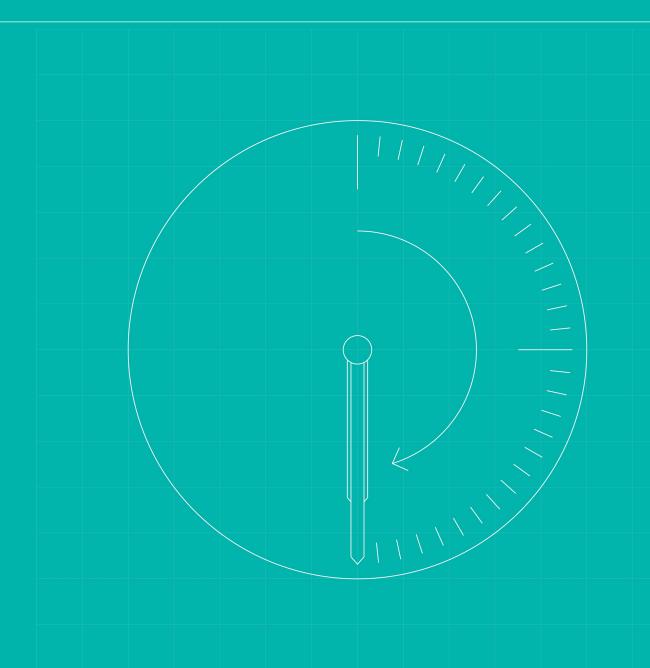


## Code Drafting Consultation 1 Advisory Notes -Data Services and Meter Services

Version 1.1

MHHS DEL1000

### Consultation Advisory Notes





Guidance for participants on providing feedback in the review process

The Code Workstream has produced several Code Artefacts for industry review and comment.

This consultation process seeks to confirm that the Design Artefacts have been correctly translated into the Code Artefacts.

Review feedback should consider whether the code drafting reflects the MHHS Design

- If you feel it does not, please submit your feedback by downloading the Code Artefacts Consultation Comments from the Quick Links on Code collaboration base.
- If you feel the code could better reflect the MHHS Design, please respond with improved wording
- If you spot a minor change or typo, please respond

The topic areas in scope for this industry consultation are:

- Balancing & Settlement Code (BSC) Data Services
- BSC Metering Services
- Retail Energy Code (REC) Metering Services

A high-level traceability matrix is published on the Code Drafting Working Group (CDWG) Collaboration Base Quick Links menu. Low-level traceability have been attached as documents alongside the Code Artefacts for BSCP700, BSCP70X and REC Metering Services.

All documents are either new clean versioned artefacts or redlined versions. All comments and redlining will be removed when the documents are baselined.

The Design solution is baselined through the Design Workstream and does not form part of the Code Drafting Consultation. Any comments relating to the MHHS Design should be directed to <u>design@mhhsprogramme.co.uk</u>



To submit your feedback, please download the Code Artefacts Consultation Comments from the Quick Links on the right-hand side of the Code consultation page. Save the spreadsheet with a file name that includes the short name of your organisation. Once completed, please email the spreadsheet to <u>code@mhhsprogramme.co.uk</u>.

#### Consultation questions:

Column Header	Guidance Note	Field Type	Field Requirement
Code Artefact Name	Choose the Code Artefact that you're reviewing from the drop-down list	Drop-down menu	Mandatory
Document Section	Include the section for which your comment is related to e.g. paragraph 4.1	Free text	Mandatory
Comments	Provide the comment you have in relation to the document you are reviewing e.g. CSS (or CCS in document) is referred to as Actor but no interaction with CSS in business process	Free text	Mandatory
Related Design Artefact	If your comment relates to a Design Artefact, please ensure you include the name of the Artefact e.g. MHHSP-BPD002	Free text	Optional
Related Design Artefact Section/Step	If your comment relates to a Design Artefact, please ensure you include the relevant section or step in the Artefact	Free text	Optional
Suggested Change	For example, propose new wording	Free text	Mandatory
Comment Owner	Provide your name as the comment owner	Free text	Mandatory
Organisation	Provide the name of your organisation	Free text	Mandatory
Constituency	Provide the name of your constituency	Drop-down menu	Mandatory

