ELEXON

CP Consultation Responses

CP1558 ‘New Registration data items and processes to support the MHHS transition’

This CP Consultation was issued on 7 March 2020 as part of the March 2022 CPC Batch, with responses invited by 1 April 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Salient Systems Ltd	3	Consultant, MOP systems provider, Solutions Provider
Northern Powergrid	1	Distributor
Siemens	1	Supplier Agent
SSE Energy Supply Limited	1	Supplier
Western Power Distribution	1	Distributor
UK Power Networks	1	Distributor
Scottish Power Energy Networks	1	Distributor
St Clements Services Limited	1	Service Provider
British Gas	1	Supplier

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Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Salient Systems Ltd	✓	✓	✓	✓
Northern Powergrid	✓	✓	✓	✗
Siemens	✓	✗	✗	-
SSE Energy Supply Limited	✗	✓	✓	✗
Western Power Distribution	✓	✓	✓	✗
UK Power Networks	✓	✓	✓	✗
Scottish Power Energy Networks	✓	✓	✓	✗
St Clements Services Limited	✓	✓	✓	✗
British Gas	-	-	-	-

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Question 1: Do you agree with the CP1558 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Northern Powergrid	Yes	We agree with the change however please see our response to 'Question 5' on the implementation approach and timing.
Siemens	Yes	The Code Change Development Group has identified key Metering System data items that are necessary for the operation of settlement under the MHHS arrangements. Siemens support the implementation of these data items under the current arrangements to manage any issues early and avoiding complexities when these data items have meaning under MHHS.
SSE Energy Supply Limited	No	We have concerns regarding any proposals that relate to MHHS, including CP 1558, which are raised within any Industry Code, but are outside of the MHHS Programme. There is a significant risk that should changes be raised and reviewed in isolation of the Programme that the intent of the proposals will be changed dependent on the audience that reviews them. The MHHS Programme should develop proposals against its agreed plan to ensure that at the point of consequential industry code changes, there will be minimal amendments required to implement them. This change currently being proposed has been raised against the current timelines with the assumption that milestone MHHS M5 will be met in April. We do not believe that any changes required should be completed outside of the MHHS Programme governance and that these should be held until a decision has been made as to whether there is likely be a delay to the programme as proposed under MHHS CR001 and CR002.

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<table>
<tr>
<td>Western Power Distribution</td>
<td>Yes</td>
<td>We understand the requirement to provide additional data items within SMRS (MPAS) to support the transition to MHHS.
We have been advised by our Service Providers that they have identified the following which we feel need to be addressed to ensure a robust and stable solution is achieved.

Connection Type.
• Missing the Connection Type of U for Unmetered
• Missing Connection Type Effective to date for a change of connection type
• Suggested Migration Solution: MPRS can back populate the connection type using the following logic:
<table>
<tr><th>Measurement Class</th><th>MC Description</th><th>Connection Type</th></tr>
<tr><td>A</td><td>Non-Half Hourly Metered</td><td>L</td></tr>
<tr><td>B</td><td>Non-Half Hourly Unmetered</td><td>U</td></tr>
<tr><td>C</td><td>HH Metered in 100kw Premises</td><td>H</td></tr>
<tr><td>D</td><td>Half Hourly Unmetered</td><td>U</td></tr>
<tr><td>E</td><td>HH Metered Sub 100KW CT</td><td>E</td></tr>
<tr><td>F</td><td>HH metered sub 100KW Domestic</td><td>L</td></tr>
<tr><td>G</td><td>HH Metered Sub 100KW Non Domestic WC</td><td>W</td></tr>
</table>
Further correction maybe required from LDSOs after initial population
• Are there any rules on how often an LDSO can change connection type?

Metered Indicator
• This is a distinct data item in MPRS. It was derived for a short period after MPRS R7.0 go live in 2018.
• Once CSS has gone live, this item will be fully in use and cannot be changed due to CSS Business Validation rules.

Energy Direction</td>
</tr>
</table>

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<table>
<tr><td></td><td></td><td>• Currently Derived using MS Specific LLFC Class Indicator (DI50370), MPRS can back populate this from the LLFC and store this as a distinct data item breaking the link from LLFC.
• Will MPRS need to validate a change to LLFC which has a different Energy Direction to the meteringPointEnergy flow?
• CSS Allows MPRS to make one change from Import to Export. The EFD of the value must be equal to the RMP Creation date. This Ignores the Retrospective Change Period
• Do you also need meteringPointEnergyFlowFromDate?

