

CP REPORT – CP1410

MEETING NAME SVG 160

Date of meeting 3 June 2014

Paper number 160/07

Owner/author Claire Anthony

Purpose of paper Decision

Classification Public

Summary ELEXON invites the SVG to approve CP1410 'Transfer of Outstation Level 3 Passwords for advanced Meters' for implementation in the June 2015 Release.

1. Why change?

Background

Electricity supply standard licence condition 12 requires that, from 6 April 2014, Suppliers must not supply electricity at any Metering Point in Profile Classes (PCs) 5 to 8 other than through an advanced Meter¹.

Consequently, from that date, the Change of Measurement Class (CoMC) process from Non Half Hourly (NHH) to Half Hourly (HH) is likely to involve a NHH Meter which is already HH capable, assuming that the majority of Metering Systems changing from NHH to HH will be in PCs 5-8. In most cases a change of Meter will not be needed, and in many cases a site visit by the Meter Operator Agent (MOA) will not be required. Whilst the current BSC Procedure (BSCP) processes make some allowances for a CoMC with no change of Meter, they do not fully embrace the possibility that a CoMC can take place without the need for a site visit by the MOA.

The Profiling and Settlement Review Group (PSRG) asked ELEXON to review the CoMC process to ensure that the complexity (real or perceived) of the CoMC process does not act as a barrier to elective HH Settlement. [Issue 49 'Change of Measurement Class \(CoMC\) process for advanced Meters'](#) was raised on 24 June 2013 to look into this issue.

What is the issue?

One of the problems identified as part of Issue 49 relates to the transfer of the J1713 'Outstation Password Level 3' data item between the NHH Meter Operator Agent (NHHMOA) and HHMOA on a NHH to HH CoMC.

This data item is sent on the D0313 'Auxiliary Meter Technical Details' flow from the NHHMOA to the HHMOA, following a request from the HHMOA using the D0170 'Request for Metering System Related Details' flow. The 'Outstation Password Level 3' (in conjunction with the J1716 'Outstation Username Level 3' data item) will allow the advanced Meter to be configured, so effectively passes control of the Meter from the NHHMOA to the HHMOA.

NHHMOAs are, understandably, reluctant to lose control of the Meter too far ahead of their de-appointment date. HHMOAs, on the other hand, need to receive the D0313 flow far enough in advance of their appointment date to be able to:

- a) Determine whether they can support the existing Meter;
 - b) Decide whether they need to carry out a site visit; and
-

¹ A Meter which, either on its own or with an ancillary device, stores measured electricity consumption data for multiple time periods; and provides remote access to such data by the licensee.

CP REPORT – CP1410

- c) Arrange any necessary site visit.

This creates conflicting requirements from the NHHMOA and HHMOA, which can put the CoMC process at risk.

ELEXON raised Change Proposal (CP) 1410 'Transfer of Outstation Level 3 Passwords for advanced Meters' on 13 March 2014 to address this issue. This change has been raised separately to [CP1409 'Change of Measurement Class process for advanced Meters'](#), which is progressing the main Issue 49 solution. These two CPs are also independent of one another: i.e. CP1410 could be implemented without CP1409 and vice versa.

2. Solution

The Issue 49 Group agreed the following solution:

- The Supplier will informally de-appoint the NHHMOA and appoint the HHMOA;
- The Supplier will use a D0170 flow to ask the NHHMOA to provide the HHMOA with a D0150 'NHH Meter Technical Details' flow, a D0149 'Notification of Mapping Details' flow and a D0313 flow without the 'Outstation Password Level 3';
- The NHHMOA and HHMOA will bilaterally agree the method of transfer;
- The HHMOA will use the Auxiliary Meter Technical Details (MTDs) and commissioning details to decide whether a site visit is required;
- If the HHMOA needs the 'Outstation Password Level 3' password they will request it directly from the NHHMOA using a D0170 flow; and
- Two new values for the J0007 'Requested Action Code' data item will be introduced, via a Data Transfer Catalogue (DTC) CP under the Master Registration Agreement (MRA), to support the D0170 requests.

