

Assessment Procedure Consultation 2 Responses

P302 'Improve the Change of Supplier Meter read and Settlement process for smart Meters'

This Assessment Procedure Consultation was issued on 16 January 2015, with responses invited by 6 February 2015.



Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/4	NHHDA, HHDA, NHHDC, HHDC
Opus Energy Ltd	1/0	Supplier
Imserv Europe Ltd	0/6	NHHDA, HHDA, NHHDC, HHDC, NHHMOA, HHMOA
Electricity North West	1/0	Distribution Systems Operator
RWE npower	6/6	Supplier, Generator, NHHDA, HHDA, NHHDC, HHDC, NHHMOA, HHMOA
Gazprom Marketing & Trading Retail Ltd	1/0	Supplier
Siemens Operational Services	0/3	NHHMOA/NHHDC
E.ON Energy Solutions	5/0	Supplier
ScottishPower Energy Retail	2/0	Supplier
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seeboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	7/11	Supplier, Generator, NHHDA, HHDA, NHHDC, HHDC, NHHMOA, HHMOA, CVA MOA
British Gas	5/0	Supplier

P302
Assessment Consultation
Responses

11 February 2015

Version 2.0

Page 1 of 72

© ELEXON Limited 2015

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
SSE	4/4	Supplier, NHHDC, NHHMOA

Question 1: Do you agree with the Workgroup that the draft BSC and CSD changes in Attachments A-C deliver the intention of P302?

Summary

Yes	No	Neutral/No Comment	Other
10	1		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	<p>We agree that the draft BSC and CSD changes in Attachments A-C deliver the intention of P302. We, however, have some questions.</p> <p>-In attachment B, the new steps for DCC serviced metering system, a D0010 is sent if the read is invalidated by the NHHDC. We understand that it is anticipated to occur only in a very small amount of cases. When the read is validated, only a D0086 is sent. In the legacy process the D0086 is sent for valid and invalid reads (3.2.6.24 and 3.2.6.23). Is there a reason between the difference in process?</p>
Opus Energy Ltd	Yes	-
Imserv Europe Ltd	Yes	N/A
Electricity North West	Yes	We believe the changes shown will deliver the intention of P302.
RWE npower	Yes	The proposals reduce the dependencies between the old and new supplier agents for a CoS with a smart meter and increase the accuracy of settlements, ensuring an actual remote meter reading is used for the CoS reading. The proposals also enable a CoS event to happen at the same time as a meter configuration change, a scenario which is very complicated in the existing traditional CoS process.
Siemens Operational Services	Yes	
E.ON Energy Solutions	No	We believe our alternative proposal detailed herein provides an improved way of managing this change whilst delivering the objectives of the BSC.
ScottishPower Energy Retail	Yes	-
EDF Energy plc;	Yes	We broadly agree that the changes deliver the

Respondent	Response	Rationale
EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		<p>intention of P302. However following more detailed consideration of the processes and the implications on our systems, we now believe that the intention of P302 would be better delivered if the D0010 dataflow, rather than the D0311, were used as the mechanism for the old Supplier to send reading information to the new Supplier.</p> <p>While the D0311 dataflow already forms part of the CoS process, and so seemed to be the ideal candidate for communication of the closing reading, this did not account for the following issues:</p> <ul style="list-style-type: none"> • A change would be required to the format of the D0311 to add Reading Method to enable estimated and actual reads to be differentiated on the flow. • A change would be required to the MRA to mandate the sending of the D0311 for non-domestic customers – this is likely to be very costly, especially for Suppliers that only support non-domestic customers or for those that have separate systems to support non-domestic customers. • A change might also be required to the MRA to amend the timescales for the sending of the D0311 for legacy meters to align with smart meters. <p>Within both the Proposed and Alternative solutions the D0311 is only used as a mechanism for sending reading information from the old Supplier to the new Supplier, in our opinion the D0010 would be a far lower cost option for this communication. This would only require the addition of a Supplier to Supplier instance of the D0010 (which is already proposed for the Alternative solution) and would avoid the need to make numerous consequential changes to the D0311 format and processes. D0311s could continue to be sent as now where no reading can be obtained by the old Supplier, and a D0010 would be sent instead of the D0311 where an actual reading is taken remotely.</p> <p>We believe there are significant cost savings to be made by using the D0010 instead of the D0311, and we think the wording of the CSDs should be updated to reflect this. We do not think this is a complex change to make, and such a change does not materially change the intent of the changes or the way that data will be processed in the Proposed</p>

Respondent	Response	Rationale
		<p>or Alternative solutions.</p> <p>We also have significant concerns about the use of the D0155 dataflow as the mechanism for the new Supplier to notify the new NHHMOA/NHHDC that the legacy process needs to be followed.</p> <p>We believe that adding further instances of the D0155 potentially adds additional complexity to an agent appointment process which is already quite complex, especially where agents are being appointed at quite short notice as a result of Faster Switching. We believe that mandating the sending of further D0155 dataflows has the potential to create issues in appointing Agents correctly and potentially lead to data not being included in settlement on an accurate basis. We consider that it would be better to use the D0170 dataflow as the mechanism by which Suppliers notify their Agents that they need to follow the legacy process.</p> <p>We believe there are significant cost savings to be made by using the D0170 instead of the D0155, and we think the wording of the CSDs should be updated to reflect this. We do not think this is a complex change to make to the red-lining, and such a change does not materially change the intent of the changes or the way that data will be processed in the Proposed or Alternative solutions.</p> <p>We do recognise that the D0155 has been indicated as the preferred mechanism for a number of Suppliers and so this could remain in the CSDs, however we believe that it should be possible for Suppliers and Agents to agree an alternative means of communication if that better suits them. We recognise that this can create complexity in cases where Suppliers or Agents need to support multiple interfaces, however at the same time it can and does enable more flexible means of communication between parties, especially where they are part of the same organisation.</p> <p>We believe that a precedent has been set for such agreement in the changes being made under CP1395 which enable Suppliers and MOAs to implement an 'alternative method, as agreed bilaterally between the Supplier and the NHHMOA'.</p> <p>We think the CSDS should allow two parties to bilaterally agree to communicate data via alternate means as long as the same outcome (especially in terms of settlement) is achieved. Parties should not</p>

Respondent	Response	Rationale
		<p>be precluded from using alternative methods of communication as long as the outcomes can be verified to be the same. In this case we believe that our systems and processes would work better if another dataflow (in our case the D0170) were to be used instead of the D0155. Other Suppliers may have different approaches that best suit their systems and processes. We believe that the red-lining should be updated to reflect this, or that a principle should be established across all CSDs that enables bilateral agreement of alternate means of communication. We would have significant issues with an outcome that makes the D0155 the sole mandated method of communication.</p> <p>We also have the following additional comments on the red-lined text:</p> <p>BSCP504 (Proposed Solution):</p> <p>3.2.6.35 to 3.2.6.39 – We think the disputed/missing read process should be as for current process, so steps 3.2.6.35 to 3.2.6.39 should be moved and start at what is current new step 3.2.6.59 and these steps should then be allowed for both legacy and DCC meters.</p> <p>3.2.6.47 – We think the timescales needs to be changed to SSD+5 in line with the proposal to re-date any SSC change made up to SSD+5 to the CoS date. The timescales for these actions need to be aligned. The legacy process mustn't be initiated while still trying to follow the smart process. To do so would just lead to confusion and error.</p> <p>3.2.6.43, 3.2.6.55 – As per our response to question 2, the requirement to respond within one working day does not provide sufficient time to analyse and address the volume of failures that typically occur, nor does it provide adequate time if flows are batch processed rather than processed in real-time. 3 working days would provide a more reasonable timescale.</p> <p>BSCP504 (Alternative Solution):</p> <p>3.2.6.35 to 3.2.6.39 – We think the disputed/missing read process should be as for current process, so steps 3.2.6.35 to 3.2.6.39 should be moved and start at what is current new</p>

Respondent	Response	Rationale
		<p>step 3.2.6.59 and these steps should then be allowed for both legacy and DCC meters.</p> <p>3.2.6.44 – We think the timescales needs to be changed to SSD+5 in line with the proposal to re-date any SSC change made up to SSD+5 to the CoS date. The timescales for these actions need to be aligned. The legacy process mustn't be initiated while still trying to follow the smart process. To do so would just lead to confusion and error.</p> <p>3.2.6.47 – This step should not be included in the Alternative solution. The new supplier should simply forward the reading containing the total and time of use registers to the old supplier; any validation or comparison of this reading should be performed by the old supplier.</p> <p>3.2.6.50, 3.2.6.51, 3.2.6.52, 3.2.6.55, 3.2.6.58 (3.2.6.56, 3.2.6.57) – As per our response to question 2, the requirement to respond within one working day does not provide sufficient time to analyse and address the volume of failures that typically occur, nor does it provide adequate time if flows are batch processed rather than processed in real-time. 3 working days would provide a more reasonable timescale.</p> <p>3.2.6.54: The use of the class average EAC should not be mandated. If the supplier receives a more accurate EAC (e.g. in the D0311 from the old supplier) then the supplier should have the option to use the EAC it holds in preference to the class average value.</p> <p>BSCP514 (Proposed and Alternative solutions):</p> <p>6.2.4.8 - This seems to be an error in the existing text, the dependency should be on 6.2.4.7 (receipt of the D0148) and not 6.2.4.6 (rejection of de-appointment by the current MOA)</p> <p>6.2.4.13 – We think the timescale needs to be changed to SSD+5 in line with the proposal to re-date any SSC change made up to SSD+5 to the CoS date. The timescales for these actions need to be aligned. The legacy process mustn't be initiated while still trying to follow the smart process. To do so would just lead to confusion and error.</p>

Respondent	Response	Rationale
British Gas	Yes	Yes, we believe that the changes as shown in attachments A-C will deliver the intention of P302.
SSE	Yes	-

Question 2: Are the timescales set out in BSCP504 for the alternative solution, where the old NHHDC validates the read and generate the D0086 data flow, achievable?

Summary

Yes	No	Neutral/No Comment	Other
6	3	1	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Other	The validation of the D0010 and issue of a D0086 within 1 WD is possible when the validation is automatic. If the read fails initial validation and needs to be reviewed, the D0086 might not be issued until 2 WD after the receipt of the D0010. These timescales can only be met if all other necessary flows have been received by the NHHDC.
Opus Energy Ltd	Yes	
Imserv Europe Ltd	No	It would appear that in step 3.2.6.50 the old DC has 1 working day to validate a D0010 and then within 1 working day send it on a D0086 flow. Due to the nature of reads arriving throughout the 24 hour day, the batch read validation process running once a day, suspect reads being assigned to users to investigate and either validate or fail – and then the D0086 processing to run and either use this read (if validated) or to presumably deem if not – we could not guarantee that all this could happen in 2 working days due to timing of batch processing and allowing time for any user intervention. It could well happen within 2 working days (especially if read is valid) but not necessarily.
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	We believe the old NHHDC will be able to validate the D0010 it receives and generate a D0086 in the timescales provided. However, if the meter reading fails validation, exceptions may not be resolvable within the 1WD timescale. We believe the more complex process will be for the old supplier to interpret the D0010 it receives from the new supplier containing the 48 register readings.
Siemens Operational	Yes	It will be an automated process to send out the D0086 flows triggered by receipt of the required dataflow, therefore to achieve the SLA we will be

Respondent	Response	Rationale
Services		dependent of the Supplier sending the dataflow by the required day.
E.ON Energy Solutions	No	We believe our alternative proposal detailed herein provides an improved way of managing this change whilst delivering the objectives of the BSC.
ScottishPower Energy Retail	Yes	-
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	No	<p>We do not believe the timescales set out, whereby the NHHDC has one working day from receipt of a D0010 to validate a reading and generate a D0086, are either achievable or required for the purposes of settlement.</p> <p>The proposed timescales would require significant changes to be made to our NHHDC systems and processes to enable D0086s to be generated in these timescales. Not only would this require a change to the batch process functionality of our NHHDC systems, but any readings that fail validation would need to be validated on the day they are received. As these D0010s would be indistinguishable from any other D0010s the validation processes for all reads would need to change, at significant cost. It is worth noting that there is currently no mandated timescale for validating and sending a D0010 within BSCP504.</p> <p>It is not clear why these timescales are required to support settlement. The old Supplier is able to validate the reading before sending it to its NHHDC and so the timescales are also not required to support timely billing.</p> <p>We believe that, if a timescale is to be prescribed, it should be set to a minimum of three working days. If Suppliers require reads to be validated faster for billing purposes they can arrange this bilaterally with their Agents.</p>
British Gas	Yes	Yes, we feel that the timescales as set out are achievable where the read passes validation checks. However, were the read to fail validation (which we would anticipate to occur less frequently for Smart metered customers) or if any unexpected delays were experienced, achieving a 1 WD SLA would be challenging. As such, rather than setting these timescales such that we will expect SLA failures, we would be open to extending this SLA to 2 WDs.

