Requirements Specification to Support Modification Proposal P88: Introduction of obligations in relation to SVA Metering, Meter Operator Agents and Equipment Owners

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a Authorities

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Name	Organisation
VAMG	
Parties	
Party Agents	
BSC Central Service Agent (SVAA)	
Core Industry Document Owners	

c Related Documents

Reference 1	P88 Modification Proposal (31 June 2002)
Reference 2	P88 Initial Written Assessment (P088IB) (7 June 2002)
Reference 3	REMA Expert Group Recommendations (30 May 2002)

d Intellectual Property Rights and Copyright

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1 INTRODUCTION

1.1 BACKGROUND AND SCOPE

This Requirements Specification for Modification Proposal P88 'Introduction of Obligations in relation to SVA Metering, Meter Operator Agents and Equipment Owners' (P88) (Reference 1) outlines the proposed solution to be used in a consultation and parallel Detailed Level Impact Assessment (DLIA).

P88 was raised by Scottish and Southern Energy on 31 May 2002 as a result of a Review of Electricity Metering Arrangements (REMA), which seeks to increase competition between metering services in the non-half hourly market by establishing a clear separation between Meter Asset Provision (MAP) and Meter Asset Maintenance (MAM). The scope of the REMA work has focused on the progression of technical changes to MRASCo products including the Master Registration Agreement (MRA), although suspected impacts on BSCCo products have been identified. Therefore, the purpose of P88 is to outline the proposed changes to the Code, BSC Systems, Code Subsidiary Documents and other configurable items such that the MRASCo and BSCCo products remain consistent and it is ensured that Settlement is not compromised by REMA.

The Initial Written Assessment for P88 (Reference 2) was presented to the Panel on 13 June 2002, where it was agreed that P88 be submitted to a 2-month Assessment Procedure.

1.2 PURPOSE AND STRUCTURE OF DOCUMENT

The purpose of this document is to specify in detail the proposed changes to the Code, BSC Systems, Code Subsidiary Documents and other configurable items, such that all impacted BSC Agents, Parties and Party Agents may undertake a parallel consultation and DLIA on the changes required to support P88.

1.3 GLOSSARY

The following acronyms have been used throughout this document:

BSCCo	Balancing and Settlement Code Company
DTC	Data Transfer Catalogue
DLIA	Detailed Level Impact Assessment
GSP	Grid Supply Point
MAM	Meter Asset Maintenance/Maintainer
MAP	Meter Asset Provision/Provider
MDD	Market Domain Data
MDDM	Market Domain Data Manager/Management
MOA	Meter Operator Agent
MRA	Master Registration Agreement

MRASCo	Master Registration Agreement Service Company
MSID	Metering System ID
REMA	Review of Electricity Metering Arrangements
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent

2 REQUIREMENTS SPECIFICATION

P88 seeks to modify the Code and its associated documents and associated systems to recognise a split between the services of non-half hourly MAP and MAM, which in practice would be provided by Equipment Owners and NHH Meter Operator Agents (MOAs) respectively. At present MAP and MAM are only provided as a single 'meter operation' service by NHH MOAs. Where a Supplier needs a meter to be installed, it will make a request to an MOA who in turn will acquire a meter from an undefined source (i.e. a MAP) and pass on any costs to Suppliers as part of its general MOA charges. As a result Suppliers have no direct input into the acquisition of meters by MOAs and organisations wishing to provide MAM services become obliged to take on unwanted MAP responsibilities (or vice versa). The intention of P88 is that creating a split between MAP and MAM would produce greater transparency in metering costs, allow more choice to Suppliers and metering organisations, generate increased competition and therefore reduce prices across the electricity supply industry.

The impact on Parties and Party Agents will be determined based upon responses to a DLIA, but is believed to depend upon the level of validation conducted upon electronic dataflows. In addition Parties will be requested to undertake a parallel consultation and DLIA to assess impacts and establish whether or not P88 better achieves the Applicable BSC Objectives.

