

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	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. To implement this Change there will be significant costs to us due to system changes.

Respondent	Response	Rationale
SSE Energy Supply Limited	No	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. 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.
Stark	Yes	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.
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	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. 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

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	- 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?