

## Change Proposal – BSCP40/01

CP No: 1185

Version No: 2.0

### **Title** *(mandatory by originator)*

Allowing a Reading to be Deemed where an Actual Reading is Unavailable on a Change of Standard Settlement Configuration.

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

Deemed reads are being calculated by Non-Half Hourly Data Collectors (NHHDCs) in circumstances other than those specified by the BSC. This was first raised as an audit issue in March 2004. Modification P176 'Clarification of the Requirements for Estimation/Deeming of Meter Readings/Advances in Certain Circumstances to Facilitate Correction of Anomalies in Settlement Consumption' was raised to change the permissible circumstances where a reading may be deemed and so to rectify the issue. This made changes to the BSC and BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems registered in SMRS' and was implemented in the November 2005 release.

This Modification introduced into BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' a number of circumstances where deeming is allowable. One circumstance which is not explicitly stated as an allowable deeming circumstance is change of Standard Settlement Configuration (SSC). There is an outstanding market audit issue in this area arising at four NHHDCs who are currently deeming a Meter reading on a change of SSC where an actual Meter reading is not available.

BSCP504 3.3.7 'Reconfigure or Replace SVA Metering System – No Change of Measurement Class' allows a reading to be deemed in the event that a valid actual reading is unobtainable. BSCP504 3.3.6 'Change of Standard Settlement Configuration' does not include the steps for deeming a Meter reading where a valid actual Meter reading is unavailable. A change of SSC cannot normally be effected without reconfiguring the Metering System (e.g. changing the clock or reconfiguring the registers) or replacing the Meter, and so in reality, section 3.3.6 and 3.3.7 are often both completed where a change of SSC occurs. This being the case, it is suggested that deeming should be explicitly allowable on a change of SSC (even where this does not involve a reconfiguration or replacement of the Metering System).

It is therefore suggested that a change is made to BSCP 504 section 3.3.6 to allow change of SSC to be a permitted deeming scenario. This would also ensure consistency between section 3.3.6 and 3.3.7.

This CP was initially included in the Impact Assessment that was issued in December 2006. This CPs is being re-circulated for Impact Assessment with the redlined changes required to BSCP504 to implement the CP.

The initial impact assessment for this CP raised a number of questions by respondents. Answers to these questions are included below:

- Does the ability to deem a Meter reading in this scenario lessen the obligation to obtain an actual Meter reading? - No, there is a requirement to take a Meter reading on a change of SSC, in the same way as there is a requirement to take a Meter reading when a Metering System is replaced or reconfigured. Allowing a Meter reading to be deemed on a change of SSC is proposed for inclusion in BSCP504 to deal with the instances when either a Meter reading is lost in transit or fails validation. If a Meter reading is taken, then the process of deeming one would not be triggered (unless the actual Meter reading taken failed validation). This is similar to the requirements added to other parts of the BSCP as part of approved Modification P176. Deeming is always intended to be a last resort scenario and the wording of BSCP504 reflects this.
- Deeming should not be taken as an opportunity to amend SSC's in NHHDC systems without first ensuring MOA holds the same SSC configuration. - Previous steps in the process state that on a change of SSC, the MOA provides the new Meter Technical Details on the D00149 'Notification of Mapping Details' / D00150 'Non-Half Hourly Meter Technical Details' and the Meter reading on the D0010 'Meter Readings'. The Supplier sends the NHHDC details of the new SSC on the D0052 'Affirmation of Metering System Settlement Details', and the NHHDC validates the D0052 based on the

