

P280 Consultation Responses

Consultation issued on 15 June 2012

We received responses from the following Parties

Company	No BSC Parties/Non-Parties Represented	Role of Parties/non-Parties represented
Electricity North West	1/0	Distributor
Western Power Distribution plc	4/0	Distributor
Northern Powergrid	2/0	Distributor
ScottishPower	3/1	Supplier/Distributor/Party Agent
IMServ Europe Ltd	0/6	NHHDC/NHHDA/MOP
ENC	1/0	Distributor
RWE npower	9/0	Supplier, Party Agent
SSE	6/0	Supplier/Generator/Trader/Party Agent/Distributor
EDF Energy	10/0	Supplier/Party Agent/Consolidator/Generator/Exemptable Generator/Trader
Paul Scafton	0/1	Independent IS Consultant

What stage is this document in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree with the Panel's initial recommendation that P280 should be approved?

Summary

Yes	No	No response
7	2	1

Responses

Respondent	Response	Rationale
Electricity North West	Yes	As the Proposer we fully support this modification.
Western Power Distribution plc	Yes	-
Northern Powergrid	Yes	P280 would ensure a process is in place to bill sub 100kW HH Settled customers on an aggregated basis rather than site specific basis in order to reduce the impact across all industry parties.
ScottishPower	Yes	<p>We believe that the proposal P280 better facilitates Objectives (c) and (d) compared with the current Code Provisions.</p> <p>Under Objective (c) we believe that the extended use of HH data will give Suppliers an option as to whether they wish to enter the HH market, thereby making this segment of the market more competitive.</p> <p>Under Objective (d) we believe that increased HH data will increase the accuracy of settlements, thereby promoting more efficiency within the current arrangements.</p>
IMServ Europe Ltd	Yes	<p>We agree with the view of the Workgroup that the principle of enabling the use of aggregated HH data for Duos billing for sites below 100kW better facilitates BSC Objective C and D.</p> <p>Objective C – makes the process of handling increased volumes of data more efficient and facilitates other changes intended to create opportunities for better tariff structures thereby promoting effective competition.</p> <p>Objective D - We believe that this change helps to facilitate existing work being conducted in this area to improve efficiency in costs and processes. This change provides a means of managing what would be very large volumes of data efficiently should the volume of sites settled Half Hourly expand significantly.</p>

Respondent	Response	Rationale
ENC	No	As an IDNO we have a total of 999 LLFCs available for all 14 GSP groups this gives us an allocation of 72 LLFC's per GSP group. There is not sufficient headroom to facilitate this number of LLFCs on an enduring basis. If this solution is to be implemented we would expect Elexon to advise us on how we can facilitate this change with a limited number of LLFC's available.
RWE npower	Yes	We agree with the Panel's initial recommendation as, whilst aggregated billing may be preferential as an efficient and cost effective mechanism, it does give Suppliers an option enabling them to move customers to elective HH (MC 'E) status and receive site specific bills.
SSE	Yes	Our yes is conditional on the DNO charging methodology being amended to be more cost reflective as proposed under DCUSA. We understand that following the NHH/HH MIG meeting on July 5th DCP 103 is likely to be withdrawn and a replacement DCP raised to be more reflective of P280.
EDF Energy	No	<p>The costs to distribution companies of Distribution Use of System (DUoS) billing processes, and the handling of DUoS bills by distribution users, are outside the scope of the BSC. The benefits of the proposal lie with distribution companies and some distribution users in the form of avoided handling costs under the distribution charging arrangements, not under the BSC. However, there are implementation costs for BSC Parties and Party Agents, collectively and individually, and implementation and ongoing costs even for those that do not use the proposed functionality. Therefore BSC objectives cannot be better met.</p> <p>Considering the individual BSC Objectives:</p> <ul style="list-style-type: none"> • More half-hourly settlement should, provided net benefits outweigh costs, better meet BSC Objective (b) concerning efficient system operation, by facilitating passive and active response to time-of-use price signals. However, it has not been demonstrated that P280 is a necessary part of the most cost-effective long term approach to facilitate increased half-hourly settlement, and P280 itself does not change the time-of-use price signals. • More half-hourly settlement should, provided net benefits outweigh costs, better meet BSC Objective (c) concerning competition, by facilitating more accurate allocation of time-of-use volumes and hence costs to competing parties and ultimately to

