CP1526 'Introduction of Service Level Agreements for rectifying Meter faults'

This CP Consultation was issued on 13 January 2020 as part of CPC00801, with responses invited by 7 February 2020.

Consultation Respondents

Respondent	Role(s) Represented
British Gas	Supplier
E.ON	Supplier, Supplier Agent
EDF Energy	MOA
ESP	Distributor
IMServ	MOA, DC
Northern Powergrid	Distributor
npower	Supplier, Supplier Agent
Scottish Power	Supplier, MOA, HHDC
Siemens	MOA, HHDC
SmartestEnergy	Supplier
SMS	MOA, HHDC
SSE	Supplier
Stark	HHDC, HHDA, NHHDC, NHHDA
TMA Data Management	HHDC, HHDA, NHHDC, NHHDA
UKPN	Distributor
WPD	Distributor, MOA

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✖	✓	✓	✓
E.ON	✓	✓	✓	✓
EDF Energy	✓	✓	✓	✓
ESP	✓	✓	✖	✓
IMServ	✖	✓	✓	✓
Northern Powergrid	✖	-	-	✓
npower	✖	✓	-	✖
Scottish Power	✖	✓	✓	✖
Siemens	✓	✓	✓	✓
SmartestEnergy	✓	✓	✖	✓
SMS	✓	✓	✓	✓
SSE	✓	✖	✓	✓
Stark	✓	✓	✖	✓
TMA Data Management	✓	✓	✓	✓
UKPN	✖	✓	-	✖
WPD	✓	✓	✓	✖

Question 1: Do you agree with the CP1526 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
10	6	0	0

Responses

Respondent	Response	Rationale
British Gas	No	British Gas is of the view that the proposals dilutes the existing obligations to resolve faults in a timely manner and would have an adverse impact on performance levels at earlier settlement runs (ie SF and R1).
E.ON	Yes	We agree with the proposed solution defined under CP 1526, this sets more realistic measures and clearly defines responsibilities in the resolution of metering faults and defines a more realistic SLAs that parties should achieve.
EDF Energy	Yes	Better provision for complicated no access sites and other such longer term issues
ESP	Yes	New obligations on Parties require defined service levels in order to achieve the CP's intent – a streamlined and effective fault resolution process. Additionally, efficiency in metering fault resolution timescales reduces the negative impact on the end consumer and improves the accuracy of data entering Settlement.
IMServ	No	As a MOA, the SLAs are linked to CP1524 & CP1525 which are HH only – From a HH MOP point of view we are happy with SLAs proposed, however because we believe that CP1524 & CP1525 should apply to both HH & NHH this means that CP1526 is missing NHH SLAs. As a DC, although we agree that to date performance targets have not been met and it is unrealistic to fix all faults by WD+15, we do not agree that a target of less than 100% should be set. Such targets: Encourage the wrong type of behaviour; and Diminish the ability of the Supplier to meet their SF and R1 performance levels. For example if the 1% unresolved related to large consumption sites, it may be impossible for percentage energy to reach 99% at SF or 99.5% at R1.

Respondent	Response	Rationale
		A target of 100% could be tied to the Settlement timetable so at R2 or R3 perhaps. Where it is truly not possible to rectify a fault, then perhaps the Supplier could seek derogation against that metering system, similar to that used where a Metering System does not comply with the required CoP.
Northern Powergrid	No	As the Change Proposal acknowledges that the SLA for LDSO rectification of CT metering equipment faults is not based on any definitive evidence, we believe the SLA should reflect the current DCUSA SLA for reporting them via the D0135 dataflow (as a code B12) as per the MOCOPA guidance for service termination issue reporting. Therefore, the SLA should be the fault rectified within 40 WD on 90% of occasions (not on 97% of occasions as per the draft).
npower	No	We understand the logic behind the proposed increase of timescales as it benefits the MOA for resolving the fault rectifications however we feel that this may cause a potential risk that instead of looking to resolve faults in 15 days, the full proposed period is utilised, therefore increasing settlement impact. Keeping to 15WDs ensures that the mop work on these as soon as they are received back as incomplete. Equally a small % of faults may relate to a much larger % of settlement impact, on which suppliers are monitored against. It was stated in the proposal that MOAs can be found resending flows just to hit the BSC obligations, so will this not just push the goal posts out further to do the same and so doesn't necessarily fix the route cause? We believe that further workgroup discussion to develop alternative options may be beneficial to the outcome.
Scottish Power	No	No, we do not agree with the proposed solution as we believe that there should be a clear definition for 'complete required work' that will be reported. There are uncontrolled instances where a job could not be completed and will be reported as a failure within the service level targets. An example being where the MOA has received and scheduled a job but, the MOA has not been able to complete the required work due to not gaining access to the site
Siemens	Yes	No comments
SmartestEnergy	Yes mainly	It could be argued that these SLAs might conflict with agent contracts but we think that this would be good to help create an industry standard.

