

CP Consultation Responses

CP1475 'Remove obligation to re-date final NHH Meter readings on CoMC'



This CP Consultation was issued on 7 November 2016 as part of CPC00771, with responses invited by 2 December 2016.

Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---------------------------|--|--------------------------|
| British Gas | 1 / 0 | Supplier |
| E.ON Energy Solutions | 1 / 0 | Supplier |
| Npower Group PLC | 6 / 0 | Supplier, Supplier Agent |
| ScottishPower | 0 / 1 | Supplier Agent |
| Siemens Managed Services | 0 / 1 | Supplier Agent |
| SSE Energy Supply Limited | 1 / 1 | Supplier, Supplier Agent |
| Stark | 0 / 1 | Supplier Agent |
| TMA Data Management Ltd | 0 / 1 | Supplier Agent |

Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|---------------------------|--------|-----------|--------|-------------|
| British Gas | ✗ | ✓ | ✓ | ✓ |
| E.ON Energy Solutions | ✓ | ✓ | ✓ | ✓ |
| Npower Group PLC | ✓ | ✓ | ✓ | ✓ |
| ScottishPower | ✓ | ✗ | ✗ | ✓ |
| Siemens Managed Services | ✗ | ✓ | ✓ | ✗ |
| SSE Energy Supply Limited | ✗ | ✓ | ✓ | ✗ |
| Stark | ✓ | ✗ | ✗ | ✓ |
| TMA Data Management Ltd | ✓ | ✓ | ✓ | ✓ |

Question 1: Do you agree with the CP1475 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 3 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--------------------------|----------|--|
| British Gas | No | We understand the rationale behind the change to remove the day EAC but we believe going forward this EAC value will have a low impact on a Suppliers performance and SP08a performance once P272 is implemented. We believe this will only alter the BAU CoMC process and would not help facilitate elective HH with CP1474 being considered. As the solution would be implemented from the 29/06/17 we would expect the level of CoMC activity using this process to drop. |
| E.ON Energy Solutions | Yes | We believe the re-dating of the final read is no longer required and whilst we understand the rationale for its need in the past, we believe now is the right time to correct an inefficient process. The re-dating is potentially detrimental to the move to HH settlement. The amendment to the process proposes removing a risk of potential double counting and receipt of exceptions. |
| Npower Group PLC | Yes | Re-dating final reads is an extra step in a process which sits with an MOA even though the constraint which the step was borne from is one attributed to a NHHDC. It is a practical requirement that the final read the NHHDC receives in the CoMC process is at D+1 to their last appointment date and as such they should be able to process this read. |
| ScottishPower | Yes | We agree with the proposed solution |
| Siemens Managed Services | No | <p>The justification for CP1475 is due to a significant increase in the volumes of CoMC from NHH to HH. We believe by the implementation date of 29 June 2017 the justification will no longer be applicable as the large volume of CoMC required for P272 will have occurred and the ongoing number of CoMC will be at a significantly lower volume. Therefore the existing process should remain.</p> <p>To implement this Change there will be significant costs to us due to system changes.</p> |

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| SSE Energy Supply Limited | No | <p>In our assessment of this proposal we do not believe there is an issue that needs to be addressed and therefore we do not see how the proposed solution provides benefits over and above the status quo.</p> <p>We are also unconvinced this is properly relevant to the Elective HHS process as we do not view this, in any way, as a material cost barrier for Elective HHS.</p> |
| Stark | Yes | <p>As well as removing an extra physical step to the process, adding to potential logistical complication, I agree with the proposer's rationale that this will improve Supplier settlement accuracy by removing the double charging.</p> |
| TMA Data Management Ltd | Yes | - |

Question 2: Do you agree that the draft redlining delivers the CP1475 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7 | 1 | 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 |
|---------------------------|----------|---|
| British Gas | Yes | - |
| E.ON Energy Solutions | Yes | - |
| Npower Group PLC | Yes | - |
| ScottishPower | Yes | We agree that the draft relining delivers the proposed solution |
| Siemens Managed Services | No | For a CoMC for when it is NOT concurrent with CoS it will require a new section in BSCP504. |
| SSE Energy Supply Limited | Yes | - |
| Stark | Yes | - |
| TMA Data Management Ltd | Yes | - |

