

## Representation

### Draft Modification Report

#### 0487S - Introduction of Advanced Meter Indicator and Advanced Meter Reader (AMR) Service Provider Identifier in advance of Project Nexus Go Live

**Consultation close out date:** 08 October 2014

**Respond to:** enquiries@gasgovernance.co.uk

**Organisation:** EDF Energy

**Representative:** John Costa

**Date of Representation:** 08 October 2014

#### Do you support or oppose implementation?

Oppose

#### Please summarise (in one paragraph) the key reason(s) for your support/opposition.

We support the intent of the modification but do not believe that implementation in its current form and time left before Project Nexus is implemented furthers the relevant objectives for the following reasons below. We also note that the proposer has recently raised on the 6<sup>th</sup> October 2014 a variation to this modification to include a post-Nexus solution also, something that was originally part of their other modification UNC0511 - Introduction of an Enduring Solution for managing Advanced Meters in central systems post Nexus.

The modification proposes to introduce an ASP (Advance Metering Provider) Identifier in central systems and an obligation on Shippers where relevant to populate and maintain it prior to Project Nexus (1 October 2015). It is clear from the SPAA Change Proposals that Xoserve plan to use the SMSO (Smart Metering System Operator) field to implement this as a quick workaround. This field was not designed for this function and we fundamentally do not agree with the use of an existing field to hold a different data item as apart from setting a bad precedent it impacts on our systems and processes we are currently developing for the delivery of Smart. We use this SMSO data item to trigger key activities under our Smart Meters programme and believe using it in this way will affect our Smart delivery programme. Further, it is not clear whether or not an SMSO can also be an AMR provider. If this is the case it breaks this model. It would be more robust to use a new organisation code to hold the AMR provider as an enduring solution but believe due to resource and system constraints this can not be delivered by Xoserve before Nexus.

We would need at least 6 months to analyse and develop a tested solution to implement this modification while also assessing the impact on our Smart programme implementation. This is a timeline highlighted by other suppliers. We therefore believe the impact is material and depending on whether this modification is given self-

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governance in light of the recent modification variation, it might only be implemented in April or May at the earliest, leaving little time before project Nexus goes live on the 1<sup>st</sup> October 2015 which will have AMR functionality.

The modification says that it recognises that hundreds of thousands of Advanced Meter Reading installations are already in situ. There is no reference to where this information has been sourced, however if this data is correct then there could be a number of file rejections where Users have not been able to comply in time and who will rely on a manual workaround when and if they receive such customers. It is not therefore clear how many sites would be captured before project Nexus and thus the benefits of this proposal. It would be more efficient and effective if the industry agrees as a whole when a proper solution and delivery date can be attained. For example it might be better use of industry's time in these next 6 months for all suppliers to inform Xoserve of their sites which have AMRs which Xoserve could populate their systems with ready for 1<sup>st</sup> Oct.2015.

In summarising, we support the principle of modification 487s however we do not believe this is an efficient way of delivering a change to systems and processes before Project Nexus goes live on the 1 October 2015. We believe it would be more efficient to focus time and resource on the proposer's other modification 511 for a post Nexus solution which will deliver a more robust and long-term arrangement to AMR meter identification. Implementation of this modification in the mean time will only distract necessary IT system development and processes from delivering many industry changes, many of which relate to Project Nexus. However, we note that this enduring solution is now part of the variation raised by the proposer. This will need further thought and we would recommend to the panel that this modification goes out for consultation again if the variation is accepted and a different solution is developed in further workstream discussions.

**Modification Panel Members have indicated that it would be particularly helpful if the following question could be addressed in responses:**

*Q1: "Respondents to indicate, recognising the solution only applies pre nexus, their expected systems implementation lead time for this modification should it be implemented, to help Panel consider the merits of this modification."*

If the chosen solution would be to use the SMSO field to flow the ASP via an automated solution then the lead time for this could be a minimum of 6 months given it would require systems and processes analysis, changes and testing. Any other automated solution or further changes to Xoserve's systems from an enduring solution impacting on ours would take longer than 6 months.

**Are there any new or additional issues that you believe should be recorded in the Modification Report?**

We would like the mod to confirm what is intended by the term "ASP identifier" and for this to be defined in the modification - i.e. does this mean a new organisation and if so does using the SMSO id meet the requirements of the modification?

Also, we understand that customers can have AMR devices installed without informing the supplier or MAM and we therefore

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have concerns how this data will flow through from MAM to supplier on to GT when the MAM may not be aware of the installation.

Finally there is no mention of the impact on or solution for IGTs whose sites may have AMRs fitted. Given that project Nexus will cover all Gas Transporters we believe this is another reason to aim for a robust solution for project Nexus go-live.

### **Self Governance Statement:**

*Do you agree with the Modification Panel's decision that this should be a self-governance modification?*

No. Given the material impacts on systems and processes highlighted above alongside the number of currently installed AMR meters claimed to be installed there is clearly an impact on consumers given the little or short-lived benefit of this modification.

Also, now that the proposer has raised a variation to make the enduring solution part of this modification this will require more work and analysis to develop a more robust long-term solution which may be material.

### **Relevant Objectives:**

*How would implementation of this modification impact the relevant objectives?*

If this proposal reduces the number of abortive site visits then we can see how it might facilitate relevant objective A11.1(d) competition amongst suppliers as stated in the DMR. However this has to be weighed up against the inefficient costs incurred from suppliers changing their systems and processes for a workaround which apart from being a short-term solution may impact on other system developments in readiness for Project Nexus or UNC511 as highlighted above. This will negatively impact objective F, Promotion of efficiency in the implementation and administration of the Code, with changes to Code when an efficient solution has not been effectively developed and agreed. Therefore we do not believe that it better meets the relevant objectives.

### **Impacts and Costs:**

*What analysis, development and ongoing costs would you face if this modification were implemented?*

It is not clear what our exact costs of implementing this are however we believe they would be significant compared to the short-term benefits of having this proposal implemented for a few months before Project Nexus is implemented. Also, it is not clear that a more efficient and robust solution will not be identified through development of UNC511 that would see 487s solution obsolete with 6 months. We therefore urge that these two proposals are considered together where possible.

### **Implementation:**

*What lead-time would you wish to see prior to this modification being implemented, and why?*

As stated above we believe a minimum of 6 months lead time would be needed for the complete and tested implementation of this proposal.

### **Legal Text:**

*Are you satisfied that the legal text will deliver the intent of the modification?*

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Yes

**Is there anything further you wish to be taken into account?**

*Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.*

No