Smart Meter Technical Details Consultation – Collated Responses

Company	No BSC Parties / Non-Parties Represented	Role of Parties / Non-Parties Represented
Ovo Energy	1/0	Supplier
Western Power Distribution	4/1	Distributor/MOA
Siemens Metering, Communications & Services	0/1	MOA
TMA Data Management	0/1	NHHDC/NHHDA/HHDC/HHDA
Gazprom Energy	1/0	Supplier
Haven Power	1/0	Supplier
Total Gas and Power	1/0	Supplier
EDF Energy	10/0	Supplier
Enterprise Managed Services (E&CS)	0/1	MOA
ScottishPower	1/1	Supplier/Supplier Agent
Lowri Beck	0/3	NHHMOA/NHHDC/NHHDA
Northern Powergrid	2/0	Distributor
RWE npower	6/0	Supplier/Supplier Agent
Electricity North West	1/0	Distributor
Salient Systems	0/1	NHHMOA/NHHCD/NHHDA/HHMOA/HHDC/HHDA
SmartestEnergy	1/0	Supplier
SSE Energy Supply	1/1	Supplier/Supplier Agent
British Gas	1/1	Supplier/Supplier Agent
E.ON	1/	Supplier/Supplier Agent

2.1 Do you agree with the high level proposal for the maintenance and distribution of Meter Technical Details set out in section 2? Please provide the rationale for your response	
Ovo Energy	Ovo were expecting DCC to take a more prominent role in the meter exchange process and the transferring of read and MTD data to the respective agents. We envisaged that the MOA would liaise with the DCC to configure the meter and that the supplier would continue to receive data rather than become a prominent figure in the configuration and forwarding of details. There's a concern that smaller suppliers have far less MOA expertise than the larger suppliers and expecting these suppliers to adopt a system to provide meter data may be more problematic than it would be for larger incumbent suppliers. A number of these suppliers already have in-house systems, which are likely to be utilised in the same way under the new process, with just the MPIDs changed to reflect that the flows are triggered by the supply side. Our main concern is that processes that involve suppliers have historically lead to delays and out of date or incorrect data. This is a daily issue with the disputed reads and ET processes, as well as the poor data often found on ECOES and especially Xoserve, which can be traced to supplier updates (or the lack of them!). We have found the quality of metering data on Ecoes (which is MOA led) to be considerably better than Xoserve (which is supplier led) providing support that suppliers are not as consistent as they could be with ensuring the right data is processed and in the right format/timeframes. If suppliers are to be trusted to be integral to this process there needs to be stricter regulation on the timescales involved and the data produced. The CoS smart process is integral to proving to customers that smart metering provides a superior switching process. However, if it leads to billing delays and incorrect data, any initial customer support for smart will soon erode and energy suppliers will be viewed with even greater distrust than they currently are.
Western Power Distribution	Yes, in part. These proposals seem sensible for metering systems that are remotely configurable by a supplier. However, any party requiring Meter Asset data should be sent it directly by the MOA as this ensures they see the definitive data as held by the owner of

	that data.
Siemens Metering Services	Partially agree. This change should only include smart meters. It should not include remotely configurable Automated Meter Reading (AMR) meters (as suggested in Section 2.3). See more detail in response to Question 2.4 below. There are arrows missing from the diagram in section 2.3. This should show the provision of Config Details (and a copy of the Asset Details) by the Supplier to the MOA to update the MOA of a remote configuration. This is referred to in section 2.5 bullet point 3 and is referred to in the response to question 2.5). Do not agree with the proposal that the MTD should be distributed by the Supplier after a smart meter has been installed. Do not agree with the proposal that the MTD should be distributed by a Supplier on COS and change of agent. The reasons are included in the response to Question 2.6. There is a conflict in description of asset data in the consultation document. It should always refer to 'Asset Details' rather than 'Meter Asset Details' as it is sometimes referred.
TMA Data Management	Yes
Gazprom Energy	Yes. It would speed up the change of supplier process as the supplier can liaise with their agents quicker and determine flows that are missing from their own agents and forward accordingly. Also allows the possibility that AMRs on CoS can be obtained quicker allowing for more accurate bills.
Haven Power	No. To change the fundamental principles behind the transfer of Metering Data would lead to unnecessary complication during the rollout stage. Systems and process would have to accommodate two separate work streams for SMART and non-SMART meters. In order to avoid this, we would suggest that during the rollout period the maintenance of all metering information should remain with the MOP with an obligation be placed upon the supplier to inform the meter operator of any configuration changes. We recognise that some of the responsibility of the meter operator in terms of physical configuration of a meter will be eroded throughout the SMART rollout. However, to change the method with which standing data is held at a time of significant change carries a significant risk, a risk that won"t necessarily offer any significant advantages. We feel that changes such as these should be made once the dust has settled and the mechanics of the industry post SMART rollout are much clearer.
Total Gas and Power	[Generally agree but believe proposals should be considered as part of wider changes led by DECC and Ofgem's Smarter Markets Team, particularly in terms of joint gas and electricity activities.]

EDF Energy	EDF Energy agrees with the high level proposal for the maintenance and distribution of Meter Technical Details as detailed in the consultation document. The implementation of smart metering, and the introduction of the DCC as a conduit of information to and from the smart meter, will enable Suppliers to have direct control over the way that their customers' meters operate for billing and settlement purposes. Under the proposed operating model for smart metering, Suppliers will have direct responsibility for how their smart meters operate; whereas for legacy metering they have accountability, but the actual responsibility lies with the Meter Operator. EDF Energy believes that the high level proposals are reflective of this fundamental change in the way that meters and metering data will be managed under smart metering. In our opinion they also represent an efficient way for managing metering data by ensuring there is no unnecessary data replication across market participants' systems; we also believe that it should be possible to achieve the desired outcomes without making significant changes to participant systems as the data being sent and received is largely the same, it is only the source of individual aspects of the data that is changing.
Enterprise Managed Services	Agree in principle that there is no impact to Mop as responsibility for updating DC will sit with Supplier.
ScottishPower	We support the view that a Supplier has responsibility for setting and distributing configuration details. Whilst we consider it essential that the MOA provides asset details upon job completion (i.e. installation, exchange or removal), we do not think they should retain responsibility for maintaining smart asset details. Instead, the responsibility for maintaining and distributing smart asset details on an enduring basis should lie with the Supplier. Nonetheless, the Supplier may choose to discharge such obligation via contractual arrangements with an agent. The DCC has an important role to play in terms of making available asset and configuration data. It is essential that the scope and content of the DCC inventory and the associated services are defined such that they allow for the simplification of industry processes, minimising the exchange of data between organisations. The data and services made available by the DCC will have a significant bearing on the requirements for data exchange on Change of Supply. Our preference is for as much asset data to be held centrally as is possible.
Lowri Beck	Lowri Beck agrees with the high level proposal for the maintenance and distribution of the Meter technical details, however we believe that the Supplier should distribute the Meter Configuration Details flow to the MOP as well as the DC and LDSO. One of the main reasons for receiving the flow would be to allow the MOP to be able to configure the meter locally onsite without having to request the supplier for the tariff / configuration details prior to the site visit. This can also be used for maintenance or emergency callouts with a 3 hour leading time.
Northern	We are in agreement with the high level principles relating to the maintenance and distribution of meter technical details. However

Powergrid	looking at the meter technical details it is unclear how such important changes as firmware version and updates to these will get captured and recorded.
RWE Npower	We agree in principle, but believe that the current Meter Technical Details flows and/or smart equivalent flows should always be sent to the MOP. There is no reasonable reason for changing the obligations for forwarding the D0150 (or equivalent) from the MOP to the Supplier. Further clarification is also required on whether all AMR meters should be treated as SMART (or at least the RCAMR and RCAMY versions) or not.
Electricity North West	Electricity North West agrees with the proposal for the maintenance and distribution of Meter Technical details set out in Section 2. As this meets the requirements of the Legacy System changes (Enduring) document which came out of the Smart Metering Business Process Design Group. The MOA will be responsible for the physical attributes of the meter and provide this information to the Supplier, and the Supplier is responsible for the configuration data and distributing the asset data and configuration data to the DC and LDSO, we accept that the new dataflows will not be sent as a pair and will be sent independently of each other. We assume that as the Supplier is responsible for distributing the data that they will have validation procedures in place to prevent discrepancies.
Salient Systems	No, we do not agree with the high level proposal for the maintenance and distribution of Meter Technical Details. We do recognise that Suppliers, either directly or through authorised agents, will operate business channels to the SMS via the DCC service provider. At a high level the required Supplier channels can be functionally classified as either business process enabling or business process operating. While we also recognise the synergies and inter-dependencies between suggested channel types we feel that such classification distinction is critical in order to illuminate particular data management process imperatives attached to the underlying data implicated at channel types. SMS Enabling channels from Supplier to SMS will accommodate the implementation at the SMS of the supplier nominated set of available functional components that will support their particular business operations requirements and objectives. Commissioning or reconfiguring activities at the SMS will be handled over an Enabling channel type. Operating channel types will provide access to the data available at enabled facilities at the SMS – register readings, customer messaging data, pre-payment related data etc., the data that will be used/modified by a Supplier to continue to achieve his business offer to the consumer and to meet his industry settlement requirements. From a data management process perspective the issue of appropriate custodianship of SMS operational data is straightforward – the

	Supplier – who will use the data to support his own business requirements and responsibilities. However, proposal positioning of the Supplier as the custodian of enabled MTD is more problematic. As always, and particularly at distributed business process and data architectures, a pragmatic approach is encouraged in order to identify the appropriate custodianship role and responsibility holder for data. The results of evaluation of where data is created, validated, applied, maintained and used, balanced by assessment of the consequences of it not being in the right place at the right time, will typically drive out pragmatic positioning of data custodianship and resolution of data sharing/distribution decisions. Our objections to the proposal are entirely based upon our assessment that MOA should continue to exercise the custodianship role for MTD data, including configuration details. Positioning Supplier as custodian not only introduces the requirement for significant (rather than 'minimal') industry process and data distribution change across multiple parties but also introduces significant risk to end-to-end business process stalls and breakdowns at SMS site visit change events – an issue anticipated within the proposal discussion at 2.1. Consequential change requirements upon the persisting industry processes that will fall out of the proposition that MOA remains custodian for all MTD will obviously remain. However, such consequences, we believe, will be restricted to Supplier<>DCC, Supplier<>MOA and (consequential) DCC<>MOA interfaces. Required modifications would avoid disruptive change across the board and would assure a more consistent set of processes continue to persist across the supplier hub. The changes required would also, in our view, better reflect the domain skill and experience sets in play at resources at either side of industry process interfaces. For the avoidance of doubt, our perceived requirements for minimal change that will continue to assure MOA custodianship of MTD do not preclude the Supplier having direct Enabling channel(s) to DCC services. Rather, they suggest only that in all instances where change is required at SMS configurations then the MOA will be in the loop - whether change is planned in advance by Supplier and communicated to DCC via MOA or initiated in near real time by supplier with DCC directly. Assurance mechanisms required here, we believe, will not be onerous upon Supplier, DCC or MOA.
SmartestEnergy	Yes, in summary smart technology provides the supplier more direct control of the meter and importantly the industry process needs to reflect this. This proposal provides Suppliers with the increased control and accountability of meter configuration data, whilst re-shaping the MOA responsibilities to the physical meter asset only.
SSE Energy Supply	Whilst we agree with the general principle of the proposed change, we would not rule out amending the existing D0149/D0150 flows with optionality which we believe is still the least change and impact to systems and processes for all impacted parties.

	We would also have welcomed the appropriate changes to BSCPs for the D0149/D0150 approach to support Smart Meter Technical Details. This would have enabled an evaluation by parties to fully understand the implications of the changes for both approaches.
British Gas	No, we would prefer to see the current arrangements maintained whereby the MOA retains responsibility for the maintenance and communication of MTD. The MOA has the necessary experience and expertise to continue to fulfil this activity on behalf of suppliers. This is not to say that some suppliers may not want and should not be precluded from taking responsibility for distributing MTD. Perhaps the compromise is for suppliers to assume this responsibility but be permitted to discharge it to its appointed MOA. This response is based upon an assumption that when registration, data processing and aggregation is centralised into the DCC 2-3 years post the initial go live event that the MOA data responsibilities will also transition to some kind of centralised data repository, potentially within the DCC registration systems. We have modelled the options presented in this paper earlier in the year and believe that the current proposal would require significantly more effort to implement than the option where the MOA retains responsibility for MTD. Assuming that this is the case, we would need to make significant changes to support this at that time and therefore referring to the change principle outlined in 2.2 we believe retaining the MOA as responsible for maintenance and communication of the MTD is the "minimal change" option.
E.ON	Yes we support these proposals as the sensible progression of responsibilities under a smart regime.
2.2 Do you agree that the proposed changes are required for the start of the mass smart roll-out in 2014?	
Ovo Energy	It would seem prudent that any changes are in place for the mass roll-out. The changes need to be agreed soon to provide sufficient notice to change the relevant processes and systems.
Western Power Distribution	Yes
Siemens Metering Services	Yes
TMA Data Management	Yes
Gazprom Energy	Yes
Haven Power	We feel that this depends on how much differentiation this introduces. If the changes are implemented early then the period of time two sets of processes will run concurrently will increase, as will the opportunity for confusion and error and the costs incurred. A

	better approach may be to implement this when the majority of meters are smart or to look at simplifying the changes proposed.
Total Gas and Power	
EDF Energy	As detailed in our response to question 1, EDF Energy believes that these changes result from the change of data ownership that occurs with the implementation of the DCC, therefore the changes are required to coincide with the implementation of the DCC. If the proposed changes are not implemented by this time then an interim arrangement will be required to facilitate the communication of configuration information, from the Supplier to the MOA, to be sent out on dataflows. Either an industry standard dataflow would need to be developed to support this (which would then be disposed of as soon as the enduring changes are implemented) or this would be a manual transfer of information, which is then less robust, more prone to error, and cannot be used at any sort of scale. On this basis EDF Energy believes the implementation of the proposed changes should be aligned with the implementation of the DCC.
Enterprise Managed Services	Yes
ScottishPower	We believe that the changes should be in place to support the mass roll-out and any testing activity considered necessary by the UK smart programme.
Lowri Beck	Lowri Beck agrees that the changes are required for the start of mass roll-out in 2014.
Northern Powergrid	We believe the changes should be in place before mass roll-out. This is with the view that completing these changes alongside mass roll-out is open to risk due to the scale of the changes involved and should be tackled separately to ensure thorough testing and implementation can be completed.
RWE Npower	Yes. We agree that changes are required for the start of mass rollout but we can see benefits in implementation as early as practical across industry participants
Electricity North West	It would be sensible to have these proposed changes implemented by mass roll out in 2014, so that majority of the Smart Meter MTD's are sent by the Supplier and we do not have undertake any transition mid way through the mass rollout from legacy solution to the new enduring solution MTD's.
Salient Systems	Yes, the final changes agreed will be required for roll-out in 2014.

	However, as per above, we do not agree that the current proposal represent available 'minimal change' option. Interestingly, we note that Elexon's earlier presentation to SMRG Working group 4 (16/5/2012, WG4 papers and minutes) of alternate arrangements suggested a more pragmatic approach to meeting minimal change requirements – this earlier proposal should be pursued and extended in our view. There is also significant risk attached to delivery of current proposals by all parties impacted. Industry's capacity and track record for delivering significant change to demanding timescales is poor. Observations included at proposal 2.2 that registration will be subsumed at some point by DCC along with, possibly, centralised DCDA services would tend to reinforce objections raised concerning the current proposed scope of minimal change to interim processes. Any future initiatives and schedules for delivering integrated facilities at DCC will be unavoidably disruptive in their own right. The potential for DCC to reduce development costs by adopting best of breed components from existing industry systems in order to deliver integrated services will be better served if data management process principles are adhered to as far as possible within any interim solutions.
SmartestEnergy	Yes, although it may be prudent to make provisions to pilot any new process ahead of roll out to avoid any risks once this has commenced.
SSE Energy Supply	Yes, SSE agrees that the changes are required for the start of the mass smart roll-out, however, this remains dependent on the industry wide agreed date for roll-out.
British Gas	Yes, agree that one of the options needs to be delivered in readiness for mass roll out.
E.ON	Yes or sooner to support foundation roll out of meters.
2.3 Do you agree with the proposal to progress changes in support of Non Half Hourly settled Metering Systems in the shorter term and consider the processes for Half Hourly settled Metering Systems serviced by the DCC as a subsequent change?	
Ovo Energy	As this project is specific to NHH domestic and SME customers, it would appear a sensible approach to concentrate on a NHH solution for these customers and look at half hourly settlement as a subsequent change.
Western Power Distribution	This is really dependent on Suppliers' views as to when they may start to settle smart meters on a HH basis. We don't want to be playing catch-up later by not considering the use of smart METD in a HH environment.
Siemens	Agree that Half-Hourly settled Metering Systems should be excluded at this point.

