

# CP Consultation Responses

## CP1555 'Provision of consumption data to Distributors for Measurement Classes G and F'



This CP Consultation was issued on 8 November 2021 as part of the November 2021 CPC Batch, with responses invited by 3 December 2021.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
UK Power Networks	1 / 0	Distributor
Scottish and Southern Electricity Networks	1 / 0	Distributor
IMServ Europe Ltd	0 / 1	Supplier Agent - HHDC
The Electricity Network Company Limited	1 / 0	Distributor
Power Data Associates Ltd	0 / 1	Supplier Agent - MA
Energy Assets Networks Ltd	1 / 0	Distributor
Siemens MAS	0 / 1	Supplier Agent - HHDC
Scottish Power	0 / 1	Supplier Agent - HHDC
Stark	0 / 1	Supplier Agent – HHDC, HHDA, NHHDC, NHHDA
TMA Data Management Ltd	0 / 1	Supplier Agent – HHDC, HHDA, NHHDC, NHHDA
Western Power Distribution	1 / 0	Distributor

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
UK Power Networks	✗	✓	✓	✓
Scottish and Southern Electricity Networks	✗	✓	✓	✗
IMServ Europe Ltd	✗	✓	✓	✗
The Electricity Network Company Limited	✓	✓	✓	✗
Power Data Associates Ltd	✗	✗	✗	✗
Energy Assets Networks Ltd	✗	✓	✓	✗
Siemens MAS	✓	✓	✓	✗
Scottish Power	✓	✓	✓	✗
Stark	✓	✓	✓	✓
TMA Data Management Ltd	✓	✓	✓	✗
Western Power Distribution	✓	✓	✓	✓

## Question 1: Do you agree with the CP1555 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	5	0	0

### Responses

Respondent	Response	Rationale
UK Power Networks	No	<p>We do not agree with the proposed solution.</p> <p>The impact on systems and processes of this volume of data is not justified for the intent to which it will be used.</p> <p>Data for MC F is not required as this measurement class is for domestic customers who do not require banding.</p> <p>The allocation of non-domestic MC G sites to TCR charge bands for the current TCR period is achieved using an average annual consumption value over a two-year period and does not require HH period level data.</p> <p>Were all data collectors to fully comply with BSCP502 and send D0010 data for all of these sites, there would be no need for sourcing data externally for this change. This process could then continue without the disturbance to data volumes and DCs that this CP will cause.</p> <p>D0036 files are used in a number of our systems. By sending MC F and G data in D0036 files we estimated a doubling of system resources will be required at present volumes. This includes disk storage, processing, flow movement and processing time will double, causing delays in the systems. For example, the DUoS billing system will receive twice as many D0036 files. The system will then spend twice as long validating them in order to determine the data required for billing MCs C, D, E. It would then discard the MC F and G data. Over time there will be considerable increases in the volumes as more customers move into these MCs.</p> <p>In addition to system changes we believe there would be further electrical costs for the increased volumes of data/dataflows.</p>

Respondent	Response	Rationale
Scottish and Southern Electricity Networks	No	<p>This is not acceptable in its current form. The existing process specified in BSC 502 does not contain any mechanism or procedures for rectifying data quality issues. As a LDSO we have noticed a significant deterioration in the timeliness and quality of the data sent by Data Collectors/Suppliers and there are no formal procedures described in BSC 502 to redress this. As the numbers of MPANs in measurement classes F and G are at least an order of magnitude above the numbers we currently process this is likely to result in a similar magnitude of increase in the number of issues we experience with MPAN data. This would be unacceptable.</p>
IMServ Europe Ltd	No	<p>We do not agree with this CP and strongly suspect it cannot be cost justified.</p> <p>Has it been established that the current D0010 flow does not satisfy the requirements being driven by the TCR review, nothing in the attached CP suggests this, only that "Many LDSOs do not use D0010 Meter Read data", implying that some DNOs do use the D0010 and therefore no D0036 or D0275 is required to satisfy DNO requirements?</p> <p>Other approaches should be considered.</p> <p>For example, perhaps DNOs could contract directly with HHDCs, has the change itself been cost justified against such an approach? The costs of this CP should also be compared to the cost of DNOs developing their systems to use the D0010, has this been done?</p>
The Electricity Network Company Limited	Yes	<p>We agree with the proposed solution on the basis that the change isn't intended to implement a new approach to billing but will make provision for receipt of MC F &amp; G data to carry out tariff setting activities only. Any change to billing arrangements would require significant &amp; unnecessary further system &amp; process change.</p> <p>We also disagree with the proposed February 2022 implementation date &amp; believe a June 2022 implementation is much more reasonable to allow appropriate testing &amp; system change (see Question 5 response).</p> <p>Please also consider that MC F is domestic data &amp; so may present data protection concerns. Has a data protection impact assessment been carried out?</p>

