



CP Report – CP1405

Meeting Name Supplier Volume Allocation Group

Meeting Date 4 March 2014

Purpose of paper For Decision

Summary This report provides details of the background, solution, impacts and industry views of CP1405 'Facilitating Faster Switching in the NHH Market'. ELEXON invites the SVG to approve this CP for implementation on 6 November 2014 as part of the November 2014 Release.

1. Why Change?

Change of Supplier process

The Non Half Hourly (NHH) Change of Supplier (CoS) process ensures that, whenever a NHH customer changes Supplier, the new Party Agents are appointed and all necessary information is passed from the old agents to the new. When the new Supplier is notified that the customer is switching to them, they will need to appoint the new NHH Data Aggregator (DA), Data Collector (DC) and Meter Operator Agent (MOA). They will also need to notify the new agents of the current agents (where different) and of each other. If required, the new agents will then request the necessary information from the current agents, primarily the Meter Technical Details (MTDs) and read histories, ahead of the agreed date for the change to take place. A CoS Meter reading also needs to be obtained and agreed, to allow the old Supplier to provide a final bill to the customer and the new Supplier to begin billing from that point.

The current end-to-end NHH CoS process can take up to 27 Working Days (WDs) to complete, if the steps regarding the appointment of new Supplier Agents and the passing of the MTDs and read histories take the maximum allowed time to complete. The times allowed for some of these steps are significantly longer than they actually take to complete, which introduces a large amount of potential 'dead time' into the process, making it less efficient than it could be. Suppliers will mitigate the impact this may have on a CoS by setting the Supply Start Date (SSD) as far in the future as necessary. A summary of the current timeline for the CoS process can be found in Appendix 1.

Customers who have prepayment Meters installed will also need their Meter to be reconfigured with their new tariff by the new Supplier on the SSD, in order for them to be able to benefit from the new Supplier's tariff from the SSD. For this to happen, the customer would need to be issued with their new card or key prior to the SSD. This requires the new Supplier to be in possession of the MTDs prior to this point.



What is the issue?

The Department of Energy and Climate Change (DECC) is keen to shorten the amount of time it takes for customers, especially domestic customers, to switch Supplier. Energy UK has considered a range of measures to reduce the overall process timescales. It considers that the current NHH CoS process timescales are a potential barrier to implementing a faster Supplier switching experience, and should be shortened. The Proposer of CP1405 has raised this CP in order to progress these recommendations.

The Proposer considers that reducing the maximum times allowed within the relevant BSC Procedures (BSCPs) for these processes will improve the efficiency of the NHH CoS process. It will help to reduce the overall time it takes for domestic customers to change Supplier, as proposed by DECC, by removing the potential dead time from the process. The Proposer believes that the proposed approach will allow this to be realised without impacting Settlement integrity.

2. Solution

Proposed solution

This CP proposes to reduce the time allowed for the following steps in the NHH CoS process:

Proposed Timescale Changes		
Step	Current	Proposed
New agents send response to appointment requests	10WD	2WD
Supplier sends notification of current agents to new agents	5WD	1WD
New agents send request to current agents for MTDs or read history	2WD	1WD
Current agents send MTDs or read history to new agents	5WD	2WD
New agents provide MTDs or read history to relevant parties	5WD	1WD

Adopting these proposed timescales will reduce the maximum end-to-end duration for the agent appointment and data transfer activities within the NHH CoS process from 27WD to 7WD. A summary of the proposed timeline for the CoS process can be found in Appendix 2. These revised timescales would apply to all NHH customers, not just domestic customers.

There is currently no process for dealing with the contractual appointment of the new NHHDA and its subsequent response within the BSCPs, as the NHHDA is expected to act upon notification of its appointment from the Supplier Meter Registration Service (SMRS). Therefore, for completeness, this step will also be added. This will ensure that a Supplier is not jeopardised by electing to wait until it has received acceptance from all its newly appointed agents before sending any notifications of the current agents. In addition, for any Supplier that does elect to follow this approach, the 1WD timescale for issuing the notifications will start from the point the final acceptance is received.



The current Performance Assurance Reporting and Monitoring System (PARMS) serials for the transfer of MTDs and read histories are based on data flows outstanding at each Settlement Run type. They don't take into account the number of Working Days in the relevant obligation. As such it is not expected that any consequential changes will need to be made. If any changes to PARMS serials are identified, they will be subject to a separate CP.

