

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

Introduction

These FAQs are intended to provide Market Participants with an overview of the most common questions ELEXON has been asked on topics related to the Modifications P272, P300, P320 and P322. This document will be updated periodically to capture any new questions or common discussions ELEXON has with Market Participants.

This list is not intended to be exhaustive or replace any formal guidance issued. If any question you have is not answered within these FAQs, or for more details on any area, please contact your OSM in the first instance.

General

What do I have to do, and by when?

P272 mandates that all Advanced Meters (AMR) installed on Profile Class (PC) 5 to 8 MPANs must be settled Half Hourly (HH) by 1 April 2017. Alongside this, P300 re-labels Measurement Classes (MCs), E, and introduces new MCs F and G, in November 2015, which these MPANs may be moved to. Additionally, there was an Ofgem requirement to make reasonable endeavours to fit an AMR Meter to all PC 5-8 MPANs by 1 April 2014.

P322 introduces an obligation on Suppliers to migrate their AMR in PC 5-8 within 45 Working Days (WD) after contract renewal or Change of Supplier (CoS) to Half Hourly Settlement.

As part of Performance Monitoring introduced by P322, Suppliers will be required to submit Supplier Migration Plans (SMPs) to the Performance Assurance Board, providing information on how they expect to undertake the migration. The plans need to be sent to p272implementation@elexon.co.uk by 31 August 2015. In addition, Suppliers will be required to provide monthly updates on their performance against their original plans. The first update is due on 1 January 2016, reporting on the activity in November 2015.

The above does not apply to Non Half Hourly (NHH) Export and, where applicable, Unmetered Supplies (UMS), which may continue to be assigned to Profile Class 8 after 1 April 2017.

The PAB will be requesting plans from Suppliers. What is the purpose of these plans, and will the details of the plans be shared with the industry?

As part of P322, it was determined that the PAB will require to see and approve Supplier Migration Plans that outline how Suppliers intend to undertake the migration to Half Hourly Settlement to comply with P322 and P272. This is to give the PAB the assurance that Suppliers have got an adequate project plan in place that will then be monitored through Supplier submitted monthly updates. The plans will be discussed solely at the PAB and approved confidentially and the information will not be shared with any other Parties.

Will there be a grace period after the April 2017 implementation date/deadline for some legacy issues to be resolved?

All applicable Metering Systems must be HH settled by the implementation date of 1 April 2017. After this time, ELEXON will begin reporting to the PAB any PC5-8 Metering Systems which are not being settled HH for the PAB's consideration on what steps to take to address the non-compliance.

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

Is there any further information available to help out with the large scale Change of Measurement Class (CoMC) that will be needed?

We have published a CoMC Guidance Note on our [website](#) to help.

Under P322, can a Supplier move the MSID to Half Hourly Settlement before the contract renewal date?

Suppliers can move the MSIDs in PC 5-8 at any point to Half Hourly Settlement, as long as it is completed before 1 April 2017 and does not breach the 45 Working Day requirement on contract renewals. This should be reported in Supplier monthly updates as 'additional CoMC activity'.

Can I move to PC 3 or 4 to avoid having to migrate to HH Settlement?

ELEXON has had a number of queries raised regarding Metering Systems (MSs) in Profile Classes (PC) 5-8 being downgraded to PC3/4, rather than being migrated to Half Hourly (HH) Settlement under P272.

If a PC5-8 MPAN has an advanced meter fitted, then it must be migrated to HH Settlement in line with the P272 requirements, and cannot be moved to PC3/4 for the following reasons:

- The Standard Licence Condition (SLC), section 12.17-12.22 states that, from 6 April 2009, any new sites that meet the Profile Class 5-8 definition in the BSC must have an advanced meter fitted.
- Any existing Profile Class 5-8 sites at 6 April 2009 were required to have an advanced meter fitted by 6 April 2014.
- Additionally, from 6 April 2014, any non-domestic premises with Current Transformer metering must have an advanced meter fitted.
- From 1 January 2021, all premises with Current Transformer metering, whether domestic or non-domestic, must have an advanced meter fitted.

Where there is such a licence obligation, Suppliers must transfer existing Metering Systems to Half Hourly Settlement by 1 April 2017, as detailed in P272.

Qualification

Our Supplier MPID is currently qualified as NHH only. Will we need to obtain further Qualification?

If you currently have PC5-8 Metering Systems that meet the Supply Licence and P272 requirements and wish to continue supplying them after 1 April 2017, then you will need to gain HH Qualification too. Please contact our Qualification team (qualification@elexon.co.uk) who will be able to explain the complete process to you.

Will Suppliers who currently only operate in the NHH market, but have PC 5-8 Metering Systems, be informed about the P272 changes and potential further Qualification required?

All Suppliers and Supplier Agents have been contacted already by their OSMS to outline the position they are in. If you have not received this information, please contact your OSM or the Qualification team.

If everyone now needs to gain additional Qualification, will this slow down the process and potentially affect people getting Qualified in time?

