

CP Consultation Responses



CP1495 'Introduction of a rejection response dataflow for a D0170 'Request for Meter System Related Details' request from the Meter Operator Agent to the Licenced Distribution System Operator where a D0215 'Provision of Site Technical Details' response is required'

This CP Consultation was issued on 6 November 2017 as part of CPC00782, with responses invited by 1 December 2017.

Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
British Gas	1	Supplier
BUUK Infrastructure	1	Distributor
E.ON UK	2	Supplier; Supplier Agent (DC/DA/MOA)
Electricity North West Limited	1	Distributor
IMServ Europe (UKDC)	1	Supplier Agent
Northern Powergrid	1	Distributor
Npower	6	Generator; Supplier; Non Physical Trader
Scottish Power	2	Supplier; Supplier Agent
Siemens Managed Services	1	Supplier Agent (HHMOA)
SP Distribution SP Manweb	1	Distributor
SSE Energy Supply Limited	1	Supplier; supplier Agent

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Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	1	Supplier Agent (HHDC, HHDA, NHHDC, NHHDA and MOA)
UK Power Networks	3	Distributor
Western Power Distribution	4	Distributor; Supplier Agent

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
British Gas	✓	✓	✓	✓
BUUK Infrastructure	✓	✓	✓	✗
E.ON UK	✓	✓	✓	✓
Electricity North West Limited	✗	✓	✓	✗
IMServ Europe (UKDC)	✓	✓	✓	✗
Northern Powergrid	✓	✓	✓	✗
Npower	✓	✓	✓	✗
Scottish Power	✓	✓	✓	✗
Siemens Managed Services	✓	✓	✓	✗
SP Distribution SP Manweb	✓	✓	✓	✗
SSE Energy Supply Limited	✗	✓	✓	-
TMA Data Management Ltd	✓	✓	✓	✓
UK Power Networks	✓	✓	✓	✗
Western Power Distribution	✓	✓	✓	✗

Question 1: Do you agree with the CP1495 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
12	2	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	Yes	We agree that CP1495, CP1496 and CP1497 are an improvement to the current process which is extremely resource intensive and creates confusion. The steps proposed should reduce both of these aspects and improve settlement as a result.
E.ON UK	Yes	We believe that the proposed solution has merit and would welcome the creation of a new data flow (D0215) to reject a D170 request from MOA to DNO. This adequately addresses the lack of a method or tool for a DNO to rectify current issues experienced in the industry as a whole.
Electricity North West Limited	No	<p>We have reviewed proposed solution from ELEXON and have identified a number of issues with the proposals.</p> <p>ELEXON has not presented any analysis on the reasons why companies are not responding to the D0170 flow. This is a fundamental part of the rationale as to why the creation of a rejection is required.</p> <p>Our systems will automatically trigger the D0215 upon receipt of a D0170. The consultation assumes that the trigger of a D0215 will provide the information to the MOA for the CT/VT. This is not the case as the only mandated information in a D0215 is the MPAN, Supply Voltage, Supply Capacity and number of phases (i.e. the CT/VT information is not automatically required in the return flow). The consultation does not recognise that this will need to be addressed or look to change the D0215 in its current drafting.</p> <p>As our systems automatically trigger the D0215, we would have no knowledge of why the D0170 was sent and if we currently hold the CT/VT information. This means that we would not be prompted to provide a rejection response with the appropriate code. At present, we receive an email through a mailbox and respond to the MOA with the information or a timetable to acquire it.</p> <p>We note ELEXON's position that this change will provide an audit trail for MOAs and provide further information on their next steps. Our position is that the MOAs can maintain an audit trail through the current process and that it also provides sufficient information to progress the commissioning process. This appears to place a cost burden on the rest of the industry for the benefit of MOAs.</p> <p>We therefore recommend that this CP is withdrawn as</p>

