

Assessment Procedure Consultation Responses



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

P434 'Mandate to Half Hourly Settle the Non-Half Hourly Unmetered Supplies Metering Systems'

This Assessment Procedure Consultation was issued on 21 June 2022, with responses invited by 12 July 2022.

Consultation Respondents

Respondent	Role(s) Represented
TotalEnergies	Supplier
IMServ	Supplier Agent (HHDC/HHDA)
Northern Powergrid	Distributor
SUPPLIER A	Supplier
Scottish Power	Supplier, Supplier Agent (MOA)
Stark Software Int Ltd.	Supplier Agent (HHDC, HHDA, NHHDC, NHHDA)
Power Data Associates Ltd	Supplier Agent
SSE Energy Supply Limited	Supplier
British Gas	Supplier
Western Power Distribution	Distributor
Salient Systems Limited	Software Supplier
UK Power Networks	Distributor
Scottish Power Energy Networks	Distributor
Npower Commercial Gas Limited	Supplier, Supplier Agent
Tym Huckin Ltd	MA

P434
Assessment Consultation
Responses

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Version 1.0

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Question 1: Do you agree P434 will decrease the risks associated with transition to the MHHS TOM and to what extent will it decrease the risks?

Summary

Yes	No	Neutral/No Comment	Other
8	4	1	2

Responses

Respondent	Response	Rationale
TotalEnergies	No	There is also an element of this change being a distraction from delivering MHHS, the more changes introduced like this will take time and resources away from delivering MHHS properly. We only have limited skilled resources able to deliver a programme like MHHS (as Ofgem have said it's seen as the biggest change since 1998) and that limits our capability to do other things. As outlined in question 12 if our concerns are addressed then this change in the timescales set out does not present an insurmountable challenge.
IMServ	Yes	This is a proactive approach for business readiness.
Northern Powergrid	Yes	Yes, we agree as it will enable the UMS arrangements to be implemented in advance of the transition of the MHHS TOM reducing the burden on parties to deliver the MHHS TOM.
SUPPLIER A	Partly	<p>We agree that moving UMS Customers to Half Hourly Settlement will deliver various benefits, primarily that this will be an enabler to increase flexibility in the UK's electricity system and support a national transition to Net Zero, an aim that we support with our Company ambition. As such we are supportive of the intent of this proposal.</p> <p>Expediting the move to HH Settlement for UMS Customers ahead of the main MHHS Go-Live date will bring potential benefits in that we can focus on the transition of our UMS portfolio only, and potentially de-risk the wider MHHS Project. However, it will bring additional costs to SUPPLIER A as a Supplier, and also bring forward new costs for some of our Customers who will be impacted by this proposal, at a time when the cost of energy is particularly high.</p> <p>Given the above, we propose that P434 is approved an optional solution rather than mandatory, to allow</p>

Respondent	Response	Rationale
		us to move our UMS sites to HH earlier than Oct 24 if possible. We also would like to move the sites using Option 1 rather than Option 2, as it is a significantly cheaper option for us.
ScottishPower	No	ScottishPower does not agree with the implementation date of October 2023. This change should be implemented in line with MHHS programme 2024/25, by implementing this change earlier will result in additional costs and already limited resources being taken away from the programme for little or no benefit to the industry.
Stark Software Int Ltd.	Yes	We believe early migration could provide additional time for Suppliers and UMSO to address any issues that may arise, particularly customer or contractual relationships. Numbers of NHH UMS may not be high but contractual arrangements can become complicated.
Power Data Associates Ltd	Yes	The implementation of P434 ahead of the MHHS implementation date, means that any risks or issues that might arise resulting from the transition from NHH to HH, can be alleviated ahead of the commencement transition to MHHS TOM. Issues that could occur for example, include the carrying out of the CoMC, agent appointment issues (MA, Supplier or HHDC) or UMSOs being able to generate Inventories (and D0388 Flows for these). Given there will be time for any of that to be resolved, then when the MHHS transition commences those scenarios won't get in the way of that transition.
SSE Energy Supply Limited	No	We have yet to see the effort that will be required in moving from HH Settled unmetered supplies into the "Unmetered" segment of MHHS and so, as such, it is difficult to assess the effectiveness of moving NHH UMS to HH prior to MHHS migration. Implementing P434 will add both complexity and cost to the transfer of unmetered supplies to HH under MHHS.
British Gas	No	We believe proposals such as these should be progressed within the MHHS programme where all the impacts can be assessed together and should not be progressed as a separate modification. We disagree that these proposals will de-risk the main MHHS programme as these proposals may well divert Supplier resources required to support the main programme.

Respondent	Response	Rationale
Western Power Distribution	Yes & No.	Yes settlements will be more accurate when calculating HH over NHH, however Elexon MEM reporting for HH needs implementation, as well as MA's, DC's & Suppliers all processing the kWh totals to 3 decimal places. At present the MA will calculate to 3 decimal places, the DC to either 2 or 1 and typically the supplier will bill to 1 decimal place. All 3 parties need to record the usage to 3 decimal places for settlements and customer billing, at present the MHH will clear the NHH MEM issues and then create new ones in HH settlements.
Salient Systems Limited	Yes	
UK Power Networks	Yes	P434 is an industry considered approach that has nominated the transition method of least risk.
Scottish Power Energy Networks	Yes	There are large numbers of 'single site UMS' and data cleansing is required to ensure that these are in a sound state to transition for the target dates. A co-ordinated approach between parties is essential to the delivery of MHHS. To commence this early we believe is the only way to make the target dates.
Npower Commercial Gas Limited	Yes	Based on the current Target Operating Model (TOM) Design we do not believe that it will be possible to migrate NHH UMS MSIDs into the TOM prior to them becoming HH settled, as such the requirement to migrate UNHH UMS to HH settlement prior to the migrating to the MHHS TOM appears to be a necessity in order to de-risk this element of the MHHS transition.
Tym Huckin Ltd	No opinion	

Question 2: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P434 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
13	0	1	1

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	Yes	We would support the proposal that all new UMS MPANs are set up as HH from Oct 23.
ScottishPower	Yes	Yes, we agree there are no other potential alternatives.
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	Yes	
British Gas	N/A	Our preference would be Option 1 as this is a cleaner process and disconnecting the old MPAN reduces risk of duplication.
Western Power Distribution	Yes	
Salient Systems Limited	Yes	
UK Power Networks	Yes	
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	Yes	
Tym Huckin Ltd	Yes	

Question 3: What would be the total cost to your organisation if CoMC option 1 is used?

