CP1444 'Extend the timescale of CoP10 Proving Tests until the implementation of P272'

This CP Consultation was issued on 10 August 2015 as part of CPC00758, with responses invited by 4 September 2015.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ	0 / 1	Supplier Agent
TMA Data Management Ltd	0 / 1	Supplier Agent
Siemens Operational Services	0 / 1	Supplier Agent
SmartestEnergy	1 / 0	Supplier
Western Power Distribution	1 / 0	Distributor, Supplier Agent
Scottish Power	1 / 0	Supplier
E.ON Energy Solutions	1 / 0	Supplier
British Gas	1 / 0	Supplier
Stark Software International Limited	0 / 1	Supplier Agent
SSE Energy Supply Limited	1 / 1	Supplier, Supplier Agent
EDF Energy	10 / 0	Generator, Supplier, Non Physical Trader, ECVNA, Supplier Agent, Consolidator

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
IMServ	✓	✓	✖	✓
TMA Data Management Ltd	✓	✓	✓	✓
Siemens Operational Services	✓	✓	✖	✓
SmartestEnergy	✓	✓	✖	✓
Western Power Distribution	✓	✓	✖	✓
Scottish Power	✓	✖	✖	✓
E.ON Energy Solutions	✓	✓	✖	✓
British Gas	✓	✖	✖	✓
Stark Software International Limited	✓	✓	✖	✓
SSE Energy Supply Limited	✓	✖	✖	✓
EDF Energy	✓	✓	✖	✓

Question 1: Do you agree with the CP1444 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	0	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	Agree – At IMServ we expect to perform a large number of CoMCs over the P272 migration period, completing the required significant volume of proving tests within current timescale has been identified internally as a risk and previously highlighted by ourselves in industry meetings and forums: extending the timescales reduces that risk.
TMA Data Management Ltd	Yes	We support the extension of proving tests for COP10 meters migrated as part of P272 from NHH to HH.
Siemens Operational Services	Yes	By increasing the timescale that the business has to carry out the Proving Tests on CoP10 meters during the implementation of P272 will allow us to more effectively manage this part of the process and to resource accordingly. The business will be able to level out the peak migration numbers across non peak months and therefore continue to use experienced resource, rather than inexperienced resource for short peak periods which could lead to data quality issues.
SmartestEnergy	Yes	It seems unlikely that a further 15WD on top of the existing rules will enable much more resourcing of the peaks which will occur from Contract end dates as it is still a peak well in excess of the 'business-as-usual' numbers of proving tests. However we are keen than proving tests still occur for these meters so if the Agents believe this increase to be of use for a temporary measure we will support it.
Western Power Distribution	Yes	-
Scottish Power	Yes	By increasing the timescale for the Proving Tests on CoP10 Meters HHMOAs will be able to effectively manage their part of the migration process and to resource accordingly by allowing them to smooth out the peaks and troughs in migration volumes.

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	-
British Gas	Yes	-
Stark Software International Limited	Yes	It would provide flexibility between HHDC and HH MOP to resolve any anomalies experienced in COP10 meter during the proving test process from meter installing, collecting, issuing and proving.
SSE Energy Supply Limited	Yes	We are supportive of providing agents with an extended period of time to complete Proving Tests as we acknowledge there will be a steep increase in the number of tests being required throughout P272 migration. This solution is preferable to the agents rushing to complete the tests and doing so inaccurately (increased settlement risk) or the agents finding themselves non-compliant. This change proposal serves to pro-actively manage the risk of either scenario happening.
EDF Energy	Yes	Yes, we believe the solution provides a balance between Settlement risk and recognition of the increase in number of Proving Tests that would be required to be carried out by HHMOAs during the period specified.