The Proposer also notes wider discussions by Ofgem's Change of Supplier Expert Group (CoSEG) on the CoS process for smart Meters that are being progressed under [Issue 53 'Reforming the Change of Supplier meter read process for smart electricity meters'](#). The Proposer considers that CP1405 will help customers without a smart Meter to be able to change Supplier in similar timescales to those that have been proposed for smart Meters.

3. Impacts and Costs

Central impacts and costs

CP1405 will require updates to the Code Subsidiary Documents (CSD) listed in the table below. The proposed changes to these documents can be found in Attachments A-D. No changes to central systems will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'BSCP505 'Non-Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'SVA Data Catalogue Volume 1	<i>None</i>

The central implementation costs for CP1405 will be approximately £240 (1 man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

CP1405 will impact Suppliers, NHHDA, NHHDCs and NHHMOAs, who will need to complete steps in the CoS process to shorter timescales. The steps being shortened relate to the issuing of requests (either for the appointment of the new Supplier Agents or for the requests for the MTDs or read history) or the subsequent



response to these requests. Suppliers and Supplier Agents who allow for the current maximum timescales for each step in their internal processes will need to amend these accordingly to account for the shortened timescales.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Steps in the NHH CoS process will need to be completed in much shorter timescales than currently. Updates may be required to participants' systems and processes to account for these reduced timescales, and updates may be required to contractual arrangements.
NHHDA	
NHHDC	
NHHMOA	

Several BSC Parties and Party Agents who responded to the Participant Impact Assessment for CP1405 identified minimal or no costs required to implement the CP. Others considered that they would incur low to medium costs. Some participants have been unable to provide information on the expected costs of CP1405.

The full responses made by participants on the expected impacts and costs for CP1405 can be found in Attachment E.

4. Implementation Approach

Proposed Implementation Date

We recommend that CP1405 is implemented on **6 November 2014** as part of the November 2014 BSC Systems Release.

The Proposer believes that the shortening of the timescales for the CoS process should come into effect as soon as possible. They therefore consider that CP1405 should be implemented as part of the June 2014 Release (26 June 2014), as this is the earliest available Release in which this CP can be included. A majority of participants who responded to the Participant Impact Assessment for CP1405 agreed with this proposed Implementation Date.

However, three respondents disagreed. One respondent noted that their lead time for CP1405 would be too long to be able to implement as part of the June 2014 Release, although they have confirmed that they would endeavour to meet a June 2014 Implementation Date if CP1405 was approved for this date. Another respondent considered that they would find implementing CP1405 in June demanding, stating a preference for implementing in the November 2014 Release. A third respondent also considered that implementing CP1405 in June would be demanding, and believed that it would be more appropriate to align CP1405 with related Master Registration Agreement (MRA) and Uniform Network Code (UNC) changes that are due to be implemented in November 2014.

The full responses made by participants regarding the proposed Implementation Date for CP1405 can be found in Attachment E.



After considering these responses, we believe that it would be more appropriate to implement CP1405 on 6 November 2014 as part of the November 2014 Release. This would allow participants more time to implement the changes and would align this CP with other related changes within the industry.

5. Industry Views

We received 10 responses to the Participant Impact Assessment for CP1405, of which seven agreed with the proposed solution, one disagreed and two were neutral. The responses received are summarised in the following table and the full collated participant responses can be found in Attachment E.

Summary of Responses for CP1405			
Organisation	Capacity in which Organisation operates	Agree?	Impacted?
Electricity North West	Licensed Distribution System Operator (LDSO)	Neutral	No
TMA Data Management Ltd	Party Agent	Yes	Yes
GDF SUEZ Energy UK	Supplier	Yes	Yes
EDF Energy	Supplier, Party Agent	Yes	Yes
Siemens Metering, Communications & Services	Party Agent	Yes	Yes
ScottishPower	Supplier, generator, LDSO, Party Agent	No	Yes
RWE Npower	Supplier, Party Agent	Yes	Yes
SSE Energy Supply Ltd	Supplier, Party Agent	Yes	Yes
IMServ Europe Ltd	Party Agent	Neutral	Yes
Centrica	Supplier, generator	Yes	Yes

Would shortening the timescales resolve the issue?

