

CP Consultation Responses

CP1534 'Introduce Change of Supplier (CoS) - No Meter Process'



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 |
|-----------------------------|--|--------------------------------|
| Centrica | 1 | Supplier |
| EDF | 4 | Supplier, NHHDC, NHHMOA, HHMOA |
| EON | 4 | Supplier, MOA, NHHDC, HHDC |
| IMServ Europe | 2 | NHHDC, HHDC |
| Scottish Power | 1 | Supplier Agent (not stated) |
| 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? |
|-----------------------------|--------|-----------|--------|-------------|
| Centrica | ✓ | ✓ | ✗ | ✓ |
| EDF | ✓ | ✓ | ✓ | ✓ |
| EON | ✓ | ✓ | ✓ | ✗ |
| IMServ Europe | ✓ | ✓ | ✓ | ✓/✗ |
| Scottish Power | ✓ | ✗ | ✗ | ✓ |
| SMS Energy Services Limited | ✓ | ✓ | ✓ | ✗ |
| SSE Energy Supply Ltd | ✓ | ✗ | ✗ | ✓ |
| Stark | ✓ | ✗ | ✗ | ✓ |
| Western Power Distribution | ✓ | ✓ | ✓ | ✓ |

Question 1: Do you agree with the CP1534 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 9 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|-----------------------------|----------|---|
| Centrica | Yes | |
| EDF | Yes | |
| EON | Yes | We support the proposed solution as it is necessary given that the CSS changes through Ofgem's switching programme remove the ability to continue using the MAP 04 process for registrations deletion. |
| IMServ Europe | Yes | HH: We support capturing this activity within BSCP502 explicitly and agree it should align where possible to the NHH processes. All other roles: In many instances this is what happens in practice so this is formalising the process |
| Scottish Power | Yes | |
| SMS Energy Services Limited | Yes | We agree and feel this will bring consistency in this scenario. |
| SSE Energy Supply Ltd | Yes | We support this change as it will be beneficial to suppliers, DCs and MOAs to have processes in the BSCPs to give clarity on which dataflows to send when there is no metering equipment at a site. |
| Stark | Yes | |
| Western Power Distribution | Yes | We support the proposed solution to introduce a process for a Change of Supplier where there is no meter present. However, does the new process need to be clearer that this process is only to be used if no meter has been installed on a metering point, rather than where a meter has been removed from a metering point or where there are no MTDs, or is the intention of this process change to address all/some scenarios? |

Question 2: Do you agree that the draft redlining delivers the CP1534 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 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 |
|----------------|----------|---|
| Centrica | No | See comments below |
| EDF | Yes | Overall we agree with the draft redlining, however would like the additional clarification text in footnote 69 included in BSCP514 6.2.6.9 to make it clear the D0150 should be sent to all relevant parties, even when no meter is present. |
| EON | Yes | |
| IMServ Europe | No | <p>HH:</p> <p>We do have a couple of points worth clarification – see below</p> <p>All other roles:</p> <p>All other roles: BSCP514 is OK where there has previously been a meter installed on the MPAN. In this case there is an MSMTD date to populate in the short D0150/D0268. Where there has never been a meter installed, MOPs will still be unable to send a short D0150/D0268 as MSMTD is mandatory in the flow and MOPs have nothing to populate in this flow.</p> <p>BSCP504 – as written it suggests the old NHHDC will send MRH to the new NHHDC. The new NHHDC will only have a short D0150 from the new MO and so would not be able to process any MRH – nor would I expect the old NHHDC to actually send any.</p> <p>We do not think this really delivers a solution to the issue.</p> |
| Scottish Power | Yes | |

