



BSCP27 Process Steps review

1. Background

- 1.1 On an annual basis; we review the TAM technique and process for its fitness for purpose and how it meets the needs of our customers. We have just completed the latest review and shared the findings with the TAMEG. This paper explains what we did and the outcomes from the review.
- 1.2 The current contract for the TAA as a BSC Agent comes to an end on 31 March 2012 and we are exploring all the options that we have available to us to make sure that there is a Technical Assurance Agent (TAA) in place April 2013 onwards.
- 1.3 With that in mind, we recognised the need to look at the TAM technique to ensure the technique / service would be suitable for an effective re-procurement process.

2. The review

2.1 What did we do?

2.1.1 We pulled an expert group together from ELEXON and through various workshops and discussions reviewed the technique with the following objectives in mind:

- We will provide a fit for purpose service;
- It will satisfy the obligations in Section L, BSCP27 and other Code Subsidiary Document (CSDs) e.g. Codes of Practice; and
- It will add value to our customers.

2.1.2 We will define the service requirements in readiness for a possible re-procurement process

2.1.3 We pulled this detail together and presented it to the TAMEG at its March 2012 meeting and received further feedback that we used to complete the service requirements.

2.2 What was in scope?

2.2.1 All CVA Metering Systems are deemed to be high risk (in terms of probability of failure and impact on Settlement) and therefore require a high level of assurance.

2.2.2 This review of the technique / service focused on the objectives of the Performance Assurance Framework:

- The efficient, equitable and accurate allocation of energy between Parties; and
- The efficient, accurate and co-ordinated transfer of Metering Systems data between Parties.

2.2.3 We looked at the full TAM technique;

- Sample Selection (including administration)
- Inspection Visit (including administration)
- Results (including administration)



BSCP27 Process Steps review

- Queries and Appeals (including administration)
- Reporting

2.3 What was out of scope?

2.3.1 The TAAMT (Technical Assurance Agent Management tool) or software that supports the TAM technique.

2.3.2 Why? Because our primary concern is that we are using the technique to assure that all aspects of HH Metering Systems are adequately audited, to give us the information that we need to assess the overall health of all the HH Metering Systems.

2.3.3 We will make sure (through our procurement strategy) that we have a fit for purpose solution in place to support the processes (either by using the existing function or by creating a new solution).

2.4 How did we do it?

2.4.1 We looked at the strategy and objectives for the TAM technique in the framework and considered this against:

- The map of the current service provision
- Customer feedback
- Gap analysis in the TAM technique

2.4.2 We then looked at ways to improve the techniques weaknesses e.g. solutions to identified gaps and as a result delivered a new map of the TAM technique.

2.4.3 We are proposing changes to the technique and will need to raise a change proposal. We aim to be able to deliver any agreed changes in November 2012, though if necessary the changes can be implemented in February 2012, as a last resort, as it needs to be in place before start of the Audit year

3. The outcome

3.1 Proposed changes to BSCP27

A table of these can be seen in Appendix 1. These are categorised into three sections:

- 1 - Housekeeping changes;
- 2 - Changes to reflect the requirements of the TAM technique as it stands; and
- 3 - Changes that will add value.

3.2 Proposed changes to the TAM technique

We identified some additional areas that can be implemented into the TAM service / technique. These are things that won't change the BSCP requirements and *will* add value to our customers and provide a more



BSCP27 Process Steps review

holistic approach in ensuring that Settlement data is accurate and complete, while supporting transfer of Metering Systems data.

These changes can be found in section 3 of Appendix A.

Appendices:

Appendix A – Proposed changes to the TAM Technique and BSCP27



BSCP27 Process Steps review

Background

We reviewed all the process steps in BSCP27 against what the current processes in operation are. We have proposed the following changes based on what currently happens to better align the BSCP to the processes and to make sure that any one reading or using BSCP27 is following the processes that are beneficial for Settlements.

The next sections details those proposed changes.

BSCP27 Section 3.1: Main Sample Selection Process – CVA and SVA

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in BSCP27 redlining.	We no longer use fax or letters and would not want to. All communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication (as appropriate).	None – reflects as is process.
Merge 3.1.11 into 3.1.6 and create a new step at the end of the process to reflect the sample being finalised by the TAA.	The TAA do (and should) regularly review the sample for completeness and representative proportion.	3.1.11 & 3.1.6.	None – reflects as is process.
Remove steps 3.1.7 to 3.1.10.	These steps happen during the Inspection visit preparation described in 3.5. These steps do not happen during the main sample selection.	3.1.7 to 3.1.10.	None – reflects as is process.