Summary

High	Medium	Low	None	Other
3	3	4	3	2

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	There are costs but we have not done an impact assessment yet.
IMServ	Low	<p>Low - Option 1 and 2 will have a similar cost to us as DC.</p> <p>Both options will require the processing and managing of flows into our system.</p> <p>It states that the old NHH MSIDs will be set to de-energised or set to zero EAC to be disconnected at a later stage. What will be the impact on the DC/supplier while the old MSID is kept open? Will the NHH DC occur unnecessary work/costs to process the zero EAC and send unnecessary D0019s? The closure of the old NHH MSID should be prompt.</p>
Northern Powergrid	Medium	
SUPPLIER A	Low	
ScottishPower	N/A	
Stark Software Int Ltd.	Medium	May add admin cost potentially.
Power Data Associates Ltd	None	The use of CoMC option 1 or 2, has no impact, cost or otherwise, on a Meter Administrator.
SSE Energy Supply Limited	Medium	We have not carried out a full analysis, but we believe the costs of necessary system and process changes are likely to be significant
British Gas	Low	
Western Power Distribution	Low	Option 1 would provide a cleaner solution as there would be a distinct break between the NHH and HH consumption. However this would involve additional cost to raise a new MPAN, notify the customer of the new MPAN details, change system records and the deletion of the NHH MPAN. We also believe this

Respondent	Response	Rationale
		would cause customer detriment in them having to receive the new HH MPAN and amending their records along with updating their records to delete the NHH MPAN.
Salient Systems Limited	None	
UK Power Networks	High	Labour costs in creating new MPANs and ensuring the transition from the old MPANs, which need to be end-dated, to the new MPAN which must have been registered, on a case by case basis.
Scottish Power Energy Networks	High	
Npower Commercial Gas Limited	High	<p>Appr. cost: £1Mn+</p> <p>We believe the existing UMS CoMC process if utilised would carry a high cost on the basis that we would be required to conduct the process largely through manual effort which would require additional FTE to be put in place to manage the process because of option 1 being manual by its nature.</p> <p>We believe that FTE would be required to engage with various stakeholders such as UMSO to confirm new MSID assignment assurance that all relevant information (e.g. certificates) has a transferred over to new MSIDs in order to mitigate the risk of information being lost due to movement of associated detail to MSIDs needing move from one MSID to another.</p> <p>We also perceive that customer impacts would be greater due to the requirement to put in place new contracts associated to the new MSIDs that would be created under option 1 so that onward registration and set up of a HH MSID can be completed.</p>
Tym Huckin Ltd	None	

Question 4: What would be the total cost to your organisation if CoMC option 2 is used?

Summary

High	Medium	Low	None	Other
3	3	5	3	1

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	There are costs but we have not done an impact assessment yet.
IMServ	Low	Low - Option 1 and 2 will have a similar cost to us as DC. Both options will require the processing and managing of flows into our system. This approach will be easier to handle as one NHH MSIDs contract will close and the HH MSIDs contract opens.
Northern Powergrid	Low	
SUPPLIER A	Medium	
Scottish Power	High	
Stark Software Int Ltd.	Low	Based on business-as-usual approach.
Power Data Associates Ltd	None	The use of CoMC option 1 or 2, has no impact, cost or otherwise, on a Meter Administrator
SSE Energy Supply Limited	Medium	We have not carried out a full analysis, but we believe the costs of necessary system and process changes are likely to be significant
British Gas	Low	
Western Power Distribution	Low	Option 2 to amend the CoMC process in BSCP520 to enable a NHH UMS MPAN to be changed to a HH UMS MPAN is a preferred option as it would remove the requirement to have to update systems with new MPAN details and would remove the requirement to involve the customer in amending their records and systems.
Salient Systems Limited	None	

Respondent	Response	Rationale
UK Power Networks	High	System costs alongside labour costs of cleansing data and end-dating surplus MPANs.
Scottish Power Energy Networks	High	
Npower Commercial Gas Limited	Medium	<p>Appr. cost: £500k-£1Mn</p> <p>We believe creating a UMS CoMC process would carry a medium cost on the basis that we would seek to develop systems to automate UMS CoMC due to retaining an existing registered UMS MSID which would reduce FTE requirements, as option 2 enables an ability for the move to HH settlement to be enhance systems and controls.</p> <p>It is also our belief that option 2 could also reduce the requirement for customer contracts to be cancelled and re-agreed on the basis that an existing UMS MSID would be retained for the transition to HH settlement itself.</p>
Tym Huckin Ltd	None	

Question 5: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P434?

Summary

Yes	No	Neutral/No Comment	Other
11	1	3	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	Yes	We have not identified any issues with the draft legal text.
Scottish Power	No	As above Q1
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	Yes	
British Gas	N/A	
Western Power Distribution	Yes	
Salient Systems Limited	N/A	
UK Power Networks	Yes	
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	Yes	No additional comments.
Tym Huckin Ltd	Yes	

Question 6: Do you agree with the Workgroup that the amendments to the Code Subsidiary Documents in Attachment A deliver the intention of P434?

Summary

Yes	No	Neutral/No Comment	Other
9	3	3	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	Yes	We have not identified any issues with the subsidiary documents.
Scottish Power	No	As above Q1
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes & No	<p>The changes that have been made I agree deliver the intention of P434. However, there are further changes that would need to be applied.</p> <p>OID:</p> <ol style="list-style-type: none"> section 1.4 explains the difference between HH and NHH trading, and will require an update section 1.4.2 details that in order to trade HH a MA must be appointed, by the Supplier and contracted by the Customer. This last part (MA contracted by the Customer) will not apply in all scenarios now under this mandate – as the MA just needs to be appointed by the Supplier (who may agree commercial terms direct with the MA). <p>BSCP520:</p> <ol style="list-style-type: none"> 3.1.15 & 3.2.5 – the amendment made to section 3.1.15, adding the words “where appropriate”, also needs to be entered in section 3.2.5. The Inventory being provided to the MA can occur for a new appointment

Respondent	Response	Rationale
		<p>(covered by section 3.1.15), and for normal ongoing updates to an inventory (covered by section 3.2.5).</p> <p>2. 3.6.2.2 – UMSO confirming the CoMC date to the Supplier and MA – the MA will not (I believe) have been appointed by the Supplier at this stage – so both the MA requires that appointment notification and to have accepted it, and the Supplier needs to advise the UMSO who the MA is prior to this stage occurring.</p> <p>3. 3.6.2.2 – also around this stage, the new HHDC, who will need to be appointed by the Supplier, will need to receive their appointment on the D0155 from the Supplier too, and a D0148 from the Supplier to advise them who the MA is. The MA will also require the D0155 appointment Flow and D0148 to advise who the HHDC is – or equivalent to these Flows depending on how MA appointments are agreed to be managed.</p> <p>BSCP502:</p> <p>1. 3.4.1.2 – the use of the D0036 “OR” D0380 – the word OR may need consideration, and the continued permission to use D0036 will need consideration – depending on the decision made on this (based on Question 18 in this Consultation).</p>
SSE Energy Supply Limited	N/A	We have not reviewed the Code Subsidiary Documents.
British Gas	N/A	
Western Power Distribution	Yes	
Salient Systems Limited	Yes	With regard to BSCP502
UK Power Networks	Yes	
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	No	The proposed red line changes in BSCP 520 for the CoMC process appears to prescribe the process under Option 1, as step 3.1.10 refers to issuing a D0055 to register as MSID. As the retained MSID

Respondent	Response	Rationale
		<p>will already be registered to a supplier that would not be a requirement under Option 2.</p> <p>As a general point we would recommend that the CoMC process under Option 2 is drafted as a standalone procedure within BSCP520 by removing step 3.6.2.5 and referencing the process steps so that it is clear within the BSCP that option 2 is to be utilised should that be the preferred the solution option to take forward.</p>
Tym Huckin Ltd	Yes	

Question 7: How much will it cost your organisation to implement P434?