Metering Services	However, we believe that Non-Half Hourly settled AMR Metering Systems should also be excluded. See more detail in response to Question 2.4 below. The scope should be limited to Smart Non-Half Hourly settled Metering Systems.
TMA Data Management	The NHH and HH processes are significantly different. Smart metering has a big impact on NHH; it would not have such an impact on HH processes. The D0268 is perfectly adequate to provide the metering information and the current processes such as COS are much more efficient in HH than in NHH. It makes sense to consider these two areas separately.
Gazprom Energy	Yes. HH is already more efficient and data is considered to be generally more reliable than NHH metering systems. With the increase in smart roll out, this process should be considered as a priority.
Haven Power	Yes we agree with the proposal, adding another layer of complexity at this time would be inadvisable.
Total Gas and Power	
EDF Energy	EDF Energy agrees that only the Non Half Hourly changes should be progressed in the shorter term. The requirements for NHH smart metering have clarity based on the information available from the DECC Business Process Design Group (BPDG), and the wider DECC smart metering programme, in regards to the functionality of the DCC and the roles that market participants will have in regards to management of the meter via the DCC. While there is a clear aspiration to settle smart meters on a Half Hourly basis, it is not yet clear exactly how this would work, what data would be required for this and how this might differ from current HH arrangements, which are designed for metering points with very high consumption and need a specific level of assurance that reflect the impacts on settlement processing. With specific reference to metering data, it is not clear what information, currently captured on a D0268 dataflow for HH meters, might be required for HH settlements processing where a smart meter is installed. We believe that it should be possible for the NHH changes to be designed in such a way that they are not precluded from supporting HH functionality. Specifically we believe that it should be possible to use the proposed Meter Asset Details flow for both NHH and HH smart metering processes, with different configuration flows depending on whether the meter is being settled on an NHH or HH basis. However, as above, this is subject to determination of the data required to be able to settle smart meters on an HH basis, and who the owner of that data will be.
Enterprise Managed Services	Yes
ScottishPower	We support the pragmatic approach taken in developing this consultation. However, the smart meter technical details should be

	designed such that they provide sufficient information to support Non-Half Hourly and Half Hourly Settlement.
Lowri Beck	Lowri Beck agrees with proposal to only implement changes to Non Half Hourly to ensure this is live for the start of mass rollout, any changes made to Half Hourly and time required to review the impacts could delay the implementation.
Northern Powergrid	Yes in the interim we are in agreement with this.
RWE Npower	Yes – We support the proposal to progress NHH settled metering systems, and also support the approach for HH Metering Systems to be serviced by DCC, however prior to full commitment detailed implementation timescales would be required.
Electricity North West	We do agree with the proposal of supporting NHH meters in the shorter term and consideration for them being HH settled to be a subsequent change. The NHH solution should be in place by 2014 and it is expected that the HH settled solution is developed and understood at the earliest opportunity so that Suppliers wanting to settle on HH basis will have the processes in place to do so. From NHH settlement perspective Distributors need to consider the impact of 'De-Linking' solution to DUoS Billing be it against all NHH metered customers or specific to a Smart Meter being installed. The majority of the NHH AMR meters have been installed using existing processes and as Suppliers have an obligation to have all AMR meters installed by April 2014. The current P272 modification will determine these to move to HH site specific settled. There is an issue with the AMR MTC codes in that they are specific for NHH so an MTC is required for HH AMR meters to differentiate whether they are NHH or HH settled.
Salient Systems	NHH SMS processes are an obvious priority, but there is also significant risk to ignoring HH issues completely. At 2014, and soon thereafter, there will be both elective and mandatory candidate NHH SMS metering systems that will move to HH settlement and HH industry processes. This will reinforce the requirement for as much consistency as possible between Supplier, MOA, DCC exchanges across NHH and HH processes and operational procedures. In our view it cannot be assumed that once an SMS moves to HH settlement then the Supplier will no longer wish to interact with the SMS in an 'Enabling' capacity directly via the DCC. If our assumptions are born out then the risks attached to proposed NHH regimes may infect HH work management events. The potential for DCC services against mandated HH SMS, where proving tests will be required, reinforces the need to ensure that MOA is positioned as custodian of all relevant MTD and auxiliary data.
SmartestEnergy	Yes, we believe a separate review should take place for the business market, including analysis on how that would interact with the DCC in future.
SSE Energy Supply	These new processes and flows should only apply to the NHH metering systems at this stage. We believe that there is a separate industry group (PSRG) considering the process where Metering Systems is HH settled.

British Gas	Yes
E.ON	Yes
2.4 Do you agree that the new processes and flows should apply to all remotely configurable Non Half Hourly Metering Systems? If not, please provide an alternative differentiator together with your rationale.	
Ovo Energy	If this process becomes the agreed course, it should apply to all remotely configurable non half hourly metering systems. However, this process involves DCC and there is therefore a contradiction as SME meters will not be mandated to use the DCC
Western Power Distribution	As the new flows do not contain any communications data we think they are suitable for metering systems where communication with the metering system is operated by the DCC. If communication with a metering system is operated by a different party then further information will need to be transferred when, for example, CoS occurs. Existing legacy flows should therefore be used for these meters.
Siemens Metering Services	No. This should not apply to AMR Metering Systems. The scope should be limited to Smart Non-Half Hourly settled Metering Systems. The changes should only apply to interoperable meters where core functionality is standardised where remote configuration is by standard process whatever the meter type. It should not apply where interoperability is by provision of communications details alone as in AMR and HH Metering Systems.
TMA Data Management	Yes, new processes should only apply to remotely configurable NHH metering systems, using the meter capability.
Gazprom Energy	No comments
Haven Power	We do not feel that a differentiator is appropriate here, it would be far better to apply the changes to all Non Half Hourly Metering Systems. The changes allow for Meters that are not remotely configurable and there would be no need to maintain separate processes (or potentially separate systems).
Total Gas and Power	
EDF Energy	EDF Energy does not believe that the new processes should apply to all remotely configurable NHH Metering Systems, and specifically not to AMR meters with that functionality (i.e. those with a meter type of RCAMR). The key distinction between Smart Metering and AMR is the parties that are able to communicate with and manage the meter. For Smart Meters this will be Suppliers who will manage their customers' meters directly via the DCC, who provide the communications

	link to the meter. For AMR metering, the communication with the meter can only be undertaken by the Meter Operator, who is also the owner of the communications link to the meter and often has a direct contract with the customer to provide metering services. Without a more fundamental change to the AMR processes, Suppliers are not able to directly configure meters, and there is no indication they would want to have this ability for this section of the market. On this basis we recommend that responsibility for the configuration of AMR meters remains with the Meter Operator, and that the new flows and processes detailed in the consultation should only apply to smart meters. We would additionally note that the processes for remote management of non-domestic smart meters that are 'opted-out' of the DCC have yet to be defined in any detail, so it is not clear what the operating model and, specifically, what roles and responsibilities will be for these customers. We believe that they must follow either the proposed processes for smart metering managed via the DCC, or the current AMR processes where configuration data is owned by the Meter Operator.
Enterprise Managed Services	Yes
ScottishPower	The proposed processes should apply only to SMETs compliant meters as they will be easily identifiable as remotely configurable Non Half Hourly Metering systems. The existing processes for the exchange of meter technical details should remain for AMR meters, dumb meters and Advanced Domestic Meters that are not SMETs compliant.
Lowri Beck	Lowri Beck agrees that the new processes and flows should apply to all remotely configurable Non Half Hourly Metering Systems.
Northern Powergrid	Yes we are in agreement
RWE Npower	No - AMR metering needs to be included in this if it is not using DCC.
Electricity North West	The new processes and dataflows should be used for SMETS compliant Smart Meters that are installed. As previously stated in question 2.3 the majority of NHH AMR meters have been installed using existing processes it would not be practical to start using the new processes and flows.
Salient Systems	Yes, and reinforces the requirements for MOA's to have available a complete set of MTD for both AMR and SMS, alongside interfaces to DCC services and DCC licensed HHT components (DLMS/COSEM client). MOA's will channel AMR change requests through in

	house processes and head end services, SMS requests through DCC services with HHT facility backups to support on site issue investigation/resolutions and system proving prior to installations/mobilisations.
SmartestEnergy	Yes
SSE Energy Supply	These new processes and flows should apply to those SMETS meters operated by DCC and not to the EDRP, AMR or the Foundation (ADMs) meters.
British Gas	Yes
E.ON	Yes
2.5 Please provide feedback on the features of the proposed solution set out in Section 2.5	
Ovo Energy	We believe it's important that any reads taken on site by the MOAs should not be for contingency purpose and there should still be a mandatory requirement for these to be provided to the NHHDC. It would therefore follow that the MOA should continue to provide the initial reading for an exchange, which would also provide a sanity check of the reading data being provided by the meter. As a supplier we are supportive of the MOAs receiving the Meter Configuration Details as we believe this provides a definitive view for any site visits, especially any emergency work that may not be booked by the supplier
Western Power Distribution	Feature 1. We believe it would be good practice for MOA to always capture a reading as a contingency. Feature 8. Bilateral arrangements are probably fine for big suppliers and their MOA's but this may force smaller participants to have to "fit in" with arrangements over which they have little control. Therefore the views of the smaller participants should be key as to whether or not a standard flow is desirable.
Siemens Metering Services	Section 2.5 Bullet point 1) and 2) We believe that it should be mandated for an MOA to take start readings for a smart meter and provide these to the Supplier. It would seem advantageous for the MOA to capture initial and final readings from smart meters and legacy meters. If the Supplier does not want to use these they can ignore them. An actual display reading at the point of installation of a smart meter is considered valuable for query management purposes as visits to site will be rare. This is also consistent with the requirements of bullet point 7) which requires the MOA to take readings. (Section 2.5 bullet point 3). We believe that it should be mandated that the Supplier will send the Meter Configuration details to the MOA.

	This approach is required for our preferred option for the COS/ Change of Agent process which we believe should remain unchanged so that they can work as today. (see response to 2.6) Also, - if the MOA needs to perform a site visit then it is necessary for the MOA systems to be configured to allow the MOA to carry out maintenance, fault investigation and capture the correct meter readings. - it would seem a detrimental move for those carrying out industry roles to not have the same configuration information for an asset. All parties are contributing to delivering a service to the end customer and a common view will facilitate this. [Query management, maintenance, fault investigation and correction]. - It important that the MOA, who is responsible under the ESQCR for ensuring that the metering equipment is suitable for its purpose, understands how the meter is being used. - As Supplier is sending the configuration data to the NHHDC and LDSO, sending it to the MOA should be uncomplicated. Section 5 Bullet point 8): We have yet to see if any additional data, such as data from the SMDG Logical Data model, relating to the configuration of a SMETS meter will need to be incorporated into configuration data flows. Having said that, it is clear that some SMETS meter configuration details will not be included. We have the same situation with Legacy assets today. We would expect these to be agreed between the Supplier and MOA in order to allow local configuration of a smart meter. This data is the same/equivalent to the configuration data that the Supplier will have to pass to DCC for remote meter configuration.
TMA Data Management	1) Yes. 2) The D0150 should be sent on removal of the non smart metering system by the MOA to the relevant parties, then the new meter asset and meter configuration flows (if used) should be sent by the Supplier providing the details of the newly installed smart metering system. That would ensure a split between non-smart and smart metering rather than use new smart flows for non-smart metering. 3) The MOA should receive the Meter Configuration details, the MOA is required to have a full picture of the metering systems on site, if the Meter Configuration details are not provided to the MOA, it will be missing part of that picture. 4) Yes in terms of keeping similar timescales. It is not clear why the transfer of asset details between the MOA and the Supplier should be left to contractual arrangements. It would make more sense to keep the MOA responsible for sending the Meter Asset Details (if adopted) than placing the obligation on the Supplier without a counter obligation for the MOA to provide that information to the Supplier. 5) Yes 6) Yes

	7) Yes 8)Yes 9) No. What should the NHHDC do if a version is not received, accept the highest version number irrespective of the full version history having been received? 10) Yes.
Gazprom Energy	The ability for the supplier to obtain their own remote readings on installation, CoS etc. is most welcomed. Meter configuration details should always be sent back to MOA for clarity and to ensure all agents updated at same time.
Haven Power	We have several observations on this section. Firstly we feel that the obligation for an MOA to take readings from the new meter should be mandated. If the MOA has to take a read for the old meter being replaced; it is not onerous for them to take a read from the new one once they have installed it – and it would also add integrity to the process. If communications cannot be established at the point when the meter is installed this read will be invaluable. We also feel that the Supplier should be required to send Meter Configuration Details to the MOA rather than this being treated as "optional". The MOA will need these details if a site requires a manual reconfiguration to ensure it is set up correctly. We feel that there needs to be some clarity around "disabled" meters and we would challenge why there will be no need for a Supplier to notify anyone when they use this process. We feel this is particularly important given discussions in the SMETS 2 consultation around allowing DNO"s to disable meters in certain circumstances. It needs to be explained how in the event of Supplier failure another party will be able to find out the meter is disabled (as opposed to broken), why it is disabled (debt, out of credit, safety etc.) and how to re-enable it. We would also question why items configured locally are not subject to a mandated industry flow. If this is not mandated there is the risk that the actual meter configuration will drift relative to the data held by DCC and supplier. A more broad observation is the complexity that the providing for meter asset details to come from the MOA and configuration details from the Supplier adds to the process. This means that there are two parties to chase for details instead of one and that this adds opportunities for confusion and delay which are detrimental to the smoothness of the process and ultimately the customer. It also means that a Supplier who is losing a customer is being relied upon to pass details in a timely manner, which could have its own separate complications.
Total Gas and Power	
EDF Energy	In regard to the features detailed in section 2.5:

	We agree that this is correct – specifically that Meter Operators should not be mandated to take a reading and that this should be by agreement with the Supplier. We agree that this is correct – we do not believe that it is necessary to have a 'legacy' flow to disconnect a 'legacy' meter; this also avoids the situation where market participants receive two flows with the same effective date (MSMTD) which could create flow processing issues for some flow recipients We agree that this is correct – in terms of the role that they play in the market, and specifically within settlement processes, there is no need for the MOA to store this data on an on-going basis for every metering system they are appointed to. We believe that this would lead to unnecessary data replication and associated costs in terms of managing the flows and associated processing exceptions, with no discernible benefit to the settlement process. This is especially the case where the MOA and the Supplier are part of the same organisation. We would support the optional provision of this data to MOAs by Suppliers where those parties feel that it would support their operational model, but we would strongly reject any attempt to mandate this information being sent. We agree that this is correct – the timescales defined within the BSC are driven by the requirements of the settlement process, where the Initial Settlement run occurs at 15 working days. There is no value to settlements in mandating shorter timescales, even though data should be easier to obtain and send in regards to smart meters. Suppliers may choose to place shorter timescales within their contracts with their Agents for operational purposes, but there is no settlements driver to mandate shorter timescales than exist currently. We agree that this is correct – this is consistent with a low change approach and the MOA remain the owner of the asset data for smart metering. We agree that this is correct – this is consistent with a low change approach and the MOA remain the owner of the asset data for smart metering. We agree that this is correct - however we believe that clarification is required in regard to how energisation/de-energisation processes will work in relation to the BPDG processes for the DCC to ensure that the end to end process for smart meters is robust and fit for purpose. We agree that this is correct and that it would not be appropriate to communicate every configurable data item on a dataflow from Supplier to MOAs. We believe that it is likely that Suppliers will have a number of 'template' configurations for their customers which they will agree and share with their appointed MOA, and which might be communicated on a flow from the Supplier to the MOA (for

	example as part of the installation request). The MOA will then be able to understand the configuration settings required (in the case of the meter being locally configured by the MOA) based on the template ID . We agree that the Supplier should only send out the latest configuration of a meter where it has been configured more than once in a given day. However, we do not believe that a Configuration Sequence Number is appropriate. It is not clear where this data item would be sourced; it is not present in the meter (based on the SMETS 2 DDS documentation) and so would logically be created by the Supplier, in which case it will have no benefit to subsequent processing. Suppliers should have control over how they are configuring meters and should implement the appropriate measures to ensure that they only send out the appropriate data to other parties, in this case at the end of the day when they have full visibility of all of the changes made and know which ones need to be sent out. We agree that this is correct - the PARMS reporting measures risk to the settlement caused by the non-receipt of dataflows and the Supplier is now owner of data that drives settlement process. However it might not always be possible for the party reporting the missing data (such as the NHHDC) to know who they are expecting to receive the data from (MOA for legacy metering, Supplier for Smart Metering) and so report on the performance of specific parties against the required standards.
Enterprise Managed Services	Would MOA send Readings to Supplier or DC as is current practice? 3. We believe sending of config details to MOA by Supplier should be mandatory – so MOA has complete metering details. 10. Requires full impact assessment
ScottishPower	1 – Agree with proposed statement 2 – Propose that legacy details are always sent using existing data flows: e.g. on a legacy to smart exchange the MOP should send a D0150 with a populated removal group and a D0010(F) read to the NHHDC. 3 - Agree with proposed statement – we do not believe MOPs have a requirement to hold configuration data. 4 - Agree with proposed statement 5 –In line with our response in 2.1, we believe that the responsibility for passing all information resides with the Supplier who will have access to the master set of data required to inform the MAP of any smart asset changes. This responsibility shifts from the MOA to the Supplier. 6 – The responsibility for the update to ECOES for smart meters should shift from the MOA to the Supplier 7 - Agree with proposed statement 8 – Agree with proposed statement 9 – Agree with proposed statement DCs must be capable of receiving multiple configuration read sets in a day. 10 – Agree with proposed statement
Lowri Beck	Point 3. Lowri Beck and other independent Meter Operators believe that there are benefits of the MOA receiving the Meter Configuration Details data flow. Again one of the main reasons would be to allow the MOP to be able to configure the meter locally

	onsite without having to request the supplier for the tariff / configuration details prior to the site visit. This can also be used for maintenance or emergency callouts with a 3 hour leading time. Point 9. Lowri Beck believe issues may arise when processing multiple meter exchanges for a particular MPAN especially if there has been a meter advance on one of the meters that has been installed and removed on the same day. Currently when processing EAC/AA data this is based at day level rather than at daytime level, having multiple reads would affect how data is sent and processed through the EAC/AA client and in turn data generated on a D0019. A feature missing from the proposed solution list is a full meter removal without a replacement meter, currently a short D0150 is generated. Would this be a short Meter Asset Details data flow generated to the supplier?
Northern Powergrid	With regards to point 3 we believe that the MOA may need the details if they are required to attend site.
RWE Npower	Point 1 - We believe that the MOA should be mandated to take a reading when visiting site, this would confirm that the operative had visited the site and fulfilled LC12 obligations. We would not want these reads mandated for forwarding to DC for validation. Point 2 – Clarity is required regarding which flows are to be used. Is the D0150 to be used to remove the traditional meter and new flows used to install the Smart Meter? Point 3 – The MOA should receive the MCD flow as this will assist with the management of faults. Clarification is required regarding the necessity for NHHDC to receive both flows in all situations. If there is a change in energisation status for a site the Meter Asset Details wouldn't be required, only an updated Meter Configuration, so should the NHHDC be able to process that in isolation to allow validation of readings? Further details would be required regarding mapping a meter register ID with the physical display. Point 4 – We are happy with the proposed timescales however believe that MAD should be sent by the MOA and the MCD should be sent by supplier. The transmission of industry flows shouldn't be based on contractual agreements between parties. Clearly defined rules should be compiled for all circumstances. Point 5 – We agree that it should remain the responsibility of the MOA to send the D0303. Point 6 – We agree that is should remain the responsibility of the MOA to send the D0312. Could clarity be provided surrounding the Firmware updates changing SMETS versions.

