

# Report Phase Consultation Responses



## P434 'Mandate to Half Hourly Settle the Non-Half Hourly Unmetered Supplies Metering Systems'

This Report Phase Consultation was issued on 14 October 2022, with responses invited by 28 October 2022.

### Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

### Consultation Respondents

| Respondent                             | Role(s) Represented        |
|--|----------------------------|
| Tym Huckin Ltd                         | MA/UMSDS                   |
| Northern Powergrid                     | Distributor                |
| ScottishPower                          | Supplier                   |
| IMServ                                 | Supplier Agent (HHDC/HHDA) |
| BUUK                                   | IDNO                       |
| National Grid Electricity Distribution | Distributor                |
| SSE Energy Supply Limited              | Supplier                   |
| Power Data Associates Ltd              | Supplier Agent (PDAL)      |

Question 1: Do you agree with the Panel's initial majority recommendation that P434 should be approved?

## Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6   | 1  | 0                  | 1     |

## Responses

| Respondent                             | Response | Rationale   |
|--|----------|---|
| Tym Huckin Ltd                         | Yes      | N/A   |
| Northern Powergrid                     | Yes      | N/A   |
| ScottishPower                          | Other    | ScottishPower agrees what the Modification seeks to achieve, however we do not agree that this should be mandated for parties. We fully support the data cleanse activities and welcome more engagement with the UMSO. The M11 milestone has a referenced target date of Oct 2024 but the replan now proposes Aug 2025.   |
| IMServ                                 | Yes      | This is a proactive approach.   |
| BUUK                                   | Yes      | We agree that P434 should be implemented with the intent of delivering MHHSP however we have concerns relating to the implementation process which we elaborate on in the response to question 7.   |
| National Grid Electricity Distribution | Yes      | Having listened to the proposed options for P434, the agreed approach outweighs the other existing option as the way best way forward.  |
| SSE Energy Supply Limited              | No       | We do not believe that the requirements contained within P434 should be developed outside of the MHHS Programme.  |
| Power Data Associates Ltd              | Yes      | <p>It de-risks the transition to MHHS</p> <p>The current MHHS transition plan does not address the effort required on the assumption that P434 will have happened</p> <p>It spreads the industry (and customer) effort and impact to resolve issues and to enable timely communication</p> <p>It allows the Data Cleanse activity to happen away from the time pressured activity of MHHS transition – helping to ensure the migration to MHHS isn't delayed by attempts to contact customers</p> |

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P434?

**Summary**

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

**Responses**

| Respondent                             | Response | Rationale   |
|--|----------|---|
| Tym Huckin Ltd                         | Yes      | N/A   |
| Northern Powergrid                     | Yes      | N/A   |
| ScottishPower                          | No       | N/A   |
| IMServ                                 | Yes      | N/A   |
| BUUK                                   | Yes      | N/A   |
| National Grid Electricity Distribution | Yes      | The redline changes will help to deliver the changes required with P434.  |
| SSE Energy Supply Limited              | Yes      | Whilst we do not agree that P434 should be implemented, if it is then we agree that the redlined changes to the BSC deliver its intent. |
| Power Data Associates Ltd              | Yes      | N/A   |

Question 3: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P434?

### Summary

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

### Responses

| Respondent                             | Response | Rationale   |
|--|----------|---|
| Tym Huckin Ltd                         | Yes      | N/A   |
| Northern Powergrid                     | Yes      | N/A   |
| ScottishPower                          | No       | N/A   |
| IMServ                                 | Yes      | N/A   |
| BUUK                                   | Yes      | N/A   |
| National Grid Electricity Distribution | Yes      | The redline changes will help to deliver the changes required with P434.  |
| SSE Energy Supply Limited              | Yes      | N/A   |
| Power Data Associates Ltd              | No       | The Report on Page 29 indicates that the submission of zero charge codes would achieve the same outcome of the D0139 – but the BSCP520 hasn't been updated to reflect that the UMSO would be required to send the zero charge code inventory in this scenario, so needs to be included. |

## Question 4: Do you agree with the Panel's recommended Implementation Date?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 5   | 2  | 0                  | 1     |

