

CP Consultation Responses



CP1532 'Reduce Half Hourly Change of Supplier timelines to meet the Initial Settlement Run'

This CP Consultation was issued on 14 July 2020 as part of CPC00805, with responses invited by 10 August 2020.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Association of Meter Operators	1	N/A (non-BSC party)
EDF	1	Supplier
EON	4	Supplier, MOA, NHHDC, HHDC
IMServ Europe	3	HHDC, NHHDC, MIA
Scottish Power	2	Supplier, Supplier Agent (not stated)
Siemens	4	HHDC, HHDA, NHHDC, MOA
SMS Energy Services Limited	4	NHHDC, HHDC, NHHMOA, HHMOA
SSE Energy Supply Ltd	1	Supplier
Stark	4	NHHDC, NHHDA, HHDC, HHDA
Western Power Distribution	2	Distributor, MOA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Association of Meter Operators	✓	-	-	-
EDF	✗	✓	✓	✗
EON	✓	✓	✓	✗
IMServ Europe	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✗
Siemens	✓	✗	✗	✓
SMS Energy Services Limited	✓	✓	✓	✗
SSE Energy Supply Ltd	✓	✓	✓	✓
Stark	✓	✗	✗	✓
Western Power Distribution	✗	✓	✓	✓

Question 1: Do you agree with the CP1532 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
8	2	0	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	Broadly agree.
EDF	No	<p>While we broadly agree that these changes detailed in CP1532 may be sensible to progress at some point, we do not agree that these changes should be made in advance of the other changes required in our systems to support faster switching and Ofgem's Switching Programme. Accelerating the timescales for sending dataflows to require them to be sent before the end of the objection window would create a number of problems; these changes would be better made when the objection window is shortened by faster switching. Making these changes early will increase the overall cost of implementation with minimal benefit to be gained as a result.</p> <p>We are also concerned that these changes create significant branching between the requirements for HH and NHH MPANs, which then increases the complexity of the arrangements and creates additional scope for confusion. Wherever possible the timescales for sending registration related dataflows should be aligned across the HH and NHH markets – especially where the timescales are being driven by the need to process data in time for the Initial Settlement Run.</p>
EON	Yes	In the context of the required changes associated to faster more reliable switching, we support this change proposal. We believe that the changes adequately facilitate quick switching within the context of the associated BSCPs.
IMServ Europe	Yes	<p>HHDC:</p> <p>We do support the concept; however, we recognise that whilst the CP seeks to improve the robustness of the process, the proposal could possibly result in the process taking longer in some instances.</p>

Respondent	Response	Rationale
		All other roles: No comment
Scottish Power	Yes	Yes, we understand the changes as a result of the CSS faster switching solution
Siemens	Yes	Formalising the timing of flows ensuring CoS activities can be completed in time for the Initial Settlement Run is a sensible change that adds clarity to the processing.
SMS Energy Services Limited	Yes	We agree that CP1532 does deliver improvements. There are challenges with direct customer contracts when reducing the SLA to 2wd on new registrations due to the MPAN often being unknown to mop and DC prior to receiving the D0155. Compliance with the redlined changes will be reliant on the supplier following the agreed process (e.g. agreed contract references).
SSE Energy Supply Ltd	Yes	We support the change in principle, however the solution as proposed will cause an issue with the timing of the de-appointment flows. Currently, when there is a change of Supplier, there is a delay in the old Supplier sending the D0151 flows to de-appoint agents. This delay is to allow time for the objection window to expire. The draft red-lining states that D0151 should be sent by Supply Start Date (SSD), it is therefore possible that SSD could be before the objection window has closed. This would mean that if an objection request was upheld, a Supplier may have to manually re-appoint their agents after having just de-appointed them. Before the implementation of the Ofgem Switching Programme (OSP) it is not possible to change the timing for D0151 flows. We would suggest that to avoid the above issue, it would be better to remove the D0151 part of the redlining/ change from implementation as part of CP1532, and instead implement the D0151 related change at the same time as or after OSP implementation.
Stark	Yes	
Western Power Distribution	No	We are supportive of the proposed changes to reduce the HH CoS timelines however, we have

