

# CP Consultation Responses



## CP1536 'Use of DTC data flow D0379 for submission of unmetered Half Hourly data'

This CP Consultation was issued on 10 August 2020 as part of CPC00806, with responses invited by 7 September.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Power Data Associates Ltd	0/1	Supplier Agent: MA
Tym Huckin Ltd	0/1	Supplier Agent: MA
SMS Energy Services Limited	0/1	Supplier Agent
Scottish Power	0/1	Supplier Agent
Siemens MAS	0/1	Supplier Agent
E.ON UK	1/1	Supplier, Supplier Agent: HHDC, NHHDC, MOA
Stark	0/1	Supplier Agent: HHDC; HHDA; NHHDC;NHHDA

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Power Data Associates Ltd	✓	✓	✓	✓
Tym Huckin Ltd	✓	✓	✓	✓
SMS Energy Services Limited	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✓
Siemens MAS	✗	✓	✓	✗
E.ON UK	✗	✓	✓	✗
Stark	✓	✓	✓	✓

## Question 1: Do you agree with the CP1536 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Improve data resilience, audit trail, automation, data granularity. We have seen frequent occurrences of data we have submitted to the HHDC not being processed. This has resulted in incorrect customer billing and incorrect settlement data. The use of a formal DTC flow will ensure a clear audit trail via the DTN gateway but also enable HHDCs to automate the flow processing, which some have failed to achieve using emails.
Tym Huckin Ltd	Yes	ICTL agrees that the DTN would provide a more robust method of sending the HHDC data.
SMS Energy Services Limited	Yes	We agree that receiving data via data flow reduces the risk of HHDCs missing data sent via email and provides a robust auditable trail.
Scottish Power	Yes	We agree with the CP1536 proposed solution, however as there is no obligation on the MA to use the new method, we may end up seeing no benefit from the change.
Siemens MAS	Yes with caveat	<p>Siemens are supportive of a move to mandating the use of DTC flows for the provision of unmetered HH data and the consistent method of transfer of data between Meter Administrators and HHDCs is to be welcomed. However, the use of the D0379 may provide difficulties for HHDCs that do not currently process Supplier Service data through their C&amp;I systems. This may result in the need to make a system change to receive a new dataflow and store data within that flow to the required level of precision.</p> <p>We believe that the use of the D0003 sent via the DTN Gateway, where possible, would be a better fit for the change for two reasons: (1) the D0003 holds consumption data at the level of precision required for the D0036; and, (2) HHDCs in receipt of unmetered data but not Supplier Serviced data</p>

Respondent	Response	Rationale
		<p>would not need to amend their systems to accept a new flow.</p> <p>It is recognised that there would need to be a change to the D0003 to accommodate this change by making the Meter Serial Number and Meter Register Id “dumb fields”, when sent by the Meter Administrator, and to add a further value of “U” in the Reading Type field. As with the D0379 a change to the list of participants that can send the flow to include MAs will also be required.</p> <p>However, should the D0003 be excluded as an option then allowing MA access to the DTN to process the D0379 is preferable to the current manual process.</p>
E.ON UK	No	<p>We reject the proposal mainly based on the fact that the existing process works currently, whereby data is loaded correctly and the trail is auditable. Further work would be required to update our systems and processes and it is not clear that the benefit of the change would outweigh the costs.</p>
Stark	Yes but with some concerns	<p>We agree with that the proposed solution would:</p> <ul style="list-style-type: none"> <li>• Provide stakeholders with a DTN view of the audit trail of flows sent/received;</li> <li>• Reduce data errors which could occur where a HHDC might not process all the file attachments emailed by a MA. These failures would result in Settlement data errors and customer billing errors.</li> </ul> <p>We understand that the CP solution below would provide some flexibility as an “option” for the existing MA:</p> <ul style="list-style-type: none"> <li>• The CP solution stated that it allows the option to use the D0379 to send the data from the MA to the HHDC, in addition to the option of using email, offers the least change as it will not place any new obligations on the MAs to use the D0379 to send data, unless it wants to, nor does it amend the substance of the data being sent.</li> </ul> <p>However, we have some concern on the consistency of the receiving method from the MA (e.g. It will not be practical to track missing D0379s if MA were mixing both emails and DTN to send the UMS without notifying the HHDC). The new flow is designed for the DTN transfer so it can validate the file format and the required content.</p>

Respondent	Response	Rationale
		<p>Although it would be possible for the MA to issue the D0379 files via email to HHDC, it seems undermines the benefits of the DTN (e.g. provide a clear audit trail and validation check). There is a complimentary MRA CP for the MA so ideally, we would expect the MA to create the D0379 from their system and route over the DTN.</p>

## Question 2: Do you agree that the draft redlining delivers the CP1536 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	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
Power Data Associates Ltd	Yes	Use of the D0379 as it is an existing dataflow in UTC is sensible.
Tym Huckin Ltd	Yes	None provided.
SMS Energy Services Limited	Yes	None provided.
Scottish Power	Yes	We agree with the draft redline solution.
Siemens MAS	Yes	It may be worthwhile considering inclusion of the exchange between the MA and the HHDC within BSCP502 should the D0379 be made obligatory though it is recognised that BSCP502 defers to BSCP520 for UMS data collection.
E.ON UK	Yes	We agree the redlining delivers the proposed solution.
Stark	Yes	None provided.

