

# CP Assessment Report

## CP1424 'Amending the requirement for Data Aggregators to perform Full SMRS Refreshes'

**ELEXON**



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### Committee

Supplier Volume Allocation Group

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### Recommendation

Approve

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### Implementation Date

25 June 2015 (June 2015 Release)



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### Any questions?

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## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1424 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 3 February 2015. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1424.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A-C contain the proposed redlined changes to deliver the CP1424 solution.
- Attachment D contains the full responses received to the CP Consultation.

# 1 Why Change?

## Background

Non Half Hourly (NHH) and Half Hourly (HH) Data Aggregators (DAs) have expressed concern around the ongoing mandatory requirement for annual SMRS Refreshes and their associated performance impacts. Refresh instructions are often too large to send over the Data Transfer Network (DTN) and have to be sent on hard disks, which may entail additional work for some Supplier Meter Registration Agents (SMRAs). When applying a Refresh instruction, DAs are also required to suspend all other instruction processing from the point at which the SMRA issued the file.

Participants believe that overall data quality has improved to the extent that full SMRS Refreshes deliver limited benefit to Settlement. The level of inconsistencies between NHHDA/HHDA databases and the SMRS is such that most inconsistencies can be addressed more efficiently by selective (i.e. Metering System-specific) Refreshes.

## What is the issue?

NHHDAs and HHDA have expressed concern that the current mandatory process for SMRS Refreshes has led to an increase in the time required and level of operational disruption caused by applying full SMRS Refresh instructions, particularly for those agents operating in multiple SMRA areas.

This issue has been considered by the Software Technical Advisory Group (STAG) following ELEXON's concern that the SMRS Refresh process introduces significant delays for DAs in normal instruction processing. ELEXON notes that at the point where the SMRA generates the D0209 'Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator' flow, DAs have to suspend all other instruction processing until the Refresh has been received, tested and applied. This means that subsequent 'business as usual' D0209 flows from that SMRA received after the Refresh date have to be queued until after the Refresh has been applied, in order to preserve the correct sequence of instructions. Where a Refresh is too large for the DTN and has to be sent on a hard disk, this can mean a suspension of D0209 flows processing for a period of two weeks or more, and means that Settlement is likely to drift out of alignment until the backlog of unprocessed instructions have been cleared.

### Proposed solution

[CP1424 'Amending the requirement for Data Aggregators to perform annual full SMRS Refreshes'](#) proposes that, rather than Refreshes being performed for all agents and all SMRAs at regular intervals, indicators of material Settlement errors will be the trigger instead, such as D0095 'Non Half Hourly Data Aggregation Exception Report' and D0023 'Failed Instructions' flows. CP1424 will apply to both NHHDA and HHDAs.

Analysis to date has shown that, for one recent Party Agent, close to 98% of the changes made by the Refresh instruction were non-material, resulting only in minor changes to the Effective From Dates of certain fields (mainly GSP Group and Line Loss Factor (LLF) Class (LLFC)). Therefore, a shift to monitoring material errors is more in keeping with other forms of performance assurance carried out by ELEXON.

The new approach will be similar to the conditional application of the Dispute Final Settlement Run (DF) process for erroneously large Estimated Annual Consumption (EAC)/Annualised Advance (AA) Disputes, where Refreshes will be mandated only where the level of error in a particular GSP Group or SMRA area is considered to be excessive. SMRAs can raise concerns about the quality of SMRS data held by DAs and propose a Refresh, although the final determination as to whether the requirements have been met for exiting or invoking mandatory SMRS Refreshes will be made by ELEXON and the Performance Assurance Board (PAB).

ELEXON does not propose to use a pre-determined level of exceptions or quantity of Metering Systems, but simply to consider a full SMRS Refresh as one of a set of resolution options where Settlement accuracy is believed to be affected. For example, a BSC Audit could identify an increase in the number of D0095s or D0023s in a particular GSP Group, or the Auditor may observe common exceptions across multiple NHHDA for the same SMRA (or vice versa). In these cases, ELEXON would request a full Refresh(es) where it believed, after consultation with the SMRA and/or NHHDA in question, that it was needed to address the performance issue.

