CP Assessment Report

CP1515 'Meter Operator Agents to send Metering System Data to SMRS instead of ECOES for the Faster Switching Programme'

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1515 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 2 April 2019. The SVG will consider the proposed solution and the responses received to the both CP Consultations before making a decision on whether to approve CP1515.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to both CP Consultations.
- Attachment(s) A and B contain(s) the proposed redlined changes to deliver the CP1515 solution.
- Attachment C contains the full responses received to the first CP Consultation, along with ELEXON's actions in respect of the comments.
- Attachment D contains the full responses received to the second CP Consultation, along with ELEXON's actions in respect of the comments.

Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

27 June 2019 (June 2019 BSC Release)

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- Attachment E contains the CP1515 Proposal Form.

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1 Why Change?

What is the issue?

Stage 0 of Ofgem's Faster Switching Programme requires that the Metering Point Administration Services (MPAS)[1] become the main repository of all Metering System Data from 27 June 2019.

Meter Operator Agents (MOAs) are currently required to send Metering System Data directly to the Electricity Central Online Enquiry Service (ECOES) platform using the Data Transfer Catalogue (DTC) Data Flow D0312 'Notification of Meter Information to ECOES'. In addition, MOAs are required to send the D0304 'Notification of Meter Asset Provider' to ECOES when they are notified of a change of Meter Asset Provider.

On 27 June 2019, the implementation date of DTC CCP 3554 'Update of Meter Details to MPAS' will redirect the D0312 and the D0304 to SMRSs, instead of to ECOES.

Balancing and Settlement Code Procedure BSCP514 'SVA Operations for Metering Systems Registered in SMRS,' currently requires MOAs to notify any changes to Metering System Data to ECOES, so must be amended to place the obligation on MOAs to send D0312 and D0304 Data Flows to SMRSs.

BSCP501 'Supplier Meter Registration Service' must also be amended to reflect that MOAs will be required to send D0312 and D0304 Data Flows to SMRSs.

Electricity Central Online Enquiry Service (ECOES)

ECOES is a market information system supporting the electricity customer transfer process in Great Britain. It mirrors information held in the SMRS.

Supplier Meter Registration Agent (SMRA)

SMRA means a Licensed Distribution System Operator acting in its capacity as the provider of a Supplier Meter Registration Service.

Supplier Meter Registration Service (SMRS)

Means the service provided to or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary point on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

Background

Ofgem's Faster Switching Programme

The current switching arrangements, developed in the late 1990s, are complex for Suppliers, which can lead to delays, errors and costs, which are often borne by consumers. Ofgem is taking steps to transform the current switching arrangements, and deliver faster, more reliable switching for consumers.

The delivery of the new switching arrangements will occur over multiple transitional stages. Each stage will require the development of new products and processes to support existing services within the GB energy retail market. Within each transition stage, data migration activities will be required between services to enable the operation of the new arrangements. The migration of data must be aligned to the development and implementation of new services in terms of functionality and interfaces.

Faster Switching Programme Stage 0 (pre-transition)

To support the delivery of the new faster Switching Arrangements an End-to-End (E2E) design has been produced by the Ofgem Switching Design Team. This is for Ofgem's Faster Switching Programme Stage 0, which is scheduled for implementation in June 2019. The stage requires that the CSS receive Meter information directly from SMRS. Since Meter information is not currently sent from MOAs to Supplier Meter Registration Agents (SMRAs), the implementation of CSS requires that the SMRA becomes responsible for

[1] MPAS is a Master Registration Agreement term; the BSC uses both 'SMRS' in BSCP501 and 'SMRA' in BSCP514 as equivalent terms to MPAS.

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being the central repository for Meter information, to enable data migration and enduring data feeds to CSS.

Ofgem published an open letter on 11 September 2018 encouraging Suppliers, Licensed Distribution System Operators (LDSOs), and other stakeholder's to support the FSEG. The purpose of the letter was to encourage stakeholders to ensure appropriate resource availability for the design, build, test phase of the Faster Switching Programme, such that they work with their agents such as MOAs to ensure the publication of accurate industry data on a timely basis.

DTC CP3554 'Update of Meter Details to MPAS'

On 7 November 2018, the Master Registration Agreement Service Company (MRASCo) Development Board (MDB) approved v2.0 of DTC CP3554 'Update of Meter Details to MPAS' for implementation on 27 June 2019. DTC CP3554 will provide the SMRSs with Meter information from MOAs. This will be achieved through amending the data items currently sent via the D0312 data flow, as set out in BSCP514 section 2.1.4, and the D0304 data flow.

DTC CP3554 will additionally reroute the D0312 and D0304 so that they go to SMRS, in place of ECOES. The SMRS will then forward all Meter Information that has passed validation to ECOES for publication.

Consequently, MOAs will be required to send Metering System data to the SMRA, who will validate the data before sending it to ECOES.

DTC CP3554 will introduce revised versions of the D0312 and D0304, as outlined below:

Meter Point Administration Service (MPAS)

MPAS is the MRA's equivalent of BSC's SMRS and SMRA.

