

CP1475 'Remove obligation to re-date final NHH Meter readings on CoMC'



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About This Document

This document is the Final Change Proposal (CP) Report which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1475.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and approved implementation approach. It also summarises the SVG's views on the changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachment A contains the CP1475 proposal form.
- Attachment B contains the approved redlined changes to deliver the CP1475 solution.
- Attachment C contains the full responses received to the CP Consultation.

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1 Why Change?

Background

On a Change of Measurement Class (CoMC) from Non Half Hourly (NHH) to Half Hourly (HH), the newly appointed HH Meter Operator Agent (HHMOA) notes the final NHH meter register reading(s) at the point it remotely reconfigures (or replaces) the Meter. The HHMOA sends the final meter register reading(s) to the NHH Meter Operator Agent (NHHMOA). The NHHMOA re-dates the meter register reading(s) to midnight (start of day) on the Effective to Settlement Day of the NHHMOA appointment. The NHHMOA passes the re-dated meter register reading(s) to the NHH Data Collector (NHHDC) for validation and processing to Settlement, via a [D0010 'Meter Readings'](#) data flow.

This process of re-dating the final NHH reading(s) was introduced to work around a constraint in some NHHDC or NHHMOA systems, whereby the agent was unable to process final readings dated after the effective date of its de-appointment.

What is the issue?

As the reading taken on the effective date of the CoMC is re-dated to the previous day, the associated Annualised Advance (AA) is effective until two days before the effective date of the CoMC. This means that the final Settlement Day on which the Metering System is NHH is settled on an Estimated Annual Consumption (EAC) value. As the final AA already takes into account any residual energy consumed while the Metering System is NHH, the Supplier is overcharged for the final day. Whilst this is not an issue when NHH to HH CoMC occurs in low numbers, it becomes more significant over larger numbers of transfers.

Furthermore, using an EAC for the final day on which the Metering System is NHH has a small impact on Supplier performance against Performance Assurance Reporting and Monitoring System (PARMS) Serial SP08a 'Percentage of Non-Half Hourly (NHH) Energy Settled on Annual Advances'. This is in spite of the availability of a Meter Advance for the day in question.

The workaround can also cause additional data quality issues if the effective date of the Meter Technical Details needs to be re-dated in order to align with the final meter register reading(s).

Approved solution

The approved solution is to stop the NHHMOA re-dating the D0010 data flow and process the D0010 data flow with the date of the CoMC meter configuration.

To implement these changes, revisions are required to [BSC Procedure \(BSCP\) 514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#). The solution removes sections 7.1.19 and 7.2.18 from the CoMC processes.

Related Changes

There are no other changes which relate directly to this CP. However, there are a number of other industry changes that also seek to facilitate elective HH Settlement. The table below summarises the current stage of the existing BSC and Master Registration Agreement (MRA) changes which aim to facilitate elective HH Settlement. These changes were raised following recommendations from Ofgem and the Settlement Reform Advisory Group (SRAG).

Related changes		
Change	Change title	Summary
CP1469	Changes to support the implementation of the SRAG's recommendations.	The SVG approved CP1469 on 4 October 2016 (SVG188) for implementation on 29 June 2017.
DTC CP 3496	Changes to support the implementation of the SRAG recommendations.	Data Transfer Catalogue (DTC) CP 3496 is a related DTC change to facilitate CP1469. The MRA Development Board (MDB) approved DTC CP 3496 on 22 September 2016 for implementation on 29 June 2017.
CP1466	Removing SMETS compliant Meters from the scope of BSCP601.	The Panel approved CP1466 on 8 December 2016 (Panel 261) for implementation on 23 February 2017.
CP1474	Updating the CoMC processes to facilitate the elective HH Settlement of SMETS Meters.	The PAB (PAB191), SVG (SVG191) and ISG (ISG189) approved CP1474 on 15 December 2016, 3 January 2017 and 4 January 2017 respectively, for implementation on 29 June 2017.

Proposer's rationale

Removing the step of re-dating final meter register reads avoids Suppliers being double-charged on a CoMC for energy consumed on the last Settlement Day that a Metering System is NHH. It removes a workaround that was introduced when a majority of CoMC events were physical Meter exchanges and meter readings / D0010 Data Flows were not sent regularly between respective HH and NHH participants.

This change will improve Supplier Settlement accuracy by removing double charging. It will also remove a potential barrier to elective HH Settlement.

Approved redlining

Attachment B contains the approved changes to BSCP514 to deliver CP1475.

