

ISSUE 86 MEETING NOTES

Significant Code Review (SCR) requirements

ELEXON briefed the Issue Group about the Switching SCR and the Retail Code Consolidations (RCC) SCR.

The RCC SCR will split out domestic and SVA non-domestic Metering between the BSC, REC and DCUSA and may even give some responsibility to MOCOPA (the Meter Operation Code of Practice Agreement). CVA non-domestic Metering arrangements are expected to remain in the BSC. Proposed redlining and draft legal text for both SCRs needs to be submitted to Ofgem by 31 March 2020.

There are some challenges associated with producing text by 31 March 2020, (not least the timescale):

- Providing the drafting for the split of Metering provisions; and
- How the associated Performance Assurance will be split between Codes. ELEXON is unlikely to meet the 31 March 2020 deadline in this respect and are in contact with Ofgem.

ELEXON invited the Issue Group to agree to extend the scope of Issue 86 to consider the redlining for the RCC SCR i.e. to ensure it is on the 'right path' similar to how the Issue Group looked at the Switching SCR redlining. The Issue Group agreed.

The Issue Group will meet in early March to review draft redlining/legal text; Issue Group Members were in general agreement with this.

Ofgem joined the meeting by telephone and expressed their appreciation to ELEXON for putting a plan in place to meet the SCR dates. By extension this includes the contribution of Issue 86 Group Members. They added they are looking at whether to bring in consultancy assistance to offer specialist advice and help resolve outstanding issue (e.g. assurance). Ofgem reiterated that ELEXON and Ofgem are working closely together and will continue to do so throughout the SCR processes.

A query was raised around Auditing and how it will work in practical terms if the RCC goes live on 1 April 2020 and there will then be a 2-5 month period before the CSS goes live.

ELEXON's understanding is that the Codes will undergo division on 1 April but, this is purely governance and won't have any practical implications. In other words, what industry does won't change but, who tells them to do it will change on 1 April 2020.

ACTION: ELEXON will share clarity around how MRA will be split etc. once it is known.

Switching redlining

ELEXON has completed most of the redlining based on guidance from previous meetings. Still to finalise some of the minor 'ancillary' changes (e.g. cross references in non-Switching BSCPs).

Still need to make changes to BSC legal text (anticipate around 13 sections of the BSC affected) some may be big, some small.

Some Members pointed out that the lay-out on MRASCo website works well and is worth considering.

Action: ELEXON to consider how changes will be shown on its website.

Quick win changes

The Issue Group discussed the quick wins that have been identified. The general feeling was that they should be raised sooner than later in the interest of customer service. However, this needs to be balanced against how they may impact the SCRs and as such, whether they should be raised now, after the SCRs complete, or whether to incorporate them into the SCR changes i.e. implement them as part of the Switching Programme changes.

There are three options for effecting a change:

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- Issue Group raise the change as Change Proposals;
- A BSC party could raise the changes; or
- Include in the Switching SCRs.

If the latter, we would need to highlight that it's a change from the source document when included in the SCR and not a Switching Programme consequential change. It would also be subject to Ofgem's SCR change process, which would determine whether to subsume or exempt the change from the SCR.

It was discussed that making changes now may be easier as people are familiar with identifying changes in existing Code documents but, it may not be easy to see if the appearance of the REC differentiates from source Codes. Similarly, if raised now, there would need to be three changes:

- A change to the BSC;
- A change to the DTC and/or MRA; and
- A change to SCR relining when directed in November 2020

If changes are pushed through now, the decision would likely not be made until May or June. If we aim for the November 2020 release (the first realistic option but also the last one before Ofgem direct Switching changes), there would only be 4 – 5 months implementation time.

This needs to be weighed against industry usually needing 6 months for system changes (which industry would likely need to make) when determining how best to make changes. However, under the Switching SCR industry could have up to 10 months (Nov 20 to August 21) to make changes associated with CSS. The other factor to consider is that implementing change this year would reduce the number of changes implemented next year relating to RCC and/or CSS matters.

It should also be considered that the quick wins could require changes to the DTC and/or the MRA (if raised before RCC is implemented) and as such, MRASCo's views should be sought before making recommendations. There was general support for progressing as much as possible before the SCRs.

