



Change Proposal Circular – Collated Responses for CPC00721

CPC00721: Impact Assessment of CP1384

Responses for CP1384: Clarification on disconnection and associated processes

Summary of Responses for CP1384

Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
Association of Meter Operators	Meter Operators	No	-	00
British Gas	Supplier	Yes	No	00
EDF Energy	Supplier, MOP	Yes	Yes	60
Electricity North West Limited	Distributor	Yes	Yes	00
GDF SUEZ Marketing Ltd	Supplier	Yes	Yes	30
IMServ	HHDC, NHHDC, HHDA, NHHDA, HHMOP, NHHMOP	Yes	Yes	90
Northern Powergrid	LDSO, UMSO	Yes – with exceptions	Yes	180
npower	Supplier and Supplier Agents (NHH and HH)	Yes	Yes	180

**Any Questions**

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Summary of Responses for CP1384				
Organisation	Capacity in which Organisation operates in	Agree?	Impacted?	Days needed to implement
ScottishPower	Distributor, Supplier, Supplier Agents	No	Yes	00
SSE	Supplier & Party Agents	Yes	Yes	30
SSE Power Distribution	LDSO	Yes – in part	Yes	365
TMA Data Management Ltd	NHHDC, NHHDA, HHDC and HHDA	Yes	No	00
Western Power	LDSO	No	Yes	270

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Detailed Impact Assessment Responses CP1384			
Organisation	Agree?	Impacted?	Comments
Association of Meter Operators	No	-	<p>Agree change comment – No - Agree with the principles described, but the current drafting is not yet sufficiently clear, and requires further work.</p> <p>5.3.2.14 should include a requirement to remove and return the removed metering equipment to the MOA</p> <p>The removal of metering equipment is important to enable the Supplier (or customer) to avoid charges from their MAP, and to ensure that unused metering equipment is not allowed to be used to illegally extract electricity.</p> <p>5.3.3.4 This is very confusing. If the LDSO removes metering equipment then he should return it to the MOA. There are also some sections which would benefit from having numbered sections.</p> <p>6.3.2.9 and others. Would ideally replace any reference to Urgent Metering Service with 'in emergency'. The UMetS does not really exist. But LDSOs will attend when fires, flooding, identification of cannabis farms or other incidents have required the immediate de-energisation of a property. Clearly meter readings will not always be available, but the D0139 has the capability of reporting why readings are not available</p> <p>For which role is your organisation impacted? – No comment</p> <p>Please state what the impact is – No comment</p> <p>Lead time comment – 0 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No comment</p> <p>Associated costs comment – No comment</p>

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Organisation	Agree?	Impacted?	Comments
			Any other comments – No comments.
British Gas	Yes	Yes	Agree change comment – Yes For which role is your organisation impacted? – No comment Please state what the impact is – No comment Lead time comment – No comment Would implementation in the proposed Release have an adverse impact on your organisation? – No comment Associated costs comment – No comment Any other comments – No comments.
EDF Energy	Yes	Yes	Agree change comment – Yes - We support the change as we believe it will provide an obligation on LDSOs to communicate changes and readings the Meter Operator in a timely manner, which will improve getting the data at initial settlement right more often. For which role is your organisation impacted? – MOP Please state what the impact is – There will be some process changes required internally to ensure we could meet the 5 day turnaround time. Lead time comment – 60 days - This is due to resource requirements on SMART metering Would implementation in the proposed Release have an adverse impact on your organisation? – No Associated costs comment – There should only be operational impacts and no system changes, so we believe any costs would be for training of the new process requirements

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			Any other comments – No comments.
Electricity North West Limited	Yes	Yes	<p>Agree change comment – This change removes the requirement of having to de-energise a site prior to disconnection. The BSCP as it is means there should be two site visits when it does not appear to be logical to de-energise prior to disconnection, as the disconnection will remove any type of energisation of the site.</p> <p>For which role is your organisation impacted? – Distributor</p> <p>Please state what the impact is – There will be no impact on our organisation as this removes the current barrier to this process and our failure of the Annual audit.</p> <p>Lead time comment – 0 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No</p> <p>Associated costs comment – None</p> <p>Any other comments – No comments.</p>
GDF SUEZ Marketing Ltd	Yes	Yes	<p>Agree change comment – Yes - We support the clarification of the process for DNO led disconnections.</p> <p>However we are unsure how the process as written would work in practice. For supplier led disconnections if the LDSO accepts the disconnection, how would the supplier be aware of this in order to arrange the meter removal? Is it expected that if no rejection is received the disconnection will go ahead on the date requested?</p> <p>Also we would like to see clarification on lead times for both how long before a requested disconnection a D0132 is required to be sent to the LDSO and how soon after the disconnection</p>

