

# CP Consultation Responses



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

This CP Consultation was issued on 8 January 2019 as part of CPC00792, with responses invited by 1 February 2019.

### Consultation Respondents

| Respondent                 | No. of Parties/Non-Parties Represented | Role(s) Represented  |
|----------------------------|--|--|
| TMA Data Management Ltd    | 0/4                                    | Supplier Agent: Half Hourly Data Collector (HHDC), Half Hourly Data Aggregator (HHDA), Non Half Hourly Data Collector (NHHDC), Non Half Hourly Data Aggregator (NHHDA) |
| SMS Energy Services Ltd    | 0/1                                    | Supplier Agent   |
| E.ON UK                    | 1/3                                    | Supplier, Supplier Agent: Data Collector (DC), Data Aggregator (DA), Meter Operator Agent (MOA)  |
| SP Distribution SP Manweb  | 1/0                                    | Distributor  |
| Npower Group Ltd           | 1/3                                    | Supplier, Supplier Agent: MOA, DC, DA  |
| British Gas                | 1/0                                    | Supplier   |
| IMServ                     | 0/1                                    | MOA  |
| Scottish Power             | 1/1                                    | Supplier, Supplier Agent   |
| SSE Electricity Ltd        | 2/1                                    | Supplier, Supplier Agent: Non Half Hourly Meter Operator Agent (NHHMOA)  |
| Western Power Distribution | 4/0                                    | Distributor  |

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Version 1.0

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## Summary of Consultation Responses

| Respondent                 | Agree? | Impacted? | Costs? | Impl. Date? |
|----------------------------|--------|-----------|--------|-------------|
| TMA Data Management Ltd    | ✓      | ✓         | ✓      | ✓           |
| SMS Energy Services Ltd    | ✓      | ✓         | ✓      | ✓           |
| E.ON UK                    | ✓      | ✓         | ✓      | ✓           |
| SP Distribution SP Manweb  | ✓      | ✓         | ✓      | ✓           |
| Npower Group Ltd           | ✗      | ✓         | ✓      | ✗           |
| British Gas                | ✓      | ✗         | ✗      | ✓           |
| IMServ                     | ✗      | ✓         | ✓      | ✗           |
| Scottish Power             | ✗      | ✓         | ✓      | ✗           |
| SSE Electricity Ltd        | ✗      | ✓         | ✓      | ✗           |
| Western Power Distribution | ✗      | ✓         | ✓      | ✓           |

## Question 1: Do you agree with the CP1515 proposed solution?

### Summary

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

### Responses

| Respondent                | Response | Rationale   |
|---------------------------|----------|---|
| TMA Data Management Ltd   | Yes      | No rationale given  |
| SMS Energy Services Ltd   | Yes      | No rationale given  |
| E.ON UK                   | Yes      | We agree that the proposed solution delivers the requirements of the faster switching programme.  |
| SP Distribution SP Manweb | Yes      | No rationale given  |
| Npower Group Ltd          | No       | <p>Whilst we agree with the changes made to the BSCPs further to DTC CP3554, we are concerned that the impacts to Suppliers, and additional impacts to MOAs have not been recognised.</p> <p>We note that the DTC CP3554 Final Change Report under Section 3 'Issue Resolution' lists related changes and recognises further CPs (under the MRA) that need to be raised:</p> <ul style="list-style-type: none"><li>• adding the relevant meter details to the Meter Point Administration Data (schedule 2) and to add the sending of the MTDs and the rejection flow to The Event Log (schedule 3)</li><li>• An MRA agreed procedure for Suppliers to validate the meter held on ECOES before migration to MPAS, and confirmation of the processes for using the new flows within this CP to maintain the data once the ECOES to MPAS migration has been completed.</li></ul> <p>The current drafting acknowledges Suppliers will receive the new version of the D0312, but does not provide clarity on what action a Supplier is expected to take.</p> |
| British Gas               | Yes      | No rationale given  |
| IMServ                    | No       | No - I agree with the high level concept & structural changes to the dataflow, but I don't agree with the   |