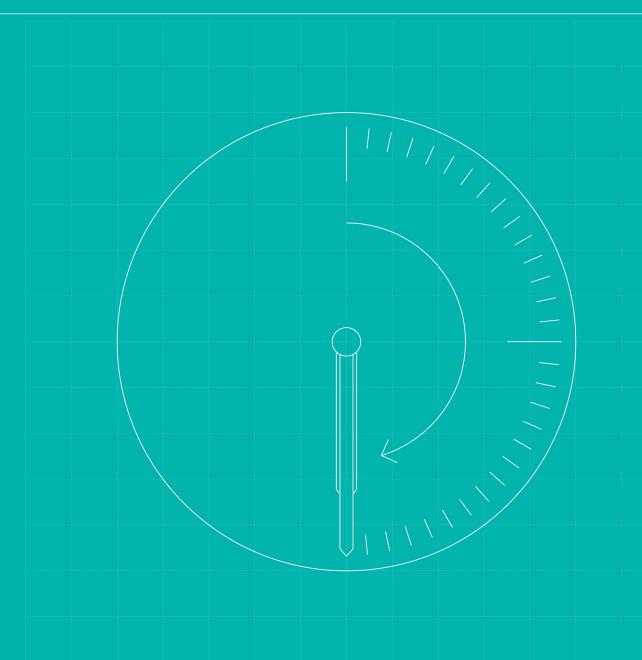


#### Code Artefacts Consultation Review Process

Review Stage	What happens in the review stage?	What do I need to do as a participant?
1. Comment Triage & Resolution	<ul> <li>Comments will be reviewed and allocated to a triage category</li> <li>Code Issues will be identified and prioritised</li> <li>Comment responses will be updated to provide the rationale and/or the proposed change</li> </ul>	<ul> <li>Comment Owners to provide further information on comment if required</li> <li>Comment Owners to be available to discuss comments directly if required</li> </ul>
2. Comment Response Review	<ul> <li>Comment responses will be published onto the Collaboration Base and through the CDWG papers</li> <li>Code drafting will be presented to CDWG for participant feedback and review following open consultation with industry parties</li> <li>CDWG will review the comments and issues raised through drafting and determine any changes or additions to code drafting</li> <li>CDWG review activities will be presented to CCAG for consideration as to whether code drafting can be approved in principle before the final consultation</li> </ul>	<ul> <li>Review comment responses and proposed changes</li> <li>Review CDWG meeting materials and provide feedback before the meeting</li> <li>Attend CDWG meetings to contribute to comment discussions</li> </ul>
3. Agree consensus	<ul> <li>Where there is not consensus across industry parties, comments will be identified and entered into the Dissensus process</li> <li>Comment owners will be contacted to raise a Dissensus Form</li> <li>Dissensus Issues will be discussed in the Dissensus forum</li> </ul>	<ul> <li>Comment Owners to complete Dissensus Form, summarising their position and providing rationale and associated materiality</li> <li>Comment Owners to present their position at the Dissensus forum for discussion</li> <li>Industry Participants to attend the Dissensus forum to agree decision on Dissensus items</li> </ul>
4. Cross-Code Advisory Group (CCAG) (assurance)	<ul> <li>Oversee central coordination, monitoring and management of code changes</li> <li>Review and action work carried out by CDWG</li> <li>Manage, consult and approve recommended decisions from CDWG</li> </ul>	<ul> <li>Provide feedback to your Constituency Representative for discussion at CCAG. Please note that any code drafting questions should be raised at CDWG</li> </ul>



## Balancing and Settlement Code (BSC) Code Artefacts





BSC Data Service Code Artefacts in scope of 14 February 2023 consultation are set out below:

BSC document	Related Design Artefact	Related BSC Document	Change tracking applied	Complexity of change
BSCP700 - Unmetered Suppliers Data Services (UMSDS)	MHHSP-BP002, MHHSP-BP003, MHHSP-BP004, MHHSP-BP005, MHHSP-BP007 MHHSP-BP008, MHHSP-BP0010B, MHHSP-BP019, MHHSP- BPD002, MHHSP-BPD003, MHHSP-BPD004, MHHSP-BPD005, MHHSP-BPD007 MHHSP- BPD008, MHHSP-BP00D10B, MHHSP- BPD019MHHSP-BRS001, MHHSP-BRS002, MHHSP-METH004, MHHSP-METH009	BSCP520	Clean BSCP document	High
BSCP70X - Unmetered Supplies Operations (UMSO)	MHHSP-BP001,MHHSP-BP002, MHHSP-BP003, MHHSP-BP004, MHHSP-BP004B, MHHSP- BP007, MHHSP-BP008, MHHSP-BP0010, MHHSP-BP0010B, MHHSP-BPD002, MHHSP- BPD003,MHHSP-BPD004, MHHSP-BPD005, MHHSP-BPD007 MHHSP-BPD008, MHHSP- BP00D10, MHHSP-BRS001, MHHSP-BRS002, MHHSP-METH004, MHHSP-METH009	BSCP520	Clean BSCP document	High



