# CP1542 'Transfer the obligation to visit de-energised sites annually from Data Collector to Supplier'

This CP Consultation was issued on 8 March 2021 as part of CPC00810, with responses invited by 6 April 2021.

## Consultation Respondents

| Respondent | No. of Parties/Non-Parties Represented | Role(s) Represented |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | 3/0 | Distributor |
| IMServ Europe Ltd | 0/1 | Supplier Agent |
| Association of Meter Operators | 0/1 | Trade body |
| ScottishPower | 1/1 | Supplier, Supplier Agent |
| Siemens Managed Application Services | 0/1 | Supplier Agent |
| SMS Plc | 0/1 | Supplier Agent |
| SSE Energy Supply Limited | 1/0 | Supplier |
| TMA Data Management Ltd | 0/1 | Supplier Agent (HHDC, HHDA, NHHDA, NHHDC) |
| Utilita Energy LTD | 1/1 | Supplier, Supplier Agent |
| OVO Energy | 1/0 | Supplier (NHHDC, NHHDA, NHHMOA) |


© Elexon Limited 2021

## Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|---|---|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | ✖ | ✖ | ✖ | ✓ |
| IMServ Europe Ltd | ✖ | ✓ | ✓ | ✖ |
| Association of Meter Operators | ✖ | N/A | N/A | N/A |
| ScottishPower | ✓ | ✖ | ✖ | ✓ |
| Siemens Managed Application Services | ✖ | ✓ | ✓ | ✓ |
| SMS Plc | ✓ | ✓ | ✓ | ✓ |
| SSE Energy Supply Limited | ✓ | ✓ | ✓ | ✓ |
| TMA Data Management Ltd | ✓ | ✓ | ✖ | ✓ |
| Utilita Energy LTD | ✖ | ✓ | ✓ | ✖ |
| OVO Energy | ✓ | ✓ | ✓ | ✓ |

