

Report Phase Consultation Responses



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

This Report Phase Consultation was issued on 14 October 2022, with responses invited by 28 October 2022.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Tym Huckin Ltd	MA/UMSDS
Northern Powergrid	Distributor
ScottishPower	Supplier
IMServ	Supplier Agent (HHDC/HHDA)
BUUK	IDNO
National Grid Electricity Distribution	Distributor
SSE Energy Supply Limited	Supplier
Power Data Associates Ltd	Supplier Agent (PDAL)

P434
Report Phase Consultation
Responses

3 November 2022

Version 1.0

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Question 1: Do you agree with the Panel's initial majority recommendation that P434 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	1

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	Other	ScottishPower agrees what the Modification seeks to achieve, however we do not agree that this should be mandated for parties. We fully support the data cleanse activities and welcome more engagement with the UMSO. The M11 milestone has a referenced target date of Oct 2024 but the replan now proposes Aug 2025.
IMServ	Yes	This is a proactive approach.
BUUK	Yes	We agree that P434 should be implemented with the intent of delivering MHHSP however we have concerns relating to the implementation process which we elaborate on in the response to question 7.
National Grid Electricity Distribution	Yes	Having listened to the proposed options for P434, the agreed approach outweighs the other existing option as the way best way forward.
SSE Energy Supply Limited	No	We do not believe that the requirements contained within P434 should be developed outside of the MHHS Programme.
Power Data Associates Ltd	Yes	<p>It de-risks the transition to MHHS</p> <p>The current MHHS transition plan does not address the effort required on the assumption that P434 will have happened</p> <p>It spreads the industry (and customer) effort and impact to resolve issues and to enable timely communication</p> <p>It allows the Data Cleanse activity to happen away from the time pressured activity of MHHS transition – helping to ensure the migration to MHHS isn't delayed by attempts to contact customers</p>

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P434?

Summary

Yes	No	Neutral/No Comment	Other
7	1	0	0

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	No	N/A
IMServ	Yes	N/A
BUUK	Yes	N/A
National Grid Electricity Distribution	Yes	The redline changes will help to deliver the changes required with P434.
SSE Energy Supply Limited	Yes	Whilst we do not agree that P434 should be implemented, if it is then we agree that the redlined changes to the BSC deliver its intent.
Power Data Associates Ltd	Yes	N/A

Question 3: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P434?

Summary

Yes	No	Neutral/No Comment	Other
6	2	0	0

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	No	N/A
IMServ	Yes	N/A
BUUK	Yes	N/A
National Grid Electricity Distribution	Yes	The redline changes will help to deliver the changes required with P434.
SSE Energy Supply Limited	Yes	N/A
Power Data Associates Ltd	No	The Report on Page 29 indicates that the submission of zero charge codes would achieve the same outcome of the D0139 – but the BSCP520 hasn't been updated to reflect that the UMSO would be required to send the zero charge code inventory in this scenario, so needs to be included.

Question 4: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
5	2	0	1

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	Other	The date stated in the Modification (M11) is currently under re-plan consultation and proposed to be the end of August 2025 and not the Oct 2024 date in the consultation. The modification needs to align with the replan.
IMServ	No	<p>We support the idea of pinning the P434 deliverables against the MHHS milestone plan.</p> <p>In key dates (based on current MHHS timetable) it states 'By Oct 2024 – complete NHH to HH CoMC for all UMS MSIDs as mandated by this Modification'.</p> <p>There is no key date that states when the CoMC activity can start. Based on the Implementation Date it can be inferred that '5 WDs after the authority decision is received' the process of transferring to HH can begin.</p> <p>The implementation plan does not make it clear when the BSCP502 change will come in to affect. The consultation states that the working group agreed that BSCP502 needed to include the optionality for Parties to send/process the D0379/D0380 from October 2023. However, I cannot see this date in the implementation plan or redline documents. The suggestion is that this also takes affect '5 WDs after the authority decision is received'. Participants will need sufficient time to make these changes, including system development work. Five Working Days will not sufficient.</p> <p>The key date of when the P434 CoMC activity can start and when the changes to BSCP502 are implemented should align.</p>

Respondent	Response	Rationale
BUUK	Yes	N/A
National Grid Electricity Distribution	Yes	Migrating UMS before the whole market moves to mandatory HH, will help to ensure UMS is migrated efficiently.
SSE Energy Supply Limited	No	We do not agree that P434 should be implemented.
Power Data Associates Ltd	Yes	The date set is linked to the MHHS timetable. Ofgem last week sent a letter to industry reinforcing the need to progress with MHHS if possible to the timetable they published in Spring 2021.

