

Report Phase Consultation Responses



P432 'Half Hourly Settlement for CT Advanced Metering Systems'

This Report Phase Consultation was issued on 15 June 2022, with responses invited by 1 July 2022.

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

Consultation Respondents

Respondent	Role(s) Represented
Western Power Distribution	Distributor
TotalEnergies	Supplier
Siemens MAS	DC, DA, MOA
TMA Data Management Ltd	Software Provider
Centrica	Supplier
Salient Systems Ltd	HHDC ,HHDA, NHHDC, solutions provider
SSE Energy Supply Limited	Supplier
SMS PLC	CVA MOA, SVA NHH/HH MOA, DC, DA
Scottish and Southern Electricity Networks	Distributor
Scottish Power	Supplier, MOA

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Question 1: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P432?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	We believe that the redlined changes to the BSC deliver the intention of P432.
TotalEnergies	N/A	
Siemens MAS	Yes	
TMA Data Management Ltd	Yes	TMA can see the benefits as a HH agent.
Centrica	Yes	
Salient Systems Ltd	Yes	
SSE Energy Supply Limited	Yes	
SMS PLC	Yes	
Scottish Power	No	ScottishPower does not agree with the implementation date of October 2023 . This change should be implemented in line with MHHS programme2024/25, by implementing this change earlier will result in additional costs and already limited resources being taken away from the programme for little or no benefit to the industry. Further to the above, there will be additional costs to the customers 18 months ahead of the implementation of the MHHS programme, at a time that customers are already experiencing the impacts of higher cost of living.

Question 2: Do you agree with the Panel that the redlined changes to the Code Subsidiary Documents deliver the intention of P432?

Summary

Yes	No	Neutral/No Comment	Other
7	1	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	We believe that the redlined changes to the Code Subsidiary Documents deliver the intention of P432.
TotalEnergies	N/A	
Siemens MAS	Yes	
TMA Data Management Ltd	Yes	TMA can see the benefits as a HH agent.
Centrica	Yes	
Salient Systems Ltd	Yes	
SSE Energy Supply Limited	Yes	
SMS PLC	Yes	
Scottish Power	No	As above Q1.

Question 3: Do you agree with the Panel's initial recommendation that P432 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	
TotalEnergies	N/A	
Siemens MAS	Yes	
TMA Data Management Ltd	Yes	
Centrica	Yes	
Salient Systems Ltd	Yes	
SSE Energy Supply Limited	Yes	
SMS PLC	Yes	
Scottish Power	Yes	

Question 4: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
4	5	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	No	No we do not agree with the implementation date. WPD will have 15,000 new HH customers that will require connection agreements. These would need to be set up by October 22 as this is when the customers will begin to migrate.
TotalEnergies	No	We have concerns outlined in question 7.
Siemens MAS	Yes	
TMA Data Management Ltd	Yes	
Centrica	No	We do not think that P432 should be implemented and therefore cannot agree with the recommended Implementation date.
Salient Systems Ltd	Yes	P432 implementation date needs to enable this activity to be completed prior to MHHS so the recommended implementation date is appropriate.
SSE Energy Supply Limited	No	We do not agree that the modification should be implemented.
SMS PLC	Yes	
Scottish Power	No	ScottishPower does not agree with the implementation date of October 2023 . This change should be implemented in line with MHHS programme2024/25, by implementing this change earlier will result in additional costs and already limited resources being taken away from the programme for little or no benefit to the industry. Further to the above, there will be additional costs to the customers 18 months ahead of the implementation of the MHHS programme, at a time that customers are already experiencing the impacts of higher cost of living.

Question 5: Do you agree with the Panel's initial recommendation that P432 should be rejected?

Summary

Yes	No	Neutral/No Comment	Other
5	5	0	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	<p>Yes, even though the movement of customers to HH is the expected direction customer sales and data will be going forward, there has been far too little Cross Code collaboration for this process to work.</p> <p>For P272 where WPD had 19,000 of customers to be migrated from NHH to HH capacity charging, charging working groups were set up, DCP's were raised to protect customers if the deemed capacity was too high or too low for their needs. Even with all of this there were a lot of issues, and customers not happy at being forced to change their charging regime.</p>
TotalEnergies	Yes	We would agree, it is a distraction from the main MHHS delivery and we have operational concerns with its implementation outlined in question 7.
Siemens MAS	No	<p>The primary justification for P432 is to reduce the risk of MHHS implementation by moving the higher consuming sites with CT Metering Systems into the <i>de facto</i> advanced segment ahead of MHHS implementation. This is an efficient and practical step that is expected to reduce risk whilst at the same time highlight problems ahead of the far greater transition scheduled within the implementation programme. It is considered that any early work that is relatively low in effort and reduces the burden of MHHS implementation should be progressed.</p> <p>Additionally, actual interval data entering settlement is of a greater accuracy than settlement based on estimations. This has a number of benefits including a greater understanding of customer behaviour enabling innovation and competition. This is an argument for MHHS and P432 theoretically provides this opportunity in advance of MHHS implementation.</p>

