CP1524 'Improving the communication methods in the fault rectification process'

This CP Consultation was issued on 13 January 2020 as part of CPC00801, with responses invited by 7 February 2020.

Consultation Respondents

Respondent	Role(s) Represented
British Gas	Supplier
E.ON	Supplier, Supplier Agent
EDF Energy	Meter Operator Agent
IMServ	MOA, DC
Northern Powergrid	Distributor
npower	Supplier, Supplier Agent
Scottish Power	Supplier, MOA, HHDC
Siemens	HHDC, MOA
SmartestEnergy	Supplier
SMS	MOA, HHDC
SSE	Supplier
Stark	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management	HHDC, HHDA, NHHDC, NHHDA
UKPN	Distributor
WPD	Distributor, MOA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✖	✓	✓	✓
E.ON	✓	✓	✓	✓
EDF Energy	✓	✓	✓	✓
IMServ	✖	✓	✓	✖
Northern Powergrid	✓	-	-	✓
npower	✖	✓	✓	✖
Scottish Power	✖	✓	✓	✖
Siemens	✓	✓	✓	✓
SmartestEnergy	✓	✓	✖	✓
SMS	✓	✓	✓	✓
SSE	✓	✓	✓	✓
Stark	✓	✓	✓	✓
TMA Data Management	✓	✓	✓	✓
UKPN	✖	✓	✓	✖
WPD	✓	✓	✓	✖

Question 1: Do you agree with the CP1524 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	5	0	0

Responses

Respondent	Response	Rationale
British Gas	No	British Gas is of the view that the proposed solution adds additional layers of complexity to resolve an issue that is technically covered by the existing arrangements outlined within the BSC – especially BSCP514. We recommend that further action is taken under the existing Performance Assurance Framework to address the reasons why D0001s are closed in error and/or duplicated and not resolved in a timely manner. Our current view is that the case for a new suite of flows is not convincing to address the concerns detailed in the change proposal. As an illustration, reference is made to the timescales applicable to the management of D0005s and the ambiguity regarding timescales after 10 WDs. Reference is made to the requirement for the MOA to update the Half Hourly Data Collector (or Supplier) of the status of the fault "as appropriate" and on a "regular basis". The consultation document is silent on whether bespoke timescales were considered.
E.ON	Yes	We feel the proposals will improve visibility of respective faults to metering systems through greater visibility within the supplier hub of each fault raised.
EDF Energy	Yes	Increased transparency between all agents
IMServ	No	As MOP we want to operate a single faults process across all markets. CP1524 is offering improvements in our ability to track and communicate with Suppliers & DNO, yet we can't access these benefits if the meter is NHH AMR, SMETS or DUMB. Making the necessary systems changes for CP1524 will be expensive, because the CP restricts its use to the HH market and we will only gain the benefits for a smaller subsection of our MOP portfolio. We also incur overheads associated with operating two distinct processes. The idea that the process could be optionally adopted for AMR is not helpful. We can't see how such agreement could be reached for AMR meters when the new suite of flows go to all DNOs and could go

Respondent	Response	Rationale
		to any MOP/DC on CoA/CoS: Operating different process between HH & NHH is unhelpful, operating different process within the NHH market is even less helpful, the solution shouldn't include any optionality, it needs to be all or nothing. While we recognise the benefits that CP1524 could deliver ,we believe the expense of introducing the new HH solution, and at the same time maintaining the existing NHH process means the cost outweighs the benefits. As a DC, we are unsure that the benefits that this and the two other CPs bring justify the costs. One major issue with this CP is that it doesn't include the NHH market and it isn't future proof, looking ahead to MHHS. This significantly erodes the value of these CPs. We completely disagree that, in many cases, fault rectification flows for Non Half Hourly Metering System Identifiers are used as job booking flows to confirm Site visit details with the MOA rather than a request to investigate. This is not a justification for exclusion of NHH, if a fault notification or fault resolution flow is being used for a purpose other than that it was intended for, this does not justify excluding this segment of the market from realising the benefits of this CP. In our view it completely undermines the 3 CPs value. In both NHH and HH the issue is the same – there is a meter on a wall which has become faulty in some way and the DC and MO need to liaise and take action to rectify. However even if the solution does include NHH, we are still unsure that the benefits outweigh the costs. We are unsure if the number of faults outstanding will diminish as a result. We have estimated our own internal costs to be in the order of £100k to £120k to support the 3 Change proposals Fault Category – what is meant by the statement 'This categorisation will be based on the type of Metering Equipment that is faulty…'? We are also unconvinced of the need for 3 new flows which effectively replace 3 existing flows, i.e. D0001 is replaced by DAXYX, D0002 is replaced by DAXYY and D0005 is replaced by DAXYZ, rather than adding new fields in to the existing flows. Please can the rationale be