Respondent	Response	Rationale
		However, we feel the service levels should be slightly tighter. We propose an additional one at 10WD on 90%. There is also the small matter which P332 is grappling with viz that there needs to be an incentive for any of this to have any meaning.
SMS	Yes	We support the principle to improve resolution timescales that impact provision of customer data. There are a number of examples where the full resolution is not within the control of the Agent or LDSO and we need to consider how these can be managed.
SSE	Yes	No comments
Stark	Yes	No comments
TMA	Yes	No comment
UKPN	No	There is already a performance standard for LDSO rectification of faults Section 30.5 of the Distribution Connection and Use of System Code (DCUSA) "Dangerous Incidents and Damage". This is 90% within 40 working days. Having two different performance standard under two different codes for the same activity is nonsensical. Further, the proposed performance standard of 97% within 40 working days is a material and unjustified enhancement to the that already in place.
WPD	Yes	We agree with the CP1526 proposed solution.

Question 2: Do you agree with the proposal to take a percentage based approach to compliance?

Summary

Yes	No	Neutral/No Comment	Other
13	2	0	1

Responses

Respondent	Response	Rationale
British Gas	No	We are of the view that the current obligations are appropriate and would recommend that the Performance Assurance Framework continues to adopt a more risk based approach to governance.
E.ON	Yes	E.ON believes the existing SLA's are unrealistic and unfairly prescribes 100% of faults are resolved by the MOA within 15 workings is simply not achievable. We support the proposed solution as it offers some room for complicated faults that take longer to resolve. We also support the solutions by placing responsibility on the right party responsible for the resolution of metering system faults within the compliance measure.
EDF Energy	Yes	No issues
ESP	Yes	This CP aligns the BSC Procedures with the percentage-based approach for resolving asset condition irregularities defined in the DCUSA.
IMServ	Yes	Yes as MOP we are happy with this approach As a DC, we do not agree a performance level less than 100% is acceptable, however we do agree with a percentage based approach.
Northern Powergrid	Yes	No comments
npower	No	A percentage based approach could ensure MOAs act more correctly but if they are unable to get communications working or access to a site for example, then they still need to escalate to a supplier. We therefore disagree on the basis that we should have sufficient time to resolve the faults or at least escalate to the relevant parties involved to assist a speedy resolution.

Respondent	Response	Rationale
Scottish Power	Yes	In relation to CP1526, we agree in principal that a percentage based approach to compliance could be considered for suppliers. However, an approach should be based on uncontrolled reasons to completing a job – e.g. access to site not being provided to the supplier (where the supplier can demonstrate that the job was scheduled and site attended) - not being included as failure reasons.
Siemens	Yes	This is a pragmatic solution to the realities of fault resolution. The percentages and timescales for the different roles (MOA and LDSO) should be reviewed after an appropriate of time and amended if required.
SmartestEnergy	Yes and No	We agree with the overall intent of a percentage-based approach given that 100% compliance is unrealistic. However, we are concerned that this metric is measured on MPAN counts and not on volumes. The risk to settlement (and to suppliers) is directly proportionate to the volumes of missing data.
SMS	Yes	*CONFIDENTIAL RESPONSE*
SSE	Yes	No comments
Stark	Yes	It is encouraging to get the MOA to complete the fault investigation with clear timeline set in the SLA. We understand that this CP may be reviewed in the future if there is new evidence to support a change is required.
TMA	Yes	We are fully supportive of a percentage based approach to ensure that more complex issues which might take longer to fix, do not cause non compliance.
UKPN	Yes	Principle is OK but values are not.
WPD	Yes	No comments

Question 3: Do you agree that the draft redlining delivers the CP1525 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
11	1	3	1

Responses

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

Respondent	Response	Rationale
British Gas	Yes	British Gas is of the view that the proposed redlining is reasonable. However, do not support the solution proposed in its current format.
E.ON	Yes	No Comments
EDF Energy	No	In relation to faults that are raised to LDSO; see comments below
ESP	Yes	No comments
IMServ	Yes and No	As a MOA, yes. We recognise that the current D0001/D0002 process makes tracking fault performance very difficult, currently there is a serious lack of transparency and the new flows seek to resolve this. If parties have concerns regarding the SLAs we would propose a review after 12 months, it should then be possible to use the improved quality information gathered to document the true (real world) fault resolution timescales. As a DC, No. It is unclear how the performance against service levels would be calculated and who is doing the calculation. Please can you confirm the following: Under 10.2.1, in the case where a fault wholly rests with the MOA, the HHDC will measure the number of working days between the issue of the DAXYX and receipt of the DAXYY. Where the fault was passed to a DNO for a period, then this period would be deducted from the above. For example, DAXYX issued Working Day 1, DAXYY returned Working Day 20 but fault referred to DNO for 5 WD, then the fault was open with the MOA for 15 WD yes?