Associated Import Export
• Missing Import Export Association EFD & ETD to denote the start and end of an Association
• Validation suggestions:
- Association must be ended before Disconnection
- The Export MPAN Association EFD must equal the MP Status N EFD (the Export Metering Point creation date)
- Associations must not be future dated
- The Retrospective change period should apply to the Association EFD (the RCP will change with the reduced settlement timescale?)</td></tr>
<tr><td>UK Power Networks</td><td>Yes</td><td></td></tr>
<tr><td>Scottish Power Energy Networks</td><td>Yes</td><td>We agree with the solution with the following comments from our system provider:

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• Validation queries

- Is there a limit on how many Export MPANs can be associated to an Import MPAN?

• Reporting

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<table>
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<td></td>
<td></td>
<td>
- When will the report requirements be defined? We will need sufficient time to develop, test and for DNOs/iDNOs to implement this functionality in time for Feb 2023 Migration
- When will the Migration requirements be defined? We will need sufficient time to develop, test and for DNOs/iDNOs to implement this functionality in time for Feb 2023.
</td>
</tr>
<tr>
<td>St Clements Services Limited</td>
<td>Yes</td>
<td>
We agree with the solution with the following comments:

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Metered Indicator
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British Gas	N/A	With regard to the MHHS Programme we have not yet mobilized a project team to fully engage with the Programme and are therefore unable to provide any firm views as to whether the solution will fully meet the needs of market wide half-hourly settlement. We note that the baseline design has not been approved and therefore question how certain the Programme is that this

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		solution is sufficient there is not a risk that further data items may be required in the future.

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Question 2: Do you agree that the draft redlining delivers the CP1558 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
6		3	

Responses

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

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Northern Powergrid	Yes	Yes, we believe that the redlining to BSCPs delivers the high level detail on the new data items.
Siemens	N/A	See minor comment under BSCP501 below.
SSE Energy Supply Limited	N/A	We have not reviewed the draft redlining in detail.
Western Power Distribution	Yes	Although the redlining as drafted delivers the proposed solution within the BSCP 501 and BCSP 515, there are considerable system changes that will be required to support this change.
UK Power Networks	Yes	
Scottish Power Energy Networks	Yes	
St Clements Services Limited	Yes	
British Gas	N/A	

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Question 3: Will CP1558 impact your organisation?

Summary

High	Medium	Low	None
6		1	1

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Low	Changes to MO systems to support the D0312 flow changes
Northern Powergrid	High	Yes, the core MPAS system MPRS will require a number of changes to incorporate the new data items. This will in turn impact a number of our internal DNO interfacing systems and processes which will need changes to store and transfer the data items in to MPAS, including initial population, cleanse activity and ongoing maintenance.
Siemens	No	Although CP1558 will not induce an impact on our role as a Supplier Agent, it is recognised that there will be an impact under the corresponding REC change, R0032. The impact incurred by R0032 will be recorded under the REC governance but it is important that the changes are consistent.
SSE Energy Supply Limited	High	We have not completed a full analysis, but we believe the changes are likely to be significant.
Western Power Distribution	High	There will be considerable system changes and testing required to support this change. In particular our Service Provider has advised Modifications to the DB01 (Metering Point Creation) and DB02 (Metering Point Update) interfaces to add new Data items (CT & EDI) Creation of a new DB Flow and user interface for creation of Import Export Relationships Modification to the Incremental and Full ECOES extracts to include new data items

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		We are also cognisant that there will be a significant piece of work to populate and cleanse these data items which, although not part of this BSC CP, needs to be taken into consideration to ensure sufficient resource is available to undertake this work.
UK Power Networks	High	Our technical service provider has advised there will be modifications required to a number of MPRS messages (DB01 (Metering Point Creation) and DB02 (Metering Point Update), the create of a new message and the ECOES extract file will require some modifications.
Scottish Power Energy Networks	High	Changes will need to be made to MPRS system to: Modify the DB01 (Metering Point Creation) and DB02 (Metering Point Update) interfaces to add new Data items (CT & EDI) Creation of a new DB Flow and user interface for creation of Import Export Relationships Modification to the Incremental and Full ECOES extracts to include new data items. Internal changes to other internal systems to accommodate the following data: Connection type – the additional field required are not currently held in any internal system that interfaces with MPRS, development time and cost will be required to assess the correct source of this information and solution to make available. At this point this assessment indicates that more than 1 system will be required to be impact assessed for changes. Process changes – internal processes will require update as a result of this change, including an exercise to train staff in the changes. Internal data cleansing will also impact our business, as the requirements are not yet fully defined, some of this may be able to be carried out via a back population using derived data, however there will be elements that fall outside of this remit that will require manual investigation and liaising with other parties.
St Clements Services Limited	High	Modifications to the DB01 (Metering Point Creation) and DB02 (Metering Point Update) interfaces to add new Data items (CT & EDI) Creation of a new DB Flow and user interface for creation of Import Export Relationships Modification to the Incremental and Full ECOES extracts to include new data items
British Gas	N/A	

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Question 4: Will your organisation incur any costs in implementing CP1558?