## Question 1: Do you agree with the CP1542 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 5 | 5 | 0 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | No | The BSC should remain as-is with the obligation for the annual inspection with the DC. Looking at the proposed 'solution' it's clearly good if the Supplier can make visit arrangements and then instruct their DC to attend the appointment. Our concerns are that:<br>• Suppliers may often lack names/contact details for sites recorded as de-energised in SMRS (as they aren't billing anyone) |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | • Occupiers of (nominally) de-energised sites benefitting from unbilled supplies are less likely to respond positively to Supplier approaches<br><br>Whilst we are not a supplier we have past experiences in data management site visits where it is surprising how many customers will refuse on the doorstep and it's arguably even easier to ignore letters or phone calls. We are concerned that under the new obligation if the Supplier only instructs their DC to visit after booking that could create a situation where an appreciable proportion (and those most at risk of having the wrong energisation status recorded) don't get visited. We consider that the obligation should be for the Supplier to instruct on an Annual Basis with that requirement to persist even in the absence of positive contact being achieved. |
| IMServ Europe Ltd | No | **HH and NHH General Comments:**<br>• There is no justification for the change as sufficient requirement on Suppliers is already stated in Sections J and S of the Code.<br>• The above requirement (and its location) has been sufficient to enable and encourage compliance in the HH Market, as proven by successful completion of annual site visits on HH de-energised sites by the HHDC, and for which the supplier part in process is not described in the associated BSCP.<br>• The responsibility for all Party Agent activities resides with the supplier and these are not reiterated in associated BSCPs, therefore doing so in this instance would be inconsistent.<br>• The HH and NHH models are different. The NHH model splits the DC role into two distinct activities of DR and DP, often involving different companies which affects clarity on responsibilities; this is further exacerbated by contractual and commercial arrangements. The HH model is different and simpler with no such split.<br>• The NHH issue needs to be resolved through commercial contracts and not through changes to BSCPs.<br>• The language and wording in the draft CSDs for HH and NHH is not aligned, even if |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | alignment across both markets were supported.<br><br>**HHDC Specifics** – this response is based on the clarification from ELEXON that the proposed change is with regard to annual inspections on de-energised sites only and not all sites, as proposed in the initial version. The assumption therefore is that this would include circa 10,000 site visits annually (extrapolated from IMServ numbers), for which Suppliers would/could need to implement processes to make such appointments and pass the ensuing information onto DCs, in order for them to conduct the visits.<br>• There is no justification for changing HHDC processes, as there have been no previous audit issues, concerns or known under-performance.<br>• The cost of change cannot be justified.<br>• The current process of HHDC managing all aspects of the annual site inspection on de-energised sites provides the following benefits; all of which would be detrimentally affected if Suppliers become involved in any aspect of the process, as per the proposal:<br>○ Efficient attainment of requirement whereby on CoS with no CoA, visit history is consulted to "freeze" due dates, rather than starting the clock again which creates extended gaps between visits.<br>○ Efficiencies in daily/weekly read scheduling as a result of having full control and visibility of **all** due site visits for **all** reasons for the **entire** portfolio.<br>○ Ability to prioritise certain types of read (e.g. high consumption faults) in planning as a result of having full control and visibility of all due site visits.<br>○ Most economic site visit price model as a result of above<br>○ Collection and verification of all relevant information required pre-job scheduling to enable a successful visit: to include address (more specific than industry provided one) local site contact |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | details, access arrangements, meter location, DNO attendance, business type etc.<br>○ Reduced number of hand-offs resulting in, a) reduced timescales to complete job and b) accuracy and integrity of information. |
| Association of Meter Operators | No | The need to visit de-energised sites on a regular basis is an essential part of the BSC framework to ensure settlement accuracy. The BSC framework was established in 1998 by setting out obligations on the Party Agents who were best placed to perform the roles, in this case the NHHDC & HHDC. These Party Agents are subject to Qualification and BSC Audit to ensure that they perform all the activities defined by the role. The Party Agent is reviewed against being able to perform these functions and the DTC dataflows reflect the interparty communication.<br>The need to visit de-energised sites within the BSC derives from the industry need to ensure public safety, minimise energy theft and the accurate allocation of energy charges.<br>Any reduced rigor surrounding these activities impact on the detection of unauthorised energy usage which is now covered under the REC and the correct allocation of Distribution Use of System charges under DCUSA.<br>The Consultation document addresses a number of aspects seeking to justify the proposed change:<br>• Supplier Licence Condition 21B – this does not distinguish between energised and de-energised supplies. 21B.4 requires "all reasonable steps to obtain a meter reading" at least once a year. This also reflects the current requirement in BSCP to visit all de-energised premises.<br>• Supplier not instructing NHHDC – the BSCP puts an obligation on the NHHDC to perform visits to de-energised premises. The Supplier has an obligation in the BSC to ensure their agents comply with the relevant BSC requirements and the respective BSCPs. If the Supplier and Party Agent have not covered these obligations in their contractual relationship then the Supplier is in breach of the BSC |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | and the Party Agent is not meeting its obligations under their Qualification.<br>• Access to de-energised sites – none of the Party Agent roles have a legal right to enter premises. Yet normal operations successfully achieve meter reading and meter work. Not all of this activity, particularly meter reading, requires a prior customer appointment. This is achieved through normal operational activities. The obligation is to visit the premises, if the premises is boarded up and inaccessible then the returned Site Visit Check will demonstrate the state. In addition, around 40% of metering points are in external meter boxes which are typically accessible without disturbing the customer.<br>The consultation document seems to be incorrect in the use within settlements of a EAC for a de-energised site. For NHH where a site is de-energised the EAC will not be included in settlement. For HH where there is no energy identified by the HHDC then no energy will be included in settlement, however when energy is detected it will be included. |
| ScottishPower | Yes | This change seems logical to site with the Supplier |
| Siemens Managed Application Services | No | We agree with the principles of CP1542, but we have concerns articulated in questions 6 and 9. |
| SMS Plc | Yes | N/A |
| SSE Energy Supply Limited | Yes | N/A |
| TMA Data Management Ltd | Yes | N/A |
| Utilita Energy LTD | No | Utilita reject CP1542. We believe the change fails to deliver any material benefits and creates significant costs for the following reasons:<br>• This mod will require new systems & processes to replicate work that Data Collectors have delivered and operate as BAU.<br>• Less than 1% of the MPANs in our portfolio are registered as de-energised. This mod would require months of |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | development work to continue the as is process for small number of sites.<br>• Any development work for suppliers will put further pressure on their resources, as suppliers are already updating their systems for industry wide initiatives such as the Switching Programme and the enrolment and adoption of smart meters in the DCC.<br>• It will increase the number of steps required to arranging a visit to site, to inform a DC to visit a site that their existing systems have already informed them they need to visit.<br><br>Furthermore, we question the single benefit listed in the change proposal of *"Suppliers have contact with the customer and are best placed to decide when visits should be conducted".* This modification is for supplies that have been de-energised for over a year without readings. Either the property has remained vacant for over a year, or it has been re-energised without the consumer informing us. In both cases, the chances of us having a reliable contact method in either scenario is very small.<br><br>Proceeding with this mod will create upfront development work for suppliers, a slower ongoing process with questionable benefit to either consumers or industry. |
| OVO Energy | Yes | We believe that shifting the onus to suppliers will better enable compliance with the requirement to visit a de-enegised site every 12 months. However, we would like to call into question whether visiting every site every 12 months is too stringent. Ensuring settlement accuracy, which we view as the main objective of this obligation, could be met by taking a risk based approach – taking a sample of sites to visit based on risk criteria. This mirrors the rationale taken by Ofgem back in February 2016 when they revoked the obligation on suppliers to visit sites every 2 years, as per Standard Licence Condition 12. This is further explored below. |


