

CP Consultation Responses



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

This CP Consultation was issued on 01 March 2019 as part of CPC00793, with responses invited by 14 March 2019.

There are three parts to this document:

- This is the main document. It provides details of respondents views on the solution, impacts, costs and implementation approach
- Attachments A-B contain the full response form of two market participants who included graphs/ attachments within their response to CP1515, so for ease of reading have been included as attachments to this document.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Haven Power Limited	1/0	Supplier
IMServ	0/1	Meter Operator Agent (MOA)
Opus Energy	1/0	Supplier
Siemens	0/2	Half Hourly Meter Operator Agent (HHMOA), Non Half Hourly Meter Operator Agent (NHHMOA)
SMS Energy Services Ltd	0/1	Supplier Agent
SSE	2/1	SSE Electricity Ltd, SSE Energy Supply Ltd, SSE Metering Ltd, Supplier, NHHMOA
TMA Data Management Ltd	0/5	TMA Data Management Ltd Market Participant Identifier (MPID UDMS), Half Hourly Data Collector (HHDC), Half Hourly Data Aggregator (HHDA), Non Half hourly Data Collector (NHHDC), Non Half Hourly Data Aggregator (NHHDA), MOA

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Version 1.0

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Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Western Power Distribution	4/0	Western Power Distribution (South Wales), Western Power Distribution (South West), Western Power Distribution (West Midlands), Western Power Distribution (East Midlands)
Scottish Power	1/1	Supplier, Supplier Agent
Npower Group Ltd	4/3	Supplier, MOA, Data Collector (DC), Data Aggregator (DA)
British Gas	1/0	Supplier

Summary of Consultation Responses

	Agree?	Impacted?	Costs?	Impl. Date?
Haven Power Limited	✗	✓	✓	✗
IMServ	✓	✓	✓	✗
Opus Energy	✗	✓	✓	✗
Siemens	✓	✓	✓	✗
SMS Energy Services Ltd	✓	✓	-	✓
SSE	✓	✓	✓	✗
TMA Data Management Ltd	✓	✓	✓	✓
Western Power Distribution	✓	✓	✓	✓
Scottish Power	✓	✓	✓	✓
Npower Group Ltd	✓	✓	✓	✓
British Gas	✓	✗	✗	✓

Question 1: Do you agree with the CP1515 updated solution following the first CP consultation?

Summary

Yes	No	Neutral/No Comment	Other
9	2	0	0

Responses

Respondent	Response	Rationale
Haven Power Limited	No	Although we acknowledge that changes are needed to the BSCPs following approval of DTC CP3554 for June 2019, as specified by a number of parties to the previous consultation, clarification is first required regarding what actions Suppliers need to take upon receipt of accepted or rejected D0312 flows. We appreciate Elexon's feedback in the previous consultation that ' <i>MRASCo would be progressing revisions to a MRASCo Agreed Procedure and developing a new guidance document to provide clarity around Supplier processes relating to DTC CP3554 and CP1515</i> ' but we recommend that implementation of CP1515 is delayed until this has been developed. If CP1515 is implemented in its current form, Suppliers may need to carry out a further development release post-consideration of a MAP.
IMServ	Yes	From a BSCP perspective version 0.2 is acceptable
Opus Energy	No	Although we acknowledge that changes are needed to the BSCPs following approval of DTC CP3554 for June 2019, as specified by a number of parties to the previous consultation, clarification is first required regarding what actions Suppliers need to take upon receipt of accepted or rejected D0312 flows. We appreciate Elexon's feedback in the previous consultation that ' <i>MRASCo would be progressing revisions to a MRASCo Agreed Procedure and developing a new guidance document to provide clarity around Supplier processes relating to DTC CP3554 and CP1515</i> ' but we recommend that implementation of CP1515 is delayed until this has been developed. If CP1515 is implemented in its current form, Suppliers may need to carry out a further development release post-consideration of a MAP.