Although the NHH to HH CoMC process should be more efficient where the Metering System already has a HH capable Meter, these efficiencies will be lost if interoperability issues are allowed to stall the process. A two-stage process for transferring the Auxiliary MTDs will provide the HHMOA with the information needed in sufficient time to plan for the CoMC date, whilst allowing the NHHMOA not to surrender control of the Meter until their de-appointment date.

3. Impacts and costs

Central impacts and costs

CP1410 will require updates to the following documents, however there are no impacts on BSC Systems:

ELEXON estimated costs and potential impacts		
Document changes	System changes/impacts	Total
BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'	No system changes or impacts	1 man day equating to £240

Participant impacts and costs

CP1410 will impact Suppliers, NHHMOAs and HHMOAs. 10 of the 12 respondents to the CP Impact Assessment indicated an impact to the extent that there would be system and process changes required.

CP REPORT – CP1410

Five of the 12 respondents indicated that there would be costs associated with CP1410 and a further five respondents also indicated that there would be costs to implement the changes but noted that these are currently unknown.

Attachment B contains the full responses made by participants on the expected impacts and costs for CP1410.

4. Implementation approach

CP1410 was originally targeted for implementation on 6 November 2014 as part of the November 2014 BSC Systems Release, as this is the next available Release.

Six of the 12 respondents to the CP Impact Assessment disagreed with the proposed Implementation Date, whilst four agreed and two were neutral.

Two respondents noted that to fully implement the change, a DTC change would also be required and under the MRA process, any system change requires a minimum of a six-month lead time. The earliest possible Implementation Date for CP1410 would therefore be February 2015. Respondents also highlighted that as P272 has been pushed back to an earliest Implementation Date of April 2016, there does not appear to be an urgency to implement these changes in time for November 2014. It was also noted that given CP1410's relationship with [CP1409 'Change of Measurement Class process for advanced Meters'](#) and [CP1411 'Remove exemption from Proving Tests for Code of Practice 10 Metering Systems'](#) (also Issue 49 related CPs), it may be worth considering delaying the implementation in order to implement all three changes together so that development and testing effort can be combined.

Attachment B contains the full responses made by participants regarding the proposed Implementation Date.

After considering these responses, we believe that it would be more appropriate to implement CP1410 on **25 June 2015** as part of the June 2015 Release to allow participants more time to implement the changes.

5. SVG's initial views

ELEXON presented the New CP progression paper for CP1410 to the SVG at its 1 April 2014 meeting ([SVG158/04](#)).

An SVG Member noted that NHHMOAs are understandably reluctant to send the level 3 password through before their de-appointment date as it allows the HHMOA to re-configure the Meter before they are appointed, and while the NHHMOA is still responsible for the Meter. ELEXON clarified that there is no issue with sending the level 3 password on the de-appointment date, but the HHMOA needs access to other information in the D0150 and D0313 flows (such as communications details) to check that the Meter can be supported and to allow time to arrange an appointment with the customer if needed. ELEXON advised that the two-stage approach proposed in CP1410 provides the HHMOA with the information needed in sufficient time to plan for the CoMC date, whilst allowing the NHHMOA not to surrender control of the Meter until the de-appointment date.

An SVG Member raised a concern about the MOAs bilaterally agreeing the method of transfer. They expressed the view that concerns will be raised from NHH Automatic Meter Reading (AMR) providers as this change would be asking them to do something rather than explicitly telling them to do something. ELEXON confirmed that the actual transfer of data will be mandatory, but the method of transfer can be agreed between the agents themselves, and does not have to be via the formal DTC flows. However, the information will effectively be the contents of the D0313 (excluding the level 3 password) and D0150 flows, even if they are not formally sending the flows.

CP REPORT – CP1410

An SVG Member highlighted that the majority of NHHMOA to HHMOA transfers are within the same organisation so the timing of transfers could be agreed internally. ELEXON noted that only a small number of MOAs were solely qualified as NHHMOAs, so few changes of MOA will be enforced due to lack of Qualification. However, there will be some 'external' transfers between a Supplier's preferred NHHMOA and a customer appointed HHMOA. An SVG Member advised that the more formal approach of CP1410 was better suited to these transfers. ELEXON advised that it had considered that there would be concerns about whether the issue could be adequately managed internally in many cases, and this is why this has been raised as a separate CP to CP1409, which is progressing the main Issue 49 solution.