Housekeeping change

We have also included a Housekeeping Change to BSCP514. Currently section 6.2.1.9 incorrectly states that it follows 'Within 5 WD of 6.2.1.7'. The Housekeeping Change amends section 6.2.1.9 to state that it follows 'Within 5 WD of 6.2.1.8'. This ensures the sections follows the incremental order, and is consistent with footnote 50, which states 'The current NHHMOA will send the Meter Technical Details on receipt of a D0170'.

This error in referencing arose when the redlining for [CP1309 'Include reference to D0303 in BSCP514 and circumstances in which its use is mandatory'](#) was incorrectly implemented during the June 2010 BSC Systems Release.

3 Impacts and Costs

Central impacts and costs

CP1475 requires a change to BSCP514. No central system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1475 are approximately £240 (one ELEXON working day) to implement the document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP514	<i>None</i>

BSC Party & Party Agent impacts and costs

We believe this change will impact NHHMOAs and NHHDCs. The consultation also highlighted that Suppliers and HHMOAs will be impacted by this change.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	<ul style="list-style-type: none">The Supplier will need to remove any system constraints that prevent it accepting a D0010 after the NHHDC de-appointment date and processing the read for billing.
HHMOA	<ul style="list-style-type: none">The removal date will be within the HHMOA appointment window. Dependent on system logic, this may trigger HHMOA systems to issue a removal D0268 'Half Hourly Meter Technical Details'. The HHMOA will need to ensure that a removal D0268 is not issued on the CoMC.
NHHMOA	<ul style="list-style-type: none">The NHHMOA will need to pass final NHH readings (as received from the HHMOA on CoMC) to the NHHDC without re-dating them to the de-appointment date. The NHHMOA will need to remove any system constraints that prevent readings being processed for the day after its de-appointment date.The removal date will be within the HHMOA appointment window. Dependent on system logic, this may result in the NHHMOA not issuing a removal D0150 'Non Half-hourly Meter Technical Details'. The NHHMOA will need to ensure that a removal D0150 is issued on the CoMC.
NHHDC	<ul style="list-style-type: none">The NHHDC will need to remove any system constraints that prevent readings being processed for the day after its de-appointment date.

Six of the eight CP Consultation respondents indicated that CP1475 will impact their organisations. Two respondents noted process changes only. However, one of these

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respondents noted that as a Meter Operator Agent (MOA), these process changes would be minimal to remove the step of re-dating a final read.

Four respondents indicated they would need to implement system changes or potentially require system changes. One of these respondents noted that as a Supplier, they will be receiving a D0010 after the NHHDC de-appointment date. They noted that to process the D0010, it would require a system change to accept and process this read for billing following the asset change. Another respondent, which represented a NHHDC and a NHHMOA, noted that if the removal read is not re-dated, the NHHMOA and NHHDC will need to handle reads outside of their appointment dates. They also indicated they may have a problem around issuing the correct Meter Technical Details to the correct Parties. The respondent noted that currently, the NHHMOA issues a removal D0150 to the NHHDC dated to a minute to midnight on CoMC-1. However, if the removal date is within the HHMOA window, then their system would issue a removal and install D0268 for the new HHMOA appointment. This in turn could impact the previous Data Collector (NHH), Supplier and Distributor. The respondent noted that to meet the requirements of CP1475 would require significant system development and testing.

Six of the eight respondents identified costs associated with implementing CP1475. Three of the respondents noted the costs relate to system changes, with one noting changes so the Data Collector could handle the incoming D0010.

You can find the full responses received to the CP Consultation in Attachment C.

4 Implementation Approach

Approved Implementation Date

CP1475 is approved for implementation on 29 June 2017 as part of the June 2017 BSC Systems Release.

The Implementation Date aligns with other changes seeking to facilitate elective HH Settlement and improve the CoMC processes. This will avoid any participant costs caused by changing the same functional areas in different releases.

The Implementation Date also meets Ofgem's target date for removing barriers to elective HH Settlement by early 2017, as set out in the Ofgem ['Elective half-hourly Settlement: conclusions paper'](#).

Six of the eight respondents agreed with the proposed implementation approach. Two respondents disagreed with the Implementation Date. One of these respondents did not believe June 2017 is achievable. This is due to the amount of system development required. The other respondent that disagreed noting there are a number of significant IT changes due for delivery in June 2017. The respondent noted that the elective Half Hourly Settlement market would only be opening in June 2017. Therefore, they believed the perceived financial impact stated in the proposal (double-charging), as a result of CoMC activity, is highly unlikely to be of consequence.