Several respondents who supported the change considered that speeding up the switching process would improve customer perceptions around switching Supplier, and so would ultimately benefit the end-consumer. One respondent also noted that CP1405 would be an expedient solution to reducing timescales, and is a necessary change required as part of the wider suite of changes taking place for faster switching. The respondent who disagreed with CP1405 noted that they did agree with the principle, and that their disagreement is due to their belief that there are a number of key processes that needed to be included in the change.

However, a couple of respondents considered that it wouldn't necessarily achieve the desired objective. They noted that most flow exchanges happen within the proposed timescales anyway, and considered that most Supplier Agents would generally send information as soon as they receive the request. Consequently, shortening the timescales would not speed up this process. They also noted that any flow exchanges that don't happen within



these timescales would have usually failed to do so for valid reasons, and that shortening the timescales to resolve these exceptions wouldn't necessarily mean participants would send them any quicker.

Should the timescales for other agent appointment processes also be shortened?

A couple of respondents considered that the timescales for other agent appointment processes, such as for Half Hourly (HH), unmetered supplies (UMS) and new connections, should be aligned with the changes proposed for NHH under CP1405. One respondent considered that the process for appointing agents should be the same irrespective of the trading market.

We note that each of the different agent appointment processes highlighted have their own separate processes and issues, and so it would be difficult to align them all to the same timescales. In addition, as each process is different, it may also be inappropriate and unnecessary to seek to align them to the same timescales. For example, the HH process doesn't include a CoS read and is less reliant on the transfer of reading histories between agents. HH CoS events usually take place as part of the bi-annual contract rounds, while the NHH process is more ad-hoc. We therefore do not believe that the other processes need to be aligned with the timescales proposed for the NHH process under this CP.

How does CP1405 impact the calculation of EACs?

Some respondents highlighted concerns with the shortening of the timescale for the old NHHDC to send the read histories (the D0152 'Metering System EAC/AA Historical Data' and the D0010 'Meter Readings' flows) to the new NHHDC (BSCP504 3.2.6.7). The old NHHDC will have 2WD to respond to a D0170 'Request for Metering System Related Details' flow. If the old NHHDC has recently processed a reading when the D0170 flow is received, the corresponding Estimated Annual Consumption (EAC) may not have been calculated by the time that the D0152 flow is due. Sending a reading without a corresponding EAC causes problems for NHHDC system validation and a footnote was previously added to BSCP504 3.2.6.5 to ensure that this doesn't occur. Calculation of the new EAC can take 1WD or 7WD, depending on whether the NHHDC waits until the relevant Daily Profile Coefficients are outside the period in which they can be disputed. Both respondents considered that the shortened timescale of 2WD for responding to a request for the read history would not allow the calculation of the EAC to happen any quicker under the limited circumstances where a read had been taken shortly before the request for a reading history.

One respondent considered that the timescale for this step could be amended to require the read histories to be sent either:

- Within 2WD of receipt of the request if an EAC has been calculated for the latest valid meter read; or
- Within 1WD of the calculation of the EAC if an EAC has not been calculated for the latest valid meter read.



We consider that this is a sensible proposal, and have amended the attached proposed redlining accordingly. The read history will be sent within 2WD in a significant majority of cases. In a small minority of cases, the read history will be delayed, but the CoS process will benefit from a recent reading and matching reading and EAC pair.

Should the MTD flows be split?

Two respondents queried the proposed amendment to BSCP514 6.2.4.9, which would allow the D0313 'Auxiliary Meter Technical Details' flow to be delayed until SSD-1WD for Remotely Read NHH Meters as defined in BSCP514 9.3¹. One respondent considered that sending the D0313 flow separately to the D0149 'Notification of Mapping Details' and D0150 'Non Half Hourly Meter Technical Details' flows could be complicated and expensive to implement. The other noted that this would dis-align these two parts of BSCP514.

The first respondent proposed an amendment to allow the old NHHMOA to send the D0313 flow without the J1713 'Outstation Password Level 3' data item at the point of request, and resend it later with the password included on the de-appointment date. This solution has been discussed in relation to the Change of Measurement Class (CoMC) process as part of [Issue 49 'Change of Measurement Class \(CoMC\) process for Advanced Meters'](#) and you can find further details on these discussions in the Issue 49 Group's final report to the BSC Panel ([Panel 221/08](#)).

