

## P292 Consultation Responses

Consultation issued on 19 March 2013

We received responses from the following Parties

Company	No BSC Parties / Non-Parties Represented	Role of Parties/non-Parties represented
British Gas	1/0	Supplier
EDF Energy	10/0	Supplier / Party Agent / Generator / Consolidator / Exemptable Generator / Trader
Electricity North West Limited	1/0	Distributor
E.ON	5/7	Supplier & Supplier Agents
ScottishPower	3/1	Supplier, Distributor and Party Agents
SSE	2/1	Supplier/Generator/Trader/ Party Agents
RWE npower	9/0	Supplier/Generator/Trader/ Consolidator/Exemptible Generator/Party Agent
TMA Data Management Ltd	0/1	HHDC, HHDA, NHHDC and NHHDA

What stage is this document at in the process?

01 Initial Written Assessment

02 Definition Procedure

03 Assessment Procedure

04 Report Phase

Question 1: Do you agree that the draft legal text, in Attachment A, delivers the intention of P292?

**Summary**

Yes	No	Neutral/Other
6	2	0

**Responses**

Respondent	Response	Rationale
British Gas Trading Limited	No	<p>We do not believe the additional paragraph 2.7.8A is required. The Supplier is already obligated under Section L Para 2.4 to establish, maintain and provide Meter Technical Details and the Supplier is able to delegate these functions to it's agents at it sees fit.</p> <p><b>2.4 Meter Technical Details</b></p> <p>2.4.1 The Registrant of each Metering System shall, in accordance with the relevant BSC Procedures:</p> <ul style="list-style-type: none"> <li>(a) establish and maintain Meter Technical Details in respect of the Metering Equipment;</li> <li>(b) ensure that such Meter Technical Details are true, complete and accurate;</li> <li>(c) provide such Meter Technical Details to the CDCA or (as the case may be) to the relevant Data Collector.</li> </ul> <p>The new drafting for 2.2.1 appears to remove the obligation on the Meter Operator Agent to provide Meter Technical Details to the NHH Data Collector where a SMETS meter is installed. We agree that the obligation should sit with the Supplier but we believe the legal text should make clear that the Meter Operator Agent can still provide Meter Technical Details to the NHH DC where instructed to do so by the Supplier for SMETS meters.</p> <p>We also note that the modification proposal makes reference to CP 1388. Elexon has clarified that approval of P292 does not automatically introduce CP 1388 however we believe that the proposal should not refer to either CP1388 or the detail proposed within it. The modification should say something along the lines that 'detailed changes to BSCPs and MTD flows will be defined in change proposals subsequently raised under the appropriate codes'.</p>
EDF Energy	Yes	EDF Energy broadly agrees that the draft legal text

Respondent	Response	Rationale
		<p>delivers the intention of P292, however we would like the following to be noted:</p> <ul style="list-style-type: none"> <li>• S2.2.1(b) refers to "Half Hourly Metering Systems and Non Half Metering Systems which have not been installed in compliance with the Smart Metering Equipment Technical Specifications", and the existing arrangements would continue to apply for these. <ul style="list-style-type: none"> <li>○ There is a typographical error; Non Half Metering Systems should read Non Half Hourly Metering Systems.</li> <li>○ Reference here to existing arrangements for non SMETS-compliant HH and NHH metering systems implies alternative arrangements for SMETS-compliant HH and NHH metering systems. 2.2.1(c) and 2.7.8A specify obligations for SMETS-compliant NHH systems. But the legal text is silent on SMETS-compliant HH systems. Until other arrangements are formally agreed for SMETS HH systems, we think the Meter Technical Details for such meters should be managed as currently, by the Meter Operator Agent. This could be achieved by the addition of a comma after "Half Hourly Metering Systems" or preferably, with less potential for misinterpretation, by identifying explicitly "(i) Half Hourly Metering Systems, and (ii) Non Half Metering Systems which have not been installed in compliance with the Smart Metering Equipment Technical Specifications".</li> </ul> </li> <li>• Definition of "Smart Metering Equipment Technical Specifications": We do not believe Energy Supply Licence is a defined term, and that this should refer to "Electricity Supply Licence Standard Conditions", or perhaps the "relevant energy Supply Licence".</li> </ul>