	Point 7 – Clarity is required when there are communication issues and meter configuration details cannot be sent from MOA to supplier. Should the MCD also include the remote disablement status? We believe MOA and LDSO need to be informed of any remote disablement. Point 8 – There should be a mandated flow for Suppliers to notify MOA of meter configuration requirements and for the MOA to confirm these have been accepted. Point 9 – Any settlement affecting configuration changes should be limited to one per day to prevent potential loss of consumption data. Point 10 – We agree that changes will be required to PARMS serials to incorporate MOA responsibilities to the Supplier.
Electricity North West	The feedback regarding the features is as follows; <u>Feature 1</u> MOA's should always obtain a meter reading when visiting the site, just in case communications fail at anytime there is always an eyeball read to start at from the last site visit. Feature 2) – The legacy meter removal should come on the D0150 from the MOA to close down the legacy meter and processes. The new dataflows should only be used for Smart installation and removal. An assumption has been made that for the legacy meter the final read will be received as current process, for new Smart meter the DCC will provide invalidated reads to parties and the DC will provide a validated read. Feature 9) – We expect the volumes to be low therefore will process the latest version received on that day.
Salient Systems	Degree of optionality attached to particular actions will prove problematic in practice. On the basis that we significantly disagree with the proposal overall it will hopefully provide more useful feedback to outline the key elements of an alternate proposal that will deliver, we believe, a more manageable 'minimal impact' set of industry changes that will also reflect what will tend to happen in practice – particularly at large Supply companies with vertically integrated meter operations function, where much of the implicated Supplier requirements will tend to be addressed in any case! Key elements in brief:

	At all SMS 'enabling' interactions between Supplier and DCC, DCC will be informed of the associated MOA and will provide appropriate returns to the MOA in addition to returns to Supplier. Returns to MOA will include SMS configuration data and additional auxiliary MTD as will be necessary to enable the MOA to operate HHT based actions at the SMS site. HHT components required to be centrally sourced and licensed from DCC for integration with MOA HHT work management facilities. Returns to MOA from DCC will also include finals/initials where appropriate. The DCC will persist such update to the MOA in all cases where SMS 'enabling' actions are completed by DCC. Supplier requests for planned service to MOA may include coded details of 'enabling' required at SMS, to be interpreted by MOA and communicated to DCC in lieu of Supplier where Supplier wishes MOA to schedule activities with DCC. Published DCC User Gateway specifications will be helpful here. Alignment of MOA and DCC activity schedules and service availability will be required where field work is implicated in any case. Operationally, a key objective is better served – that of assuring that the MOA operates in a similar fashion, with respect to interactions with DCC, to that which will already be in play at existing MOA automated facilities to AMR systems. Additionally, MOA's will be better positioned to add service value to Suppliers, particularly to smaller Suppliers. Assurance of custodianship at MOA and onward data distribution by MOA of asset and configuration MTD and all associated change related data (readings) will result in less impact upon existing industry processes than will otherwise be the case. The confirmation of requirements for NHHDC, NHHMO interactions with DCC are currently unresolved at the programme level. The risk of assuming that no interactions will be required is considerable at this point. It is legitimate to propose and consider the benefits attached to interactions between both NHHDC and NHHMO with DCC where such proposed interactions will limit change at industry systems preparing for DCC go-live. As with any proposal for change there will be consequences and legitimate objections that can be raised around this and any other alternate proposal to achieve minimal change. We would hope that our suggested drivers for and constraints upon change will be aired across the widest range of stakeholders, particularly MOA's, alongside other proposal modifications arising from this consultation.
SmartestEnergy	We agree with the proposed solution in principle. However, this should be subject to further detailed end to end process review as we need to understand how the supplier to supplier communication would work, e.g. on an exchange of configurable details.
SSE Energy	The numbering of the feedback provided relates to the bullet points for the proposed solution.

Supply	1. We should mandate the MOA to provide (take) a reading on site. However, this can be then be reviewed when we have enough assurance that this is not necessary. 2. Disagree, we should continue with the status quo on replacement of the legacy meter by a smart, and as the MOA systems (agents' and small suppliers' especially) will be set up to expect D0149/D0150 for the legacy and new flows for the smart. We believe this adds unnecessary additional complexity to the accurate processing of Meter Technical Details. 3. We believe the Supplier should be required to send the Meter Configuration Details to the MOA to support any on-site meter investigations, disputes and where potential comms issues requires direct interaction via the Hand Held Terminal, on behalf of the Supplier. 4 - 7. Agree with the features of the proposed solution. 8. We do not believe that it is the responsibility of the Supplier to endeavour to ensure that the latest version of meter configurations for the day is distributed to relevant parties, where the meter is configured more than once on a given day. As per current industry dataflow processes, whereby the same dataflow instance can be issued more than once on the same day, the receiving participant is responsible for processing the dataflows in the correct sequence. It should be noted, based on the latest version of the DCC User Gateway Catalogue, that the DCC Service Response Type for a meter configuration may not necessarily facilitate having more than one meter configuration applied on the same day. 9. Agree. 10. We believe that PARMs will have to be reviewed to ensure that it reports accurately.
British Gas	1) Readings with be taken remotely by the DCC or Suppliers agent on installation under instruction from the Supplier. 2) We would prefer to see new and old flows completely ring fenced for legacy and smart meters. This will ensure the "minimal change" principle is maintained. Therefore the D0150 would be used to notify the removal of the legacy meter and the new flow used to notify the installation of the smart meter by the MOA. 3) We disagree with this statement. The Supplier should be mandated to send the MCD to the MOA. 4) There will be a dependency on the DCC to send details to the Supplier. The timescales will need to be reviewed once the service level from the DCC has been agreed. 5) Agreed 6) Agreed 7) Agreed 8) We would prefer to see a standard industry flow put in place between Supplier and MOA. However Suppliers and MOAs should be free to agree bi-lateral arrangements where appropriate. 9) Agreed 10) Agreed
E.ON	We are comfortable with the features of the proposed solution as set out in section 2.5.
2.6 Please indicate your preferred option for the transfer of data on change of MOA and change of NHHDC, along with the reason for	

your preference.	
Ovo Energy	Our preference is that the MOA provides the Meter Asset Details for both the change of MOA and NHHDC. Change of agents tend to primarily occur at CoS and it is therefore an improved process to have the same data set being sent by a single party, ensuring consistency of both the data and the timing.
Western Power Distribution	MOA should always be the party sending the meter asset data and Supplier should always be the party sending configuration data. This ensures the recipient of the data is always getting the "owner's view" of the data rather than getting it 3rd hand.
Siemens Metering Services	Our preferred option is for the MOA to provide the Asset Details and Config details. (This obviously relies on the MOA being updated by the Supplier whenever a change of MTD occurs as mentioned in 2.5). This option is omitted from Section 2.6 although it was discussed by the group and we believe that it should have been included in the consultation. Some advantages of the MOA provides the Asset Details and Config details: - it is as happens now and requires no changes and so has least change (a principles of this is work minimal change) - it caters for all scenarios including when there is a concurrent change of MOA and Supplier without further changes - it is possible as MOAs should have all data as they require Config Details for the reasons set out in the response to 2.5 Some issues with proposed changes: - BSCP514 6.2.1 Change of NHHMOA (No change of Metering System or Change of Supplier): In the scenario where MTD is not received and a legacy meter is installed then the new NHHMOA should send a D0170 to the old NHHMOA requesting the details. How will the NHHMOA know that a legacy meter is installed? BSCP514 6.2.3 Change of NHHDC for an existing Metering System: Where MTD is not received and a legacy meter is fitted then the new NHHDC should send a D0170 to the NHHMOA. The NHHDC will not know what type of meter is fitted. What should the NHHMOA do if a D0170 is received? - BSCP514 6.2.4 Concurrent change of Supplier and NHHMOA (No Change to Metering System) (1) Where a legacy meter is fitted the new NHHMOA sends a D0170 to the Old NHHMOA requesting the MTD. The new NHHMO will not know what type of meter is fitted. In this scenario the NHHMOA instigates the request for the MTD but will not know whether to or not. (2) The new NHHMOA will send a D0303 when he receives MTD. If MTD is simply passed Supplier to Supplier the MOA cannot do this. (although this is missing)

	The new Supplier would have to pass the MTD onto the new MOA. This is adding complexity to the process and will lead to data issues. It is more beneficial to leave 'as is' so that MTD is transferred MOA to MOA. (3) It would seem a sensible approach to transfer the MTD as now initially as this will be used for final reads even if the configuration is subsequently updated. The Supplier can then send the updated configuration to the new MOA to update their system. BSCP514 6.4.1 Investigate Inconsistencies For smart meters it states that the DYYYY meter configuration details could be sent if revised. How will the NHHMO know if the meter configuration details are revised if these are not sent from the Supplier each time the meter is reconfigured? - In addition, by introducing this change complexities in the process have been introduced with no apparent benefits. - As a result of the split responsibilities for the Asset Details and Config Details between the MOA and Supplier, responsibility does not influence the decision unless each party is required to separately send the data that it is responsible for. - Where old and new MOAs have passed Asset Details between each other, data for which they are responsible for, and any queries can be readily resolved between these parties.
TMA Data Management	TMA's preferred option is for the MOA to provide the meter asset details, minimising the number of steps in the process also minimises the possibilities of breakdown in the process.
Gazprom Energy	Supplier should distribute Meter Asset Details on CoA as provides supplier with greater visibility of missing information. This could also be extended to CoS events if the old supplier knew who the new supplier's agents are (via updated D0058 flows)
Haven Power	We feel that the responsibility for sending Meter Asset Details and ensuring the records are up to date should rest with the MOA as this remains closer to the current processes. Placing responsibility for this on Suppliers would raise issues as to how old information could be transferred with minimum cost and maximum accuracy and who would be responsible for that historical information's completeness.
Total Gas and Power	
EDF Energy	EDF Energy would favour a 'least change' approach to the transfer of data on Change of Agent/Change of Supplier, to minimise the need to vary registrations processing based on the meter type that is being dealt with. On this basis we would still expect the MOA, when appointed, to receive a D0148 that informs them of the previous MOA; a D0170 would be sent to request the MTDs from the previous MOA. The Meter Asset Details would then be received, processed and passed on to the Supplier to match up to their meter configuration data (provided via the DCC). The Supplier would then send the consistent Meter Asset and Meter Configuration details on to the NHHDC and LDSO; however we do not believe that the flows necessarily need to be sent as a set in all circumstances (especially as the Meter Configuration data will change when the Meter Asset data does not).
Enterprise	If Supplier mandated to send Config details to MOA then MOA could continue to provide Meter Asset Details as per current practice.

Managed Services	However, if Supplier is not mandated to send Config details then Supplier would hold most up to date Meter Asset details and so should Supplier should provide Meter Asset Details.
ScottishPower	We do not believe that there is a requirement for the MOP to hold asset data and therefore there is no requirement to pass asset data to a MOA on change of MOA. A Supplier should pass all the necessary meter configuration details to the NHHDC on a change of NHHDC.
Lowri Beck	Lowri Beck's preference would be for the Supplier to provide Meter Asset Details on a change of MOA and NHHDC (which would require a transfer of the Meter Asset Details between Suppliers on concurrent change of Supplier and MOA). With the control of the MTD set now being under a supplier hub approach it makes more sense for the supplier to control the distribution of the new set of flows for all scenarios, this will also not cause any delays in the new MOP / NHHDC receiving two smart flows separately by two different agents.
Northern Powergrid	We have no preference as long as we are provided with the information that we need in a timely manner. Although we see the obvious risk of removing this process from an already established agent, i.e. the MOA to the Supplier. With this in mind we would expect that compliance checks are completed during the transition to the new process to ensure data accuracy continues.
RWE Npower	Our principle is that the MAD goes from MOA to impacted parties so the responsibility for these rests with the MOA. We are not expecting the MCD being exchanged on CoS as the losing Supplier should become responsible for taking the closing read It is assumed that on a CoS, the new Supplier will apply their own configuration or retain the existing configuration advised from the comms agent, this is based on the assumption that the DCC is in operation, however further consideration should be given to the foundation period.
Electricity North West	Our preferred option would be for the Supplier to have responsibility of providing the Meter Asset Details on COA of MOA or DC as the Supplier will have the most up to date valid set of data. Another consideration is that for the new processes and dataflows that in a CoA scenario there is no requirement for the Supplier to send the new Meter Asset and Meter configuration dataflows to the LDSO as none of this data has been updated and the LDSO already has this data on file.
Salient Systems	Persist existing process – MOA distributes necessary data, predicated upon assurance of MOA custodianship role.
SmartestEnergy	The MOA should always provide the Meter Asset details. As the owners of the data, this should be driven by them so we agree with option 2.

SSE Energy Supply	We believe that it makes sense for the Supplier to be responsible for providing the data to its' agents. It will streamline the process.
British Gas	As the owner of the data the MOA should send the MAD on change of MOA & NHHDC.
E.ON	We prefer option 1 where the Supplier takes responsibility.
2.7 Should the NHHDC be required to wait for the Meter Asset Details, before processing readings? Please provide the rationale for your response.	
Ovo Energy	It would appear prudent to wait for the Meter Asset Details to be received before processing readings. One of the benefits of smart metering is to remove current time-intensive processes such as disputed reads, so it would seem negligent for NHHDC not to have the full details to allow a comprehensive validation of reads to occur. This only produces a slight delay and only when the agent is changing.
Western Power Distribution	No. The NHHDC should be able to make reasonable assumptions as to what the relevant data is in 99.9% of occasions and there is no reason to delay readings being processed.
Siemens Metering Services	The default for NHHDC systems is for the MPAN to be in a de-energised statement. They require the Asset Details data to change the energisation status. Other validation by NHHDC systems that uses data on the Asset Details also occurs before readings are processed. We believe that processing of readings before receipt of the Asset Details does have the potential to cause validation and data accuracy problems.
TMA Data Management	The NHHDC is responsible for validating the reads, having the full and correct information concerning the metering on site is a big part of being able to fulfil that obligation, therefore both aspects of the smart meter technical details need to be received for reads to be validated.
Gazprom Energy	No. There is limited risk to settlement for DCs waiting for asset details. This would cause unnecessary delays to processing of readings and invoicing at supplier.
Haven Power	Yes. Not knowing energisation status could lead to mismatches and a D0095 being raised unnecessarily where energisation is assumed.
Total Gas and Power	
EDF Energy	EDF Energy does not believe that it is necessary to wait for meter asset information in order to be able to process meter readings for settlement purposes, as none of the data items defined on the Meter Asset Details flow in Appendix 2 are required for these purposes.

	The only exception to this is the energisation Status which forms part of the Meter Asset Details. This data is required by the NHHDC to be able to validate meter readings, and this is also required to be populated on the D0019 sent to NHHDA for use in settlements. While the MOA should remain the owner of energisation status information we believe that it should be possible for the Supplier to be able to provide an accurate view of this information to the NHHDC without needing to wait for the Meter Asset Details to be transferred by the MOA. On a CoS the Supplier will receive the energisation status from MPAS as part of registration dataflow processing, and if the Supplier is able to communicate with a smart meter via the DCC then this logically implies that the meter must be energised. We would therefore recommend that options for Suppliers to provide energisation status information to NHHDC to allow them to process data into settlements be explored; the NHHDC's ability to pass accurate data into settlements on behalf of the Supplier should not be hindered by issues regarding Meter Asset data, especially where only one data item relates to settlement processing.
Enterprise Managed Services	n/a
ScottishPower	We believe that the Supplier should be able to source all the data that is essential for the NHHDC to process smart data without data being provided by the MOA.
Lowri Beck	Yes, Lowri Beck believe that the NHHDC should wait for the Meter Asset Details before processing readings, this is because the DC are required to ensure that they are validating a read against an meter which is currently installed at that MPAN and is energised. Without the Meter Asset Details the DC will be unaware of such information.
Northern Powergrid	We believe the details should be issued alongside each other.
RWE Npower	There may be scenarios where the NHHDC would only require the MCD and not MAD such as if there was a change in energisation status. In this situation the MCD would need to be processed independently from the MAD. A full list of scenarios will need to be compiled where only the MCD is required. We are also assuming that MCD and MAD are new flows to distinguish from existing flows.

Electricity North West	The NHHDC should not have to wait for the Meter Asset Details before processing the readings as they can assume the meter is energised by receiving configuration information from the Supplier.
Salient Systems	No, modern NHHDC systems deal with such anomalies already but will escalate requests for missing MTD as appropriate and subsequently automatically review and correct resulting business process integrities where necessary.
SmartestEnergy	Yes, as it introduces risk without them E.G. Energisation status is required in settlement.
SSE Energy Supply	Yes, on the basis of the current requirements for Pool Validation and for the accuracy of the settlements.
British Gas	I think that it would be more sensible to wait for the MAD to ensure the accuracy of readings etc. In theory though, if the MOA was to retain responsibility for communicating MAD & MCD then in reality these flows could continue to be processed as a relational pair.
E.ON	No we believe the NHHDC can assume the meter is energised.
2.8 Please provide feedback on the draft redlining in Attachments B, C and D. We are particularly interested in the overall approach to the redlining, though detailed comments are also welcome.	
Ovo Energy	We are content that the existing BSCPs should be augmented to reflect smart metering activities, rather than producing new documents. We concur that this reduces costs and aids in managing future change proposals
Western Power Distribution	We would prefer the existing legacy processes to be kept separate and new "smart" processes added as a separate section of the BSCPs. Trying to merge NHH & Smart NHH makes the documents even more difficult to follow than they are now.
Siemens Metering Services	2.2.1 Recording of Details We do not see the need for the 'Minor change' made to paragraph (b) to state that an incoming MOA may request transfer of data from an outgoing MOA rather than being a mandatory process as we believe that the outgoing MOA should still be mandated to send Asset Details and Config Details to the new MOA. (see response to question 2.6 above) Please See BSCP514 comments in the response to question 2.6. We believe that many of the changes are not required as the NHHMOAs should send MTD in COS / COA situations. We have made some comments on the Change of Measurements class red lining but have not considered this in any detail. This area is not covered sufficiently by the Consultation paper. It is likely that the sites moving between NHH and HH measurement classes will NHH AMR sites. As mentioned in our response to question 2.3 we believe that Non-Half Hourly settled AMR Metering Systems should also be excluded.

