CP1525 'Improving the involvement of the LDSO in the fault resolution 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	MOA
ESP	Distributor
IMServ	MOA, DC
Northern Powergrid	Distributor
npower	Supplier, Supplier Agent
Scottish Power	Supplier, MOA, HHDC
Siemens	MOA, HHDC
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	✓	✓	✓	✓
ESP	✓	✓	✖	✓
IMServ	✖	✓	✓	✖
Northern Powergrid	✓	✓	✖	✓
npower	✖	✓	✓	✖
Scottish Power	✖	✓	✓	✖
Siemens	✓	✓	✓	✓
SmartestEnergy	✓	✓	✖	✓
SMS	✓	✓	✓	✓
SSE	✓	✓	✓	✓
Stark	✓	✓	✓	✓
TMA Data Management	✓	✓	✓	✓
UKPN	✖	✓	✓	✖
WPD	✓	✓	✓	✖

Question 1: Do you agree with the CP1525 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	5	0	0

Responses

Respondent	Response	Rationale
British Gas	No	BSCP514 places obligations on the appointed to meter operator to address faults and it is currently within their remit to facilitate, with engagement from Supplier, Customer and LDSO, to rectify the issue. The proposal to raise a new flow from MOA to Supplier to compliment the new process appears to add an additional level of complexity to the existing processes that is not required. Guidance on D0005/D0002 usage has the potential to standardise communications when this concern arises and we would suggest that further analysis is conducted to confirm whether this is a more cost effective, viable solution. We note the SVG's initial views and concur that there is potential for cross code conflicts with the Meter Operation Code of practice (MOCOPA). Especially with regards to the MOCOPA having a requirement for MOAs to inform the LDSOs of faults. We recognise that this may be addressed after the consultation submission date and would welcome ELEXON's feedback after the 13th February. Whilst we recognise there is a requirement to clarify LDSO responsibilities to rectify faults, we are of the view that the proposal requires cross code agreement to standardise the process and await further clarity before our decision will be reviewed.
E.ON	Yes	We agree with the proposed solution, as this introduces a formal process for fault resolution on LDSO equipment. In E.ON's experience the resolution of metering faults on LDSO equipment to date has not followed a prescribed process under any BSCP, this has led to differing approaches to resolve across our supplier hub particularly when engaging LDSO's to rectify faulty equipment under their ownership. In Some cases, MOAs have used the safety resolution process to report faulty equipment which has led to costs being incurred for

Respondent	Response	Rationale
		using the incorrect process to report faults, in other's faults have been closed as MOAs have not been able rectify faults on equipment outside of their responsibilities. On this basis we welcome a formal procedure that clearly defines who reports LDSO faults on metering systems which will removes burdens on parties by ensuring the responsible person(s) are receiving and actively working towards rectifying faults on the respective part of a metering system.
EDF Energy	Yes	Increased transparency between all agents and better ownership where LDSO issue is identified.
ESP	Yes	This CP introduces new data flows that will promote efficiency in communication between Parties during fault resolutions.
IMServ	No	As a MOA, we understand CP1525 is linked to CP1524, we believe that CP1524 should be both HH & NHH and therefore we would also like to see CP1525 introduced for NHH metering systems. Currently across the industry there are tens of thousands of CT operated meters in the NHH market, in our own portfolio the numbers are significant. The DNO hardware at these NHH sites is the same as CT operated hardware at HH sites. If we are going to introduce this new process, which is significant improvement on the current process, then we feel its benefits should extend to NHH metering equipment. As a DC, We agree with this CP in terms of placing more accountability on DNOs within the fault resolution process. We do not believe however that it can be implemented independently of CP1524 since section of BSCP502 3.4.3.A.1 (among others) refers to DAXYZ and we do not believe that CP1524 is merit worthy. We disagree that it is limited to HH market only.
Northern Powergrid	Yes	No comments
npower	No	We agree that the LDSO should absolutely take responsibility and be given BSC obligations for assisting/facilitating in fault rectification but feel a new creation of new flows is costly and could lead to confusion. Therefore, we do not support the proposed

