

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

▶ 03 Assessment Procedure

04 Report Phase

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

This Modification proposes to amend the change of Supplier process to make use of the enhanced functionality that smart Meters will provide.

The Modification takes forward the discussions and suggested way forward considered under Issue 53.

This second Assessment Procedure Consultation for P302 closes:

5pm on 6 February 2015

The Workgroup may not be able to consider late responses.



The P302 Workgroup initially recommends **approval** of the P302 Alternative Modification and **rejection** of the P302 Proposed Modification

This Modification is expected to impact:

- Suppliers
- Non Half Hourly Data Collectors (NHHDCs)
- Non Half Hourly Meter Operator Agents (NHHMOAs)
- Distribution System Operators (DSOs)



Any questions?

Contact:

Simon Fox



simon.fox@elexon.co.uk



020 7380 4299

Contents

| | | |
|----------|--|-----------|
| 1 | Summary | 3 |
| 2 | Why Change? | 4 |
| 3 | Solution | 8 |
| 4 | Impacts & Costs | 15 |
| 5 | Implementation | 17 |
| 6 | Workgroup's Discussions | 18 |
| 7 | Workgroup's Initial Conclusions | 27 |
| | Appendix 1: Workgroup Details | 29 |
| | Appendix 2: Glossary & References | 31 |

About This Document

The purpose of this second P302 Assessment Procedure Consultation is to invite BSC Parties and other interested parties to provide their views on the merits or otherwise of P302. The P302 Workgroup will then discuss the consultation responses, before making a recommendation to the BSC Panel at its meeting on 12 March 2015 on whether or not to approve P302.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits/drawbacks and proposed implementation approach. It also summarises the Workgroup's key views on the areas set by the Panel in its Terms of Reference, and contains details of the Workgroup's membership and full Terms of Reference.
- Attachment A contains the draft redlined changes to the BSC for P302.
- Attachment B contains the draft BSC Procedure (BSCP) 504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' changes for both the P302 Proposed Modification and P302 Alternative Modification.
- Attachment C contains the draft BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' changes for both the P302 Proposed Modification and P302 Alternative Modification.
- Attachment D contains the specific questions on which the Workgroup seeks your views. Please use this form to provide your response to these questions and to record any further views or comments you wish the Workgroup to consider.

P302
Second Assessment
Procedure Consultation

16 January 2015

Version 1.0

Page 2 of 33

© ELEXON Limited 2015

Why Change?

A Modification is required to put in place the necessary BSC and BSCP changes to support the change of Supply (CoS) read process for a Data and Communications Company (DCC) serviced smart Metering System. It also seeks to reduce the dependencies between the two Supplier hubs involved in a CoS event.

Proposed solution

P302 proposes to amend the CoS process to make use of the enhanced functionality that DCC serviced smart Meters will provide and improve the passing of timely and accurate consumption data into Settlement.

The proposed solution will require both the old and new Supplier to collect total cumulative and time of use Meter register readings via the DCC, and where this is not possible it sets out the timescales and processes for initiating the legacy (i.e. non-smart) CoS process.

Alternative solution

Under the alternative solution, the new Supplier would collect the Meter register readings and pass these to the Old Supplier, but is otherwise the same as the proposed solution.

Impacts & Costs

P302 will impact **all Suppliers, Non Half Hourly (NHH) Data Collectors (NHHDCs)** and **NHH Meter Operator Agents (NHHMOAs)**, who will need to amend systems and processes associated with the CoS process. It may also impact **Distribution System Operators (DSOs)**, depending upon whether the new or old NHHDCs, or both send the D0086 'Notification of Change of Supplier Readings' data flow to them.

Implementation

The Workgroup recommends an Implementation Date for P302 of:

- **30 June 2016** as part of the June 2016 Release, if an Authority decision is received on or before 29 June 2015.

This is to allow participants at least 12 months lead time to implement the changes to their systems and processes.

Recommendation

The P302 Workgroup unanimously believes that both the P302 Proposed Modification and P302 Alternative Modification would better facilitate Applicable BSC Objective (d) and a minority (two of six) also believes that the Proposed Modification and Alternative Modification would better facilitate Applicable BSC Objective (c). However, the majority of the Workgroup believes that the P302 Proposed Modification, while beneficial, is weaker on Applicable BSC Objective (d) than the Alternative Modification. The Workgroup, therefore, initially recommends that the **Alternative Modification be approved**.

What is the change of Supplier process?

In order to establish the respective Settlement and customer billing liabilities on a CoS, Meter readings must be obtained on (or close to) the date and time when the new Supplier takes over responsibility for the customer's electricity supply.

The old Supplier needs a final read(s) from which they will close the account and provide a final bill to the customer for energy consumption, up to the point that the electricity supply switches to the new Supplier. An opening read(s) by the customer's chosen new Supplier is used as a starting point for electricity consumption going forward. Unless there is a change of Meter concurrent with the CoS, the opening and closing reads should be the same.

From a BSC perspective these CoS Meter reads are used in Settlement to ensure that metered import or export for NHH Metering Systems is allocated accurately to the respective Suppliers.

What is the current process?

Under the current NHH CoS process, the NHHDC appointed by the new Supplier is responsible for determining the CoS reading for the Supply Start Date¹ (SSD) on behalf of both the new and old Suppliers.

In the situation where the new Supplier's NHHDC and NHHMOA are different to those appointed by the old Supplier, the old NHHMOA transfers the Meter Technical Details (MTD) to the new NHHDC via the new NHHMOA. This transfer of MTDs is required so the new NHHDC can interpret the Meter readings obtained from a customer's Meter correctly.

The old NHHDC transfers a Meter reading and Estimated Annual Consumption (EAC) to the new NHHDC to allow the new NHHDC to validate the CoS readings. The provision of this information by the old NHHDC also enables the new NHHDC to deem a reading in the event that valid actual readings are unavailable and to provide the EAC to the new NHH Data Aggregator (NHHDA) for use until the first Annualised Advance (AA) has been calculated.

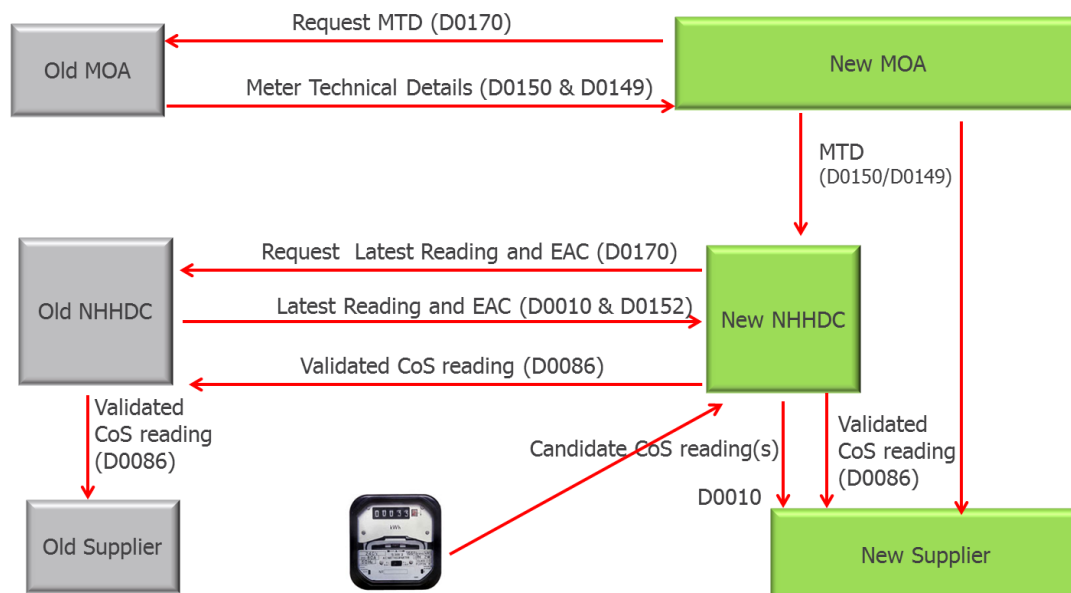
The transfer of MTDs, EACs and Meter readings between the old and new Supplier Agents is dependent on:

- the new Supplier appointing new Supplier Agents;
- the new agents being notified of each other's identities and of the relevant old agents' identities by the new Supplier; and
- the relevant data flow requests being sent.