Respondent	Response	Rationale
		explained? Is this solely because NHH is excluded and therefore need to retain the existing flows? We are also unconvinced that the 3 CPs can be implemented independently of each other, there is some inter-dependency.
Northern Powergrid	Yes	No comments
Npower	No	Whilst we agree with the rationale for the change, we find that in most cases the MOA do endeavour to resolve the faults to ensure that there Settlement performance is above the rated % in performance reports. However, there may be some MOAs who carry out the 15WD as another method to just prolong the fault as they are unable to rectify it at the time, often the issue is around site access. These are primarily the ones that are over the 15WD timescale and are either down to the customer refusing access (normally hard to gain access sites) or the MOA's communication method is unfortunately not suitable for the customer and to which they would indeed go onto permanent hand held and remain this way until future technologies are capable of retrieving the data (satellite comms, Ip comms and new data sims etc..) Our internal MOP systems are able to differentiate between specific faults alongside the length and history of each individual fault and flow raised; any records within an audit and through the fault process are readily available and costings have been factored in by the business to ensure that this works to the best of its ability. Therefore creation of these three new data flows and processes would indeed cost a substantial amount and be of little benefit. Strengthening the existing 15wd process and related legal text may be an option that we support. We believe that further workgroup discussion to develop alternative options may be beneficial to the outcome.
Scottish Power	No	We see no need for a new suite of data flows and change to the existing process. However, we agree with the changes to the process how faults should be passed to the incoming part on a Change of Agent or Change of Supplier.
Siemens	Yes	We believe that proposed solution will improve Fault rectification process when compared with current situation. The introduction of communication data flow

Respondent	Response	Rationale
		will improve visibility of which party or agent the fault current resides with.
SmartestEnergy	Yes	Ensuring that identified faults are resolved efficiently and in a timely manner is essential to making sure that only accurate metered data is used in the Settlement calculations. This change will improve interoperability and communications between Parties and Party Agents by removing the duplication of D0001 flows being sent to raise a fault that has been incorrectly closed, and creating bespoke flows for interparty communications in the fault resolution process. Current BSC timescales and Service Level Agreements focus on the sending of data flows rather than the complete rectification of the fault. We do not consider the example of a Meter being temporarily changed to 'hand held read', rather than an enduring remote solution, to be a valid rectification. The current process with D0002s is too open to interpretation and a new flow is definitely needed for this process.
SMS	Yes	We agree with the proposed solution and think that it will improve performance and fill the gaps in the current solution.
SSE	Yes	No comments
Stark	Yes	No comments
TMA	Yes	No comments
UKPN	No	Whilst we do not disagree with the principle of the proposed solution it is an overlap/duplicate of the process that already exists within Section 30.5 of the Distribution Connection and Use of System Code (DCUSA) "Dangerous Incidents and Damage". We don't believe that this CPC has considered the existence of this process nor the D0135 Data Flow that communicates information on faults from supplier to LDSOs. There is no logic for having a general process for LDSO equipment plus a specific process for LDSO 'metering' equipment. This will cause confusion and duplication of reporting and activities. We believe this CPC and its solution must be reviewed in light of wider industry processes already in existence.
WPD	Yes	We agree with the CP1524 proposed solution. However, without sight of the proposed new data flows, it is difficult to fully assess whether there are any issues with the proposed process steps.

Question 2: Do you agree with the proposed solution for how faults should be passed to the incoming part on a Change of Agent or Change of Supplier?

Summary

Yes	No	Neutral/No Comment	Other

Responses

Respondent	Response	Rationale
British Gas	No	No comments
E.ON	Yes	We agree with the proposed processes to transfer faults on COA/COS events, this will provide incumbent agents/suppliers with early visibility that faults are open which enables a more efficient resolution of open meter faults.
EDF Energy	Yes	Please see comments further on; agree with proposed solution but a couple of issues in redlining.
IMServ	Yes	As a MOA we believe receiving notification (flows) of existing faults on change of MOP/CoS, is a significant improvement on the current process, such a change should assist with existing MOP adoption/interoperability issues. Clarity of how the process works will be required, for example: Are DAXYX, DAXYY flows transferred on CoA 'for info' only, should the new MOP wait for a new DAXYX flow from Supplier/DC containing a new unique reference number before taking any action. We presume that there is no requirement for the MOP to take action based on a DAXYX, DAXYY flows sent on CoA? As a DC, we are mildly supportive of this idea but we have a few concerns. If we were appointed to a site as HHDC where a fault was open, it has some value to know this, but we would take our own view as to whether a fault exists. Some specific questions on this: Is the intention that where a fault exists that on change of HHDC, that the new HHDC does not issue a new DAXYX where they have received a DAXYX and DAXYZ from the current MOP? This could mean that when