The impact on the BSC Agents is limited to the Supplier Volume Allocation Agent (SVAA) and is expected to be minimal. An impact assessment will be requested from the SVAA to confirm the specific changes required to their systems and / or processes.

2.1 Requirements Specification Overview

The overall requirement of P88 is to introduce high-level obligations into the Code that will complement changes to the MRA and provide a level of visibility of the new arrangements such that existing Settlement processes are not compromised.

The definition of an MOA as defined in the Code is:

> "a Party Agent appointed in accordance with Section L to install, commission, test and maintain, and rectify faults in respect of, CVA Metering Equipment and/or SVA Metering Equipment".

This definition is the same as that of MAM given in the REMA Expert Group Recommendations (Reference 3), therefore the Code definition of MOA will not require any alteration as a result of REMA.

The REMA Expert Group Recommendations explain the definition of MAP as follows:

> 'The MAP is responsible for providing metering equipment, which is fit for the purposes of satisfying the settlements process, the requirements of the relevant Use of Systems Agreement and the relevant Acts and Regulations.'

It further clarifies this definition by explaining that:

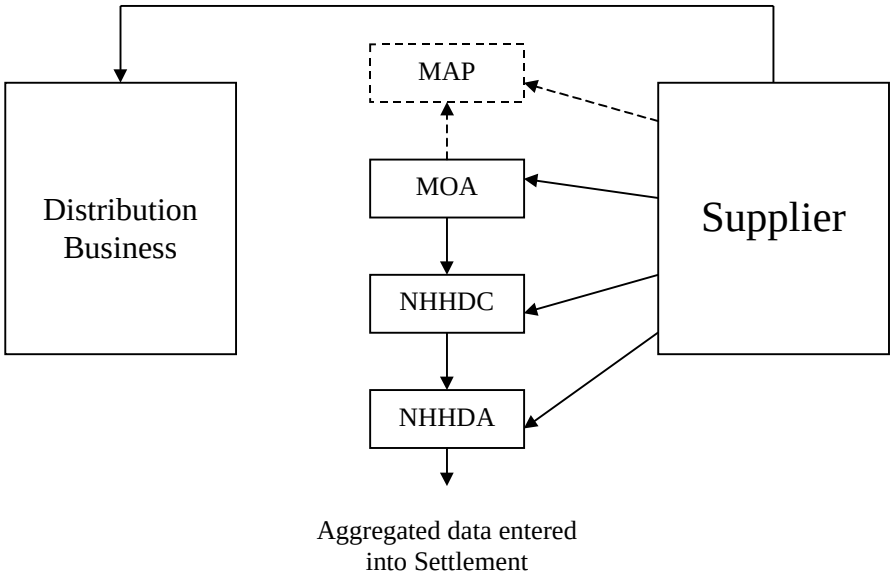
> 'A person or persons supplying electricity-metering equipment does not become the MAP proper for that metering equipment unless, or until such time as, the metering equipment is made available to a MAM for installation at a relevant metering position. Once a person has become a MAP for a piece of metering equipment they remain the MAP until such time as either: (a) they sell the metering equipment, (b) the metering equipment is returned to them by the MOP [i.e. the MOA]. In this way MAP equals meter owner and meter owner equals MAP.'

This allows the existing Code-defined term 'Equipment Owner' to be used to describe the MAP at a high level without having to create new definitions.

2.1.1 Impact on Processes

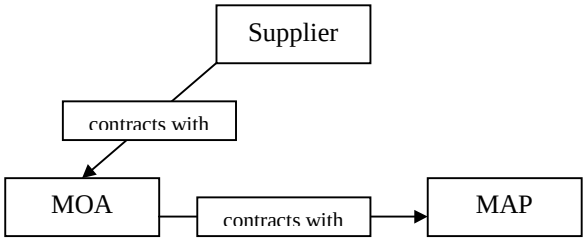
Analysis conducted by REMA has identified the impact of a MAP/MAM split on the current processes relating to meter operation and registration.

