

CP Consultation Responses



CP1543 'Use of DTC dataflow D0051 in the Half Hourly sector for Data Collectors to confirm the Data Retrieval method to Suppliers'

This CP Consultation was issued on 12 April 2021 as part of the April 2021 CPC batch, with responses invited by 10 May 2021.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Drax	4	Supplier, ECVNA, MVRNA
IMServ	1	HHDC
Siemens	1	HHDC
SMS	6	HHDA, HHDC, HHMOA, NHHDA, NHHDC, NHHMOA
SSE	1	Supplier
Stark	4	HHDA, HHDC, HHMOA, NHHDC
TMA	4	HHDA, HHDC, HHMOA, NHHDC

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
Drax	✓	✗	✓	✓
IMServ	✗	-	-	✗
Siemens	✓	✓	✓	✓
SMS	✓	✓	✓	✓
SSE	✗	✓	✗	✓
Stark	✓	✗	✗	✓
TMA	✓	✓	✓	✓

Question 1: Do you agree with the CP1543 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	1

Responses

Respondent	Response	Rationale
Drax	Yes	<p>We agree with the intent of the solution including placing an obligation on the HHDC to confirm to the Supplier the Retrieval Method via the D0051 (Affirmation of Half Hour Data Retrieval Method and Associated Details) Data Flow to help ensure that Suppliers are aware of how consumption data is retrieved. However, under the proposed solution, we're unclear when the D0051 should be sent. Please see our response to Q2 below.</p> <p>Conditional upon our comments under Q2, we support updating BSCP502 (Half Hourly Data Collection for Supplier Volume Allocation (SVA) Metering Systems Registered in SMRS) to mandate the sending of the D0051 by the HHDC because then Suppliers will no longer need to rely on informal bilateral communications to confirm with the HHDC if a Meter cannot be dialled remotely. This should lead to improved SF Settlement performance, as Suppliers will be able to put in place appropriate measures to obtain consumption data if they're aware their original Retrieval Method is not available.</p>
IMServ	No	<p>Although we currently issue D0051s as detailed below and believe we are already compliant with this CP, we do not agree in mandating the sending of this flow.</p> <p>The HHDC already provides a mandatory D0012, which tells the Supplier the initial read frequency, so why is the Method required? Also where a Metering System has no communications installed, this will be specified in the D268 that the HHMO already sends to the Supplier. In fact the D268 always includes the Retrieval Method.</p> <p>If the aim is to improve HH performance, analysis of D268s, D0001 and D0004 is likely to give significantly better results.</p>

Respondent	Response	Rationale
		<p>Further the sending of the D0051 is only a snapshot view: should the Retrieval Method change (which it can), no new D0051 will be triggered.</p> <p>We are also uncomfortable with the words in the CP "By putting an obligation on the HHDC to confirm the Retrieval Method this would obligate the HHDC to obtain reads or give the Supplier notification they can't do it." This seems to indicate that the CP is seeking to ensure the HHDC performs the collection activity itself and goes beyond just issuing the D0051. However, having spoken to Elexon this morning, they believe this is not the intent. It would be good to repeat this clarification to the wider audience.</p>
Siemens	Yes with caveat	<p>We agree with sending the D0051. However, we suggest that the D0051 is sent following receipt of the D0268 (Meter Technical Details) from MOA. Sending the D0051 after the D0155 has been received can only reiterate the information received. However, the D0268 may conflict with the information on the D0155 and therefore provide information to the Supplier that can be of use.</p> <p>However, for Supplier Serviced MPANs the position is different because there is no D0268 receipt. Indeed, we suggest the D0051 is not used at all for Supplier Serviced MPANs as the return code can only be that provided by the Supplier in the first place.</p>
SMS	Yes	
SSE	No	<p>At the point of appointment via the D0155 flow the HHDC will not necessarily have knowledge of the method of communication, as they would not yet have received the D0268 (Half Hourly Meter Technical Details) informing them of the communications method at site. If the D0051 is sent in response to the D0155, the D0051 would just repeat the retrieval method stated in the D0155 and this would make the D0051 redundant. We believe the trigger for the D0051 should be receipt of the D0268 by the HHDC, as this would mean the HHDC would be aware of the communications method at site and so could send the D0051 with meaningful data in the Retrieval Method field.</p>
Stark	Yes	As HHDC we currently use the D0051 routinely to send verification to Supplier of retrieval method.

