

CP Consultation Responses



CP1546 'Introducing DTC flows to transfer UMS Summary Inventories and Control files'

This 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 |
|--|--|------------------------------|
| C&C Group | 1 | Provider of Systems to UMSOs |
| Northern Powergrid | 1 | Distributor |
| Power Data Associates Ltd | 1 | PDAL Meter Administrator |
| Scottish and Southern Electricity Networks | 1 | Distributor |
| Scottish Power Energy Networks | 1 | Distributor |
| SSE Energy Supply Limited | 1 | Supplier |
| Tym Huckin Ltd | 1 | MA |
| UK Power Networks | 3 | Distributor(s) |

Summary of Consultation Responses

| Respondent | Agree? | Impacted? | Costs? | Impl. Date? |
|--|--------|-----------|--------|-------------|
| C&C Group | ✓ | ✓ | ✓ | ✗ |
| Northern Powergrid | ✓ | ✓ | ✓ | ✗ |
| Power Data Associates Ltd | ✓ | ✓ | ✓ | ✓ |
| Scottish and Southern Electricity Networks | ✓ | ✓ | ✓ | ✗ |
| Scottish Power Energy Networks | ✓ | ✓ | ✓ | ✗ |
| SSE Energy Supply Limited | ✓ | ✗ | ✗ | ✓ |
| Tym Huckin Ltd | ✓ | ✓ | ✗ | ✓ |
| UK Power Networks | ✓ | ✓ | ✓ | ✗ |

Question 1: Do you agree with the CP1546 proposed solution?

Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 8 | 0 | 0 | 0 |

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| C&C Group | Yes | We agree with the introduction of the new DTN flows to pass CMS Control file and Summary Inventory information to the MA (UMSDS). This formalises the email data transfer which was always subject to interpretation. |
| Northern Powergrid | Yes | We agree with the proposed solution and the benefits it sets out to achieve. |
| Power Data Associates Ltd | Yes | Yes, we fully support the need to use the DTS to transmit files as opposed to the email solution currently in place. We are receiving multiple emails a day which require manual processing. In implementing this change now it improves the resilience of the data exchange. This process can be implemented ahead of the proposed MHHS changes with NHH MPIDs transitioning to HH, and the increased quantity of inventory submission this will bring to us as Meter Administrator. Given the proposals for all MPIDs to migrate from October 2023, this DTS process is required to allow the Meter Administrator to automate much of the inventory loading process and respond to the UMISO accordingly. |
| Scottish and Southern Electricity Networks | Yes | SSEN agree that the introduction of new DTN flows. |
| Scottish Power Energy Networks | Yes | We welcome the introduction of standard industry flows for the provision of the Summary Inventory and CMS control file to the MA (and response). This will provide a consistent methodology in inventory processing and allow a more stream-lined process that will limit manual effort. |
| SSE Energy Supply Limited | Yes | |
| Tym Huckin Ltd | Yes | This process will help automate a lot of the tasks currently carried out manually for MAs, though we |

| Respondent | Response | Rationale |
|-------------------|----------|---|
| | | have already automated the majority of the import process. Given the increase in number of files being sent, use of the DTN will provide a more robust channel than emails and allow for complete automation. |
| UK Power Networks | Yes | This is a process improvement providing greater efficiencies, timeliness and improved ease of monitoring. |

Question 2: Do you agree that the draft redlining delivers the CP1546 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 |
|--|----------|--|
| C&C Group | Yes/No | Yes largely, though we have provided comments below seeking clarification of a number of points. |
| Northern Powergrid | Yes | |
| Power Data Associates Ltd | Yes | Yes it does, however we've listed a few minor suggested changes to the wording in the BSCP520 for a few sections to help clarify. |
| Scottish and Southern Electricity Networks | Yes | No further comments. |
| Scottish Power Energy Networks | No | We believe that at a high level the draft redlining delivers the intent. However, there are several areas that have been queried by our system service provider for clarity (included in their own response). We would not sign off on the solution until the detail of these outstanding queries are resolved and we have confidence that all parties' interpretation is aligned. |
| SSE Energy Supply Limited | Yes | |
| Tym Huckin Ltd | Yes | |
| UK Power Networks | Yes | Our reading of the redlined text suggest that the changes would deliver the intended effect. |

Question 3: Will CP1546 impact your organisation?

