

CP Consultation Responses

CP1594 Creating an Approval Process for Managing New and Legacy Communication Types in Metering Systems

This CP Consultation was issued on 3 April 2024 with responses invited by 24 April 2024.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Npower Commercial Gas Limited	2	Supplier, Supplier Agent
SMS Plc	1	Supplier Agent: CVA MOA, SVA MOA, DC, DA (NHH/HH)
IMServ	1	Supplier Agent
Stark Software, Stark Connect, Stark Infra	2	Distributor, Supplier Agent: DC/DA, MOP
SSE Energy Supply Limited	1	Supplier
Siemens	1	Supplier Agent
Centrica	1	Supplier
ENGIE	1	Supplier
Scottish Power (Dataserve)	1	Supplier Agent: MEM

Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Npower Commercial Gas Limited	✓	✓	✓	✓
SMS Plc	✓	✓	✓	✓
IMServ	✓	-	-	✓
Stark Software, Stark Connect, Stark Infra	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✗	✓
Siemens	✓	✓	✓	✓
Centrica	✓	-	✗	✓
ENGIE	✓	-	✓	✓
Scottish Power (Dataserve)	✓	✓	✓	✓

Question 1: Do you agree with the CP1594 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
Npower Commercial Gas Limited	Yes	None Given
SMS Plc	Yes	None Given
IMServ	Yes	Being able to push for the replacement of expired comms methods will be essential in ensuring data completeness in the new MHHS world. Additionally, an easier way to add new comms methods will also be helpful
Stark Software, Stark Connect, Stark Infra	Yes	The proposal is suitable for the future simplification and improvement of current process. It may be expected that MOA should be aware of these changes however we can see the benefit of a managed, centralized process to facilitate the transparency of this information and encourage organisations to review and update current communication types in use.
SSE Energy Supply Limited	Yes	SSE welcomes the point of reference on the status of communications methods and views the proposal provides clarity to suppliers and MEMs of when they should cease installing respective communications devices. We would welcome confirmation that the communications method flow end date is the physical end date of the communications method and wonder whether the time period from the Communications Method Installation End Date should be greater than six months to avoid customer inconvenience.
Siemens	Yes	Yes, the necessity for a new process to clear down and remove redundant entries makes sense.
Centrica	Yes	None Given

ENGIE	Yes	This is a sensible change to remove redundant or misleading communication method descriptions from the existing data catalogue and permit understanding of the impact of sunsetting various communications technologies on consumers and market participants.
Scottish Power (Dataserve)	Yes	<p>We understand the rationale behind the process and what it is looking to achieve, in particular the transparency about the latest communication technologies that would be available.</p> <p>However, although the solution excludes the end-dating of PTSD/CSD communications methods, is this based on the assumption that these services will be fully redundant by the end of 2025 and not an available comms method? We believe that this the transition may not be fully achievable by 2025 due to the remote location of some metering; clarity still to be provided on the strategy of replacement communications methods by suppliers; the volume of 2G dependant Smart meters. This would result in the need for these communication methods to still be supported and not “switched off”(i.e. for customer emergency alarms, etc) and we suggest that these would still be supported. We would appreciate clarity on this position for the proposed solution.</p>

Question 2: Do you agree that the draft redlining delivers the CP1594 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

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

Respondent	Response	Rationale
Npower Commercial Gas Limited	Yes	None Given
SMS Plc	Yes	None Given
IMServ	Yes	None Given
Stark Software, Stark Connect, Stark Infra	Yes	Noting it will require a REC change post implementation, the BSCP 601 redlining appears to deliver the intention of CP1594.
SSE Energy Supply Limited	Yes	None Given
Siemens	Yes	The approach will meet the desired goals/aims of CP1594.
Centrica	Yes	None Given
ENGIE	None Given	We have not reviewed the drafting.
Scottish Power (Dataserve)	Yes	None Given

Question 3: Will CP1594 impact your organisation?

