Draft Change Proposal – BSCP40/01	DCP0040 *Version No:* ***1.0*** *(mandatory by BSCCo)*

Title *(mandatory by originator)*
Submitting Meter Technical Details to the Technical Assurance Agent

Description of Problem/Issue *(mandatory by originator)*

The purpose of this DCP is to consult upon two potential solutions to provide an alternative means of submitting Meter Technical Details (MTDs) to the Technical Assurance Agent (TAA). At present, Participants are required to submit MTDs to the TAA in advance of a TAA inspection visit, or bring the details to the inspection. Currently, to submit MTDs in advance, participants may either:

1. Send MTDs to the TAA via fax, email or post; or
2. Manually enter MTDs via the TAA Management Tool (TAAMT).

TAAMT is an on-line tool for communication between participants and the TAA regarding Technical Assurance of Metering Systems inspections. The TAA can also manually enter MTDs into TAAMT.

Participants including Suppliers, Half Hourly Data Collectors (HHDCs) and Meter Operator Agents (MOAs) have noted that the existing methods of MTD submission are laborious, inefficient and susceptible to typographical errors. Errors in manual entry into TAAMT can result in incorrect non-compliances. Several participants requested that ELEXON consider alternative methods for the submission of MTDs to the TAA.

ELEXON and the TAA agree that a change to the process for MTD submission could potentially increase efficiency and accuracy in this area, and have benefits for the TAA. ELEXON presented this issue to the Supplier Agent Forum (SAF) and the Supplier Volume Allocation Group (SVG). The SVG noted the issue (SVG90/04) and noted that ELEXON would raise a DCP to consult on the potential solutions proposed. The options are detailed in the 'Proposed Solutions' section, below.

Justification for Change *(mandatory by originator)*

Electronic submission of MTDs to the TAA would increase the efficiency of the MTD submission process, eradicate the potential for manual errors from the process (thus eliminating incorrect non-compliances due to errors in manual data entry) and facilitate MTD provision prior to inspection visits.

Potential benefits for the Technical Assurance audit processes, common to both solution options for electronic data receipt/loading, are:

1. Electronic provision of data by both HHDC and MOA would enable data consistency checks by allowing comparison of data (to detect non-physical (i.e. data) non-compliances);
2. Routine provision of data by the MOA would enable spot checking or large scale checks of data;
3. Comparison of all or a selection of data items for all meters and registers associated with an MSID could be undertaken automatically; and
4. Comparison of routinely provided and specifically requested MOA/DC data would be possible, and checking meter samples for clock drift.

TAA view:
The TAA believes that Option 1 should be progressed and, if Option 1 is not agreed, supports

progression of Option 2. The TAA also recommends the potential audit process benefits 1-4 set out above should be considered, and notes these benefits can be achieved independently of each other, potentially increasing the benefit of the Technical Assurance process.

Under Option 1 the HHDC would provide MTD data to the TAA via the D0268. If Option 1 is not agreed, the TAA supports increasing the recipient list for the D0268 from the MOA to include the TAA. This would mean HHDCs continuing to provide MTD data to the TAA by different means. Though the TAA believes it is preferable that all participants provide MTDs in DTC format, this could be addressed at a later date as appropriate, and there would still be benefits from MOA MTDs being received via the D0268.

Proposed Solution(s) *(mandatory by originator)*

Two potential solutions have been put forward for alternative electronic means of MTD submission to the TAA. ELEXON believes that Option 1 is the best solution, but notes that the options have different impacts on participants that could impact their viability and the associated benefit of the change. The solution options are:

> **Option 1:** The TAA receiving all MTDs via the D0268 'Half Hourly Meter Technical Details' flow over the Data Transfer Network (DTN).
>
> **Option 2:** The TAA receiving MTDs via a D0268 flow received via email.

Full details of Code Subsidiary Document changes needed for each option are not included with this DCP, but full redlined changes would be provided with any CP raised to progress either option. The ELEXON implementation cost is currently estimated to be **£2,420** for either of the solution options (equating to approximately 11 Man Days implementation effort).

Approximate TAA costs for implementation of each option are provided below. These estimated costs cover the TAA impact to implement TAAMT data loading only - the impacts on participants, systems and due to documentation changes are not yet assessed. ***In your response please provide details of the impact of each of the solution options on your systems and indicate a preferred solution.***

Solution Option 1: Send MTDs to the TAA in the D0268 flow over the DTN[1]
The TAA would receive MTDs via the D0268 flow over the DTN from **MOAs**, **HHDCs** and **Suppliers**. The TAA would also become a recipient of every D0268 issued by the MOA. Estimated TAA implementation cost for TAAMT data loading for this option: approximately **£27,000**.