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Organisation	Agree?	Impacted?	Comments
			<p>date the LDSO must update the SMRA.</p> <p>For which role is your organisation impacted? – Supplier</p> <p>Please state what the impact is – Revised disconnection process</p> <p>Lead time comment – 30 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No adverse impact.</p> <p>Associated costs comment – No cost</p> <p>Any other comments – No comments.</p>
IMServ	Yes	Yes	<p>Agree change comment – Yes - We agree that LDSO change of ES/Meter removals is a current issue and we believe these changes are an improvement on current process.</p> <p>For which role is your organisation impacted? – HH & NHH MOP</p> <p>Please state what the impact is – Possibly some LWIs/Process documentation/training</p> <p>Lead time comment – 90 days - Estimate based on the assumption that no system changes are required</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – None</p> <p>Associated costs comment – None - Estimate based on the assumption that no system changes are required</p> <p>Any other comments – No comments.</p>

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Organisation	Agree?	Impacted?	Comments
Northern Powergrid	Yes – with exceptions	Yes	<p>Agree change comment – Yes – with exceptions - We are in agreement that clarity is required and in general agree with the proposed solution. However we do not believe that Suppliers should be able to send the D0142 dataflow to LDSOs in order for them to remove the meter asset. We believe this process should remain with the Supplier/Meter Operator and is not the responsibility of the LDSO.</p> <p>For which role is your organisation impacted? – LDSO</p> <p>Please state what the impact is – Our processes for processing disconnections would need to be amended to take into account the new timescales etc.</p> <p>Lead time comment – 180 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – If Suppliers were to begin to issue D0142 for meter removals this would be a completely new process and would need to be addressed internally. This would be at a cost to us although we believe this activity should sit with the Supplier/Meter Operator.</p> <p>Associated costs comment – We are currently quantifying the costs that would be involved to facilitate this change.</p> <p>Any other comments – No comments.</p>
npower	Yes	Yes	<p>Agree change comment – Yes - We fully support this change as it will mandate the use of a D0139, which at present isn't always case as in many instances we have received a D0002, D0221 and D0139 or a combination of these flows. This change will make this process more robust and should lead to less manual fixes?</p> <p>For which role is your organisation impacted? – Supplier, HHDC, HHMOA, NHHDC, NHHMOA</p>

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			<p>Please state what the impact is – Positive impact only as the process is more clearly defined</p> <p>Lead time comment – 180 days - The acceptance of change could potential require further development of internal processes</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No adverse impact</p> <p>Associated costs comment – Not known at present</p> <p>Any other comments – There is currently no requirement for LDSO to inform supplier if they are unable to make the requested date shown on the D0132 and what tends to happen is for the actual date to be confirmed by LDSO via a D0125 after the event so we are unable as Supplier to advise MOA or DC of a definite date until after the event. Consideration should be given to adding an additional step which would the require notification of change of date by the LDSO on Supplier led disconnections.</p> <p>Could clarity be provided regarding the choice of timescales for 3.6.2 and 3.6.3 in BSCP514. Would it not be better to have HH and NHH timescales aligned?</p>
ScottishPower	No	Yes	<p>Agree change comment – No - ScottishPower note that the CP 1384 introduces changed timescales and processes from those in current practice and we have commented further below</p> <p>For which role is your organisation impacted? – Distributor, Supplier, NHHMOA</p> <p>Please state what the impact is – Changes to internal processes to meet the new requirements</p> <p>Lead time comment – 0 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – There would be considerable added responsibility potentially placed on LDSO to</p>