Summary

High	Medium	Low	None
6		1	1

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Low/None	
Northern Powergrid	High	We are unable to undertake a detailed assessment due to the timescales of the consultation however our initial analysis estimates the costs to be in the region of £600k to £1m in one off costs. These costs include changes to our MPAN Generation, LDSO and Unmetered Supplies systems; changes to our batch scheduling tool and a share of the DNO MPRS development costs and implementation in to our environments. Costs are also incurred in terms of technical resources; project management, testing and data cleanse activities. Please note, the costs assessment is based on a number of assumptions and there may be impacts to other internal systems although we've had insufficient time to perform an in depth review of any further potential consequential changes.
Siemens	No	We will not be impacted by CP1558 but the corresponding change to R0032 will cause costs to be incurred. This will be recorded under the REC change governance.
SSE Energy Supply Limited	High	We have not completed a full analysis, but we believe there will be both one-off and on-going costs.
Western Power Distribution	High	We will incur one off costs from our Service Provider to deliver the MPRS software, together with our own system and document changes. In addition

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		costs will be incurred to resource the population and cleansing of these data items.
UK Power Networks	High	
Scottish Power Energy Networks	High	
St Clements Services Limited	High	
British Gas	N/A	

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Question 5: Do you agree with the proposed implementation approach for CP1558?

Summary

Yes	No	Neutral/No Comment	Other
1	6	1	1

Responses

Respondent	Response	Rationale
Salient Systems Ltd	Yes	
Northern Powergrid	No	We would question the planned introduction of data flows by February 2023 given there is a proposed delay to the delivery of the physical baseline to July or November 2022. We have concerns that changes are being implemented before the final design is baselined and believe that CP1558 should be delayed to coincidence with the delivery of the physical baseline to ensure that there are no changes to the requirements of CP1558 and to ensure that both MPRS and DNO internal system are not developed at risk and at a cost to the industry. In addition, the current timescales overlap with the early life support of the Faster Switching programme and potential post go-live change requests, which may detrimentally impact the availability of our service providers and our ability to implement the changes within the timescales.
Siemens	Cautiously	A significant number of changes are being imposed on the industry and we need to be mindful of this when determining implementation dates. It is also recognised that change proposals on the delivery of the M5 milestone have been submitted that may delay the design stage of MHHS. Although it is understood that the movement of the design milestone should not impact the MHHS implementation date, the potential movement of M5 will constrain the time between making changes to smooth the transition to MHHS and developing systems to meet the MHHS requirements. The same finite resources will be deployed to deliver both current market changes and MHHS deliverables. Ensuring

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		sufficient time for all activities needs to be recognised and any further changes need to be planned with resource constraints across the industry understood.
SSE Energy Supply Limited	No	As mentioned above, CP1558 is being proposed to be implemented against the current MHHS timelines, with the assumption that milestone M5 will be met in April. We do not believe that CP1558 should be completed outside of the MHHS Programme governance and that it should be held until a decision has been made as to whether there will be a delay to the Programme. Also, any changes which require system amendments should provide market participants with at least a 12-month implementation lead time from approval of the decision to ensure that participants have the resources available to initiate such changes.
Western Power Distribution	No	This MHHS stage 0 change is dependent on other industry changes to be coordinated (CP1558, R0032, R0010, stage 0 migration) and developing code for each change in isolation will be inefficient and potentially have an impact on each of the other industry changes. All these changes should be assessed together leaving sufficient time to develop and implement these changes. A delay to the implementation date is recommended in order for these changes to be properly defined and assessed. This implementation date should be delayed (possibly to June 2023). By utilising a delay it reduces overlap with the faster switching programme (early life support). During this period of early life support priority must be given to resolving any faster switching issues. This may have an impact on the capacity our Service Provider has to develop and test the MPRS code according to the proposed implementation date and with DNOs/iDNOs having more frequent production implementations. A delay in the proposed implementation date would also ensure that the necessary resources are available for us to carry out the necessary system changes and to fully test a robust solution. There is a proposal to change the MHHS physical baseline to July or November 2022. It is possible that the physical baseline will require changes to the stage 0 design (CP1558/R0032/R0010) resulting in late change and rework to MPRS. Therefore, delaying CP1558 would reduce the risk of late change being demanded.
UK Power Networks	No	Whilst UK Power Networks supports the nature of this CP, and the early introduction of these new data items. However, the MHHS Programme is currently considering both CR001 and/ or CR002 and the potential delay to the M5 milestone, to baseline the physical design. Any further delays to the M5 Milestone, could lead to a raft of change requests being raised and will potentially increase our costs and those of our technical