BSCP27 Process Steps review

BSCP27 Section 3.2: Specific Sample Selection Process – SVA

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in BSCP27 redlining.	We no longer use fax or letters and would not want to. All communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Create a new step after 3.2.1 and before 3.2.2 that details the BSCCo telling the TAA what the Specific Sample will be within 5 WDs of the PAB mtg.	This is what we do now. In reality we discuss this with the TAA before we propose our recommendations to the PAB. We do confirm the decision post approval at the PAB Mtg.	Create a new step after 3.2.1 and before 3.2.2.	None – reflects as is process.
Include BSCCo in the "From" column (as appropriate).	There will be some occasions where the BSCCo will request the sample.	3.2.2	None – reflects as is process.
Include BSCCo in the "To" column (as appropriate).	There will be some occasions where the BSCCo will receive the sample details.	3.2.3	None – reflects as is process.
Create a new step between 3.2.3 and 3.2.4 detailing how the BSCCo will pass on any relevant details to the TAA for the Sample.	This is to reflect the fact that if the BSCCo does receive the detail, then we need to pass that detail on to the TAA. This reflects the current process.	Create a new step between 3.2.3 and 3.2.4.	None – reflects as is process.
Merge 3.2.6 with 3.2.5	These two steps are the same step of the process, only to different recipients (DC & MOA).	3.2.6 & 3.2.5	Some – will affect the wording in steps 3.2.7 and 3.2.9.
The reference in 3.2.7 (as is) is incorrect and should refer to 3.2.5 (or whatever step this turns out to be post BSCP27 redlining)	To reflect the changes of merging 3.2.6 and 3.2.5.	3.2.7	None – reflects as is process.
The reference in 3.2.9 (as is) is incorrect and should refer to 3.2.5 (or whatever step this turns out to be post BSCP27 redlining)	To reflect the changes of merging 3.2.6 and 3.2.5.	3.2.9	None – reflects as is process.



BSCP27 Process Steps review

BSCP27 Section 3.3: Determining of Metering Systems for Targeted Inspections

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in BSCP27 redlining.	We no longer use fax or letters and would not want to. All communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Amend the timescales in 3.3.4 to at least 10 WDs.	To reflect that it is a Targeted inspection that has come about because of suspected non-compliance.	3.3.4	Will impact on TAA processes. Will mean parties have to respond quicker to these types of inspection than "Main" sample inspections.
Merge 3.3.5 with 3.3.4	These two steps are the same step of the process, only to different recipients (DC & MOA).	3.3.5 & 3.3.4	Some – will affect step 3.3.8.
Amend to the timescales in 3.3.6 to within 5 WDs	To reflect that it is a Targeted inspection that has come about because of suspected non-compliance.	3.3.6	Will impact on TAA processes. Will mean parties have to respond quicker to these types of inspection than "Main" sample inspections.
Amend to the timescales in 3.3.7 to within 5 WDs for CVA and within 5 WDs or on the day of the inspection visit for SVA	To reflect that it is a Targeted inspection that has come about because of suspected non-compliance.	3.3.7	Will impact on TAA processes. Will mean parties have to respond quicker to these types of inspection than "Main" sample inspections.
Amend to the timescales in 3.3.8 to within 5 WDs	To reflect that it is a Targeted inspection that has come about because of suspected non-compliance.	3.3.8	Will impact on TAA processes. Will mean parties have to respond quicker to these types of inspection than "Main" sample inspections.