Respondent	Response	Rationale
		<ul style="list-style-type: none"> <li>• The Smart Metering Equipment Technical Specification will change in the future. We understand that any changes to the Specification will be managed under the Smart Energy Code and suggest some reference to this should be included in the legal text.</li> <li>• The expression "Metering System ... installed in compliance with the Smart Metering Equipment Technical Specifications" is used in the legal text. Could this more explicitly be expressed as "Metering System that is/is not a Smart Metering System" (see licence conditions) or "Metering System that is/is not compliant with the relevant Smart Metering Equipment Technical Specifications at the time of its installation"? This would capture the concept of compliance at time of installation.</li> </ul> <p>We note that the draft legal text makes it clear that the Meter Operator remains responsible for the maintenance and provision to the relevant Supplier of technical data relating to an installed SMETS NHH smart meter, but that the Supplier, who will be responsible for configuring that meter for settlement purposes, is responsible for ensuring that the NHHDC is provided with the data it requires on a timely basis. As noted below this legal text reflects the roles and responsibilities set out in DECC's target operating model for smart metering.</p>
Electricity North West Limited	Yes	The legal text provides clarity that the Meter Operators and the Suppliers responsibilities in the case of a Non Half Hourly Smart Meter to SMETS specification being installed.
E.ON	Yes	-
RWE npower	Yes	The additions to the BSC that P292 delivers are only an enabler to allow subsequent process changes to be introduced through the CSDs without the potential of placing parties in a position where they have to choose whether to comply with the BSC or BSCPs. As a result of this we believe that the legal text does deliver the intention of P292.

Respondent	Response	Rationale
ScottishPower	Yes	<p>There is a typo in 4.3.1 (f), where 'be' is missing from the phrase 'as the case may'.</p> <p>Also, the SMETS definition intended for Annex X refers to the 'Energy Supply Licence'; while this generic term might have been used by DECC, the BSC is (for the time being, at least) solely concerned with electricity and any such reference should, therefore, be to the 'Electricity Supply Licence'.</p> <p>In addition we believe that it is incorrect to include a reference to Half Hourly Metering Systems in para 2.2.1 (b), given that P292 states that Section S amendments are in respect of smart NHH Metering Systems.</p>
SSE	No	Please see our response to Q5. The wordings of the legal text may not be appropriate depending on the technical solution that the industry finally agrees on.
TMA Data Management Ltd	Yes	-

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

### Summary

Yes	No	Neutral/Other
5	3	0

### Responses

Respondent	Response	Rationale
British Gas Trading Limited	No	<p>Our understanding is that the driver for these changes is the Smart Metering Implementation Programme (SMIP) BPDG Legacy System Changes (Enduring) Paper published on 6th October 2011.</p> <p>Within the paper it makes clear that the proposed system changes cover the period of DCC Go Live onwards and do not cover the period from now until DCC Go Live.</p> <p>We believe therefore that it should be made clear</p>

Respondent	Response	Rationale
		<p>that although changes may be required for testing, actual implementation should be aligned with DCC Go Live.</p> <p>This will enable parties that do not wish to participate in the foundation stage of smart metering from having to make potentially significant changes to their systems to handle potentially new flows from different parties under the current baseline.</p> <p>The Legacy System Changes paper also makes clear that any consequential changes should follow a minimal change approach and should in particular:</p> <ol style="list-style-type: none"> <li>1. Avoid where possible any changes to current role definitions</li> <li>2. Minimise the changes required to registration systems</li> </ol> <p>We believe that the MTD changes as specified by the joint MRA/Elexon group to date have not kept within the spirit of this approach.</p>
EDF Energy	Yes	<p>EDF Energy believes that the suggested Implementation Date of June 2014 is appropriate as it is not only in time for the proposed implementation timescales for the Data Communications Company (DCC) as published by DECC, but also the likely start of rollout of SMETS compliant metering systems. However, successful implementation is further reliant on changes being made to the relevant lower level processes within the Code Subsidiary Documents to support the principles of P292 (e.g. CP1388).</p> <p>DECC have proposed that the DCC will go live in Q4 2014 following a period of market readiness testing. Any consequential changes that support this implementation should be in place in sufficient time for them to form part of the end to end testing of business processes as part of this market readiness testing process. Any later implementation date could create a risk in terms of DECC's timelines for the go-live for the DCC.</p> <p>Note that Suppliers will be rolling out SMETS compliant meters prior to the DCC go-live as part of the Foundation phase. In most cases these smart meters will be configured by the Supplier using their head end service provider/Smart Metering System Operator (SMSO), in advance of, and in a similar manner, as through the DCC under the full smart arrangements. Early implementation of the proposal would reduce the requirement for an interim process</p>

