

CP Consultation Responses

CP1574 'Improving the use of the D0215 data flow in the relevant industry processes'

This CP Consultation was issued on 11 April 2023 as part of the April 2023 CPC Batch, with responses invited by 10 May 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
BUUK	1	IDNO
Centrica	1	Supplier
Electricity North West Limited	1	Distributor
IMServ	1	Supplier Agent
National Grid Electricity Distribution	1	Distributor
Northern Powergrid	1	Distributor
Scottish Power	1	Supplier Agent
Scottish Power Energy Networks	1	Distributor
Siemens	1	Supplier Agent
SMS	4	Supplier Agent (CVA MOA, SVA MEM/DC/DA)
SSE Networks	1	Distributor
UK Power Networks	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
BUUK	✓	✓	✓	✓
Centrica	✓	✓	✓	✓
Electricity North West Limited	✓	✓	✗	✓
IMServ	✓	✓	✓	✓
National Grid Electricity Distribution	✓	✓	✓	✓
Northern Powergrid	✓	✓	✗	✓
Scottish Power	✗	✓	-	✗
Scottish Power Energy Networks	✓	✓	✗	✓
Siemens	✗	✓	✓	✗
SMS	✗	✓	✓	✓
SSE Networks	✓	✓	✗	✓
UK Power Networks	✓	✓	✓	✓

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Question 1: Do you agree with the CP1574 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	3	0	0

Responses

Respondent	Response	Rationale
BUUK	Yes	
Centrica	Yes	
Electricity North West Limited	Yes	<p>We agree with the proposed solution.</p> <p>We do have a suggestion to further improve the proposed solution. The DNOs currently receive a significant quantity of D0170s through from MEMs who are not registered as the appointed MEM for the requested site. In these instances, the requesting party has requested the information before being entitled to receive it. When this occurs, we would suggest that the MEM should not receive the information until they are appointed by the customer/supplier. As currently drafted, DNOs are obliged to send this information through. We would suggest that the legal text should be amended to recognise that only the appointed MEMs can request the information via a D0170 and DNOs should not respond if the party is not the appointed provider.</p>
IMServ	Yes	<p>It's been long known that requesting a D0215 from LDSO early in the New Connection process delivers unreliable results and adds little or no value to the installation process, removing it as a mandatory requirement is a sensible move.</p>
National Grid Electricity Distribution	Yes	<p>Yes we agree with the proposed solution and that it delivers the</p>

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		recommendation from the BSC Issue 99 workgroup.
Northern Powergrid	Yes	We believe the draft legal text should reduce the volume of D0170s as long as the Meter Operators make the necessary changes and only request the MTD when it is genuinely required.
Scottish Power	No	We do not see an impact for NHH metering but we do for HH metering for new SVA installations. As a MEM, and in line with the P283 process, it is imperative that for all new connections that we receive the correct CT/VT ratios from the LDSO prior to installing the metering system (via either a D0215 or D0383 flows). This supports the accurate installation and commissioning of the metering system, as well ensuring that we are able complete our obligation to issue accurate MTDs to the Supplier within 10 working days. As proposed, we would not receive this information until the D0383 is received after the meter installation.
Scottish Power Energy Networks	Yes	SPEN are supportive of this proposal and believe it is a positive step in streamlining the process for the provision of technical details by aligning the process to the most relevant timescales and scenarios.
Siemens	No	The proposal will see a reduction in the volume of D0215 for LDSO however there is disagreement in the method in which this is achieved by placing the onus on the MEM to remedy a DNO issue.
SMS	No	<p>As a MOA we are not in favour of losing the ability to request a D0215 on CoMC or anywhere that the installation/use/upgrade of Measurement Transformers occurs, for example, on a new connection (where measurement Transformers are in use) we wish to ensure that we have as much information about the Measurement Transformers that will be or have been installed on site in advance of our visit. This information is not always supplied via the D0142 or in time via the D0383.</p> <p>Having reviewed and responded to R0017 we do not believe that CP1574 & R0017 mirror each other. BSCP515 updates to 3.3.3, 3.11 & note 7 seem at odds with Schedule 14 footnote 53 If required, and at any time after the effective date of the Metering Equipment Manager 's Appointment (and only for Metering Points first registered after 6 November 2008), the Metering Equipment Manager may</p>

