

## Change Proposal Circular – CPC00740 Responses

CPC00740: Impact Assessment of CP1409

### Summary of Responses for CP1409

ORGANISATION	AGREE WITH THE CHANGE?	IMPACTED?	COST?	IMPLEMENTATION DATE?
British Gas	Yes	Yes	Yes	Yes
EDF Energy	Yes	Yes	Unknown	No
E.ON	Yes	Yes	Yes	Yes
G4S Utility and Outsourcing Services (UK) Limited	Yes	Yes	Unknown	Yes
IMServ Europe Limited	Yes	Yes	Yes	No
RWE Npower	No	Yes	Unknown	No
ScottishPower	Yes	Yes	Unknown	No
Siemens Operational Services	Yes	Yes	Unknown	No
SmartestEnergy Limited	Yes	Yes	Confidential	No
SSE Energy Supply Ltd	Yes	Yes	Unknown	Yes
SSEPD	Neutral	No	None	Neutral
TMA Data Management Ltd	Yes	Yes	Yes	Yes

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Organisation	Responses/Comments
British Gas	<p><b>How is your organisation impacted?</b> – Ensure contracted agents comply with new obligations</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Unspecified.</p> <p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> No comments.</p>
EDF Energy	<p><b>How is your organisation impacted?</b> – Possible system and process changes.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Costs and impacts have not been fully determined for this proposal.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No, with other industry changes already approved for implementation at this time we would prefer a date of February 2015.</p> <p><b>Any other comments?</b> No comments.</p>
E.ON	<p><b>How is your organisation impacted?</b> – As MOP and Supplier.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – There will be costs involved in implementing this change from a MOP perspective, however, we have not assessed fully what these will be, they are likely to be classed as 'small change' rather than requiring a full project delivery.</p> <p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> The time stamping of the NHH removal read was namely to demonstrate the actual removal read on the day is prior to HHDC actual data starting, removing the need for a 1 day settlement gap. It also has uses for billing purposes, however wherever the CoMC is across the same licence, re-dating the final read in line with NHHDC de-appointment would have to</p>

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	<p>continue, then be re-dated back 1 day in order to get into settlement unless NHHDC/DA can process a D10 a day after their appointment ends.</p> <p>Confirmation of meter commissioning does, in our view need to be included wherever there is transfer of the COP rating, regardless of being NHH or HH settled, and not just on a CoMC. This will likely be a DTC change of some variety within NHH &amp; HH MTD's so is likely to carry cost to implement the change in systems.</p> <p>Remove HH functionality – as well as the points mentioned, P272 &amp; other proposed changes, mean that all metering will likely have a requirement to be HH capable at some point in the next few years, it therefore seems pointless to be able to remove the functionality when at some point in the future it will be required again.</p> <p>P0028 100KW reporting to the panel – should be removed as does not currently give a full view of mandatory Comc's required by each supplier, perhaps SP04 only should reported?? We would also like to understand where this will sit when P272 comes into effect. (There would be a need to identify Cop 10 to COP 5 for 100KW systems changes under current COP arrangements).</p>
<p>G4S Utility and Outsourcing Services (UK) Limited</p>	<p><b>How is your organisation impacted?</b> – We will need to amend some user processes and setup and new process to transfer commissioning details to the HH MOP. The impact of this new process is unclear as we will need to agree this with each HH MOP.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Unknown, the most significant cost is likely to be in the transfer of commissioning details to the new HH mop, until we agree these processes with the HH mops it is unclear how much manual work this will be.</p> <p><b>Agree with the implementation approach? If not, why?</b> – Yes</p> <p><b>Any other comments?</b> We agree with these changes except for point 4. Although we agree with the principle that a D0150 confirming the removal of the NHH metering we do not believe there is sufficient information sent from the HH Mop to confirm that the NHH functionality has been removed. The NHH MOP would have to assume that receipt of a D0010 with final readings for</p>