Summary

High	Medium	Low	None
0	3	4	2

Responses

Respondent	Response	Rationale
Npower Commercial Gas Limited	Medium	<p>As we operate HHDC & MOA functions, this change will be both pertinent and highly relevant to our day-to-day operations:</p> <p>In the case of MOA it will be important to ensure that sufficient notice of any comms method new & end dating of comms methods, this is both to ensure that sufficient time is provided to address any comms methods still in use & correct before they are no longer in use, but also to ensure that any interoperability issues that may arise due to new comms methods materialising can be worked through to assure that comms can be considered in our service offers.</p> <p>In the case HHDC this will matter around our communications infrastructure updates & maintenance, to ensure that conscious decisions can be taken regarding communications methods to be used.</p> <p>There is also the overarching supplier hub impact that feeds into this as it is of ever-increasing importance with both the BSC arrangements and supplier licence conditions, and most importantly customer journey that remote communications remain established once facilitated.</p>
SMS Plc	Medium	<p>As MOA and DC, a system updated would be required to relax the validation currently carried out on Communications Method Data Item J0386 on incoming D0268/D0313s. In addition, the new values will require storing in our MOA system for future use, with the requirement to add more values as and when they are approved.</p>
IMServ	None Given	<p>There will be changes needed to support new comms methods and meter replacement will be necessary in some cases when replacing obsolete</p>

		<p>meters, however that should be considered part of the ongoing evolution of the market. And will impact the industry not just individual organisations.</p> <p>This CP will facilitate those changes though and not have a direct impact itself as it is down to the individual parties to support new comms methods etc.</p>
Stark Software, Stark Connect, Stark Infra	Low	Stark currently have a business strategy that aligns with CP1594. As no data cleanse activity required on implementation impact will be minimal.
SSE Energy Supply Limited	Low	SSE feels the proposal will help us manage our agents to ensure compliant comms are fitted.
Siemens	Low	There will be the new process to cascade, no expected development or testing required.
Centrica	None Given	None Given
ENGIE	Low	Yes – we will need to upgrade our systems to enable processing of the impacted data flows. This would be achieved within the standard release cycle operated by our service providers.
Scottish Power (Dataserve)	Medium	As per response to Q1 – we would be impacted if we could not service PSTN/CSD metering post 2025.

Question 4: Will your organisation incur any costs in implementing CP1594?

Summary

High	Medium	Low	None
0	1	5	3

Responses

Respondent	Response	Rationale
Npower Commercial Gas Limited	Low	We do not envisage high costs associated with the implementation of this CP as the comms method data item is not necessarily changing in dataflows/. structures etc but would expect slight increases in cost to manage closure of existing comms methods to be terminated.
SMS Plc	Low	Development and testing costs covering the required system updates.
IMServ	None Given	<p>It is very difficult to put a direct cost on new comms methods as we do not know what they are in some cases.</p> <p>However there will be a cost for any meter that needs either full replacement or a comms swap, but that will not be directly caused by the implementation of this CP</p>
Stark Software, Stark Connect, Stark Infra	Low	Implementation aligns with Stark's business strategy however may require some internal process updates post implementation.
SSE Energy Supply Limited	None	None Given
Siemens	Low	Minimal cost for cascade new process.
Centrica	None	As the CP states that the intention is to set up the framework for managing outdated communication methods we do not believe that this change in of itself will impact us.
ENGIE	Low	Some costs in administering the change, training out the new dataflow specification to end users and reporting teams.
Scottish Power (Dataserve)	Medium	There will be a potential IT cost dependant on the level of change in the proposed REC change for the managing the J0386 data item. This will have to be impact assessed once the detail has been published.

Question 5: Do you agree with the proposed implementation approach for CP1594?

