CP Assessment Report

CP1487 'Remove the exclusion of Change of Measurement Classes in BSCP533 Appendix B'

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1487 which ELEXON will present to the Performance Assurance Board (PAB) at its meeting on 31 August 2017 and the Supplier Volume Allocation Group (SVG) at its meeting on 5 September 2017. The PAB and SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1487.

There are three 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 PAB and SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1487 solution.
- Attachment B contains the full responses received to the CP Consultation.

ELEXON

Committees

Performance Assurance Board
Supplier Volume Allocation Group

Recommendation

Approve

Implementation Date

22 February 2018
(February 2018 Release)

Contact

Cal Lynn

020 7380 4206

cal.lynn@elexon.co.uk

PAB199/14

CP1487
CP Assessment Report

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1 Why Change?

Background

Two Performance Assurance Reporting and Monitoring System (PARMS) Serials, NM12 'Missing Non Half Hourly Meter Technical Details' (NHH MTDs) and HM12 'Missing Half Hourly Meter Technical Details' (HH MTDs) currently exclude instances that should be included.

Balancing and Settlement Code Procedure (BSCP) 533 Appendix B: Performance Assurance Reporting Monitoring Systems (PARMS) Calculation Guidelines outlines the requirements for Suppliers and Supplier Agents to provide reports to ELEXON that are used to monitor the BSC performance of Suppliers and Agents. The data provided in these reports is used by the Performance Assurance Administrator (PAA, ELEXON) and the PAB to assess Settlement Risks.

Each type of PARMS report measures a specific area, such as the transfer of MTDs between Supplier Agents. Each type of report is known as a Serial and each Serial has one or more measures known as Standards, such as the number of MTDs received within a reporting period.

Serials HM12 (BSCP533 Appendix B Sections 3.3.6 and 3.4.4) and NM12 (BSCP533 Appendix B Sections 3.3.10 and 3.4.5) monitor the volume of Unique Registration Missing MTDs upon a change of Meter Operator Agent (MOA) or Data Collector (DC) (Standard 1[1]), and how long MTDs have been missing for by Settlement Periods (Standards 2-7[2]).

Every Serial has a specific set of inclusions and exclusions. In the case of HM12 and NM12, missing MTDs upon a Change of Measurement Class (CoMC) should be included from Standards 2-7. However, they are currently excluded.

ELEXON has been investigating backing data voluntarily provided by the top four MOAs by Metering System Identifier (MSID) share, to investigate root causes of increasing volumes of missing MTDs which put them at risk of the Error, Failure and Resolution Technique being switched on.

ELEXON discussed the issue at the P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8' industry day on 19 July 2016 with MOAs, Suppliers and DCs. ELEXON spoke to seven of the MOAs present, who specifically noted that the reason nearly half of CoMCs were unable to be completed in a timely manner was due to the fact the old MOAs weren't sending MTDs. Two of the seven MOAs said that they could not tell what was a CoMC and what was not. This was discussed further with the group as a whole. It was asked if this was the case to everyone else present and all agreed.

ELEXON noted that this ties in with the increasing volume of missing MTDs being reported via HM12 and NM12. Of those MOAs present, all noted that they would always send MTDs if they had received them from the old MOAs. They also noted that they found it particularly difficult retrieving MTDs from old MOAs (on CoMC) in a timely fashion because

Metering System Identifier (MSID)

The Metering System Identifier (MSID) is the same as the SVA Metering System Number in the BSC. The BSC defines a SVA Metering System Number as a two digit number to identify the Distribution System, a ten digit Unique Reference Number provided by the Distributor and a check digit.

[1] Standard 1 'Number of D0155s received within the reporting period'
[2] Standard 2 'Number of D0155s not received before EFD within the period'
Standard 3 'Number of D0155s received between +1 WD and +16 WD from EFD (before SF)
Standard 4 'Number of D0155s received between +17 WD and +39 WD from EFD (before R1)
Standard 5'Number of D0155s received between +40 WD and +84 WD from EFD (before R2)
Standard 6 'Number of D0155s received between +85 WD and +154 WD from EFD (before R3)
Standard 7 'Number of D0155s received between +155 WD and +292 WD from EFD(before RF)

the old MOAs knew they should not be reporting this set of missing MTDs in NM12 and HM12.

What is the issue?