| Respondent | Response | Rationale |
|-----------------------------|----------|---|
| SMS Energy Services Limited | Yes | We think that there should be additional notes to make it clear the no actual meter details will be sent when following this process. |
| SSE Energy Supply Ltd | Yes | |
| Stark | Yes | With regards to redlining of BSCP 504 please could relevance of section 3.2.8.8 be clarified; does not seem to belong with this process. |
| Western Power Distribution | No | <p>The requirement in section 6.2.6.5 is for the current MOA to send a D0303 to the MAP. Pending clarity to our query in Question 1, we believe there are three possible scenarios where there could be a "No Meter" situation:</p> <ol style="list-style-type: none"> 1. No meter ever installed. 2. Meter installed, removed and not replaced. 3. Meter installed but MTDs are not available. <p>In scenarios 1 and 3 a D0303 could not be sent as there are no MTDs available and the MOA would not know who the MAP is (if one was appointed). In scenario 2, if there was a meter installed and subsequently removed, the MOA would have already sent a D0303 on removal of the meter. We therefore feel a D0303 in a "No Meter" situation cannot be sent and therefore this section should be removed from the BSCP 514 redlining.</p> <p>We would also note that the redlining is not reflecting the new timings which have been proposed under CP1532.</p> |

Question 3: Will CP1534 impact your organisation?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 3 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|-----------------------------|----------|---|
| Centrica | Yes | |
| EDF | Yes | Process and system changes will be required to align with the new processes outlined in BSCP502, BSCP504 and BSCP514 |
| EON | Yes | We expect the change to be process related, as the current process to delete a registration is very much an exceptions process. |
| IMServ Europe | Yes | <p>MOP:</p> <p>As a MOP we already send a short D0150/D0267 when we can – but if there has never been a meter installed we do not have an MSMTD – so these will not trigger a flow and hence will not resolve the issue.</p> <p>NHHDC:</p> <p>As an NHHDC I don't think there is any impact as we will still not send any MRH where there is no meter on site</p> |
| Scottish Power | No | |
| SMS Energy Services Limited | Yes | <p>This will have a positive impact on our organisation as this scenario causes stalled processes which can have a negative impact.</p> <p>We will have to make some system changes to ensure that we fully comply with this change.</p> |
| SSE Energy Supply Ltd | No | |
| Stark | No | |
| Western Power Distribution | Yes | The proposed change will require internal process and document changes. No system changes will be required. However, on receipt of a D0170, in order to send a D0268 or D0150 where there is no meter present a blank flow would be sent. |

Question 4: Will your organisation incur any costs in implementing CP1534?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5 | 4 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|-----------------------------|----------|--|
| Centrica | No | |
| EDF | Yes | There will be one off associated costs with implementing system changes. |
| EON | Yes | We expect any costs associated to this CP to be minimal. |
| IMServ Europe | Yes | Depending on the result of the point made in Q2 above, we may need to make changes to our MOP system to default the MSMTD in order to trigger flows – which would be a system change |
| Scottish Power | No | |
| SMS Energy Services Limited | Yes | There will be additional incurred costs for the resources required to implement CP1534. |
| SSE Energy Supply Ltd | No | |
| Stark | No | |
| Western Power Distribution | Yes | Costs will be incurred but these will be limited to process and document changes and therefore will be minimal. |

Question 5: Do you agree with the proposed implementation approach for CP1534?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6 | 2 | 0 | 1 |

Responses

| Respondent | Response | Rationale |
|-----------------------------|----------|--|
| Centrica | Yes | |
| EDF | Yes | |
| EON | No | |
| IMServ Europe | Yes/No | If the result of the above requires system changes to MOP to default the MSMTD, then depending on how quickly that is known would then depend on whether a Feb 2021 go live date is feasible or not. Realistically we need to know in October about this in order to hit Feb 2021. |
| Scottish Power | 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 feel that the implementation date doesn't provide enough time to ensure we comply with these changes across all agents given the current situation with COVID 19. |
| SSE Energy Supply Ltd | Yes | |
| Stark | Yes | |
| Western Power Distribution | Yes | |

Question 6: Do you have any further comments on CP1534?