Respondent	Response	Rationale
Siemens Managed Services	Yes	However we still have concerns over the redlining in the BSCPs and the proposed implementation date.
SMS Energy Services Ltd	Yes	No rationale given
SSE	Yes	We agree in principle with the updates and the intention of the solution. We continue to have concerns regarding inefficiencies in the proposed usage of the D0304 and D0312 flows as we outlined in our previous response, however we acknowledge that the flow changes of concern to us are not in scope of this BSC change.
TMA Data Management Ltd	Yes	No rationale given
Western Power Distribution	Yes	We are supportive of these changes however, we believe there are still errors in the red-lining which require amendment before the change proposal is accepted.
Scottish Power	Yes	We agree with the updated solution.
Npower Group Ltd	Yes	<p>We agree that the amendments made to the timescales for MOAs to manage rejections are more appropriate in the revised draft.</p> <p>Since our response to 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 our previous concern, around additional supplier responsibilities being introduced under the BSC at a later stage, has been addressed.</p>
British Gas	Yes	No rationale given

Question 2: Do you agree that the updated draft v0.2 redlining as part of this second CP1515 consultation delivers the CP1515 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	6	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
Haven Power Limited	No	Although a technical solution may be delivered, until required Supplier actions upon receipt of accepted or rejected D0312 flows are clarified, we don't believe it to be a practical and cost-effective solution.
IMServ	Yes	From a BSCP perspective version 0.2 is acceptable
Opus Energy	No	Although a technical solution may be delivered, until required Supplier actions upon receipt of accepted or rejected D0312 flows are clarified, we don't believe it to be a practical and cost-effective solution.
Siemens Managed Services	No	<p>Although this draft version of BSCP514 is an improvement over the version that accompanied the first consultation, there is still the possibility of a difference in interpretation by different parties around the requirement to resend and acknowledge flows that have been sent in response to rejection flows from the SMRS.</p> <p>From the wording in BSCP514 (multiple occurrences in Sections 5, 6 & 7 of the red-lined version) it reads that SMRS does not have to send a response flow when a corrected flow is sent by the MOA:</p> <p>Please see attachment A</p> <p>But the MOA is expecting the response flow from SMRS because they have interpreted the logic to be that the SMRS always sends a response flow. It could be argued that the red-lined BSCP514 assumes that there will only ever be one iteration of the response cycle, that the first corrected flow sent by the MOA will always be accepted by the SMRS, this will not always be true, and second (or third) set of Rejection and Response flows will be necessary. The</p>

Respondent	Response	Rationale
		<p>Rules in the DTC associated with DTC CP3544 require that the SMRS always replies to the D0312 or D0304 from the MOA with the appropriate flow with the response code regardless of whether it is the first or subsequent occurrence.</p> <p>In addition, all reference to the D0304 has been removed from BSCP514 apart from in Section 2. We believe that the logic relating to the processing of the D0304 must be included in the subsequent sections in the same way that the D0312 is. We use the logic from these sections to develop the application code for the systems to process the flows.</p> <p>These ambiguities in the BSCPs should be resolved, without the clarification our developers will be asking for clarification from ELEXON, which will have a negative impact on development timescales.</p> <p>See additional comments in the CP Red-lined section of this response.</p>
SMS Energy Services Ltd	Yes	No rationale given
SSE	No	We acknowledge that the draft redlining is much clearer, however further clarity should be given around the process that should be followed when no flows are received. For example, how long should a party wait to receive a flow? Is there an SLA on the "Accepted" flow? Who should contact whom to progress/ ensure action is taken?
TMA Data Management Ltd	Yes	No rationale given
Western Power Distribution	No	Please see attachment B
Scottish Power	Yes	No rationale given
Npower Group Ltd	Yes	n/a
British Gas	No	See comments below

Question 3: Will CP1515 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
10	1	0	0

Responses

Respondent	Response	Rationale
Haven Power Limited	Yes	Delivery of system changes for DTC CP3554 should enable implementation for CP1515, but this would not address the concerns raised above that clarification is required regarding what actions Suppliers need to take upon receipt of accepted or rejected D0312 flows.
IMServ	Yes	The main software development costs are associated with DTC CP 3554, remaining compliant with CP 1515 will require some user intervention to deal with MPAS rejections.
Opus Energy	Yes	Delivery of system changes for DTC CP3554 should enable implementation for CP1515, but this would not address the concerns raised above that clarification is required regarding what actions Suppliers need to take upon receipt of accepted or rejected D0312 flows.
Siemens Managed Services	Yes	We will have to develop system solutions to create and send the D0312 and D0314 to the correct parties, plus a system's solution to handle the incoming response dataflows. There will also have to be a MOA business process to review the response flows with rejections code and where necessary correct the data and resend the flow.
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.
SSE	Yes	As per our previous response, we anticipate business processes and system build solutions will be required as a result of this change, in very short timescales to meet the 27 June implementation date.
TMA Data Management Ltd	Yes	As MOA, our system and processes are affected.

