CP Assessment Report

CP1534 'Introduce Change of Supplier (CoS) - No Meter Process'

ELEXON

Contents

About This Document

This document is the Change Proposal (CP) Assessment Report for CP1534 which ELEXON will present to the SVG at its meeting on 1 September 2020. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1534.

There are five 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 the CP Consultation.

- Attachment(s) A-C contain the proposed redlined changes to deliver the CP1534 solution.

- Attachment D contains the full responses received to the CP Consultation.

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1   Summary

Why change?

Currently the Supplier Meter Registration Agent (SMRA) allows registrations to be deleted if no Meter has been installed on a Metering Point. This process removes the original Supplier's registration so that a second Supplier can treat the site as a new connection (rather than a Change of Supplier (CoS)) and arrange for the Meter Operator (MOA) to install a Meter. This functionality will not be available within the Central Switching Service (CSS) which is due to go-live in Summer 2021 (subject to any re-planning as a result of the COVID-19 pandemic).

The CoS process, where there is no Metering Equipment at site, is not explicitly defined within the relevant BSCPs. Suppliers and Supplier Agents follow the existing CoS processes, which includes requesting Meter Read History (MRH) that is not available due to the lack of Metering Equipment on site.

Following the introduction of the CSS, this process will become more prevalent and affect Suppliers, Meter Operator Agents (MOA), Half Hourly Data Collectors (HHDC) and Non Half Hourly Data Collectors (NHHDC).

Solution

To create a new 'Change of Supplier (CoS) No Meter' process within BSCP502, BSCP504 and BSCP514. The new processes will instruct Suppliers, Data Collectors (DCs) and MOAs on which dataflows to send if there is no Metering Equipment on site.

Impacts and costs

CP1534 impacts Suppliers, Meter Operators (MOA), Non Half Hourly Data Collectors (NHHDC) and Half Hourly Data Collectors (HHDCs). Respondents identified process and system changes are required to implement the solution. Five respondents identified costs would be incurred in implementing these changes, but values were not made public.

Implementation

CP1534 is proposed for implementation on **25 February 2021** as part of the February 2021 BSC Release.

Recommendation

We invite the **SVG** to:

- **APPROVE** the amendments to the proposed redlining for BSCP502, BSCP504 and BSCP514 for CP1534 made following the CP Consultation;

- **APPROVE** the proposed changes to BSCP502, BSCP504 and BSCP514 for CP1534; and

- **APPROVE** CP1534 for implementation on 25 February 2021 as part of the February 2021 Release.

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2   Why Change?

What is the Switching Programme?

The Retail Energy Code (REC) and Central Switching Service (CSS) are key components of Ofgem's Switching Programme. The objective of the Switching Programme is to improve customers' experience of switching, leading to greater engagement in the retail energy market by designing and implementing a new switching process that is reliable, fast and cost-effective. The Retail Code Consolidation (RCC) Significant Code Review (SCR) will consolidate existing Industry Codes into the REC.

RCC SCR changes are expected to be implemented on 1 April 2021. However, we are aware that Ofgem are reviewing the SCR plans in response to COVID-19.

The Switching SCR will implement a new switching process, utilising the CSS and requiring consequential changes to the Change of Supplier, registration and Agent processes in the BSC. These changes are highlighted in redlining sent to Ofgem on 31 March 2020 and are not part of this CP. Switching SCR changes were expected in summer 2021, but as a result of the Covid-19 pandemic and following a recent Ofgem announcement, are likely to be delayed until at least September 2021.

Issue 86 Background

ELEXON, on behalf of the BSC Panel, was requested, to inform Ofgem how processes relating to CoS and Change of Agent (CoA) would be impacted by the Switching Programme. These processes will impact:

- Data Collectors (DCs)

- Data Aggregators (DAs)

- MOAs

- Suppliers

Issue 86 was raised by ELEXON to consider the changes needed to the BSC and its subsidiary documents to facilitate the Switching and RCC SCRs. As part of Issue 86 Review of processes potentially impacted by Ofgem's Switching Programme, the workgroup was asked to identify where processes, particularly timescales, will need to be amended to meet delivery of the RCC and Switching SCRs in 2021. If there was an opportunity to implement changes ahead of CSS go-live, they would be considered on the basis there was no risk to impairing REC and/or CSS related Changes. This proposal is one such example of this.