Summary

| Yes | No |
|-----|----|
| 1 | 8 |

Responses

| Respondent | Response | Comments |
|-----------------------------|----------|--|
| Centrica | No | |
| EDF | No | |
| EON | Yes | <p>We feel that it's important to highlight that the D0268 dataflow completion note in Annex C of the DTC should also be updated to include the rules to confirm what's included where no meter exists on CoS or some other form dataflow completion guidance.</p> <p>E.ON notes that the procedure set out in the redlining for BSCP 514 5.2.9 is by design similar or the same as other CoS related processes and consequently will count the no meter process into any related PATs associated to the D0268. Whilst we believe that the current MOA will have obtained the relevant information to populate a no meter D0268 via the new connection procedures defined BSCP 514 5.2.2, it is plausible that other parties may choose other ways to complete it in the absence of any clear guidance that defines where to take it from and what to populate. We believe that could cause a mis-understanding within organisations, leading to delays with transmitting the no meter D0268 in a timely manner which could otherwise have been prevented through industry defined dataflow completion guidance or an update to annex C.</p> |
| IMServ Europe | No | |
| Scottish Power | No | |
| SMS Energy Services Limited | No | |
| SSE Energy Supply Ltd | No | |
| Stark | No | |

| Respondent | Response | Comments |
|----------------------------|----------|----------|
| Western Power Distribution | No | |

BSCP502

| Respondent | Location | Comment |
|---------------|--------------------|--|
| Centrica | 3.2.8.1 | When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed. |
| Centrica | 3.2.8.2 | Most of the text in this row appears to relate to responding to 3.2.7.1 which has multiple flows and should be removed. |
| Centrica | 3.2.8.4 | When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD, this says On Termination so should be changed. |
| Centrica | 3.2.8.5 | As there is no meter are Faults and D0002 relevant? |
| Centrica | 3.2.8.6 3.2.8.7 | As there is no meter I don't think either of these would/could occur. |
| IMServ Europe | 3.2.8 | Does this process only apply where there is a new Supplier and new HHDC since 3.2.8.1 has From 'New Supplier' To 'New HHDC' |
| IMServ Europe | 3.2.8.2 | In 3.2.8.2 the 'ACTION' and 'INFORMATION REQUIRED' columns describe a process involving 'SVA MS' and in this case there isn't one? I think both of these items descriptions should be removed leaving the sending of the D0011 as is. |
| IMServ Europe | 3.2.8.5 | Notwithstanding this point, in 3.2.8.5 the MOA is expected to send a D268 to the HHDC by SSD, surely there is no meter on site? As far as I know both D268 and D0002 flows must contain the Meter Id (Serial Number) and no meter exists onsite. What is intended here? Is it intended that this process would inform HHDCs such that they would not request previous consumption data? Please explain. |

BSCP504

| Respondent | Location | Comment |
|------------|----------|--|
| Centrica | 3.2.8.1 | When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed. |

| Respondent | Location | Comment |
|---------------|----------|--|
| Centrica | 3.2.8.6 | As there is no meter and potentially never was the best the DC can send is the EAC/AA based on final reading from meter removal. If the DC was never aware of a meter then the flows won't be sent. I think this needs to be made clearer within the steps (not footnote). |
| Centrica | 3.2.8 | The BSCP502 change includes sending D0151 (de-appointment) is there a reason the same step has not been included here? |
| IMServ Europe | 3.2.8.6 | In practice the old NHHDC will not send any MRH if there is no meter on site |

BSCP514

| Respondent | Location | Comment |
|----------------------------|---------------------|---|
| Centrica | 5.2.9.1 | When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed. |
| Centrica | 6.2.6.1 | When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed. |
| IMServ Europe | 5.2.9.9 5.2.9.11 | As above, where there has never been a meter at site then there is currently no way to populate the MMTD which is mandatory in the flows – so this flow will only be sent if there has been a meter at site that has now been removed |
| Western Power Distribution | 6.2.6.5 | Remove the obligation to send a D0303 |