Respondent	Response	Rationale
Power Data Associates Ltd	No	<p>The differential in the solution is between DCC enrolled metering and not-DCC enrolled. This is different to MC=F &amp; G. BSCP502 drafting uses the differentiator in the heading of 3.4.6 including its footnote. Each of these is subtly different. What is the requirement and therefore expectation?</p> <p>It is not clear how Distributors will use this data in conjunction with NHH data for any particular MPAN to determine the TCR banding. Any MPAN can flip from HH to NHH over the coming years</p> <p>The CP does not consider the option of using a D0380 for all data provided by HHDC to LDSO. This may be a simpler solution to avoid the need to differentiate between different customers. It also future proofs the solution in anticipation of MHHS.</p> <p>CP1536 introduced the provision of MA-HHDC data using the D0379. BSCP502 was not updated to enable (or require) this more granular D0379/D0380 data to be passed to Supplier, Distributor and HHDA to a similar granular level. This inconsistency has recently been discussed at UMSUG, with a desire to require the HHDC to pass on the data in a D0379/D0380. This would be resolved if all the data for all MPANs the HHDC sent out was in D0379/D0380 format.</p> <p>By proposing the introduction of the D0379/D0380 the provision of the D0010 in 3.4.6.11 should be removed as it an unclear requirement and it serves no purpose. The LDSOs do not and are unable to use the data in a D0010 for any DUoS charging as it is not defined in the CDCA methodology.</p>
Energy Assets Networks Ltd	No	<p>We do not believe it would be appropriate to use the existing D0036s or D00275s for DCs to provide the MC F and G HH data to LDSOs. Our rationale is that to use the existing dataflows would require significant changes to LDSO billing systems. The D0036s/D0275s are automatically routed to the billing engine which will not be able to differentiate between D0036s/D0275s to be used for standard HH invoicing and D0036s/D0275s to be used for determining consumption for MC F and G. Even if validation on measurement class was possible, there is no reference to measurement class in either flow. An alternative would be for the D0036s/275s for MC F &amp; G to be delivered outside of the DTN e.g. emailed and password protected as the P222s are now. This would not require a system change to</p>

Respondent	Response	Rationale
		<p>our router and/or billing system and the processes for P222s could be utilised.</p> <p>As the D0380 would be a new data flow for LDSOs, we would not have to amend our billing system but instead would require another method/IT system to interrogate the data for MC F and G. The assumption is that all MC F &amp; G MPANs have DCC-enrolled metering.</p> <p>The change proposal justifies the use of the above flows over the D0010s as 'many LDSOs do not use D0010 Meter Read data and believe it may be more costly to make system changes' but in our opinion, utilising the D0036/275s used for invoicing would require a change to the billing system to carve out MC F and G data; use of the D0380 would require updates to existing or the introduction of new systems and processes to be able to process the 'new' flow. All 4 data flows would require changes to existing systems so we do not understand why the D0010 has been dismissed from the outset. Using the existing D0010s does not require a new recipient to be added to the flow. The D0010s also include Maximum Demand data which may also assist the LDSOs with the correct allocation of TCR bands.</p> <p>So whilst we do not agree with the proposed solution in its entirety, we do support the intent of the change proposal.</p>
Siemens MAS	Yes	If D0010s do not satisfy the requirements of the Targeted Charging Review with HH data now required for MC F and G MSIDs then the most sensible option is for HHDCs to add LDSOs to the list of recipients of the D0036/D0275 and D0380 (see question below on D0379).
Scottish Power	Yes	ScottishPower agrees with the proposed solution, for the Half-Hourly data to be used by LDSO's.
Stark	Yes	We (HHDC) understand the reason of this request. However, we expect DISTs would be prepared for the required process change and the DTN routes configuration ready for the D0036, D0275 and D0380 files delivered from other agents.
TMA Data Management Ltd	Yes	As these sites have Half-Hourly data it makes sense for this to be used by the distribution businesses.
Western Power Distribution	Yes	We have indicated our agreement with the proposed solution, however, whilst we have