	Here are a couple of comments: 7.1 Change of Measurement Class from NHH to HH Metering System & ALTERNATIVE SMART NHH-HH CoMC *NOT* COINCIDENT WITH CoS: 7.1.11, 7.1.12 In the red text the Supplier sends the Asset Details and Config Details to the HHMOA. This could equally be carried out using existing processes whereby the supplier instructs the NHHMOA to send the Asset Details and Config Details (based on the response to question 2.5 above, i.e. MOA has current Config Details) to the HHMOA. An advantage of this is that Old and new MOAs have passed Asset Details between each other, data for which they are responsible for, and any queries can be readily resolved between these parties. 7.2 Coincident Change of Measurement Class from NHH to HH Metering System and Change of Supplier *& ALTERNATIVE SMART-SPECIFC NHH-HH CoMC COINCIDENT WITH CoS*. New step after 7.1.13. How does the new HH Supplier know the metering details so that they can be sent to the HHMOA? Wouldn't this require a NHH Supplier to HH Supplier process for transfer of information? As with the Change of agent flows considered in the response to question 2.6, it would seem more appropriate to maintain the MMOA to MOA transfer of information as this would introduce less change. Also as mentioned above, Old and new MOAs will be passing Asset Details between each other, data for which they are responsible for, and any queries can be readily resolved between these parties.
TMA Data Management	The overall approach of splitting only when necessary between legacy meters and smart meters is good. Attachment C BSCP504. The Smart only version of CoDC with no change of meter or coincident CoS with no reliance on historical readings is our preferred option. Change of MOA, option 2 MOA sends Meter Asset details directly to the NHHDC is our preferred option. We also agree that a separate smart meter only process needs to be created for the COS and change of LDSO processes.
Gazprom Energy	Suppliers might not necessarily need their own documentation but they will need some form of BSP to ensure that they are all following the correct procedures in this process. This could be via amendment to already existing BSCP504 etc.
Haven Power	No comments
Total Gas and Power	
EDF Energy	We do not have detailed comments on the red-lined changes at this point as we note that they are in draft and require further work. However EDF Energy agrees with the stated approach to the red-lined changes, specifically the avoidance of unnecessary repetition by the branching of processes based on meter type rather than creating new processes specifically for smart meters (unless this is appropriate).

	Given the proposed optionality of some of the flow interfaces (for example the optional passing of Meter Configuration Data from the Supplier to the MOA) we believe that any revisions to the BSCPs must make a clear distinction between those flows that are regarded as being mandatory, and those that are optional based on contractual arrangements. Users of the BSCPs need to be clear on the mandated steps that they need to achieve to remain compliant with the BSCP, and it will need to be clear to the Auditor who assures these processes under the Performance Assurance Framework which steps are mandatory and in regards to which non-compliance will have a material impact on settlements.
Enterprise Managed Services	Separating out legacy and SMART is the correct way to go. We believe that a Supplier BSCP should be produced to make it clear and provide clarity on the responsibilities of interaction between Agents and Supplier.
ScottishPower	We believe that a holistic approach should be taken to any code changes relating to smart metering, with the possibility of developing smart specific processes as subsidiary documents of the Smart Energy Code (SEC). We are concerned that making the arrangements optional in some areas (e.g. „shall" becomes „may" in 2.2.1 b) could interfere with the role of the performance assurance framework and as such are still to be convinced that relying on the BSC as the vehicle for delivering these requirements is the most optimal solution.
Lowri Beck	BSCP514 Pg 67 Section 6.2.2.17 The proposal states that if the metering system is unable to communicate with the DCC, details of the failure should be communicated from MOA to Supplier via Telephone/Email. This could be communicated to the Supplier via a new flow and therefore not causing any issues the results of the job. BSCP514 Pg 72 Section 6.2.5.9 The proposal states that on a Change of Supplier (no change to Metering System or change of NHHMOA) that upon appointment the MOA should send the Meter Asset Details to the New Supplier. However, to the MOA this would just be another appointment process regardless of whether they were MOA on the previous Supply Period and therefore there may not necessarily be any initial indication that the current appointment is just a CoS without CoA. With this in mind and the fact all other appointment scenarios require the Supplier to send the 'new' (albeit they were also the old) MOA the Meter Asset Details, should this section not also follow the same process, to avoid confusion, instead of reversing the process so that MOA send the details? This also shows that the MOA should generate the Meter Configuration data flow, it previously states that the MOA should only generate the configuration data flow when a local update has been done onsite. BSCP504 Section 4.2.3 The proposal suggests that the new MOA will provide MTDs to the new NHHDC, however, other processes state that when for smart meter the Meter Details will be provided by the new Supplier only. Clarification on who will send this information to the new NHHDC

	is required. BSCP504 Sections 3.2.6 & 3.2.7 (Change of Supplier for an existing SVA Metering System.) & (change of LDSO), we would require the redlined information once made available.
Northern Powergrid	In general we are in agreement with the redlining. We believe that further drafting may be required in terms of BSCP 514, to add further detail for example reference 6.2.4.1.1 we would expect to see more steps relating to the smart process, i.e. mirroring the legacy end to end process. There were similar references like this one throughout the BSCP.
RWE Npower	Once the key principles are agreed we will be able to undertake a detailed review of the impacted BSCPs, until these are agreed we wouldn't be able to comment.
Electricity North West	BSCP514 – LDSO Replaces MS In the scenario where an LDSO replaces a Smart Meter due to emergency should the communication be carried out with the Supplier rather than the MOA, as the Supplier is now responsible for sending of the Meter Asset and Configuration flows. Not all LDSO's will install a Smart Meter for safety, therefore the LDSO would contact the Supplier to inform them that the meter required replacing.
Salient Systems	Firstly, hats off to the guys at Elexon who have had to wrestle with the redlining exercise here, I hope they've now been allowed out into the sunshine! Detailed comments here are available and can be provided separately if requested, otherwise will be deferred until any resulting CP's are raised. This initial redlining exercise provides the most useful vehicle to assess early the real scope and impacts attached to proposed change – change required at industry systems and, most importantly, at the implicated operational procedures at agents. Immediately it is clear that the scope of proposed change is considerable and that the level of control coupling between business process variants by metering type would suggest that where existing industry systems do not benefit from a structured business model driven design architecture then implementation of the required changes will be onerous. But the redlining exercise will indeed provide designers with a very relevant starting point from which to drive out confident estimates of costs and delivery timeframes – outputs here will be interesting!

	However, the impacts upon operational procedures at MOA's particularly, together with the additional problems arising due to an expected point in time transition from existing processes to radically changed processes will, in our view, raise more significant risk to assuring effective service transition than any associated system change issues. Assuring the logical integrity of any proposed data interfaces alone is never the whole story – assuring effective data management processes at and between parties is similarly required. Re-qualification of party systems and procedures will require significant end to end BIT testing across representative BIT test environments. Existing re-qualification process will likely not be appropriate nor practicable, a centrally coordinated approach is implicated, which in itself introduces additional risk to timely delivery of test environments and test scenarios etc. Further refinement of 'minimal change' scope is encouraged to mitigate the significant risk of service transition inertia, stall and sticky tape. A Supplier BSCP would be a useful delivery, complemented by a document from DCC at some point similarly describing interfaces to and from DCC from the DCC perspective.
SmartestEnergy	Happy with the amendments
SSE Energy Supply	On the basis of the proposed new smart specific flows, we are satisfied with the proposed approach to the redlining. However, we would have preferred to have been able to have had sight of the redlining that would have been required for amending the existing D0149/D0150 to support Smart meters. This would provide the industry with an opportunity to express the option for the working group to progress to formal change. The details will have to be reviewed when the material changes are agreed. From a high level view of the redlining the proposed amendments that stand out are; <u>Attachment B BSCP 514 MTD draft</u> 6.2.2.14/6.3.3.1/6.3.4.1 - the inclusion of a separate flow DZZZ Smart Installation Request should be removed as we do not agree with making any changes to or creating another flow for D0142. 7.1 -7.4 - the process for CoMC needs further working through to develop the proposed solution. For example, is there sufficient detail in D0268 for it to be appropriate for Smart? Where there is Smart metering, how does a MOP know when working in HH mode or know when to send D0268? The workgroup needs to work through the CoMC process and redraft the redlining. 9.2 - clarification is required in the BSCP for this section that the Smart Prepayment meters will follow the Credit Flow process and

	not the legacy Prepayment meter dataflows. Attachment C BSCP 504_MTD_draft 3.2.6 – we don't believe that the provision of a reading, that is an accurate read from the Smart Metering to the DC, is necessarily a complex process, 3.2.7 – similarly this should not be a complex process. 3.4.1 footnote 88 – the requirements for NHHDC and visiting de-energised sites should not be different whether it is a legacy or smart meter. 3.4.1.5, 4.2 & 4.8 – we do not believe that changes to the Reading Validation rules is within the scope of this work to evaluate changes required for Smart Meter Technical Details. References to modifying reading validation or new/relaxed requirements should be removed.
British Gas	Splitting out into another section / document for Smart / remotely configurable meters may make the document easier to read.
E.ON	We are happy with the overall approach. We have one detailed point. BSCP514 6.3.3.10 – Could this be reworded to read "On receipt of Dxxx flow" as at the moment we are expected to send MTDs to the DC within 10 days although we may not have received the Dxxx flow ourselves from the MO.
3.1 Do you agree that Meter Asset Details and Meter Configuration Details should be sent as new flows for remotely configurable meters (with existing D0150, D0149 used for conventional non-smart and non-remotely-configurable AMR meters, and D0313 used for AMR meters)? Please provide the rationale for your response.	
Ovo Energy	It's clear that changes are required to the existing flows to allow the smart project to be undertaken and these new flows would appear to simplify the current flows. However, there is a concern that we're now materially changing the MTD process for smart metering and creating a two-tier system, resulting in significant changes to supplier systems, whilst continuing to run the old process for dumb meters. There is an added concern that the MOA may trigger the wrong flows for a smart meter and vice versa for a legacy meter. It therefore questions the role of the D0142 and how requests will be made for smart installs to ensure that the correct flows are triggered post exchange. Will smart meters be requested simply by choosing a 'Retrieval Method' of 'R' within the D0142?
Western Power Distribution	Use the new flows for DCC operated meters only. Use existing flows for all other meters.
Siemens	No, AMR meters should not be included in the change. The change should be limited to Smart meters for reasons given in response

Metering Services	to 2.3 / 2.4. This will add too much complexity as AMR meters can change from remotely configurable depending upon the communications system status.
TMA Data Management	No, the information contained in the new flows could also be provided in the D0149/D0150. The only data item that is not present in the D0149/D0150 is the new data item proposed of configuration sequence number. As there is no new significant and meaningful data items in the new flows, there is no justification in creating them other than the fact that they can be sent separately when the D0149 and D0150 are a pair. Are we trying to fix some issues with D0149/D150 for smart meters only instead of fixing the issues for all metering?
Gazprom Energy	No as this could cause further confusion in an already saturated process. Information contained within D0149/D0150 and D0313 can be extended to remotely configurable meters, there is no need for new flows to be created.
Haven Power	No. Both sets of flows would essentially do the same thing and this overcomplicates the process. It would be far simpler to amend the current flows to include extra optional fields that are only populated for remotely configurable AMR meters. This would mean the differentiation is clear and straightforward allowing amendments to processes and systems are kept to a minimum.
Total Gas and Power	[Strong preference for new flows and data items rather than modifying existing elements; D0149 and D0150 should be preserved for legacy metering]
EDF Energy	EDF Energy strongly recommends that new flows are used for these remotely configurable meters. We believe that the changes that would be required to the existing D0149/D0150 dataflows to reflect the changes in data ownership would require a significant degree of conditional formatting and optionality to be introduced which then creates a significant risk to the legacy metering flows which will continue to be used for some time. It would also create confusion where the same flow might be sent by different parties, and in different formats, depending on the type of meter. It is a much cleaner and simpler solution to create new flows that have been designed specifically for the purpose of communicating information about smart meters.
Enterprise Managed Services	We don't believe new flows are necessarily required and that the existing flows should be adapted to meet SMART Metering requirements. Our rationale for this is that most details would be duplicated on the new flow, any additional data items required could be incorporated into the existing flows.
ScottishPower	Yes, we support the approach of creating new data flows to support the exchange of data for SMETs compliant meters. We believe the proposed "Meter Asset Details" data flow should only be provided from the MOA to Supplier on asset install, removal and exchange. The Supplier should send only Meter Configuration Details to the NHHDC and Distributor.
Lowri Beck	Lowri Beck agrees with the proposal to implement new flows for smart metering, this will enable MOA's / Suppliers to differentiate

	between traditional and smart metering.
Northern Powergrid	There needs to be as least cost as necessary and therefore by incorporating new flows there would be a cost. It is our views that if existing flows can be used then carry on doing so.
RWE Npower	Yes – The MAD and MCD should be sent as new flows to minimise risk and potential impact to the existing processes. We do not see the benefit to removing the RCAMR and RCAMY meter types from the current procedures. The bulk of these meters installed historically will not comply with any version of SMETS and so there is a doubt as to whether these would ever be adopted by DCC. The industry has carried out a lot of work to introduce and use the D0313 flow for AMR and any meter for which there is an intention to use DCC services should be changed to one of the new meter types at which point the 'SMART' flows would apply.
Electricity North West	We do agree that new dataflows should be sent for the installation and removal of Smart Meters as the data is being distributed by the Supplier and as previously stated the Supplier will have carried out validation so LDSO's can receive and store the information. We want to receive the removal of the legacy meter via the D0150 from the MOP to close down the legacy meter on our systems.
Salient Systems	Preference – use new flows where required rather than introduce functional dependencies between data within flows.
SmartestEnergy	Yes, creating new flows rather than amending existing flows and running an additional parallel process is a simpler option.
SSE Energy Supply	We would not rule out amending the existing D0149/D0150 flows which we believe is still the least change and least impact to systems. For a balanced industry view, an alternate solution of amending the existing D0149/D0150, together with the appropriate changes to the relevant BSCPs should also have been included as part of this consultation to allow parties to impact assess the change. If it is agreed within Industry that new dataflows will be introduced for Smart Metering Asset and Configuration Details, we agree that the use of D0149/D0150 and D0313 would continue as described. This would provide a cleaner approach from a process and systems perspective for existing logic used by participants.
British Gas	The D0149/150, whilst they work have a number is shortcomings and going forward these can be addressed by having new flows for remotely configurable meters. It will also provide a one off opportunity to build future proofing into flows that are likely to be in use for the next decade or more. Elexon should also consider whether additional data relating to the physical wiring on site (electric vehicle charging/heating load) should be included in the new flows.
E.ON	Yes. This is a sensible approach to keep remotely configurable meters separate from those already in existence.

3.2 Do you agree with the proposed contents of the Meter Asset Details and Meter Configuration Details flows? Please provide any suggested changes, along with your rationale.	
Ovo Energy	Smart meters will communicate using various methods, which can and will change during a meter's life. This information will be useful to suppliers for a number of reasons, so it would be sensible to retain the 'Communications Method' but include it in the 'Meter Configuration Details'. During the install it should be the MOA's role to provide the 'Meter Asset Details' to the Distributor, but this flow does not allow for interaction between these two parties.
Western Power Distribution	If smart HH is not included for go-live then the contents are OK. Otherwise add a measurement class and appropriate HH items to the configurations details flow.
Siemens Metering Services	Partially We would suggest that it may be useful to have another data item to track the SMETS version. (as mentioned in response to 3.7)
TMA Data Management	Please see answer to 3.1.
Gazprom Energy	No comment
Haven Power	No comments
Total Gas and Power	
EDF Energy	EDF Energy agrees with the contents of the proposed Meter Asset Detail and Meter Configuration Detail flows. From a systems implementation perspective they are using existing data items but split across the flows in different ways, which supports a least change approach to implementation while still reflecting the changes in data ownership. We would however recommend that the Retrieval Method and the associated Retrieval Method Effective Date are removed from Meter Asset Detail to Meter Configuration detail as the method for reading the smart meter will not be known by the MOA. In the circumstance where there are issues with the WAN communication to a meter and manual meter readings are required, the Supplier will be aware of this and will instruct the NHHDC to take manual readings until the WAN issues are resolved. This data item is therefore owned by the Supplier and so should be removed from the Meter Asset data.
Enterprise Managed	Content ok. Any difference should be incorporated into the existing D0149/D0150 flows.