We propose a minor amendment to the redlined text to allow the MTDs (including the D0149, D0150 and D0313) for advanced Meters to be sent up to SSD-1WD. This amendment has been included in the attached proposed redlining. If the timescales in Appendix 2 were adopted, this would only result in a delay of 1WD for advanced Meters, where the old NHHMOA had concerns about releasing the Outstation Password Level 3.

Is it possible to receive the read history before the MTDs?

One respondent highlighted a concern around the timing of some of the steps, and queried whether this could potentially allow the new NHHDC to receive the read history before it receives the MTDs. The timing of the steps under CP1405 does allow this scenario to occur, but we highlight that this scenario is also possible under the current timescales.

¹ These are Meters for which the Meter Type is listed as one of: 'RCAMR' (Remotely Configurable Automated Meter Reading); 'NCAMR' (Non-Remotely Configurable Automated Meter Reading); or 'RCAMY' (Remotely Configurable Automated Meter Reading with Remote Shutdown Capability).



Is reference needed to the J0028 data item under CP1405?

One respondent highlighted the reference in the footnote to BSCP504 3.2.6.7 to the J0028 'Date Action Required By' data item within the D0170 'Request for Metering System Related Details' flow. They consider that this would no longer be applicable under CP1405 and should be deleted.

The first part of this footnote states that the old NHHDC should send the read history upon receipt of a D0170 flow, irrespective of whether they had received a D0151 'Termination of Appointment or Contract by Supplier' flow. This remains the case under CP1405. The second part of the footnote refers to the old timescale of 'prior to SSD+8'. If the old NHHMOA hadn't received a D0151 flow, they would not know the SSD, hence the use of the J0028 data item on the D0170 flow. Under the new timescales, the history has to be sent within 2WD of the request, so there is no need to use the J0028.

We therefore agree with the respondent's comment and have removed this sentence from the footnote in the attached proposed redlining.

What is the definition of a Working Day?

One respondent sought clarity over the definition of a Working Day, and understood it to be based around Business Hours (defined in the BSC to be 0900 to 1700 unless otherwise stated). They believed that if, for example, a flow arrived before 1700 on a Monday with a 1WD turnaround, the recipient would have until 1700 on the Tuesday to respond. However, if the flow did not arrive until after 1700 on the Monday, the recipient would have until 1700 on the Wednesday to respond. In this scenario, the flow received after 1700 would be deemed not to have been received by the recipient until 0900 on the next Working Day, giving them until the subsequent Working Day to respond. We can confirm that this interpretation is correct.

Comments on the proposed redlining

Several respondents provided comments on the proposed redlining for CP1405, and a summary of these comments and our responses can be found in Appendix 3. We have therefore made some changes to the proposed redlining for BSCP504 and BSCP514 both in response to these comments and to the areas highlighted above.

We have made the following amendments to the proposed redlining for CP1405 from the versions that were issued as part of the Participant Impact Assessment:

- BSCP504 3.2.6.4: Amend "Send notification of NHHDC ,NHHDA and current NHHMOA" to "Send notification of old NHHDC, new NHHDA and new NHHMOA (as applicable)".



- BSCP504 3.2.6.7: Amend "If applicable and within 2 WD of 3.2.6.6" to "If applicable within 2 WDs of 3.2.6.6 provided an EAC has been calculated for latest valid reading or within 1 WD of EAC being calculated for latest valid reading if an EAC has yet to be calculated".
- BSCP504 3.2.6.7 footnote: Delete "Where no D0151 flow has been received, the Supply Start Date can be derived from the 'Date Action Required By' (J0028) data item on the D0170 flow".
- BSCP514 6.2.4.8: Amend "Within 1 WD of 6.2.4.6" to "Within 1 WD of 6.2.4.7".
- BSCP514 6.2.4.9: Amend "For those Meters defined in Appendix 9.3, the D0313 may be sent as late as SSD – 1WD to maintain security" to "For those Meters defined in Appendix 9.3, the D0149, D0150 and D0313 may be sent as late as SSD – 1WD to maintain security".

The redlined versions of BSCP504 and BSCP514 in Attachments A and C include these changes. No changes have been made to the redlining for BSCP505 or the SVA Data Catalogue Volume 1, as set out in Attachments B and D, from the versions issued for consultation.