© Elexon Limited 2021

## Question 2: Do you agree that the draft redlining delivers the CP1542 proposed solution?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 6 | 3 | 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 |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | Yes | The proposed drafting would deliver the proposed solution (see above for comments on the solution). |
| IMServ Europe Ltd | No | • The draft red-lining extends further then the intended solution proposed by the workgroup, by indicating that the supplier becomes involved in the appointment process.<br>• Subsequent discussions with ELEXON identified that they did not intend for the supplier to become involved in the process, simply to be ultimately responsible for completion. The redlining and use of words does not reflect this.<br>• Responsibilities in the process are not clear due to the above points.<br>• There is no clarity on what Suppliers are expected to do even if the intention is solely to ensure completion. |
| Association of Meter Operators | No | The red-lining uses the trigger of 'annually' but does not define the commencement of the annual date. Presumably this should be to ensure that a visit occurs in advance of the anniversary of the MPAN becoming de-energised.<br>There also no timescale defined for how quickly the visit should occur after it is triggered.<br>This needs to be clarified if the proposal proceeds. |
| ScottishPower | Yes | N/A |
| Siemens Managed Application Services | No | See concerns in questions 6 and 9. |
| SMS Plc | Yes | N/A |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| SSE Energy Supply Limited | Yes | N/A |
| TMA Data Management Ltd | Yes with reservations | While the proposed redlining would definitely cover the obligation, I wonder whether the NHH requirement could be met without the need for D0005 and appointment visits, EG – de-energised sites held on 'A' read cycle. Could the way to meet this requirement be more open ended to allow for routine visits? In HH we would be thinking similar. Often downloads will already be performed via agreed supplier processes. Could the requirement be more open ended and not focussed on D0005 and appointment? |
| Utilita Energy LTD | Yes | We agree with the draft that the requirement for visits to de-energised sites should be moved into a more prominent position in the NHH code (BSCP504). Its current location as footnote is easily missed, and that a table format suggested as used for HH (BSCP502) would improve its visibility. |
| OVO Energy | Yes | N/A |