| Respondent                 | Response | Rationale  |
|----------------------------|----------|--|
|                            |          | changes made to BSCP514.   |
| Scottish Power             | No       | We believe that allowing the MOA the option to send the D0312 on gain, when there are no changes to the key data items, could cause problems if the D0149/D0150 information that they have received is incorrect data, which then results in a rejection D0312 being issued to the new MOA, the MOA will then have to go to the previous MOP to try and resolve, therefore 2 working days would not be a realistic timescale to resolve. Also if the gaining MOA decides not to send the D0312 at gain, it could mean that SMRS/ECOES is incorrect and the problem doesn't get corrected thus leaving legacy issues.   |
| SSE Electricity Ltd        | No       | We accept that BSC changes are needed to bring the relevant BSC procedures in line with the approved DTC CP3554 change due for implementation on 27 June 2019 and reflect the revised use of the D0312 and D0304 flows, and in principle we are in agreement with placing the obligation on MOAs and SMRA to send and receive the flows in general. However, we note that the proposed solution in CP1515 includes the requirement that 'accepted' D0312 and D0304 response flows are sent to the MOA and Supplier. We are concerned that there is no value to be gained from the sending of these 'accepted' flows to MOA and Supplier by return. The additional 'accepted' flows will require to be filtered through to view the more critical 'rejected' flows. System changes will be required to build such a filter. There is also an applicable charge for all flows sent over the DTN. It is our view therefore that the additional 'accepted' flows are not cost effective or efficient in their usage, and will require system and business process solutions in relatively short timescales to achieve June implementation. |
| Western Power Distribution | No       | Although we are supportive of the proposed solution in principle we have concerns that the solution provided in this CP is incomplete as there are inconsistencies between the BSCP501 amendments and the BSCP514 amendments. In addition, the BSCP514 redlining is incomplete.  |

## Question 2: Do you agree that the draft redlining delivers the CP1515 proposed solution?

### Summary

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

### Responses

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

| Respondent                | Response | Rationale  |
|---------------------------|----------|--|
| TMA Data Management Ltd   | Yes      | No rationale given   |
| SMS Energy Services Ltd   | Yes      | No rationale given   |
| E.ON UK                   | Yes      | We agree the proposed redlining delivers the solution.   |
| SP Distribution SP Manweb | Yes      | No rationale given   |
| Npower Group Ltd          | Yes      | We believe that the draft text delivers the CP1515 proposed solution, but believe that the proposed solution does not recognise wider impacts on Suppliers and MOAs as they will be receipt of a flow with no clear expectation as to how they should manage this.   |
| British Gas               | No       | See comments in table  |
| IMServ                    | No       | <p>No - I'm disappointed with the approach we have adopted for the implementation of the new D0312 &amp; D0304 rejection codes. I appreciate that the changes are being rushed through by Ofgem's faster switching program but that should not be an excuse for introducing a new process which haven't been thoroughly considered and evaluated.</p> <p>It seems MPAS have come-up with a long list of D0312/D0304 exception codes which will be sent to MOP and Elexon are now planning to mandate a two working day resolution timescale on the MOP, and doing this with very little consideration for the practicality of who or how the errors can actually be fixed in the real world.</p> <p>From the list of x20 D0312 codes I believe most of the codes will never occur, or very rarely occur as</p> |

