

Second CP Consultation

CP1515 'Meter Operator Agents to send Metering System Data to SMRS instead of ECOES for the Faster Switching Programme'

ELEXON



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About This Document

This is the second Change Proposal (CP)1515 consultation. We have issued CP1515 for a second consultation as amendments of a material nature were required to the solution following responses to the first CP consultation.

CP1515 was raised on 4 January 2019 by ELEXON, on behalf of the Faster Energy Switching Group (FSEG), to meet Ofgem's Faster Switching Programme Stage 0 timeline, with the first consultation period active between 7 January 2019 and 1 February 2019.

The purpose of this second CP1515 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of the revised solution to CP1515. The Supplier Volume Allocation Group (SVG) will then consider the responses to both consultations before making a decision on whether or not to approve CP1515.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes, responses from the first industry consultation and subsequent amendments made to the solution.

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- Attachments A-B contain the proposed redlined changes to deliver the CP1515 solution.
- Attachment C contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.
- Attachment D contains the consolidated responses to the first CP1515 consultation.
- Attachment E contains the CP1515 Proposal Form.

1 Why Change?

What is the issue?

Data currently sent to the Electricity Central Online Enquiry Service ([ECOES](#)) platform by Meter Operator Agents (MOAs) is required to be sent directly to the Supplier Metering Registration Services (SMRS) for Ofgem's [Faster Switching Programme](#).

Balancing and Settlement Code Procedure ([BSCP](#))514 'SVA Operations for Metering Systems Registered in SMRS,' currently requires MOAs to notify ECOES of the following items upon installation of, or following any subsequent changes to, Metering Systems:

- Metering System ID;
- Meter Serial Number;
- Meter Type;
- Date of Meter Installation;
- Date of Meter Removal; and
- Meter Asset Provider ID.

This procedure is completed by sending a 'Notification of Meter Information to ECOES' ([D0312](#)) data flow. Stage 0 of Ofgem's Faster Switching Programme requires that the SMRA be the main repository of all Supplier and Supplier Agent registration data, in readiness for the SMRA to provide this data to the Central Switching Service (CSS), for Stage 1 of the Faster Switching Programme, which is scheduled to go-live in 2021.

As a result, MOAs will be required to send the Metering information described above directly to the SMRA rather than ECOES using the D0312 or, where the Meter Asset Provider has changed, a 'Notification of Meter Asset Provider' ([D0304](#)) data flow.

Background

Ofgem's Faster Switching Programme

The current switching arrangements, developed in the late 1990s, are complex for

Suppliers, which can lead to delays, errors and costs, which are often borne by consumers. Ofgem is taking steps to transform the current switching arrangements, and deliver faster, more reliable switching for consumers.

The delivery of the new switching arrangements will occur over multiple transitional stages. Each stage will require the development of new products and processes to support existing services within the GB energy retail market. Within each transition stage, data migration activities will be required between services to enable the operation of the new arrangements. The migration of data must be aligned to the development and implementation of new services in terms of functionality and interfaces.

Faster Switching Programme Stage 0 (pre-transition)

To support the delivery of the new faster Switching Arrangements an [End-to-End \(E2E\)](#) design has been produced by the Ofgem Switching Design Team. This is for Ofgem's Faster Switching Programme Stage 0, which is scheduled for implementation in June 2019.



Electricity Central Online Enquiry Service (ECOES)

ECOES is a market information system supporting the electricity customer transfer process in Great Britain. It mirrors information held in the SMRS.



Supplier Meter Registration Agent (SMRA)

SMRA means a Licensed Distribution System Operator acting in its capacity as the provider of a Supplier Meter Registration Service.



Supplier Meter Registration Service (SMRS)

Means the service provided to or to be provided by a Licensed Distribution System Operator for the registration of Metering Systems at Boundary point on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

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The stage requires that the CSS receive Meter information directly from SMRS. Since Meter information is not currently sent from MOAs to SMRA, the implementation of CSS requires that the Supplier Meter Registration Agent (SMRA) becomes responsible for being the central repository for Meter information, to enable data migration and enduring data feeds to CSS.

