Meeting name	BSC Panel
Date of meeting	14 February 2008
Paper title	Report on Issue 31 'Provision of Annualised Advance and Estimated Annual Consumption Data to LDSO'
Purpose of paper	For Information
Synopsis	Issue 31 was raised to consider the potential provision of Estimated Annual Consumption and Annualised Advance data to Distribution System Operators via the D0019 'Metering System EAC/AA data' flow. A majority of the Issue 31 Group members supported a Modification Proposal being raised in this area. This paper summarises the Group's discussions and conclusions. Following the Group's meeting, Modification Proposal P222 'Provision of EAC and AA data to Distributors' has subsequently been raised by the Proposer of Issue 31.

1 Introduction

1.1 Standing Issue 31 was raised by the Energy Network Company ('the Proposer') on 27 November 2007 for consideration by the Volume Allocation Standing Modification Group ('the Group').[1] Due to the volume of other changes being progressed, and difficulties in convening a meeting during the run-up to the Christmas period, the Group did not meet to consider Issue 31 until 14 January 2008. This paper summarises the discussions and conclusions of the Group at its meeting, and is presented to the Panel for information.

1.2 Currently, Estimated Annual Consumption (EAC) and Annualised Advance (AA) consumption data is provided by Non Half Hourly Data Collectors (NHHDCs) to Suppliers and Non Half Hourly Data Aggregators (NHHDAs) through the D0019 'Metering System EAC/AA data' flow. Modification Proposal P43 was raised by Western Power Distribution in October 2001 proposing that EAC/AA data should also be provided to Distribution System Operators (DSOs).[2] This proposal was rejected. At the time one of the key reasons for rejection was the lack of support. However, it appeared to be acknowledged that this was an issue which could be revisited at a later stage if circumstances changed.

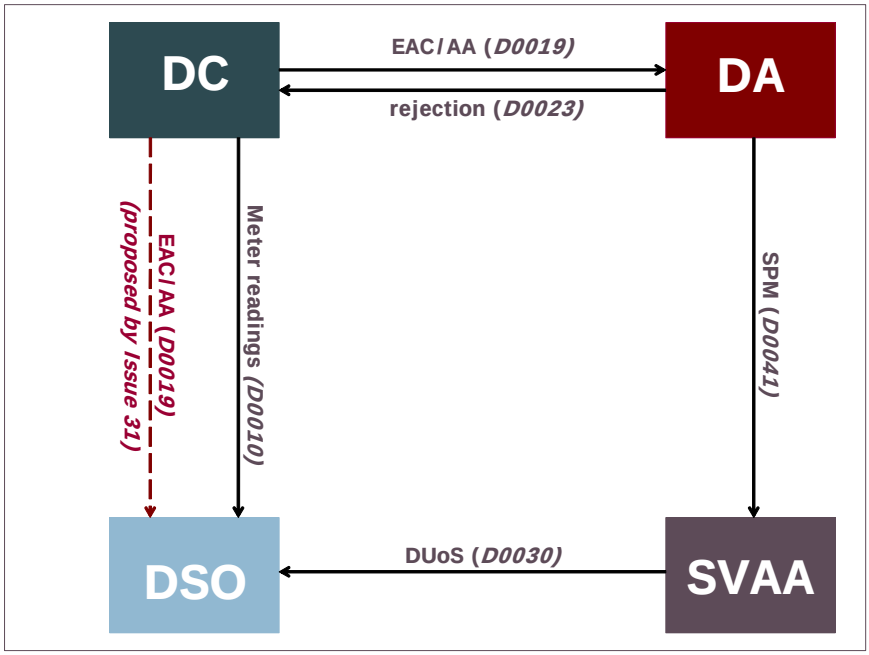
1.3 Issue 31 was raised in order to gauge the extent of industry support for another Modification Proposal being brought forward in this area. The solution proposed by Issue 31 is identical to that considered under P43, and would involve the provision of EAC and AA data by NHHDCs to DSOs via the D0019 – to be used by DSOs as a proxy for Non Half Hourly (NHH) site-specific consumption data.

1.4 Figure 1 on the following page gives an overview of the existing NHH data flows which are relevant to consideration of Issue 31. Further information regarding these flows can be found in Section 2 below.

[1] A copy of the Issue as submitted by the Proposer can be found on the BSC Website at: http://www.elexon.co.uk/changeimplementation/ModificationProcess/groups/issues/default.aspx.

