Send Back Consultation Responses

P432 'Half Hourly Settlement for CT Advanced Metering Systems Insert Mod title'

This Send Back Consultation was issued on 11 October 2022, with responses invited by 25 October 2022.

Consultation Respondents

Respondent	Role(s) Represented
IMServ Europe	Supplier Agent (HHDC)
Power Data Associates Ltd	Supplier Agent [PDAL]
Market Wide Half Hourly Settlement Programme	Other [MHHSP]
Northern Powergrid	Distributor
Centrica	Supplier
Stark	Supplier Agent [HHDC, NHHDC, HHDA, NHHDA. MOA]
BUUK	Distributor
Scottish Power	Supplier, Supplier Agent
SSE Energy Supply Limited	Supplier
Npower Commercial Gas Limited (NATP Supplier) /E.On Next Limited (EOND)	Supplier
TMA Data Management Ltd	Supplier Agent [HHDC, HHDA, NHHDC, NHHDA]
National Grid Electricity Distribution	Distributor
Business Energy Direct	Consultant
Shell Energy UK Limited	Supplier
SMS PLC	Supplier Agent [CVA MOA, SVA MOA/DC (NHH&HH)]

ELEXON

Phase

- Initial Written Assessment
- Definition Procedure
- Assessment Procedure
- Report Phase
- Implementation

Question 1: Do you agree with the Workgroup's majority view that P432 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
9	4	1	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	In line with Ofgem's letter to industry to 'progress chase' the industry to deliver MHHS this is an essential step on that path to reduce the risk of MHH migration being extended. It delivers the benefit of HH settlement to this group of customers who are larger consuming customers earlier hence delivering some of the MHHS benefits earlier. It maximises the resolution of administrative issues such as Agreed Supply Capacity in a timely manner improving the customer experience. It provides an incentive to industry participants to improve the accuracy of the new data item - Connection Type being introduced in 2023 (CP1558). By correctly setting the item to show whole current vs. CT connections.
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We agree with the Workgroup that Applicable BSC Objective (c) may be positively impacted but this is subject to Supplier retail offerings and ensuring that an appropriate capacity is agreed with the customer. As such, this objective could equally be negatively impacted. LDSOs will need Suppliers to engage and provide information to ensure an appropriate capacity is used. We believe that, in the round, P432 will have a neutral impact on the other Applicable BSC Objectives. We recognise the differing views within the Workgroup in relation to Applicable BSC Objectives (c) and (d). It is essential that consumers

Respondent	Response	Rationale
		do not suffer as a result of something 'done to them', and therefore need to be informed as to what is changing, when, and what it means.
Centrica	No	We believe that P432 has a neutral impact on the BSC Applicable Objectives
Stark	Yes	We still agree with Workgroup's view with reference to these Objectives. Whilst we are aware of the concerns raised around potential costs to Consumers & Suppliers we consider that meeting the Ofgem send-back requirements will support this, particularly the requirement for a DCUSA change as this was originally recommended being in place by the CDCG to facilitate the migration of NHH CT advanced meters, prior to migration to the MHHS TOM segment plus the amended suggested timelines.
BUUK	Yes	None provided
Scottish Power	No	Scottish Power does not agree with the new proposed implementation dates. This change should be implemented in line with MHHS programme 2025/2026 which is currently undergoing a replan and the dates referenced in the consultation will be subject to change. For examples, the M11 milestone has a referenced target date of Oct 2024 but the replan now proposes Aug 2025, the M14 milestone has a referenced target date of February 2025 but the replan proposes the end of March 2026. Although still fluid, the current replan milestone dates are significantly different than the dates proposed in this consultation and we would expect the replan dates to be closer to the version of the plan that will be approved later this year. 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.
SSE	No	If Objective C was better facilitated, and it was better for customers then suppliers would already have installed HH metering. Merely making something mandatory that is already optional takes away customer choice and so it could be argued

Respondent	Response	Rationale
		reduces competition in supply, as it would make these customers less attractive to other suppliers. We believe that this change should be progressed under the MHHS Programme, and so progressing it under this separate BSC modification is leading to Objective D being detrimental, as it is inefficient to do so.
Npower/E.on	Yes	We believe applicable code objective C is better facilitated because this Modification will promote more accurate and granular settlement data which will enable innovation and competition, Objective D is better facilitated because it will simplify and clarify the BSC arrangements for HH settled CT metering systems and consequently better facilitates efficiency in the implementation and operation of the BSC.
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	No	The opinion of Business Energy Direct has not changed since the first consultation, an opinion formed based on logical consideration of the facts presented in the consultation. Since then, further information has been presented as part of the Send Back Consultation, with such ratifying the decision of the BSC Panel to recommend to OFGEM that P432 should be rejected. We suspect that an error was made by Elexon when issuing the first consultation to industry, the question asked was 'Do you agree with the Workgroup's initial unanimous view that P432 does better facilitate the Applicable BSC Objectives than the current baseline?' This was worded in such a way that it was misleading and potentially coercive. The wording was evident in the consultation response document, so it's likely the online consultation response document showed the same. The Workgroup's initial view was not unanimous, it was a majority view, and several members of the group stated that they didn't believe that P432 meets that Applicable BSC Objectives.