| Respondent | Response | Rationale   |
|------------|----------|---|
|            |          | <p>the Wheatley MOP system has validation to prevent structural errors, for example: P Rejected - Meter ID is too long.</p> <p>As a result we expecting the majority of rejections to be assigned a small subset of codes, we predict the four most frequent rejection codes will be:</p> <ul style="list-style-type: none"> <li>• C Rejected - The MPAN is disconnected on date of meter work.</li> <li>• I Rejected - Sending MOP is not the appointed MOP on date of meter work or the current MOP</li> <li>• J Rejected - No MOP appointed to MPAN on date of meter work.</li> <li>• M Rejected - The Effective from Settlement Date {MSMTD} is prior to the previous Settlement Date {MSMTD} for this MPAN</li> </ul> <p>Has anyone documented the process a MOP must take to resolve the above issues, maybe an expert working group? I understand Gemserv has an action to provide a document but I haven't seen it yet, can we confidently set rules and timescales in BSCP514 if we don't understand the precise nature of the activity's we propose to measure?</p> <p>Have you considered that MOPs will not be able to fix significant amount of the Rejections as MOPs can't amend the details in MPAS? Also where MSMTD date inconsistencies exist how MOP will find-out what dates MPAS holds, if MOPs have no visibility of the dates in MPAS how will they resolve errors?</p> <p>We are suggesting that only MOPs will be responsible for resolving the D0304/D0312 Rejections, however it is reasonable to assume responsibility for resolving a subset of the rejection codes sits with the Suppliers, and this process is supported in the data flow as Suppliers also receive the Rejected D0312 from MPAS?</p> <p>The proposed words in BSCP514 suggests that the second D0312 a MOP sends will somehow be different to the first and therefore resolve the issue, unfortunately in lots of cases the second D0312 will look exactly the same as the first. Unless MOPs can identify issue with the content of the first D0312 why would they send a second, wouldn't this result MPAS sending further 'rejected' D0312s, and likely</p> |

| Respondent     | Response | Rationale  |
|----------------|----------|--|
|                |          | <p>an endless loop of send &amp; rejected D0312s?</p> <p>If a MOP doesn't need to 'Amend' their first D0312 will KPMG accept that MOPs don't need to re-send the flow at 2 WD?</p> <p>Or, maybe KPMG will apply the BSCP514 rule literally and force MOPs to re-trigger the same D0312 at 2WD?</p> <p>Have you considered specific D0312/D0304 MPAS processing rules when re-wording BSCP514, for example?</p> <ol style="list-style-type: none"> <li>1. If a MOP installs a meter on 01-01-19 and sends a D0312 with this date</li> <li>2. MPAS send Rejected code 'J' - No MOP appointed to MPAN on date of meter work</li> <li>3. The next day the Supplier updates MPAS to say the installing MOP is now effective from 01-01-19</li> </ol> <p>Will MPAS then trigger an updated D0312 to say the original D0312 has been accepted?</p> <p>Or will someone (Supplier?) need to ask the MOP to resend a duplicate D0312 to clear the error? Can this realistically happen in 2 WD?</p> <p>Using the same example above, what would happen if the Supplier were to register the MOPs appointment from 02-01-19 (1 day after the meter was installed), the MOP must not deliberately falsify information such a meter install dates, so unless the Supplier can correct/backdate the appointment to 01-01-19 then the error will be permanently unresolved, has this been considered?</p> <p>I believe there's a risk that MOPs will be pressured to deliberately falsify dates in the D0312s simply to clear MPAS Rejections. Doing so could have serious consequences downstream i.e. billing investigations/insurance claims/revenue protection investigations. Is it clear to everyone that MOPs must only submit 'true' data in the D0312/D0304 and that Suppliers should not ask MOPs falsify information to fix MPAS issues?</p> |
| Scottish Power | No       | <p>Please see question 1 response – We believe that the word optional for New MOA's to send the D0312 on gain needs further discussion/clarification</p>   |

| Respondent                 | Response | Rationale   |
|----------------------------|----------|---|
| SSE Electricity Ltd        | No       | We note that the redlining is poorly drafted. There are several inconsistencies, and instances where references to the D0304 have not been added where it seems they perhaps should, making it unclear exactly how usage of the flows applies and for which participants the usage is mandatory or optional. We have included specific comments in the relevant section below.  |
| Western Power Distribution | No       | <p>1. BSCP501 Sections 3.2A details that an MOA will send a D0312 to the SMRA and if the MAP has changed, the MOA will also send a D0304. The SMRA will then validate the data and if unsuccessful send a D0312 and if a MAP change, a D0304 to MOA and Supplier with a response code to indicate why the flow(s) failed validation. If the validation is successful, the SMRA will send a D0312 and if a MAP change, a D0304, to the MOA and Supplier to advise successful.</p> <p>However, 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.</p> <p>This also affects the following sections</p> <p>5.3.5.7 and 5.3.5.8</p> <p>5.4.1.16 and 5.4.1.17</p> <p>6.3.4.24 and 6.3.4.25</p> <p>6.3.4.28 and 6.3.4.29</p> <p>6.3.5.9 and 6.3.5</p> <p>7.1.22 and 7.1.23</p> <p>7.4.21 and 7.4.22</p> <p>2. BSCP501 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</p> |