Respondent	Response	Rationale
		<p>individual consumers. A more accurate allocation of costs should avoid cross-subsidy between suppliers and ultimately individual customers, thus promoting competition. However, it has not been demonstrated that P280 is a necessary part of the most cost-effective long term approach to facilitate increased half-hourly settlement, and P280 could create costs for parties that do not use the new Measurement Classes.</p> <ul style="list-style-type: none"> Implementation of the proposal would require significant expenditure by suppliers and agents, and some costs for those that do not intend to use the proposed functionality. Limiting increases in HH DUoS data volumes for HH DUoS might reduce expenditure on distribution billing by DNOs and some suppliers, but this is not a benefit for BSC settlement. Therefore no benefit for BSC settlement exists, and there cannot be a benefit against BSC Objective (d). We are not aware of any impact under BSC Objectives (a) or (e). <p>The defect in the BSC is claimed to be that it doesn't provide a mechanism for distinguishing HH-settled customers whose network charges should be calculated on a site-specific basis from those whose network charges should be calculated on an aggregated basis. However, there is no requirement for such a distinction currently and the request for, and the benefit of, such a distinction lies outside the BSC arrangements.</p> <p>Assessment of the costs and benefits of the proposal is not sufficiently detailed to determine whether the proposal would provide a net benefit against wider objectives that the Authority might consider. Specifically:</p> <ul style="list-style-type: none"> the costs that Distribution Companies and Users might incur if the proposal were not implemented, and The costs for Distribution Companies and BSC Parties to implement the proposal, including costs for those Suppliers and Agents that might expect not to use the functionality, <p>in each case estimated taking into consideration:</p> <ul style="list-style-type: none"> different scenarios of increased take-up of half-hourly settlement, noting that different parties have different thresholds at which significant upgrade/replacement costs are likely to be incurred, and therefore have different individual costs and

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		<p>benefits;</p> <ul style="list-style-type: none"> • different scenarios of take-up by Suppliers of the proposed new Measurement Classes; • timescales for more fundamental significant changes to industry systems as smart metering and DCC functionality lead to completely new industry approaches to data processing, which might render the proposed change redundant. <p>If P280 is implemented but some or all Suppliers choose not to use the voluntary new Measurement Classes for HH meters, distribution companies (DNOs) would be required to accommodate increased numbers of site-specific HH data anyway. In that case, costs would be incurred by Distributors, Suppliers, Party Agents, SVAA and BSCCo through implementation of P280 and by DNOs required to accommodate increases in site-specific DUoS billing.</p> <p>In a scenario of increased take-up of HH settlement, Suppliers would have to increase the capacity of their systems anyway to accommodate settlement validation and billing, regardless of DUoS, so the incremental benefit of this proposal for them should be much less.</p> <p>Although outside the scope of the BSC, we are uncertain how possible future tariff distinctions between the new measurement classes, as suggested in the draft report, should be considered in any cost-benefit analysis. Such distinctions could create further discrimination in DUoS charges according to HH Measurement Class, even though current effort is aimed at reducing discrimination between NHH and HH Measurement Classes.</p> <p>Further Comments</p> <p>The main potential benefit appears to lie in avoided DUoS billing development costs for a possible scenario of high take-up of HH settlement for smart meters. If this scenario does not occur quickly, or alternative approaches are developed as wider changes to industry settlement and billing are developed with smart metering and the DCC, expenditure now will have been wasted. We see no reason currently to implement this with the urgency that has been suggested.</p> <p>At first sight, provision of half-hourly data aggregated using BSC processes appears a pragmatic way to reduce DUoS billing costs. Extending this to include 3 new classifications of SVA customer sites with sub-aggregation by Line Loss Factor Class appears a pragmatic way to accommodate current and possible</p>