SMRAs and DAs will still be able to agree bilaterally to do periodic Refreshes at a time that is convenient to both parties. ELEXON or the PAB may also request a Refresh on an ad-hoc basis if there are indications through the observed number of D0095 or D0023 flows that there may be inaccuracies in the underlying SMRS data. In transitioning to the new arrangements, ELEXON will aim to ensure that DAs and SMRAs are satisfied that the data is sufficiently aligned prior to cessation of mandatory SMRS Refreshes.

### Proposed redlining

The proposed changes to [BSCP501 'Supplier Meter Registration Service'](#), [BSCP503 'Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'](#) and [BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'](#) to deliver CP1424 can be found in Attachments B, C and D.

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## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

CP1424 will require updates to BSCP501, BSCP503 and BSCP505 to implement the proposed solution. No system changes will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP501</li><li>BSCP503</li><li>BSCP505</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>

#### Central costs

The central implementation costs for CP1424 will be approximately £240 (1 man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

### BSC Party & Party Agent impacts and costs

#### Participant impacts

CP1424 will impact HHDAs, NHHDAAs and SMRAs. Eight of the ten respondents to the CP Consultation indicated that there would be impacts on their organisations as a result of implementing CP1424. However respondents noted that this would be a low impact which would involve minor changes to current processes.

Participant Impacts	
Participant	Impact
HHDAs	Changes will be required to implement the solution.
NHHDAAs	
SMRAs	

#### Participant costs

Three of the ten respondents to the CP Consultation indicated that there would be costs associated with CP1424, although they all indicated that these would be minor. These respondents noted that although there would be costs incurred in creating new processes, they would benefit from a cost reduction from CP1424's implementation by lowering the effort to manage, monitor and process the current volume of full Refreshes from SMRAs, which can be up to 25 per NHHDA over a 12-month period.

## 4 Implementation Approach

### Recommended Implementation Date

CP1424 is proposed for implementation on **25 June 2015** as part of the June 2015 BSC Systems Release, as this is the next available Release.

Respondents to the CP Consultation unanimously agreed with the proposed Implementation Date.

### Impact on Refreshes prior to the Implementation Date

Two respondents requested clarification as to whether NHHDA's will still be required to request a full SMRS Refresh under existing arrangements prior to the Implementation Date of CP1424. ELEXON's intended approach is that no new requests will need to be made following the Implementation Date. However, any requests by NHHDA's for a full SMRS Refresh made prior to the Implementation Date, but un-actioned at the time of the Implementation Date, will need to be completed.

## 5 Initial Committee Views

### SVG's initial views

The SVG considered CP1424 at its meeting on 2 December 2014 ([SVG166/04](#)). The SVG had no initial comments on the proposed changes, noting that they had arisen from an earlier discussion and action at [SVG156](#).

## 6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment D.

Summary of CP1424 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1424 proposed solution?	10	0	0	0
Do you agree that the draft redlining delivers the intent of CP1424?	10	0	0	0
Will CP1424 impact your organisation?	8	2	0	0
Will your organisation incur any costs in implementing CP1424?	3	6	1	0
Do you agree with the proposed implementation approach for CP1424?	10	0	0	0
Do you have any further comments on CP1424?	3	7	0	0

### Comments on the CP

Respondents to the CP Consultation unanimously agreed with the proposed changes for CP1424. Respondents commented that it is beneficial to remove the requirement for full Refreshes which it was noted have a limited benefit compared to the time, cost and effort involved, while still retaining a mechanism to be used when appropriate to ensure Settlement accuracy.

Two respondents commented that periodic checks should still be carried out to ensure that Settlement data has not degraded once full SMRS Refreshes are stopped. ELEXON believes that this would already be addressed through the BSC Audit process and through ad-hoc checks, where randomly selected SMRA/NHHDA combinations will be requested to run a full SMRS Refresh and send the output to ELEXON for review.