Respondent	Response	Rationale
		<p>to satisfy the current BSC obligations on Meter Operators, which can only be fulfilled by the Supplier/SMSO sending their Meter Operator relevant updates of settlement configuration information.</p> <p>As noted above, P292 will need to be reflected into the CSDs, and any change (whether this is the current proposal in CP1388 or any alternate that also supports the principles of P292) will most likely require a year to implement once approved. An earlier implementation date than June 2014 would therefore be unlikely to be achievable.</p> <p>The proposed implementation date would reflect the most reasonable point at which the current interim arrangements are replaced with a robust set of on-going arrangements for the management Meter Technical Details relating to smart metering.</p>
Electricity North West Limited	Yes	The June 2014 implementation date enables parties to develop the systems and process changes required to facilitate P292 and deliver within in the timescale.
E.ON	Yes	Given that the solution has been through considerable industry debate and that the modification is an enabler for future changes that are necessary to support smart metering we believe the timescale is appropriate.
RWE npower	Yes	Npower are supportive of a June 2014 implementation date for P292 but we believe this should be completely divorced from the implementation of changes P292 may enable. We strongly believe any changes enabled by P292 should be considered for implementation on their own merit and not automatically be tied to the implementation of P292.
ScottishPower	Yes	It seems a sensible approach to change the BSC prior to making changes to the CSDs
SSE	No	We agree with the Panel's suggested implementation date to be in parallel alongside any CP that delivers the requirements but this may or may not be the proposed June 14 date.
TMA Data Management Ltd	No	The implementation date refers to a CP. If P292 needs to be implemented alongside a still unknown CP, it is not appropriate to determine the implementation date before both elements are known and have been reviewed by the Industry.

Question 3: Do you agree with the Panel's view that P292 better facilitates the achievement of BSC Objective (d)?

**Summary**

Yes	No	Neutral/Other
6	2	0

**Responses**

Respondent	Response	Rationale
British Gas Trading Limited	No	<p>The justification provided as to why this modification proposal better facilitates the objectives of Applicable BSC Objection (d) is that it enables Suppliers and NHHMOAs to fulfil their future responsibilities as is being defined under DECC's SMIP operating model.</p> <p>By removing optionality as to who the supplier is able to delegate responsibility to, for maintaining and providing meter technical details, Suppliers may incur significant costs in system changes. These changes may have a limited shelf life depending on how the Data Communications Company (DCC) will operate in future. Changes therefore need to be kept to a minimum to ensure the efficiency test is met.</p>
EDF Energy	Yes	EDF Energy agrees with the Panel's view P292 better facilitates the achievement of BSC Objective (d) for the reasons detailed in the report and also as noted in our response to question 5 below.
Electricity North West Limited	Yes	As the number of parties involved distributing the data will be reduced and all responsibility of smart meters will fall to the Supplier and not their appointed agents.
E.ON	Yes	This will assist suppliers and MOAs in meeting their new obligations.
RWE npower	Yes	Npower agree with the Panel's view that P292 will allow for subsequent changes to be developed and implemented that will result in better efficiency with the implementation of the BSC.
ScottishPower	No	<p>It is very important that we manage out elements of the existing baseline that might otherwise go on to inhibit or prevent the rollout of smart metering.</p> <p>However, in our eagerness, it is equally important that we do not lose sight of the purpose of the BSC; smart metering is not a settlements programme,</p>

Respondent	Response	Rationale
		<p>either in concept or execution; rather, it is about consumer data and accurate customer billing, neither of which specifically concern the BSC. Moreover, aside from the longer term effects changing consumer behaviour might have on NHH profiles, there is little to suggest the existing BSC baseline will not remain fit for purpose in the face of the smart implementation.</p> <p>Therefore, though we think it is clearly right that the BSC continues to fulfil its settlement role with regard to SVA metering, smart or otherwise, we also believe it should be confined to implementing only those consequential changes that are strictly relevant to the settlement function, and not be permitted to expand into developing a 'BSC Smart Solution'; certainly not until we are fully confident of the intended eventual purview of the Smart Energy Code.</p> <p>We note that a recently published Government paper, 'Smart Energy Code Set-up Arrangements', refers to the SEC as being: "... a new multiparty agreement which will specify... provisions to govern the end-to-end management of smart metering." We would, therefore, consider any endeavour to simply absorb smart specific activities into existing industry codes, while the SEC is still in development, to be premature and risks fragmenting the governance arrangements.</p> <p>It ought to be noted that there should be no requirement to send a Meter Operator to change the configurations of installed smart metering systems, nor should there be any requirement for a MOP to transfer any such details upon a change of Supplier; in such latter event, the incoming Supplier will simply send a replacement configuration to the meter, irrespective of that applied by the previous Supplier, and inform the NHHDC.</p> <p>With regard to the original proposal, we are therefore unclear as to how creating a further layer of complexity, solely to accommodate something that has no bearing on electricity settlement, can be said to better facilitate objective (d). From a BSC perspective, it would surely be more efficient to leave such matters, which are related uniquely to smart meters, to governance by the Smart Energy Code.</p> <p>To that end, we would have been more supportive of an alternative that merely enabled the transfer of Meter Technical Details from the Supplier to the NHHDC - as an aside, we are not actually convinced that such a Modification would be required at all, as</p>