Ofgem's stated view at the meeting was that, so long as there is no impact on switching, they would welcome changes being made sooner than later. However, they would consider each change on a case-by-case basis, and would expect a SCR Suitability Assessment Report to be submitted.

The quick wins identified were discussed briefly.

Change of Supplier (CoS) without Meter read

Where Meter reads are missing following CoS, chasers can't be raised until 30 Working Days (WD) after Standard Switch Day (SSD) i.e. SSD+30. This could/should be cut to SSD+15.

It was considered that this should be relatively easy to implement as it would just require a change to BSCP(s).

It was pointed out that missing reads and disputes is being considered under the MRA as a MAP.

An agreed procedure for missing CoS Meter reads is expected to go into the REC. If added to the SCRs, it will be consulted on as part of the Switching SCR. However, if done now, it would be a BSC change and a MRA change.

CoS no Meter

There are circumstances where MSIDs are created but a Meter does not exist at point of switching e.g. new-builds. This would look to firm up the process for these circumstances. (See meeting two documents for more detail)

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ELEXON is happy that the draft redlining submitted previously by an Issue Group member is sufficient to work with but, would need some critical friend analysis/refinement once the change is raised but, hadn't so far out of efficiency. It was stated that the redlining for NHH (not yet drafted) should be similar to that drafted for HH.

Switching Timescales

ELEXON has suggested how timings could be amended to make the process more efficient. (See meeting documents for more detail).

Names of Measurement Classes (on spreadsheet tabs) need to be transferable between Codes. However, it was noted that we need to make changes against the baseline i.e. the current BSC terminology.

The change to timescales should occur whenever an appointment occurs (i.e. CoA), not when the consumer switches (i.e. CoS).

One of the Members understanding was that once the REC/CSS has been implemented, unless the New Supplier appoints their own MOA [MEM], the old Supplier's MOA will remain as the MOA for that Metering System.

All timelines are based on ideal world scenarios and don't allow for delays. It was suggested that the BSCPs would need to acknowledge 'reasonable endeavours' or something similar.

It was pointed out that the separate tabs in the spreadsheet for HH could be confusing if not replicated for NHH. However, the spreadsheet was assembled for illustrative purposes to facilitate discussion/affirmation. If Issue Group Members wish to share with their colleagues, they (or anyone downloading from the Issue 86 webpage) are free to amend the spreadsheet as required for their colleagues understanding.

ACTION: ELEXON to put together an analysis grid ahead of the next Issue Group meeting. This will be used to give help/form recommendations as to when quick wins should be raised/implemented.

Action: ELEXON to arrange meeting with Ofgem and MRA for three way discussion on when quick wins should be implemented.

Standstill period

Ofgem wanted to gather views from Issue Group Members about whether there is a need to have a stand-still period as part of the switching process.

Do they need a stand-still to allow other activities to happen e.g. exchange of metering details etc? This would allow Suppliers to do 'Admin' e.g. verifications, preparing details to pass on, billing etc. At moment, it's 10WD.

Ofgem – trying to understand the technical constraints. Sounds like zero is not ideal.

It was suggested that the stand-still period shouldn't affect the gaining Suppliers, as CSS will request or reject the request, whether inside or outside of a stand-still period. But, it may affect customers if the switch is delayed and could affect Effective from Dates (EFDs) if discussing start dates with customers.

Under smart Metering, shouldn't need too much time, if any, for a stand-still period but, may need some time for legacy meters. However, exchanging technical details for smart meters could take longer.

One Member said they liked ten days as it would give them time to chase people and 'get ducks in a row'. As a result it was suggested to potentially start with ten days and monitor over a given period and see if it can be reduced once things have stabilised and matured.

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Need to consider Erroneous transfer (ET) and what will happen if customer reverts. For example if a customer switches from Supplier1 to Supplier2 and then back to supplier 1 during the cool-off period, there shouldn't be an issue. However, if they go to a third party, there could be an issue e.g. Supplier 1 to Supplier 2 and then switches to Supplier 3 before everything is passed to Supplier 2. In this case, supplier 2 won't have details to pass on to Supplier 3. This is an electricity only issue as Agents hold the information and need to pass it along (assuming CoA in event of CoS). In Gas all details are held centrally.