## Question 3: Will CP1536 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	We will need to modify our Equivalent Meter to create files in the D0379 format as opposed to the existing format. We will need to ensure files are sent over our existing DTN gateway.
Tym Huckin Ltd	Yes	We will need to develop our software to accommodate the DTN. We have already started work on this in anticipation of this CP.
SMS Energy Services Limited	Yes	SMS Plc are an accredited HHDC, our documentation surrounding the receiving of data from MA will need to be updated to include the possible receipt of the D0379 flow (processes/training guides). Our flow directory and settlements system will need to be updated to enable the receipt of the D0379 flow from the new MA agent code.
Scottish Power	Yes	We agree this proposal will provide benefits to us by automatizing a process that is currently manual at the moment. Other than minor system changes we don't foresee this change creating any major impact on our organisation.
Siemens MAS	Yes	There is no obligation currently on HHDCs to hold consumption data to a Wh level and tables have been designed to accommodate the current kWh to 1 decimal point. There is also currently no obligation to field the D0379 data flow which is a new inbound flow for some HHDCs. The outbound process that builds the D0036 from consumption tables will also need amending to accommodate the rounding of MPAN UMS data.
E.ON UK	Yes	CP1536 will require both an update to our systems and our processes.
Stark	Yes	Impact will be relevant code change in the HH system to facilitate new data flows receiving.

Respondent	Response	Rationale
		Training in place for the D0379 UMS files process for the HH Team and relevant operations team esp. when tracking missing files or handling failed files.



## Question 4: Will your organisation incur any costs in implementing CP1536?

### Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Specification, Development, testing, operational procedure changes.
Tym Huckin Ltd	Yes	As we write our own software, the only costs we will incur are the ones for the use of the DTN. This is £132 per quarter plus data usage fees which will vary.
SMS Energy Services Limited	Yes	We will incur one-off costs to update the process/training documentation and the flow directory and settlement system circa one business day.
Scottish Power	Yes	There will be a cost involved but this has been estimated to be a low cost to implement this change.
Siemens MAS	Yes	As described in response to Question 3, there will need to be system changes to accept, process and maintain data from the D0379. This will be a one-off cost. By eliminating the use of manual submission ongoing process costs will be significantly reduced but an optional use of the D0379 will only reduce ongoing costs proportionate to the Meter Administrators uptake on this.
E.ON UK	Yes	We would incur minor IT costs to implement the system update.
Stark	Yes	Standard resources costs involved with planning, testing and implementing the required code changes for Question 3.

## Question 5: Do you agree with the proposed implementation approach for CP1536?

### Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

### Responses

Respondent	Response	Rationale
Power Data Associates Ltd	Yes	Big bang change is wise. Otherwise would have more complex development to support two different arrangements.
Tym Huckin Ltd	Yes	The D0379 seems to make more sense and has a reduced impact over the D0003 originally proposed.
SMS Energy Services Limited	Yes	None provided.
Scottish Power	Yes	We agree with the proposed implementation approach.
Siemens MAS	No	As an organisation we are currently managing the changes to Meter Technical Details that affect both HH and NHH systems. The MTD change is a fairly significant amendment requiring the same resource pool that would need to address the changes proposed for UMS. Should the proposal be accepted as is we would suggest delaying its implementation until June 2021.
E.ON UK	No	We are not comfortable with the implementation date of Feb 2021 given the testing that would be required to ensure the HHDC can receive the flow correctly from the MA and that this change would coincide with the D0268 changes. If the change were to go ahead, a change to the proposed implementation date would be preferred, perhaps to June 2021.
Stark	Yes	We believe it provides enough timeline for the system to update prior to the implementation date 25th Feb 2021.

## Question 6: Do you have any further comments on CP1536?

### Summary

Yes	No
0	7

### Responses

Respondent	Response	Comments
Power Data Associates Ltd	No	N/A
Tym Huckin Ltd	No	N/A
SMS Energy Services Limited	No	N/A
Scottish Power	No	N/A
Siemens MAS	No	N/A
E.ON UK	No	N/A
Stark	No	N/A