

CP Consultation Responses

CP1585 ‘Submission of D0275 or D0036 readings from HH connected Embedded Licensed Distribution System Operator (LDSO) sites to Host LDSO’

This CP Consultation was issued on 7 August 2023 as part of the August 2023 CPC Batch, with responses invited by 4 September 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Scottish Power	1	Supplier Agent (MEM)
Npower Commercial Gas Limited	1	Supplier, Supplier Agent
UK Power Networks	1	Distributor
IMServ Europe	1	Supplier Agent (HHDC)
Energy Assets Networks Limited	1	Distributor
National Grid Electricity Distribution	1	Distributor
UK Power Distribution	1	Distributor
Last Mile Electricity	1	Distributor
SMS PLC	1	Virtual Lead Party, Supplier Agent (CVA/SVA MOA, SVA DCDA)
Stark	1	Distributor, Supplier Agent (HHDC, NHHDC, HHDA, NHHDA, MOA)

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Scottish Power	✓	✓	✓	✓
Npower Commercial Gas Limited	✓	✓	✓	✗
UK Power Networks	✗	✓	✓	✗
IMServ Europe	✗	✓	✓	✗
Energy Assets Networks Limited	✗	✓	✗	✗
National Grid Electricity Distribution	✗	✓	✓	✗
UK Power Distribution	✓	✗	✗	✓
Last Mile Electricity	✗	✓	✗	✓
SMS PLC	✗	✓	✓	✗
Stark	✓	✓	✓	✓

Question 1: Do you agree with the CP1585 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	5	1	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Npower Commercial Gas Limited	Yes, with some reservations	<p>Whilst we agree that this will resolve the issue for embedded networks and visibility for Host DNO, we think that consideration on timing of this change should be made in relation to MHHS.</p> <p>The issue is already resolved in MHHS Design and therefore implementing a change to existing architecture at this stage, especially to a Supplier Agent function that will not exist in a post MHHS world appears to be a cost that could be avoided.</p> <p>Host DNO's have existed with this issue for some time and therefore we believe that MHHS would be a better solution.</p>
UK Power Networks	No	<p>In practice, aggregated IDNO data is received within two weeks of the month end. It is a DCUSA obligation to send this data as soon as reasonably practicable.</p> <p>The level of information currently provided is sufficient for our forecasts for price setting purposes.</p>
IMServ Europe	No	<p>If the current responsibility rests on IDNOs to pass data they receive to the LDSO and they are failing to do so, this is the area that must be addressed rather than a CP being raised just because it is expedient to do so to place the responsibility elsewhere.</p> <p>Enforcement of existing obligations as an approach has been completely ignored.</p> <p>Simply put what can't IDNOs simply forward on data received by the HHDC to the LDSO?</p> <p>Has this proposal had a cost justification exercise performed against it?</p>

Respondent	Response	Rationale
Energy Assets Networks Limited	No	<p>Provision of HH settlement data to Host LDSOs by Embedded LDSOs is governed by Schedule 19 'Portfolio Billing'. Embedded LDSOs are mandated to provide a monthly report to the Host LDSO by the 15th of the month based on the amounts invoiced to Suppliers. If Embedded LDSOs are perceived to be submitting the data late, the escalation route is via the DCUSA Contract Manager.</p> <p>Perceived delays in submitting data may be for valid reasons. We have experienced delays in receiving the D0036s from the appointed Data Collector to enable timely billing mainly following the initial energisation of the MSID in SMRS e.g. MSID energised in July 2023, D0036 data not received in time for August billing runs. EAN carry out pre-billing checks to identify energised MSIDs with 'missing' D0036s and escalate to the relevant Supplier. This may be the cause of the Proposer's perceived view of late submission of reports by Embedded LDSOs.</p>
National Grid Electricity Distribution	No	<p>Whilst we would support the principle of being able to receive HH data in a more timely manner to aid forecasting, we do not believe that the solution is fully formed. We currently only receive the D0036 into our Durabill system. We would not be supportive of receiving HH data for Embedded LDSO connected sites via the D0036 as this would result in the metering data being treated as invalid by the system and then retained in the table holding invalid and not yet validated data. This, over time, could affect the performance of our processing. In addition, whilst we would be able to view data for the embedded MPANs via the existing Invalid Meter Data Report, this report would return all data that is not valid for billing including all embedded MPAN data alongside data for our other host network connected MPANs with data issues.</p> <p>If this change for HH data for Embedded LDSOs is not to form part of any billing solution, an alternative solution would be for the Host DNO to receive the D0275 into a separate internal system to utilise the data for forecasting. However, this would involve putting additional processes in place to be able to analyse and draw on that data for forecasting purposes.</p> <p>Within MHHS both the D0036 and the D0275 will be replaced by the IF-021. It is not clear whether the IF-021 will accommodate the proposed solution within this CP and the ability for the DiP to send the IF-021 to a host DNO without further CPs or CRs having to be raised.</p>
UK Power Distribution	Yes	<p>We understand the point made by the DNO and see no reason to refuse them the extra visibility.</p>