Meter Operator

A Meter Operator is abbreviated to 'MOA' in BSC Code Subsidiary Documents and to 'MOP' in MRA Agreed Procedures

D0312 changes

- change the title of the D0312 DTC data flow from "Notification of Meter Information to ECOES" to "Notification of Meter Information to Meter Point Administration Service (MPAS)" and update the flow description;
- change the recipient of the D0312 to SMRA instead of ECOES, and introduce a 'response' D0312 flow from SMRA to MOAs and Suppliers following validation;
- introduce a new data item 'MOP Flow Response Code[2]' to allow SMRA to reject the D0312;
- add data item J0178 'Meter Operator ID' to the D0312 to allow the MOA to be identified; and
- amend the structure of the D0312 to incorporate the two additional data items to the D0312.

D0304 changes

- introduce a revised version of the D0304 "Notification of Meter Asset Provider" DTC data flow including a new data item 'MPAS D304 Response Code' to allow SMRA to reject the flow; and

[2] Please refer to DTC CP3554 v2.0 for details of the response values.

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- introduce new instances of the D0304 from Meter Operator to SMRSs and from SMRS back to the Meter Operator following validation.

DTC CP3554 and BSC CP1515

MOAs are not signatories to the MRA and therefore have no obligation to comply with the DTC change, so it is necessary that CP1515 be implemented to place the obligations on MOAs to comply with CP3554. Therefore, CP1515 and DTC CP3554 should be implemented together on 27 June 2019 to fully deliver the changes required for Ofgem's Faster Switching Programme Stage 0.

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2 Solution

CP1515 Proposed solution

The proposed solution for CP1515 seeks to amend BSCP501 'Supplier Meter Registration Service' and BSCP514 'SVA Meter Operations for Metering Systems registered in SMRS' to place obligations on MOAs to send the D0312 and D0304 DTC data flows to the SMRA instead of ECOES. It also mandates the SMRA to receive these flows, validate them and send response versions of the flows containing the appropriate response. The solution also mandates that MOAs have the ability to receive response flows from the SMRA, and subsequently action any D0304 or D0312 flows that contain a rejection code.

CP1515 proposes to amend BSCP514 to:

- Remove the requirement on MOAs to send D0312 data flows to ECOES;
- Add a new requirement on MOAs to send D0304 and D0312 data flows to the SMRAs;
- Add a new requirement on SMRA to validate D0304 and D0312 data flows received and to send a return D0312 data flow with the Response Code populated to MOAs and Suppliers, and to send a return D0304 data flow with the Response Code populated to MOAs;
- Add a new requirement on MOAs to action any D0304 or D0312 data flows rejected by the SMRA.

CP1515 proposes to amend BSCP501 to:

- Reflect that MOAs are required to send D0312 and D0304 data flows to the SMRAs and receive responses from the SMRAs using the same data flows.

Amendments following the first CP1515 consultation

Following the first CP1515 consultation, issued from 7 January to 1 February 2019, ELEXON made two changes to address comments received. As these changes constitute material amendment, CP1515 was re-issued for a second industry consultation period.

The intent of the solution for CP1515 remained unaffected by these amendments.

- The first amendment revised the response time for Meter Operators to send corrected details to SMRS following a rejection of D0312 or a D0304 flow. This was originally proposed as a two Working Day (WD) period. Following consultation responses, and after discussion with all bar one respondent, this been amended to "Where the MOA can resolve the issue without needing to consult other parties, and to use reasonable endeavours where they do need to consult with other parties".
- The second amendment clarified the processes added steps relating to the D0304 rejections.

These amendments were consulted upon as part of the second industry consultation, published between 1 March and 14 March 2019.

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Amendments following the second CP1515 consultation

Following the second CP1515 consultation no material changes to the solution were made. The second consultation highlighted further inconsistencies and clarification required in the redlining for BSCP514 and BSCP501. Further detail can be found in Section six, and Annex two of this paper.

Proposer's rationale

This change is required to mandate the revised usage of the D0312 and D0304, as amended by approved DTC CP3554, from June 2019 for Stage 0 of the Faster Switching Programme, as required by Ofgem.

Proposed redlining

Attachments A and B contain the proposed redlining to the BSCPs required to deliver the CP1515 solution.

Market participant responses to the first CP1515 consultation were split regarding the draft redlining. Five respondents agreed with the redlining, whilst five had concerns that CP1515 did not fully deliver the proposed solution. For more details on the Industry's views on the redlining and ELEXONs response please see Section six of this paper.

Since the first CP1515 consultation, ELEXON made two changes to the redlining, as described above, which rectify the concerns highlighted with the proposed redlining as part of the first CP1515 consultation.

Further amendments were made following the second CP1515 consultation, with further detail outlined in Section six of this paper.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1515 requires changes to two Code Subsidiary Documents (CSDs).

BSC Central Systems will not be impacted by the solution to this change.

Central Impacts	
Document Impacts	System Impacts
• BSCP501 • BSCP514	• No impacts

Central costs

The Central implementation costs for CP1515 will be approximately £360 to implement the necessary document changes.

BSC Party & Party Agent impacts and costs

Eight out of ten respondents to the first CP1515 consultation highlighted development costs for them to implement the CP1515 solution.

