to facilitate change where it impacts on more than one of them, experience has shown that navigating a change through multiple channels in this way has proven very challenging. In the case of smart metering, however, it is likely that such difficulties will be further exacerbated by the potential for cross-industry/cross-code changes. We, therefore, believe a holistic approach should be taken to any code changes relating to smart metering and that, in particular, the possibility of developing smart specific processes as subsidiary documents of the Smart Energy Code (SEC) should be very seriously considered. <p><u>Comments relating to impact of the solution</u></p>

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Organisation	Agree?	Impacted?	Comments
			<p>Impacted as: Supplier, MOA and NHHDC</p> <p>The full impacts of this change will only become clear as we complete the requirements gathering phase of our existing, major system change, programme; requirements that, in themselves, have a dependency on the outcome of many of the current SMIP work streams.</p> <p><u>Comments relating to implementation date</u></p> <p>Although we recognise this is normal practice, we do not consider this question to be relevant to this change, where success is based on meeting a predetermined implementation timetable. (See our response to Q.4)</p> <p>If this is the Feb 2014 / June 2014 timeframe, which was not clear from the change circular, then the release would fit broadly with the planned implementation of our smart system architecture.</p> <p><u>Comments relating to implementation costs</u></p> <p>As with our response to Q.3, we do not consider this question to be particularly relevant in the circumstances.</p> <p>Nevertheless, the work is being considered within the scope of our wider programme requirements, where it would not necessarily be regarded in isolation. For us to consider and provide specific costs related to the aspects contemplated in this change, therefore, would require considerably more time and resources than are immediately available for the purpose.</p>
Siemens	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>In general we support this CP, but the issues mentioned below are of some concern, especially the Change of MOA flow as they are not optional.</p> <p>The CP states that MOAs will not be required to provide any readings taken on site to the Supplier,</p>

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			<p>unless required by the Supplier as a contingency or as evidence of a site visit.</p> <p>It would seem a sensible for the MOA to always take a reading from the meter registers when on site. An actual register reading can be invaluable when carrying out query resolution work and provides reference point(s) in such work. This requires the MOA to have information on the configuration.</p> <p><u>Comments on DTC CP Annex B Redlined</u></p> <p>Siemens MCS strongly support the enhancement of asset details in the Smart Device Details flow to include 'other smart devices' and refusal of meter or IHD.</p> <p>We also support the Test Date and Next Test Sample Date (although this would be better re-ordered to Next Sample test date).</p> <p>The former is the initial test date for an asset and is the starting point for testing of an asset. The latter helps identify that a meter is part of a population that needs testing at the date in this field. If the outcome of sample testing is not favourable then it identifies meters in a population that will need removing from service as the date is superseded. These meters may be being operated by different MOAs.</p> <p>As the test outcome of a sample can be applied to other parts of the population, this data item provides a mechanism of tracking the next test date requirement for all of the assets concerned.</p> <p>It is better to hold key asset information such as this against an asset rather than try to control the testing process by reporting processes.</p> <p><u>Comments relating to impact of the solution</u></p>

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			<p>Impacted as an NHHMOA, NHHDC.</p> <p>Significant system software changes would be required to accommodate the introduction of the new Smart Device Details, Meter Configuration Details and Smart Equipment Work management Request flows.</p> <p>Operational processes would also need to be created and implemented to cover the responsibilities for the data and handling of the new flows.</p> <p><u>Comments relating to implementation date</u></p> <p>Due to the significant system changes (including analysis, design, development & testing) required for introducing new data flows, we would need at least 18 months to schedule and carry out this activity.</p> <p>Preferred release would be June 2014</p> <p><u>Comments relating to implementation costs</u></p> <p>Unable to provide costs at this time.</p>
SSE Energy Supply	No	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>We are fully supporting of the principle of being able to issue Meter Technical Details that clearly identifies Smart Metering and is issued to the appropriate parties in a timely manner when metering changes take place. However, we disagree with the need to introduce a Smart specific dataflow to request changes to Smart Metering of the MOA.</p> <p>We would also seek further clarification and discussion on a number of points that have been raised in our response to this Impact Assessment. In part this is a result of the changes to the proposed solution in the earlier Consultation, to what is presented in the IA. We believe that further work is</p>

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Organisation	Agree?	Impacted?	Comments
			<p>required by the joint BSC-MRA working group before a firmer consensus can be achieved that balances an efficient and effective solution. We would welcome this working group being reconvened as soon as possible to work through the solution.</p> <p>We have further comments on the key features of the proposed solution identified in CP1388. We have provided information on these relating to each key feature identifier:</p> <p>Key feature 1 - We believe that the taking of a final/install meter reading should continue to be mandated as an obligation on the MOA. This can be re-visited and assessed under a separate CP once the DCC processes and services are established.</p> <p>Key feature 2 – We disagree with the proposal to use the Smart flows for removal of legacy metering. The D0150 dataflow should continue to be sent by MOA to notify the removal of the legacy Meter to relevant parties.</p> <p>Key feature 3 – Agree. The MOA would need to decide whether this flow would require processing.</p> <p>Key feature 4 – We query whether the Supplier should be sending the Smart Device Details as an optional dataflow to the NHHDC. The NHHDC would require the Meter Location, held on Smart Device Details to facilitate ease of obtaining site visit reads.</p> <p>Key feature 5, 6, 7, 8, 9, 10, 12 & 15 - Agree</p> <p>Key feature 11 – We disagree with this statement. The MOA should be obliged to issue the Meter Configuration Details flow to the Supplier when the meter is locally configured. There may be ongoing reasons that comms to the meter is unavailable and without this information, the Supplier will have not received the necessary confirmation of what is physically configured on the meter.</p> <p>Key feature 13 – We disagree with the introduction of the new dataflow 'Smart Equipment Work Management Request'. Suppliers can continue to use the D0142 or make own arrangements with</p>

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			<p>their Meter Operator as per the Bilaterals already currently in place.</p> <p>In the event of a new flow being introduced, the Comms/IHD datagroups do not need to be mandated and these need to be Optional.</p> <p>Key feature 14 – This CP and its impact assessment, should handle the unsuccessful instances also as part of its scope. The scenario for missing flows needs to be added to the relevant BSCP as well as incorporating the necessary DTC changes.</p> <p>Key feature 16 – We believe that further changes to PARMS Serials should be pended until the Smart changes are complete. This would allow the recent changes Serials to bed in and ensure that the changes required were efficiently and effectively identified to minimise unnecessary change.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: Supplier, NHHDC & MOA.</p> <ul style="list-style-type: none"> • Supplier – Ability to create and receive new Smart Meter Technical Details. Changes required to Processes, Systems and Training to handle these flows. • NHHDC – Ability to receive appointments and handle new Smart Meter Technical Details. Proposed changes to source and timing of data. Changes required to Processes, Systems and Training. • MOA – Ability to handle 2 parallel processes for issuing all or part of Meter Technical Details dependent on whether metering is Smart and the scenario. Changes required to Processes, Systems and Training. <p><u>Comments relating to implementation date</u></p> <p>Of the 2 proposed implementation dates in the CP documents we would require an implementation</p>

