

CP Consultation Responses

CP1543 'Use of DTC dataflow D0051 in the Half Hourly sector'



The second CP Consultation was issued on 12 July 2021 as part of the July CPC batch, with responses invited by 6 August 2021.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
IMServ	3	HHDA, HHDC, MOA
Scottish Power	1	Supplier Agent (not stated)
Siemens MAS	1	Supplier Agent (not stated)
SSE Energy Supply Limited	1	Supplier
Stark	4	HHDA, HHDC, NHHDA, NHHDC
TMA Data Management Ltd	4	HHDA, HHDC, NHHDA, NHHDC

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
IMServ	x	✓	✓	x
Scottish Power	✓	✓	✓	✓
Siemens MAS	x	✓	✓	✓
SSE Energy Supply Limited	✓	x	x	✓
Stark	x	✓	✓	x
TMA Data Management Ltd	✓	✓	✓	✓

Question 1: Do you agree with the CP1543 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	3	0	0

Responses

Respondent	Response	Rationale
IMServ	No	<p>Although we currently issue D0051s and believe we are already compliant with this CP, we do not agree in mandating the sending of this flow. The HHDC already provides a mandatory D0012, which tells the Supplier the initial read frequency, so why is the Method required? The D0268 always includes the Retrieval Method, which is already provided to the Supplier by the HHMO.</p> <p>The CP states <i>'Without receipt of a D0051, Suppliers are reliant on informal methods of communication to understand if a Meter can be dialled remotely or not'</i>. The CP also states that this <i>'will ensure Suppliers are aware of how consumption data is retrieved'</i>.</p> <p>The D0051 will only reflect a snapshot of the Comms Method as this is taken from the initial D0268. Until the DC attempts to dial the meter they will not know if the meter can be dialled successfully remotely or not. A remote method may initially work for a time and then stop working. The proposed D0051 process will not reflect this update</p> <p>If the aim is to improve HH performance, analysis of D0268, D0001 and D0004 is likely to give a significantly better outcome.</p> <p>We are also uncomfortable with the words in the CP "By putting an obligation on the HHDC to confirm the Retrieval Method this would obligate the HHDC to obtain reads or give the Supplier notification they can't do it." This seems to indicate that the CP is seeking to ensure the HHDC performs the collection activity itself and goes beyond just issuing the D0051 therefore the wording should be amended to more accurately describe solely the issuing of the D0051, this being the objective of the CP.</p>
Scottish Power	Yes	

Respondent	Response	Rationale
Siemens MAS	No	Although it is recognised that clarification on the provision of the D0051 is required and that it should be sent following the receipt of the D0268 we do not agree that the suggested solution is the most efficient approach. It is our understanding that the provision of the D0051 is only necessary where the Retrieval Method is unknown at appointment or where there is inconsistency between the information provided on the appointment flow and the information provided on Meter Technical Details. This is described further in our response to Q2.
SSE Energy Supply Limited	Yes	Changing the trigger for sending the D0051 to the receipt of the D0268 has allayed our concerns over accuracy of the data within the D0051.
Stark	No	<p>In our response to the first consultation, we indicated that as an HHDC we used D0051 flows, on receipt of the D0268 flow, coincident with the return of the D0012, to acknowledge receipt of MTD, even though it was not in BSCP502.</p> <p>The solution suggests that the D0051 would obligate the HHDC to obtain reads or give the Supplier notification they are unable, however by accepting the appointment the HHDC already has this obligation under BSC rules.</p> <p>The limited nature of Valid set for retrieval method data item J0098 means that this would not fulfil the expectations of the proposer.</p> <p>Suppliers receive the same MTD as the HHDC from the MOA, i.e., communication method data item J0386.</p> <p>The proposed solution in this second consultation could also result in an excess number of the D0051 flows which would nullify any potential useful information Supplier might hope to obtain from their receipt.</p> <p>Supplier would also receive notification of any comms faults affecting remote collection by other D-Flows and reporting.</p>
TMA Data Management Ltd	Yes	We agree with the proposed solution, it makes sense to link to the MTDs so that new D0051s are sent when the site details change.