© Elexon Limited 2021

## Question 3: Will CP1542 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 2 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | No | No direct impact, but indirectly as the solution may lead to lower settlement accuracy as less premises will be visited and more sites will have erroneous energisation statuses. |
| IMServ Europe Ltd | Yes | However the scale of the impact cannot be quantified due to the confusion over what is being proposed. |
| Association of Meter Operators | N/A | N/A |
| ScottishPower | No | N/A |
| Siemens Managed Application Services | Yes | The NHHDC and HHDC roles are impacted. System and process changes are required. Current proposed implementation would lead to conflicts with HHDC site safety visits. Clarification to this relationship would have implications to the magnitude of the resultant changes. |
| SMS Plc | Yes | As noted by a member of the SVG, having Site Visits pre-arranged by the Supplier could interfere with our own scheduled visits, however, we can work with the Suppliers to ensure that requirements are met.<br><br>Additionally, we will have to update our business processes regarding Supplier requested DC site visits for both NHH & HH. |
| SSE Energy Supply Limited | Yes | We do not anticipate that the necessary changes will be very large, but we have yet to do a full impact assessment. |
| TMA Data Management Ltd | Yes | The obligation being moved to supplier would be positive for us. We would also be impacted by the need to deliver this on behalf of suppliers although we already do this presently with the obligation on NHHDC. |
| Utilita Energy LTD | Yes | This modification will require Utilita to develop and implement new systems and processes to ensure |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | the monitoring and scheduling of de-energised sites, as well as the monitoring of any exceptions.<br>We are in the process of implementing fundamental changes to our systems and processes to meet requirements for the Switching Programme and the Enrolment and Adoption of Smart Meters into the DCC. The proposed implementation date for this mod is February 2021, which means its development would have to overlap with the above projects.<br>With the small number sites and limited benefits stated in the proposal, this mod cannot be implemented until the above has been delivered (circa Feb 2023). However, based on the current drafting we do not think this mod should proceed at all. |
| OVO Energy | Yes | See question 4 |

## Question 4: Will your organisation incur any costs in implementing CP1542?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 6 | 3 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | No | Not directly (see also answer to question 3). |
| IMServ Europe Ltd | Yes | However the scale of the costs cannot be quantified due to the confusion over what is being proposed. |
| Association of Meter Operators | N/A | N/A |
| ScottishPower | No | N/A |
| Siemens Managed Application Services | Yes | There will be one-off costs for system and process changes. There will be ongoing costs associated with these requests and site visits. |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| SMS Plc | Yes | One-off Business process updates and related system updates.<br><br>On-going management costs around pre-arranged site visit dates and increased D0005 flow traffic. |
| SSE Energy Supply Limited | Yes | We believe that there will be extra costs of appointing a third party to carry out site visits where the appointed DC cannot carry them out, and there will be costs to Suppliers in managing this process. |
| TMA Data Management Ltd | No | N/A |
| Utilita Energy LTD | Yes | We expect a high level of upfront development costs, as well as ongoing costs to run the process based on our answer to question 3.<br><br>As stated in question 3, our concern is that to meet the requirements for this mod before its implementation date could affect our ability to meet deadlines for other industry projects. Especially when considered against the lack of proposed benefits to suppliers or consumers in delivering this change. |
| OVO Energy | Yes | Costs will not be insignificant. |

