

# CP Assessment Report

## CP1529 'Earlier initiation of Supplier Agreed Meter Readings process'

**ELEXON**



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### Committee

SVG

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### Recommendation

Approve

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### Implementation Date

5 November 2020  
(November 2020 Release)



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### Contact

**Andrew Grace**

020 7380 4204

[BSC.change@elexon.co.uk](mailto:BSC.change@elexon.co.uk)

[andrew.grace@elexon.co.uk](mailto:andrew.grace@elexon.co.uk)



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## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1529 which ELEXON will present to the SVG at its meeting on 7 July 2020. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1529.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1529 solution.
- Attachment B contains the full responses received to the CP Consultation.
- Attachment C contains the CP Proposal Form.



## Supplier Agreed Read

A reading agreed between the old and new Supplier, in the event that a CoS reading is not provided by their respective NHH Data Collectors.

## Why change?

Suppliers currently have to wait 30 Working Days (WD) before initiating the Supplier Agreed Meter Readings process, when Change of Supplier (CoS) readings are missing. One of the main aims of [Ofgem's Switching Programme](#) is to allow customers, whether domestic or non-domestic, to change Supplier no more than two WDs after the day on which the switch request is submitted. As part of the Switching Programme, the 'Standstill Period' is also being reduced. This is the period of time following a CoS during which a further registration cannot validly be requested. As a result of these shortened timeframes, there is the potential for multiple CoS events to happen during the 30 WD period, resulting in a chain of missing data and Suppliers settling on estimated energy.

## Solution

To reduce the time that the old Supplier can invoke the process to chase missing CoS reads from 30 WD to 15 WD (and from 32 WD to 17 WD for the new Supplier) within [BSCP504](#) 'Change of Supplier for an existing SVA Metering System'.

In order to facilitate this change steps within BSCP504 clause 3.2.6 'Change of Supplier for an existing SVA Metering System' will be updated.

## Impacts and costs

CP1529 will impact Suppliers and Non Half Hourly Data Collectors (NHHDC). Process, reporting and system changes will be required to implement the solution. CP Consultation Respondents identified costs as 'one-off'.

A consequential change to the Master Registration Agreement Agreed Procedure (MAP) 'Procedure for Agreement of Change of Supplier Readings and Resolution of Disputed Change of Supplier Readings' (MAP08) was approved by the MRA Development Board (MDB) on 30 April 2020. Feedback from MDB was that this CP should be progressed as soon as possible and implemented in the same release.

## Implementation

CP1529 is proposed for implementation on **5 November 2020** as part of the November 2020 BSC Systems Release.

## Recommendation

We invite the **SVG** to:

- **APPROVE** the proposed changes to BSCP504 for CP1529; and
- **APPROVE** CP1529 for implementation on 5 November 2020 [as part of the November 2020 Release].

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### What is the Switching Programme?

The [Retail Energy Code \(REC\)](#) and [Central Switching Service \(CSS\)](#) are key components of Ofgem's Switching Programme. The objective of the Switching Programme is to improve customers' experience of switching, leading to greater engagement in the retail energy market by designing and implementing a new switching process that is reliable, fast and cost-effective. The [Retail Code Consolidation \(RCC\) Significant Code Review \(SCR\)](#) will consolidate existing Industry Codes into the REC.

RCC SCR changes are expected to be implemented on 1 April 2021. However, we are aware that Ofgem are reviewing the SCR plans in response to COVID-19.

The [Switching SCR](#) will implement a new switching process, utilising the CSS and requiring consequential changes to the Change of Supplier, registration and agent processes in the BSC. These changes are highlighted in redlining sent to Ofgem on 31 March 2020 and are not part of this CP. Switching SCR changes were expected in summer 2021, but as a result of the Covid-19 pandemic and following a recent Ofgem announcement, are likely to be delayed until at least September 2021.