[2] Modification Proposal P43 'Provision of Annualised Advance and Estimated Annual Consumption Data' (P43). Copies of all documentation relating to P43 can be found on the BSC Website at: http://www.elexon.co.uk/changeimplementation/ModificationProcess/modificationdocumentation/modProposalView.aspx?propID=48.

Figure 1 – relevant NHH data flows



2 Discussion of Issue

Problem identified by Issue 31

2.1 The Group sought clarification from the Proposer regarding the nature of the problem raised by Issue 31. The Proposer advised that, as an Independent Distribution System Operator (IDSO),[3] their Distribution System is connected to that of another host DSO. It is therefore necessary for both the IDSO and the host DSO to obtain information regarding how much energy is transported across the boundary between their Distribution Systems for the purposes of system planning. In addition, IDSOs need to understand demands on their connections on a site-by-site basis for network planning and operation reasons. Over-engineering a system can result in inefficient design/operation and additional costs, whilst under-engineering can reduce the resilience of distribution networks and increase the risk of disturbance to end consumers.

2.2 The Proposer considered that electricity consumption provides a useful proxy for demand for such purposes. Although DSOs receive copies of Meter readings via the D0010 'Meter Readings' flow, the D0010 data may be two years out of date and has to be cleansed for it to have value. Although DSOs can request Suppliers to provide information on an ad-hoc basis, by its very nature handling these specific requests is likely to be expensive. The solution proposed by Issue 31 is therefore that DSOs should receive EAC/AA data via the D0019, such that they would be able to use this as a proxy for site-specific consumption.

[3] Note that the Balancing and Settlement Code (BSC) does not contain a distinction between a DSO and an IDSO. However, the term IDSO is used within this paper for ease of understanding since this term is widely recognised within the industry.

2.3 Some members of the Group queried whether the proposed EAC/AA data was required for Distribution Use of System (DUoS) billing purposes. The Proposer advised that Suppliers are billed by DSOs for Non Half Hourly (NHH) consumption on the basis of the aggregated GSP Group consumption data contained in the D0030 'Non Half Hourly DUoS Report' flow, which is already provided to IDSOs and DSOs. The Proposer confirmed that the current method of billing Suppliers would continue even if DSOs received EAC/AA data, since the D0030 is fit for this purpose.

2.4 The Proposer advised that EAC/AA data was primarily sought to aid system management decisions by providing the site-by-site consumption details which are not available in the D0030. However, the Proposer noted that the arrangements for the billing of IDSOs by DSOs (which are contractually agreed) often require boundary metering to be provided by IDSOs. The Proposer suggested that it might be appropriate in the longer-term for IDSOs to be billed on the basis of the D0030 data which, when used in conjunction with the D0019, could remove the need for boundary metering in respect of smaller sites.

Issues with existing D0010 data

2.5 A member queried why the Meter readings received by DSOs via the D0010 were not sufficient for system management. The Proposer clarified that it can take 14 months to receive readings through the D0010 – for example, for new sites. In such circumstances, the D0019 would give DSOs a default value for the site (e.g. a class-average EAC). A DSO present at the Group advised that the D0010 could potentially be used to derive estimated AAs for Time Pattern Regimes (TPR) at domestic-site Metering System IDs (MSIDs), and the maximum demand of MSIDs for other types of sites. Indeed, the Group believed that a minority of DSOs currently use the D0010 for this purpose. However, the DSO concerned advised that, in order for their organisation to do this, they would need to employ validation on the D0010 data – since some of the values received often appear to be extremely inaccurate and therefore have to be discounted. The DSO commented that the resources required to undertake this validation would outweigh the benefit to it of using the D0010 data. The Proposer agreed and considered that this explained why a majority of DSOs did not currently use this data for system-management purposes. A majority of the Group agreed, and believed that D0019 EAC/AA values would therefore require substantially less processing (and thereby less resource) to use than the D0010 Meter readings.