What is the issue?

The Issue 86 workgroup has identified an issue, which will become more prevalent following the implementation of the CSS, with Metering Systems being registered where there is no Meter installed on site. There is currently no defined process within the BSCPs to cater for a CoS in this scenario.

Currently the SMRA allows registrations to be deleted if no Meter has been installed on a Metering Point. This process removes the original Supplier's registration so that a second Supplier can treat the site as a new connection (rather than a CoS) and arrange for the

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Meter Operator (MOA) to install a Meter. This functionality will not be available within the CSS.

There are no processes within BSCP502, BSCP504 and BSCP514 to identify how the CoS process should work when there is no Meter on site. Suppliers and Supplier Agents follow the existing CoS processes, which includes requesting Meter Read History (MRH) that is not available due to the lack of Metering Equipment on site. There is a risk that the new Supplier or NHHDC system are waiting for data that they are not going to receive. This, in turn, could mean that subsequent processing for the Metering System in question is stalled, which could result in subsequent readings not being processed and estimated data entering Settlement.

Following the introduction of the CSS, this process will become more prevalent due to Suppliers no longer being able to delete registrations and will affect Suppliers, MOAs, HHDCs and NHHDCs. The Issue 86 Workgroup advised that introducing a new process will ensure a consistent industry approach to this scenario and enable new Metering Equipment to be installed at the earliest available opportunity.

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3   Solution

Proposed solution

To create a new 'Change of Supply (CoS) – No Meter' process. The new processes will describe the actions to be taken by Suppliers, DCs and MOAs when the Meter Technical Details (MTD) indicate that there is no Metering Equipment on site.

The process will be introduced in the following documents:

- Introduce new 'Change of Supply (CoS) – No Meter' process in BSCP502

- Introduce new 'Change of Supply (CoS) – No Meter' process in BSCP504

- Introduce new 'Change of Supply (CoS) – No Meter' process in BSCP514, for both Half Hourly and Non Half Hourly MOA

Proposer's rationale

As part of Issue 86, industry subject matter experts have recommended the outlined updates to ensure that a consistent CoS process is adopted by Suppliers and Agents where no Meter is installed, given that this process will become more prevalent following the introduction of the CSS and enable Suppliers to identify where metering equipment needs to be installed at the earliest opportunity.

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4   Impacts and Costs

Central impacts and costs

CP1534 will require changes to BSCP502, BSCP504 and BSCP514. No central system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1534 will be approximately £480 (two ELEXON man days) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
• BSCP 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' • BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' • BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'	None

BSC Party & Party Agent impacts and costs

CP1534 impacts Suppliers, Meter Operators (MOA), Non Half Hourly Data Collectors (NHHDC) and Half Hourly Data Collectors (HHDCs). Respondents identified process and system changes are required to implement the solution. Five respondents identified costs would be incurred in implementing these changes, but values were not made public.

No other BSC Parties or Party Agents are expected to be impacted.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Changes will be required to implement the solution.
MOA	
NHHDC	
HHDC	

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5   Implementation Approach

Recommended Implementation Date

CP1534 is proposed for implementation on **25 February 2021** as part of the February 2021 BSC Release.

The February 2021 Release is the next available Release that can include this CP. We also believe this is likely the last available Release to include this CP in until after the REC has gone live.

Subject to approval by the SVG on 1 September 2020, this will leave approximately five to six months to implement. We recognise that it is a busy period, exacerbated by the current Covid-19 situation, but once Ofgem has directed the SCR changes, there is likely to be a moratorium on changes impacting the SCRs.

As Ofgem is minded to transfer key Meter Operator requirements to the REC, the proposed changes would effectively become cross-code changes, if not agreed before November 2020. This would probably mean that the changes could not be made until after the implementation of the SCRs.

It was also agreed with the Issue 86 Group and with Ofgem, that any changes raised from the Issue Group should not be directed through the SCRs, due to industry familiarity with the current change process and to ensure that the CP has full industry visibility. There is a risk that Suppliers and Agents could miss the changes, if they were part of the significant number of changes being made across eight industry codes under the SCRs.

Due to its alignment with the objectives of the Switching Programme, we are targeting February 2021 to ensure there is no delay in implementation.