One respondent noted they would incur enduring costs from additional data flow Data Transfer Network (DTN) charges.

The majority of respondents, with one exception, highlighted they would incur system changes as a result of CP1515. One respondent expressed concern that the impacts on Suppliers had not been recognised. The respondent noted that the current drafting acknowledges Suppliers will receive the new version of the D0312 data flow, but the redlining does not provide clarity on what action a Supplier is expected to take. ELEXON discussed the concern with the respondent and clarified that they had been informed that MRASCo would be progressing revisions to an existing MRASCo Agreed Procedure ('MAP') and developing a new guidance document to provide clarity around Supplier processes relating to DTC CP3554 and CP1515.

Responses to the second CP1515 consultation regarding impacts and costs remained consistent with the responses received from the first consultation. Two new respondents both highlighted that in the CPs current form there is a risk that further development costs may be incurred once the required actions Suppliers need to take upon receipt of accepted or rejected D0312 flows have been clarified. ELEXON discussed this concern with both respondents and clarified that there would be no obligation on the Supplier, the obligation would be with the MOA. For further detail on this, please see Section six of this paper.

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[3]BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier Meter Registration Agent	To receive and validate the D0304 and D0312 data flows received from MOAs and to send response data flows.
Suppliers	To receive response D0312 data flows from SMRA.
Meter Operator Agents	To send the D0304 and D0312 data flows to the SMRA and to receive response data flows from the SMRA – and to action any rejections.

[3] A Guidance document has been produced, but no MAP changes were required.

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4 Implementation Approach

Proposed Implementation Date

The proposed Implementation Date for CP1515 is **27 June 2019** as part of **the June 2019 BSC Release**, to align with DTC CP3554 which will also be implemented on 27 June 2019.

The June 2019 BSC Release aligns with Ofgem's faster switching programme Stage 0 timeline and is therefore the most appropriate Release to include this CP. If CP1515 were not to be approved for implementation in June 2019, it will be necessary to change the implementation date for DTC CP3554.

Four of the ten respondents to the first CP1515 consultation did not agree with the proposed Implementation Date, commenting that there needed to be more analysis, and further discussion to develop the solution. This further discussion took place through a call including ELEXON representatives, Gemserv and consultation respondents.

ELEXON further contacted the four respondents to discuss their concerns. It was accepted by ELEXON and respondents that the Implementation Date for this change is timed to align with Ofgem's Faster Switching Programme.

Five out of eleven respondents to the second CP1515 consultation did not agree with the proposed Implementation Date. ELEXON contacted all market participants who did not agree with the proposed Implementation Date. These respondents unanimously highlighted they were not comfortable with the timescales, but unanimously agreed they could deliver within the timescales, in order to facilitate Stage 0 of Ofgem's Faster Switching Programme. Further details can be found in Section 6 of this paper.

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5 Initial Committee Views

SVG's initial views

CP1515 was presented to the SVG as a verbal update at its meeting on 8 January 2019. The SVG did not comment on CP1515, and noted that CP1515 had been raised and noted the proposed progression timetable.

Post meeting note: Please note that the proposed progression timetable changed after the SVG provided its initial views, due to CP1515 being issued for a second industry consultation. The CP1515 Assessment Report will therefore be presented to the SVG for decision at its meeting on 2 April 2019.

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6 Industry Views

First CP1515 Consultation

CP1515 was first issued for consultation on 7 January 2019, with a response deadline of 1 February 2019. This section summarises the responses received to the first CP1515 consultation (CP1515 v1.0). You can find the full responses in Attachment C.

Summary of CP1515 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1515 proposed solution?	5	5	0	0
Do you agree that the draft redlining delivers the intent of CP1515?	5	5	0	0
Will CP1515 impact your organisation?	9	1	0	0
Will your organisation incur any costs in implementing CP1515?	8	1	0	1
Do you agree with the proposed implementation approach for CP1515?	6	4	0	0
Do you have any further comments on CP1515?	6	4	0	0

Material amendments to CP1515

The responses received to the first CP1515 consultation highlighted changes required to the BSCP redlining. These changes amounted to being classed as material, as the proposed D0304 changes were incomplete.

Due to the solution being materially changed, under BSCP40 'Change Management' governance, CP1515 has been issued for a second 10 WD consultation.

Engagement with market participants

As there were significant comments regarding the redlining, ELEXON and Gemserv held a joint teleconference on 22 February 2019 to address concerns and achieve a consensus on how to resolve all issues. All those who responded to the CP1515 consultation were invited to join the call, and all bar one respondent participated. The main themes discussed included the key areas market participants highlighted as concerns as part of the first CP1515 consultation:

- The initially proposed two Working Days resolution timescale;
- General inconsistencies and clarification within the CP1515 solution;
- D0304 rejection code; and
- CP1515 Implementation timescales, given market participant impacts outlined as part of the first CP1515 consultation.