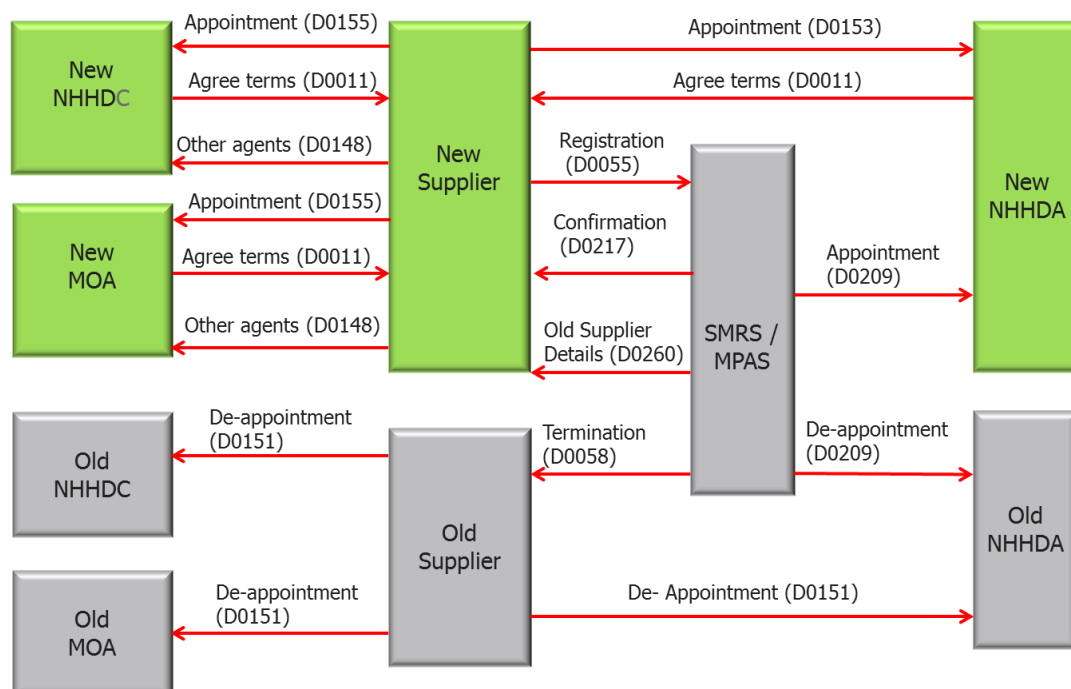
The following two diagrams summarise the current CoS process and the agent appointment and de-appointment processes. The current CoS read process has direct links and dependencies on the agent appointment process.

¹ A new SSD is the point at which a new Supplier starts providing electricity to a customer. This commences at midnight on the day that the Supplier starts providing electricity to that customer. Currently the CoS read used on SSD is derived from candidate reads taken between SSD \pm 5 Working Days (WDs). Once the CoS reading is confirmed this is then dated as the read on the SSD.

Current CoS process²



Supplier Agent appointment/de-appointment process



A list of the data flows referenced in these diagrams can be found in Appendix 2.

The current CoS reading process is complicated and is dependent on multiple data flows. As a result, the current process is lengthy and prone to error in the instances when these data flows are not sent or cannot be processed by the recipient. Delays and failures in the process can result in inaccurate data, impacting both Settlement and customer billing. The costs of resolving these delays and failures are borne by Suppliers, agents and ultimately customers.

² Please note that the CoS process diagram shows a simplified version of the process in its current form. Approved CP1395 'Distribution of Configuration Details for Smart Meters' will modify this process when it takes effect on 26 February 2015 as part of the February 2015 Release. The changes will take into account the presence of the DCC, and if a customer has a smart DCC serviced smart Meter the Supplier will obtain a CoS read rather than the new NHHDC. This will be achieved by sending a request to the smart Meter via the DCC.

Previous work on a smart CoS read process

In July 2012, Ofgem set out its intention to improve the CoS process by making use of the benefits that smart Meters will provide. Ofgem's ambition is for a fast, reliable and cost-effective process that facilitates Supplier competition and builds customer confidence. Simultaneously, it is important that any reforms maintain or improve the accuracy of Settlement.

Smart Meters are already being rolled out to homes and small businesses, with the large scale roll-out planned to begin in October 2016. The current expectation is that the smart Meter roll-out will be completed by 2020.

To support the 'smart' functionality of these Meters, the DCC has been created. The DCC has responsibility for enabling Suppliers to communicate with smart Meters in homes and small businesses. The DCC should make it easier for Suppliers to access Meter reads remotely and more quickly. This in turn should aid the accuracy of Settlement, as more actual Meter readings will be available. In addition, the customer experience should improve as readings needed on instances such as a CoS will be more readily available. Such improvements would only be fully realised if amendments were made to the existing CoS processes to make use of the functionality of smart Meters and the DCC.

With the advent of the DCC, the new Supplier will retrieve the CoS reading from the smart Meter via the DCC and pass it to the new NHHDC for validation. In order to process the closing reading on behalf of the old Supplier (i.e. under the current CoS process), the new Supplier will need to request the old Supplier's configuration from the Meter via the DCC or via the old Supplier's MOA, in addition to (optionally) downloading its own configuration to the Meter. The new Supplier may need final reading(s) for the old configuration and initial reading(s) for the new configuration. In order to validate the final and initial readings, the new NHHDC will need both the old and new configurations. The CoS process for smart Meters could therefore be more complicated than for traditional Meters, given the ease with which the new Supplier will be able to reconfigure the smart Meter on the CoS date (e.g. to support a new tariff). This complexity will not be limited to changes of Standard Settlement Configuration (SSC). The new Supplier will reconfigure the smart Meter on CoS (including the tariff rates associated with each of the time of use registers). Even if the new Supplier adopts the same SSC as the old Supplier, the new Supplier may map the physical registers on the Meter to the same Settlement Registers as the old Supplier.

Ofgem and the CoS Expert Group

Ofgem has been engaging with a range of industry participants and undertaken research into making use of smart metering to improve the CoS processes and the customer experience. Part of this has been achieved through discussions at the Change of Supplier Expert Group (COSEG) and supporting sub-groups.

On 6 December 2013 Ofgem issued an [open letter](#)³ welcoming a participant to raise a BSC Issue, to consider what changes should be made to the process by which CoS Meter reads are obtained and processed for smart electricity Meters. Part of this Issue would be consideration of the reform proposals developed at the Ofgem led COSEG meetings.

³ 'Open letter on reforming the change of supplier (CoS) Meter read process for smart electricity Meters'

Issue 53

On 9 December 2013, EDF Energy raised [Issue 53 'Reforming the Change of Supplier Meter read process for smart electricity Meters'](#).

The Issue 53 Group considered the high level solution, discussed at the Ofgem COSEG meetings and expanded on the detail of the solution. The Issue 53 report covering full details and outcomes of the Issue 53 Group discussions was provided to the BSC Panel on 20 March 2014 and is published on the [Issue 53 webpage](#).

What is the issue?

One of the conclusions of the Issue 53 discussions was that a Modification was required to put in place the necessary BSC and BSCP changes to support a DCC serviced smart Meter CoS read process. This Modification has been raised to progress these changes and seeks to reduce the dependencies between the two Supplier hubs involved in a CoS event.

Proposed solution

The proposed solution seeks to take forward the DCC service smart Meter CoS process discussed under Issue 53. The proposed solution will apply to smart Meters that are serviced by the DCC, but may also, by agreement of the two Suppliers, be used for Smart Metering Equipment Technical Specifications (SMETSs) compliant Meters that are not serviced by the DCC.

What is the process?

On a CoS event the old Supplier will take final readings from the smart Meter's 'Daily Read Log' on the SSD. These readings will consist of a total cumulative reading and readings from each of the 48 time of use registers, as recorded at midnight Coordinated Universal Time (UTC). The old Supplier will perform a preliminary check against its reading history to ensure that the correct Meter has been read and ensure that the reading(s) on the Settlement Registers are appropriate for billing and Settlement. The old Supplier will then send the Settlement Register readings to its NHHDC (the old NHHDC) for validation.

The old Supplier will send the total cumulative reading and any Settlement Register readings to the new Supplier using the D0311 'Notification of Old Supplier Information' data flow. This will allow the new Supplier to perform a consistency check with its own readings (if actual readings are obtained from the smart Meter) or to pass to the new NHHDC in the event that the non-smart process is invoked as a result of a communications failure. If the old Supplier is unable to obtain readings from the smart Meter, the D0311 data flow to the new Supplier will include an estimated CoS reading.

It is envisaged that the old Supplier will be able to obtain the closing reading on the SSD in all but rare circumstances (for example if a communications failure coincides with the CoS event). Otherwise the old Supplier will be able to obtain the SSD readings from the Daily Read Log for up to 31 calendar days after the CoS event, before the entry in the rolling log is overwritten.