### Responses

| Respondent         | Response | Rationale  |
|--------------------|----------|--|
| Tym Huckin Ltd     | Yes      | N/A  |
| Northern Powergrid | Yes      | N/A  |
| ScottishPower      | Other    | The date stated in the Modification (M11) is currently under re-plan consultation and proposed to be the end of <b>August 2025</b> and not the Oct 2024 date in the consultation. The modification needs to align with the replan.   |
| IMServ             | No       | <p>We support the idea of pinning the P434 deliverables against the MHHS milestone plan.</p> <p>In key dates (based on current MHHS timetable) it states 'By Oct 2024 – complete NHH to HH CoMC for all UMS MSIDs as mandated by this Modification'.</p> <p>There is no key date that states when the CoMC activity can start. Based on the Implementation Date it can be inferred that '<b>5 WDs</b> after the authority decision is received' the process of transferring to HH can begin.</p> <p>The implementation plan does not make it clear when the BSCP502 change will come in to affect. The consultation states that the working group agreed that BSCP502 needed to include the optionality for Parties to send/process the D0379/D0380 from <b>October 2023</b>. However, I cannot see this date in the implementation plan or redline documents. The suggestion is that this also takes affect '<b>5 WDs</b> after the authority decision is received'. Participants will need sufficient time to make these changes, including system development work. Five Working Days will not sufficient.</p> <p>The key date of when the P434 CoMC activity can start and when the changes to BSCP502 are implemented should align.</p> |

| Respondent                             | Response | Rationale  |
|--|----------|--|
| BUUK                                   | Yes      | N/A  |
| National Grid Electricity Distribution | Yes      | N/A  |
| SSE Energy Supply Limited              | No       | We do not agree that P434 should be implemented.   |
| Power Data Associates Ltd              | Yes      | The date set is linked to the MHHS timetable. Ofgem last week sent a letter to industry reinforcing the need to progress with MHHS if possible to the timetable they published in Spring 2021. |

Question 5: Do you agree with the Panel's initial view that P434 should not be treated as a Self-Governance Modification?

### Summary

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

### Responses

| Respondent                             | Response | Rationale             |
|--|----------|-----------------------|
| Tym Huckin Ltd                         | Yes      | N/A                   |
| Northern Powergrid                     | Yes      | N/A                   |
| ScottishPower                          | Yes      | N/A                   |
| IMServ                                 | Yes      | N/A                   |
| BUUK                                   | Yes      | N/A                   |
| National Grid Electricity Distribution | Yes      | N/A                   |
| SSE Energy Supply Limited              | Yes      | N/A                   |
| Power Data Associates Ltd              | Yes      | It impacts customers. |

Question 6: Do you agree with the Panel's initial recommendation that P434 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

## Summary

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

## Responses

| Respondent                             | Response   | Rationale                            |
|--|------------|--------------------------------------|
| Tym Huckin Ltd                         | Yes        | N/A                                  |
| Northern Powergrid                     | Yes        | N/A                                  |
| ScottishPower                          | Yes        | N/A                                  |
| IMServ                                 | Yes        | N/A                                  |
| BUUK                                   | Yes        | N/A                                  |
| National Grid Electricity Distribution | Yes        | N/A                                  |
| SSE Energy Supply Limited              | Yes        | N/A                                  |
| Power Data Associates Ltd              | No Comment | Do not understand EBGL requirements. |

