

## DIF 69 – Incorrect GSP

### COLLATED RFIRESPONSES WITH WORKING GROUP COMMENTS

Company	Confidential/ Anonymous	1. How many examples of MPANs being created on the wrong network or set up on the wrong GSP Group have you had in the last 24 months (01 November 2021 to 31 October 2023 split by GSP Group?	Working Group Comments
UK Power Networks	Non-Confidential	N/A	Go back to confirm why the response N/A
Electricity North West Limited	Non-Confidential	N/A	Go back to confirm why the response N/A
SSE Energy Supply Ltd (SSE Business Energy)	Non-Confidential	We have not seen any examples of this in the last 24 months.	0
SP Energy Networks	Non-Confidential	N/A	Noted
Centrica	Non-Confidential	We have received 6 all for one DNO	The Centrica SG member stated that there are 60 examples in SDEP across 5 DNO MPIDs. Majority were res but some SME/I&C.
Scottish Power	Non-Confidential	We have identified 464 Post Codes where initially the GSP was set up incorrectly by the DNO, and where a correction was required impacting 13,159 MPANs. This is one example. We believe there are other examples of this, but this is an example that we have available.	13k MPANs across 464 post code areas. Notes there are likely more but unable to verify.
BUUK	Non-Confidential	N/A	Noted

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Working Group Conclusions: Agreed that need to establish where these requests are coming from and why. Also establish if we want to have distributors to respond to this question as it tends to be the distributor that drives the issue.

Company	Confidential/ Anonymous	2. Could you please provide some examples of the impact/issues caused? For example, was it due to an incorrect GSP or an incorrect DNO/ IDNO being assigned? For each example, what were the impacts on you as a Supplier and the customer involved both in cost and size of the customer? (For example, administrative tasks, impact on costs for the customer). If the impact is unknown, please state 'unknown' in the response.	Working Group Comments
UK Power Networks	Non-Confidential	N/A	Noted
Electricity North West Limited	Non-Confidential	N/A	Noted
SSE Energy Supply Ltd (SSE Business Energy)	Non-Confidential	Unknown	Noted
SP Energy Networks	Non-Confidential	N/A	Noted

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Centrica	Non-Confidential	<p>These requests are received via The Secure Data Exchange Portal (SDEP) and although the volumes are minimal they do take up a lot of resource and time to be able to amend.</p> <p>We are required to close the customer account on the old MPAN and register and set up the customer on the new MPAN. Any closing/opening bills, welcome packs etc need to be suppressed. Manual intervention is required to ensure customer billing is correct. Depending on the circumstance's tariffs will be different or the current tariff being billed may no longer be available.</p>	<p>Received via SDEP and can be time consuming to correct.</p> <p>Requires closing the existing account and setting up a new one. Customers tariffs usually need updating.</p>
Scottish Power	Non-Confidential	<p>If the GSP is wrong, we get rejections from MOAs who have been incorrectly appointed. We appoint MOAs based on the GSP associated to each MPAN. Correcting these issues can be complex and time consuming. However, we have not quantified the time and resource implications involved in correcting these issues.</p>	<p>Rejections received from MOAs are received and correcting these can be time consuming.</p>
BUUK	Non-Confidential	N/A	Noted
<p>Working Group Conclusions: To correct the issue it can be very time consuming, almost impossible to correct without customer engagement.</p> <p>It was also noted on the WG that there are currently large impacts to settlement which will become worse once MHHS becomes live as the window to correct for MPANs will reduce from 14 months to 4 months.</p> <p>It was noted by a supplier on WG that the process is very manual which creates risks as the issue is very complex to resolve and things can be easily missed. It also involves a lot of other 3<sup>rd</sup> party agents involvement.</p> <p>It was also noted by a supplier WG member that the customer often only has the supplier to speak to who takes the brunt of the customers frustration.</p>			