The new Supplier will also take the total cumulative register reading, as recorded at midnight UTC in the 'Daily Read Log'. It will then take an instantaneous total cumulative register reading and an opening reading for each of the time of use registers it will be using, at the point of re-configuring the Meter. It is assumed that this will be close to midnight on SSD, though this may not always be possible. To ensure that all units between midnight UTC and any re-configuration of the Meter are accounted for in Settlement, the new Supplier will calculate the difference between the total cumulative reading recorded at midnight UTC and the instantaneous value retrieved at the time of re-configuration. The new Supplier will then adjust the time of use register readings to account for the unallocated units.

The new Supplier will check its reading(s) against the D0311 data flow from the old Supplier (normally expected to be sent on SSD/SSD+1 Working Day (WD), and by SSD+3 WD at the latest) to ensure that the customer is not under or overbilled and data entering Settlement is correct. Where the reads do not match, the new Supplier will raise a dispute in accordance with Master Registration Agreement (MRA) Agreed Procedure ([MAP](#)) 08 'The Procedure for Agreement of Change of Supplier Readings and Resolution of Disputed Change of Supplier Readings' within 1 WD of receipt of the old Supplier's readings. Where



What is a 'Daily Read Log'?

A SMETS 2 smart Meter is required to maintain a Daily Read Log – a 31 day rolling record of midnight UTC readings from various registers. These registers include the total cumulative register and each of the 48 time of use registers.



What is the 'total cumulative register'?

This is the record of total consumption over time, since the Meter was first installed. It is similar to the consumption measured on a 'dumb' single rate Meter.



What are 'time of use registers'?

A SMETS 2 smart Meter has 48 time of use registers, which can be used by a Supplier to measure consumption at different points during the day. This enables the Supplier to then apply consumption to the tariff agreed between the Supplier and customer.

P302

Second Assessment
Procedure Consultation

16 January 2015

Version 1.0

Page 8 of 33

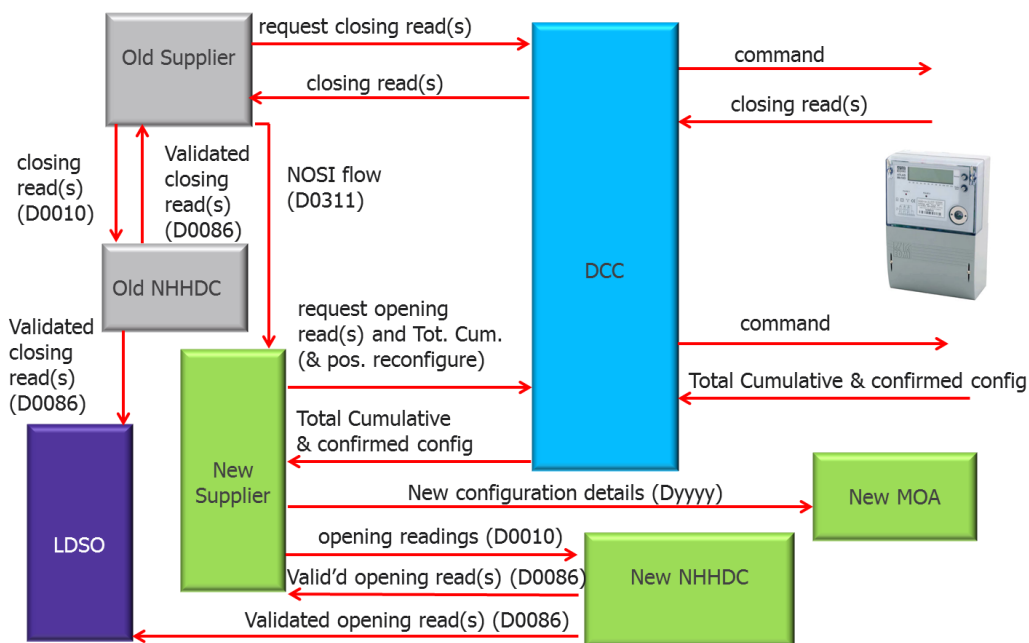
© ELEXON Limited 2015

the new Supplier has not received the D0311 data flow with reads, the new Supplier will contact the old Supplier.

As opening readings from the smart Meter are likely to be accurate in all but exceptional circumstances (e.g. Meter malfunction), the new NHHDC will not need to validate them against the reading history and latest EAC from the old NHHDC. This will remove a dependency that can cause delays to the CoS process.

The new NHHDC will use a class average EAC from the new Supplier rather than the latest calculated EAC from the old NHHDC. However, any loss of accuracy will be short-lived, given the improved prospects of replacing the EAC with an AA in shorter timescales with smart metering.

The DCC serviced smart Meter CoS process can be summarised by the following diagram:



Alternative solution

The alternative solution is that, rather than have both old and new Suppliers take readings independently, the new Supplier will be responsible for retrieving the readings and passing these to the old Supplier.

The new Supplier will take instantaneous readings at the time of reconfiguring the smart Meter (as in the proposed solution). These readings will include the total cumulative register readings and all 48 time of use register readings. All readings will be passed to the old Supplier. The old Supplier will only send the old NHHDC the readings associated with the Metering System's SSC and Time Pattern Regimes (TPRs). The new Supplier will also send the new NHHDC the readings associated with the Metering System's SSC and TPRs, which may be the same as or different from that of the old Supplier.

As both Suppliers will use reading(s) sourced by the new Supplier at a single point in time, the process for accounting for unallocated units in the proposed solution will not be required as part of the Alternative Solution.

The old Supplier may still optionally take a reading(s), which it may send to the new Supplier to enable the new Supplier to check its reading(s). Both parties will use the same reading and the old Supplier will initiate the disputed reads process if the reading received from the new Supplier is not able to be used for billing or Settlement.

Other key features of the Alternative Solution are the same as those in the Proposed Solution:

- As opening readings from the smart Meter are likely to be accurate in all but exceptional circumstances, the new NHHDC will not need to validate them against the reading history and latest EAC from the old NHHDC. This will remove a dependency that can cause delays to the CoS process.
- The new NHHDC will use a class average EAC from the new Supplier rather than the latest calculated EAC from the old NHHDC. However, any loss of accuracy will be short-lived, given the improved prospects of replacing the EAC with an AA in shorter timescales with smart metering.

Legal text

To support the proposed smart Meter CoS Read process the following changes are required. These changes are common to both the Proposed and Alternative Modifications:

- Amendment to the requirements in [Section S Annex S-2 'Supplier Volume Allocation Rules'](#), section 4.3.13 relating to the calculation of AA and EAC values, such that:
 - The old Supplier's NHHDC will only be required to send the previous EAC where requested to do so by the new Supplier's NHHDC;
 - The new Supplier will provide an initial EAC to its NHHDC, in the circumstances set out in [BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#); and
 - The new NHHDC will use the initial EAC provided by its Supplier in the event that the old NHHDC has not provided a previous EAC (typically for DCC serviced smart Meters with functioning communications).
- Amendment to [Section X Annex X-1 'Glossary'](#) to introduce the definition of DCC.

Both solutions require amendments to BSCP504 and [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) as appropriate to capture the proposed CoS read process changes.

The draft redlined changes to the BSC and Code Subsidiary Documents (CSDs) for the P302 Proposed and Alternative Modifications can be found in Attachments A, B and C.

Proposed solution

- The old and new Supplier will obtain the SSD read for their opening and closing CoS readings from the smart Meter. As the smart Meter records midnight UTC readings every day in a 31 day rolling log and both Suppliers have access to the SSD midnight reading, both Suppliers can retrieve the same CoS readings, even if they do so at different times. The reads must be passed to their respective Suppliers' NHHDCs for validation and used in the creation of AAs for Settlement purposes. The Meter readings sent to the NHHDCs will be sent on the D0010 'Meter Reading' data flow. The NHHDCs will then send the D0086 data flows to their respective Suppliers by SSD+8 WD.