## Question 7: Do you have any further comments on P434?

### Summary

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

### Responses

| Respondent         | Response | Rationale   |               |                 |               |                 |               |                 |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
|--------------------|----------|---|---------------|-----------------|---------------|-----------------|---------------|-----------------|---------------|--|------------|--|----------|----------|-----------------|---------------|-----------------|---------------|-----------------|---------------|-----------------|---------------|------------|---|-----|-----|----|----|----|----|----|----|--------------|---|-----|----|-----|-----|----|----|----|----|------------|---|-----|----|-----|----|-----|-----|----|----|--------------|---|----|----|----|----|-----|----|-----|-----|
| Tym Huckin Ltd     | Yes      | With regards the redlining of BSCP520, this might be an opportune time to tighten up the wording of 3.2.5. We feel it should have the word in brackets added for clarity "Within 5 WD of receipt or by the EFD [whichever is the later date]."  |               |                 |               |                 |               |                 |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| Northern Powergrid | Yes      | Ref. 3.6.2.1, we believe the UMSO (rather than the Supplier) should lead on identifying which NHH MSID should be retained and CoMC'd. The UMSO is responsible for the co-ordination of the data cleanse and the contact with the customer and is in a better position to understand the data and what is required.  |               |                 |               |                 |               |                 |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| ScottishPower      | No       | N/A   |               |                 |               |                 |               |                 |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| IMServ             | No       | N/A   |               |                 |               |                 |               |                 |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| BUUK               | Yes      | <p>As the responsibility for change of measurement class is to remain with the supplier, we feel strongly that it is vital for a central migration plan to be agreed which all suppliers would need to adhere to. Specific areas to consider are the selection of the category of NHH MPAN to the inventory. Proposed approach sets out the prioritisation of which NHH traded Category MPAN that should be selected for the COMC. Having a set approach would allow UMSO system suppliers to code and would also allow for inventories to be changed back to NHH in the event that reverse migration is required due to the chosen supplier not yet trading on HH basis.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th></th> <th></th> <th colspan="2">Category A</th> <th colspan="2">Category B</th> <th colspan="2">Category C</th> <th colspan="2">Category D</th> </tr> <tr> <th>UMS Desc</th> <th>Category</th> <th>MPAN registered</th> <th>Used for COMC</th> </tr> </thead> <tbody> <tr> <td>Continuous</td> <td>A</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Dusk to Dawn</td> <td>B</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> </tr> <tr> <td>Half Night</td> <td>C</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> <td>No</td> <td>No</td> </tr> <tr> <td>Dawn to Dusk</td> <td>D</td> <td>No</td> <td>No</td> <td>No</td> <td>No</td> <td>Yes</td> <td>No</td> <td>Yes</td> <td>Yes</td> </tr> </tbody> </table> <p>Staggered migration of implementation via individual suppliers' timelines would be impossible to manage from a systems and process perspective. We feel individual Supplier plans would compromise</p> |               |                 | Category A    |                 | Category B    |                 | Category C    |  | Category D |  | UMS Desc | Category | MPAN registered | Used for COMC | Continuous | A | Yes | Yes | No | No | No | No | No | No | Dusk to Dawn | B | Yes | No | Yes | Yes | No | No | No | No | Half Night | C | Yes | No | Yes | No | Yes | Yes | No | No | Dawn to Dusk | D | No | No | No | No | Yes | No | Yes | Yes |
|                    |          | Category A  |               | Category B      |               | Category C      |               | Category D      |               |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| UMS Desc           | Category | MPAN registered   | Used for COMC | MPAN registered | Used for COMC | MPAN Registered | Used for COMC | MPAN registered | Used for COMC |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| Continuous         | A        | Yes   | Yes           | No              | No            | No              | No            | No              | No            |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| Dusk to Dawn       | B        | Yes   | No            | Yes             | Yes           | No              | No            | No              | No            |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| Half Night         | C        | Yes   | No            | Yes             | No            | Yes             | Yes           | No              | No            |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |
| Dawn to Dusk       | D        | No  | No            | No              | No            | Yes             | No            | Yes             | Yes           |  |            |  |          |          |                 |               |                 |               |                 |               |                 |               |            |   |     |     |    |    |    |    |    |    |              |   |     |    |     |     |    |    |    |    |            |   |     |    |     |    |     |     |    |    |              |   |    |    |    |    |     |    |     |     |

| Respondent                             | Response | Rationale  |
|--|----------|--|
|  |          | effective exchange of information across the affected parties.   |
| National Grid Electricity Distribution | No       | N/A  |
| SSE Energy Supply Limited              | Yes      | Whilst we agree with the intent of P434, we are of the strong opinion that the requirements within P434 should be progressed as part of the MHHS Programme and not under a standalone BSC modification.  |
| Power Data Associates Ltd              | Yes      | <p>The cost concerns raised in the previous consultation need to be balanced with the benefit of resolving issues ahead of the peak of activity during MHHS migration.</p> <p>Impact of BSC Settlement Risk – the existing NHH UMS MEM reporting is showing material error, and has done over several years, this would be removed with HH settlement.</p> <p>Impact of Modification &amp; consumer benefit – the MHHS SCR shows significant customer/industry benefit to HH settlement. P434 will provide the benefit of accurate HH settlement a year earlier for NHH UMS.</p> |