Summary

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

Responses

| Respondent | Response | Rationale |
|---------------------------|----------|---|
| C&C Group | Yes | <p>Our existing LOCUS system (for UMS management) will need to be altered to provide and accept the DTN flows.</p> <p>We don't believe (given current market programmes such as Faster Switching – which may even be proposing a change freeze (not sure of the scope of that)) that this would be possible to achieve for Feb 2022. A more realistic target date would be May for example.</p> <p>If you are proposing a soft adoption where parties can move to the DTN flows (from Feb 2022) when they are ready to, then that's would be acceptable (but presumably then you'd need to specify by when all parties must have transitioned).</p> |
| Northern Powergrid | Yes | <p>In our role of UMSO, our unmetered supplies system will require changes.</p> <p>Our Service Provider will need to develop and test the system changes.</p> <p>We will need to test the release including interfacing internal systems, such as MPAS, Data Transfer Network (DTN) routings etc.</p> <p>Operational processes and routines will need to be adapted to support the implementation of the new data flows.</p> |
| Power Data Associates Ltd | Yes | <p>As Meter Administrator – our Equivalent Meter will require an update in order to be able to read and process and generate the new flows. We are already carrying out the work to design and develop this, will which be completed in the next few months. We will then ahead of the implementation date carry out testing with some or all of the UMSOs to ensure we are receiving and sending data accordingly.</p> |
| Scottish and Southern | Yes | <p>SSEN would need to initially engage with our external system provider, then carry out testing to</p> |

| Respondent | Response | Rationale |
|--------------------------------|----------|--|
| Electricity Networks | | ensure inventory updates and any resulting flows can be generated or received through the DTN. There would be monetary costs involved with regards to engaging with our system provider and SSEN feel that it is unlikely that we could ensure a go live date of Feb 2022. |
| Scottish Power Energy Networks | Yes | <p>It is not clear if this change is intended to be applied utilising a 'big bang' approach. I am assuming not as the draft changed to BCSP 520 still retain the text 'Electronic or other agreed method'</p> <p>As an UMSO the impacts on us are as follows:</p> <ul style="list-style-type: none"> Engage system provider to develop changes to incorporate the new flows and relevant system process and validation Internal development of new interface infrastructure for new flows Receive updated product and carry out internal testing Update training documents Roll out training to BAU team and IT Support <p>As a DNO this falls in the middle of the anticipated Change Freeze for Faster Switching, and while ongoing testing is being undertaken by the DNO community.</p> |
| SSE Energy Supply Limited | No | |
| Tym Huckin Ltd | Yes | We will need to revise our DTN gatekeeper to process the incoming flows. We will also need to adapt the automated processing system already in place to send acceptance/rejection flows back via the gatekeeper. |
| UK Power Networks | Yes | <p>We are materially impacted under the UMSO role. UMSO IT system changes will be significant, especially as there will be a need to implement the mandatory changes described in the CP to create and process the Dataflows.</p> <p>At present, the sending of summary inventories and control files is a manual process which enables us to intervene where the OID permits charge code and switch regime validity to be both Yes or No, e.g.</p> |

| Respondent | Response | Rationale |
|------------|----------|--|
| | | <p>equipment trials. In order to codify this process of sending Dataflows it would be preferable if the OID did not allow such ambiguity of validity and found an alternate way of dealing with these trials and exceptions.</p> <p>There will need to be agreement and close cooperation between the parties on developing test method / schedule / implementation.</p> |

Question 4: Will your organisation incur any costs in implementing CP1546?

