P302 'Improving the Change of Supplier Meter read process for smart Meters'

This Report Phase Consultation was issued on 13 March 2015, with responses invited by 7 April 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Opus Energy Ltd	3/0	Supplier
Spark Energy Supply Limited	1/0	Supplier
E.ON Energy Solutions	5/0	Supplier
TMA Data Management Ltd	0/6	HHDA, HHDC, NHHDA, NHHDC
Haven Power Ltd	2/0	Supplier
Electricity North West Ltd	1/0	Distributor
SSE Energy Supply Ltd	4/10	Supplier, Supplier Agent
Siemens Operational Services	0/6	NHHDC, NHHMOA
RWE Npower	7/15	Generator, Supplier, Supplier Agent
EDF Energy	4/9	Supplier, Supplier Agent
ScottishPower	2/6	Supplier, NHHDA, NHHDC, NHHMOA
British Gas	5/0	Supplier

Question 1: Do you agree with the Panel's initial unanimous recommendation that P302 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
11	1		

Responses

Respondent	Response	Rationale
Opus Energy Ltd	Yes	However, we do not agree with the proposed use of what was effectively the alternative solution in the original P302 consultation (with a few amendments). Our preference is to use the proposed solution as set out in the original P302 consultation, under which on a CoS event, the Old Supplier would take a final closing reading by obtaining a reading(s) from the smart Meter's 'Daily Read Log' on SSD and then send the total cumulative readings to the Old NHHDC for validation. Similarly, the New Supplier would take an opening reading, thereby utilising the smart functionality available. We do not support the solution which is now proposed, whereby the New Supplier would be responsible for retrieving the midnight readings from the daily log and passing these to the Old Supplier. This is because Old and New Suppliers will have priority actions for their element of the process which could potentially result in a delay of transfer of information to the other supplier, for which there is no contractual relationship and therefore no incentive to relay the information in a timely manner. Even with proposed timescales for this activity, it appears likely that the read process would be swifter and more robust if both the New and Old suppliers are directly incentivised to gain timely opening and closing CoS reads respectively. If both suppliers were to utilise the smart functionality available in this way, each supplier would be better able to track their progress and take responsibility for their performance against the smarter billing objectives proposed by Ofgem for the benefit of the customer. However, with the solution now proposed, if there is a delay in the Old Supplier receiving their closing CoS reading there could be a

Respondent	Response	Rationale
		delay in issuing the final bill and ultimately a delay in issuing any final credit due to the customer. To support these concerns, we have liaised with one of our internal teams which, as part of their role, carry out internal analysis of the typical timescales to receive D0086s. This analysis (using sample data from 2013 and 2014) showed that just 68.41% of D0086s had been received within 14 calendar days and some 7.52% of D0086s had not been received after 2 months.
Spark Energy Supply Limited	Yes	-
E.ON Energy Solutions	No	No. The solution that has been developed by the working group and recommended is not optimal for suppliers, agent parties and most importantly our customers, for an enduring smart metered industry. We are firmly of the view that implementing this change now, while the DCC solution is still being baselined, will result in further changes and re work. This will add further cost to customer bills at exactly the time when our customers are expecting to see a reduction, through the benefits of improved processes resulting from smart meters. This risks introducing confusion and further mis-trust in the industry which could have detrimental impacts to the overall success of the smart metering programme. We agree processes will need to change, but believe it would be a much better use of resources, to develop a truly smart change of supplier process once a better understanding and practical experience of the DCC systems has been gained. The proposed solution still has parties being dependent on one another to exchange and send data to ensure opening and closing readings are confirmed and that settlement integrity is maintained. This is contrary to Ofgem aspirations of their open letter 06.12.14 that states "Where possible, a party should not be reliant on competitors for the data it requires to meet its own and its customer's needs" and as such we believe the proposed solution is an opportunity missed.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	P302 better facilitate BSC Objective d by improving the efficiency of the COS process for Smart Metering.
Haven Power Ltd	Yes	Objective A,B,E,F – Neutral Objective C – YES – It would enable tariff changes to coincide with change of supply with minimal impact to the customer and supply, and direct ownership of the change of supplier process. Objective D – YES – The vast majority of changes of supplier readings should be actual reads, which will reduce settlement impact. The process should be less manual, resulting in accurate and timely D19s
Electricity North West Ltd	Yes	As P302 will reduce the time it takes to complete the CoS process it should better facilitate Applicable BSC Objectives (c) and (d).
SSE Energy Supply Ltd	Yes	SSE can see that the process as set out does provide the most efficient new process to manage remotely accessed Smart CoS Readings from DCC Serviced Meters. Further facilitating BSC Objective (d).
Siemens Operational Services	Yes	P302 will support BSC Objective d) - Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
RWE Npower	Yes	We agree with the Panel's recommendation that P302 should be approved as we believe it better facilitates BSC Objective D - promoting efficiency in the implementation and administration of the balancing and settlement arrangements. We would however, like to make it clear that we feel the solution that has been recommended by industry, the working group and the BSC Panel is not necessarily the most optimal solution as we believe a more optimal solution could have been developed had the DCC been willing to engage with the working group.
EDF Energy	Yes	We agree with the Panel's initial recommendation that P302 should be approved as it better facilitates Applicable BSC Objective (d). We believe that the current Change of Supplier Meter read process would not be fit for purpose for smart meters enrolled for communication using the Data Communications Company (DCC), and without P302 these meters would be subject to a higher level of data exceptions than existing meters under existing processes.