Respondent	Response	Rationale
		<p>sponsored this change and are supportive of the principles and underlying reasons for the change being raised, we do have reservations based on the feedback we have received from our Durabill Service Provider.</p> <p>The points raised make us very concerned as to the impact the volume of additional data will have on our ability to process data coming through our Durabill system in accordance with our SLAs.</p> <p>We believe that consideration should be given to removing the requirement to include Measurement Class F within this change proposal which would reduce the volume of additional data and processing time.</p> <p>Currently DNOs are not permitted to get HH data per MPAN through a Smart Meter but are able to collect HH data per feeder.</p> <p>We would also highlight that the implementation date is also quite challenging particularly as resources are committed to the Faster Switching Programme. Consideration could be given for a later implementation date as a stand-alone release.</p>

## Question 2: Do you agree that the draft redlining delivers the CP1555 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
6	3	1	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	Yes	Yes for the purpose of the proposed solution. But the proposed solution is not a good outcome for the underlying problem.
Scottish and Southern Electricity Networks	N/A	It may deliver the proposed solution, but that solution is unacceptable
IMServ Europe Ltd	Yes	-
The Electricity Network Company Limited	Yes	No additional comment, noting response to Question 1.
Power Data Associates Ltd	N/A	-
Energy Assets Networks Ltd	No	We do not agree with the solution proposed.
Siemens MAS	No	<p>Although the version of BSCP502 correctly removes the exclusion of MC "F" and MC "G" from the information sent in the D0036/D0275 I believe other changes should be made to the BSCP and existing "errors" in the BSCP should be corrected. These are listed below:</p> <ol style="list-style-type: none"> <li>Following Section 3.4.1.12 (it doesn't appear to have its own reference) – remove the requirement of HHDCs to send D0010s to LDSOs</li> <li>Section 3.4.6.11 – remove the requirement of HHDCs to send D0010s to LDSOs</li> <li>Section 3.4.6.10 – Should the LDSO have the option of receiving the D0379 given it has the option for the D0036/D0275 equivalents?</li> <li>Section 3.4.6.10 – An existing error in the BSCP is that the HHDC can return the D0379</li> </ol>



Respondent	Response	Rationale
		<p>or D0380 to the Supplier. This is an opportune time to make that change.</p> <p>See below for comments on the Market Message (D0380).</p>
Scottish Power	Yes	ScottishPower agrees the redline changes will deliver the solution.
Stark	Not entirely. Please clarify further questions.	<ul style="list-style-type: none"> <li>Since the requirement to send D0380 to DIST is new (to HHDC), would you please clarify, are we expected to send this flow (if required) to DIST for ALL Measurement Classes or only F &amp; G?</li> <li>In the CP1555-B-BSCP502-Draft Redlining_v33.1, section 3.4.1.12, does HHDC require to send the D0010 meter reads (if actual read data available) to LDSOs for Metering Systems registered to any either Measurement Class F or G as well as the D0036/D0275?</li> <li>Would the decimal point in the D0380 flow cause any "data discrepancy" issue with the D0036/D0275 as the situation in the Unmetered Supply data?</li> <li>Is it possible to know how many LDSOs process the D0010 flows sent by the HHDC? We wonder if LDSOs don't process/use that then why does it require in the BSCP502?</li> </ul>
TMA Data Management Ltd	Yes	-
Western Power Distribution	Yes	-