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Company	Confidential/ Anonymous	3. What are your views on the solution touched on in paragraph 2.5 of this RFI?	Working Group Comments
UK Power Networks	Non-Confidential	We do not believe that the proposal to refence a national postcode lookup to identify the Network Operator is appropriate. There will always be instances where two DNOs both have properties on the same postcode, as well as IDNOs (or DNOs operating Out of Area) which can be located anywhere in the country, this can also change on a frequent basis.	2 DNOs can have properties on the same post code so the solution isn't fit for purpose.
Electricity North West Limited	Non-Confidential	We understand that postcodes can be input on the ENAs website to identify DNOs but do not believe this would identify the IDNO embedded in host DNO networks. Maybe this can be revisited once specific examples of the issues have been collated.	Wouldn't identify embedded IDNO MPANs.
SSE Energy Supply Ltd (SSE Business Energy)	Non-Confidential	This solution would not achieve a resolution as noted within the paragraph, a post code could sit over 2 GSP's.	Solution wouldn't work as a post code can sit over 2 GSPs
SP Energy Networks	Non-Confidential	We believe that a central repository of postcodes would be useful to all Industry participants, however we note that there is the possibility of one postcode being utilised by both DNO and IDNO and as such we believe that information would need to be held that indicated both. We are of the view that this would require further investigation as to how a repository of this nature would work in practice, especially as this information would be required at the beginning of the connections process when the full postcode may not be available.	Could be useful however notes that DNOs and IDNOs can both be using the same post code.

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EDF	Confidential	We agree that a central source of post codes mapped to DNO region would be useful, though as mentioned, some post codes can be over two DNO regions.	Could be useful however notes that DNOs and IDNOs can both be using the same post code.
Centrica	Non-Confidential	<p>We would support the solution if this will prevent these situations occurring.</p> <p>As a Supplier we are unaware of what validation is carried out before allocating the GSP to an MPAN. It would appear that the front end process of allocating the GSP needs to be reviewed. We would suggest that there needs to be some ownership of this issue from the relevant DNO to inform the customer of the problem and communicate what actions are being taken to resolve the issue. Compensation to both the customer and the Supplier impacted would be appropriate.</p>	
Scottish Power	Non-Confidential	The solution proposed will mitigate the issues to an extent. A central source of post codes will result in suppliers using the same information. However, it will not prevent the issues from occurring in the first place	
BUUK	Non-Confidential	Proposed solution 2.5 doesn't take into account IDNO variable presence across regions.	
<p>Working Group Conclusions: One supplier WG member suggested the following solution 'Instead of using a new postcode lookup we could use the data already within EES could be to offer a new postcode search which would return counts of the number of MPANs/GSP within the postcode. A result of 1 GSP would indicate any new MPAN being created in that postcode is almost certainly in that GSP'.</p> <p>It was noted that it is possible for a postcode to have both DNO and IDNO MPANS.</p>			

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It was also noted that there would need to be some form of compensation pay to suppliers to recover costs for resolving the issue.

It was also suggested that it may be more appropriate for the distributor to send the initial set of coms to the any impacted customers on what has happened with maybe some generic guidance that the supplier will be required to take some actions to resolve and will be in touch.

Company	Confidential/ Anonymous	4. Do you have any other proposed solution?	Working Group Comments
UK Power Networks	Non-Confidential	No	Noted
Electricity North West Limited	Non-Confidential	Without specific examples of the issues being encountered it is difficult to look at solutions.	Noted
SSE Energy Supply Ltd (SSE Business Energy)	Non-Confidential	No, it is difficult to define a solution where there are no working examples of this issue happening.	Noted
SP Energy Networks	Non-Confidential	We have not identified any other solution at this point.	Noted
Centrica	Non-Confidential	Review process for allocating GSP and improve validation.	
Scottish Power	Non-Confidential	We think a solution to this issue needs to come from DNOs/IDNOs. It's not an issue that the supplier can resolve.	Solution needs to be DNO/IDNO led