Ofgem published an [open letter on 11 September 2018](#) encouraging Suppliers, Licensed Distribution System Operators (LDSOs), and other stakeholder's to support the FSEG. The purpose of the letter was to encourage stakeholders to ensure appropriate resource availability for the design, build, test phase of the Faster Switching Programme, such that they work with their agents such as MOAs to ensure the publication of accurate industry data on a timely basis.

DTC CP3554 'Update of Meter Details to MPAS'

On 7 November 2018, the Master Registration Agreement Service Company (MRASCo) Development Board (MDB) approved v2.0 of Data Transfer Catalogue ([DTC CP3554](#) 'Update of Meter Details to MPAS' for implementation on 27 June 2019. CP3554 will provide the Meter Point Administration Service (MPAS) (SMRA in BSC terms) with Meter information from MOAs. This will be achieved through amending the data items currently sent via the D0312 data flow, as set out in BSCP514 section 2.1.4.

DTC CP3554 will additionally reroute the D0312 so that it goes to SMRA, in place of the ECOES. The SMRA will then forward all Meter Information that has passed validation to ECOES for publication.

Consequently, MOAs will be required to send Metering System data to the SMRA, who will validate the data before sending it to ECOES.

DTC CP3554 will introduce revised versions of the D0312 and D0304, as outlined below:

D0312 changes

- change the title of the D0312 DTC data flow from "Notification of Meter Information to ECOES" to "Notification of Meter Information to Meter Point Administration Service (MPAS) [SMRA]" and update the flow description;
- change the recipient of the D0312 to SMRA instead of ECOES, and introduce a 'response' D0312 flow from SMRA to MOAs and Suppliers following validation;
- introduce a new data item 'MOP¹ [MOA in BSC terms] Flow Response Code²' to allow SMRA to reject the D0312;
- add data item J0178 'Meter Operator ID' to the D0312 to allow the MOA to be identified; and
- amend the structure of the D0312 to incorporate the two additional data item to the D0312 and the rejection process.



Meter Point Administration Service (MPAS)

MPAS is the MRA's equivalent of BSC's SMRS.



Meter Operator Provider

A Meter Operator Provider (MOP) is the MRA's equivalent to the BSC's Meter Operator Agent (MOA).

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² Please refer to [DTC CP3554 v2.0](#) for details of the response values.

D0304 changes

- introduce a revised version of the D0304 “Notification of Meter Asset Provider” DTC data flow including a new data item ‘MPAS [SMRA] D304 Response Code’ to allow SMRA to reject the flow; and
- introduce new instances of the D0304 from Meter Operator to MPAS and from MPAS to Meter Operator following validation.

DTC CP3554 and BSC CP1515

MOAs are not signatories to the MRA and therefore have no obligation to comply with the DTC change. Therefore, it is necessary that CP1515 be implemented to place the obligations on MOAs to comply with CP3554. Therefore, this CP1515 is an enabler to Ofgem’s Faster Switching Programme.

Proposed solution

Changes following the first CP1515 consultation

Following the first CP1515 consultation, ELEXON has made two changes, to address comments received from the first consultation. As these changes constitute material amendment, CP1515 has been re-issued for a second industry consultation period.

Despite these amendments, the intent of the CP1515 solution remains unaffected.

- The first amendment is a revised response time for Meter Operators to send corrected details to SMRS following a rejection of D0312 or a D0304 flow. This was originally proposed as a two Working Day (WD) period. Following consultation responses, and after discussion with all bar one respondent, this been amended to “Where the MOA can resolve the issue without needing to consult other parties, and to use reasonable endeavours where they do need to consult with other parties”.
- The second amendment clarifies the processes added steps relating to the D0304 rejections.

CP1515 proposed solution

The proposed solution for CP1515 seeks to amend [BSCP501 'Supplier Meter Registration Service'](#) and [BSCP514 'SVA Meter Operations for Metering Systems registered in SMRS'](#) to place obligations on MOAs to send the D0312 and D0304 DTC data flows to the SMRA instead of ECOES. It also mandates the SMRA to receive these flows, validate them and send response versions of the flows containing the appropriate response. The solution also mandates that MOAs have the ability to receive response flows from the SMRA, and subsequently action any D0304 or D0312 flows that contain a rejection code.