BSCP514 'Supplier Volume Allocation (SVA) Meter Operations for Metering Systems Registered in the Supplier Meter Registration Service (SMRS)' Section 7 notes that the NHHDC should only receive MTDs from a NHHMOA upon completion of a CoMC. It also notes that a HHDC should only receive MTDs from a HHMOA upon completion of a CoMC. At no point, should a HHDC or NHHDC receive MTDs from an MOA operating in an alternative market sector. This CP will align BSCP533 Appendix B with BSCP514.

Based on ELEXON's investigation, the exclusion upon a CoMC could put MTDs at risk of the EFR technique being switched on, prevent CoMCs being completed in a timely manner and prevent MOAs retrieving MTDs from old MOAs.

Error and Failure Resolution (EFR)

EFR is a key remedial technique in ELEXON's Performance Assurance Framework. It is used to assure ELEXON, the PAB and the rest of the industry that a participant understands identified performance issues and has robust plans in place to correct them in a timely manner. When a performance issue is identified and needs monitoring through EFR, we ask the participant to provide an action plan detailing the steps it will take to resolve the issue and the timescales for completion. By providing this information, we can monitor how they are doing with resolving the performance issues.

2 Solution

Proposed solution

This CP proposes to remove the exclusion of CoMCs from Standards 2-7 from NM12 and HM12 reporting for both DCs and MOAs.

Proposer's rationale

BSCP514 requires MOAs operating in alternative market sectors to transfer MTDs between MOAs in order to facilitate a CoMC from NHH to HH. When a CoMC takes place, if the new MOA is missing MTDs from the old MOA this prevents the new MOA from sending MTDs to the appropriate DC. Subsequently, the new DC will be unable to retrieve reads. Therefore, excluding missing MTDs upon a CoMC, as described in BSCP533 Appendix B Section 3, from HM12 and NM12 Serials reported by DCs is contradictory to processes set out in BSCP514 Section 7.

In accordance with BSCP514 Sections 7.1, 7.2, 7.3 and 7.4 and due to the risks found following ELEXON's findings after an investigation into backing data voluntarily provided by the top four MOAs by MSID, this CP proposes to amend HM12 and NM12 to include instances where there are missing MTDs upon a CoMC as reported by the DC.

Reference to D0268s and D0150s in HM12 and NM12 respectively as reported by MOAs has been amended to "MTDs" to reflect the alignment. Upon a CoMC, MOAs will expect MTDs from a different sector. Therefore, specifying MTD types goes against BSCP514.

Analysis into the migration path from NHH to HH via CoMC

Following the consultation responses, ELEXON has carried out analysis into the proportion of the NHH market that would still have to go through a CoMC as measured by HM12 at the time that this CP is proposed to be implemented on 22 February 2018. This analysis was carried out as some Consultation respondents were concerned about benefits of this CP following the Implementation of P272. The Supplier Migration update provided to the PAB on 29 June (PAB197/05A) noted that, as of midnight 1 April 2017, industry had a further 17,429 MSIDs to migrate, of which:

- 13,590 are PC5-8 Advanced Metered sites which do not fully comply with Ofgem's SLC12 requirements and therefore are not subject to the P272 obligation to migrate to HH Settlement; and
- 3,839 are CoMCs in progress over 45WD.

Therefore, ELEXON anticipates that, by the time this CP is implemented, nearly all the PC5-8 sites subject to the P272 obligation will have migrated to HH Settlement.

However, the "Technical Assurance Audit on the transfer of details for Automatic Meter Reading Meters" presented to the PAB in September 2016 (PAB188/09A) noted that, in addition to the 'advanced' Meter roll-out directive, Supply Licence conditions 12.23 and 12.24 required Suppliers to install 'advanced' Meters for all new Current Transformer (CT) Meter installations at any designated premises, commencing from 6 April 2014. Designated premises are defined as non-domestic premises in Profile Classes 1-4.

Aside from Supply Licence obligations, AMR Meters could also be installed in Profile Classes 1-4 at non-designated premises at the request of the Supplier or end consumer. Such optional AMR installations could be for billing or energy management purposes.

ELEXON does not know the exact number of AMR Meters installed in Profile Classes 1-4. However, based on D0150 flows sent over the Data Transfer Network (DTN), we have identified in excess of 600,000 Profile Class 1-4 sites that have Metering Systems referencing 'AMR' Meter Types. Based on the latest view from our database of NHH MTDs, we believe that this number is still in excess of 400,000 and will remain so at the time that this CP is implemented. Please note that we only hold D0150s sent over the DTN from March 2013, so it does not reflect a complete dataset.

