

# CP Consultation Responses



## CP1541 'Use of DTC data flow D0004 in Half Hourly Sector to inform Suppliers that a manual download to obtain data was not successful'

This CP Consultation was issued on 8 March 2021 as part of the March 2021 CPC batch, with responses invited by 6 April 2021.

### Consultation Respondents

| Respondent                                     | No. of Parties/Non-Parties Represented | Role(s) Represented               |
|--|--|-----------------------------------|
| Drax BSC Parties (Opus Energy and Haven Power) | 4                                      | Generator, Supplier, ECVNA, MVRNA |
| IMServ   | 1                                      | HHDC                              |
| Scottish Power                                 | 2                                      | Supplier, HHDC                    |
| Siemens  | 1                                      | HHDC                              |
| SMS PLC  | 5                                      | HHDC, HHDA, MOA, NHHDC, NHHDA     |
| SSE Energy Supply Limited                      | 1                                      | Supplier                          |
| TMA Data Management Ltd                        | 4                                      | HHDC, HHDA, NHHDC, NHHDA          |
| Utilita Energy LTD                             | 1                                      | Supplier                          |

## Summary of Consultation Responses

| Respondent                | Agree? | Impacted? | Costs? | Impl. Date? |
|---------------------------|--------|-----------|--------|-------------|
| Drax                      | ✓      | ✓         | ✓      | ✓           |
| IMServ                    | ✓      | ✓         | ✓      | ✓           |
| Scottish Power            | ✓      | ✓         | ✗      | ✓           |
| Siemens                   | ✓      | ✓         | ✓      | ✓           |
| SMS PLC                   | ✗      | ✓         | ✓      | ✗           |
| SSE Energy Supply Limited | ✓      | ✓         | ✓      | ✓           |
| TMA Data Management Ltd   | ✓      | ✗         | ✗      | ✓           |
| Utilita Energy LTD        | ✓      | ✓         | ✗      | ✓           |

# Question 1: Do you agree with the CP1541 proposed solution?

## Summary

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

## Responses

| Respondent                | Response        | Rationale  |
|---------------------------|-----------------|--|
| Drax                      | Yes             | We support the proposed solution which looks to follow a similar process to that used in the NHH sector, for which the NHHDC can send a D0004 (Notification of Failure to Obtain Reading) to the Supplier, rather than being reliant upon non-prescribed bilateral discussions between HHDCs and Suppliers. Although a HHDC is expected, in most circumstances, to remotely dial a meter to obtain consumption data and pass it back to the Supplier, if they can't obtain this data remotely, resulting in the need for a Site Visit to obtain the data manually, there's currently no prescribed mechanism for HHDCs to inform Suppliers via a dataflow if they've been unable to manually retrieve consumption data where a Site Visit has been arranged. |
| IMServ                    | Conditional Yes | IMServ already use the D0004 to report upon unsuccessful Site Visits in the HHDC market. The flow is concise, providing all of the information needed to fulfil 4.1.8 of BSCP502: 'The HHDC shall ensure that where a site visit was not possible, the reasons are explained sufficiently such that appropriate action can be taken to improve the chances of securing a successful site visit'.   |
| Scottish Power            | Yes             |  |
| Siemens                   | Yes             | It would be beneficial to all parties to have a standardised process to advise of failure to capture a meter reading from a manual download.   |
| SMS PLC                   | No              | We see the merits of formalising the approach, however, we believe that continuing in the same way that we are, has the same outcome for the same amount of manual work in completing either the D0004 or a report to be issued to the Suppliers, without the adjustment to systems and processes.   |
| SSE Energy Supply Limited | Yes             | We believe the solution will improve the quality of Suppliers' data  |

| <b>Respondent</b>       | <b>Response</b> | <b>Rationale</b>   |
|-------------------------|-----------------|--|
| TMA Data Management Ltd | Yes             | This makes sense and brings HH visits in line with NHH visits.   |
| Utilita Energy LTD      | Yes             | We agree with the proposal to receive a D0004 from a HHDC when the Half Hourly data failed to download. This will align HH with the current Non-Half Hourly process and deliver a stronger standardised solution, whilst having minimal impact on current systems. |

## Question 2: Do you agree that the draft redlining delivers the CP1541 proposed solution?

### Summary

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

### Responses

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

| Respondent     | Response        | Rationale  |
|----------------|-----------------|--|
| Drax           | Yes             |  |
| IMServ         | No              | <p>The redline draft for section 3.4.1.4 states 'If unable to obtain Meter reading, the HHDC will inform the Supplier and await further instructions'.</p> <p>This infers that any attempt at future visits should stop until instructed by the supplier. There are various scenarios in which the DC can independently progress the issue at site without needing assistance from the supplier. Awaiting instruction would create unnecessary delays in situations where the supplier does not and cannot take any action to assist. This would have a significant impact on our Site Visits processes and demand fast action from suppliers to stop performance being affected.</p> <p>There is no reference in the problem statement regarding any issues post notification; the issue is solely with the inconsistent approach in terms of communications and the potential for no communications.</p> <p>IMServ recommends the statement should be amended to state say 'If unable to obtain Meter reading, the HHDC will inform the Supplier'. This being the intention of the CP.</p> |
| Scottish Power | Yes             |  |
| Siemens        | Conditional Yes | Beneficial to all involved parties to add a formal process that a D0004 is required to be issued where   |

| Respondent                | Response | Rationale  |
|---------------------------|----------|--|
|                           |          | <p>there has been a failure to capture a meter reading via a manual download.</p> <p>However, it is stated that the supplier would provide "further instruction" to the HHDC, but it is not stated how this instruction will be relayed. Is it expected that the supplier will provide a D0005, in which case Section 3.4.1.7 could be expanded or a new section added for this purpose?</p> <p>Or is it expected that there will be an informal instruction provided by the supplier?</p> |
| SMS PLC                   | Yes      |  |
| SSE Energy Supply Limited | Yes      |  |
| TMA Data Management Ltd   | Yes      |  |
| Utilita Energy LTD        | Yes      |  |