CP1515 proposes to amend BSCP514 to:

- Remove the requirement on MOAs to send D0304 and D0312 data flows to ECOES;
- Add a new requirement on MOAs to send D0304 and D0312 data flows to the SMRA;
- Add a new requirement on SMRA to validate D0304 and D0312 data flows received and to send D0304 and D0312 dataflow with the Response Code populated to MOAs;
- Add a new requirement on MOAs to action any D0304 or D0312 data flows received from the SMRA containing a rejection code.

CP1515 proposes to amend Amend BSCP501 to:

- Reflect that MOAs are required to send D0312 and D0304 data flows to the SMRA and receive responses from the SMRA using the same data flows.

CP Consultation Question

Do you agree with the CP1515 updated solution following the first CP consultation?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

Proposer's rationale

This change is required to mandate the revised usage of the D0312 and D0304, as amended by approved DTC CP3554, from June 2019 for Stage 0 of the Faster Switching Programme, as required by Ofgem as the Authority.

Proposed redlining

Attachments A-B contain the proposed redlining to the BSCPs required to implement the CP1515 solution. Market participant responses to the first CP1515 consultation were split regarding the draft redlining. Five respondents agreed with the redlining, whilst five had concerns that CP1515 did not fully deliver the proposed solution. For more details on the Industry's views on the redlining and ELEXONs response please see Section six of this paper.

Since the first CP1515 consultation, ELEXON made two changes to the redlining, as described above, which rectify the concerns highlighted with the proposed redlining as part of the first CP1515 consultation. We are seeking your views on the amended CP1515 proposed redlining as part of this second CP1515 consultation.

CP Consultation Question

Do you agree that the updated draft v0.2 redlining as part of this second CP1515 consultation delivers the CP1515 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment C

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1515 requires changes to two Code Subsidiary Documents (CSDs).

As part of this second CP1515 consultation, we can confirm that BSC Central Systems will not be impacted by the solution to this change.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP501BSCP514	<ul style="list-style-type: none">No impacts

Central costs

The Central implementation costs for CP1515 will be approximately £360 to implement the necessary document changes.

BSC Party & Party Agent impacts and costs

Eight out of the ten respondents to the first CP1515 consultation highlighted costs to develop and implement the CP1515 solution. One respondent noted they would incur enduring costs from additional data flow Data Transfer Network (DTN) charges.

The majority of respondents, all but one, highlighted they would incur system changes as a result of CP1515. One respondent expressed concern that the impacts on Suppliers had not been recognised. The respondent noted that the current drafting acknowledges Suppliers will receive the new version of the D0312 data flow, but the redlining does not provide clarity on what action a Supplier is expected to take. ELEXON discussed the concern with the respondent and clarified that MRASCo would be progressing revisions to a MRASCo Agreed Procedure and developing a new guidance document to provide clarity around Supplier processes relating to DTC CP3554 and CP1515.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier Meter Registration Agent	To receive and validate the D0304 and D0312 data flows received from MOAs and to send response data flows.
Suppliers	To receive response D0312 data flows from SMRA.
Meter Operator Agents	To send the D0304 and D0312 data flows to the SMRA and to receive response data flows from the SMRA – and to action any rejections.

CP Consultation Questions

Will CP1515 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1515 and the CP1515 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1515?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment C

4 Implementation Approach

Proposed Implementation Date

The proposed Implementation Date for CP1515 is 27 June 2019 as part of the June 2019 BSC Release, to align with DTC CP3554 which will also be implemented on 27 June 2019.

The June 2019 release aligns with Ofgem's faster switching programme Stage 0 timeline and is therefore the most appropriate Release to include this CP. If CP1515 cannot be implemented in June 2019, due to market participant impacts, it would be necessary to change the implementation date for DTC CP3554.

Four of the ten respondents to the first CP1515 consultation did not agree with the proposed Implementation Date, commenting that there needed to be more analysis, and further discussion to develop the solution. This further discussion took place through a call including ELEXON representatives, Gemserv and consultation respondents.