Respondent	Response	Rationale
SSE	Yes	As the NHHDC has until SSD+7 to validate the readings allowing the supplier 6 days to provide the readings.

Question 3: Are the timescales set out in BSCP514 for both the proposed and alternative solution, where the new MOA provides the MTDs, achievable?

Summary

Yes	No	Neutral/No Comment	Other
6	3	2	

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No comment	
Opus Energy Ltd	Yes	
Imserv Europe Ltd	No	Again due to batch timings and the potential need for user intervention we could not guarantee that a D0367 would be converted into new MTDs and be sent within 1 working day of receipt. If everything is valid and matches then it probably will, but we could not guarantee.
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	We are happy that this can be achieved subject to the agent appointments being completed prior to SSD.
Siemens Operational Services	Yes	It will be an automated process to send out the MTD flows triggered by receipt of the required dataflow, therefore to achieve the SLA we will be dependent of the Supplier sending the dataflow by the required day.
E.ON Energy Solutions	No	We do not believe these are needed with our proposed alternative solution
ScottishPower Energy Retail	Yes	From a MOP perspective the proposed process and timescales are achievable. From a Supplier perspective, we have a question about how the supplier should populate the meter serial number details within the D0367 dataflow in the absence of a D0150 from the MOP. Please see our response to question 24.
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy	Yes	We do believe that the timescales set out in the red-lined text for BSCP514 are achievable but they will be difficult to meet where there is any mismatch (for example in meter serial number) between the D0367 (or equivalent) received from the Supplier,

Respondent	Response	Rationale
Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		<p>and the D0149/D0150 received from the old MOA. On this basis it may be prudent to extend the timescale to 2 working days for the new MOA to send the relevant MTDs out. We do not believe that this would materially impact settlements, and Suppliers will already know how the meter is configured so they are less dependent on the receipt of MTDs from the MOA. Suppliers can bilaterally agree a 1 day timescale with their Agents should they require this to support their business processes.</p> <p>We note that the red-lined text for BSCP514 requires the Supplier to send a D0367 (containing the Meter Serial Number), however at this point in the process the Supplier will not know the serial number to be able to populate the D0367. This issue was discussed at one of the P302 workgroup meetings, and as a result a change is being raised by Energy UK to enable Suppliers to obtain the Meter Serial Number from the DCC's inventory. We believe that the current red-lined text for BSCP514 should be retained on the basis this change will be approved and the issue resolved, but note that a further change may be required to BSCP514 if that is not the case.</p>
British Gas	Yes	<p>Yes we believe that the timescales as set out are largely achievable, but again as stated above, in the event of any exceptions being generated, achieving a one day SLA could be challenging. As such, it might be appropriate, given it's difficult to see any impact on settlement, for the SLA to be 2 WDs for the MOA to issue the MTDs.</p>
SSE	No	<p>This is tight.</p> <p>The new NHHMOA will not receive the new Configuration D0367 flow until SSD or later.</p> <p>The new NHHMOA will need to convert this into a D0149/D0150, to send to the NHHDC.</p> <p>Therefore the NHHDC seem likely to receive the readings before they get the Meter Technical Details.</p>

Question 4: Are there any other potential Alternative Modifications within the scope of P302, which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
1	8	2	

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No comment	
Opus Energy Ltd	No	
Imserv Europe Ltd	No	
Electricity North West	No	
RWE npower	No	We have not identified any alternative proposals that could be developed by the working group at present. However, were the DCC to be included in the discussions then alternative proposals may be identified.
Siemens Operational Services	No comment	
E.ON Energy Solutions	Yes	<p>See attached schematic added to Q.24 OF this response, detailing our alternative proposals.</p> <p>Our proposal is that the old supplier should be obligated (on receipt of the D0058), to send a request to DCC to schedule a Billing Calendar Event (Billing Data Log Snapshot) to be activated for 00.00 hours SSD, on the smart meter.</p> <p>The Billing Data Log Snapshot contains both the Total Cumulative and 48 Register Reads from the smart meter and can be accessed by both the old and new supplier.</p> <p>This negates any reliance on either the old or new supplier to validate the meter readings taken at different times by both suppliers, as they are both referencing the same data point held in the meter. As a belt and braces approach we also suggest that the new NHHDC provides a copy of the opening read to the old NHHDC to double check.</p>

Respondent	Response	Rationale
		<p>We do however recognise that in instances where there is a delay in exchanging the security keys in the smart meter and reconfiguring by the new supplier that a small volume of energy continues to be used and will need to be accounted for in settlement. We do not believe the volume to be potentially great but it would be helpful if Elexon could provide some detailed analysis to aid understanding. This also raises an issue of how to manage the units consumed and recorded and how to process these through settlement. Suppliers could use the HH data log in the smart meter to determine when the energy was consumed to enter into settlement. Guidance would be needed on access to such data i.e. an assumption could be made that for this purpose use of such data would be covered by "regulated duties".</p> <p>We believe this approach will achieve the objectives of the BSC by promoting effective competition and if using the HH data log would ensure that accurate data is returned and input to settlements thus improving overall settlement accuracy.</p> <p>In addition on a wider industry basis we believe this proposal also assists with improving the switching experience for customers and can be applied to both gas and electricity CoS processes.</p>
ScottishPower Energy Retail	No	
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	No	We have not been able to identify any Alternative Modifications that are within the scope of P302, and which would be supported by the prescribed functionality of the DCC or of SMETS compliant smart meters. However as noted we believe that both the Proposed and Alternative Modifications should be amended to include different dataflows for means of communication, specifically replacing the D0311 with the D0010, and the D0155 (as a trigger for the legacy process to be followed) with the D0170.
British Gas	No	No, we have not been able to identify any further alternative modifications, other than those described

Respondent	Response	Rationale
		<p>in P302 or discussed during the workgroup meetings and assuming that changes to the DCC such that they communicate the same set of CoS reads to both the old and new suppliers, will not be possible.</p> <p>We do have some concerns over the suitability of the D0010 flow being used by in the alternative solution to communicate CoS readings to the old supplier. Given that this flow is used so extensively today and being core to a number of high volume business critical processes, we are nervous about changing this flow or extending its use further through the introduction of a supplier to supplier instance of the flow.</p> <p>We also feel that in the alternative solution, that the old supplier should be mandated to collect the midnight SSD read from the smart meter and send this to the new supplier via the NOSI flow. We appreciate that this is not required for read validation or billing processes, but feel that this would still be valuable to deal with exceptional circumstances where the new supplier is unable to collect a read via the DCC (whether due to communication issues or in the opt out or DCC to non DCC user churn scenarios).</p>
SSE	No	The two proposals on the table seem to provide the least complex route to meet the requirements of P302.

Question 5: What are the potential risks to Settlement for the proposed solution and the alternative solution?

Responses

Respondent	Response
TMA Data Management Ltd	The main risk to Settlement is the potential gap and overlap in energy if the closing and opening reads are not taken on the same day, in the proposed modification. The alternative solution could still end up with different opening and closing reads as the Old Supplier has the option to take its own read and send it to their NHHDC rather than use the read received from the New Supplier.
Opus Energy Ltd	There is a risk (albeit small) of missing units in the proposed solution if there is a timing gap between when the New and Old supplier obtain a reading.
Imserv Europe Ltd	<p>Proposed – the Old Supplier bills from the midnight read, the New Supplier bills from the reconfiguration read and the CoS Unallocated Units are “ignored”.</p> <p>Alternative - the Old Supplier bills from the midnight read, the New Supplier bills from the reconfiguration read and the CoS Unallocated Units are “ignored”.</p> <p>Our experience suggests Suppliers will have limited appetite to resolve minor differences in CoS reads, so where the CoS Unallocated Units are low these differences could potentially be ignored by the New Supplier (although you could argue that a small threshold of ignored CoS Unallocated Units is not a risk to Settlements).</p>
Electricity North West	<p>We agree with the Workgroups findings that as the old Supplier is reliant on the new Supplier identifying differences between the closing readings and the opening readings taken from the smart Meter, and to raise a MAP08 dispute where there is a mismatch. The risk of overbilling (both in Settlement and customer billing) is potentially higher than under the alternative solution, in which both Suppliers are using the same reading to open and close customer bills and Settlement liabilities.</p> <p>We also accept that the old Supplier is less dependent on the new Supplier under the proposed solution than under the alternative, so from this perspective, the alternative solution may carry more Settlement (and customer billing) risk.</p>
RWE npower	<p>Proposed</p> <ul style="list-style-type: none"> - Due to the complexity of the process there is a risk of error when the new supplier makes adjustments between the daily read log reading and the configuration reading. <p>Alternative</p> <ul style="list-style-type: none"> - The old supplier is dependent on the new supplier passing

Respondent	Response
	<p>the 48 register reading snapshot in a timely manner. Therefore the old NHHDC is dependent on both the new and old supplier completing processes that are brand new before it will hold the data it needs to be able to generate a CoS reading and distribute the D0086.</p> <ul style="list-style-type: none"> - There is a risk to Settlement if it is prescribed within BSCP504 that the opening CoS reading for the alternative solution must be an 'I' (Initial) reading. If the reading is not an 'I' it will not pass BSC validation or generate a D0019 opening EAC for NHHDA. <p>Common</p> <ul style="list-style-type: none"> - There are currently no Performance Assurance Techniques that monitor the transfer of data from the old and new supplier which both the proposed and alternative processes are dependent on. Whilst understanding this will be picked up by the Performance Assurance Board, we feel this should be addressed at this stage to ensure sufficient time to develop and implement the necessary techniques. - In the existing traditional process, the NHHDC agents are held accountable for ensuring the CoS process works smoothly and this is monitored through several Performance Assurance Techniques, e.g. BSC audit, Qualification and PARMS. There are no corresponding techniques to monitor the new obligations placed on suppliers to ensure that the CoS happens in a timely and accurate manner. - There is a general risk to Settlement as suppliers and their agents will be running two separate CoS processes at the same time (traditional and smart). This risk is amplified because of the ability to move between the smart and traditional process through the use of the D0155 and potentially D0151 flows. - There is a general risk to Settlement that a brand new CoS process involving large scale change for suppliers and their agents must be managed at the same time as the roll out of Smart meters. It is unlikely this processes will be perfect upon first implementation. As discussed in the working group, it should be expected that further change will be needed to the CoS process as it is embedded and further improvements are identified. - We feel that the Erroneous Transfer scenario poses a risk to Settlement. BSCP504 section 4.4.3 should be reviewed by the working group to ensure no further changes are needed in this area. BSCP504 as currently drafted prohibits the use of the D+1 CoS Reading in an ET scenario where there has been a change in the SSC. As a Smart Meter makes the change of SSC easier we feel it is more likely that this scenario could occur, meaning the ET process on a Smart Meter would not be able to use the D+1 process as it is. As such, we would like to understand how this is to be addressed to ensure no Settlement and no Customer impacts.