Respondent	Response	Rationale
		it does not (in a cost efficient mechanism) resolve the issues identified in the consultation.
IMServ Europe (UKDC)	Yes	The issues with the quality of information in the D0215 are widely recognised by MOPs, this CP is a positive towards improvements, however we will only see the benefits if it's implemented and used correctly by all DNOs.
Northern Powergrid	Yes	Yes, we agree with the proposed solution as it will allow us to formally respond to MOA requests for site technical details.
Npower	Yes	<p>CP1495 is reflective of the changes created by DTCP CP 3523. This CP confirms the details of a rejection flow from the LDSO to the HHMOA (Half Hourly Meter Operator Agent) as to why they are unable to produce a correct D0215 flow.</p> <p>Npower supports this change as per our comments in regards to DTC CP 3523, however we have a few concerns as noted below.</p> <p>D170 flows are raised by the HHMOA to acquire CT information from the LDSO / DNO. This is then followed up by a D0215 flow confirming those details. The HHMOA requires this from every new connection and change of agent to ensure that the CT ratio is correct on site and that they can install and commission the metering accordingly.</p> <p>Due to this, a rejection method is welcomed to ensure that HHMOA are notified if they are unable to gather the correct information and carry out the required work prior to going out on site.</p> <p>There are some concerns over the quality of the D0215 when received as roughly a third of them are blank upon the DNO sending this information across. This results in delays in installation and also could lead to potential impacts in the commissioning process and P283.</p> <p>The proposed solution here would therefore have to be discussed, to confirm what the timescales in regards to the flow are and if they are mandatory fields to ensure that this information is sent out correctly and on time. We would also recommend that the flow should contain Disconnected status as well.</p>
Scottish Power	Yes	Yes, we agree with the proposed solution
Siemens Managed Services	Yes	<p>Agree with the proposal of having a formal method of rejecting the D0170 request, and the proposed solution would provide a clear audit trail for this.</p> <p>However it does raise a concern that the D0170 flow request is rejected in circumstances when the LDSO may hold some of the optional site technical details that could have been provided on the D0215, and therefore this is not passed on to the MOA.</p> <p>It is unclear from the solution how the MOA is supposed to progress following receipt of the different D0170 rejection reasons. For example:</p> <ul style="list-style-type: none"> - If the rejection flow is received using the category 'Measurement transformers are not LDSO owned and

Respondent	Response	Rationale
		<p>are not yet adopted into LDSO ownership', is the expectation that the LDSO will send the D0215 (or the new commissioning data flow) once they have been adopted. Or, is the MOA supposed to periodically chase this by continuing to send D0170s?</p> <p>- If the rejection flow is received using the category 'LDSO is not the relevant System Operator (SO) for the Metering Point', is there an obligation on the MOA to identify the correct LDSO, or should the Supplier advise of this information?</p> <p>Please can clarification be provided on this.</p>
SP Distribution SP Manweb	Yes	<p>At present Distribution companies have no method of advising a party that they do not hold the requisite information requested via a D0170 flow and as such cannot advise a party of this position, therefore it seems sensible to introduce a new flow to allow the rejection of a request received via a D0170 where appropriate.</p>
SSE Energy Supply Limited	No	<p>We have assessed CP1495 alongside the equivalent DTC proposal, 'DTC CP 3523 – Creation of a new a new Flow to reject a D0170' as this is a cross-code issue. We would like to make it clear that support the principle of CP1495 and DTC CP 3523.</p> <p>Our response to the DTC CP is as follows,</p> <p>"We acknowledge that the current D0170 process is not working well. However, we are concerned by the scope of situations where the D0170 can be rejected.</p> <p>As raised at the ELEXON-led working group, we remain concerned with the question of ownership. If the D0170 is rejected because the LDSO does not own the equipment, we understand that the LDSO would reject the D0170, the MOA would inform the Supplier, who in turn may attempt to resolve with the LDSO. During this period, the Supplier is left with the problem that details of the equipment may not be known and therefore quite significant settlements risks are created. These settlement risks could also impact the customer.</p> <p>We're of the understanding that the LDSO liaises with the ICP as part of the New Connection and would need to know the relevant information before allowing the ICP to connect to their network. If this isn't the case, then the LDSO does at least appear to be in a good position to request the information given their direct engagement with the ICP. We suggest it is appropriate for the LDSO to be responsible for gaining this data, instead of passing back the issue to the MOA and Supplier to attempt to resolve.</p> <p>We are also of the understanding that as a result of some of the EFR work related to P283, LDSOs may have been out to sites to backfill previously missing records. Given LDSOs rights to access and, we believe, the relatively unobtrusive nature of gaining CT records (e.g. customers doesn't need to go off supply), we would envisage very few D0170s would need to be rejected.</p> <p>We believe the issue of LDSOs not owning equipment</p>

Respondent	Response	Rationale
		and therefore not being responsible for providing it, is something that should be reported back to TAMEG to gain their position prior to this change progressing.”
TMA Data Management Ltd	Yes	No rationale given
UK Power Networks	Yes	No rationale given
Western Power Distribution	Yes	We are supportive of the creation of a rejection flow for a D0170 request for site technical details, however, we have voiced our opinion in connection with the associated DTC Change Proposal in that the D0215 includes some compulsory non-measurement transformer related information plus some optional measurement transformer information. We therefore questioned whether rejecting a D0170 in its entirety was appropriate because some optional information was not available. We have been advised that this was discussed at the work group and MOA's were fully on board with the structure and functionality of the DXXXX D0170 rejection flow.