Summary

High	Medium	Low	None	Other
3	2	6	1	3

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	There are costs but we have not done an impact assessment yet.
IMServ	Low	Low – There will be a cost in managing the implementation. It will require development to change the process to send a D0380. There will be a need for reporting, creating new work instructions and training. There may be additional DTN flow costs due to the volume of flows migrating across markets and the increased volume of D0379 flows received. The cost is not dependant on this being part of or outside of a normal BSC Systems release.
Northern Powergrid	Low	
SUPPLIER A	Low	
Scottish Power	High	
Stark Software Int Ltd.	Med/Low	Depends on the options. Opt 1 would be med cost; Opt 2 would be low cost.
Power Data Associates Ltd	N/A	<p>One off costs will be incurred to make changes to the Equivalent Meter and our IT Hardware and infrastructure - given the increase in MSIDs being managed. Arranging commercial arrangements with Suppliers as part of this change will incur costs for staff to implement and organise. Changes will be made to our operational procedures and quality systems too.</p> <p>Testing will be carried out ahead of the implementation date to our IT infrastructure to manage the increase in volume of data.</p> <p>Costs of the time and effort in liaising with some or all the UMSOs and Suppliers around appointment activities.</p>

Respondent	Response	Rationale
		<p>There will be no difference to costs whether this is implemented as part of or outside of a BSC Systems Release.</p> <p>Any decisions on which CoMC option taken also make no impact on the costs to us in our Meter Administrator role – but we understand that this decision would have a bearing on Supplier and UMSO time and costs.</p>
SSE Energy Supply Limited	Medium	We have not carried out a full analysis, but we believe the costs of necessary system and process changes are likely to be significant
British Gas	Low	
Western Power Distribution	Low	<p>As the CoMC will be driven by the Supplier, we believe that the costs to WPD to implement Option 2 will be in the Low category to migrate NHH UMS MPANs to HH. There will be costs incurred for data cleansing and migrating the data.</p> <p>If Option 1 is implemented there will be additional costs to migrate data from our existing systems into new records and raising and allocating MPANs and notifying customers.</p>
Salient Systems Limited	Low	Minor changes to configure D0379 D0380 to supplier for UMS.
UK Power Networks	High	As above, system costs and labour costs for data cleanse/transition management.
Scottish Power Energy Networks	High	
Npower Commercial Gas Limited	Medium	<p>Appr. cost: £500k-£1Mn</p> <p>Under both options we believe that the changes required would be of a project size, with some variant in costs based on whether we would be required to use large increase in FTE to manually process NHH-HH CoMC under option 1 or system enhancement to automate the CoMC process under option 2.</p> <p>Under both options we perceive that we would need to upskill and increase FTE to facilitate the CoMC process, manage external engagement with industry parties and customer expectations over the migration window (EG MAs, UMSOs etc) and also manage additional closure process, such as logical disconnections of redundant NHH MSID's.</p>

Respondent	Response	Rationale
Tym Huckin Ltd	None	

Question 8: What will the ongoing cost of P434 be to your organisation?

Summary

High	Medium	Low	None	Other
0	0	7	4	4

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	There are costs but we have not done an impact assessment yet.
IMServ	Low	<p>Low – There will be an increase in the volume of flows being received, processed and sent by the HHDC and HHDA in comparison to the NHHDC service. For the NHH Unmetering the D0019 is triggered by the D0052. The frequency is low. For HHDC the D0379 is expected for each Settlement Calendar Day for an energised meter. Missing data will be identified, estimated and reported on. The D0036/D0380 must be sent as per the Settlement Calendar. The HHDA must then process these additional flows. There is a likely to be some volume of D0235s being created and sent back by the HHDA. This will have a cost in DTN usage, processing, reporting and working exceptions.</p> <p>HH Unmetering rarely changes energisation status and is handled manually. The consultation suggests that this is a more regular event in NHH. There will be a cost to manually/automatically handle these changes. Please see question 17 for more details.</p>
Northern Powergrid	None	<p>We do not envisage any increased operational cost as a result of P434.</p> <p>We are, however, keen to understand whether UMSO's will be required to maintain their own PECU array (which will be discussed at a UMSUG working group) which if required, will see an increase to our costs.</p>
SUPPLIER A	Low	There is likely to be a small increase in costs due to increased use of DTN.
Scottish Power	N/A	The ongoing cost to ScottishPower to implement P434 is currently quite difficult to quantify. A full impact assessment would be required to approximate this figure however due to current

Respondent	Response	Rationale
		volume of Industry Changes being resourced we are not in a position to carry this out during the time period of this consultation.
Stark Software Int Ltd.	Low	Mainly would be the additional cost from the DTN file transfer.
Power Data Associates Ltd	N/A	<p>Ongoing costs will include for staff to manage the increased operation of the Equivalent Meter and our requirements as a Meter Administrator for an increased number of MSIDs than under existing arrangements. Also increased DTN charges both through inventories received and being replied to, and increased volume of consumption data.</p> <p>Staff time in managing new commercial relationships with other agents than previously required – with the Suppliers.</p> <p>There will be no difference to costs whether this is implemented as part of or outside of a BSC Systems Release or around either CoMC option.</p>
SSE Energy Supply Limited	None	We do not believe there would be any ongoing costs once implemented.
British Gas	N/A	Potential UMSDS costs could be high in comparison to overall consumption allocated to the MPAN.
Western Power Distribution	Low	Once the migration of the NHH UMS MPANs has been migrated to HH UMS the ongoing costs with either option will be minimal.
Salient Systems Limited	None	
UK Power Networks	Low	Management of HH portfolios slightly more intensive than NHH.
Scottish Power Energy Networks	Low	We do not envisage that there will be significant ongoing costs related to P434.
Npower Commercial Gas Limited	Low	<p>Appr. cost: £100k</p> <p>We believe that ongoing costs uplifts associated to managing HH UMS settlement will be low, primarily the cost will come in the form of enhanced funding of and management of the MA/UMSDS role within the supplier hub and associated HH related exceptions.</p>
Tym Huckin Ltd	None	

Question 9: Will your organisation incur additional costs as a result of P434 that you would not have incurred under MHHS? Alternatively, would there be any cost savings from migrating NHH UMS Metering Systems before the MHHS migration?

Summary

Yes	No	Neutral/No Comment	Other
5	5	1	4

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	We do have a concern it will distract resources from delivering MHHS, but in terms of costs we have not done an impact assessment yet.
IMServ	N/A	Unclear
Northern Powergrid	No	N/A
SUPPLIER A	Q1 – Yes Q2 - No	<p>Yes, SUPPLIER A will incur significant costs undertaking P434 separately to MHHS. There will be no cost savings as a result of migrating early.</p> <p>It is our very strong preference that if you wish to proceed with Option 2, that this is brought in at the same time as the wider MHHS Project. This would allow us to wrap the significant development costs for this change into the wider Project and resource effectively, creating a much lower impact and risk to the rest of our change pipeline as we could benefit from Project efficiencies and economies of scale.</p> <p>With Option 1, whilst our expected costs are lower, the overall costs involved in flow changes and data cleanse would be higher than if these were wrapped up into the wider MHHS work. However, having the opportunity to engage with P434 before the wider MHHS transition does bring some de-risking.</p> <p>The number of UMS sites we supply is low compared to the overall volume of NHH meters we have, but focussing on UMS only when the MHHS mechanisms are not in place requires additional effort and resource, and will actually place the Customer in a worse-off position.</p>
Scottish Power	Yes	As above Q4