Summary

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

Responses

| Respondent | Response | Rationale |
|--|----------|---|
| C&C Group | Yes | <p>We will incur costs in developing and testing the changes to our LOCUS UMS system and in installing this for UMSOs.</p> <p>There would additionally be testing costs for any of our customers.</p> |
| Northern Powergrid | Yes | <p>In addition to our service provider development costs we will need to pay for implementation of the release in to our test and live environments, changes to DTN routings and User Acceptance Testing (UAT).</p> |
| Power Data Associates Ltd | Yes | <p>One off cost will be incurred through the design work to make changes to the Equivalent Meter. Changes will be made to our operational procedures and quality systems too. Testing will be carried out ahead of the implementation date so the costs of the time and effort in liaising with some or all of the UMSOs.</p> <p>Ongoing costs will be to pay the DTN charges for sending flows, but these costs will be insignificant.</p> |
| Scottish and Southern Electricity Networks | Yes | <p>One-off development and testing costs would be applicable to implement the change required within our systems.</p> |
| Scottish Power Energy Networks | Yes | <p>We will incur costs in terms of testing, implementation and training out of an updated version of our current system. We may also require the build and test new interfaces to manage the new flows within our internal architecture.</p> |
| SSE Energy Supply Limited | No | |
| Tym Huckin Ltd | No | |

| Respondent | Response | Rationale |
|-------------------|-----------------|---|
| UK Power Networks | Yes | There will be system development costs to send, receive and process the new flows. Project / testing resource Ongoing DTN use costs. |

Question 5: Do you agree with the proposed implementation approach for CP1546?

Summary

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

Responses

| Respondent | Response | Rationale |
|--|----------|--|
| C&C Group | No | <p>It is not clear whether this is a mandatory switch to DTN flows, or could be adopted at some point after Feb 2022.</p> <p>If there isn't a market wide big-bang adoption date, systems would need to support both the existing CMS Control file/Summary Inventory file AND the new DTN flows simultaneously and I suspect the MA would specify which method they can support?</p> <p>We are very concerned with the challenging timescale if this is a big bang approach.</p> |
| Northern Powergrid | No | <p>Our service provider does not believe they can meet the February 2022 implementation date.</p> <p>In addition, we have resources focussed on delivering changes to support the Faster Switching programme and could not meet a June release.</p> <p>We would therefore suggest that a November 2022 implementation is more appropriate/achievable which would still implement the data flows in advance of MHHS.</p> |
| Power Data Associates Ltd | Yes | <p>Implementation will be comfortable for February 2022, and we are fully supportive of this proposed date.</p> |
| Scottish and Southern Electricity Networks | No | <p>SSEN considers a go live date of Feb 2022 to be challenging given the development and testing required. Although we note within the revised BSCP520 that existing email arrangements will remain in place between UMSO and MA.</p> |
| Scottish Power Energy Networks | No | <p>We do not believe that an implementation date of Feb 2022 as a timescale is enough to develop and fully test the functionality required. There is also an anticipated Change Freeze instigated by the Faster Switching Programme that may have an adverse impact.</p> |

| Respondent | Response | Rationale |
|---------------------------|-----------------|---|
| SSE Energy Supply Limited | Yes | |
| Tym Huckin Ltd | Yes | |
| UK Power Networks | No | The proposed timeline is short when we consider the necessary system changes that are required. We propose that the implementation date is moved to be no earlier than the June BSC change implementation date. |

Question 6: Do you have any further comments on CP1546?

Summary

| Yes | No |
|-----|----|
| 5 | 3 |

Responses

| Respondent | Response | Comments |
|--|----------|--|
| C&C Group | Yes | In redlined text section |
| Northern Powergrid | Yes | Overall we are supportive of the change proposal and what it sets out to achieve however; the current implementation is not achievable given the activities already in progress in the industry. Our service provider requires a number of clarifications on the drafting which they have highlighted in their response. |
| Power Data Associates Ltd | No | |
| Scottish and Southern Electricity Networks | Yes | Consideration should be given as to how instances of historical inventory submissions that pre-date migration is processed and how energy consumption will be recalculated and submitted to the customer appointed energy supplier prior to the date of cut-over. SSEN would like to ensure that any revised inventory data that leads to several MA files being produced are released to the MA at the same time. In order to avoid the risk of any unnecessary recalculation of energy consumption or DUoS by either the customers appointed energy supplier or DNO. |
| Scottish Power Energy Networks | Yes | We would seek clarification if a 'big bang approach' is being suggested. We would also refer to the further comments provided by C&C, and although we have not re-stated them in this section, it is paramount that these clarification points are addressed to ensure that the ultimate delivery of this change is understood by all parties and delivered supporting the Change Proposal. |
| SSE Energy Supply Limited | No | |
| Tym Huckin Ltd | Yes | Although the accept/reject flows will be sent back to the UMSO via the DTN instead of the current email |