- The old Supplier will send the D0311 data flow to advise the new Supplier of the total cumulative reading it has obtained and readings from any of the Settlement Registers it uses. The D0311 data flow will also include the latest EAC. To ensure that the reading sent on the D0311 data flow is the one that the old Supplier intends to use for billing and Settlement, the old Supplier will check that the reading(s) retrieved are consistent with the reading history for the Metering System.
 - If the old Supplier is unable to obtain the read, it should inform the new Supplier by sending the D0311 data flow with the EAC and an estimated reading.
 - If the new Supplier does not receive a D0311 data flow, it will contact the old Supplier in the event that the new Supplier is unable to obtain an opening reading(s) from the Meter.
 - The new Supplier should check that the midnight total cumulative register reading taken from the Meter matches that on the D0311 data flow received from the old Supplier and dispute the old Supplier's reading where it does not.
- If the new Supplier configures the smart Meter after midnight UTC on SSD, it will follow a process to account for any units consumed between the midnight UTC reading(s) and the readings taken on reconfiguration. Details of this process can be found in the BSCP504 Appendix 4.4 redlining.
 - For delays of up to SSD+5 WD, the new Supplier will re-date the SSC (and associated readings) to SSD.
 - For delays of longer than SSD+5 WD, the new Supplier will adopt the old Supplier's SSC for the intervening period.
- If the new Supplier is unable to retrieve the Meter reading(s) from the smart Meter by SSD+4 WD (for example, because of a communications failure), it will initiate the legacy CoS processes.
- The new Supplier will confirm the configuration of a smart Meter on a CoS and pass the SSC and Meter register configuration to its NHHMOA. The new NHHMOA will wait for the MTD from the old NHHMOA, update these with the SSC and register mappings from the new Supplier and then send to the new NHHDC, Supplier and DSO.
- The new Supplier will provide the NHHDC with an Initial (class average) EAC for use until such time as the NHHDC has taken a second reading and processed an AA. The new NHHDC will not be dependent on receiving the latest reading and EAC from the old NHHDC.
- The new Supplier will notify its NHHDC and NHHMOA of whether the Meter is a smart Meter and whether they need to follow the smart or non-smart CoS read process. This will be achieved using the D0155 'Notification of Meter Operator or Data Collector Appointment and Terms' data flow, which may be amended to include a new 'Smart Process Indicator' data item.
- Where the legacy CoS processes are used in the event that the new Supplier is unable to retrieve the Meter reading(s), a second D0155 data flow would be sent to request that the agents revert to the legacy CoS process.

- If the legacy process is invoked due to a communications failure, it will run to its conclusion, even if communications are restored. Any readings from the smart Meter will be input into the legacy process.

Alternative solution

- The new Supplier will obtain the SSD read from the smart Meter. The readings will be taken on configuration of the Meter, which should be carried out as soon after midnight UTC as possible. The new Supplier will pass the total cumulative reading and all 48 time of use register readings to the old Supplier. The new Supplier will send the readings on a D0010 data flow. A change to the Data Transfer Catalogue (DTC) will be needed to allow a Supplier-to-Supplier instance of the D0010 data flow.
- The old Supplier may still take an actual midnight reading(s), and may send it to the new Supplier to enable the new Supplier to check its reading(s). This will be sent on the D0311 data flow, along with the latest EAC. This process is mandated in the Proposed Solution (where the old Supplier bills on its own readings) but is optional in the Alternative Solution (where the old Supplier's readings perform a check and 'backstop' function).
- The old and new Suppliers will pass the relevant time of use register readings to their respective NHHDCs. The relevant readings will be those associated with the SSC and TPRs used by the respective Suppliers.
- The NHHDCs will separately validate the readings and send D0086 data flows to their respective Suppliers by SSD+8 WD.
- If the new Supplier configures the smart Meter after midnight UTC on SSD, any units consumed between the midnight UTC reading(s) and the readings taken on reconfiguration will effectively be billed to the old Supplier.
- For delays of up to SSD+5 WD, the new Supplier will re-date the SSC (and associated readings) to SSD. For delays of longer than SSD+5 WD, the new Supplier will adopt the old Supplier's SSC for the intervening period.
- If the new Supplier is unable to retrieve the Meter reading(s) from the smart Meter by SSD+4 WD (for example, because of a communications failure), it will initiate the legacy CoS processes.
- The new Supplier will confirm the configuration of a smart Meter on a CoS and pass the SSC and Meter register configuration to its NHHMOA. The new NHHMOA will wait for the MTD from the old NHHMOA, update these with the SSC and register mappings from the new Supplier and then send to the new NHHDC, Supplier and DSO.
- The new Supplier will provide the NHHDC with an Initial (class average) EAC for use until such time as the NHHDC has taken a second reading and processed an AA. The new NHHDC will not be dependent on receiving the latest reading and EAC from the old NHHDC.
- The new Supplier will notify its NHHDC and NHHMOA of whether the Meter is smart and whether they need to follow the smart or non-smart CoS read process. This will be achieved through the use of the D0155 data flow, which will be amended to include a new 'Smart Process Indicator' data item.

- Where the legacy CoS processes are used in the event that the new Supplier is unable to retrieve the Meter reading(s), a second D0155 data flow would be sent to request that the agents revert to the legacy CoS process.
- If the legacy process is invoked due to a communications failure, it will run to its conclusion, even if communications are restored. Any readings from the smart Meter will be input into the legacy process.

Assessment Consultation Question

Do you agree with the Workgroup that the draft BSC and CSD changes in Attachments A-C deliver the intention of P302?

Please provide your rationale.

Are the timescales set out in BSCP504 for the alternative solution, where the old NHHDC validates the read and generate the D0086 data flow, achievable?

Please provide your rationale.

Are the timescales set out in BSCP514 for both the proposed and alternative solution, where the new MOA provides the MTDs, achievable?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

Are there any other alternative solutions?

As part of the first Assessment Consultation, two other alternative solutions were proposed.

In one alternative option, the old Supplier hub would deem a CoS reading in the event of a communications failure (based on its reading history). The Workgroup explored and modelled this option, but concluded that it would either require changes to the legacy process or create three processes: for smart Meters with operational communications; smart Meters without operational communications; and non-smart Metering Systems. As the scope of P302 is limited to CoS for smart Meters, the Workgroup agreed not to develop the solution further. The Workgroup noted that this alternative option could be explored further to improve the CoS process for all types of Meters.

In the other alternative option, the NHHDC would revert to the non-smart CoS process in the absence of a CoS reading from the new Supplier (and using the D0311 data flow), rather than on an explicit notification from the Supplier.

Again the Workgroup explored and modelled this option, but noted that the NHHMOA would be unaware that the NHHDC had reverted to the legacy process, so the solution was incomplete.

In addition to this, a number of other considerations were discussed that may benefit the CoS process but that would have wider impacts than the BSC and which the Workgroup recommend exploring further. These included:

- centralised registration, which is already under consideration by Ofgem's smarter markets work;
- the potential for the DCC to actively send the CoS read to both Suppliers;
- amending the DCC system and smart Meters to operate in clock time (or amending Settlement to work in UTC);

- amending the DCC system and SMETS to allow the New Supplier to reset time of use registers to zero on CoS; and
- revisiting some aspects of rejected [Change Proposal \(CP\) 1388 'Meter Technical Details for Smart Meters'](#) to reduce the dependency of the CoS process on the transfer of MTD.

Overall, the Workgroup does not believe there are any further potential alternative solutions that would better facilitate the Applicable BSC Objectives than the two solutions already proposed.

Assessment Consultation Questions

Are there any other potential Alternative Modifications within the scope of P302, which would better facilitate the Applicable BSC Objectives?

Please provide your rationale and, if 'Yes', please provide full details of your Alternative Modification(s) and your rationale as to why it/they better facilitate the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment D.

Risks to Settlement

P302 seeks to reduce the dependences between the old and new Supplier hubs. However, it does not do this at the expense of an unacceptable risk to Settlement (or to the detriment of the customer). The P302 Workgroup would therefore like to understand whether the proposed and alternative solutions, or any potential new solution, would increase the associated risks to Settlement and whether there are any actions that could be taken to further mitigate the risk but ensure an efficient and timely CoS process.

The P302 Workgroup noted that under the proposed solution, the old Supplier is reliant on the new Supplier to identify differences between the closing readings (notified by the old Supplier on the D0311 data flow) and the opening readings taken from the smart Meter, and to raise a MAP08 dispute where there is a mismatch. The risk of overbilling (both in Settlement and customer billing) is arguably higher than under the alternative solution, in which both Suppliers are using the same reading to open and close customer bills and Settlement liabilities.

The Workgroup also noted that the old Supplier is less dependent on the new Supplier under the proposed solution than under the alternative, so from this perspective, the alternative solution may carry more Settlement (and customer billing) risk.

Assessment Consultation Questions

What are the potential risks to Settlement for the proposed solution and the alternative solution?

Please provide your rationale.