## Question 3: Will CP1555 impact your organisation?

### Summary

High	Medium	Low	None
3	4	3	1

### Responses

Respondent	Response	Rationale
UK Power Networks	Yes	The Distributor role will be impacted by significant system cost increases across three of our systems that use D0036 data. Storage, processing and reporting will be impacted. There is also a concern that increased processing times may not be achievable and that this would knock on to affect other dataflows and processes.
Scottish and Southern Electricity Networks	Medium	Large increase in data storage requirements Large increase in resources required to redress data issues.
IMServ Europe Ltd	Low	Although we have indicated a low impact and low cost, IMServ's internal systems have a finite capacity for processing work, there are also a finite number of hours in a day. Burdening these systems with unnecessary work will eventually lead to the need in significant investment in more hardware, software and staff.  For example, there have been a significant number of recent changes such as P383, P395 (and potentially P419) that have placed further reporting requirements on us as HHDC/DA. Eventually, significant further investment would be required to support further requirements.
The Electricity Network Company Limited	Medium	There will be a systems impact, with our DUoS billing system in particular requiring amendment. We understand, from our IT service provider for this system, that a lead development time of 25-30 days is needed to make system changes. We will have to carry out additional testing & integration once this is complete.
Power Data Associates Ltd	None	-
Energy Assets Networks Ltd	Yes - High	Yes, either of the solutions proposed (including the use of D0010s if it is an avenue to be explored) would require system changes.

Respondent	Response	Rationale
Siemens MAS	Yes - Low	We will need to make some code and standing data changes to systems that manage our industrial and domestic HH portfolios.
Scottish Power	Medium	Yes, the HHDC system will be affected, changes will need to be made to the cutting of consumption data for these sites to Distribution businesses.
Stark	Yes - Low	Low in terms of implement the process change. However it could be infeasible to during with failed files caused by DISTs failed to configure their DTN gateway to receive the relevant flows.
TMA Data Management Ltd	Medium	Yes, the HHDC system will be affected. Changes will need to be made to the cutting of consumption data for these sites to Distribution businesses.
Western Power Distribution	High	We believe there will be a high impact on our system and processes. In order to accommodate the anticipated volume of information requiring to be processed, system changes will have to be made. Should the change be amended to remove Measurement Class F, the impacts will be less and reduce to a medium/low.

## Question 4: Will your organisation incur any costs in implementing CP1555?

### Summary

High	Medium	Low	None
1	2	6	2

### Responses

Respondent	Response	Rationale
UK Power Networks	Yes	<p>UK Power Networks will face one off billing and other system costs and then continuing costs for data storage and data processing.</p> <p>Our estimated cost to implement and maintain this solution would be in the order of £800,000 over the first 5 years. There is also an additional knock on risk of additional processing times that may need further costs to remedy.</p>
Scottish and Southern Electricity Networks	Medium	<p>Large increase in data storage requirements</p> <p>Large increase in resources required to redress data issues.</p>
IMServ Europe Ltd	Low	<p>Set up costs:</p> <ul style="list-style-type: none"> <li>• Development</li> <li>• Testing</li> <li>• Documentation revision</li> <li>• Training</li> </ul> <p>Ongoing:</p> <ul style="list-style-type: none"> <li>• Producing the reports</li> <li>• Auditing</li> <li>• DTN costs</li> </ul>
The Electricity Network Company Limited	Low	Yes- no other comments.
Power Data Associates Ltd	None	-
Energy Assets Networks Ltd	Medium	Yes, we estimate the change to be £10-15k but have not had sufficient time to do a detailed cost analysis.
Siemens MAS	Yes - Low	Code changes and accompanying testing and implementation including post-implementation

Respondent	Response	Rationale
		checking will be undertaken to implement this change
Scottish Power	Low	Yes, there will be one off cost to change the system to send the data out in D0380 flows and there will be ongoing costs for sending data over the DTN. The volume of data sent over the DTN will increase by 1/3 for these sites.
Stark	Yes - Low	Exclude the operational costs in dealing any unexpected file issues caused by DTN configuration.
TMA Data Management Ltd	Low	Yes, there will be one off costs to change the system to send the data out in D0380 flows and there will be ongoing costs for sending data over the DTN, the volume of data sent over the DTN will increase by 1/3 for these sites.
Western Power Distribution	-	-