Question 5: Do you agree with the Panel's initial view that P434 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
8	0	0	0

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	Yes	N/A
IMServ	Yes	N/A
BUUK	Yes	N/A
National Grid Electricity Distribution	Yes	N/A
SSE Energy Supply Limited	Yes	N/A
Power Data Associates Ltd	Yes	It impacts customers.

Question 6: Do you agree with the Panel's initial recommendation 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
7	0	1	0

Responses

Respondent	Response	Rationale
Tym Huckin Ltd	Yes	N/A
Northern Powergrid	Yes	N/A
ScottishPower	Yes	N/A
IMServ	Yes	N/A
BUUK	Yes	N/A
National Grid Electricity Distribution	Yes	N/A
SSE Energy Supply Limited	Yes	N/A
Power Data Associates Ltd	No Comment	Do not understand EBGL requirements.

Question 7: Do you have any further comments on P434?

Summary

Yes	No
5	3

Responses

Respondent	Response	Rationale																																																												
Tym Huckin Ltd	Yes	With regards the redlining of BSCP520, this might be an opportune time to tighten up the wording of 3.2.5. We feel it should have the word in brackets added for clarity "Within 5 WD of receipt or by the EFD [whichever is the later date]."																																																												
Northern Powergrid	Yes	Ref. 3.6.2.1, we believe the UMSO (rather than the Supplier) should lead on identifying which NHH MSID should be retained and CoMC'd. The UMSO is responsible for the co-ordination of the data cleanse and the contact with the customer and is in a better position to understand the data and what is required.																																																												
ScottishPower	No	N/A																																																												
IMServ	No	N/A																																																												
BUUK	Yes	<p>As the responsibility for change of measurement class is to remain with the supplier, we feel strongly that it is vital for a central migration plan to be agreed which all suppliers would need to adhere to. Specific areas to consider are the selection of the category of NHH MPAN to the inventory. Proposed approach sets out the prioritisation of which NHH traded Category MPAN that should be selected for the COMC. Having a set approach would allow UMSO system suppliers to code and would also allow for inventories to be changed back to NHH in the event that reverse migration is required due to the chosen supplier not yet trading on HH basis.</p> <table border="1"> <thead> <tr> <th></th> <th></th> <th colspan="2">Category A</th> <th colspan="2">Category B</th> <th colspan="2">Category C</th> <th colspan="2">Category D</th> </tr> <tr> <th>UMS Desc</th> <th>Category</th> <th>MPAN registered</th> <th>Used for COMC</th> </tr> </thead> <tbody> <tr> <td>Continuous</td> <td>A</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Dusk to Dawn</td> <td>B</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Half Night</td> <td>C</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> </tr> <tr> <td>Dawn to Dusk</td> <td>D</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> </tr> </tbody> </table> <p>Staggered migration of implementation via individual suppliers' timelines would be impossible to manage from a systems and process perspective. We feel individual Supplier plans would compromise</p>			Category A		Category B		Category C		Category D		UMS Desc	Category	MPAN registered	Used for COMC	Continuous	A	Yes	Yes	No	No	No	No	No	No	Dusk to Dawn	B	Yes	No	Yes	Yes	No	No	No	No	Half Night	C	Yes	No	Yes	No	Yes	Yes	No	No	Dawn to Dusk	D	No	No	No	No	Yes	No	Yes	Yes						
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Respondent	Response	Rationale
		effective exchange of information across the affected parties.
National Grid Electricity Distribution	No	N/A
SSE Energy Supply Limited	Yes	Whilst we agree with the intent of P434, we are of the strong opinion that the requirements within P434 should be progressed as part of the MHHS Programme and not under a standalone BSC modification.
Power Data Associates Ltd	Yes	<p>The cost concerns raised in the previous consultation need to be balanced with the benefit of resolving issues ahead of the peak of activity during MHHS migration.</p> <p>Impact of BSC Settlement Risk – the existing NHH UMS MEM reporting is showing material error, and has done over several years, this would be removed with HH settlement.</p> <p>Impact of Modification & consumer benefit – the MHHS SCR shows significant customer/industry benefit to HH settlement. P434 will provide the benefit of accurate HH settlement a year earlier for NHH UMS.</p>