RETAIL ENERGY CODE

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CONSOLIDATED CONSULTATION RESPONSES

R0017 – INVALID REQUESTS FOR SITE TECHNICAL DETAILS

On 14 April 2023 the Code Manager issued a consultation to industry to seek feedback on the Preliminary Change Report for R0017.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSIBLE COMMITTEE	METERING EXPERT PANEL
LEAD ANALYST	ANN PERRY

DATE CONSULTATION ISSUED	14/04/2023
RESPONSE DEADLINE	08/05/2023

Question 1:	Do you agree with the proposed solution and consider that it delivers the recommendation from the BSC Issue 99 workgroup? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes, we agree with the proposed solution and that is delivers the recommendation from the BSC Issue 99 workgroup.	Noted.
IMServ (Metering Equipment Manager)	Yes, I agree with the issue 99 proposal however I do have a some concerns about the way it's being implemented, please see notes in response to question 2.	Noted – see the Code Manager's response against question 2.
Siemens (Metering Equipment Manager)	In part, objectively reducing the instances in which D0170s are to be sent will reduce the overall volume of responses required thus achieve the desired outcome behind the change however there is disagreement in the method in which this is achieved by placing the onus on the MEM to remedy a DNO issue.	The Code Manager considers that the solution put forward is the most appropriate to address the issue being experienced, as agreed at the Issue 99 Workgroup. We acknowledge this is an issue that has greatest impacts on the DNOs, however, there are expected to be benefits to the MEMs through the reduction in manual effort to resolve missing responses and rejections.
Electricity North West Limited (Distribution Network Operator)	We agree with the proposed solution. We do have a suggestion to further improve the proposed solution. The DNOs currently receive a significant quantity of D0170s through from MEMs who are not registered as the appointed MEM for the requested site. In these instances, the requesting party has requested the information before being entitled to receive it. When this occurs, we would suggest that the MEM should not receive the information until they are appointed by the customer/supplier. As currently drafted, DNOs are obliged to send this information through. We would suggest	Thank you for your feedback. We have incorporated this in the final version of the legal text and will be clarifying that only Appointed MEMs should request Site technical details.

	that the legal text should be amended to recognise that only the appointed MEMs can request the information via a D0170 and DNOs should not respond if the party is not the appointed provider.	
Northern Powergrid (Distribution Network Operator)	Yes	Noted.
ANONYMOUS	Yes, overall, we agree that the proposed solution delivers the recommendations. As a MEM we are not in favour of losing the ability to request a D0215 on CoMC or anywhere that the installation/use of Measurement Transformers occurs, however we believe that note 53 mitigates these concerns. It is worth noting here that we do not issue D0170 to DNOs on CoA.	Noted.
Scottish Power (Metering Equipment Manager)	Yes, for NHH metering but not for HH metering. As a MEM, and in line with the P283 process, it is imperative that for all new connections that we receive the correct CT/VT ratios from the LDSO, via either the D0215 or D0383 flows. This supports the accurate installation and commissioning of the metering system, as well ensuring that we are able complete our obligation to issue accurate MTDs to the Supplier. As proposed, we would not receive this information until the D0383 is received after the meter installation	The solution does allow the requesting of Site technical details, where this is required by the MEM.

Question 2:	Based on feedback received during the impact assessment, the Code Manager has made updates to the proposed legal text changes. These have been made to simplify the solution and present the redlining in a cleaner way. Do you agree that the changes achieve the desired outcome? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree that the changes that have been made to the red-lined legal text make the solution much clearer and still achieve the desired outcome.	Noted.