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		<p>future DUoS charging rates for HH meters.</p> <p>However, we think the proposal represents an expensive temporary workaround, diverting resources from the much wider changes that will be necessary to achieve the full benefits of smart metering with the future DataCommsCo, "smart grids" and "smarter markets".</p> <p>We think more evidence of the likely take-up of half-hourly settlement is required. If P272 were to be approved, there would be a relatively modest increase in the number of sites settled half-hourly, which we think participants should be able to handle by modest increases in existing capacity where necessary.</p> <p>Take-up of half-hourly settlement so far has been low, despite significant numbers of half-hourly capable advanced and pre-smart meters having been installed. If the take-up of half-hourly settlement remains low for several years, much of the cost and effort that might be expended on P280, if it is approved, would have been wasted. We think significant take-up of half-hourly settlement is more likely once smart meter rollout is well underway and participants have confidence in the new end-to-end processes, including half-hourly data retrieval and processing from an initially limited number of smart meters. We think many new classifications of customers could be desirable in future, for various purposes, in order to achieve the full benefits from smart and AMR metering. Registration, data collection, data aggregation and settlement itself could change fundamentally once the initial phases of smart metering rollout and DCC operation have been completed.</p> <p>If some participants require aggregated DUoS billing to accommodate separate proposal P272 'Mandatory Half-Hourly Settlement for Profile Classes 5-8', then P280 should be considered for implementation in parallel with, and conditional upon, P272. It should be noted that those participants requiring P280 for this purpose would, if P280 is approved, impose costs on those participants such as EDF Energy who do not require it to accommodate P272.</p> <p>The full impact of the proposal on parties not requiring or wishing to use the new functionality have not been properly considered. Those parties may need to change their systems and processes to handle the new MDD data and identify the new Measurement Classes in order to undertake the Change of Measurement Class process. They might also need to change their systems to handle exceptions if for any reason the new</p>

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		<p>aggregated dataflow items are received unexpectedly, from HHDA's under the BSC, or from DNOs for DUoS.</p> <p>EDF Energy would incur considerable costs, measured in £millions, to modify all its systems to use the new Measurement Classes for significant numbers of sites (significantly beyond those currently in PC5-8), and would not be able to achieve this by the proposed implementation date of October 2013.</p> <p>The provider of one of our IT systems has indicated that the implementation time for changes to accommodate and use P280 could be as long as 18 months. We know this system is shared with several other suppliers.</p> <p>We do not anticipate any requirement to use the new Measurement Classes, at least for the foreseeable future until the number of new HH settled sites increases considerably beyond the number currently in Profile Classes 5-8.</p> <p>However, we anticipate costs and risks in handling Change of Measurement Class for sites acquired from other suppliers.</p> <p>The claimed benefit of P280 is that in facilitating aggregate DUoS billing for HH sites, it would allow parties to avoid the costs of site-specific billing for increased numbers of HH sites. However, the likely take-up over time of HH settlement has not been considered. For a scenario in which significant numbers of Smart meters are settled half-hourly, major changes to all parties' systems and processes would be required. DUoS arrangements would be only a small part of the changes required. We think HH data processing for smart metering should be considered "in the whole" as part of wider future developments, including DUoS charging and billing issues. Many processes are different for HH settled sites, and focussing just on DUoS charging and billing distracts from more significant changes that will be required to accommodate wider use of HH settlement with smart metering. In the long term, the Smart DCC might be expected to provide centralised data collection and aggregation services to all interested parties. We think effort should be concentrated on this long term approach, and workarounds such as P280 simply divert limited resource from this.</p> <p>P280 would also facilitate differentiated DUoS charges in future for the different Measurement Classes. However, this could have significant impact on Supplier processes, and between customers that are otherwise</p>

Respondent	Response	Rationale
		<p>similar, which would require separate assessment and should not be considered part of the potential benefit for this proposal.</p> <p>Many responses to assessment consultation indicated major cost and significant timescales to implement P280. Some responses indicated that the original implementation timescales could not be met, even though the respondent supported the proposal.</p> <p>Some consultation responses hint that there is not a common understanding of the surprisingly complex detail of this proposal.</p> <p>From assessment and responses, it is hard to tell whether P280 "must" be implemented to support P272, because some distributors and suppliers say they can't handle the DUoS numbers in PC5-8, or whether P280 is needed to handle a much larger increase in HH within PC1-4.</p> <p>If it's the former, we think it could be less costly for those with capacity limitations to increase their capacity. If it's a much larger increase within current PC1-4, we think there are much bigger issues to be addressed, and P280 would be an expensive diversion.</p> <p>There is uncertainty whether and when P272 will be approved. P272 would create a firm requirement for increased HH capability, and would also require changes to parties systems and processes. Although we see no need for P280 in order to handle the number of sites that P272 would cover, if P280 were to be approved it would be sensible from a system development perspective for it to be implemented in conjunction with P272, perhaps 3 months earlier to facilitate HH take-up in the lead-up to P272 coming into force.</p> <p>We think it is inappropriate to progress this solution in isolation from other considerations regarding Smart settlements. Industry change should be accomplished through an all encompassing approach to settlements design under Smart rather than a partial solution that may have unintended consequences.</p>
Paul Scrafton	Yes/No	-