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			<p>date of June 2014.</p> <p>In the event of an earlier date being selected for implementation than June 2014, this would introduce a greater risk to successfully being able to implement other mandated changes from Industry. In the same timescales, we will be making changes to our systems and processes to support:</p> <p>Consequential changes – Registration</p> <p>Accession to the SEC – introduction of DCC Services and preparing for Industry Testing</p> <p><u>Comments relating to implementation costs</u></p> <p>As referred to in earlier questions, SSE would incur significant costs to complete the System changes, Business Process changes and Training.</p>
SSEPD	Neutral	No	<p><u>Comments relating to agreement of the solution</u></p> <p>No interest</p> <p><u>Comments relating to impact of the solution</u></p> <p>-</p> <p><u>Comments relating to implementation date</u></p> <p>-</p> <p><u>Comments relating to implementation costs</u></p> <p>-</p>
TMA	No	Yes	<u>Comments relating to agreement of the solution</u>

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			<p>The change as it stands is not acceptable.</p> <p>There is no need to use historical data with Smart Meters; the D0052 contains an EAC that can be used until an AA and EAC are calculated based on the second Smart Meter read. The introduction of Smart Meters is an opportunity to free the processes from legacy data quality and process breakdown issues. The transfer of historical data is problematic in its efficiency and accuracy and therefore need to be removed from Smart Meter processes.</p> <p>From red line changes to BSCP504 3.3.7 and CP1388 form, key feature number 2, the Supplier will send the SMART flow DYYYY with the details of the non-SMART removed meter(s). The NHHDC will have to accept SMART specific flows for non-SMART meters.</p> <p>It would make more sense for the MOA to handle the non-SMART meter process until the end i.e. the removal of the meter and the Supplier to handle the SMART meter process only.</p> <p><u>Comments relating to impact of the solution</u></p> <p>Impacted as: NHHDC</p> <p>System and procedures.</p> <p><u>Comments relating to implementation date</u></p> <p>-</p> <p><u>Comments relating to implementation costs</u></p> <p>High cost.</p>
Western Power Distribution	Yes	Yes	<p><u>Comments relating to agreement of the solution</u></p> <p>Acceptance subject to issues with red-lining listed below being rectified to our satisfaction.</p>

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			<p><u>Comments relating to impact of the solution</u></p> <p>Impact as: LDSO, MOA.</p> <p>System and business process changes to comply with new requirements and to process new flows.</p> <p><u>Comments relating to implementation date</u></p> <p>A lead time of at least 12 months will be required to deliver these significant changes so a February 2014 implementation will be challenging. June 2014 would be preferred.</p> <p>February 2014 implementation will be challenging. June 2014 would be preferred.</p> <p><u>Comments relating to implementation costs</u></p> <p>Initial view is that changes will cost in the region of £25,000.</p>

Comments on the redline text CP1388

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No.	Organisation	Document name	Location	Severity Code	Comments
	EDF Energy	BSCP504			If the meter details in Smart are not sent to the NHHDC how will they know if/when a meter is removed. Is this important to the DC or will they treat this as De-energised and record no consumption.
	EDF Energy	BSCP504			If the DC is de-appointed or there is a CoS and subsequently the meter configuration changes, then we do not believe the passing of historic information would seem sensible e.g. the EAC details.
	EDF Energy	BSCP504	3.2		The New Connection process does not really cover the meter installation, we believe they should be two separate processes.
	EDF Energy	BSCP504			Change of DC outside of CoS – What would happen if no meter is on the MPAN, would we send the appointment request as we currently do or the “Smart” version, and which MTDs would be used.
	EDF Energy	BSCP504	3.2.3.8		The Supplier is unable to send the D0152.
	EDF Energy	BSCP504	3.2.4.3		This is MOP to Supplier so not required for this BSCP.
	EDF Energy	BSCP504	3.2.4.4		If the DC or the meter is unchanged why would the NHHDC require the details again?
	EDF Energy	BSCP504	3.2.7		We do not believe the timings in process are workable as all of the agent appointments and MTD details need to be completed prior to SSD.
	EDF Energy	BSCP504	3.2.7.3		We believe this is too late in the process and would need to be completed by SSD -2wds.
	EDF Energy	BSCP504	3.2.7.4/5		The old supplier should take their own final readings as the new supplier may have changed the MTD configuration.

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	EDF Energy	BSCP504	3.2.7.8/9		We question why this is relevant to BSCP504.
	EDF Energy	BSCP504	3.2.7.10/1 1		This may not be relevant as the meter configuration may have changed.
	EDF Energy	BSCP504	3.2.7.12		We are not sure if ETs should be added as we believe these are outside of the vires of this change.
	EDF Energy	BSCP504	3.2.7.13/1 4		This would not be the NHHDC and would be too late in the process. Would the MOA best placed as if no read from the meter this may indicate that there is a Comms failure. If the read is valid, why would there be no D0086 sent?
	EDF Energy	BSCP504			Should the install/remove meter process be included in the BSCP as distinct section.
	EDF Energy	BSCP504	3.3.8.2.2		Is the D0002 to NHHDC required for a Smart Meter given that the Meter Config, readings and details are passed in the next two steps. So is the D0002 superfluous. If in 3.3.8.2.3 we send the new config details in all instances then this will mean a single process rather than one based on two sets of flows.
	EDF Energy	BSCP504			Does the Long Term Vacant process apply for Smart Meters, we are assuming this is not applicable as the supplier can take remote readings and then pass these through to NHHDC at period interval. These will then be true values for settlements. There currently isn't the "remote read" type with a D0010, which may require a change to be raised under the MRA.
	EDF Energy	BSCP504	3.3.10.4		This appears to be a duplicate of 3.3.10.1 and 3.3.10.3.
	EDF Energy	BSCP504	4.4		Need to amend CoS read to new/old DC processes.

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	EDF Energy	BSCP504	4.12.1		We would prefer if this section was split into Smart and Non-Smart as current details for the first two bullet points are overly complicated.
	npower	BSCP504	General		Where npower have made comments on specific steps which are repeated in other scenarios within the BSCP then these comments also apply to these scenarios.
	npower	BSCP504	3.2.1.3		Supplier should not be acting as a post box for the Dxxxx in this scenario. Dxxxx Smart Device Data is owned by MOA and should be distributed by MOA to Supplier, NHHDC and LDSO. As per our earlier general comments.
	npower	BSCP504	3.2.1.3		"the Supplier will endeavour to ensure that the latest version for that day is the one that is distributed to the NHHDC" should be reworded to state "the Supplier will ensure that the latest version for that day is the one that is distributed to the NHHDC". Additionally as the current NHH Settlements processes do not support more than one change of Settlement effecting data on the same day (for example changing SSC twice) can a limit on doing this be mandated. If the "I" and "F" read sent by the Supplier pass through the Supplier systems should they go through Supplier validation or should they be sent as un-validated? Is the Supplier always expected to send the "I" and "F" reads to the NHHDC even if it feels they are not valid?
	npower	BSCP504	3.2.1.4		The D0052 here seems redundant. Process detail should be reviewed and if necessary additional data items added to the Dxxxx and Dyyyy to cover the transfer of data. Alignment process still required if agreement is reached that Dxxxx still comes from the MOA.
	npower	BSCP504	3.2.1.4		Greatly improve, simplify or remove the D0052 process for Smart meters. There is no value in having the D0052 map with another automatically Supplier generated flow, unless manual intervention has occurred they will validate together giving this process no value.