BSC Data Service Code Artefacts in scope of 23 February 2023 consultation are set out below:

BSC document	Related Design Artefact	Related BSC Document	Change tracking applied	Complexity of change
BSCP701 - Smart Data Collection / SDS	MHHSP-BP003C, MHHSP-BP004, MHHSP- BP005, MHHSP-BP009, MHHSP-BP011, MHHSP- BP016, MHHSP-BPD003C, MHHSP-BPD004, MHHSP-BPD005, MHHSP-BPD009, MHHSP- BPD016, MHHSP-BRS001, MHHSP-METH001	BSCP502 BSCP504	Clean BSCP document	High
BSCP702 - Advanced Data Collection / ADS	MHHSP-BP003C, MHHSP-BP004, MHHSP- BP005, MHHSP-BP009, MHHSP-BP011, MHHSP- BP016, MHHSP-BPD003C, MHHSP-BPD004, MHHSP-BPD005, MHHSP-BPD009, MHHSP- BPD016, MHHSP-BRS001	BSCP502	Clean BSCP document	High
BSC Section J - Party Agents and Qualification under the Code	MHHS Target Operating Model	BSC Section J	Redlined against Section_J_v20.2_P395_Conf ormed	Medium
BSC Section L - Metering	MHHS Target Operating Model	BSC Section L	Redlined against Section_L_v20.2_P395_Conf ormed	Medium



#### BSC Metering Services Code Artefacts in scope of 14 February 2023 consultation are set out below:

BSC document	Related Design Artefact	Change tracking applied	Complexity of change
Code of Practice 1	MHHS Target Operating Model	Redlined against BSC_CoP1_v15.0	Low
Code of Practice 2	MHHS Target Operating Model	Redlined against BSC_CoP2_v17.0	Low
Code of Practice 3	MHHS Target Operating Model	Redlined against BSC_CoP3_v17.0	Low
Code of Practice 4	MHHS Target Operating Model	Redlined against BSC_CoP4_v16.0	Low
Code of Practice 5	MHHS Target Operating Model	Redlined against BSC_CoP5_v18.0	Low
Code of Practice 6	MHHS Target Operating Model	Redlined against BSC_CoP6_Issue4_v9.0	Low
Code of Practice 7	MHHS Target Operating Model	Redlined against BSC_CoP7_Issue2_v7.0	Low
Code of Practice 10	MHHS Target Operating Model	Redlined against BSC_CoP10_v14.0	Low
Section K: Classification and Registration of Metering Systems and BM Units	MHHS Target Operating Model	Redlined against Section_J_v47.2_Redlining_P376 +P450+P395	Low
BSCP601. Metering Protocol Approval and Compliance Testing	MHHS Target Operating Model	Redlined against BSC601_CoP10_v14.0	Low



BSC Metering Services Code Artefacts in scope of 14 February 2023 consultation with no changes required are set out below:

BSC document	Related Design Artefact	Change tracking applied	Complexity of change
Code of Practice 8	N/A	N/A	No changes required – related to the non-half-hourly sector
Code of Practice 9	M/A	N/A	No changes required - related to the non-half-hourly sector



The table below shows Balancing & Settlement Code Procedures (BSCPs) with Data Services impacting processes, which will be delivered in a later tranche, and the supporting rationale:

