



# CP Report – CP1387

**Meeting Name** Supplier Volume Allocation Group

**Meeting Date** 5 March 2013

**Purpose of paper** For Decision

**Summary** This report provides details of the background, solution, impacts and industry views for CP1387 'Clarifications to the guidance and requirements for PARMS data submissions and reporting contained in BSCP533 and Appendices'. We invite the SVG to approve the CP for implementation in the June 2013 Release.

## 1. Why Change

### Background

[Change Proposal \(CP\) 1334](#)<sup>1</sup> introduced 12 new Performance Assurance Reporting and Monitoring System (PARMS) Serials. These new PARMS Serials were implemented on 1 July 2011 as part of the June 2011 Release. Changes to the SVA Data Catalogue (to remove old P-flows made obsolete by CP1334) became effective on 3 November 2011 as part of the November 2011 Release.

Once Suppliers and Supplier Agents began submitting the new PARMS Serials following the implementation of CP1334, and we initiated Technical Assurance PARMS drill-down checks, we realised that some ambiguity existed in Balancing and Settlement Code Procedure (BSCP) [533](#)<sup>2</sup> and its Appendices. To address this, we published a guidance note in December 2011. This guidance note provided the additional clarity that participants requested and added some additional details to each Serial.

We presented a paper at the December Performance Assurance Board (PAB) meeting (see [PAB143/05](#) and [PAB143/05 Appendix 1](#)) to discuss formalising the clarity within the BSCP. The PAB was supportive of progressing a CP to do this.

The SVG and the PAB have joint responsibility for BSCP533. We will seek the PAB's endorsement of CP1334 at its meeting on 28 February 2013 (see PAB145/08). We will update the SVG verbally on the PAB's discussions, as the PAB meeting is after SVG paper day.

<sup>1</sup> CP1334 'New PARMS Serials'.

<sup>2</sup> BSCP533 'PARMS Data Provision, Reporting and Publication of Peer Comparison Data'.

### What is the Issue?

It is our view that those that have not implemented CP1344, as clarified in the PARMS guidance, are non-compliant because they will have interpreted BSCP533 and its Appendices incorrectly. However, due to the ambiguity of the BSCP and its Appendices, it is difficult to enforce this without incorporating the clarity from the PARMS guidance into BSCP533 and its Appendices.

Although many PARMS data providers have been submitting Serials in line with the guidance, there is a risk that data providers incorrectly interpret the requirements of BSCP533 and its Appendices. This would lead to inconsistent reporting between Parties such that ELEXON and the PAB are not able to monitor performance as effectively, and may make decisions based on inaccurate PARMS data.

We have also taken the opportunity to correct some minor housekeeping errors.

We raised [CP1387 'Clarifications to BSCP533 and Appendices'](#) on 28 December 2012 to formally incorporate the details of the guidance note, and other areas on which we had received feedback, into the BSCP.

## 2. Solution

### Changes

CP1387 proposes changes to BSCP533, BSCP533 'Appendix A: PARMS Data Provider File Formats' and BSCP533 'Appendix B: PARMS Calculation Guidelines'.

These changes include:

#### BSCP533 / BSCP533 Forms (see redlining in Attachment A)

- Add all Supplier Agent roles to BSCP Form F533/01<sup>3</sup> to clarify the roles in which the participant operates;
- Add an option to F533/01 to state whether this contact replaces an existing one;
- Add a section to F533/06<sup>4</sup> for the Supplier to indicate if it is Half-Hourly, Non Half-Hourly or both; and
- Add an option to F533/06 to state whether this contact replaces an existing one.

<sup>3</sup> F533/01 'Data Provision Authorisation Form'.

<sup>4</sup> F533/06 'Peer Comparison Contact Authorisation Form'.

BSCP533 Appendix A (see redlining in Attachment B)

- Remove a reference to “t-1” reporting periods as these no longer exist and can cause confusion;
- Clarify the situation with submissions where a Supplier Agent is appointed, but no activity has occurred that month against a particular Serial;
- Correct the title of “DPI” files;
- Correct the File Type of HM12<sup>5</sup>, where a 0 has been missed; and
- Housekeeping changes – remove the now empty sections 5.23 to 5.32.