Respondent	Response	Rationale
		HHDCs are audited, part of the audit may rely on another HHDC's activities. Are we correct in thinking that the unique fault reference number is effectively 'carried forward' by the new HHDC in any flows relating to the open fault? What is intended to happen should the HHDC not encounter the same error? This would also have implications on performance reporting. Also, are the timescales sufficiently short that the new HHDC is aware of the existing fault in time to prevent them from raising a new fault? Having a deadline on the MOA of 'Within 5 WD of notification of new HHDC' may not be soon enough to prevent the new HHDC detecting an issue and raising a new fault. Why 5 WD, this seems a long time just to copy a flow out to a new HHDC? Dealing with an open fault and being notified of this by the MOA is likely to add a significant development cost.
Northern Powergrid	Yes	No comments
npower	No	The introduction of a Unique Fault Reference, will improve the end to end tracking of faults however we believe that the addition of a new data flow and identifier is already available in the MOP suite of systems the additional flows would not serve the purpose it is intended to for the MOA. As it stands, we do not see a benefit for npower in having these new flows but could see how it may benefit those who do not use Wheatleys MOP and have a smaller portfolio. Has it been assessed to see if this could be added into the already existing D0001 flow to avoid a creation of a new flow? Shouldn't the DC already be describing what fault has occurred (phase failure flags, Communication failure, consumption on a De-energised site for example) as it should already be prevalent in the original D0001; if required could a new J item be created for the D0001 to track this for HH only (although NHH would also benefit from this being in the D0001 albeit for reporting purposes only). As an Agent we agree that the responsibilities should fall on the parties who are required to resolve the failure. We can see the benefit somewhat in having this

Respondent	Response	Rationale
		information passed over but a notification in the form of a D0005 would suffice to the new MOA, DC, Supplier upon a COA/COS rather than a creation of a new flow to send to notify. The D0005 is already used as a notification to parties so we are not clear as to why it cannot remain. We feel that the creation of further flows for a single process could cause more confusion. In summary, we agree with the implementation date however currently as it stands we do not agree with the proposal in its current form as we believe that the existing process in place does not hamper the effective resolution of faults on Metering Equipment. Alongside, with the introduction of D0268 changes and the previous commissioning flows update, we feel as though there is sufficient updates to the HH metering aspect and that these records would aid fault resolution even further. Creation of these new flows could indeed lead to further confusion and we therefore feel that adding new data items into the existing flows would prove more beneficial and cost effective.
Scottish Power	Yes	We agree with this part of the proposal.
Siemens	Yes, with caveats	We agreed with the proposed solution for CoS/CoA; however from our review of the draft communications data flows definitions we believe that there is a mismatch with the requirements of BSCP514 5.2.4.8. The draft definitions of the DAXYX and DAXYZ data flows don't show a MOA to MOA version. We agreed with the draft BSCP514 that MOA to MOA versions of these are required, so that the loosing MOA can inform the gaining MOA of the open fault. Additional comment about the data flows in response to Question 9.
SmartestEnergy	Yes mostly	We believe that if an outgoing MOA can pass details of open faults to an incoming MOA on a concurrent change of Supplier and agent, then they might as well do it where there is just a change of MOA, with the flows being copied to the Supplier.
SMS	Yes	We agree that the process will keep HHDC & MOP better updated in the fault process.
SSE	Yes	No comments
Stark	Yes	As HHDC we understand that we will rely on the supplier or MOA to notify any opened faults during the change of MOA, HHDC or CoS.
TMA	Yes	No comments

Respondent	Response	Rationale
UKPN	No	See above as to the need to revise this CPC and its solution in light of wider industry processes already in existence.
WPD	Yes	The proposal that on a concurrent CoS and HHMOA the current MOA sends the new MOA the D[AXYX] Data flow and D[AXYZ] appears to ensure that continuity is maintained in the fault rectification process. However, it would be helpful to clarify whether, when a new MOA receives the D[AXYX] data flow notifying the there is a current fault with the metering equipment, that the "clock" resets for the new MOA?