BSCP	Topic Area	Rationale
BSCP01 - Overview of Trading Arrangements	Transition	Require other text in place first
BSCP11 - Trading Disputes (could expand to include Consumption Amendments process)	Consequential Code Change	Part of Elexon code deliverables
BSCP32 - Metering Dispensations	Mop-up	Require other text in place first
BSCP68 - Transfer of Registration of Metering Systems between CMRS and SMRS	Registration	Allocated to Registration
BSCP515 - Licensed Distribution (will address as part of the Registration Service tranche)	Registration	Allocated to Registration
BSCP537 - Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs	Consequential Code Change	Part of Elexon code deliverables
BSCP550 - Shared SVA Metering Arrangement of Half Hourly Import and Export Active Energy	Mop-up	Require other text in place first
PSL100 - Party Service Line	Mop-up	Require other text in place first



The table below shows Balancing & Settlement Code Procedures (BSCPs) with Data Services or Metering Services impacting processes, which will be delivered in a later tranche:

BSCPs
Change of Service (not coincident with change of Supplier)
Fault Process
Change of Metering Service
Change of Meter
Long Term Vacant Process
Demand Control Events
Revenue Protection
Pre-payment meter process



BSCP700 is a new Balancing & Settlement Code Procedure which covers:

- Responsibilities of the Unmetered Supplies Data Service (UMSDS)
- Requirements and processes for the UMSDS
- Appointment of the UMSDS
- Establishment of a new UMS Inventory
- Change of UMSDS
- Data collection and processing
- Approval process for Equivalent Meters
- Approval process for Central Management Systems
- Related fault processes



BSCP70X is a new Balancing & Settlement Code Procedure which covers:

- Responsibilities of the Licenced Distribution System Operator (LDSO) in relation to unmetered supplies
- Responsibilities of the Unmetered Supplies Operator (UMSO)
- Requirements and processes for the UMSOs
- Appointment of the UMSO
- Establishment of a new UMS Inventory
- Change of UMSDS
- Approval of unmetered Industry Standing Data
- Related fault processes

BSCP70X will be numbered once the document has been baselined



BSCP701 & BSCP702 are new Balancing & Settlement Code Procedure where the following approach was taken:

- The drafting has adhered to the existing BSCP Section titles, but repurposed Section 2 (previously 'Not Used') to set out the Service Requirements and Responsibilities
- Source Artefacts have been cited in [Square-Brackets] within the document rather than as comment bubbles for readability these will be removed in the final drafting
- The main source for the drafting is the Design Artefacts, however some obligations and processes are carried over from the precursor BSCP(s) and annotated as [BSCPx]
- Data formats, enumerations and rules will be defined in the relevant Data Specification document and hence not included in the BSCP
- The BSCP does not go in to detail about how to qualify for the DIP or how to populate DIP messages the final location of DIP documentation is still under consideration

#### Continued onto the next page



#### Continued

- Generic requirements on data retention would sit better elsewhere, perhaps PSL100, but this is still under consideration
- Process steps mostly executed by the Registration Service (eg. appointments) or the Supplier without ADS involvement are not captured in these Data Service BSCPs

As with BSCP700, these have been drafted as clean BSCPs with no mark-up or tracked changes – they represent a purely target state view of the design



#### BSC Section J: Party Agents and Qualification under the Code & BSC Section L: Metering

• MHHS go-live changes are shown as redlined against the current BSC baseline, but some existing provisions that will apply during transition have not been removed.



#### Code of Practices 1 to 7 and Code of Practice 10

• Updates proposed to text to reflect the MHHS design. Most notably it removes references to "Half Hourly or Non Half Hourly Data Collectors" and updates with the term " Data Services" and " Advanced Data Services;"

#### **BSCP601 Metering Protocol Approval and Compliance Testing**

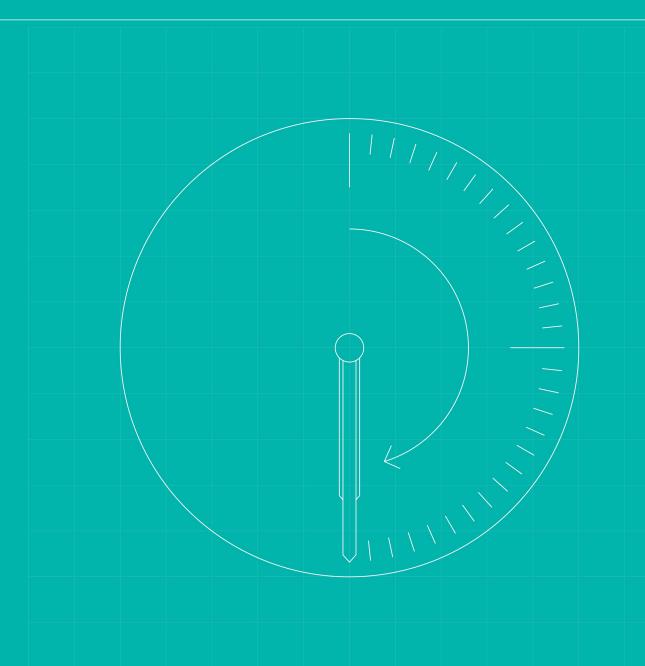
• Updates to the proposed text to reflect MHHS design. Most notable removing references to " Half Hourly Data Collectors " and updated with " Advanced Data Services"