Respondent	Response	Rationale
		We agree that the proposed processes will make better use of the enhanced functionality that smart Meters will provide, and that the changes will reduce the amount of data transfer required between NHHDCs, which will improve the efficiency of the process as well as the timeliness and accuracy of the data being used in Settlement for smart meters.
ScottishPower	Yes	Scottish Power agrees with the Panel's opinion that P302 will better facilitate BSC Objective (d).
British Gas	Yes	Yes, we agree with the panel's recommendation that P302 should be approved. We agree with the proposer in that the changes as proposed under P302 better facilitates the BSC Objective (d) in ensuring that the CoS process leverages the enhanced capability provided by DCC serviced Smart Meters and will ultimately simplify the process through a reduction in data hand-offs between suppliers and supplier agents, which will therefore lead to a more efficient and timely CoS process with improved accuracy of reads used within billing and settlement processes.

Question 2: Do you agree with the Panel that the redlined changes to the BSC and CSDs deliver the intention of P302?

Summary

Yes	No	Neutral/No Comment	Other
9	1	1	1

Responses

Respondent	Response	Rationale
Opus Energy Ltd	-	-
Spark Energy Supply Limited	Yes	-
E.ON Energy Solutions	Other	Whilst the redlined changes describe the necessary changes for the proposal we remain of the view that the proposed change is not optimal and will require further amendment.
TMA Data Management Ltd	Yes	
Haven Power Ltd	Yes	They give a clear definition of flows involved in the change of supplier process and changes required.
Electricity North West Ltd	Yes	We believe the redlined changes will deliver the intention of P302, but would ask where both Suppliers agree to use the DCC process for non-DCC registered MPANS (BSCP504, footnote 3) how would the LDSO know to expect two D0086's instead of one? Also, In BSCP504 for DCC services SVA NHH Metering Systems within step 3.2.6.55; 3.2.6.56 needs to be replaced with 3.2.6.54.
SSE Energy Supply Ltd	Yes	SSE agrees the drafting as set out does deliver the intent of P302.
Siemens Operational Services	Yes	-
RWE Npower	No	We believe errors exist in the published wording. Details: BSCP504 - Footnote 25 needs clarifying as it currently appears as though the meter reading is sent on a D0150 to NHHDC. We suggest the wording is