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		service providers too. Therefore, is there value in delay the implementation date to June 2023.
Scottish Power Energy Networks	No	We believe that this implementation should be delayed past Feb 2023, this would allow time for the Faster Switching Early Life support period and any resolution of urgent issues. It is our view that urgent resolution of any issues raised are a high priority for our system provider, and this may mean that development work to support MHHS Changes and provide sufficient time to test and implement may not be achievable. We are of the view that this change should be considered alongside the other Industry changes in the pipeline (R0032 and R0010) as this would be a more efficient use of resources. We also note that the proposed delay to the MHHS Physical baseline to either July or November, this may result in changes to the stage 0 design as it currently stands. We believe that a delay to the implementation date would allow all changes to be reviewed and developed in line with other changes and any late change as a result in a physical baseline delay. We would propose an implementation date of June 2023.
St Clements Services Limited	No	This MHHS stage 0 change is dependent on other industry changes to be coordinated (CP1558, R0032, R0010, stage 0 migration) and developing code for each change in isolation will be inefficient and potentially have an impact on each of the other industry changes. All these changes should be assessed together leaving sufficient time to develop and implement these changes. A delay to the implementation date is recommended in order for these changes to be properly defined and assessed. This implementation date should be delayed (possibly to June 2023). By utilising a delay it reduces overlap with the faster switching programme (early life support). During this period of early life support priority must be given to resolving any faster switching issues. This may have an impact on the capacity St Clements has to develop and test the MPRS code according to the proposed implementation date and with DNOs/iDNOs having more frequent production implementations. There is a proposal to change the MHHS physical baseline to July or November 2022. It is possible that the physical baseline will require changes to the stage 0 design (CP1558/R0032/R0010) resulting in late change and rework to MPRS. Therefore, delaying CP1558 would reduce the risk of late change being demanded.
British Gas	N/A	

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Question 6: Do you have any further comments on CP1558?

Summary

Yes	No
4	5

Responses

Respondent	Response	Comments
Salient Systems Ltd	Yes	Shouldn't the version number of the D0312 flow change from 002 to 003?
Northern Powergrid	No	
Siemens	No	
SSE Energy Supply Limited	No	
Western Power Distribution	Yes	We are also cognisant that there will be a significant piece of work to populate and cleanse these data items which, although not part of this BSC CP, needs to be taken into consideration to ensure sufficient resource is available to undertake this work. We will require timelines for Migration Activity, imports into MPRS and then then updating ECOES with this information.
UK Power Networks	No	
Scottish Power Energy Networks	No	
St Clements Services Limited	Yes	We require timelines for Migration and Reporting Requirements. We also need to know when the associated R0032 will be released for consultation. Timelines for Migration Activity, imports into MPRS and then then updating ECOES with this information.
British Gas	Yes	Although we have not assessed this change against the MHHS requirements we do have the following general comments:

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		Connection Type (DInew) – MTD can show CT or VT but there is no value for VT in this valid set, should there be? What happens if the value in this data item does not align with MTD? There needs to be an agreed process to rectify pre and post go-live. Metered Indicator – it needs to be clear if unmetered applies to an MPAN with no meter but which isn't UMSO. Associated Import/Export MSID – it would be useful to have some more info about how this would displayed and conveyed. Also will this only ever be a 1-2-1 relationship or could it be a one to many? One of the purposes of this item is "where common processes are needed for both Metering Systems.", if these processes include ones undertaken by MOPs etc how is it proposed the information is sent from suppliers to MOPs etc?

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BSCP501

Respondent	Location	Comment
Siemens	3.2.1	Are these data items comprehensive? If so, replace “e.g.” either with “i.e.” or remove the qualifier completely to be consistent with 3.6.1,3 .10.1 and BSCP515.

BSCP515

Respondent	Location	Comment

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