2.6 A member expressed uncertainty as to whether the D0019 values would be more accurate than the D0010. It was noted that, if an error was present in the D0010, this would initially be processed into the D0019. However, this would subsequently be corrected if an error was identified during validation, since a revised D0019 would be issued. The Group did not believe that corrected D0010s were issued. The majority of the Group therefore believed that the D0019 data would be more accurate. ELEXON queried whether any DSOs or Suppliers currently compare the accuracy of the D0010 and D0019 values. Those DSOs present at the meeting clarified that it is not possible for them to do so at present, since they do not receive the D0019. One DSO commented that they often spotted potential anomalous values in the D0010, but did not have the resource to raise these as and when they noticed them (which was often some time after the event). The Suppliers present at the Group took an action to advise ELEXON of whether they currently compared the accuracy of D0010 Meter readings with D0019 EAC/AA data.

2.7 One Supplier subsequently confirmed that they did undertake some checking of D0019s against volumes in their billing systems. Whilst their billing system volumes would have been generated by D0010s, their own estimating algorithms would have been applied. In addition, the Supplier confirmed that they did carry out some spot checks designed to confirm whether D0010s had been used in D0019 calculations. The Supplier advised that they believed that the checks were used to generate exceptions, but that they did not currently have any clear evidence of what the checks revealed. The Supplier offered to investigate this further once a Modification Proposal was raised, and if the Modification Group considered this to be useful.

Uses of D0019 data

2.8 Some members requested clarification of how IDSOs would specifically use the D0019 EAC/AA data for system management. The Proposer advised that, like other IDSOs, they have three core database systems:

- A billing database;
- A registration database, which lists which MSIDs are registered to each Supplier; and
- An asset database, which maps MSIDs to sites (and which is used for certain reporting to Ofgem).

The D0019 contains EAC and AA values for each MSID. On receipt of this data, IDSOs would therefore be able to run a query in their databases to match these values to specific sites. Other DSOs present at the Group confirmed that they would also be able to undertake such mapping within their databases.

2.9 It was noted that EAC/AA data would not represent an exact replica of consumption. The Proposer recognised this, but clarified that all that was required was a crude proxy for site-specific peak demand in order to make system-management decisions (e.g. if demand in an area was close to exceeding system capacity, the DSO could identify that reinforcement works were required).

Scope of proposed solution

2.10 ELEXON queried whether the D0019 EAC/AA data would be of benefit to all DSOs, or only to IDSOs. The Proposer clarified that their intention was that the D0019 data would be provided to all DSOs, since they believed that it would have value for both host DSOs and IDSOs in undertaking system planning. There was support for this view from other members. This was considered further by the Group in its more detailed discussions of the proposed solution (see Section 3 below).

2.11 It was noted that, due to the need to establish how much energy is transported across the boundary between the IDSO's and host DSO's network, most host DSOs currently place a contractual obligation on IDSOs to provide boundary metering. ELEXON therefore queried whether the solution proposed by Issue 31 was intended to remove the need for such metering. The Proposer advised that they viewed the provision of D0019 EAC/AA data as one step towards the potential future removal of this requirement. However, they clarified that they considered this issue to lie outside the BSC as a contractual arrangement between host DSOs and IDSOs. Therefore, it would not form part of any Modification Proposal which they might raise from Issue 31. The potential interaction between the proposed solution and the provision of boundary metering was discussed further by the Group during its consideration of the overall potential benefits of the proposed solution (see Section 4 below).

2.12 A member noted that the identified issue and proposed solution related to the NHH market, and questioned what data was required by DSOs for Half Hourly (HH) consumption. The Proposer clarified that DSOs already receive sufficient HH consumption data for both billing and system-management purposes, since they receive HH flows on a MSID basis (e.g. through the D0036 'Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' flow).

Change in market environment since P43

2.13 A member queried what had changed since the consideration of P43, noting the lack of support for progressing a D0019 solution at that time. The Proposer clarified that, at the time when this proposal had previously been discussed in 2001, Western Power Distribution (the proposer of P43) had been the only DSO whose distribution business had been fully independent from its supply activities. As a result, the other DSOs present in the market at that time continued to have access to site-specific consumption figures through Supplier billing systems and therefore had less direct need of the D0019 data. However, since the rejection of P43, all DSOs had been subsequently separated from supply businesses – making the provision of such data more vital to their ongoing ability to manage their Distribution Systems. The original proposer of P43, who was present at the Issue 31 meeting, agreed with this view.