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Market participants on the call unanimously agreed that the updated CP1515 redlining would address concerns raised as part of the first CP1515 consultation, and agreed that they would be able to implement CP1515 if approved by the Supplier Volume Allocation Group (SVG) at its meeting on 2 April 2019, in time for the June 2019 BSC Release. One respondent highlighted that whilst all those on the call approved of the new changes, when presented to their wider business, there may be further comments to feedback, which could then be provided as part of this second CP1515 consultation.

Implementation Date

Six out of ten respondents agreed with the proposed Implementation Date as part of the first CP1515 consultation. One respondent commented that significant improvements and clarifications were required to the changes proposed and draft redlining, which will likely require some additional time to complete ahead of CP approval. Four respondents believed further analysis was needed and clarifications on the solution and the redlining are required. Following discussions on the teleconference, all participants agreed that they could deliver for the Implementation Date, if approved at the 2 April SVG.

We acknowledged that the need to re-consult due to material change will impact the timescales available for market participants to implement CP1515 between SVG approval and the Implementation Date. As noted in our further engagement with market participants, those market participants that responded to the first CP1515 consultation agreed that 27 June 2019 as part of the June 2019 BSC release remained appropriate, though they highlighted the shortened implementation timescales were not ideal. One respondent explicitly highlighted it would be preferable to have more time to implement, but recognised that it is important to align and support Ofgem's Faster Switching Programme (and not to delay it) and to align with DTC CP3554.

DTN interactions

One respondent was concerned that the proposed solution in CP1515 includes the requirement that 'accepted' D0312 response flows are sent to the Supplier as well as to the MOA. The respondent was concerned there would be no value to the Suppliers from receiving the 'accepted' flows, and there would need to be additional system changes required to filter out these flows. Furthermore, they noted there are applicable charges for flows sent over the DTN. Therefore, the respondents view is that the additional 'accepted' flows are not cost effective or efficient in their usage. They would also require system and business process solution in relatively short timescales to achieve June 2019 implementation.

Whilst we appreciate the respondents view, we note that the respondents view is out of scope for CP1515, as it is a DTC requirement introduced by DTC CP3554.

Consultation respondents comments on the redlining

Two Working Days Resolution Timescale

Three respondents questioned the proposed two WD resolution timescale if a D0312/D0304 flow is rejected. Respondents shared concerns that this would not be a sufficient timescale to respond to the rejection; meaning MOAs would be non-compliant under the BSC. One respondent noted that from the list of 20 D0312 response codes, most

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of the codes will never occur, or very rarely occur as their system has validation to prevent structural errors, for example: P Rejected - Meter ID is too long. As a result, the respondent identified the majority of rejections to be assigned to a small subset of codes, they predict the four most frequent rejection codes will be:

- 'C': Rejected - The MPAN is disconnected on date of meter work.
- 'I': Rejected - Sending MOP is not the appointed MOP on date of meter work or the current MOP
- 'J': Rejected - No MOP appointed to MPAN on date of meter work.
- 'M': Rejected - The Effective from Settlement Date {MSMTD} is prior to the previous Settlement Date {MSMTD} for this MPAN

The respondent commented that the proposed wording in BSCP514 suggests that the second D0312 a MOA sends will be different to the first, and therefore resolve the issue. However, the respondent clarified that in some cases the second D0312 will look the same as the first.

ELEXONs response and industry call

ELEXON contacted the respondents who raised concerns with the two WD resolution timescale. ELEXON proposed that the resolution timescale is extended to ten WDs. However, not all respondents agreed that a definitive timescale was appropriate, as the MOA could not necessarily resolve all rejections within a matter of ten Working Days. As a result, ELEXON proposed to amend the redlining to say "as soon as reasonably practicable". However, this was rejected at the industry teleconference (see below). ELEXON has added this as an additional question in the CP consultation.

This resolution time issue was discussed during the industry call. Attendees determined the following wording be clearer than "as soon as reasonably practicable" and therefore more appropriate for CP1515:

"Where the rejection is of a type the HHMOA can resolve, a revised D0312 shall be sent within 5 WDs. But, if it is necessary to involve other industry parties to resolve the issue, then the HHMOA shall use reasonable endeavours to get a revised D0312 sent as soon as possible"

The redlining has now been updated with this amendment.

D0304 Rejection Code

One respondent highlighted that whilst provisions had been made in BSCP514 regarding an MOA resending a D0312, no provision had been made in BSCP514 for the acceptance/ rejection of a D0304, and if rejected, there is no obligation on the MOA to resend a D0304.

ELEXONs response and industry call

ELEXON has updated the redlining, noting the amendment constitutes a material change. This second CP1515 consultation sought industry views on whether the new steps relating to D0304 rejections deliver the intention of CP1515. Respondents on the industry call unanimously agreed with the updates.

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General

Some respondents to the CP1515 consultation highlighted inconsistencies between BSCP501 and BSCP514. Respondents also requested that greater clarity was needed in the proposed redlining.

ELEXONs response and industry call

In response to the feedback we received through the CP1515 consultation, we have amended the redlining for BSCP514 and BSCP501. The amendments have addressed inconsistencies referred to in the first consultation, as well as clarification issues.

The table below summarises the specific comments from market participants on the CP1515 redlining, as well as ELEXONs response.