Respondent	Response	Rationale
Last Mile Electricity	No	<p>Last Mile Electricity are unclear on whether there is a requirement for this CP. Under DCUSA Schedule 19 3.2 iDNOs are mandated that “The EDNO shall provide a report to the DNO Party, on or before the 15th day of each month, based on the amounts invoiced to Supplier / CVA Registrants by the EDNO pursuant to Clause 21 in respect of its Connected, including all relevant data not previously reported to the DNO Party (and any adjustments to data previously reported). Where revised data is received by the EDNO and rebilled, a credit row and new debit row shall be added and reported in the spreadsheet under Paragraph 3.4”.</p> <p>Last Mile consistently send the data under this obligation to all DNOs in a timely manner. Should an energisation status change be received late eg supply energised on 01/06/23, but D0205 updating the MPAN status to energised is not received until 15/08/23, then that MPAN would be back billed to the Supplier and equivalent data sent to the DNO as soon as possible on the next billing run.</p> <p>Last Mile occasionally also has to chase DCs for D0036 data to allow us to bill, and believe this would be the same for the DNOs in receiving the same data, hence remaining in the same situation as at present.</p>
SMS PLC	N/A	<p>We agree that embedded data needs to be received faster by the host DNO, however, as a HHDC and therefore the party most affected by this solution, we wonder what consideration was given to speeding up the process of sending the data between the Embedded DNO and the Host DNO.</p>
Stark	Yes	-

Question 2: Do you agree that the draft redlining delivers the CP1585 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	0	0	0

Responses

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

Respondent	Response	Rationale
Scottish Power	Yes	-
Npower Commercial Gas Limited	Yes	-
UK Power Networks	Yes	The drafting delivers the change as drafted.
IMServ Europe	Yes	-
Energy Assets Networks Limited	Yes	-
National Grid Electricity Distribution	Yes	Whilst the draft redlining delivers the CP1585 proposed solution, we do not agree with the proposed solution.
UK Power Distribution	Yes	-
Last Mile Electricity	Yes	Should the CP progress the draft redlining delivers the proposed solution.
SMS PLC	Yes	-
Stark	Yes	-

Question 3: Will CP1585 impact your organisation?

Summary

High	Medium	Low	None
1	5	3	1

Responses

Respondent	Response	Rationale
Scottish Power	Low	We will require to implement some IT change to support the change.
Npower Commercial Gas Limited	Medium	As a HHDC we will need to update our software to identify where there is a Host LDSO and to create additional mappings of Consumption Data flows. We will also need to test that implementing these changes does not affect any existing routing of flows and that any aggregation of Meter Points into flows only selects the correct meter points for the correct party.
UK Power Networks	Medium	Our system(s) will have to store more HH data. Internal routing systems will have to have certain validations removed (e.g. validation of which MPANs are ours). Certain systems, such as the DUoS billing system, will have to process the files to determine whether they should ignore them or process them. This may delay processing of the data files that are actually needed for billing.
IMServ Europe	High	IMServ would have to interrogate its entire portfolio of appointments each time before issuing the appropriate D275s to the appropriate Parties. Development would be required in this area to support this change.
Energy Assets Networks Limited	Medium	If implemented, there could also be a negative impact whereby the Host LDSO receives the D0036s before the Embedded LDSO for the same MPAN and raises Portfolio Billing invoices before the Embedded LDSO has raised an invoice themselves subsequently causing cashflow issues.

