

'LOOKING BACK AT P272' INDUSTRY EVENT - CONCLUSIONS

Introduction

In February 2018, ELEXON hosted the 'Looking Back at P272' Industry Event. The event was attended by over 30 delegates, representing all parts of the Industry, including Suppliers, Supplier Agents and Distribution Network Operators (DNOs), and end customers. Representatives from Ofgem also attended to hear first-hand the discussion and debates, and the event was facilitated by ELEXON's Operational Support Managers (OSM), Performance Assurance Framework (PAF) experts and members of ELEXON's internal P272 team.

At the event, we agreed to publish a summary of the key points raised, both for those at the event, and those who were unable to attend. This feedback will also be provided to the ELEXON teams responsible for the future Half Hourly Settlement planning, as well as our Change Team, for consideration in any future pieces of work.

The general feeling from the participants was that there was a mixture of positive and negative elements of both the migration itself, and the background and preparation.

Interactions between Parties

One key element that came up in a number of contexts was interaction across the Industry. It was felt that the whole process provided some good opportunities for increased dialogue between Parties, and it allowed people to build new relationships which helped not only with the P272 work, but will also help with future work. However, there was misalignment in the way Parties approached this – for example, different software being used by Data Collectors (DCs) meant that Suppliers who wished to use their own Half Hourly (HH) DCs were sometimes unable to do so, as they were not protocol approved against certain Meter types. Similarly some customer-preferred HHDCs were not protocol approved and did not communicate this to their customers effectively. This was also true of Meter Operator Agents (MOAs) not being able to support all meter types, both of which caused consumer confusion.

Similarly, it was also highlighted that some Suppliers used the standard Change of Measurement Class (CoMC) process whilst some preferred the Working Practice (WP) 66 route, and others had bespoke arrangements with their Supplier Agents. These processes were further complicated by a CoMC having to take place at the same time as a Change of Agent (CoA) – Suppliers would have preferred the same Supplier Agents for Non-Half Hourly (NHH) and HH, but that was not always possible.

One other area highlighted was that DNOs were more involved in the processes that others initially considered, and thus a better awareness of their level of involvement would have helped all. Although not strictly considered an 'Industry' party, involving SIM providers and communications companies throughout would also have been very beneficial.

Supplier Agents noted the benefits of the Industry contacts list that was published. Suppliers asked why they didn't have access to it, and the Supplier Agents noted that if this had existed earlier that would have helped the migration in the initial stages.

ELEXON/Balancing and Settlement Code (BSC) and Ofgem Requirements

Parties did note that they found it difficult to compare the Supplier Licence Condition (SLC) 12 requirement, managed by Ofgem, which stipulates 'all reasonable endeavours' should be made to install Automatic Meter Reading (AMR) Meters, with the BSC requirement for 'all qualifying Meters'. It made it appear that the P272 process was significantly easier – but that certainly wasn't the case in reality.

The Industry did report that the open letters from Ofgem and ELEXON guidance notes and updates were very useful in providing clear information through the process, and would encourage more regular updates like this in the future and requested that these be published as quickly as possible. The issue of 'non-polling' AMR meters was raised, with some attendees feeling there was not enough (or early enough) guidance on how they should be captured and/or included.

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Workgroups, Industry Events and ELEXON Support

Some Industry participants felt that certain companies or roles were not well represented at the workgroups and Industry days and more issues could have been identified and addressed earlier in the process had there been wider representation. A suggestion was that ELEXON could explore ways to invite or encourage Parties to attend.

It was noted that the support from ELEXON, via the OSMs and the P272 team, was valuable and appreciated by Parties across the Industry.

End Customer Interaction

It was clear that the project and work was aimed solely at the Industry participants, rather than end customers. One of the key take-away items from the day was that more could have been done throughout the planning and implementation stages to engage with end customers. Some centralised communications (perhaps from Ofgem) would have been better than each Supplier, DNO or Supplier Agent giving different messages to individual customers and causing further confusion. This would also have helped in giving consistent messages around 'downgrades' from Profile Class (PC) 5-8 and how to approach customer refusals.

One interesting question was raised relating to the final benefits – were these made clear at the start, and have they been realised? If not, when do they now expect to be realised? The focus throughout the whole project seemed to be on 'just getting it done', not on the impacts or real benefits of the migration. It was noted that targeting PC 5-8 may have been too broad. Whilst larger PC 7-8 type customers would likely see the benefits, smaller demand customers may not. They may have been adversely affected by the higher charges associated with HH Settlement. Therefore, it was suggested that an alternative approach would have been to focus on size capacity or type of Meter.

Meter Changes

It was felt that the process led to a lot more Meter exchanges than was needed or envisaged. The number of issues with interoperability and D0313s that were missing, incomplete or incorrect have been documented a number of times. Data cleanses were really needed up front – and whilst Parties knew about the up-coming change for a while, a centrally driven or co-ordinated cleanse could have helped focus people on getting this done.

The volume of exchanges and site visits needed really put a pressure on resources across the Industry. It was quickly discovered that site visits were needed to confirm that a Meter was an AMR type – just the Meter Technical Details (MTDs) weren't always enough to confirm that.

Other BSC Changes, Modifications and Timescales

The feedback was that engagement in subsequent changes and Modifications was good, but it was again emphasised that ELEXON should investigate ways to involve Parties and party roles who normally aren't as involved in the change process. However, it was also noted that if the changes had been more thoroughly reviewed upfront, these subsequent changes may not have been required.

The extension to the timescales given by P322 was very beneficial, however it was noted that this didn't take into account that some contracts would already have been set for 18 months or two years. Also it was felt by many of the group that the 45WD migration requirement actually added another layer of complexity.

It was noted that the scheduling of certain ELEXON activities, such as the TAPAP checks, could have been arranged better with the P272 work in mind. This would allow parties to allocate resources more efficiently and to also aid in identifying certain issues, such as those relating to MTDs, earlier on in the process.

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Monitoring

Suppliers found the Performance Assurance Board (PAB) monitoring (Supplier Migration Plans and Updates) very difficult and confusing. They asked if, for any future reporting requirements, a workgroup could be set up, rather than just relying on the PAB direction and approval. The feeling was that this was a lot of work and the template was not very user-friendly, with very little feedback to Parties in terms of how this information was used or what it meant for the industry.

Also noted in this section was that it was difficult for Suppliers to create migration plans, as it would be Supplier Agents doing much of the actual work to migrate Metering Systems. It also didn't take consider instances where a visit was arranged but the visit then failed. This wasn't taken into account for the updates or subsequent reporting.

The latter reporting, where ELEXON highlighted the MPANs which it believed to be remaining, was considered a lot more useful and could have been implemented earlier to 'centralise' the structure more.

Finally, it was also highlighted that the single most useful thing would have been the ability to 'pause' things after a few months, to reflect on the process and make changes to ensure it could continue as smoothly as possible – or to have conducted a trial period up front. It was felt the Industry day held in 2016 was a turning point in this, but this could have happened earlier.

The one major outstanding question was 'what is the end point' – ie, when will Ofgem and the PAB consider the migration to be as complete as is possible, and thus this area just be monitored as BAU activity. ELEXON noted that this would be followed up with both Ofgem and the PAB at the next meetings.