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		updated to: 'If SSD midnight register reading(s) retrieved, the Old Supplier will send the New Supplier the Total Cumulative and any active Time of Use Settlement Register reads from the Daily Read Log. The old Supplier will send the NHHDC the reads for the meter register IDs based on the D0150 Meter Configuration. In both cases the "Reading Type" will be flagged as "R – Routine" - 3.2.6.44 – Irrespective of whether there has been a change to the settlement configuration this reading should be sent to the old Supplier and new NHHDC as read type 'I'. - 3.2.6.44 – as the D0010 sent from new Supplier to old Supplier will contain all 48 register readings there are formatting questions on the D0010 as to which register IDs are used for the remaining non configured registers. - 3.2.6.42 – clarification is required around the last statement: 'If the new Supplier is unable to configure the Meter until after SSD+5 WD, the new Supplier will use the change of SSC process in 3.3.6 and will adopt the old Supplier's SSC for the intervening period' It was our understanding that in this scenario, the traditional CoS process would be triggered. BSCP514 - 6.2.4.14 – 'Send revised MTD' suggests MTD have been sent previously and an updated set of MTD is being provided. We would like this changed to: 'Send MTD'.
EDF Energy	Yes	We agree that the redlined changes to the BSC and CSDs deliver the intention of P302 and set out accurately the steps required by all parties to successfully complete the Change of Supplier Meter read process for smart meters. While the obligations on parties are made clear in the redlining, given the complexity of the changes and the reliance of these processes on an understanding of smart metering we recommend that Ofgem/Elexon consider creating and issuing guidance documentation to ensure that all Suppliers and Agents fully understand and are able to comply

Respondent	Response	Rationale
		with their obligations for smart meters.
ScottishPower	Yes	Please see our response to question 4.
British Gas	Yes	We agree that the redlined changes deliver the intention of P302.

Question 3: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
9	3	0	0

Responses

Respondent	Response	Rationale
Opus Energy Ltd	Yes	A minimum 12 months lead time is required, which could be accommodated with the revised recommendation of 30 June 2016 as part of the June 2016 BSC Release.
Spark Energy Supply Limited	Yes	-
E.ON Energy Solutions	No	No, on the basis that the process recommended is not a unanimous decision of the working group and will require further changes to be developed into a truly smart process, fit to support smart metered customers.
TMA Data Management Ltd	Yes	We agree with a planned implementation date of June 2016 if an Authority decision is received on or before 29/06/2015 as it provides a 12 months lead time to parties.
Haven Power Ltd	No	Independent suppliers are already working against a challenging timetable to implement system changes required for smart metering infrastructure as well as gearing up for mass roll out. In addition there is a huge amount of work required to implement supplier obligations from EMR and mandatory HH settlement for PC 5-8 customers. We cannot envisage being able to accommodate such a significant change within the timeframe proposed.
Electricity North West Ltd	Yes	The 30 June 2016 provides a reasonable lead time for the implementation of the consequential system changes of this modification.
SSE Energy Supply Ltd	Yes	SSE understands the need to implement this new Smart CoS read process in time for the DCC Serviced Meters. We agree it would not be appropriate to try and settle the new SMETS meters, now capable of utilising 48 Time of Use Registers and 1 Cumulative Read Register, against the existing settlement rules.

Respondent	Response	Rationale
		Therefore whilst noting that this complex change will need a minimum of 12 months to implement this change, we understand that it is needed next year in time for the DCC start date.
Siemens Operational Services	Yes	-
RWE Npower	Yes	In principal we agree with the recommended Implementation Date on the understanding that the gas solution is implemented at the same time. We also require clarification around a couple of points: - How will the CoS process be managed if the DCC goes live in April 2016 and this CP doesn't take effect until June 2016? What will happen during this interim two month period, albeit for minimal volumes? - Will the recommended Implementation Date be reviewed in the event of significant slippage of the DCC Implementation Date?
EDF Energy	Yes	We agree with the proposed implementation date of June 2016, as we would require a lead time of 12 months from approval to be able to implement the system and process changes required by P302. We note that the DCC 'go live' date has recently been announced as being April 2016; however, the current planning assumption is August 2016. It is not clear whether this means that any smart meters will be enrolled in DCC services before P302 comes into effect or not. We understand that Elexon are considering whether an interim manual process may be required for any period between DCC go-live and June 2016; the need for such a process should be reviewed regularly as the actual date that meters start to be enrolled in the DCC becomes clearer.
ScottishPower	No	The implementation date should be aligned with the delivery of the DCC and the industry change to add the Meter Serial Number to the DCC inventory described below.
British Gas	Yes	We agree with the proposed June 2016 implementation date providing Authority Consent is received with sufficient time to afford a minimum of 12 months to complete all implementation related activities.