## Question 5: Do you agree with the proposed implementation approach for CP1555?

### Summary

Yes	No	Neutral/No Comment	Other
3	8	0	0

### Responses

Respondent	Response	Rationale
UK Power Networks	Yes	If this is to go ahead the implementation approach will deliver it.
Scottish and Southern Electricity Networks	No	Proposal is not acceptable
IMServ Europe Ltd	No	We do not believe we could deliver this new functionality by February 2022, particularly in the light of other more important changes that are in progress such as P375, P419 and so on.
The Electricity Network Company Limited	No	<p>We do not agree with the proposed implementation of February 2022 as based on expected change approval schedule there will not be adequate time for system testing &amp; necessary amendments to facilitate the change. As stated in response to Question 4, our IT service provider has advised a lead development time of 20-25 days following change approval. We require additional user testing &amp; integration on top of this.</p> <p>We disagree with the rationale that a February 2022 implementation is necessary to allow LDSOs to comply with impending TCR arrangements coming into effect in April 2022. Under DCUSA Schedule 32 para 4.2. (a)(iii), LDSOs already have provision to set HH charging bands based on "other available information that is appropriate for a typical profile of a similar site to best estimate the expected annual import consumption of the Final Demand Site". This provision facilitates the current bi-lateral agreement whereby Electralink provide LDSOs with data necessary to undertake band setting/allocation. The above provision &amp; arrangement already adequately allows LDSOs to fulfil their April 2022 TCR obligations, meaning there is no urgency to implement CP1555 prior to April 2022, particularly as parties would not have sufficient time to make necessary system amendments.</p>

Respondent	Response	Rationale
		On this basis, we believe implementation in the standard June 2022 release is more feasible & proportionate. As a potential compromise, we believe there is adequate time to amend systems if change were implemented in an extraordinary April 2022 release to coincide with the TCR arrangements.
Power Data Associates Ltd	No	Difficult to see how an SVG decision in Jan 2022 can be implemented in Feb 2022. It is not clear why this CP has taken so long to reach this point, when it was first discussed months ago.
Energy Assets Networks Ltd	No	No - timescales are exceedingly tight – changes to IT systems usually take at least 6 months to develop, test and roll out in to production.
Siemens MAS	No	It appears that DNOs currently receive D0036/D0275 and, possibly, D0379/D0380 flows direct from Electralink as a temporary solution and we believe that this could continue to allow for a delay in the long term solution of the data being provided by HHDCs. Like many companies at this time, we are about to enter a (Christmas) code freeze period and have a programme of work scheduled in the new year. We will also be providing resources to accommodate the annual audit that affects this area of work. The proposed implementation date would affect these plans and we recommend that the interim solution is retained until the June 2022 Release at the earliest.
Scottish Power	No	ScottishPower is not in agreement with the proposed implementation date of 24 February 2022. This change will require us to complete key system functionality changes. Our preference would be to implement in June 2022 to allow more time to implement.
Stark	Yes	Providing all the clarification has been made in the BSCP502 and no major setback from other participants before Feb 2022.
TMA Data Management Ltd	No	As this will require changes to key system functionality we would like more time to implement the changes, particularly as this is still in consultation phase and not agreed yet.
Western Power Distribution	Yes	Whilst we have indicated our agreement to the proposed implementation approach, we feel that the implementation date is quite challenging particularly as resources are committed to the Faster Switching

Respondent	Response	Rationale
		Programme. Consideration could be given for a later implementation date as a stand-alone release.



## Question 6: Do you have any further comments on CP1555?

### Summary

Yes	No	Neutral/No Comment	Other
1	0	10	

### Responses

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

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Currently data for these sites is aggregated and sent out in the XXJ groups within the D0040/D0298 flows from HHDA will any change be needed to this or will this be left as is?

**BSCP502**

Respondent	Location	Comment
Stark	CP1555-B-BSCP502-Draft Redlining_v33.1, section 3.4.1.12	Does HHDC require to send the D0010 meter reads (if actual read data available) to LDSOs for Metering Systems registered to any either Measurement Class F or G as well as the D0036/D0275?
	CP1555-B-BSCP502-Draft Redlining_v33.1 section 3.4.6.10	Since the requirement to send D0380 to DIST is new (to HHDC), would you please clarify, are we expected to send this flow (if required) to DIST for ALL Measurement Classes or only F & G?
		Would the decimal point in the D0380 flow cause any "data discrepancy" issue with the D0036/D0275 as the situation in the Unmetered Supply data?
		How many LDSOs process the D0010 flows sent by the HHDC? We wonder if LDSOs don't process/use that then why does it require in the BSCP502?

**D0380**

Respondent	Location	Comment
IMServ Europe Ltd	D0380	The draft redlining of the D0380 document contains a table/matrix with a heading of 'MM00001 - Request Metering System Investigation', is this correct?
Siemens	Title	The title of the message is incorrect
	Group 64L	The Validation Flag must not be included for the HHDC to Distributor roles
	General	What is the rationale for not allowing a D0379 (see comment above)?