Question 3: Do you agree that the draft redlining delivers the CP41524 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	4	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
British Gas	Yes	British Gas agrees that the draft redlining delivers the CP1524 proposed solution. However, we do not support the solution proposed in its current format.
E.ON	Yes	No comments
EDF Energy	No	Please see comments further on as requested; couple of issues in redlining.
IMServ	No	As a MOA: BSCP514 section 5.2.1.7.A says that the supplier has 10 WD (days after sending the D0170) to transmit details of any open faults. This is too long, if there is an open fault the new MOP will benefit from knowing the details immediately. Ideally we would like the DAXYX, DAXYY flows to be transferred to the new MOP at the same time or very soon after the D0170 is sent, if there is a 2 week delay then the benefit may be lost. We have the same view of the timescales when its Change of DC, the MOP should trigger the DAXYX, DAXYY flows at the same time they send the MTDs, they shouldn't need 5 days to pass on the DAXYX, DAXYY to the DC. As a DC: BSCP502: Section 3.2.4.4. Where the new HHDC is notified of an existing fault but does not encounter the fault, should there be a step where the new HHDC notifies the MOA & Supplier that the fault can be closed? Or will the MOA assume this if they don't receive a report of a fault from the new HHDC? Why does section 3.4.2 still refer to D0001/D0002

Respondent	Response	Rationale
		In 3.4.3.2, the MOA is noting the Fault Category for use in 'fault report', what fault report? What is the intended process behind 3.4.3.3 Confirm Fault Category, is the MOA simply repeating the same information they received in the DAXYX or are they informing the HHDC / Supplier of their own view, in which case noting the initial category as quoted by the HHDC / Supplier helps the MOA take the initial investigation but other than that it doesn't need to be 'noted', this is an internal process surely. Section 3.4.3.4 What happens if the Supplier / HHDC fail to 'Respond to request for support or further information.'? Does this make the MOA still liable for the fault in terms of fault reporting, we assume it would as written. Also, there seems to be no timescale for this activity. 3.4.3.3. A What happens if a Supplier and MO cannot agree an expected action date? 3.4.3.6 Other than the Supplier disagreeing an expected action date, what will prevent MOAs setting vexatious dates far into the future so as to avoid having to issue further DAXYZ flows with a new date in it?
Northern Powergrid	Yes	No comments
npower	No	The Annex redlining as it appears, removes the D0001, D0002 and D0005 from the HH side and creates 3 news flows which is costly and resolves nothing aside from moving one suite of flows into another. The problem can still remain on these sites provided we have no access and the customer is unwilling to assist. In that case escalation to supplier as part of the supplier HUB principle should be followed and in worst cases then the MOA should endeavour to escalate accordingly. All of this is already an existing process. The supplier should be managing their agents correctly and if an agent is struggling to resolve a failure then the supplier should be readily available to assist.
Scottish Power	Yes	Yes, we agree that the draft redlining delivers the CP1524 proposed solution.
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	No response

Respondent	Response	Rationale
SSE	Yes	No comments
Stark	Yes	Unique Fault Reference would help tracking the fault types sent/receive from/to the MOPs. BSCP502 3.2.4 and 3.2.7 help notifying HHDC for any open faults carried forward from the previous agents. BSCP502 3.4.3 helps HHDC to request further information from the MOA when the "Expected Action Date provided by HHMOA" is challenged. Also 3.4.3.6 where MOA requires to issue DAXYZ to both supplier and HHDC when fault remains unresolved increase the visibility of fault progress for supplier (where existing D0005 doesn't).
TMA	Yes	No comments
UKPN	Yes	Our reading of the text suggests that the changes would deliver the intended effect – but we don't agree with that effect.
WPD	No	Whilst the red-lining on the whole delivers the proposed solution, there are some issues with the red-lining on the BSCPs which are detailed later.

Question 4: Do you believe that the implementation of CP1524 will lead to any unintentional operational challenges or risks arising?

Summary

Yes	No	Neutral/No Comment	Other
11	4	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Introducing new flows - and in conjunction with the proposals outlined in CP1525 and CP1526 - have the potential to mean that faults that are materially impacting settlement have a greater risk of being resolved later than currently evidenced. This impacts the integrity of settlement and the customer experience.
E.ON	Yes	The solution implementation lends itself to a 2-tiered fault resolution process on Implementation, as existing open faults pre-implementation will be going through resolution through the existing D0001/D0002 processes. We would recommend that guidance is provided to industry that defines how open meter faults should be treated over the implementation window supported by specific education days to support over the cut over to the new fault process.
EDF Energy	Yes	There is potential for a DAXYX flow to be raised on exactly the same day by both Supplier and DC to MOA following either the fault inv. process or a COA/COS. In the event that this happens, 2 faults would be open; which one should MOA close if they are for the same fault? How is the risk of this occurrence to be reduced?
IMServ	Yes	As a MOA, we believe it's a significant and complex re-work to the existing outdated process, we are fairly sure that there will be unexpected operational challenges and/or risks and have highlighted some of these in other sections, e.g. challenge of operating this electively in the NHH market. As a DC we have already noted those we have identified in the response to other questions.
Northern Powergrid	Yes	Not CP1524 specifically but the whole range of the changes will. See Question 6 of CP1525