Services	
ScottishPower	We have the following comments on the proposed content and use of the data flows. Meter Asset Details (Job Completion Details) We consider that this data flow should only be used by a MOA when they complete a metering job (e.g. installation/exchange). The data flow should include data relating to all assets installed as a part of the smart metering system. We support the inclusion of the proposed data items, namely: Date of Meter Installation, Meter Location, MPAN Core, Meter Type, Manufacturer Make & Type, Meter Id (Serial Number), Date of Meter Removal. In terms of specific data items we suggest that the "Manufacturers Make & Type" are split in to two separate data items a job request identifier is included "device id" is used instead of "meter id" It may be necessary to consider each asset to determine whether additional attributes are required e.g. a PPMID may be wired or wireless; Comms device – WAN signal strength. Further data items are required, these include: partial job completion data; additional work carried out; reasons for a customer declining an IHD; reasons for refusing a smart meter; data privacy consent; and the identification of suitability for the operation of a smart PPM. Meter Configuration Details

	We would include all of the data items as presented in Appendix 2. In addition, we would include the Energisation Status enabling support for existing NHHDC processing e.g. a D0019 contains the Energisation Status Within the flow structure – the attributes associated with both settlement and non-settlement registers should be the same, e.g. meter register type, measurement quantity id apply equally to either. <u>Asset Details (CoS)</u> As we consider that responsibility for management of asset details should move from the MOA to the Supplier. There is a requirement for asset details to be exchanged on Change of Supply, this data would include: Device Id; Manufacturer Make; Manufacturer Model; Firmware Version; Meter Type (e.g. SMETS 1, SMETS 2); Installation Date; Device Location; and Asset Provider Id. Ideally this data would be available from the DCC having been updated on install/exchange by a Supplier. Current discussions on the enduring security architecture may necessitate the need to exchange further information.
Lowri Beck	Meter Asset Details The Distribution list shows the flow can pass from 'MOP to MOP'; although, I can find no process steps where this might happen in the BSCP's. Therefore, perhaps this might not be needed unless just for future proofing? However, 'Supplier to MOP' is missing from the list and occurs copiously in the BSCP's.
Northern Powergrid	Yes
RWE Npower	Yes – However we believe the MAD and MCD should also include the Meter Firmware Version. The MAD should also include the identity of the Comms Hubs and their firmware versions. Consideration should also to be given to include more asset details, such as IHD, firmware for comms hubs and meter.
Electricity North West	As stated in 2.8 above the Distributor, where a Smart meter is installed, should carry out all liaison with the Supplier therefore there is no requirement for the 'Meter Asset Details' flow to be sent from Distributor to MOP an instance is required from Distributor to

	Supplier. Also as the Supplier can configure the Meter Type there should be an instance of the 'Meter Asset Details' from Supplier to MOP. There is no requirement for the Certification Date and Certification Expiry Date on the Meter Asset Details dataflow.
Salient Systems	Asset Detail flow looks to be candidate for review (register detail) – particularly on the basis that MOA may not (under current proposals) have configuration details. Implications here will depend upon future adopted schemes for dynamic register switching, tele-switching, auxiliary switching, load control and future smart grid aligned initiatives (demand and export related). Configuration flow – add relevant MSNSFC attributes.
SmartestEnergy	Yes
SSE Energy Supply	On the assumption that the new flows are built, we believe that the data items for CT and VT Ratio is not required. Inclusion of CT can be reviewed when necessary.
British Gas	We have a number of comments about the draft flows and these fall into two categories – addressing D0149/150 shortcoming and new data. <u>D0150 shortcoming – MAD flow</u> Top level group should have flag to indicate if 'meter at metering point' – currently if no meter details are provided it is not clear if this is because there is no meter present or an error by the sender. Manufacturer Make & Type – this should be split into its components parts and a valid set introduced. <u>Data – MAD flow</u> Retrieval method & date - as all Smart meters will be remotely read these data items appear to be redundant. If VT is not required initially then I would set the conditionality for this item to 'N' rather than '0'. There is no information in the flow about what circuits or external contactors are connected to the meter. Without this information the supplier will be unable to determine the SSC that is required or what tariffs to offer. Only the MOA can advise of the physical connections so this information needs to be included in this flow. <u>Data – MCD flow</u> Given that the MCD data is likely to change more frequently than currently, I would change EFSD{MSMTD} to EFSD{MSMCD}. As there can only be I SSC associated with the MPAN it could be moved into the top level group. As Non Settlement registers are typically only used by suppliers then I would either remove them from the flow or merge them into the TPR group and add a 'Settlement/Non Settlement' flag to that group. Both register groups need to include the data item 'Meter Register Description' as per D0313 as the meter may display a register id

	that is longer than that data item can contain, that was why it was added to D0313.
E.ON	Yes
3.3 Do you agree that Test Date and Next Test Date should be used in place of Certification Date and Certification Expiry Date?	
Ovo Energy	As smart meters will be MID approved it would appear that the term 'certification' has become outdated and needs to be replaced.
Western Power Distribution	Yes, this seems sensible.
Siemens Metering Services	This was raised at the UKMF for a second time to ensure this was the view of the group on 18 October 2012 and all parties were in agreement with this change. If other parties that respond to this consultation are also in agreement, then two new data items should be included in place of J0462 and J0463 for Test Date and Next Test Date.
TMA Data Management	Yes
Gazprom Energy	Yes
Haven Power	No comments
Total Gas and Power	
EDF Energy	EDF Energy agrees that this is an appropriate change.
Enterprise Managed Services	Yes
ScottishPower	We do not agree that these data items should be included within a data flow. The process of MID sampling and testing should not require data to be updated on a meter specific data flow. MID testing is based on sampling from a population of meters and therefore the only requirement is to be able to identify the population a meter belongs to using data such as the manufacturer, model and Meter Id.
Lowri Beck	Lowri Beck are part of the UKMF group and understand that all meters will be subject to the MID and in service testing process rather than fixed certification. Samples will be taken off the wall from groups of meters and dependent on the metrology accuracy of the results meter life will be extended. The aim Is not to have fixed service life so the original data items will be redundant.
Northern Powergrid	We agree with this as all meters installed should be MID compliant.
RWE Npower	Prior to making any changes clarification would be required regarding distinction between certification and in-situ testing.

	We would also like confirmation of the certification regime going forward.
Electricity North West	We agree that the 'Test Date' and the 'Next Test Date' should be used in place of 'Certificate date' and 'Certificate Expiry Date'.
Salient Systems	Yes, on balance.
SmartestEnergy	Yes
SSE Energy Supply	We do not agree that this is a change that is required for the purpose of supporting Smart Metering. If parties wish to progress this, it should be evaluated by a specific issue change.
British Gas	Our understanding is that currently the MOP holds the Cert Date and only calculates the Cert Expiry Date when required to send the flow. This is because OFGEM could change the cert life which means the end date can change whilst the meter is in situ. Will this change under MID? We would suggest that what is sent is 'Test Date' and 'Test Validity Period' (years).
E.ON	Yes
3.4 It has been suggested that the mass roll-out of smart meters offers an opportunity to standardise 'Manufacturers Make & Type' (e.g. via the introduction of a Valid Set or a new item in Market Domain Data (MDD)). Do you agree with this proposal?	
Ovo Energy	Yes, reporting on this item would be significantly easier if there was a standardised list. This is not the case at the moment as the 'free field' format leads to numerous deviations and incomplete details. We therefore wholeheartedly agree with this suggestion.
Western Power Distribution	This would be a great benefit although we would need to create a new data item to avoid having to standardise all existing makes & types. We are unsure as to where the master list should be held as we don't know how quick the process of adding a new make & type needs to be. The required speed to add a new record will dictate whether the DTC valid set/MDD item/List held on the ELEXON website is the most appropriate solution.
Siemens Metering Services	Agree in part. We would suggest that the initially characters should be standardised so that the meter is readily recognisable but that this should not preclude the addition of other information after this. This leaves flexibility for MOAs to use it in ways they may wish whilst allowing others to recognise the meter.
TMA Data Management	Yes
Gazprom Energy	Yes, this would improve data quality
Haven Power	Yes we agree. A central master list will allow simple validation of MTD"s and improve consistency and accuracy of meter details held in systems.

Total Gas and Power	[Believe it is sensible to take the opportunity to standardise this information as part of mass rollout]
EDF Energy	EDF Energy agrees with this proposal as potentially useful information about meters is not being communicated because of the inconsistent population of this data item. If such standardisation is introduced then it must be ensured that any validation against MDD will only occur for data in the new Meter Asset Detail dataflow and not in any legacy dataflows, especially the D0150, as it would not be appropriate to apply validation to this data. There would also need to be a clear process for management of the valid set of Manufacturer Make and Type data within MDD and ownership of the approval of new meter types. Additionally the valid set of meter Manufacturer Make and Types must be at a sufficient level of detail to be useful to MOA, specifically the information must enable the MOA to understand where a variant smart meter (for example a multi element meter) has been installed as it would be necessary to replicate such functionality were the meter ever to need to be replaced.
Enterprise Managed Services	Yes – but only for SMART Meters not for legacy
ScottishPower	We support the proposal to incorporate smart meters in MDD. The definition in MDD might also include meter characteristics. The data items should also be split so that the "manufacturer" and "model" are separate data items
Lowri Beck	Lowri Beck agrees with the proposal and can see that a valid set used for this field could only be beneficial and potentially be used to indicate smaller meter attributes such as phase capacity etc.. in the future.
Northern Powergrid	We agree in principle with this proposal so long as, it does not create delays in the current timescales for the smart metering rollout
RWE Npower	Yes – This would present the ideal opportunity to standardise "Manufacturers Make and Model" thus simplifying system processing. Standardisation of these data items would be welcomed, however we believe that there should be no mandatory requirement to cleanse historic data. We believe the mandatory inclusion of Make, Model and Firmware version would make this consistent with SMETS.
Electricity North West	It would make it easier if the 'Manufacturers Make & Type' could be selected from a pre-defined list, the only concern is that in order to maintain this list Manufacturers/MOA's/Suppliers would have to ensure that the new 'Manufacturers Make & Type' was in MDD before the MOA began installing that type of Smart Meter.

	Alternatively you could have an 'Other' category if the new 'Manufacturers Make & Type' Smart Meter has been installed prior to being in MDD but then this will become the default for most new meters.
Salient Systems	Yes, although not critical.
SmartestEnergy	Yes
SSE Energy Supply	No, as this is not relevant to what we are trying to achieve here. We do not see the benefit and this will only delay the implementation of this change.
British Gas	We think the field should be split into its components parts and a valid set defined, possibly in MDD.
E.ON	Yes
3.5 Time Pattern Regime and Register Mapping Coefficient are included in the Non Settlement Registers group of the D0149 flow. They have been excluded from the Meter Configuration Details flow on the basis that they are not relevant to Non Settlement Registers. Do you agree?	
Ovo Energy	We agree
Western Power Distribution	Yes
Siemens Metering Services	No comment
TMA Data Management	Please see response to 3.1
Gazprom Energy	Yes non-settlement registers aren't required by suppliers as they are not invoiced so would streamline the process if suppliers are to distribute these files.
Haven Power	Yes
Total Gas and Power	
EDF Energy	EDF Energy would agree that this information would not be required to be sent as part of the Meter Configuration Details dataflow. While some non-settlement registers are allocated specific TPRs that reflect the time for which they operate, the receiving parties for this data (specifically the NHHDC and the LDSO) do not need to know this information. As noted in our response to question 3.6 below the only reason an NHHDC would need to know about non-settlement registers at all would be if a manual reading were required from the meter; even if they did know that the register was non-settlement they would

	not need to know the switching times for that register, which the Supplier should know, so we would recommend this information is removed from the Meter Configuration Detail flow.
Enterprise Managed Services	No
ScottishPower	We believe that it is important that a Data Collector is able to process all the register read data it may receive from a Supplier, whether the registers are settlement or non-settlement. We must be able to identify what a non-settlement register (e.g. the total cumulative import register) is recording; if the TPR is not used to do this then an alternative mechanism needs to be identified. We agree that there is no requirement to retain the register mapping coefficient.
Lowri Beck	In principle Lowri Beck agree that the Non Settlement Time Pattern Regime and Register Mapping Coefficient can be excluded from the Meter Configuration Details flow. Our question would be does this mark the end of non settlement registers going forward?
Northern Powergrid	We agree with the proposed contents of the Meter Configuration Details flow. However as Non Settlement Registers are included within the Meter Configuration Details flow it would seem sensible for now that the Time Pattern Regime and Register Mapping Coefficient is also included in order to align with the D0149 flow. If Non Settlement Registers are no longer relevant in the future then these data flows can be excluded then.
RWE Npower	Yes – For simple metering scenarios, however would this approach be applicable for complex scenarios and export metering? Consideration should be given to the benefit of adopting a standard set of Non Settlement registers which all SMART meters would contain. Should the MCD include the displayed registered name?
Electricity North West	We agree that the Time Pattern Regime and Register Mapping Coefficient do not need to be included Non Settlement Registers group.
Salient Systems	TPR is relevant attribute of MSNSFC. Additionally, see 3.6.
SmartestEnergy	No, a further review and impacts of the DC not holding this information is required before this can be fully understood. E.g. On site visit where an eye-balled meter reading is required.
SSE Energy Supply	Yes.
British Gas	As Non Settlement registers are typically only used by suppliers then we would either remove them from the flow or merge them

	with the TPR group and add a 'Settlement/Non Settlement' flag to that group.
E.ON	Non settlement registers should be included within the required flows to ensure the correct data is captured.
3.6 Do you believe that there is still a requirement for NHHDCs to know about Non Settlement Registers if they are not retrieving readings from the meters?	
Ovo Energy	No, it would appear to be superfluous data for the NHHDC.
Western Power Distribution	Yes. Smart Meters will still record non settlement data such as spilled export and maximum demand. Although the NHHDC may not use these registers for settlements the data may need to be retrieved and passed on to the Distributor. It would be prudent to cater for this. Unless a specific change proposal is raised to alter it, the Data Retrieval and Data Processing functions should deliver the same data to Distributors as it does now.
Siemens Metering Services	Yes, NHHDC may be required to perform a site-visit and therefore needs to know what registers to read.
TMA Data Management	No, the use of non settlement registers when data is not being retrieved is not required.
Gazprom Energy	Yes as suppliers cannot be sure that the DC has set up the settlement registers correctly. Sometimes readings are transposed onto non-settlement registers. These are easier to spot if supplier/DC still has record of them. Also, DCs need to check MD for mandatory upgrades.
Haven Power	Yes, Maximum Demand is used for industry processes such as decisions surrounding change of measurement class and an NHHDC"s role for an opted out meter will not just be data validation. It is also proposed that these registers be mandated under SMETS 2 and whilst this is primarily for DNOs it would advisable to see how this develops before removing items.
Total Gas and Power	
EDF Energy	The role of the NHHDC is to provide consumption data into the settlements process; by definition therefore they would not need to know about non-settlement registers within the meter. However, if the Supplier were ever to need the NHHDC to take a manual reading (for example in the event of a WAN failure) the NHHDC would need to know all of the registers that the Supplier needs to have readings for. On this basis we believe that Suppliers should be able to provide details of non-settlement registers to their NHHDCs using the Meter Configuration Details flow if they so choose; and NHHDC should be capable of processing this information as they do currently from the D0149/D0150. In either circumstance the Supplier must inform the NHHDC of the registers that it intends to provide readings for on the D0010 dataflow to ensure these flows can be successfully processed.

Enterprise Managed Services	Yes
ScottishPower	If there is an exchange of readings at CoS between new and old NHHDC then there may be a requirement to ensure that at least the total cumulative import register read is passed. This register may not be a settlement register. Further consideration needs to be given on how reading data captured during the Must Inspect process is to be processed.
Lowri Beck	In principle, there is no requirement for the NHHDC to know about Non Settlement Registers if reads are only to contain settlement reads as it will not be necessary to hold this information. In addition it may prevent any instances whereby settlement and non settlement registers are transposed. However, this is on the assumption that when the D0010 is sent to the NHHDC by the Supplier the supplier will only provide settlement reads for that meter. If the wrong reads were recorded against the registers, then the DC will have limited visibility to correct them
Northern Powergrid	We have no preference as long as we are provided with the information that we need in a timely manner.
RWE Npower	Yes – NHHDC should be aware of the non settlement registers to ensure there had been no loss of consumption and that settlements are accurately recorded.
Electricity North West	In the Profile Class 1 to 4 markets there is no requirement for the NHHDC's to know about the Non Settlement Registers.
Salient Systems	Yes, proactive NHHDC's will offer extended services to Suppliers, consumer tariff analyses/comparisons etc. NHHDC will remain the most convenient position in data architecture to exercise what will become a Supplier imperative (Ofgem, DECC). Further joining of interval data with NHHDC register data, MDD, wholesale data etc will be targeted to drive a wide range of data analysis objectives. Max demand register readings will still be required by NHHDC in order to support 100kW reporting.
SmartestEnergy	Yes, as part of the safety inspections process.
SSE Energy Supply	No, we do not believe that there is still a requirement.
British Gas	If NHHDCs are not retrieving or processing readings then we see no reason for them to receive NSRs but they can always ignore the information.
E.ON	Yes see above.
3.7 It may be possible to change a Meter Type (e.g. from SMETS1 to SMETS2) via a firmware upgrade. This would make Meter Type a	

remotely configurable item. Given that this is the exception rather than the rule in terms of sourcing Meter Type, it appears in the Meter Asset Details flow. Do you have any views on the provision of Meter Type?	
Ovo Energy	'Meter Type' would be better served as a field in the Meter Configuration Details. This is not only due to the ability to update meters via firmware upgrades but also due to prepayment functionality. We continue to believe that there should be a separate 'Meter Type' for smart prepayment, as there is for dumb prepayment. Prepayment will become an important use for smart meters due to the increased flexibility provided. There should therefore be a dedicated description when the meter is functioning in this mode. Without this capability the new supplier would appear to be blind in possibly not knowing that they are registering a prepayment customer. Furthermore it could increase ETs for new entrant suppliers who are not obliged to take on prepayment customers until they acquire 50,000 domestic customers and have no way of knowing pre-registration that the customer is in prepayment mode.
Western Power Distribution	These will effectively be two different data items in future. The SMETS version of a metering system installed by the MOP is only definitely correct at the point in time that it is bolted to the wall. Immediately after that it may be possible for the supplier to change the SMETS version using a software update. The Meter Asset flow data item should be renamed the "installed meter type" and the configuration data flow should contain a "supplier current SMETS version" data item.
Siemens Metering Services	The Meter Type should indicate that the meter is a Smart meter. We would suggest that it may be useful to have another data item to track the SMETS version. (as mentioned in response to 3.2)
TMA Data Management	It does not make sense to go to the trouble of creating new flows for smart metering but having the structure of these new flows flawed from the start. If it is possible to change the Meter Type remotely, even as an exception, rather than a rule, it should be catered by specifically created for smart metering flows.
Gazprom Energy	No comments
Haven Power	No comments
Total Gas and Power	
EDF Energy	It is not yet clear what the difference between future versions of the SMETS might be, and whether meters might be upgraded from one version of the SMETS to another through a firmware upgrade. Given the uncertainty in this regard we would recommend that the meter type should remain as part of Meter Asset Details and should be reflective of the status of the asset at the time it was installed. We believe that even if such a remote upgrade were possible, the proposed changes to registration dataflows under the MRA to support smart metering would account for this. These changes define the meter type/SMETS version as a Supplier owned data item, so if the Supplier were to upgrade the meter from one version of the SMETS to another, they would be able to reflect this in MPAS