Respondent	Response	Rationale
Western Power Distribution	Yes	There will be considerable system and process changes required to accommodate this change for our MOA systems and SMRS.
Scottish Power	Yes	We will have to make changes to our system, processes and documents as both a supplier and MOA.
Npower Group Ltd	Yes	Delivery of system and process changes for DTC CP3554 should make the necessary changes for BSC CP1515.
British Gas	No	n/a

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

Summary

Yes	No	Neutral/No Comment	Other
9	1	0	1

Responses

Respondent	Response	Rationale
Haven Power Limited	Yes	In its current form, there is a risk that further development costs may be incurred once the required actions that Suppliers need to take upon receipt of accepted or rejected D0312 flows have been clarified.
IMServ	Yes	Software development & associated costs.
Opus Energy	Yes	In its current form, there is a risk that further development costs may be incurred once the required actions that Suppliers need to take upon receipt of accepted or rejected D0312 flows have been clarified.
Siemens Managed Services	Yes	We will have a one-off cost in the IS development and implementation of the solution for CP1515. Then will be the on-going costs of processing the data flows and the use of the DTN, plus any costs for maintenance, amendments etc
SMS Energy Services Ltd	n/a	n/a
SSE	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.
TMA Data Management Ltd	Yes	Low to medium cost
Western Power Distribution	Yes	Costs will be incurred to implement the system and process changes required to accommodate this change.
Scottish Power	Yes	One off IT costs
Npower Group Ltd	Yes	It is not yet clear if there will be additional costs over and above those for the implementation of DTC CP3554

Respondent	Response	Rationale
British Gas	No	n/a

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

Summary

Yes	No	Neutral/No Comment	Other
6	5	0	0

Responses

Respondent	Response	Rationale
Haven Power Limited	No	Although a technical solution may be delivered, until required Supplier actions upon receipt of accepted or rejected D0312 flows are clarified, we don't believe it to be a practical and cost-effective solution.
IMServ	No	<p>We don't agree with the approach for DTC CP 3554 (followed by CP1515), it was hurried through with no time allocated for relevant workshops/expert working groups. The changes are driven from a MPAS flow processing perspective with little consideration for MOPs & Suppliers who need to manage the resulting 'Accepted' and 'Rejected' flows.</p> <p>We have been advised that the error resolution process will follow the current Ecoes process; however we believe the changes are significantly different to justify discussion, this logic also assumes the existing Ecoes process is working to a satisfactory standard, given FSEG's drive to data-cleanse Ecoes data we suspect it may not be.</p> <p>The impression given is that resolving MPAS exceptions isn't very important, for example it's also not clear what happens to unresolved MPAS issues on CoS/CoA events, the BSCPs don't cover CoS/CoA events and no guidance has been provided, it's just assumed that issues will somehow get resolved.</p> <p>We have missed an opportunity to define how a MOP should communicate MPAS rejection issues to Suppliers and how these communications will be audited i.e. how will MOPs evidence their 'reasonable endeavours'. MOPs could choose to send an auditable DTN flow (D0002) but Suppliers</p>

Respondent	Response	Rationale
		<p>may not pick-up this communication method, so instead MOPs might e-mail or make phone calls, or all of the above.</p> <p>In CP1515-CPC-Second-CP-Consultation.pdf it says:</p> <p>MRASCo would be progressing revisions to a MRASCo Agreed Procedure and developing a new guidance document to provide clarity around Supplier processes relating to DTC CP3554 and CP1515.</p> <p>We believe MRA may have changed their approach on this on the basis that there is already a (non-flow based) process in place i.e. they don't need to set out the expected way for a MOP to engage with third parties to resolve issues.</p>
Opus Energy	No	Although a technical solution may be delivered, until required Supplier actions upon receipt of accepted or rejected D0312 flows are clarified, we don't believe it to be a practical and cost-effective solution.
Siemens Managed Services	No	<p>We understand the Ofgem requirement for Stage 0 of their Faster Switching Programme implemented by the end of June, and because the related MRA DTC CP3554 being approved in November 2018 we have had visibility of the Industry Change and have been able to do some development. However even if this CP was approved at the start of April there will be less than the standard minimum 6 months between Approval and Implementation. We estimate that there would be 3 months to implementation which will not be enough time. Without the Approval of CP1515 we don't have the definitive processing rules to be able to complete the required development. In addition, Supplier Agents are experiencing a large amount of change due to developments associated with the rollout of SMETS2 meters which are occurring in the same timescale. There is only a finite developer resource available.</p> <p>There is therefore a risk across the Industry that due to the compressed timescales to meet the June implementation that solutions may not be as rigorously tested as they would be if more time was available. This would result in application maintenance having to be undertaken to correct</p>