Respondent	Response	Rationale
npower	Yes	We do not believe the solution being proposed addresses the issues effectively, and if anything, may lead to more confusion.
Scottish Power	Yes	HHDC will raise a fault when unable to communicate with a meter, but we believe that the HHDC will not have the required skill set or knowledge to correctly categorise the fault. Engineer skill sets are specialised based on metering system and there is a risk that the correct engineer may not attend site based on the information provided.
Siemens	Yes	We have identified a potential operational challenge if pre-CP1524 Faults are allowed to remain open and have to dealt with post-CP1524 we will have develop a more extensive solution (or solutions) that has to handle both processes. It is not clear to us if this dual process scenario will be allowed post-CP1524. We believe that if it was allowed it would lead to potential confusion in progressing fault resolution. We are therefore intending a 'clean slate' approach to resolve this potential issue. This will involve on the afternoon prior to industry implementation our HHMOA role sending closing D0002 flows to the relevant parties (Suppliers, HHDCs) for the open Faults that it has in its database. Likewise our HHDC will close any open D0001s in its system on the same day. We know from experience that not all Faults which are resolved do not get closed in the HHDC system because if the difficulties of matching D0002 to D0001, especially if multiple D0001s have be raised for the same MSID, giving a false impression of fault resolution performance. Therefore closing existing faults will give a clean slate to work from. If the fault still exists at Industry Implementation we expect the HHDC to raise it as a new Fault using the DAXXX data flow. We would like to know as soon as possible if this approach would be problematical to any other party. If we receive any Fault D0001, D0002, D0005 after Industry Implementation Date we will not process them but will liaise with the sending party to come to a satisfactory resolution.
SmartestEnergy	No	No Comments
SMS	Yes	We can see situations where there is no direct commercial agreement between MOP and Supplier (Agreement between customer and mop) so there could

Respondent	Response	Rationale
		be challenges getting access to hard to read sites. This situation could create a loop in the BSC514 5.4.1.5.
SSE	Yes	Not necessarily major operational challenges or risks, however it should be noted that as the number of Half Hourly sites increases (in particular, from implementation of market-wide half hourly settlement), suppliers and agents will need to ensure their systems and processes are ready to cope with the new flows and processes.
Stark	No	The recommended implementation date is 24/6/2021. The timeline for process review and planning in the Operational Team should be sufficient.
TMA	No	No comments
UKPN	Yes	As noted above the proposed solution it is an overlap/duplicate of the process that already exists within Section 30.5 of the Distribution Connection and Use of System Code (DCUSA) "Dangerous Incidents and Damage". This will cause confusion and duplication of reporting and activities. We believe this CPC and its solution must be reviewed in light of wider industry processes already in existence.
WPD	No	Do not believe that the implementation of CP1524 will lead to any unintentional operational challenges or risks arising that have not already been fully considered by the Working Group for Issue 73.

Question 5: Will CP1524 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
14	0	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	As Supplier, activities impacted include, and are not limited to the following: Change of Supplier Gain/Loss; Half Hourly Fault Management; Agent Management.
E.ON	Yes	The proposed changes under CP 1524-26, along with the DTC changes will require changes to our HH agent and supplier systems in order to move to the revised fault resolution process. Whilst we perceive the proposed changes to be beneficial and significantly improve the fault resolution process, we anticipate the proposed changes will be in the region of a project sized suite of changes across our HH Meter operations, HH Data Collector & supplier systems and processes.
EDF Energy	Yes	-System changes required to accept and process the 3x new flows, and to ensure they can be received and sent to all potential required agents. -Training of users to correctly process the new flows -Review and potentially amend our grey IT.
IMServ	Yes	As a MOA, IMServ use the Wheatley MOP database which caters for both NHH & HH, and as the proposal suggest two separate process for HH & NHH we will need to make some significant changes, for example: HH sites: The existing D0001/D0002 process will need to be retained so we can deal with the existing faults on cut-over (unless existing faults get migrated to the new flows?) The new faults flows will need to be introduced for HH sites post go-live NHH sites: The existing D0001/D0002 process will need to be retained so we can deal with the faults – BAU2). The Wheatley SMUG group will need to decide if they

