QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
1. Do you agree with the proposed solution? If not, please explain why?	EON/Npower Energy Supplier	We agree with the proposed solution	• Parties agree with the proposed solution
	IMServ Data Collector	Yes, an improved form will increase the likelihood of accurate data entering Settlement and may also reduce errors/queries/correction of data/disputes and reduce the overall effort of supporting Complex sites.	
	IMServ MEM	Yes	
	Siemens MEM	Yes, standardising forms and mandating them will improve processes by reducing uncertainty/ambiguity.	
	Scottish Power MEM	Yes, we agree with the proposed solution.	
2. Do you agree with the proposed implementation date and implementation technique? If not, please explain why?	EON/Npower Energy Supplier	We agree with both the implementation approach and dates proposed.	• Parties agree to the proposed implementation date
	IMServ Data Collector	Yes	
	IMServ MEM	Yes	
	Siemens MEM	Yes, time to release seems reasonable given the change size.	
	Scottish Power MEM	Yes, we agree with the proposed implementation date and implementation technique.	

3. Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Metering Expert Panel?	EON/Npower Energy Supplier	We agree with the code managers assessment that this Change Proposal should be subject to Self-Governance approval	• Parties agree with the Code Managers assessment of the Change Path
	IMServ Data Collector	Yes	
	IMServ MEM	Yes	
	Siemens MEM	Yes	
	Scottish Power MEM	Yes, we agree	
4. Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation on 04 November 2022? If not, please explain why?	EON/Npower Energy Supplier	It is sensible to align the implementation with BSC CP 1559 implementation to ensure that the CSSIF changes align across all impacted market participants, therefore we agree with the code managers recommended implementation date.	• The REC Change is aligned to BSC CP 1559 • Parties agree with the Code Managers recommended implementation date of 04 November 2022
	IMServ Data Collector	Yes	
	IMServ MEM	Yes	
	Siemens MEM	Yes, discussing and planning industry change to aligning to a new CSSIF form and adding an additional check against Aggregated Outputs seems doable in 10 months.	
	Scottish Power MEM	Yes, we agree	

5. Do you have any other comments relating to this Change Proposal?	EON/Npower Energy Supplier	Whilst we are supportive of the proposed changes to the CSSIF it is our opinion that some content of the CSSIF could be better improved if it was moved to an auxiliary dataflow that aligns to the expectations and SLA's for receipt and exchange of the D0268 dataflow, as that will ensure that all of the information parties require to service, read and disseminate metered data into correct settlement data occurs in a timely fashion with the data exchange methods aligned. We note at this time the CSSIF and complex site arrangements are generally put in place for a small number of HH metering systems across industry which at this time justifies not moving the CSSIF into a dataflow, however we believe that the use of CSSIF is likely to increase both as a consequence of the improvements that this change offers but also to facilitate bespoke arrangements that will arise on the path to the net zero.	• This could be something to look at in the future if a Change Proposal was raised.
	IMServ Data Collector	The CSSF form – Whilst we agree that the new CSSIF is a considerable improvement, we question the value of some of the data items it contains. They would add no value to improving the overall process and could be unnecessarily burdensome on the MOA. Specifically, we see no value in the MOA informing the HHDC the values of the following data items:	• All fields are mandatory in the CSSIF form. It is filled in by the MEM and shared with multiple Parties there might be data shared that some do not need. If that happens then the data not needed can be ignored.

		Supplier Distributor Boundary Embedded Indicator (Should this be Boundary/Embedded Indicator) if it were to be included Metering Dispensation Ref Method of Compensation (where applicable) Smart Meter Indicator These are all irrelevant to the HHDC or would already be known by the HHDC. We would not reject the form as invalid if these fields were not completed. Are all the fields on the form mandatory if applicable? If not, could the mandatory and optional fields be denoted somehow? Completion of the 'Associated MSID/MPANS' and 'Import/Export Indicator' should always be mandatory if applicable in our view. We note that this Consultation does not specifically mention Reactive data. Our current practice is to apply the mapping rule for Lag and Lead if a specific rule is included on the CSSIF, else, where Lag and Lead are defined on the D268, then aggregate this as we would for none Complex sites. That is to say, sum up all Lag channels (excluding check channels), submit this and the same for all Lead channels.	• Costs and Effects on any parties impacted are requested as Impact Assessment Phase. • Reactive Energy Data is a requirement of the BSC CoPs however it is not used for Settlement (it's used by LDSOs to calculate DUOS Charging). There is no requirement under the BSC to include Reactive Energy mapping in a Complex Site Supplementary Form (as Settlement isn't concerned with Reactive Data) but the CSSIF does not prevent MOAs doing so if they wanted to.

		Does REC agree with this approach and if so, such guidance should be added into REC? The above comments have also been included in my response to the Elexon Change Proposal. Shouldn't this response form also be seeking to find out the costs and effects on any parties impacted? For example, while I might agree that a change is a good idea it may be cost prohibitive to implement or simply not a priority to implement. Such views should be sought across the board surely.	
	IMServ MEM	None	
	Siemens MEM	Yes, the redlined REC (section 20.15.4) states this change is to 'Validate metered volumes' whereas the change defined in the redline BSCP502 (section 20.15.4) states 'Validate Metered Volumes AND Aggregated Output of Complex Site Rule'. I'd expect these two to align as the change is the same.	• Update will be made to the Metering Operation Schedule redline document to align with BSCP502.
	Scottish Power MEM	None	