Respondent	Response
Siemens Operational Services	<p>Alternative Solution</p> <p><i>If the new Supplier configures the smart Meter after midnight UTC on SSD, any units consumed between the midnight UTC reading(s) and the readings taken on reconfiguration will effectively be billed to the old Supplier</i></p> <p>Reference the above statement – Where the new Supplier prices are cheaper than the old Suppliers this will potentially have a negligible detriment to the customer that may result in an increase in disputed reads. Will this have an impact on Settlements?</p> <p><i>For delays of up to SSD+5 WD, the new Supplier will re-date the SSC (and associated readings) to SSD. For delays of longer than SSD+5 WD, the new Supplier will adopt the old Supplier's SSC for the intervening period.</i></p> <p>Reference to the above statement – What if the new Supplier is unable to bill using the old Suppliers configuration?</p> <p>Will this have an impact on Settlements - Or is this just considered an accurate customer billing issue that is outside the scope of this consultation?</p>
E.ON Energy Solutions	<p>We are concerned that the proposal does not take into account the time it may take for security keys to be rotated and for the meter to be reconfigured by the new supplier. This will almost certainly result in differences in consumption between the old suppliers closing read and the new suppliers opening read.</p> <p>This would have the effect of needing the new supplier to effectively write off units consumed between the time of 00.00 hours SSD and the time the new supplier commissioned and reconfigured the smart meter. This is not good for a settlement perspective nor does this assist from a customer billing perspective.</p> <p>We recognise that this is also an issue with our alternative proposal but believe the greater transparency of the closing/opening reads to consumers improving integrity and trust in the process, outweigh the differences and potential additional processes needed for settlement purposes. We do not believe the volume to be potentially great but it would be helpful if Elexon could provide some detailed analysis to aid understanding.</p>
ScottishPower Energy Retail	<p>Proposed Solution Risks:</p> <p>There is a risk of units not being allocated to either Supplier at the CoS event given that the ability to settle accurately from SSD is dependent on ability to configure the meter remotely.</p> <p>Alternative Solution Risks:</p> <p>Delays in the creation of a D0086 reading for the losing supplier, caused by a failure by the new supplier to apply their meter</p>

Respondent	Response
	<p>configuration and retrieve an opening reading</p> <p>Agreed reads and adjustments to the D0086 reading could provide uncertainty to a certain degree where the new supplier cannot apply their configuration and the process reverts to the baseline process, resulting in an estimated D0086 reading that is subsequently disputed.</p>
<p>EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd</p>	<p>We believe that the Proposed solution creates the following risks:</p> <ul style="list-style-type: none"> • The risk that energy will be settled twice or will be unaccounted for, due to the Suppliers taking readings separately and needing to take a reconciliation process – in the Proposed solution this risk is higher than for the current baseline; this risk is also present in the Alternative solution but to no greater degree than the current baseline. • The risk that energy will be settled twice or will be unaccounted for due to the need for the new Supplier to calculate and account for the units used between the midnight reading and the reconfiguration reading. <p>As regards both solutions we also see that there is a risk that the class average EAC will potentially cause readings to be invalidated unnecessarily by the new NHHDC if the actual consumption is significantly different to the class average. However we believe that this risk is small and can be effectively mitigated by effective management of NHHDCs by Suppliers.</p> <p>We do not believe there are any other settlement risks created by the Alternative solution, relative to the current baseline.</p> <p>We believe that any risks that are created as a result of the Alternative solution are less significant than the Proposed solution, and can be effectively mitigated.</p>
<p>British Gas</p>	<p>As identified within the documents, we perceive there to be a minor risk within the proposed solution where both the old and new suppliers are independently collecting meter reads via the DCC and we suppose there is a potential for this to result in inconsistent reads being entered into settlement that would certainly require reconciliation to mitigate any potential risk to settlement. More significantly, we feel the added complexity within the proposed solution where the new supplier amends the settlement registers to account for any CoS unallocated units used between the midnight read and the reconfiguration read poses a greater threat and could lead to inaccuracies in the reads entered into settlement.</p> <p>The risks to settlement are reduced in the alternative solution, however we feel that the fact that the old supplier and its NHHDC are reliant upon the new supplier for the provision of the CoS read via a new flow also introduces some risk.</p>

Respondent	Response
SSE	Both proposed solutions utilise actual reads, and the need to reconcile the cumulative reading with each other, this ensures settlement is accurate and reduces the overall risks to settlement.

Question 6: What controls do you believe should be put in place to mitigate any associated risks?

Responses

Respondent	Response
TMA Data Management Ltd	The dispute process which already exists and would be initiated by the New Supplier, after receipt and review of the D0311, would mitigate the associated risk of overlap or gap in Settlement data.
Opus Energy Ltd	MAP08 (Disputed CoS read process) where appropriate, can still be used for any discrepancies that either the Old or New supplier believe they have.
Imserv Europe Ltd	The BSC Auditor should inspect a selection of CoS events each year and where Suppliers are found wanting on their CoS read reconciliations appropriate penalties should be enforced
Electricity North West	There are existing timescales in place that parties could develop processes around in the event that the change of supplier reading had not been received/sent.
RWE npower	<p>This falls under the remit of the Performance Assurance Board (PAB) who should be engaged as early as possible. The PAB can review the proposed process changes and make recommendations on how the Performance Assurance Framework should be amended to ensure it remains fit for purpose following fundamental changes to the CoS process. This review should include, but not be limited to, PARMS Serials and the BSC Audit. The proposed and alternate solutions developed by the P302 working group make fundamental changes to the way the CoS process operates within the BSC, we feel early engagement of the PAB is key to ensuring any approved implementation date can be met. Consideration should be given to the fact that for a period of time, two CoS processes will be operating concurrently and will need to be assured by the Performance Assurance Framework.</p> <p>Delaying engagement of the PAB until Authority approval (if approved) of P302 creates a risk that the necessary changes to the Performance Assurance Framework cannot be implemented in line with the go-live date of P302 or that the correct governance processes are not followed due to timing constraints.</p>
Siemens Operational Services	-
E.ON Energy Solutions	We believe our alternative approach detailed in answer to Q4 mitigates these risks.
ScottishPower Energy Retail	-
EDF Energy plc; EDF Energy	We believe that there is an effective control present in the process in the form of the customer, who is likely to initiate a query should

Respondent	Response
<p>Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd</p>	<p>there be a discrepancy between their closing and opening bills. Any errors that result in the old and new Supplier having different opening/closing readings are likely to be highlighted by the customer.</p> <p>We believe that, given the nature of the processes involved, it is not possible to implement effective reporting controls (such as PARMs) to determine whether settlement error is being created as a result of any changes.</p> <p>Within the scope of the Performance Assurance Framework we believe the most effective control to mitigate these risks would be the BSC Audit, supplemented by Technical Assurance of Performance Assurance Parties should the Risk Evaluation Register determine that the level of risk and strength (or lack of) controls indicate a requirement for it.</p>
<p>British Gas</p>	<p>To an extent the existing controls within the CoS process whereby the customer or either supplier can initiate the dispute process should partly mitigate against the risk of the old and new supplier utilising different closing and opening reads for billing / settlement processes.</p> <p>In the alternative solution, the new flow / instance of the D0010 through which the cumulative and settlement register reads will be passed from the new to the old supplier, could benefit from some reconciliation or reporting through PAB / BSC Audit to ensure that the new supplier is meeting its obligations and therefore not causing any issues or consumer detriment through the non or late provision of reads.</p>
<p>SSE</p>	<p>As Q5, we believe that the reconciliation of the cumulative reading Supplier to Supplier creates a control to mitigate any Settlement Risk.</p>

Question 7: Will P302 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
11	0	0	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	<p>P302 and its alternative would affect our systems and procedures.</p> <p>Systems would need to be modified to ensure they can process the changed D0155 flows, there might be some system processing modification in order to adhere to the flow completion timescales. The documentation related to these processes will require to be updated and of course, all changes will need to be tested and training carried out. We are satisfied that a lead time of 12 months between approval and implementation is planned for both P302 and its alternative proposal.</p>
Opus Energy Ltd	Yes	System, process and training changes will be required.
Imserv Europe Ltd	Yes	As a DC we will need to implement the new processes for either Old and/or New DC. As a MOP we will need to implement the new processes for either Old and/or New Mop. This will also require system changes to our in house DC systems and to our 3rd party provided MOP system. There will also be updates to documentation needed and staff training. There would be little difference between the size of the changes for the Proposed and the Alternative solutions.
Electricity North West	Yes	If either solution is accepted we would need to process two D0086 flows which would add complexity to the process and result in system changes.
RWE npower	Yes	<p>P302 delivers fundamental changes to the CoS processes regardless of whether the proposed or alternative solution is implemented. Either solution will see suppliers and their agents making significant system and process changes.</p> <p>Consideration should be given to the fact that industry will need to operate different CoS processes (for traditional and smart) concurrently so as well as developing the new processes, suppliers</p>

Respondent	Response	Rationale
		and their agents will need to ensure the existing CoS process operates as it should, without impacting Settlement or customer journeys.
Siemens Operational Services	Yes	<p><u>Both Solutions</u></p> <p>Updates to systems (& associated documentation/processes) that receive & process incoming industry dataflows to incorporate:-</p> <ul style="list-style-type: none"> • The additional field and any associated logic/rules within the D0155 for the introduction of the smart indicator (new data field) & receipt of a 2nd D0155 to trigger a switch between the smart COS process to the legacy COS process in the event of a failure to obtain a remote reading within the timescales specified for SSD • Any updates to the D0010 introduced to allow Supplier – Supplier flows and to capture all 48 time of use register readings as well as the cumulative register reading (if any NHHDC/MOA impact) <p>Updates to systems /processes/documentation to allow for parallel legacy COS processing and new proposed / alternative smart COS processing</p> <p>Updates to systems/processes/documentation to remove the need for validation against the reading history and latest EAC when acting as the new NHHDC for a COS reading received from the old NHHDC</p> <p>As the new NHHDC, COS meter reading validation will be done using the (initial) class average EAC from the old NHHDC so there will be updates required to systems /processes/documentation relating to this area</p> <p>Assumption – that any impact relating to the Smart Meter Configuration dataflow (D0367) is covered within CP3407 & CP1395</p> <p>A more detailed IA will be carried out following receipt of the associated industry change proposal</p>
E.ON Energy Solutions	Yes	There will be large scale changes to our internal systems to handle amended data flow(s) i.e. D3011 and potentially D0010 (in the proposed alternative

Respondent	Response	Rationale
		<p>in this consultation).</p> <p>This would need a large scale project to implement, as the changes will flow through a suite of systems used to manage CoS, including billing and customer information systems.</p>
ScottishPower Energy Retail	Yes	<p>ScottishPower operates as a Supplier, MOP and NHHDC.</p> <p>P302 will necessitate changes to ScottishPower internal business processes for each of these roles to take account of the differences between the change of supplier reading process for smart meters operated via the DCC and the baseline process, and changes to the related industry communications (e.g. revised agent appointment flows, the D0367 smart meter configuration dataflow, and whichever solution is used to pass the register TOU matrix readings from the new supplier to the old supplier)</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>The implementation of either of the solutions for P302 will have a significant impact on our organisation, as we operate in the roles of Supplier, NHHMOA and NHHDC, which are directly affected by these changes.</p> <p>In order to implement either of the proposed solutions we will have to make relatively significant changes to our Supplier and NHHDC systems to support new processes and dataflow interfaces. Changes will also be required to our MOA systems, but these are only incremental to the revised baseline being implemented as part of CP1395.</p> <p>We have not been able to undertake a detailed analysis of the impacts; however our high level view is that, specifically for our Supplier and systems, the system changes and testing required to support the Proposed solution would be approximately 50% more complex (and therefore costly) than would be required for the Alternative solution. The impacts on the NHHDC and NHHMOA systems are roughly the same for either solution.</p> <p>As well as any system changes we would also need to update our internal process documentation and deliver extensive training to our users in order to ensure the revised processes are implemented successfully. This would be required for both solutions, but again we think this would be 40-50% more costly for the Proposed solution as it is a more significant departure from the existing processes,</p>

Respondent	Response	Rationale
		<p>especially in regards to the new processes for the new Supplier; specifically reconciliation to the old Supplier's meter reading and calculation of the adjusted opening reading.</p> <p>While these impacts are significant, we do not believe there is a 'do nothing' option, and without any change the CoS process for smart meters has a significant risk of being more complex, more prone to error and more costly than the current baseline. We believe that the cost impacts that will be incurred will be outweighed by the benefits gained, both in terms of settlements and customer experience.</p>
British Gas	Yes	<p>Yes, both the P302 proposed and alternative solutions will impact our Systems and Procedures. Either solution will result in significant change being required to facilitate the concurrent operation of Smart and legacy processes, including but not limited to system design / development / testing, business process design and training and also furthermore an assessment of the impact to the customer and any associated customer collateral.</p>
SSE	Yes	<p>Yes. Supply, NHHDC and NHHMOA will be affected.</p>

Question 8: Will your organisation incur any costs in implementing P302?

