

# CP Consultation Responses

## CP1529 'Earlier initiation of Supplier Agreed Meter Readings process'



This CP Consultation was issued on 11 May 2020 as part of CPC00804, with responses invited by 8 June 2020.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
EDF	2	Supplier, Supplier Agent (Not Stated)
Ovo Energy	2	Supplier, NHHDC
Scottish Power	2	Supplier, NHHDC
SSE Energy Supply Limited	1	Supplier
Stark	4	NHHDC, NHHDA, HHDC, HHDA
TMA Data Management Ltd	4	NHHDC, NHHDA, HHDC, HHDA

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
EDF	✓	✓	✓	✓
Ovo Energy	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✓	✓
Stark	✓	✗	✗	✓
TMA Data Management Ltd	✓	✓	✓	✓

## Question 1: Do you agree with the CP1529 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

### Responses

Respondent	Response	Rationale
EDF	Yes	This aligns with our ideals to improve customer experience and to get accounts billed in a more reasonable timeframe. This will also help align processes to meet the industry desire to implement the policies of quicker switching.
Ovo Energy	Yes	OVO supports the earlier initiation of the Supplier Agreed Meter Readings process as this will improve the timeliness of obtaining missing readings for the CoS process and aid in the accuracy of data entering the Settlement process.
Scottish Power	Yes	We agree with the proposed solution as this will streamline industry processes in line with Ofgem's Switching Programme and align with MAP CP0328.
SSE Energy Supply Limited	Yes	We agree that allowing suppliers to initiate the Supplier Agreed Meter Readings process at an earlier stage will reduce the risk of higher numbers of suppliers settling on estimated data once Faster Switching is implemented.
Stark	Yes	Gives the NHHDC & Supplier greater degree of control over avoiding estimated reads & better facilitates the move towards faster switching process.
TMA Data Management Ltd	Yes	We agree with the proposed solution, although please see our comment in Question 6

## Question 2: Do you agree that the draft redlining delivers the CP1529 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
5	0	0	1

### Responses

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

Respondent	Response	Rationale
EDF	Yes	
Ovo Energy	Yes	
Scottish Power	Yes	We agree with the drafting redlining delivers the proposed solution for the CP to update BSC504 with the new timescales.
SSE Energy Supply Limited	Yes	
Stark	Yes/No	Overall agree with draft redlining however would like clarification with regards to the D311 flow. Detailed below.
TMA Data Management Ltd	Yes	

## Question 3: Will CP1529 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

### Responses

Respondent	Response	Rationale
EDF	Yes	Minor changes to flow processing and timescales across several systems. Potential increase of resource to work exceptions within the condensed timescales. There will be additional pressure on manual flow chasing and responses via e-mail, especially for bulk requests. Work instructions, procedures and controls will need to be re-assessed and amended where necessary as a result of these changes.
Ovo Energy	Yes	There will be changes to reporting and processes and consequently business readiness activities.
Scottish Power	Yes	Process and system changes will be required as part of the CP to align the new timescales proposed in BSC504.
SSE Energy Supply Limited	Yes	Some system and process changes may be required, and due to the ongoing impacts of coronavirus there may be resource constraints however this is difficult to predict.
Stark	No	Minimal impact as technical development work already taking place in system connected to this process.
TMA Data Management Ltd	Yes	Minor changes will be needed to systems and processes to incorporate the new timescales.

## Question 4: Will your organisation incur any costs in implementing CP1529?

### Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

### Responses

Respondent	Response	Rationale
EDF	Yes	There will be one-off costs to implement changes into our software applications to allow for the changes to the timescales of data flow processing and handling. In addition we expect to incur on-going resource costs to handle the increased scope of work especially around the 2WD email response timescale.
Ovo Energy	Yes	There will be an associated one-off cost to implement the changes outlined in the response to Question 3.
Scottish Power	Yes	We will incur a one-off cost to implement this change, cost to be confirmed.
SSE Energy Supply Limited	Yes	There may be some one-off costs relating to system and process change.
Stark	No	No cost specific to CP as technical development work already resourced.
TMA Data Management Ltd	Yes	We will incur costs making changes to align our processes with the updated timescales, we do not expect these to be significant.

## Question 5: Do you agree with the proposed implementation approach for CP1529?

### Summary

Yes	No	Neutral/No Comment	Other
6	0	0	0

### Responses

Respondent	Response	Rationale
EDF	Yes	It would be beneficial for this change to be implemented as soon as possible as 30 working days is perceived as too long suppliers to interject to attempt to resolve CoS issues.
Ovo Energy	Yes	
Scottish Power	Yes	We agree with the proposed implementation approach by allowing for suppliers to initiate the Supplier Agreed Reading process at an earlier stage, which will help in the reduction of suppliers settling on estimated data.
SSE Energy Supply Limited	Yes	
Stark	Yes	CP1529 is being raised as a consequential change to MAP CP 0328, therefore aligning implementation of this CP seems logical.
TMA Data Management Ltd	Yes	Yes we agree with the implementation approach.

## Question 6: Do you have any further comments on CP1529?

### Summary

Yes	No
2	4

### Responses

Respondent	Response	Comments
EDF	Yes	<p>Data quality is still going to be an issue as a number of agents do not hold valid data at 30 working days. This also becomes a problem in relation to mismatch conflicts between metering and read data when inherited from another agent. With this change we need to make sure not to create a culture of flows being sent with inaccurate information just to meet quicker timescales and therefore emphasis should also be placed into the quality of data provided by agents, for example through the Performance Assurance Techniques in the Performance Assurance Framework.</p> <p>There will be increased pressure on DC agents to resolve exceptions before the 15 working days deadline resulting in potential increase in resource. Much of the CoS process is automated in NHHDC up to SSD+10 so does not leave much time for manual intervention before disputes are being raised.</p> <p>Escalations to certain agents are not being responded to within 10 working days currently so there is some uncertainty that changing to two working days will improve on this.</p> <p>Smart metering however should reduce the problems associated with this process so higher percentage of smart installations should allow for more agents to meet this revised process in time.</p> <p>These changes need to be assessed with several other processes within smart metering. The transition to legacy from smart, upon commissioning failure, via the D0367/D0170 process will reduce the timescales further to chase old agents for data and will need to not conflict with the new timescales.</p>
Ovo Energy	No	
Scottish Power	No	



Respondent	Response	Comments
SSE Energy Supply Limited	No	
Stark	No	
TMA Data Management Ltd	Yes	Our one comment is on the shortening of the timescale of 3.2.6.19 to 2 WDs. With 3.2.6.18 being a method of "Post / Fax / Email or other method as agreed." these requests can be received as anything between an email on a single MPAN to a spreadsheet of any format containing a many MPANs. There will therefore always be manual work around these processes. Could the method of 3.2.6.18 be changed to be "Electronic or other method, as agreed" and the Information be changed to "D0170 Request for Metering System Related Details"? This would increase slightly the system changes needed but would allow more automation of this process.

**BSCP504**

<b>Respondent</b>	<b>Location</b>	<b>Comment</b>
Stark	3.2.6.20	<p>Clarification regarding the use of D0311 flow required; current process footnote 37 indicates that this is for domestic premises only, whereas no such restriction is detailed in DTC.</p> <p>Discussions during Issue group meeting suggested this should also apply to non-domestic premises also. In our experience with non-domestic only Supplies, requests for this flow have been mainly ignored, even with the correct request code on the D0170 being used, however the implication here is that this is a requirement.</p>