Respondent	Response	Rationale
National Grid Electricity Distribution	Low/Medium	<p>CP1585 will impact our organisation. If the HH data for embedded LDSO connected sites is sent via the D0036 this will, over time, negatively affect the performance of our Durabill system. In addition new reporting will be required to be able to identify data relating to Embedded LDSO connected sites within the existing Invalid Meter Data Report.</p> <p>If the D0275 is received into a separate internal system for forecasting purposes, new processes and systems changes would be required to analyse and draw on that data.</p> <p>If Durabill is to accommodate the load of IF-021s for embedded MPANs, this would also have an impact on our Service Provider to be able to deliver the changes required.</p>
UK Power Distribution	None	-
Last Mile Electricity	Low	<p>As there will be no changes to the way Last Mile receive the D0036 data this will have a low impact. However, should the data ever be used by the DNO to bill the EDNO Last Mile will have to monitor that we have also billed the supplier using the same data at the same time to ensure cash flows are not affected and result in an increase in the administration for iDNOs to manage the DUoS billing process. It is therefore proposed that any additional data gathered by the DNOs are only used for forecasting purposes and not billing of iDNOs.</p>
SMS PLC	Medium	<p>As a HHDC we will need to updated systems, processes, and documents to allow for CP1585. Due to the way our system currently works, we will be required to add additional flags and lookup data to ensure that we capture all of the relevant MPANs and issue the data to the relevant Host DNOs, both for current appointments and new-ins. Post implementation we will need to add additional query management from host DNO.</p>
Stark	Low	<p>Resource requirement to minor code adjustment. Dependent on whether list of Distributor Codes will be provided for look-up or if we are required to create this manually.</p>

Question 4: Will your organisation incur any costs in implementing CP1585?

Summary

High	Medium	Low	None
0	4	3	3

Responses

Respondent	Response	Rationale
Scottish Power	Low	Yes but this is anticipated to be low.
Npower Commercial Gas Limited	Medium	As a HHDC there will be development and testing costs associated with this change.
UK Power Networks	Medium	Data storage. System changes may be required to either process or prohibit the files.
IMServ Europe	Low	<p>There would be the following one off costs:</p> <ul style="list-style-type: none"> • Analysis • Development • Testing • Commercial activities • Training • Documentation • Implementation <p>Ongoing costs are likely to be restricted to DTN costs</p> <p>Although IMServ's costs to implement are modest, this is against a backdrop of other hugely significant change activities required to support MHHS.</p>
Energy Assets Networks Limited	None	-
National Grid Electricity Distribution	Low/Medium	<p>One off costs would be incurred if the HH data for embedded LSO connected sites is sent via the D0036 as new reporting will be required to be able to identify data Embedded LDSO connected sites within the existing Invalid Meter Data Report.</p> <p>If the D0275 is received into a separate internal system for forecasting purposes, costs will be incurred to set up new processes and systems changes would be required to analyse and draw on that data.</p> <p>If Durabill is to accommodate the load of IF-021s for embedded MPANs, this would also have an impact on our Service Provider to be able to deliver the changes required which incur additional charges.</p>

Respondent	Response	Rationale
UK Power Distribution	None	-
Last Mile Electricity	None	-
SMS PLC	Medium	<p>One-off costs – analyse, development and implementation of the system, process and document changes.</p> <p>On-going costs – increased DTN traffic and therefore charges, increased FTE to cover query management from Host DNO.</p>
Stark	Low	As per Q3

Question 5: Do you agree with the proposed implementation approach for CP1585?