Respondent	Response	Rationale
		It is notable that of the (just) 9 responses to the first consultation that all but one of the 5 suppliers believed that P432 doesn't meet the Applicable Objectives. The one supplier that does believe it meets the objectives is the very Proposer of P432. Suppliers are much better placed than the other responders to identify the impact that P432 would have on the industry and customers, should it gain approval and they obviously had other data sources to fall back on to further support the information and data provided in the initial consultation. Excluding Business Energy Direct, the 3 remaining responses were provided by Data Collectors, none of which have access to the same information that the suppliers and Business Energy Direct do and with a clear difference of opinion between these two sectors of industry, it is evident which sector has used logical reasoning and facts, and which sector believes it makes for an easier life, so have therefore dismissed the facts. The BSC Panel, OFGEM and all other interested industry parties need a clear reminder of what objective C is. (C) promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity If a proposal fails to meet one of the two BSC objectives, (as irrefutable evidence provided alongside both the original consultation and the send back consultation shows) then it fails to meet the objectives. Meeting one of the two objectives isn't acceptable and whilst it is easy to see why objective D would be met (accurate consumption data facilitates more accurate settlement), approval of P432 would result in the very opposite of objective C, because the customers responsible for the circa 50,000 supply points will have vastly reduced supplier choice. This is evidenced in the cost exercise 2 of each consultation. A third exercise was carried out by Business Energy Direct that highlighted huge pricing disparity between NHH and HH settled CT metered supplies, with HH settled supplies being subjected to 26% higher costs on average (across 10 different suppliers and 4 different consumption brackets).

Respondent	Response	Rationale
		When asked in the initial consultation if customers would be faced with higher costs if P432 was approved, along with our view, 4 suppliers and a data collector stated Yes, with no responders disagreeing and three responders (including the proposer) remaining neutral. Cost increases are partly attributed to some suppliers taking advantage of reduced competition in the Half Hourly market and also increased costs associated with serving Half Hourly settled customer accounts, especially relatively low consuming ones (below 250,000 kwh year) Business Energy Direct are part way through a fourth exercise, one which will be shared with OFGEM once completed. This exercise includes around 130 Half Hourly settled supplies, each registered with the Proposers company under the Eon Next brand. Along with around 1250 other supplies they were migrated to Eon Next as part of a SoLR (Supplier of Last Resort) arrangement in August 2021. Following the expiration of SoLR period, in April 22 Eon Next moved all accounts from the SoLR pricing structure that was agreed with OFGEM, to new tariffs for the period beyond April 22. The average price per Kwh being charged for NHH settled supplies is 31.3p per Kwh with a daily standing charge of 78p The average price per Kwh being charged for HH settled supplies is around 45.5p with a daily standing charge of 181p. This price difference means that a typical customer pays around £9000 per year more, exclusively because of their settlement status, something that entirely discredits the Proposer's response to the cost exercises. Along with the Proposer declining all invitations to provide any cost examples from their (supplier) perspective, this 4th exercise evidences that the Proposer's company has a vested financial interest in attempting to ensure that P432 gains approval. There is however yet more evidence of to support this. Business Energy Direct have been working with suppliers to ensure that Change of Measurement Classes are being carried out where appropriate (HH

Respondent	Response	Rationale
		to NHH) with approximately 10 suppliers having completed at least one to date. The Proposer's company have been asked to complete a CoMC on multiple supplies, several times, yet they have absolutely refused to do so, with the response being that they have 'taken a business decision not to do them'. This stance results in the Proposer's company failing to adhere to BSCP 516, something which should be investigated by Elexon. As a result of this stance, on behalf of the impacted customers, Business Energy Direct have raised several cases with Ombudsman Services Energy, one of which has been determined recently. The Proposer's company (Eon Next) have been directed by the Ombudsman to complete the change, in addition to covering all financial detriment as a result of their failure to carry out the required change, with compensation also being awarded. This follows previous outcomes against other suppliers that either refused to or didn't know how to deal with CoMC's and the Ombudsman has been consistent with their determinations. Due to the frequently low industry engagement that Elexon have from suppliers and industry parties, Business Energy Direct have suggested that Elexon reach out to experienced industry parties and consultants, to seek participation in future consultations. The suppliers which have participated to date have a very clear opinion on whether P432 meets the objectives, as does Business Energy Direct and no doubt our peers would share that evidence derived opinion if it was sought. In relation to A total of 9 responses is not sufficient to be making decisions that potentially impact the industry to the tune of £450m per year (if our typical customer represents the average customer in the 50,000 that would be subject to P432). Evidence based decisions need to be made for the industry and this is easier with greater industry participation.
Shell Energy UK Limited	No Comment	None provided

Question 2: Do you agree with the Workgroup that the draft legal text in Attachment A delivers the intention of P432?