There are only a few parties with only NHH Qualification, some of which have already begun the HH Qualification process. Therefore, ELEXON does not expect any extended timescales in the Qualification process.

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

Settlement

If a PC 5-8 customer does not want to pay the HH charges, can we move them to PC 3 or 4 to avoid them having to switch to being HH settled?

P272 places a requirement on Suppliers to settle any Metering Systems in the HH market where the Supplier has an obligation in its Standard Supply Licence to install an advanced Meter. So where a Metering System is already subject to an advanced Meter, under Standard Supply Licence Condition 12.21, irrespective of its Profile Class, it must be settled HH by 1 April 2017. New connections at non-domestic premises can be allocated to Profile Classes 3 and 4 provided that maximum demand is not recorded. New connections at non-domestic premises where maximum demand is recorded must be settled HH from 1 April 2017.

Migrating our Meters from NHH to HH at any time other than midnight might mean estimated data needs to be used in Settlement – and thus Suppliers' performance could be affected. Is there any way to avoid or mitigate this impact?

Estimating zeros for Settlement Periods before the final NHH reading will result in all data for the Settlement Day being treated as estimated. To avoid a negative impact on reading performance, the HHMOA should endeavour to take a midnight reading wherever possible.

When appointed as both HHMOA and HHDC for a Metering System, the HHDC may calculate a midnight reading using HH interval data to adjust a reading taken later on the same day. This will allow actual HH data to be submitted for the whole day without double-counting consumption.

An HHDC who is not also appointed as the HHMOA may take a midnight reading and provide this to the HHMOA to facilitate the process. If an HHDC takes a midnight reading and the HHMOA submits an identical value, the HHDC may submit actual HH readings for the whole Settlement Day.

Are there any provisions under P322 when a new Supplier overtakes an MSID that is in the process of Change of Measurement Class?

It is unlikely for the current Supplier to initiate a CoMC if there is a risk to lose the customer. Therefore, the CoMC will tend to start after contract termination, whether initiated by a new Supplier or the existing Supplier.

How does a HHDC avoid data estimation if the HHMOA is appointed after HHDC and the Meter Technical Details are sent late?

The expectation is for the Supplier to have appointed the HHDC on the date of the CoMC by virtue of BSCP502 3.3.1.1 foot note 2. If that date subsequently changes for some reason then either the appointment needs to reflect that change or the HHDC simply estimate zero for the NHH period.

We understand that some Suppliers avoid this issue by using the MRA Working Practice 66 process of only appointing the HHMOA, appointing the HHDC informally, de-appointing the NHHDC and NHHMO informally, and then only sending out the formal HHDC appointment and NHHMO/NHHDC de-appointments once the CoMC date is known. Not all Suppliers use this practice. Some appoint/de-appoint and then re-appoint/re-de-appoint if the date changes.

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

There appears to be some inconsistency with the removal dates received in D0150 removal flows as a part of a CoMC upgrade. In some cases the removal date is equal to the CoMC date, in other cases it is the CoMC date -1 day. What should be sent as the removal date on the D0150 flow?

BSCP514 7.1.19 requires that the NHHMOA re-dates the final reading to their de-appointment date (i.e. the day before the CoMC). This was introduced to cater for a constraint in NHHDC systems whereby they couldn't process readings taken after their de-appointment date (The NHHDC has to be de-appointed on COMC-1 day because the HHDC takes over on the COMC date).

In all other respects, the CoMC should be dated with the actual date. It is only the final NHH reading date, and possibly the associated meter removal, that is re-dated. HHMOA and HHDC appointments, the Effective Date of the Measurement Class in SMRS/MPAS, the HH Meter installation date should all be the actual date of the CoMC.

Metering

Are advanced Metering Systems in Profile Class (PC) 3 or 4 affected by P272?

No, P272 only applies to advanced Meters installed under the Supply Licence obligation. As the Supply Licence obligation only applies to Metering Systems in PC 5 to 8, advanced Meters installed on PC 3 or 4 do not have to change to HH settled.

How will the new obligations work for customers who opt for MC E HH Metering Systems? Will the requirements and standards of the existing HH market apply?

The obligation to settle 99% of HH energy on actual reads at each run (from SF onwards) remains in place for MC C Metering Systems. Under P300, the obligation for Metering Systems in MC E, F and G will, from 5 November 2015, be to settle 99% of energy on each Settlement Run from the R1 run onwards. However, Supplier Charges for these will apply at the RF run only.

Can we transfer CT customers to HH now, using existing MC E, rather than waiting until November 2015 and the new MCs being introduced?

You can transfer any NHH Metering System to HH under MC E at any time. However, there may be different charges applicable prior to November 2015 and the implementation of P300.

What are the timescales associated with the proving tests for CoP 10 Meters?

CP1429 has been approved on 25 June 2015 and it introduced timescales for CoP 10 Meter proving tests. Meter Operators have 15 Working Days (WDs) to complete a proving test and another 15 WDs to complete a re-test (if needed).

Will PC 5-8 Meters moving to HH need full Commissioning to meet the requirements of CoP4 for HH Meters?