Summary

Yes	No	Neutral/No Comment	Other
10	0	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The costs are one-off costs for development, testing and implementation. The costs are likely to be low to medium and would not vary greatly between P302 and its alternative.
Opus Energy Ltd	Yes	One-off system process and training costs will be incurred. There would also be costs associated with enhancing Agent contracts.
Imserv Europe Ltd	Yes	Most of the costs will be in system and documentation/procedure changes and staff training – so one off costs. There will be some ongoing costs but we see these as just being the same costs as the existing CoS processing now, just following slightly different processes. There would be no difference to costs whether part of a normal Release or not – and no difference based on solutions. At a high level we estimate these changes would involve 120 man days of effort.
Electricity North West	Yes	There will be costs if either solution is implemented as we will be receiving the same information from different market participants. We indicated this in our first consultation stating that this was a medium impact to the company.
RWE npower	Yes	Implementation of P302 will incur significant costs. At this stage we are yet to carry out a detailed impact assessment so are unable to provide costs. However, we expect the development and implementation to be complex and potentially costly.
Siemens Operational Services	Yes	Unable to confirm specific costs until a more detailed IA has been completed following approval of the relevant change proposal Anticipation is that any changes will be of a medium complexity / cost
E.ON Energy	Other	As detailed in answer to Question 7, a large scale

Respondent	Response	Rationale
Solutions		<p>project will need to be mobilised to implement the changes to our systems and test etc, this would be considerable as will take considerable resource and time to implement and test fully.</p> <p>Ongoing costs through the proposal and tabled alternative proposal will also be incurred to manage the differences created by inconsistencies in billing registers.</p>
ScottishPower Energy Retail	Yes	
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We have not been able to undertake a detailed analysis to generate accurate cost information; however we believe that we will incur significant costs in implementing P302. As noted above, based on high level analysis we believe that the costs of implementing the Proposed solution would be up to 50% higher than the Alternative solution.</p> <p>As above, while the costs of implementing either solution are significant, we do not believe there is a 'do nothing' option, and without any change the CoS process for smart meters has a significant risk of being more complex, more prone to error and more costly than the current baseline. We believe that the cost impacts that will be incurred will be outweighed by the benefits gained, both in terms of settlements and customer experience.</p>
British Gas	Yes	<p>Yes, we will incur costs to implement P302 to complete the activities as described above. It has not been possible within the consultation period to fully impact assess the changes required to our organisation, but we would expect to incur significant costs when implementing either of these solutions.</p> <p>Any costs associated with this change are likely to be one off capital expenditure costs for the design, development, testing and implementation of the chosen solution and any associated business process re-engineering and user training.</p>
SSE	Yes	<p>Yes. Supply, NHHDC and NHHMOA will be affected.</p> <p>There will be the need to implement amendments to;</p> <ul style="list-style-type: none"> Process – automatic and manual

Respondent	Response	Rationale
		<ul style="list-style-type: none">• Data<ul style="list-style-type: none">• • IT Systems.

Question 9: How long (from the point of Authority approval) would you need to implement P302?

Responses

Respondent	Response
TMA Data Management Ltd	The industry is experiencing a number of significant changes; we therefore require a lead time of 12 months. It would not be different for P302 and its alternative; neither would it be for a release outside of the normal BSC Release.
Opus Energy Ltd	Minimum of 12 months lead time.
Imserv Europe Ltd	12 months. To secure appropriate IT and internal resource to develop, test and implement these changes. No difference with regard to part of normal release or standalone. No difference re solutions.
Electricity North West	At least 6 months lead time for the proposed solution.
RWE npower	<p>RWE npower require at least one year implement. If implementation was after DCC go-live then an additional interim CoS process would be required which not be desirable due to the increased cost and complexity this would cause.</p> <p>We feel it is imperative that the Performance Assurance Board be consulted on the implementation period to ensure any necessary changes to the Performance Assurance Framework can be made without the governance processes being compromised. Our view is that the PAB should be consulted prior to the Final Modification Report being submitted to the Panel to avoid hurried and potential sub-standard development of the Performance Assurance Framework. We have seen in recent modifications that a number of 'unknown' consequential changes have been required following modification approval which is not ideal as parties require an element of certainty to allow development work to take place.</p>
Siemens Operational Services	<p>12 months for either proposed or alternative solution</p> <p>This will provide sufficient time in line with other scheduled development activity to carry out the development and test activities required to ensure a robust solution is implemented</p>
E.ON Energy Solutions	<p>We believe a minimum of at least 12 months is required to mobilise and implement the proposed change. In addition it is not clear at the time of responding what the new start date for services from the DCC will be.</p> <p>There is a clear dependency on the DCC to provided remote communications to smart meters to enable these proposals to work effectively. In this regard we believe it would be appropriate to ensure enough time is provided for the new DCC systems to bed in and be stable before introducing this large scale change.</p>

Respondent	Response
ScottishPower Energy Retail	-
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	<p>In line with our answer to question 8 the lead time required to implement the two options would vary, based on the increased complexity of the system changes required to support the Proposed option.</p> <p>In order to implement the system and process changes required to support the Proposed option we believe we would need approximately an 18 month lead time.</p> <p>In order to implement the system and process changes required to support the Alternative option we believe we would need approximately a 12 month lead time.</p>
British Gas	We would need a minimum of 12 months to mobilise a project to fully deliver the changes described in either solution.
SSE	A minimum of 12 months from Authority approval. We would need to see the formal modification to be able to elaborate further on this.

Question 10: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
9	1	0	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We are satisfied with the 12 months lead time recommended by the Workgroup.
Opus Energy Ltd	Yes	If an Authority decision is received on or before 29 June 2015, this would allow participants at least 12 month lead time to implement the necessary changes to their systems and processes by the recommended Implementation Date of 29 June 2015.
Imserv Europe Ltd	Yes	N/A
Electricity North West	Yes	The implementation date of 30 June 2016 seems reasonable.
RWE npower	Yes – with a caveat	Please see our answer to question 9.
Siemens Operational Services	Yes	Based on the solutions specified, the proposed timescales are acceptable to carry out any changes required for either the proposed or the alternative solution
E.ON Energy Solutions	No	No, as stated in answer to Question 9, there is a clear dependency on the DCC to provide remote communications to smart meters to enable these proposals to work effectively. In this regard we believe it would be appropriate to ensure enough time is provided for the new DCC systems to bed in and be stable before introducing this large scale change.
ScottishPower Energy Retail	Yes	The implementation date should be aligned with the implementation date for the DCC. The current DCC implementation date is March 2016 (+3 to 6 months)
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy	Yes	We agree with the implementation date of June 2016 on the basis that the option progressed is the Alternative option and that a decision is made by June 2015. We believe these changes need to be in place before the DCC goes live, otherwise we will

Respondent	Response	Rationale
Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		need to design a new set of processes for the short interim period between DCC go-live and implementation, at unnecessary cost.
British Gas	Yes	We agree with a June 2016 implementation date, subject to authority consent being received for the preferred option by June 2015 to allow 12 months implementation time.
SSE	Other	<p>SSE are concerned that the implementation date currently being proposed is being fixed unnecessarily, to accommodate an unknown DCC delivery date.</p> <p>SSE believe that this modification could allow a longer than the rule of thumb implementation timescales of 12 months, to ensure that this important Settlement process is effectively delivered by all the affected industry parties, and still deliver in time for the first DCC Serviced meters.</p> <p>As a minimum we would seek 12 months from Authority Approval.</p>

Question 11: Do you agree that a concurrent change of SSC on CoS should be treated as having taken place on the SSD, so long as the re-configuration of the Meter was carried out no later than SSD+5 WD?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	-
Opus Energy Ltd	Yes	However, there are risks with this as the Old supplier would not know that the SSC is changing. Therefore, it possibly means that the Old supplier should not raise their final invoice to that customer until SSD+5 at the earliest in case there is an SSC change and the final reading changes resulting in the customer experiencing a delay in the final invoice contradicting the Ofgem smarter billing objective to ensure timely final bills and rebates.
Imserv Europe Ltd	No	We view the 5 working days as being a carry over for when we allowed a "man in a van" a window for reading meters on CoS events. Surely with the advent of SMART and remote comms we should be changing this to only SSC changes on SSD – there is no reason why a Supplier should not be able to get the new config on the meter sometime on the SSD (comms permitting).
Electricity North West	Yes	This seems to be in line with current processes, so would appear appropriate.
RWE npower	Other	We agree that a concurrent change of SSC on CoS must be re-dated to the CoS date if the reconfiguration of the smart meter takes up to 5WD.
Siemens Operational Services	No comment	-
E.ON Energy Solutions	No	We do not believe this is required in our proposed alternative solution.
ScottishPower Energy Retail	Yes	The existing rules for Change of Supplier readings in BSCP504 sets the precedent that a reading taken

Respondent	Response	Rationale
		<p>within 5 working days of the Supply Start Date is equivalent to a reading taken on the Supply Start Date itself. This seems reasonable for smart.</p> <p>Based on the proposed and alternative solution, we would not expect a change of SSC on the SSD to follow the existing change of SSC process i.e. The MOP will only issue one set of D0149 and D0150 details with the new SSC, and the NHHDC will issue a D0086 flow, rather than separate Final and Initial D0010s for the old and new SSC.</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We agree that a concurrent change of SSC on CoS should be treated as having taken place on the SSD as long as the SSC change occurs by SSD+5. This is in line with current processing where the reading that is used as the D0086 could be taken on any date up to SSD+5, and will be copied to the CoS date. On this basis, the proposal is in line with the current baseline, and not a negative deviation from it, and should be included in both the Proposed and Alternative solutions.</p> <p>This element of the two proposals will also greatly simplify the processing required by NHHDCs and MOAs in relation to the CoS event. If this approach were not taken, any concurrent change of SSC on CoS that can't be enacted on the SSD itself will result in two sets of flows being sent to the new NHHDC by the MOA, for the old and new SSCs.</p> <p>Customers will also expect to only be billed to the new SSC that forms part of their contract with the gaining Supplier, rather than to the old SSC for a very short period and then to the new SSC.</p> <p>As part of adopting this principle Suppliers will need to ensure that their communications with customers are part of the CoS process and make the timescales and implications of this clear; we do not see this as being a barrier to implementing this process.</p>
British Gas	Yes	We believe that treating a concurrent change of SSC on CoS as having been completed on the SSD is a sensible approach and in line with the precedent set within the current arrangements where a CoS read obtained at SSD+/-5 WDs is dated for SSD.
SSE	Yes	From a settlement risk perspective this has to make sense, too much risk around changing SSC at SSD

Respondent	Response	Rationale
		+1 for example

Question 12: Which option do you consider most successfully mitigates the risks of under/over billing, delays in billing or re-billing? To what extent do these risks increase or decrease relative to the current arrangements?