Summary

Yes	No	Neutral/No Comment	Other
11	2	1	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	Drafting has been reviewed and updated a number of times, now seems to work. The only aspect that should be made explicit is that any new CT connections which are required to be HH settled from June 2023, and any other CT connections already settling HH, cannot revert to NHH between June 2023 and M11 or M14 The consultation document refers to domestic and micro-business opt-out. This should be clear that the opt-out only allows for opt-out for import consumption. There is no opt-out ability for the export consumption. As a result, any customer with export will require a working advance CT meters and communications, even if the import is no HH settled, it will be estimated on the daily register reads. The BSC legal drafting probably reflects this by referring to the SLC, but participant guidance needs to make this clear. The issues raised in the workgroup about customers obtaining prices is a broader market issue irrespective of P432. The cost differentiation identified is, in part, due to avoidance of essential DUoS charging elements. This is really about 'playing the system' with DUoS charges and a failure of DCUSA & CDCM to close this loophole.
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We believe that the Workgroup draft legal text delivers the intention of P432
Centrica	Yes	None provided
Stark	Yes	We agree that the draft legal text delivers the intention of P432, particularly with addressing the inconsistent definitions of Advanced Meters in the

Respondent	Response	Rationale
		BSC and the Supply Standard Licence Conditions4 (SLC) and addressing the Ofgem send-back requirements.
BUUK	Yes	None provided
Scottish Power	No	As above Q1
SSE	Yes	Whilst we do not agree that the modification should be implemented, if it is then the draft legal text delivers its intention.
Npower/E.on	Yes	None provided
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	No	No – See our response to the original consultation.
Shell Energy UK Limited	No Comment	None provided

Question 3: Do you agree with the Workgroup that the draft Code Subsidiary Documents in Attachment A delivers the intention of P432? Summary

Yes	No	Neutral/No Comment	Other
11	1	2	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	Drafting has been reviewed and updated a number of times, now seems to work. The only aspect that should be made explicit is that any new CT connections which are required to be HH settled from June 2023, and any other CT connections already settling HH, cannot revert to NHH between June 2023 and M11 or M14.
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We believe that the Workgroup draft Code Subsidiary Documents deliver the intention of P432
Centrica	Yes	None provided
Stark	Yes	We agree that the draft CSD specifically BSCP 516 delivers the intention of P432 indicating where this BSCP no longer applies regarding CT meters & amending references to PC 5-8.
BUUK	Yes	None provided
Scottish Power	No	As above Q1
SSE	Yes	None provided
Npower/E.on	Yes	None provided
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	No comment	None provided
Shell Energy UK Limited	No Comment	None provided

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

Summary

Yes	No	Neutral/No Comment	Other
10	3	1	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	Linking to the MHHS timetable has a logic, despite the MHHS timetable slipping
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We agree that more time is needed and are comfortable with the revised Implementation Date.
Centrica	Yes	None provided
Stark	Yes	Whilst we have expressed a preference for the potential of an earlier implementation date, we acknowledge that the revised implementation timeframe for P432 takes appropriate account of the perceived difficulties of some market participants but ensures that CT migration could be completed in sufficient time to allow for the potential benefit created by de-risking the wider MHHS Programme. Both CP1558 and R0032 are targeting an implementation as part of the standard June 2023 BSC Release, which would make this an appropriate date for mandating CT meter installs. This implementation also takes into account the DCUSA modification (DCP414) being raised and being implemented thus ensuring end consumers the opportunity to discuss appropriate capacity charging prior to or when migrated to HH. This was viewed to not be relevant to new installs, however existing CT meters would be able to start migration with the implementation lead time of 3 months.
BUUK	Yes	None provided
Scottish Power	No	As above Q1

Respondent	Response	Rationale
SSE	No	We do not agree that this modification should not be implemented outside of the MHHS Programme.
Npower/E.on	Yes	We agree with the proposed implementation date and approach. The proposed implementation date and approach has been recommended on the basis that CT metering systems will need to move to HH settlement using the existing CoMC process and to allow for time to resolve issues which may arise prior to the MHHS TOM go live and migration, however by pinning the completion date to the M14 milestone this may also present an opportunity for suppliers to consider avoiding the use of CoMC and instead migrate NHH CT customers into the MHHS TOM over the period between the M11 & M14 milestones by becoming early adaptors of the MHHS TOM. In short this gives suppliers a choice on approaches for the transition of NHH CT customers to HH settlement.
TMA	Yes	None provided
NGED	No comment	It was not clear from the send back process documents what the decision has been made in respect of the implementation for this modification.
Business Energy Direct	No	No – Any implementation should be aligned to MHHS implementation
Shell Energy UK Limited	Yes	None provided