The Supplier Hub for the non-half hourly market consists of Suppliers, MOAs, Non-Half Hourly Data Collectors (NHHDCs), Non-Half Hourly Data Aggregators (NHHDAs) and Distribution Businesses:

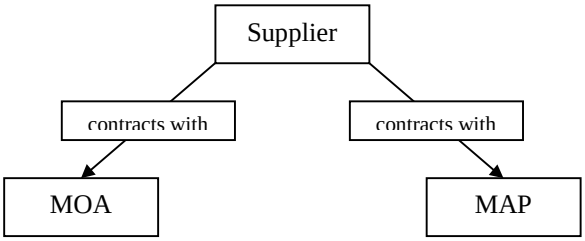


Once a Metering System has been registered and the Supplier has appointed its Supplier Agents (MOAs, NHHDCs and NHHDAs), metered data can be collected, aggregated and entered into Settlements.

The way in which a MAP would interact with this arrangement depends on the Supplier:



Arrangement 1



Arrangement 2

In Arrangement 1, the Supplier has no specific MAP requirements and so only contracts the services of an MOA. This would be on the basis that, should a new meter be required, the MOA would source a meter from a MAP in addition to carrying out its usual meter maintenance duties. Costs incurred by the MOA in obtaining a meter would be passed on to the Supplier as part of the overall MOA charge.

In Arrangement 2, the Supplier has decided to directly appoint a MAP and has established a contract. The Supplier would be charged direct for MAP services, and the MOA would be instructed by the Supplier to source meters for a given metering point from the designated MAP.

The scenarios described below explain the way in which both of these contractual models would be supported in the various registration-related processes.

The full details of each scenario are contained in the REMA Expert Group Recommendations (Reference 3).

a. New Connections

A Supplier takes on an MSID and appoints a MAM, agreeing the metering requirements. The MAM would request metering equipment from a MAP according to the contract the MAM has with the Supplier. If the appointed metering organisation has a contract to provide both MAP and MAM services then it will select the MAP of his choice. However, if the organisation has only been contracted to provide a MAM service, it will source the meter from a MAP specified by the Supplier.

Once the meter has been installed and energised at the required location, the MAM will notify the MAP and will also inform the Supplier and Distribution Business of the successful installation, passing on the MAP ID for information. The MAM will also provide Meter Technical Details and an initial Meter Reading to the NHH Data Collector.

In addition, there will be a new requirement analogous to that existing in the half-hourly market such that prior to a new metering point being registered in SMRS, the consent of the MAP must be obtained by the Registrant (usually the Supplier) as a condition of registration.

b. Change of Meter with no change of MAP

A change of meter is effectively a meter removal followed by a meter installation. When a MAM removes a meter following a request from a Supplier, it will inform the MAP, telling it who the Supplier was (or still is, depending on the circumstances) and at some point will return the meter according to the commercial arrangement the MAM had with the MAP. Once a new meter has been acquired from a MAP and installed by the MAM, the MAP ID will be issued to the Supplier and Distribution Business in the same way as for a new connection.

If a meter is faulty and has to be replaced, but a new meter cannot be obtained from the MAP (for example, if a fault occurred outside working hours), the MAM must take steps to ensure that the supply is not left without a meter. Ideally, the contract established between the Supplier or MAM and the MAP would give the MAM 24-hour access to a meter store, in which case a new meter could be easily obtained and installed. If no such arrangements exist, and only one meter was ever provided for that metering point (i.e. no spares were delivered to the MAM), the MAM would have to source a meter from any MAP it can find and install it for an interim period. On the next Working Day, the original MAP would be notified of the events and would have to decide what action should be taken. This could lead to another change of meter and even a change of MAP if a meter sale is required.