#### **BSC Section K: Classification and Registration of Metering Systems and BM Units**

 Update to the proposed text to reflect MHHS design. Most notably removing references to "Non Half Metering Equipment", "Half Hourly Metering Equipment" and "Data Aggregators".



Retail Energy Code (REC) Code Drafting





#### Metering code documents in scope of 14 February 2023 consultation set out below:

REC document	Related Design Artefact	Change tracking applied	Size of change?
Schedule 13 Transfer of Consumer Data	BRS001 – Data Service Requirements BRS002 – Metering Service Requirements	No change	Small – no change to the Schedule
Schedule 14 Metering Operations	MHHSP-BP001 MHHSP-BPD001 MHHSP-BP002 MHHSP-BP003B MHHSP-BP003B MHHSP-BP007 MHHSP-BP007 MHHSP-BP007 MHHSP-BP008 MHHSP-BP008 MHHSP-BP009 MHHSP-BP009 MHHSP-BP0010 MHHSP-BP0010 MHHSP-BP0011 BRS002 – Metering Service Requirements OPC001 – Operational Choreography	Change tracked against v3.1 (Nov 22)	Large – significant redraft of operational MEM processes
Consolidated Metering Code of Practice	BRS002 – Metering Service Requirements	Change tracked against v2.0 CP R0047	Small – minor changes to reflect revised terminology



The table below shows REC Schedules with Metering Services impacting processes, which will be delivered in a later tranche, and the supporting rationale:

Artefact	Topic Area	Rationale
REC Schedule 15 Metering Accreditation	Qualification	This schedule is being amended by REC CP R0064. MHHS changes will be minor and it would be clearer to users if these are applied against the R0064 baseline expected in time for the Qualification drafting tranche



- Schedule 13 sets out requirements for sending the D0225 (Priority Services Details) and D0302 (Notification of Customer Details)
- There no changes proposed to this Schedule.
- Both flows were included within the scope of recent RECCo DTN consultation with expectation that:
  - Receipt of D0225 by NHHDC will be removed SDS and ADS scenario variants added
  - Receipt of D0302 by NHHDC and HHDC will be removed SDS and ADS scenario variants added
- As currently, it is a supplier's responsibility to ensure, through contracts with MEM, SDS and ADS (and any other recipient e.g. Meter Reading Service), that PSR and Consumer Contact data is managed appropriately and in accordance with data protection legislation.
- CDWG members were invited to provide comments on this position and no comments were received.



#### Schedule 14: Metering Operations - summary of change

- Structural changes to separate electricity and gas provisions more clearly as requested by CDWG.
- Drafting to reflect provisions for MHHS Migrated MPANs separate transition text (to be consulted upon later) to reflect parallel running.
- Updates proposed to business processes and actors to reflect MHHS design detailed further in Appendix 1.
- Approach maintained where end-to-end processes are defined in the REC, including interfaces with SMRS. Detailed validation and response timescales for SMRS to be captured in the BSC.
- Code Body review undertaken to ensure alignment of appointment process, proving activities and connection / disconnection arrangements with BSC and DCUSA.
- Interactions identified with multiple REC CPs, to be reflected through MHHS drafting mop up phase e.g.:
  - R0015 'Remote communication obligations for electricity Advanced Meters'.
  - R0017 'Invalid Requests for Site Technical Details'
  - R0047 'Metering Code of Practice Consolidation Review'
  - o R0064 'Creating a Meter Operator Agent and MOCoP Installer'



- Legal text for approved CP R0047 'Metering Code of Practice Consolidation Review' considered in the review: <u>Metering</u> <u>Code of Practice Consolidation Review - REC Portal</u>
- Limited change identified as MHHS impacts communication of metering data and not how physical metering works should be completed.
- Minor changes made to reflect amended terminology and removal of clauses captured in the Metering Operations Schedule.
- Code Body review noted interaction with REC CP R0017 'Invalid Requests for Site Technical Details'. Changes to
  requirements relating to this process are not included in MHHS text. Interactions between CP R0017 text and MHHS
  drafting to be considered in the mop up tranche.
- CDWG members were invited to provide comments on the proposed changes and no comments were received. Minor changes identified through internal BSC / REC reviews have been included in red-lined changes.