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npower	BSCP504	3.2.1.8		Does the process still merit an option for NHHDC to reject one of these updates from Supplier? D0052 rejections are more valid if it is accepted that MOA will retain responsibility for the Dxxxx.
npower	BSCP504	3.2.1.11/1 2		Are there any anticipated changes to the NHHDC validation rules?
npower	BSCP504	3.2.3.1		We do not agree with the use of 'other means, as agreed' in this process. This does not necessarily mean that the Contract Reference within the D0155 is the best method for achieving notification of a Smart Meter and we feel that the addition of a Smart flag in the D0155 would be a neater solution. If the Contract Reference is used to indicate Smart Metering then the flow notes and / or Annex C of the DTC should describe what Contract Reference to use. This will ensure consistency across all MOAs and Suppliers. In addition we think that Contract Reference should be updated as part of the Smart deployment process. This will aid the MOA in selecting the correct processes for Smart metering.
npower	BSCP504	3.2.3.17		Supplier should not be acting as a post box for the Dxxxx in this scenario. Dxxxx Smart Device Data is owned by MOA and should be distributed by MOA to Supplier, NHHDC and LDSO. As per our earlier general comments.
npower	BSCP504	3.2.3 Additional		Where there is a Smart Meter installed a Supplier may also wish to retain the services of a Data Retriever. Therefore processes should not preclude the provision of a D0012 from NHHDC where the contractual arrangement between Supplier and NHHDC requires one.

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npower	BSCP504	3.2.4.3		<p>In this scenario where there are no Settlement impacting changes and the D0148 has been received into NHHDC would there be value in sending the Dxxxx?</p> <p>Supplier should not be acting as a post box for the Dxxxx in this scenario. Dxxxx Smart Device Data is owned by MOA and should be distributed by MOA to Supplier, NHHDC and LDSO. As per our earlier general comments.</p>
npower	BSCP504	3.2.7.1		<p>We do not agree with the use of 'other means, as agreed' in this process. This does not necessarily mean that the Contract Reference within the D0155 is the best method for achieving notification of a Smart Meter. We feel that the addition of a Smart flag in the D0155 would be a neater solution. If the Contract Reference is used to indicate Smart Metering then the flow notes and / or Annex C of the DTC should describe what Contract Reference to use. This will ensure consistency across all MOAs and Suppliers. In addition we think that Contract Reference should be updated as part of the Smart deployment process. This will aid the MOA in selecting the correct processes for Smart metering.</p>
npower	BSCP504	3.2.7.3		<p>This timeframe is too late, especially in the scenario where a re-configuration at SSD is required. Would prefer the trigger to be the same as the current NOSI (D0311) that should ensure transfer of technical details between Suppliers prior to SSD to allow for planning with DCC for updates to be applied as close as possible to SSD - need to overlay here the DCC process, and what we are required to do with the opening reading for Settlements.</p>
npower	BSCP504	3.2.7.3		<p>Again would prefer a transfer of the Dxxxx from old MOA to new, as per current Traditional process for D0150 and then this to be passed to Supplier and NHHDC. Config only on the Dyyyy would be required on the Supplier to Supplier route.</p>
npower	BSCP504	3.2.7.4		<p>Is this in line with a service that the DCC will offer?</p> <p>The "On SSD or as soon as possible" element is a concern with regards to Settlements impact.</p>

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	npower	BSCP504	3.2.7.5		There will be a significant amount of complexity involved in the Supplier system processing a D0010 for a reading that may be on a config that it has never seen (and will never bill on). How a reconfiguration on CoS is to be managed needs to be mapped out in more detail. How the "I" and "F" proposed reads fit in with the D0086 and also the config that a customer has been sold needs to be aligned.
	npower	BSCP504	3.2.7.5		Process requires that we sent the Dyyyy only to the LDSO where there has been a change. This would add complexity to the process.
	npower	BSCP504	3.2.7.6		Again we would prefer a transfer of the Dxxxx from old MOA to new, as per current Traditional process for D0150 and then this to be passed to Supplier and NHHDC. Config only on the Dyyyy would be required on the Supplier to Supplier route.
	npower	BSCP504	3.2.7.7		The D0052 here seems redundant. Process detail should be reviewed and if necessary additional Data Items added to the Dxxxx and Dyyyy to cover this transfer of data. Alignment process still required if agreement is reached that Dxxxx still comes from the MOA.
	npower	BSCP504	3.2.7		The change to the CoS process makes a process that is already complex today even more complex, it feels like this process has been shoe horned into this CP. We feel that a process map and / or timeline detailing the process and its interactions are needed for us to adequately understand the proposed change and therefore the impacts and subsequent requirements.
	npower	BSCP504	3.2.7		Is it envisaged that there will be changes to the Meter Reading types to reflect remote collection and to clearly distinguish between visual site reads?
	npower	BSCP504	3.2.7.8		We would prefer a transfer of the Dxxxx from old MOA to new, as per current Traditional process for D0150 and then this to be passed to Supplier and NHHDC. Config only on the Dyyyy would be required on the Supplier to Supplier route.

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npower	BSCP504	3.2.7.9		Shouldn't it be optional for the Meter Config Details to be sent to the old MOA in line with previous process changes?
npower	BSCP504	3.2.9		Why is there a need to change NHHDC as part of this process?
npower	BSCP504	3.2.9		Change of LDSO (for Smart Meters) this section still needs to account for where comms aren't available and therefore no remote meter reading can be obtained. The NHHDC may still have to deem a meter reading even though there is a Smart meter, therefore a new step needs adding for this and also ensure that timescales are included to say when an NHHDC needs to deem a reading (e.g. Change of LDSO date + 15 days).
npower	BSCP504	3.3.1/3.3.2		<p>Section 3.3.1/3.3.2 refers to the activity 'Coincident Change of Supplier and Measurement Class from a Non Half Hourly to Half Hourly Metering System'.</p> <p>How does this process work with Smart meters? Section 3.2.7 'Change of Supplier for Smart meters does not reference 'Coincident Change of Supplier and Measurement Class from a Non Half Hourly to Half Hourly Metering System'.</p> <p>Should section 3.3.1 make reference to the NHHDC receiving Smart Meter Technical Details (as there is reference for NHHDC to receive Non Smart Technical Details)?</p>

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	npower	BSCP504	3.3.3 3.3.4	<p>Within CP1388, point 5 within the section 'key features of the proposal' :</p> <p>"The Supplier will notify the energisation status of the Metering System on the Meter Configuration Details flow. The Meter Configuration Details will thus provide the NHHDC with the information needed to validate Readings from the Supplier."</p> <p>Consequently, should BSCP504 sections 3.3.3 (Energisation), and 3.3.4 (De-energisation) make reference to communication of energisation status details on the Meter Configuration Details flow?</p> <p>Also, does point 5 and point 10 within CP1388 slightly contradict itself?</p> <p>Within point 10 within the section 'key features of the proposal' :</p> <p>"The energisation / de-energisation processes will remain unchanged. The MOA will continue to send energisation status and associated readings to the Supplier, NHHDC and LDSO. Remotely disabled Meters are energised for Settlement purposes (and can still be read). It is not envisaged that Suppliers will need to notify other participants if a Meter is disabled as this information can be obtained from the Meter. It is expected that Suppliers will continue to take readings from remotely disabled Meters.</p>
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	npower	BSCP504	3.3.6.7		<p>How is an NHHDC supposed to implement this for where there is a Smart meter? It looks to suggest that if the Supplier cannot sort out the misalignment between the D0052 and the Dyyyy Meter Config details (both of which sent by Supplier) then the Supplier instructs the MOA to send the Meter Technical Details when the MOA won't even have the full set of Smart Meter Technical details.</p> <p>By what mechanism / flow should the Supplier request the MOA send the Meter Technical Details and then on receiving this flow / instruction how long does the MOA have to send the information to the NHHDC?</p> <p>Due to the above uncertainty, how does the NHHDC know what's going on and who's doing what, what should they be doing as all this goes on?</p>
	npower	BSCP504			<p>(Please note that this comment also made under BSCP514 review)</p> <p>BSCP514 page 79 6.3.3.11 covers the removal of a Smart meter and that the MOA sends the Dxxxx Smart Device Details flow to the Supplier. 6.3.3.12 covers for the Supplier sending the Dxxxx Smart Device Details to the LDSO. 6.3.3.13 is currently 'where Supplier has arranged' for the Supplier to send the Dxxxx Smart Device Details to the NHHDC. (please see earlier comments regards always ensuring the Supplier send this flow to NHHDC). If this is still optional and the Supplier has told the NHHDC they are not going to send this flow then in BSCP514 and BSCP504 we cannot see how the NHHDC get to know about the removal of a Smart meter.</p>