The estimated ELEXON implementation cost for Option 1 is £2,420. There would be a MRA implementation cost associated with the DTC changes required by this option, which is yet to be assessed.

[1] Supplementary site information would still need to be sent to the TAA outside the DTN (no D0268 change or new flow is proposed to accommodate this)

Draft Change Proposal – BSCP40/01	DCP0040 *Version No:* ***1.0*** *(mandatory by BSCCo)*

D0268s from HHDCs and Suppliers must contain *data from the participants' operational source data*. The TAA has highlighted that there is little audit benefit in the HHDC/Supplier simply 'bouncing' the D0268 data received from the MOA to the TAA (the same requirement exists for Option 1).

Option 1 impacts:

- Market Domain Data (MDD): addition of the TAA as a new role in MDD;
- TAAMT: change TAAMT (and related documentation) to allow D0268 to be uploaded;
- BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes': change method for providing MTDs to 'electronically or as agreed';
- BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS': change the Half Hourly provisions to reflect that the D0268 will be sent to the TAA (impacting MOA, HHDC and Suppliers); and
- MRA Data Transfer Catalogue (DTC) - change the DTC to allow the D0268 flow to be sent over the DTN to the TAA. Three new 'From' and 'To' flows would be added for MOAs, HHDCs and Suppliers sending the D0268 to the TAA.

Option 1 TAA impacts:

1. Lowest TAAMT impact in terms of coding to load data; single format with well defined structure which is already understood throughout the industry.
2. Neither the HHDC nor Supplier issues the D0268 at present; they only receive it. There is little difference in the impact on TAAMT whether it is modified to receive data from the MOA exclusively, or from the MOA, HHDC and Supplier.
3. The TAA service provider already has a DTN Gateway connection; therefore TAA receipt of data via the DTN will not increase charges.

Solution Option 2: Send MTDs to the TAA in a D0268 flow via email

The TAA would receive MTDs in a D0268 flow received via email from **MOAs**, **HHDCs** and **Suppliers** (Supplier MTDs would be supplied but not validated, because they do not have the potential to impact Settlement). Estimated TAA implementation cost for TAAMT data loading for this option: approximately **£27,400**.

The estimated ELEXON implementation cost for Option 2 is £2,420. No DTC change is required (the DTN is not impacted), so there is no MRA implementation cost associated with Option 2.

Information from HHDCs and Suppliers must use *data from the participants' operational source data*, as there is little audit benefit in HHDC/Supplier 'bouncing' D0268 data received from the MOA to the TAA (the same requirement exists for Option 1).

Option 2 impacts:

- MDD: addition of the TAA as a new role in MDD;
- TAAMT: change TAAMT (and related documentation) to allow D0268 data to be uploaded; and
- BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes': change the method for providing MTDs in BSCP27 to 'electronically or as agreed'.

Draft Change Proposal – BSCP40/01	DCP0040 *Version No:* ***1.0*** *(mandatory by BSCCo)*

Note the DTC is **not** impacted by Option 2.

Option 2 TAA impacts:

1. The TAAMT coding impact to load data is similar to that for Option 1. A method for delivering the DTC flow to TAAMT would also be required.
2. The D2068 provided to TAAMT would need a header and footer; with the header showing the provider and source database.

Version History ***(mandatory by BSCCo)***

Version 1.0 for industry impact assessment.

Related issue: potential for TAA checks on MTD quality:

Separate to the progression of the potential changes outlined in this DCP preliminary investigation is ongoing into incorporating a requirement to carry out checks on MTD quality into the TAA function, if the TAA becomes a recipient of the D0268 (via either of the solution options). The aim would be to identify instances where the D0268 may have been incorrectly populated by the HHMOA, potentially resulting in an overstatement of energy entering Settlement.

This follows a proposal that HHDCs should carry out checks (see rejected CP1243, 'Mandating HHDC checks on quality of Meter Technical Details'); a paper on the possibility of the TAA carrying out checks will be presented to the SVG.

Has this DCP been raised for discussion by a Working Group ***(optional by originator)*****: ~~Y~~/N***

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Attachments: ~~Y~~/N*