Respondent	Response	Rationale
		<p>This is particularly used, as stated by proposer's rationale for confirmation that meter can be dialled remotely however only issued on receipt of MTD, as on receipt of D0155 HHDC is not in position to confirm whether Supplier's preferred retrieval method is possible.</p> <p>Additionally, often on appointment the D0155 could be received without a defined retrieval method i.e., item reference 'N' - Not known at time of appointment or request for meter installation.</p> <p>There was suggestion from the proposed solution that D0051 would be expected directly from receipt of the D0155, however the red lining of BSCP502, as mentioned below, does clearly indicates this not to be the case.</p>
TMA	Yes	Yes, we agree this will give Suppliers a better view of the method of data collection, although this will still be reliant on the correct details being provided in the D0268 flow from the meter operator.

Question 2: Do you agree that the draft redlining delivers the CP1543 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
4	3	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
Drax	No	<p>The proposal suggests that the D0051 will be sent to the Supplier on receipt by the HHDC of the D0155 Appointment flow along with the D0011 Acceptance Flow. If that is the case, we question how the HHDC would know if they can dial the meter or not at this stage if they've not received the D0268 (Half Hourly Meter Technical Details) from the MOP confirming the metering and communications information, including the number to dial to obtain the HH data.</p> <p>In our view, the D0051 should only be sent once the HHDC knows whether it can successfully dial the meter. If the HHDC has not received the D0268 prior to sending the D0051 to the Supplier, then they may populate the Retrieval Method as "Not known". We believe the D0268 should be the trigger for this process, and so our support for this proposal is conditional upon the HHDC having received the D0268 prior to them sending the D0051 to the Supplier.</p>
IMServ	No	<p>In Section 3.2.1, is it intended that a D0051 is only issued for HHDC Serviced Metering Systems? We therefore assume there is no need for a HHDC to issue this flow back to the Supplier where the Retrieval Method is 'S'?</p> <p>Under 3.2.1 and subsequent sections the D0051 is only sent after a D268 is received by the HHDC. Therefore, in the case of an Unmetered Metering Systems as no D268 is sent, no D0051 would be sent; is this correct and the intent?</p> <p>Why is a D0051 required under section 3.3.11 and 3.3.12, this is inconsistent with 3.2.1</p>

Respondent	Response	Rationale
Siemens	No	We suggest that the D0051 is sent only after receipt of the D0268, not the D0155. In the case of Supplier Serviced MPANs, the D0051 is not required to be sent at all.
SMS	Yes	
SSE	Yes	
Stark	Yes	<p>As stated above the redlining indicates D0051 issued simultaneous with D0012 on receipt of MTD; this is important distinction as wording of solution suggests in response to D0155 which could be misconstrued as when the Supplier might expect the D0051 i.e., prior to receipt of MTD.</p> <p>What may need specifying/clarifying is the return should indicate actual status i.e., MTD received indicates manual reads will be required initially the D0051 will have the appropriate information.</p> <p>Whilst it may then be implicit, this should be confirmation to Supplier from HHDC that actual reads will not be possible by the preferred retrieval method (if stated) & consequently potentially missing at SF.</p>
TMA	Yes	