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BUUK	Non-Confidential	No comment	Noted
<p>Working Group Conclusions: It was suggested maybe a guidance document to support DNOs/IDNOs in setting up GSPs would be helpful. It was noted that it would difficult to codify the issue to fully resolve the issue although some must do steps may help if they were put into code.</p> <p>It was raised that ECOES/EES could be a potential as previous noted in the conclusions to Q3.</p> <p>Highlighted that a root analysis piece may be helpful.</p>			

Company	Confidential/ Anonymous	5. Any other comments?	Working Group Comments
UK Power Networks	Non-Confidential	No	Noted
Electricity North West Limited	Non-Confidential	Examples will be very useful considering ENWL only has one GSP	
SSE Energy Supply Ltd (SSE Business Energy)	Non-Confidential	It would be extremely unlikely that a supplier would be the root cause of this issue and although we understand what the proposer is trying to achieve, we do not believe there would be a need for a new process to be developed where it is likely that this would not happen. We would like to note though, that under the old MRA MAP04 process, retrospective manual amendments, a process is clearly defined, and we believe that should the proposer wish to pursue this issue and a solution, this should be taken to the BSC	The WGs thoughts were that this may be an issue that the REC could help with.

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SP Energy Networks	Non-Confidential	No other comments	Noted
Centrica	Non-Confidential	No comment	Noted
Scottish Power	Non-Confidential	<p>Suppliers should be able to recover their costs from DNOs/IDNOs when MPANs are created on the wrong network or set up on the wrong GSP Group. However, our preference would be to find a solution to this issue to ensure MPANs are not created on the wrong network or set up on the wrong GSP Group.</p> <p>In addition to this issue, we experience issues receiving information from DNO timeously on disconnections. We have looked at the last 400 days of D0125 flows received. Only 58% were received within 30 days of the disconnection date and over 20% are received over a year after the disconnection date. In a number of instances, we have been purchasing energy for these MPANs, paying DUOS invoices and other settlement charges and invoicing the customer only for it all to be cancelled on receipt of the Confirmation of Disconnection of Supply (D0125) from the Distributor with a backdated date</p>	
BUUK	Non-Confidential	<p>We have some observations and queries relating to the proposal:</p> <ul style="list-style-type: none"> <li>• The provision of MPAS services is a requirement of our licence and the MPAS charging statement is also in force by virtue of our licence. The purpose of this is to allow distributors to recover the costs for providing a service which their licence imposes upon them. It is generally a supplier's choice to engage in the market and so any costs which they incur in doing so are part of that choice, rather than by virtue of licence obligation.</li> </ul>	



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		<ul style="list-style-type: none"><li>• Would the process of charging reduce admin or would it be more burdensome and costly to implement than not doing anything? There are already obligations within code to get data accurate, why should the suppliers benefit where data isn't accurate? How does this value end up being passed onto consumers or does it just increase supplier revenue? It is also worth noting that while LDSOs do have the right to charge in the event of errors, we understand that it is rare that this system of charging would be implemented under current circumstances however, should Suppliers start invoking charges, doubtless this would change.</li><li>• How do you determine liability for an error? We might get told the GSP group is A (East) by UKPN power networks but actually it is connected to GSP C (London) because they border each other. This has happened in the past and it would be difficult to understand how this could be captured within code. As outlined in our response to question 3, no database would account for IDNO presence.</li><li>• What does good look like? Is it possible to understand what the SLA could actually be and what constitutes an error etc? This doesn't feel like a straightforward thing to do or to get right and we should be realistic about whether it's possible. DCUSA RFI DIF 69 Page 3 of 3 1.0</li><li>• In situations where errors are as a result of incorrect information being provided to I/DNOs in the first place, penalties would not prevent this from reoccurring and thus would be of no benefit to the end customer</li></ul>	
Working Group Conclusions: There were no comments raised that weren't raised that hadn't been raised previously.			

## **DIF 69 – Incorrect GSP**

### **COLLATED RFI RESPONSES WITH WORKING GROUP COMMENTS**

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