What controls do you believe should be put in place to mitigate any associated risks?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

4 Impacts & Costs

Estimated central implementation costs of P302

The estimated ELEXON effort to implement P302 equates to £240 (one man day). The ELEXON effort required is to update the relevant documents impacted by P302.

P302 impacts

Impact on BSC Parties and Party Agents

| Party/Party Agent | Impact |
|-------------------|---|
| Suppliers | Changes to the CoS Meter read process where a site has a DCC serviced smart Meter. |
| NHHDCs | |
| NHHMOAs | |
| DSOs | DSO may need to amend systems and processes to allow for the receipt of D0086 data flows from both the old and new NHHDC. |

Impact on Transmission Company

No impact.

Impact on BSCCo

No impact.

Impact on BSC Agents

No impact.

Impact on BSC Systems and process

No impact.

Impact on Code

| Code Section | Impact |
|---------------------|--|
| Section S Annex S-2 | Changes to the requirements for calculating EACs – see attachment A. |
| Section X Annex X-1 | Addition of new defined term – see attachment A. |

Impact on Code Subsidiary Documents

| CSD | Impact |
|---------|--|
| BSCP504 | Changes to capture the process steps and activities associated |

| Impact on Code Subsidiary Documents | |
|-------------------------------------|--|
| CSD | Impact |
| BSCP514 | with the DCC serviced smart Meter CoS read process – see attachment B and C, respectively. |

| Impact on Core Industry Documents and other documents | |
|---|--|
| Document | Impact |
| Master Registration Agreement (MRA) | <p>Changes will be needed to the DTC to:</p> <ul style="list-style-type: none"> • Add a new Smart Process Indicator to the D0155 data flow; • Allow total cumulative register readings to be sent using the D0311 data flow; • Mandate the use of the D0311 data flow for DCC-serviced non-domestic Metering Systems as well as domestic Metering Systems; and • (as part of the alternative solution) allow the D0010 data flow to be sent between new and old Suppliers. <p>It is anticipated, particularly under the Proposed Modification, that changes will be needed to 'The Procedure for Agreement of Change of Supplier Readings and Resolution of Disputed Change of Supplier Readings' (MAP08).</p> |

As part of this consultation, the Workgroup seeks further information from participants to help it understand these impacts and the associated costs and lead times with implementing P302.

| Assessment Consultation Questions |
|--|
| <p>Will P302 impact your organisation?</p> <p><i>If 'Yes', please provide a description of the impact(s) and any activities which you will need to undertake between the Authority's approval of P302 and the P302 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state any difference in impacts between the Workgroup's proposed solutions.</i></p> |
| <p>Will your organisation incur any costs in implementing P302?</p> <p><i>If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs. Please also state whether it makes any difference to these costs whether P302 is implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in costs between the Workgroup's proposed solutions.</i></p> |
| <p>How long (from the point of Authority approval) would you need to implement P302?</p> <p><i>Please provide an explanation of your required lead time, and which of the activities listed in your previous answers on impacts are the key drivers behind the timescale. Please also state whether it makes any difference to this lead time whether P302 is implemented as part of or outside of a normal BSC Systems Release. Where applicable, please state any difference in lead times between the Workgroup's proposed solutions.</i></p> |
| <p>The Workgroup invites you to give your views using the response form in Attachment D.</p> |

5 Implementation

Recommended Implementation Date

The Workgroup recommends an Implementation Date for P302 of **30 June 2016** as part of the June 2016 release, if an Authority decision is received on or before 29 June 2015.

The Workgroup considered the earliest Implementation Date for P302. It considered that due to the likely need for participants to make system changes, there would need to be at least 12 months lead time. This is earlier than the expected DCC go-live date, which means that interim processes won't be necessary, which a post-DCC go-live P302 Implementation Date may have required.

Assessment Consultation Question

Do you agree with the Workgroup's recommended Implementation Date?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

When will the final and opening reads be retrieved?

A Workgroup member asked whether the old and new Suppliers would obtain the Meter readings on or after midnight. The Proposer clarified that the Meter will record the reading at midnight UTC in the Daily Read Log, which both Suppliers could retrieve on SSD. The Workgroup understood that the new Supplier would only be able to access this once the DCC had updated the Meter's security credentials. However, it was later clarified that access to readings is not achieved through a 'critical command' and as such doesn't require security credentials. Instead access is permitted by the DCC according to records of registered Suppliers taken from the DCC's copy of Meter Point Administration Service (MPAS) data. The old Supplier will continue to have access to entries in the Daily Read Log which relate to its registration period. The Workgroup also noted that a SMETS 2 Meter will retain the data in the Daily Read Log for 31 days, when the rolling log is then overwritten.

How should re-configuration and Meter readings after midnight be treated?

As part of the proposed solution, the old Supplier will retrieve the closing readings from the Daily Read Log. The new Supplier will retrieve the opening readings at the time of re-configuring the Meter. The proposed solution includes a process for accounting for any units imported (or exported) between midnight UTC and the time of reconfiguration (where later). Under the alternative solution, both Suppliers will use readings retrieved on re-configuration by the new Supplier, so this additional process will not be needed.

In both the proposed and the alternative solutions, the effective date of the new Supplier's SSC (where different to that of the old Supplier's SSC) should be re-dated to the SSD in the event that the Supplier is able to reconfigure the smart Meter between SSD+1 WD and SSD+5 WD. This is in line with the current CoS process. Where the new Supplier is unable to reconfigure the smart Meter by SSD+5 WD, the old Supplier's SSC should be adopted and the change of SSC process followed. The Workgroup recognised that this approach may have impacts in terms of retaining actual dates and so should be subject to a consultation question.

Assessment Consultation Question

Do you agree that a concurrent change of SSC on CoS should be treated as having taken place on the SSD, so long as the re-configuration of the Meter was carried out no later than SSD+5 WD?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

What implications will P302 have for customer billing?

The Workgroup noted that there might also be issues for Suppliers with respect to billing. For example, if the new Supplier has agreed a new time of use tariff with the customer, but has to continue using the old Supplier's SSC due to communication issues with the smart Meter. It was recognised that issues with the customer billing experience are outside the scope of the BSC solution to this issue and that the Supplier would need to

manage its communications with the customer. The Ofgem representative queried whether the P302 proposed or alternative solution more successfully mitigates the risk of inaccurate customer billing and whether any further changes could be made to either option to further reduce discrepancies in billing. The Workgroup agreed that this question is unable to be answered under P302 as it is a Supplier-customer relationship issue, but noted Ofgem's concern to ensure accurate billing.

It also noted that the DCC Service Levels associated with the communications with smart Meters require 99.0% (minimum) to 99.9% (target) availability. Therefore, it concluded, these should be rare exceptions.

The Workgroup discussed the relative double billing risks of the proposed and alternative solutions. As these risks apply to Settlement accuracy as well as customer billing accuracy, the arguments are noted under 'Risks to Settlement' in Section 3.

In terms of the timeliness of billing, the Workgroup noted that the dependency on the new Supplier under the alternative solution could mean that closing bills would be issued later than under the proposed solution. Under the proposed solution, the closing bill could theoretically be issued as early as SSD. Under the alternative solution SSD was also theoretically possible, although one or two days later was more likely. It was noted that, even under the alternative solution, the old Supplier could bill early on the midnight reading and either write off the interim consumption up until the point of reconfiguration or send a small follow-up bill.

Whilst customer experience issues are outside the scope of the BSC, P302 has important implications in this area. Ofgem will need to understand respondent views in order to make a decision on the Modification. The supplementary question below has been included at Ofgem's request.

Supplementary Question

Which option do you consider most successfully mitigates the risks of under/over billing, delays in billing or re-billing? To what extent do these risks increase or decrease relative to the current arrangements?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

How should the new Supplier transfer readings to the old Supplier as part of the alternative solution?

The draft redlining specifies the D0010 data flow for the transfer of readings from new to old Supplier as part of the Alternative Solution. This will require a change to the DTC to allow a Supplier-to-Supplier instance of the D0010 data flow. It will also need a convention for transferring the total cumulative register reading, along with all 48 of the time of use register readings. The Workgroup agreed that the consultation should be used to explore alternatives to the D0010 data flow (including passing DCC outputs in their original form).

Assessment Consultation Question

Do you agree that the new Supplier should transfer readings to the old Supplier using a D0010 data flow? If not, what alternatives would you recommend and rationale for these?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

What version of SMETS should the solution cover?