Question 2: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	No response
5	4	1

Responses

Respondent	Response	Rationale
Electricity North West	Yes	This is a facilitation Modification and as such is not aligned to any other industry change proposal. The date suggested allows for twelve months implementation timetable from Authority determination. It is our intent to raise the necessary changes to other codes so that such an implementation date can equally be achieved by them.
Western Power Distribution plc	Yes	-
Northern Powergrid	No	Following a further review of P280 and taking into account resource and time constraints associated with other potential developments we would prefer an implementation date of April 2014.
ScottishPower	No	ScottishPower's preference would be to suggest an implementation date of 1st April 2014. The October implementation date may cause resource issues as we work on midyear price changes and also our service providers are busy working on Green Deal and other mandated industry changes. The 1st April date would be the start of the new Regulatory year and would ensure that all tariffs and P280 changes are implemented at the same time. In addition Scottish Power is undergoing the implementation of a SAP system throughout 2013 which covers the majority of our systems and processes, which would make the implementation of this change extremely difficult before April 2014.
IMServ Europe Ltd	Yes	We are able to make the (for us) mandatory changes by the due date in order to cater for any Supplier wishing to use the new Measurement Classes from the implementation date.
ENC	Yes	-
RWE npower	Yes	As the solution is 'optional' for Suppliers, we have no major objections to the recommended Implementation

Respondent	Response	Rationale
		Date.
SSE	No	Our answer is based on the fact that the DCMF-MIG group is addressing duos charging issues consistent with P280 requirements. The group is proposing to introduce changes to the DUOS charging methodology to take effect 1st April 14 . An April date would also avoid DNO's having to make significant changes to their pricing models mid-way through the year and thus avoiding potential significant changes to end-customer tariffs. Suppliers/distributors will also need to make appropriate changes to their billing/IT systems In view of this and other change commitments (eg for Smart foundation) we would suggest an implementation date of April 2014.
EDF Energy	No	See response to Question 1. If it is determined that P280 should be implemented, despite lack of evidence that it is the best way forward, we think a later implementation would be desirable. This would reduce costs for those parties whose systems and processes will take longer to adapt, and avoid risks to reliable and accurate customer pricing and billing. A notice period of at least 18 months should be provided. If proposal P272 were to be approved, and some participants were for some reason unable to accommodate the relatively modest increases in numbers of site-specific DUoS bills for HH settled meters, there might be benefit in implementing changes at or shortly prior to P272 implementation. However, changes to DUoS billing do not fall within the scope of the BSC and there would be no benefit for BSC settlement.
Paul Scrafton	Yes/No	-

Question 3: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P280?

Summary

Yes	No	Neutral/Other	No response
7	1	1	1

Responses

Respondent	Response	Rationale
Electricity North West	Yes	This facilitates the changes necessary to deliver this modification.
Western Power Distribution plc	Yes	-
Northern Powergrid	Yes	The proposed legal text changes appear to align with the requirements of P280.
ScottishPower	Yes	-
IMServ Europe Ltd	Yes	-
ENC	No	See [response to question 1]
RWE npower	Yes	The red lining appears to deliver the intention of P280.
SSE	Yes	-
EDF Energy	Yes/No	<p>We have not formally reviewed the legal text, but make the following comments:</p> <ul style="list-style-type: none"> At S-2 3.5.11, 3.5.12, and numerous subsequent sections, the legal text indicates that half-hourly aggregation should have a new sub-aggregation by Line Loss Factor Class. However, the solution only requires this for those half-hourly sites in new Measurement Classes F, G and H, where the data is to be reported in new sections of existing flows. In all other cases, the sub-aggregation will not be reported anywhere and is superfluous. At Annex V-1 Table 7, the General Description of data to be provided in the DUoS report is not a clear description of the data that would actually be reported. Currently this report relates to non-half-hourly aggregated and profiled EAC/AA data. The proposed new text refers to an association of reported data with Profile Class and Standard Settlement Configuration, without clearly stating what this means. The new information would