BSCP27 Process Steps review

BSCP27 Section 3.4: Selection of Metering Systems for Re-inspections

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in BSCP27 redlining.	We no longer use fax or letters and would not want to. All communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Remove the reference 'in accordance with the percentage' from 3.4.1 and put 'as' in its place.	To maintain flexibility.	3.4.1	None – reflects as is process.
Remove 3.4.2 and 3.4.3 from the process.	So that the BSCCo is not 'controlling' the TAA.	3.4.2 & 3.4.3	None – reflects as is process.
Merge 3.4.4 and 3.4.5.	These two steps are the same step of the process, only to different recipients (DC & MOA).	3.4.4 & 3.4.5	None – reflects as is process.
Merge 3.4.7 and 3.4.8	These two steps are the same step of the process, only to different recipients (DC & MOA).	3.4.7 & 3.4.8	None – reflects as is process
Amend reference in 3.4.4, 3.4.5, 3.4.7 and 3.4.8 to the new reference (will know this when the redlining is done)	To reflect the changes of merging 3.4.2 and 3.4.3.	3.4.4, 3.4.5, 3.4.7 & 3.4.8	None – reflects as is process

BSCP27 Process Steps review

BSCP27 Section 3.5: Inspection Visit

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in BSCP27 redlining.	We no longer use fax or letters and would not want to. All communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Add a footnote on 3.5.1 to note that Targeted Inspections require different timescales.	To reflect proposed changes to the Targeted Inspections Process.	3.5.1	None, this will just reflect the changes proposed in 3.4.
Include HHDC and CDCA into 3.5.1.	To reflect current process.	3.5.1	None – reflects as is process through the TAAMT.
Amend the timescales in 3.5.3 to 10 working days.	To prevent delays in the process and site visits from having to be cancelled or moved at the last minute because the information has not been provided in time.	3.5.3	Will impact on TAA processes. Will mean parties have to respond quicker.
Include the LDSO and / or Transmission Company, as required into 3.5.5.	To reflect current process.	3.5.5	None – reflects as is process.
Include "If the CDCC results in a (NC) initiate section 3.6, If it results in (NP), notify the relevant parties" into 3.5.9.	To reflect current process.	3.5.9	None – reflects as is process.
Remove "If a category 1 or 2 non-compliance identified, initiate process 3.6. If an observation is identified – notify the relevant parties If Inspection Visit is identified as compliant – notify the relevant parties."	To reflect current process.	3.5.9	None – reflects as is process.
Include CDCA into notifications in 3.5.9.	To reflect current process.	3.5.9	None – reflects as is process.
Include "Update" into the Information Required box.	To reflect current process.	3.5.9	None – reflects as is process.

BSCP27 Process Steps review

BSCP27 Section 3.6: Category 1, 2 and CDCC non-compliances

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in the redlining.	We no longer use fax of letters and would not want to – all communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Remove "notify LDSO where appropriate" in 3.6.1.	To provide clarity.	3.6.1	None.
Update information required by removing the reference to category 1 and 2 in 3.6.2.	So that it also covers the CDCC NC.	3.6.2	None – reflects as is process.
Update the reference in 3.6.3 to refer to 3.6.1 & 3.6.2.	To reflect the process.	3.6.3	None – reflects as is process.
Remove 3.6.3.	The TAAMT doesn't make the registrant 'Accept' the results? To reflect the process.	3.6.3	None – reflects as is process.
Update the reference in 3.6.4 to refer to 3.6.1 & 3.6.2.	To reflect the process.	3.6.4	None – reflects as is process.
Amend part b) of 3.6.4 to refer to the Query process and not the Appeal process.	To reflect the process.	3.6.4	None – reflects as is process.
Amend 3.6.7 to be: "Where no rectification plan or details of the rectification action taken are received, escalate the Registrant, MOA, and HHDC/CDCA to the BSCCo. a) BSCCo will inform the Registrant, MOA, and HHDC/CDCA that they have failed to provide adequate rectification details and will be reported to the BSCCo. b) The BSCCo will confirm to the Registrant that it is investigating the issue."			
In addition, add a footnote that this may be escalated to the PAB.	To reflect the process.	3.6.7	None – reflects as is process.
Include this into 3.6.9 c) "The BSCCo will confirm to the Registrant that it is investigating the issue."	To reflect the process.	3.6.7	None – reflects as is process.



BSCP27 Process Steps review

BSCP27 Section 3.7: Query Process – new step of the process to be added in to the BSCP

An appeal must be raised by the Registrant (though it can currently be presented by another party on the Registrants behalf). The Query process allows for any party to question aspects of the Inspection visits, namely the non-compliances. Often these queries are non-contentious and are to correct minor problems, that wouldn't benefit from the Appeals process (which can be costly to administer). These sorts of queries should not be subject to the appeal process, which requires the PAB to decide on the outcome. The TAA should operate the Query process to ensure that only irreconcilable problems are escalated to the PAB for decision through the Appeal process.