Respondent	Response	Rationale
Stark Software Int Ltd.	Not sure	It's difficult to confirm at this stage.
Power Data Associates Ltd	Yes	<p>The answer could be yes or no here. A flawless move from current arrangements straight into MHHS would cost less than having to work through 2 sets of migrations. But that approach, flawless or not, would have increased risk which if issues arose may have turn more difficult and costly to resolve in a shorter timescale and in combination with other MHHS activity.</p> <p>Certainly, having to provide consumption data through the DTN to the HHDCs under P434 will increase DTN charges (though significantly less cost impact than system development costs), and this data won't be sent via the DTN under MHHS so will go away – or move elsewhere.</p> <p>Costs will therefore undoubtedly be greater overall as a result of P434, but may also in part be offset by commercial arrangements resulting from an increased number of MSIDs being the responsibility of the MA.</p>
SSE Energy Supply Limited	Yes	The potential impact on Suppliers' systems is huge. We would need to carry out system changes to enable us to action CoMC, and these changes may only be for up to a year when we would be required to carry out further system changes to migrate to MHHS under the TOM
British Gas	Yes	Potential additional costs of UMSDS costs incurred earlier than if left to main migration
Western Power Distribution	N/A	Without a full understanding of the Design of MHHS which is still being developed, we do not feel in a position to be able to provide a response.
Salient Systems Limited	No	
UK Power Networks	Unlikely	P434 brings forward the move to HH and so a large part is timing. We cannot know whether the "how" is different under P434 as compared to how it might otherwise have been delivered.
Scottish Power Energy Networks	No	We have not identified any cost that would not have been incurred under MHHS, neither have we identified any cost saving from starting this work out earlier.

Respondent	Response	Rationale
Npower Commercial Gas Limited	No	We believe that costs incurred would have come to light under the MHHS programme of work in the absence of P434, therefore we do not perceive that additional costs over and above that expected under MHHS
Tym Huckin Ltd	No	

Question 10: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
12	1	2	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	Yes	We have not identified any issues with the assessment.
Scottish Power	Yes	
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	No	I don't believe there is an increase in the BSC Settlement Risk for Unmetered from this change – my view if this risk position remains neutral. There are risks to settlement whether a MSID is traded NHH or HH, as shown in the potential causes list of 011 SVA Risk. Whilst some potential causes may increase from this change, others will decrease – hence the overall UMS risk remains the same from my point of view. I accept the statement that overall risk to settlement remains low owing to Unmetered being a low percentage volume of the overall market.
SSE Energy Supply Limited	Yes	
British Gas	Yes	
Western Power Distribution	Yes	
Salient Systems Limited	Yes	
UK Power Networks	Yes	

Respondent	Response	Rationale
Scottish Power Energy Networks	Yes	SPEN agree with the Workgroup's assessment of the impact on the BSC Settlement Risk.
Npower Commercial Gas Limited	Yes	No additional comments.
Tym Huckin Ltd	No opinion	

Question 11: Do you agree with the Workgroup's assessment that P434 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
13	0	2	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	Yes	We have not identified any impacts.
Scottish Power	Yes	
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	Yes	
British Gas	Yes	
Western Power Distribution	Yes	
Salient Systems Limited	Yes	
UK Power Networks	Yes	
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	Yes	No additional comments.
Tym Huckin Ltd	No opinion	

Question 12: Will P434 impact your organisation?

Summary

High	Medium	Low	None	Other
3	5	3	1	3

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	<p>We are responding to this consultation with two areas of concern that we would like to be addressed:</p> <ol style="list-style-type: none"> 1. Customer engagement and getting their agreement to move to MHHS and appoint a Meter Administrator. 2. There are costs and time/distraction impacts from delivering MHHS, which would be better served by a later delivery. <p>These areas of concern are not insurmountable, but are not ideal.</p>
IMServ	Yes	<p>It will require development to change the process to send 3 decimal places to the HHDA and supplier. There may be contractual changes where it has become optional to offer two services, 1 decimal or 3. There will be implementation costs. There will be on-going cost listed under Question 8. There may be additional development and on-going costs depending on the handling of energisations, see question 17 for more detail. There will be a need for reporting, creating new working instructions and training.</p>
Northern Powergrid	Medium	<p>As an UMISO will be required to complete data cleanse activity including liaison with customers and suppliers and complete the CoMC activity. Our unmetered supplies system will need an upgrade including User Acceptance Testing (UAT) and interface testing with internal systems. Processes and documentation will need to be reviewed and updated and training delivered to operational teams.</p>
SUPPLIER A	Medium	<p>Yes.</p> <p>P434 will have a number of impacts on our organisation, such as:</p>

Respondent	Response	Rationale
		<ul style="list-style-type: none"> • Bringing forward the effort required to identify and conduct CoMC activity for eligible UMS sites • Bringing forward the effort required to engage with Customers and agree a new contract to reflect HH settlement • Bringing forward the need to agree relationships with MAs and update our systems to be able to pass through these costs where appropriate • Likelihood of additional complaints from Customers due to higher charges. In some instances we may need to break current NHH contracts early and sign new HH contracts, which may have higher energy prices due to the rise in energy costs, and will certainly have higher agent charges (Customer may or may not have a direct contract with MA). HH agent charges are higher than NHH agents due to the increased costs for processing HH data. • IT change effort required to ensure that our systems support Customers who have not signed a direct contract with the MA, and to ensure we have an automated CoMC process that can support UMS, which will only be used for this period of migration and will then no longer be required. • Data cleanse activities are likely to involve a mixture of reporting and manual effort – it is expected there will be quality issues with the data we can source via reporting, and will therefore be manual intervention required to complete the data sets. We would also need to agree data definitions for each data item (see Q19). • Multiple system changes to ensure we treat flows with three decimal places appropriately and can receive and store the information contained in D0379 & D0380. • Requirement for a dedicated Lead to manage the transition of UMS within SUPPLIER A, and cross-departmental resources to engage with the transition, providing data, undertaking manual activities and tailored reporting to ensure success.

Respondent	Response	Rationale
		We recognise that Option 1 is a significantly lower-cost solution for us as Supplier, and also results in system change that can be utilised on an ongoing basis. Option 2 requires more significant investment and customisation of our IT systems, and this functionality will not be utilised post MHHS go-live.
Scottish Power	High	Due to the volume of current industry changes with limited resources to complete the current milestone dates, we would not be in a position to resource this activity.
Stark Software Int Ltd.	Low	Currently the volume of UMS MPANs in NHH isn't that high.
Power Data Associates Ltd	High	<p>Between approval and implementation:</p> <ol style="list-style-type: none"> 1. Test and if necessary, enhance existing IT infrastructure to ensure the increase in MSIDs and therefore associated data can be handled 2. Arrange new commercial model to contract with Suppliers directly 3. Update Equivalent Meter software to manage whichever appointment process is decided upon 4. Equivalent Meter enhancements around increase volume of activity. 5. Document and update operational procedures <p>The workgroup proposal on bulk appointments will impact the activity we undertake – but whether existing DTN flows are used, or a process of communication outside of the DTN (e.g. spreadsheet and email), both would require amendments to software to incorporate this. To clarify, none of this is seen as any concern.</p>
SSE Energy Supply Limited	N/A	In addition to the cost impacts detailed above, there is the potential for customer dissatisfaction as their costs will increase due to the introduction of HHDC and Meter Administrator charges. This change could also make it difficult for consumers to change supply until MHHS is implemented as suppliers are unlikely to want to take on small HH unmetered supplies
British Gas	Low	
Western Power Distribution	Medium	

