

<p align="center">Draft Change Proposal – BSCP40/01</p>	<p>DCP No: 0009</p> <p><i>Version No: 1.0</i> (mandatory by BSCCo)</p>
<p>Title (mandatory by originator) Improvement to Proving Test process: Audit trail</p>	
<p>Description of Problem/Issue (mandatory by originator)</p> <p>The Proving Test process is currently susceptible to failure/non-completion due to various generic Supplier Agent non-compliances (Market Issue 1654) and also the current procedures used to administer and support the Balancing and Settlement Code (BSC) arrangements requirements for Proving Tests.</p> <p>Two Change Proposals (CPs) (CP1142 ‘Changes to the Proving Test Process’ and CP1171 ‘Improvements to the Proving Process’) relating to improvements to the Proving Test process have been rejected by the Supplier Volume Allocation Group (SVG). When the SVG rejected CP1171, it noted that there were elements of both CP1142 and CP1171 that could be beneficial. Therefore, the SVG requested that a working group meeting was held to discuss the beneficial elements of these Change Proposals and to decide the best way forward.</p> <p>At a working group meeting on 24 January 2007, a review of CP1142 and CP1171 was undertaken. It was attended by members of the Supplier Agents’ Forum (SAF) (primarily Half Hourly Meter Operator Agents (HHMOAs) and Half Hourly Data Collectors (HHDCs)), a SVG representative and the originator of CP1171 (NPower). The Group reviewed the issues and solutions of CP1142 and CP1171 (that had been rejected by the SVG) in order to determine whether any beneficial changes could be made to the proving process.</p> <p>The Group agreed the following recommendations:</p> <ol style="list-style-type: none"> 1. that the issues surrounding Proving Tests had diminished and did not therefore justify wholesale market changes; 2. to raise a Draft Change Proposal (DCP) proposing 2 minor changes to the Proving Test process (in BSCP502 and BSCP514): <ol style="list-style-type: none"> a. to allow 5 Working Days for the Meter Operator to respond to the Data Collector on request of Proving Test for CoP5 Metering Systems, as set out in Method 2 of BSCP502 and BSCP514 (current working practice is 3 Working Days)¹; b. implement an audit trail for tracking failed Proving Tests (drafting changes based on the solution to Issue 4 of CP1142); 3. to issue a guidance note (based on a best working practice document presented to the SAF on 25 May 2005) to help HHMOAs and HHDCs fulfil their obligations under the BSC; and 4. that ELEXON investigate the issue of the HHDC having to estimate (‘E’ flagged) data when a Meter fails a Proving Test even though the data from the Metering System passes the HHDC's validation process (i.e. the HHDC believes that the data is valid). The Group would like the HHDC to be able to flag the data as actual even though they recognise that 	

¹ After further investigation by ELEXON it is proposed that this change from 3-5 Working Days fits better within a guidance document as the current 3 day working practice is not documented within BSCP502 ‘Half Hour Data Collection for SVA Metering Systems Registered in SMRS’ or BSCP514 ‘SVA Meter Operations for Metering Systems Registered in SMRS’. This will progressed through a guidance note (recommendation 3).

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<p>the flagging as estimated incentives the agents to conduct a successful Proving Test in a timely manner.</p> <p>This DCP seeks to address the recommendation 2 b) above. The other recommendations are being progressed separately by ELEXON.</p> <p><u>Group's rationale for the above recommendations:</u></p> <ul style="list-style-type: none"> • The Group believed that the majority of issues raised by CP1142 and CP1171 could be addressed with better communication between HHMOAs and HHDCs and better working practices, as some agents are able to meet the requirements of the BSC. Therefore, a guidance note should be produced to help clarify the process and any best working practices. The Group noted a best working practice document that had gone to the SAF in May 2005 and agreed for this to be used as the basis for the guidance note. The Group also noted that the guidance note should provide guidance on where Proving Tests should be failed; cover the practice of HHMOAs 'actively chasing' issues such as failed Proving Tests; the use of injection tests; and providing guidance on how the HHMOA should fill the 'reason for failure' field in the D0002 'Fault Resolution Report or Request for Decision on Further Action'; • The Group noted that changes have been made to the 'Wheatley' system used by a number of HHMOAs (implemented in February 2007), which help the HHMOA to reduce the number/prevent failed Proving Tests, therefore helping to reduce the overall occurrence of failed Proving Tests; • The Group believed that a number of failed Proving Tests are caused by the timescales allowed for the HHMOA to respond to the HHDC. 3 Working Days were quoted as the current timescale (in regards to Change of Practice 5 (CoP5) Metering Systems) and the Group felt that if this were extended to 5 Working Days, this may alleviate the pressure on the HHMOA to fail a Proving Test due to a lack of time. The Group did recognise that the overall timescales for conducting a Proving Test, say for CoP5 of 15 Working Days should not be altered; • In conjunction with the change above, the Group believed that Issue 4 of CP1142, where a HHMOA may fail a Proving Test in the interests of maintaining its performance, was still valid. The solution to Issue 4 was to require the HHMOAs and HHDCs to maintain an audit trail to explain a delay to the completion of a Proving Test. The Group proposed that a DCP encompassing this change and the change above (see footnote 1) be drafted for progression via the SVG; • The Group believed that there were instances of the HHDC having to flag data as estimated, where the Metering System had failed the Proving Test, when the Metered Data was in fact valid. The Group did recognise that the BSC requirement to flag the data as estimated incentivises the HHMOA and HHDC to achieve a successful Proving Test in a timely manner. However, the Group requested that ELEXON investigate this issue, in particular to clarify the rationale for the requirement to estimate. 	

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<p>Justification for Change <i>(mandatory by originator)</i></p> <p>The Group believed that Issue 2b, where a Meter Operator Agent (MOA) may fail a Proving Test in the interests of maintaining its performance, was still valid (see recommendation 2(b) in ‘Description of Problem/Issue’). The solution to Issue 2b was to require the HHMOAs and HHDCs to maintain an audit trail to explain a delay to the completion of a Proving Test. This audit trail would provide further information regarding instances where Proving Tests were not successful due to incomplete status in prescribed timescales.</p>	
<p>Proposed Solution(s) <i>(mandatory by originator)</i></p> <p>Amend Section 4.6.5 of BSCP502 ‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’ and Section 8.3.5 of BSCP514 ‘SVA Meter Operations for Metering Systems Registered in SMRS’ to read:</p> <p>“In the event that timescales are exceeded and the Proving Test is not completed, the process shall proceed to completion <u>and an audit trail will be maintained by Supplier Agents in order to explain the delay.</u>”</p>	
<p>Version History <i>(mandatory by BSCCo)</i></p> <p>Version 1.0 for industry Impact Assessment.</p>	
<p>Has this DCP been raised for discussion by a Working Group <i>(optional by originator):</i> N</p> <p>This was raised following discussion by a SAF Working Group.</p>	
<p>Originator’s Details:</p> <p>BCA Name...</p> <p>Organisation...ELEXON</p> <p>Email Address.....ccc@elexon.co.uk</p> <p>Telephone Number...</p> <p>Date...06 July 2007</p>	
<p>Attachments: No</p>	