6. Recommendations

Assessment review

We note that one of the 10 respondents to the Industry Impact Assessment disagreed with CP1405. While they agree with the principle of faster switching, they consider that there are a number of key processes that need to be included in the change, including to PARMS and to other agent appointment processes. We note that it is not expected that the shortening of timescales would require any changes to PARMS serials, as highlighted in Section 2. However if any changes are identified, they would be progressed via a separate CP. We also believe that it is unnecessary to seek to align all the agent appointment processes across different markets for the reasons outlined in Section 5. No other respondents disagreed with CP1405.

We also note that three of the 10 respondents disagreed with the proposed Implementation Date of 26 June 2014, and considered that it should be implemented instead on 6 November 2014. Having considered these responses, we agree that it would be prudent to move implementation of CP1405 to the November 2014 Release for the reasons outlined in Section 4.



Recommendations

ELEXON invites the SVG to:

- **AGREE** the amendments to the proposed redlining for BSCP504 and BSCP514 for CP1405 made following the Participant Impact Assessment;
- **APPROVE** the proposed changes to BSCP504, BSCP505, BSCP514 and the SVA Data Catalogue Volume 1 for CP1405; and
- **APPROVE** CP1405 for implementation on 6 November 2014 as part of the November 2014 Release.

Appendices:

Appendix 1: Current Timeline for the NHH CoS Process

Appendix 2: Proposed Timeline for the NHH CoS Process

Appendix 3: Comments on the Proposed Redlining

Attachments:

Attachment A: BSCP504 proposed redlining v0.2

Attachment B: BSCP505 proposed redlining v0.1

Attachment C: BSCP514 proposed redlining v0.2

Attachment D: SVA Data Catalogue Volume 1 proposed redlining v0.1

Attachment E: CP1405 Collated Responses²

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² One of the responses received to CP1405 included confidential information. Therefore, the version of Attachment E issued to SVG Members includes this confidential information, while the version published on the BSC Website does not.



Appendix 1: Current Timeline for the NHH CoS Process

Current Timeline for the NHH CoS Process																	
Timescale (SSD ±WD)	MOA						DC				DA		CoS Read				
	New Supplier appoints New MOA	New MOA accepts appointment	New Supplier notifies New MOA of Old MOA, DC etc.	New MOA requests MTDs from Old MOA	Old MOA sends MTDs to New MOA	New MOA sends MTDs to New DC, Supplier & DNO	New Supplier appoints New DC	New DC accepts appointment	New Supplier notifies New DC of Old DC, DA etc.	New DC requests reading history from Old DC	Old DC sends reading history to New DC	New Supplier appoints New DA	New DA accepts appointment	CoS Reading Window	New DC determines CoS reading	New DC sends CoS read to New Supplier & Old DC	Old DC sends CoS read to Old Supplier
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-18																	
-17																	
-16																	
-15																	
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+9																	
+10																	

Each column denotes an activity within the CoS process, and the shaded cells indicate the current times when these activities currently take place in relation to the SSD, if the maximum allowed time was taken for each step.



Appendix 2: Proposed Timeline for the NHH CoS Process

Proposed Timeline for the NHH CoS Process																	
Timescale (SSD ±WD)	MOA						DC				DA		CoS Read				
	New Supplier appoints New MOA	New MOA accepts appointment	New Supplier notifies New MOA of Old MOA, DC etc.	New MOA requests MTDs from Old MOA	Old MOA sends MTDs to New MOA	New MOA sends MTDs to New DC, Supplier & DNO	New Supplier appoints New DC	New DC accepts appointment	New Supplier notifies New DC of Old DC, DA etc.	New DC requests reading history from Old DC	Old DC sends reading history to New DC	New Supplier appoints New DA	New DA accepts appointment	CoS Reading Window	New DC determines CoS reading	New DC sends CoS read to New Supplier & Old DC	Old DC sends CoS read to Old Supplier
-19																	
-18																	
-17																	
-16																	
-15																	
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Each column denotes an activity within the CoS process, and the shaded cells indicate the new times when these activities would take place in relation to the SSD should CP1405 be approved.

