

CP Progression – CP1344

Meeting Name Supplier Volume Allocation Group

Meeting Date 05 April 2011

Purpose of paper For Decision

Summary This report provides details of the background, solution, impacts and industry views of CP1344 'New PARMS Serials: Further Amendments to BSCP533 and BSCP533 Appendices'. The SVG is requested to consider the report and to reach a decision on whether to approve the CP.

1. Why Change?

1.1 Background

- 1.1.1 A review of the Performance Assurance Reporting and Monitoring System (PARMS) Serials was approved by the Performance Assurance Board (PAB) in September 2008. The review was carried out by a group comprising ELEXON staff and industry experts. The review group concluded that a number of Serials no longer provide meaningful metric data for Settlement Risks. The remaining serials were not considered to fully measure the risks in the Risk Evaluation Register (RER). It was the review group's opinion that these Serials could be amended to better align them to the key Settlement Risks. The Final Outcome Report that was taken to the PAB provides details of the review group's findings ([PAB105/05](#)).
- 1.1.2 [CP1334](#) 'New PARMS Serials' was raised to take forward the outcomes of the review. It introduced 12 new PARMS Serials in order to address the limitations of the current suite of PARMS Serials, identified by the review group. CP1334 was endorsed by the PAB on 29 July 2010 ([PAB114/06](#)) and then approved by the Supplier Volume Allocation Group (SVG) on 03 August 2010 ([SVG114/02](#)), with an implementation date of 01 July 2011.
- 1.1.3 Following the approval of CP1334, ELEXON raised and then implemented [CP1339](#) 'Amendments to BSCP533 to enable changes to the hosting and operation of the PARMS system' on 01 November 2010. CP1339 amended many of the processes in BSCP533¹ and BSCP536² to reflect the transfer in August 2010 of the hosting and operation of the PARMS system along with many of the related business processes from ELEXON to a BSC Agent (Logica). These changes were not required to be included in the BSCPs until November 2010 because there was a run-off period between the transfer of the hosting and operation between August and November before participants were first required to send PARMS data to the BSC Agent PARMS address. Consequently, CP1339 had to ensure that the Code Subsidiary Documents (CSDs) distinguished between the processes involving Logica (referred to as PARMS in the CSDs) and the processes involving the Performance Assurance Administrator (PAA), delivered by ELEXON.

¹ PARMS Data Provision, Reporting and Publication of Peer Comparison Data

² Supplier Charges

1.2 What is the issue?

1.2.1 CP1334

1.2.2 While carrying out the necessary activities to implement CP1334 on 01 July 2011, we have identified a number of inconsistencies, typographical errors and issues with the wording of the appendices to BSCP533:

- Appendix A: 'PARMS Data File Formats'
- Appendix B: 'PARMS Calculation Guidelines'
- Appendix C 'PARMS Data File Formats and Calculation Guidelines for Obsolete PARMS Serials'

1.2.3 CP1339

1.2.4 Following the implementation of CP1339 on 01 November 2010, we have identified errors in BSCP533 and Appendices where there were incorrect references to 'PAA', which should instead be:

- 'PARMS' (where the reference is to the PARMS system or operator); or
- 'BSC Service Desk'.

1.2.5 The materiality of these changes are low. For example for form F533/05³ we have rarely received such forms in the past; however, the form requires updating to improve its usability. Other changes are required to clarify the activities carried out by PARMS or the BSC Service Desk.

2. Solution

2.1 CP1344 'New PARMS Serials: Further Amendments to BSCP533 and BSCP533 Appendices' was raised on 28 January 2011. It proposes to address the issues in BSCP533 and Appendices, identified following the approval of CP1334 and the approval and implementation of CP1339.

2.2 CP1344 will amend BSCP533 as follows:

1. Section 3.1.2, the sender of the acknowledgement of receipt to the data provider will be changed from PAA to BSC Service Desk.
2. Section 3.1.3 will be created to clarify that PARMS will log the details of the Standing Data.
3. Section 3.3.1 will be amended to change reference from PAA to PARMS.
4. Section 3.7 will be amended to:
 - a. change references from PAA to PARMS, where it refers to the PARMS system or operator
 - b. change references from PAA to BSC Service Desk, who will be the recipient of the F533 form
 - c. include new steps and make other amendments to provide clarity on activities carried out by PARMS
5. Form F533/05 will be amended to replace references to PAA with BSC Service Desk.