Respondent	Response	Rationale
Salient Systems Limited	Low	
UK Power Networks	High	The required Data Cleanse will likely be very labour intensive and there remains a risk to the transition time table. The CoMC process may require changes to our UMSO system to facilitate.
Scottish Power Energy Networks	Medium	Changes will be required to our UMS system (the cost of this is yet unknown). In addition to this there will be changes to internal documentation and training to be rolled out to field and office staff to support the changes.
Npower Commercial Gas Limited	Medium	As stated in response to Q7 we perceive that to deliver P434's intent we would have a project sized deliverable, with the main variant being either manual effort under option 1 with more FTE or system development and less increased FTE. In addition we would also need to procure Meter Administrator services and manage on an ongoing basis, as well as further enhancements to systems requirement in order to potentially change the use of existing HH consumption Dataflows (in use in todays HH UMS space) from a single to 3 decimal places.
Tym Huckin Ltd	None	

Question 13: Do you agree with the Workgroup's assessment of the impact on the consumer benefit areas?

Summary

Yes	No	Neutral/No Comment	Other
10	3	2	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	<p>We were party to the working group and agree with the assessment.</p> <p>The benefits for society as a whole; 'cleansing activities and getting more accurate inventories' will require co-operation from Customers and it would be useful to consider the use of standard communication templates so that customers receive a clear and consistent message from Suppliers and UMSOs.</p>
SUPPLIER A	No	<p>No. We believe that Customer bills will actually rise as a result. In some circumstances we may need to break the current NHH contract and agree a new HH contract with the Customer, which may be at a higher energy cost due to the rise in energy prices.</p> <p>Even if this is not required, the HH agent charges are higher than NHH charges so Customers will be paying higher costs.</p> <p>This will create dissatisfaction from Customers and provide a negative impact on their experience of the Electricity Industry, in a time of UK recession and an energy crisis. It may make them less likely to engage with the benefits associated with HH, such as more complex TOU tariffs (most of our UMS customers also have a range of NHH and HH meters that are also in their portfolio).</p> <p>With regards to the improved quality of service, we believe this is not the case for UMS Customers. The majority of our UMS sites are festive lighting and street lighting, where they will not benefit from TOU tariffs as the opportunity to change behaviour is very limited, if it exists at all. For our Customers, their UMS sites are a very small proportion of their</p>

Respondent	Response	Rationale
		<p>overall sites, and so it is unlikely they would make these sites an area of focus for cost savings.</p> <p>We do not believe that moving UMS HH earlier will bring any benefit to the end Customer, and we believe there will actually be an overall negative impact.</p>
Scottish Power	Yes	
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	No	<p>Yes on most points, but on point 2, whilst agreeing that bills will be more accurate and that that will be offset by the MA and HHDC costs – this offsetting isn't an accurate statement in my view. Purely based on kWh consumption values, some customers are going to find they get lower consumption, and others higher, and some exactly the same. Some customers depending on the time of use of consumption, will see an impact in DUoS costs, some increased, some decreased, resulting from changing from the current smearing of consumption that occurs in current NHH arrangements, vs the profiled (and more accurate) HH data.</p> <p>Yes, MA and HHDC costs will apply now, any NHHDC costs will be removed though – but the impact of these agent costs will not offset changes to the bill to a point of neutrality, we're going to see a range of 'winners' and 'losers' from these changes, but in all cases will provide more accurate data reflecting actual usage.</p> <p>I also do not support the comment about which party will inform customers what their consumption is. I agree this was said and raised in the workgroup – but the customer will be provided with their consumption totals on their bill from the Supplier. Whilst HH customers now all have a customer direct contractual arrangement with a MA, who will tell the customer what their consumption is – this is an added value service being paid for by the customer, an option which remains available to them after transition, should any customer or supplier choose to seek that commercial relationship. The provision of the EAC today for NHH on the Certificate does not provide the customer with an exact kWh value for each month to validate their bill against as NHH kWh monthly</p>

Respondent	Response	Rationale
		billing is worked out in different ways by different Suppliers today (albeit I appreciate it does give the customer a ballpark figure to work from).
SSE Energy Supply Limited	No	Whilst we largely agree with the areas identified as beneficial to the consumer, these benefits are realised by MHHS transition to HH, not by carrying out the change a year early. This particular group of customers has traditionally struggled to find suppliers (Elxon raised an RFI in February this year in order to identify Suppliers who were willing to take them on). Adding to the complexity of settling these supplies HH for a short period of time would make matters worse. In addition, changing these supplies to HH ahead of MHHS means they will attract both HHDC and Meter Administrator charges (after MHHS only UMSDS charges would apply). This could have a large impact on the cost to consumers as a lot of these supplies have very low consumption.
British Gas	N/A	Some unanswered questions regarding provision of data to consumers which will sit within the programme. Another example of why modifications of this nature should be progressed within the programme rather than outside of it.
Western Power Distribution	Yes	
Salient Systems Limited	Yes	
UK Power Networks	Yes	Improved consumption reporting and billing accuracy
Scottish Power Energy Networks	Yes	SPEN agree in principle with the Workgroup's assessment, however due to the make-up of our portfolio we have large numbers of low consuming UMS customers. We do not envisage that for these customers, the cost would be neutral, as the cost of the MA is likely to be significant in relation to their current charges. We however accept the point that overall, the position may be neutral across all portfolios and customer types.
Npower Commercial Gas Limited	Yes	No additional comments.
Tym Huckin Ltd	Yes	As discussed in the Workgroups

Question 14: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
10	4	1	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	No	<p>We do not believe that this is a suitable Implementation Date for the CoMC process.</p> <p>We believe the implementation date for CoMC will bring additional costs in earlier for Customers, and that there are no benefits to settling UMS HH early.</p> <p>However, we do recognise there are some de-risking benefits in being able to transition UMS to HH earlier. Therefore, we would recommend this is an optional approach, and that if market participants are able to transition early then it should be possible but not mandated. This will allow us to decide as we get closer to the deadline about how best to approach this within our business, weighing up the various factors and views of impacted departments.</p>
Scottish Power	No	ScottishPower does not agree with the implementation date of October 2023. This change should be implemented in line with MHHS programme 2024/25, by implementing this change earlier will result in additional costs and already limited resources being taken away from the programme for little or no benefit to the industry.
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	Yes	

Respondent	Response	Rationale
British Gas	No	We do not think that P434 should be implemented and therefore cannot agree with the recommended Implementation date.
Western Power Distribution	No	No we do not agree with the implementation date. Whilst we understand the desire to keep within the timelines of the MHHS schedule, we believe that the amount of cleansing work, resolution of exceptions and updates to systems will make the proposed implementation date challenging.
Salient Systems Limited	Yes	
UK Power Networks	Yes	Alternative timeline approaches were considered but the panel not in favour of any other time line approach discussed.
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	Yes	Whilst we perceive that the current timeline for the modification decision making may creep into October 2022, which is currently pencilled in as planning and agreement window between industry parties we feel that leaves sufficient time to enact those activities in the proviso that Ofgem's final decision announcement is not prolonged into the winter months.
Tym Huckin Ltd	Yes	

Question 15: How long (from the point of approval) would you need to implement P434?