We expect that the MSIDs subject to Supply Licence conditions 12.23 and 12.24 are also to be migrated to HH, and although the process under which they will migrate is yet to be determined, this could be a P272 style arrangement (i.e. standard BSC CoMC process governed by HM12), of which many will also involve a change of MOA.

While the total energy associated with these sites is lower than that for PC5-8, we believe that this is still a significant enough number of MSIDs to warrant the change to HM12 to ensure that MOAs report missing NHH MTDs (D0150s) as well as HH MTDs (D0268s). The fact that these sites are CT metered, and that the P272 CoMCs noted missing or incorrect CT ratios, mean that it would increase the risk that any missing MTDs as part of these migrations are not adequately tracked.

Proposed redlining

Attachment A contains the proposed changes to BSCP533 Appendix B to deliver CP1487.

The PAB and SVG jointly own this Configurable Item; hence we are presenting the CP to both Committees for approval.

The attached redlining has been prepared against BSCP533 Appendix B version 19.0. This is the latest baselined version of BSCP533 Appendix B that was released on 29 June 2017.

The original redlined changes were presented to PAB196 and SVG196 for information. Part of this redlined text included a non-material wording change to Sections 3.3.5 and 3.3.9, which was intended to provide clarity on the purpose of Serials HM11 and NM11. Three CP Consultation responses questioned these changes. It is ELEXON's belief that it is in best practice not to implement the proposed redlined text in Section 3.3.5 and 3.3.9, but revert to the current baseline in Section 3.3.5 and 3.3.9, as in BSCP533 Appendix B version 19.0, that refers to D0150.

This will not affect the intended solution of this CP, to remove the exclusion of CoMCs from Standards 2-7 in NM12 and HM12 reporting for both DCs and MOAs.

3 Impacts and Costs

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	System Impacts
• BSCP533 Appendix B	• N/A

Central costs

The central implementation costs for CP1487 will be approximately £240 (one ELEXON Working Day) to implement the relevant document changes. No BSC System changes are required.

BSC Party & Party Agent impacts and costs

Participant impacts

ELEXON initially anticipated that this CP would have no IT System impacts on Suppliers or Supplier Agents.

Following the CP Consultation, Suppliers and Supplier Agents have been identified as impacted by this change.

ELEXON received nine responses to the CP Consultation. Seven out of nine respondents said they would be impacted by this CP, needing to make IT system changes. The only Party who are solely a Supplier was not impacted, the rest are Supplier Agents or a combination of both Supplier and Supplier Agent. Three out of the seven impacted said the level of impact would be low. Two of the seven noted they would require large changes. The other two impacted respondents agreed with the solution of this change, but did not indicate the level of impact it would have on them.

The remaining two respondents did not identify any impacts associated with CP1487.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	IT system changes
Suppler Agent	IT system changes

Participant costs

All seven of the impacted respondents said they would incur some costs. Two respondents who agreed with the change highlighted that they would incur a low one-off cost. The remaining respondent said they would incur an initial one-off cost that would likely lead to follow-up costs due to amendments.

The remaining two respondents did not identify any costs associated with CP1487.

4 Implementation Approach

Recommended Implementation Date

CP1487 is proposed for implementation on **22 February 2018** as part of the February 2018 BSC Systems Release.

Five out of the nine respondents agreed with the proposed implementation approach for this CP. Those who agreed with the approach noted that this was sufficient time for them to implement changes.

One respondent who agreed with the overall proposal of this CP, disagreed with the implementation approach, believing that this CP should be implemented as early as possible to rectify the missing MTDs. Due to some respondents noting they need six months to implement this proposed change, February is the closest release date, as the November 2017 date would not allow sufficient time.

Three of the four respondents who disagreed with the implementation approach disagree with the overall CP.

One respondent asked which PARMS reporting period the changes would take effect from? The answer to this is the March 2018 reporting period. We have informed the respondent about this.

No respondents indicated that they would require longer than six months to implement the CP if it was approved. Even though we delayed bringing this CP for approval by a month, in order to undertake further analysis, Parties still have six months to implement the change if approved.

5 Initial Committee Views

PAB's initial views

The PAB considered CP1487 at its meeting on 25 May 2017 (PAB196/09).