Responses

Respondent	Response
TMA Data Management Ltd	P302 alternative proposal would most successfully mitigate the risk of under/overbilling, however, it makes the old Supplier reliant on the new Supplier to provide the final read and there is no guarantee that the Old Supplier will use the same reading for billing as the final reading can be obtained from the logs. It is likely that Old Suppliers will obtain the read from the logs in order to check the validity of the read provided by the New Supplier. It lowers the number of commands sent to the DCC but it might not change the level of involvement of the Old Supplier.
Opus Energy Ltd	The Alternate proposal reduces the risk of under or overbilling. However, there is a bigger risk in terms of the Old supplier being delayed in receiving their closing read and calculating any potential credit on the account – this goes against Ofgem’s faster switching goal in that a customer’s final bill should be sent out within 1 or 2 days of leaving a supplier as well as the smart billing objectives around timely and accurate final bills and rebates. Depending on the length of the delay the old supplier may need to estimate a final reading which is not in keeping with Ofgem’s smart billing objective to remove reliance on estimated reads. This potentially creates a situation when the consumer receives multiple final invoices.
Imserv Europe Ltd	Proposed – lots of risk of underbilling, less chance of delays and/or need to re-bill Alternative – less risk of underbilling, more chance of delays and/or need to re-bill (We do not believe there is any risk of overbilling on either of these solutions) Current – least risk of under/overbilling, most chance of delays and/or need to re-bill
Electricity North West	We believe that the alternative solution would mitigate the risks.
RWE npower	The proposed solution better mitigates the risk around delays to billing, especially for the old supplier. It breaks the dependencies between suppliers regarding the readings used for billing. This option could however, cause confusion surrounding the readings used on the final bill from the old supplier and the first bill from the new supplier as the readings may not be the same. The alternate deals with the issue of under / over billing as the readings on the bills should make it clear to the customer that they

Respondent	Response
	<p>have been billed accurately. This option is potentially slower however, as there is still a dependency between the new and old supplier.</p> <p>In theory these risks decrease in comparison to those carried by the current CoS process in relation to both speed and accuracy. However, as this is a new process a level of risk is still present. Overall we believe the alternate proposal more successfully mitigates the risk as it improves both speed and accuracy when compared to the current process.</p>
Siemens Operational Services	Siemens believe that the Alternative Modification would provide the better solution as it should reduce the number of reading queries between Suppliers compared with the Proposed Modification as they are both initially using the same set of figures. This should result in less re-billing. Either Modification should provide a more accurate and faster billing that currently as the need for using estimated reads is removed.
E.ON Energy Solutions	We do not believe either approaches effectively resolve the issue of over/under billing. Our alternative approach utilising the billing data log is we believe a fairer means of establishing an end and start point that both suppliers can easily access and process and will be more transparent for the consumer. In addition potential use of the HH data log to ensure accurate data is returned to settlement may mitigate settlement issues pre the introduction of HH settlement for these profile classes.
ScottishPower Energy Retail	<p>Under / Over Billing - The alternative option is marginally better at mitigating the risks of overbilling / overlapping billing by the respective suppliers.</p> <p>Billing Delays - The proposed option enables the losing supplier to obtain an actual reading on the Supply Loss date and to issue a final bill immediately. From a losing supplier perspective this is the most efficient option. From a gaining supplier perspective, both options are equivalent.</p> <p>Re-billing - A loss of connectivity with the meter that spans the supply start date will impact both options, particularly if the communications are not restored by SSD+4.</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation	<p>We believe that the Alternative solution most successfully mitigates the risks of customer under/over billing and re-billing, however the trade-off created is a potential slight delay in the timeliness of the closing reading.</p> <p>We believe that the Alternative solution more successfully mitigates the risks of under/over billing and re-billing because the processes works from a single set of readings actively provided by the new Supplier to the old Supplier. The old Supplier should not obtain closing readings by other means so there is less risk of it using a reading taken at a different time to the new Supplier. There is also</p>

Respondent	Response
<p>Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd</p>	<p>very little risk that the old and new Supplier will use different reads to bill the customer as the old Supplier would dispute the closing reading (as now) if it is not usable. The risks associated with the Alternative solution are essentially the same as the current baseline, but the reduction in data transfers should increase the likelihood that the opening and closing readings will match.</p> <p>Although the Proposed solution has a process whereby there is reconciliation between the old and new Supplier, there is a significant reliance on actions being taken appropriately by the new Supplier. The old Supplier is reliant on the new Supplier accurately carrying out any reconciliation against a reading the new Supplier has taken. The old Supplier is also reliant on the new Supplier accurately calculating the CoS Unallocated Units and accounting for any consumption accurately. This means the Proposed solution creates a more significant risk that the customer will be under or over billed compared to the current baseline.</p>
<p>British Gas</p>	<p>The alternative option better mitigates the risk of under / over billing, given that both the new and old suppliers would be billing to the same CoS read, obtained in a way that would not require complex smearing of CoS unallocated units or the exchange of additional data flows to support the reconciliation of opening and closing reads.</p> <p>From the perspective of the losing supplier, the alternative option could result in the closing bill being issued a couple of days later than under the proposed option, but we wouldn't consider this to be a material delay as it would still allow the closing bill to be issued near to the SED and significantly sooner than under the existing arrangements. This solution does however leave the old supplier in the position where they are dependent upon the new supplier for the timely provision of an accurate CoS read. We feel that relevant performance measures should be implemented under the alternative solution to address delays or potential non-receipt of the D0010 from the new to old supplier.</p>
<p>SSE</p>	<p>Proposed solution</p>

Question 13: Do you agree that the new Supplier should transfer readings to the old Supplier using a D0010 data flow? If not, what alternatives would you recommend and rationale for these?

Summary

Yes	No	Neutral/No Comment	Other
5	3	3	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No comment	-
Opus Energy Ltd	Yes	However, changes to the D0010, which is a fundamental CoS flow, are not ideal and would not be required under the proposed solution.
Imserv Europe Ltd	Yes	N/A
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	<p>We do not believe the D0010 is an ideal solution but we are not aware of a suitable alternative. If the D0010 flow is used as the format to pass the register readings between suppliers we believe the BSC Validation Status (J0022) should be shown as 'U' for not validated.</p> <p>We would like to understand whether there will be an agreed process for translation of the XML data? This needs to be considered due to concerns regarding how to map registers into D0010 format in a standardised way, using the XML data received from the DCC. This is needed to give assurance to the old supplier that the registers on the D0010 received from the new supplier are identifiable against the configuration they held.</p>
Siemens Operational Services	No comment	-
E.ON Energy Solutions	No	No we do not believe this is required. Please see our alternative solution.
ScottishPower Energy Retail	No	<p>We would prefer to send and receive these readings in the native DUGIS xml service request format. This would avoid the gaining supplier from having to translate the readings into a D0010 format, and allow the losing supplier to process the readings in</p>

Respondent	Response	Rationale
		<p>the native format in the same way as readings received directly from the DCC.</p> <p>The gaining supplier can use a number of different DUGIS service requests types to retrieve the TOU register readings and the total import register reading. If a decision is taken to pass these readings between suppliers in the native DUGIS xml format, it would be prudent to agree which DUGIS service(s) to use for this purpose.</p> <p>Potential service request types:</p> <p>4.1.2 "ReadInstantaneousImportTOUMatrices"</p> <p>Returns an instantaneous read for the Time of Use matrix but does not return the total import register.</p> <p>4.1.1 "ReadInstantaneousImportRegisters"</p> <p>Returns an instantaneous read for the total import register.</p> <p>4.4.2 "RetrieveCoMOrTariffTriggeredBillingDataLog"</p> <p>Returns both the TOU matrix and total import register recorded by the meter when the gaining supplier's tariff is applied to the meter.</p> <p>4.6.1 "RetrieveImportDailyReadLog"</p> <p>Returns the TOU matrix and the total import register at midnight on the date specified by the supplier.</p>
<p>EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation</p>	<p>Yes</p>	<p>We believe that the D0010 dataflow is the best mechanism for communicating meter reading information between Suppliers. As noted in our response to question 1 above we consider that this is actually a better mechanism for communicating reading information as part of the Proposed and Alternative processes than the D0311, as currently proposed, and should replace that flow in red-lined BSCP text.</p> <p>We do not think any other current dataflow would be more appropriate; and sending the reading data retrieved from the meter via the DCC in its 'raw' form is not a practical consideration at this time. However, as with all interactions under the BSC, we believe that two parties should be able to bilaterally agree to communicate data via alternative means as</p>

Respondent	Response	Rationale
(UK) Ltd		long as the same outcome is achieved. Parties should not be precluded from using alternative methods of communication as long as the outcomes can be verified to be the same.
British Gas	No	As stated above, we remain to be convinced that the D0010 is the most appropriate way for the new supplier to send the cumulative and tariff register reads to the old supplier and are open to alternative suggestions to address this – i.e. a new DTC flow, introduced specifically for this purpose or even the DCCs XML messaging that could be forwarded to the old supplier (we would need a proper assessment of the suitability of this option before agreeing to proceed with this as part of the solution).
SSE	Yes	This will help in mitigating CoS disputes and customer queries

Question 14: Do you agree that a third D0155 data flow is not needed when communications are restored, and that only the first D0155 data flow sent should have a corresponding D0151 data flow?

Summary

Yes	No	Neutral/No Comment	Other
7	2	1	1

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	<p>No we do not agree. As responded during a previous consultation, the NHHDC must be aware that the MPAN is DCC serviced, when the communications are restored. The new NHHDC is likely to become an old NHHDC when the MPAN changes Supplier and therefore should be aware that the NPAN is DCC serviced. If the flag is not updated, its usefulness is very limited as it cannot be relied on to be truly reflective of the MPAN's situation.</p> <p>We do agree that only the first D0155 should receive a matching D0151.</p>
Opus Energy Ltd	Yes	
Imserv Europe Ltd	Yes – 3rd D0155. No – no D0151s	Second D0155 just triggers the Legacy process – no need for a 3rd D0155. No D0151s are needed as these are contract updates.
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	No	<p>We do not believe that a third D0155 is required and therefore do not believe it should be mandated. Suppliers and their agents may wish to use this flow when communications are restored, but this should be agreed bilaterally between parties and not mandated for all.</p> <p>We feel a new field is required in the D0155 flow with the concept of the 'Smart Process Indicator'. There should be a valid set of either 'TRUE' or 'FALSE' which in turn will validate the subsequent process accordingly. This avoids the need for even more contracts floating about and complex changes required to derive processes from a contract reference.</p>

Respondent	Response	Rationale
		We do not believe the D0151 flow should be utilised as part of the CoS gain process unless agent de-appointment is occurring (e.g. where a supplier is using a different agent for their Smart and traditional work).
Siemens Operational Services	Yes	<p>Regarding the use of the legacy process concerns have be expressed:-</p> <p>How is new DC going to process the closing reads for the old Supplier? Will it have to roll back to old Supplier's configuration (assuming it has received that), process COS read then process new Supplier's opening read for a new configuration?</p> <p>See the comment in Question 24 relating to the impact on BSC Performance reporting of the use of additional D0155 dataflows.</p>
E.ON Energy Solutions	No	We do not believe this would be needed for our alternative proposal.
ScottishPower Energy Retail	Yes	<p>We agree that a subsequent D0155 flow is not required as part of the CoS gain process where communications are restored.</p> <p>When communications are restored suppliers may choose to update the MOP using a D0155 update notification or a bilateral flow. If suppliers choose a different set of agents for Smart vs Non-Smart meters a change of agent may be required, however this is not part of the core change of supplier process.</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seeboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We believe that sending further D0155 dataflows is not necessary to indicate communications are restored; as per our response to question 1 we do not believe that use of the D0155 to indicate that the legacy process should be followed will be appropriate for all Suppliers and their Agents.</p> <p>For the avoidance of doubt we believe that mandating the sending of further D0155 dataflows has the potential to create further issues in Agent appointment processes, and potentially lead to data not being included in settlement correctly. We think Suppliers should be permitted to agree an alternative method of communicating the relevant information bilaterally with their Agents.</p> <p>The re-instatement of communications after the legacy CoS read process has completed (which it must do once it is initiated) is similar to the</p>

Respondent	Response	Rationale
		installation of a smart meter in the first place. There are no mandated requirements in the BSCPs for this process as it is for Suppliers to agree with their Agents (especially their NHHDCs) how they notify them that a smart meter has been installed, and what actions they need to take as a result. We do not believe this needs to change as a consequence of these proposals.
British Gas	Yes	We agree that a third D0155 is not necessary to inform the agent that communications to a meter have been restored on the basis that the second D0155 simply triggers the smart legacy CoS process and does not serve as an instruction to permanently change terms.
SSE	Yes	We agree this is not needed, as this only adds more complexity. By not mandating its use, it does not stop Suppliers and their agents setting up an optional, bilateral arrangement to use a third appointment flow.