c. Change of MAM

Following de-appointment by the Supplier, the old MAM will notify the MAP that they will cease to be responsible for meter maintenance from a certain date, and at the direction of the Supplier, will pass on the MAP ID to the Supplier and the new MAM. The new MAM will then inform the MAP that it is taking on responsibility for maintenance of that meter.

d. Change of MAP (triggered by sale of Meter)

If a MAP decides to sell a meter, it will inform the MAM and let him know the identity of the new MAP. The MAM will then issue a notice to the new MAP, explaining that the Supplier has appointed it as the agent responsible for all maintenance on that meter. Finally, the MAM would notify the Supplier and Distribution Business of the identity of the new MAP.

e. Change of MAP (triggered by change of Meter)

This process would begin with a Supplier requesting a change of meter to the MAM, who in turn would remove the meter and return it to the MAP. Once this has been done, the MAM would acquire a new meter from a new MAP, either at the direction of the Supplier or on its own initiative (depending on the MAM's contract with the Supplier). The MAM would then install the meter, giving notice to the MAP, the Supplier and Distribution Business once installation is complete.

f. Change of Supplier (with no other changes)

If the MAM is notified of a change of Supplier, it will inform the MAP that the MAM contract with the Supplier has ended. Once the MAM is re-appointed to the Metering System by a New Supplier, the MAM can notify the MAP and in doing so pass over the New Supplier ID. The MAM will confirm this arrangement by passing on the MAP ID to the Supplier and Distribution Business.

g. Change of Supplier coincident with Change of MAM

As in the Change of Supplier scenario, the MAM will inform the MAP that the contract with the Supplier has ended. The New Supplier will then initiate a change of MAM process: a new MAM will be appointed and the old MAM will be required to pass on the Meter Technical Details and the MAP ID to the New MAM. This allows the New MAM to contact the MAP, stating the New MAM ID and the New Supplier ID for that Metering System. Once again, the MAP ID will be passed on to the Supplier and Distribution Business by the MAM for confirmation and record purposes.

The key requirement for each of these scenarios is that Parties (i.e Suppliers and Distribution Businesses) or Party Agents (i.e MOAs and NHHDCs) are all made aware of the identity of the different organisations appointed to a Metering System and of any changes made to the appointments. The present arrangements allow for the distribution of MOA IDs to the relevant participants; the change required in order to support a MAP/MAM split is to allow the MAP ID to be distributed.

The analysis undertaken by REMA on the different scenarios has identified that the D0150 'Non Half Hourly Meter Technical Details' dataflow would lend itself well to the distribution of the MAP ID. The triggers and usage of the D0150 are identical to that of any new flow that would be needed specifically to communicate the MAP ID to the relevant participants. Therefore, in the interest of minimising unnecessary change, it is proposed that the MAP ID be added to the D0150 flow.

In relation to MOAs and Equipment Owners in their role as MAM and MAP, communicating the MAP ID will require the creation of new flows, provisionally named DXXX1 and DXXX2 in the REMA Recommendations (Reference 3). Unlike MOAs, Equipment Owners are not Party Agents and lie outside the governance of the Code, and it is not considered appropriate to specifically define such dataflows in Settlement documentation. However, the necessary requirements can be met in the BSC by placing obligations on MOAs to contact Equipment Owners in relation to any work carried out on Metering Systems.

The obligation to obtain the Equipment Owner's consent as described in scenario (a) is required so as to allow the location of assets to be easily traced. Prior to the initial registration in SMRS, the metering point will not have been officially defined and so there is no way for the Equipment Owner to accurately identify the location at which its asset is to be installed. It may have provided a meter to an MOA on the basis that it was only installed in a certain area (such as a specific GSP Group), and so by obliging the Registrant to obtain the Equipment Owner's consent the process would ensure that no unauthorised installations occur. Once an MSID has been designated and registered in SMRS, the location of the asset is made clear and any subsequent Equipment Owners can easily determine where there assets are being installed.