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npower	BSCP504	3.3.7		Reconfigure or Replace SVA Metering System – No Change of Measurement Class. We would recommend splitting this section as there are now two completely different processes for Smart meters. One for the replacement of a meter that would always need a site visit and introduce a new section just for the reconfiguring of a meter. This would help introduce clarity for all parties on each of these processes (for Smart and non Smart meters).
npower	BSCP504	3.3.7.2		This step suggests the Supplier will send the NHHDC a D0002 if it cannot obtain a remote meter reading. We can't see the point of this (and it could be confusing) as in steps 3.3.7.9 and 3.3.7.10 (for all meters) the NHHDC will deem the final and initial meter readings anyway; this would be a simpler process.
npower	BSCP504	3.3.7.2		States 'send Meter register reading for replacement MS / new configuration. This step needs to clearly state the Suppliers send the Final reading for the old configuration and the Initial reading for the new configuration (even though these will have been remotely obtained).
npower	BSCP504	3.3.7.3		For this step there must be an obligation if the meter has been replaced, otherwise how will NHHDC know about the removal of the old meter and the install of the new? We assume (although cannot tell as we do not have visibility of the new flow structures) that this detail would not be within the Dyyyy flow but within the Dxxxx asset flow.
npower	BSCP504	3.3.7.7		For this step why should NHHDC be chasing the MOA for missing "I" and "F" reads if in all other instances the MOA should be sending these reads directly to the Supplier and not the NHHDC? Surely it should be the Supplier therefore chasing MOA for the reads and NHHDC chasing the Supplier.
npower	BSCP504	3.3.8.2.3		'Send readings' needs to include 'Final and or Initial readings as appropriate'.

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	npower	BSCP504	3.3.10.3		States that the Supplier 'Send notification of change of Profile Class, including the initial EAC value, and a Meter reading(s) taken on the effective date of the Profile Class change.' Is this mandating a Supplier to take a remote meter reading on a change of Profile Class? If so then this needs to be clearly captured in the appropriate BSC documents. If it isn't mandated then remove the text captured in bold from the statement.
	npower	BSCP504	4.12.1; 2nd bullet point		Need to capture that the Supplier will send the appropriate readings (Final and Initial) to the NHHDC which match the configuration of the Smart meter.
	npower	BSCP504	4.20		typo in the new paragraph '... and the Meter Technical Details hshall instead.....'
	ScottishPower	BSCP504	3.3.10.3	M	The MTC may also change along with the Profile Class ID as a result of reconfiguration e.g. if 'time of day' kWh registers are being activated, or deactivated for the new configuration.
	ScottishPower	BSCP504	4.20, para 3	L	Spelling: "inditifies".
	SSE	BSCP504	3.2.1.3	M	Send Smart Device Details Supplier – LDSO should be removed from BSCP504 & only referenced in BSCP515. Otherwise there are the same obligations placed in multiple BSCPs, this leads to difficulty with future tracking of changes and ensuring drafting consistency.

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	SSE	BSCP504	3.2.3.17, 3.2.4.4, 3.2.7.6, 3.3.7.3.	M	In 3.2.1.3 drafting used is "Optionally send Smart Device Details". The terms should be consistent terms throughout for this Supp-NHHDC dataflow action.
	SSE	BSCP504	3.2.4.2	M	When does this action take place? No timescales added.
	SSE	BSCP504	3.2.4.3	M	Current MOA-Supp dataflow should be removed as no reference/requirement on NHHDC. Duplication of steps with BSCP514.
	SSE	BSCP504	3.2.7.3	M	Old Supplier should send New Supplier the Smart MTD by SSD.

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SSE	BSCP504	3.2.7.5	H	<p>We disagree with this proposed approach. Given the complexity of changes required to NHHDC processing, we believe the following approach can enable validation and settlement more efficiently:</p> <p>Where the Smart Meter configuration does not change at COS: New Supplier sends reading(s) to new NHHDC New Supplier sends Meter Configuration Details to new NHHDC</p> <p>Where the Smart Meter configuration changes at COS: New Supplier sends final reading(s) to old NHHDC Note: Old NHHDC still has old configuration and can complete Validation using history. New Supplier sends initial reading(s) for the new Smart config to new NHHDC New Supplier sends Meter Configuration Details to new NHHDC</p> <p>In addition, the following text should be added: The Supplier will endeavour to ensure that only the latest version of the configuration for the day is distributed to the NHHDC. New Meter Configuration Details from New Supplier to LDSO should be removed from BSCP504. Duplication of steps with BSCP515.</p>
SSE	BSCP504	3.2.7.6	M	Typo – From role should be New Supplier

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	SSE	BSCP504	3.2.7.8 & 3.2.7.9	M	New Supplier-New MOA dataflows should be removed as no reference/requirement on NHHDC for BSCP504. Duplication of steps with BSCP514.
	SSE	BSCP504	3.2.7.14	H	We propose this description is changed – this reflects our response in comment no.6 when a Smart configuration change is concurrent with a COS. Old NHHDC validates final reading(s) using historic data and old configuration. New NHHDC validates initial reading(s) for new configuration (where appropriate)
	SSE	BSCP504	3.3.7.3	M	If meter replaced, the Smart Device Details from Supplier to LDSO should be removed from BSCP504. Duplication of steps with BSCP515.
	SSE	BSCP504	3.3.8.2.2	M	Content relating to actions and dataflows sent from MOA to Supplier only should be removed from BSCP504. Duplication of steps with BSCP514.
	SSE	BSCP504	3.3.8.2.3	M	Send Smart Device Details from Supplier to LDSO should be removed from BSCP504. Duplication of steps with BSCP515.
	SSE	BSCP504	3.3.10.3	M	Clarification is sought on scenarios for Change of Profile class business process descriptions.