## Question 5: Do you agree with the proposed implementation approach for CP1542?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 7 | 2 | 1 | 0 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | Yes | We don't agree with the approach but in our view the proposed implementation would be functional. |
| IMServ Europe Ltd | No | A decision on whether to progress this CP cannot be taken because it will not be possible to draw any conclusions from the responses, as it will not be evident as to how respondents interpreted the proposals, or which version of reference documents they based their responses upon. |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| Association of Meter Operators | N/A | N/A |
| ScottishPower | Yes | Agree with February 2021 implementation |
| Siemens Managed Application Services | Yes | The suggested timescale for the implementation is achievable. |
| SMS Plc | Yes | N/A |
| SSE Energy Supply Limited | Yes | Yes, we believe that the implementation approach will provide sufficient time for Suppliers to make the necessary changes to their business processes. |
| TMA Data Management Ltd | Yes | N/A |
| Utilita Energy LTD | No | The proposal has very limited benefit analysis for change with less than 10 months to implement. |
| OVO Energy | Yes | We believe that this should be implemented in line with the audit year |

Question 6: Do you agree with the proposed redlining removing the obligation on Data Collectors to automatically make an annual site visit to de-energised sites with no working communications and replace it with an obligation on suppliers to arrange a visit and then instruct the DC to attend?

What impact on current DC processes would this have?

Would these process changes be feasible or cause challenges in DC business operation?

## Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 4 | 5 | 0 | 1 |

## Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | No | See question 1. |
| IMServ Europe Ltd | No | Please see all previous comments. |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | Discussions with ELEXON highlighted this was not the intention however to answer the question, this proposal cannot be justified from any perspective. Why would 100 plus Suppliers wish to expend, time, effort, cost and resource in implementing a task which either is already, or could be, managed adequately well by Party Agents.<br>Furthermore this would increase Party Agent costs and charges, introduce inefficiencies in schedules, result in time delays and lost opportunities to do other jobs, increase the risk of incomplete information and compromise the ability to successfully complete a visit.<br>This does not improve settlement accuracy. |
| Association of Meter Operators | No | As stated above there is no justification for changing the obligations as currently stated. There is benefit in leaving the DC with the obligation to initiate a site visit prior |
| ScottishPower | Yes | There will be no impact on the DC process for our organisation and the changes would be feasible. |
| Siemens Managed Application Services | No | The following would need to be covered in the redlining to make the BSCP instructions clear:<br>• The BSCP should make it explicit that the Supplier arranges the visit with the customer and then informs the DC in that order.<br>• Timings that the Supplier should follow and the notice period provided to the HHDC to arrange site visits should be defined. Suggest this is one-month notice.<br>• The content of the de-energised meter site visit needs to be clarified. Specifically, whether the read observed at the visit is returned for reconciliation of the meter advance.<br>• Depending on the meter visit content clarification above, consideration needs to be given to the relationship with measurement class C site safety visits which include an assessment of consumption on deenergised meters (section 4.1.8).<br>The new wording on BSCP504 is ambiguous regarding health and safety. It suggests that the Supplier should instruct the NHHDC to visit the site annually for, amongst other things, health and safety concerns. Suggested wording is “Suppliers should instruct NHHDCs to collect NHH Metered |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | Data where the MS is de-energised or due to MS not functioning correctly on an agreed date. This visit should also highlight any health and safety concerns". |
| SMS Plc | Yes | We agree with the redlining removing the obligation on DCs and placing this with the Suppliers to arrange and then instruct. Suppliers have a holistic view of agent related activities taking place at site and can co-ordinate accordingly, DCs do not have this view.<br><br>As a DC we would need to update our processes to accommodate the pre-arranged site visit, this may have a knock-on effect with our other scheduled work, however, we would look to make arrangements with the Suppliers to ensure that these requests are facilitated. This change is not unfeasible.<br><br>Whether the consumer is a DC Direct Customer or a Supplier Customer, suppliers will always have a 'way in' to the consumer and therefore the number of successful visits will increase. |
| SSE Energy Supply Limited | Yes | We believe that this will simplify DC processes as it will remove an obligation on the DC party. |
| TMA Data Management Ltd | Yes with reservations | While the proposed redlining would cover the obligation, I wonder whether the NHH requirement could be met without the need for D0005 and appointment visits, EG – de-energised sites held on 'A' read cycle. Could the way to meet this requirement be more open ended to allow for routine visits? In HH we would be thinking similar. Often downloads will already be performed via agreed supplier processes. Could the requirement be more open ended and not focussed on D0005 and appointment? Enforcing D0005 and special visits on this scenario would have an impact on some of our processes where this is currently managed via routine visits |
| Utilita Energy LTD | No | Requiring suppliers to send dataflow instructions to get Data Collectors to visit site will increase the number of points where this process could fail. Any Dataflow format issues could prevent the instructions from being sent or received. This could lead to sites not being visited, and additional administration for both supplier's and DC's to process exceptions. |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| OVO Energy | Yes | Rather than visiting every site, we believe that perhaps a risk based approach which uses sampling would be more cost effective without being at detriment to settlements. This could be based on age and use a two-yearly turnover.<br><br>Smart meters that are in comms should also be removed from the requirement, as remote inspection can be performed. In this vein, we also believe that the volume of sites that would require a manual on-foot site visit would diminish over time as smart meter penetration increases over time.<br><br>We believe that cost benefit analysis should also be undertaken to ascertain cost to implement (eg cumulative cost of site visits) vs cost to settlements. This CBA would then lead the frequency at which it is required to perform a site visit.<br><br>Furthermore, we would like to call in question whether we should we put the onus back onto the DNO, as these will need to be migrated into CSS. |