Issue	ELEXONs response
In BSCP501 where 3.2. a and b has been split, it is very clear, BSCP514 2.1.4 should be amended to replicate the layout of BSCP501	BSCP514 2.1.4 has been amended
Formatting of the redlining should be changed to provide clarity.	The redlining has been amended, through highlighting wording to indicate what has changed
BSCP514 section 2.1.4 e, 'and the supplier' should be removed.	The redlining has been amended

Second CP1515 Consultation

CP1515 was issued for a secondary industry consultation on 01 March 2019, with a response deadline of 14 March 2019.

This section summarises the responses received to the second CP1515 consultation. You can find the full responses in Attachment D.

Two market participants who responded to the first CP1515 consultation responded to the second consultation. However, those that did not respond to the second consultation highlighted in their response to the first consultation that they agreed with the solution, redlining and Implementation Date.

Summary of the second CP1515 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1515 updated solution following the first CP consultation?	9	2	0	0

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Summary of the second CP1515 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree that the updated draft v0.2 redlining as part of this second CP1515 consultation delivers the CP1515 proposed solution?	5	6	0	0
Will CP1515 impact your organisation?	10	1	0	0
Will your organisation incur any costs in implementing CP1515?	9	1	0	1
Do you agree with the proposed implementation approach for CP1515?	6	5	0	0
Do you agree with the revised response time following rejection of a D0312 or a D0304 flow?	9	0	2	0
Do you have any further comments on the updated CP1515 being consulted on as part of this second consultation?	2	9	0	0

Comments on the second CP1515 Consultation

There were 11 respondents to the second CP consultation. The majority of respondents (all bar two) agreed with the updated solution following the first CP consultation. Market participants noted that the amendments made since the first consultation were positive, but there were still concerns regarding the redlining, details of which can be found below. Two respondents disagreed with the solution in relation to receiving notification of a D0312 rejected flow, as explained below. ELEXON contacted both of the respondents that highlighted this issue. After clarification both respondents confirmed that they were comfortable with the updated solution.

Six respondents highlighted issues with the redlining, however these issues have since been resolved. The concerns from market participants were further clarification issues regarding the process steps, as well as clarification on obligations. ELEXON subsequently made amendments to the redlining, reflecting concerns that were highlighted during the second CP1515 consultation.

Responses to the impacts and costs arising from the CP1515 solution remained consistent with responses received in the first CP1515 consultation.

Market participants unanimously agreed with the revised response time following a rejection of a D0312 or a D0304 flow.

Receiving notification of a D0312 rejection flow

Two Suppliers highlighted the same concern as each other in their response forms regarding the receipt of a D0312 rejection flow. ELEXON confirmed with each respondent there will be no obligation on the Supplier after receiving notification of a D0312 rejection flow, as the obligation to resolve the matter is on the MOA.ELEXON since received an

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email from the two Suppliers confirming that they agree with the updated CP1515 solution following the second CP consultation.

Similarly, one Supplier noted that since the first consultation, FSEG have confirmed that an MRA MAP will not be created to obligate a Supplier to take action with the D0312. This confirmation means that their previous concern, around additional Supplier responsibilities being introduced under the BSC at a later stage, has been addressed.

Clarification for not receiving Data Flows

One market participant disagreed with the updated draft redlining following the first consultation as there was no process shown for Suppliers on what action to take if they did not receive any flow under 5.2.2.15 of BSCP514. ELEXON confirmed that the Supplier will always receive a response flow from SMRS. After confirmation the market participant confirmed agreement with the draft redlining.

Implementation Date

Five respondents reiterated concerns regarding the Implementation Date. Market participants highlighted that the CP would not be getting approved until 2 April 2019, which only provides under three months to make the necessary updates

ELEXON contacted all market participants who highlighted that they did not agree with the implementation approach. It was recognised by all parties that there is a requirement from Ofgem for this CP to be implemented by 27 June 2019 for Stage 0 of their Faster Switching Programme, and because of the related MRA DTC CP3554 change, also going live on 27 June 2019.

Market participants highlighted that there is a risk across the Industry that due to the compressed timescales to meet the June implementation, solutions may not be as rigorously tested as they would be if more time was available.

Although market participants are not comfortable with this timescale, all those who highlighted the implementation approach as an issue, agreed that the Implementation Date should remain 27 June 2019 to align with the DTC CP3554 and Stage 0 of Ofgem's Faster Switching programme.

ELEXON noted market participant time constraints regarding the implementation period for CP1515 and noted it will work with MRASCO and Gemserv to ensure implementation timescales for future changes are appropriate.

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7 Recommendations

We invite you to:

- **NOTE** the amendments to the proposed redlining for BSCP501 and BSCP514 for CP1515 made following the second CP Consultation**;**
- **APPROVE** the proposed changes to BSCP501, BSCP514 for CP1515; and
- **APPROVE** CP1515 for implementation on 27 June 2019 as part of the June 2019 BSC Release.

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8 Annex 1 – Summary of redlining comments from the first CP1515 consultation

This table summarises the clarification and inconsistency issues that were highlighted in the first CP1515 consultation.