Question 3: Will CP1475 impact your organisation?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 2 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--------------------------|----------|--|
| British Gas | Yes | Our understanding of the change is that it will impact our BAU CoMC process. As a Supplier we will be receiving a D0010 after the NHHDC de-appointment date and on the date that the Supply has been upgraded to HH. To be able to process this we would have to complete system changes to be able to accept and process this read for billing following the asset change. |
| E.ON Energy Solutions | Yes | This will result in some process changes. |
| Npower Group PLC | Yes | There will be minimal process change to our MOA practices to remove the step to re-date a final read. |
| ScottishPower | No | This will have little impact on our organisation |
| Siemens Managed Services | Yes | <p>To implement this Change there will be Significant system changes to our bespoke system. We believe the first problem around this CP relates to the way readings can/will be handled. The issues we foresee will relate to how the system distributes the correct readings to the correct parties (in the MO context) and then the ability to process readings (DC context) outside of our appointment window. Specifically if the MO removal read is not re-dated this means having the initial and final readings taken in the New (HH) MOs appointment window and then having to separate the readings such that the old MO (NHH) will issue the final reading to the old DC for a reading taken beyond its appointment closure, while maintaining the current process of issuing the initial to the New (HH) DC etc. The old DC (NHH) will need to then be able to process a reading, validate it and distribute it, all after the close down of the DC appointment.</p> <p>The second issue we foresee will centre around issuing the correct MTD flows to correct parties. At present the old MO should issue a removal D0150 to old DC et al with a removal date of a minute to midnight on CoMC date-1, if we are then moving</p> |

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| | | the removal date to within the new HH MO window and this requirement is still in place then our system currently would issue a removal and install D0268 all for the new MO (HH) appointment because the event happens in this agent's appointment window, this is then likely to impact the old DC, old Supplier and old LDSO and well as the equivalent new Agents. To resolve this issue to meet the CP requirements it would involve significant system development and testing effort. |
| SSE Energy Supply Limited | Yes | We anticipate system impacts will be required. |
| Stark | No | - |
| TMA Data Management Ltd | Yes | There is a potential system impact as NHHDC. |

Question 4: Will your organisation incur any costs in implementing CP1475?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 2 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------------|----------|--|
| British Gas | Yes | - |
| E.ON Energy Solutions | Yes | The impacts we believe are minimal. |
| Npower Group PLC | Yes | We anticipate incurring costs when making the necessary system changes. |
| ScottishPower | No | We do not expect to incur any costs with this implementation |
| Siemens Managed Services | Yes | A one-off cost to implement the system changes to accommodate the new process to handle an incoming D0010 to the DC. Timescales to meet the proposed Implementation Date are very challenging. |
| SSE Energy Supply Limited | Yes | One off costs to amend systems. |
| Stark | No | - |
| TMA Data Management Ltd | Yes | There could be one-off costs. |

Question 5: Do you agree with the proposed implementation approach for CP1475?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 2 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|---------------------------|----------|--|
| British Gas | Yes | - |
| E.ON Energy Solutions | Yes | - |
| Npower Group PLC | Yes | - |
| ScottishPower | Yes | We agree with the proposed implementation |
| Siemens Managed Services | No | If the CP is Approved we do not believe that the proposed June 2017 Implementation is achievable for us because of the amount of system development work that we would have to undertake. |
| SSE Energy Supply Limited | No | There are a number of significant IT changes due for delivery in June 2017. Notwithstanding our view that this change is not necessary, the Elective HHS market would only be opening in June 2017 and therefore the perceived financial impact stated in the proposal (double-charging) as a result of Change of Measurement Class is highly unlikely, in our view, to be of consequence. |
| Stark | Yes | Beneficial to align with Ofgem's elective half-hourly settlement approach. |
| TMA Data Management Ltd | Yes | - |

Question 6: Do you have any further comments on CP1475?

Summary

| Yes | No |
|-----|----|
| 2 | 6 |

Responses

| Respondent | Response | Comments |
|---------------------------|----------|---|
| British Gas | Yes | We believe this change would have been more relevant prior to the P272 migration. Implementing this change now will result in altering the CoMC BAU process which will be used for a limited number of sites post implementation. |
| E.ON Energy Solutions | No | - |
| Npower Group PLC | No | - |
| ScottishPower | No | We have no further comments |
| Siemens Managed Services | Yes | <ul style="list-style-type: none">What volumes are expected for CoMC NHH to HH & CoMC NHH to HH CoS? Our assumption is the majority of them will not be CoMC NHH to HH CoS.Will the MRA Working Practice Product Set 'WP66. Change of Measurement Class – NHH to HH' also be updated to reflect the new guidelines? |
| SSE Energy Supply Limited | No | - |
| Stark | No | - |
| TMA Data Management Ltd | No | - |

BSCP504

| Respondent | Location | Comment |
|--------------------------|-----------------------------|---|
| Siemens Managed Services | BSCP504 | The present process for a CoS event a D0086 is produced for Notification of Change of Supplier Readings. If there is not a CoS event and only a CoMC no D0086 will be produced. A new section for when CoMC it is NOT concurrent with CoS will be required. |
| Siemens Managed Services | BSCP504 – 3.3.1 Footnote 56 | If the above is True, will this need amending or removing? |