SVG's initial views

The SVG considered CP1475 at its meeting on 1 November 2016 ([SVG189/06](#)).

The SVG agreed that the step of re-dating final NHH Meter readings on a CoMC is incorrect. An SVG Member noted that the step was historically in place because agent systems were unable to process readings dated after the effective date of their de-appointment.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1475 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1475 proposed solution?	5	3	0	0
Do you agree that the draft redlining delivers the intent of CP1475?	7	1	0	0
Will CP1475 impact your organisation?	6	2	0	0
Will your organisation incur any costs in implementing CP1475?	6	2	0	0
Do you agree with the proposed implementation approach for CP1475?	6	2	0	0
Do you have any further comments on CP1475?	2	6	n/a	n/a

Comments on the CP

Five of the eight respondents to the CP Consultation agreed with the CP1475 proposed solution. One of these respondents believed that re-dating of the final read is no longer required. The respondent noted that the re-dating is potentially detrimental to the move to HH Settlement, and amending the process removes the risk of double counting and receipt of exceptions. Another respondent noted the extra step in the process sits with the MOA, but the step was borne from a NHHDC constraint. The respondent noted that it is a practical requirement for the NHHDC to receive the final read at D+1 to their last appointment date, and they should be able to process this read.

Two of the respondents that disagreed with the CP1475 proposed solution noted its timing in relation to [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#). They noted that a large amount of the CoMC for P272 would have occurred before June 2017, so the level of CoMC after implementation will be low. One of these respondents noted that as CP1475 will be implemented post P272¹, the impact of the EAC value on performance and SP08a performance will be low. The respondent also believed that CP1475 will not help facilitate elective HH Settlement, with CP1474 considered. ELEXON has expanded on this point in the 'Subsequent ELEXON views' section below.

The third respondent that disagreed with the CP1475 proposed solution did not believe the issue identified needs to be addressed. Therefore, they did not see how the proposed solution provides benefits over the current arrangements. The respondent also did not believe this change is relevant to elective HH Settlement, and the issue identified is not a material cost barrier for elective HH Settlement.

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¹ The Implementation Date of P272 is 1 April 2017.

Subsequent ELEXON views

ELEXON notes that under the CP1474 solution, the HHMOA will no longer take the initial/final register reading(s) and pass them to the NHHMOA. Under CP1474, the readings will be taken by the Supplier. The Supplier will not be required to re-date the readings for the benefit of the NHHDC. This is because it is not appropriate to carry forward a legacy workaround into a new process.

ELEXON notes that if CP1474 is approved, the number of Metering Systems that will be impacted by CP1475 will be low. The Metering Systems impacted by the CP1475 solution will be any remaining CoMC activity for P272; and CoMC for elective HH advanced Meters outside of the scope of P272. However, if CP1474 is rejected, CP1475 will also impact elective HH SMETS Meters. Therefore, the merits of CP1475 should be considered in light of the CP1474 decision.

Comments on the proposed redlining

Seven of the eight respondents to the CP Consultation agreed that the draft redlining delivers the CP1475 proposed solution. One respondent disagreed, and noted that when a CoMC is not concurrent with a Change of Supplier (CoS), a new section is required in [BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#). The respondent's comments on the proposed redlining, along with ELEXON's response, are in the table below.

Comments on the CP1475 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP504	The present process for a CoS event a D0086 is produced for Notification of Change of Supplier Readings. If there is not a CoS event and only a CoMC no D0086 will be produced. A new section for when CoMC it is NOT concurrent with CoS will be required.	Agree that this is a defect in the current wording of BSCP504 3.3.1. However, no changes to BSCP504 are proposed (or necessary) to meet the objectives of CP1475. This could be resolved by a separate CP, although future use of the 'legacy CoMC' processes will be minimal once the P272 migration is complete and if CP1474 is approved.
BSCP504 – 3.3.1 Footnote 56	If the above is True, will this need amending or removing?	As above.

SVG's final views

The SVG considered CP1475 at its meeting on 3 January 2017 ([SVG191/04](#)).

ELEXON noted that CP1475 is proposing to remove the step of re-dating final NHH readings on a CoMC. However, ELEXON highlighted that this change is only applicable to the existing CoMC processes. ELEXON noted that the step of re-dating has not been included in the new CoMC processes for SMETS Meters proposed by CP1474. ELEXON noted that the merits of CP1475 should be considered in light of the decision on CP1474. If CP1474 is approved, then the pot of Metering Systems impacted by CP1475 would be reduced. This pot would include any CoMC activity outstanding from P272, and any Advanced Meters settled elective HH which fall outside the scope of P272.