Question 5: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P432 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
11	2	1	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	None provided
Market Wide Half Hourly Settlement Programme	No	Please see our answers to Q12 &Q13
Northern Powergrid	Yes	We agree with the Workgroup position.
Centrica	Yes	None provided
Stark	Yes	None provided
BUUK	Yes	None provided
Scottish Power	Yes	However, we believe that implementation should be aligned to the MHHS plan and milestones that are currently still out for consultation.
SSE	No	Whilst we do not have any other potential modification per se, our view is that making the changes within P432 part of the MHHS Programme would be more efficient.
Npower/E.on	Yes	None provided
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	Yes	From our previous consultation response. - However, given that the logical approach as stated by Elexon, would be to consider the capabilities of a supply rather than meter type, then if P432 gains approval, with CT meters becoming settled Half-Hourly, then applying the same logic must result in all Whole Current metered supplies, being but

Respondent	Response	Rationale
		through the Change of Measurement Class process so that they can be settled on a NHH basis (unless a customer elects to remain HH settled
Shell Energy UK Limited	No Comment	None provided

Question 6: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
11	0	3	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	Should improve rather than reduce settlement accuracy
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We agree with the assessment of the impact on the BSC Settlement Risks by the Workgroup
Centrica	Yes	None provided
Stark	Yes	Agree with BSC Settlement Risks
BUUK	Yes	None provided
Scottish Power	No comment	None provided
SSE	Yes	None provided
Npower/E.on	Yes	Agree with BSC Settlement Risks
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	No comment	None provided
Shell Energy UK Limited	No Comment	None provided

Question 7: Do you agree with the Workgroup's assessment 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
11	0	3	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	No comment	Do not understand EBGL
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	Yes	We agree with the Workgroup position.
Centrica	Yes	None provided
Stark	Yes	None provided
BUUK	Yes	None provided
Scottish Power	Yes	None provided
SSE	Yes	None provided
Npower/E.on	Yes	Agree that P432 does not impact on the EBGL
TMA	Yes	None provided
National Grid Electricity Distribution	Yes	None provided
Business Energy Direct	No comment	None provided
Shell Energy UK Limited	No Comment	None provided

Question 8: Will P432 impact your organisation?

Summary

High	Medium	Low	None/No Comment
1	4	8	1

Responses

Respondent	Response	Rationale
IMServ Europe	Low	None provided
Power Data Associates Ltd	Low	Although the principle has a cross over with P434 which does impact us. By not implementing P432 there is a risk of extending the MHHS timetable and the migration timetable, which will have a detrimental impact on all participants.
Market Wide Half Hourly Settlement Programme	Low	Our current approach to migration assumes P432 has been approved. If P432 is not approved, then the risk is that the migration will take longer, as suppliers fail to migrate by the end of migration and risk non-compliance.
Northern Powergrid	Medium	P432 will require LDSOs to agree an appropriate capacity with the impacted customers. This was a significant undertaking as part of P272 (etc), given we do not have contact information for the impacted customers or site-specific information on which to determine what we consider to be an appropriate capacity for them. We continue to believe using a default capacity is not appropriate therefore will rely upon Suppliers supporting this effort. The DCUSA change being raised should take into account any learnings from DCP179 and DCP248 which were raised as part of the P272 process.
Centrica	Low	P432 will impact our new connection process for CT metered connections
Stark	Medium/Low	The impact to our business would be related to the requirements for elective CoMC processes; apart from the BSC process post P272 there are guidelines that include planning with Supplier and MoA's, but also the commercial actions required to review Customer contracts.
BUUK	Low	Due to a very limited number of MPANs which will be affected by this change, we consider the impact upon our organisation to be very minimal.

Respondent	Response	Rationale
SSE	Low	We would expect his to have a low level of impact if aligned to MHHS M14 as it will be done as part of our MHHS Project.
Npower/E.on	Medium	We currently supply approximately 7.5K NHH CT meters across our respective supply portfolio's, given the numbers we are considering system development to automate CoMC processes to facilitate movement from NHH-HH. We also expect that we will need to develop customer communications, customer journey and upskilling of internal resource on the relevant processes that set out the impacts that customers will need to undertake to mitigate some of the changes to cost items customers are likely to see in bills and future contracts.
TMA	Low	Implementation will see growth in MPAN numbers but this can be managed with little or no change.
National Grid Electricity Distribution	High	National Grid Electricity Distribution will have 15,000 new HH customers that will require connection agreements.
Business Energy Direct	Medium	Yes our previous consultation response
Shell Energy UK Limited	No Comment	None provided
SMS	Low	As an accredited NHH/HH MEM no/limited system changes will be required. Work has already started on CT Advanced meter analysis to confirm comms reliability and customer portfolio. Further discussion with Elexon and other Parties will be required regarding the CoMC process; with the removal of the WPs (WP66) on transfer from MRASCo to RECCo, agreement or guidance on processing CoMCs on mass will be sought.