| Respondent | Response | Rationale   |
|------------|----------|---|
|            |          | <p>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.</p> <p>In addition, BSCP514 section 5.3.4.18 states for the same actions “immediately following”.</p> <p>There needs to be consistency between the timings stated within the BSCP501 and these should be reflected in BSCP514.</p> <p>3. 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?</p> <p>In addition, whilst we acknowledge that this change is supporting faster switching, 2WDs is a very short turn around to resend a flow if further information needs to be sought for example, from the Supplier, and without knowing the volumes (which may be massive).</p> <p>4. 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.</p> |

## Question 3: Will CP1515 impact your organisation?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 9   | 1  | 0                  | 0     |

### Responses

| Respondent                | Response | Rationale   |
|---------------------------|----------|---|
| TMA Data Management Ltd   | Yes      | As a MOA our system and procedures will require to be modified.   |
| SMS Energy Services Ltd   | Yes      | As a MOA our systems, documents and processes will require updating. We will need to account for acceptance/rejection flows from MPAS and the resending of corrected D0312/D0304 flows.   |
| E.ON UK                   | Yes      | System change will be required to re-route D0312's / D304's to SMRS and process change will be required to monitor and process acceptance / rejection flows.  |
| SP Distribution SP Manweb | Yes      | As a DNO there is a requirement to change the SMRS system to accommodate the changes. This has already been discussed at the FSEG group. There is a requirement for a full data load of the metering data currently held on ECOES prior to migration to the new version.  |
| Npower Group Ltd          | Yes      | <p>Delivery of system and process changes for DTC CP3554 should make the necessary changes for BSC CP1515.</p> <p>We do not believe the potential impacts to Suppliers have been recognised and there is a risk that development is undertaken that may have to be changed at a later date when the MRA MAP is created.</p> |
| British Gas               | No       | No rationale given  |
| IMServ                    | Yes      | Yes – The Wheatley MOP database will need re-working to accommodate the flow changes. We will also have the ongoing resource overheads required to deal with MPAS rejections.   |
| Scottish Power            | Yes      | This change will have a minor impact on our organisation.   |
| SSE Electricity Ltd       | Yes      | As mentioned above, we anticipate business processes and system build solutions will be required as a result of this change, in relatively  |

| Respondent                 | Response | Rationale   |
|----------------------------|----------|---|
|                            |          | short timescales to meet the June implementation date.  |
| Western Power Distribution | Yes      | There will be considerable system and process changes required to accommodate this change for our MOA systems and SMRS. |

## Question 4: Will your organisation incur any costs in implementing CP1515?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 8   | 1  | 0                  | 1     |

### Responses

| Respondent                 | Response       | Rationale  |
|----------------------------|----------------|--|
| TMA Data Management Ltd    | Yes            | Low to medium impact.  |
| SMS Energy Services Ltd    | *Confidential* | *Confidential*   |
| E.ON UK                    | Yes            | We will incur one-off IT costs to implement systems changes.   |
| SP Distribution SP Manweb  | Yes            | We believe that there will be additional costs, but these would be absorbed in the DNO costs for the next release of MPRS.   |
| Npower Group Ltd           | Yes            | In addition to costs of implementing DTC CP3554, there is a risk that additional costs will be incurred when obligations on Suppliers and additional obligations on MOAs are clarified.                    |
| British Gas                | No             | No rationale given   |
| IMServ                     | Yes            | Yes – Currently unknown development costs and associated project costs, also the ongoing resource overhead required for deal with MPAS rejections.   |
| Scottish Power             | Yes            | Yes, there will be an IT cost to implement change – Further analysis required.   |
| SSE Electricity Ltd        | Yes            | There may be one-off costs incurred to amend business processes and system changes. We also note that there will be an applicable ongoing cost in the form of DTN charges for additional flows being sent. |
| Western Power Distribution | Yes            | Costs will be incurred to implement the system and process changes required to accommodate this change.  |

