

Change Proposal – BSCP40/02	CP No: 1192 <i>Version No: 2.0</i> <i>(mandatory by BSCCo)</i>
Title Changes to the Investigate Inconsistencies processes in BSCP502 and BSCP514 (Half Hourly only)	
Description of Problem/Issue <i>(mandatory by originator)</i> <p>This CP is a replication of the Half-Hourly aspects of CP1063 'Changes to the Investigate Inconsistencies processes in BSCP502, BSCP504 and BSCP514'. This version 2.0 of CP1192 has been raised to seek an additional industry impact assessment of revised redlining, produced following consideration of the industry impact assessment responses received to CPC00607 for v1.0 of the CP. Further detail regarding the changes from the redlining for v1.0 can be found in the 'Version History' section of this CP form. The updated redlining, and the full responses received to CPC00607 (including ELEXON's and/or the proposer's response to the comments received), are included as attachments to this form.</p> <p>Discussions at Supplier Agents Forum (SAF) and Supplier Hub Management Forum (SHMF) have supported the raising of a new Change Proposal containing the Half-Hourly requirements of the recently rejected CP1063. It is hoped that the streamlining of this Change Proposal into Half-Hourly only will facilitate a quick adoption of the outlined proposed solutions.</p> <p>BSCP502 'Half Hourly Data Collection For SVA Metering Systems Registered in SMRS' and BSCP514 'SVA Meter Operations For Metering Systems Registered in SMRS' contains variations on the process for investigating inconsistencies and performing Metering System investigations. The BSC Auditor highlighted this issue during the October 2003 to September 2004 audit period.</p> <p>The processes set out in the BSCPs are inconsistent with each other, with the Serials set out in PSL110 'Party Service Line for Meter Operator Agents' (MOAs) and with current practice. This does not aid the timely resolution of Metering System investigations and faults. The relevant sections in the BSCPs do not make the distinction between investigating inconsistencies in data and performing Metering System investigations and the differences or relationship between the two. These processes should have a consistent approach in the MOA and Data Collector (DC) documents.</p>	
Proposed Solution(s) <i>(mandatory by originator)</i> <p>Changes should be made to BSCP502 and BSCP514 to ensure that these BSCPs are consistent in the area of investigating inconsistencies and in particular where this leads to a Metering System Investigation to reflect agreed current practice.</p> <p>The following principles should be included for the Half Hourly (HH) process:</p> <ul style="list-style-type: none"> ▪ The D0002 'Fault Resolution Report or Request for Decision on Further Action' data flow should only be used to notify that a Metering System fault has been resolved. The D0005 'Instruction on Action' data flow should be used to provide updates where the Metering System fault cannot be resolved within the required time scales; ▪ After 5WD of the receipt of a D0001 'Request Metering System Investigation' by the MOA, the MOA should either send a D0002 notifying that the fault is resolved or a D0005 notifying that the fault cannot be resolved within 5WD and thereafter use the D0005 to communicate updates on the resolution of the fault prior to the fault being resolved; ▪ BSCP502 should contain two distinct processes, one detailing the process of investigating inconsistencies, and the other detailing the process of Metering System Investigations, with reference from one process to the other where required; 	

- BSCP502 and BSCP514 should clearly define where the D0002 and D0005 data flows should be used within the Metering System investigation process – i.e. the D0002 should be sent within 5WD of the resolution of the problem and the D0005 sent at 5WD, 15WD and as appropriate thereafter when the problem cannot be resolved;
- The timings in the 'when' column should make reference to the receipt of, or data on, particular data flows as opposed to a reference back to a previous step;
- An appendix should be included in BSCP502 detailing the circumstances in which a D0001 should be sent to request a Metering System Investigation; and
- Participants, other than the MOA or HHDC, should notify the relevant agent of an inconsistency or problem via the Supplier.

The suggested redlined changes to BSCP502 and BSCP514 are included as attachments to this CP. Please note that the redlined step tables contain references to existing appendices within the BSCPs. These existing appendices are not reproduced in the attached redlined text, as it is not the intention of the CP to alter these. Participants wishing to view these appendices for reference when reviewing the redlining should download the current versions of BSCP502 and BSCP514 from the BSC Website at <http://www.elexon.co.uk/bscrelateddocs/BSCPs/default.aspx>.