This consent need not be on an individual metering point basis. For convenience Equipment Owners may be prepared to grant blanket consents, for example specifying the GSP Group(s) within which their meters may be installed. The arrangement decided upon is entirely a matter for the Equipment Owner and Registrant concerned and would not be mandated in the Settlement documentation.

Note that, in all of these scenarios, the role of the NHH Data Collector is unchanged. The identity of the MAP would be of no interest to the NHHDC as the MAP has no control over the quality of data being generated by the Metering Equipment – this would remain the responsibility of the MOA. As in the current arrangements, changes of MOA would be notified to NHHDCs via the D0150 flow.

2.1.2 Impact on Parties / Party Agents

All those participants using the D0150 'Non Half Hourly Meter Technical Details' dataflow, i.e. MOAs, Distribution Businesses, Suppliers and NHH Data Collectors would be impacted by the addition of the MAP ID. Although Suppliers can choose not to select MAPs directly and leave the decision to their appointed MOA, they must ensure that once the 'MAP ID' field in the D0150 dataflow is populated, their systems will not reject the flow as being invalid.

Information used to populate a dataflow such as the D0150 must also be recorded in Market Domain Data (MDD). Therefore, the details of each MAP, whether contracted directly by the Supplier or indirectly via the MOA, must be entered into MDD in accordance with BSCP509 (Changes to Market Domain Data).

In turn, this means that the Supplier, being a BSC Party and therefore a signatory to the Code, would hold the responsibility for submission of MAP IDs into MDD rather than the MOA. However, it is a basic Supplier Hub principle that Parties and Party Agents are required to share information in order to fulfil their Settlement obligations. Therefore, the MOA would be required to pass on enough information about a MAP to the Supplier such that a reasonable MDD Change Request may be submitted to BSCCo.

2.1.3 Scope of P88

P88 focuses on the non-half hourly market where the need for increased competition between metering services is considered to be greater. In practice, a de facto MAP/MAM split has existed in the half-hourly market for many years but has remained invisible to Settlement and a need for greater transparency in the HH market has not been identified.

2.1.4 MRASCo Requirements

In line with the REMA Expert Group Recommendations, the following Change Proposals were raised to progress alterations to MRASCo products:

- DTC CP3139 - Amend dataflow D0150 to provide the identity of the Meter Asset Provider when meters are installed or removed. Add new data item for Meter Asset Provider and corresponding update to Annex A.
- DTC CP3141 - Add a new data flow to the DTC "Notification of Meter Operator, Supplier and Metering Assets Installed/Removed by the MOP to the MAP.

- DTC CP3142 - Add a new data flow to the DTC "Notification of Meter Asset Provider" which will be sent from a Meter Asset Provider (MAP) to a Meter Operator (MOP).
- CP108 - Update MOP definition in line with REMA.

The MRASCo Development Board approved the changes on 27 June 2002 with the exception of DTC CP3141. Following participant review, this CP has been redrafted to clarify the proposed structure of the new dataflow and has been raised (under the same title) as DTC CP3148. This will be presented for approval at the next Board meeting on 25 July 2002.

The Implementation Date agreed for DTC CPs 3139, 3142 and MRA CP108 is 29 May 2003. This is also the proposed Implementation Date for DTC CP3148.

3 CHANGES REQUIRED TO BSC SYSTEMS

This section defines the amendments that would be required to the BSC Systems in order to implement P88.

3.1 Market Domain Data Management (MDDM)

The MDDM system operated by the SVAA would require alteration in order to recognise MAP as a valid Market Participant Role. This requires the Market Participant ID field in MDD to be populated with the identifiers of those organisations performing a MAP role, and thus in effect creating a MAP ID.

If an Equipment Owner is also the Customer, then a MAP ID of 'CUST' would be used. When used in the D0150 dataflow this would allow Customer-owned meters to be identified easily.

