

# CP Consultation Responses

## CP1483 'Changes to BSCP550 – Shared Metering Arrangements'



This CP Consultation was issued on 6 February 2017 as part of CPC00774, with responses invited by 3 March 2017.

### Consultation Respondents

| Respondent                 | No. of Parties/Non-Parties Represented | Role(s) Represented                                  |
|----------------------------|--|--|
| SSE Energy Supply Limited  | 1/0                                    | Supplier   |
| TMA Data Management Ltd    | 0/1                                    | Supplier Agent                                       |
| IMServ Europe              | 0/1                                    | Supplier Agent                                       |
| ScottishPower              | 1/1                                    | Supplier and Supplier Agent                          |
| Western Power Distribution | 4/4                                    | Distributor and Supplier Agent                       |
| E.ON Energy Solutions      | 1/1                                    | Supplier and Supplier Agent                          |
| Npower Group               | 8/1                                    | Generator, Supplier and Non Physical Trader and HHDC |

## Summary of Consultation Responses

| Respondent                 | Agree? | Impacted? | Costs? | Impl. Date? |
|----------------------------|--------|-----------|--------|-------------|
| SSE Energy Supply Limited  | ✓      | ✓         | ✓      | ✓           |
| TMA Data Management Ltd    | ✓      | ✓         | ✓      | ✓           |
| IMServ Europe              | ✓      | ✓         | ✓      | ✗           |
| ScottishPower              | ✓      | ✓         | ✓      | ✓           |
| Western Power Distribution | ✗      | ✓         | ✗      | ✓           |
| E.ON Energy Solutions      | ✓      | ✓         | ✗      | ✓           |
| Npower Group               | ✓      | ✓         | ✗      | ✓           |

## Question 1: Do you agree with the CP1483 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6   | 1  | 0                  | 0     |

### Responses

| Respondent                | Response | Rationale  |
|---------------------------|----------|--|
| SSE Energy Supply Limited | Yes      | We welcome the proactive approach in seeking to address this settlement risk concerning shared metering arrangements. The solution should support Supplier Agents in being able to highlight data errors earlier in the process, which certainly appears to be more efficient than attempting to unwind the error at a later stage.  |
| TMA Data Management Ltd   | Yes      | No comment.  |
| IMServ Europe             | Yes      | <p>We are broadly supportive of this change and the principal behind it of making the process more robust by amending those process steps which currently present both a risk of failure and also risk to settlement.</p> <p>The proposed changes follow on from suggestions which we raised with ELEXON last year.</p>  |
| ScottishPower             | Yes      | <p>ScottishPower are in agreement with the Proposal, as this inherent risk is something that should be addressed. However due to the low volume i.e.: only 10 sites, we are keen that the solution is cost effective of the risk, so potentially costly system changes to data flows used during the registration process should be avoided where possible, as these changes would impact all change of supplier activities to address an issue that impacts only 10 sites across the UK.</p> <p>We would therefore propose that email communication be utilised at this present time. If the risk were to increase beyond an acceptable level at a later date, then changes to dataflow should then be explored.</p> <p>We would also like the process of identifying a shared metering site to become consistent, as currently we are reliant on the customer advising us of this.</p> |

| Respondent                 | Response | Rationale  |
|----------------------------|----------|--|
| Western Power Distribution | No       | <p>The proposed solution has added a final paragraph to section 1.2 to state:</p> <p><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 best 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></p> <p>This new paragraph replaces the existing 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.</p> <p>If the intention is 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 "best endeavours" is a backward step.</p> <p>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.</p> <p>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.</p> |
| E.ON Energy Solutions      | Yes      | <p>We are supportive of the intent of this modification and believe this will have a positive impact from a HHDC perspective.</p> <p>We believe the change will reduce risks by enabling supplier agents to alert the supplier, facilitating a proactive approach to shared metering set ups. The changes proposed to the BSCP provide further clarity.</p>  |
| Npower Group               | Yes      | <p>Npower is generally supportive of this change. It is in the best interests of all parties for the agents to be informed of the allocation schedule as soon as possible.</p>   |