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	SSE	BSCP504	4.20 / Meter Technical Details	L	Typos with "identifies" – line 1 and "shall" – line 3 of redlined paragraph.
	SSE	BSCP504	General	L	We note that the footnote numbering and revisions appear to include changes from earlier revisions and confusing numbering. Is this a formatting issue with being a change marked document?
	TMA	BSCP504	4.20		<p>"Where the Meter Type identifies compliance with a version of the Smart Metering Equipment Technical Specification (SMETS), the Meter shall be considered smart and the Meter Technical Details shall instead be comprised of the Smart Device Details (Dxxxx) and Meter Configuration Details (Dyyyy) flows, without a requirement for the D0313"</p> <p>Should be:</p> <p>"Where the Meter Type identifies compliance with a version of the Smart Metering Equipment Technical Specification (SMETS), the Meter shall be considered smart and the Meter Technical Details shall instead be comprised of the Smart Device Details (Dxxxx) and Meter Configuration Details (Dyyyy) flows, without a requirement for the D0313"</p>
	EDF Energy	BSCP514	2.2.2(c)		We were of the understanding that the transfer was by the Supplier and not the MOA.
	EDF Energy	BSCP514	6.2.1.11		Is this step in the correct place, it would logically follow 6.2.1.13.
	EDF Energy	BSCP514	6.2.1.12		Why is this step required as the Supplier would have these details already.
	EDF Energy	BSCP514			New Connections – The meter install process should be a separate process. The New Connection should stop at section 6.2.2.6 this is because an installation process is required not just for new connections but for those which are now having a meter fitted after one was removed.

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	EDF Energy	BSCP514	6.2.2.17		How can the D0010 be issued to the Supplier if the MOA have not configured the meter? The Supplier would remotely configure the meter and therefore obtain the reading.
	EDF Energy	BSCP514	2.3.5/6		Are these steps required in BSCP514 as no MOA involved.
	EDF Energy	BSCP514	6.2.4.12 / 6.2.5.9		We believe this process is too late and would require this by SSD -5wds.
	EDF Energy	BSCP514	6.3.3.2		If rejecting the D0142 then we would prefer that a D0002 to be sent rather than the P0211. Also applicable to 6.3.4.2/9, 6.3.4.17 (D0zzz).
	EDF Energy	BSCP514	6.3.3.11 & 6.3.4.11		Where a meter is removed we would prefer the MOA not to have to take a final reading or this will slow the meter change process down.
	EDF Energy	BSCP514	6.3.3.12/1 3		Are these steps required as there is no MOA involvement also related to 6.3.4.21/22 and 6.4.1.16/17.
	EDF Energy	BSCP514	6.4.1.13		We are not sure that reads are required as we assume that the MOA will not contact the Supplier to read, so will the reads and configuration details be required by MOA.
	npower	BSCP514	General		<p>A housekeeping update may be required to Section X : X-1 General Glossary definition of "Meter Technical Details". As BSCP514 refers to a definition of Meter Technical Details, should BSC Section X be updated to reflect BSC514 (and also BSCP515). Current definition listed below:</p> <p>"Meter Technical Details"</p> <p>means all technical details (including Outstation channel mapping) of a Metering System required to enable metered data to be collected and correctly interpreted from that Metering System as referred to</p>

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					in BSCP20, BSCP502 or (as the case may be) BSCP504.
	npower	BSCP514	General		Lack of exception processes as built for success. We feel this is a concern and places and unnecessary risk to Settlements.
	npower	BSCP514	Page 8 -		Note that all Meter Register Readings shall have date and time in Co-ordinated Universal Time (UTC). Is this still applicable for Smart? Assume it is for Settlements but how are the meters configured? We can see a situation whereby customers are constantly phoning to say that their meter is displaying the wrong time. Does the IHD display UTC or does it move between GMT and BST?
	npower	BSCP514	Page 8/9		<p>- A MOA is required to:</p> <p>(bullet 3) maintain Meter Technical Details and to provide such Details, in accordance with Section L, to the relevant Half Hourly Data Collector or Non Half Hourly Data Collector (as the case may be) to enable such Data Collector to read and process data in accordance with the Supplier Volume Allocation Rules, in accordance with Party Service Line 100 and BSCP514 for Meter Operation and BSCP502 (in respect of Half Hourly Metering Systems) and BSCP504 (in respect of Non Half Hourly Metering Systems) (Section S2.3.1(b)).</p> <p>Is this statement still correct or should it be amended to include the Suppliers obligation towards MTDs for Smart?</p>
	npower	BSCP514	Page 13 - b)		On appointment to a SVA Metering System and irrespective of whether the preceding registration was in CMRS or SMRS, and where the same Meter is to be used, the incoming MOA shall request the transfer of data and other information, in accordance with Section 2.2.2 c), from the outgoing MOA to enable such incoming MOA to assume responsibility for the SVA Metering System.

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					This statement needs amending to include the amended Smart MTD process.
	npower	BSCP514	Page 14 - b)		<p>In the event of a Change of MOA in respect of an SVA Metering System, or where the SVA Metering System is being transferred from SMRS to CMRS, and where the same Meter is to be used, the outgoing MOA shall transfer the data and other information, as specified in Section 2.2.2c), in accordance with the timescales and processes specified in the relevant BSC Procedures, to the incoming MOA. This shall be done when requested by the incoming MOA and is not dependent on receipt of notification of de-appointment. The outgoing MOA shall cooperate with the incoming MOA, and any subsequent incoming MOA, to correct any errors relating to data associated with the outgoing MOA's period of appointment. In all cases the incoming MOA will retain an auditable record of any changes to the data.</p> <p>Where information has not been provided to the outgoing MOA then the incoming and outgoing MOA(s), along with the Supplier, shall work together to resolve the issue.</p> <p>This statement needs amending to include the amended Smart MTD process.</p>
	npower	BSCP514	Page 14, Bullet c)		"For Smart Meters, data to be transferred shall include Smart Device Details, For all other Meter types..." The second 'For' needs to be a lower case F as it follows a comma.
	npower	BSCP514	2.2.3 Bullet b)		Needs to also include '....and BSCP514' (existing omission).
	npower	BSCP514	2.3.2		Need clarity on specific scenarios. It is too general using terms like "where appropriate". Put in annex or explicit in steps from / to.
	npower	BSCP514	2.4.1		For Smart Meters, bullet points a) and b) state that the MOA shall inform the NHHDC of the energisation or de-energisation of any Meter and also the associated initial / final readings. However, the Change

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				<p>Proposal Form itself (bullet point 5) states "The Supplier will notify the energisation status of the Metering System on the Meter Configuration Details flow. The Meter Configuration Details will thus provide the NHHDC with the information needed to validate readings from the Supplier."</p> <p>Which is correct?</p>
npower	BSCP514	2.4.1 b		<p>The MOA shall provide initial / final Meter readings to its Associated Data Collector following energisation or de-energisation of a Meter by the MOA in accordance with this BSCP.</p> <p>This should be at a feeder level like other Meter Types. The new data flows should also indicate the energisation status at feeder level.</p>
npower	BSCP514	6.2.1		<p>Change of NHHMOA (No change of Metering System or Change of Supplier)</p> <p>6.2.1.1 – We do not agree with the optionality placed on the use of the D0155 to notify MOA that they are gaining a Smart meter.</p> <p>6.2.1.11 – We feel sending of Meter Configuration Details from Supplier to MOA should be mandatory. See previous comments on emergency work.</p> <p>6.2.1.12 – Do not understand why this step is necessary as the Supplier is already aware of the Smart Device Details.</p>
npower	BSCP514	Page 60		<p>Need clarity on use of Contract Reference. D155 proposed to be used to notify of Smart but also would be required to retrospectively for existing deployed? We would prefer a new Data Item in the D0155</p>