Question 2: Do you agree that the draft redlining delivers the CP1444 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	0	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
IMServ	Yes	-
TMA Data Management Ltd	Yes	The temporary and specific nature of the extension is clear in the draft changes to BSCPs. It only applies to COP10 meters and only for meter proving initiated within a specific date range.
Siemens Operational Services	Yes	-
SmartestEnergy	Yes	-
Western Power Distribution	Yes	-
Scottish Power	Yes	-
E.ON Energy Solutions	Yes	-
British Gas	Yes	-
Stark Software International Limited	Yes	-
SSE Energy Supply Limited	Yes	-
EDF Energy	Yes	-

Question 3: Will CP1444 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
8	3	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	Yes – Positive impact for both HH MOP and DC
TMA Data Management Ltd	Yes	As a HHDC, our organisation is impacted.
Siemens Operational Services	Yes	System Our business will need to change standing data within our Proving database application which we estimate to be less than one hour's work. Processes & Documents Our documentation and processes will be updated to reflect the amended SLA. Resource CP1444 will mean our business will not be required to employ extra staff during the peak migration months. This additional temporary staff will not have the knowledge or expertise of the resource that we will dedicate to the CoMC process and Proving Tests during the duration of P322. Costs Our business will have reduced costs with the implementation of CP1444 as we will have a reduced resource requirement. This is based on analysis we have undertaken on the overall industry data and the initial view of the supplier migration plans from NHH to HH.
SmartestEnergy	Yes	We only operate as Supplier. It will change internal processes to check for Proving tests. However, it will not affect systems so the impact is low.
Western Power Distribution	Yes	No systems changes will be required, however, it will assist in enabling us to meet BSCP requirements.
Scottish Power	No	-

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	Enabling further time to complete these proving tests will have a positive impact, as increased volumes of these are completed through the migration period.
British Gas	No	-
Stark Software International Limited	Yes	As HHDC, the proving test process time line will be particularly affected by COP10 meter types
SSE Energy Supply Limited	No	-
EDF Energy	Yes	A small change would be required to documentation and processes, but there will be no system impact.

Question 4: Will your organisation incur any costs in implementing CP1444?

Summary

Yes	No	Neutral/No Comment	Other
1	10	0	0

Responses

Respondent	Response	Rationale
IMServ	No	-
TMA Data Management Ltd	Yes	There will be minor one-off costs associated with the updates of internal monitoring reports.
Siemens Operational Services	No	-
SmartestEnergy	No	-
Western Power Distribution	No	-
Scottish Power	No	-
E.ON Energy Solutions	No	-
British Gas	No	-
Stark Software International Limited	No	-
SSE Energy Supply Limited	No	-
EDF Energy	No	-

Question 5: Do you agree with the proposed implementation approach for CP1444?

Summary

Yes	No	Neutral/No Comment	Other
11	0	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	-
TMA Data Management Ltd	Yes	-
Siemens Operational Services	Yes	Siemens Operational Services agree with the implementation alignment with P322, as the extension of the CoP10 Proving Test timescales from this date will allow us to level out the peaks of proving tests required during the migration period.
SmartestEnergy	Yes	It makes sense for this proposal to run in line with current P272 migration timescales.
Western Power Distribution	Yes	-
Scottish Power	Yes	The implementation date of CP1444 aligns with the implementation of P300 on 5th November 2015, after which we expect that the number of transfers of Metering Systems will notably increase following the introduction of the two new Measurement Classes. This will allow HHMOAs to be able to better handle the volume of Proving Tests required before the implementation of P272.
E.ON Energy Solutions	Yes	Yes. This is a pragmatic approach to keep arrangements within the P322 migration window.
British Gas	Yes	-
Stark Software International Limited	Yes	-
SSE Energy Supply Limited	Yes	We agree this should be implemented in the November release to ensure the extended proving test window aligns with the increase in proving tests being required, i.e. from P300 implementation.
EDF Energy	Yes	We agree we the November 2015 implementation date.

Question 6: Do you consider that the potential risk to Settlement from extending the timescales for CoP10 proving tests would outweigh the consequences of a HHMOA failing to meet timescales?

