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CP Consultation Responses

CP1590 ‘Enabling use of DTN agent appointments process for P434’

This CP Consultation was issued on 13 November 2023 as part of the November 2023 CPC Batch, with responses invited by 8 December 2023.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
Drax	4	Generator, Supplier, ECVNA and MVRNA
Npower Commercial Gas limited	2	Supplier, Other
Power Data Associates	1	Supplier Agent
Siemens	1	Supplier Agent
SMS Plc	2	Virtual Lead Party, Supplier Agent
SSE Energy Supply Limited	1	Supplier

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Summary of Consultation Responses

Respondent	Agree?	Impacted ?	Costs?	Impl. Date?
Drax	✓	✓	✓	✓
Npower Commercial Gas limited	✓	✓	✓	✓
Power Data Associates	✓	×	✓	×
Siemens	✓	✓	✓	×
SMS Plc	✓	✓	✓	✓
SSE Energy Supply Limited	✓	×	×	✓

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Question 1: Do you agree with the CP1590 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	We agree with the CP1590 proposed solution because we concur with the majority of respondents for the P434 consultation who stated that using the DTN would be the most appropriate method for bulk appointments, as it will reduce the need for manual work. We also note that the proposal aims to enable use of the DTN but does not mandate this option. As CP1590 will facilitate P434, there should be a positive impact for Relevant Objective c) Promoting effective competition in the generation and supply of electricity (so far as consistent therewith) promoting such competition in the sale and purchase of electricity. The change should ensure a smooth transition to the MHHS TOM for Unmetered Supplies improving data granularity and accuracy. We also believe that CP1590 will be positive for Relevant Objective d) Promoting efficiency in the implementation of the balancing and settlement arrangements because using the DTN for bulk appointments will reduce the need for manual interventions.
Npower Commercial Gas limited	Yes	No additional comments
Power Data Associates	No	Some elements of what this CP is proposing we agree with and understand the rationale, however whilst there isn't really any issue with documenting some of these steps in this way, in reality it doesn't change anything in respect of the current ability to use these messages. We agree with the proposal to introduce the use of the D0261 Rejection of Contractual Terms, and the D0011

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		Agreement of Contractual Terms, both between the HHDA/HHDC and Supplier, and those that include the MA role too for the same response messages. We agree on the basis, as is indicated in the CP, that this is against a Method of “Electronic of other agreed method” – because as has already been recognised the D0155 and D0148 Flows are not used today by most Suppliers to advise of appointments, and so it wouldn’t be expected that the MA would send a D0011 or D0261 to respond to an email. Additionally moreso so with the impending change in appointment process being brought about with MHHS, this allows the continuation of not using Flows today, should that be the position agreed between any combination of Supplier or Agent. The Consultation document calls out that the Data Transfer Catalogue already does not reflect that the D0155 and D0148 can be sent to the Meter Administrator Role with Role Code 4. Moving forward into the implementation of P434 – Suppliers and Meter Administrators are going to be agreeing contractual terms – and it is through these contractual agreements that we anticipate both parties will agree to the method used for agreeing appointment communications, be that use of the Flows, or continuation of any other agreed methods. Today for us, only 1 Supplier has ever provided the D0155 Flow to us over the DTN, and none have provided the D0148 over the DTN – every other Supplier has used email communications for this. As Meter Administrator though we can receive the D0155, and D0148 over the DTN, so long as the Supplier issues to our correct Role Code (4). In reality therefore, nothing is changing here on the Meter Administrator, except recognising that the D0261 and D0011 can be sent from the Meter Administrator back to the Supplier – these can and have already be sent today given MA is used in place of MOP for HH UMS. But again, its use will be agreed bi-laterally in each individual contractual relationship between the Meter Administrator (or other agent) and Supplier.

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		BSCP501 already calls out, that when HH UMS, the Meter Administrator should be entered in place of the MOP. This is why today, despite the Meter Administrator Role not being shown in the routing of the D0155 and D0148 Flows, it has still been possible for these to be sent to the Meter Administrator. More formally introducing the Meter Administrator Role onto the routing, may for some participants, cause a need for system changes, given its already being managed today through the current process of recognising the MA in place of the MOP. It is for this reason that given today 'it works', and that this isn't going to be the enduring appointment process (owing to MHHS), that limiting change, and just allowing the Supplier and Agent to agree how they want to work together, should continue to be the best approach. This CP has also introduced the D0302 to be sent to the Meter Administrator. There are no data items on this D0302 that are relevant to the Meter Administrator in their requirements to carry out the role – and so would suggest there isn't any requirement to introduce sending a Flow to the Meter Administrator that they will do nothing with.
Siemens	Yes	Option must be present for participants who wish to use the DTN to derive dataflows for industry requirements.
SMS Plc	Yes	As a HHDC HHDA, we welcome the ability to accept or reject an appointment request. Additionally, receiving the D0289 ensures accurate estimating and brings the UMS process inline with the Metered Supplier process.
SSE Energy Supply Limited	Yes	-

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Question 2: Do you agree that the draft redlining delivers the CP1590 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	1	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	Yes	No comment.
Npower Commercial Gas limited	Yes	No additional comments
Power Data Associates	Yes	Yes, what has been proposed is reflected in the red-lining.
Siemens	Yes	Outlined changes will deliver the objectives of the change.
SMS Plc	Yes	-
SSE Energy Supply Limited	No	3.1 – Establishment of a New UMS Inventory contains process for establishing NHH Inventory. We believe these changes should be effective from 01/04/24 and process for NHH Inventories removed, this will prevent the need to carry out further changes to BSCP520 after 01/04/24. Further amendments detailed below.