These requirements will be progressed via the existing MDD Change Request process detailed in BSCP509, so the impact on the SVAA would be minimal with the change constituting business as usual. There is no proposed change to the MDDM for MAM identification, as MOAs will continue to perform this role.

4 CHANGES REQUIRED TO THE CODE, CODE SUBSIDIARY DOCUMENTS, CORE INDUSTRY DOCUMENTS & OTHER CONFIGURABLE ITEMS

This section defines the amendments that would be required to the Code, Code Subsidiary Documents, Core Industry Documents and other configurable items.

4.1 Code

There would be an impact on the following Sections of the Code:

4.1.1 Section K 'Classification and Registration of Metering Systems and BM Units'

This Section would be altered to reference the Equipment Owner's role in the initial registration of an SVA Metering System in SMRS. Prior to registration, where a Metering System ID is provided to the SMRA by a Distribution Business, the Equipment Owner's consent should be obtained, ensuring that Equipment Owners are fully aware and agree to the location of their assets.

In addition, a new clause would be required stating that non-half hourly Metering Systems must be installed and maintained in accordance with the relevant Code of Practice (see section 4.2.3 below).

4.1.2 Section L 'Metering'

This Section would be modified to require MOAs to keep Equipment Owners informed of the status of their Metering Systems and of any fieldwork carried out them. In cases where the Equipment Owner is also the Customer, the Supplier rather than the MOA would hold this responsibility.

4.1.3 Section S 'Supplier Volume Allocation'

New requirements would be added to this section. For each SVA Metering System for which it is responsible, the Supplier must give details of the Equipment Owner to the SVAA in accordance with BSCP509 for inclusion in Market Domain Data. Where a Customer is the Equipment Owner, the Supplier will also be responsible for informing the Customer of any fieldwork carried out by the MOA on their Metering System.

4.2 Code Subsidiary Documents

The following Code Subsidiary Documents would be impacted and any changes required would be developed by ELEXON after the Authority approved P88.

4.2.1 Party Service Line PSL110 (SVA Meter Operation)

PSL110 would elaborate on the high-level MOA obligations introduced in Section L of the BSC:

- Sections 1.4.2 and 1.5.2 would be altered to specify that Equipment Owners, as well as Suppliers, NHHDCs and Distribution Businesses, should be informed if and when a Metering System is installed, removed, repaired, replaced, reconfigured or nearing the end of its Certification life;

- Section 1.2 (Market Domain Data Obligations) would be altered to require that MOAs provide information on Equipment Owners to Suppliers, allowing data to be entered into MDD on their behalf.
- Section 1.1.3 'Accuracy of Non Half Hourly Meters' would be modified to state that the accuracy of each NHH SVA Meter should be compliant with the relevant Code of Practice;
- Section 1.1.6.1 'Audit and Record Keeping' would be altered to ensure that MOAs make information available to the Equipment Owner.

4.2.2 BSC SVA Data Catalogue

The D0150 'Non Half Hourly Meter Technical Details' dataflow would be amended to include the MAP ID amongst its data items. The use of MAP rather than Equipment Owner in this case is preferred so as to avoid unnecessary inconsistency between the BSC SVA Data and the MRA DTC.

It is not proposed to introduce the two new DTC dataflows within the BSC SVA Data Catalogue as these are not related to Settlement, and therefore the governance for changing these flows will lie with MRASCo.

4.2.3 Codes of Practice (CoPs)

A new Code of Practice (CoP8), covering the standards required of non-half hourly metering, will be introduced alongside the existing CoPs. A draft version of the CoP is being developed, outlining the criteria against which the standard of NHH metering equipment and associated facilities will be measured.

4.3 Changes to Core Industry Documentation

Changes to the MRA and the MRA Data Transfer Catalogue are being progressed via the MRASCo change control process. These changes are necessary to deliver the overall REMA Expert Group Recommendations.

4.4 Changes to Other Configurable Items

The Business Process Model may require amendment to reflect the proposed arrangements.