## Thank you





# Appendix 1 – Detailed Changes to REC Schedule 14

#### Schedule 14: Metering Operations – approach to delivering redlined change

- Structural changes to move existing text, to more clearly differentiate gas and electricity requirements these movements have not been change marked, however comment boxes are included to support review.
- Comment boxes included throughout to explain the rationale for change, specifically referencing Metering Service requirements within the BRS002 document and SLAs within the Operational Choreography OPC001.
- General tidy up to move footnotes into the body of the text to improve document usability.
- Changes to amend terminology to reflect MHHS terms e.g. Advanced, Smart and Traditional Metering Assets.
- All other minor changes / typographical errors relating to existing drafting not being amended by MHHS that were identified during drafting, have been referred to the Code Manager to amend under BAU activities. Note any formatting errors will be addressed as part of the upload into EMAR.
- The following slides summarise the key changes made to each section of the Schedule. Parts B and C are not covered as the changes are minor and only made as a result of the gas and electricity separation.



- Part A details general metering operations requirements and specific requirements for gas /electricity MEMs and Suppliers.
- Additional requirements included to cover exchange of messages via the DIP placeholder to review again following receipt of DIP detailed design and BSC DIP User requirement drafting from MHHS Programme.
- New requirement on the Code Manager to manage ongoing SSC and TPR domain data as discussed via the CCIAG.
- Amended requirements to reflect the MHHS design relating to Import / Export associations and to clearly distinguish this from existing BSC Shared SVA Metering System arrangements.
- Changes to reflect the removal of the Data Collector market role and to replace with a more generic requirement to maintain data and share in accordance with the operational process in Part D.
- Addition of a generic clause cover updates to registration data to reflect BP009.
- Amendment of provisions relating to MDD to reflect to ISD requirements.



- The following bullets explain the key changes to the Metering Asset installation process. This drafting is an amalgamation of the existing provisions and new MHHS processes included in BP009.
  - Amalgamation of NHH and HH processes into a single interface table with steps applicable to all types of Metering Assets unless explicitly stated.
  - Separation of references to cumulative and meter register readings to reflect the MHHS reliance on cumulative readings for Smart and Advanced Metering Assets.
  - Removal of D0367 process for suppliers to provide smart metering configuration as this data is no longer shared with the MEM.
  - Removal of D0313 based on MHHS design principle that all required data for Advanced Metering Assets will be captured in the D0268.
  - Retention of existing sections covering commissioning of measurement transformers.
  - Completion of the installation process at the point the MEM has required data to share with industry. Separate generic process for sharing MTDs and meter read data via the SMRS.



- The following bullets explain the key changes to the Metering Asset removal and exchange process. This drafting is an amalgamation of the existing provisions and new MHHS processes included in BP009.
  - Amalgamation of NHH and HH processes into a single interface table with steps applicable to all types of Metering Assets unless explicitly stated.
  - Separation of references to cumulative and meter register readings to reflect the MHHS reliance on cumulative readings for Smart and Advanced Metering Assets.
  - Clarity added to reflect the split between Metering Point disconnection (governed under the DCUSA) and Metering Asset removal (governed under the REC) Assumption that provisions will be removed from BSCP515.
  - Removal of P0211 in response to MEM work request and replaced with D0221 / D0002 to reflect BP009.
  - Removal of steps to recover data by HHDC and replacement with statement that recovery of metered data will be as per contractual agreement to reflect BP009.
  - Completion of the removal / replacement processes at the point the MEM has required data to share with industry. Separate generic process for sharing MTDs and read data via the SMRS.