## Question 7: Do you anticipate that this solution will have any impact on the accuracy of Settlement of sites recorded as de-energised in SMRS?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 8 | 0 | 1 | 1 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | Yes | We consider that it would be likely to lead to more sites being recoded as de-energised – if the supplier can't contact the customer they won't instruct the DC to visit. |
| IMServ Europe Ltd | Yes | This will have a negative impact as less visits will occur, there will be a lower success rate and therefore less validation of the status will be undertaken. |
| Association of Meter Operators | Yes | The rigor surrounding the inspection of de-energisation visits is essential to ensuring that settlement and theft are minimised. Leaving the |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | obligation with the DC will have a greater opportunity of being actively managed that with the Suppliers.<br>Without being explicit with the timescales for triggering visits or for a timescale in which the visit should occur after being triggered there is likelihood that the frequency of visits will extend, allowing de-energised sites which are actually consuming energy to be excluded from settlements for even longer. |
| ScottishPower | Neutral | Questionable, this is still reliant on access. |
| Siemens Managed Application Services | Yes with caveat | Subject to the concerns raised in other questions being resolved, CP1542 should have a positive impact on settlement as it encourages all agents to maintain the correct energisation status of a site. |
| SMS Plc | Yes | An increase in successful visits will produce an increase in accurate energisation labelling of supplies. |
| SSE Energy Supply Limited | Yes | This solution is likely to lead to more de-energised sites being visited, and so more sites should be able to be confirmed as de-energised and allow EACs to be replaced with AAs in Settlements. |
| TMA Data Management Ltd | Yes | Moving obligation to supplier is likely to increase supplier engagement on the subject |
| Utilita Energy LTD | Yes | This mod raises a small risk of sites not being visited, which increases the risk of sites which are incorrectly recorded as de-energised not being discovered and corrected. |
| OVO Energy | Yes | However, the impact may be potentially negligible - the volumes of sites that are clocking usage are small. We believe that an answer to this question should be answered through the piece of cost benefit analysis as mentioned above. |

## Question 8: Do you think that this will impact Settlement Risk 16 and the control strength? If you believe there will be an impact, will the impact be positive or negative and to what scale?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 8 | 0 | 2 | 0 |