PSL130 section 1.5.3.3 currently requires the HHDC to report to the LDSO on the resolution of any Metering System faults. Under the changes proposed by this CP, the LDSO would only need to be informed if they had raised the original investigation request, and even then it would be the Supplier's responsibility to notify the LDSO rather than the HHDC. Consequential changes are therefore also required to PSL130 to reflect this change. The suggested redlined changes to PSL130 are attached to this CP.

It is envisaged that no DTC changes or changes to the SVA Data Catalogue will be required to facilitate this Half-Hourly only solution.

Note that the proposed redlined changes for BSCP502 and BSCP514 have been updated for v2.0 of this CP, following consideration of the industry impact assessment responses received for v1.0. Further detail can be found in the 'Version History' section of this CP form.

Justification for Change *(mandatory by originator)*

As a result of the inconsistencies between the BSCPs, various market participants are using different time scales and processes while investigating inconsistencies and suspected Meter faults. Furthermore, inconsistencies or suspect data may not be reported where participants such as LDSOs have no mechanism for reporting these problems. As a result, the Supplier does not have control and complete understanding of the Meter faults and inconsistencies.

Issues in this area were first reported in March 2002, and were recorded as Statement of Significant Matters (SSM) 12 in the 2006/07 BSC Audit.¹ SSM 12 'Metering Faults not resolved on a timely basis' stated that the Auditor had identified that not all SVA MOAs were resolving Metering System faults on a timely basis. The Half Hourly side of this issue has subsequently been removed from the Statement of Significant Matters in the 2006/07 BSC Audit Report, as the level of incidence and number of impacted Agents has reduced.²

¹ See the full 2005/06 BSC Audit Report at: http://www.elexon.co.uk/documents/Participating_in_the_Market/Market_Guidance_-_Audit_Documentation_and_Reports/BSC_Auditors_Report_and_SSM_vFINAL_.pdf.

² See the full 2006/07 BSC Audit Report at: http://www.elexon.co.uk/documents/Participating_in_the_Market/Market_Guidance_-_Audit_Documentation_and_Reports/BSC_Auditors_Report_and_SSM_vFINAL.pdf.

However, it remains an open Market Issue. In its March 2007 Issue document, the Auditor considered that there would be benefit in clarifying the process, and noted that CP1192 had been raised in this area.³

The changes proposed to the Metering System Investigation Process formalise changes discussed at the Settlement Data Review group (SDRG). These issues were originally discussed at the Supplier Agents Forum (SAF) on 7 April 2004, 19 May 2004 and 9 June 2004. More recent discussions (following the rejection of CP1063) have taken place at both the November 2006 SAF and SHMF meetings: both meetings supported the progression of this issue via the raising of an exclusive Half-Hourly Change Proposal.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? *(mandatory by originator)*

S 2.2.1 & 2.3.1

Estimated Implementation Costs *(mandatory by BSCCo)*

£440 (2 ELEXON man days) to implement the redlined changes to BSCP502, BSCP514 and PSL130.

Configurable Items Affected by Proposed Solution(s) *(mandatory by originator)*

BSCP502 'Half Hourly Data Collection For SVA Metering Systems Registered in SMRS'
BSCP514 'SVA Meter Operations For Metering Systems Registered in SMRS'
PSL130 'Half Hourly Data Collection'

Impact on Core Industry Documents or System Operator-Transmission Owner Code *(mandatory by originator)*

None

Related Changes and/or Projects *(mandatory by BSCCo)*

None identified

Requested Implementation Date *(mandatory by originator)*

February 2008

Reason:

We believe this change requires a minimum of 6 months notice between approval and implementation.

Version History *(mandatory by BSCCo)*

CP1192 v1.0 was raised on 8 June 2007, and was issued for industry impact assessment on that day via CPC00607. Following consideration of the responses received to CPC00607, and a further review of the redlining, by the proposer and ELEXON, changes have been made to the proposed redlining for BSCP502 and BSCP514. CP1192 v2.0 was raised on 7 September 2007 to seek an additional industry impact assessment of this revised redlining.