- The following bullets explain the key changes to the change of feeder and fault resolution processes. This drafting is an amalgamation of the existing provisions and new MHHS processes included in BP009.
  - Amalgamation of NHH and HH processes into a single interface table with steps applicable to all types of Metering Assets unless explicitly stated.
  - Proposal to remove the section on non communicating NHH Advanced Metering Assets from the fault resolution process as the new MHHS interfaces don't accommodate this..
  - Completion of the change of feeder and fault resolution processes at the point the MEM has required data to share with industry. Separate generic process for sharing MTDs and meter read data via the SMRS.



- New generic section added to reflect the process for sharing Meter Technical Details and read data via the DIP based on BP009. This process includes the following:
  - New DIP interface IF005 for sharing MTDs.
  - Legacy process for sending MTDs via the D0268 (Advanced Metering Assets) and D0149/D0150 (Traditional Metering Assets) and D0010 to provide Meter Register Readings.
  - New DIP interface IF0041 for sharing Cumulative Reads for Smart Metering Assets and Advanced Metering Assets.
  - Steps of the process completed by the SMRS, with the detailed validation and associated SLAs to be included in the BSC.



- The following bullets explain the key changes to the change of energisation process. This drafting is an amalgamation of the existing provisions and new MHHS processes included in BP008.
  - Amalgamation of existing energisation and de-energisation processes into a single change of energisation process.
  - Note open design query being reviewed by the MHHS Programme on the interaction between installation / removal and change of energisation process. Clarity required on which interfaces are required when processes occur concurrently.
  - Includes steps for DNOs to share data with MEMs and MEMS to share date with other Market Participants via the SMRS.



- The following bullets explain the key changes to the Switch and MEM appointment processes. This drafting is an amalgamation of the existing provisions and new MHHS processes included in BP001 / 02.
  - Amalgamation of NHH and HH processes into a single interface table with steps applicable to all types of Metering Assets unless explicitly stated.
  - Introduction of clauses to clarify the approach to appointment for Related Metering Points and Associated Import / Export Metering Points.
  - Reference to MEM appointment on Initial Registration being the same, without a Losing MEM.
  - Removal of interface table for change of MEM with no Switch as the process is the same, apart from the trigger step.
  - New section on maintenance of appointment data to cover changes to appointment data as reflected in BP010, setting of the Customer Direct Contract Flag and updates to Site Technical Details.



- The following bullets explain the key aspects of the new change of Market Segment process. This drafting reflects the new MHHS processes included in BP011.
  - BP011 includes full details of the appointment elements of the process. These haven't been reflected in change of Market Segment section of the schedule as the full end to end appointment process is covered in the 'Switch with Concurrent Change of MEM' section.
  - Details added regarding the population of the IF0031 MEM appointment interface to enable the MEM appointment to take place before the Metering Asset exchange.
  - Reference added to the Market Segment re-assessment by the SMRS with the assumption that detailed provisions will be captured in the BSC.



#### Schedule 14: Metering Operations – Part D – Other Sections

- The following bullets explain the minor changes made to other sections:
  - New change of Data Service section drafted to replace the existing change of Data Collector section. Content limited with cross reference to the BSC for details.
  - Change of MAP section is an amalgamation of the existing provisions and new MHHS interface as referenced in the note on BP009.
  - Minor changes to Proving Test provisions to reflect new MHHS terminology.



#### Schedule 14: Metering Operations – Open Design Queries

- The following bullets summarise open design queries which may require further change post consultation:
  - How is the MEM appointed when a new Associated Export Metering Point is established. Does the SMRS automatically appoint the MEM?
  - BR MS086 and 088 require the MEM to delete or obfuscate Consumer Contact Data and PSR Data when they are de-appointed. Design team to confirm whether data should be deleted or obfuscated.
  - The MO Schedule has a section on non-communicating NHH Advanced Metering Assets. Is an amended process required to manage non communicating NHH Advanced Metering Assets post MHHS?
  - BP011C states that the SMRS notifies the Supplier when there is an invalid Market Segment. It is not clear when
    this process would be used in practice. If there is an invalid market segment, why would the SMRS not amend it
    to align to the connection type in the same way it is amending the Market Segment when there are linked MPANs
    across the advanced and smart segments.
  - BP009 states that if there is a change of energisation status at the same time as the meter works then the BP008 process will be followed. Unclear how this interaction works in practice.
  - Lack of clarity regarding communication to Losing MEM where the appointment / de-appointment lapses as no secured active response is received.