Respondent	Response	Rationale
		wish to develop the new process for NHH AMR metering. Because the proposal is optional for NHH. Considering the cost/time required to develop and test an optional NHH solution this may not get a green light. ** The above would be further complicated if HHDCs were to send DAXYX flows to NHH MOPs for SMETS meters. As a DC that operates both in the HH and NHHDC roles, having to support two similar but different fault correction activities will have a significant impact on: Systems Work Instructions Training
Northern Powergrid	No comment	No comments
npower	Yes	A full impact assessment has not been conducted but as this change is referencing the removal and creation of flows, there will be significant system and operational changes.
Scottish Power	Yes	This change would result in significant and unnecessary changes to both processes and systems. In addition there would be significant changes to align internal documentation, as well as time developing and delivery training requirements.
Siemens	Yes	The development and implementation of system amendments to exchange the new communication data flows between MOA and other parties. The development of back office procedures and documentation to support the effective use of these new data flows.
SmartestEnergy	Yes	We should see an improvement in transparency and the quality of data as a result of this modification.
SMS	Yes	*CONFIDENTIAL RESPONSE*
SSE	Yes	Additional processes will be required to manage the new incoming flows and ensure the outgoing flows can be assigned unique reference numbers. This will likely require automation of these processes as numbers of HH supplies increase.
Stark	Yes	Impact will be relevant code change in the HH system to facilitate new data flows sending and receiving. Also, the whole fault investigation process in the HH system.

Respondent	Response	Rationale
		Training in place for the new fault investigation process for the HH Team and relevant operations team.
TMA	Yes	Our systems and processes would be impacted.
UKPN	Yes	The prosed solution would require changes to systems and process with the consequential training out to staff. We would also need to put in place mechanisms to de-duplicate faults raised through this new process and those through the existing process and ensure that communication back to other parties were fed through the correct channels.
WPD	Yes	The introduction of the new data flows will involve system changes along with additional process and monitoring procedures.

Question 6: Will your organisation incur any costs in implementing CP1524?

Summary

Yes	No	Neutral/No Comment	Other
13	1	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	British Gas is of the view, based on the evidence to date, that costs will be incurred to ensure: We have the functionality to send/receive the proposed new flows; Internal business readiness activities are planned and implemented to inform impacted resource of the changes to the communication methods in the fault rectification process; Appointed/impacted agents are engaged; Management reporting developed to track fault performance based on new metrics. It is envisaged that the costs listed would be a one off, however the reporting suite would be subject to review.
E.ON	Yes	*CONFIDENTIAL RESPONSE*
EDF Energy	Yes	An estimated £80k one-off costs for the system changes, plus £8k pa ongoing, with a caveat of +/-25%. This is a grand total inclusive of all CP1524, CP1525, and CP1526.
IMServ	Yes	As a MOA, yes, from several sources, primarily software development, testing & training – see response to Question 5 for further detail. Ass a DC, most of the costs associated with this CP will be one off development costs. Our initial view is this will be in the region of many £10s of thousands to £100k There will be some ongoing costs in order to handle CoMC since it is proposed to handle HH and NHH differently.
Northern Powergrid	No comment	No comments

Respondent	Response	Rationale
npower	Yes	We are likely to have to make significant system changes which will incur a cost. A detailed cost assessment has not yet taken place.
Scottish Power	Yes	The significant changes to systems and process will incur costs. These costs will only be determined by a full IT impact assessment but would be estimated to be a medium or high change. There will also be costs in support of training development and delivery.
Siemens	Yes	One-off cost of development and implementation of system amendments and the supporting local working practice documentation. Ongoing cost of staff monitoring and responding to the communication dataflows.
SmartestEnergy	No	No comments
SMS	Yes	We will incur one costs to make system changes for the proposal. We will also incur resource costs for implementation, updating processes and relevant training.
SSE	Yes	There may be one-off costs associated with implementing additional processes and automation as described above in our answer to Q5.
Stark	Yes	Resources costs involved with planning, testing and implementing the required code changes for Question 5.
TMA	Yes	Medium costs
UKPN	Yes	*CONFIDENTIAL RESPONSE*
WPD	Yes	The introduction of the new data flows will involve system changes along with additional process and monitoring procedures. This will have a costs implication to our organisation.

Question 7: Do you agree with the proposed implementation approach for CP1524?

Summary

Yes	No	Neutral/No Comment	Other
10	5	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	British Gas is of the view that the proposed implementation approach is reasonable. However, do not support the solution proposed in its current state.
E.ON	Yes	In our opinion this CP is provisions a necessary large-scale change to the end to end Fault resolution process, so we feel that at least 12 months lead time post approval to implementation is needed to allow parties an appropriate lead time to facilitate the changes, Implementation via a big bang approach is the suitable option.
EDF Energy	Yes	No Issues
IMServ	No	As a MOA, no, for the reason stated in question 1. Also, we believe the cut-over from D0001 to DAXYX would need to be detailed in the implementation approach. If data migration from D0001 to DAXYX is required the instructions needs to be clear and preferably made mandatory/managed/audited. As a DC, it seems to us that there is a dependency between CP1524/5/6 where CP1526 has a dependency on CP1524/5 and CP1525 has a dependency on CP1524 so it is not true to say each can be evaluated and implemented separately. We are unclear on what would happen with open faults at the point of cut-over
Northern Powergrid	Yes	No comments
npower	No	As highlighted in our response to Q1 and Q2.
Scottish Power	No	We propose that the implementation approach takes into consideration and aligns with next year's Faster Switching implementation range with a November 2021 implementation.