Respondent	Response	Rationale
		solution; we would like to understand if there is not a simpler way to 'fix' the issue. Utilising existing flows, perhaps with new role codes may be a better option. For example, possible solutions could include for scenarios where DNO action is required: The MOA close the fault advising the DC and Suppler that they are unable to carry out work, the Supplier / DC and then send a D0001 to the responsible DNO to assist in rectification? Once the DNO complete the work then it would be up to the DC to advise next steps. If MOCOPA states the MOA must notify the LDSO then pass the ownership to the MOP to raise a D0001 against the LDSO in question and await a D0005, D0002 notifying of progress that way the flows are traceable for audits and we will not have further flows diluting the already existing process. We believe that further workgroup discussion to develop alternative options may be beneficial to the outcome.
Scottish Power	No	No, we do not agree with the proposed solution as we do not see reason to change an already working solution that is provided by the existing flows and process. We do not see how the introduction of the proposed new flows will improve the process or the LDSO accountability.
Siemens	Yes	The solution recognises the involvement of the LDSO in Fault resolution and the need to improve communication between LDSO and other parties.
SmartestEnergy	Yes	BSCP514 is not clear on who is responsible for addressing faults found on Metering Equipment owned by an LDSO. As the Metering Equipment owner, the LDSO is best placed to investigate and resolve faults on Metering Equipment which it owns. We agree that a new process needs to be introduced to enable the Supplier to raise faults with the LDSO.
SMS	Yes	We agree with the proposed solution and think that it will improve performance.
SSE	Yes	We agree with the proposed solution, including the new data flow.
Stark	Yes	No comments
TMA	Yes	No comment
UKPN	No	Whilst we do not disagree with the principle of the proposed solution it is a partial overlap of the process that already exists within Section 30.5 of the Distribution Connection and Use of System Code (DCUSA)

Respondent	Response	Rationale
		"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 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 CP1525 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 that the draft redlining delivers the CP1525 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
14	1	1	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, do not support the solution proposed in its current format.
E.ON	Yes	No Comments
EDF Energy	Yes	Please see comments below; agree with proposed solution but a couple of errors in redlining.
ESP	Yes	No comments
IMServ	Yes	See comments on redline text below.
Northern Powergrid	Yes	But please see comment in Question 6 and the comments of the redlined text.
npower	Neutral	No comments
Scottish Power	Yes	Yes, we agree that the draft redlining delivers the CP1525 proposed solution.
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	None provided
SSE	Yes	No comments
Stark	Yes	BSCP515 section 3.15 is relevant to BSCP502 section 3.4.3 where MOA will issue DAXYZ to HHDC and supplier as fault rectification. If fault unresolved 5 days after LDSO is required to issue DAXYZ flow to HHDC as well as supplier & MOP. This would increase DC's visibility on fault involved LDSO. It also keeps the continuity of the open faults with the MOA when the issue is fixed by the LDSO.
TMA	Yes	No comment

Respondent	Response	Rationale
UKPN	Yes	In the narrow sense "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 is detailed later.

Question 3: Will CP1525 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
16	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Please refer to Question 4
E.ON	Yes	The main impact of CP 1525 will be process changes, as per the response to Q5 under CP1524.
EDF Energy	Yes	-System changes required to accept and process the new flows from and to LDSO. -Training of users to correctly process the new flows. -Review and potentially amend our grey IT.
ESP	Yes	As an LDSO, ESPE will be required to configure its DTN Gateway to send and receive the new dataflows. There will be minor amendments to existing asset condition management processes to incorporate and manage the new dataflows for metering equipment in particular. There will be no requirement for significant IT system changes to support this CP.
IMServ	Yes	As a MOA, yes, from several sources, primarily software development, testing & training As a DC, See response to CP1524
Northern Powergrid	Yes	No comments
Npower	Yes	Yes as it will amend the Half Hourly fault resolution process by implementing a new flow to provide updates, which will likely lead to system and operational changes.
Scottish Power	Yes	This change would result I 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	Development and implementation of system amendments to exchange the new communication data flows between MOA and LDSO.

Respondent	Response	Rationale
SmartestEnergy	Yes	We should see an improvement in transparency and the quality of data as a result of this modification.
SMS	Yes	There will need to be system and process changes within HHMOA to ensure that these are implemented and followed as this introduces new processes with the LDSO.
SSE	Yes	We may need to make some system and process changes to manage the new flow.
Stark	Yes	Impact will be relevant process change in the HH system to facilitate new data flow receiving from LDSO. Also, the whole fault investigation process in the HH system. 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 by CP1525.
UKPN	Yes	The prosed solution would require changes to process with the consequential training out to staff.
WPD	Yes	The introduction of the new data flows will involve system changes along with additional process and monitoring procedures.

Question 4: Will your organisation incur any costs in implementing CP1525?