ELEXON noted some Parties are struggling to remove CoMC instances from PARMS reporting as part of an automated process. Therefore, this change should reduce manual errors and reduce resource required for PARMS reporting. A PAB member questioned the benefit of the change and noted some Parties may use logic to exclude CoMC instances, so system and process changes would be required. ELEXON noted CP1487 will increase the accuracy of data and reduce ELEXON's need to check data. In addition there have been instances of MOAs using the current requirement of omitting CoMC instances from PARMS reporting as a justification for not sending full MTDs on a CoMC.

A PAB member noted P272 will be mostly completed by the time the change is implemented, asking about the benefits of the change. ELEXON noted implementing this change may avoid some problems encountered with P272.

A PAB member questioned if this change would be better included in the Performance Assurance Framework (PAF) review. ELEXON informed the PAB that the PAF review may or may not change PARMS and that we don't know when this review will take place. ELEXON also noted that this change looks further ahead to Profile Classes (PCs) 3-4 moving to HH Settlement.

A PAB member asked for the following questions to be included in the CP Consultation. These questions were included and can be found in the CP Consultation Response paper.

- If a system change is required to implement CP1487, how much would it cost?
- If a system change is required, how long would it take to implement?
- Do you think this CP will afford a benefit for Suppliers / DCs / MOAs?

SVG's initial views

The SVG considered CP1487 at its meeting on 30 May 2017 (SVG196/05).

An SVG Member asked how the DC will know that there has been a change of CoMC. Another SVG Member asked if there needs to be consideration of elective HH Settlement. ELEXON clarified that the CP will enable it to target MOAs that are not sending MTDs in a timely manner. This will allow the PAA to target the MOAs are not sending MTDs in a timely and efficient manner. It will allow it to see which ones are causing delays to the CoMC process by not sending MTDs as and when they should in line with BSCP514.

An SVG member asked for some information on the changes to Serials HM11 and NM11 in BSCP533 Appendix B to be included in the Consultation Paper. This was included in of the CP Consultation Paper, however ELEXON has now decided to remove these changes from the CP as this was a non-material change.

An SVG Member noted the proposed Implementation Date of February 2018, and asked how this fits with the PAF Review. ELEXON noted that the PAF Review is not due to conclude until late 2018 and its recommendations (which will then take further time to implement) are unknown. In the meantime, the issue around MTDs is not going away.

6 Industry Views

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

Summary of CP1487 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1487 proposed solution?	6	3	0	0
Do you agree that the draft redlining delivers the intent of CP1487?	7	1	1	0
Will CP1487 impact your organisation?	7	2	0	0
Will your organisation incur any costs in implementing CP1487?	7	2	0	0
Do you agree with the proposed implementation approach for CP1487?	5	4	0	0
If a system change is required, how long would it take to implement?	4	0	5	0
Do you think this CP will afford a benefit for Suppliers /DCs /MOAs?	6	2	1	0
Do you have any further comments on CP1487?	3	6	0	0

Comments on the CP

Six of the nine respondents agreed with the proposed changes for CP1487, the remaining three disagreed.

Of the six that agreed with the CP, benefits included ensuring operational standards are maintained, allowing reporting to be more robust and ensuring there is consistency with BSCP514.

In a follow-up conversation after the CP Consultation, one respondent noted that despite the P272 migration now being complete, there is still a benefit to implement this change as the purpose of this Serial is to report on missing MTDs impacting Settlement. If we are not reporting missing MTDs related to CoMC events that does not provide a complete picture.

The three who disagreed believe that the benefits of this CP do not justify the effort in making their system changes. Respondents highlighted that a broad review of PARMS Serials could come through the PAF Review and questioned if there is still a need for this CP past the P272 Implementation Date of April 2017. One respondent who agreed with the solution of this CP, noted that the PAF Review may look into amending PARMS, as this was discussed at Issue 69 'Performance Assurance Framework Review', however this has not been confirmed. Another respondent that disagreed with the solution of this CP said that no PARMS changes should be made prior to the conclusion of the PAF work stream regarding data provision for PAF purposes.

ELEXON is still expecting there to be around 16,000 CoMC as governed by HM12 at the time that this CP is implemented, including non-AMR Meters. ELEXON clarified that it is seeking to make the change in time for Profile Classes 3 and 4, as this will be a larger volume of sites than P272.