The Workgroup considered whether the solution should be limited to SMETS 2 (or higher version should these become available) or also open to SMETS 1 Meters. The members believed that currently the DCC would not service SMETS1 Meters, but that this was under consideration. Therefore, the Workgroup agreed that the solution should be applied to any SMETS Meter that is serviced through the DCC. This is because the SMETS version becomes irrelevant information if a SMETS 1 Meter could not be serviced by the DCC, and future-proofs the solution should that change. A Workgroup member noted that a SMETS 1 Meter will have a Daily Read Log, albeit holding 14 rather than 31 calendar days' 'midnight reads'. The solution will not preclude the new process being used, by agreement of both Suppliers, where a SMETS compliant Meter is not serviced by the DCC.

How will the Suppliers communicate when to use smart and legacy CoS processes?

The Workgroup discussed a number of communication scenarios, which included how it would be communicated that a Metering System has a smart Meter (and which version of SMETS this is), whether it is serviced by the DCC and when to use the smart or legacy processes for CoS.

Communicating that a Metering System is smart

The Workgroup noted that the Supplier Meter Registration Agent (SMRA) would inform the new Supplier (using the D0217 'Confirmation of the Registration of a Metering Point' data flow) that the Metering System had a smart Meter (J1839 'SMETS Version' data item) and whether this was serviced by the DCC (J1833 'DCC Service Flag' data item). Under both the proposed and alternative solutions, the new Supplier would then send the D0155 data flow, which could be amended to include a new 'Smart Process Indicator' data item, to the NHHMOA and NHHDC to inform them that the Metering System is a smart Meter and serviced by the DCC. The Workgroup noted that under approved [CP1395 'Distribution of Configuration Details for Smart Meters'](#), which is to be implemented on 26 February 2015, the solution uses the contract reference to communicate whether the Metering System is smart. Therefore adding the new data item would amend the CP1395 solution. The use of the new data item would improve, rather than undermine, CP1395.

When to revert to legacy CoS arrangements

The Workgroup considered at what point in the process the smart CoS process should stop and the existing CoS processes start in the event of a failure to communicate with the Meter (whether this is a communications equipment failure or another factor that prevents the communication). The Workgroup agreed that the Supplier would know on SSD when it

tries to communicate with the Meter if there is a communications failure (though not necessarily why it failed).

A Workgroup member noted that the communications failure may be temporary, so it would not be desirable to go to the existing CoS process straightaway. The Workgroup noted that Issue 53 recommended SSD+4 WD as the duration for retrieving a read before the need to revert to the legacy arrangements, which it also agreed with.

Communicating to agents when to use legacy and reverting back to smart CoS process

The Workgroup discussed how the new Supplier would inform its agents to use the legacy CoS process in the event of a communications failure. It agreed that a second D0155 data flow would be sent to communicate that the Metering System could not be serviced by the DCC. The Workgroup considered whether Suppliers should send a D0151 'Termination of Appointment or Contract by Supplier' data flow to back out the original D0155 data flow so that the second D0155 data flow could be used. It agreed that it was most likely Suppliers would send a second D0155 data flow as an update to the original (similar to a change of reading cycle) rather than backing out the original D0155 data flow and replacing it with a 'legacy' one. It also concluded that backing out should only be necessary if the Supplier uses different agents for smart and legacy metering processes.

Members also considered that the new NHHDC should send the D0170 'Request for Metering System Related Details' data flow to the old NHHDC to request read history to enable it to validate the data as per the current legacy processes.

The Workgroup considered whether the smart CoS process could be used after the legacy arrangements had been initiated, if either Supplier was subsequently able to communicate with the Meter via the DCC. It also considered whether a third D0155 data flow would then be sent to agents to inform them to use the smart CoS process and whether each D0155 data flow needs a corresponding D0151 data flow. The Workgroup concluded that once the legacy process has been initiated it would need to be completed. Thereafter, the NHHDC will start to receive routine readings for validation once communications with the Meter via the DCC has been established. Therefore, the third D0155 data flow is not that useful.

Members noted that there are currently different ways of doing things. It recognised that a Supplier might use the D0151 data flow if it wanted to use different agents for DCC serviced and non-DCC serviced Meters. The Workgroup thought that the method of communicating with agents should be included in the Assessment Consultation.

Assessment Consultation Question

Do you agree that a third D0155 data flow is not needed when communications are restored, and that only the first D0155 data flow sent should have a corresponding D0151 data flow?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

Use of the D0311 data flow

The Workgroup agreed that the old Supplier should send its reading(s) to the new Supplier using the D0311 data flow. In a situation where the old Supplier was unable to get a reading via the DCC, the Workgroup agreed that the old Supplier should provide the latest EAC and an estimated reading, which the new Supplier could forward on to its NHHDC if it also could not get a reading via the DCC.

The Workgroup discussed a potential further requirement (not included in the draft BSCP504 redlining) for the old Supplier to send a revised D0311 data flow in the event that the old Supplier sends an estimated reading at SSD+3 WD, following a communications failure, but is subsequently able to retrieve an actual reading. It was noted that the new Supplier would invoke the legacy CoS process if unable to communicate with the Meter by SSD+4 WD, so may not have time to use the old Supplier's actual reading and that the new Supplier would also be able to retrieve an actual reading in the event of communications being restored. The risk of a communications failure is low, given the DCC service levels, the risk of such a failure coinciding with a CoS event is lower and the risk of a coincident communications failure impact only one of the two Suppliers is lower still. So there is a very low probability of the new Supplier invoking the legacy process, and the old Supplier billing on an actual reading, having initially had to estimate. Even if it did occur, the legacy process timescales would probably allow the new Supplier to submit an actual read into the legacy process.

Assessment Consultation Question

Do you agree that the old Supplier should send an additional D0311 data flow in the event that it sends an estimated read following a communication failure (at SSD+3 WD) but is subsequently able to retrieve a midnight reading(s)? If so, should this be applied to both the proposed and the alternative solutions?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

A Workgroup member noted that on the Unified Network Code (UNC) and Supply Point Administration Agreement (SPAA) related change, [the Smart Change of Supplier meter read working group](#) has recommended the use of the gas equivalent 'Notification of Old Supplier Information (NOSI)' data flow to communicate the SSD midnight reading (or an estimate where the midnight read cannot be obtained). Another Workgroup member noted that the electricity Settlement equivalent NOSI flow, the D0311 data flow, is limited to domestic customers.

The Workgroup thought that the D0311 data flow would be a good mechanism for the old Supplier to communicate to the new Supplier whether it was able to retrieve the Daily Read information from the Meter, and where it could, to provide the registers and cumulative read. The Workgroup agreed that this would act as a check to ensure that the customer was billed on the same opening and closing read and that there was no under- or over-billing. This would also ensure the accuracy of Settlement. It was noted that without this or something similar, under- or over-billing could occur under two circumstances. Firstly, where either Supplier in interrogating different internal registers makes an error or the data is corrupted during upload. Alternatively, where the new Supplier is unable to access the Meter read and bills on an estimate but the old Supplier has been able to access the Meter read and bills on the SSD midnight read.

The Workgroup therefore agreed that the scope of the data flow should be extended to non-domestic customers with relevant Meters.

Assessment Consultation Question

Do you agree that the scope of the D0311 data flow should be extended to include DCC-serviced non-domestic Metering Systems and made mandatory for this solution?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

The Workgroup discussed whether the midnight reading(s) need to be validated by the old NHHDC before being sent in the D0311 data flow to the new Supplier. It was noted that readings from the smart Meter were likely to be valid and that the old Supplier would be expected to carry out a consistency check against the reading history (also bearing in mind any relevant broader knowledge about the customer's usage patterns and circumstances) to ensure that they consider the read accurate and suitable for billing and Settlement, prior to sending it on the D0311 data flow. Sending the reading to the old NHHDC to validate before sending it to the new Supplier on the D0311 data flow would reintroduce an agent dependency, delay receipt by the new Supplier and reduce the value of the D0311 data flow to the new Supplier as a check against its own readings. It could also create unnecessary delays where an accurate read fails NHHDC validation e.g. due to inaccurate read history (particularly as customers transfer from legacy to smart Meters).

Assessment Consultation Question

Do you agree that the midnight reading(s) need to be validated by the NHHDC, but do not need to be validated by the NHHDC before they are sent in the D0311 data flow to the new Supplier?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

It also agreed that the D0311 data flow should be sent to the new Supplier within 1 WD of the read being retrieved (envisaged to be SSD/SSD+1 WD) and by no later than SSD+3 WD. A Workgroup member noted that the rules for when sending the D0311 data flow under the smart CoS process would be different to the legacy arrangements. The Workgroup agreed to ask a question in the Assessment Consultation with a view to modifying the timescales for sending the D0311 data flow in the legacy process to match the proposed smart timescales. This change has not been included in the draft BSCP504 redlining.