Question 4: Do you have any further comments on P302?

Summary

Yes	No
7	5

Responses

Respondent	Response	Rationale
Opus Energy Ltd	No	-
Spark Energy Supply Limited	No	-
E.ON Energy Solutions	No	-
TMA Data Management Ltd	No	-
Haven Power Ltd	Yes	Could the D0036 flow be used to transfer consumption data (48 time of use register readings) between suppliers? Would a supplier revert to the legacy process if the old supplier opts out of following P302 process?
Electricity North West Ltd	Yes	As an LDSO we will be receiving the same dataflow (D0086) from different Market Participants, consequently we will need to implement system/process changes to accommodate this change. As mentioned in our previous response, we believe an LDSO only needs to receive the opening D0086 from the new Supplier.
SSE Energy Supply Ltd	Yes	SSE would like to take the opportunity to note that we are concerned about the use of the old Suppliers configuration for Settlements, where communications via the DCC do not work and the existing process is invoked. Utilising tariff configurations, with all its associated Meter Technical Details, which SSE does not have a Tariff to support is a concept we are troubled by. SSE is not happy with the billing implications this presents.
Siemens Operational Services	Yes	Will the implementation date for P302 be subject to change following the Replan of the DCC go-live, which has now authorised to be in April 2016? Any Industry Change Proposals which are required to support the implementation of P302 must be rapidly progressed and approved following the

Respondent	Response	Rationale
		approval of P302. This is to allow the maximum time possible for any systems and process changes to be made and be ready for implementation by the suggested June 2016 date for P302.
RWE Npower	Yes	We would like to reiterate our previous comments: - We believe that had the DCC have been included in the discussions then alternative, more optimal solutions / proposals may have been identified. - There are currently no Performance Assurance Techniques that monitor the transfer of data from the old and new Suppliers which the proposed solution is dependent on. Whilst understanding this will be picked up by the Performance Assurance Board, we feel this should be addressed at this stage to ensure there is sufficient time to develop and implement the necessary changes to the existing techniques. - In the existing traditional CoS process, the NHHDC agents are held accountable for ensuring the CoS process works smoothly and this is monitored through several Performance Assurance Techniques, e.g. BSC audit, Qualification and PARMS. There are no corresponding techniques to monitor the new obligations placed on Suppliers to ensure that the CoS event happens in a timely and accurate manner. - There is a general risk to Settlement as Suppliers and their Agents will be running two separate and very distinct CoS processes at the same time (traditional and smart). This risk is amplified because of the ability to move between the smart and traditional process. - There is a general risk to Settlement that a brand new CoS process involving large scale change for Suppliers and their Agents must be managed at the same time as the roll out of Smart meters. It is unlikely this processes will be perfect upon first implementation. As discussed in the working group, it should be expected that further change will be needed to the CoS process as it is embedded and further improvements are identified. This could be compounded if the DCC SLAs are not met with Suppliers absorbing the fall out. - We feel that the Erroneous Transfer scenario poses a risk to Settlement. BSCP504 section 4.4.3