Summary

Yes	No	Neutral/No Comment	Other
13	3	0	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
ESP	No	No comments
IMServ	Yes	As a MOA yes, although most costs associate will be development and these will be merged into CP1524. As a DC, please see our response to CP1524, given our view that this CP cannot be implemented independently, it serves no purpose to try and separate the costs.
Northern Powergrid	No	No comments
Npower	Yes	A detailed cost assessment has not been conducted but system changes will be required to accommodate a new flow.
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

Respondent	Response	Rationale
		medium or high change. There will also e costs in support of training development and delivery.
Siemens	Yes	One-off costs to develop and implement the system changes outlined in the answer to Question 3. The development of back office procedures and documentation to support the effective use of these new data flows.
SmartestEnergy	No	No comments
SMS	Yes	There will be cost incurred in implemented the changes to our processes and systems.
SSE	Yes	No comments
Stark	Yes	Resources costs involved with testing and implementing the required process update for Question 3.
TMA	Yes	Medium cost
UKPN	Yes	*CONFIDENTIAL RESPNOSE*
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 5: Do you agree with the proposed implementation approach for CP1525?

Summary

Yes	No	Neutral/No Comment	Other
11	5	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Centrica is of the view that the proposed implementation approach is reasonable. However, do not support the solution proposed in its current format.
E.ON	Yes	No Comments
EDF Energy	Yes	No issues
ESP	Yes	A big bang approach ensures consistency across Parties during implementation.
IMServ	No	As a MOA we believe this must remain linked to CP1524 and development must happen at the same time. As a DC, what would happen at the point of cut-over with existing open faults that relate to DNO?
Northern Powergrid	Yes	No comments
npower	No	Please see our response to Q1.
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.
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	We agree with the implementation approach but think that the timescales involved are relatively short.
SSE	Yes	We agree with the 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 CP1524.
Stark	Yes	No comments

Respondent	Response	Rationale
TMA	Yes	No comment
UKPN	No	See above
WPD	No	We do not agree with the proposed implementation approach for CP1525. 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 6: Do you have any further comments on CP1525?

Summary

Yes	No
5	11

Responses

Respondent	Comments
IMServ	As a MOA, We would like to see CP1525 progressed, but we believe it should apply to both HH & NHH. As a DC, We think you are trying to say the Supplier will inform the LDSO who the new MOA is on change of Agent or Supplier event
Northern Powergrid	The introduction of this new method of reporting Half Hourly (effectively CT metering equipment) faults to LDSOs is in conflict with the current process for reporting such issues as detailed in MOCOPA and DCUSA. This BSC change requires the Meter Operator to report issues to Supplier. However, the MOCOPA has a requirement for the Meter Operator to report such issues to the Distribution Business (LDSO) (Schedule 5, Section 1.1.5 – Operational Restrictions and Reporting "The MOCOPA Operator shall also ensure that its Meter Operatives are aware of their responsibility to report to the Distribution Business any dangerous situations, defects or asset condition information which they encounter pertaining to its equipment or Sites in line with the DCUSA requirement for reporting such issues"). This is detailed in DCUSA Section 2A, Clause 30. The mechanism for reporting is via a D0135 dataflow using code B12 (DB owned CT metering equipment issue). The guidance for using this code is in the MOCOPA guidance for service termination issue reporting document. So, the issue is that the proposed BSC change does not reflect the existing requirement in MOCOPA for which party the Meter Operator should report the issue to and also runs the risk of double reporting some issues via both the D0135 and DAXYZ data flows. Therefore, the progression of the BSC change must also consider a change to the MOCOPA and DCUSA requirements for reporting potentially the same issue. We acknowledge that the DAXYZ data flow is for reporting risk of settlement issues only whereas the D0135 dataflow under the B12 code guidance is a wider scope as it also includes non-settlement risk issues such as missing test terminal block or damaged meter panel etc. However, we are in favour of a progression of the BSC change as we feel it is a better, more defined and controlled method of reporting settlement risk issues with CT metering but a change to MOCOPA and possibly DCUSA will likely be required to accommodate.

Respondent	Comments
npower	Similar to our response to CP1524, we think initial discussions are needed to see if the recommendations suggested by FIRG are still relevant.
Stark	Would like to understand the outcome from the MOCOPA Review Panel held on 13 Feb 20 to review whether the proposed changes would introduce irregularities or confusions (requirement for MOA to inform LDSOs of fault) against the proposed solution in CP1525.
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.