Respondent	Response	Rationale
		For these reasons Applicable BSC Objectives (c) and (d) appear to be better facilitated.
TMA Data Management Ltd	No	
Centrica	Yes	<p>We agree with the Panels initial recommendation that P432 should be rejected.</p> <p>Given the current market conditions we believe it would be wrong to potentially increase costs for a subset of customers who would be impacted by P432.</p> <p>We believe proposals such as these should be progressed within the MHHS programme where all the impacts can be assessed together and should not be progressed as a separate modification.</p> <p>We disagree that these proposals will de-risk the main MHHS programme as these proposals may well divert Supplier resources required to support the main programme.</p>
Salient Systems Ltd	No	P432 implementation will help drive innovation and competition with greater granularity of data (BSC objective c). Implementation on the suggested dates will help reduce risk in the MHHS project, providing extra experience and insight to problems that will become useful during MHHS (BSC objective b). It will also increase settlement accuracy (BSC objective d).
SSE Energy Supply Limited	Yes	We agree that P432 should be rejected. The cost exercise and analysis show a disbenefit to customers if the modification is implemented, as well as costs to BSC parties.
SMS PLC	No	Though we agree with the reasons behind the Panel's initial recommendation, as a Supplier Agent that went through P272, getting a 'head start' on moving meters from NHH to HH pre MHHS would be preferable.
Scottish and Southern Electricity Networks	No	SSEN supports the idea of CT Metering going HH and think it is key to start that process now before MHHS goes live, this will give SSEN a chance to manage the B12 faults that will arise as the CT work ramps up.
Scottish Power	Yes	

Question 6: Do you agree with the Panel's initial view that P432 should not be treated as a Self-Governance Modification?

Summary

Yes	No	Neutral/No Comment	Other
8	0	1	0

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	
TotalEnergies	N/A	
Siemens MAS	Yes	
TMA Data Management Ltd	Yes	
Centrica	Yes	These proposals will have a significant impact on Suppliers and consumers and therefore the modification should not be progressed as a self-governance modification.
Salient Systems Ltd	Yes	I concur with the workgroup conclusions.
SSE Energy Supply Limited	Yes	
SMS PLC	Yes	
Scottish Power	Yes	Due to the additional material cost impacts to consumers, as a result of a higher cost to serve for HH customers, at a time where they are already experiencing high cost of living.

Question 7: Do you have any further comments on P432?

Summary

Yes	No
5	4

Responses

Respondent	Response	Rationale
Western Power Distribution	Yes	<p>WPD estimate that our LV and LV Sub HH customers will go up in number by approx. an extra 3rd. As the Profile Class 3 and 4 customers that migrate across will be towards the smaller end of the LV and LV Sub HH market.</p> <p>This will have a significant effect on reducing the TCR band levels. I.e. Some customers that were Band 1 will become Band 2, some Band 2 will become Band 3 and some Band 3 will become Band 4.</p> <p>Customers that have adjusted their capacity by over 50% to move bands may find that they are back in their original band.</p>
TotalEnergies	Yes	<p>We do have concerns, what happens if a customer refuses to be settled HHly. We have examples of customers who are not supportive of being settled in that way.</p> <p>The bigger problem is the industry data quality needs to be resolved, particularly DNO data. CT information we have access to, such as Meter Technical Details can be of poor quality which will impede the ability to deliver the change.</p> <p>If they are not addressed beforehand we would prefer a delay to the implementation.</p> <p>There is also an element of this change being a distraction from delivering MHHS, this is not seen as insurmountable, but the more changes introduced like this will take time and resources away from delivering MHHS properly. We only have limited skilled resources able to deliver a programme like MHHS (as Ofgem have said it's seen as the biggest change since 1998) and that limits our capability to do other things.</p>
Siemens MAS	No	

Respondent	Response	Rationale
TMA Data Management Ltd	No	
Centrica	No	
Salient Systems Ltd	No	
SSE Energy Supply Limited	Yes	As well as agreeing with the Panel that P432 should be rejected, we would like to reiterate our view, which we expressed in the previous consultation, that changes of this nature should be implemented as part of the MHHS Programme and not taken forward outside of the Programme. P432 also does not look at cross-code impacts, such as the impact on the DCUSA.
SMS PLC	Yes	Even when considering the comments given regarding the customer journey, we still believe that the CCDG's recommendations should be implemented.
Scottish Power	Yes	Can we please have clarification if there are to be new NHH performance targets as a result of these meters with higher metered volumes moving to HH. Can you please clarify what the derogation process, if we are not in a position to complete this activity as it is proposed. Further to our previous consultation response we had been advised that this was being looked into and we have yet to have received a response.