The SVG asked industry to note that it would not be making its decision on CP1410 until its 3 June 2014 meeting, so respondents should be particularly vigilant when responding to the consultation question on implementation timescales.

6. Industry views

ELEXON issued CP1410 for CP Impact Assessment via CPC00740. We received 12 responses of which six agreed with the CP, five disagreed and one was neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1410 in Attachment B.

Summary of responses for CP1410			
Organisation	Capacity in which organisation operates	Agree?	Impacted?
British Gas	Supplier, Supplier Agent	No	Yes
EDF Energy	Supplier, Supplier Agent	Yes	Yes
E.ON	Supplier, Supplier Agent	Yes	Yes
G4S Utility and Outsourcing Services (UK) Limited	Supplier Agent	No	Yes
IMServ Europe Limited	Supplier Agent	Yes	Yes
Opus Energy	Supplier	No	Yes
RWE Npower	Supplier, Supplier Agent	No	Yes
ScottishPower	Supplier, Generator, Distributor, Supplier Agent	No	Yes
Siemens Operational Services	Supplier Agent	Yes	Yes
SSE Energy Supply Ltd	Supplier, Supplier Agent	Yes	Yes
SSEPD	Distributor	Neutral	No
TMA Data Management Ltd	Supplier Agent	Yes	No

Some respondents commented that the change appears to propose a very complicated process and adds unnecessary confusion. One respondent noted that as a NHHMOA, they should be able to issue a single set of MTDs before the CoMC date which includes the level 3 details, on the understanding that the new HHMOA will not take control of the Meter until the CoMC date. Another respondent commented that they do not agree with the change as it has the possibility of introducing an agent into the market who would undertake activities on a Metering System to which they are not appointed.

ELEXON clarified that the HHMOA needs access to the D0313 flow before they are appointed to know whether they need to carry out a site visit, for example to change the Meter or install a new SIM card. They therefore need this information in advance of the CoMC date. However, at the same time the HHMOA should not be able to reconfigure the Meter until appointed, hence the need to send the D0313 flow early without the level 3 password and then again just before the CoMC date with the level 3 password.

One respondent suggested an alternative solution that the D0313 flow should not be sent in isolation and the existing DTC rules should be maintained; i.e. that the D0313 flow is always sent as part of a set including the D0149/D0150 flows.

ELEXON noted the suggestion but highlighted that sending two sets of identical D0149/D0150 flows would introduce unwanted redundancy.

Why should two D0170 flows be sent?

One respondent commented that the CP1410 solution is not efficient as it requires two D0170 flows to be issued and that it would be more logical for the NHHMOA to send the D0313 flow without the level 3 password on receipt of a D0170 flow and then send a second D0313 flow with the level 3 password on the NHHMOA Effective To Date (ETD). The respondent was concerned that under the current proposal, the HHMOA may not request or receive the level 3 password which could be an issue if there is a subsequent change of HHMOA.

ELEXON clarified that the reason for sending a second D0170 flow is to allow for the eventuality that the HHMOA may decide on receipt of the first D0313 flow that they cannot support the Meter type and will instead install a new Meter. Whilst this is not desirable from an interoperability and customer perspective, we understand that Meter replacements can occur. If the Meter is replaced and the HHMOA does not request the level 3 password, this will not create an issue for future HHMOAs. A single D0170 flow solution would work (the HHMOA could ignore the level 3 password), however this was not proposed under Issue 49.

How will the informal process be tracked and regulated?

Two respondents queried how the informal process will be tracked and regulated by Suppliers, MOAs and the industry as they were concerned that there would be no audit trail.

ELEXON clarified that it is not a substitute for the formal process, rather a pre-notification that the CoMC will be taking place before a firm date is known. ELEXON advised that this is already the current process operated by most Suppliers under [MRA Working Practice 66](#) 'Change of Measurement Class – NHH to HH'. The usual formal flows are still sent once the CoMC date is firm or has occurred and can be tracked and regulated by Suppliers, MOAs and industry in the normal way. The 'informal' de-appointment of the NHHMOA is a pre-notification that allows for the fact that the CoMC date may change if a site visit is needed because it is dependent on the customer.