For clarification purposes ELEXON would like to highlight that in the original BSCP514 redlining that was issued to industry on 8 January, there were a number of references throughout the document to "If response is anything other than 'Accepted' amend details and resend D0312". These references have now been removed from the amended redlining, but will not show as being removed on the updated document. This is because these references were not in the original document, and ELEXON have redlined against the original document, not the BSCP514 that was issued to industry to consult. Similarly, in BSCP514 section 2.1.4.1, in the BSCP514 document that was issued to industry the reference to "Meter Asset Provider" was taken out, however in the amended version it has been reinstated.

BSCP501

	Comment	ELEXON's Response
3.2A.1 3.2A.3 3.2A.5	The D0304 is only sent when the MAP Id changes and nothing else.	This has been clarified.
3.2A.5	In 3.2A.5 there is no value to be gained by the MOA or Supplier in receiving D0312 or D0304 'accepted' flows from the SMRA. It seems an inefficient use of the flows to inform us that they are 'accepted', when the assumption can be made that if no flow is received they have been accepted and we will be notified by 'rejected' flows when there is an issue with the flows.	This text cannot be removed, as the Faster Switching Programme requires the SMRS to send a "Response" D0312 or D0304, which will either contain an "Acceptance" code or one of several "Rejection" Codes. 3.2A.5 has now been merged with 3.2A.4
3.2A.2	Section 3.2A.2 states that "On receipt of data" SMRA will perform validation checks and 3.2A.3 "upon unsuccessful validation" SMRA will send D0312 and D0304. However, Section 3.2A5 states that "within 1 WD of 3.2A4 (successful validation) SMRA will notify MOA and Supplier of acceptance of Meter Information. Therefore there is inconsistency in timings for these sections which essentially are the same step, just one is an acceptance and one is a rejection In addition, BSCP514 section 5.3.4.18 states for the same actions "immediately following". There needs to be consistency between the timings stated within the BSCP501 and these should be reflected in BSCP514.	3.2A.5 has been merged 3.2A.4 and the "Within 1WD of 3.2A.4 above" has been removed. Amended as requested.

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	Comment	ELEXON's Response
2.1.4a	It should be made clear in the paragraph at the end of this step that where only the MPA Id has changed the D0304 should be sent in accordance with clause 2.1.4d. As an example the DTC states - The D0150 shall not be used to indicate a change of MAP only. The D0304 shall be used in this instance. The respondent suggests to use that text and just change D0150 to D0312.	Amended as requested.
2.1.4a	Suggest text is reviewed as flow may not be required - A D0312 flow may be sent where none of the above items have been changed e.g. when Meter Technical Details are sent on change of Supplier. or change of Meter Operator Agent. MPAS have no use for this flow and given the current high level of CoS would result in them receiving data flows that they don't want and the sender & Supplier receiving flows they don't want/need.	ELEXON have removed processes where they relate to Change of Supplier and/or Change of Agent
2.1.4b	It needs to be clear that the D0312 is sent to MOP and Supplier for both rejections and acceptances especially as 2.1.4c mentions acceptance.	Amended as requested.
2.1.4d	It needs to be made clear this is only when the MAP Id has changed and nothing else. After 2.1.4d – need the equivalent of 2.1.4b but for D0304.	Amended as requested.
5.2.1 15-7	Suggest review of these steps as they are making sending D0312 on CoA mandatory when MPAS and Suppliers have no use for it.	5.2.15-17 have been removed
5.2.4 16-18	Suggest review of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).	5.2.4 16-18 have been removed
5.2.7.10-12	Suggest review of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).	5.2.7.10-12 have been removed.
5.3.4.8	The reference to D0304 is appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes	The reference to D0304 has been removed.

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	as the result of the meter changing this is dealt with using the D0312.	
5.3.4.17	The reference to D0304 appears incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312.	The reference to D0304 has been removed.
5.3.5.6 6.3.4.23 6.3.4.27 6.3.4.29 6.3.5.6 7.1.21 7.4.20	The reference to D0304 appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312	The reference to D0304 has been removed.
5.4.1.15	The reference to D0304 appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312. The When should say "Immediately following 5.4.1.14"	The reference to D0304 has been removed.
6.2.1.11-13 6.2.4 15-17	Suggest review of all of these steps as MPAS and Suppliers have no use for it. Ofgem have a desire for MTD to be sent within 10 WDs but we assume this will be picked up by a future CP	References 6.2.1.11-13 and 6.2.4 15-17 have been removed.
Missing from redlining	On page 3 of the consultation document it is mentioned that the DTC CP3554 will: • introduce a revised version of the D0304 "Notification of Meter Asset Provider" DTC data flow including a Response Code; and • introduce new instances of the D0304 from Meter Operator to MPAS and from MPAS to Meter Operator following validation. However, in the BSCP514 redlining there is no mention of sending D0304 'from MPAS to Meter Operator following validation' and therefore it is also not clear why this is required. • introduce new instances of the D0304 from Meter Operator to MPAS and from MPAS to Meter Operator following validation. However, in the BSCP514 redlining there is no mention of sending D0304 'from MPAS to	Amended as requested.