**Appendix 3: Comments on the Proposed Redlining**

Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
TMA Data Management Ltd	BSCP504 3.2.6.4	"Send notification of NHHDC ,NHHDA and current NHHMOA" should read "Send notification of NHHDC ,NHHDA, current NHHMOA and old NHHDC" If the NHHDC is not informed of the previous agent's details, it cannot send the D0170 within the required timescales.	We have amended this wording to: "Send notification of old NHHDC, new NHHDA and new NHHMOA (as applicable)."
EDF Energy	BSCP504 3.2.6.7	<p>The revised step 3.2.6.7 requires Old NHHDC to send historic data to New NHHDC within 2 WDs of receipt of a D0170. However footnote 4 on same page mandates that there must be an EAC for the most recent valid reading sent by Old NHHDC. Under current proposed rules Old NHHDC would need to send history even if an EAC had not been calculated. This could mean NHHDC would need to account for this which would increase costs of change.</p> <p>A solution would be for step to have timings as:</p> <p>If applicable within 2 WDs of 3.2.6.6 provided an EAC has been calculated for latest valid reading or within 1 WD of EAC being calculated for latest valid reading if an EAC has yet to be calculated.</p>	We have amended this wording to: "If applicable within 2 WDs of 3.2.6.6 provided an EAC has been calculated for latest valid reading or within 1 WD of EAC being calculated for latest valid reading if an EAC has yet to be calculated."



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
Siemens Metering, Communications & Services	BSCP504 3.2.6.7 footnote	Note 3 - referring to the "Supply Start Date can be derived from the 'Date Action Required By' (J0028) data item on the D0170 flow. " - should be deleted. Under the CP it is not applicable to section 3.2.6.7	We agree that this reference should be deleted. We have therefore removed the words "Where no D0151 flow has been received, the Supply Start Date can be derived from the 'Date Action Required By' (J0028) data item on the D0170 flow" from this footer.
ScottishPower	BSCP504 3.2.6.1	3.2.6.1 suggests that the supplier can appoint agents at any point (as required), not necessarily during the CoS process. Should it instead say following receipt of a D0217 and D0260, or something similar	<p>We agree that the process will actually only start on receipt of the data flows from the Meter Point Administration Service (MPAS) confirming the registration request has been accepted. The absence of a reference to the D0217 'Confirmation of the Registration of a Metering Point' and D0260 'Notification from MPAS of Old Supplier Registration Details' flows is an omission in the existing BSCPs and CP1405 is not seeking to address this.</p> <p>The use of "as required" in BSCP504 mirrors the existing timescale in BCP514. It allows Suppliers greater flexibility (for example, in terms of whether to wait for the end of the objection period before appointing agents). ScottishPower has noted that they agree that a Supplier can choose when they begin the process.</p>



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
ScottishPower	BSCP504 3.2.6	Is 3.2.6 CoS with CoDC? It features new NHHDC appointment flow. If so, why isn't NHHDC de-appointment by Old Supplier in this process and accounted for time wise?	NHHDC de-appointment has not been included as it is not currently included in this BSCP. The transfer of read histories and MTDs is not dependent on the receipt of a de-appointment flow. As this is an existing omission and one that does not impact the objective of CP1405, the CP is not seeking to address it.
ScottishPower	BSCP504 3.2.6.19	3.2.6.19 – shouldn't it be within 2WD as per the CP form?	The expectation is that the NHHDC will provide the reading and EAC/AA histories within 2WD. In the event that the NHHDC is unable to provide the data, the exception processes will be invoked. 3.2.6.19 relates to the exception processes. These are likely to involve manual steps in order to resolve the original failure. CP1405 is not seeking to reduce the timescales for follow-up exception processes, because it is recognised that more time will be needed.
ScottishPower	BSCP504	Generally – where the timescales are SSD+8 etc should they now be reviewed to tie in with the CP? For example 3.2.6.18, 3.2.6.20?	This CP does not propose to change any of the timescales around SSD+8, it only seeks to reduce the timescales around agent appointment. These timescales are therefore outside of the scope of this CP.



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
ScottishPower	BSCP504 3.2.6.21	3.2.6.21 is reference to 3.2.6.20 correct? How would a supplier know the NHHDC has sent the D0170?	3.2.6.21 is only triggered if 3.2.6.20 has been followed. 3.2.6.20 would result in the new Supplier receiving a D0170 from the new NHHDC, which the new Supplier would then act upon under 3.2.6.21. However, if 3.2.6.20 does not need to be followed then no D0170 would be sent and 3.2.6.21 would not need to be followed.
ScottishPower	BSCP504 3.2.6.24	3.2.6.24 – shouldn't this have a validation period? For example within 5WD of receipt of D0071?	<p>The intention of CP1405 is to reduce the timescales for agent appointments and data transfers (which can currently take up to a maximum of 27WD, albeit that they may not in practice) such that information can be transferred in time for SSD (and for prepayment meters, the customer can benefit from the new Supplier's tariff rates from SSD).</p> <p>BSCP504 doesn't currently specify timescales for validating readings. The implicit timescale is that they are validated on receipt of the reading history that enables validation to take place. If there is evidence that NHHDCs are 'sitting on' readings, then we agree that an additional CP to introduce validation timescales could be beneficial.</p>