Question 15: Do you agree that the old Supplier should send an additional D0311 data flow in the event that it sends an estimated read following a communication failure (at SSD+3 WD) but is subsequently able to retrieve a midnight reading(s)? If so, should this be applied to both the proposed and the alternative solutions?

Summary

Yes	No	Neutral/No Comment	Other
4	5	2	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	It should be applied to the both proposed and alternative solutions.
Opus Energy Ltd	Yes (to each of the 2 questions above)	It makes sense, for both the proposed and alternative solution, to send a D0311 if the Old supplier is using a different closing read to that put in its original D0311.
Imserv Europe Ltd	Yes	Where an Old Supplier sends an estimate, the New Supplier needs to know if an actual is then retrieved. This is much more likely in the Proposed solution – we do not see estimates being necessarily sent in the Alternative solution
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	No	We do not believe that an additional D0311 data flow should be sent. We feel this adds unnecessary complexity to the new process, especially for the alternate solution where this flow will only be useful if the new supplier needs to instigate the underpin process. If communication failures of this type prove to be an issue then a Change Proposal could be raised at a later date. We also believe this flow should be optional for non-domestic Metering Systems but mandatory for domestic as per the traditional process.
Siemens Operational Services	No comment	
E.ON Energy Solutions	No	This would not be required in our alternative proposal
ScottishPower Energy Retail	No	The D0311 is useful to the new supplier in cases where they cannot establish communications with

Respondent	Response	Rationale
		the smart meter they have gained. When communications are re-established with the smart meter, the gaining supplier can retrieve their own readings from the meter for the date when the new configuration is applied, and for the SSD (from the daily read log, where the readings are still available).
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	No	We think the old Supplier should send a reading to the new Supplier if it is subsequently able to obtain one, and that this would apply to both solutions. However, as noted elsewhere in this response we think this reading should be sent using the D0010 and not the D0311, and this scenario further reinforces the benefits of using the D0010 as a means of communicating reads between Suppliers.
British Gas	Yes	This should certainly apply in the proposed solution where the D0311 plays a critical role in the read validation process to mitigate against any potential over billing. It's less critical in the alternative process as the only purpose the D0311 would serve would be for the provision of a read should the new supplier have had to revert to legacy process, which would likely have already happened by the time the old supplier was in a position to send a second D0311.
SSE	No	-

Question 16: Do you agree that the scope of the D0311 data flow should be extended to include DCC-serviced non-domestic Metering Systems and made mandatory for this solution?

Summary

Yes	No	Neutral/No Comment	Other
6	3	2	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	One consistent process for COS for DCC serviced smart meterings would be welcome. We note that PC5 to 8 sites will be settled HH before the DCC is live, so the extension of the use of the D0311 flow would only apply to sites in PC3 and 4.
Opus Energy Ltd	Yes	Use of the D0311, sent by the Old supplier to the New supplier, would be helpful because the New supplier will be able to validate the SSD opening read that it has obtained against the Old Supplier's reading/EAC and so avoid the risk of the Old and New suppliers working to different CoS reads supporting accurate opening and final bills. If there is a discrepancy between the New supplier's read and that provided by the Old supplier, this would trigger the New/Old supplier to instigate follow-up action which could ultimately enhance the integrity of Settlement together with CoS billing accuracy and customer experience. Without the D0311, there is a risk that if the Old and New suppliers' CoS reads differ, that any discrepancy could be picked up by the GSP Correction Factor rather than being accurately allocated to the relevant supplier.
Imserv Europe Ltd	Yes	For this to work it has to apply to ALL DCC serviced Metering Systems not just Domestic
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	No	We believe this flow should be optional for non-domestic Metering Systems as this is already a back stop process. To introduce this when it is currently not mandatory will create a large amount of change for what is essentially, a back stop process that may occur very rarely. If this type of communication failure proves to be an issue then a Change Proposal could be raised at a later date to mandate the flow for non-domestic Metering Systems.

Respondent	Response	Rationale
Siemens Operational Services	No comment	
E.ON Energy Solutions	No	This would not be needed if our alternative proposals were taken forward.
ScottishPower Energy Retail	Yes	This allows suppliers to develop a shared solution for Domestic and Non-Domestic meters at Change of Supplier.
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	No	<p>As noted in the answers to previous questions we believe that the references to the D0311 as a mechanism for sending reading information from the losing Supplier to the gaining Supplier should be replaced with the D0010.</p> <p>As noted previously this would avoid the issues that are associated with using the D0311 as the mechanism for this communication, one of which would be the need to mandate the sending of this flow, which would require changes to be made under the MRA. Non-domestic Suppliers will already have the ability to send a D0010 dataflow, and have no other use for the D0311 (or it would already be used for non-domestic customers). Use of the D0010 will therefore be a much lower cost approach to communicating these readings than the D0311, as currently proposed.</p>
British Gas	Yes	The use of the NOSI is a key feature of the solutions proposed to ensure the validation of CoS reads and also to support CoS events where the gaining party does not have the ability to retrieve the CoS read via the DCC. As such, we would agree with it being mandated for non-domestic DCC serviced meters.
SSE	Yes	This should be mandated for all metering systems enrolled in the DCC

Question 17: Do you agree that the midnight reading(s) need to be validated by the NHHDC, but do not need to be validated by the NHHDC before they are sent in the D0311 data flow to the new Supplier?

Summary

Yes	No	Neutral/No Comment	Other
8	2	1	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We agree that for fast transfer, the midnight readings would be sent in the D0311 before having been validated by the NHHDC. The proposed solution mentions that the Old Supplier should perform a preliminary check of the read against their read history. The Supplier would then issue a new command to the DCC to obtain another read if the read was found to be invalid by the NHHDC and the validation issue could not be resolved between the Supplier and the NHHDC.
Opus Energy Ltd	Yes (to each of the 2 questions above)	-
Imserv Europe Ltd	Yes	As long as Supplier has "validated" the read and is happy then in vast majority of cases DC will validate and this will become the D0086 flow. Exceptions can then be handled rather than delay ALL CoS reads for (expected) low exception rate
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	We do not believe the midnight readings need to be validated by the NHHDC before being sent in the D0311 flow as this would add unnecessary complication to the process. However, when either supplier sends the readings on to their NHHDC in the format of a D0010 the BSC Validation Status (J0022) should be shown as 'U' for not validated. We also believe that the Reading Type (J0171) field in the D0311 should be 'A' for Actual Change of Supply Reading.
Siemens Operational	Yes	Based on the likelihood that the meter reading taken will be accurate, agree that it can be used by the Supplier prior to being validated by the old

Respondent	Response	Rationale
Services		<p>NHHDC.</p> <p>There must still be a process in place to deal with any COS smart meter readings that subsequently fail validation – Assumption is that this will follow the existing disputed read process already in place (MAP08) with any suitable revisions to support the COS smart meter reading process</p>
E.ON Energy Solutions	No	This would not be needed if our alternative proposals were taken forward.
ScottishPower Energy Retail	No	Based on the statement in the P302 assessment procedure, we do not believe that the D0311 content needs to be validated by the losing supplier's NHHDC before being sent to the new supplier, however it would be useful for the supplier to perform some validation to check that the readings are consistent with its reading history.
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We do not believe that requiring the old NHHDC to validate a reading before it is sent to the new Supplier is necessary, and will only serve to slow down communication of that reading.</p> <p>For smart metering the Supplier is likely to have the most accurate view of whether a reading taken from a smart meter is valid, as they have access to more granular information than the NHHDC. As long as the old Supplier believes that a reading aligns with the reading/billing history for the customer, then it should send that reading to the new Supplier, without waiting for its NHHDC to validate the reading.</p> <p>This should not preclude the old Supplier from optionally getting its NHHDC to validate the reading before sending it to the new Supplier, however it would need to ensure that this can be done in time to enable the reading to be sent within 1 working day of it being obtained from the smart meter. This would require a bilateral agreement between the old Supplier and its NHHDC.</p>
British Gas	Yes	We do not see the need for the midnight reads to be validated by the NHHDC prior to being sent on the D0311 to the new supplier as based upon their read history the old supplier should be in a position to determine whether the read is consistent before sending it on. If the read was to fail supplier consistency check, we would not anticipate this read being forwarded to the new supplier.

Respondent	Response	Rationale
SSE	Yes	The NHHDC will not validate until SSD+7, and as a Supplier I would prefer to see the D0311 earlier than SSD+7 to check against readings we have received from the meter.

Question 18: Do you agree that the timescales for sending the D0311 data flow in the legacy CoS process should be brought forward to SSD+3 WD to align with the proposed smart process? Should this be applied to both the proposed and alternative solutions?

Summary

Yes	No	Neutral/No Comment	Other
6	3	2	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	The current timescales to send the D0311 from the New Supplier to NHHDC can take up to a maximum of SSD+23 days (SSD+8+10+5) as per BSCP504v34. We would like to see a lessening of the dependency on historical data for all sites not just Smart Metering sites serviced by the DCC, we therefore welcome the suggestion that NOSI flows could be sent by SSD+3WD.
Opus Energy Ltd	Yes	
Imserv Europe Ltd	Yes	It would seem sensible to keep these consistent
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	We feel that where possible, the CoS processes should be aligned for ease of development and use.
Siemens Operational Services	No comment	
E.ON Energy Solutions	No	This would not be needed if our alternative proposals were taken forward.
ScottishPower Energy Retail	Yes	-
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seeboard Energy Limited; Jade	No	As per our previous answers we no longer believe that the D0311 dataflow is the appropriate mechanism for the losing Supplier to communicate reading information to the new Supplier, given the complexity that this involves in terms of changing the format of, and rules associated with, the D0311. We believe that the current rules associated with the D0311 should not be changed and, as detailed in our previous answers, that the current references

Respondent	Response	Rationale
Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		to the use of the D0311 should be replaced with a D0010 where an actual reading has been obtained from a smart meter by the old Supplier. Where the old supplier has not been able to obtain a reading a D0311 would be triggered at the same time and with the same data as the current legacy process, as the meter is in effect in a legacy process at this point. We believe that this is a simpler and lower cost approach to communication of this information.
British Gas	Yes	-
SSE	No	Alignment makes sense, in the future, but not at this moment in time. As the programme progresses there will be a tipping point where this change makes sense to implement.