ELEXON has contacted the four respondents to discuss their concerns. It was accepted by ELEXON and respondents that the Implementation Date for this change is timed to align with Ofgem's Faster Switching Programme.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1515?

Please provide your rationale.

We invite you to give your views using the response form in Attachment C

SVG's initial views

CP1515 was presented to the SVG as a verbal update at its meeting on 8 January 2019. The SVG did not comment on CP1515, and noted that CP1515 had been raised and noted the proposed progression timetable.

Post meeting note: Please note that the proposed progression timetable has changed, due to CP1515 being issued for a second industry consultation, with the amended timetable outlined in section 7 of this paper.

6 Industry Views on CP1515 – first consultation

CP1515 was first issued for consultation on 7 January 2019, with a response deadline of 1 February 2019.

This section summarises the responses received to the first CP1515 consultation (CP1515 v1.0). You can find the full responses in Attachment D.

Summary of CP1515 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1515 proposed solution?	5	5	0	0
Do you agree that the draft redlining delivers the intent of CP1515?	5	5	0	0
Will CP1515 impact your organisation?	9	1	0	0
Will your organisation incur any costs in implementing CP1515?	8	1	0	1
Do you agree with the proposed implementation approach for CP1515?	6	4	0	0
Do you have any further comments on CP1515?	6	4	0	0

Material amendments to CP1515

The responses received to the first CP1515 consultation highlighted changes required to the BSCP redlining. These changes amounted to being classed as material, as the proposed D0304 changes were incomplete.

Due to the solution being materially changed, under BSCP40 'Change Management' governance, CP1515 has been issued for a second 10 WD consultation.

Engagement with market participants

As there were significant comments regarding the redlining, ELEXON and Gemserv held a joint teleconference call on 22 February 2019 to address concerns and achieve a consensus on how to resolve all issues. All those who responded to the CP1515 consultation were invited to join the call, and all bar one respondent participated. The main themes discussed included the key areas market participants highlighted as concerns as part of the first CP1515 consultation:

- The initially proposed two Working Days resolution timescale;
- General inconsistencies and clarification within the CP1515 solution;
- D0304 rejection code; and
- CP1515 Implementation timescales, given market participant impacts outlined as part of the first CP1515 consultation.

Market participants on the call unanimously agreed that the updated CP1515 redlining would address concerns raised as part of the first CP1515 consultation, and agreed that they would be able to implement CP1515 if approved by the Supplier Volume Allocation Group (SVG) at its meeting on 2 April 2019, in time for the June 2019 BSC Release. One respondent highlighted that whilst all those on the call approved of the new changes, when presented to their wider business, there may be further comments to feedback, which could then be provided as part of this second CP1515 consultation.

Implementation Date

Six out of ten respondents agreed with the proposed Implementation Date as part of the first CP1515 consultation. One respondent commented that significant improvements and clarifications were required to the changes proposed and draft redlining, which will likely require some additional time to complete ahead of CP approval. Four respondents believed further analysis was needed and clarifications on the solution and the redlining are required. Following discussions on the teleconference call, all participants agreed that they could deliver for the Implementation Date, if approved at the 2 April SVG.

We acknowledge that the need to re-consult due to material change will impact the timescales available for market participants to implement CP1515 between SVG approval and the Implementation Date. As noted in our further engagement with market participants, market participants that responded to the first CP1515 consultation agreed that 27 June 2019 as part of the June 2019 BSC release remained appropriate, though they highlighted the shortened implementation timescales were not ideal. One respondent explicitly highlighted it would be preferable to have more time to implement, but recognised that it is important to align and support Ofgem's Faster Switching Programme (and not to delay it) and to align with DTC CP3554.

DTN interactions

One respondent was concerned that the proposed solution in CP1515 includes the requirement that 'accepted' D0312 response flows are sent to the Supplier as well as to the MOA. The respondent was concerned there would be no value to the Suppliers from receiving the 'accepted' flows, and there would need to be additional system changes required to filter out these flows. Furthermore, they noted there are applicable charges for flows sent over the DTN. Therefore, the respondents view is that the additional 'accepted' flows are not cost effective or efficient in their usage. They would also require system and business process solution in relatively short timescales to achieve June 2019 implementation.