3 Discussion of Potential Solutions

3.1 The Group considered five potential solutions as follows:

1) NHHDCs to provide DSOs with D0019s for only those MSIDs registered to their own network;

2) NHHDCs to provide DSOs with D0019s for all MSIDs in their GSP Group(s);

3) NHHDAs to provide DSOs with post-validation D0019s (a potential variation on solutions 1 or 2 above);

4) DSOs to receive additional profiling data in addition to the D0019 (a potential addition to solutions 1 or 2 above); and

5) DSOs to be provided with equivalent data to the D0019 by Suppliers under the Distribution Connection and Use of System Agreement (DCUSA) and outside the BSC.

Further information each of these potential solutions is provided below.

Potential BSC solutions

<u>Proposer's original proposed solution – D0019 for MSIDs registered to own network only</u>

3.2 The Group considered the suggestion of the Proposer that EAC/AA data should be provided by NHHDCs to all DSOs. ELEXON queried whether each DSO would receive all D0019 files, or only a subset of these (e.g. those for the entire GSP Group(s) in which their Distribution System lay, or those which related to only those MSIDs which were registered within their own distribution network). The Proposer clarified that their intention was for DSOs to only receive D0019 data in relation to their own MSIDs, and believed that provision of such data for other MSIDs might give rise to confidentiality issues.

3.3 A member noted that this would require the NHHDC, in sending the D0019, to identify which files to send to which DSOs. The Proposer commented that the NHHDC would be able to do this using the MSID, in the same way as currently happens with the D0010 and D0030 flows. The member accepted this, but considered that this was likely to require more significant system and/or process changes for NHHDCs than if they had been required to simply send all DSOs an exact copy of the D0019 files sent to Suppliers and NHHDAs – since a single D0019 file may currently contain data relating to a number of DSOs. However, another member believed that the proposed solution would be a relatively simple change.

Alternative BSC solution (1) – D0019 for all MSIDs in GSP Group

3.4 A member noted that, if DSOs were only to receive the D0019 for the MSIDs registered to their own distribution network, this would mean that host DSOs would not receive the data for any IDSO MSIDs within their network. The Group noted that this was the case. The Proposer commented that there might be confidentially issues if the host DSO received data for MSIDs registered to an IDSO. However, the Proposer clarified that they envisaged that IDSOs would separately forward to their host DSOs the aggregated site-specific consumption figures which they would derive from the D0019 data (assuming that there proved to be no confidentiality issues with providing this aggregated data).

3.5 It was suggested that, in order to ensure that the data was being interpreted correctly, DSOs would need to agree a common method for using the D0019 data once it had been made available. ELEXON queried whether this requirement would form part of any Modification Proposal arising from Issue 31. The Proposer clarified that they believed this to be a secondary step, to be agreed between host DSOs and IDSOs outside the BSC (and potentially under the DCUSA) once the D0019 data had been made available.

3.6 A member noted this clarification, and agreed with the suggestion that IDSOs should forward the site-specific consumption totals to their host DSO. However, this member believed that it would be preferable for DSOs to receive D0019s for all MSIDs in their GSP Group(s), whether or not they were the distributor for these MSIDs. The member commented that this would provide host DSOs with an independent total for comparison with the site-specific figures provided by the IDSOs, since host DSOs could use the Electricity Central Online Enquiry Service (ECOES) to determine which IDSO MSIDs were in their network.

3.7 The Group noted that this would involve a slightly different solution, requiring two different processes by the NHHDC: one to send IDSOs the D0019s for their own MSIDs only, and one to send host DSOs the D0019s for all MSIDs in their GSP Group(s). ELEXON also noted that this could require NHHDCs to distinguish between host DSOs and IDSOs, and that the BSC does not currently contain such a distinction. The member confirmed that they were happy for DSOs to receive the D0019 for their own MSIDs only as a first step, and would not want the progression of this to be compromised by any additional cost and/or complexity which might be introduced by their additional desire for host DSOs to receive data for all MSIDs.[4] On balance, this member therefore concluded that this additional requirement would be best progressed as a separate change to any Modification Proposal arising from Issue 31.

3.8 The Group agreed with this approach, considering that the member's suggestion appeared to deal with a separate issue to that originally identified by the Proposer since it did not relate to system management.

[4] It was suggested that such a requirement could become particularly complex in the case of 'nested' networks involving multiple DSOs.