Question 9: How much will it cost your organisation to implement P432?

Summary

High	Medium	Low	None/No Comment
1	2	5	5

Responses

Respondent	Response	Rationale
IMServ Europe	Low	None provided
Power Data Associates Ltd	None	No direct cost
Market Wide Half Hourly Settlement Programme	No comment	None provided
Northern Powergrid	Medium 30K – 100K	The immediate costs for software development are approximately £30,000 with additional implementation costs would be ~£30,000 - £100,000 depending on additional required hardware. We do not envisage an increase in ongoing costs at present.
Centrica	No comment	None provided
Stark	None	P432 would not require any system changes.
BUUK	Low	As above, due to the limited impact on our organisation, we believe any implementation costs to be negligible.
SSE	Low	We would expect this to have a low level of cost if aligned to MHHS M14 as it will be done as part of our MHHS Project.
Npower/E.on	Medium	We believe there will be costs related to items outlined under Q8, however the costs are not yet known.
TMA	Low	May be some small costs
National Grid Electricity Distribution	High	Costs will be incurred in the resource to obtain and analyse the data prior to notification to Customers of the MIC via a mail merge and creating all 15,000 Connection Agreements within our internal systems. This is a significant amount of resource and we have calculated this to be in the region of 280 hours.

Respondent	Response	Rationale
Business Energy Direct	Low £500-£1000	None provided
Shell Energy UK Limited	No Comment	None provided

Question 10: What will the ongoing cost of P432 be to your organisation?

Summary

High	Medium	Low	None/No Comment
0	0	7	6

Responses

Respondent	Response	Rationale
IMServ Europe	Low	None provided
Power Data Associates Ltd	None	No direct cost
Market Wide Half Hourly Settlement Programme	No comment	None provided
Northern Powergrid	None	We do not anticipate additional costs
Centrica	No comment	None provided
Stark	Low	Normal costs related to the implementation of a BSC release.
BUUK	Low	We believe any ongoing costs to our business to be negligible in line with the above.
SSE	Low	We would expect this to have a low level of ongoing costs if aligned to MHHS M14 as the new processes required for it would be delivered as part of our changes for MHHS go live.
Npower/E.on	Low	As we already supply HH CT customers in the traditional market we do not believe P432 will incur any significant ongoing costs over and above resolving exceptions post CoMC to HH.
TMA	Low	May be some small ongoing costs
National Grid Electricity Distribution	No comment	None provided
Business Energy Direct	Low	We are not able to quantify the cost presently. As stated in previous questions, the additional time burden will depend on how many of our customers are impacted (a very low number presently) and

Respondent	Response	Rationale
		what actions are taken by suppliers following an approval of P432.
Shell Energy UK Limited	No Comment	None provided

Question 11: Do you agree a three month lead time is sufficient to settle new connections for CT Advanced Meters HH?

Summary

Yes	No	Neutral/No Comment	Other
9	2	3	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	None provided
Power Data Associates Ltd	Yes	All new CT installations will be having HH capable meter fitted and are already under an obligation in the SLC to make that an Advance Meter so meter and comms should already be able installed and therefore should immediately settle HH. Once P432 is finally settled the hope is that Suppliers will move CT sites to be settled HH as soon as possible to minimise the delay and to reveal the CT customers who are problematically so that there is time to resolve the small number of customers which will have difficulty.
Market Wide Half Hourly Settlement Programme	Yes	None provided
Northern Powergrid	No comment	We are unable to provide a response to this question due to insufficient detail on the subject at present.
Centrica	Yes	We agree that 3 months lead time is sufficient notice to settle new connections for CT Advanced Meters HH
Stark	Yes	Registration requirements should have been implemented.
BUUK	Yes	None provided
Scottish Power	No	As above Q1
SSE	No	We believe that suppliers should be able to choose whether new connections are settled HH or NHH (as they currently can) and that if NHH is chosen then they need to be migrated to HH by MHHS M14. This means that any new connections prior to M14 can be HH or NHH, but by M14 must be HH.

Respondent	Response	Rationale
Npower/E.on	Yes	We believe a 3 month lead time provides sufficient notice.
TMA	Yes	None provided
National Grid Electricity Distribution	No comment	None provided
Business Energy Direct	Yes	None provided
Shell Energy UK Limited	No Comment	None provided

Question 12: Do you agree with the P432 Workgroup that the CoMC migration completion date for CT Advanced Meters should be pinned to M14 and not M11?