	via the use of a D0205. We do not believe that the MOA, NHHDC or LDSO would need to know about any such changes to the meter type based on a firmware upgrade. Specifically, in the case of an MOA, the existing meter type would not matter in the case of a meter replacement as they would be required to install a meter that is compliant with the current version of the SMETS at the time, whatever was currently installed at a metering point.
Enterprise Managed Services	Question not clear – who is providing the Meter Type?
ScottishPower	We believe the Supplier should have the responsibility for maintaining and distributing this information.
Lowri Beck	Lowri Beck agrees with the concept of changing the meter type if the meter has been remotely upgraded and therefore believes that the MOA should receive this update via a new set of Meter Asset Details along with the Meter Configuration Details. If the upgrade requires additional equipment to be taken as part of any future site visits then the MOA will have to be updated with the change. On such instances when a meter type changes from SMETS1 to SMETS2 following the receipt of Meter Configuration details, would this also warrant a meter read at the time of the meter type change and a D0010 sent to the NHHDC? In addition could there be a possibility of creating a data item for meter type change date which would highlight the meter for example changed from a SMETS1 to a SMETS2.
Northern Powergrid	From a Distribution perspective we have no concerns but can see some potential issues from a wider perspective. Information that this process has taken place and what type of instrument is on site should be visible to all parties who have a contractual interest or may have to interact with customers where this change has taken place. In doing this the industry will ensure that information provided to relevant parties and customers is correct at the time of the customer interaction.
RWE Npower	Confirmation is required if Remote Disconnection Capability is allowed in SMETs, if it is then we believe that the Meter Type should be included in both flows. What impact would this change have to certification during this upgrade?
Electricity North West	Any configurable updates to the Meter Type the Supplier should be responsible for distributing this information to all parties, via the new Meter Configuration flow This adds more weight to the MOA's argument of having the new Meter Configuration Details flow as they will be able to update their

	asset records if the Meter Type has been configured remotely or as stated in Q3.2 there should be a Supplier to MOP instance of the 'Meter Asset Details' dataflow if the 'Meter Type' has been updated remotely.
Salient Systems	Configurable item at the asset entity compromises role of MOA as creator of asset data. Reinforces requirement for MOA custodianship of all MTD, irrespective of creator. HHT facilities at MOA, hopefully licensed components provided by DCC, will need to be cognisant of firmware versions in place at maintained SMS.
SmartestEnergy	I would suggest this is further included in the proposed configuration flow and mandate the Supplier to send the configuration details to the MOA. This way both the Supplier and MOA always have the latest view of Meter Type.
SSE Energy Supply	We believe that the population of Meter Type on the new Meter Asset Details flow is appropriate. Whilst changing the Meter Type from SMETS1 to SMETS2 via a firmware upgrade is remotely configurable, this does not necessitate a change in the physical configuration with respect to tariff, for example. The Meter Configuration Details flow will contain the relevant information to enable parties to understand the configuration of the meter.
British Gas	We agree that it may be possible to change the Meter Type via a firmware upgrade. In view of this we should consider whether it is appropriate for the Meter Type to appear in the Meter Asset Details flow.
E.ON	
4.1 Would you favour standard industry flows for installation (work management) requests/responses or bi-lateral Supplier-MOA arrangements? Please provide the rationale for your response.	
Ovo Energy	Yes, as the D0149 & D0150 are already being replaced it would make sense to keep the D0142, but extend the information that can be included to allow suppliers to request that additional equipment and/or work needs to be undertaken. This could be restricted to a single additional and optional field (based on a 'Retrieval Method' of 'R' being chosen) with data items for gas meter, communication hub etc. The most important data for us is the co-ordination of the gas and electricity installation requests, so including this data will allow the MOA to cross reference the D0142 to the gas ORJOB. It would have been useful if a dialogue could have been entered into between the electricity and gas industries to discuss these issues. This would seem to be a sensible proposition which seems to have not been pursued .
Western Power Distribution	Bilateral arrangements are probably fine for big suppliers and their MOA's but this may force smaller participants to have to "fit in" with arrangements over which they have little control. Therefore the views of the smaller participants should be key as to whether or not a standard flow is desirable.
Siemens	We would favour standard industry flows for installation (work management) requests/responses. We believe that this is an industry

Metering Services	requirement as most MOAs, small Suppliers, and large suppliers that outsource smart meter installation work will all require this.
TMA Data Management	This is more of a MOA/Supplier question. However given the complexity and possible variations it might be more appropriate to use bi-lateral Supplier MOA arrangements.
Gazprom Energy	No comments
Haven Power	We feel that standard industry flows would be far better than bilateral arrangements where keeping track of data could become time intensive and expensive for all concerned. Bilateral agreements could make sharing information on CoS more complex as it is unlikely that all parties will have agreements in place with each other and there may be delays in agreeing terms and processes. Industry flows will help to ensure consistency of information and for across all suppliers and MOAs in a way that bilateral arrangements cannot and risk being modified by multiple commercial agreements.
Total Gas and Power	
EDF Energy	EDF Energy believes that there should be a standard industry flow for installation requests and responses that will provide the required data and which will set out a best practice view of the data to be exchanged and the associated SLAs to send and execute work. For those parties that will have multiple interfaces (for example a Supplier that appoints multiple MOAs or where the customer is opted out of DCC operation and has appointed a Metering Services Provider (MSP)) this will then provide consistency and avoid the costs associated with managing multiple bi-lateral arrangements. This flow must be fit for purpose; parties would then choose to implement bi-lateral arrangements for communication of this information based on their specific commercial and operational requirements, not because the flow is not capable of capturing the required information.
Enterprise Managed Services	Favour Standard Industry flows – this allows for clear, consistent and standard audit trails.
ScottishPower	Our aspiration is for industry standard data flows to be used to minimise the costs of developing bespoke interfaces potentially between a number of MOAs. We anticipate that work will be undertaken by MOAs in response to a number of different types of request, some of which may be standard, others being bi-lateral arrangements.
Lowri Beck	Lowri Beck favours standard industry flows for installation requests / responses rather than having bi-lateral Supplier-MOA arrangements, we believe that bi-lateral arrangements will cause further problems with misunderstood requests, incomplete requests,

	asset tracking, missing results etc. Implementing/updating standard industry flows to include smart related data items will allow suppliers to request precisely the equipment, devices and meters they require to be installed onsite. If bi-lateral agreements are in place the MOA will have to match the job request data flow with an additional request in a different format, potentially resulting in a mismatch of data.
Northern Powergrid	We would favour standard industry flows. Bi-lateral arrangements may well exclude other parties that may be essential to ensuring the customer experience is the correct one.
RWE Npower	Yes – Standard industry flows. For ease of development and maintaining fair competition the flows should be standardized to ensure everyone operates on a level playing field.
Electricity North West	As an LDSO we are not impacted by Work Management but believe that by having standard industry dataflows and processes each Market Participant is aware of their responsibilities and the timescales in which they need to carry out the activities. This provides a good industry practice for all Market Participants to adhere to. If bi-lateral arrangements are to be in place, then the MOA may have different arrangements with different Suppliers and the processes and obligations become fragmented. The smaller MOA agents may not be able to compete in this type of market and therefore could be detrimental to agent competition.
Salient Systems	Standard industry flows which additionally accommodate Supplier coded repeating group specifications of service/asset requirements. Supplier defined mappings of service codes to service/function requirements would be configured and interpreted at MOA to call off WM actions and potentially may be further transformed at MOA to form 'enabling' requests to DCC in lieu of Supplier where necessary. The flow mechanism/format required here, hopefully, would be similar to whatever scheme is adopted to accommodate Supplier>DCC requests. Responses to Supplier – current standards of returning only anomaly flows to persist as required.
SmartestEnergy	Yes – standard industry flows would maintain control and consistency. Bi-lateral Supplier/MOA arrangements could lead to different standards in the way details are recorded and present a risk to settlements in the long-term.
SSE Energy Supply	We do not believe that any changes should be made to the D0142 flow with a bilateral Supplier- MOA arrangement for work management. Making changes to this flow will add complexity and delay the implementation of this change.
British Gas	Given that there a various OFGEM standards around meter work and consumer compensation it would be logically to have standard flows that could be used for this purpose. This has already been suggested at IREG.

E.ON	We would favour bi-lateral arrangements as instruction is not likely to be specific to site, but to the conditions encountered. We would therefore expect the MOA to take specific pre-determined actions.
4.2 If you favour standard industry flows for installation (work management) requests/responses, how do you anticipate requests being made for single visit dual fuel smart installations?	
Ovo Energy	Please see the response above regarding an additional field in the D0142 to notify the MOA that they need to cross reference with the ORJOB for gas.
Western Power Distribution	Presumably Supplier would need to send a "smart gas work" flow and a separated "smart electricity work" flow.
Siemens Metering Services	A new standard industry (alternate to D0142) accompanied by an ORJOB sent by the Supplier to the MOA/MAM. The new flow will allow the Supplier to tell the MOA what smart metering equipment to install / replace.
TMA Data Management	n/a
Gazprom Energy	No comments
Haven Power	No comments
Total Gas and Power	
EDF Energy	EDF Energy believes that there will always be limitations as to how effectively a dual fuel smart metering rollout will be able to work where the industry is still very much managed along single fuel lines, with little if any convergence in the processes. We believe that the DECC smart metering programme has missed opportunities to further this convergence, especially through the design of the DCC which created the opportunity for the centralisation of data management for both fuels. As a result, Suppliers will continue to have to manage two separate sets of processes for a single customer, which we believe is both inefficient and costly. While it remains the case that there is no convergence in processes, the only viable option that we believe could be used to ensure that single visit dual fuel installs will be able to be requested (other than via bi-lateral arrangements) is for the Supplier to send their MOA two separate flows for installation of gas and electric meters with identical details (address, time bands etc.). These flows would then need to be linked together by the MOA to ensure they form part of a single visit; ideally this would be through the use of the Unique Property Reference Number (UPRN). However, not only will this data item take some years to fully implement within registration systems, but it is not currently proposed that this will be used on flows sent to the MOA, only those from the Distributor (and their MPAS) to the Supplier. In the absence of the UPRN this linking of the two fuels might be achieved through the use of a

	reference number provided by the Supplier or similar mechanism.
Enterprise Managed Services	Potential amendment of the D142 to include the MPRN as an indicator that it is a Dual Fuel Installation request.
ScottishPower	A single dual fuel visit request may be made in a number of different ways. If separate (i.e. gas and electricity) standard data flows then there needs to be a mechanism by which they can be linked e.g. a common job number.
Lowri Beck	• Lowri Beck envisages that suppliers will generate a D0142 for a single visit dual fuel installation and provide information about the gas supply (MPRN, UPRN) in the request to allow the MOA to match both fuels. If a site visit was successful and smart meters have been fitted the both the electricity (Meter Asset Details flow) and gas (ONJOB) data flows will be generated. • If the request is for single fuel gas then we would expect to receive an ORJOB only. If a site visit was successful and a smart gas meter has been fitted the gas (ONJOB) data flow will be generated. • If the request is for a single visit dual fuel installation and the gas appointment is currently an NGM site we would expect to receive a D0142 and an ORJOB. If a site visit was successful and smart meters have been fitted the both the electricity (Meter Asset Details flow) and gas (ONJOB) data flows will be generated.
Northern Powergrid	The flows for installation of a smart metering system should be enduring and in line with those of the mass rollout.
RWE Npower	We believe two flows will be required however they will need to contain a linking field. This would still require a commercial agreement to ensure the jobs occur at the same time as a dual fuel job.
Electricity North West	Dual Fuel installations should be carried out on a bi-lateral arrangement between Suppliers and MOA's.
Salient Systems	Guidance/clarity still required from programme as noted, but action party role could be accommodated in standard flow. Questions remain around communication of MOA/MAM parties where actions must be coordinated by lead party.
SmartestEnergy	In summary, we envisage there being a new version of the D0142 with an additional field called "installation type" – suppliers can stipulate if it is a single or dual install. This would also need to be reflected in the Gas counterpart. Clearly, this would require a detailed review appropriately define the process.

SSE Energy Supply	The existing industry processes and data requirement are different and are under separate governance bodies for electricity and for gas. We expect the normal processes to continue and it is up to the agents to coordinate appropriate site visit activity and for the supplier and agents to make commercial arrangements to manage dual fuel.
British Gas	The answer to this would depend on the level of changes expected to be made to gas processes. Ideally there would be one request flow but a less radical option would be to have a option 'gas group' which would include some basic information such as MPRN and for the agent to 'match' the 2 jobs into a single visit.
E.ON	
4.3 If you favour standard industry flows for installation (work management) responses, do you think other equipment should be included in the Meter Asset Details flow or could this be provided in a separate flow and potentially implemented in longer timescales?	
Ovo Energy	Yes, we believe this would be a sensible approach.
Western Power Distribution	Further consideration needs to be given to who needs to know about any additional equipment installed. If the parties requiring the data are the same as the ones getting the Meter Asset details flow then it would make sense to add it to the new flow. If the information is only of interest to Supplier/MOA and MAP then a new, additional flow may be better.
Siemens Metering Services	Yes, other smart assets should be included in the Asset Details flow and the D0303 flow. Building on existing flows will facilitate competition in the market. The provision of the more comprehensive Asset Details flow will then inform Suppliers which assets were installed hence letting them know if the actual work differed from that requested e.g. if an IHD had been left or had not if refused
TMA Data Management	n/a
Gazprom Energy	No comments
Haven Power	The Meter Asset Flow should be reserved for the meter. We believe that a separate flow similar to a D0313 sent in conjunction with the meter technical details containing information on the IHD, communications hub etc. would be the better solution. This separation would allow for easier data extraction if it needed to be communicated to other parties and allow IHD fields to be added / removed as the requirements around these evolve with time
Total Gas and Power	
EDF Energy	EDF Energy does not believe that there is sufficient clarity relating to the information that will be available to parties via the DCC to

	be able to answer this question with any certainty. There are also issues about what data parties require to be able to discharge their functions. The other devices that might be installed are specifically the communications hub and the In Home Display (IHD), although this might also include auxiliary load control switches that are connected to the Smart Metering HAN in a customer's premises. We believe that the DCC inventory (as discussed within the BPDG) should hold all of the critical information relating to any device connected to a smart metering system (potentially excluding the location within the customer's premise) and this information should be available to those parties that would require it for operational purposes. This would not only include the MOA and the Supplier, but also the Meter Asset Provider who is the actual owner of this asset. We recognise that this access to the DCC is subject to a DECC consultation. We believe that the DCC should be the conduit for information about the assets installed and connected to a smart metering system, both to the Supplier and to the MOA, and that the DCC should provide details of all the assets forming part of the smart metering system on CoS.
Enterprise Managed Services	Should be included in the Meter Asset Details flow, not necessarily as mandatory data items.
ScottishPower	We consider that other equipment should be included in the Meter Asset details flow which is provided in response to a work request.
Lowri Beck	The Meter Asset Details flow proposed is currently at meter level only and should probably remain this way. Obviously, it is possible that other devices / equipment installed at a site may develop faults etc. and require an exchange without any need to manipulate the meter. Therefore we believe that as the other devices / equipment is a separate part of the system to the meter they should be detailed in their own separate flow.
Northern Powergrid	These flows should track the installation process and provide information as to the equipment on site and stage of installation. We believe that all components of the smart meter installation should be contained within the standard industry flows.
RWE Npower	Standard industry flows should be used and the MAD should contain all SMS information.
Electricity North West	As an LDSO we are not impacted but considered that the D0142 should be updated to include a new group for other equipment and the new Meter Asset Details dataflow should have this new group included to enable request/response for these items and a way to communicate between the Supplier and MOA's. When the Supplier distributes the Meter Asset Details dataflow to the NHHDC and