Summary

0-6 months	6-12 months	>12 months	Other
6	1	0	8

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	6 months	6 months - It will require development to change the process to send a D0380.
Northern Powergrid	6 months – 18 months	<p>It is difficult to quantify the lead time for the data cleanse activity as it requires engagement from Customers and Suppliers. We will of course attempt to cleanse all records but those that can't be cleansed will be migrated with the current inventory data i.e. we will cleanse throughout the time we have available to us and have already initiated cleansed activity.</p> <p>CoMC option 1 requires a high level of manual input from the UMSO and reliance on other parties and will therefore require longer leads times than CoMC option 2. Again, it is difficult to quantify but we believe it could take up to 18 months.</p> <p>CoMC option 2 is less manually intensive for the UMSO than CoMC option 1 but still requires input from other parties and is difficult to quantify but we believe it could take up to 6 months.</p>
SUPPLIER A	6 months	Extensive system change is required, with associated cost and effort, which would require no less than 6 months to coordinate from the point of approval.
Scottish Power	In line with MHHS 2024/25	As above Q14
Stark Software Int Ltd.	1 month	
Power Data Associates Ltd	N/A	The change being implemented outside a normal BSC Systems Release has no impact on our role, and around how long we would need to implement

Respondent	Response	Rationale
		<p>P434. The timescales are clear and provided far enough in advance to work to.</p> <p>As much Lead Time as possible would be welcomed as work can commence as soon as this proposal is approved, but no specific Lead Time can be noted here as what we have is sufficient. Activities we need to undertake are covered in answers to Questions 7 & 12.</p>
SSE Energy Supply Limited	N/A	We do not yet know.
British Gas	6 months	As a minimum we require 6 months lead time from the date of approval to ensure any system changes required can be assessed and implemented.
Western Power Distribution	N/A	
Salient Systems Limited	3 months	
UK Power Networks	12 months	12 months to change systems and processes and test those.
Scottish Power Energy Networks	N/A	We are able to commence with the timeline to commence MHHS UMS for new connections in October 2023, and to support data cleansing ahead of the October 2024 deadline. We have system dependence on the October 2024 delivery date.
Npower Commercial Gas Limited	N/A	We are comfortable with the implementation timeframe of D+5 post of Ofgem's final decision and the proposed timelines to plan and prepare the movement of our NHH portfolio based on the transitional timetable.
Tym Huckin Ltd	Immediate	

Question 16: What is the best mechanism for bulk appointments?
Would the benefits of using the DTN outweigh the costs?

Summary

Yes	No	Neutral/No Comment	Other
7	2	6	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	Due to the volume this seem a sensible approach. The DTN is a secure way to send data in bulk and it is easy to audit.
Northern Powergrid	N/A	We believe the question relates to Suppliers and MAs as impacted parties.
SUPPLIER A	Yes	Using the DTN would create additional cost from increased traffic going through this system, however the cost is likely to be a worthwhile investment compared to an alternative manual solution. Full technical specifications would need to be defined and reviewed in order to accurately assess the cost of change.
Scottish Power	N/A	
Stark Software Int Ltd.	Yes	It should reduce the admin work and risk of missing UMS related files.
Power Data Associates Ltd	Yes	<p>To date, Suppliers can, and many do provide us as the Meter Administrator with the D0155 Appointment Flow – sent over the DTN. Suppliers also provide the D0148 over the DTN to advise us who the HH Data Collector they have appointed is. However – some Suppliers do not do this over the DTN, some citing historical system design issues whereby they don't recognise the Meter Administrator Role, other smaller Suppliers or those with very few UMS MSIDs often don't understand the Unmetered role correctly either and struggle to use the DTN for this. However, in recent months, the use of the DTN has become much more frequent for this activity between Supplier and MA.</p> <p>With all Suppliers, to support those who struggle with providing us DTN Flows, we as MA also accept an email communication with the same detail</p>

Respondent	Response	Rationale
		<p>provided. Some form of notification from the Supplier is required for audit purposes of our appointment and this is sufficient.</p> <p>The volume of MA Appointments, either to a new MSID, or occurring as a result of a change of MA, is very low each year – other than a minor spike caused by the enforcement of the 100kW rule recently – on average this is less than 10 per year. Clearly this will change because of this mandate. Change of Supplier is the most common reason for new MA appointments being needed today – as the new Supplier needs to appoint the MA when this occurs. But again, the volume of this activity is low. Therefore, we manage Appointment updates in our system manually, rather than automating these Appointments. This manual process cannot continue with the volume of MSIDs that will be traded HH as a result of this mandate.</p> <p>My view, is that the need to 'force' Suppliers to use DTN flows to manage appointments would mean for some, more significant system changes would be needed. Given under MHHS the process for appointments will be carried out via the DIP – this would be a change used for such a short space of time, until MHHS migration begins. I therefore do not support the need to mandate the use of the DTN Flows. I believe it should be between the Supplier & MA (for appointment, de-appointing and/or giving the HHDC details to the MA), and Supplier & HHDC (for appointing, de-appointing and providing HHDC the MA details), and Supplier & NHHDC (for de-appointing) how they manage this between each other.</p> <p>From our perspective as MA, given we will be entering into commercial arrangements with Suppliers, we can agree as part of that the mechanism for how appointments will be managed. I therefore do not believe any change is needed to the current requirements on this process.</p> <p>I want to add, because I don't think this has been expressed in completeness in the consultation documentation – that whilst the MA role is not named in the EMAR, it is clearly stated in the BSCP that for HH UMS, the MA is appointed in the position of the Meter Operator. Therefore, no changes are needed to the EMAR, or DTN to allow the MA to be appointed using the DTN Flows – and again even if it were, given the MA role will go away under MHHS</p>

Respondent	Response	Rationale
		any changes at that level would be short-term again and not cost effective.
SSE Energy Supply Limited	N/A	We have not yet arrived at a decision on this.
British Gas	No	We would prefer these to be handled within the DTN however accept that Suppliers costs to implement this, may outweigh the benefits
Western Power Distribution	Yes	We believe that the DTN would be the most appropriate method to facilitate the mechanism for bulk appointments
Salient Systems Limited	N/A	
UK Power Networks	N/A	Unknown
Scottish Power Energy Networks	Yes	While we have no interaction with these flows it would seem beneficial to utilise the DTN, as the alternative would appear to include manual processes that may be prone to manual error.
Npower Commercial Gas Limited	Yes	<p>We are supportive of the use of DTN to appoint Meter Administrators under P434 because of the volume of MSID's to move into HH settlement under either option will be in thousands, as opposed to a few hundred in the existing HH UMS market today.</p> <p>We perceive that the cause of HHDCs not knowing who the appointed MA is today is likely caused by the lack of use of DTN derived appointments resulting in either no or incorrect D0148 dataflow informing the HHDC who the MA is. Given the current low numbers of HH UMS MSIDs in the market today combined with a limited number of MAs we perceive that this is manageable today, however with the increased HH UMS MSID count it is our firm belief that for P434 to be successful all supplier agent roles should be capable of accepting DTN derived appointment requests from suppliers.</p> <p>In terms of Bulk appointment requests, we do not perceive that P434 on its own would require the bulk Change of Agent Process to be invoked by any party because the NHH UMS MSID count will be rationalised down from up to 4 Mpan per inventory down to a single HH UMS Mpan, in turn reducing the overall UMS MISD count. It should also be noted that the current NHH UMS market shares no supplier holds a portfolio of MSIDs greater than</p>

Respondent	Response	Rationale
		20,000 MSIDs so we do not believe that Bulk appointment processes needed to be considered as part of the P434 solution.
Tym Huckin Ltd	No	DTN use would provide robustness, however, other formats such as CSV files by email could also provide a solution – happy to use DTN, just offering alternatives.