© Elexon Limited 2021

## If yes, will the impact be positive or negative?

| Positive | Negative |
|---|---|
| 4 | 4 |

## Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | Yes | False energisation statuses are a key risk and we are pleased to see this recognised by SVG and additional questions asked on this. The mandatory annual visit by the DC was specifically intended as a control in this area. Removal of the annual obligation with lead directly to more erroneous energisation statuses in settlement. |
| IMServ Europe Ltd | Yes | Negative – see all other responses. |
| Association of Meter Operators | Yes | The rigor surrounding the inspection of de-energisation visits is essential to ensuring that settlement and theft are minimised. Leaving the obligation with the DC will have a greater opportunity of being actively managed that with the Suppliers.<br><br>The change will also have an impact on the Risk associated with energy theft.<br><br>Without being explicit with the timescales for triggering visits or for a timescale in which the visit should occur after being triggered there is likelihood that the frequency of visits will extend, allowing de-energised sites which are actually consuming energy to be delayed from resolving potential theft issues.<br><br>The regular sites visits are important to ensure the safety of the installation to public and third parties. It has been known for de-energised supplies to be re-energised illegally without meters and/or without appropriate cut-fuses. Prompt identification of these issues allows Meter Operators to attend site and rectify the situation. |
| ScottishPower | Neutral | If access improves then this would be a positive impact on risk 16 but all depends on improved access overall. |
| Siemens Managed Application Services | Yes with caveat | Subject to the concerns raised in other questions being resolved, CP1542 should have a positive impact. We believe the HH controls to be more |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | rigorous already, so we believe the impact to be more positive for NHH. |
| SMS Plc | Yes | The impact will be positive, we are unable to provide a view on scale. |
| SSE Energy Supply Limited | Yes | We believe that there will be a small positive impact as more site visits will confirm that sites are de-energised and are not using electricity. |
| TMA Data Management Ltd | Yes | Helps to facilitate delivery of annual reads. Any which pick up on incorrect data will allow this to potentially be revised within RF. |
| Utilita Energy LTD | Yes | With only a handful of de-energise sites, we expect the settlement risk to be limited.<br><br>However, the solutions outlined in BSCP502 and BSCP504 will increase risk by adding complexity to visiting sites. |
| OVO Energy | N/A | No comment - see above |

## Question 9: Do you agree that the proposed solution should align the NHH and HH process?

### Summary

| Yes | No | Neutral/No Comment | Other |
|---|---|---|---|
| 8 | 1 | 0 | 1 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | Yes | As a matter of principle HH & NHH processes should be aligned wherever possible. |
| IMServ Europe Ltd | No | See answer to . 6 and 7 |
| Association of Meter Operators | Yes | Aligning the obligations would seem logical |
| ScottishPower | Yes | Agree both HH & NHH should align |
| Siemens Managed Application Services | Yes with caveat | We believe that the site safety visits for measurement class C are already adequate for checking consumption on de-energised and |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | therefore alignment to NHH should be limited to measurement classes E and G. |
| SMS Plc | Yes | As both a HH and NHH Agent, having the processes aligned reduces the differences in the business processes we are required to follow. |
| SSE Energy Supply Limited | Yes | Aligning both processes will provide consistency across the market sectors. |
| TMA Data Management Ltd | Yes | N/A |
| Utilita Energy LTD | Yes | We support a solution that aligns HH and NHH processes. As it stands, the existing solution for both HH (BSCP502) and NHH (BSC504) already align to have the DC responsible for obtaining readings for de-energised sites after 12 months. We so no reason for this to change. |
| OVO Energy | Yes | N/A |