Question 19: Do you agree that where the old Supplier is unable to obtain a reading (under the proposed solution) that responsibility for requesting a reading should rest with the old Supplier, rather than having the new Supplier proactively identify that the old Supplier is missing a reading (by means of the D0311 data flow)?

Summary

Yes	No	Neutral/No Comment	Other
8	1	2	0

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	
Opus Energy Ltd	Yes	This provides a clear and immediately responsible participant.
Imserv Europe Ltd	Yes	Old Supplier cannot be made to rely on New Supplier who has little incentive to sort for Old Supplier – so Old Supplier must have ability to resolve via MAP08 Disputes Process
Electricity North West	Neutral	Not applicable to Distributors.
RWE npower	Yes	Although RWE npower prefer the alternate proposal, we agree that if the proposed solution was to be implemented the responsibility for obtaining the reading should rest with the old supplier.
Siemens Operational Services	No comment	
E.ON Energy Solutions	No	This would not be needed if our alternative proposals were taken forward.
ScottishPower Energy Retail	Yes	The midnight reading for the Supply End Date is stored in the daily reading log for 31 days and can be retrieved by the losing supplier automatically, provided the communications link has been restored. With the alternative proposal the gaining supplier is, in any case, responsible for providing a closing reading to the losing supplier.
EDF Energy plc; EDF Energy Nuclear	Yes	Under MAP08 the onus is currently placed on the old Supplier to initiate the missing reads process and we do not see any reason why this should

Respondent	Response	Rationale
Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		change as a result of these proposals. We assume that the old Supplier will consider the meter to be operating in the legacy process if it is not able to obtain a closing reading, and will follow the existing missing read processes defined in MAP08 as a result.
British Gas	Yes	The old supplier can initiate missing read processes as they would today in the event that they have not received a read from the new supplier or via the legacy process.
SSE	Yes	Keep it simple

Question 20: To what extent do you consider that each option supports fast accurate billing for both Suppliers? Do you consider that one option facilitates faster billing than the other, and if so, what is the likely magnitude of the difference (e.g. in days)?

Responses

Respondent	Response
TMA Data Management Ltd	P302 proposed solution would support fast accurate billing better than its alternative. The Old Supplier is responsible for obtaining the final read and therefore can obtain it as soon as available rather than wait for the New Supplier to send it via D0010 or other means, check it and raise a D0300 within 10Wd of SSD if no read has been received. The difference in days would depend on the Suppliers processing schedule and whether the missing read procedure has been initiated or not.
Opus Energy Ltd	The proposed solution better facilitates faster billing as it enables the Old supplier to obtain the CoS read directly and to potentially issue their final bill within very short timescales in accordance with the Ofgem smart billing objective to issue accurate and timely final bills. If the customer has a closed account credit balance this could help to speed up the rebate to the customer. However, under the alternative proposal for which the Old supplier is reliant upon readings from the New supplier there could be a delay in issuing the final bill and ultimately a delay in issuing any final credit due to the customer
Imserv Europe Ltd	Proposed – Fast and Accurate for Old, Fast and Accurate for New Alternative – Potentially slower for Old, Fast and Accurate for New (see Q11 – if SSD+5WD reduced to SSD only then more likely for faster and accurate billing for Old too)
Electricity North West	As one Supplier is obtaining the reading(s) you would expect the alternative solution to be more efficient.
RWE npower	Please reference the answer we gave in question 15. Overall both proposals provide a more accurate solution than today by using actual readings, either from the day of the CoS event or very close to it, rather than an estimated reading. We believe the alternative solution is more robust than the proposed and overall will provide a clearer view of the energy a customer is being billed for across suppliers. However, we feel that faster billing sits outside the scope of P302 as it is not a process governed by the BSC.
Siemens Operational Services	This question appears to be a repeat of Question 12. See Qu 12 for comment.
E.ON Energy Solutions	We do not believe either option has considered faster switching proposals effectively. We believe our proposed use of the Billing Data Snapshot would be more effective in supporting faster

Respondent	Response
	switching objectives.
ScottishPower Energy Retail	<p>The proposed option enables the losing supplier to obtain an actual reading on the Supply Loss date and to issue a final bill immediately. From a losing supplier perspective this is the most efficient option.</p> <p>From a gaining supplier perspective, both options are equivalent.</p> <p>Both options are dependent upon an active communication link with the meter, and the ability to retrieve a reading (and apply security keys and configuration settings as the new supplier) in good time.</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	<p>We believe that both options have the potential to deliver accurate billing for both Suppliers. We recognise that the Proposed Solution does have a benefit to the old Supplier in terms of the timeliness of the closing reading, and removal of the dependency on the new Supplier to provide it.</p> <p>However, as detailed elsewhere in this response, we believe that the Proposed solution is also more complex and costly to implement, and poses a greater risk in terms of under and over billing for the customer. We do not believe that the slight delay inherent in the Alternative solution (which should be 1 or 2 working days in the vast majority of occasions) justifies acceptance of this risk, or of the increased costs that will be incurred through implementation of the Proposed solution.</p> <p>We believe that implementation of the Alternative solution would still greatly improve the customer billing experience for customers with smart meters, compared to the current baseline, and that this is the option that should be progressed.</p>
British Gas	See response to question 12. Whilst the proposed solution would allow faster billing from a losing supplier's perspective, we do not think that the difference is material (i.e. a couple of days other than in exceptional circumstances where the new supplier fails to provide a read).
SSE	<p>The proposed option at least allows the old Supplier to obtain readings without having to wait for the new Supplier to send them on.</p> <p>As both rely on the D0311 NOSI to reconcile the Cumulative Reading, both equally allow for faster, more accurate billing.</p>

Question 21: Do you believe that the Proposed Modification better facilitates the Applicable BSC Objectives than the baseline?

Summary

Yes	No	Neutral/No Comment	Other
9	2		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We agree with the Workgroup that the Proposed Modification better facilitates Applicable BSC Objective D.
Opus Energy Ltd	Yes	
Imserv Europe Ltd	No	Objective c) – No - we believe that having different CoS processes for SMETS2 meters (either Smart or Legacy options), SMETS1/NSS meters and dumb meters introduces additional complexity and complication to Suppliers and Agents and would be a barrier to more effective competition. Objective d) – No - having multiple different CoS processes would not lead to more efficient balancing and settlement arrangements – and these will be in place for the next ten years
Electricity North West	Yes	We agree with the working group’s view.
RWE npower	Yes	We feel that the proposed solution is neutral against BSC Objective ‘C’ – we do not feel it improves competition any more than the existing baseline. However, it doesn’t reduce competition. We feel that the proposed solution better facilitate BSC Objective ‘D’ as it increases the use of actual readings in the CoS process. There is also a reduction in dependencies between parties which speeds up the process.
Siemens Operational Services	Yes	It should facilitate consumers to switch Electricity Suppliers quicker than under the baseline process (BSC Objective C) and improve the accuracy of Settlement (BSC Objective D)
E.ON Energy Solutions	No	No. However we believe our proposed use of the Billing Data Snapshot would better facilitate these objectives.
ScottishPower	Yes	

Respondent	Response	Rationale
Energy Retail		
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We believe that the Proposed Modification is an improvement to the current baseline for the generation of CoS readings for smart meters. Based on our analysis we believe that the current baseline will lead to an increase in the complexity of the process for generating CoS readings and a resultant decline in performance. We do not believe this decline in performance combined with an increase in complexity is acceptable for settlement, or for customers with smart meters.</p> <p>We believe that the Proposed Modification better facilitates objective (d) because it will improve the efficiency of the process by reducing data transfers which would otherwise increase as a result of smart metering, also increasing failure and intervention rates. P302 should enable CoS reads to be generated more quickly and cost effectively, improving the efficiency of the process.</p>
British Gas	Yes	-
SSE	Yes	-

Question 22: Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the baseline?

Summary

Yes	No	Neutral/No Comment	Other
7	3	1	

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We agree with the Workgroup that the Alternative Modification better facilitates Applicable BSC Objective D.
Opus Energy Ltd	No comment	-
Imserv Europe Ltd	No	Objective c) – No - we believe that having different CoS processes for SMETS2 meters (either Smart or Legacy options), SMETS1/NSS meters and dumb meters introduces additional complexity and complication to Suppliers and Agents and would be a barrier to more effective competition. Objective d) – Yes – the continuity of having the New Supplier driving the CoS read has synergies with the existing baseline (dumb) process and would potentially increase overall efficiencies due to not having to transfer Meter Read History between old and new DCs Overall - No
Electricity North West	Yes	We agree with the working group’s view.
RWE npower	Yes	We feel that the alternate solution is neutral against BSC Objective ‘C’ – we do not feel it improves competition any more than the existing baseline. However, it doesn’t reduce competition. We feel that the proposed solution better facilitate BSC Objective ‘D’ as it increases the use of actual readings in the CoS process. There is also a reduction in dependencies between parties which speeds up the process.
Siemens Operational Services	Yes	It should facilitate consumers to switch Electricity Suppliers quicker than under the baseline process (BSC Objective C) and improve the accuracy of Settlement (BSC Objective D)
E.ON Energy	No	No. However we believe our proposed use of the Billing Data Snapshot would better facilitate these

Respondent	Response	Rationale
Solutions		objectives.
ScottishPower Energy Retail	Yes	
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seeboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>As with the Proposed Modification we believe that the Alternative Modification is an improvement to the current baseline for the generation of CoS readings for smart meters. Based on our analysis we believe that the current baseline will lead to an increase in the complexity of the process for generating CoS readings and a resultant decline in performance. We do not believe this decline in performance combined with an increase in complexity is acceptable for settlement, or for customers with smart meters.</p> <p>We believe that the Alternative Modification better facilitates objective (d) because it will improve the efficiency of the process by reducing data transfers which would otherwise increase as a result of smart metering, also increasing failure and intervention rates. P302 should enable CoS reads to be generated more quickly and cost effectively, improving the efficiency of the process.</p>
British Gas	Yes	-
SSE	No	-

Question 23: Do you believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the Proposed Modification?

Summary

Yes	No	Neutral/No Comment	Other
7	4		

Responses

Respondent	Response	Rationale
TMA Data Management Ltd	No	The Alternative Modification is on paper simpler than the Proposed Modification, however, we do not agree with the reliance on the New Supplier from the Old Supplier to obtain a read. The Alternative Modification only lowers the number of commands sent to the DCC but is not truly reducing the number of steps for the old Supplier compared to the Proposed Modification.
Opus Energy Ltd	No	We do not support the Alternative Modification whereby one supplier would be responsible for retrieving the midnight readings from the daily log and passing these to the other supplier. This is because Old and New suppliers will have priority actions for their element of the process which could potentially result in a delay of transfer of information to the other supplier, for which there is no contractual relationship and therefore no incentive to relay the information in a timely manner. Although there are proposed timescales for this activity, it appears likely that the read process would be swifter as well as more robust with the proposed solution for which both the New and Old suppliers are directly incentivised to gain timely opening and closing CoS reads respectively. This also means that both suppliers are able to better track their progress and take responsibility for their performance against the smarter billing objectives proposed by Ofgem for the benefit of the customer.
Imserv Europe Ltd	Yes	The Alternative has less complications and less chance of one Supplier not knowing which CoS process the other Supplier is following as the New Supplier is "driving" the CoS read process (as in the baseline). So more synergy with baseline and less overall permutations and chance of confusion.
Electricity North	Yes	We agree with the working group's view.