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	Meter Operator following validation' and therefore it is also not clear why this is required.	
5.2.1.15 and 6.2.1.11	Change of HHMOA (No Change of Metering System or Change of Supplier) (5.2.1.15) states in the redlining "Optional, but if followed then within 10 WD of 5.2.1.8 or 5.2.1.13 (as applicable)". However (Change of NHHMOA (No change of Metering System or Change of Supplier) (6.2.1.11) states "Optional, but if followed then within 10 WD of 6.2.1.10 " Why is the sending of the D0312 mandatory for HHMOA but optional for NHHMOA?	Amended as requested
6.3.5.6	In this section the provision has been added: "If Meter Asset Provider has changed, send notification of the new Meter Asset Provider." It may be worth including this provision and D0304 requirement in all similar scenarios if it is a necessity.	Amended as requested
7.1.21	Change of Measurement Class from NHH to HH for HHDC-serviced Metering System (7.1.21) states the D0304 and D0312 flows should be sent by the NHHMOA, but this is a change to HH Measurement Class so wouldn't the assumption be for the flows to be sent from HHMOA?	Amended as requested
7.2.20	Similarly to the point made above (referencing 7.1.21), for Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems would the D0312 flow be sent from the HHMOA rather than the NHHMOA? The D0304 is not included in this scenario.	Amended as requested
As listed	There are a number of instances where the D0304 is omitted where it would appear to be required. Some of these instances may have a genuine reason for the D0304 not being needed, however it is unclear from the draft redlining. Please can it be confirmed whether omission of the D0304 in the following instances is intended, or where required correct the redlining to include the D0304: • New Connection – Installation (5.2.2.13) • Half Hourly Metering System Investigation Process – D0304 is	Amended to add a new section 5.2.8 relating to the D0304

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	included in 5.4.1.15 (for HHDC-serviced Metering Systems) but not in 5.4.1.19 (for Supplier -serviced Metering Systems). • New Connection (6.2.2.15) • Reconfigure or Replace Metering System (No Change of Measurement Class) – D0304 included in 6.3.4.23 (for smart meters) but not in 6.3.4.6 (NHH non-smart meters) • Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems (7.2.20) • Change of Measurement Class from HH to NHH for HHDC-serviced Metering Systems (7.3.20) • Coincident Change of Measurement Class from NHH to HH and Change of Supplier for Supplier-serviced Metering Systems. (7.6.12) • Change of Measurement Class from HH to NHH for Supplier-serviced HH Metering Systems. (7.7.4) • Coincident Change of Measurement Class from HH to NHH and Change of Supplier for Supplier-serviced Metering Systems. (7.8.12)	
7.4.20	With regards to sending notification of the new Meter Asset Provider from NHHMOA to SMRS via the D0304 – it is not clear why this is required in addition to the D0312 (because the D0312 will already update the SMRS of this information, it seems therefore to be duplicate information about the MAP included in the subsequent D0304).	Amended
5.3.4 5.3.5.7 and 5.3.5.8 5.4.1.16 and 5.4.1.17 6.3.4.24 and 6.3.4.25 6.3.4.28 and 6.3.4.29 6.3.5.9 and 6.3.5 7.1.22 and 7.1.23 7.4.21 and 7.4.22	BSCP514 Sections 5.3.4 State that the MOA sends a D0312 and if MAP change, a D0304 but in Section 5.3.4.18 the SMRS sends a D0312 response only. And if rejected, in Section 5.3.4.19, the MOA only resends a D0312. Therefore no provision has been made in BSCP514 for the acceptance/rejection of a D0304 and if rejected, no provision for MOA to resend a D0304. This also affects the following sections 5.3.5.7 and 5.3.5.8 5.4.1.16 and 5.4.1.17 6.3.4.24 and 6.3.4.25 6.3.4.28 and 6.3.4.29	This Issue has been addressed

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	6.3.5.9 and 6.3.5 7.1.22 and 7.1.23 7.4.21 and 7.4.22	
	There is no provision in the BSCP514 where the SMRS has sent a rejected D0312 to the MOA (or a D0304 – process step currently missing), and the MOA is not able to provide corrected data to resend the flows as the data they have sent is the only data they have got. What is the MOA expected to do in that scenario?	This will be a "best endeavours" rather than 5 WD
6.3.4.22	Section 6.3.4.22 references to section believed incorrect, i.e. was 6.3.4.15 now redlined to 6.3.4.14 and ditto Section 6.3.4.23.	Amended.

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9 Annex 2 – Summary of redlining comments from the second CP1515 consultation

This table summarises the clarification and inconsistency issues that were highlighted in the second CP1515 consultation.