	LDSO's this other equipment group should be excluded. Where a meter exchange occurs from SMETS1 to SMETS2 how is the Communication Hub communicated between parties as there is a requirement to change the hub?
Salient Systems	Industry data model, prior to registration services at DCC, would benefit from SMS entity with appropriate attributes, to include other key equipment etc, but as noted in section 4, where should it go ? Preference would be not to attempt to compromise any electricity flows at all with additional equipment data. Rather, consider companion flow to asset flow to accommodate this data, including other MSID's. Implicates some interim central service to receipt and distribute changes to parties depending on who turns up to maintain an SMS – MOA or MAM. WG4 might be encouraged to bottom out issues here.
SmartestEnergy	We believe this should be included in the Meter Asset Details so that Suppliers can track all assets under SMETS.
SSE Energy Supply	Equipment other than the metering, such as IHD and Comms Hub, should be by bilateral arrangement between the Supplier and the MOA. We do not believe that there is a requirement for a separate flow or inclusion in the Meter Asset Details.
British Gas	Multiple flows from a single activity (meter work) will always mean that there is a level uncertainly for the recipient because they will not know if the lack of a flow is due to device not be installed or a missing flow. We would suggest that 'other equipment' is added as an optional group after the meter removal group and at the same level.
E.ON	
4.4 If you favour standard industry flows for installation (work management) requests/responses, what information do you think should be included in these flows?	
Ovo Energy	As noted in the answer to question 3.7, we would request that the Meter Configuration Details highlight smart meters in prepayment mode. Furthermore, It would be a sensible step to include additional devices in the Meter Asset Details, especially as this is a new flow and the scope allows us to include these details during this development. This could be a single additional data item, with an install date and serial number field (optional data) that allows duplication within the flow if the meter includes more than one piece of additional equipment. As we're obliged to offer IHDs to customers as part of a smart install, which they're not obliged to accept, it would be sensible to include these details to provide additional customer data to the new supplier during the CoS process. This will reduce the likelihood of

	a duplicate IHD needlessly being sent to newly registered customers.
Western Power Distribution	This needs further detailed discussion.
Siemens Metering Services	No comments
TMA Data Management	MOA/Supplier question
Gazprom Energy	No comments
Haven Power	No comments
Total Gas and Power	
EDF Energy	Assuming that all customer related information (address, telephone number, password etc.) is already held by the MOA as per current industry processes, the request for installation would need to include: The details of the smart metering asset(s) to be installed (which assets if pertinent, what type i.e. specific IHD for a customer with visual or auditory impairment). The details of how that meter should be configured in the case that it is not possible to connect to the DCC via the WAN. The response should include: Which assets were actually fitted (it might not be necessary to install a comms hub if there is already one on site i.e. due to a gas first install). Whether the IHD was rejected by the customer and if so why (for compliance with licence conditions). Any other information pertinent to the Supplier, specifically in relation to compliance with the SMICoP and requirements around communication to the customer as part of the installation visit.
Enterprise Managed Services	Specific Data Items for Installation requirements i.e. not free text in current additional information field
ScottishPower	Requests should cater for a range of different job types and should include Customer data; Appointment data; Location;

	Existing asset details; Assets types to be installed; and Job type e.g. Single or dual fuel install. The response data flow (Job Completion Details) was described in Section 3.4. The data flow should include data relating to all assets installed as a part of the smart metering system. We support the inclusion of the proposed data items, namely: Date of Meter Installation; Meter Location; MPAN Core; Meter Type; Manufacturer Make & Type; Meter Id (Serial Number); and Date of Meter Removal. In terms of specific data items we suggest that the "Manufacturers Make & Type" are split in to two separate data items; a job request identifier is included; and "device id" is used instead of "meter id". It may be necessary to consider each asset to determine whether additional attributes are required for each asset e.g. a PPMID may be wired or wireless, Comms device – WAN signal strength. Further data items are required, these include: partial job completion data; additional work carried out; reasons for a customer declining an IHD; reasons for refusing a smart meter; data privacy consent; and the identification of suitability for the operation of a smart PPM
Lowri Beck	Lowri Beck suggests that information relating to WAN / HAN technology requirements, additional equipment / devices required, meter

	variants etc would be required within the request flow to allow a MOA to plan for the site visit and to ensure minimum disruption to the customer. We would also expect all smart devices and equipment installed onsite to be within a new data flow generated to the Supplier.
Northern Powergrid	We are in favour of utilising standard industry flows allowing parties involved in installation allowing share issues with their supply chain. In addition, other parties being asked to provide services (e.g. no supply calls) to the end customer without delay ensuring, they have all the information required to undertake subsequent remedial works. These flows should track the installation process and provide information as to the equipment on site and stage of installation.
RWE Npower	We favour the use of standard industry flows however will require further time to prepare a list of data items for consideration.
Electricity North West	As an LDSO not sure what information is required but assume it is what is classed as 'Other Equipment'.
Salient Systems	As per 4.1
SmartestEnergy	This is already covered in our answer to 4.2.
SSE Energy Supply	None as per our response in 4.1. We do not believe that any changes should be made to the D0142 flow.
British Gas	To allow OFGEM standards to be monitored the response flows need to include visit time as well as date.
E.ON	
4.5 Do you see any distinction between the arrangements for requesting smart installations during the mass roll-out and those for subsequent installations/replacements/removals? If so, what bearing do you think this has on developing a new process (and dataflows) and the timescales for such development?	
Ovo Energy	No, we envisage that the initial install and subsequent meter replacements should be treated in the same way. However, it's clear that we need a process which allows a request to just replace or install additional equipment and not the meter, which may not be the case during the initial install. .
Western Power Distribution	We see no distinction but, as for 4.4, this requires more detailed discussion which we have not had time to do.
Siemens Metering Services	No
TMA Data Management	MOA/Supplier question

Gazprom Energy	No, D0142 in electricity installations could be amended to include the distinction. There isn't a need for new flows.
Haven Power	No comments
Total Gas and Power	
EDF Energy	EDF Energy does not believe that there should be any distinction between a request to install a smart meter and any subsequent installations/replacements/removals required at that metering point. This is not currently required for the D0142 dataflow which covers all scenarios and there is no clear reason why this distinction might be required for smart metering. This would only be the case if the original installation was requested on a dual fuel basis, with subsequent work more likely to be single fuel. As per the answer to question 4.2, there is no plan to achieve this level of convergence between gas and electricity processes in the short or medium term.
Enterprise Managed Services	Yes – Portfolio Management similar to current Recert programmes would be preferable for mass roll-out with requests from Supplier for subsequent installations/replacements. If new data flows are developed then timescales would be impacted.
ScottishPower	We expect work to be undertaken by MOAs in response to a number of different types of requests, some of which may be standard, others being bi-lateral arrangements between Suppliers and MOAs. We believe that standard flows should be in place to support the mass roll-out.
Lowri Beck	Lowri Beck would suggest to not to differentiate between mass roll-out and subsequent installations/replacements/removals. If new flows or processes are to be implemented for subsequent installations/replacements/removals they would have to be implemented in time for the start of mass roll-out, as this type of work will occur when new smart meters are installed at the beginning of the roll-out.
Northern Powergrid	There will and should be a significant difference between a mass rollout and what is essentially business as usual. A successful mass rollout should have generated a positive experience therefore; customers are likely to expect that level of service as business as usual. In reality, customers are likely to expect even higher standards of service on any subsequent interaction with the energy industry. These secondary services will need to be in place to support the mass rollout from the beginning in order to resolve any issues created by the installation of the new smart metering equipment.
RWE Npower	No – One process for works for both.
Electricity North	We do not see any distinction between arrangements for Smart installations for Mass Roll out and those for subsequent

West	installations/replacements/removals. The only issue is the Dual Fuel scenario, a new process maybe required for the rollout for Dual Fuel requests which would not be required as enduring solution and be carried out on a bilateral basis.
Salient Systems	No distinction. The D0142 flow has always been unfit for purpose in our view. Opportunity to migrate to a more structured approach to codifying requested service(s) and configuration requirements would be welcomed and would contribute to MOA's being able to operate in lieu of Supplier in terms of mapping/constructing data interfaces to DCC (which we would expect to find will be part of the de-facto processes adopted at supply companies with vertically integrated MOA's in any case).
SmartestEnergy	We do not see any distinction between these two scenarios.
SSE Energy Supply	No, we do not see why there should be a distinction. We should build as robust a new process as possible with what we know now.
British Gas	The key distinction we see between roll-out and post roll-out work will that during the roll-out the comms equipment will be installed but that it will not necessarily need to be changed subsequently.
E.ON	No
4.6 Please provide views on how and when asset tracking for smart equipment should be delivered. Please provide any requirements in this area that you consider warrant a standard industry solution.	
Ovo Energy	It would be best practice to begin the asset tracking during the mass roll-out, so these details are collected from the outset. This is yet another reason why these details should be included in the Meter Asset Details to ensure that they can be tracked from a single source of data.
Western Power Distribution	We need to review what is going wrong with the D0303 flow notifications and then develop a process which will work better. It should not be that hard for MOA to inform the MAP when they install or remove something and beyond suppliers to inform the MAP when they are responsible for paying rental.
Siemens Metering Services	The inclusion of standard flows will allow MAPs to be informed of the movements of their smart assets It is looking as though MAPs may not have direct access to the DCC and will be reliant upon industry flows. It would be far too complex to have bi-lateral arrangements between MAPs and all Suppliers and MOAs in order to receive updates on assets. Similarly this would avoid an additional MOA to MOA flow. MOAs would be made aware of the smart assets at sites where they are appointed when they gain sites. Without standard industry arrangements all parties will have difficulty knowing what equipment is installed where and what happen to equipment when it is

	removed. Tracking of assets is also very important from a product recall perspective.
TMA Data Management	MOA/Supplier question
Gazprom Energy	Special asset flow to and from new and old asset provider which will allow tracking of the asset.
Haven Power	An asset tracking solution needs to be in place as meters are installed or a robust interim solution needs to be developed. Implementing asset tracking after the roll out has finished will have limited effectiveness.
Total Gas and Power	
EDF Energy	EDF Energy considers that there is too great a level of uncertainty about functionality of the DCC and the availability of asset information, as well as about asset ownership, to be able to make a full assessment of this question. We believe that the DCC should be the mechanism by which parties are able to track their assets. All components of the smart metering system that connect to the Smart Metering HAN in a customer's premises will need to be 'trusted' by the DCC and managed by the DCC as part of the smart metering network. The DCC would therefore seem to be in the best position to provide information about which assets are installed and where. The actual data available from the DCC inventory (as referenced within BPDG documentation) and who is able to access that information is not clear and developing any solution without this certainty has a significant degree of risk. There are also questions over who might own the various assets that form a smart metering system and what information they might need. The key components of an electricity smart metering system are the meter, the communications hub and the In Home Display. The flow required for the tracking of a meter by the owner (the MAP) for charging purposes exists now and, as noted in section 2.5 of the consultation document, there is no proposal for this to be changed. With regard to the In Home Display, this asset is owned by the customer after installation and we are not aware of any need to be able to track this for invoicing purposes, as you would a meter. It also needs to be recognised that the IHD will not always be installed by the MOA, but may be sent out by post to a customer to 'self pair'. A Supplier will only know if an IHD is actually connected to the smart metering system via the DCC, no market participant other than the DCC will ever be able to track this asset and it is not clear why this might be necessary. It is currently proposed that the communications hub is owned by the Communications Service Provider, but there is no indication as yet as to what information that party might want, or need, to be able to track this asset, or whether they would need to be able to

	obtain this from the DCC itself. On this basis we would recommend that no further work is done on progressing changes to be able to track other non-meter assets until the scope of information to be managed by the DCC and made available to other market participants (which we believe should include MAPs) is absolutely clear.
Enterprise Managed Services	If all the smart equipment is contained within the same data flow it would make asset tracking simpler.
ScottishPower	On the basis that asset providers do not have access to the DCC, there is still a requirement for asset data updates including Change of Supplier information to be passed to them. Additional valid values for the "Associated Equipment Type" used in the D0303 should be defined which would facilitate its use in informing asset providers of other assets. As discussed in previous sections we believe that the Supplier should be responsible for providing asset data updates to the asset provider. We anticipate that the asset provider will require data over and above that currently included in the D0303 data flow, e.g. the firmware version.
Lowri Beck	Lowri Beck suggest that asset tracking data flows and processes for smart equipment should be in place for the start of mass roll-out 2014. Smart Metering equipment and devices will cost more due to the requirements of smart metering and if standard tracking data flows are not implemented for the start of mass roll-out the rental charges will increase. Higher rental charges will be forced upon suppliers due to the risk factor of MAPs not being able to track their assets and this could be passed down through to the customer.
Northern Powergrid	Asset tracking is already an issue for suppliers and meter asset providers (including for LDSOs who have provided meter assets) both for conventional and smart meters; an issue that is adversely affecting the costs of those parties. Ofgem and DECC are expecting industry parties to work on solutions to address any failings in asset tracking. While asset tracking is worse for gas meters there are still issues in tracking electricity meters that should be addressed prior to the smart roll out. We therefore believe that effective tracking solution(s) should be delivered as soon as possible. The wider industry solution is also essential to create a level playing field and ensure that customers do not face a problematic experience on change of supplier. In addition to this, industry parties must have access to the relevant data they need to run their businesses and delivery chains and appropriate visibility as their customers experience a transfer to the new smart equipment and experience. We would welcome the opportunity to contribute to any process development in relation to asset tracking including attending any working groups on the topic. Examples of further data requirements for asset tracking would be Firmware versions and updates, latest software installed on the

	meter, meter failures in order to identify potential batch faults, damaged and suspected meter tampering. In addition we would like to improvements to information relating to meter change events. Current descriptors do not provide enough information therefore improving the level of data provided would have a beneficial impact on asset tracking.
RWE Npower	To support effective deployment an enduring solution is required from day one as Suppliers will be required to know this information. Visibility is required regarding asset types within the DCC asset register. Consideration should also be given to a robust solution in event of comms failures
Electricity North West	Further information needs to be provided before a view can be made.
Salient Systems	Soon as possible, doesn't need to wait until 2014. Requirements issues, as per 4.3, additional asset provider issues. Interim extended ECOES type facilities.
SmartestEnergy	We have already stated that asset tracking should be included in the industry flows so that Suppliers can retain control
SSE Energy Supply	Asset tracking will be a separate arrangement within industry codes (other than BSC & MRA) and/or commercial. And, therefore, not for discussion here. This will not impact settlements.
British Gas	Once assets of any value are being installed and they are not owned by the installer then ideally asset tracking needs to be in place.
E.ON	
5.1 Do you consider that there is merit in the proposal to separate responsibility for the closing and opening Change of Supplier readings? Please provide the rationale for your response.	
Ovo Energy	No, this seems to complicate matters and could potentially cause issues which impact the accuracy of the data the customer receives and the time it takes to provide them with this data. Once again any issues of this type could tarnish the delivery of the smart metering project and affect customer confidence. If the D0086 is still to be utilised, which has not been discussed within this consultation, we would expect only actual reads to be triggered. However, we need to be mindful that there could be issues with faulty meters which span the CoS process, leading to an estimate being required which has to come from a single source. The most sensible process is to have the read details and the config details triggered by the DCC to the new NHHDC and the old supplier. This will also have an impact on the Issue 45 working group currently in progress with I. Bringing this question as a specific agenda

	item on the next session would be prudent.
Western Power Distribution	No comments
Siemens Metering Services	No comments
TMA Data Management	Yes. The NHH COS process is very complex and breaks down in an alarming number of instances. Separate responsibilities will remove the need for the COS read dispute process it will also bring the NHH process closer to the more efficient and proven HH process, the benefits of which should far outweigh the potential risks in consumption overlaps and gaps.
Gazprom Energy	No, this will cause all manner of issues between suppliers and queries from customers. It would require a significant industry change that would confuse customers due to the possibility of overlapping readings and the ability to change a configuration on CoS without reasoning.
Haven Power	No, we strongly feel that this proposal would be detrimental to settlements and the customer experience. There would be no visibility of whether the customer is being billed to the same reading by the old and new supplier which risks suppliers taking readings that do not match, whilst in most cases this would be a small loss per individual meter, taken as a whole this could have a large impact– especially with profile class 3-4 where a significant amount of their usage could be at night (such as bakeries). There is also the question of what happens if one supplier cannot obtain a read until a significant period after the closing read e.g. in the event of a communications drop out. We feel that this process should not be changed in a way that introduces increased potential for inaccuracy and results in a negative customer impact.
Total Gas and Power	
EDF Energy	EDF Energy strongly supports the intention to remove the dependency that the New Supplier and Old Supplier (and their Agents) have on the transfer of data between the Supplier hubs to be able to process opening and closing readings. Based on our operational experience as an NHHDC, the most significant factor impacting the New NHHDC's ability to generate an accurate D0086 is the availability and accuracy of meter reading and consumption history from the Old NHHDC. Currently the New NHHDC requires the historic data from the Old NHHDC to be able to validate an actual reading for use as a D0086, or to deem a reading in the absence of an actual reading. Our internal reporting shows (and the PARMS reporting reflects this) that there are significant numbers of metering systems where this data has not been received within the expected timescales, and in many cases for more than 30 working days after the Supply Start Date. Given the functionality of a smart meter and the availability of accurate meter readings we do not believe that this transfer of data is

	required to be able to verify that the reading taken by the New Supplier is valid and appropriate for use as a D0086. There should be an inbuilt level of confidence that the reading is correct based on the source (i.e. the smart meter), and the ready availability of subsequent reads on a frequent basis will provide assurance that this reading is consistent with the consumption at that metering point. With regard to the diagram in section 5.4, we would strongly disagree with the need to transfer the EAC from the Old NHHDC to the New NHHDC. Not only dos this mean that the dependency on the transfer of data between NHHDCs is retained, but it is more likely with smart metering that the New Supplier will change the SSC on the Supply Start Date, which renders the EAC provided by the Old NHHDC useless as it would not apply to the new SSC. We would recommend that the New Supplier should be able to pass EAC information to the new NHHDC for use in settlements as part of the CoS process. This would either be based on the EAC provided in the D0311 dataflow sent by the Old Supplier, or a determination of the likely EAC that the customer would have, which is the process used for populating the EAC on the D0052 dataflow on new connections or for a change of SSC. This would allow the New Supplier and New NHHDC to be able to start processing data into the settlements and billing processes on a much timelier basis than current processes allow. We believe that putting readings obtained from a smart meter through the current CoS reading processes for legacy metering will mean that D0086s will be subject to the same, if not worse, delay as currently, which will then create a poor customer experience and mean that Suppliers are not able to realise the full benefits of implementing smart metering.
Enterprise Managed Services	No impact on MOA as out of the loop once MTDs issued to new Supplier and NHHDC
ScottishPower	Yes, this approach has the benefit of removing the dependency between Suppliers and eliminating the transfer of data between agents. Eliminating data transfer between agents will simplify current processes and reduce the associated transaction costs.
Lowri Beck	Lowri Beck believe that there is merit in separating the responsibility for the closing and opening of Change of Supplier readings as the onus of processing both the Loss and Gain reads are placed with the old and new Suppliers. However, this is on the assumption that the actual read has been taken by the DCC and the suppliers are picking up the read values from the DCC. As the reads will come direct from DCC to the Supplier they then have the opportunity to view that read before it is sent on and validated by the DC.
Northern Powergrid	We believe during the transition that compliance checks are completed to ensure that levels of accuracy are not lost by separating ownership of the data and potential customer experience.
RWE Npower	Yes – Subject to a settlements control.