The updated redlining for BSCP502 and BSCP514 is included as Attachments A and B to v2.0 of this CP. The redlining for PSL130 (unchanged from version 1.0 of the CP) is included as Attachment C.

³ See the full BSC Auditor's Issue Document for the MOA Market (as at 31 March 2007) at [http://www.elexon.co.uk/documents/Participating_in_the_Market/Performance_Assurance_Framework_-_BSC_Audit_-_Market_Issue_Documents/Meter_operator_\(HH_and_NHH\).pdf](http://www.elexon.co.uk/documents/Participating_in_the_Market/Performance_Assurance_Framework_-_BSC_Audit_-_Market_Issue_Documents/Meter_operator_(HH_and_NHH).pdf).

The full responses received to CPC00607, and ELEXON's and/or the proposer's response to the comments received, are included as Attachment D.

ELEXON has also sought a view from the BSC Auditor regarding the concerns raised by some respondents in relation to the robustness of certain areas of the redlining for audit purposes. Further details can be found in Attachment D.

The full changes made to the redlining are as follows:

BSCP502

- 3.4.2.1 now reads 'At any time, if appropriate' rather than 'if appropriate', to distinguish between this step and 3.4.2.3;
- The first sentence in Footnote 1 in 3.4.2.1, which previously said 'Any Participant other than the HHDA or MOA wishing to notify the HHDC of an inconsistency shall do so via the Supplier', has been removed to reflect the changes to step 3.4.2.3 (see below);
- 3.4.2.3 now reads 'If required, following a data aggregation exception' to clarify when HHDA's should notify inconsistencies using the D0235 (noting that HHDA's can also notify inconsistencies in other circumstances and at other times under step 3.4.2.1). The Supplier has also been added as a recipient of the D0235 to clarify that they will automatically receive the D0235). The HHMOA to HHDC route has been removed from this step, as the intention of the CP is that HHMOA's should notify inconsistencies via the Supplier under step 3.4.2.1;
- 3.4.2.5 now reads 'following 3.4.2.4' rather than 'within 2WD of 3.4.2.4', as 3.4.2.4 is already 'within 5WDs' of the HHDC being notified of the inconsistency so the additional 2WD delay is unnecessary;
- The wording of Footnote 2 in 3.4.2.7 has been amended to reflect the changes to step 3.4.2.3;
- The wording of 3.4.3.3 has been amended to reflect that the use of the Fault Resolution Plan is optional, and the method of sending the plan has been amended to 'Fax, Email or other method, as agreed' to allow Parties to use their own online systems should they wish;
- The wording of Footnote 4 in 3.4.3.3 has been amended to reflect that the Fault Resolution Plan is optional, and only needs to be used where the D0005 is not sufficient for the purpose of providing the required information;
- The reference to sending a Meter register reading in 3.4.3.10 has been removed, and replaced with 'initiate process 3.3.6 if appropriate' (as existing process 3.3.6 in BSCP502 already covers the sending of Meter register readings in these circumstances).

BSCP514

- The wording of 5.4.1.4 has been amended to reflect that the Fault Resolution Plan is optional, and the method of sending the plan has been amended to 'Fax, Email or other method, as agreed' to allow Parties to use their own online systems should they wish;
- The reference to taking a Meter register reading in 5.4.1.7 has been removed, as this duplicated step 5.4.1.12;
- The wording of 5.4.1.10 has been amended to reflect that the Fault Resolution Plan is optional, and that the HHMOA will therefore use the D0005 and/or the plan;
- The reference to taking a Meter register reading in 5.4.1.10 has been removed, as this duplicated step 5.4.1.12;
- The reference to sending a Meter register reading in 5.4.1.12 has been removed, and replaced with 'initiate process 5.3.4 if appropriate' (as existing process 5.3.4 in BSCP514 already

covers the sending of Meter register readings in these circumstances);

- The wording of Endnote 5 has been amended to reflect that the Fault Resolution Plan is optional, and only needs to be used where the D0005 is not sufficient for the purpose of providing the required information.

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Attachments: Y (If Yes, No. of Pages attached): Attachment A – BSCP502 redlined text (8 pages); Attachment B - BSCP514 redlined text (5 pages); Attachment C – PSL130 redlined text (1 page); Attachment D – Impact Assessment responses received for CP1192 v1.0.