### Issue 86 Background

ELEXON, on behalf of the [BSC Panel](#), was requested to inform Ofgem how processes relating to CoS and Change of Agent (CoA) would be impacted by the Switching Programme. These processes will impact:

- Data Collectors (DCs)
- Data Aggregators (DAs)
- MOAs
- Suppliers

Issue 86 was raised by ELEXON to consider the changes needed to the BSC and its subsidiary documents to facilitate the Switching and RCC SCRs. As part of [Issue 86 Review of processes potentially impacted by Ofgem's Switching Programme](#), the workgroup was asked to identify where processes, particularly timescales, will need to be amended to meet delivery of the RCC and Switching SCRs in 2021. If there was an opportunity to implement changes ahead of CSS go-live, they would be considered on the basis there was no risk to impairing REC and/or CSS related Changes. This proposal is one such example of this.

### What is the issue?

The Issue 86 workgroup identified that Suppliers currently have to wait 30 WD before initiating the Supplier Agreed Meter Readings process, when CoS readings are missing. Following implementation of the Switching Programme, where one of the main aims of programme is to allow customers, whether domestic or non-domestic, to change Supplier no more than two WDs after the day on which the switch request is submitted, there is a possibility that multiple CoS events could happen during the 30 WD period. This could result in a chain of missing data and multiple Suppliers settling on estimated energy due to the prior Supplier and NHHDC for every CoS event not having data available to transfer.

#### Settlement

Settlement Risk 0081 states 'A Supplier settles at least 99% of its energy for imports sites on Actual Energy at SF and R1.'

The initial Settlement Run (SF) is +16 Working Days following a given Settlement Day.

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## MAP CP 0328

[MRA Agreed Procedure \(MAP\) CP 0328](#), was raised to update the timescales in [MRA 'Procedure for Agreement of Change of Supplier Readings and Resolution of Disputed Change of Supplier Readings' \(MAP08\)](#) and was approved at [April's MDB](#). CP1529 was raised as a consequential change to MAP CP 0328.

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### Proposed solution

To reduce the time the old Supplier can invoke the process to chase missing Change of Supply Reads from 30 WD to 15 WD (and from 32 WD to 17 WD for the new Supplier), as proposed by the Issue 86 Working Group and agreed with the [MRA Issue Resolution Expert Group \(IREG\)](#).

In order to facilitate this change steps within BSCP504 will be updated:

- 3.2.6.18 – Timescale updated from +8WD to + 5WD
- 3.2.6.19 – Timescale updated from within 10WD to 2WD
- 3.2.6.20 – Timescale updated to run concurrently with 3.2.6.18
- 3.2.6.21 – Timescale updated from within 5WD to 2WD
- 3.2.6.27 – Timescale updated from 30WD to 15WD
- 3.2.6.28 – Introduced new step to mirror MAP08 and differentiate between old and new Supplier timescales
- 4.4.1 – Timescale updated from 30WD to 15WD

### Proposer's rationale

As part of Issue 86, industry subject matter experts have recommended the solution in order to streamline industry process in the spirit of Ofgem's Switching Programme. The Issue 86 workgroup identified that following implementation of the Faster Switching Programme, there is a possibility that multiple CoS events could happen in a short period of time resulting in a chain of missing data if the current window for Suppliers to initiate the Supplier Agreed Read process remains at 30 days. In order to complete the BSCP504 processes within 15 and 17 working days the NHHDC exception processes have been updated to run concurrently and shortened.. By allowing Suppliers to initiate the Supplier Agreed Meter Readings process at an earlier stage this will help to reduce the potential number of Suppliers settling on estimated data.

### Proposed redlining

Attachment A contains the proposed changes to BSCP504 to deliver CP1529.

## 4 Impacts and Costs

### Central impacts and costs

CP1529 will require changes to BSCP504. No system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1529 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'</li></ul>	None

### BSC Party & Party Agent impacts and costs

CP1529 will impact Suppliers and NHHDCs. Respondents identified 'one-off' process, reporting and system changes will be required to implement the solution.

No other BSC Parties or Party Agents have been identified as impacted.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Changes identified to systems, reporting and processes.
NHHDC	Changes identified to systems and processes.