		<p>request Site Technical Details by sending a D0170 'Request for Metering System Related Details' if Measurement Transformer Ratios and Class details have not been received. The Distribution Network Operator shall respond within 5 WD of such requests by sending a D0215 'Provision of Site Technical Details' or D0382 'Rejection Response for Request to Distribution Network Operator for Site Technical Details' either by electronic means or by another method, as agreed with the Metering Equipment Manager. The Metering Equipment Manager shall determine any appropriate course of action within 2 WD of receiving this information. This footnote does not limit when the SVA MOA can decide to request a D0215, whereas the wording in the relined BSCP515 does, and therefore limits the DNO's requirement to response.</p> <p>It is worth noting here that we agree D0215s are not required on any non-MT sites and as a MEM we do not issue D0170s as part of our CoA/CoS processes.</p>
SSE Networks	Yes	The information contained within the D0215 is not always utilised by the MOA, and in addition to this it is a labour-intensive manual process
UK Power Networks	Yes	<p>As LDSO we receive circa 200k+ requests per annum, from Meter Operators via the D0170 flow which results in the D0215 flow being sent out.</p> <p>A large proportion of these flows are requests following the "New SVA Metering system" installation process so the streamlining of this flow will reduce the number of irrelevant D0215's being sent at this stage of the end-to-end process.</p>

Question 2: Do you agree that the draft redlining delivers the CP1574 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	1	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
BUUK	Yes	
Centrica	Yes	
Electricity North West Limited	Yes	
IMServ	No	<p>Regarding the new footnote on page 10, its quoting three very specific scenarios:</p> <ul style="list-style-type: none">1) Missing MTDs3) MTDs present, but measurement transformers are missing (i.e. looks like WC)2) 'unknown' measurement transformers <p>I believe there is a fourth scenario where the MEM may also send a D0170 to the LDSO i.e. Where there are concerns regarding the accuracy of the CT/V ratios held i.e. the MEM holds values, but wishes to obtain a D0215 from LDSO to validate the information.</p> <p>Do you agree that this fourth scenario is valid, if so could/should it be reflected in the drafting?</p>
National Grid Electricity Distribution	Yes	<p>We agree that the draft redlining delivers the CP1574 proposed solution. We have highlighted two comments below.</p>
Northern Powergrid	Yes	

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Scottish Power	Yes	
Scottish Power Energy Networks	Yes	We have not identified any issue with the draft redlining
Siemens	Yes	Yes, removing the CoMC (SVA only) not requiring D0170/D0215 requirement delivers the intended results (fewer D0215s) however, there is disagreement in the method in which this is achieved by placing the onus on the MO to remedy a DNO issue.
SMS	Yes	
SSE Networks	Yes	
UK Power Networks	Yes	

Question 3: Will CP1574 impact your organisation?

Summary

High	Medium	Low	None
1	6	5	0

Responses

Respondent	Response	Rationale
BUUK	Medium	The systems changes required for us to implement CP1574 will be incorporated into existing system changes already being conducted for the purposes of the MHHS Programme and so the exact impact of this change is difficult to define precisely due to the overlap
Centrica	Low	
Electricity North West Limited	Medium	As noted in the CP, this change will reduce the number of D0170s which we will need to respond to.
IMServ	Medium	We need to review and amend/switch-off any automated D0170s we are sending i.e. D0170s automatically sent when New Connection/CoMC jobs are created.
National Grid Electricity Distribution	Medium	As a LDSO we will incur system and process changes in the implementation of this CP1574.
Northern Powergrid	Low	<p>The CP will have a positive impact on our organisation in that the volume of D0170s we receive should decrease resulting in a reduction in the required processing.</p> <p>In terms of “Formalising the requirements for LDSOs to send the D0215 flow following a change to the Site Technical Details” our processes already encompass this and there is no impact.</p>
Scottish Power	High	As per the response to Q1 – this will impact our operational obligations.