Respondent	Response	Rationale
		<p>actually relate to a supplier's unprofiled Profile Class 0 half-hourly metered data for Metering Systems in Measurement Classes F,G,H determined for combinations of Consumption Component Class and Line Loss Factor Class and reported by ("dummy" SSC?) SSC and LLFC, from which volumes for Metering Systems in Measurement Classes F,G,H per DNO in a particular GSPG can be determined.</p> <ul style="list-style-type: none"> At W3.1.1(e), the proposed inclusion of new Measurement Classes F,G and H is inconsistent with the exclusion of existing Measurement Class E. Measurement Class E is included in W3.1.1(f) in order not to discriminate in relation to disputes between equivalent sites settled non-half-hourly and voluntarily settled half-hourly. Mandatory HH settlement and the treatment of disputes are outside the scope of the proposal, and for this reason Measurement Classes F, G and H should be treated in an equivalent non-discriminatory manner with Measurement Class E. If Annex X-2 Table X-8 is to be changed to include the new Consumption Component Classes as suggested, which we would support if this proposal is approved, the text at Annex X-2 3.5.1 should also be changed. At Annex X-2 Table X-6, the description of Measurement Class does not make clear that the classification of a Metering System to new Measurement Classes F,G,H rather than E (or C) is voluntary by the Supplier. At the end of the text after Table X-8, in the descriptions of the new Measurement Classes under Consumption Level Indicator, it is not made clear that the aggregation of consumption data (including export) only occurs if the Supplier has requested it by registering the Metering System with the appropriate Measurement Class.
Paul Scrafton	Yes/No	-

Question 4: Do you have any further comments on P280?

Summary

Yes	No
8	2

Responses

Respondent	Response	Rationale
Electricity North West	No	-
Western Power Distribution plc	No	-
Northern Powergrid	Yes	P280 will facilitate any DCUSA changes for smart metering along with any potential discrepancies between half hourly and non-half hourly tariffs.
ScottishPower	Yes	ScottishPower believe that the solution as now proposed within P280 resolves many of the issues relating to other consultations such as P272 and DCP 103. P272 seeks to mandate transfer of Profile Classes 5-8 to HH Settlement and P280 now allows this albeit on a voluntary basis. DCP 103 seeks to mandate HH Settlement (& site-specific Billing) for all SMART Metering Customers. P280 allows HH Settlement but without the burden of site specific Billing which was deemed untenable by all parties.
IMServ Europe Ltd	Yes	This 'enabling' change removes one of the key barriers identified by the P272 Workgroup. The rollout of SMART and 'Advanced' metering results in HH data being available to the market. As HH data is available it should be fully utilised. BSC Objectives C & D are better facilitated by this data being used for Settlement. This change provides the means for this data to be used efficiently for HH Settlement.
ENC	Yes	<p>Clearly the LLFC is a code that is used to describe set of loss adjustment factors that relate to an MPAN. Coincidentally many DNO's use the LLFC to define the tariff. This is not the case in ENC where we use the combination of the LLFC, SSC and PC to define the NHH tariffs for a metering point.</p> <p>Distributors only have 999 available to them and many distributors have severe restrictions and capacity to create new LLFC's, this is a particular issue for IDNOs operating across 14 GSP groups any proposed solution should not constrain distributors from operating across all GSPs in providing use of system to all class of customer in all GSPs (i.e. no distortion of competition).</p> <p>If this solution is implemented we would expect Elexon to work with affected parties to develop solutions that can be accommodated with limited range of LLFC's.</p> <p>We believe that not all distributors will have the capacity to facilitate this change with the restrictions</p>