Summary

Yes	No	Neutral/No Comment	Other
1	10	0	0

Responses

Respondent	Response	Rationale
IMServ	No	The extended timescales still allow for date to be corrected within the early part of the settlement window as noted by SVG. Furthermore we note ELEXON' concern regarding whether additional time would resolve the issue of "no load "sites. In response, our experience is that the majority of these issues occur on new connections and installations and this therefore would not arise on these P272 PC 5 – 8 AMR meters which are already in place and live.
TMA Data Management Ltd	No	The proving process ensures that meter technical details held by the HHDC match the meter technical details held by the MOP. The increased volume of proving tests expected during the P272 migration will be challenging for MOPs and HHDCs. The proving timescales are measured from the Effective from date of the change of agent. Increased timescales will allow agents to manage their workload more effectively. Proving tests are part of data quality checks, any data quality issue not resolved in time for SF would be resolved in time for R1 settlement runs.
Siemens Operational Services	No	Our business does not believe that extending the proving test timescales will prove a risk to Settlement. The meters involved are already providing settlement data in the NHH market, approximately 50% of the meters to be migrated are Whole Current and therefore the only risk on them is if a fault is outstanding at the time of migration. As these meters are Sub100 Kwh meters the energy consumption is significantly lower than existing HH settled meters, and the therefore their risk to Settlement is significantly lower.
SmartestEnergy	No	By moving the number of working days to prove the meter, it means a delay to the detection of any

Respondent	Response	Rationale
		material issues with volume, as they are more likely to get picked up at R1 rather than SF. The Proposer has stated that the additional assurance a proving test provides to settlement is relatively minor because the Meter must be providing regular remote NHH monthly readings prior to HH conversion. However, discussion with some Agents has highlighted that this is not necessarily an indication that regular HH reads are retrievable.
Western Power Distribution	Yes	-
Scottish Power	No	Increasing the Proving Test timescales will help reduce the likelihood of data quality issues arising which could potentially be a Risk to Settlement if the expected volume of Proving Tests is to be carried out to the existing 15+15WD timescales.
E.ON Energy Solutions	No	We consider the risks to overall settlement accuracy resulting from this change to be minimal. Given existing timescales to complete settlement runs there should be plenty of opportunity to correct any erroneous data that may arise through individual metering system issues.
British Gas	No	We do not believe there to be a risk o settlement. These sites have recently been placed into scope through CP1411 and extending the proving test window to 30WDs will not have a great impact to settlements. It will allow the agents more time to complete during times of high volumes of change of measurement class.
Stark Software International Limited	No	Any settlement issue would be raised via fault management to MOP and/or escalate to relevant Supplier additionally if HHMOA fail to meet the timescales for CoP10 proving test.
SSE Energy Supply Limited	No	The risk of tests not being completed accurately would impact settlement integrity more than the extension of the window for completing the proving test. Whilst this solution allows for an extended window it does not necessarily follow that all proving tests will be completed within the extended period (D+15 to D+30).
EDF Energy	No	We believe the proposal provides assurance to the HHMOA to carry out activities compliantly whilst not providing great risk to Settlement. As per our response to CP1429 we believe the 15 working day timescale for COP10 metering systems is disproportionate to the Settlement risk in

Respondent	Response	Rationale
		comparison to COP5 metering systems which have the same timescale, therefore risk should be low.

Question 7: Do you consider that the proposed 30WD timescales is long enough to resolve each failed proving test during the P272 migration period?