In addition to the consultation responses, we also received comments from BUUK Infrastructure They believed that:

- There should be a rejection process in place in the instance that we are not:
    - The correct I/DNO party to contact; or
    - Responsible for the issue
- There should be a contact provided at the Supplier/MOA and LDSO, so the issue can be discussed and hence resolved in a timely manner. This will be especially useful where we need to meet on site to undertake a joint investigation/testing element.

BSCP502

Respondent	Location	Comment
Northern Powergrid	3.4.3.A.3	Typo – resolve not resovle
	3.4.3.A.4 & 3.4.3.A.5	Refers to days rather than working days (WD). Presume should be WD? Repeated in 514 and 515.
	3.4.3.A.6	There is reference to 5.4.2.3.B. This does not exist.
	3.4.3.A.6	If challenging Expected Action Date… Is "Expected Action Date" a defined term and is it the same thing as "expected resolution date" as referred to in 3.4.3.A.5? If so change one or the other for standard terminology. Repeated in 514 and 515.
IMServ	3.4.3.A.10	We believe the HHDC should also be notified at this point
	3.4.3.A.12	Once the fault is fixed, the actions refers you back to Go to 3.4.3.3this doesn't seem to be the appropriate ref.
WPD	3.4.3.A.4	Should read "5WD" not "5 days"
	3.4.3.A.5	Should read "5WD" not "5 days"
	3.4.3.A.6	"If challenging Expected Action Date provided by HHMOA within 2WD of 5.4.2.3.B". The HHMOA will not have provided the Expected Action Date where the LDSO is responsible for the metering equipment. The reference to "5.4.2.3.B" is an invalid reference.
	3.4.3.A.10	Typo "Notify that the fault remains unresolved. And provide a revised expected resolution date." Remove full stop and amend to lower case "a".
	3.4.3.A.12	The requirement to "Go to 3.4.3.3" – If fault remains unresolved 5WD after receipt of D001 and is not identified as a fault with LDSO owned Metering Equipment – creates a circular process. We believe that the Action should be similar to CP1524 where, once the MOA has resolved the fault and notified the Supplier and HHDC they are directed to undertake any steps in process 5.3.4 which may be appropriate. Therefore the action should be: 3.4.3.A.12 On receipt of D[AXYZ] from LDSO Send Fault Resolution Report From Supplier To HHMOA D[AXYY] Fault Resolution Report

BSCP514

Respondent	Location	Comment
EDF Energy	5.4.2.4.A & 5.4.2.4.B	Should state 5WD not 5 days
WPD	5.4.2.4.A	Should read "5WD" not "5 days"
	5.4.2.4.B	Should read "5WD" not "5 days"
	5.4.2.5	"If challenging Expected Action Date provided by HHMOA within 2WD of 5.4.2.3.B". The HHMOA will not have provided the Expected Action Date where the LDSO is responsible for the metering equipment.
	5.4.2.9	Typo "Notify that the fault remains unresolved. And provide a revised expected resolution date." Remove full stop and amend to lower case "a".
	5.4.2.11	"On receipt of D[AXYZ] from LDSO go to 5.4.1.5" The requirement to "Go to 5.4.1.5 – If fault remains unresolved 5WD after receipt of D[AXYZ]" creates a circular process. We believe that the Action should be similar to CP1524 where, once the HHMOA has resolved the fault and notified the HHDC and Supplier, they are directed to undertake any steps in process 5.3.4 which may be appropriate. Therefore the action should be: 5.4.2.11 On receipt of D[AXYZ] from LDSO Send Fault Resolution Report From Supplier To HHMOA D[AXYY] Fault Resolution Report. A further section could be added to the effect that 5.4.2.12 On receipt of D[AXYY] Fault Resolution Report Undertake any steps in process 5.3.4 which may be appropriate. From HHMOA

BSCP515

Respondent	Location	Comment
WPD	3.15.4	Should read "5WD" not "5 days"
	3.15.5	Should read "5WD" not "5 days"
	3.15.6	"If challenging Expected Action Date provided by HHMOA within 2WD of 3.15.5". The HHMOA will not have provided

Respondent	Location	Comment
		the Expected Action Date where the LDSO is responsible for the metering equipment. In addition, without sight of the proposed data flows clarity is required on whether the D[AXYZ] is to be sent when the Expected Action Date is rejected and when the Expected Action Date is accepted.
	3.15.10	Typo "Notify that the fault remains unresolved. And provide a revised expected resolution date." Remove full stop and amend to lower case "a".
	3.15.12	"Go to 5.4.1.4.C". This is an invalid reference.