

## Proposed Solution

There are four potential solutions for consideration with solutions A through to C requiring changes to Appendix 4.8 of BSCP504 and potentially PSL120. Solution D does not require a change to the Code Subsidiary Documents.

It should be noted that NHHDC appointments are Calendar Day based.

The current business events included within BSCP504 are those outlined in 'Description of the Change'.

- A. **Irrespective of the business event, only the last two valid meter readings and the last Annualised Advance / Estimated Annualised Consumption will be transferred to the new NHHDC.**

Rationale:

This solution will result in the new NHHDC having in its possession the minimum historical data that it needs to be able to verify the meter readings collected and ensures a consistent approach irrespective of the business event trigger. This approach will also ensure that in the event of a bulk change of NHHDC being initiated, that the volume of historical data transferred will be minimised.

Potential Impacts:

- Appendix 4.8 of BSCP504 would be clarified so that the mandatory requirement of providing the above would apply, irrespective of the business event trigger.
- NHHDCs currently providing all historical data would be impacted.

Areas for Consideration:

Although this solution allows for more historical data than that currently provided on a change of NHHDC it does not provide as much historical data as required by the change of Supplier with concurrent change of NHHDC. Any issues arising on pre-transfer historical data cannot be resolved by the new NHHDC, as they do not have the historical data.

- B. **Irrespective of the business event, all historical meter readings and Annualised Advance / Estimated Annualised Consumption available to the old NHHDC will be transferred to the new NHHDC.**

Rationale:

This solution will result in more historical data being transferred than that currently required by BSCP504, however it ensures a consistent approach irrespective of the business event trigger. Although this ensures that the new NHHDC has the full set of historical data, it does mean that in the event of a bulk change of NHHDC that the volume of historical data to be transferred will be significant.

Potential Impacts:

- Appendix 4.8 of BSCP504 would be clarified so that the mandatory requirement of providing the above would apply, irrespective of the business event trigger.
- NHHDCs currently providing the minimum historical data would be impacted.

Areas for Consideration:

The benefit of having as full a history as possible is that the new NHHDC will be better able to validate meter readings (in particular, the review of suspect readings will be easier). This improves historical data quality and mitigates against the risk of erroneously large Annualised Advance / Estimated Annual Consumptions. Similarly, if erroneously large Annualised Advance / Estimated Annual Consumptions have already been calculated by the old NHHDC, it will not be possible to withdraw these unless they are passed to the new NHHDC. There is currently no obligation on the old NHHDC to take any corrective action.

- C. **Add a new additional business event relating to a bulk change of NHHDC, whereby only the last two valid meter readings and the last Annualised Advance / Estimated Annualised Consumption will be transferred to the new NHHDC. The existing business events will remain unchanged.**

Rationale:

This solution will be a bespoke solution specifically for the bulk change of NHHDC business event; thereby leaving the other two business events unaffected by this solution. This is the minimum historical data that the new NHHDC needs to be able to verify meter readings. This approach will also ensure that in the event of a bulk change of NHHDC being initiated, that the volume of historical data transferred will be minimised.

Potential Impacts:

- Appendix 4.8 of BSCP504 would be clarified so that the mandatory requirement of providing the above would apply, for the bulk change of NHHDC business event trigger.
- NHHDCs involved in the bulk NHHDC business event would be impacted.

Areas for Consideration:

Although this solution allows for more historical data than that currently provided on a change of NHHDC it does not provide as much historical data as required by the change of Supplier with concurrent change of NHHDC. Any issues arising (as outlined in solution B) on pre-transfer historical data cannot be resolved by the new NHHDC, as they do not have the historical data.

- D. **Leave the requirements as currently described in BSCP504.**

Not applying any change to BSCP504 will result in the flexibility remaining and does not address the issue where the sender and receiver are operating different working practices. In addition, this solution will mean that the rules will also vary for the different business events and will not specifically include the bulk change of NHHDC requirements.