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Scottish Power Energy Networks	Low	CP1574 will affect our organization, only insofar as we will require to update process and training documents to reflect the change. Any other impacts (reduction in volume of requests etc) would be a positive impact.
Siemens	Low	Yes, this is a MoP change.
SMS	Medium	System updates to accommodate the removal of most of the system automation on sending the D0170 to DNO, additional system updates to allow for ad hoc sending of the D0170. Documented process updates to confirm required actions on when to use or not use a D0170.
SSE Networks	Medium	Reducing the number of D0215's will save time and effort in resource allocated to this work area. Any impacts will be positive.
UK Power Networks	Low	The benefits, of making this change out way any small costs that we may incur as LDOS – not only will we not be receiving as many requests, thus reducing the processing time on our internal applications but other parties the D0215 flows will be more relevant.

Question 4: Will your organisation incur any costs in implementing CP1574?

Summary

High	Medium	Low	None
0	2	5	4

Responses

Respondent	Response	Rationale
BUUK	Medium	
Centrica	Low	
Electricity North West Limited	None	No – the D0170 process is automated so there are no additional processing costs or IT change costs.
IMServ	Low	We still need to determine the exact nature of the change required, however we expect costs to be relatively low.
National Grid Electricity Distribution	Medium	As an LDSO we will incur one off costs for the system changes required to implement this change however, these will ultimately be off-set by the benefits of only receiving requests for Site Technical Details where there is value in having it.
Northern Powergrid	None	
Scottish Power	Not stated	
Scottish Power Energy Networks	None	We do not expect to incur any cost resulting from this change
Siemens	Low	Yes, this is a MoP change.
SMS	Low	One-off system development costs. One-off documentation updating costs. On-going manual issuing of D0170 costs.
SSE Networks	None	Implementing CP1574 will reduce costs for SSEN in the form of resourcing
UK Power Networks	Low	We may need to make a small change to our D0170/D0215 automated process, which ties in with the possible changes to the D0170 flow as part of MHHS so there may be a small cost

		under £2k for us to assess and make any changes. This will be a one-off cost.
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Question 5: Do you agree with the proposed implementation approach for CP1574?

Summary

Yes	No	Neutral/No Comment	Other
10	2	0	0

Responses

Respondent	Response	Rationale
BUUK	Yes	
Centrica	Yes	
Electricity North West Limited	Yes	
IMServ	Yes	
National Grid Electricity Distribution	Yes	We agree with the proposed implementation approach for CP1574 and that it should align with the associated REC R0017 implementation approach.
Northern Powergrid	Yes	
Scottish Power	No	
Scottish Power Energy Networks	Yes	
Siemens	No	There is disagreement in the method in which this is achieved will create more work for MEMs without any MEM benefit.
SMS	Yes	We agree with the approach & coordination with R0017; however, we do not agree with the solution.
SSE Networks	Yes	
UK Power Networks	Yes	Agree with the proposed implementation as it follows normal Industry Change timescales

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Question 6: Do you have any further comments on CP1574?

Summary

Yes	No
2	10

Responses

Respondent	Response	Comments
BUUK	No	
Centrica	Yes	Given that under MHHS the Registration Service and EES will be the source of meter details, would make more sense to add this data into EES meaning a MEM can access it whenever they require it (via GUI or API) with no impact on DNOs having to manually process D0170/215s
Electricity North West Limited	No	
IMServ	No	
National Grid Electricity Distribution	Yes	<p>The CP 1574 Consultation document under Impact and Costs incorrectly states that</p> <p>“We expect some SVA MOAs to make minor system changes to stop sending the D0215 flows in the processes outlined by the proposed Solution for this CP”</p> <p>The MOA sends a D0170 to request Site Technical Details not the D0215</p>
Northern Powergrid	No	
Scottish Power	No	
Scottish Power Energy Networks	No	
Siemens	No	
SMS	Yes	We believe that the solution needs to be reviewed and brought inline with

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		R0017, which we believe introduces the least risk.
SSE Networks	No	
UK Power Networks	No	

CP Redlined Text

BSCP515

Respondent	Location	Comment
National Grid Electricity Distribution	3.8.2	Should read 3.9.2