IMServ (Metering Equipment Manager)	Regarding 6.6.2 It says this is an optional step for Supplier Serviced Metering Assets, yes this is correct, however it's also optional for all other types of metering. If the entire step is optional, so why single-out Supplier Serviced SMETS meters? Regarding footnote 18 This step has been deleted, however I am still expecting the LDSO to send an updated D215 if they make changes to a metering system, for example change to the CT ratios on a NHH metering system (scenario is not covered by the D0383). Do you agree/disagree that there's still a requirement for LDSO to proactively send D0215s if they make a change to a metering system? Regarding footnote 53 This suggests that there's only one valid scenario where a MEM can actively send a D0170 to the LDSO i.e. 'if Measurement Transformer Ratios and Class details have not been received'. Looking at this in more detail, I believe there are at least four scenarios where a MEM might need to send a D0170 to the LDSO i.e. 1) Missing MTDs – the MEM didn't receive the MTDs from the previous MEM 2) The MEM has MTDs but the CT/VT ratios are populated with Unknown/Unknwn 3) MTDs are present, but the MEM suspects the measurement transformer ratio(s) are missing (i.e. it looks like a WC meter) 4) There are concerns regarding the accuracy of the CT/V ratios held i.e. the MEM holds values, but needs to obtain a D0215 from LDSO to validate the information. If Schedule 14 quotes one specific scenario, could this deter MEMs from sending D0170s for other valid scenarios?	Thank for you the feedback. We have updated 6.6.2 to reflect your comments. We agree that this adds no value as this step is optional for all types of metering. There are obligations for DNOs to provide updates to MEM on changes to the meter, such as Energisation, Meter Removal and when Metering Assets have been replaced by DNOs. We have updated footnote 53 in response to you feedback, we agree that there are more scenarios where it is appropriate for a MEM to request Site technical details, however, we have not specified the exact situations where it would be required as this may be too constraining.

Siemens (Metering Equipment Manager)	Yes, the legal text updates will address the problem statement. It is not known the % decrease from detail shared but it will result in MEMs sending fewer D0170s as the proposal is currently written.	Noted.
Electricity North West Limited (Distribution Network Operator)	We agree.	Noted.
Northern Powergrid (Distribution Network Operator)	Yes	Noted.
ANONYMOUS	Yes	Noted.
Scottish Power (Metering Equipment Manager)	Please see response to Q1	Please see the Code Manager's response against question 1.

Question 3:	As a MEM, if your process for the sending of the D0170s is automated, will your organisation update or switch off this automation as part of the implementation of the Change Proposal? Please provide the rationale for this approach	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	N/A	Noted.
IMServ (Metering Equipment Manager)	Yes, we will switch-off the automation we have for New Connections and CoMC's, we see no value in automaticity sending D0170s to LDSO under these circumstances. Our aim will be to only send Adhoc D0170s to LDSO for investigation purposes.	Noted.

	The point of this change is to reduce unnecessary D0170/D0215 traffic, if MEMs carry on sending D0170s at the same rate then the change will have failed to deliver the desired result. Possibly the red-line text is lacking in this area and may leave the door open for MEMs to carry-on as they are, is this a concern which needs to be managed?	
Siemens (Metering Equipment Manager)	D0170s are sent automatically in response to certain industry defined events (gains, etc). At this stage it is believed that the automated process will be updated to align to new requirements.	Noted.
Electricity North West Limited (Distribution Network Operator)	N/A	Noted.
Northern Powergrid (Distribution Network Operator)	n/a	Noted.
ANONYMOUS	We would always look to update automation to match new rules rather than switch automation off. Switching automation off hugely increases the FTE interaction which isn't practical. In addition to any updates, we will also introduce the ability to issue an ad hoc D0170.	Noted.
Scottish Power (Metering Equipment Manager)		

Question 4:	Do you agree with the proposed implementation date and implementation technique? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution	Yes we agree with the proposed implementation date and implementation technique on condition that it aligns with the dates of	Noted.

(Distribution Network Operator)	the associated BSC change and ensure the consultation of the REC and BSC Change Proposals remain aligned.	
IMServ (Metering Equipment Manager)	Yes	Noted.
Siemens (Metering Equipment Manager)	Yes, this change ought to be deliverable by 3rd November 2023 from details shared.	Noted.
Electricity North West Limited (Distribution Network Operator)	We agree with the proposed implementation date.	Noted.
Northern Powergrid (Distribution Network Operator)	Yes	Noted.
ANONYMOUS	Yes	Noted.
Scottish Power (Metering Equipment Manager)	Please see response to Q1	Noted.

Question 5:	Do you agree with the Code Manager's assessment of the case for change? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the Code Manager's assessment of the case for change.	Noted.
IMServ (Metering Equipment Manager)	Yes	Noted.