BSCP501

	Comment	ELEXON's Response
Page 17	On page 17 remove footnote 7 and add to Section 1.11 Acronyms – MPAS- Metering Point Administration Service, which is the equivalent to SMRS. All information should be within the body of the document and not 'hidden' in footnotes.	Amended as requested
3.2B.3	To remove Supplier as the flow only goes to MOA.	Amended as requested
3.2B.3 & 4	Action-remove 'and Supplier' as the flow only goes to MOA	Amended as requested

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BSCP514

	Comment	ELEXON's Response
	Numerous instances where the loop when MOA sends a follow up / corrective D0312 is not closed because there is no response from the SMRS. This amendment is required at 5.2.2.15 5.2.2.21 5.2.5.12 5.3.3.9 5.3.4.10 5.3.4.20 5.3.4.26 5.3.5.8 5.4.1.17 5.4.1.23 6.2.2.17 6.3.3.10 6.3.4.8 6.3.4.25 6.3.4.29 6.3.5.8 6.4.1.11 7.1.23 7.3.22 7.7.6 See linked document for an example from 5.2.2.14 to 5.2.1.15 of the suggested amendment (add Go To an appropriate logic steps) to BSCP514 to address this	Amended as requested.
Section 5,6 and 7	Missing the logic to process the D0304 flow from Sections 5, 6 and 7	Amended to add a new section 5.2.8 relating to the D0304
Page 20	As comment above on page 17 footnote. Same applies to footnote re MOA/MOP	Amended
2.1.4.1a	'(see paragraph d below)' should now refer to 2.1.4.2	Amended
5.2.2.13	When-in step .12 the MOA gets 5wd, why should they get 10wd to send this flow given the odds are they will both be triggered	Amended
2.1.4.1	In BSCP514 there are sections which refer to MOPs sending flows to MPAS but then receiving rejections from SMRS (Example: 2.1.4.1 Meter Information), this is confusing, could the document consistently refer to SMRS or MPAS, but not both?	The references to MPAS are only in the name of the D0312 'Notification of Meter Information to MPAS'. This is because the MRA uses the term MPAS, whereas the BSC uses the term SMRS. I have used "SMRS" exclusively when not referring to the D0312

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	Comment	ELEXON's Response
	Npower MOA has an outstanding question with DTC CP3554 on the inclusion of 'Date of Meter Installation' as a mandatory field on the D0312 rather than it being optional. As such we have some concerns about the inclusion of this data item in BSCP514, but recognise the need to progress with this change for the June 19	Thank you for recognising the need to progress with CP1515. As DTC CP1515 has been approved already, a new DTC CP would be required to amend the optionality of the J0848 'Date of Meter Installation'.
5.2.2.13	When-in step .12 the MOA gets 5wd, why should they get 10wd to send this flow given the odds are they will both be triggered at the same time. Suggest this is changed to 5wd.	Amended as requested
5.2.2.15	Ideally this should link back to send flow in 5.2.2.14 because the MOA could go round this loop every time. Not sure how this is normally catered for in BSCPs	Amended as requested
5.2.2.21	As 5.2.2.15	Amended as requested
5.2.5.12	As 5.2.2.15	Amended as requested
5.3.3.7	I don't see why this has a different timescale to all the other flows the MOA has to send. Suggest when is changed to 'At the same time as 5.3.3.4'	Amended as requested
5.3.3.9	As 5.2.2.15	Amended as requested
5.3.4.8	When in step 7 the MOA gets 5wd, why should they get 10wd to send this flow given the odds are they will both be triggered at the same time. Suggest this is changed to 5wd. Also ' / reconfiguration' should be removed as this should not trigger a D0312 unless reconfigure includes adding/removing meters	Amended as requested
5.3.4.20	As 5.2.2.15	Amended as requested
5.3.4.24, .25 &.26	These steps are not required as Supplier reconfiguring meter cannot change any data associated with D0312	Amended as requested

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
SMRS	Supplier Meter Registration Service
ECOES	Electricity Central Online Enquiry Service
BSC	Balancing and Settlement Code
SVG	Supplier Volume Allocation Group
FSEG	Faster Switching Expert Group
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
MOA	Meter Operator Agent
MPAS	Meter Point Administration Service (MRASCo equivalent of SMRS / SMRA)
MOP	Meter Operator
MRASCo	Master Registration Agreement Service Company
MDB	Master Registration Agreement Service Company Development Board
SVA	Supplier Volume Allocation
CSS	Central Switching Service
BSCP	Balancing and Settlement Code Procedure
CSDs	Code Subsidiary Documents
SMRA	Supplier Meter Registration Agent (used in BSCP514)
SMRS	Supplier Meter Registration Service (used in BSCP501)

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0304	Notification of Meter Asset Provider
D0312	Notification of Meter Information to MPAS
New Data Item	MOP Flow Response Code
New Data Item	MPAS D0304 Response Code

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External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page (s)	Description	URL
3	ECOES	https://www.mrasco.com/ecoes/
3	Ofgem Faster Switching Programme	https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme
3	BSCP14	https://www.elexon.co.uk/csd/bscp514-sva-meter-operations-for-metering-systems-registered-in-smrs/
3	MRA Data Flows	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0312&FlowVers=1&searchMockFlows=False
3	Ofgem, end to end progression plan	https://www.ofgem.gov.uk/system/files/docs/2018/06/d-4.3.6_e2e_data_migration_plan_v1.0_0.pdf
4	Ofgem open letter	https://www.ofgem.gov.uk/publications-and-updates/open-letter-electricity-sector-stakeholders

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