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CP Consultation Responses

CP1559 ‘Complex Site Process Improvements’

This CP Consultation was issued on 7 March 2022 as part of the March 2022 CPC Batch, with responses invited by 1 April 2022.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1	Supplier
E.ON/Next Ltd/Npower Commercial Gas Ltd.	3	Supplier, Supplier Agent
Salient Systems Ltd.	1	Consultant & NHHDC, HHDC/DA, MOA and Supplier Software Solutions provider
Siemens	1	Supplier Agent
Stark Software	1	Supplier Agent (HHDC, DA, NHHDC, DA)

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Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
British Gas	✓	✓	✓	✓
E.ON/Next Ltd/Npower Commercial Gas Ltd.	✓	✓	✓	✓
Salient Systems Ltd.	✓	✓	✓	✓
Siemens	✓	✓	✓	✓
Stark Software	✓	✓	✓	✓

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Question 1: Do you agree with the CP1559 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Yes	-
Salient Systems Ltd.	Yes	Resolves ambiguity associated with the aggregated consumption calculations of a complex site required under BSCP502 HHDC responsibilities
Siemens	Yes	Yes, standardising forms and mandating them will improve processes by reducing uncertainty/ambiguity.
Stark Software	Yes	-

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Question 2: Do you agree that the draft redlining delivers the CP1559 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	0	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
British Gas	Yes	-
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Yes	-
Salient Systems Ltd.	Yes	-
Siemens	Yes	-
Stark Software	Yes	• Believe the mandatory CSSIF with standardized format would help the accuracy of the complex site collection and aggregation. • The revised content of the CSSIF should reduce the risk of data discrepancy when there is any feeded status changed. • The mandatory Complex Site Validation Test should reduce the data discrepancy.

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Question 3: Will CP1559 impact your organisation?

Summary

High	Medium	Low	None
0	0	5	0

Responses

Respondent	Response	Rationale
British Gas	Low	-
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Low	We expect our primary impacts to be on obtaining and creating single Line diagrams for any of our existing complex sites that may be subject to change, (e.g. upon change of agent) as there may be issues with obtaining historic line diagrams given it has not been a been definitive requirement on pre-existing complex site arrangements, and so are here have not always been created and provided by the customer historically. To be clear we agree with the principle with the provision of line diagrams are required that is unique to the site the arrangement covers, however it should be noted that existing sites where the line diagram is not present are likely to require additional work to meet the requirement wherever a change prompts the requirement to include this information within the overarching meter technical details going forward.
Salient Systems Ltd.	Low	HHDC system changes to existing Complex Site functionality will be required to capture the additional data from the Complex Site supplementary information, and ensuring aggregated consumption data for the site is calculated accurately. This process will require system design, development and testing resource.
Siemens	Low	Low impact change to processes.
Stark Software	Low	Minor procedure update and process enhancement.

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Question 4: Will your organisation incur any costs in implementing CP1559?

Summary

High	Medium	Low	None
0	0	5	0

Responses

Respondent	Response	Rationale
British Gas	Low	-
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Low	Our assessment suggests that costs incurred will mainly be incurred through updating processes to include the new requirements as outlined, with some small additional costs to capture and include line diagrams as outlined under Q3.
Salient Systems Ltd.	Low	One-off cost covering the changes required to the HHDC system provided to our clients
Siemens	Low	Low impact change to processes
Stark Software	Low	-

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Question 5: Do you agree with the proposed implementation approach for CP1559?

Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	-
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Yes	It is sensible to align the implementation with REC0018 implementation to ensure that the CSSIF changes align across all impacted market participants, therefore we agree with the code managers recommended implementation date.
Salient Systems Ltd.	Yes	This approach builds on existing industry processes and therefore limits the impacts on all parties involved in the capture and notification of Complex Site meter configurations. Mandating the use of the Complex Site supplementary information form also confirms these configurations to the HHDC agent, which are essential for accurate aggregated consumption calculations.
Siemens	Yes	Yes, time and content seem reasonable given change size.
Stark Software	Yes	-

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Question 6: Do you have any further comments on CP1559?

Summary

Yes	No
4	1

Responses

Respondent	Response	Comments
British Gas	Yes	Our only concern about this is that with MHHS coming we need to ensure that no domestic sites fall into the Complex Site category because the use of the form would breach GDPR due to it being sent between parties via email. If the solution mandates the sending of the CSSIF by email and the form could contain personal data then there is a risk of breach of GDPR as email is not considered a secure data transmission mechanism. This is why SDEP was introduced in the first place. Removal of duplicate fields between the 'D0268 – Half Hourly Meter Technical Details' market message and the CSSIF;) – If this needs changes to D0268 , the new changed D0268 is not included in the consultation documents.
E.ON/Next Ltd/Npower Commercial Gas Ltd.	Yes	Whilst we are supportive of the proposed changes to the CSSIF it is our opinion that some content of the CSSIF could be better improved if it was moved to an auxiliary dataflow that aligns to the expectations and SLA's for receipt and exchange of the D0268 dataflow, as that will ensure that all of the information parties require to service, read and disseminate metered data into correct settlement data occurs in a timely fashion with the data exchange methods aligned. We note at this time the CSSIF and complex site arrangements are

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		generally put in place for a small number of HH metering systems across industry which at this time justifies not moving the CSSIF into a dataflow, however we believe that the use of CSSIF is likely to increase both as a consequence of the improvements that this change offers but also to facilitate bespoke arrangements that will arise on the path to the net zero.
Salient Systems Ltd.	Yes	Although the overall approach of CP1559 is necessary to 'clarify ambiguities related to the Complex Site process', the existing and future use of the Complex Site supplementary form in its current format, continues to impose 2 areas of possible human error when recording the information. The MOA (and future Advanced Metering Service) will be required to complete and record the supplementary information and forward to the HHDC (and future Advanced Data Service), the HHDC is then required to input the information manually into the HHDC system for calculation usage. It would be less prone to error and more secure to use a defined industry message flow ('D' or 'P' flow), which could be processed automatically into the HHDC system.
Siemens	No	-
Stark Software	Yes	As HHDC we hope the single line diagram required by MOA will not be an issue for the delay in sending the CSSIF when the D0268 indicates MPAN is a complex site.

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BSCP502 ‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’

Respondent	Location	Comment
Siemens	Footnote 3	I believe this is now an incorrect reference and think it is the first footnote in the BSCP.

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