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			<p>recover and submit meters and readings to Suppliers</p> <p>Associated costs comment – The costs are not quantifiable at this time, though they are not likely to be material.</p> <p>Any other comments – We have a concern that CP 1384 and CP 1385 are both making changes to BSCP's 514 and 515, however the changes are not consistent within each CP. E.G. CP 1384 BSCP 515 section 3.6.8 seeks to add in text (emergency metering service only), whereas CP 1385 BSCP 515 section 3.6.8 seeks to delete the text 'or as required in emergency situations' and adds in a new section 3.6.10. This makes it very difficult to know what exact wording should be in section 3.6.8.</p>
SSE	Yes	Yes	<p>Agree change comment – Yes</p> <p>For which role is your organisation impacted? – Supplier & Party Agent</p> <p>Please state what the impact is – Minor changes to process</p> <p>Lead time comment – 30 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No</p> <p>Associated costs comment – Negligible</p> <p>Any other comments – No comment</p>
SSE Power Distribution	Yes	Yes	<p>Agree change comment – Yes – in part</p> <p>For which role is your organisation impacted? – LDSO</p> <p>Please state what the impact is – Positive – We believe this provides an enhanced customer experience. However should the change be approved in its current state additional costs would be</p>

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			<p>incurred for removal of meters. These are both technical and organisational impacts</p> <p>Lead time comment – 365 days - Currently SSEPD do not remove meters. If the use of the D0142 is approved technical and organisational development would be required</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – Yes as above</p> <p>Associated costs comment – Not known at this time</p> <p>Any other comments – We agree with the change however we do not support the use of D0142 to LDSO to remove a meter. This is a meter operator's task.</p>
TMA Data Management Ltd	Yes	No	<p>Agree change comment – Yes</p> <p>For which role is your organisation impacted? – N/A</p> <p>Please state what the impact is – N/A</p> <p>Lead time comment – 0 days</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – No comment</p> <p>Associated costs comment – N/A</p> <p>Any other comments – None.</p>
Western Power	No	Yes	<p>Agree change comment – No - Change as drafted does not reflect what LDSO actually needs to do. In addition, as the change seems to be intended to align the BSCP process with what is happening under the MRA, would it not be prudent to wait for ongoing MRA IREG discussions about changing the process to be concluded?</p>

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			<p>For which role is your organisation impacted? – LDSO</p> <p>Please state what the impact is – As drafted the change will prevent us doing what we need to do.</p> <p>Lead time comment – 270 days - Some system changes will be needed and, due to other development work expected for smart metering, we will require absolute minimum of 9 months’ notice from date of approval of the CP.</p> <p>Would implementation in the proposed Release have an adverse impact on your organisation? – Yes - We will not be able to deliver the changes within the proposed timescales. Even after the changes are made the new requirements will not allow us to work in a way that will meet the customers’ reasonable expectations.</p> <p>Associated costs comment – >£10,000</p> <p>Any other comments – We are supportive in principle to the aim of aligning the BSCP process with other codes and with what actually needs to happen on the ground. Unfortunately we don’t think this proposal has got it quite right. Elexon attend meetings of MRA IREG where the current disconnection process is being reviewed. Perhaps changes to the BSCP should be discussed there as part of a joint BSC/MRA change proposal.</p>

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Comments on the redline text CP1384					
No.	Organisation	Document name	Location	Severity Code	Comments
1.	British Gas	BSCP514	6.3.2.7		This refers to footnote 12 which only covers Supplier/MOA, therefore a new footnote is needed.
2.	IMServ	BSCP514	5.3.2.2	M	Ref: 5.3.2.2 could be clearer; I think the suggestion that MOP will send the D0139 to confirm that the ES already matches that in the D0134? If required I assume MOP will use the D0221 to reject the Request for ES change i.e. if they cannot attend?
3.	IMServ	BSCP514	5.3.3.1	M	FROM: 'Suppler or Supplier', is this a Typo?
4.	IMServ	BSCP514	6.3.2.10	H	In this step the LDSO is sending the Final NHH reading to the NHHMOA – The text says that the LDSO will do this by sending a D0139, however there is no reference to a D0010. I believe most NHH industry parties will not use reads provided in D0139 so in order to make this work the BSCP needs to state that the LDSO must send a D0010. Looking in the MRASCo Working Practice 30, this document suggests that readings should not be sent in the D0139.
5.	ScottishPower	BSCP514	5.3.1	M	Heading does not refer to this section being HH only, while all references below this relate to HH
6.	ScottishPower	BSCP514	5.3.1.4	L	Confirms 5 WD notice period for sending D0139 – later reduced to 2 WD which ScottishPower do not agree with.
7.	ScottishPower	BSCP514	5.3.1.5	L	Confirms 5 WD notice period for sending D0139 – however BSCP 515 section 3.5.3 reduces the timescale to 2 WD which ScottishPower do not agree with.

