RETAIL ENERGY CODE

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NON-CONFIDENTIAL CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0017 – INVALID REQUESTS FOR SITE TECHNICAL DETAILS

On 13 January 2023 the Code Manager issued an impact assessment to industry.

The purpose of this document is to consolidate the responses, ahead of publication of the Preliminary Change Report.

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RESPONSIBLE COMMITTEE	METERING EXPERT PANEL
LEAD ANALYST	ANN PERRY

DATE IMPACT ASSESSMENT ISSUED	13/01/2023
RESPONSE DEADLINE	03/02/2023

Question 1:	Do you agree that the draft legal text answers the problem statement, and will reduce the volume on D0170s requesting site technical details which are not required? If no, please provide rationale
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	It is unclear that the draft legal text fully answers the problem statement without having sight of the "aligned BSC change" that is mentioned in the change proposal summary. The change proposal states "Major changes have been made to the interface table in sections 6.6.2 to 6.6.14. These are intended to alter the process for the installation of a meter (HH or NHH) to show that a D0170 requesting site technical details is not required in all circumstances" I am unclear what the "major changes" are. The legal text here has removed the sections 6.6.2 to 6.6.4 which relate to the sending of a D0170 to request Site Technical Details, the D0382 to reject the request and the D0215 to provide Site Technical Details as the process for requesting, rejecting and accepting Site Technical details is covered under the BSC. Is the intention that the changes to the BSCP 515 will result in showing "..that a D0170 requesting site technical details is not required in all circumstances"?
Northern Powergrid (Distribution Network Operator)	We believe the draft legal text should reduce the volume of D0170s as long as the Meter Operators make the necessary changes and only request the MTD when it is genuinely required.
Scottish Power (Metering Equipment Manager)	Yes.
UK Power Distribution (Distribution Network Operator)	Yes.
Scottish Power Energy Networks	Yes

(Distribution Network Operator)	
IMServ (Metering Equipment Manager)	Yes, we agree with the proposed changes.

Question 2:	Do you have any comments on the proposed legal text?
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	The red-lined legal text requires the following amendments 6.6.7 Immediately following 6.6.~~9~~ 6 or 6.6.~~11~~ 12 If response is “Accepted”, proceed to 6.6.~~12~~ 9, otherwise proceed to 6.6.~~11~~ 8 6.6.8 Within 5 WDs of 6.6.~~10~~ 7 Proceed to 6.6.~~10~~ 7 6.6.10 Missing text The Electricity Supplier will ensure that only the latest version of the configuration for the day is sent to the MEM

	If the Supplier is unable to configure the meter (for example, due to a communications failure), the SSC and TPR will be defaulted to a single-rate default. The TPR should be mapped to the total Import register. The red-lining is also overly complex. Essentially the redlining is to amend two sections to reference the BSC process and then "remove" sections 6.6.2 to 6.6.4 However instead of removing these sections and re-numbering the subsequent sections, the red-lining has elected to amend every subsequent section process step narrative making the red-lining appear overly complex.
Northern Powergrid (Distribution Network Operator)	N/A
Scottish Power (Metering Equipment Manager)	None
UK Power Distribution (Distribution Network Operator)	No
Scottish Power Energy Networks (Distribution Network Operator)	None
IMServ (Metering Equipment Manager)	None

Question 3:	Will your organisation incur any costs to implement the proposed solution? If yes, please provide an explanation of these as well as the rough order of magnitude.
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution	As stated previously, without sight of the proposed BSC change it is unclear what changes will be required to implement the proposed solution.

(Distribution Network Operator)	
Northern Powergrid (Distribution Network Operator)	N/A
Scottish Power (Metering Equipment Manager)	None
UK Power Distribution (Distribution Network Operator)	No
Scottish Power Energy Networks (Distribution Network Operator)	We do not believe that there would be any cost incurred to us of implementing this change. We would benefit in the reduction of incoming invalid flows that need to be checked, allowing us to focus on the valid ones.
IMServ (Metering Equipment Manager)	We may need to look at switching-off automation which automatically triggers D0170s to DNO for New Connection jobs. It's not known how much effort is required to achieve this, although we expect it's a relatively small task. We also need to consider working instructions and training, again we think it's a relatively small task.