### CP Consultation Responses – Impacts and Costs

Five of the six respondents identified impacts and costs on their organisations, with the remaining party who represented Supplier Agents stating there would be no impact or cost due to this work already being resourced. Changes identified by all parties were listed as a combination of changes to processes, reporting and systems. Where applicable these were listed as one-off costs and respondents unanimously agreeing with the implementation approach. Respondents did not give any indication of the magnitude or costs although four respondents described the costs as 'one-off'.

## 5 Implementation Approach

### Recommended Implementation Date

CP1529 is proposed for implementation on **5 November 2020** as part of the [November 2020 BSC Systems Release](#).

All respondents to the CP Consultation agreed with the Implementation Date.

The November 2020 Release is the next available Release that can include this CP. Subject to approval by the SVG on 7 July 2020, this will leave approximately four months to implement. We recognise that it is a busy period, exacerbated by the current COVID-19 situation, but once Ofgem has directed the SCR changes, planned for November 2020, there is likely to be a moratorium on changes impacting the SCRs. This will also coincide with the release date of MAP CP 0328.

It was also agreed with the Issue 86 Group and with Ofgem, that any changes raised from the Issue Group should not be directed through the SCRs, due to industry familiarity with the current change process and to ensure that the CP has full industry visibility. There is a risk that Suppliers and Agents could miss the changes, if they were part of the significant number of changes being made across eight industry codes under the SCRs.

Due to its alignment with the objectives of the Switching Programme and MAP CP 0328, we are targeting November 2020 to ensure there is no delay in implementation.

### SVG's initial views

The Supplier Volume Allocation Group (SVG) considered CP1529 at its meeting on 3 March 2020 ([SVG229/17](#)) as part of Other Business and Matters Arising, rather than via the usual Progression Paper. Following the Issue 86 recommendation to progress this CP there was not sufficient time to submit a Progression Paper without adding an extra month to the progression timeline of this CP. The view was taken that it was better to give more time to implement this CP, than to present a Progression Paper.

The SVG confirmed they were happy for the CP to go straight to consultation phase and did not ask for any additional questions to be added to the CP Consultation.

## 7 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1529 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1529 proposed solution?	6	0	0	0
Do you agree that the draft redlining delivers the intent of CP1529?	5	0	0	1
Will CP1529 impact your organisation?	5	1	0	0
Will your organisation incur any costs in implementing CP1529?	5	1	0	0
Do you agree with the proposed implementation approach for CP1529?	6	0	0	0
Do you have any further comments on CP1529?	2	4	-	-

In total 6 responses were received from a combination of Suppliers and Supplier Agents. Multiple respondents represented a number of roles. In total there were representatives of four Suppliers, four NHHDC, two NHHDA, two HHDC, two HHDA and one Supplier Agent (not stated). Respondents were unanimous in their support of the CP1529 solution and all but one respondent were supportive of the redlining that would deliver it.

### Red-lined Text

#### Non-Domestic D0311

A Supplier Agent queried whether the D0311 could be applicable to non-domestic supplies as well as domestic. We responded to the participant involved advising that we believe the restriction on sending a D0311 is held in the MRA currently on Clause 29.2 and is therefore outside of the scope this CP. This has been moved to the draft REC Registration Schedule (11.5.1). In order to progress this we believe a change request would need to be made via the Ofgem switching programme in the short term or the REC change management process in the longer term.

### Further Comments

#### Second request for Meter reading history (MRH)

A Supplier Agent queried whether the changes could include an update to BSCP504 clause 3.2.6.18 to change the information required and method. This clause gives the New NHHDC a second opportunity to request Meter reading history (MRH) from the Old NHHDC if they have not been able to load it after making reasonable efforts to do so. We responded to the participant advising them this was discussed in one of the Issue 86

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Workgroups; the D0170 (Request for Metering System Related Details) is sent in 3.2.6.6 and should receive an automated response.

The argument at the meeting was that, if you sent a D0170 and got no response (e.g. because the old NHHDC had no history data), then sending a second D0170 would in all probability have the same result as the first.