## Question 5: Do you agree with the proposed implementation approach for CP1515?

### Summary

| Yes | No | Neutral/No Comment | Other |
|-----|----|--------------------|-------|
| 6   | 4  | 0                  | 0     |

### Responses

| Respondent                 | Response | Rationale  |
|----------------------------|----------|--|
| TMA Data Management Ltd    | Yes      | No rationale given   |
| SMS Energy Services Ltd    | Yes      | No rationale given   |
| E.ON UK                    | Yes      | We agree with the implementation approach to align the DP1515 and MRA DTC CP 3554 dates.   |
| SP Distribution SP Manweb  | Yes      | No rationale given   |
| Npower Group Ltd           | No       | Our preference is for the MRA MAP CPs, related to DTC CP3554, to be raised and finalised prior to the implementation of BSC CP1515.  |
| British Gas                | Yes      | No rationale given   |
| IMServ                     | No       | No – I don't think enough analyses has been done yet, I don't think we should be setting timescales & responsibilities in BSCP514 until we fully understand the nature of the task.  |
| Scottish Power             | No       | We believe further discussions/clarity is required before we could agree to the current implementation approach.   |
| SSE Electricity Ltd        | No       | Whilst we agree that the proposed June implementation date could be achieved if the CP is approved imminently, it is our view that significant improvements and clarifications are required to the changes proposed and to the draft redlining, which will likely require some additional time to complete ahead of CP approval. Any delay to approval would reduce the time available to complete the system and process changes required and therefore make implementation by 27 June 2019 difficult to achieve. |
| Western Power Distribution | Yes      | No rationale given   |

## Question 6: Do you have any further comments on CP1515?

### Summary

| Yes | No |
|-----|----|
| 6   | 4  |

### Responses

| Respondent                | Response | Comments  |
|---------------------------|----------|---|
| TMA Data Management Ltd   | No       |   |
| SMS Energy Services Ltd   | No       |   |
| E.ON UK                   | Yes      | BSCP514 5.3.4.17 and 5.3.4.23 states "HHMOA" sends meter information change (D0312) after sending the D0149/D0150, I believe these should just be "MOA"   |
| SP Distribution SP Manweb | No       |   |
| Npower Group Ltd          | Yes      | As per our response to Question 1, we have sought clarity from Genserv as to when the outstanding CPs are going to be raised.   |
| British Gas               | Yes      | See BSCP 501 and 514 comments in table  |
| IMServ                    | Yes      | <p>In BSCP501 it says SMRA has one working day to notify the MOP of 'Successful' validation. As far as I can tell no timescales have been set for SMRA to notify parties for 'Unsuccessful' validations, should there be a timescale?</p> <p>Also, BSCP501 suggests that the D0312 &amp; D0304 accepted &amp; rejected codes go to Supplier and MOP, only the D0312 goes to both Supplier &amp; MOP, the D0304 is MOP only.</p>   |
| Scottish Power            | No       |   |
| SSE Electricity Ltd       | Yes      | In principle, we are in agreement with most of the changes to be applied with reference to the D0312 flow (excluding the D0312 'accepted' flow to be sent to Suppliers and MOAs). However, we are not in agreement with the drafting/ changes relating to the D0304 flow. Could we offer an alternative to the current proposal: to remove from the proposal the requirement for the D0312 and D0304 acceptance flows to be sent, and remove the requirement for the D0304 to be sent to MPAS on change of MAP. |

| Respondent                 | Response | Comments  |
|----------------------------|----------|---|
|                            |          | These amends would resolve the main issues we have identified with this CP.   |
| Western Power Distribution | Yes      | Whilst we are supportive of the intention of FSEG to put measures in place to enable the MOA to report MTDs into MPAS instead of ECOES, the BSC changes to support the new DTC data flows are incomplete and need further review to ensure a robust and workable process is achieved. |