Question 3: Will CP1543 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	1

Responses

Respondent	Response	Rationale
Drax	Yes	There could be process and system changes required to implement the solution. However, given the D0051 is already sent by some HHDCs to Suppliers, we anticipate any system impacts to be minor.
IMServ	Unsure	<p>It is unclear if this will affect our current business processes, namely:</p> <p>If a site is Unmetered, based on the incoming D155 from the Supplier, we issue the D0051 at this point (i.e. we don't wait for a D268 from the HHMO as we will not receive one)</p> <p>We do not send a D0051 if the D155 from the Supplier has a Retrieval Method of 'S'; again as we won't receive a D268 and also it would make no sense to do so.</p> <p>We do send a D0051 for all other sites once a D268 has been received.</p> <p>WE suspect that this Change Proposal will therefore have no impact.</p> <p>However, if a D0051 is required for Supplier Serviced Metering Systems, some development and testing would be required.</p>
Siemens	Yes	The impact on our system that processes HHDC Serviced MPANs is minor. There is, however, a greater impact on our system that processes Supplier Serviced MPANs as it is an additional flow that is not currently required to be sent.
SMS	Yes	As a HHDC we will need to make a change to our system to enable it to issue out the D0051, additionally we will need to add this requirement into our BAU processes and cover any D0051 output troubleshooting that may be required.
SSE	Yes	We currently have agreements with some HHDCs to provide the D0051 flows on receipt of the D0268. If

Respondent	Response	Rationale
		CP1543 was introduced the HHDC would be required to send the D0051 earlier in the appointment process with potentially incorrect information in the Retrieval Method field.
Stark	No	In routine use currently.
TMA	Yes	The functionality already exists, some minor changes will be needed to ensure flows are always sent.

Question 4: Will your organisation incur any costs in implementing CP1543?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	1

Responses

Respondent	Response	Rationale
Drax	Yes	In line with our response to Q3), we don't believe that any material system changes will be required because some HHDCs already send the D0051 to the Supplier. We expect to incur process costs in order to manage increased D0051 response volumes, but the net cost to Suppliers, given the reduced need for bilateral discussions with HHDCs and improved SF Settlement performance, is expected to be lower.
IMServ	Unsure	Based on the above assumptions we think little or no cost
Siemens	Yes	This will be a relatively low one-off cost to service the flow at a different point of the process for HHDC Served MPANs. It will incur a greater cost to service the flow for Supplier Served MPANs
SMS	Yes	One-off system update costs and ongoing flow management
SSE	No	
Stark	No	
TMA	Yes	Minimal one off costs to make the code changes described above.

Question 5: Do you agree with the proposed implementation approach for CP1543?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	Provided a final decision is reached in time for a minimum implementation lead time of 5-6 months, then the recommended implementation date of 4 November 2021 (as part of the November 2021 BSC Release) should be sufficient.
IMServ	No	
Siemens	Yes	
SMS	Yes	
SSE	Yes	
Stark	Yes	Agree with proposed implementation approach.
TMA	Yes	November is enough time to make the relevant changes.

Question 6: Do you have any further comments on CP1543?

Summary

Yes	No
2	5

Responses

Respondent	Response	Comments
Drax	Yes	In line with our response to Q2), we question the sequencing and timing between receiving the D0268 and sending the D0051. If the D0268 has not been received, there is a risk that the HHDC populates the Retrieval Method as "Not Known". In our view, the D0051 should only be sent once the HHDC knows if it can successfully dial the meter.
IMServ	Yes	We would like to thank Andrew and Gavin for helping clarify this CP on 06/05/21 and have amended our response in light of information gained.
Siemens	No	
SMS	No	
SSE	No	
Stark	No	
TMA	No	

BSCP502

Respondent	Location	Comment
Siemens	3.2.1.4	Send the D0051 after the D0268 is received in 3.2.1.3.
Siemens	3.2.3.3	No comment.
Siemens	3.2.4.6	As per first comment, send after 3.2.4.4
Siemens	3.2.7.7	As per first comment, send after 3.2.7.5
Siemens	3.3.1.3	As per first comment, send after 3.3.1.2
Siemens	3.3.11.2	Suggest the D0051 is not sent.
Siemens	3.3.12.2	Suggest the D0051 is not sent.