Assessment Consultation Question

Do you agree that the timescales for sending the D0311 data flow in the legacy CoS process should be brought forward to SSD+3 WD to align with the proposed smart process? Should this be applied to both the proposed and alternative solutions?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

The Workgroup discussed the scenario where the old Supplier is unable to obtain a final reading and sends a D0311 data flow with an estimate reading. If both Suppliers are unable to retrieve a reading from the smart Meter, the old Supplier should receive a CoS reading through the legacy process. If only the new Supplier is able to obtain a reading, the old Supplier will not know that the legacy process has not been invoked. An obligation could be placed on the new Supplier to provide a reading to the old Supplier in the event that a D0311 data flow is received with an estimated reading but the new Supplier has been able to retrieve one.

It is expected that communication failure rates will be less than 1%. A communication failure coincident with a CoS will be much rarer and a coincident communications failure impacting one Supplier but not the other will be significantly rarer still. A requirement on the new Supplier to identify and resolve old Supplier missing reads could result in costs that are unlikely to be justified by expected failure rates.

Assessment Consultation Question

Do you agree that where the old Supplier is unable to obtain a reading (under the proposed solution) that responsibility for requesting a reading should rest with the old Supplier, rather than having the new Supplier proactively identify that the old Supplier is missing a reading (by means of the D0311 data flow)?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

How would the disputed CoS read processes work?

Under the current disputed readings process, as defined in MAP08, either Supplier can dispute the CoS reading provided by the new Supplier's NHHDC. The process is designed to cater for the situation where a single reading (or set of register readings) has been determined as the CoS reading(s) by the new Supplier's NHHDC and the old Supplier has good reason to suspect that the reading is incorrect (or the new Supplier has new evidence to suspect that the reading is incorrect). Under the P302 solutions (particularly under the Proposed Modification), it is proposed to widen the scope of the MAP08 processes, such that the new Supplier should raise a dispute if the old Supplier intends to use a closing reading (as notified on the D0311 data flow) which is different to an actual reading obtained by the new Supplier from the smart Meter. The current MAP08 process is design to ensure an accurate CoS reading is used, whereas the revised MAP08 process will need to include steps to avoid double billing. This is likely to include a new rule, where by readings taken from the smart Meter take precedence over other readings.

The Workgroup agreed to recommend that, as P302 would impact MAP08, this is considered under the MRA change processes.

What considerations are needed over potential issues with UTC?

The Workgroup considered issues arising from the use of UTC. ELEXON noted that SMETS2 Meters and the DCC use UTC, but Settlement, registration and In Home Displays use clock time. Changes in Settlement liabilities are deemed to occur at midnight clock time and consequently any changes to registration systems are deemed to occur at midnight clock time. In particular, the Workgroup considered whether there would be issues resulting from the Meter recording a reading at midnight UTC, but the CoS taking

place at midnight clock time. This means that, during British Summer Time (BST), the reading would be taken at 01:00 BST. So during BST, the old Supplier would be liable (in Settlement) for an additional hour's consumption which was actually taken in the new Supplier's registration and would presumably bill the customer for this additional hour. Given that the current rules allow readings taken up to SSD+5 WD on either side of the SSD to be treated as if they were taken at midnight on the SSD, this would not create any concerns in terms of Settlement accuracy. Moreover, an average domestic customer would probably consume less than 1kWh between midnight and 01:00 BST. However, this could cause customer confusion, which would need to be managed by Supplier communications.

What consequential changes are required to the legacy CoS processes?

The Workgroup identified some potential improvements to the legacy CoS processes should the Authority approve P302 (for example, bringing forward the timescale for sending a D0311 data flow to align with the proposed P302 timescale). The Workgroup agreed that this was outside the scope of P302 but that these consequential changes could be progressed through further CPs.

What would the impact be of future changes currently being considered?

The Workgroup noted that Ofgem has a stated ambition for next day switching. It agreed that P302 would be a stepping-stone towards this, but P302 could not consider other future changes that may or may not be raised or implemented. Ofgem has indicated that this is likely to be a consideration in its decision, given the links it has highlighted between faster switching and a competitive market. The supplementary question below has been included at Ofgem's request.

Supplementary Question

To what extent do you consider that each option supports fast accurate billing for both Suppliers? Do you consider that one option facilitates faster billing than the other, and if so, what is the likely magnitude of the difference (e.g. in days)?

Please provide your rationale.

The Workgroup invites you to give your views using the response form in Attachment D.

What are the likely impacts and lead times for implementing P302?

ELEXON asked the Workgroup what the likely impacts and lead times would be for implementing P302. Workgroup members agreed that as the format and use of data flows will change, Suppliers and NHHDCs would need to make changes to their systems. This is likely to require 12 months lead time to develop, test and implement the changes. The Workgroup also agreed that participants would need to update their processes.

Considerations on Implementation Date

The Workgroup originally considered whether to align the Implementation Date with the DCC go-live or to align with an appropriate BSC Release that allows for a 12 months lead time. Members were aware that the DCC go live date in December 2015 may change (this is currently being consulted on⁴), and so its preference was not to have P302 implementation contingent on this. It agreed that P302 should be implemented as part of a BSC Release on efficiency and economical grounds, noting also that a BSC Modification's Implementation Date could not be contingent on another event. Therefore, the Workgroup's original initial recommendation was that P302 should be approved with an Implementation Date of 25 February 2016 as part of the February 2016 BSC Release subject to the Authority decision being received by 24 February 2015. It was noted that this may have required complex interim solutions between the DCC go live date and the P302 Implementation Date.

However, due to other alternative solutions being explored and more time therefore needed to develop the Proposed and Alternative Modifications, the original proposed Implementation Date was not achievable and therefore the P302 Workgroup is making a revised initial recommendation of 30 June 2016 as part of the June 2016 BSC Release. Providing DCC go-live occurs in either July or October 2016 (as proposed in the DCC consultation), there will be no need for interim solutions.

⁴ http://www.smartdcc.co.uk/media/14108/141117_dcc_plan_and_im_consultation.pdf

7 Workgroup's Initial Conclusions

The majority of the Workgroup agreed that the P302 Alternative Modification would overall better facilitate the Applicable BSC Objectives compared with the existing baseline and should therefore be approved. The Proposer is also supportive of the Alternative Modification, but to allow this consultation to include the two solutions, initially supports the Proposed Modification.

The following table contains the Workgroup's initial views against each of the Applicable BSC Objectives for the proposed and alternative solutions, with the same views for each proposal. However, the Workgroup by majority believe that the Alternative Modification is stronger with respect to objective (d) than the Proposed Modification:

| Does P302 better facilitate the Applicable BSC Objectives? | | |
|--|--|---|
| Obj | Proposer's Views | Other Workgroup Members' Views ⁵ |
| (a) | <ul style="list-style-type: none"> Neutral – No impact | <ul style="list-style-type: none"> Neutral (unanimous) – as Proposer. |
| (b) | <ul style="list-style-type: none"> Neutral – No impact | <ul style="list-style-type: none"> Neutral (unanimous) – as Proposer. |
| (c) | <ul style="list-style-type: none"> Yes – as the changes would help reduce the complexity and associated cost of the CoS process for smart Meters, making customer switching a simpler, less onerous and more timely process. | <ul style="list-style-type: none"> Neutral (majority). Yes (minority of one) – as Proposer. |
| (d) | <ul style="list-style-type: none"> Yes – by ensuring the CoS Meter read process for smart Meters reflects the enhanced functionality that smart Meters will provide. The proposed changes will reduce the amount of data transfers 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 service by the DCC. | <ul style="list-style-type: none"> Yes (unanimous) – as Proposer. |
| (e) | <ul style="list-style-type: none"> Neutral – No impact | <ul style="list-style-type: none"> Neutral (unanimous) – as Proposer. |
| (f) | <ul style="list-style-type: none"> Neutral – No impact | <ul style="list-style-type: none"> Neutral (unanimous) – as Proposer. |



What are the Applicable BSC Objectives?

(a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence

(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System

(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity

(d) Promoting efficiency in the implementation of the balancing and settlement arrangements

(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]

(f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation

⁵ Shows the different views expressed by the other Workgroup members – not all members necessarily agree with all of these views.

Assessment Consultation Question

Do you believe that the Proposed Modification better facilitates the Applicable BSC Objectives than the baseline?

Please provide your rationale.

Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the baseline?

Please provide your rationale as to why it/they better facilitate the Applicable BSC Objectives.

Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the Proposed Modification?

Please provide your rationale as to whether it/they better facilitate the Applicable BSC Objectives.

The Workgroup invites you to give your views using the response form in Attachment D.

Appendix 1: Workgroup Details

Workgroup's Terms of Reference

Specific areas set by the BSC Panel in the P302 Terms of Reference

Should the new process apply to all DCC serviced smart Meters (SMETS1 and SMETS2) or just SMETS2 Meters?

What are the appropriate changes to the D0155 data flow to provide the mechanism to indicate whether:

- a site has a smart Meter; and
- the smart or non-smart CoS process should be followed?

What is the means by which the Supplier verifies the configuration of the smart Meter and notifies the NHHDC and NHHMOA what the SSC and Meter register configuration is?

What is the appropriate process assurance for the proposed CoS process changes?

In the event of a CoS event and a concurrent communications failure (or DCC opt-out) how quickly should the non-smart process be initiated?

Are there any necessary improvements to the Disputed Read Process?

What is the appropriate implementation approach for the process changes?

What changes are needed to BSC documents, systems and processes to support P302 and what are the related costs and lead times?

Are there any Alternative Modifications?

Does P302 better facilitate the Applicable BSC Objectives than the current baseline?

Assessment Procedure timetable

| P302 Assessment Timetable | |
|---|-----------------------|
| Event | Date |
| Panel submits P302 to Assessment Procedure | 12 Jun 14 |
| Workgroup Meeting 1 | 24 Jun 14 |
| Assessment Procedure Consultation | 18 Jul 14 – 08 Aug 14 |
| Workgroup Meeting 2 | 12 Aug 14 |
| Workgroup Meeting 3 | 12 Sep 14 |
| Workgroup Meeting 4 | 15 Oct 14 |
| Workgroup Meeting 5 | 07 Nov 14 |
| Second Assessment Procedure Consultation | 15 Jan 15 – 05 Feb 15 |
| Workgroup Meeting 6 | 13 Feb 15 |
| Panel considers Workgroup's Assessment Report | 12 Mar 15 |

P302
Second Assessment
Procedure Consultation

16 January 2015

Version 1.0

Page 29 of 33

© ELEXON Limited 2015

Workgroup membership and attendance

| P302 Workgroup Attendance | | | | | | |
|---------------------------|------------------------------------|-----------|-----------|-----------|-----------|-----------|
| Name | Organisation | 24 Jun 14 | 12 Aug 14 | 12 Sep 14 | 15 Oct 14 | 07 Nov 14 |
| Members | | | | | | |
| David Kemp | ELEXON (<i>Chair</i>) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Simon Fox | ELEXON (<i>Lead Analyst</i>) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Paul Saker | EDF Energy (<i>Proposer</i>) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Adam Iles | British Gas | ✓ | ✓ | ✓ | ✓ | ✓ |
| Stephen Johnson | IMServ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Eric Graham | TMA | ✓ | ✓ | ✗ | ✗ | ✗ |
| Seth Chapman | G4S | ✓ | ✓ | ✓ | ✓ | ✓ |
| Gary Burrows | Opus Energy | ✓ | ✓ | ✗ | ✓ | ✓ |
| Rachael Burn | E.ON Energy | ✓ | ✓ | ✗ | ✗ | ✗ |
| Dave Smith | npower | ✓ | ✓ | ✓ | ✓ | ✓ |
| Claire Hemmens | SSE | ✓ | ✓ | ✓ | ✓ | ✗ |
| Colin Frier | Siemens | ✓ | ✓ | ✓ | ✓ | ✗ |
| Attendees | | | | | | |
| Jon Spence | ELEXON (<i>Design Authority</i>) | ✓ | ✓ | ✓ | ✓ | ✓ |
| Tim Kerr | ELEXON (<i>Lead Lawyer</i>) | ✓ | ✓ | ✗ | ✓ | ✓ |
| Rachel Hay | Ofgem | ✓ | ✓ | ✓ | ✓ | ✓ |
| Andrew Wallace | Ofgem | ✗ | ✓ | ✗ | ✗ | ✗ |
| Laura Zielinski | npower | ✗ | ✓ | ✓ | ✓ | ✓ |
| David Rodger | Scottish Power | ✗ | ✗ | ✗ | ☎ | ☎ |
| Tim Newton | E.ON Energy | ✗ | ✗ | ✗ | ✗ | ✓ |
| Mark Young | First Utility | ✗ | ☎ | ✗ | ✗ | ✗ |

Appendix 2: Glossary & References

Acronyms

Acronyms and other defined terms used in this document are listed in the table below.

| Glossary of Defined Terms | |
|---------------------------|---|
| Acronym | Definition |
| AA | Annualised Advance |
| BSC | Balancing and Settlement Code |
| BSCP | Balancing and Settlement Code Procedure |
| BST | British Summer Time |
| CoS | Change of Supplier |
| COSEG | Change of Supplier Expert Group |
| CP | Change Proposal |
| DCC | Data and Communications Company |
| DSO | Distribution Systems Operator |
| DTC | Data Transfer Catalogue |
| EAC | Estimated Annual Consumption |
| MPAS | Meter Point Administration Service |
| MRA | Master Registration Agreement |
| MTD | Meter Technical Details |
| NHH | Non Half Hourly |
| NHHDA | Non Half Hourly Data Aggregator |
| NHHDC | Non Half Hourly Data Collector |
| NHHMOA | Non Half Hourly Meter Operator Agent |
| SMETS | Smart Metering Equipment Technical Specifications |
| SMRA | Supplier Meter Registration Agent |
| SPAA | Supply Point Administration Agreement |
| SSC | Standard Settlement Configuration |
| SSD | Supply Start Date |
| TPR | Time Pattern Regime |
| UNC | Unified Network Code |
| UTC | Coordinated Universal Time |
| WD | Working Day |

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

| DTC Data Flows and Data Items | |
|-------------------------------|--|
| Number | Name |
| D0010 | Meter Reading |
| D0011 | Agreement of Contractual Terms |
| D0052 | Affirmation of Metering System Settlement Details |
| D0055 | Registration of Supplier to Specified Metering Point |
| D0058 | Notification of Termination of Supply Registration |
| D0086 | Notification of Change of Supplier Readings |
| D0148 | Notification of Change to Other Parties |
| D0149 | Notification of Mapping Details |
| D0150 | Non Half Hourly Meter Technical Details |
| D0151 | Termination of Appointment or Contract by Supplier |
| D0152 | Metering System EAC/AA History |
| D0153 | Notification of Data Aggregator Appointment and Terms |
| D0155 | Notification of Meter Operator or Data Collector Appointment and Terms |
| D0170 | Request for Metering System Related Details |
| D0209 | Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator |
| D0217 | Confirmation of the Registration of a Metering Point |
| D0260 | Notification from MPAS of Old Supplier Registration Details |
| D0311 | Notification of Old Supplier Information |
| J1833 | DCC Service Flag |
| J1839 | SMETS Version |

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

| External Links | | |
|----------------|--|---|
| Page(s) | Description | URL |
| 5, 20 | CP1395 page on the ELEXON website | https://www.elexon.co.uk/change-proposal/cp1395/ |
| 6 | Ofgem open letter on reforming the CoS read process to make use of the benefits of smart Meters on the Ofgem website | https://www.ofgem.gov.uk/publications-and-updates/open-letter-reforming-change-supplier-cos-meter-read-process-smart-electricity-meters |
| 7 | Issue 53 page on the ELEXON website | http://www.elexon.co.uk/smg-issue/issue-53/ |

| External Links | | |
|----------------|--|---|
| Page(s) | Description | URL |
| 8 | MAP 08 document on the MRA Agreed Procedures page on the MRA website | http://mrasco.com/admin/documents/MAP08%20v3.1%20-%20The%20Procedure%20for%20Agreement%20of%20Change%20of%20Supplier%20Readings%20and%20Resolution%20of%20Disputed%20Change%20of%20Supplier%20Readings.pdf |
| 10 | BSC Section page on the ELEXON website | https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/ |
| 10 | BSCPs (BSCP504, BSCP514) page on the ELEXON website | https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/ |
| 14 | CP1388 page on the ELEXON website | http://www.elexon.co.uk/change-proposal/cp1388/ |
| 22 | Smart Change of Supplier Meter read working group page on the SPAA website | http://www.spaa.co.uk/committees-groups/detail?committeeid=206303 |
| 26 | Consultation on DCC go-live date. | http://www.smartdcc.co.uk/media/14108/141117_dcc_plan_and_im_consultation.pdf |