Following Ofgem's announcement on 31 March 2020 that there would be a delay to the wider switching programme we contacted Issue 86 members to understand if they would be in favour of CP1534 being raised for an implementation date of November 2020 or February 21. Out of nine recipients, four were in favour of aiming for November, four in February and one participant suggested June 2021. Following the responses we spoke to Ofgem who confirmed we could target an implementation date of February 2021.

Due to a combination of COVID-19 and ELEXON system issues we were unable to raise the CP in a timescale to target November 2020 and therefore February 2021 is the first release this CP can target.

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6 Initial Committee Views

SVG's initial views

The Supplier Volume Allocation Group (SVG) considered CP1534 at its meeting on 3 March 2020 (SVG229/17) as part of Other Business and Matters Arising, rather than via the usual Progression Paper. Following the Issue 86 recommendation to progress this CP there was not sufficient time to submit a Progression Paper without adding an extra month to the progression timeline of this CP. The view was taken that it was better to give more time to implement this CP, than to present a Progression Paper.

The SVG confirmed they were happy for the CP to go straight to consultation phase and did not ask for any additional questions to be added to the CP Consultation.

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This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment D.

Summary of CP1534 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1534 proposed solution?	9	0	0	0
Do you agree that the draft redlining delivers the intent of CP1534?	6	3	0	0
Will CP1534 impact your organisation?	6	3	0	0
Will your organisation incur any costs in implementing CP1534?	5	4	0	0
Do you agree with the proposed implementation approach for CP1534?	6	2	0	1
Do you have any further comments on CP1534?	1	8	-	-

CP Responses

Responses were received from nine participants including Suppliers, a Distributor and Supplier Agents including NHHDCs, MOAs, and HHDCs. All respondents agreed with the proposed solution.

Impacts were identified by six respondents, across all Market Roles, identifying process and system changes would be required to implement the solution. Five respondents identified costs would be incurred in implementing these changes, but values were not provided.

Implementation Date

One Supplier and one Supplier Agent disagreed with the proposed Implementation Date of February 2021. The majority of respondents agreed with this date and Elexon support this view based on the proposed changes formalising a process that is already active in the market but not detailed in the BSCPs. We also believe that if Meter Operation obligations are transferred to the REC, the change will then become a cross-code BSC and REC change. This will make it challenging to implement in time to provide a solution before the ability to de-register MSIDs without meters is removed.

Comments on the proposed redlining

A number of comments were submitted on the proposed redlining by respondents, ELEXON have responded to all parties and updated the BSCPs where outlined below. We do not believe these changes signify material changes to the solution, the proposed changes enable participants to have greater clarity over an existing process that is being formalised within the relevant BSCPs.

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BSCP504 has also been updated to include housekeeping changes.

Comments on the CP1534 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 3.2.8	Does this process only apply where there is a new Supplier and new HHDC since 3.2.8.1 has From 'New Supplier' To 'New HHDC'	This is the same terminology used for Change of Supplier with a meter. New NHHDC is intended to mean the NHHDC appointed by the new Supplier, so may or may not be the same NHHDC as the one appointed by the old Supplier.
BSCP502 3.2.8.1	When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed.	Wording updated to 'By New Supplier SSD'
BSCP502 3.2.8.2	Most of the text in this row appears to relate to responding to 3.2.7.1 which has multiple flows and should be removed.	Removed text as suggested.
BSCP502 3.2.8.2	In 3.2.8.2 the 'ACTION' and 'INFORMATION REQUIRED' columns describe a process involving 'SVA MS' and in this case there isn't one? I think both of these items descriptions should be removed leaving the sending of the D0011 as is.	SVA MS refers to an SVA Metering System. There will be a Metering System (with an MSID/MPAN) even if there is no Meter. 3.2.8.2 applies to the appointment process, which is per Metering System rather than per Meter.
BSCP502 3.2.8.4	When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD, this says On Termination so should be changed.	Wording updated to 'By New Supplier SSD'
BSCP502 3.2.8.5	As there is no meter are Faults and D0002 relevant?	Removed D0002 from step.
BSCP502 3.2.8.5	Notwithstanding this point, in 3.2.8.5 the MOA is expected to send a D268 to the HHDC by SSD, surely there is no meter on site? As far as I know both D268 and D0002 flows must contain the Meter Id (Serial Number) and no meter exists onsite. What is intended here? Is it intended that this process would inform HHDCs such that they would not request previous consumption data?	D0002 to be removed (as above). On the D0268 - the meter serial number is mandatory, but within an optional group i.e. "If Meter at metering point" appears within the Condition column in the DTC.