Siemens (Metering Equipment Manager)	No, the assessment frames a DNO workflow management issue as a MEM (D0170 sender) issue as the subject of this change. This results in MEM effort to improve processes for DNO. This results in MEM effort for no MEM benefit.	The issue and the proposed solution have been the subject of an industry work group under the BSC, at which MEMs and DNOs were represented. The REC was also represented at this group and we agree that the proposed solution is the most appropriate way to address the problem statement. The intention of this Change Proposal is to reduce the volume of unnecessary D0170s sent from MEMs to DNOs, by reflecting that requesting Site technical details is not required in all circumstances. The benefits of this change will be greater for DNOs, however, there may be benefits seen by MEMs through the timelier resolution of necessary D0170 requests or a reduction in manual effort to resolve missing responses and rejections.
Electricity North West Limited (Distribution Network Operator)	We agree with the assessment.	Noted.
Northern Powergrid (Distribution Network Operator)	Yes	Noted.
ANONYMOUS	Yes	Noted.
Scottish Power (Metering Equipment Manager)	Please see response to Q1.	Noted.

Question 6:	Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 03 November 2023? If not, please explain why?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	Yes we agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 3rd November 2023, on condition that it aligns with the dates of the associated BSC change and ensure the consultation of the REC and BSC Change Proposals remain aligned.	Noted.
IMServ (Metering Equipment Manager)	Yes	Noted.
Siemens (Metering Equipment Manager)	Yes, there is sufficient time to make this change.	Noted.
Electricity North West Limited (Distribution Network Operator)	We agree.	Noted.
Northern Powergrid (Distribution Network Operator)	Yes	Noted.
ANONYMOUS	Yes	Noted.
Scottish Power (Metering Equipment Manager)	Please see response to Q1.	Noted.

Question 7:	Do you have any other comments relating to this Change Proposal?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
National Grid Electricity Distribution (Distribution Network Operator)	We are supportive of the work being undertaken in the BSC Issue 99 work group and believe that amendments to the Data Flows under the BSC will ensure that the D0215 flow is only requested where there is value in having it.	Noted.
IMServ (Metering Equipment Manager)	Regarding 2.32. There are two different values used by a MEM when CT and/or VT ratios are not known. For VT ratios its: UNKNOWN (J0455 is a 10 CHAR field) For CT ratios its: UNKNWN (J0454 is a 6 CHAR field) I suspect the incorrect spelling of unknown was actually deliberate, possibly the paragraph should mention both spelling variations.	Thank you for this feedback. We have amended the legal text to reflect this.
Siemens (Metering Equipment Manager)	Yes: 1. I assume that instances where a D0170 is required but it's rejected by DNO (e.g 6.6.2 - 6.6.4) does not require chasing if outside of the X working day window? 2. Going forward reviews would be easier if the same formatting was used as with the Elexon documents. By this I mean where there is a change the R number is alongside that change so searching the unique change ID will bring back every change impacted in the redlining. 3. Also having footnotes in the text link to the relevant notes in the footer would make for easier document navigation, this may be an issue with the redline document only.	Thank you for your feedback. The change made to 6.6.2 does not introduce any obligations on MEMs to chase for a D0382 rejection. We will review how we can make the presentation of the changes to the legal text easier to identify.
Electricity North West Limited (Distribution Network Operator)	Please see our response to question 1. We will be sending through the same comments to the BSC.	Noted.

Northern Powergrid (Distribution Network Operator)	No	Noted.
ANONYMOUS	Having reviewed CP1574 we do not believe the proposed solution matches with R0017 and in our view CP1574 introduces far more risk than R0017. In the redlined version of BSCP515, • 3.3.3 is removed completely not allowing for the request of a D0215 in installations in HH, • 3.11 is removed, again not allowing for installations/reconfigures in HH and, • note 7 states Following a Change of Supply or Change of Agent (and only for MSIDs first registered after 6 November 2008), the new SVA MOA may request "D0215 – Provision of Site Technical Details" from the LDSO where Meter Technical Details have not been received from the old SVA MOA, or those Meter Technical Details have missing or "unknown" measurement transformer ratios. The LDSO shall respond with the D0215 or the "D0382 – Rejection Response for Request to LDSO for Site Technical Details" within 5WD. This seems at odds with Schedule 14 footnote 53.	Thank you for your feedback. This has been passed through the Elexon for consideration and reflection through changes to the BSC draft legal text.
Scottish Power (Metering Equipment Manager)	None	Noted.