
P434 Workgroup Meeting 4 Summary

Summary

1. Meeting Objectives

The Chair welcomed attendees and presented the meeting objectives:

- Consider the responses received to the Assessment Procedure Consultation
- Agree on the final solution
- Workgroup to provide its final views against the Applicable BSC Objectives and recommendations to the BSC Panel

2. Customer Bills

- 2.1 Currently, Customers (those paying the energy bill) can choose to contract directly with the Meter Administrator (MA) and can be provided with their consumption data independently of their Supplier, this way Customers can verify their bills. Under the current proposal, the MA would be contracted with the Supplier directly and hence would be unable to send data to the Customer. An MA was of the view that there needs to be a method by which Customers can verify the values they are being charged independently of the data from the Supplier.
- 2.2 There were mixed views from the Workgroup on this topic as there's no obligation on Suppliers to provide their MA data to the Customer, so it was questioned whether this should be introduced under P434. There's also the question of whether there is value in getting data from the MA when the MA does not have a contractual relationship with the end Customer.
- 2.3 The Proposer's view was that there is an issue here, but MAs provisioning the data is not the answer and it is outside the scope of P434 as far as they are concerned – it is more a commercial issue and does not impact Settlement. The MHHS Programme is currently discussing providing annual consumption figures so this could be the way forward (but wouldn't address the issue until MHHS go-live), however this needs to be considered by the MHHS Programme. ACTION: Confirm with MHHSP if this will be the case.

3. Consultation Responses

- 3.1 The Workgroup observed that the trend in the P434 consultation responses were similar to those left for [P432 'Half Hourly Settlement for CT Advanced Metering Systems'](#)¹, where the majority of the Suppliers didn't agree that P432/P434 should be implemented and the changes proposed should be part of the MHHS Programme instead. The Supplier Agents (Data collectors, Data Aggregators and Meter Operator Agents), MAs and Distributors that responded agreed with the proposed changes and agreed that P434 better facilitates Applicable BSC Objectives C and D.
- 3.2 The Workgroup discussed challenges that UMS Customers may face getting Suppliers to take them on. There is already an issue in the market.
- 3.3 The Workgroup discussed whether P434 should be an optional rather than mandatory change. The Workgroup agreed it should remain mandatory as it was unlikely that Supplier will CoMC early if it remained optional, which would not bring the benefits P434 seeks to achieve. Further it would make planning for UMSOs much harder as they would not know what to expect. The Workgroup also highlighted the benefits of the data cleanse activity that P434 would bring. Leaving NHH UMS migration to the Programme would give Suppliers more work to do in parallel. The Workgroup also ruled out only mandating new UMS MPANs settling HH.
- 3.4 The Workgroup noted that there will be data cleanse costs regardless of which CoMC option is chosen. The Workgroup discussed that the impacts and costs for the CoMC process will be more consistent for UMSOs, whereas Supplier costs will depend on the number of MPANs they have. The Proposer highlighted that

¹ <https://www.elexon.co.uk/mod-proposal/p432/>

Suppliers will need to decide according to the size of their portfolio whether they will automate the CoMC process or do it manually. Those with a smaller portfolio may not see the need to automate this process.

- 3.5 The Workgroup agreed not to mandate using the DTN for bulk appointments and instead agreed bulk appointments could be done via the D0155 or another agreed method. The Workgroup also agreed not to mandate the use of the D0139 as the submission of the zero charge codes would achieve the same outcome, but at lower cost.
- 3.6 The Workgroup also decided not to include the DC as a recipient of the D0139, as they can already receive this. The Workgroup also agreed not to mandate the D0379/D0380, as although it would have an interim low impact on Settlement (lower and potentially zero volumes being entered even though there was consumption) the costs of making the system changes for the P434 one-off activity could not be justified for the small gain in Settlement accuracy. This issue could be mitigated by migrating the MPAN/inventories with smallest consumption to the MHHS TOM first.
- 3.7 The Workgroup discussed comments related to the Settlement Risks. In the short term the risk to Settlement was likely to change as the volatility will increase, but following CoMC migration the risk should decrease.
- 3.8 Elexon presented the data cleanse template and the suggestions and questions received from the consultation. One respondent stated that they would need to obtain a GDPR view on whether this data can be shared. The Workgroup agreed that if the data belongs to a Domestic UMS Customer than it may fall within GDPR.
ACTION: Elexon agreed to get the Legal team's view on this matter.

4. MHHS Programme

- 4.1 Reflecting on his experiences and Panel feedback on P432, the Proposer explained that it needs to be demonstrated clearly what the benefits of P434 are for the Programme and what difficulties the MHHS Programme will face if P434 is not implemented. There will be costs for migrating NHH UMS and it's not clear whether most optimal route is to do this early under P434 or under the MHHS Programme. Before the Assessment Report is presented to the Panel, the following questions need to be answered by the Programme:
 - What are the impacts and challenges of transitioning straight into the TOM for NHH UMS in the absence of P434? – The Programme should highlight what issues could arise, how P434 will help mitigate those issues and the costs and impacts associated with transitioning directly to the TOM.
 - How will Customers verify their bills? – It would be good to get a view from the MHHS Programme, but not a dependency for P434 progression.
- 4.2 The Proposer believed it important to take the time to understand these questions, especially as P434 was not as time critical as P432 and there would likely be more time to deliver P434 following the MHHS re-plan (P434 compliance dates are tied to the Programme's timetable and are not fixed). Subject to confirmation from the Programme of when they could provide an answer, a two month extension was proposed.

Actions

| No. | Action | Owner |
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| 1. | To discuss with the MHHS Programme how to solve the issue of Customer's verifying their bills. | Elexon |
| 2. | To get Legal view on whether the data in the data cleanse template can be shared under GDPR. | Elexon |
| 3. | To ask the MHHS Programme to provide answers on what the challenges of transitioning straight into the MHHS TOM are. | Elexon |