Respondent	Response	Rationale
		This implies the Party performing the calculation has to have visibility of all the flows required by the calculation, is this the case? Similarly, under 10.2.2 the calculation is based on the time between DNO receiving a DAXYZ from the Supplier to the DNO returning a DAXYZ to the Supplier? This implies the Supplier is doing this reporting? Also, what would happen to open faults during the cut-over period?
Northern Powergrid	N/A	No comments
npower	No comment	No comments
Scottish Power	N/A	Not applicable as per our previous response
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	No comments
SSE	Yes	No comments
Stark	Yes	BSCP502 section 10.2 shows clear SLA requirement.
TMA	Yes	No comments
UKPN	Yes	Our reading of the text suggests that the changes would deliver the intended effect – but we don't agree with that effect.
WPD	Yes	Yes, however we question why the new section has been referenced as "10.2" in BSCP502? This does not follow numerically with the previous sections.

Question 4: Will CP1525 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
14	1	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Please refer to question 5.
E.ON	Yes	The systems and process change costs have been captured as per the response to Q5 under CP 1524.
EDF Energy	Yes	-Review and potentially amend our grey IT.
ESP	Yes	This CP has minor impact on ESPE as we, for the foreseeable future, do not currently own metering equipment. However, ESPE will implement the changes to processes outlined in our response for CP1525 and ensure service levels are defined and recorded in said processes to support the SLAs introduced by this CP.
IMServ	Yes	As a MOA, iIt's a significant change to current working practices As a DC, this change will require: Development Training Updated working instructions
Northern Powergrid	No comment	No comments
npower	Yes	Process and document changes
Scottish Power	Yes	This change would result I significant and unnecessary changes to both processes and systems. In addition there would be significant changes to align internal documentation, as well as time developing and delivery training requirements.
Siemens	Yes	Amend and implement new version of reports to monitor Fault resolution progress to achieve SLA requirements for MOA role.
SmartestEnergy	Yes	We should see an improvement in transparency and the quality of data as a result of this modification.
SMS	Yes	*CONFIDENTIAL RESPONSE*

Respondent	Response	Rationale
SSE	No	No comments
Stark	Yes	DC would hope to see an improvement in the fault resolution timeline from MOA an LDSO.
TMA	Yes	Systems and procedures will be affected
UKPN	Yes	To meet the higher performance standard would require the accelerated use on a case by case basis of powers of entry and/or additional out of hours working to undertake repairs at time that met customer requirements and/or legal impose additional costs to meet that standard.
WPD	Yes	The introduction of the expected SLAs will involve additional process and monitoring procedures.

Question 5: Will your organisation incur any costs in implementing CP1525?

Summary

Yes	No	Neutral/No Comment	Other
10	3	2	1

Responses

Respondent	Response	Rationale
British Gas	Yes	Based on the evidence to date, that costs will be incurred to ensure: We have the functionality to send/receive the proposed new flows; Internal business readiness activities are planned and implemented to inform impacted resource of the changes to the communication methods in the fault rectification process; Appointed/impacted agents are engaged; Management reporting developed to track fault performance based on new metrics. It is envisaged that the costs listed would be a one off, however the reporting suite would be subject to review. These relate to CPs 1524 and 1525 which are key dependencies for this change.
E.ON	Yes	as per the response to Q5 under CP 1524.
EDF Energy	Yes	An estimated £80k one-off costs for the system changes, plus £8k pa ongoing, with a caveat of +/-25%. This is a grand total inclusive of all CP1524, CP1525, and CP1526.
ESP	No	No comments
IMServ	Yes	As a MOA, cost will be bundled into one CP1524, CP1525 & CP1526. As a DC there will be relatively small one off cost.
Northern Powergrid	No comments	No comments
npower	No comment	TBC
Scottish Power	Yes	The significant changes to systems and process will incur costs. These costs will only be determined by a full IT impact assessment but would be estimated to be a

Respondent	Response	Rationale
		medium or high change. There will also be costs in support of training development and delivery.
Siemens	Yes	No comments
SmartestEnergy	No	No comments
SMS	Yes	There will be costs for system changes and for the resources needed to implement processes to implement CP1526.
SSE	Yes	Additional processes will be required to manage the new incoming flows and ensure the outgoing flows can be assigned unique reference numbers. This will likely require automation of these processes as numbers of HH supplies increase.
Stark	No	No comments
TMA	Yes	Medium cost
UKPN	N/A	*CONFIDENTIAL RESPONSE*
WPD	Yes	The introduction of the expected SLA's will involve additional process and monitoring procedures. This will have a costs implication to our organisation.