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					such as a Smart flag.
	npower	BSCP514	6.2.2		<p>New Connection:</p> <p>6.2.2.17 – The timescale against this step is subjective and should be amended to 5 Working Days which would allow the Supplier a further 5 Working Days to fulfil it's 10 Working Day obligation.</p> <p>6.2.2.17 – How does the MOA send the 'Total Cumulative register' reading if the configuration of the meter does not require the total register? What meter Register ID should be used in the D0010? If the Meter Register IDs do not map to the Meter Configuration Details then the Supplier and NHH DC will not be able to use the readings effectively.</p> <p>6.2.2.20/21 – These steps are not relevant to BSCP514 as they do not involve the MOA. This should be removed from BSCP514.</p> <p>6.2.2.22 – Sending of Meter Configuration Details to MOA should not be optional.</p>
	npower	BSCP514	6.2.1.12		<p>Is this step required? Should this be what Supplier already holds? Do not see the value in this step if there is supposed to be alignment between MOA and Supplier in BAU regarding the details held.</p> <p>Can only lead to exceptions? If there are issues would this not be better sorted out via DCC and New MOA?</p>
	npower	BSCP514	6.2.2.1		Process here should also allow for D0155 to show "intention" of Supplier to install a Smart meter via the Contract Reference.

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	npower	BSCP514	6.2.3		Change of NHHDC for an existing Metering System 6.2.3.5/6 - These steps are not relevant to BSCP514 as they do not involve the MOA. We would suggest adding a footnote to the process title to state that the MOA has no obligations to transfer MTDs for Smart metering on a change of NHHDC. This should be removed from BSCP514.
	npower	BSCP514	6.2.4		Concurrent change of Supplier and NHHMOA (No Change to Metering System) 6.2.4.1 - We do not agree with the optionality placed on the use of the D0155 to notify MOA that they are gaining a Smart meter. 6.2.4.12 – This step is not relevant to BSCP514 as it does not involve MOA. This should be removed from BSCP514. 6.2.4.14 – Sending of Meter Configuration Details from New Supplier to New MOA should not be optional.
	npower	BSCP514	6.2.5		Change of Supplier (No Change to Metering System or Change of NHHMOA) 6.2.5.9 - This step is not relevant to BSCP514 as it does not involve MOA. This should be removed from BSCP514. 6.2.5.10 - Sending of Meter Configuration Details from New Supplier to New MOA should not be optional. General – Process is missing a step – New Supplier sends Smart Device Details to New MOA.

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	npower	BSCP514	6.2.5.10		6.2.4.13 places additional logic in the Supplier process to determine where a Change of Agent is concurrent with the CoS. Currently this is not a consideration but should the Dxxxx remain in the MOA area of responsibility with the Dyyyy then only consideration for Supplier.
	npower	BSCP514	6.3.3		<p>6.3.3.2 – We believe that the P0211 should no longer be given as an option in the BSCP where a D0142 based job fails. Instead an appropriate DTC flow (D0221, D0139 or D0002) as appropriate should be utilised.</p> <p>6.3.3.4 – D0313 is incorrect in this step as the meter has been removed.</p> <p>6.3.3.9 - We believe that the P0211 should no longer be given as an option in the BSCP where a D0142 based job fails. Instead an appropriate DTC flow (D0221, D0139 or D0002) as appropriate should be utilised.</p> <p>6.3.3.10 – Timescale should be specific to the step. Current drafting is subjective.</p> <p>6.3.3.11/12 - These steps are not relevant to BSCP514 as they do not involve the MOA.</p>
	npower	BSCP514	6.3.3.13		<p>Would expect either MOA or Supplier to have to send this to NHHDC as a mandated flow - otherwise what is NHHDC matching the "F" read to?</p> <p>Again would prefer this Dxxxx instance is sent from MOA as per previous comments, and not from Supplier.</p>

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	npower	BSCP514	6.3.4	<p>6.3.4.2 - We believe that the P0211 should no longer be given as an option in the BSCP where a D0142 based job fails. Instead an appropriate DTC flow (D0221, D0139 or D0002) as appropriate should be utilised.</p> <p>6.3.4.9 - We believe that the P0211 should no longer be given as an option in the BSCP where a 'Smart Equipment Work Management Request' based job fails. Instead an appropriate DTC flow (D0221, D0139 or D0002) as appropriate should be utilised.</p> <p>6.3.4.10 – This step assumes that the MOA knows the old configuration.</p> <p>6.3.4.11 - Timescale should be specific to the step. Current drafting is subjective.</p> <p>6.3.4.12 - This step is not relevant to BSCP514 as it does not involve MOA. This should be removed from BSCP514.</p> <p>6.3.4.15 - Sending of Meter Configuration Details from New Supplier to New MOA should not be optional.</p> <p>6.3.4.17 - We believe that the P0211 should no longer be given as an option in the BSCP where a 'Smart Equipment Work Management Request' based job fails. Instead an appropriate DTC flow (D0221, D0139 or D0002) as appropriate should be utilised.</p> <p>6.3.4.19 - Timescale should be specific to the step. Current drafting is subjective.</p>
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					<p>6.3.4.21/22 - These steps are not relevant to BSCP514 as they do not involve the MOA. This should be removed from BSCP514.</p> <p>6.3.4.23 - Sending of Meter Configuration Details from New Supplier to New MOA should not be optional.</p>
	npower	BSCP514	6.3.4.8		<p>Is MOA happy that the Dzzzz provides enough data on its own (through SSC and J1267 for example) for the MOA to do the Reconfiguration?</p> <p>Do we expect Comms interaction over the WAN as part of this process or for MOA only to complete the action on Site? (Especially true as the obligation to take Final and Initial Reads has been put into step 6.3.4.10).</p>
	npower	BSCP514	6.3.4.19		Usually the total cumulative register would be recorded as a non Settlement register. If there are issues and nobody can correctly configure the meter then it must be made clear that the total cumulative register is recorded by all parties (MOA and Comms Agent / Supplier) as a Settlement register and this should be made clear when sending the meter details to NHHDCs and LDSOs.
	npower	BSCP514	6.3.4.22 and 6.3.4.23		Need clarity on why these steps are optional?
	npower	BSCP514	6.3.5		<p>LDSO Replaces MS (For Safety Reasons / Urgent Metering Services)</p> <p>6.3.5.4 – LDSO cannot send a D0010 or D0002 to NHHMOA as neither instance is valid in the DTC.</p>

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npower	BSCP514	6.3.5.3		<p>Do we understand this in any more detail?</p> <p>Will the LDSO leave the customer off supply in these scenarios (especially where they no longer have a stock of Traditional Meters that they can call on?) Are we expecting Supplier obligations in this area to change to reflect the actions available to the LDSO or only for Supplier / MOA to have to maintain a 24 hour service?</p>
npower	BSCP514	6.3.5.4		<p>Where a Smart Meter is removed in this scenario would Supply expect the Dxxxx not the D0150?</p> <p>Assuming that the notification from the LDSO to the MOA where there is a Smart meter installed is a Removal Only not a replacement?</p>
npower	BSCP514	7.1-7.4		<p>7.1 Change of Measurement Class from NHH to HH Metering System, 7.2 Coincident Change of Measurement Class from NHH to HH Metering System and Change of Supplier, 7.3 Change of Measurement Class from HH to NHH Metering System and 7.4 Coincident Change of Measurement Class from HH to NHH Metering System and Change of Supplier:</p> <p>We are unsure as to why the CoMC processes have not been picked up by this CP. This creates a BSCP that will prevent CoMCs between Smart and HH. Updates to this section of the BSCP must have the same release date as the Smart MTD updates or a Settlement risk will be created.</p>
npower	BSCP514	9.1		<p>Sealing</p> <p>All ME shall be sealed in accordance with the relevant sections of the Meter Operation Code of Practice Agreement and the relevant Code of Practice (CoP).</p> <p>Does this section need updating in light of Smart, e.g. reference to SMICoP?</p>