Respondent	Response	Rationale
Siemens	Yes	We are happy with the proposed June 2021 industry implementation on the assumption that the required data flows will have been agreed and approved by the MRA MDB six months before go-live and definitive versions of the data flows and J items are available in the DTC (future release) by this date. The reason for the six month lead time is based on our experience of implementing the new commissioning dataflows (D0382, D0383, D0384) - CP1496 & CP1497, where the definitive definitions of the flows were not available from the MRA until a couple of months before go-live, this significantly impacted our ability to progress with system development in a reasonable timeframe. Therefore, we want to avoid a repeat of the situation of development being delayed because of the lack of this information.
SmartestEnergy	Yes	No comments
SMS	Yes	We agree but think the implementation timescales are short.
SSE	Yes	We agree with proposed implementation in June 2021, to allow the associated Data transfer Catalogue CP and new data flows to be fully developed and implemented, and to align with implementation of CP1525 and CP1526.
Stark	Yes	No comments
TMA	Yes	No comments
UKPN	No	See above
WPD	No	We do not agree with the proposed implementation approach for CP1524. Without sight of the associated DTC data flows that will accompany these BSC changes we are unable to determine whether the implementation approach is achievable.

Question 8: Do you agree the proposed process changes will be more effective at ensuring timely rectification of faults than adding new data items to the existing flows and processes?

Summary

Yes	No	Neutral/No Comment	Other
10	5	0	0

Responses

Respondent	Response	Rationale
British Gas	No	Please refer to response to question 1.
E.ON	Yes	We feel the revised fault resolution process is more effective than the current process and provides clarity to all parties involved in the fault on the position, ownership of a fault is also more improved under the new solution.
EDF Energy	Yes	No issues
IMServ	No	As a MOA, Theoretically it should improve the rectification process however in practice this is may not be so. Suppliers are under pressured to offer Smart meters and complete AMR installation plans/follow up work and thus MOAs are also being pressured to complete this work. This ends up being prioritised over faults. As a DC, neither approach is likely to have a significant impact to improve fault rectification.
Northern Powergrid	Yes	No comments
npower	No	As highlighted in our response to Q1 and Q2.
Scottish Power	No	We believe that the proposed changes may cause more errors due to the unintentional operational challenges and risks explained earlier.
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	We think that the improved communications will speed up the resolution of faults as the information provided with faults can help pinpoint the cause of faults. We also think that all parties can see what's needed to resolve the faults and will encourage involvement.

Respondent	Response	Rationale
SSE	Yes	The introduction of the new flows will be more efficient to audit than changes to existing flows and will encourage timely rectification of faults by agents.
Stark	Yes	The proposed solution should improve the efficiency and effectiveness of the fault rectification process with fault category and obligation on notifying open faults. Also improving communications between agents by avoiding duplicated D0001s where fault has been closed incorrectly.
TMA	Yes	No comments
UKPN	No	The existing DCUSA process should be developed if it is deficient in meeting this need.
WPD	Yes	Amending existing flows carries more risk than introducing new data flows. We believe that this has been fully assessed within the Working Group.

Question 9: Do you have any further comments on CP1524?

Summary

Yes	No
6	11

Responses

Respondent	Comments
E.ON	The proposed changes also offer a certain level of future proofing by limiting the proposed solution to the current HH market segment and providing the option for NHH advanced meter faults to use this process, which should mean that these processes will be cleaner to transition to the future Target Operating Model currently being developed under the Market Wide HH Settlement Reform Significant Code Review. As this CP is a large change to the fault resolution process, E.ON would also recommend that ELEXON offer training days to industry parties to ensure that industry is engaged, and all have an appropriate level understanding. Based on the current implementation dates we would suggest this should be considered over Q1/Q2 2021.
IMServ	As a MOA, the document states that some NHH parties use the current D0001 to communicate that an appointment has been booked (J0174 - Appointment Date) and that this is one reason why we need to continue using the D0001 for NHH. Could this obstacle be overcome by adding J0174 to the new DAXYX flow? When SMETS meters are moved from NHHDC to HHDC it's our understanding that the MPANs will remain in NHH MOP. We appreciate that the faults process for SMETS meters is unclear, however it's not difficult to imagine that in the future HHDCs will want/need to send SMETS faults to NHH MOPs. It's not at all clear if the HHDC will send the DAXYX or the D0001. If it's the DAXYX then there will be issues as NHH MOPs are not required to accept this format, if it's the D0001 then there will be issues as this functionality will be switched off in HHDC systems. In this respect we don't think the solution is sufficiently future-proofed. For us it is not clear why the new flows could not be used across both NHH & HH markets, we are not aware of any technical issues which couldn't be overcome, we expect must be other reasons which are not being explained sufficiently, what are those reasons?
npower	As the FIRG produced a list of recommendations for improvements to the faults process in 2015, do these need to be reviewed prior to changes being drafted to see if the solutions suggested are still relevant in today's market? We would suggest further workgroups to identify and shape alternative options.
Siemens	1. a) The Requested Action Date (Jeeee) item on the DAXYX flow should be optional as per the DAXYZ flow not mandatory. This because the DAXYZ flow can be raised by a HHDC as well as the