Question 4:	How long will it take your organisation to implement the proposed solution? (What lead time will be required?)
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	As stated previously, without sight of the proposed BSC change it is unclear what changes will be required to implement the proposed solution.
Northern Powergrid (Distribution Network Operator)	N/A

Scottish Power (Metering Equipment Manager)	None
UK Power Distribution (Distribution Network Operator)	It will be instant as no changes to our systems are required.
Scottish Power Energy Networks (Distribution Network Operator)	We do not anticipate any changes to core systems or processes as the checking of these flows is a manual process for us.
IMServ (Metering Equipment Manager)	Assuming there are no changes the D0170/D0215 flow structure, then 3 months would be acceptable.

Question 5:	As a DNO, how many invalid requests for site technical details do you receive in a month? (or other timeframe as you are able to provide)
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	We received D0170s on average 860 – this is the number of data flows but does not represent the number of MPAN requests contained within each data flow. If this information is needed this would require further resource from our IT department to gather the data. Approximately 12% of the D0170s received have an operational value. The majority of the D0170 requests received are for domestic MPANs and therefore the operational value is very low.
Northern Powergrid (Distribution Network Operator)	During 2022 we rejected 33.5k requests circa 2.8k per month. In comparison, we responded to 16.7k requests circa 1.4k per month.

Scottish Power (Metering Equipment Manager)	Not Applicable
UK Power Distribution (Distribution Network Operator)	We have received around 100 in the last month which is significantly more than previous months.
Scottish Power Energy Networks (Distribution Network Operator)	We have seen volumes decrease over the last year. We believe that this is as a direct result of the reduction of Change of Supplier in the market due to the current price challenges. We have provided additional figures from periods before this as we do not believe that recent figures are representative. March to May 2022 – Average monthly figure 1,373 2021 – Average monthly figure 13,000 2020 – Average monthly figure 13,000 In our analysis less than 10% are of requests are valid.
IMServ (Metering Equipment Manager)	N/A

Question 6:	As a DNO, what FTE and other resource to you have to expend in the investigation of invalid requests for site technical details? Please provide costs, and breakdown.
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	The vast majority of requests received are auto-processed either by providing the details in a D0215 flow or if the site technical details are not held against the MPAN, a further check is done against the MPAN creation date and any raised prior to 06/11/2008 are auto-rejected and a D0382 flow sent. A very small number may require manual processing – this number has never been high but over recent months has decreased even more.

Northern Powergrid (Distribution Network Operator)	On average its takes 1 / 1.5 hours a day to process all meter technical requests via our automated process and deal with exceptions manually. Prior to the implementation of our automated process, it required 1 FTE although where high volumes were received relating to a bulk change of agent this could be anything up to 6 FTE with many responses not meeting the 5 working day timescales due to the sheer volume.
Scottish Power (Metering Equipment Manager)	Not applicable
UK Power Distribution (Distribution Network Operator)	This has taken up a couple of hours work in the last few months but we have a relatively small portfolio at the moment.
Scottish Power Energy Networks (Distribution Network Operator)	Based on 2020/2021 figures, before the reduction on COS activity this equated to an FTE equivalent of 0.2FTE, and some additional IT support costs. This equates to approx. £20k PA. Although the costs are not significant, the resource time could be better spent on other BAU activities.
IMServ (Metering Equipment Manager)	N/A

Question 7:	As a MEM, do you experience any delays in the response to valid D0170s requesting site technical details?
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	N/A
Northern Powergrid (Distribution Network Operator)	N/A
Scottish Power (Metering Equipment Manager)	Yes, we can and do experience delays to valid requests.

UK Power Distribution (Distribution Network Operator)	N/A
Scottish Power Energy Networks (Distribution Network Operator)	N/A
IMServ (Metering Equipment Manager)	Not that we have noticed, currently for the majority of D0170s we send as MEM, we are not monitoring the timeliness of the responses.

Question 8:	Do you have any other comments on impacts to your organisation related to this issue?
RESPONDENT DETAILS	**RESPONSE**
National Grid Electricity Distribution (Distribution Network Operator)	Whilst we are unclear as to whether this REC CP will address the problem statement, 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.
Northern Powergrid (Distribution Network Operator)	N/A
Scottish Power (Metering Equipment Manager)	None
UK Power Distribution (Distribution Network Operator)	No

Scottish Power Energy Networks (Distribution Network Operator)	No further comments
IMServ (Metering Equipment Manager)	No further comments