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	npower	BSCP514	9.2	<p>Prepayment Meters</p> <p>The new 'Smart Equipment Work Management Request' flow does not cover prepayment details. If MOA has to configure prepayment metering on site then these details need to be included. The prepayment configuration details need to be in the Meter Configuration Details Flow or work request flow to allow the MOA to operate on site.</p>
	Siemens	BSCP514	6.2.1 6.2.4	<p>On change of MOA, the MOA should remain responsible for sending the Meter Asset Details to the new MOA. The supplier should send the configuration Details to the new MOA.</p> <p>The supplier will notify the new MOA that the Metering System has a smart meter using the contract reference in the 'Notification of Meter Operator Appointment and Terms (D155) (or by other means as required). This is a least change approach. It retains current D0170 process for request. It is consistent with the essential principle that the responsibility for sourcing and maintaining the Smart Device Details will remain with the MOA.</p> <p>This is also beneficial for sites that are import / export sites. These have two MPANs and each can have a different supplier but they only have one MOA and one meter (Smart meters will measure import and export energy). In these situations, which will become more and more prevalent, the requirement for a new MOA to contact the previous MOA for Meter Asset Details is very advantageous as it is a single link between parties that know what they need/expect and who are the responsible parties or this date.</p> <p>The CP has the supplier responsible for distributing the Smart Device Details to the appropriate participants on change of MOA and to the new Supplier on change of Supplier.</p> <p>In a concurrent change of MOA and Supplier this requires the transfer of Meter Asset Detail between MOAs via the two suppliers, or more in the case of import / export sites, (instead of directly between these parties). This adds unnecessary complexity and requires more change. This is recognised in point 14 of the CP which states "... the new processes have ONLY been "designed for success"" and that the use of the D0170 through this alternate route has not been prescribed and additional process steps to chase missing flows will be needed. This would require a separate Change Proposal and changes to the</p>

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					DTC will be required to allow Supplier-Supplier and MOP-Supplier instances of the D0170.
	Siemens	BSCP514	6.2.1 6.2.2 6.2.4 6.3.4 (Remote configuration option)	H	<p>The CP states that whenever there is a change to the Meter Configuration Details, the Supplier will forward the Meter Configuration Details to the NHHDC and LDSO (and optionally to the MOA).</p> <p>It would be beneficial to the industry if the Supplier always sends the Meter Configuration Details to the MOA when a meter is re-configured. There are advantages in Agents and Parties holding the 'same version of the truth' in order to work together effectively and efficiently in order to deliver a good level of service to the energy consumer. The change does not preclude this but does not require it. Many parties expressed the view that this should be mandated in the October 2012 consultation exercise for this change proposal.</p> <p>This will aide many industry processes including query management, asset maintenance, fault investigation and correction etc. As these are being sent to the LDSO AND NHHDC sending the same to the MOA would be simple.</p>
	SSE	BSCP514	2.3.2 e)	M	The last sentence inserted for point e) relates to Supplier responsibility for Smart meters. As referenced in our earlier responses, we believe the MOA should still continue to ensure that the Meter Register Ids and/or Meter Register Descriptions in the Meter Configuration Details are reflective of the display on the Meter where the Smart meter has been configured locally.
	SSE	BSCP514	6.2.2.14	H	Suppliers should continue to use D0142 or bilaterally agreed notification for the installation request of a Smart Meter rather than introducing a new dataflow Dzzzz Smart Equipment Work Management Request.
	SSE	BSCP514	6.2.2.17	H	There needs to be a definite x days within which the MOA sends Smart Meter Technical Details, as relevant, to the Supplier.
	SSE	BSCP514	6.2.2.20 &	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should be

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			6.2.2.21		placed only in BSCP504 & BSCP515 as relevant to the NHHDC/LDSO.
SSE	BSCP514		6.2.3.5 & 6.2.3.6	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should only be placed only in BSCP504 as relevant to the NHHDC.
SSE	BSCP514		6.3.3.8	H	Suppliers should continue to use D0142 or bilaterally agreed notification for the installation request of a Smart Meter rather than introducing a new dataflow Dzzzz Smart Equipment Work Management Request.
SSE	BSCP514		6.3.3.11	H	There needs to be a definite x days within which the MOA sends Smart Meter Technical Details, as relevant, to the Supplier.
SSE	BSCP514		6.3.3.12 & 6.3.3.13	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should be placed only in BSCP504 & BSCP515 as relevant to the NHHDC/LDSO.
SSE	BSCP514		6.3.4.8	H	Suppliers should continue to use D0142 or bilaterally agreed notification for the installation request of a Smart Meter rather than introducing a new dataflow Dzzzz Smart Equipment Work Management Request.
SSE	BSCP514		6.3.4.11	H	There needs to be a definite x days within which the MOA sends Smart Meter Technical Details, as relevant, to the Supplier.
SSE	BSCP514		6.3.4.12 & 6.3.4.14	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should be placed only in BSCP504 & BSCP515 as relevant to the NHHDC/LDSO.
SSE	BSCP514		6.3.4.16	H	Suppliers should continue to use D0142 or bilaterally agreed notification for the installation request of a Smart Meter rather than introducing a new dataflow Dzzzz Smart Equipment Work Management Request.

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	SSE	BSCP514	6.3.4.19	H	We disagree with the use of the Smart Device Details flow being used for the removed Legacy meter when there is a Legacy-Smart Meter exchange. The Legacy meter should continue with existing obligations/actions.
	SSE	BSCP514	6.3.4.21 & 6.3.4.22	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should be placed only in BSCP504 & BSCP515 as relevant to the NHHDC/LDSO.
	SSE	BSCP514	6.3.5.3	M	Does this require further clarification to explain that this will be subject to the relevant contractual arrangements made for Emergency Metering between Suppliers/their MOAs and the LDSOs?
	SSE	BSCP514	6.4.1.13	H	There needs to be a definite x days within which the MOA sends Smart Meter Technical Details, as relevant, to the Supplier.
	SSE	BSCP514	6.4.1.16 & 6.4.1.17	M	The actions in these steps should be removed from BSCP514 as not relevant to MOA. They should be placed only in BSCP504 & BSCP515 as relevant to the NHHDC/LDSO.
	Western Power Distribution	BSCP514	6.3.3.8	H	Add a step for Supplier to send a copy of this flow to the LDSO to inform them of their intention to remove a smart meter, when the SMS device type and SMS action code indicate this. Prior to meter removal the LDSO may want to collect profile data, voltage data and event log data for network management and regulatory purposes. It is accepted that this may mean LDSO could collect data for meters that were not removed due to MOA rejecting the request or being unable to complete the job but this should be limited circumstances and manageable for the LDSO. A DTC change to add a new flow instance of Supplier to LDSO to the new Smart Equipment Work Management Request will also be needed. An alternative would be for MOA to inform the LDSO prior to removing the meter but this would be a