Summary

Yes	No	Neutral/No Comment	Other
9	0	1	1

Responses

Respondent	Response	Rationale
IMServ	Yes	We understand that most Suppliers will migrate to HH on contract end dates and this usually falls on the last day of each month. This means we are expecting peaks in activity one day every month, we will aim to clear all outstanding proving tests before the next month end peak so in theory 30 days should be sufficient.
TMA Data Management Ltd	Yes	-
Siemens Operational Services	Yes	Our business believes on analysis we have undertaken on the overall industry data and the initial view of the Supplier Migration Plans from NHH to HH, that this proposal is a considered compromise between risk to Settlement and the HHMOA failing SLA.
SmartestEnergy	Unsure	The Agents are best placed to answer this. The Proposer refers to being able to use existing dedicated resource rather than outsourcing; however, this seems a quite specific rationale and it would be interesting to see if all agents agree. An additional 15WD does not seem to be a significant extension when planning/hiring resource. That said, we would not encourage a further extenuation in light of the potential impact to settlement as per Question 6.
Western Power Distribution	Yes	-
Scottish Power	Yes	-
E.ON Energy Solutions	Yes	Yes, this seems sensible. In general terms we see few failures historically, however with the increased volumes that are expected through the migration period the increased time should provide flexibility to ensure this remains so.

Respondent	Response	Rationale
British Gas	Yes	30WD is an appropriate length of time; however this is dependent on migration volumes. There may be times where it will be more difficult to meet the 30WD timescales.
Stark Software International Limited	Yes	Provided the appointed HHMOA follows the proving test process as instructed in BSCP and notifies HHDC if there are any unexpected circumstances.
SSE Energy Supply Limited	Yes	-
EDF Energy	-	-

Question 8: How will the additional time proposed by CP1444 help to resolve the reasons for not being able to complete a proving test within the current timescales?

Responses

Respondent	Response
IMServ	More time to deal with comms failures/site visits etc.
TMA Data Management Ltd	As mentioned in our response to question 6, the proving test timescales for P272 migration sites will start from the change of agent effective from date. The clock start ticking from the agent appointment start date; the extended timescales will allow agents to stagger the proving test process start for sites with the same agent appointment start date and finish them within the extended timescales.
Siemens Operational Services	Our business will not be required to employ extra temporary resource during the peak migration months, who will not have the knowledge or expertise of the resource that we will use during the duration of P322. Additional extra resource for short peak periods with inexperienced individuals could lead to data quality issues.
SmartestEnergy	As per previous Reponses we are not sure it does help; there is not enough detail in the Proposers rationale.
Western Power Distribution	-
Scottish Power	It has previously been noted in an Ofgem letter to the BSC Panel, dated 20 April 2015, that there is a potential risk to Settlement because of the CoMC process and the volume associated with the migration so extending the timescales should negate the overall risk to settlement.
E.ON Energy Solutions	The CP will provide additional time to plan and complete these tests in a period when the industry is going through major change. As a result greatly increased volumes of metering systems will be undergoing these tests compared to "business as usual" workloads.
British Gas	The extension will allow agents to cope with high levels of activity that have not previously been experienced, especially where there is CoMC activity across the industry.
Stark Software International Limited	It gives HHMOA extra flexibility to schedule Site visits for sites where access has been an issue. Similarly allows the HHDC flexibility to wait for available hand held reads on no comms sites.
SSE Energy Supply Limited	We agree with the proposer that extending the timescale would allow peaks to be smoothed, i.e. during troughs they will be completed within existing timescales and during peaks agents will make use of the extended period.
EDF Energy	The additional time proposed will allow more flexibility for carrying

Respondent	Response
	out a greater number of Proving Tests during the migration period.

Question 9: Do you have any further comments on CP1444?

Summary

Yes	No
1	10

Responses

Respondent	Response	Comments
IMServ	No	-
TMA Data Management Ltd	No	-
Siemens Operational Services	No	-
SmartestEnergy	No	-
Western Power Distribution	No	-
Scottish Power	No	-
E.ON Energy Solutions	No	-
British Gas	No	-
Stark Software International Limited	Yes	Though the CP1444 proposed solution only applies to CoP10 meters, we are interested in knowing if the timescale will be reviewed for other CoP levels and if there is any guidance on proving test received for MPANs which have no load; outstanding D0003s with no response received from MOP more than 30 days etc.
SSE Energy Supply Limited	No	-
EDF Energy	No	-

BSCP502

No comments received.

BSCP514

No comments received.