All Metering Equipment is required to be commissioned in accordance with CoP4 (including NHH and CoP10 meters). There are no additional commissioning requirements for Metering Equipment moving to HH as they should already be commissioned.

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

Will Proving Tests be required for the PC 5-8 Meters moving to HH?

Proving tests became a requirement for CoP10 Meters from 25 June 2015, following the implementation of Change Proposal [CP1411](#). Change of Measurement Class is a trigger for proving, so all Metering Systems subject to P272 will need a Proving Test. These can be carried out remotely to avoid the need for a site visit.

Are there scenarios due to communications issues for which migration under P322 would be excluded? If so, are you able please to clarify what would be classified as excluded due to communications issues?

The Supply Licence Condition 12.19, which states:

For the purposes of this condition, an advanced meter is an Electricity Meter that, either on its own or with an ancillary device, and in compliance with the requirements of any relevant Industry Code:

- (a) provides measured electricity consumption data for multiple time periods, and is able to provide such data for at least half-hourly time periods; and
- (b) is able to provide the licensee with remote access to such data.

If (b) is not achieved, the Meter is not an Advanced Meter, it is just a HH capable Meter. The Meter would not be included in the P272/P322 migration requirements but the Supplier will be non-compliant with its Supplier Licence Condition.

Given the volume of PC 5-8 Meters moving to HH Settlement will the timescales for any Commissioning and Proving be extended?

There are no additional commissioning requirements for Metering Equipment migrating to HH. CP1444 is currently under assessment and it proposes to extend proving test timescales for Meters impacted by P272.

What will be the requirements under P272 for the PC 5-8 AMR Meters which are on Hand-Held reads?

There will be no change to the existing requirements; however, more frequent readings may be necessary in order to meet the Half Hourly Data Collector (HHDC) obligations.

If an existing CoP10 AMR Meter was fitted prior to the current version of CoP 10, and is compliant with a previous version, are any changes required to the Metering System to make it compliant with the current version?

No. The BSC Section L 3.2.2 sets out that the relevant CoP for Metering Equipment is that which was relevant at the time the Metering Equipment was first registered in Settlement.

If the AMR Meter was fitted prior to the implementation of CoP 10 (but is compliant due to the Meter type gaining subsequent approval), what, if any, changes are required to the Metering System?

If the installed AMR Metering Equipment complies with the current version of CoP 10 and the Meter has approved firmware, as indicated on the CoP Compliance and Protocol Approval spreadsheet on the ELEXON website, then the Metering Equipment can be registered as CoP10 Metering System.

P272, P300 & ISSUE 59 – FREQUENTLY ASKED QUESTIONS

As a HHDC will I have to make sure that I have sufficient CoP10 Protocol approvals in place for P272?

Yes. HHDCs will need to make sure that any HH Meter they collect data from is covered by a Protocol approval under BSCP 601. ELEXON publishes a list of these approvals on our website where HHDCs can see all of the HH Meters currently approved for use in Settlement along with the HHDC protocol approvals.

Could there be any issues with remote Meter reconfiguration from NHH to HH?

There is a potential risk that the communications link might fail during reconfiguration. In which case, this may require a site visit to change the Meter as a result. The probability of Meter failing during this process depends on many factors, including the design of the Meter's firmware. If there is any doubt as to how the Meter might perform under remote configuration, Meter Operators are advised to contact the Meter manufacturer.

HHDC on meters gained (Best Practice)

Once HHDCs have received MTD details, HHDCs should aim to test dial the meter prior to their appointment, as failure may result in an Automated Meter Read (AMR) site effectively being dumb.

Identification of Meters on gain and requirements associated

If you gain a meter, which you believe at the time of gain to be an Advanced Meter (and thus it is a candidate for migration under the P272/P322 obligations), you should begin the CoMC process as usual.

If, during this process, you identify that the meter is no longer classified as Advanced (for example, it is undialable), you may then remove it from your P272 'pot' and stop reporting on it as such. This Metering System should then fall under the separate Ofgem-mandated obligation in the Supplier Licence for you to fit a suitable Advanced Meter to it (either through raising a D0001 fault and 'fixing' the existing meter, or by replacing the meter), and report it to them in this category. Once an Advanced Meter is subsequently fitted, you should return it to being reported under your P272/P322 report to ELEXON. It is likely that this will now fall outside the 45WD obligation (from the original change of contract date), and it must be reported in this way. However, we would encourage you to add this context to the email with your submission, to allow ELEXON and the PAB to understand that you have made reasonable efforts to get the migration completed in the shortest possible time frame.

Data

Will PC5-8 be end dated in MDD? And therefore, will all the associated combinations be end dated?

At present, they will not be end dated. We do plan to remove PC 5-8 from MDD eventually, but have no defined timescale for this yet.

Are there exceptions that are allowed to stay with PC 5-8 after go-live? If so, how is MPRS notified of these?

NHH Export and (where applicable) UMS may remain in PC 8 after the implementation date of P272. A PC 5-8 Metering System which has not had an advanced Meter fitted would also not be required to settle HH.

