

CP Consultation Responses

CP1483 'Changes to BSCP550 – Shared Metering Arrangements' CP2



This CP Consultation was issued on 10 April 2017 as part of CPC00776, with responses invited by 5 May 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
E.ON Energy Solutions	1/0	Supplier
IMServ	0/1	Supplier Agent
Npower	1/0	Supplier
ScottishPower	2/1	Generator, Supplier, Supplier Agent
SSE Energy Supply Limited	1/0	Supplier
TMA Data Management Ltd	0/1	Supplier Agent

Question 1: Do you agree that the amended redlining delivers the CP1483 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
E.ON Energy Solutions	Yes	We agree with the proposal to change “best endeavours” to “reasonable endeavours” and believe this better reflects the original intent of the change. Best endeavours would place onerous requirements on parties which may not be practicable.
IMServ Europe	Yes	Although, I have responded ‘Yes’ this is not without some reservations. The fact that SVG has suggested this change implies that CSDs are now considered some form of legal document. My view is that historically this has not been the case. However, if we now view these documents in a different way, we need to reflect this in all CSDs. The implication here is that we are reinforcing the message that HHDCs need to strictly comply with CSDs (otherwise why are we bothering to change one word), whilst also within the same CSD introducing new requirements alluding to processes not covered in any CSD, this clearly an inconsistent approach. I also do not believe that in practice this is a material change that warranted a further round of consultations. If BSCP550 is to deliver a robust set of processes, there are more important issues, outside of the scope of this CP to consider. There is therefore a mixed message to the industry as the focus in this consultation is solely terminology (involving cost and time) and not the process weaknesses which are of much greater significance and risk.
Npower	Yes	I can confirm that we are happy to support the redlining to this CP.
ScottishPower	Yes	-

Respondent	Response	Rationale
SSE Energy Supply Limited	Yes	Comfortable with the amendment to 'reasonable endeavours'.
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	We agree with the amended redlining.

Question 2: Do you have any further comments on CP1483?

Summary

Yes	No
3	4

Responses

Respondent	Response	Comments
E.ON Energy Solutions	No	-
IMServ Europe	No	-
Npower	Yes	These changes will be to allow visibility of the required data within the Agent Appointment flows, which will create minor process changes for our business and will need to be added into any future LWP updates. We would also like to push for implementation of all the changes for February 2018 and onwards because of the number of ongoing changes that the industry is already implementing this year. A longer timescale for implementation will be beneficial for us and the wider industry as a result.
ScottishPower	No	-
SSE Energy Supply Limited	No	-
TMA Data Management Ltd	Yes	Please see the CP red line text comment.
Western Power Distribution	Yes	We still do not agree with the CP1483 proposed solution, for the reasons outlined below: The proposed solution has added a final paragraph to section 1.2 to state: <u>"At the time of being appointed or de-appointed to a shared metering arrangement by a Supplier (Primary or Secondary) the MOA, HHDC and HHDA, as appropriate, shall use reasonable endeavours to confirm that the appointment details are correct and consistent. Where there is an error in appointment details, then these will be resolved with the relevant supplier."</u> This new paragraph replaces the existing

Respondent	Response	Comments
		obligation on the MOA HHDC and HHDA to respond to an appointment within 2 WD in accordance with BSCP502/BSCP503 and BSCP514 by deleting sections 3.1.9, 3.2.1.11 and 3.2.1.16. If the intention of this proposed modification is to enable the MOA to engage sooner, then removing their obligation to confirm appointment details are “complete and consistent” within 2 WDs and effectively replacing this with “reasonable endeavours” is a backward step. We can see that the HHDC will have an opportunity to raise queries on an Allocation Schedule but we can see no benefit at all for sweeping up the DA and MOP in this change. Would not a better change be just to remove the HHDC reference to sections 3.19, 32.1.11 and 3.2.1.16 rather than remove the whole sections. Our suggested changes are detailed below: New red-lined paragraph at the end of Section 1.2: <u>At the time of being appointed or de-appointed to a shared metering arrangement by a Supplier (Primary or Secondary) the MOA, HHDC and HHDA, as appropriate, shall use reasonable endeavours to confirm that the appointment details are correct and consistent. Where there is an error in appointment details then these will be resolved with the relevant Supplier.</u> Sections 3.1.9, 3.2.1.11 and 3.2.1.16 Reinstate process step but remove “HHDC” from the “From” column. While we acknowledge the responses provided by ELEXON as part of the first Assessment Report, which was presented to SVG on 4 April 2017, we would recommend that the broader issues that we have raised be considered as part of a future BSC Issue.

BSCP550

Respondent	Location	Comment
TMA Data Management Ltd	3.1.9 emailed	"At the same time as 3.1.8", 3.1.8 should take place at least 5WD before the appointment start date. In order for the HHDC to be able to validate that the appointment details for a Shared Metering arrangement MPAN have been received at least 5 WD before the appointment start date, HHDC must be aware that the site is a shared metering arrangement MPAN, so 3.1.9 should be done before 3.1.8 to enable the HHDC to validate the D0155 correctly.