Summary

Yes	No	Neutral/No Comment	Other
7	4	4	0

Responses

Respondent	Response	Rationale
IMServ Europe	No	The quoted primary benefit of this Modification is to "mitigate the risk of not meeting the MHHS Transition Timetable by moving NHH CT Advanced Meters to HH via CoMC earlier, as these have the potential to have a disproportionate number of issues". Therefore to delay the completion date until M14 undermines this objective. Also, should some Suppliers be ready and commence migration to MHHS (i.e. M11), you effectively would have 2 migrations taking place at the same time, sites moving from NHH to HH and sites moving from existing arrangements to MHHS. If the migration from NHH to HH had already been completed, this would not be the case. I would think it would be very undesirable to have both happening concurrently. Agreement has yet to be reached within the MHHS Programme as to whether it needs to support reverse migration from the MHHS TOM back to the existing arrangements. Further the scope of such reversal has yet to be agreed, with some discussion on limiting this to only the SDS rather than all Services taking place. Therefore it seems premature to consider how this proposal should be tied to M14.
Power Data Associates Ltd	No	I can see the rational for linking the P432 dates to MHHS dates as the MHHS timetable is sadly slipping backwards. Yet as Ofgem's letter to the industry last week has made clear Ofgem are keen to gain the benefits of MHHS as early as possible. The CCDG recommendation to progress with P432 was seeking to support the smooth transition to MHHS and gain the benefit of HH settlement from this group of larger consuming customers as soon as possible.

Respondent	Response	Rationale
		I do not support reverting to M14. The CCDG intention was to complete all CT settling HH 12 months ahead of the migration commencing. This allows time to resolve any CT 'stragglers' and to for participants to address the whole current Advanced meters. The only aspect that should be made explicit is that any new CT connections which are required to be HH settled from June 2023, and any other CT connections already settling HH, cannot revert to NHH between June 2023 and M11 or M14
Market Wide Half Hourly Settlement Programme	No	The MHHS Programme provided an initial acceptance of the workgroup's position that adopting a target date pinned to M14 would address Supplier concerns about having to manage two migrations and two sets of system changes (one for P432, one for MHHS) and allow Suppliers to migrate straight to the TOM with new systems if they preferred. On further consideration, we think this introduces unwanted ambiguity and uncertainty between M11 and M14 as to which arrangements are actually in effect. The possibility of a 'two way' gate to allow for Change of Supplier activity further complicates this. Our initial assumption is that P432 Metering Systems would not be in scope for reverse migration to NHH as any Supplier of CT Metered Customers should have the capability to bill and manage those customers once settled HH. The only consideration should be if they can revert back to traditional HHDC/HHDA arrangements, which would still add complexity but not fundamentally change the way the customer is billed. In conclusion, the MHHS Programme would be more comfortable with an explicit P432 CoMC migration completion date pinned to M11. We recognise that some customers will not be able to be moved HH via CoMC due to data access restrictions, in which case we think it better to exclude these Metering Systems from the scope of P432 and require all remaining Metering Systems (the majority of those in scope) to be migrated by M11, and leave only SLC47 opt out customers for direct migration at M14.
Northern Powergrid	No comment	We are unable to provide a response to this question due to insufficient detail on the subject at present.

Respondent	Response	Rationale
Centrica	Yes	We agree that the completion date for CT Advanced Meters should be pinned to M14. This will enable Suppliers to migrate CT Advanced Meters directly to the TOM and avoid duplication of cost and effort.
Stark	Yes	Initially our preference, it was suggested the end date could be pinned to the M11 milestone in keeping with the CCDG recommendation. Considering the rationale discussed we agree with using the M14 milestone as an endpoint for P432 i.e., when all Suppliers must accept MSIDs under the new TOM, would be more appropriate as a target end-date. M11 will be the start of migration, currently an early adoption window with potential for reversal, although this has yet to be finalised, with programme migration framework decisions yet to be finalised. The M14 compliance date is the date by which the last CoMC needs to be completed for all currently NHH settled CT Metering Systems; even if only some of the CT Advanced Meters are moved by the mandated dates it will still help the migration to MHHS TOM. Using M14 would also, have the advantage of, as discussed, possibly addressing some Supplier concerns of potentially having to manage two migrations and two sets of system changes (one for P432 and one for MHHS).
BUUK	No comment	Due to limited organisational impact, we do not feel able to make a judgement as these timelines would not disproportionately affect us, whereas other parties may experience greater consequences and it is for them to comment on this.
Scottish Power	Yes	However, to the new M14 milestone stone that is currently under re-plan consultation and proposed to be the end of March 2026 and not the Oct 2025 date in the consultation.
SSE	Yes	We agree that this date should be pinned to M14 and not M11 as it will not require changes to be done in the 'old world' before being transferred to the 'new world' of MHHS. Pinning it to M14 will mean that suppliers can make the change only once when migrating the impacted sites into the 'new world' of MHHS.

Respondent	Response	Rationale
Npower/E.on	Yes	Please see response to Q4.
TMA	No	M14 brings in the risk from moving these sites back into the MHHS migration, whereas if done before M11 all sites will be moved prior to MHHS migration starting.
National Grid Electricity Distribution	No comment	None provided
Business Energy Direct	Yes	None provided
Shell Energy UK Limited	Yes	None provided
SMS PLC	No comment	What would be put in place to prevent all suppliers from delaying the CoMC activity so that it only occurs during the M11 1 year period, alongside the main Migration into MHHS and therefore make the benefits of this change null and void? We can see the concerns regarding backwards CoMCs and managing two migrations, but surely managing the issue of backwards CoMCs (i.e. not allowing it) would solve that concern?