BSCP533 Appendix B (see redlining in Attachment C)

- Clarify in the introduction which Serials could include the unknown GSP Group (\_U) in submissions;
- Add a line to the SP04<sup>6</sup> section to clarify that, if there are no qualifying Meters within a GSP Group, a submission must still be made but with zero values;
- For each Serial, explicitly state how new connections and de-energised sites should be reported, and against which Standards;
- Clarify where Unmetered Supplies (UMS) should be included in the reporting;
- Provide a better description of what should be considered ‘Duplicate’ flows and how they should be reported;
- For SP12<sup>7</sup> and SP13<sup>8</sup>, explain how the D0148<sup>9</sup> flow can be used to identify that a new agent has been appointed;
- For HM12 and NM12<sup>10</sup>, clarify that on a Change of Measurement Class event the instance should not be included in reporting against Standards 2 to 7, as the “old” MTDs will not be used by the new agent;
- Add a paragraph to HM14<sup>11</sup> to note that this Serial should capture all D0002<sup>12</sup> flows, regardless of whether they directly relate to a D0001<sup>13</sup>; and
- Include further emphasis for the Serials which report only on a change of agent activity (rather than a change of Meter event).

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<sup>5</sup> HM12 ‘Missing HH MTDs’.

<sup>6</sup> SP04 ‘Installation of HH Metering’.

<sup>7</sup> SP12 ‘Timely Notification of Changes of the Data Aggregator via D0148’.

<sup>8</sup> SP13 ‘Timely Notification of Changes of the Meter Operator Agent via D0148’.

<sup>9</sup> D0148 ‘Notification of Change to Other Parties’.

<sup>10</sup> NM12 ‘Missing NHH MTDs’.

<sup>11</sup> HM14 ‘Timely HH Meter Investigation Requests’.

<sup>12</sup> D0002 ‘Fault Resolution Report or Request for Decision on Further Action’.

<sup>13</sup> D0001 ‘Request Metering System Investigation’.

### System Changes

This CP will not require any changes to PARMS or other BSC Systems. The CP may highlight to some participants that they have incorrectly interpreted the requirements, and in such cases will result in PARMS data providers needing to amend their systems.

### **Intended Benefits**

Implementing this CP will provide clarity. It will also ensure that ELEXON and the PAB can effectively use the PARMS data for measuring the performance of Suppliers and Supplier Agents, thereby taking appropriate decisions and actions based on the data.

## **3. Impacts and Costs**

### **Central Impacts and Costs**

The ELEXON implementation costs for CP1377 equate to £240 (1 man day of effort).

### **Party Impacts and Costs**

<b>Party Impacts</b>	
<b>Party Type</b>	<b>Impacts &amp; Costs</b>
Half Hourly Meter Operator Agent	Up to approx. £250k if system changes and changes to operational processes/training are needed. Minimal costs if already implemented.
Non Half Hourly Meter Operator Agent	
Half Hourly Data Collector	
Non Half Hourly Data Collector	
Supplier	
LDSO	No impact or costs

The Suppliers and Supplier Agents that are not already reporting in line with the guidance have indicated that they will need to make system changes and have some operational processes/training costs to implement CP1387. These changes are likely to be significant, with one respondent providing an implementation cost of approximately £250k.

Those that have already implemented the PARMS guidance may have minor changes to operational processes/training.



## 4. Implementation Approach

CP1387 is targeted for implementation on 27 June 2013 as part of the June 2013 Release.

RWE npower's response to the Participant Impact Assessment indicated that a longer period of a year is required to implement the CP, so that any new potential changes to PARMS which may be needed for smart metering (e.g. the proposed changes for CP1388<sup>14</sup>) can be made in a single update. CP1388 is seeking to implement new Meter Technical Details (MTD) dataflows for smart metering, and CPs 1387 and 1388 are both being considered by the SVG at its 5 March meeting.<sup>15</sup>

The PAB has yet to determine to what extent it wishes to fine-tune the existing Performance Assurance Techniques (PATs) to address any Settlement Risks associated with the implementation of smart metering. Although CP1388 will impact PARMS reporting, it is unknown what changes to PARMS (if any) will be progressed and when. For example, the PAB may decide that it does not need to measure missing smart MTDs. But if it decides that it does, it might decide to either:

- Include smart MTDs in PARMS Serial NM12<sup>16</sup>, which would require a change to that Serial; or
- Develop a separate Serial specifically for measuring missing smart MTDs.

Delaying the implementation of CP1387 until either the February or June 2014 Releases will affect the accuracy of reporting against the existing Serials for those that have yet to implement the guidance. As such, we do not believe it prudent to delay CP1387 and recommend implementing it on the 27 June 2013 as part of the June 2013 Release.

## 5. PAB's Initial Views

At its December 2012 meeting, the PAB was supportive of the CP. The PAB noted that there was no impact on the reporting of the PARMS Serials, if participants' submissions are accurately reflecting the PARMS guidance note. The PAB provided some comments on the CP, which we incorporated.

We will present the PAB's view from its February 2013 meeting at the 5 March SVG meeting.