## Question 2: Do you agree that the draft redlining delivers the CP1483 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5   | 2  | 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   |
|---------------------------|----------|---|
| SSE Energy Supply Limited | Yes      | No comment.   |
| TMA Data Management Ltd   | Yes      | Please note that the D0155 is sent electronically and automatically handled whilst the schedule allocation, informing the HHDC that a site is subject to a Shared Metering Arrangement is sent separately, by other means. The appointment will be automatically accepted, the HHDC will only be able to validate after the facts, once the D0155 has been processed.   |
| IMServ Europe             | No       | <p>Although the red line version appears to provide greater awareness of these sites and how to deal with them, recent practical experience of the process has highlighted to us a number of further concerns that remain unsolved within the proposed change.</p> <p>While we are happy to reject Supplier Appointments where insufficient notice has been given, HHDCs would have to know at the point the Appointment flow is received, that the site is a Shared SVA Metering Point, so this information needs to be provided before the D155 is sent, ideally a number of days before. Unless this was to be the case, HHDCs would be unable to be able to comply with this BSCP, as it would mean any appointment would have to be reviewed before being accepted / rejected.</p> <p>The alternative would be to include an indicator within the appointment flow itself but the red line changes don't mention this.</p> <p>Also, given that the appointment is being rejected due to insufficient notice being given (rather than</p> |

| Respondent                 | Response | Rationale   |
|----------------------------|----------|---|
|                            |          | <p>a commercial issue between Supplier and Agent), this must be reflected in a BSCP somewhere and probably should be covered by BSCP502 as it isn't currently detailed there.</p> <p>Please see our specific comments on the redlined text version of BSCP550 below.</p> <p>How does the HHMO know the site is shared and the MSIDs involved, they don't receive an Allocation schedule? Again, is it intended that this be included in the appointment flow?</p> |
| ScottishPower              | Yes      | No comment.   |
| Western Power Distribution | No       | <p>We do not agree that the red-lining delivers the proposed solution.</p> <p>Our suggested changes are detailed below.</p>   |
| E.ON Energy Solutions      | Yes      | <p>Minor point the red lined draft has a typo at 1.3 ..... In which case, the processes set out in <i>BPSC502</i> for data estimation shall be followed.....</p>  |
| Npower Group               | Yes      | We agree with the draft redlining for CP1483.   |

## Question 3: Will CP1483 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7   | 0  | 0                  | 0     |

### Responses

| Respondent                 | Response | Rationale   |
|----------------------------|----------|---|
| SSE Energy Supply Limited  | Yes      | In terms of our current and future portfolio we anticipate minor and acceptable impacts.  |
| TMA Data Management Ltd    | Yes      | Our procedures would be affected by the implementation of CP1483.   |
| IMServ Europe              | Yes      | <p>A definitive view of the impacts on us as HHDC is unclear until further clarifications on some of the requirements are obtained, again please see our comments on the redlined text.</p> <p>However, the likely impacts could include:</p> <p>Revised Working Instructions</p> <p>Training</p> <p>Development and Testing</p> <p>Additional staffing</p> |
| ScottishPower              | Yes      | <p>Email update by supplier would incur minimal impact and cost.</p> <p>If the system change to data flows solution is used, internal processes will be required to be amended to ensure compliant as well as associated training for impacted business areas.</p>  |
| Western Power Distribution | Yes      | It could impact us if our MOA now decided to take in excess of two working days to confirm that the appointment details are correct and consistent otherwise no impact.   |
| E.ON Energy Solutions      | Yes      | We anticipate impact of the change to be minor in scale   |
| Npower Group               | Yes      | We have identified that some system and process changes will need to be made in order to implement CP1483. The system changes will be to allow visibility of the required data within the Agent Appointment flows. We believe that this will create minor process changes that will lead to be added  |

| Respondent | Response | Rationale                    |
|------------|----------|------------------------------|
|            |          | into any future LWP updates. |



## Question 4: Will your organisation incur any costs in implementing CP1483?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 4   | 3  | 0                  | 0     |