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| <p>details received from the MOA. Therefore, there seems to be appropriate safeguards in the process to ensure that the NHHDC does not update SSCs in NHHDC without first ensuring that the MOA holds the same SSC configuration.</p> <ul style="list-style-type: none"> <li>• If an initial Meter reading is not gained then deeming backwards should be permitted after receipt of a minimum 2 reads and not 1 read that has been suggested. – As part of Approved Modification P176, it was agreed that an initial Meter reading could be deemed following the receipt of one actual Meter reading as some NHHDC systems do not allow subsequent readings to be included in systems without an initial Meter reading. If an initial reading could only be deemed following a change of SSC once two Meter readings had been taken, this would be inconsistent with all other deeming scenarios.</li> <li>• The suggested redlined text that accompanied version 1 of the CP suggested that a reading should be taken by the Meter Operator Agent (MOA) when performing the change of SSC on site. This needs to take into account where the SSC is changed remotely on a pre-payment Meter. – The redlined text accompanying version 2 of this CP takes remote changes of SSC into account.</li> </ul> |  |
| <p><b>Proposed Solution(s)</b> <i>(mandatory by originator)</i></p> <p>Changes to BSCP504 should be made to allow a reading to be deemed following a change of SSC where a reading in this scenario is required by the NHHDC. This would involve including a section on 'Change of Standard Settlement Configuration' in Appendix 4.5, section 4.5.2 'Deeming Circumstances' detailing the process and circumstances for deeming on a change of SSC, where this is required. This would be based on the similar section 4.5.2 f) 'Reconfiguration or Replacement of a Metering System'. Changes would also be needed in section 3.3.6 'Change of Standard Settlement Configuration' in the form of extra actions to be added after 3.3.6.9 similar to those actions in place for other permitted deeming circumstances, i.e. attempting to obtain an actual Meter reading from any available sources prior to a Meter reading being deemed. The proposed redlined changes required to implement this CP are attached.</p> <p>It should be noted that a reading should not be deemed for a change of SSC date which is prior to the Implementation Date of this CP.</p>  |  |
| <p><b>Justification for Change</b> <i>(mandatory by originator)</i></p> <p>An Annualised Advance (AA) cannot be calculated by the EAC/AA system if the Meter Advance Period (MAP) spans a change of SSC. Also the Non-Half Hourly Data Aggregator (NHHDA) cannot accept an AA where the MAP spans a change of SSC. Therefore if there is no validated reading available on change of SSC, no AA can be processed for the period prior to the change. Depending on the NHHDC software used this may also prevent any subsequent consumption being processed for the Metering System.</p> <p>Whilst there is an obligation for the MOA to send the NHHDC Meter readings on a change of SSC, if this does not occur, a Meter reading may be required to allow consumption to be registered in Settlement before and after the change of SSC. Allowing deeming to be permissible on a change of SSC is entirely consistent with Approved Modification P176 which introduced deeming requirements in a number of other circumstances into BSCP504. This deeming circumstance was not however picked up under Approved Modification P176. In particular, currently, NHHDCs are allowed to deem Meter readings as a result of a replacement or reconfiguration of a Metering System.</p>                         |  |
| <p><b>Is the Change being proposed a Housekeeping Change?</b> <i>(optional by originator)</i></p> <p>No <sup>1</sup></p>  |  |

<sup>1</sup> The relevant Panel Committee will decide whether a Change Proposal can be progressed as a Housekeeping Change Proposal.

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| <b>Configurable Items Potentially Affected by Proposed Solution(s)</b> <i>(optional by originator)</i><br>BSCP504 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'   |  |
| <b>Impact on Core Industry Documents or System Operator-Transmission Owner Code</b> <i>(optional by originator)</i><br>None identified  |  |
| <b>Related Changes and/or Projects</b> <i>(mandatory by BSCCo)</i><br>None identified   |  |
| <b>Requested Implementation Date</b> <i>(mandatory by originator)</i><br><br>November 2007.<br><br><b>Reason:</b><br><br>This CP was originally targeted at the June 2007 release, however responses to the Impact Assessment carried out in December 2006 suggested that a June Implementation Date was not achievable, particularly since NHHDC systems are being updated in the February 2007 release for approved Modification P196 'Long Term Vacant Sites'. The Implementation Date for this CP is therefore now suggested to be November 2007. |  |
| <b>Agreed Release/Implementation Date</b> <i>(mandatory by BSCCo)</i><br><br>   |  |
| <b>Originator's Details:</b><br><br><b>BCA Name</b><br><br><b>Organisation</b> <i>ELEXON</i><br><br><b>Email Address</b> <i>ccc@elexon.co.uk</i><br><br><b>Date</b> <i>8 December 2006</i>  |  |
| Attachments: Redlined text for CP1185 based on BSCP504v17.0 (10 Pages)  |  |