Respondent	Response	Rationale
		currently imposed on the number of LLFC's available to them.
RWE npower	Yes	If CT metering is seen as the distinction between proposed measurement class 'G' and proposed measurement class 'H', then there will be a requirement for CT ratio details (held within DTC flow D0150) to be quality checked for accuracy (much detail held is shown to be invalid or spurious).
SSE	Yes	<p>Implementation of Modification P280 is heavily dependent on the delivery of a solution for the increased accuracy of the HH Data Collection flows (D0036 & D0275) - currently they are set to report Half Hourly kWh volumes to 1 decimal place. One of the requirements for P272 is for the increased resolution for HH meter data to 0.001kWh from 0.1kWh. For the purposes of aggregating large amounts of low volume data sets, this definition needs to be made more accurate, enabling the reporting of Half Hourly kWh volumes at 3 decimal places. This solution needs to be implemented alongside implementation of P280.</p> <p>Also, there is still unknowns with regards to the role of the DCC which may impact on the effectiveness of the P280 solution.</p>
EDF Energy	Yes	<p>We note the workgroup has chosen to combine some of the categorisations of data for export Metering Systems for the purposes of reporting by Consumption Component Class. We hope this would not lead to unforeseen difficulties in future if the proposal is implemented.</p> <p>Please see our responses to the two previous consultation on this subject. Some of the comments made are repeated here:</p> <ul style="list-style-type: none"> We feel this change is premature and as such potentially time limited. The introduction of smart metering may create many new desired classifications of consumers, for various purposes. To spend significant amounts of money on a potential change that might have limited long term future is not our preferred way forward. LDSOs might have a desire for individual HH customer data for various reasons such as operational, network modelling, or validation purposes. That is something for them to decide. It seems slightly odd that DNOs could have fundamental difficulty with volumes for site-specific billing yet might require, and could be able to

Respondent	Response	Rationale
		<p>handle, the volume of individual measurements for other purposes. If DNOs receive individual data, it would seem a small step to aggregating it themselves. Again, this is an issue for which more significant changes are likely within the next decade under smart metering.</p> <ul style="list-style-type: none"> • We would expect the billing function within LDSO systems to distinguish aggregated data to be used for billing from the individual data used for other purposes. However, the existence of duplicated data in reports ostensibly for DUoS billing would require robust processes within LDSOs. We require more information on how LDSOs would guarantee no double charging to be able to answer this question definitively. • In respect of BSC Objectives, the only benefit of this proposal appears to be a reduction in the volume of data reported to DNOs for the purposes of DUoS billing, compared with current site-specific data. While the reduction in volume might have practical benefits in reducing some communication charges, this direct benefit is probably quite small. • All other benefits appear to be in the realm of DUoS charging, either within DNO companies, or in the handling of DUoS bills by Suppliers. The link between these benefits and the BSC objectives is not clear. • The cost for EDF Energy to implement this proposal would be considerable. Increases in the number of sites settled half-hourly are expected to remain relatively low for several years. Until a larger infrastructure is in place throughout the industry to handle the increased data volumes in the end-to-end supply process, and consumer products are developed that deliver benefits from half-hourly settlement, the overall benefits could be small. The rollout of smart metering and expected future developments in DCC processing, and probable more fundamental changes to settlement towards the end of the decade, could make this proposal P280 redundant, and expenditure on it could turn out to have been wasted if benefits do not materialise quickly. The cost-benefit return period for this proposal might be too long to justify making expensive changes with limited life.
Paul Scafton	Yes	I refer to the 3 rd paragraph on page 9 and section 7 on page 17 of P280 Draft Modification Report regarding the impacts on suppliers that choose not to support the

Respondent	Response	Rationale
		<p>new Measurement Classes.</p> <p>The modification claims that there is no impact on a supplier if that supplier chooses not to support the new measurement classes, however I would challenge this based on the following:-</p> <p>On a registration (D0055 sent) a supplier can populate this flow in full, including specifying Measurement Class, or they can leave values null which has the resultant effect of the registration assuming the existing Measurement Classes. Where measurement class has not been specified on the D0055 and the existing Measurement Class of the MPAN happens to be one of the new Measurement Class of F, G or H, this value will be returned by MPAS on both the D0217 and D0260 flows to the gaining supplier.</p> <p>If the gaining supplier has elected not to support this new measurement class and has therefore made zero changes to their systems, how will they:-</p> <ol style="list-style-type: none"> 1. Validate the D0217/D0260 flow with a new measurement class value? Will an unchanged system simply reject these flows? 2. If it loads them irrespective of measurement class, how would the system then flag up internally when this occurs so that a change of measurement class can be actioned by the gaining supplier? <p>If the change of measurement class is not carried out prior to supply start date, then the supplier will receive D0040/D0298 flows containing the new fields, and this can then cause problems for any supplier systems currently set to receive these flows, if no amendments to supplier systems are made.</p> <p>In the current market, similar problems are encountered when NHH only suppliers gain HH customers in error and vice versa. These numbers are usually fairly low and manageable.</p> <p>However, in the future, the sheer volume of customers that are on these new Measurement Classes will be in their 100s of thousands if not millions. The potential for error is significant.</p>