Comments on the CP1534 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	Please explain.	
BSCP502 3.2.8.6 & 3.2.8.7	As there is no meter I don't think either of these would/could occur.	Steps removed from process
BSCP504 3.2.8	The BSCP502 change includes sending D0151 (de-appointment) is there a reason the same step has not been included here?	Originally the D0151 was omitted because it served a purely contractual purpose with no Settlement dependencies. But over time, this thinking has changed and the D0151 has gradually found its way into the process definitions. It is not included in the standard CoS process though from which this process was copied.
BSCP504 3.2.8.1	When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed.	Wording updated to 'By New Supplier SSD'
BSCP504 3.2.8.6	As there is no meter and potentially never was the best the DC can send is the EAC/AA based on final reading from meter removal. If the DC was never aware of a meter then the flows won't be sent. I think this needs to be made clearer within the steps (not footnote).	Added "(i.e. to the extent that that the relevant data is available for a removed Meter)" after "If applicable" to provide additional clarity as suggested.
BSCP504 3.2.8.6	In practice the old NHHDC will not send any MRH if there is no meter on site	Added "(i.e. to the extent that that the relevant data is available for a removed Meter)" after "If applicable" to provide additional clarity as suggested.
BSCP514 5.2.9.1	When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed.	Wording updated to 'By New Supplier SSD'
BSCP514 5.2.9.9 & 5.2.9.11	As above, where there has never been a meter at site then there is currently no way to populate the MMTD which is mandatory in the flows – so this flow will only be sent if there has been a meter at site that has now been removed	The meter group within the MTD flows only needs to be populated when there is a meter and the EFSD {MSMTD} can be defaulted (e.g. to date that MTD is sent).

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Comments on the CP1534 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP514 6.2.6.1	When – the issue 86 working group agreed that the agent appointment flows should be sent by SSD-1, this says As Required so should be changed.	Wording updated to 'By New Supplier SSD'
BSCP514 6.2.6.5	Remove the obligation to send a D0303	Step removed from process

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8   Recommendations

We invite the **SVG** to:

- **APPROVE** the amendments to the proposed redlining for BSCP502, BSCP504 and BSCP514 for CP1534 made following the CP Consultation**;**

- **APPROVE** the proposed changes to BSCP502, BSCP504 and BSCP514 for CP1534; and

- **APPROVE** CP1534 for implementation on 25 February 2021 as part of the February 2021 Release.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CoA	Change Of Agent
CoS	Change of Supplier
CP	Change Proposal
CSS	Central Switching Service
DA	Data Aggregator
DC	Data Collector
HH	Half Hourly
MOA	Meter Operator
MRH	Meter Read History
MTD	Meter Technical Details
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector
RCC	Retail Code Consolidation
REC	Retail Energy Code
SCR	Significant Code Review
SMRA	Supplier Meter Registration Agent
SVG	Supplier Volume Allocation Group
WD	Working Days

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
2	Central Switching Service	https://www.ofgem.gov.uk/publications-and-updates/uk-link-and-proposed-central-switching-service
2	BSCP502	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp502/
2	BSCP504	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp504/

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External Links		
Page(s)	Description	URL
2	BSCP514	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp514-2/
3	Retail Energy Code	https://www.ofgem.gov.uk/licences-industry-codes-and-standards/industry-codes/electricity-codes/retail-energy-code-rec
3	Ofgem Switching Programme	https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme
3	RCC SCR	https://www.ofgem.gov.uk/publications-and-updates/retail-code-consolidation-scr-launch-statement
3	Switching SCR	https://www.ofgem.gov.uk/publications-and-updates/switching-significant-code-review-launch-statement-and-request-expressions-interest-participate-programme-workgroups
3	BSC Panel	https://www.elexon.co.uk/group/the-panel/
3	Issue 86	https://www.elexon.co.uk/smg-issue/issue-86/
7	ELEXON Releases	https://www.elexon.co.uk/change/releases/the-release-and-implementation-process/
7	SVG 229	https://www.elexon.co.uk/meeting/svg229/
7	Switching Programme Delay	https://www.ofgem.gov.uk/publications-and-updates/ofgem-information-energy-licensees-coronavirus-covid-19-response

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