Question 2: Do you agree that the draft redlining delivers the CP1495 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
12	1	1	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
British Gas	Yes	No rationale Given
BUUK Infrastructure	Yes	No rationale given
E.ON UK	Yes	No rationale given
Electricity North West Limited	No	The proposed solution does not resolve the key issues. The draft text therefore cannot deliver the solution. We have noted a few issues with the text to support the process.
IMServ Europe (UKDC)	Yes	No further comments
Northern Powergrid	Yes	We agree that the proposed solution provides sufficient rejection reasons.
Npower	N/A	No rationale Given
Scottish Power	Yes	Yes, we agree the draft redlining delivers the solution for CP1495
Siemens Managed Services	Yes	Agree the draft redlining delivers the proposed solution, but feel that further clarification is required on the MOA obligations in relation to responding to the different rejection reasons.
SP Distribution SP Manweb	Yes	No rationale Given
SSE Energy Supply Limited	Yes	No rationale Given
TMA Data Management Ltd	Yes	No rationale given
UK Power Networks	Yes	No rationale Given
Western Power Distribution	Yes	No rationale Given

Question 3: Will CP1495 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
14	0	0	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Internal system changes to ensure processing and reporting of new dataflows where necessary
BUUK Infrastructure	Yes	We will need to amend our distribution asset database to be able to deal with exceptions and either respond automatically or provide to personnel in order to analyse. The latter part will be dependent on volumes and exceptions encountered.
E.ON UK	Yes	Whilst it will not have a large impact to us as a supplier, it would help with issues we currently experience, for example inaccuracy around CT ratios. As a MOA we would have to undertake a system and process update to include the new flow
Electricity North West Limited	Yes	We have internal systems which manage the dataflows across the business. The creation of a new dataflow proposed in the this consultation will require work on both the IT systems and processes to allow ENWL to detect, monitor and respond to the MOAs through the new flow and to modify the current approach of automatically responding to the D0170s with a D0215 if we do not hold the measurement transformer information.
IMServ Europe (UKDC)	Yes	Our 3rd party Wheatley MOP database (for NHH & HH) will need to go through the whole change cycle in order to be updated to accept and process the new flow. With this also comes changes to Operational documents and processes.
Northern Powergrid	Yes	Yes, this change will impact our organisation and will necessitate internal process and systems alterations to accommodate the new dataflow.
Npower	Yes	The impact to the business from this CP will fall in line with Supplier and HHMOA processes, the creation of a rejection flow and the two further flows (from CP 1496 and 1497) will result in changes to the Supplier/HHMOA processes (LWPS). On a plus note the impact of creating these flows would provide a further confidence in our settlement process and ensure that the customer has a correct CT ratio and commissioning carried out on their site and would also provide notification of why an appointment is not to go ahead saving the business money on failed on the day appointments.
Scottish Power	Yes	We will need to change our current process so that the appropriate action is taken depending on the rejection reason code

Respondent	Response	Rationale
Siemens Managed Services	Yes	<p>There will be impact to our organisation in the role of MOA; system and associated process changes will be needed to support the introduction of this new data flow.</p> <p>Detailed system analysis will be required to specify the changes needed to our MO portfolio application and data flow routing functionality, followed by the actual software development and testing.</p> <p>Minor changes will be required to operational business processes, with updates to associated training documentation/ user guides.</p>
SP Distribution SP Manweb	Yes	We will have to implement IT system changes to allow us to send the new data flow as and when required.
SSE Energy Supply Limited	Yes	We will need to implement business process and system changes for our HHMOA business to manage the new data flow.
TMA Data Management Ltd	Yes	It would impact our systems and procedures.
UK Power Networks	Yes	No rationale Given
Western Power Distribution	Yes	Systems changes will be required to accommodate the population of this data flow.

Question 4: Will your organisation incur any costs in implementing CP1495?