2.3 CP1344 will also amend BSCP533 Appendices A, B and C to correct the CP1334 and CP1339 redlining errors and clarify inconsistencies following an ELEXON review and discussions with industry participants.

³ Supplier Validation Response (Supplier Agent submitted data)

3. Industry Views

- 3.1 CP1344 was issued for participant Impact Assessment via CPC00692. We received 10 responses of which 8 agreed and 2 were neutral.
- 3.2 The breakdown of responses is shown in the following table and the full collated participant responses to CP1344 are available on the ELEXON website [here](#).

Respondent Role	Respondent Support		
	Yes	No	Neutral
LDSOs	0	0	2
DC/DA/MOA	2	0	0
Suppliers	2	0	0
Mixed (i.e. two or more of Supplier, Generator, Trader, Party agent or Distributor)	4	0	0
Total	8	0	2

- 3.3 Of the respondents who supported the change, 8 agreed that the CP provides clarity around the new serials that CP1334 will bring into effect. Respondents indicated that there would be no additional cost or added timescales provided that CP1344 is implemented at the same time as CP1334 on 01 July 2011.
- 3.4 As part of the industry impact assessment, we sought feedback on areas that parties would like to see covered in the supporting PARMS Serials guidance documentation that we are currently drafting. We received some responses which will feed into the drafting process. The comments primarily concerned providing guidance around the circumstances when erroneous flows may be sent.
- 3.5 One respondent commented that they would like to see greater guidance around the HM14 serial, because MOAs' performance maybe adversely affected by delays out of their control. They went on to clarify that:
- 3.6 *"The clock starts on this serial once a fault has been identified and stops once the results of the fault investigation have been sent to the Supplier/HHDC. However, there may be a delay between the fault being identified and it being reported to the Meter Operator which would impact the Meter Operator's ability to respond to the investigation within 15 working days."*
- 3.7 We spoke to the respondent and discussed that it was more beneficial to cover these circumstances as part of the guidance documents, to which they agreed.

3.8 Comments on the Proposed Redlining

- 3.8.1 We received some comments identifying typographical errors in the drafting, which are listed in the table below. During discussions with one respondent, we agreed that some of the explanation text would



benefit from a few further clarifications. The clarifications are still all very minor in nature and are listed in the table below. The additional revisions have also been highlighted in BSCP533 Appendix B.

3.8.2 The comments on the redlining and how we proposed to address them are described in the table below.

Redline Comments			
Organisation	Doc Name and Location	Comment	ELEXON recommendation
TMA Data Management	BSCP533 Appendix B, Page 9	<p>"Erroneous flows must still be submitted against for those Serials which measure timeliness. This is because even if it was erroneous the sending of the data flow should still not be late"</p> <p>Suggest: Erroneous flows must still be submitted for those Serials measuring timeliness. This is because even if it was erroneous, the sending of the data flow should not be late"</p>	<p>Agree, wording should be revised as suggested</p> <p><u>Erroneous flows must still be submitted against for those Serials which measuring timeliness. This is because even if it was erroneous, the sending of the data flow should still not be late.</u></p>
Accenture (on behalf of Scottish Power)	BSCP533 Appendix A, Front page	The Date should be updated from 1 November 2010 to 01 July 2011	Change to correct version control will be made
Accenture (on behalf of Scottish Power)	BSCP533 Appendix A, Page 2	The Date should be updated from 1 November 2010 to 01 July 2011	Change to correct version control will be made
ELEXON/npower	BSCP533 Appendix B: - HM11 – Page 41 - NM11 – Page 58 - NM12 – Page 63 - NM12 – Page 98	<p>"If a D0139 has been received informing NHHDCs that the Metering System is de-energised, it should be included." This gives the impression that we also need to report on D0139s being received, however I think what is trying to be said is not to exclude de-energised sites from the report. If correct what about energised, status and erroneous D0139?</p>	<p>The D0139 was included to explain how a Supplier may have come to know about the Energisation Status without having received a D0150. However, this adds confusion and is immaterial given that both energised and de-energised MPANs need to be included in these serials. We recommend the following revision:</p> <p><u>If a D0139 has been received, informing NHHDCs that the Metering System is de-energised, it should be included in reporting. Both energised and de-energised MPANs should be reported against.</u></p>
ELEXON/npower	BSCP533 Appendix B - NM11 – Page 59	Also clarification regarding exclusions from submissions section it makes reference to checking the D0152 to see if the Measurement Class is UMS but	In the case of the redlined text, the J0082 Measurement Class ID can also be found in the D0052 flow which an NHHDC might receive from the