BSCP27 Process Steps review

Ref	When	Action	From	To	Information Required	Method
1.1	Following 3.6.4b	The Registrant, MOA, DC or LDSO (as appropriate) raises a Query with the TAA	Registrant MOA DC LDSO	TAA	Party details, Contact details and Supporting information	Online database or other agreed method
1.2	Within 5 WDs of 1.1	The TAA will review the information and record a summary of all discussions and information he has gathered	TAA		A summary of all discussions and information he has gathered	Online database or other agreed method
1.3	Within 5 WDs of 1.1 (and in parallel with 1.2)	The TAA will present his decision to the raising party	TAA	Registrant MOA DC LDSO	Supporting information	Online database or other agreed method
1.4	Following 1.3	The raising party will consider the TAAs decision, if he agrees, the TAA will leave the non-compliance open as it is considered valid.	Registrant MOA DC LDSO	TAA		Online database or other agreed method
1.5	Following 1.3	If the raising party disagrees with the TAAs decision, The TAA will initiate the Query arbitration process (which escalates the decision process to a senior member of the TAA)	TAA			Internal process
1.6	Within 5 WDs of 1.5	The TAA will review the information and record a summary of all discussions and information he has gathered	TAA		A summary of all discussions and information he has gathered	Online database or other agreed



BSCP27 Process Steps review

						method
1.7	Within 5 WDs of 1.5 (and in parallel with 1.6)	The TAA will present his escalated decision to the raising party	TAA	Registrant MOA DC LDSO	Supporting information	Online database or other agreed method
1.8	Following 1.7	The raising party will consider the escalated TAAs decision, if he agrees, the TAA will leave the non-compliance open as it is considered valid.	Registrant MOA DC LDSO	TAA		Online database or other agreed method
1.9	Following 1.7	If the raising party disagrees with the TAAs decision. The party may escalate to the BSCCo for consideration	Registrant MOA DC LDSO	BSCCo	Supporting information	By email or other agreed method
1.10	Following 1.9	The BSCCo will consider the raising party's issue and inform them of its decision.	BSCCo	Registrant MOA DC LDSO		By email or other agreed method
1.11	Following 1.10	If the raising party disagrees with the escalated TAAs decision. The party may want to raise an appeal to be considered by the PAB. Proceed to the Appeal Process (3.7)	Registrant MOA DC LDSO			Online database or other agreed method



TAM Service Review outcome

BSCP27 Section 3.7: Appeal Process

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in the redlining.	We no longer use fax of letters and would not want to – all communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Remove all references to the MOA.	Only the Registrant can raise Appeals (though it's expected that they will use the Supplier hub to support their Appeal).		None – This process has never been used.
Change all references to the PAB/Panel or Panel meeting to the PAB meeting.	The PAB will decide on the outcome (the Panel has discharged its obligations to the PAB).		None – This process has never been used.
New step before 3.7.1 to show that the BSCCo has received an Appeal.	To reflect current documented process.	New	None – This process has never been used.
Amend 3.7.1 to say that within 20 working days of receipt of the Appeal, and not 5 working days.	To reflect current documented process.	New	None – This process has never been used.
Remove step 3.7.2, and 3.7.3.	To make the process more economical (less iterations of the BSCCo considering the appeal)	3.7.2 & 3.7.3	None – This process has never been used.
Amend 3.7.3a & b to notify ONLY the Registrant and the TAA.	Only the Registrant can raise Appeals (though it's expected that they will use the Supplier hub to support their Appeal).	3.7.3a & b	None – This process has never been used.
Amend 3.7.7a and b to notify ONLY the Registrant and the TAA.	Only the Registrant can raise Appeals (though it's expected that they will use the Supplier hub to support their Appeal).	3.7.7a & b	None – This process has never been used.



TAM Service Review outcome

BSCP27 Section 3.8: Reporting Process

What	Why	Ref in BSCP27	Impact? (incl. affected parties)
All methods of communication should be 'email or as agreed' except where stipulated differently in the redlining.	We no longer use fax of letters and would not want to – all communication should come to us and to customers via email, the online database or as specifically stated in the BSCP27 redlining.	All Methods of communication.	None – reflects as is process.
Amend 3.8.3 to include HHDC for removal of Qualification. Changing the 'To' party to the applicable one.	For completeness	3.8.3	None – reflects as is process.