Three respondents also requested clarity on how ELEXON would apply the proposed materiality criteria for D0095 and D0023 data flow exceptions. ELEXON noted that its intention is not to adopt a fixed threshold but to instead look at instances where these exceptions have increased significantly, particularly if this is observed in a limited number of GSP Groups (or for certain Licensed Distribution System Operators (LDSOs)). However, this would not be determined remotely, but would instead arise out of the BSC Audit process, giving Suppliers and their agents sufficient advance notice that a full SMRS Refresh was under consideration.

ELEXON does not expect that NHHDA's will have to schedule multiple ad-hoc full Refreshes in close proximity. However, if this were to occur, ELEXON will liaise with the NHHDA and SMRA to address and resolve any scheduling issues.

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Two respondents also highlighted that the Instruction Processing Log File produced after a full SMRS Refresh has been applied is of limited use to identifying only those Metering Systems where a material change has been made. This is because around 97-99% of the output rows are non-material changes triggered by non-material changes to Effective Dates beyond the Final Reconciliation Volume Allocation Run (RF) Settlement period. ELEXON advised that this deficiency could be addressed by raising a separate CP, but in relation to CP1424, the replacement of full Refreshes with selective Refreshes largely mitigates this problem.

## Comments on the proposed redlining

Only one comment was received on the proposed redlined text. The respondent identified that there seems to be an inconsistency between the redlining of BSCP501 and BSCP503 and BSCP505. They noted that BSCP501 allows for a full Refresh of a shorter Settlement period than RF when mutually agreed between the DA and SMRA, whereas BSCP503 and BSCP505 do not include the mutually agreed full Refresh of any Settlement period.

ELEXON believes that the proposed redlined text is sufficient to make allowances for full SMRS Refreshes to be agreed without explicitly prescribing the date range for the data to be requested. The amendments to BSCP503 and BSCP505 were primarily to correct an earlier reference to a two-year period, which would mean refreshing data that had already passed RF. However, full SMRS Refreshes of a shorter Settlement period by mutual agreement could be accounted for by the addition of the qualifying text below:

<b>INFORMATION REQUIRED</b>
[...]
For full Refresh, all relevant data covering those Settlement dates for which a Final Reconciliation Run has not yet taken place at the time the full Refresh is generated, <b>or a shorter settlement period where applicable.</b>

However, as stated above, ELEXON does not believe this is necessary and that mutually agreed full Refreshes can be carried out without the addition of the qualifying statement. The draft redlined text for BSCP503 and BSCP505 in Attachments B and C have therefore not been amended.

## 7 Recommendations

We invite you to:

- **AGREE** with our view that no further changes are required to the BSCP503 and BSCP505 redlining following the consultation;
- **APPROVE** the proposed changes to BSCP501, BSCP503 and BSCP505 for CP1424; and
- **APPROVE** CP1424 for implementation on 25 June 2015 as part of the June 2015 Release.

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## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
AA	Annualised Advances
BSCP	Balancing and Settlement Code Procedure ( <i>document</i> )
CP	Change Proposal
CPC	Change Proposal Circular
DA	Data Aggregator ( <i>Party Agent</i> )
DF	Dispute Final Run ( <i>Settlement Run</i> )
DTN	Data Transfer Network
EAC	Estimated Annual Consumption
GSP	Grid Supply Point
HH	Half Hourly
LLF	Line Loss Factor
LLFC	Line Loss Factor Class
NHH	Non Half Hourly
PAB	Performance Assurance Board ( <i>Panel Committee</i> )
RF	Final Reconciliation Volume Allocation Run ( <i>Settlement Run</i> )
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
STAG	Software Technical Assurance Group ( <i>Panel Sub-Group</i> )
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group ( <i>Panel Committee</i> )

### DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0023	Failed Instructions
D0095	Non Half Hourly Data Aggregation Exception Report
D0209	Instructions to Non Half Hourly or Half Hourly Data Aggregators

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## External links

A summary of all hyperlinks used in this document are listed in the table below. All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
3	CP1424 page on the ELEXON website	<a href="http://www.elexon.co.uk/change-proposal/cp1424/">http://www.elexon.co.uk/change-proposal/cp1424/</a>
3	BSCPs page on the ELEXON website (BSCP501, BSCP503, BSCP505)	<a href="http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>

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