Alternative BSC solution (2) – post-validation D0019

3.9 ELEXON noted that the D0019 flows sent by NHHDCs to Suppliers and NHHDAs were pre-validation, and could be rejected by NHHDAs via the D0023 'Failed Instructions' flow – resulting in the sending of further D0019s. The Proposer noted that this was the case, but considered that pre-validation values would be sufficient for system-management and non-billing purposes – noting that DSO systems could be designed to deal with this situation by overwriting previous values with the latest ones received.

3.10 The Proposer noted that the validated data sent by the NHHDA to the Supplier Volume Allocation Agent via the D0041 'Supplier Purchase Matrix Data File' flow would be aggregated, and would therefore not provide the site-specific detail needed. The Proposer considered that the alternative – of introducing a separate new post-validation flow from NHHDAs to DSOs – would be more accurate, but was likely to be more expensive than utilising the existing D0019.

Alternative BSC solution (3) – D0019 with additional profiling data

3.11 ELEXON noted that EAC/AA data would not give an exact replica of consumption, and noted that greater accuracy could be achieved by applying profiling coefficient data. It was noted that this would require DSOs to additionally receive profile coefficients through the D0018 'Daily Profile Data Report' flow. The Proposer expressed concern that this could add additional complexity and/or cost to the solution, making it less likely to be supported by the industry. In addition, the Proposer believed that unprofiled EAC/AA data would be sufficient for system-management purposes – since over time it would provide a crude sanity-check for the D0030, with DSOs able to use class-specific load factors to work out a rough approximation of peak demand.

3.12 It was noted that using a load factor would not capture if a Meter was only recording for part of a year. However, the Proposer considered that using unprofiled EAC/AA data and load factors would allow DSOs to check whether their network was over or under reinforced, whilst if an AA value was received outside the expected boundaries this would act as a prompt for the DSO to investigate whether there might be a potential metering fault or a significant change at the site. The Proposer clarified that they also wished to keep the data received by DSOs to a manageable size so that a simple solution could be easily applied to the data (e.g. using Microsoft Access).

3.13 ELEXON advised that there is an issue with the accuracy of AAs as a measure of a customer's annual consumption. This is caused by the fact that the profile coefficients do not sum to 1 over a year. This is due to several reasons, but largely results from the fact that the Average Fraction of Yearly Consumption (AFYC) values that are used to normalise each register (i.e. to make the profile coefficients sum to 1 across a register) are representative of the tariff-register split rather than the area under the coefficients. This error is self-correcting when a meter advance is settled since the D0041 data is multiplied by the half-hourly coeffecients. It was therefore queried whether using unprofiled AA values might give an inaccurate picture of consumption, and whether DSOs would therefore also need to receive the D0039 'Daily Profile Coefficient File' flow (currently sent by the Supplier Volume Allocation Agent (SVAA) to NHHDCs) in order to apply daily profile coefficients to AA data. Alternatively, it was suggested that yearly profile coefficient data could be provided (via the D0018 or D0039), or that the sum of the coefficients for each Time Pattern Register (Profile Class, Grid Supply Point, Standard Settlement Configuration combinations) could be published on an annual basis.

3.14 ELEXON subsequently provided a worked example containing real customer data and some profiling data to the Group. In this example, multiplying the AA by the sum of the Daily Profile Coefficients overestimated the number of units of consumption. This was because the individual customer's consumption pattern did not follow that of the average customer. However, it was suggested that, if greater numbers of MSIDs were modelled (as would be the case for IDSO networks), the customer consumption pattern would tend towards that of the average customer – making multiplying by the sum of the Daily Profile Coefficients more advantageous.

3.15 On balance, however, the Group was uncertain of the benefit of adding this level of complexity (and additional resulting cost) to the solution, and whether this level of accuracy was needed for DSO's system-management purposes. The Proposer concluded that they were unlikely to include this aspect in any Modification Proposal they considered raising. However, it was noted that, if a Modification Proposal were to be brought forward, the additional sending of Daily Profile Coefficients to DSOs could still potentially be considered as an Alternative Modification to that proposal if appropriate – depending on how the description of the issue/defect was worded in the proposal form.

Potential DCUSA solutions

3.16 The Group noted that an alternative solution to the provision of EAC/AA data via the D0019 could be to introduce a requirement within the DCUSA for Suppliers to provide DSOs with equivalent data. It was noted that this solution would not necessarily require changes to any data flows or data catalogues, since Suppliers could provide the data manually (e.g. by emailing D0019s to DSOs). It was also noted that, in its P43 decision letter, the Authority had expressed the view that the provision of site-specific consumption data to DSOs best lay outside the BSC. It was therefore queried whether a DCUSA change might be more appropriate. However, the Proposer advised that a DCUSA change was not their preferred route, since they were unconvinced that it would be more cost-effective.