ELEXON noted that it allows for the circular nature of a CoMC for advanced Meters: i.e. the fact that the CoMC date may be dependent on a site visit appointment being made, which is dependent on the HHMOA knowing whether they need to visit a site, which is dependent on the D0313 flow, which is dependent on the NHHMOA being de-appointed, which is dependent on the site visit date. However, ELEXON highlighted that not all Suppliers use the MRA Working Practice 66 approach as some will de-appoint, back out the de-appointment if the date changes and then de-appoint again. ELEXON noted that the draft redlined text supports both approaches.

Have the timeframes being imposed for quicker switching been taken into account?

One respondent was concerned that ELEXON had not taken the timeframes being imposed for quicker switching into account. ELEXON advised that CP1410 only applies to the NHH to HH CoMC process when not concurrent with a Change of Supplier (CoS), so the timescales for quicker switching do not apply. ELEXON clarified that the problem which CP1410 seeks to resolve only occurs on a non-concurrent CoMC. It arises when the need for a site visit has not been identified and the CoMC date is moveable. For a concurrent CoS-CoMC to work successfully, a firm date needs to be agreed. ELEXON noted that quicker switching is primarily aimed at domestic customers and straightforward switches which do not require site visits, customer appointments, potential commissioning tests, and proving tests. A concurrent CoS-CoMC would need high levels of liaison to work effectively.

Additional comments for SVG's consideration

One respondent noted that providing the outstanding level 3 password to the HHMOA "effectively passes control of a Meter from NHHMOA to HHMOA". The respondent commented that whilst this information may be necessary to establish the type of Meter to confirm if a site visit is required to re-configure it, there should be some provision that the new MOA should not be reprogramming a Meter before their appointed start date.

ELEXON advised that, subject to SVG agreement, a provision could be added to BSCP514 7.1.15.

Another respondent also commented that the sending of the MTDs from the old MOA to the new MOA on the date of the CoMC has no use as many agents only bring flows in from the gateway at certain times which could result in flows not being received until the evening or even the day after they are sent. The respondent highlighted that the requirement needs to ensure that the complete MTDs (including the level 3 details) are with the HHMOA the day before the proposed CoMC.

ELEXON advised that, subject to SVG agreement, this could be incorporated as it was acknowledged that the HHMOA might need to request the level 3 password a day earlier.

ELEXON agrees that the respondent's suggested changes would add clarity, and so we have incorporated them into the redlined text in Attachment A. We have highlighted in yellow the changes made following the CP Impact Assessment.

Comments on the proposed redlining

Only one comment was received on the proposed redlined text. A respondent noted that the explicit statement of bilateral agreement in BSCP514 7.1.12 is unnecessary as they would like to assume that this will be in a D0313 flow and can always be transferred using another means if required.

ELEXON advised that all flows can be sent via the Data Transfer Network (DTN) or by other means, but that the DTN is usually the default option. In the case of CoMC, ELEXON noted that the Issue 49 Group members wanted to make bilateral agreement the preferred option. This is because the HH systems are not always built to process NHH flows like the D0150, D0149 and D0313 flows, so some HHMOAs prefer other methods of data transfer.

ELEXON agrees that the respondent's suggested changes would add clarity, and so we have incorporated them into the redlined text in Attachment A. We have highlighted in yellow the changes made following the CP Impact Assessment.

7. Recommendations

Assessment review

A majority of respondents to the CP Impact Assessment agreed with CP1410, although a significant minority (five out of 12) did not. Although four respondents agreed with the proposed Implementation Date of 6 November 2014, six respondents disagreed with this approach.

CP REPORT – CP1410

Having considered all responses and those also received in relation to CP1409 and CP1411, we recommend that CP1410 should be approved but that it would be prudent to move implementation of CP1410 to the June 2015 Release for the reasons outlined in Section 4.

Recommendations

We invite you to:

- a) **AGREE** the proposed changes to BSCP514 for CP1410 (including the suggested amendments made following the CP Impact Assessment); and
- b) **APPROVE** CP1410 for implementation on 25 June 2015 as part of the June 2015 BSC Systems Release.

Appendices

None

Attachments

Attachment A – BSCP514 Redlining v0.2

Attachment B – CP1410 Consultation Responses

For more information, please contact:

Claire Anthony, Change Analyst

claire.anthony@elexon.co.uk

020 7380 4293