| Respondent | Response | Comments |
|-------------------|----------|--|
| | | process, we are obliged under BSCP520 to send a P0064 to the <u>customer</u> to show what has been imported. This is currently a spreadsheet. We presume this will continue under the requirements of BSCP520, but query how this will be applied to the MHHS transferees. Under MHHS the "customer" will be the supplier, not the lighting authority. Will we need to send "something" to the supplier as well? |
| UK Power Networks | No | |

BSCP520

| Respondent | Location | Comment |
|------------|---|---|
| C&C Group | 3.1 & 3.2 & 3.4 (e.g. 3.4.4/3.4.5) | Action columns need to be re-written to say 'send UMS Inventory' rather than using old language of CMS Control file/Summary Inventory file |
| C&C Group | 4.8.1 EFD | <p>More broadly, The Effective From Date used in the UMS Inventory Data Flow should be the later of</p> <ul style="list-style-type: none"> • The EFD of the Inventory • The market participants' registration to the MPAN <p>Otherwise it can't be used as intended to signify that the inventory has changed from a specified date.</p> <p>Alternatively could just make it the</p> <ul style="list-style-type: none"> • The EFD of the Inventory <p>and leave the MA to work out how that affects them? [however, your specified validation indicates that the MA must be the MA registered at the EFD so I can see you may want to keep as is]</p> <p>In any case, the definition of the EFD in the flow needs to reflect this use of MA registration date where that is later than the EFD of the inventory.</p> |
| C&C Group | 4.8.1 Sending a change of Inventory to all affected MAs | <p>In the event that a (e.g. backdated) change of inventory is made which effects more than one MA, should all affected MAs receive the UMS Inventory flow. Presumably yes.</p> <p>Presumably each MA which has been responsible for the MPAN on or since the EFD of the Inventory change (including any MA which is known to be to commencing in the future) should receive the UMS Inventory flow and the EFD in the flow should be as per comment above.</p> |
| C&C Group | 4.8.1 EFD | <p>Only one overall EFD is provided in the UMS Inventory flow</p> <p>Currently it is possible for each SubMeter to have its own EFD, e.g. you indicate in BSCP520 1.2.5.7 that MA should record EFD input to the Equivalent Meter level.</p> <p>Similarly, a CMS control file is produced per SubMeter with its own specific EFD</p> |

| Respondent | Location | Comment |
|------------|---|--|
| | | <p>In the CMS Control file YYYYMMDD the effective from date will reflect the start date of the inventory change for the meter.</p> <p>Similarly we provide separate Summary Inventory files per non CMS Sub Meter with the effective from date of the meter's inventory in the filename.</p> <p>So our UMS solution provides the ability to manage SubMeter inventory independently whilst still being able to provide an overall EFD for the MSID.</p> <p>Given all this, please consider also having EFDs at the Sub Meter level too in the DTN flow.</p> <p>That would provide the ability for an UMISO to show that one SubMeter's inventory has changed but another hasn't.</p> |
| C&C Group | Flow Definition (and BSCP520 generally) | <p>Should mCMS be treated the same as CMS? (e.g. when populating UMS Inventory flow)</p> <p>The CMS Indicator Flag could potentially be used more profitably (and could be extended to other cases in future) e.g. to indicate</p> <p>N=Non CMS</p> <p>C=CMS</p> <p>M=mCMS</p> |
| C&C Group | 4.6.3.3 Grouping of Controllers | <p>When grouping the Controller Devices for CMS Inventory you now introduce the 'ControllerXX' string. This limits the number of distinct controller CCs to 99 which we would have to manage (however unlikely).</p> <p>What would we do if there were more than 99?</p> <p>Does this provide any real value to anyone given that the assignment of the number to a CC is arbitrary?</p> <p>We'd prefer to stick with the existing 'Control ' string.</p> |
| C&C Group | 4.8.2 CMS Unit Reference | <p>CMS Unit References are not supposed to start with H or T so that they are not confused with header and trailer records in the old CMS Control files.</p> <p>With the advent of the new DTN flows this limitation should be lifted.</p> |