Respondent	Comments
	Supplier, the HHDC should not be requesting an action date. The definition of the Jeeee item is 'The date at which the Supplier requests the MOA to take action in regards to the rectification of a fault.' Appendix C of the DTC could into a rule for the DAXYZ flow mandating that if the flow is from a Supplier then a value for Jeeee is required, but if the flow is from other parties then the J item should left null. b) As per our response to Question 2 we believe there is a requirement for a MOA to MOA DAXYX & DAXYZ flows. This is by the inclusion of the requirement in the draft BSCP514 at 5.2.4.8.A, but not included in the draft DAXYX and DAXYZ definitions. 2. Please see our respond to Question 7 regarding the requirement to have the new data flow definitions approved by the MRA six months before the Implementation date. 3. We would welcome feedback from other parties regarding the approach that we intend to take regarding go-live at Implantation as outlined in the response to Question 4.
Stark	What's the expectation for the historical D0001, D0002 and D0005 flows handling after the implementation date? What's the expectation if expected new data flows haven't been received due to appointment error or retrospective appointment (e.g delay in CoA; CoS notice)?
WPD	We would have preferred to have reviewed this change alongside the proposed new DTC data flows to achieve a complete understanding of the whole process.

BSCP502

Respondent	Location	Comment
WPD	3.4.3.3.A	This new section requires that if the Expected Action Date provided by the HHMOA is challenged within 2WD Supplier is to send MOA a D[AXYZ]. The section also includes an action if the Expected Action Date is accepted. It is unclear if the D[AXYZ] is also to be sent by the Supplier on acceptance of the HHMOA Expected Action Date.
	3.4.3.2	Action is "Go to 3.4.3.10". This should read "Go to 3.4.3.7"

BSCP514

Respondent	Location	Comment
EDF Energy	5.2.1 5.2.1.4 5.2.1.7.A	Appears a reference is missing to tell current MOA to issue a flow (the most recent as per footnote 11) to the Supplier after ref 5.2.1.4 (if not rejected) and before 5.2.1.7.A otherwise there is no guarantee that the latest DAXYZ flow to supplier was the most recent actual update on the fault that MOA had available. Also which flow would be relevant from current MOA to Supplier, or would both be relevant; DAXYX / DAXYZ?
	5.2.3 & 5.2.4 5.2.3.2 5.2.4.8.A 5.2.4.10.A	Ref 5.2.3.2 states for MOA to send to new DC, and ref 5.2.4.8.A states for current MOA to send new MOA the equivalent D1 and D5 flows (DAXYX and DAXYZ), but why is the DAXYX (eq. D1) required? The DAXYZ flow is used to update the fault from current MOA and this should contain all the data required to inform new DC/new MOA of the fault and current status. Sending a DAXYX from current MOA is unnecessary extra work. Also ref 5.2.4.10.A; if the above flow changes this would also need amendment in the same way.
	5.4.1.3.A	Ref 5.4.1.3.A; we challenge the relevance of a D0010 going to DC or Supplier from MOA; if SV resolved the fault the agents can now dial and gain their own reads for billing, if SV didn't resolve the fault the reads are potentially inaccurate or not possible to gain. Agents don't actually use MOA reads to bill on so this would again be unnecessary extra work.
	5.4.1.5A	Ref 5.4.1.5A should be ref 5.4.1.5.A.
WPD	5.4.1.5.A	This new section requires that if the Expected Action Date provided by the HHMOA is challenged within 2WD Supplier is to send MOA a D[AXYZ]. The section also includes an action if the Expected Action Date is accepted. It is unclear if the

Respondent	Location	Comment
		D[AXYZ] is also to be sent by the Supplier on acceptance of the HHMOA Expected Action Date.
	5.4.1.8	Typo – "timesclaes" should be "timescales"

BSCP537 Appendix 1

No comments received.

BSCP537 Appendix 2

No comments received.