Summary

Yes	No	Neutral/No Comment	Other
3	7	0	0

Responses

Respondent	Response	Rationale
Scottish Power	Yes	-
Npower Commercial Gas Limited	No	As stated above we believe that it would be better for this CP to be placed on Hold and requirements delivered through MHHS design
UK Power Networks	No	<p>There needs to be a concurrent DCUSA change. Meter data is owned by the supplier and the DC is merely their agent.</p> <p>DCUSA Clause 29.3 obliges the supplier to send metering data to the LDSO (the one that the MPAN is connected to). Clause 29.11 goes on to allow that LDSO to manipulate that data and pass it on to another LDSO. This is the mechanism that enables the submission of aggregated HH billing data from the embedded LDSO to the host LDSO (and was changed to facilitate this).</p> <p>There will need to be changes to these clauses to gain the relevant rights/permissions between the parties, as well as to the BSCP to describe the mechanism. It is not sufficient to change the mechanism only.</p>
IMServ Europe	No	-
Energy Assets Networks Limited	No	We do not agree that CP1585 should be implemented.
National Grid Electricity Distribution	No	We do not believe that this is a fully formed solution.
UK Power Distribution	Yes	-
Last Mile Electricity	Yes	Should this CP progress Last Mile agree with the proposed implementation approach.
SMS PLC	No	Due to an increased amount of development we are currently undertaking, our preference would be for a June 24 implementation date.
Stark	Yes	-

Question 6: Do you have any further comments on CP1585?

Summary

Yes	No
4	6

Responses

Respondent	Response	Comments
Scottish Power	No	-
Npower Commercial Gas Limited	No	-
UK Power Networks	Yes	<p>The consultation goes on to say that this HH data could be used in host LDSO's DUoS billing but that would also need DCUSA changes, not just the system changes that the consultation identifies.</p> <p>Such an idea would also require other standing data, that is not included with the HH data, to be provided in respect of each IDNO MPAN, assuming the current basis of DUoS charges, so other data flows or DIP messages may need to be adapted or introduced to enable that.</p>
IMServ Europe	Yes	<p>To support such an arrangement, IMServ would have to develop its Legacy HHDC system at a time where we are seeking to wind down this soon to be obsolete arrangement.</p> <p>IMServ's focus is now on MHHS and being ready for CIT/SIT testing while balancing this against its BAU activities. Making any changes to the current arrangements can only dilute IMServ's efforts and attention in other areas.</p> <p>Given HHDCs are expected to support this service, IMServ would expect to recover the cost of this service from Suppliers which further dilutes their efforts at this time.</p> <p>IMServ is unlikely to be able to deliver such a change while trying to support the transition to MHHS.</p>

Respondent	Response	Comments
Energy Assets Networks Limited	Yes	<p>As the HHDC may need to make functional changes to their IT systems to send D0036s to 2 recipients and incur costs as a result, EAN question the timing of the Proposal considering the current work progressing under the MHHS Programme - looking forward, the D0275 and D0036 are due to the discontinued.</p> <p>The Proposer also mentioned 'has spoken with Embedded LDSOs who were happy for this information to be sent to Host LDSOs [directly]'. EAN has not been contacted and speaking to other IDNOs, many have also not been contacted. We do not believe it is appropriate to make the comment that 'Embedded LDSOs were happy'.</p>
National Grid Electricity Distribution	No	-
UK Power Distribution	Yes	<p>We are satisfied that there has been no arguing for the 'DNO to IDNO billing procedure' (regulated by DCUSA) to change such that it remains based on the monthly report produced by the IDNO and sent to the DNO (the monthly report details what the IDNO has invoiced the supplier, and is used by the DNO to bill the IDNO). This is because there is a risk that they the DNOs do not have all the necessary information at hand to use the readings incorrectly and as a result bill us incorrectly (i.e. suppliers may have updated ECOES/MPAS incorrectly, etc....)</p>
Last Mile Electricity	No	-
SMS PLC	No	-
Stark	No	-

CP Redlined Text

No specific comments were received about the CP redlined text.

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