An SVG Member noted that the existing process of re-dating is a workaround, which has been incorrect for 15 years.

ELEXON asked the SVG if they believed CP1475 has merit with CP1474 considered. Apart from one SVG Member, the SVG believed that CP1475 is justified taking into account the level of outstanding CoMC activity from P272. However, one SVG did not agree that CP1475 is a top priority, considering the other changes scheduled for implementation. The SVG Member was not convinced of the rationale for the change, and noted the implementation costs to parties for system changes.

Another SVG Member noted that anyone with an Advanced Meter outside of the scope of P272 (Profile Classes 3-4) could opt to settle elective HH. The SVG Member noted that when these Metering Systems are taken into account, the potential pot impacted by CP1475 increases.

The SVG Member that expressed concerns confirmed that they did not feel strongly enough to defer decision to the Panel.

An SVG member noted that following a CoMC to elective HH, it is not possible to clarify which Metering Systems are mandatory HH or elective HH if they are in Profile Class G. ELEXON noted that they are aware of this issue which may need addressing in the future.

Final decision

The SVG has:

- **APPROVED** the proposed changes to BSCP514 for CP1475; and
- **APPROVED** CP1475 for implementation on 29 June 2017 as part of the June 2017 BSC Systems Release.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
AA	Annualised Advance
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	BSC Procedure (<i>Code Subsidiary Document</i>)
CoMC	Change of Measurement Class
CoS	Change of Supplier
CP	Change Proposal
CPC	Change Proposal Circular
DTC	Data Transfer Catalogue (<i>Industry Code Subsidiary Document</i>)
EAC	Estimated Annual Consumption
HH	Half Hourly
HHMOA	Half Hourly Meter Operator Agent (<i>Supplier Agent role</i>)
ISG	Imbalance Settlement Group (<i>Industry Panel sub-committee</i>)
MDB	Master Registration Agreement Development Board (<i>Industry Panel</i>)
MOA	Meter Operator Agent (<i>Supplier Agent role</i>)
MRA	Master Registration Agreement (<i>Industry Code</i>)
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector (<i>Supplier Agent role</i>)
NHHMOA	Non Half Hourly Meter Operator Agent (<i>Supplier Agent role</i>)
PARMS	Performance Assurance Reporting and Monitoring System
SMETS	Smart Metering Equipment Technical Specifications (<i>Industry document</i>)
SRAG	Settlement Reform Advisory Group (<i>Industry expert group</i>)
SVG	Supplier Volume Allocation Group (<i>Industry Panel sub-committee</i>)
WD	Working Day

DTC data flows

DTC data flows and data items referenced in this document are listed in the table below.

DTC data flows	
Number	Name
D0010	Meter Readings
D0086	Notification of Change of Supplier Readings
D0150	Non Half-hourly Meter Technical Details

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DTC data flows	
Number	Name
D0170	Request for Metering System Related Details
D0268	Half Hourly Meter Technical Details
D0303	Notification of Meter Operator, Supplier and Metering Assets installed / removed by the MOP to the MAP

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	D0010 page on the MRA website	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0010&FlowVers=2&searchMockFlows=False
3, 10	BSCP page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
3	CP1469 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1469/
3	SVG188 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-188/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-188/
3	DTC CP 3496 page on the MRA website	https://mra.mrasco.com/change/changes-to-support-the-implementation-of-the-srag-recommendations/
3	CP1466 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1466/
3	Panel 261 page on the ELEXON website	https://www.elexon.co.uk/meeting/bsc-panel-259/?from_url=https://www.elexon.co.uk/events-calendar-item/bsc-panel-259/
3	CP1474 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1474/
3, 11	PAB191 page on the ELEXON website	https://www.elexon.co.uk/meeting/pab-191/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-191/
3	SVG191 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-191-2/
3	ISG189 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-meeting-189/?from_url=https://www.elexon.co.uk/events-calendar-item/isg-meeting-189/

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External Links		
Page(s)	Description	URL
4	CP1309 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1309-include-reference-to-d0303-in-bscp514-and-circumstances-in-which-its-use-is-mandatory/
5	D0268 page on the MRA website	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0268&FlowVers=1&searchMockFlows=False
5	D0150 page on the MRA website	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0150&FlowVers=1&searchMockFlows=False
7	Elective HH Settlement conclusion paper on the Ofgem website	https://www.ofgem.gov.uk/publications-and-updates/elective-half-hourly-settlement-conclusions-paper
8	SVG189 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-189/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-189/
9	P272 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/