Whilst we appreciate the respondents view, we note that the respondents view is out of scope for CP1515, as it is a DTC requirement introduced by DTC CP3554.

Consultation respondents comments on the redlining

Two Working Days Resolution Timescale

Three respondents questioned the proposed two WD resolution timescale if a D0312/D0304 flow is rejected. Respondents shared concerns that this would not be a sufficient timescale to respond to the rejection; meaning MOAs would be non-compliant under the BSC. One respondent noted that from the list of 20 D0312 response codes, most

of the codes will never occur, or very rarely occur as their system has validation to prevent structural errors, for example: P Rejected - Meter ID is too long. As a result, the respondent identified the majority of rejections to be assigned to a small subset of codes, they predict the four most frequent rejection codes will be:

- C Rejected - The MPAN is disconnected on date of meter work.
- I Rejected - Sending MOP is not the appointed MOP on date of meter work or the current MOP
- J Rejected - No MOP appointed to MPAN on date of meter work.
- M Rejected - The Effective from Settlement Date {MSMTD} is prior to the previous Settlement Date {MSMTD} for this MPAN

The respondent commented that the proposed wording in BSCP514 suggests that the second D0312 a MOA sends will be different to the first, and therefore resolve the issue. However, the respondent clarified that in some cases the second D0312 will look the same as the first.

ELEXONs response and industry call

ELEXON contacted the respondents who raised concerns with the two WD resolution timescale. ELEXON proposed that the resolution timescale is extended to ten WDs. However, not all respondents agreed that a definitive timescale was appropriate, as the MOA could not necessarily resolve all rejections within a matter of Working Days. As a result, ELEXON proposed to amend the redlining to say “as soon as reasonably practicable”. However, this was rejected at the industry teleconference (see below). ELEXON has added this as an additional question in the CP consultation.

This resolution time issue was discussed during the industry call. Attendees determined the following wording be clearer than “as soon as reasonably practicable” and therefore more appropriate for CP1515:

“Where the rejection is of a type the HHMOA can resolve, a revised D0312 shall be sent within 5 WDs. But, if it is necessary to involve other industry parties to resolve the issue, then the HHMOA shall use reasonable endeavours to get a revised D0312 sent as soon as possible”

The redlining has now been updated with this amendment.

D0304 Rejection Code

One respondent highlighted that whilst provisions had been made in BSCP514 regarding an MOA resending a D0312, no provision had been made in BSCP514 for the acceptance/rejection of a D0304, and if rejected, there is no obligation on the MOA to resend a D0304.

ELEXONs response and industry call

ELEXON has updated the redlining, noting the amendment constitutes a material change. This second CP1515 consultation seeks industry views on whether the new steps relating to D0304 rejections deliver the intention of CP1515. Respondents on the industry call unanimously agreed with the updates.

General

The majority of respondents to the CP1515 consultation highlighted inconsistencies between BSCP501 and BSCP514. Respondents also requested that greater clarity was needed in the proposed redlining.

ELEXONs response and industry call

In response to the feedback we received through the CP1515 consultation, we have amended the redlining for BSCP514 and BSCP501. The amendments have addressed inconsistencies referred to in the first consultation, as well as clarification issues.

The table below summarises the specific comments from market participants on the CP1515 redlining, as well as ELEXONs response.

Issue	ELEXONs response
In BSCP501 where 3.2. a and b has been split, it is very clear, BSCP514 2.1.4 should be amended to replicate the layout of BSCP501	BSCP514 2.1.4 has been amended
Formatting of the redlining should be changed to provide clarity.	The redlining has been amended, through highlighting wording to indicate what has changed
BSCP514 section 2.1.4 e, 'and the supplier' should be removed.	The redlining has been amended

CP Consultation Questions

Do you agree with the revised response time following rejection of a D0312 or a D0304 flow?

Do you have any further comments on the updated CP1515 being consulted on as part of this second consultation?