Question 6: Do you agree with the proposed implementation approach for CP1525?

Summary

Yes	No	Neutral/No Comment	Other
12	4	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	British Gas is of the view that the proposed implementation approach is reasonable. However, do not support the solution proposed in its current format.
E.ON	Yes	No Comments
EDF Energy	Yes	No issues
ESP	Yes	A big bang approach ensures consistency across Parties during implementation.
IMServ	Yes	We are concerned there is no cut over plan
Northern Powergrid	Yes	No comments
npower	No	We do not think that the approach being proposed is the only option.
Scottish Power	No	We propose that the implementation approach takes into consideration and aligns with next year's Faster Switching implementation range with a November 2021 implementation.
Siemens	Yes	No comments
SmartestEnergy	Yes	No comments
SMS	Yes	We agree with the implementation approach but think that the timescales involved are relatively short.
SSE	Yes	We agree with the proposed implementation in June 2021, to allow the associated Data transfer Catalogue CP and new data flows to be fully developed and implemented, and to align with implementation of CP1524 and CP1525.
Stark	Yes	No comments
TMA	Yes	No comments
UKPN	No	See above

Respondent	Response	Rationale
WPD	No	CP1526 is part of a suite of changes and we disagree with the implementation approach for the other two associated CP's on the grounds that without sight of the associated DTC data flows that will accompany these BSC changes we are unable to determine whether the implementation approach is achievable.

Question 7: Do you have any further comments on CP1525?

Summary

Yes	No
5	11

Responses

Respondent	Comments
E.ON	E.ON feels that the revised SLA's are a reasonable starting point to measuring the success of parties' overall ability to resolve faults in a defined SLA. The lack of clarity of completion/resolution of compliance against the existing measure under PARMs serial HM14, combined with no formal LDSO measure for metering system fault resolution makes it difficult to assess whether the initial % compliance measures are suitably aspirational. E.ON notes that the Settlement Risk 005 'A fault with SVA Metering Equipment is not resolved, such that metered data is recorded incorrectly or cannot be retrieved' and expects that Elexon and the PAB will monitor the measure and if necessary, make recommendations to change the SLA's as part of the Risk Operating Plan following implementation. We feel that the % compliance measure alone will not provide industry that the settlement risk is being mitigated on its own, for example today some MOA's close faults using the D0002' Fault Resolution Report or Request for Decision on Further Action' to inform parties that they are closing the fault, but the free text confirms that the fault is not actually rectified and is ongoing. This in turn counts as a completed fault resolution under the HM14 performance serial despite resolution not actually being completed. E.ON feels that the new fault resolution dataflows enables such instances to be spotted within the settlement risk monitoring, as such we recommend that the future ROP also reviews by fault reason category/type and looks for fault categories closed in unrealistically short timeframes as well as compliance against % measures as defined.
Scottish Power	We do not see how a reporting measure increases or decreases the risk to timely rectification of all faults, without more information on how the percentage will be measured and against which categories (i.e. uncontrolled reasons).
SmartestEnergy	We do have a slight concern that taking a percentage-based approach could increase the risk to the timely rectification of **all** faults. Perhaps a further backstop should be considered.
Stark	How does Elexon monitor the number of faults from MOA/LDSO to ensure the SLA % is accurately measured?

Respondent	Comments
	Would agent parties be notified if certain MOP/LDSO fail to meet the SLA?
WPD	We would have preferred to have reviewed this change alongside the proposed new DTC data flows to achieve a complete understanding of the whole process.

BSCP502

Respondent	Location	Comment
WPD	10.2	This reference does follow numerically with the previous sections.

BSCP514

Respondent	Location	Comment
EDF Energy	10.1.A	No specification given as to whether the DAXYX flow timeline is paused for MOA while open with LDSO – if no pause, MOA will always fail compliance regulations based on LDSO timeframes already being larger than the max MOA timeframe. Please specify in redlining a pause in the time count for MOA from the moment DAXYZ flow is sent from MOA to Supplier referring an LDSO fault, up to the point that MOA received the DAXYZ flow from supplier referring LDSO fault resolution complete to then un-pause the time count.

BSCP515

No comments received.