4 Conclusions

Preferred solution

4.1 On balance, the Group agreed that the original solution proposed by Issue 31 was the most preferable solution (i.e. the provision of EAC/AA data by NHHDCs to DSOs for their own MSIDs only, without any further profiling data).

4.2 A member of the Group queried whether a Modification Proposal was actually required to deliver the intended solution, or whether this could instead be progressed via a CP. The Group noted that P43 had sought to change Section S2.3.2 and Annex S-2 Section 4.3.1 of the Code – although, as legal text had not been produced for P43, it was uncertain exactly what the changes would have been. It was noted that Section S2.3.2(g) and Annex S-2 Section 4.3.1(h) require NHHDCs to send EAC/AA data to NHHDAs, and that it could be argued that these clauses would require modification to state that this data should also be sent to DSOs. However, a member noted that Section S2.3.2(i) and Annex S-2 Section 4.3.1(i) already states that NHHDCs shall provide 'SVA Metering System reports' to Suppliers and DSOs. This member suggested that this existing provision might be broad enough to allow NHHDCs to provide EAC/AA data to DSOs, since this data is provided at the MSID level and could therefore be argued to represent an 'SVA Metering System report'.

4.3 ELEXON agreed to seek legal advice in this area, and subsequently advised the Group that – since S2.3.2(i) and Annex S-2 4.3.1(i) are not explicitly clear on whether EAC/AA data can be provided to DSOs – it would suggest that a Modification Proposal was required.

4.4 The Group noted that, in addition to a change to the BSC itself, the solution would also require changes to:

- Balancing and Settlement Code Procedure (BSCP) 504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS';
- The SVA Data Catalogue;
- The Master Registration Agreement (MRA) Data Transfer Network (DTN); and
- The MRA Data Transfer Catalogue (DTC).

The Group noted that an MRA DTC Change Proposal (CP) would therefore also be required in order to progress the consequential changes to the DTN/DTC.

4.5 The Group noted that the implementation costs of making the changes to the DTC, DTN and NHHDC systems and processes had not been specified in the P43 report. The Group agreed that a key part of progressing any Modification Proposal in this area would be to establish these costs, to help the industry consider whether the change would better facilitate the achievement of the Applicable BSC Objectives.

Group's views of potential benefits

4.6 The Group noted that a key factor in the rejection of P43 had been that the P43 Modification Group, the Panel and the Authority had believed it to be unclear whether the proposal would better facilitate the achievement of the Applicable BSC Objectives – since it would not necessarily lead to lower distribution costs or lower DUoS charges. The Group agreed that it would therefore be useful for it to give initial consideration of the merits of the proposed solution against the Applicable BSC Objectives, to see if potential benefits against these Objectives could be identified.

4.7 The Group agreed that the solution would have no effect on the Transmission System, and therefore no effect on Applicable BSC Objectives (a) and (b).[5] The Group was generally neutral on Objective (d),[6] since it noted that the proposed data would not be used in Settlement. The Group therefore agreed that the key question would be whether the solution would better promote competition in the generation and supply, or the sale and purchase, or electricity – and thus whether it would better facilitate the achievement of Applicable BSC Objective (c).[7]

[5] Applicable BSC Objectives (a) 'The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence' and (b) 'The efficient, economic and co-ordinated operation of the GB Transmission System'.

[6] Applicable BSC Objective (d) 'Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'.

[7] Applicable BSC Objective (c) 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity'.

4.8 A majority of the Group believed that the original solution proposed by Issue 31 would better facilitate system planning by DSOs, noting that the capacity of distribution networks is becoming increasingly tighter. These members considered that the provision of EAC/AA data to DSOs via the D0019 would enable better understanding and planning of capacity by DSOs, more efficient use of DSO resources, and thereby ultimately more efficient use of Distribution Systems. It was noted that Applicable BSC Objective (c) does not refer to competition in distribution. However, some members considered that, if the level of distributed generation were to significantly increase in the future, then the provision of pertinent data to DSOs would become increasingly important in helping to promote competition in generation. One member also believed that (whilst the EAC/AA would not be used directly for billing) the proposed change could facilitate more accurate tariff-modelling by DSOs for IDSOs and distributed generation in the future.