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	<p>another MOP implied the NHH metering had ended. We also believe this may cause confusion for MAPs as there does not seem to be any requirement for the HH mop to confirm install of a HH meter or reconfiguration of the NHH meter to HH. This is like to mean the MAP receives a D0303 for the removal of the NHH meter whether or not the meter is removed but nothing to confirm the meter is still installed.</p>
IMServ Europe Limited	<p><b>How is your organisation impacted?</b> – The changes proposed will require changes to our MOP and HHDC systems.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – At least 40 man days effort, IT and business users.</p> <p><b>Agree with the implementation approach? If not, why?</b> No – the change to the HHDC system is a complex significant change that will require more than the allotted time to implement. We would like 12 months from the date that the change is agreed, so probably June 2015.</p> <p><b>Any other comments?</b> Yes. Regarding the Time element that needs to be included in the D0010 – as HH data is in GMT, should the time populated be the time in GMT rather than clocktime?</p>
RWE npower	<p><b>How is your organisation impacted?</b> – From an npower point of view this change is not supported on the grounds it adds more complexity to a process which is already a complex process. This would lead to more confusion &amp; miss understanding and would have an impact on our systems, in order to meet the new requirements.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – No comment.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No</p> <p><b>Any other comments?</b> The idea of using informal appointments (7.1.1 / 7.1.2) is problematic to MOA's as most if not all MOA systems require an appointment to be in place in order to allow a site visit to be raised. Npower feel that adding clarity to the</p>

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	<p>process for 'backing out' a failed CoMC would add more value than allowing a potentially complicated non DTC based process, especially as the most common reasons for failed CoMCs relate to physical works at sites which should be required far less if the bulk of CoMCs relate to P272. Also the redline process places no timescale around the issue of a D0155 after a successful CoMC if this method is utilised. This is problematic from a compliance point of view as there are no timescales placed around the official appointment of the new Supplier hub.</p> <p>Npower would like to ask why is the appointment process restricted to the DTC method when CoS is involved but not when it isn't?</p>
ScottishPower	<p><b>How is your organisation impacted?</b> – System Changes, which impact on our IT portfolio, in addition there may be contractual changes in the provision of HH services.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – No comments.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No, because while it will be relatively straightforward to amend the relevant BSCPs within the proposed timescale, the proposed changes in BSCP 514 section 7.1.13 indicates that the NHHMOA will be required to issue D0149, D0150 and D0313 flows to the HHMOA. In order for these flows to be transmitted it will require a DTC change to meet these requirements because the instance from NHHMOA to HHMOA does not exist at present. Given that the HHMOA will require to adapt their systems to receive the above three flows and that under the MRA process all systems require a minimum of 6 months lead time we believe the earliest implementation date will be February 2015 (assuming any DTC change is approved by the end of August at the latest). We believe that the BSCP changes should be synchronised with the proposed DTC change.</p> <p><b>Any other comments?</b> Agree with change given that the industry is moving towards greater HH settlement it seems prudent to put in place a process that allows a Change of Measurement Class (COMC) from NHH to HH.</p>

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Siemens Operational Services	<p><b>How is your organisation impacted?</b> – M98 will be moderately impacted. M98 portfolio system will require accreditation and testing for SIEM mpid in HHMOA role.</p> <p>Atlas (accredited HHDC system) will also be impacted and will require testing. Atlas may also need accrediting, depending on which system change option is chosen, due either to increase in volume of mpans or a second instance is required.</p> <p>IMMP does not require a system or process change, but does need to be either improved or replaced in order to handle extra volumes.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – This is not possible at this time as it depends on the staffing requirements to implement the Change. More staff would be required if there was a short lead time, as multiple systems would have to amended, tested, accredited in parallel. This approach is very likely to increase the cost of implementation.</p> <p><b>Agree with the implementation approach? If not, why?</b> – No. An implementation of November 2014 is not practical given the system changes that will be required; this would be less than six months lead time if the CP is approved in June. Plus we don't understand the urgency as this CP is to support Modification P272 which has already been pushed back to an earliest implementation of April 2016. We would propose an alternative implementation date of June 2015 at the earliest.</p> <p><b>Any other comments?</b> In the <u>Proposed Solution</u> section of the CP:</p> <p>Point 1 - Is there any impact moving from HH to NHH? There is not mention in the proposed solution.</p> <p>Point 3 - There are no commissioning test on NHH, therefore no commissioning details to be passed from NHHMOA to HHMOA. Does this commissioning refer just to the HHMOA?</p> <p>Point 4 – What is the list of information within the D0150 to be standardised?</p> <p>Point 5 – What does this change to move the requirement mean in practice?</p>