Respondent	Response	Rationale
		<p>concerns in respect of section 5.2.4.8 where a MOA is required to send the D0268 within 2 WDs.</p> <p>Our MOA has concerns that 2 WDs would not be achievable where, for example, there has been a contract change and a large volume of D0170's are received for processing. We feel that 3 WDs would be more appropriate.</p>

Question 2: Do you agree that the draft redlining delivers the CP1532 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
7	3	0	0

Responses

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

Respondent	Response	Rationale
Association of Meter Operators	No	See comments on red lining
EDF	Yes	
EON	Yes	We agree that the draft redlining delivers the solution.
IMServ Europe	Yes	HH: Mostly agree but see red line comments at the end of this document All other roles: No comment
Scottish Power	Yes	Yes, we agree the draft redlining delivers the CP proposed solution
Siemens	No	Some observations on the changes explained below
SMS Energy Services Limited	Yes	
SSE Energy Supply Ltd	No	As per our response to Q1, the solution as proposed will have an unintended impact on impact timings for Suppliers sending the de-appointment flow. The draft red-lining states that D0151 should be sent by Supply Start Date (SSD), it is therefore possible that SSD could be before the objection window has closed. Before the implementation of the Ofgem Switching Programme (OSP) it is not possible to change the timing for D0151 flows.
Stark	Yes	
Western Power Distribution	Yes	We believe that the draft redlining delivers the CP1532 proposed solution.

Question 3: Will CP1532 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	N/A	
EDF	Yes	We would need to make system and process changes in both our Supplier and HHMOA systems in order to be able to deliver the changes in CP1532. As noted in our response to question 1 the costs of making these changes will be higher as a result of implementing ahead of the changes required for faster switching.
EON	Yes	There will be significant system and process impacts from this change. Within our review of BSCP 514 we noted that HHMOA's still have 5 WD's to issue the D0268 under step 5.2.4.10. we believe that this is a missed opportunity and should be update to 'within 1 WD of step 5.2.4.8 to ensure that HHDC can also meet quicker turnaround times for reading meters etc.
IMServ Europe	Yes	HH: This proposal would mean HHDCs would potentially not receive D289s until 3 WDs after being appointed. Could the decision to delay the D289 be explained? Is it to prevent the Supplier sending the flow to the wrong HHDC and that it is better to wait until the HHDC has issued the D0011? Also, the HHDC may not receive the D268 for a further 5 WDs. This would leave sites estimating on default EAC for this period, which is a backwards step it would seem, although the appointment process itself would be more robust. HHMOP: Impacts HHMO as timescales for responses to certain flows are being tightened. Most of the time

Respondent	Response	Rationale
		<p>responses are automated, so timescales not an issue. We need to change the processes where there are exceptions so that manual handling meets the new timescales.</p> <p>All other roles: No comment</p>
Scottish Power	Yes	Yes, there is an impact as there will be an impact to automating flows within our system
Siemens	No	
SMS Energy Services Limited	Yes	There will be some minor system and process updates. There will also be additional resources required to ensure that we adhere the new SLA's. Also see comments regarding customer comments in response to question 1.
SSE Energy Supply Ltd	Yes	As mentioned in our responses to Q1 and Q2, we anticipate the change will cause an issue in the timing of the losing Supplier sending the de-appointment flow D0151 within the objection window. Further impact assessment would be needed to ascertain the system and process impact of this, but we assume that as changes cannot be made to the timing of the D0151 ahead of OSP implementation, we would have to develop a temporary manual workaround to re-appoint agents where an objection has been upheld but a D0151 has already been actioned within the objection window.
Stark	No	
Western Power Distribution	Yes	Although there may be some internal system changes required the impact should be minimal.