	By doing this it would mean that the new supplier does not need to be able to support the old supplier's configuration on the meter to capture readings. The new supplier can start their account with a new configuration, if required by the customer. However we need to ensure that in the event of change of NHHDC accurate validation takes place, possibly by using a non settlement cumulative register to guarantee consumption is captured.
Electricity North West	From an LDSO point of view there is no merit in the proposal of separating responsibility for the closing and opening CoS reading, it just adds more complexity to the process. This can also as stated in the Consultation cause gaps and overlaps in consumption when the idea of the Smart world is to have accurate data. A process could be introduced that the DCC notifies the new and old Supplier of the closing and opening CoS read at 00:00 on the day of the new Supplier registration, the Suppliers may have to put in the request but this could be automated as part of the registration process, this would ensure there are no gaps in consumption.
Salient Systems	Our overriding principle would be that there is one set of reads taken by someone at a point in time, and they will provide the agreed CoS finals/initials. If more than one set available then rules for new DC to follow, as is case now, to pick the CoS set. New DC would operate as they do currently, including accommodating SSC change coincident with CoS. This proposition predicated upon current MOA being in position to provide new DC with all relevant MTD, including configuration data, so reinforces our proposition for MOA custodianship of all MTD.
SmartestEnergy	No, we believe this could lead to potential gaps in consumption and settlement allocation. The main issue relating to the COS process in today's market is the high proportion of deemed readings. In a smart industry this issue should be eliminated meaning the performance of the existing process should improve significantly.
SSE Energy Supply	Yes.
British Gas	Yes. By removing the requirements of read histories to be sent limits data exceptions and delays. It does means that the New supplier can effectively change the configuration of the meter on day one if it so chooses, however this would need to be assessed whether it causes any gaps / overlaps in Settlement volumes – see 5.2 We don't see the need for EAC to be transferred between NHHDC's. Accept that we will start off our supply period using an industry default but this will be at most for one month at which point a read will be gained from DCC (Assuming that's the frequency) and an AA created. This would remove additional flows between old and new agents which again is a cause of exceptions and issues.
E.ON	Yes, there should be no dependency on either of these reads.
5.2 If such a proposal were to be adopted, how would you view the risk of gaps/overlaps in the volume of energy settled? How could	

this risk be mitigated?	
Ovo Energy	The best solution is to not follow this process due to the issues raised in 5.1 as we are concerned that this will inevitably adversely affect settlements.
Western Power Distribution	No comments
Siemens Metering Services	This already happens today even though the responsibility lies with the new supplier to obtain the read. This risk could be mitigated by the DCC Service automatically obtaining a COS reading.
TMA Data Management	As mentioned in the MTD_COS_Smart_changes consultation document, an increase use of Time of Use tariffs would mean that the opening and closing reads are different. Smart metering roll out is likely to increase these types of tariffs, making closing and opening reads different. The gaps might be partially or fully balanced out by the overlaps. The risk could be mitigated by ensuring that the Suppliers have to take a read within 3 working days of the Supplier end date/start date giving a maximum gap/overlap of 6 working days.
Gazprom Energy	Risk to settlement is great due to the lack of communication proposed between old and new supplier and DCs on CoS. Readings won't follow on and will cause queries from customers. Each supplier wouldn't know what read the other is using.
Haven Power	We perceive that this would be a large risk to settlement accuracy, especially if schemes like "the big switch" become frequent and the measures being taken to increase overall liquidity bear fruit. We cannot see any way that this can be mitigated.
Total Gas and Power	
EDF Energy	EDF Energy recognises that this risk exists but would question whether this risk is any more likely in smart metering processes as it is at present. Currently the Old NHHDC is reliant on the New NHHDC for not only sending the D0086, but also for any changes to that D0086 based on disputed and agreed reads. Again, based on operational experience, we have seen numerous instances where the New NHHDC has not sent the revised D0086, creating a settlement imbalance, and further examples where the New NHHDC has sent a revised reading but the old NHHDC has failed to process it. We believe that there is currently already a significant issue in terms of discrepancies between opening and closing readings, and as this area is not subject to audit under the PAF this problem has not been highlighted and quantified to date. The ideal solution to this problem would be for both the Old and New Supplier to be able to access the same reading on the smart meter, or for the DCC to take a reading on the CoS date and send that to both the Old and New Supplier. This would immediately appear to be the best way to mitigate the risks that have been identified but this is not consistent with DECC's decisions around

	access to reading data on the meter and the functionality of the DCC. We recommend that this should be raised with DECC as an issue and that they are asked to reconsider their current approach to the availability of a common reading, both from the meter or from the DCC itself, to facilitate an effective CoS process. We understand from the SMETS documentation that a single total cumulative consumption register will be available on the smart meter irrespective of which SSC the meter might be programmed to support. We would recommend that a reading taken on this register and exchanged between Suppliers should form the basis of a process to assure both parties that they have taken a correct reading that will not lead to a settlement imbalance or cause a customer billing issue. The transfer of such a reading between Suppliers should be simple to minimise failure rates, and should not be required to be received before the Supplier asks their NHHDC to use the reading as a D0086, but to give them assurance that the reading is correct once it is received.
Enterprise Managed Services	N/A
ScottishPower	The introduction of smart meters is likely to lead to an increase in a number of Change of Supply events that are coincident with a change in settlement configuration. This means that the old Supplier"s settlement account is "closed" using the final read on the old configuration, whilst the new Supplier"s settlement account is "opened" using the initial read on the new configuration. This will occur whether this proposal is followed or existing arrangements are retained. The need to mitigate risk applies in both cases. It is critical that both Suppliers have access to the same Change of Supply reading, i.e. the read taken at midnight if no configuration change on SSD or the final read on the old configuration if the settlement configuration is changed. The only link between the two sets of reads is the total cumulative import register read; further analysis is required to consider how this might be best used to mitigate risk. Consideration should be given to how any error introduced by smart meters is smeared. Performance in these areas will need to be monitored and reported upon which will in turn require governance and further performance assurance development.
Lowri Beck	Lowri Beck believe that the read should be provided by the DCC at the time of the CoS and sent to both the old and new Supplier in order to process their loss / gain. This approach would ensure that there are no gaps. On instances where there is to be a change in configuration when the new Supplier takes over any energy used from midnight of the CoS date to the configuration being applied to the meter should be applied to the new supplier.
Northern Powergrid	n/a

RWE Npower	The possible usage of a non settlement cumulative register would enable validation of consumption and ensure accurate settlements.
Electricity North West	The risk of gaps and overlaps in the volume of energy being settled is that Suppliers could end up paying more or less for their volume of energy. The data is not accurate then in time this could impact the GSP Group correction factor. There could also be a Customer impact as they could be over charged on a CoS (billed by different suppliers on a few units of consumption) which could create further enquiries. This could be mitigated by the old and new Supplier using the same reading.
Salient Systems	Risk of couple of days worth of missing settlement data, probably worth worrying about. Mitigated by DCC assuring single source of finals and initials at CoS date and distributing to, in our view, New DC.
SmartestEnergy	See 5.1
SSE Energy Supply	We envisage, as time goes on, a decreasing industry Risk around reads for Settlements, gained during a CoS. Decreasing with the roll out of first, ADM meters and subsequently Smart Meters with use of DCC, as a Settlements reading should be more easily gained. As these meters benefit from Smart functionality, SMSO services and the possibility of two explicit readings gained at specific times. The Risk decreases where both Suppliers are mandated to get a reading and where the ADM meters & Smart Meters will be able to give each Supplier a cumulative backup data to enforce the readings.
British Gas	No configuration change on CoS. We need to ensure the DCC provides the same readings to both the old and new DC. Would suggest a time of 11:59pm prior to CoS date. New configuration on CoS date. DCC would dial up the meter at 11.59 for old supplier reading. New supplier then chooses to change the configuration on day 1 so DCC need to provide the new supplier with the start reading during the day of configuration change. This will be used as the initial read for the new configuration by the new supplier. We do not see any risk to settled volumes. The only variance would be in what the customer sees on its bill from the old and new supplier
E.ON	Don't believe there is a significant risk to settlement.
5.3 What would the implications be of running a new process alongside non-smart processes for legacy metering?	
Ovo Energy	We require confirmation of this process and whether the D0086 will continue to be used. Are we going to be processing dumb and smart CoS reads using the same flow? Also it needs to be clear how the new supplier will make a request to the DCC for the opening reads.

	We believe that a simpler process would be to utilise the D0260 flow and include the DCC as an additional recipient. They would then have the available details for triggering the opening/closing reads to the relevant parties, without requiring a direct request from the suppliers.
Western Power Distribution	No comments
Siemens Metering Services	This could be risky as the systems changes to support these changes are significant because of having to deal with both sets of processes.
TMA Data Management	The implications can only be reflected upon if a new process is proposed.
Gazprom Energy	Again, this will cause further confusion as customers with smart meter won't need to give readings as they can be remotely taken. Those with legacy meters will have to wait for D0086. It needs to be standardised, not segregated depending on meter type.
Haven Power	Running two processes at the same time means more complication and increases the possibility of error. It also adds significantly to overheads in terms of systems and resource that is needed and would act as a significant barrier for any new market participant. There is also the possibility that it will introduce barriers for switching, as to reduce their costs some suppliers make the decision to only supply sites where SMART is already installed.
Total Gas and Power	
EDF Energy	EDF Energy believes that the impacts of running both processes in parallel would be a small incremental change to existing processing, especially for Suppliers. On gaining an MPAN with a smart meter the New Supplier will need to programme the meter and take a reading from the meter anyway, and would logically send this to their NHHDC on a D0071. Having programmed the meter to their preferred SSC and meter functionality, they would also send the NHHDC the Meter Configuration Details. Sending this data to the NHHDC is in line with the current CoS process as documented by BPDG. The new Supplier will also need to send a D0052; however in the case of an SSC change coincident with CoS this flow would be required anyway. Based on receiving that data the NHHDC would be able to recognise that the meter is smart, and so would be able to turn the reading into a D0086 immediately, which would be a small variation on current NHHDC processing for D0086s. The New Supplier would still receive the D0086 from their NHHDC as per current processing. From the perspective of the Old Suppliers, they will need to communicate with a meter on losing supply of an MPAN anyway to

	remove tariff information from the meter, so they are likely to take a reading at this point anyway. Passing this on to their NHHDC would be expected as part of current processing; however a change would be required to allow the old NHHDC to turn this reading into a D0086 and send it back to the Supplier. The Old Supplier would receive a closing D0086 from their Old NHHDC as they do now. Based on this, we believe that the changes to support a revised CoS reading process for smart meters are incremental to the changes that are required as part of the implementation of smart metering as documented as part of the BPDG. Therefore the cost and complexity of delivering such changes would be easily outweighed by the benefit of being able to obtain more timely opening and closing reads, and enabling the New NHHDC to pass data into settlements more quickly (and before the SF settlement run).
Enterprise Managed Services	N/A
ScottishPower	As with many of the changes proposed in this consultation there is a requirement to operate processes for smart and legacy meters in parallel. There is clearly an overhead for Suppliers in managing multiple processes even when a process is simplified.
Lowri Beck	Running two CoS processes concurrently could have implications between agents especially when chasing MRH and MTD's. Areas which need to be considered include: • On appointment the new NHHDC are unaware if the MPAN has a smart meter at site. • New DC will generate a D0170 to both the old NHHDC and new/current NHHMOA. • Old DC and NHHMOA will be unable to send MRH and MTD's respectively as new process requires CoS read and Meter Details are sent from new Supplier. • Will cause issue with PARMS with regards to lateness of MRH and MTDs sent by old agents. These need to be considered.
Northern Powergrid	This presents a possibility of legacy systems and data not being fully maintained especially if the system required significant investment. In order to ensure a smooth transfer across to a smart metering system this data will be invaluable to maintain customer experience.
RWE Npower	To avoid confusion and minimise impacts and risks the two processes should be kept separate.
Electricity North West	There are cost implications to implement the new process alongside existing legacy processes, as parties will need to amend their systems and business processes to accommodate them.

	Distributors will need to consider DUoS billing for Dumb and Smart Meters and the use of 'de-linking' We will need to overhaul Smart Metering process to compare that of Dumb meters since such information is coming from Suppliers instead of MOA's. Business processes will be required to select the relevant dataflow dependent on dumb or smart when a meter is removed.
Salient Systems	Additional complexity, systems, procedures, anomaly resolutions.
SmartestEnergy	The new technology just allows the remote dial up requirements; the existing process remains unchanged to allow the running of the new process to occur concurrently.
SSE Energy Supply	There will be an additional cost and provided the processes are independently operating, these costs can be managed. Domestic and PC3-4 should be on the new process for ongoing.
British Gas	There would need to be a clear and different process used for legacy metering CoS. It is unlikely that an actual read will be gained on the CoS date and thus DCC will not interact with the old and new supplier. This means the old supplier will still be dependent on the new suppliers agents deriving the CoS reads. This new option for not sending D0152 / D0010 between old and new DC's is unlikely to work on legacy metering.
E.ON	This is inevitable to some extent.
5.4 Are there benefits in a new process being available in time for the mass rollout of smart metering in 2014 or would it be better to consider process revisions as part of Ofgem's smarter energy markets work programme? Would the benefits of early implementation outweigh the additional workload required to implement these changes in addition to the other system changes required for the smart roll-out?	
Ovo Energy	Once again the preference is to make this solution live from the beginning so that customers can see the benefits of receiving immediate data and statements from their first change of supply.
Western Power Distribution	No comments
Siemens Metering Services	If implemented as part of the smart roll-out then each parties changes could be tested as part of the participant proving phase of testing, reducing some of the risk.
TMA Data Management	The phrase "start as you mean to go on" comes to mind, if new processes are required, they should be available as soon as possible.

Gazprom Energy	No, a change of this magnitude needs to be considered as a separate issue. The current CoS procedure will still function adequately for the smart roll out.
Haven Power	We do not believe that early implementation would outweigh the additional workload; especially coming so soon after significant resource has been used to implement system changes required for the Green Deal – and refinement is likely to be needed for a period after the "Go –Live" date. Whilst there is room for improvement in the current processes the introduction of AMR will improve elements of these and the accuracy of available data, we feel that it would be better to get an understanding of how old issues will evolve and new ones develop before implementing large scale changes that may make things worse and introduce over complication and errors in to the settlements process. We feel that tightening up the existing timescales and then introducing phased, properly considered change would be the best way forward.
Total Gas and Power	
EDF Energy	EDF Energy does not believe that the specific issues that this change will address will necessarily be part of the smarter markets work being undertaken by Ofgem, which seems to be focused more on the ability to switch within short timescales than on the availability and accuracy of change of supplier readings. Based on the answer provided to question 5.3 regarding he costs and complexity of implementing a new process for smart meters, we believe that the benefits to be obtained from this change will easily outweigh the costs. We believe any failure to make changes to improve the CoS reading processes will impact the benefits to be gained from smart metering (and therefore the DECC Impact Assessment) and will have the potential to create a negative public perception of smart metering if it does not make the switching process better as a direct consequence of the installation of the smart meter, rather than at some later date.
Enterprise Managed Services	N/A
ScottishPower	We consider that proposed changes to Change of Supply read processing should be considered as part of Ofgem's smarter energy work programme.
Lowri Beck	If such a change was to be implemented Lowri Beck can see benefits both to it being operational at the time of the Smart meter roll or considering a process revision is taken place as part of OFGEMS work programme out. Attempting to get the correct procedure in place in time of the smart meter roll out would be beneficial as all appointments would

	follow the same process from the very start and may not have implications to the roll out. However, rushing a process through so that it is available from the start may result in issues as possibly not all permutations have been accounted for and additional workarounds may have to be put in place for these instances. Therefore on balance, it could be seen as best practice to have the correct and appropriate process in place even if this means it is applied 6-12 months after the smart meter roll out.
Northern Powergrid	Early implementation would mean sufficient testing could be completed prior to smart mass roll-out.
RWE Npower	There would be benefits in the new process being available for mass rollout. Implementation of this change would eliminate some of the problems in foundation about the new supplier being able to support the MCD set up by the old Supplier and the collection of the readings. It therefore supports a more effective and standard interoperability solution for supporting volumes in Mass Deployment.
Electricity North West	It is essential the new dataflows and processes are in place for the mass rollout so there is no requirement for retrospective sending of dataflows for the SMETS ½ compliant sites that have been installed prior to the implementation date of the new dataflows and processes. The Group initially looked at modifying the existing D0149/150 but they already have numerous data items in them that are not used or duplicated that causes as series of issues when validating these dataflows. On creating the new dataflows the Group ensured for Smart they distinguished Asset data from Configuration data, and responsibility of this data in Smart. The benefits of early implementation would be that; Parties will be able to identify easily that a Smart meter has been installed. Parties will know who to contact (Supplier) if data has not been received within the timescales. No dependency on Asset and Configuration dataflows NHHDC can process readings without asset dataflow Provides an enduring solution for Smart meters. Therefore we see these benefits as outweighing the additional workload to be prepared for Smart rollout, as to what it would be to continue using the existing legacy processes and dataflows.
Salient Systems	A consistent CoS process, from perspective of NHHDC and NHHMO, required across Smart and Legacy.

	Further discussion/review is still to be had on the prospect of integrating DCDA services within DCC; those discussions should not be pre-empted by any anticipatory changes now.
SmartestEnergy	See 5.1
SSE Energy Supply	There is a risk that in a short time, these changes will be reviewed following the Ofgem's Smarter energy market programmed. We believe that any benefits gained will be far outweighed by additional work.
British Gas	We would prefer to consider process revisions as part of Ofgem's smarter energy markets work programme. We do not want to waste resources in implementing changes only to have to make subsequent changes.
E.ON	Early roll out would be preferable.