Respondent	Response	Rationale
		<p>Section L 2.4.1 (c) appears to make the necessary provisions already - but left the requirements of the Meter Operator largely as is, with the addition of:</p> <p>"2.2.1 The principal functions of a Meter Operator Agent in respect of SVA Metering Systems that have not been installed in compliance with the Smart Metering Equipment Technical Specifications and for which it is responsible are:"</p> <p>For the reasons outlined above, of course, we recognise such a proposal would similarly fail to satisfy the requirements of Objective (d). Nonetheless, we would suggest it might better satisfy Objective (c): i.e. allowing Suppliers to determine how best to maintain these smart-meter details would be less of a commercial constraint. Somewhat disappointingly, however, no alternative proposal is presented here for consideration.</p>
SSE	Yes	It's the only objective that fits.
TMA Data Management Ltd	Yes	-

Question 4: Do you agree with the Panel's view that the Proposed Modification shouldn't be progressed as a self-governance modification?

### Summary

Yes	No	Neutral/Other
7	1	0

### Responses

Respondent	Response	Rationale
British Gas Trading Limited	Yes	<p>We agree with the Panel's view that the Proposed Modification should not be progressed as a self governance modification.</p> <p>The modification seeks to remove the obligation from meter operators to maintain and provide meter technical details where the meter is a SMETS compliant smart meter. As stated above this obligation already exist for suppliers for all meters in</p>

Respondent	Response	Rationale
		<p>section L of the code.</p> <p>The underlying changes that underpin this modification, whilst not being agreed, could have significant cost and system change implications for parties. We therefore agree that this proposal should not be progressed as a self-governance modification.</p>
EDF Energy	Yes	<p>EDF Energy agrees that P292 should not be progressed as a self-governance modification as this change has a material impact on BSC Parties, and Party Agents. We note from the outcome of the discussion that there is not unanimous support for the current proposed CSD changes (CP1388) and that there are clearly mixed views on this topic at that level. Progression of P292 as a self-governance modification could result in wasteful use of resources in an appeal to Ofgem if approved via this route. Ofgem approval of P292 would mitigate these risks.</p>
Electricity North West Limited	Yes	<p>As there are changes to processes and parties obligations P292 should not go through self governance modification.</p>
E.ON	No	<p>The mod is more of an enabler to facilitate the change to how current obligations will be delivered for smart meters. It's not necessarily the introduction of new obligations but a migration of obligations from a supplier's agent to that supplier. Given the mod doesn't introduce the specific mechanisms but is then enabler for future changes which will be introduced by formal change processes.</p>
RWE npower	Yes	<p>Npower recognise that the P292 changes being made are relatively minor, however the subsequent changes that this modification will enable will result in significant changes to the existing arrangements. As a result of this we believe this modification should not progress as self-governance.</p>
ScottishPower	Yes	<p>While the amendments to the BSC itself are relatively straight forward the proposed change heralds in significant industry change going forward and as such P292 should not be treated as a self-governance modification.</p>
SSE	Yes	<p>This is a high profile area which is why it should not be self-governance.</p>
TMA Data Management Ltd	Yes	<p>The change of responsibility, even if minor in terms of changes in the BSC is of a magnitude for impacted parties that justify not progressing P292 as a self-</p>

Respondent	Response	Rationale
		governance modification.

Question 5: Do you agree with the Panel's views that the Proposed Modification should be approved?