We invite you to give your views using the response form in Attachment C

7 Next steps and progression timetable

Next steps

This CP1515 consultation (the second CP1515 consultation) was issued on **01 March 2019** for a 10 WD consultation period, with responses due **5pm 14 March 2019**.

CP1515 will be presented to the SVG at its meeting on 2 April 2019, where it will determine whether to approve CP1515.

Progression timetable

CP1515 verbal update to SVG	8 January 2019
CP1515 first industry consultation	8 January – 1 February 2019
CP1515 verbal update to SVG	5 February 2019
CP1515 second industry Consultation	01 March 2019 - 14 March 2019
CP1515 presented to SVG for decision	2 April 2019
CP1515 proposed Implementation Date	27 June 2019

8 Annex 1 – Summary of redlining comments from the first CP1515 consultation

This table summarises the clarification and inconsistency issues that were highlighted in the first CP1515 consultation.

For clarification purposes ELEXON would like to highlight that in the original BSCP514 redlining that was issued to industry on 8 January, there were a number of references throughout the document to "If response is anything other than 'Accepted' amend details and resend D0312". These references have now been removed from the amended redlining, but will not show as being removed on the updated document. This is because these references were not in the original document, and ELEXON have redlined against the original document, not the BSCP514 that was issued to industry to consult. Similarly, in BSCP514 section 2.1.4.1, in the BSCP514 document that was issued to industry the reference to "Meter Asset Provider" was taken out, however in the amended version it has been reinstated.

BSCP501

	Comment	ELEXONs Response
3.2A.1 3.2A.3 3.2A.5	The D0304 is only sent when the MAP Id changes and nothing else.	This has been amended to add clarity
3.2A.5	In 3.2A.5 there is no value to be gained by the MOA or Supplier in receiving D0312 or D0304 'accepted' flows from the SMRA. It seems an inefficient use of the flows to inform us that they are 'accepted', when the assumption can be made that if no flow is received they have been accepted and we will be notified by 'rejected' flows when there is an issue with the flows.	This text cannot be removed, as the DTC changes require the SMRS to send a "Response" D0312 or D0304, which will either contain an "Acceptance" code or one of several "Rejection" Codes. 3.2A.5 has now been merged with 3.2A.4
3.2A.2	Section 3.2A.2 states that "On receipt of data" SMRA will perform validation checks and 3.2A.3 "upon unsuccessful validation" SMRA will send D0312 and D0304. However, Section 3.2A5 states that "within 1 WD of 3.2A4 (successful validation) SMRA will notify MOA and Supplier of acceptance of Meter Information. Therefore there is inconsistency in timings for these sections which essentially are the same step, just one is an acceptance and one is a rejection In addition, BSCP514 section 5.3.4.18 states for the same actions "immediately following". There needs to be consistency between the timings stated within the BSCP501 and these should be reflected in BSCP514.	3.2A.5 has been merged 3.2A.4 and the "Within 1WD of 3.2A.4 above" has been removed. Amended

	Comment	ELEXONs Response
2.1.4a	It should be made clear in the paragraph at the end of this step that where only the MPA Id has changed the D0304 should be sent in accordance with clause 2.1.4d. As an example the DTC states - The D0150 shall not be used to indicate a change of MAP only. The D0304 shall be used in this instance. The respondent suggests to use that text and just change D0150 to D0312.	Amended as requested
2.1.4a	Suggest text is reviewed as flow may not be required - A D0312 flow may be sent where none of the above items have been changed e.g. when Meter Technical Details are sent on change of Supplier. or change of Meter Operator Agent. MPAS have no use for this flow and given the current high level of CoS would result in them receiving data flows that they don't want and the sender & Supplier receiving flows they don't want/need.	ELEXON have removed processes where they relate to change of Supplier and/or change of agent
2.1.4b	It needs to be clear that the D0312 is sent to MOP and Supplier for both rejections and acceptances especially as 2.1.4c mentions acceptance.	Amended
2.1.4d	It needs to be made clear this is only when the MAP Id has changed and nothing else. After 2.1.4d – need the equivalent of 2.1.4b but for D0304.	Amended
5.2.1 15-7	Suggest review of these steps as they are making sending D0312 on CoA mandatory when MPAS and Suppliers have no use for it.	5.2.15-17 has been removed
5.2.4 16-18	Suggest review of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).	5.2.4 16-18 has been removed
5.2.7.10-12	Suggest review of these steps as MPAS and Suppliers have no use for it. (see 2nd 2.1.4a comment above).	5.2.7.10-12 has been removed.

