

CP Consultation Questions

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

ELEXON



CPC Batch

This CP Consultation has been issued as part of CPC00793



Your response

We invite you to respond to the questions in this form.

A collated response form is available from the [Change Proposal Circulars](#) page of our website if you wish to respond to more than one consultation in this CPC Batch.



How to return your response

Please send responses, entitled 'CP1515 Second CP Consultation', to bsc.change@elexon.co.uk by **5pm on Thursday 14 March 2019**.

Response Form

We welcome your views and responses to the questions set out in this response form. To help us understand your response, please provide supporting reasons for your answers where possible. We also encourage you to provide financial information showing any costs and/or benefits of this change to your business.

ELEXON can treat any information provided as confidential if you request this, although we will provide all information to the relevant Panel Committee(s).

Your Details

Respondent

Name	Colin Frier
Organisation	Siemens Managed Services
Contact telephone number	07808 827594

Parties Represented

Names of BSC Parties				
Names of non-Parties	Siemens Managed Services			
BSC Party role(s) represented (mark all that apply)	<input type="checkbox"/>	Generator	<input type="checkbox"/>	Supplier
	<input type="checkbox"/>	Distributor	<input type="checkbox"/>	Interconnector User
	<input type="checkbox"/>	Int. Administrator	<input type="checkbox"/>	Int. Error Admin.
	<input type="checkbox"/>	Non Physical Trader	<input type="checkbox"/>	Transmission Co.
Non-Party role(s) represented (mark all that apply)	<input type="checkbox"/>	ECVNA	<input type="checkbox"/>	MVRNA
	<input checked="" type="checkbox"/>	Supplier Agent:	<input type="checkbox"/>	Other:
		HHMOA, NHHMOA		please state

Confidentiality

Does this response contain confidential information?	NO If 'Yes', please clearly mark the confidential parts
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CP1515
CP Consultation Questions

01/03/2019

Version 1.0

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CP Consultation Questions

Question 1

Do you agree with the CP1515 updated solution following the first CP consultation? **YES**

Please provide your rationale.

However we still have concerns over the redlining in the BSCPs and the proposed implementation date.

Question 2

Do you agree that the updated draft v0.2 redlining as part of this second CP1515 consultation delivers the CP1515 proposed solution? **NO**

If 'No', please provide your rationale.

Please record any general comments below and any specific comments in the section further on in this response form.

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.

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:

REF	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
5.2.2.12	Within 5 WD of 5.2.2.9	Send energisation status, MTD and initial Meter register reading.	HHMOA	Supplier / HHDC / LDSO	D0268 Half Hourly Meter Technical Details. If site is Complex, send Complex Site Supplementary Information Form. Refer to Appendix 8.4 Guide to Complex Sites. D0010 Meter readings.	Electronic or other method, as agreed.
5.2.2.13	Within 10 WD of 5.2.2.9	Send the relevant Meter information.	HHMOA	ECOESSMRS	D0312 Notification of Meter Information to ECOESSMRS .	Electronic or other method as agreed.
<u>5.2.2.14</u>	<u>Immediately following 5.2.1.13</u>	<u>Send response D0312.</u>	<u>SMRS</u>	<u>HHMOA Supplier</u>	<u>D0312 Notification of Meter Information to MPAS⁴⁴ with 'MOP Flow Response Code' populated</u>	<u>Electronic or other method, as agreed.</u>
<u>5.2.2.15</u>	<u>Within 5 WDs of 5.2.2.14</u>	<u>If response is anything other than "Accepted"</u> <u>Where the rejection is of a type the HHMOA can resolve without involving other industry parties, send a corrected D0312.</u> <u>If the HHMOA needs to involve other industry parties to resolve the issue, then reasonable endeavours should apply.</u>	<u>HHMOA</u>	<u>SMRS</u>	<u>D0312 Notification of Meter Information to MPAS⁴⁴.</u>	<u>Electronic or other method, as agreed.</u>

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 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.

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

Question 2

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.

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.

See additional comments in the CP Red-lined section of this response.

Question 3

Will CP1515 impact your organisation?

YES

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1515 and the CP1515 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

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.

Question 4

Will your organisation incur any costs in implementing CP1515?

YES

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

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

Question 5

Do you agree with the proposed implementation approach for CP1515?

NO

Please provide your rationale.

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.

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

Question 5

would be if more time was available. This would result in application maintenance having to be undertaken to correct errors and non-compliances, which will increase the cost of the CP to the Industry.

Question 6

Do you agree with the revised response time following rejection of a D0312 or a D0304 flow?	YES
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Please provide your rationale.

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.

Question 7

Do you have any further comments on the updated CP1515 being consulted on as part of this second consultation?	NO
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If 'Yes', please provide your comments.

Insert comments here

CP Redlined Text

If you answered 'No' to Question 2, please use this section to record any specific comments you have against the CP1515 v0.2 draft redlining, including the specific section and paragraph that each comment applies to. You can add further rows to any tables as required.

BSCP501	
Location	Comment

BSCP514	
Location	Comment
	<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 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> CP1515_BSCP514.d OCX</p>
	Missing the logic to process the D0304 flow from Sections 5, 6 and 7

BSCP514	
Location	Comment

Further Information

To help us process your response, please:

- Email your completed response form to bsc.change@elexon.co.uk, entering "CP1515 Second CP Consultation" in the subject line
- Clearly indicate any confidential parts of your response
- Respond by **5pm** on **Thursday 14 March 2019** (the Panel Committees may not be able to consider late responses)

The SVG will consider your consultation response at its next meeting, where it will make a decision on whether to approve this CP.