### Responses

| Respondent                 | Response | Rationale  |
|----------------------------|----------|--|
| SSE Energy Supply Limited  | Yes      | Insignificant costs, e.g. documents, briefings, etc.   |
| TMA Data Management Ltd    | Yes      | There would be minimal costs associated with the implementation of CP1483.   |
| IMServ Europe              | Yes      | <p>Yes, although this is difficult to quantify. It is hoped however that some of the costs of implementation would mitigate the extensive costs in time and effort currently being incurred in having to address the weaknesses and issues with the current process.</p> <p>As this Change proposal currently stands, if we were to fully adhere to these requirements our development / ongoing costs could be significant, to the point where we couldn't offer a viable commercial service.</p> |
| ScottishPower              | Yes      | <p>Email update by supplier would incur minimal cost.</p> <p>If the amendment to the data flow solution is used, potential costly system changes will be required which have yet to be impact assessed.</p>  |
| Western Power Distribution | No       | No comment.  |
| E.ON Energy Solutions      | No       | No comment.  |
| Npower Group               | No       | Although implementing CP1483 will incur some minor process changes, we do not think there will be any financial implications for Npower to implement this change.  |

## Question 5: Do you agree with the proposed implementation approach for CP1483?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6   | 1  | 0                  | 0     |

### Responses

| Respondent                | Response | Rationale   |
|---------------------------|----------|---|
| SSE Energy Supply Limited | Yes      | We do not see any reason to delay implementation beyond November 2017.  |
| TMA Data Management Ltd   | Yes      | The proposed implementation date of Nov 2017 is possible.   |
| IMServ Europe             | No       | <p>Again, pending clarification of our comments below, it may be possible for us to consider a June implementation.</p> <p>Our experiences over the last 9 months have highlighted process gaps/weaknesses, a lack of understanding by the relevant parties and a lack of ownership. This has resulted in ongoing frustrated conversations and a high risk to settlement of duplicate data submission as, no site has yet been successfully registered. It should also be noted that by nature, these sites will typically be of a higher level of consumption. We therefore propose the following:</p> <ol style="list-style-type: none"> <li>1) A workshop hosted by ELEXON for parties involved in the process to identify gaps and issues encountered by all with a view to further amending the process.</li> <li>2) Consideration of the implementation by Elexon of a central register of such sites detailing the primary and secondary MSIDs and the relationships between them. Suppliers would notify Elexon of such sites who could then share this information to pertinent parties on a need to know basis. Elexon may well already know of some of these sites since they may have metering dispensations active.</li> </ol> |
| ScottishPower             | Yes      | ScottishPower would be happy to proceed with either the June or November 2017 implementation dates.   |

| Respondent                 | Response | Rationale   |
|----------------------------|----------|---|
| Western Power Distribution | Yes      | As we do not require any system changes we could implement at the earlier date of 29th June 2017 if required. |
| E.ON Energy Solutions      | Yes      | We are comfortable with the proposal to implement the change for the 2 <sup>nd</sup> November 17 release.     |
| Npower Group               | Yes      | Yes, we support the implementation date of 2 <sup>nd</sup> November.  |

**BSCP550**

| Respondent    | Location                             | Comment  |
|---------------|--------------------------------------|--|
| IMServ Europe | Page 6                               | <p>Could the paragraph commencing 'Where a new or modified allocation schedule...' be clarified? Is this trying to say that where the allocation between the Primary + Secondary MSIDs is wrong this cannot normally be corrected but where the total value is wrong this can be corrected (by following the estimation rules in BSCP502) therefore this can be retrospectively applied. Might be worth further clarification</p> <p>Also should approved Trading Disputes not allow for retrospective corrections? If so maybe text such as 'Except for Approved Trading disputes...' should be included?</p>   |
| IMServ Europe | 3.1.9 and a number of other sections | Should the sentence '(HHDC and Secondary Supplier(s) should receive the initial Allocation Schedule by Gate Closure)' now be removed throughout the document since this CP proposes that this takes place at least 5 WD before the appointment starts?   |
| IMServ Europe | 3.1.10                               | How does the HHDC know to expect an Allocation Schedule, what tells them this is a shared site?  |
| IMServ Europe | 3.1.19                               | Is this step required at all now, since all the previous activities must have been completed by this point (i.e. Gate Closure)?  |
| IMServ Europe | 3.2.1.10                             | <p>This step states that the primary Supplier sends the HHDC appointment details. In this scenario, I thought it worth pointing out that it is possible that the HHDC has already been appointed by that Supplier under a standard none shared arrangement for a prior period. Is it intended that the Supplier has to send a further appointment, with an effective date aligned to the start date of the shared arrangement?</p> <p>Where this new start date &lt; 5 WD in the future, if the HHDC is unaware it relates to a shared arrangement, they will typically just accept the appointment. Therefore, in order to deliver the intention of the CP, the HHDC must know that the site is shared before any D155s are sent.</p> <p>However, if the HHDC is aware that the incoming appointment does relate to a shared site, the appointment would be rejected and the existing</p> |