Question 4: Will your organisation incur any costs in implementing CP1532?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	0

Responses

Respondent	Response	Rationale
Association of Meter Operators	N/A	
EDF	Yes	There will be one off associated costs with implementing system changes.
EON	Yes	We believe we will incur costs associated to systems exceptions handling and process updates to ensure that our supplier and agent roles are managing the processes in line with the new SLA's. Overall, we believe these costs are likely to be delivered across E.ON's market roles.
IMServ Europe	Yes	NHHDC: Small increase in ongoing costs as exceptions need to be handled quicker and we will more often reject an appointment and need it re-sending as have less time to sort it out 1st time around All other roles: No comment
Scottish Power	Yes	Yes, One Off cost of £20k to investigate, change, test and implement the new timelines Enduring costs of ~£10-15k per annum as the reduced timelines mean we will have to resource for the highest number of failures with little or no availability to "flatten the peak".
Siemens	No	
SMS Energy Services Limited	Yes	There will be additional incurred costs for the resources required to implement CP1532.
SSE Energy Supply Ltd	Yes	Further impact assessment would be required to understand cost detail, however there may be cost associated for resource and development of a temporary manual solution as described in our answer to Q3.

Respondent	Response	Rationale
Stark	No	
Western Power Distribution	Yes	Minimal impact costs will be incurred.

Question 5: Do you agree with the proposed implementation approach for CP1532?

Summary

Yes	No	Neutral/No Comment	Other
5	3	1	1

Responses

Respondent	Response	Rationale
Association of Meter Operators	N/A	
EDF	No	As previously noted we believe that these changes should be aligned to the implementation of the faster switching changes in 2022. There is no clearly defined benefit in making these changes earlier, but this will result in an increase in overall cost.
EON	No	Given the proposed timing of this is Feb 2021, this occurs during an extremely busy part of the FMRS plan at the point where UEPT is about to commence a key time for LP participation. Given we have indicated that there would be significant change to both process and system we believe this would be a bad time for any industry changes to be released that required Licenced parties to make and put live system changes. Additionally, the industry is still dealing with the ongoing impacts of Covid-19. Our preference would be Nov 2021 as Feb 2022 cuts into the go live range for FMRS.
IMServ Europe	Yes	
Scottish Power	Comment noted	In view of all current obligations, remobilising from CODV19 relief period and SMART roll out we believe it would be more appropriate to implement this change near to CSS implementation date.
Siemens	Yes	
SMS Energy Services Limited	No	We understand that the Feb 2021 implementation date was chosen to ensure these changes are in place prior to CSS Connect going live in Summer 2021. We disagree with the proposed implementation date as it will not provide enough time to put all the required processes and system updates in place given the current COVID 19 situation. There will also be time required to work

Respondent	Response	Rationale
		with suppliers to ensure the correct contract references are sent.
SSE Energy Supply Ltd	Yes	
Stark	Yes	
Western Power Distribution	Yes	

Question 6: Do you have any further comments on CP1532?

Summary

Yes	No
2	8

Responses

Respondent	Response	Comments
Association of Meter Operators	Yes	See red lining
EDF	No	
EON	Yes	We understand that there is a requirement to update the timescales for faster switching and to align with the REC, however, we would like to see further work to explore if the process could be made quicker without processing the appointment flows at SSD-1 and cutting into the objection, withdrawal, annulment process windows.
IMServ Europe	No	
Scottish Power	No	
Siemens	No	
SMS Energy Services Limited	No	
SSE Energy Supply Ltd	No	
Stark	No	
Western Power Distribution	No	