4.9 The Proposer suggested that receiving EAC/AA data would help DSOs to identify issues where there were discrepancies between the D0010 and D0019, and that (depending on the cause of these discrepancies) this could ultimately provide health and safety benefits. Another member considered that, whilst they believed there would be benefits to DSOs, they believed it was difficult to provide detailed information regarding these benefits until the data was made available. However, all of these members were comfortable that, on the basis of the above arguments, a potential case in favour of the change could be made in respect of Applicable BSC Objective (c) – although this would ultimately be subject to identification of the implementation costs. These members therefore supported a Modification Proposal being raised to give further consideration to the impacts and costs of the proposed solution.

4.10 It was queried whether the proposed solution would lead to the removal of boundary metering, and whether this might also be a potential benefit to competition. Some members considered that the existing requirement by host DSOs for IDSOs to provide boundary metering (and to bear the related costs) could be seen as a barrier to competition in distribution. The Group noted that the provision of EAC/AA data to DSOs would not in itself remove boundary metering, and that this could therefore not be considered to be a primary benefit of the solution. However, some members considered enabling DSOs to better understand both total IDSO and site-by-site consumption through the use of EAC/AA data might mean that, in the future, there was less of a requirement for such metering in relation to smaller sites. One member commented that if IDSOs currently incurred significant boundary metering costs, these might be reflected in their tariffs for Suppliers – and that there could therefore also be potential benefits to competition in the supply, sale and purchase of electricity if the requirement for such metering was reduced.

4.11 A minority of members remained unconvinced that the solution proposed by Issue 31 would better facilitate the achievement of the Applicable BSC Objectives, since they noted that the costs of the required changes to NHHDC systems and processes would ultimately be incurred by Suppliers. One of these members stated that Suppliers would receive no benefit from this expenditure. Another member commented that their view continued to be that the provision of consumption data should be commercially arranged between DSOs and Suppliers outside of the BSC. There members therefore did not support a Modification Proposal being raised. However, the Proposer noted that, if the provision of EAC/AA data to DSOs was progressed under the DCUSA rather than the BSC, Suppliers might still be responsible for bearing the costs of providing this data in accordance with existing Clause 29 of the DCUSA (which obliges Suppliers to meet the costs of certain data provision to DSOs).

Way forward

4.12 The Group noted that it was ultimately a decision for the Proposer (or any other Party) whether they wished to raise a Modification Proposal in this area. The Proposer commented that, following the Group's discussions, they remained persuaded that a Modification Proposal should be raised – and would therefore be seeking to take this forward.

4.13 The Group noted that, should a Modification Proposal be raised, more detailed industry views on the merits of the change would be sought through consultation as part of the Modification Procedures.

4.14 Following the Group's meeting, Modification Proposal P222 'Provision of EAC and AA data to Distributors' has subsequently been raised by the Proposer of Issue 31. An Initial Written Assessment for P222 will be presented to the Panel at its meeting on 14 February 2008.

5 Recommendations

5.1 The Panel is invited to:

a) **NOTE** the conclusions of the Issue 31 Group;

b) **NOTE** that a majority of Group members supported a Modification Proposal being raised to further consider the provision of EAC/AA data to DSOs via the D0019;

c) **NOTE** that Modification Proposal P222 has subsequently been raised by the Proposer of Issue 31; and

d) **NOTE** that, following the submission of this report, Issue 31 will be closed.

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List of appendices

Appendix 1: Issue 31 Group membership

List of attachments

None.

Appendix 1: Issue 31 Group membership

Member	Organisation	14/01
Sarah Jones	ELEXON (chair)	Y
Kathryn Coffin	ELEXON (lead analyst)	Y
Kevin Spencer	ELEXON (technical support)	Y
Mike Harding	Electricity Network Company (Proposer)	Y
Glenda Simons	Electricity Network Company	Y
Graham Smith	Western Power Distribution	Y
Martin Brandt	SSE	Y
Jane Griffith	Central Networks	Y
Peter Collinson	CE Electric	Y
James Nixon	SAIC	Y
Andrew Manning	Npower	Y
Howard Gregory	Npower	Y
Gareth Jones	IPNL	Y
Rachel O'Keefe	Cornwall Energy Associates	Y
Simon Polley	Ofgem	Y