Question 13: Please provide any risks, issues and advantages and disadvantages for requiring CT Advanced Meters to migrate to HH by M11 versus M14.

Responses

Respondent	Response
IMServ	See above
Power Data Associates Ltd	The CCDG rational for setting an earlier deadline was that CT Advanced meters must settle HH under MHHS so sorting them early was without regrets. This then provided a window for participants to move the whole current Advanced meters to HH prior to migration. Whole current advanced meters could change to a smart meter prior to M11/M14 so the mandate for forcibly moving these was not as strong as CT.
Market Wide Half Hourly Settlement Programme	As per our response to Question 12, we feel that a compliance date of M14 is too close to migration and runs the risk of whole Supplier CT portfolios being delayed until the period between M11 and M14, which runs counter to the original intent of P432. We recognise that 100% compliance with P432 cannot be achieved by M11 for those Suppliers with domestic or micro-business customers. But we would prefer that it is only these Metering Systems that are considered for direct migration to MHHS, which has the necessary processes to be able to be able to settle these customers using register readings. The additional compliance period between M11 and M14 should be a 'mop up' window for residual NHH settled Metering Systems, not for entire portfolios. As far as the issue of two sets of system changes, M11 should be more than sufficient to align these as the design baseline will be known well in advance. Regardless of the compliance date chosen for P432, some parallel processes will be inevitable should a 'two way gate' reverse migration option be considered. We do not believe that the delta between M11 and M14 would be that fundamental to Suppliers' DBT activities.
Northern Powergrid	We are unable to provide a response to this question due to insufficient detail on the subject at present.
Centrica	By setting the migration end date to M14 Suppliers can migrate CT Advanced Meters directly to the TOM and avoid duplication of cost and effort.
Stark	An identified risk revolves around the ability to conduct a reverse CoMC or CoS if CT migration pinned to M11, rather than M14 as an end-date.
BUUK	Please see above response.

Respondent	Response
Scottish Power	None provided
SSE	Requiring them to be migrated by M11 is likely to mean increased costs for suppliers as they would have to migrate the meters twice - once in the 'old world' before migrating them again to the 'new world'. This could lead to a risk to the delivery of suppliers' MHHS Projects due to the extra work required.
Npower/E.on	We believe M14 is the most suitable point for P432 to take full effect because it has the advantage of addressing Supplier concerns of having to manage two migrations and two sets of system changes, essentially it offers an incentive for suppliers to consider becoming early MHHS TOM adaptors and potentially not have to adopt CoMC for NHH CT customers.
TMA	Migrating all before M11 takes the migration risk out of the MHHS programme
National Grid Electricity Distribution	No comment
Business Energy Direct	None provided
Shell Energy UK Limited	None provided
SMS PLC	M11 allows for the works to be completed before migration into the TOM and follows the recommendation of the CCDG, separating the CoMC period from the Migration period is the action required to de-risk the number of supplies going through in one go. M14 though this is the date that all suppliers must accept MPANs under the TOM, it would leave those suppliers 9 months to move their portfolio by M15 – in itself, this carries a large risk. M14 enables suppliers to migrate directly into the new TOM if they wish & manage a 'single' migration.

Question 14: Do you have any suggestions how the wider issues for CT Advanced Meters could be solved?

Summary

Yes	No	Neutral/No Comment	Other
2	6	4	1

Responses

Respondent	Response	Rationale
IMServ Europe	No	None provided
Power Data Associates Ltd	Other	What 'issues'? I have responded to many scenarios in many forums. Many of these issues were captured in the document I prepared for the AMO. If the 'issues' include the allocation and agreement of Agreed Supply Capacities then this administrative process is exactly why P432 should be progressed as it requires participants and customers to agree information which will take time and if delayed will result in a greater peak of activity during MHHS migration which may result in poor customer experience and delay completion of migration. REC R0015 was raised to compliment P432 and ensure comms were installed and maintained as operating. Communications are required even if the customer is able and does 'opt out' because the estimation requires a daily midnight read.
Market Wide Half Hourly Settlement Programme	No	None provided
Northern Powergrid	No comment	We are unable to provide a response to this question due to insufficient detail on the subject at present.
Centrica	No comment	None provided
Stark	No	No additional suggestions however we do not consider increased cost for more frequent manual site retrieved readings should be an issue, as the meters would require working comms (under SLC) and any faults significant enough to require site visits from P432 should not impact business as usual costs enough to warrant a solution.
BUUK	No comment	Please see above response.
Scottish Power	No	None provided