	- NM12 – Page 65	only MPANs which have been through a CoA will have a D0152 so this will not be possible to check for all.	Supplier or UMSO. The guidance could use a bit of clarification and recommend the following revision in order to cover more scenarios than the D0152 will cover: <u>Unmetered Supply (UMS) Metering Systems should be excluded from reporting, as no MTDs will be required. The J0082 Measurement Class ID flag in the D0152 or D0052 will indicate to the NHHDC that its newly appointed Metering System is UMS.</u>
ELEXON/npower	BSCP533 Appendix B: – NM12 Page 62 NM12 - Page 97	Purpose of serial - Why is D0148 crossed out? Unable to measure change. NM12 redlining has removed reference to D0148 being received but it still makes reference to it in the "What will Non Half Hourly Data Collectors have to do to submit the data?" The additional redlining has introduced more confusion for this serial.	Agree, the crossing out of D0148 has been removed. See re-instated 'D0148' below: Missing is to be considered as when a D0155/ D0148 (as applicable) has been received, but no associated D0150 received.
ELEXON/npower	BSCP533 Appendix B	Purpose of serial - Why is D0148 crossed out? Unable to measure change. NM12 redlining has removed reference to D0148 being received but it still makes reference to it in the "What will Non Half Hourly Data Collectors have to do to submit the data?" The additional redlining has introduced more confusion for this serial.	Agree, the crossing out of D0148 has been removed. See re-instated 'D0148' below: Missing is to be considered as when a D0155/ D0148 has been received, but no associated D0150 received.

4. Intended Benefits

- 4.1 CP1344 will correct the errors and inconsistencies introduced by CP1339 and CP1334, allowing the benefits of those CPs to be delivered in full. The changes are necessary to ensure PARMs data providers interpret and use the serials correctly; BSCP533 and its appendices must clearly and unambiguously describe the processes and requirements. If they do not correctly reflect the new serials, there is a risk that data providers may submit incorrect or inconsistent data.
- 4.2 By correcting the issues identified by CP1344, BSCP533 and the BSCP533 appendices will better support the provisions in Section S⁴ and Z⁵ by ensuring there is no ambiguity over the purpose of the new PARMs Serials. This in turn will provide better metric data to monitor Suppliers and Supplier Agents performance compared with the existing ones.

⁴ Supplier Volume Allocation
⁵ Performance Assurance

- 4.3 Additionally by correcting the errors in BSCP533, the intended benefits of the raising and implementation of CP1339 (significantly reducing the ELEXON effort associated with PARMS processes and allowing ELEXON to focus on other BSC activities by transferring the hosting and operation of the PARMS and business processes to a BSC Agent (Logica)) will be realised.

5. Impacts and Costs

- 5.1 The following table summarises the ELEXON effort required to implement CP1344 and the Impact on market participants.

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	Our implementation costs are 2 man days of effort (equating to £480). The effort includes applying the proposed changes to BSCP533 and appendices, and updating internal LWIs.	01 July 2011 (as part of the June 2011 Release) is suitable.
DC/DAs	No additional cost or impact, providing it is approved and implemented promptly alongside CP1334	01 July 2011 (as part of the June 2011 Release) is suitable.
LDSO, DNO	No impact	01 July 2011 (as part of the June 2011 Release) is suitable.
Supplier	Minimal or no impact	01 July 2011 (as part of the June 2011 Release) is suitable.

6. Implementation Approach

- 6.1 The changes in CP1344 require implementation at the same time as CP1334 to ensure providers of PARMS data interpret and use the serials correctly, and to minimise costs to Party Agents.

7. Recommendations

- 7.1 The SVG is requested to:
- a) **AGREE** the proposed amendments to BSCP533, Appendix A, Appendix B and Appendix C; and
 - b) **APPROVE** CP1344 for implementation alongside CP1334 on 01 July 2011, as part of the June 2011 Release.

Attachments:

- Attachment A - BSCP533 Redlined changes
- Attachment B - BSCP533 Appendix A redlined Changes
- Attachment C - BSCP533 Appendix B redlined Changes
- Attachment D - BSCP533 Appendix C redlined Changes



For more information, please contact:

David Barber

Market Compliance Analyst

david.barber@elexon.co.uk

020 7380 4327