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
ScottishPower	BSCP505 3.2.1.1	As per comments on BSCP504 – should this be as required or should it spell out it is part of a CoS	The NHHDA is required to act upon the D0209 flow from the SMRS, which will be sent within 1WD of receipt of the D0055 'Registration of Supplier to Specified Metering Point' flow (as set out in BSCP501). As a contractual-only appointment flow, the Supplier can choose when to send the D0153.
ScottishPower	BSCP505 3.2.1.4	Needs timescales, e.g. within 2WD or receipt of D0205 or by SSD or effective date of change of agent	The timescales for step 3.2.1.4 are covered under BSCP501. We note the suggestion that the timescales could be replicated in BSCP505 for clarity, but also note that this process step has not been added by CP1405, so the absence of timescales is long-standing.
ScottishPower	BSCP514	There is no change to the MOA de-appointment time, which remains at 5WDs. This may run a greater risk of appointment overlap, whereby the shortened appointment time causes two MOAs to be concurrently appointed to the same metering point.	CP1405 only seeks to shorten the timescales for the agent appointment and data transfer steps as these are on the critical path for a timely CoS process. The transfer of MTDs is no longer dependent on the receipt of a de-appointment flow. We also consider that there is natural incentive for a Supplier to de-appoint the old MOA as soon as possible, and we note that if concurrent appointment was to occur, the SMRS-registered MOA would take precedence.



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
ScottishPower	BSCP514 6.2.4.1	As 504 and 505 – is as required specific enough?	<p>We agree that the process will actually only start on receipt of the data flows from MPAS confirming the registration request has been accepted. The absence of a reference to the D0217 and D0260 is an omission in the existing BSCPs and CP1405 is not seeking to address this.</p> <p>BSCP514 has always used “as required” for this step with no adverse consequences that we are aware of. This allows Suppliers greater flexibility (for example, in terms of whether to wait for the end of the objection period before appointing agents). ScottishPower has noted that they agree that a Supplier can choose when they begin the process.</p>
ScottishPower	BSCP514 6.2.4.4, 6.2.5.3	If the new MOP can send the D0170 well in advance of the CoS, surely the D0151 should be sent within 2WD of the notification from SMRS (D0058) as long as the effective to date ties in with the supplier loss date?	<p>The transfer of MTDs is not dependent on the receipt of a de-appointment flow. The MOA should act on the D0170 within 2WD of receipt. Whilst we agree that the de-appointment timescales could have been shortened to 2WD, this was not included in the Proposer's CP.</p>



Comments on the Proposed Redlining			
Organisation	Document Name and Location	Comment	ELEXON's Response
ScottishPower	BSCP514 6.2.4.5, 6.2.5.5	If all other timescales are coming in the notification to the MAP should come in as well	CP1405 only seeks to shorten the timescales for the agent appointment and data transfer steps as these are on the critical path for a timely CoS process. We agree that the Meter Asset Provider (MAP) needs information from the NHHMOA about the CoS. But the timescales for providing data to the MAP do not impact on the speed of the customer-impacting processes.
ScottishPower	BSCP514 6.2.4.6, 6.2.5.6	Should be 5WD to tie in with rejecting appointment	The timescales within these two steps are already set to be within 5WD, so we do not believe any change is required.
ScottishPower	BSCP514 6.2.4.8	Reference should be to 6.2.4.7 not 6 as need the D0148 detailing old MOP	We agree that this reference is incorrect, and so will amend it accordingly.
IMServ Europe Ltd	BSCP514 6.2.4.9	There are several "Error! Bookmark not defined." errors here	These errors are due to the corresponding footers not being included in the redlined extract, and will be resolved in the final version.
IMServ Europe Ltd	BSCP514 6.2.5.8	There is a "Error! Bookmark not defined." error here	This error is due to the corresponding footers not being included in the redlined extract, and will be resolved in the final version.