3.2.6.18 is effectively an escalation in order to attempt to trigger a different response hence the different method and information required. If this results in an easy resolution of why the original D0170 wasn't responded to, then this could be turned around quickly. But if there is no easy resolution (e.g. because the old NHHDC has no history data), then it is probably time to revert to the Missing Reads process and invoke the Supplier-Supplier process, as the NHHDC-NHHDC process isn't working.

Following feedback provided to the Supplier Agent they understood the rationale behind the proposal..

The Supplier Agent also requested the timescale be kept at 5WD as opposed to newly introduced 2WD. We believe this would result in misalignment between the MRA CP and BSCP504 and therefore informed the participant we would not recommend the proposed change.

## 8 Recommendations

We invite the **SVG** to:

- **APPROVE** the proposed changes to BSCP504 for CP1529; and
- **APPROVE** CP1529 for implementation on 5 November 2020 [as part of the November 2020 Release].

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## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CoA	Change Of Agent
CoS	Change of Supplier
CP	Change Proposal
CSS	Central Switching Service
DA	Data Aggregator
DC	Data Collector
EFR	Error and Failure Resolution
HH	Half Hourly
MOA	Meter Operator
MRH	Meter Read History
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector
R1	First Settlement Reconciliation
RCC	Retail Code Consolidation
REC	Retail energy Code
SCR	Significant Code Review
SF	Initial Settlement Run
SVG	Supplier Volume Allocation Group
WD	Working Days

### External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	Ofgem Switching Programme	<a href="https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme">https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme</a>
2	BSCP504	<a href="https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp504/">https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp504/</a>

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External Links		
Page(s)	Description	URL
3	Retail Energy Code	<a href="https://www.ofgem.gov.uk/licences-industry-codes-and-standards/industry-codes/electricity-codes/retail-energy-code-rec">https://www.ofgem.gov.uk/licences-industry-codes-and-standards/industry-codes/electricity-codes/retail-energy-code-rec</a>
3	Central Switching Service	<a href="https://www.ofgem.gov.uk/publications-and-updates/uk-link-and-proposed-central-switching-service">https://www.ofgem.gov.uk/publications-and-updates/uk-link-and-proposed-central-switching-service</a>
3	RCC SCR	<a href="https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement">https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement</a>
3	Switching SCR	<a href="https://www.ofgem.gov.uk/publications-and-updates/switching-significant-code-review-launch-statement-and-request-expressions-interest-participate-programme-workgroups">https://www.ofgem.gov.uk/publications-and-updates/switching-significant-code-review-launch-statement-and-request-expressions-interest-participate-programme-workgroups</a>
3	BSC Panel	<a href="https://www.elexon.co.uk/group/the-panel/">https://www.elexon.co.uk/group/the-panel/</a>
3	Issue 86	<a href="https://www.elexon.co.uk/smg-issue/issue-86/">https://www.elexon.co.uk/smg-issue/issue-86/</a>
4	MAP CP0328	<a href="https://www.mrasco.com/changes/change-tracker/">https://www.mrasco.com/changes/change-tracker/</a>
4	MAP08	<a href="https://www.mrasco.com/mra-products/mra-agreed-procedures/">https://www.mrasco.com/mra-products/mra-agreed-procedures/</a>
4	April MDB	<a href="https://www.mrasco.com/meeting/mdb/2020-04-30/">https://www.mrasco.com/meeting/mdb/2020-04-30/</a>
5	IREG	<a href="https://www.mrasco.com/meeting/ireg-37/">https://www.mrasco.com/meeting/ireg-37/</a>
7	ELEXON Releases	<a href="https://www.elexon.co.uk/change/releases/the-release-and-implementation-process/">https://www.elexon.co.uk/change/releases/the-release-and-implementation-process/</a>
7	SVG 229	<a href="https://www.elexon.co.uk/meeting/svg229/">https://www.elexon.co.uk/meeting/svg229/</a>

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