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	<p>Point 6 – We can stop producing and sending this report to the Panel when instructed. Please confirm that P0028 should continue to be sent to the supplier as per BSCP504 section 3.4.1.8 (not 3.1.4.8 as in CP1409)</p>
<p>SmartestEnergy Limited</p>	<p><b>How is your organisation impacted?</b> – Systems and processes will be impacted if the structure of flows changes.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – <b>confidential response received.</b></p> <p><b>Agree with the implementation approach?</b> – No. we feel that the timing is probably a bit tight. There should really be 9 months between approval and implementation to allow for system changes.</p> <p><b>Any other comments?</b> Please see detailed response below:</p> <p>Of the two options given under 1) “clarifying the appointment process options to improve interoperability” we believe that having concurrent MOP appointments is the best approach so that the supplier can be sure of getting the final read. This would require a system change for us but we feel that it is vastly superior to the second option which we feel henceforth should not be an allowable process because it introduces much more risk for error.</p> <p>We agree with 2) and 3) and we note that these are subject of MRA changes.</p> <p>4) We wonder whether it would be better to introduce a new flow in this instance. At the very least the existing flow should have its name changed so that it is clear that it can be used for a reclassification of a meter.</p> <p>5) We agree with removing the requirement to disable HH functionality on HH to NHH CoMC because, as stated, the supplier may wish to make use of HH data.</p> <p>6) It is important that this data is still reported to ELEXON for PARMs purposes.</p> <p>If removing the word “Panel” it should be replaced with the word “ELEXON”</p> <p>Ultimately this should stop and replaced with a report on “NHH not converted to Smart/AMR”.</p>

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SSE Energy Supply Ltd	<p><b>How is your organisation impacted?</b> – Via our Supplier Agents.</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – There will be I.T. development costs met our Supplier Agents.</p> <p><b>Agree with the implementation approach?</b> – Yes</p> <p><b>Any other comments?</b> In principle, we support this change.</p> <p>With reference to the transfer of commissioning details from the NHHMOA to the HHMOA, we suggest a change is made to the D0149, D0150 and D0268 flows to include the date of commissioning. This information is already recorded in the Wheatley MOP system.</p> <p>It is noted that, "a clarification that the flow should be sent to notify that the Meter has been removed or is no longer NHH." It is important for us to understand who is sending this to whom, and would welcome your response to this question.</p> <p>Acting as an HHMOA, we note that the initial transfer of register reads would only be relevant where a Change of Measurement Class coincides with a Change of Agent. We would not require the old MOA to provide full commissioning details, but would need to know that it had been successfully completed. It is important that notification of a logical meter removal should be reported by sending a new D0150 flow with the 'Meter Type' populated with 'H', as opposed to populating the 08 Group 'Meters Removed'.</p>
SSEPD	<p><b>Agree with the implementation approach?</b> – Neutral</p> <p><b>Any other comments?</b> No comments.</p>
TMA Data Management Ltd	<p><b>How is your organisation impacted?</b> – Our procedures will be impacted</p> <p><b>What are the associated costs on your organisation to implement the change?</b> – Low cost.</p>



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	<p><b>Agree with the implementation approach? If not, why?</b> – Yes</p> <p><b>Any other comments?</b> No comments.</p>

Summary of Comments on BSCP redlining		
Organisation	Document name & location	Comment
RWE npower	BSCP514, 7.1.4	How can this step reference a timescale of 5WDs from 7.1.3 when 7.1.3 may be invoked multiple times if the CoMC fails (where the informal process is used)? Could the timescale here not be 'within 2WD of a successful CoMC'?
	BSCP514, 7.1.7	This step is reliant on the MOA having received a D0155 and issued the D0011. This won't happen until after the CoMC is completed if the informal process is used and will result in the Supplier hub having to play catch up once they start to receive flows.
	BSCP514, 7.1.8	Should there be a 'by other means' option here as most MOA systems will not be able to do anything with the D0142 if no D0155 has been sent to appoint the site? We would still want to send a D0142 if no D0155 has been received.
	BSCP514, 7.1.9	The MOA probably cannot do this unless the MPAN has been created in their system via a D0155.
	BSCP514, 7.1.14	Why does the HHMO need to be qualified as a NHHMO? This is only relevant if the MOA is not changing. The new HHMO does not need to be NHH qualified. The reference to footnote 18 here makes no sense as footnote 18 refers to the MOA needing to be qualified for CVA and SVA rather than HH and NHH.
	BSCP514,7.1.18	This step requires a change to the DTC to allow instances of D0010 or D0002 between MOA.



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	BSCP514,7.1.20	The D0303 to the MAP has already been sent in step 7.1.5.