Question 17: Do you agree Meter Administrators should receive D0139 data flows via the DTN? Would the benefits of this outweigh the costs?

Summary

Yes	No	Neutral/No Comment	Other
10	1	4	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	<p>The MAs have the ability to use the DTN. It seems practical to use this tool.</p> <p>Are we also expecting the DC and DA view to become regularly energised/de-energised?</p> <p>If so, we would expect to receive the D0139 as DC as well. If the MA does not send the D0379 before the settlement run than the DC will need to estimate the HH data to reflect the DE status. Otherwise, the DC will use the provided EAC or surrounding data.</p> <p>If the DC sends non-zero data to a DA that believes the site is de-energised then a D0235 exception will be raised. A mismatch in contracts will be reported upon. This will create additional effort for all parties to ensure the energisation status and HH data sent between MA, DC and DA is correct and timely. The MA will not have visibility of the D0235, this may create additional work for the DC to report these exceptions back to the MA where they are the source of non-zero data.</p> <p>The concept of a zero inventory charge code which then means the MSID can remain energised throughout the year (but settling on zeros when not in use) still needs to consider the role of DC/DA. If the DC is expected to estimate to zero when data is missing they must be inform of this. A change in EAC could be used but the DC must also be aware not to use surrounding data. A D0139 would ensure a DC knew the correct estimation method.</p> <p>Depending on the volume we would want to use flows over manual methods in these circumstances. Where a flow is used it can be easily audited and automated.</p>

Respondent	Response	Rationale
		As HHDC there will be additional development costs and ongoing costs to handle this activity.
Northern Powergrid	Yes	We believe that Meter Administrators are best placed to answer this question as the most impacted party however, we do agree that they should receive the D0139 via the DTN. Both options of sending a D0139 or zero EAC would require us to perform a system change and therefore incur costs which are unknown, although we don't believe either would be significant. We prefer the option of the sending of the D0139 and as it aligns to our current process of maintaining the record of the inventory and energising/de-energising as appropriate.
SUPPLIER A	Yes	We agree that MAs receiving D0139s via the DTN is the preferred approach
Scottish Power	N/A	
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	No	<p>The question here for me should not be whether the MA should receive the D0139 via the DTN, it is should the MA be advised of Energisation or De-energisation at all. The answer to both questions would still be No. It's also not a case of benefits vs cost for me, because there are no benefits to any agent for this to occur.</p> <p>The MA is appointed by the Supplier, and the MA will provide daily Consumption HH data for as long as they have an active appointment. The MA calculates the HH data based on the inventory provided in the D0388 UMS Inventory to the MA by the UMSO. Energisation/De-energisation decisions are made by the LDSO/UMSO today. If the UMSO determines an MSID is de-energised, they should provide the MA with an updated D0388 UMS Inventory for that MSID (and relevant Sub Meters) that uses the zero Charge Code. Given the MHHS Design looks to be taking this approach, and given MAs are not notified of the Energisation status now, I see no reason at all for this to be introduced as a new process for such a temporary period.</p>
SSE Energy Supply Limited	Yes	We agree Meter Administrators should receive D0139 flows via the DTN. The cost of this should be

Respondent	Response	Rationale
		relatively small as Meter Administrators have already confirmed they are able to use the DTN
British Gas	Yes	
Western Power Distribution	N/A	We believe MA's would be better placed to respond to this question.
Salient Systems Limited	N/A	
UK Power Networks	Yes	I have no comment in regards cost.
Scottish Power Energy Networks	Yes	As an UMISO we are happy to send the MA a zero charge code, however believe that there will still be an issue that the D0139 flows are required.
Npower Commercial Gas Limited	Yes	We support MAs gaining visibility of the energisation status and be updated upon change of energisation requests, as we believe that this will offer improvement in settlement accuracy for seasonal supplies (e.g. Xmas lights) because it will ensure that energy is only apportioned to settlement days where the equipment is in use, which is an improvement vs today whereby NHH UMS seasonal supplies often attract energisation status mismatch exceptions all year round as a consequence of a valid EAC being in place over the days where the NHH MSID is de-energised outside of seasonal use.
Tym Huckin Ltd	Yes	This would enable us to automatically update the system the change in status – no costs

Question 18: What impact will sending/receiving the D0379 and D0380 flows be for HHDCs, HHDAs and Suppliers?

High	Medium	Low	None	Other
0	4	3	1	7

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Low	<p>Low – We already have the ability to receive the D0379s from the MA. We have the ability to use the D0380. However, in line with current BSCP502 guidelines consumption is sent in a D0036/D0275 flow.</p> <p>The D0379 is already in use, the D0379 uses 3 decimal places for improved accuracy. The benefit of having data to 3 decimal places is lost if the DC cannot send this on to other parties.</p> <p>The BSCP changes makes the flow choice optional. For consistency, shouldn't the HHDC always use 3 decimals places for unmetered sites as they hold data to that level?</p> <p>Changes will need to be made to accommodate the option to send the D0380/D0379. There will be a development cost.</p>
Northern Powergrid	N/A	
SUPPLIER A	Medium	<p>It isn't clear from the proposal exactly how these data flows will be structured and sent, however there will be a cost impact to setting up these data items for UMS supplies in our systems, as well as costs associated with processing the additional data on an ongoing basis.</p> <p>It is also unclear at this stage if we should expect to receive both these flow types, or what guidelines will be in place to determine when we should receive one or the other, and if we can express a preference.</p> <p>Our systems do not currently cater for this information to 3 decimal places, and we would need</p>

Respondent	Response	Rationale
		further guidance on when this level of accuracy is optional to hold.
Scottish Power	Medium	IT system changes will be required to be made to support the proposed changes.
Stark Software Int Ltd.	Low	As HHDC and HHDA, there won't be much impact operational wise, as long as the recipients have configured their route to send/receive the D0379 and D0380 flows.
Power Data Associates Ltd	N/A	<p>Whilst I understand there will be an impact on the Supplier and HHDC to change to use the D0379/D0380 if they don't already – I'm not close enough to their systems to understand the significance of the impact and change needed.</p> <p>That said I don't see any alternative to this, to ensure that HH Data they receive is 1.as accurate as it can be, and 2.ensures that the smaller consuming MSIDs don't see HH consumption rounded to zero.</p> <p>An MSID with an inventory containing a single defibrillator for example, will consume 0.003 kWh per HH period in a day. Using Data Flows that round this to 1 decimal place would mean this would round to zero – and the customer would not be billed for any consumption at all, which clearly can't be seen as the correct approach. Clearly the move to HH consumption drives this change, but as a necessity resulting from MHHS, so we need to ensure all calculated energy consumption is given to the Supplier for settlement and billing.</p>
SSE Energy Supply Limited	Medium	Suppliers are already set up to use D0275 / D0036 flows for trading HH unmetered supplies, as such our systems are designed to receive and bill HH data to 1 decimal place. In order to change to D0379 / D0380, we would need further system changes to receive the data to 3 decimal places.
British Gas	N/A	As a Supplier we do not receive the D0379 and D0380. We are happy to receive the D0275 to one decimal place and see no value in changing this.
Western Power Distribution	N/A	We believe Suppliers, HHDA's and HHDC's would be better placed to respond to this question.
Salient Systems Limited	Low	
UK Power Networks	N/A	As I don't represent those industry parties I am not able to respond.