5.3.4.8	The reference to D0304 is appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312.	The reference to D0304 has been removed.
5.3.4.17	The reference to D0304 appears incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312.	The reference to D0304 has been removed.
5.3.5.6 6.3.4.23 6.3.4.27 6.3.4.29 6.3.5.6 7.1.21 7.4.20	The reference to D0304 appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312	The reference to D0304 has been removed.
5.4.1.15	The reference to D0304 appears to be incorrect, this flow is only used when only the MAP has changed. If the MAP changes as the result of the meter changing this is dealt with using the D0312. The When should say "Immediately following 5.4.1.14"	The reference to D0304 has been removed.
6.2.1.11-13 6.2.4 15-17	Suggest review of all of these steps as MPAS and Suppliers have no use for it. Ofgem have a desire for MTD to be sent within 10 Wds but we assume this will be picked up by a future CP	References 6.2.1.11-13 and 6.2.4 15-17 have been removed.

Missing from redlining	<p>On page 3 of the consultation document it is mentioned that the DTC CP3554 will:</p> <ul style="list-style-type: none"> • introduce a revised version of the D0304 "Notification of Meter Asset Provider" DTC data flow including a Response Code; and • introduce new instances of the D0304 from Meter Operator to MPAS and from MPAS to Meter Operator following validation. <p>However, in the BSCP514 redlining there is no mention of sending D0304 'from MPAS to Meter Operator following validation' and therefore it is also not clear why this is required.</p> <ul style="list-style-type: none"> • introduce new instances of the D0304 from Meter Operator to MPAS and from MPAS to Meter Operator following validation. <p>However, in the BSCP514 redlining there is no mention of sending D0304 'from MPAS to Meter Operator following validation' and therefore it is also not clear why this is required.</p>	Amended
5.2.1.15 and 6.2.1.11	<p>Change of HHMOA (No Change of Metering System or Change of Supplier) (5.2.1.15) states in the redlining "Optional, but if followed then within 10 WD of 5.2.1.8 or 5.2.1.13 (as applicable)". However (Change of NHHMOA (No change of Metering System or Change of Supplier) (6.2.1.11) states "Optional, but if followed then within 10 WD of 6.2.1.10 "</p> <p>Why is the sending of the D0312 mandatory for HHMOA but optional for NHHMOA?</p>	Amended
6.3.5.6	<p>In this section the provision has been added: "If Meter Asset Provider has changed, send notification of the new Meter Asset Provider."</p> <p>It may be worth including this provision and D0304 requirement in all similar scenarios if it is a necessity.</p>	Amended
7.1.21	<p>Change of Measurement Class from NHH to HH for HHDC-serviced Metering System (7.1.21) states the D0304 and D0312 flows should be sent by the NHHMOA, but this is a change to HH Measurement Class so wouldn't the assumption be for the flows to be sent from HHMOA?</p>	Amended

7.2.20	Similarly to the point made above (referencing 7.1.21), for Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems would the D0312 flow be sent from the HHMOA rather than the NHHMOA? The D0304 is not included in this scenario.	Amended
As listed	<p>There are a number of instances where the D0304 is omitted where it would appear to be required. Some of these instances may have a genuine reason for the D0304 not being needed, however it is unclear from the draft redlining. Please can it be confirmed whether omission of the D0304 in the following instances is intended, or where required correct the redlining to include the D0304:</p> <ul style="list-style-type: none"> • New Connection – Installation (5.2.2.13) • Half Hourly Metering System Investigation Process – D0304 is included in 5.4.1.15 (for HHDC-serviced Metering Systems) but not in 5.4.1.19 (for Supplier -serviced Metering Systems). • New Connection (6.2.2.15) • Reconfigure or Replace Metering System (No Change of Measurement Class) – D0304 included in 6.3.4.23 (for smart meters) but not in 6.3.4.6 (NHH non-smart meters) • Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems (7.2.20) • Change of Measurement Class from HH to NHH for HHDC-serviced Metering Systems (7.3.20) • Coincident Change of Measurement Class from NHH to HH and Change of Supplier for Supplier-serviced Metering Systems. (7.6.12) • Change of Measurement Class from HH to NHH for Supplier-serviced HH Metering Systems. (7.7.4) • Coincident Change of Measurement Class from HH to NHH and Change of Supplier for Supplier-serviced Metering Systems. (7.8.12) 	Amended