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8.	ScottishPower	BSCP514	5.3.2	M	Heading does not refer to this section being HH only, while all references below this relate to HH.
9.	ScottishPower	BSCP514	5.3.2.9	L	"TO" column should state Supplier/HHMOA for consistency.
10.	ScottishPower	BSCP514	5.3.2.10	L	Although not a change, the 2 WD to agree a date and time is not usually possible and dates and times are arranged by ongoing communication – suggest this is reflected as a "best endeavours" action.
11.	ScottishPower	BSCP514	5.3.2.15	M	Confirms 5 WD notice period for sending D0139 – later reduced to 2 WD which ScottishPower do not agree with.
12.	ScottishPower	BSCP514	5.3.3	M	Heading does not refer to this section being HH only, while all references below this relate to HH
13.	ScottishPower	BSCP514	5.3.3	H	ScottishPower Energy Networks do not currently carry such an activity on behalf of Suppliers and if requests were to be received direct from Suppliers we would require assessing and re-charging costs for same.
14.	ScottishPower	BSCP514	6.3.2	M	Heading does not refer to this section being NHH only, while all references below this relate to NHH.
15.	ScottishPower	BSCP514	6.3.2.2 & 6.3.2.8	M	See comment relating to 5.3.2.15 above. ScottishPower believe the 5 WD window relating to NHH should also apply to HH, as if anything the communication channel is more complex for HH Sites.
16.	ScottishPower	BSCP514	6.3.2.10	M	ScottishPower Energy Networks send D0139 to Supplier AND the NHHMOA. We believe this should be incorporated into BSCP as the Supplier is the Contracting Party and the NHHMOA is their appointed Agent. The Supplier should have the obligation of ensuring their Agent has and correctly processes the D0139. Otherwise it is left to the LDSO to follow up queries.
17.	ScottishPower	BSCP514	6.3.3	M	Heading does not refer to this section being NHH only, while all references below this

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					relate to NHH
18.	ScottishPower	BSCP514	6.3.3	H	ScottishPower Energy Networks do not currently carry such an activity on behalf of Suppliers and if requests were to be received direct from Suppliers we would require assessing and re-charging costs for same. Should there be a need for Engineering presence due to complex NHH metering on site, the request may come from NHHMOA and again the above may be applied.
19.	ScottishPower	BSCP514	6.3.3	M	The format of this section is not consistent with the preceding sections in that there is no separation of activities covering where NHHMOA or LDSO actions the request. We believe it would be clearer if a consistent format was adopted throughout the BSCP.
20.	SSE Power Distribution	BSCP514	5.3.3.1 6.3.3.1		D0142 flow does not currently get sent to LDSO. SSEPD would not support receiving these flows to remove meters as LDSO.
21.	British Gas	BSCP515			Whilst this is a settlement document, no mention is made of a DNO not being able to disconnect/de-register a GD MPAN except in emergency situations.
22.	British Gas	BSCP515	3.7.7		Given this process will apply for bulk disconnections it would seem simpler for the DNO if they always provide a meter reading rather than it being at a supplier choice when there could be multiple suppliers and potentially hundreds of MPANs involved.
23.	ScottishPower	BSCP515	3.6.1	L	Agreed
24.	ScottishPower	BSCP515	3.6.2	H	Not Agreed – the timescales have substantially changed from 5 WD (All HH) and 10WD (NHH when MOA involved) to 2 WD and 5 WD. The CP Aim was to achieve clarity and consistency, which is not the case here. I refer to BSCP 514 REFs 5.3.2.7 and 5.3.2.15 (for HH) and 6.3.2.4 and 6.3.2.10 (for NHH) and these existing timelines should be incorporated in 3.6.2.
25.	ScottishPower	BSCP515	3.6.3	L	This specifies the distinction in timing between HH and NHH rejection