Summary

Yes	No	Neutral/No Comment	Other
9	0	0	0

Responses

Respondent	Response	Rationale
Npower Commercial Gas Limited	Yes	None Given
SMS Plc	Yes	None Given
IMServ	Yes	None Given
Stark Software, Stark Connect, Stark Infra	Yes	None Given
SSE Energy Supply Limited	Yes	The proposed start date should provide sufficient time to update the reference document and we can see no reason for a delay beyond this date.
Siemens	Yes	The approach will meet the desired goals/aims of CP1594.
Centrica	Yes	None Given
ENGIE	Yes	Given the impending nature of some of the communications switch offs, and the need to conduct data cleansing activity once CP1594 is in place in order to fully realise the benefits of the change, this change needs to be progressed with some urgency.
Scottish Power (Dataserve)	Yes	None Given

Question 6: Do you have any further comments on CP1594?

Summary

Yes	No1
8	1

Responses

Respondent	Response	Comments
Npower Commercial Gas Limited	Yes	<p>We do perceive that, in the event this CP is approved there is additional activities that Elexon/BSCco should undertake to ensure that industry has a better view of when comms methods are changing to better enable readiness for both technical advances in comms methods as well as those that are to be terminated, we suggest that Elexon should:</p> <p>Increase engagement with the telecommunications industry – as it stands, we perceive that is a gap that could mean that our industry is subject to changes that could significantly detriment settlement & wider industry needs for stable communications to be maintained simply by not having sight of developments of communications.</p> <p>Consider a “heads up” approach to communications, by using gained insights to knowledge share with our industry so that when new or to be ended comms methods are being considered impacted market roles can be pro-active & undertake preventative actions to minimize both settlement & wider impacts or benefits of improved or removed comms methods.</p> <p>Offer insights into Ofgem & government bodies – this would also ensure that when legalisation or licence conditions that are either imposed or being considered consider developments that are outside of market participants reasonable control when changing or implementing the market rules.</p> <p>In summary we are supportive of this CP and would urge Elexon/BSCco to consider this CP as a stepping stone to providing greater clarity and insights into what has been and will continue to be an ever-increasing expectation that as many meters as possible can</p>

		continue to benefit from remotely communicating metering systems.
SMS Plc	Yes	As an MOA, we agree with the need to easily add and then indicate the communication method of an outstation to all parties, both during our appointment and on Change of Meter Operator. We believe that this will give longevity to Metering Systems installed as Industry looks to replace those that are becoming obsolete.
IMServ	Yes	<p>You list the end date of CSD as the end of 2025 which has been reported by only one network.</p> <p>However this flies in the face to the OFCOM recommendations that 2G services (Which include CSD) should be available into the 2030s</p> <p>Could the comms industry position be clarified as to why some of them are ending CSD services early</p>
Stark Software, Stark Connect, Stark Infra	Yes	<p>Would there be a benefit to an RFI to help determine the number of MPANs currently on CSD and PSTN communication types?</p> <p>As manufacturers are part of the BSCP601 process, what will be the level of engagement to ensure their future participation in updating end-date information as it has been observed some of the communication types on the current list are no longer manufactured or supported.</p>
SSE Energy Supply Limited	Yes	<p>BSCP601 applies to Half Hourly metering only and we think it would benefit the industry if the communications register was extended to all relevant metering types.</p>
Siemens	Yes	<p>Page 1 of this document 'D - CP1594 CP Consultation Questions v1.0.docx' has a different method of sharing the consultation response than that outlined in page 5. Can Page 1 please state the email address to send the response to.</p>
Centrica	Yes	<p>Attachment C indicates there are separate end dates for "Communications Method Installation End Date" and "Communications Method Flow End Date" but CP1594 does not explain the different effect of these end dates; can that be clarified?</p>
ENGIE	Yes	<p>We see this as an enabling change which will need to be followed up by industry action plans to update communications methods across metering estates using the updated descriptors and identify cohorts of meters with common communication</p>

		methods, and their sunset dates. There could be a role for some central co-ordination of this effort either via Elexon on REC.
Scottish Power (Dataserve)	No	None Given

BSCP 601

Respondent	Location	Comment
Siemens	Page 23	The reference is CPXXX not CP1594, makes the review more difficult if different references are used to find the changes to be reviewed.
Siemens	Page 24	As above.