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<sup>14</sup> CP1388 'Meter Technical Details for Smart Meters'

<sup>15</sup> See SVG paper 145/05.

<sup>16</sup> NM12 'Missing NHH MTDs'

## 6. Industry Views

ELEXON issued CP1387 for Participant Impact Assessment via CPC00722. We received 13 responses of which 10 agreed, one disagreed and two were neutral.

The following table shows the breakdown of responses. The original full collated participant responses to CP1388 are also available on the BSC Website [here](#) and in Attachment D.<sup>17</sup>

Summary of Responses for CP1387			
Organisation	Capacity in which Organisation operates (Supplier, Distributor, LDSO, etc.)	Agree?	Impacted ?
British Gas	Supplier, MOA	Yes	Yes
EDF Energy	Supplier, NHHDC	Yes	No
Electricity North West Limited	LDSO	Neutral	-
IMServ Europe	HHDC/DA/MOA, NHHDC/DA/MOA	Yes	Yes
Lowri Beck Services Ltd	NHHMO, NHHDC, NHHDA	Yes	-
Northern Powergrid	LDSO	Yes	No
Npower	Supplier, NHHDC, NHHDA, HHDC, HHDA and MOA	No	Yes
ScottishPower	Supplier, Supplier Agent, NHHDC	Yes	No
Siemens	NHHMOA, NHHDC, NHHDA, HHMOA, HHDC, HHDA	Yes	Yes
SSE Energy Supply	Supplier	Yes	Yes
SSEPD	LDSO	Neutral	No
Stark	HHDC/DA and NHHDC/DA	Yes	Yes
TMA	HHDC, HHDC, NHHDC and NHHDA	Yes	Yes

### Responses in support of CP1387

All but one of the respondents are supportive of the CP or are neutral. Two respondents highlight that it would make the PARMs reporting requirements clearer, and one notes that it should reduce the amount of D0268s<sup>18</sup> showing as missing.

<sup>17</sup> The version published on the BSC Website contains the non-confidential responses, while the version of Attachment D provided to PAB and SVG Members also contains a confidential response.

<sup>18</sup> D0268 'Half Hourly Metering Technical Details'

### Responses against CP1387

One respondent (RWE npower) does not support the CP. It believes that the CP:

- Makes significant changes to a range of the Serials; and
- Does not consider the potential further changes arising from the introduction of smart metering, specifically from CP1388, as mentioned above in Section 4.

On the first point, the CP incorporates the guidance previously issued to participants on how to interpret the BSCP. As such, we do not believe that this is changing the Serials, but providing clarification on the reporting of them as described in Section 1.

As explained in Section 4, the PAB has yet to determine exactly what PARMS changes will be needed to measure performance relating to smart metering. Without the implementation by all participants of the current Serials and clarifications provided by CP1387, existing PARMS data may be inaccurate.

### **Comments on the Proposed Redlining**

Attachment D includes all comments on the CP and the proposed redlined changes, our responses to them and our recommendations on any further action.

These recommendations are summarised as follows, and concern BSCP533 Appendix B:

- 2.1.1: This should also include clarification on the use of 'UUUU' for unknown agents/Suppliers;
- 2.1.1: Move HM14 to being one of the Serials where we could expect an '\_U' submission;
- 2.1.1: Keep SP11 as proposed;
- 3.4.4: Remove 'change of meter events should not be reported by this serial';
- 3.3.6 & 3.3.10: Clarify that for new connections there won't be an Old MOA, so agent 'UUUU' would be appropriate against Standard 1;
- 3.3.7-3.3.9: Clarify that there should be no submissions with agent 'UUUU', but OK for 'UUUU' Supplier; and
- Page 15, penultimate paragraph: amend typo '...submitted...' to '...submitting...'

## 7. Recommendations

### Assessment Review

After considering all of the Participant Impact Assessment responses, we recommend that the SVG approves CP1387 (with the redlining amendments described above and in Attachment D) for implementation in the June 2013 Release.

### Recommendations

ELEXON invites the SVG to:

- a) **APPROVE** CP1387 for implementation on 27 June 2013, as part of the June 2013 Release; and
- b) **APPROVE** the proposed amendments to BSCP533, BSCP533 Appendix A, and BSCP533 Appendix B, including the revisions identified in this paper and in Attachment D.

### Appendices:

None

### Attachments:

Attachment A – BSCP533 Redlining v0.1  
Attachment B – BSCP533 Appendix A Redlining v0.1  
Attachment C – BSCP533 Appendix B Redlining v0.1  
Attachment D – BSCP533 Appendix B Redlining v0.2  
Attachment E – CP1387 Consultation Responses (Confidential)

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