BSCP502

Respondent	Location	Comment
Association of Meter Operators	3.2 several references	Similar lack of recognition of the D0262 rejection.
Association of Meter Operators	3.2.3.7	Similar to points on BSCP514 for "By SSD"
IMServ Europe	3.2	<p>This section has never made complete sense.</p> <p>The MOP timetable of activities is driven off "Within 5 WD of the installation and commissioning of MS." whilst the HHDC and Supplier activities are driven from "On appointment of new HHDC" with no link between the two.</p> <p>A HHDC could therefore receive a D268 from a MOA before the D155 from the Supplier.</p> <p>Perhaps this could be tidied up and a more logical timetable be set?</p>
IMServ Europe	3.2.3.1	<p>Although the redlining is fine, a significant number of appointments received are retrospective, i.e. for historical dates. This being the case, all Agents would fail the timescales in each subsequent step under this red lining.</p> <p>(The PARMS information received by ELEXON could be used to provide statistics on these numbers)</p> <p>Are you suggesting that the HHDC should reject every appointment that does not meet SSD-1 or better?</p> <p>Can clarification on what is expected to happen should the D155 arrive late be given please.</p>
IMServ Europe	3.2.4.2	<p>I am not sure what this activity actually is "Sufficient details of HHDC's appointment in respect of a SVA MS to enable the HHDC to perform its HHDC functions. These details shall include the relevant SVA MSID and the Identifiers for the MOA and, as the case may be, the HHDA, the LDSO and the applicable GSP Group. The details shall also include the Settlement Days for which the HHDC and HHDA are appointed."</p> <p>The HHDC cannot yet record who the MOA or HHDA are since the D148 has yet to arrive.</p> <p>As this is an internal HHDC process, and at this point in time the HHDC would not have MS details,</p>

Respondent	Location	Comment
		can this step be removed, we don't think it has any value - If the action is to just respond with a D0011, these other words are superfluous and should be removed each time they occur.
IMServ Europe	3.2.4.5	If the MOA is now getting the D148 later this extends the time by which the D268 is sent from MOP to HHDC as the MOP issues the flow 'Within 5 WD of notification of new HHDC'. As discussed with Andrew Grace, we agree that this is a trade off against a more robust appointment process and is unlikely to have a significant material effect.
Siemens	3.2.1.3	The footnote numbers are now out of sequence though do relate to the correct point. Footnote 8 should now be footnote 7 and so on.
Siemens	3.2.3.7 et al	I would prefer the BSCP provide greater clarity on the "By SSD" statement. I presume it means by SSD of the new appointment but it isn't clear. Also does "by SSD" mean it can be carried out on SSD as timescales for the D0155 provision is by SSD-1? Previous version is last date of Supplier appointment which is a day before SSD of the new appointment. Is this an intended difference? Is there a definition of Supply Start Data anywhere (not in this BSCP or the BSC as far as I am aware)?
Siemens	3.2.5.1	I would prefer to see "Within 1 WD of receipt of D0011 from MOA"
Siemens	3.2.6.1	This is an odd one as it requires the receipt of the D0011 from the HHDA where there is currently no obligation in BSCP503 on the HHDA to submit the D0011 in response to appointment notification. Either make changes to BSCP503 and formalise the appointment process as a contractual relationship between the Supplier and the HHDA or I suggest stating "Within 1 WD of receipt of D0172 or D0213".
Siemens	3.2.7.1 3.3.1.3	Missing from this clause is the optional sending of a D0302 to an HHDC for Supplier Serviced MPANs. Also, although not relevant to the proposed change the optional sending, and therefore, I presume, holding of D0302 data by an HHDC for EHH Meters will mean the HHDC retains personal information (name and contact details) of the consumer. Has this retention been assessed for GDPR rules? It is an area, as an HHDC considering processing EHH, that we are concerned about as we will not need

Respondent	Location	Comment
		the information for data retrieval or data collection purposes.

BSCP504

Respondent	Location	Comment
Siemens	3.2.6.4(a)	As with BSCP502 (3.2.3.7) I would prefer it made clearer that when de-appointing an MPAN the timeline should state that it is SSD of the new appointment. I assume this is up to and including the date of SSD, i.e. not SSD -1D

BSCP514

Respondent	Location	Comment
Association of Meter Operators	5.2.4.4, 5.2.7.4, 6.2.4.4, 6.2.5.4	Not clear the context of "By SSD". Is this by the SSD of the new supplier? In the context of the 'old supplier' this is the end of current Supplier appointment. Should be clarified
Association of Meter Operators	5.2.7.5	Not clear of the trigger being all D0011s, if one agent does not respond then the step will stall indefinitely. This fundamentally changes this step. There is no mention in this step of the D0261 rejection of appointment. It would assist if the BSCP put a timeframe on the Supplier to react and resolve any D0261 rejections
Siemens	5.2.4.4 et al	As above comments on SSD