The concern is the Meter reading. Under the BSC there is a default process for Meter reads, so it's not too much of an issue and data will follow eventually. The problem would be that with multiple CoS in short order, estimated reads would be used in Settlement for longer than is necessarily needed.

There was a question about how likely there is to be a problem in terms of numbers and material impact. From a Settlement point of view, there's a big window to resolve any problems before the first Settlement Run. There may however, be billing impacts if, for example, it takes two months for details to catch-up for a 3 day window – why would customer pay? It is also worth noting that if concurrent Switches are within 5WD of each other, the Meter read from previous Supplier will be used in Settlement, so the 'meter read' could remain the same for a long time and then suddenly spike.

Action: Ofgem would appreciate Suppliers providing numbers and/or examples/scenarios of concern. Any Issue Group Members willing to help are to liaise via ELEXON to pass on details [post meeting note – ELEXON has shared details with two Members that volunteered in the meeting].

Elective HH Metering

The Issue group discussed how the switching process for Elective HH metering could be made more efficient with suggested amends to BSCPs (see slides for more detail)

Initial comments from those in the room:

- Reversion to NHH and treating it as a CoMC is for the benefit of Agents
- As these become smart Meters, and go through the smart CoMC process this issue will get better.
- This a training issue and there is a need to educate people properly
- Potentially, gaining Suppliers refusing to accept HH Meters is a barrier to switching
- Because the Meter isn't changing, it may not trigger need to change details
- Problem with existing process is that no open read is triggered to send data, or triggered to request date
- Question of whether this will still be an issue from summer 2021 onwards as a lot of Meters will be DCC enrolled by then
- Smart CoS only works if it's possible to communicate with a SMETS meter. If there's no communications, then Meters have to revert to being legacy – which isn't working.
 - It was questioned whether the issue is a lack of communications, or if the new Supplier isn't using them properly.
- The number of instances is reducing but, there will ultimately still be a pot left over for which a solution is required.
- It's only a problem for Suppliers offering the elective HH for their own business model where-as others don't want to offer the service (not helped by the issues with the CoMC process)

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It was suggested that a potential solution would be to create a new process for reversion to legacy. To do this there some form of indicator in a data flow would be needed to facilitate the reversion. Comments regarding this were:

- Potentially could add an action code to the D0170
- Nothing required going from NHH to HH but, something going the other way
- D0155 identifier isn't useful but, could use D0170 but, need a process to do that
- The D0155 flag would highlight problem to the agent. If not caught then, could be a lot further down the line before the issue is raised.
- D0311 – only populated if billed at least once. Lots of rules in the D0311 notes.
- New Supplier should use ECOES to know that it's an elective HH site. Information is available, it's a matter of whether the new Supplier and/or Agent choose to act up on it

Given the numbers involved, the limited scope (in terms of Suppliers affected), that more work is needed to determine the potential solution and it may be reduced with DCC enrolment – it was determined to park it for now.

Action: ELEXON to note that a change could potentially be raised to coincide with the roll-out of new REC.

Action: ELEXON should to consider the best way to provide guidance/direction.

P302 Smart CoS

ELEXON is aware anecdotally that there are some issues with the P302 process and sought the opportunity to explore the extent of issues encountered and what/when changes are required.

Some of the Suppliers present stated that they aim to use the P302 process but, a review may not necessarily be a bad idea.

Some of the issues relating to why P302 was raised e.g. re-configuration, are not necessarily seen now.

Issue Group Members suggested that there are bigger issues that may obscure the issues around using P302. Suppliers may try and use the process but if others aren't using it, then they bump up against problems.

There are some assumptions on how P302 should work but they're just not materialising. Mixture of people not using the process, having issues with the process and are too busy fighting issues elsewhere to raise concerns.

It was expressed that it may be difficult to agree the way ahead as there are issues around the DA/DC and Suppliers.

The DCC has set-up a focus group to look at CoS issues e.g. communications and configuration issues etc.

The text of when D0052s should be sent could be tightened up and there could be some refreshment of understanding.

Action: Quick win change to provide clarification regarding D0052s and P302 in BSCPs.

Action: ELEXON to consider raising a separate review/issue to look at P302 issues – raise before the end of 2020.