Respondent	Response	Rationale
		errors and non-compliances, which will increase the cost of the CP to the Industry.
SMS Energy Services Ltd	Yes	No rationale given
SSE	No	There is now only very short window of time available to complete the system and process changes required between approval and implementation by 27 June 2019.
TMA Data Management Ltd	Yes	No rationale given
Western Power Distribution	Yes	No rationale given
Scottish Power	Yes	No rationale given
Npower Group Ltd	Yes	n/a
British Gas	Yes	No rationale given

Question 6: Do you agree with the revised response time following rejection of a D0312 or a D0304 flow?

Summary

Yes	No	Neutral/No Comment	Other
9	0	2	0

Responses

Respondent	Response	Rationale
Haven Power Limited	n/a	No rationale given
IMServ	Yes	The timescales are satisfactory
Opus Energy	n/a	No rationale given
Siemens Managed Services	Yes	5WD should provide adequate time for the MOA to send a corrected flow. Allowing a longer time could have a detrimental effect on Faster Switching. There is always the caveat that if the issue with data on the rejected flow cannot be solely resolved by the MOA then it becomes 'reasonable endeavours', with no time limit.
SMS Energy Services Ltd	Yes	No rationale given
SSE	Yes	We agree with the amended wording: "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".
TMA Data Management Ltd	Yes	No rationale given
Western Power Distribution	Yes	No rationale given
Scottish Power	Yes	No rationale given
Npower Group Ltd	Yes	The revised response time recognises the process constraints that MOAs may have in being able to manage rejection flows.
British Gas	Yes	No rationale given

Question 7: Do you have any further comments on the updated CP1515 being consulted on as part of this second consultation?

Summary

Yes	No
2	9

Responses

Respondent	Response	Comments
Haven Power Limited	No	
IMServ	Yes	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?
Opus Energy	No	
Siemens Managed Services	No	
SMS Energy Services Ltd	No	
SSE	No	
TMA Data Management Ltd	No	
Western Power Distribution	No	
Scottish Power	No	
Npower Group Ltd	Yes	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 release and will clarify this prior to implementation.
British Gas	No	

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Respondent	Location	Comment
British Gas	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.
	3.2B.3	To remove Supplier as the flow only goes to MOA.
	3.2B.3 & 4	Action-remove 'and Supplier' as the flow only goes to MOA

BSCP514

Respondent	Location	Comment
Siemens		<p>Numerous instances where the loop when MOA sends a follow up / corrective D0312 is not closed because there is no response from the SMRS.</p> <p>This amendment is required at</p> <p>5.2.2.15 5.2.2.21 5.2.5.12</p> <p>5.3.3.9 5.3.4.10 5.3.4.20 5.3.4.26</p> <p>5.3.5.8 5.4.1.17 5.4.1.23</p> <p>6.2.2.17 6.3.3.10</p> <p>6.3.4.8 6.3.4.25 6.3.4.29 6.3.5.8</p> <p>6.4.1.11</p> <p>7.1.23 7.3.22 7.7.6</p> <p>See linked document for an example from 5.2.2.14 to 5.2.1.15 of the suggested amendment (add Go To at appropriate logic steps) to BSCP514 to address this</p> <p>Missing the logic to process the D0304 flow from Sections 5, 6 and 7</p>
British Gas	Page 20	As comment above on page 17 footnote. Same applies to footnote re MOA/MOP

Respondent	Location	Comment
	2.1.4.1a	'(see paragraph d below)' should now refer to 2.1.4.2
	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.
	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
	5.2.2.21	As 5.2.2.15
	5.2.5.12	As 5.2.2.15
	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'
	5.3.3.9	As 5.2.2.15
	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
	5.3.4.20	As 5.2.2.15
	5.3.4.24, .25 &.26	These steps are not required as Supplier reconfiguring meter cannot change any data associated with D0312