Summary

Yes	No	Neutral/No Comment	Other
13	0	1	0

Responses

Respondent	Response	Rationale
British Gas	Yes	Mostly one off configuration costs
BUUK Infrastructure	Yes	Costs are unknown at present
E.ON UK	Yes	We will incur one-off IT costs to implement the new flow into our system.
Electricity North West Limited	Yes	As identified above, ENWL will incur costs relating to the changes in IT systems and business processes. We anticipate that these will be a one off cost of approximately £30,000. At this present time, we have not established if there will be any ongoing costs as this will need to be reviewed as part of the business solution.
IMServ Europe (UKDC)	Yes	Development costs are a one off; we also expect small ongoing costs for managing the new flows once they arrive.
Northern Powergrid	Yes	The changes required to systems and processes will have associated costs, though we cannot estimate these at present as a full impact assessment by our IT provider is required.
Npower	N/A	We cannot comment on the implementation costs at this time.
Scottish Power	Yes	There will be a one-off cost to allow the new rejection flow to be processed.
Siemens Managed Services	Yes	There will be internal costs associated with analysis, design, testing, process updates, and external costs will be incurred for software development. Without confirmed details of the flow structure and content at this stage, it is not possible to obtain estimates for timescales or cost of this work.
SP Distribution SP Manweb	Yes	As with all IT system changes there is a cost, however at this time it is not possible to quantify such costs.
SSE Energy Supply Limited	Yes	There will be on-off costs to implement the new process to manage these flows, and some ongoing costs to operate the new process.
TMA Data Management Ltd	Yes	There would be low to medium costs involved with the development, testing and implementation of CP1495.
UK Power	Yes	No rationale given

Respondent	Response	Rationale
Networks		
Western Power Distribution	Yes	Cost will be incurred in making the necessary company policy document changes, amending company systems and processes, and to briefing / training staff on the revised requirements. These will be one off costs.

Question 5: Do you agree with the proposed implementation approach for CP1495?

Summary

Yes	No	Neutral/No Comment	Other
4	9	0	1

Responses

Respondent	Response	Rationale
British Gas	Yes	No rationale given
BUUK Infrastructure	No	<p>We recently responded to the MRA impact assessment of the introduction of the new D0170 rejection flow with the following comments:</p> <p>We would prefer a longer implementation date on the basis that requirements under Faster Switching have yet to have a final baseline on design and this will ultimately require changes to our system which will require requalification. D0170 flows are currently processed automatically and the changes proposed will require us to build more logic into the system in order to handle exceptions and/or source more personnel to analyse exceptions. As these changes will have a significant impact on our systems it seems redundant to requalify and then have to requalify again 6 months later.</p> <p>We note Elexons response as follows:</p> <p>Any Risk and Impact Assessment process should ascertain whether a change has the potential to materially impact the Settlement process and/or a Qualified Person's obligations under the BSC should that change not be appropriately implemented. We do not foresee DTC CP3523 and the associated BSC CP CP1495 as having a material impact that will require requalification. These proposed changes improve current processes and reinforce current BSC obligations.</p> <p>My understanding of the Faster Switching work is that any change could be implemented in June 2019 at the earliest. We do not foresee that this has an effect on DTC 3523 and BSC CP CP1495.</p> <p>We accept and welcome these comments however we did not previously clarify that the system and process changes alone would still be significant enough to warrant a November 2018 implementation in our view and that June 2018 would be too soon.</p>
E.ON UK	Yes	We agree that it makes sense to introduce the BSC and DTC changes at the same time.
Electricity North West Limited	No	We do not agree with the proposed solution in Question 1.
IMServ Europe (UKDC)	Yes	No further comments