| Respondent    | Location        | Comment   |
|---------------|-----------------|---|
|               |                 | appointment would continue, is this correct?  |
| IMServ Europe | 3.1.8 to 3.1.14 | <p>Please can this be clarified.</p> <p>If the Primary Supplier registers both primary and secondary MSIDs 5 WD before Appointment Start Date and the Secondary Supplier also has to give 5 WD notice before Appointment Start (3.1.14), how does this work?</p> <p>Step 3.1.11 has the Primary Supplier notifying the Secondary Supplier who the Agents are within 2 WD of 3.1.8. Surely this then doesn't allow the Secondary Supplier enough time to also give 5 WD notice when sending in their appointment.</p> <p>I guess this issue is also present under other registration activities.</p> |
| IMServ Europe | 3.2.3           | In the real world, on change of Supplier (either Primary or Secondary) it is entirely likely that this would also trigger a co-incidental change in Allocation schedule – this doesn't seem to have been captured?  |
| IMServ Europe | 3.2.6.9         | <p>Does the primary Supplier only optionally need to terminate the HHDC appointment where a site reverts from shared to single Metering System so the words 'as required' could be added? The Supplier may want his Agent's appointment to continue.</p> <p>This also triggered me to think of the scenario where a Shared Metering System changes (say) from 2 Secondary Suppliers down to a single Secondary Supplier, has this process been covered?</p>   |
| IMServ Europe | 4.6             | <p>A number of similar points follow, some of which could be resolved by adding in a phase such as 'The validation to be undertaken, on a best endeavours basis, by an HHDC shall be as follows:'</p> <p>I will describe why below.</p>   |
| IMServ Europe | 4.6.1           | Obviously the HHDC can only do this if they have received a D268 on all the MPANs within the shared arrangement   |
| IMServ Europe | 4.6.2           | How is this expected to be achieved?  |
| IMServ Europe | 4.6.3           | Given under the initial registration process the HHDC verifies that the same MOP has been appointed to each MPAN within a Shared  |

| Respondent                 | Location  | Comment  |
|----------------------------|---|--|
|                            |   | <p>arrangement, are you suggesting that the HHDC has to continue to check this during the entirety of their appointment as HHDC, since HHMO appointments can change over time?</p> <p>By implication the HHDC then has to monitor D148s from Suppliers and the sender of every D268 we receive?</p> <p>Also, BSCP550 then doesn't state what the HHDC should do where should a discrepancy is found</p>  |
| IMServ Europe              | 4.6.4   | Where an appointment is < 5 WD in the future, this step implies that such an appointment is rejected? If so this should be described in more detail under the interfaces and timetable sections, including the information required to be sent back to the Supplier(s) from the HHDC.  |
| IMServ Europe              | 4.6.5   | What is meant by 'associated maintenance rules'  |
| IMServ Europe              | 4.6.8   | <p>I can understand why it might be sensible to assume that setting meter and pulse multipliers to zero will reduce the risk of potential double counting data and lead to less errors in Settlement data but this is too prescriptive and somewhat clumsy.</p> <p>Most modern meters do not store values in pulses so setting the pulse multiplier to zero would be irrelevant.</p> <p>If Suppliers and their HHDC take equally effective but alternative approaches to ensure data accuracy this should be sufficient. How this is achieved isn't important providing it is a robust, auditable, accurate approach.</p> <p>If the HHDC is collecting data under the Primary MPAN correctly and has a valid Allocation schedule, what relevance does a pulse multiplier necessarily have on the values submitted under the Secondary MPAN(s)?</p> |
| Western Power Distribution | New red-lined paragraph at the end of Section 1.2 | <p><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 best 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></p>  |

| Respondent                 | Location                              | Comment   |
|----------------------------|---------------------------------------|---|
| Western Power Distribution | Sections 3.1.9, 3.2.1.11 and 3.2.1.16 | Reinstate process step but remove "HHDC" from the "From" column |