

4.7 Issue Form

Issue Form - BSCP40/04	Issue Number <i>(mandatory by BSCCo)</i>
<p>Issue Title <i>(Mandatory by originator)</i></p> <p>Removal of BSCP504 obligation on the NHHDC to visit de-energised sites once every 12 months.</p>	
<p>Issue Description <i>(Mandatory by originator)</i></p> <p>There is an obligation on Non Half Hourly Data Collectors (NHHDCs) to visit de-energised sites annually (footnote 99 from BSCP504 'Non Half Hourly Data collection for SVA Metering Systems Registered in SMRS'). Footnote 99 exists for the process whereby an NHHDC collects Meter register readings for designated Supplier Volume Allocation (SVA) Metering Systems either directly or via the Supplier, for which it must conduct a Site Visit. The footnote 99 provision exists within the BSC to ensure that, where sites are registered as de-energised, they do not have any Meter advances, to protect the integrity of Settlement.</p> <p>The footnote 99 provision leaves the NHHDC agents financially exposed in a scenario whereby the Supplier doesn't instruct the NHHDC to visit de-energised sites annually in line with BSCP504 provisions. However, if the NHHDC doesn't visit de-energised sites, even if financially exposed, the NHHDC is in breach of the BSCP504 provisions.</p> <p>Background</p> <p>Originally this obligation only applied to sites where no remote communication was available. The specific reference was removed by CP1019 'Clarification of Pre-Payment Meter reading Obligations' in 2005.</p> <p>More widely, the obligation for regular site visits was removed from the Supplier Licence obligations in 2016 by Ofgem as the Authority as other obligations, such as LC 21b.4 would prompt the Supplier to use a risk based approach to ensure that sites are visited regularly enough to avoid health and safety issues. However, it's unclear whether this License Condition applies to de-energised sites.</p>	

Justification for Examining Issue *(Mandatory by originator)*

In addition, the BSC Auditor raised the [Market Issue 5751](#), stating “We have identified several instances where Suppliers are not ensuring DC Agents are performing activities in line with the BSC. In particular, responsibilities between Data Retrievers and Data Collectors around visits to de-energised sites have not been clearly defined impacting processes such as Long Term Vacant.

Whilst non compliances were raised against the DC's, a root cause analysis (performed by the Auditor) showed that the DC's had not been instructed by the Supplier to perform these activities to meet obligations. As a result, there is a risk of potentially inaccurate data being used in Settlement.”

This is still a Market issue, however it has gone from medium to low risk for Suppliers and has remained medium for NHHDC.

Potential Solution(s) *(Optional by originator)*

TMA wishes for the Issue Group to discuss and make a recommendation on the following solution options:

- The removal of the obligation for NHHDCs (and any other Party) to visit de-energised sites on an annual basis from BSCP504; (This is TMA's preferred option).
- Clarifying the responsibility of the NHHDC visiting de-energised sites annually directly in BSCP504 table step 3.4.1.1; or
- The obligation for NHHDCs to visit de-energised sites to be placed instead on the Supplier of a Metering System.

Following Issue Group discussions, TMA would like a CP to be raised at the earliest opportunity.

Proposer's Details***Name***

Alexandra Pourcelot

Organisation

TMA Data Management Ltd

Email Address

alex.pourcelot@tma.co.uk

Telephone Number

+44 (0) 1324 711 744

Date

27 August 2019