TOM Transition approach
Siemens response to the consultation
12 July 2019

1.Provide clarity over the scope of the Market-wide Data Service (MDS)

Siemens is concerned that the Transition Approach Consultation makes no statement on the scope of Market-wide Data Services (MDS) as part of the BSC Central Settlement Services remit. Our understanding is that it will focus purely on centralised data aggregation services and a data lake. However, in the past, we have seen and heard suggestions of centrally provided visualisation services, data analytics services and the provision of micro services.

Siemens is firmly of the opinion that timely and cost-effective innovation in data services is best delivered in a competitive market. Whilst we recognise that the industry is yet to progress through a phase of detailed design, we believe that Elexon should make a clear statement on the scope for the Market-wide Data Services in order to provide a clear signal to an industry considering the implications of the transition to a new Target Operating Model. Siemens would also like the Energy Data Taskforce principle of freely available data applied to the data lake, assuming it doesn't breach GDPR

2.Behind the meter as a distinct competitively procured service

Siemens has already articulated the importance in ensuring that mechanisms are in place for competitive provision of behind the meter services in the future. Whilst we recognise that there are parallel works going on right now to consider these behind the meter assets, we believe that they should be acknowledged explicitly as part of any future Target Operating Model and defined as competitively provided services feeding into Central Settlement.

3.Maintain qualification obligations for the Processing Service Smart (PSS) Provider

Siemens has genuine concerns relating to the proposed demotion of responsibility for Processing Service Providers (PSPs). Processing Services like these are currently delivered through the HHDC and NHHDC roles, which must adhere to strict standards under the BSC and are audited accordingly. Siemens believes that the PSP should maintain a qualified role to ensure clear accountability for data quality going into Central Settlement and also to allow flexibility in delivery models. Such flexibility would not be possible through a single Smart Data Service (SDS) provider role, where the remit is primarily governance focused, as opposed to the PSS who has ultimate responsibility for data quality into settlement.

4.Clarifying DA run-off

Siemens is concerned with the transition to MHHS and the runoff of DA (both HHDA and NHHDA). It is not clear if the current DAs will have to continue to operate for the Settlement Dates before their mpans were migrated to a central data aggregation service. If this is the case, then DAs would need to continue to operate until after the DF run date (for the last Settlement Date they were appointed to) has been passed. Assuming that this Settlement is done under the existing timetable, then this will last for 26 months after the last Settlement Date. Who would be paying for this service?

Furthermore, DCs will still have to send delayed reads to these DAs for dates prior to migration to the centralised DA. Has the Working Group gone into this level of detail? and What other potential 'gotchas' are there in detail of the transition approach?

From the weekly monitoring of HHDA data files over the last two+ years we have noticed a regular pattern (at least one per month in our sampling) of late HHDA appointments being received from the MPAS where the dataflow is received after the R3 run has been done for the mpan. This late appointment could be due to the supplier not sending the details to the MPAS at the correct time. With the proposed change

to the Settlement timetable these delayed appointments would be after the RF run and could well be after DF and the end of the disputes period. This wouldn't impact us, but would impact the central DA and probably result in an increase in Trading Disputes even if the threshold value is raised.

5.HHDA Inclusion

There is reference to the HHDA playing a significant role in the transition arrangements including processing unmetered consumption at a Wh level which, although not stated, would presumably be processed via the D0379/D0380 data flows. For many HHDAs this would require a change to current systems for a temporary arrangement for a system that would subsequently be retired. Additionally, the reliance on the HHDA to process significant additional numbers of advanced meters that are currently settled in the NHH space prior to their transition to the new arrangements may also have an impact on DA costs. It should also be recognised that HHDA customer costs tend to be significantly greater than NHHDA customer costs.

Any impact on future non-participating services such as the DA must be kept to a minimum and should be avoided during the transition stages.

6.Transition and the use of Elective services

Although in broad agreement with the transition arrangements, noting the above with reference to the role of the HHDA, it is difficult to confirm its practical implementation without reference to a timeline of activities. What would be particularly helpful is to consider the move to the TOM alongside other significant industry initiatives including Faster Switching, Meter Splitting and the shorter Settlement timescales. In understanding the timeline, the use of Elective Half Hourly (possibly revised to address current known problems), as an interim option to avoid breaching transition principles (e) an (f) and at the same time providing customers with early benefits of a Smart Metering solution, could be a practical and cost-efficient model.

7.Meter Data Retriever (MDR) Role

Siemens believes that the creation of an MDR based DCC role is a positive step however we would make the following points:

- The DUIS articles associated with the MDR role need to be carefully consulted on prior to MDR role creation, so as not to create the same lack of functionality issues seen in today's 'Other' user and 'RSA' user role.
- Siemens also believe that a new role should be created to allow current Meter Operators and future Metering Service (Smart) (MSS) and Metering Service (Advanced) (MSA) to complete install & maintenance services on SMETS2 meters without the support of a supplier through access to the DCC and supporting DUIS articles. While we acknowledge that this would represent granting access to a larger number of articles, it would be beneficial. We believe that it would be sensible to keep the MDR and Install roles separate as not to increase the complexity of each role.

8.Retaining Advanced Meters

Page 27 refers of the DWG transition consultation document refers to discussion on the advanced market segment and states: "Agreed that, while the transition approach is based on adopting / migrating all existing Advanced Meters, the expectation is that in the target end state only current transformer (CT) metered sites will have an Advanced meter on an enduring basis".

Siemens sees no reason why this should be the case and no justification for WC meters to not remain as Advanced in the Industrial and Commercial market. More often than not, larger industrial and commercial clients will have a proportion of their estate metered using WC metering; applying the statement above

would mean that I&C clients would need to acquire multiple services and it would remove their right of choice to metering types. We would appreciate a better understanding of the rationale behind this statement as it would seem to imply a bias towards SMETS2 meters.