| Respondent | Location | Comment |
|------------------------------|---------------------------------|---|
| C&C Group | 4.8.1 Inventory Sequence | <p>Inventory Sequence Numbers – The introduction of sequence numbers is often problematic.</p> <p>We presume that the MA is not</p> <ul style="list-style-type: none"> expecting to receive contiguous sequence numbers (sequential with no gaps in the sequence) per MPAN or to expect the first UMS Inventory file that they receive for an MPAN to be 1 (a different MA may have received the first iteration). <p>As a UMS system provider our inclination is to generate the number from a site-wide sequence number rather than a number tied to the MPAN / MA / Inventory EFD change iteration, so that we have the freedom to re-send a file (which failed at the MA) with a higher sequence number without having to change the inventory version artificially.</p> <p>Given that we might choose to implement that way, could the Integer be extended to INT(8) please.</p> |
| C&C Group | Flow Data Item Definition | <p>Number of items – is INT(6)</p> <p>Could we increase to INT(8) here just to future proof.</p> |
| C&C Group | 1.2.5.1 | <p>'Sub-Meters for CMS equipment are denoted in lower case, non-CMS are denoted in upper case'.</p> <p>We have not seen or are aware this sort of case specific rule anywhere else in the industry. Is this important?</p> |
| C&C Group | Flow Data Item Definition | <p>Currently the CMS (GP4) and Non CMS(GP3) sections of the UMS Inventory flow are mandatory. (1-*)</p> <p>If we are setting the inventory to zero there won't be any rows to provide so these need to be optional. (0-*) and this case should be described in the flow definition.</p> |
| Power Data Associates Ltd | 1.2.5.1 | <p>"A Sub-Meter must be unique with an MSID."</p> <p>This is aiming to advise that where an individual MSID has multiple agreed Sub-Meters, then they need to be unique within that MSID. The same Sub-Meter value could be used against different MSIDs. This could be mis-interpreted, so we suggest changing this sentence to read:</p> |

| Respondent | Location | Comment |
|---------------------------|----------|---|
| | | "Each Sub-Meter must be unique within an MSID." |
| Power Data Associates Ltd | 3.1.13 | Add a footnote to this section, along the lines of: "Please refer to section 4.8.1 for additional rules around when the UMSO can send this flow, relating to the Effective From date of the inventory." |
| Power Data Associates Ltd | 3.2.3 | As per our note for 3.1.13 |
| Power Data Associates Ltd | 3.2.4 | As there are now more reasons the MA may reject the UMS Inventory DXXXX Flow, change the statement which says the reasons for rejection are down to Charge Codes and/or Switch Regimes as follows: "Reject updated Summary Inventory and/or CMS Control File (as appropriate), listing invalid Charge Codes and/or Switch Regimes to the UMSO and continue to use or re-apply previous Summary Inventory and/or CMS Control File (as appropriate)." to: "Reject updated Summary Inventory and/or CMS Control File (as appropriate), listing invalid Charge Codes and/or Switch Regimes to the UMSO and/or reasons as detailed in section 4.8.2." |
| Power Data Associates Ltd | 4.8.2 | "If any of the initial checks fail, then the Instruction Sequence Number will be marked for rejection, see Section 4.8.3." This is a typo, and should read as Inventory Sequence Number (not Instruction), so: "If any of the initial checks fail, then the Inventory Sequence Number will be marked for rejection, see Section 4.8.3." |