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Question 3: Will CP1590 impact your organisation?

Summary

High	Medium	Low	None
2	2	1	1

Responses

Respondent	Response	Rationale
Drax	Low	This would have a low impact to our business if we choose to utilise the DTN D0155 and to automate the sending of the D0268.
Npower Commercial Gas limited	High	Given we hold the largest market share of NHH UMS of any supplier by Mpan count we have a dependency on being on to automate the CoMC process for P434 migration, so formalising the ability for DTN derived dataflows to be exchanged is critical to our ability to conduct and complete the requirements set out under P434.
Power Data Associates	High	The impact would have been had regardless of CP1590 – given as a MA we need to agree with each Supplier the mechanism we will manage appointments between us.
Siemens	Medium	Removal of existing processes and implementation of new processes will require system changes and testing. Both MA and DC roles impacted.
SMS Plc	Medium	Updating systems to reflect the issuing of the D0011/D0261 and the receipt and utilising of the D0289 in all estimating processes.
SSE Energy Supply Limited	None	Implementation of P434 will impact our organisation, but there are no anticipated impacts directly due to the implementation of CP1590.

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Question 4: Will your organisation incur any costs in implementing CP1590?

Summary

High	Medium	Low	None
1	2	2	1

Responses

Respondent	Response	Rationale
Drax	Low	This would have a low cost impact to our business if we choose to utilise the DTN D0155 and to automate the sending of the D0268. These would be one-off costs if we decide to implement these changes.
Npower Commercial Gas limited	High	We have developed an automated CoMC solution so most of our costs fall under this, the main enable of this CP is formalising the DTN dataflow exchanged ass possibility and in turn enabling transparency for industry & service providers alike to have an awareness that the use of DTN is an option so that its clear DTN gateway can be configured to allow the exchange of the required CoMC dataflows over the DTN.
Power Data Associates	Medium	Managing more than one method of receiving appointment details (with different Suppliers most likely going to take different approaches), means we need multiple process' in place to manage this. This will include costs to develop loading the MPAN appointments. Because MHHS is coming changing the appointment process, this means these are nugatory one-off costs.
Siemens	Medium	Software changes to remove old steps and implement new steps, testing (unit, system, and regression), and deployment along with process changes to update, cascade and train.
SMS Plc	Low	-
SSE Energy Supply Limited	None	Implementation of P434 will lead to our organisation incurring costs, but no costs are anticipated to be directly incurred due to the implementation of CP1590

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Question 5: Do you agree with the proposed implementation approach for CP1590?

Summary

Yes	No	Neutral/No Comment	Other
4	2	0	0

Responses

Respondent	Response	Rationale
Drax	Yes	We agree with the proposed solution to update BSCP 520 Sections 3.1 to reflect the Agent appointment Data Flows that should be used for DTN-derived agent appointments, along with sections 3.4 and 3.5 for the same reasons. We also support the proposed 29 February 2024 implementation date because the solution needs to be in place before April 2024.
Npower Commercial Gas limited	Yes	No additional comments
Power Data Associates	Yes	Any agreed changes would need to be in place asap, given migration commences in April 2024.
Siemens	No	This change will require development and with the current expected release date (28/02) there is not much time to carry out the IA, dev and then test alongside other industry changes due in Feb and MHHS changes ramping up in 2024. Assuming 3 weeks lead for consultation to publication there's only 7-8 weeks and some of that covers Christmas/new year.
SMS Plc	Yes	-
SSE Energy Supply Limited	No	As detailed in Question 2, we believe this should be implemented on 1 st April 2024

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Question 6: Do you have any further comments on CP1590?

Summary

Yes	No
2	4

Responses

Respondent	Response	Comments
Drax	No	We have no further comments at this time.
Npower Commercial Gas limited	No	-
Power Data Associates	Yes	In Summary – amending the BSCP520 to recognise that the D0011 or D0261 could if required be sent is an understandable change to document just for greater clarity. But they can already be sent today and use of them, and the D0155 and D0148 as recognised will continue to be agreed bi-laterally between each Supplier and their respective agents.
Siemens	No	NA
SMS Plc	No	-
SSE Energy Supply Limited	Yes	Can you please confirm whether the new dataflow variants will be included in the EMAR.

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BSCP520

Respondent	Location	Comment
SSE Energy Supply Limited	3.1.12	D0148s not required at this stage as they are sent in 3.1.15
SSE Energy Supply Limited	3.3.1	Processes detailed in 3.1.13, 3.1.14 and 3.1.15 should be mirrored in this process
SSE Energy Supply Limited	3.4.1	D0148 not required here as it is sent in 3.4.4
SSE Energy Supply Limited	3.6.2	CoMC Process details the disconnection process twice but does not cover appointment of HH agents. Processes detailed in 3.1.13, 3.1.14 and 3.1.15 should be mirrored in this process.

Insert CSD Here

Respondent	Location	Comment

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