**BSCP501**

| Respondent      | Location                   | Comment  |
|-----------------|----------------------------|--|
| British Gas     | 3.2A.1<br>3.2A.3<br>3.2A.5 | The D0304 is only sent when the MAP Id changes and nothing else  |
| SSE Electricity | 3.2A.5                     | It is our view that there is no value to be gained by the MOA or Supplier in receiving D0132 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. |

**BSCP514**

| Respondent  | Location | Comment   |
|-------------|----------|---|
| British Gas | 2.1.4a   | The D0312 contains the MAP Id so I believe it should remain on the list, however 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. So I would use that text and just change D0150 to D0312. |
|             | 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 flowsthat they don't want and the sender & Supplier receiving flows they don't want/need.           |
|             | 2.1.4b   | This 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.   |
|             | 2.1.4d   | It needs to be made clear this is only when the MAP Id has changed and nothing else.<br><br>After 2.1.4d – need the equivalent of 2.1.4b but for D0304.   |



| Respondent      | Location   | Comment  |
|-----------------|--|--|
| British Gas     |  |  |
|                 | 1.1.4f   | I don't see the need for this.   |
|                 | 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. (see 2nd 2.1.4a comment above).  |
|                 | 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).  |
|                 | 5.2.7.10-12  | Suggest review of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).  |
|                 | 5.3.4.8  | The reference to D0304 is appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes 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.   |
|                 | 5.3.5.6<br>6.3.4.23<br>6.3.4.27<br>6.3.5.6<br>7.1.21<br>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  |
|                 | 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"                  |
|                 | 6.2.1.11-13<br>6.2.4 15-17                                     | Suggest review of all of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).   |
|                 |  | Ofgem have a desire for MTD to be sent within 10 Wds but we assume this will be picked up by a future CP   |
| SSE Electricity | ??? Missing from redlining                                     | <p>On page 3 of the consultation document it is mentioned that the DTC CP3554 will:</p> <ul style="list-style-type: none"> <li>introduce a revised version of the D0304 "Notification of Meter Asset Provider" DTC data flow including a Response Code; and</li> </ul> |

| Respondent      | Location              | Comment  |
|-----------------|-----------------------|--|
| SSE Electricity |                       | <ul style="list-style-type: none"> <li>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.</li> </ul>  |
|                 | 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?   |
|                 | 6.3.5.6               | In this section the proviso has been added: "If Meter Asset Provider has changed, send notification of the new Meter Asset Provider." It may be worth including this proviso and D0304 requirement in all similar scenarios if it is a necessity.  |
|                 | 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?   |
|                 | 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.  |
|                 | As listed             | <p>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:</p> <ul style="list-style-type: none"> <li>New Connection – Installation (5.2.2.13)</li> <li>Half Hourly Metering System Investigation Process – D0304 is included in 5.4.1.15 (for HHDC-serviced Metering Systems) but not in 5.4.1.19 (for Supplier -serviced Metering Systems).</li> </ul> |

| Respondent | Location | Comment   |
|------------|----------|---|
|            |          | <ul style="list-style-type: none"> <li>• New Connection (6.2.2.15)</li> <li>• 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)</li> <li>• Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems (7.2.20)</li> <li>• Change of Measurement Class from HH to NHH for HHDC-serviced Metering Systems (7.3.20)</li> <li>• Coincident Change of Measurement Class from NHH to HH and Change of Supplier for Supplier-serviced Metering Systems. (7.6.12)</li> <li>• Change of Measurement Class from HH to NHH for Supplier-serviced HH Metering Systems. (7.7.4)</li> <li>• Coincident Change of Measurement Class from HH to NHH and Change of Supplier for Supplier-serviced Metering Systems. (7.8.12)</li> </ul> |
|            | 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).   |