

<b>Draft Change Proposal – BSCP40/01</b>	DCP No: 0028  <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
<b>Title</b> Communication of Data Estimations and Substitutions for Central Volume Allocation Metering Systems	
<b>Description of Problem/Issue</b>  <p>Summary</p> <p>BSCP03 (Data Estimation and Substitution for Central Volume Allocation) describes the process for agreeing the appropriate metered data values associated with Active Energy meters to be used by CDCA for CVA when there is a problem with the values obtained via the normal metered data collection process.</p> <p>In some circumstances the current process can lead to uncertainty for registrants as to precisely which data have been or will be used in settlement aggregation, This can complicate validation and consequently has potential to reduce settlement accuracy.</p> <p>System and process improvements have been identified that would result in a more efficient delivery of this key industry requirement, whilst reducing some of the ambiguity surrounding the application of estimates/substitutions under certain scenarios.</p> <p>Description</p> <p>Currently, in the event that there is missing or suspect metered data that requires a data estimation or substitution, CDCA will submit a CDCA-I037 report to the Registrant requesting acceptance or rejection of the proposed estimated/substituted values. This CDCA-I037 report is sent via fax or e-mail to the Registrant. The Registrant will then either accept CDCA's proposed values or suggest alternatives.</p> <p>The CDCA is required to submit data to Settlement and send confirmation to the Registrant no later than 13 working days following the applicable Settlement Day.</p> <p>The estimated/substituted values will be confirmed to the Registrant on a monthly basis in the CDCA-I014 report. This report will contain all estimated/substituted values, irrespective of whether these were subsequently replaced with actual data by CDCA.</p> <p>This process currently creates the following problems/issues;</p> <ul style="list-style-type: none"> <li>• It is possible that initial estimated/substituted data will be subsequently replaced with actual data. This regularly occurs when data is first collected following an outstation download failure. The CDCA-I014 report can therefore not be relied upon as a valid confirmation of estimates or substitutions currently in use in Settlement.</li> <li>• It is also possible that initial actual data will be subsequently replaced with estimates or substitutions. This could occur if an error exists on the main meter that is identified following data collection. It is therefore not possible for a Registrant to assume actual data takes preference over any received estimates/substitutions because the actual data may not be the final values submitted by the CDCA to Settlement.</li> </ul>	

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<ul style="list-style-type: none"> <li>• Section 1.3 (c) of BSCP03 states that ‘By the II Run any metered data estimation will be entered into the CDCA system and provided to the Registrant in the Estimated Data Notification Report (CDCA-I037) for agreement.’ It is only possible for the Registrant to confirm that CDCA have entered the estimated data correctly into the CDCA system [which is not always the case] at the end of each month when the I014 file is received.</li> <li>• The requirement for the Registrant to authorise/reject CDCAs proposed estimates/substitutions is unnecessary and inefficient. CDCA is estimating/substituting data in line with the guidance issued in Section 1.7 of BSCP03. If the Registrant is aware of any information that may assist the CDCA in the retrieval of data or in the preparation of a data estimate or substitution, it is obligated to provide this to the CDCA as per Section 3.1.3 of BSCP03. Section 3.1.6 allows the Registrant the opportunity to submit revised data for consideration by CDCA should it disagree with the estimated/substituted data provided.</li> </ul>	
<p><b>Justification for Change</b></p> <p>The existing process, as defined in BSCP03, creates a degree of ambiguity surrounding the application of estimated and substituted data within Settlement. It is also felt that the requirement for the Registrant to authorise any estimates or substitutions prior to CDCA submitting them to Settlement is unnecessary and inefficient.</p> <p>The Registrant is made aware of estimated/substituted data by CDCA using two mechanisms, the CDCA-I037, which is sent via fax or e-mail, and the CDCA-I014, which is sent electronically at the end of each month. It is our belief that both mechanisms, whilst adding value to the process, do not provide a clear unambiguous indication of the metered data that CDCA has submitted to Settlement.</p> <p>The CDCA-I037 is not sent electronically. Therefore any data comprised within it that the Registrant elects to utilise in its internal systems will need to be manually entered. Combining this with a similar manual process for CDCA to enter these values into its aggregation systems results in two opportunities for data entry errors.</p> <p>The CDCA-I014 is not an accurate representation of the final metered data that has been submitted to Settlement. On that basis it is purely a reference tool. The frequency of submission also limits the opportunity for a Registrant to detect and address incorrect estimates/substitutions that have been applied for settlement dates nearing the start of the reporting month.</p> <p>If the Registrant is in receipt of estimated/substituted data that it feels is not an adequate reflection of generation and/or demand associated with the applicable metering system, then the onus should be on the Registrant to initiate a change to this data with CDCA.</p>	

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<p><b>Proposed Solution(s)</b></p> <p>Three possible solutions are proposed.</p> <ol style="list-style-type: none"> <li>1. Our preference would be for the CDCA-I014 to be issued to the Registrant on an ad-hoc basis, at the time when CDCA enter the estimated/substituted data into CDCA systems. It would be logical for this data to be sent following any I012s issued that day. This would provide the Registrant with a clear indication of the final values to be used in Settlement at that time.</li> <li>2. The first alternative method would be for the CDCA-I012 to be re-configured to include estimated/substituted data. Through the use of an appropriate flag, the Registrant would be provided with an indication as to the reason for estimation/substitution. By utilising the existing CDCA-I012 report, the Registrant would be provided with a clear auditable trail of metered data submitted for each metering system, and through the use of the files timestamp could identify the most recent data that is to be used in Settlement.</li> <li>3. As a second alternative, a new CDCA file containing estimated data could be created. This file would be sent to the Registrant as part of step 3.1.9. Should actual data subsequently be obtained by CDCA, then this would be submitted to the Registrant on the CDCA-I012. It would therefore be possible for the Registrant to accurately determine the final values submitted by CDCA to Settlement.</li> </ol> <p>In all three proposals, were the Registrant to then consider comparing the aggregated BMU metered volumes provided by SAA with its own aggregation of the metered data provided by CDCA, it would be doing so with the certainty that its aggregation comprised the most up to date metered data submitted to Settlement.</p> <p>As part of all of these solutions it is proposed that the Registrant is no longer obligated to accept or reject proposed estimates/substitutions submitted by CDCA. Its existing opportunities to advise CDCA of information that may assist in the generation of a data estimate, or to submit alternative data for consideration, are not affected by this change proposal and should continue.</p>	
<p><b>Version History</b> <i>(mandatory by BSCCo)</i></p> <p>N/A</p>	
<p><b>Has this DCP been raised for discussion by a Working Group</b> <i>(optional by originator):</i> <del>Y</del>/N* (delete as appropriate)</p>	

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Attachments: No	