Respondent	Response	Rationale
Scottish Power Energy Networks	N/A	
Npower Commercial Gas Limited	Medium	<p>We perceive this will have a direct impact on the existing UMS HH market as outlined in response to Q12, so we anticipate that we would need to move the consumption dataflows currently used (D0036/D0275) to the D0379/D0380 at some point ahead of the transition to the TOM, at this point it is not clear when that should be however we feel it's important for the P434 workgroup to consider this as part of the solution.</p> <p>Our current understanding of the MHHS TOM design will not retain a split of small and large UMS currently derived through the Measurement Class, furthermore all HH consumption dataflows will be required to move Wh granularity which under current DTN derived dataflows can only be facilitated using D0379/D0380 dataflows, as they go to 3 decimal places which were originally conceived to facilitate Smart metered/domestic elective HH settlement.</p> <p>On the basis that a large proportion of NHH UMS consumed volume holds small EAC values (e.g 20 KWh per year) we feel it's necessary to move to Wh granularity in order to ensure energy consumed is allocated to the correct settlement periods, however we do acknowledge that this will come at cost and disruption to the existing HH UMS market which is why we believe this needs further development considerations within the P434 workgroup.</p>
Tym Huckin Ltd	None	

Question 19: Do you agree with the data items included in the mandated data cleanse template?

Summary

Yes	No	Neutral/No Comment	Other
9	2	4	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	
SUPPLIER A	Yes	<p>We have not identified any Alternative data items to be included in the Template.</p> <p>However, we believe all the data items require further definition.</p> <p>For example:</p> <ul style="list-style-type: none"> For Customers within a larger portfolio, where we engage with a Third-Party Intermediary rather than the end Customer, which set of data is required? In most cases we hold the TPI information but not the end Customer. Will this be sufficient? If not, we are concerned with regards to the manual effort required to obtain this information With regards to 'Date & Detail of Last Correspondence', more clarification is required as to what this means, and depending on the clarification received we may require significant manual effort to obtain this information.
Scottish Power	No	We do not see any relevance to request Invoice and Correspondence Details
Stark Software Int Ltd.	Yes	
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	No	We will need to obtain a GDPR view on whether this data can be shared.

Respondent	Response	Rationale
British Gas	Yes	
Western Power Distribution	Yes	We agree with the details required from the UMSO however we would query that if, for whatever reason, a data item is not available would it be appropriate to enter a null value?
Salient Systems Limited	N/A	
UK Power Networks	Yes-ish	<p>Instead of MPAN 1- 4, you could use MPANs A-D where the alpha is the profile category.</p> <p>It is not clear what the supplier MPID is intended to represent as populated by the supplier. The UMSO will know the MPID that is currently registered, so can provide that, but a single supplier-name entity can have many MPIDs. What if the supplier returns a different one? How is that dealt with? The UMSO will need to rely on the MPID in his data to identify the supplier name and to send the cleanse spreadsheets to suppliers.</p>
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	N/A	No comments
Tym Huckin Ltd	No opinion	The data cleanse does not apply to MA

Question 20: Do you agree with the Workgroup's initial view that P434 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
9	4	2	0

Responses

Respondent	Response	Rationale
TotalEnergies	N/A	
IMServ	Yes	
Northern Powergrid	Yes	NPg were part of the P434 Workgroup and have nothing further to add.
SUPPLIER A	No	We do not agree that P434 provides any benefits re. Objective C (transition, competition, innovation etc.). We do not see the benefits to UMS, as most UMS sites offer limited or no opportunity to alter consumption in a significant way.
Scottish Power	No	ScottishPower does not agree with the implementation date of October 2023. This change should be implemented in line with MHHS programme 2024/25, by implementing this change earlier will result in additional costs and already limited resources being taken away from the programme for little or no benefit to the industry.
Stark Software Int Ltd.	Yes	Agree that P434 better facilitates Applicable BSC Objectives C (promote effective competition in the generation and supply of electricity because the data will be more accurate and granular, esp using three decimal places, which will enable more accurate purchasing and promote innovation and competition) and D (as it will introduce more efficient and effective processing of UMS data for Settlement).
Power Data Associates Ltd	Yes	
SSE Energy Supply Limited	No	The benefits quoted in the consultation are the benefits of the MHHS Programme, and not the benefits of this modification. This implies the assumption that MHHS cannot go ahead without this modification, which is not the case. This modification only impacts a small number of

Respondent	Response	Rationale
		supplies and is confined to the unmetered stream of the programme.
British Gas	No	<p>Given the current market conditions we believe it would be wrong to potentially increase costs for a subset of customers who would be impacted by P434.</p> <p>We believe proposals such as these should be progressed within the MHHS programme where all the impacts can be assessed together and should not be progressed as a separate modification.</p> <p>We disagree that these proposals will de-risk the main MHHS programme as these proposals may well divert Supplier resources required to support the main programme.</p>
Western Power Distribution	Yes	
Salient Systems Limited	N/A	
UK Power Networks	Yes	The approach has marginal benefits.
Scottish Power Energy Networks	Yes	
Npower Commercial Gas Limited	Yes	No additional comments.
Tym Huckin Ltd	Yes	As discussed in workgroups.

Question 21: Do you have any further comments on P434?

Summary

Yes	No
5	10

Responses

Respondent	Response	Rationale
TotalEnergies	Yes	<p>We are responding to this consultation to get across the two points already stated in Q12.</p> <p>We are responding to this consultation with two areas of concern that we would like to be addressed:</p> <ol style="list-style-type: none"> 1. Customer engagement and getting their agreement to move to MHHS and appoint a Meter Administrator 2. There are costs and time/distraction impacts from delivering MHHS, which would be better served by a later delivery. <p>These areas of concern are not insurmountable, but are not ideal.</p>
IMServ	No	
Northern Powergrid	No	None
SUPPLIER A	No	
Scottish Power	No	
Stark Software Int Ltd.	Yes	<p>As DC/DA, we prefer to go for CoMC process option 2 as the transition approach.</p> <p>"Option two involves changing the CoMC process in BSCP520 so that one of the existing NHH MSIDs is changed to HH and the remaining MSIDs are de-energised/disconnected".</p>
Power Data Associates Ltd	No	
SSE Energy Supply Limited	Yes	<p>We have concerns regarding any proposals that relate to MHHS, including P434, 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</p>

Respondent	Response	Rationale
		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 the MHHS Programme will not be subject to a significant replanning exercise, which will occur by the end of the year. We do not believe that any changes required should be completed outside of the MHHS Programme governance and believe that these should be held until a decision has been made as to whether there is likely be a delay. Any changes of the nature being proposed in P434 should be included within the MHHS Programme and its replanning exercise.
British Gas	No	
Western Power Distribution	No	
Salient Systems Limited	No	
UK Power Networks	Yes	There should be a clear obligation on suppliers to communicate with their customers and advise them what is happening, when the migration will take place for them and what the impact is.
Scottish Power Energy Networks	No	
Npower Commercial Gas Limited	No	
Tym Huckin Ltd	Yes	