Do you agree that the draft redlining delivers the intent of CP1487?

Seven respondents agreed the draft redlining delivers the proposed solution to CP1487. One respondent does not believe it delivers the solution, while another made no comment.

Three respondents including the Party that replied 'No' to the redlining, highlighted an issue with the proposed change in Section 3.3.9. The change to this section does not impact the solution of the CP, being a non-material change.

After considering the responses, we recommend to not implement the proposed redlined text in this instance, but revert to the current baseline in Section 3.3.9.

Comments on the CP1487 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
3.3.9 purpose of the serial/Note	NM11 relates to NHH meter details D0150 "or D0268s sent for Change of Measurement Class from Half Hourly to Non-Half Hourly" should be corrected to "or ~~D0268~~D0150s sent for Change of Measurement Class from Half Hourly to Non-Half Hourly"	Three CP Consultation responses questioned changes to NM11 and HM11. It is ELEXON's belief that it is in best practice not to implement the proposed redlined text in Section 3.3.5 and 3.3.9, but revert to the current baseline in Section 3.3.5 and 3.3.9, as in BSCP533 Appendix B version 19.0, that refers to D0150.

If a system change is required, how long would it take to implement?

Four respondents answered yes to this question stating it would take each no longer than six months to implement this change. The remaining five remained neutral when answering this question.

Do you think this CP will afford a benefit for Suppliers/DCs/MOAs?

Six of the nine respondents believe this CP will benefit Suppliers/DCs/MOAs. The six respondents highlighted benefits such as having more accurate information around PARMS reporting and that the data should be used to provide transparency of those Agents who by their non-compliance have a poor performance in this area, which can have a direct impact as a risk to Settlement.

Two respondents did not believe this CP would bring a benefit. One cited that the changes are of no benefit to them as an Agent, as they use alternative real time monitoring and report controls, tailored to their requirements. The other respondent believed that by the time this CP would be implemented the volume of relevant events would be too small.

One respondent chose not to comment on this question.

7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP533 Appendix B for CP1487, including the non-material changes made following consultation;
- **APPROVE** CP1487 for implementation on 22 February 2018 as part of the February 2018 Release; and
- **NOTE** that CP1487 will be presented to the SVG on 05 September 2017 for decision.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
AMR	Automatic Meter Reading
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CoMC	Change of Measurement Class
CT	Current Transformer
CP	Change Proposal
DC	Data Collector
DTN	Data Transfer Network
EFR	Error and Failure Resolution
HH	Half Hourly
HHDC	Half Hourly Data Collector
HHMOA	Half Hourly Meter Operator Agents
HH MTDs	Half Hourly Meter Technical Details
MOA	Meter Operating Agent
MSID	Metering System Identifier
MTDs	Meter Technical Details
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector
NHHMOA	Non Half Hourly Meter Operating Agent
NHH MTDs	Non Half Hourly Meter Technical Details
PAB	Performance Assurance Board
PAF	Performance Assurance Framework
PARMS	Performance Assurance Reporting Monitoring System
PC	Profile Class
SMRS	Supplier Meter Registration Service
SMETS	Smart Metering Equipment Technical Specifications
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group

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
2	Balancing and Settlement Code Procedure (BSCP) 533 Appendix B: Performance Assurance Reporting Monitoring Systems (PARMS) Calculation Guidelines.	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/?show=all
2	BSCP514 'Supplier Volume Allocation (SVA) Meter Operations for Metering Systems Registered in the Supplier Meter Registration Service (SMRS)'.	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/5/?show=10&type
4	P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'.	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
4	PAB197/05A Supplier Migration Updates.	https://www.elexon.co.uk/wp-content/uploads/2016/10/02_PAB197_05a-Public-SMU-V2.pdf
4	Ofgem Licences Codes and Standard	https://www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions
4	PAB 188 meeting on 29 September 2016.	https://www.elexon.co.uk/meeting/pab-188/?from_url=https://www.elexon.co.uk/events-calendar-item/pab-188/
5, 9	PAB 196 meeting on 25 May 2017.	https://www.elexon.co.uk/meeting/pab-196/
5, 9	SVG 196 meeting on 30 May 2017.	https://www.elexon.co.uk/meeting/svg-196/
10	Issue 69 webpage of ELEXON website.	https://www.elexon.co.uk/smg-issue/issue-69/