Question 2: Do you agree that the draft redlining delivers the CP CP1543 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	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
IMServ	No	<p>The redlined CP states the D0051 will be sent 'within 5 WD of receipt of the Half Hourly Meter Technical Details'. This is only achievable if the D0268 is valid. If the D0268 is not valid we shall reject the flow and send a D0001 stating such. The redlining could state 'within 5 WD of receipt of the valid Half Hourly Meter Technical Details'.</p> <p>Please see also the comments in Q1 regarding the need to reword a phrase to prevent unintended scope creep and to better clarify the specific requirements being placed on the Agent.</p>
Scottish Power	Yes	
Siemens MAS	No	<p>The process begins with the receipt of the D0155. The D0155 contains the data item "Retrieval Method" which is an obligatory item on the flow. Following acceptance of the appointment and the provision of agent details the Meter Operator will send Meter Technical Details (D0268) to the HHDC. The D0268 includes the Effective from Settlement Date {MSMTD} and the Communications Method. Siemens believe that it is the information from these two fields that should determine whether there is a need to provide a D0051 to the Supplier. Where the Comms Method contradicts the Retrieval Method held from the D0155 or the Retrieval Method is unknown then the D0051 should be sent by the HHDC with the information held on the D0268. Should the Comms Method subsequently change and contradict the held Retrieval Method then a revised D0051 should be sent by the HHDC. This would require HHDCs to set up a mapping between Retrieval Method and Comms Method and only provide the D0051 where there is a change.</p>

Respondent	Response	Rationale
		Irrespective of the above Siemens also question the provision of the D0051 when there is a CoS – No Meter scenario as Outstation Details are not provided on the D0268 and information provided on the D0051 we believe would not assist the Supplier.
SSE Energy Supply Limited	Yes	
Stark	No	<p>As in our response to the first consultation, we indicated that as an HHDC we used D0051 flows, on receipt of the D0268 flow, coincident with the return of the D0012, to acknowledge receipt of MTD, even though it was not in BSCP502.</p> <p>The second draft redlining that updated clauses registration clauses i.e., 3.2.1.3, 3.2.4.4, 3.2.7.5, 3.3.1.2 had some merit however did not reconcile the benefit to the addition of the “within 5wd” timeline.</p> <p>The remaining new clauses we consider to be an excess, for as previously stated the Supplier also receives the D0268 flow & there is no direct mechanism between the D0268 & the D0051 to provide the Supplier with any useful information.</p> <p>The additional clauses could create an unnecessarily large number of additional D-flows which may well not be wanted or used by all Suppliers.</p>
TMA Data Management Ltd	Yes	

Question 3: Will CP CP1543 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	The use of the D0051 is already established. Some minor changes and monitoring will need to be added to ensure flows are always sent within new parameters.
Scottish Power	Yes	We will be required to undertake minor IT changes to ensure that this change. An initial review of the changes has been conducted ahead of an full Impact Assessment and has confirmed a low impact that can be delivered ahead of the proposed implementation date.
Siemens MAS	Yes	There is currently a discrepancy in the number of D0268s received and the number of D0051s sent as not all received D0268s significantly impact upon information previously provided. If we follow the proposed BSCP we will need to amend our systems to accommodate the requirement to send a D0051 following a D0268 receipt in all circumstances. Siemens will also need to make changes to systems if the suggested approach outlined in our response to Q2 is adopted but this would be our preference.
SSE Energy Supply Limited	No	Implementation of CP1543 will have no direct impact on SSE as a Supplier, but it will allow us the opportunity of reporting on the flow in future.
Stark	Yes	The proposed second redlining would require some additional code changes to HHDC systems to facilitate with subsequent resource requirements. The potential increase in the number of D-flows would see an increase DTN volume & subsequent costs, which we could not see justified, especially at a time where more significant changes are on the horizon.
TMA Data Management Ltd	Yes	Some minor system changes will be required to ensure that D0051 flows are sent in all the required circumstances.

Question 4: Will your organisation incur any costs in implementing CP CP1543?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
IMServ	Yes	Based on the above assumptions we think little or no cost
Scottish Power	Yes	There will there will a small development cost for the IT changes.
Siemens MAS	Yes	There will be costs associated with making the system changes as described in the response to Question 3.
SSE Energy Supply Limited	No	
Stark	Yes	As in Question 3
TMA Data Management Ltd	Yes	Yes small development and testing cost.

Question 5: Do you agree with the proposed implementation approach for CP CP1543?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

Responses

Respondent	Response	Rationale
IMServ	No	Stated above
Scottish Power	Yes	
Siemens MAS	Yes	We believe the changes proposed and the suggested alternative outlined in our response to Q2 can be accommodated in the proposed implementation approach.
SSE Energy Supply Limited	Yes	
Stark	No	We do not agree that CP1543 should be implemented with this proposal for the reasons previously stated.
TMA Data Management Ltd	Yes	

Question 6: Do you have any further comments on CP CP1543?

Summary

Yes	No
0	6

Responses

Respondent	Response	Comments
IMServ	No	
Scottish Power	No	
Siemens MAS	No	
SSE Energy Supply Limited	No	
Stark	No	
TMA Data Management Ltd	No	

BSCP502

Respondent	Location	Comment