Respondent	Response	Rationale
West		
RWE npower	Yes	Yes – we feel the alternate solution doesn't require readings to be amended and maintains one unadjusted reading as the CoS reading. We feel this is more efficient than the proposed solution.
Siemens Operational Services	Yes	Having fewer flows and interfaces than the Proposed Modification there is less room for error in the implementation and operation of the process for the Alternative Modification.
E.ON Energy Solutions	No	We believe our proposed use of the Billing Data Snapshot would better facilitate these objectives.
ScottishPower Energy Retail	Yes	The alternative modification is less time-bound than the proposed modification - it allows the new supplier to configure the smart meter up to SSD+5 and process the readings and configuration details as though the meter was configured on the SSD.
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd	Yes	<p>We believe that the Alternative Modification better facilitates the Applicable BSC Objectives than the Proposed Modification because it delivers materially similar outcomes but at a lower cost and with a lower degree of complexity.</p> <p>The key issues with the Proposed Modification are:</p> <ul style="list-style-type: none"> The need to have a reconciliation process (using dataflows and undertaking reading comparisons) to ensure both Suppliers are using readings taken at the same point in time – this has clear risks, increases cost and may actually delay the overall end to end process. The need for the new Supplier to calculate and account for the units consumed between midnight and the point at which the smart meter is configured to any new tariff configuration – again this has clear risks and increases cost. <p>While the Proposed Modification has the benefit of removing the old Supplier's dependency on the new Supplier for their closing reading, it does so by placing obligations on the new Supplier to undertake reconciliation against the reading provided by the old Supplier, and to undertake calculations that effectively 'make up' reads to account for consumption in settlement.</p> <p>This not only means the Proposed Modification has</p>

Respondent	Response	Rationale
		more risk associated with it, but also more cost, which we believe could make the Proposed Modification 50% more expensive to implement than the Alternative Modification. We do not believe that this risk and cost is justified by the marginal benefit that the Proposed Modification delivers in terms of speed of availability of a final reading, and therefore timeliness of the issuing of a final bill to a customer.
British Gas	Yes	We believe that the alternative solution would provide a cleaner CoS process without potentially complex business rules to identify and account for CoS unallocated units, without adding a material delay to the old supplier's ability to generate a final bill. The alternative should pose less risk to settlement and to the consumer billing experience, providing we implement the right level of governance and control around the new supplier to supplier D0010 (or alternative).
SSE	No	-

Question 24: Do you have any further comments on P302?

Summary

Yes	No
7	5

Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	
Opus Energy Ltd	No	
Imserv Europe Ltd	Yes	<p>We believe that in this time of significant industry change, one of the worst things that can happen is we introduce either of these complicated changes and end up in a position where the 2 Suppliers and 4 agents involved in a CoS event have no real idea of which of the CoS processes (dumb, NSS/SMETS1, SMETS2 Smart, SMETS2 Legacy) is being used for a particular CoS event and ending up with multiple D0086s, no D0086s, mismatching D0086s etc.</p> <p>The existing baseline might have its drawbacks and issues – but at least they are understood and implemented and to introduce significant potential for the customer CoS experience to get worse – at a time when we are trying to get buy in and establish customer trust in Smart meters - would be a mistake.</p> <p>We would prefer to see these proposals delayed until the Smart rollout has begun, the DCC is live and we have some real life experience of the Smart CoS process. Will register mapping issues be a thing of the past or will Suppliers and MOPs misinterpret D0367s? Will all reconfigs happen so close to midnight on the SSD that the CoS Unallocated Unit issue becomes de minimis? Will all midnight reads from Smart meters always be validated by DCs and everything run smoothly or will there still be scope for Suppliers and DCs to become out of synch with reading patterns?</p> <p>By delaying we will then be able to introduce a much more appropriate and justifiable modification.</p>
Electricity North West	Yes	The only reference to the impact on LDSO's is regarding the potential impact on the receipt of D0086's. As indicated in our first response and re-

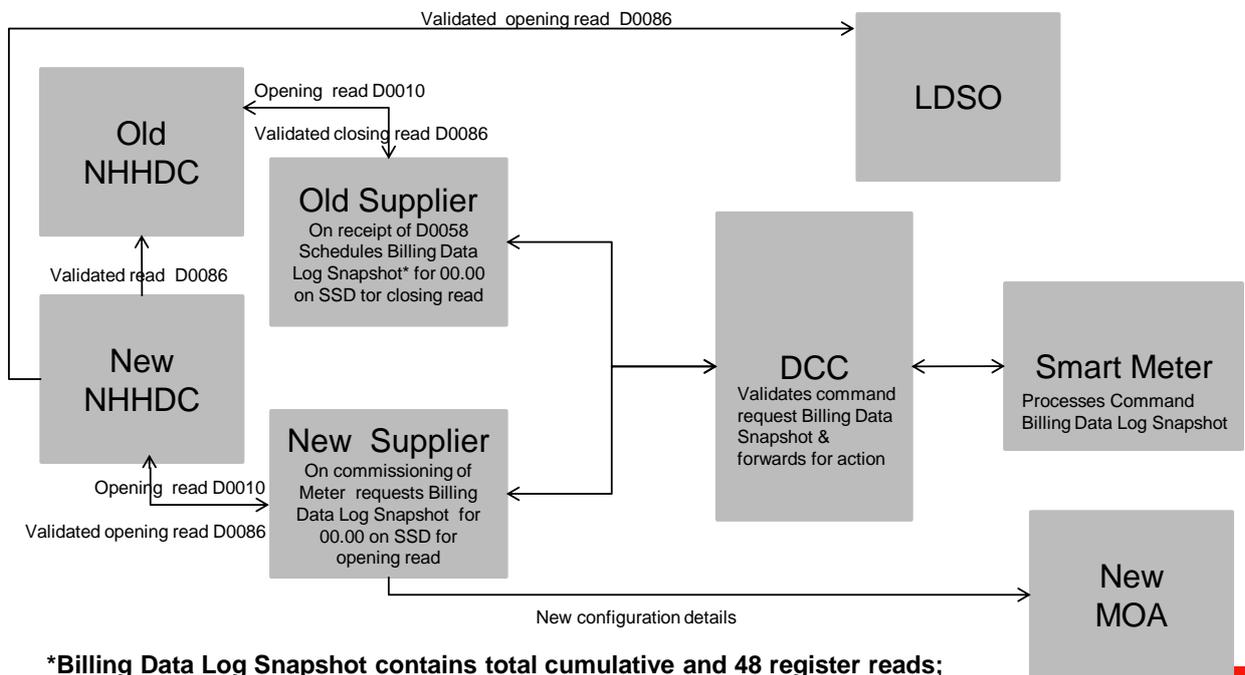
Respondent	Response	Comments
		<p>iterated in this response, this will cause us a change to the process and IT system supporting the change of supplier process. It is further exacerbated by the back-up legacy processes still being required in the case of the lack of communications being available. On the latter there is no notification to the LDSO that the legacy process is to be followed and as such may cause confusion as to whether one or two data flows are expected. It would be more practical, and result in no business and IT impact, for the LDSO to only receive one D0086, and that being from the new NHHDC as per the existing process.</p>
RWE npower	Yes	<p>As mentioned in response to earlier questions, we feel engagement of the PAB at this stage is essential. Not only would it allow the PAB to start developing necessary changes to the Performance Assurance Framework, it would also give them the opportunity to highlight any potential constraints that may materialise should parties deem that the proposed and alternate solutions require are significant enough to require re-qualification. Whilst understanding that parties self-assess the need to re-qualify, the scale and significance of the proposed and alternate solutions could see numerous parties submitting re-qualification applications at the same time. This would impact the implementation date as it would add a significant lead time to the implementation process for parties.</p>
Gazprom Marketing & Trading Retail Ltd	Yes	<p>At this stage we have not been able to review the proposed modification in as much depth as we would like. As a result we have provided a short response below, instead of answering all the specific consultation questions.</p> <p>We are not completely clear on the process for how a supplier/agents with a DCC-serviced smart meter will know that the new/gaining supplier will not operate the meter through the DCC.</p> <p>For example, as a non-domestic supplier we may decide not to utilise the DCC solution, however upon Change of Supply, we may churn in a meter that is a DCC-serviced smart meter.</p> <p>More specifically, in 3.2.6.1 of BSCP504 proposal: Would we be notifying what the metering system is with the old supplier or once we are the new supplier?</p>

Respondent	Response	Comments
		We think greater clarity is needed in these areas.
Siemens Operational Services	Yes	<p>We would be supportive of EDF Energy's proposal in their email dated 4/2/2105 which suggested the use of the D0170 flow with a new Requested Action Code value to inform the NHHDC /NHHMOA that the legacy CoS process is to be followed. This would reduce development costs as it would not involve any structural changes to the record layout of the D0170 dataflow, which would happen if the proposal using multiple D0155s was approved. Not only would there be a record layout change to the D0155 to cater for there would also be potential impact on BSC Performance reporting for those PARMS Serials using D0155 data flows because of the introduction of additional D0155s. All this would be avoided if the D0170 solution is adopted.</p> <p>As NHHDC and NHHMOA we are not directly affected by EDF Energy's suggestion of using the D0010 instead of the D0311 to transfer reading between Suppliers assuming that there will be no structural change to the record layout of the D0010 dataflow if it is used for this purpose.</p>
E.ON Energy Solutions	Yes	See below schematic setting out our alternative process utilising the Billing Data Log Snapshot
ScottishPower Energy Retail	Yes	<p>1. BSP514 indicates that the new MOP should only issue a D0149 and D0150 flow once the supplier confirms how the smart meter has been configured at CoS gain using a D0367 Smart Meter Configuration Details dataflow (or equivalent).</p> <p>We do not think this is the best solution, for the following reasons:</p> <p>The supplier needs the meter serial number in order to populate the D0367 flow. The MSN cannot be sourced from the DCC as the DCC does not hold the MSN – it holds the GUID instead. The MSN could be sourced from ECOES or the D0311 but we would consider the D0150 a more accurate source of this information.</p> <p>Moving the issue of a D0150 to after the SSD may require wider changes to our business processes e.g. regarding the collection and processing of an opening meter reading at CoS.</p> <p>We would prefer to stagger the issue of the D0149 and D0150, so that:</p>

Respondent	Response	Comments
		<ul style="list-style-type: none"> • the new supplier MOP continues to issue a D0149 and D0150 to the supplier in response to the agent appointment request (following the as is process); • the MOP does not issue a D0149 and D0150 to the NHHDC and DNO until a D0367 is received from the supplier, • upon receipt of the D0367, the MOP issues an updated D0149 and D0150 to the supplier, and also issues the (updated) D0149 and D0150 to the NHHDC and DNO. <p>This approach would assist the supplier in generating the D0367 and also minimise the level of change to our existing processes.</p> <p>Alternatively the Meter Serial Number could be made optional within the D0367 so that the dependency on the D0150 is removed, but that would require additional logic in the MOP system to match the meter configuration details to the correct meter.</p> <p>2. The redlined changes to BSCP504 and BSP514 do not define what constitutes a smart meter "serviced" via the DCC. We would expect this to be smart meters:</p> <ul style="list-style-type: none"> • Where the DCC service flag in MPAS is set to "Active" and • The device status in the DCC inventory is "Commissioned" i.e. the meter was not installed with the comms turned off as part of an "Install and Leave" scenario <p>Given the late changes by the proposer of the modification regarding the flows to be used in these processes, further consideration will be required over and above the response given above.</p>
EDF Energy plc; EDF Energy Nuclear Generation Ltd; EDF Energy Customers Plc; British Energy Direct Ltd; Seaboard Energy	No	We have no further comments on P302.

Respondent	Response	Comments
Limited; Jade Power Generation Ltd; West Burton Ltd; EDF Energy (West Burton Power) Ltd; British Energy Generation (UK) Ltd		
British Gas	No	We do not have any additional comments to those already made.
SSE	No	-

E.ON Alternative Proposal



***Billing Data Log Snapshot contains total cumulative and 48 register reads;
Can be accessed by both old a new suppliers negating need to send reads between them**