7.4.20	With regards to sending notification of the new Meter Asset Provider from NHHMOA to SMRS via the D0304 – it is not clear why this is required in addition to the D0312 (because the D0312 will already update the SMRS of this information, it seems therefore to be duplicate information about the MAP included in the subsequent D0304).	Amended
5.3.4 5.3.5.7 and 5.3.5.8 5.4.1.16 and 5.4.1.17 6.3.4.24 and 6.3.4.25 6.3.4.28 and 6.3.4.29 6.3.5.9 and 6.3.5 7.1.22 and 7.1.23 7.4.21 and 7.4.22	<p>BSCP514 Sections 5.3.4 State that the MOA sends a D0312 and if MAP change, a D0304 but in Section 5.3.4.18 the SMRS sends a D0312 response only. And if rejected, in Section 5.3.4.19, the MOA only resends a D0312. Therefore no provision has been made in BSCP514 for the acceptance/rejection of a D0304 and if rejected, no provision for MOA to resend a D0304.</p> <p>This also affects the following sections</p> <p>5.3.5.7 and 5.3.5.8</p> <p>5.4.1.16 and 5.4.1.17</p> <p>6.3.4.24 and 6.3.4.25</p> <p>6.3.4.28 and 6.3.4.29</p> <p>6.3.5.9 and 6.3.5</p> <p>7.1.22 and 7.1.23</p> <p>7.4.21 and 7.4.22</p>	This Issue has been addressed in version 2 of the redlining.
	There is no provision in the BSCP514 where the SMRS has sent a rejected D0312 to the MOA (or a D0304 – process step currently missing), and the MOA is not able to provide corrected data to resend the flows as the data they have sent is the only data they have got. What is the MOA expected to do in that scenario?	This will be a “best endeavours” rather than 5 WD
6.3.4.22	Section 6.3.4.22 references to section believed incorrect, i.e. was 6.3.4.15 now redlined to 6.3.4.14 and ditto Section 6.3.4.23.	Amended.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
SMRS	Supplier Meter Registration Service
ECOES	Electricity Central Online Enquiry Service
BSC	Balancing and Settlement Code
SVG	Supplier Volume Allocation Group
FSEG	Faster Switching Expert Group
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
MOA	Meter Operator Agent
MPAS	Meter Point Administration Service
MOP	Meter Operator
MRASCo	Master Registration Agreement Service Company
MDB	Master Registration Agreement Service Company Development Board
SVA	Supplier Volume Allocation
CSS	Central Switching Service
BSCP	Balancing and Settlement Code Procedure
CSDs	Code Subsidiary Documents

DTC data flows and data items

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

DTC Data Flows and Data Items	
Number	Name
D0304	Notification of Meter Asset Provider
D0312	Notification of Meter Information to ECOES
New Data Item	MOP Flow Response Code
New Data Item	MPAS D0304 Response Code

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.

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External Links		
Page(s)	Description	URL
	DTC CP 3554 – Update of Meter Details to MPAS	https://www.mrasco.com/changes/change-tracker/update-of-meter-details-to-mpas/
	Ofgem Faster Switching Programme	https://www.ofgem.gov.uk/publications-and-updates/stage-0-data-products
	Ofgem E2E Data Migration Plan	https://www.ofgem.gov.uk/system/files/docs/2018/06/d-4.3.6_e2e_data_migration_plan_v1.0_0.pdf