Respondent	Response	Rationale
Northern Powergrid	No	Although we approve the change in principal, we reject the proposed implementation date due to significant system and process changes required internally. Due to the level of changes required within the organisation, we would prefer a November 2018 implementation date
Npower	No	Implementation should not be before November 2018. Since the related MRA change (DTC CP 3523) implementation date is now November 2018, the implementation for CP 1495 should also be pushed back to that date.
Scottish Power	No	We would prefer a November 2018 implementation date, as related changes CP1496 and CP1497, if approved will require significant process and system changes.
Siemens Managed Services	No	Agree the implementation should coincide with MRASCO's DTC Change proposal, but we would require a longer lead time in order to adequately design, develop and test the system changes required to facilitate the new data flow. The volume of development work required would not be able to be achieved until the November 2018 release at the earliest. We note similar comments on timescales and implementation dates in the responses to the MRA consultation on DTC CP 3523, which defines the new rejection flow; with the majority of respondents saying that a June 2018 implementation is not practical and proposing a November 2018 or February 2019 date.
SP Distribution SP Manweb	No	Given that the associated MRA changes have now been given a revised implementation date of November 2018, we believe that it makes sense to implement both the MRA changes along with CPs 19495 1496 and 1497 simultaneously as they are intrinsically linked, therefore the proposed BSC changes implementation date should be altered to November 2018 to ensure that this happens.
SSE Energy Supply Limited	Other	We agree that there should be a minimum 6 month lead time between the approval of this BSC CP and the equivalent DTC CP and therefore accept the June 2018 implementation date that has been proposed. However, we note that MDB (30/11) approved a November 2018 implementation date and we expect this BSC CP to be implemented in November 2018.
TMA Data Management Ltd	Yes	No rationale given
UK Power Networks	No	At November MDB (MRA Development Board) meeting, it was agreed to amend the implementation date of DTC CP 3522 and DTC CP 3523 to 1 November 2018. Therefore it seems pragmatic for CP1495 to also be implemented on 1 November.
Western Power Distribution	No	We believe that the implementation date should align with the associated DTC change, and therefore should be amended to 1st November 2018.

Question 6: Do you have any further comments on CP1495?

Summary

Yes	No
4	10

Responses

Respondent	Response	Comments
British Gas	No	No further comments
BUUK Infrastructure	No	No further comments
E.ON UK	No	No further comments
Electricity North West Limited	No	No further comments
IMServ Europe (UKDC)	Yes	<p>Currently the D0215 can be sent from LDSO to Supplier, will the new D0170 rejection flow also go to the Supplier?</p> <p>Will it be mandatory for all LDSOs to implement the new rejection flow, or could LDSOs choose to carry on as they do now i.e. keep sending D0215s with incorrect information?</p> <p>A DNO can reject a D0170 on the basis that they have not yet taken ownership of the Measurement Transformers and the MOP should re-send the D0170 at a later date.</p> <p>How long is this period, how will MOP decide when to re-trigger the D0170?</p> <p>When KPMG conduct their audit will they consider a rejected DNO flow as a completed process?</p>
Northern Powergrid	No	No further comments
Npower	No	No further comments
Scottish Power	No	No further comments
Siemens Managed Services	Yes	As per the concerns raised against Question 1, we would request clarification on what (if any) action the MOA is supposed to take, depending on the rejection reason received.
SP Distribution SP Manweb	No	No further comments
SSE Energy Supply Limited	Yes	As discussed at the BSC-led working group and MDB (30/11), SSE remains concerned by the impact of non-LDSO owned equipment on the D0170/D0215 process. As noted by Elexon in BSC CP1496, the LDSO owns the equipment in the majority of cases. Where the LDSO does not own the equipment we are

Respondent	Response	Comments
		<p>of the understanding that this information is necessary for the LDSO to manage their network and will be known when the connection is agreed. We therefore believe that it would be more appropriate for the LDSO to be responsible for sourcing this information in all cases, irrespective of whether they own the equipment, instead of passing the issue back to the Registrant to gather the information. We accept the BSC currently defines the Registrant as being responsible for gathering this data (where the LDSO does not own) but challenge whether this is the right approach. Continuing this process means that the HHMOA requests the information, LDSO rejects, HHMOA notifies the Registrant, Registrant then investigates (including asking LDSO), etc. This prolonged process creates settlement risks and in our view is not efficient. A more sensible approach would be to place the requirement on the LDSO to gather the information at the start of the process and hold the record alongside the records they already hold for their own equipment. This would mitigate the settlement risks and improve the efficiency of the process.</p> <p>We understand that Elexon have this issue on their work plan and would be pleased to provide our support in this area.</p>
TMA Data Management Ltd	No	No further comments
UK Power Networks	Yes	Will Elexon be providing any guidance notes regarding CP1495?
Western Power Distribution	No	No further comments

BSCP514

Respondent	Location	Comment
Electricity North West Limited	P4 5.2.1.11	Footnote link error - Error! ookmark not defined.

BSCP515

Respondent	Location	Comment
Electricity North West Limited	P3 3.3.4	Inconsistent colouring of flow name with the rest of the document and consultation
	P5 3.11.2	Method text "Electronic or other method, as agreed." Appears to be in bold and possibly in a different font size/style.

SVA Data Catalogue Volume 1

Respondent	Location	Comment

SVA Data Catalogue Volume 2

Respondent	Location	Comment