Respondent	Response	Rationale
		and MAP10 should be reviewed by the working group (and a corresponding MRA working group) to ensure no further changes are needed in this area. - We feel that the Supplier Agreed Reads scenario poses a risk to Settlement. MAP08 should be reviewed by an MRA working group to ensure no further changes are needed in this area. - The Performance Assurance Board (PAB) should be engaged as early as possible. The PAB can review the proposed process changes and make recommendations on how the Performance Assurance Framework should be amended to ensure it remains fit for purpose following fundamental changes to the CoS process. This review should include, but not be limited to, PARMS Serials and the BSC Audit. The proposed solution developed by the P302 working group make fundamental changes to the way the CoS process operates within the BSC, we feel early engagement of the PAB is key to ensuring any approved implementation date can be met. Consideration should be given to the fact that for a period of time, two CoS processes will be operating concurrently and will need to be assured by the Performance Assurance Framework. Delaying engagement of the PAB until Authority approval (if approved) of P302 creates a risk that the necessary changes to the Performance Assurance Framework cannot be implemented in line with the go-live date of P302 or that the correct governance processes are not followed due to timing constraints. - We would like to understand whether there will be an agreed process for translation of the XML data? This needs to be considered due to concerns regarding how to map registers into D0010 format in a standardised way, using the XML data received from the DCC. This is needed to give assurance to the old Supplier that the registers on the D0010 received from the new Supplier are identifiable against the configuration they held. - P302 is not the only change required - MRA changes are required to support P302. The Authority need to be cognizant that these changes will be developed, assessed and voted on during the implementation period for P302. As such, this implementation period needs to be sufficient to ensure those changes can be made following the

Respondent	Response	Rationale
		appropriate industry governance. - As mentioned in our response to earlier questions, we feel engagement of the PAB at this stage is essential. Not only would it allow the PAB to start developing necessary changes to the Performance Assurance Framework, it would also give them the opportunity to highlight any potential constraints that may materialise should parties deem that the proposed solution is significant enough to require re-qualification. Whilst understanding that parties 'self-assess' the need to re-qualify, the scale and significance of the proposed solution could see numerous parties submitting re-qualification applications at the same time. This would impact the implementation date as it would add a significant lead time to the implementation process for parties.
EDF Energy	Yes	Given the complexity of the changes proposed by P302 and the need to ensure accurate and effective communication between Suppliers, we believe it would be prudent for Suppliers (and their Agents) to ensure that the proposed processes are thoroughly tested. If possible this should be done through co-operative testing between Suppliers that enables the full end to end Change of Supplier process for a smart meter to be tested. Suppliers should consider undertaking this sort of co-operative testing as part of the DCC's End to End test phase.
ScottishPower	Yes	**Which readings should be retrieved from the smart meter at the point of configuration?** Page 8 of the main P0302 document suggests that the new supplier should "take instantaneous readings from the smart Meter's 'Daily Read Log'". The daily read log holds a snapshot of the register readings at midnight UTC, rather than at the point when the new supplier's configuration is applied. BSCP504 suggests that the "SSD midnight register reading(s)" should be used (3.2.6.42) Is the expectation that the supplier should use the midnight readings from the meter's daily read log on SSD, the midnight reading on the date the supplier's configuration settings were applied (SSD to SSD+5), or collect readings from the meter at the moment when their configuration settings are applied (as an instantaneous request or by reading the change of tariff data billing log)?

Respondent	Response	Rationale
		Population of the D0367 with the Meter Serial Number In order to populate the D0367, the new supplier must identify the Meter Serial Number for the gained meter. This cannot be done using the MOP provided meter technical details (as these details are only issued after the D0367 is received) so suppliers must source the Meter Serial Number from another source (e.g. the D0311, ECOES data, or the DCC inventory). The ability of the DCC to provide the MSN is dependent on an Energy UK raised "Energy UK Request for Inclusion of Meter Serial Number in DCC Inventory" that was submitted to DECC on 7 April 2015 but has not yet been approved. **Visibility of the reversion from a smart CoS process to a non-smart CoS process – Old Supplier and Old NHHDC** P0302 allows the new supplier to notify their agents when to revert from a smart CoS process to the legacy non-smart process. This information is not passed to the old supplier or their agents. The old NHHDC may be able to infer that the process has reverted to dumb if they receive a D0170 from the new NHHDC (so they can expect a validated D0086 from the new NHHDC rather than an un-validated D0010 from the supplier), however the first indication the old supplier will receive that the process has reverted from smart to dumb may be when the D0086 is received with an estimated reading). **Supplier reading checks** The main proposal document references checks the gaining and losing supplier should perform using the register readings they have respectively collected. This does not appear in the redlined version of BSCP504. How will these checks be documented once P0302 is implemented?
British Gas	No	-