© Elexon Limited 2021

## Question 10: Do you have any further comments on CP1542?

### Summary

| Yes | No |
|---|---|
| 4 | 6 |

### Responses

| Respondent | Response | Rationale |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | No | N/A |
| IMServ Europe Ltd | Yes | The consultation has been compromised by:<br>• Confusing content and communications<br>• Change report intentions not accurately reflected in draft CSDs<br>• Unintended scope creep<br>• Updates to documents during the consultation, resulting in significant and material difference to what was proposed – not all clearly version marked.<br>• Inability to identify any respondent's assumptions, understanding or version of document referenced when responding, therefore not possible to compare opinion or use responses to support progression. |
| Association of Meter Operators | Yes | As noted in the consultation this failing has existed for several years, being noted in the BSC Auditors report in 2018-19 and has been included in the BSC Auditors Market Issues report annually, yet no Party Agent or Supplier has been highlighted to PAB as failing to comply. The inference is that the Suppliers and Party Agents are actually complying with the BSC or there is a failing in the Performance Assurance framework to bring this failing to the attention of PAB.<br><br>As noted in the consultation document Section J1.2.1 & J1.2.5 are directly relevant:<br><br>"(a) in the case of a Party Agent appointed by a Party pursuant to paragraph 1.2.1, that Party shall be responsible for every act, breach, omission, neglect and failure of such Party Agent (in relation to that Party) and shall itself comply, and shall procure compliance by such Party Agent, with the relevant provisions of the Code and of Code Subsidiary Documents…" |


© Elexon Limited 2021

| Respondent | Response | Rationale |
|---|---|---|
| | | If there is a failing, then the respective Supplier should be ensuring that the Party Agent should be remedying the failing to bring themselves into compliance with the BSC. Bringing themselves into compliance may include revised commercial arrangements, but that is outside the scope of the BSC.<br><br>The arguments presenting in the consultation document indicating that the obligation to ensure the Party Agent comply with the BSCP requirements could be extended to everything in the BSCP, requiring the Supplier to explicitly request the Party Agent to do every process with the BSCP – this is plainly not how the BSC and its subsidiary documents were envisaged. |
| ScottishPower | No | N/A |
| Siemens Managed Application Services | No | N/A |
| SMS Plc | No | N/A |
| SSE Energy Supply Limited | Yes | A number of DCs appointed to sites with smart and AMR meters dial up meters remotely and do not perform site visits. Therefore, it is likely that Suppliers will have to employ DCs other than those appointed to perform the site visits.<br><br>Also, this new process could be more difficult for Suppliers to manage where there are customer appointed agents, as the customer has the links to the DC, and the Supplier in this instance may also to send out DCs other thon those appointed to visit sites. |
| TMA Data Management Ltd | No | N/A |
| Utilita Energy LTD | Yes | As stated in question 1, Proceeding with this mod will create upfront development work for suppliers, a slower ongoing process with questionable benefit to either consumers or industry.<br><br>It is only by maintaining the current supplier agnostic approach, that this process can be scheduled efficiently. Data Collector remain the best equipped to schedule and administer readings in bulk. |
| OVO Energy | No | N/A |


© Elexon Limited 2021

## CP Redlined Text

### BSCP502

| Respondent | Location | Comment |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | N/A | N/A |
| IMServ Europe Ltd | N/A | N/A |
| Association of Meter Operators | N/A | N/A |
| ScottishPower | N/A | N/A |
| Siemens Managed Application Services | N/A | N/A |
| SMS Plc | N/A | N/A |
| SSE Energy Supply Limited | N/A | N/A |
| TMA Data Management Ltd | N/A | N/A |
| Utilita Energy LTD | N/A | N/A |
| OVO Energy | N/A | N/A |

## CP Redlined Text

### BSCP504

| Respondent | Location | Comment |
|---|---|---|
| UK Power Networks (EELC, LOND & SEEB) | N/A | N/A |
| IMServ Europe Ltd | N/A | N/A |
| Association of Meter Operators | N/A | N/A |
| ScottishPower | N/A | N/A |
| Siemens Managed Application Services | N/A | N/A |


© Elexon Limited 2021

| Respondent | Location | Comment |
|---|---|---|
| SMS Plc | N/A | N/A |
| SSE Energy Supply Limited | N/A | N/A |
| TMA Data Management Ltd | N/A | N/A |
| Utilita Energy LTD | N/A | N/A |
| OVO Energy | N/A | N/A |


© Elexon Limited 2021