### Summary

Yes	No	Neutral/Other
5	3	0

### Responses

Respondent	Response	Rationale
British Gas Trading Limited	No	<p>We understand that this modification proposal is a "hook" within the code for any detailed requirements to be introduced through a change proposal.</p> <p>However as stated above we believe the obligations on the Supplier to "establish, maintain and provide" Meter Technical Details is already covered under Section L of the code.</p> <p>Without the amendments proposed above we do not agree with the Panel's views that the Modification should be approved.</p> <p>Given the complexity of the changes proposed and the links between P292 and any underlying change proposal we believe the Panel should reject this proposal and recommend further consultation is carried out by Elexon on some of the more "minimal change" options that have been discussed by the Elexon/MRA MTD Working Group.</p>
EDF Energy	Yes	<p>EDF Energy agrees that the Proposed Modification should be approved, for the reasons detailed in the draft Modification Report issued as part of this consultation, to align the BSC with DECC's SMIP Operating Model, so requiring and enabling Suppliers and NHH MOAs to fulfil their future responsibilities.</p> <p>The draft Modification Report suggests that the SMIP Operating model on which this proposal is based is itself only a proposal. This implies a level of uncertainty that we do not believe exists. A number of policy decisions have been made by DECC that we believe effectively mandate P292. Most specifically, the security model defined for the DCC means that only Suppliers will have the authorisation to perform</p>

Respondent	Response	Rationale
		<p>any update on a smart meter, meaning that only they will be able to configure the meter for settlement purposes. Meter Operators will have no access at all to this functionality. This is reflected in the published Target Operating Model, Security Architecture, DCC User Gateway Catalogue (which sets out access rights to DCC services) and also consultation responses issued by DECC.</p> <p>Given that DECC's policy position is highly unlikely to change, the proposal within P292 is reflective of the smart metering operating model and the role of Suppliers within this, and should be approved.</p> <p>As noted above, we further believe that if the right changes to the relevant CSDs are progressed correctly (whether this is CP 1388, which EDF Energy supports, or an alternate), this modification will allow for more efficient industry processes to be developed, especially in regards to the passing of Meter Technical Details to the NHHDC. This in turn will reduce the incidence of missing or erroneous data, and the effort and time required to resolve problems, and so allow accurate data to be passed into settlement on a more timely basis than currently. With these associated changes, P292 would allow BSC Objective (c) relating to purchase and sale of energy and competition to be better met, through more accurate and timely volume allocation, and BSC Objective (d) concerning effective operation of BSC processes to be better met, in the long term once new processes are in place.</p>
Electricity North West Limited	Yes	P292 should improve the accuracy of the data in settlements as the Supplier will be responsible for maintaining and distributing the data.
E.ON	Yes	-
RWE npower	Yes	<p>Npower recognise the need for P292 to be implemented in order to allow subsequent changes to CSDs to be progressed that will enable the implementation of an appropriate solution to effectively manage Smart metering data. However, npower are of the view that any subsequent changes to CSDs should be developed in conjunction with the DCC and it's Service Providers so that a robust and effective industry solution is developed.</p> <p>Therefore, npower strongly believe that any decision on P292 should be made solely on the merits of the modification itself, and should not be influenced by</p>

Respondent	Response	Rationale
ScottishPower	No	<p>other potential changes this modification will enable.</p> <p>Please refer to our response to Question 3</p> <p>It is very unusual for any other than housekeeping Modifications, to be sent straight to the Report Phase. We assume the Panel took this decision because they felt as the matter had already been debated at some length by a work group (albeit a work group without any vires conferred under the BSC), there was little point in establishing a Modification Group for the purpose of revisiting it.</p> <p>However, whilst there may be some merits concerning efficiency in this argument, it is important to recognise that the work group never specifically considered this Modification, and regarding those matters it did discuss, there was no consensus amongst its members. We are also given to believe that several alternative solutions were tabled, yet none are identified here as possible Alternative Modifications. It is also worth noting that industry's response to the matters contemplated by the work group appeared equally inconclusive when it was consulted on CP1388, and the SVG voted to reject.</p> <p>We are concerned that sending this Modification straight to the Report Phase could limit the debate here by limiting the potential for any Alternative Modification to be raised.</p>
SSE	No	<p>Following SVG's majority rejection of the proposed solution, it is not now clear what the technical solution will be. There are various options, some of these were put forward by the Meter Technical Details Workgroup 8 and we believe it would be prudent to develop and consult the industry on these.</p> <p>We do not believe that the Draft Modification Report should include references to a proposed change which was not approved by SVG.</p> <p>We do not believe that the workable solution that DECC were happy for the industry to develop meets the objective for the SMIP of minimal change.</p> <p>We believe that depending on what the industry finally agrees on the technical solution, it could have a material effect on the modification.</p>
TMA Data Management Ltd	Conditional Yes	<p>P292 is a standalone Modification. However the many references to CP1388 make it difficult to support P292 on its own merit. P292 can only be approved if it does not rely on CP1388 to be the only response to</p>

Respondent	Response	Rationale
		the new requirements introduced by P292.