Respondent	Response	Rationale
SSE	Yes	The wider issues for CT Advanced Meters should be brought under the umbrella of the MHHS Programme. Whilst we agree with the necessary changes in P432, we do not agree with the changes being progressed outside of the Programme. We have previously responded in earlier consultations stating that the timescales of P432 did not line up with the (still unknown) timelines of the MHHS Programme and that the changes proposed under P432 should be done as part of the Programme. P432 only covers sites with working AMR meters and communications. This means that the CT sites with the biggest issues to resolve would still be left to the end of the MHHS Programme, as these are the sites that require meter changes or have communications issues. This unfairly penalises customers who have engaged sufficiently to have an AMR meter fitted, as they will end up attracting capacity charges and higher HH charges earlier than customers who have not engaged or refused a meter exchange. Bringing P432 under the MHHS Programme would allow its scope to be expanded, and so could enable the wider issues for CT advanced meters to be resolved as one piece of work, rather than the issues being addressed in a piecemeal fashion with some being done outside of the Programme under P432.
Npower/E.on	Yes	We have provided information to help inform the issue of existing NHH CT customers having low capacity requirement that would otherwise not warrant a physical CT connection, however for clarity we do remain of the view it is not in the scope of P432 to remedy this. It is our understanding that the issue of charging based on connection type was originally derived within the set of TCR charges in so far as all non-domestic residual charges are to be allocated based on connection type. in addition, the MHHS FBC published in April 2021 also set out an implementation period of 4 years & 6 months which would have led to MHHS migration completing by October 2026 on original timelines. The residual banding percentile allocations (i.e. 40% of customers in LVCT=percentile 1 band allocation) are reviewed ahead of each onshore electricity transmission owner price control period with the next period taking effect from April 2026 and every 5 years thereafter. This means that

Respondent	Response	Rationale
		currently any movement of NHH CT customers to HH settlement will not be captured in the price control review so will see these sites move into charging bands largley based on existing HH CT+ percentile allocations,as the data used to inform the 2026 price control will not capture NHH CT's moving into hH settlement & that will remain the case until at least the 2031 onshore electricity transmission owner price control. As such there is a clear cost signal that sets out an economic case to physically change NHH CT connections with low demand to WC connection types, which is particularly strong for low demand consumers and the strength of that cost signal will not reduce until such a time that the 50K NHH CT customers are accounted for in the onshore electricity transmission owner price control review. it is our belief that because of the TCR SCR and MHHS implementation timelines as set out by Ofgem not being aligned to the 2026 onshore price control acts to prevent NHH CT sites to be captured within correct connection type for a prolonged period, in turn this will likely lead to a strong cost signal that incentivises consumers to physically change their connection type from CT to WC in order to reduce the ongoing impact that is currently perceived in site specific network charges. At this stage it is not clear if the cost signal requires addressing to prevent CT to WC connection type changes, however it is ultimately the network charging arrangements (both TNUoS & DUoS) generating the cost signal with the CoMC movement to site specific DUoS charging being the trigger. Therefore we feel this needs specific consideration with network companies to consider if it is an issue and if so seek an appropriate form of re-dress through additional industry change mechanisms.
TMA	No	None provided
National Grid Electricity Distribution	No comment	None provided
Business Energy Direct	No	None provided
Shell Energy UK Limited	No Comment	None provided

Question 15: Do you have any further comments on P432?

Responses

Respondent	Response
IMServ	None
Power Data Associates Ltd	It needs agreeing quickly to enable the MHHS migration planning to be developed with greater confidence.
Market Wide Half Hourly Settlement Programme	None
Northern Powergrid	None
Centrica	The legal drafting mentions "new connections" although this is not a defined term. Our view is that "new connection" means the initial registration and would not for example include where sites already have an MPAN allocated and have been previously registered but no meter present.
Stark	None
BUUK	None
Scottish Power	There is still an issue with global supply chains there is still a shortage of CT meters available in the marketplace resulting in many customers not having the appropriate meter installed to provide HH data. In addition, there is still customers who do not respond to the attempts to install the meter and subsequently do not have the required metering installed.
SSE	Following on from our response to Q14, where we state that P432 changes should be done under the MHHS Programme, aligning P432 to M14 strengthens the case for this as the requirements could be formally made part of the M14 milestone under the MHHS Programme. This would mean that the requirements of P432 could be subject to MHHS readiness plans, governance, etc., under the Programme. It would also mean that the requirements would have the same audience and be subject to the same criteria and discussions regarding any changes to them as other elements of the MHHS Programme. All work and analysis done under P432 could move over to the Programme, and to keep P432 as a BSC change looks as if 'a part of the MHHS Programme has been randomly selected to be progressed outside of it under a separate BSC Modification'. Any further consultation questions should ask 'whether parties expect to progress the changes for the P432 requirements outside of their internal MHHS project', in order to validate this viewpoint.
Npower/E.on	No

Respondent	Response
TMA	None
Shell Energy UK Limited	None