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					new process, require a new flow and therefore be more onerous.
	Western Power Distribution	BSCP514	6.3.4.16	M	Clarify sub-heading above this step as it is confusing. When Meter Operator replaces a smart Meter (including replacement of a non-smart Meter by a smart Meter) Is it replacing a smart meter or is it replacing any NHH settled meter with a smart meter? Have assumed it is the latter.
	Western Power Distribution	BSCP514	6.3.4.16	H	As per comments against 6.3.3.8, Supplier to send a copy of the work request to LDSO when they are requesting replacement of a smart meter.
	Western Power Distribution	BSCP514	6.3.5.3	M	Suggest the new paragraph relating to LDSO replacement of smart meter under UMS is removed at this stage as I understand that discussions about UMS in the smart world are ongoing within the CERG OI group.
	npower	BSCP515	3.3.7		For HH Smart Meters This should read 'For HH Meters'.
	SSE	BSCP515	general	H	Please refer to earlier comments for BSCP504 & BSCP514 where Supplier to LDSO actions/dataflow instances have been documented. To ensure clarity for Suppliers and LDSOs, BSCP515 should contain the relevant obligations and notifications for the different business processes. Example from BSCP514 that is not included in redlining extract for BSCP515: When Supplier configures a smart Meter (other than as part of a Meter installation or Meter replacement), the Supplier will notify LDSO of new configuration etc.

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Western Power Distribution	BSCP515	3.3.5 - 3.3.7	H	<p>The sub-section headings are confusing and potentially leave gaps.</p> <p>3.3.5 For NHH Meters other than smart meters</p> <p>3.3.6 For Smart Meters</p> <p>3.3.7 For HH Smart Meters</p> <p>What about HH Meters that are not "smart"? If the answer is "all HH meters are smart" then change the sub-section heading from "HH Smart Meters" to "All HH Meters". Otherwise a "HH Non-Smart Meters" sub-section is needed.</p> <p>3.3.6 "For Smart Meters" We think it would be beneficial to add a footnote to make it clear that this covers all SMETS compliant meters even if they are not WAN connected and will operate in a "dumb" mode.</p>
SSE	SVA Data Catalogue Vol.1			As per our earlier comments regarding duplication of instances of dataflows from/to parties that should appear only in relevant party BSCP.
SSE	SVA Data Catalogue Vol.2			We require clarification on the reasons for introducing the new data items for 'Smart Meter Manufacturer', 'Smart Meter Model', 'Smart Meter Version' when we have 'Manufacturers Make & Type'. What is the purpose/benefit of these new data items? We would seek to understand the cost (v any benefit) and delays to implementation by adding complexity with new data items.
SSE	SVA Data Catalogue Vol.2			We require clarification on the reasons for introducing SMS Device Type and SMS Action Code. What is the purpose/benefit of this, as set out in the proposal, we cannot see the difference with the {MSCD} and the {SCON}.
SSE	SVA Data Catalogue			We require clarification on the reasons for introducing Effective from Settlement Date {MSCD}. What is the purpose/benefit of this?

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**Any Questions**

If you have any queries, please contact:

CCC@elexon.co.uk

		Vol.2			
	SSE	SVA Data Catalogue Vol.2			On the Smart Device Details flow we note that there is a proposed datagroup of Meters and IHDs refused. In the event a customer has refused a Smart Meter, we would expect the MOA to advise the Supplier in the same means as a customer refusing a non-Smart Meter install, rather than sending this flow.
	EDF Energy	Data Flows – DTC Annex B / D			We recommend replacing “Device Location” and “Meter Location” with just “Location” therefore only needing to maintain one list.
	EDF Energy	Data Flows – DTC Annex B / D			On the Smart Equipment Work Management Request flow, on the Smart Meter group condition this should read SMS Device =E. We believe that “G” meters are fit type meters and wouldn’t be used for settlement, however we would like this confirmed. Also replace Communications Hub with “Other Device” and therefore remove the need for the “Other SMS Device” group.
	EDF Energy	Data Flows – DTC Annex B / D			On the Meter Configuration Details flow, if this reported all not just the changes there would only be the need for one date. This would mean that the “Effective From Settlement Dates (MSCD/MSNFC/SCON) could be removed. Also will an MPAN ever require multiple Smart Meters, if not then this could be included in the first group. In the Meter Register group why is the “Meter Register Description” Optional.
	EDF Energy	Data Flows – DTC Annex B / D			On the Smart Device Details flow, why is CT Ratio required and also Manufacturer Make & Type.
	EDF Energy	Data Flows – DTC Annex B / D			SMS Device Type – We have some questions for the device types: 1)Is the “Boost Button” a device type, 2) Why is Water Meter required.

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	npower	Annex B data flow			Smart Equipment Work Management Request does not allow for MOA to configure prepayment meters if WAN comms are not available.
	npower	Annex B data flow			<p>Smart Device Details:</p> <p>Is there a need for the flow to allow for feeder status level energisation rather than MPAN level? The current D0150 does not allow for this and there are instances where more than one meter exists on an MPAN that one is energised whilst the other is not?</p> <p>Date of Meter Installation:</p> <p>This field should be mandatory as it can be a useful item when undertaking such tasks as data cleansing and causes issues in the current NHH market where it is not always available on a CoA.</p> <p>Test Date should be mandatory.</p> <p>Next Test Sample Date should be mandatory if known or applicable.</p> <p>Notes section states - Details of other Smart Metering System (SMS) devices should be excluded when Smart Device Details are sent to the NHHDC or Distributor. CT Ratio is not required for Smart meters and has been included as an optional group for the purposes of "future-proofing". This appears to contradict the BSCP which suggests these data items will always be sent but the NHHDC and LDSO are not obligated to use them.</p>
	npower	Annex B data flow			<p>Meter Configuration Details:</p> <p>Is there a need for the flow to allow for feeder status level energisation rather than MPAN level? The current D0150 does not allow for this and there are instances where more than 1 meter exists on an MPAN that one is energised whilst the other is not?</p> <p>Add remote enabled / disabled at meter level.</p> <p>Add operating mode (Credit or Pre-pay) – but other flows need to be updated.</p>

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	npower	Annex B data flow			<p>Use of 'Manufacturers Make & Type' (J0410):</p> <p>This value currently exists in the DTC to describe Meters, both HH and NHH traditional and AMR which are used in Settlements and is a key value for MOA and systems already built to manage these. However in the flow called Smart Device Details, this item has been used to describe 'other Smart devices installed' and new items created to describe the Smart meter called 'Smart Meter Manufacturer', Smart Meter Model & Smart Meter Version. We feel that the new flows should either use the existing J0410 to describe the Smart Meter Manufacturer Model and Version or as shown, introduce a new data item but should not use the J0410 data item to suddenly describe what is a new entity in the shape of 'other devices'. This if anything should have new data items. Our preferred outcome would be to keep the new Smart Meter Data Items and replicate these fields for Smart Devices.</p> <p>Depending on the outcome of this there would be a consequential impact on the proposed flow called 'Smart Equipment Work Management Request'.</p> <p>Interestingly all of these flows combined have used the phrase 'meter', 'device' and 'equipment'. There needs to be one common phrase as a Smart 'system'.</p>
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