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26.	ScottishPower	BSCP515	3.6.4	L	No requirement for NHH to agree time and date – see BSCP 514 section 6.3.2.2 where relates to date agreed in 6.3.2.1 which requires 10 days’ notice.
27.	ScottishPower	BSCP515	3.7	H	ScottishPower do not agree with this substantial re-write of the BSCP 515 when the Disconnection Process remains under existing review within WP 151 and the MRA process especially given that the DTC Flow is not yet established. We feel it would be more efficient and beneficial if the changes were postponed until the process and the flow details were finalised.
28.	ScottishPower	BSCP515	3.7.3	H	There is stipulation in WP 151 that a delimited flow is required and that 25 WD notice must be given to allow Supplier time to remove their assets. This should be referred to in BSCP 515 (even as a “best practice” if not yet mandated)
29.	ScottishPower	BSCP515	3.7.4	H	If a customer has been in direct contact with the LDSO and received and paid for disconnection quoted costs, ScottishPower Energy Networks do not see what reason a Supplier could have for objecting to what is a physical disconnection of the LDSO Assets. The only acceptable reason would be wrong MSID identified and perhaps this could be stated in the text. Note that other than emergency disconnections, single Distributor-Led disconnections have not yet been “approved”, only Bulk.
30.	ScottishPower	BSCP515	3.7.6	M	Point is trying to cover both options of Supplier-Led and LDSO-Led and is ambiguous.
31.	ScottishPower	BSCP515	3.7.7 & 3.7.8	M	Points could be combined as happens with other procedures (BSCP514 6.3.3.3)
32.	ScottishPower	BSCP515	3.7.9	H	Should this not occur within 5 WD of disconnection date (not stipulated here but should be). Footnote 23 also refers and should state within 5 WD as ultimately it is a change of Energisation Status that has occurred.
33.	ScottishPower	BSCP515	3.7.10	H	Agreed but reference (or a new 3.7.11) should be added to reflect BSCP501 3.9.4 which requires that SMRA must advise Supplier via D0171 and appropriate DC via D0209 DTC Flows.

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34.	SSE Power Distribution	BSCP515	Page 9 footnote 17		In an emergency situation it may not be possible to obtain a meter reading and recover the asset. It potentially could be unsafe to do so and should not be mandated.
35.	Western Power	BSCP515	page 4. Flow note for part 3.5.5	M	The flow note 13 has been amended to state the flow needs to be sent to all of the above recipients rather than stating it needs to be sent to the Supplier and MOA. However, the only recipients listed above are the Supplier and MOA. What is changing?
36.	Western Power	BSCP515	page 6 part 3.6.7	M	Why would the LDSO telephone the HHDC to inform them the MOA is on site? Presumably the MOA will know where he is and be able to phone the HHDC. Do not understand why this change is being made.
37.	Western Power	BSCP515	page 7 part 3.6.8	H	Why has the term "emergency situations" been changed to "emergency metering services only"? This will preclude us de-energising for other valid reasons such as safety or in response to requests from law enforcement agencies. The term "emergency situations" should be retained.
38.	Western Power	BSCP515	page 9 part 3.7.3	H	Await conclusion of discussions under MRA before making this step a requirement for all disconnections. Currently it only applies to "bulk" disconnection scenarios.
39.	Western Power	BSCP515	page 9 part 3.7.3 flow note 17	H	Disconnections are sometimes needed in emergency situations which are not "emergency metering services".
40.	Western Power	BSCP515	page 9 part 3.7.5 and flow note 18	H	LDSO is not dependent on Supplier accepting a scheduled disconnection. The Supplier may object on the basis that they believe the LDSO has selected the wrong MPAN but there is no right to object to the disconnection for other reasons. The LDSO may decide the disconnection will go ahead even in cases where a Supplier does not want it to.
41.	Western Power	BSCP515	page 9 part	H	LDSO should be able to reject a disconnection request if supply is still energised for

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			3.7.6		all metering systems, not just HH ones.
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Severity Codes

H (High): Prejudices document's conclusions, recommendations or fitness for purpose.

M (Medium): Matter of substance, but not high.

L (Low): Minor error but document's intention is clear.