## Question 3: Will CP1541 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7   | 1  | 0                  | 0     |

### Responses

| Respondent     | Response | Rationale  |
|----------------|----------|--|
| Drax           | Yes      | CP1541 will have a positive impact upon us as Supplier because having a consistent process with an industry data flow should improve operational efficiency and data provision. We believe it provides a more robust solution than being reliant upon informal bilateral communication. From an implementation perspective, this should be a relatively straightforward change as it effectively seeks to replicate the existing NHH process. Testing may be required to ensure that systems can successfully receive incoming D0004 flows from HHDCs. |
| IMServ         | Yes      | The change is minimal for IMServ. When a D0135 or D0136 is triggered by a Site Visit we do not currently send a D0004. The D0135/D0136 serves as notification of a failed visit. We will need to change our process to ensure D0004s are also sent in this scenario, which will entail software development, changes to work instructions and training.  |
| Scottish Power | Yes      | This will be a positive impact, as will receive information from HHDC's regarding failed visits which will help inform next steps and provide insight in to issues preventing downloads and therefore potential improve performance.   |
| Siemens        | Yes      | Development will be required to update and align how our DC system processes manual download outcomes to ensure a D0004 is sent in all required circumstances whilst not impacting current messaging such as the D0001 in the case of faulty assets.   |
| SMS PLC        | Yes      | As HHDC we will be affected by this change; we will be required to make changes to our systems and processes to account for issuing out the D0004s rather than a report directly to the supplier. On first review this will not be a small change to implement.  |

| <b>Respondent</b>         | <b>Response</b> | <b>Rationale</b>   |
|---------------------------|-----------------|--|
| SSE Energy Supply Limited | Yes             | We believe there will be minor impacts on our organisation as a result of this change.   |
| TMA Data Management Ltd   | No              | As an organisation we already send D0004s to some Suppliers, this process will just be extended to all Suppliers.  |
| Utilita Energy LTD        | Yes             | We expect minimal impact as this process will mirror the existing system solution for NHH. There will however be some small system and process changes made to monitor and report on failures to gather reads. |



## Question 4: Will your organisation incur any costs in implementing CP1541?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5   | 3  | 0                  | 0     |

### Responses

| Respondent                | Response | Rationale  |
|---------------------------|----------|--|
| Drax                      | Yes      | In line with our response to Q3, although this should be a relatively straightforward change, testing may be required to ensure that systems can successfully receive incoming D0004 flows from HHDCs. |
| IMServ                    | Yes      | We have estimated the cost of software development, changes to work instructions and training to be 3 days of effort. This will be a one-off cost.   |
| Scottish Power            | No       |  |
| Siemens                   | Yes      | There will be a moderate cost incurred for the development and test of the changes to our DC system to accommodate the update. This would be a one off cost.   |
| SMS PLC                   | Yes      | One-off costs of process and system updates.<br>On-going costs of managing the D0004 process.  |
| SSE Energy Supply Limited | Yes      | We do not believe either the one-off or ongoing costs of implementing this change will be significant.   |
| TMA Data Management Ltd   | No       |  |
| Utilita Energy LTD        | No       |  |

## Question 5: Do you agree with the proposed implementation approach for CP1541?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 7   | 1  | 0                  | 0     |

### Responses

| Respondent                | Response | Rationale  |
|---------------------------|----------|--|
| Drax                      | Yes      | From decision date of the Authority, we would support at least six months implementation lead time, and have the expectation that the first available release would be 4th November 2021. A decision by May 2021 would enable a minimum of six months to implement this change by the November 2021 release. |
| IMServ                    | Yes      | The change is minimal for IMServ. This is achievable within the timescale proposed.  |
| Scottish Power            | Yes      | SP agrees with November 2021 implementation  |
| Siemens                   | Yes      | Given the relatively short development / test period required, the November release date is achievable.  |
| SMS PLC                   | No       | Six months will not be enough time to complete the system changes and testing required to successfully implement CP1541, our preference would for it to be implemented in February 2022.   |
| SSE Energy Supply Limited | Yes      | We believe the implementation date provides parties with sufficient time to make the necessary changes.  |
| TMA Data Management Ltd   | Yes      | Yes as stated above we are already sending these flows to a number of Suppliers.   |
| Utilita Energy LTD        | Yes      | We agree with the approach to implement this change by the November 2021   |

## Question 6: Do you have any further comments on CP1541?

### Summary

| Yes | No |
|-----|----|
| 1   | 7  |

### Responses

| Respondent                | Response | Comments  |
|---------------------------|----------|---|
| Drax                      | Yes      | The J0012 'Additional Information' field is currently an Optional field. If completion of this field by the NHHDC and HHDC was made mandatory it could provide valuable Site Visit information to the Supplier. For example, if access to a particular site was not possible because the front gate was padlocked the Supplier may consider alternative options for obtaining the read. |
| IMServ                    | No       |   |
| Scottish Power            | No       |   |
| Siemens                   | No       |   |
| SMS PLC                   | No       |   |
| SSE Energy Supply Limited | No       |   |
| TMA Data Management Ltd   | No       |   |
| Utilita Energy LTD        | No       |   |

**BSCP502**

| <b>Respondent</b> | <b>Location</b> | <b>Comment</b>              |
|-------------------|-----------------|-----------------------------|
| IMServ            | 3.4.1.4         | See response to question 2. |