Assessment Consultation

CP1408

About this document:

This is an Assessment Consultation document, which provides details of the background, solution, potential impacts and costs associated with CP1408 'Excessively Large EAC/AA Control Points'. This document is for information only, to be used in line with the Consultation Response form, to which this document is attached.

1. Why Change?

Background

At its October 2013 meeting, the Supplier Volume Allocation Group (SVG) (SVG152/02) highlighted the risk of extremely large Estimation of Annual Consumption/ Annualised Advances (EAC/AAs) entering Settlement that are far beyond plausible levels of genuine consumption for a single Non-Half Hourly (NHH) Meter.

Two recent instances of erroneously large EAC/AA values (of >1TWh) highlighted that Suppliers and their agents can, on rare occasions, fail to correct these extremely large values before they reach NHH Data Aggregators (NHHDAs). Centrally-supported Supplier Agent software and industry data flows were not designed to preclude a Supplier from entering such values. ELEXON therefore raised concerns that an excessive value could be used in central Settlement calculations.

What is the issue?

ELEXON identified three additional controls[1] that warranted further investigation and at its February 2014 meeting, provided the SVG (SVG156/03) with the results of the central service provider costs associated with two of three options[2]. Taking these costs and the Software Technical Advisory Group (STAG)'s comments on the viability of the options into account, the SVG agreed to progress the first option in isolation since it would prevent all extremely large erroneous values entering Settlement.

ELEXON raised CP1408 'Excessively Large EAC/AA Control Points' on 14 February 2014 to address this issue.

[1] The three additional controls were as follows:

- Option 1: Change the NHHDA system to reject any EAC/AA that exceeds a certain consumption threshold and to generate a Failed Instruction (D0023) flow. This change would involve adding an Instruction Failure Reason Code to the valid set for the J-Item;
- Option 2: Change the EAC/AA calculator to reject any calculated EAC/AA that exceeds a certain consumption threshold; and
- Option 3: Change the J-Items for AAs and EACs, to limit the number of digits it is possible to enter in either field on any industry flows that include them.

[2] Options 1 and 2 had comparatively modest central costs which could be implemented by ELEXON and its service providers. Option 3, however, was viewed as a major change with the potential for high associated costs for BSC Parties and Party Agents (a number of high-volume flows would need to be amended and an MRA Solution Pre- Assessment Form would also need to be raised to impact-assess this option).

2. Solution

CP1408 will change the NHHDA System to reject any EAC/AA that exceeds a certain consumption threshold entering Settlement. This will be based on existing J-item J1361 'Instruction Failure Resolution Code' which is part of D0023 'Failed Instructions[3]'. ELEXON believe that Instruction Failure Reason Code 'NIV' – 'EAC/AA value outside range permitted by NHHDA software', would be appropriate. This is because it is both an accurate description of the reason for rejection, and a reason code that is not used in high volumes, meaning that consequent changes to NHH Data Collector (NHHDC) scripting should be minimised.

The system change will need to be reflected in the NHHDA User Requirements Specification and supporting changes made to BSC Procedure (BSCP) 505 'Non-Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS', for NHHDAs.

While these values are an unusual event, they are inherently high materiality, impacting all BSC Parties through GSP Group Correction and Credit Cover provisions. ELEXON believes the NHHDA System to be the best place for any control point to be created, on the basis that it is relatively cost effective; closes off the risk of excessively large values in Settlement; and minimises consequent changes required to agent and Supplier systems (when compared to the other two options discussed with the SVG).

Question 1
Do you agree with the proposed change?

3. Impacts and Costs

Potential Central Impacts and Costs

The impacted documents and systems for CP1408 are set out below:

Potential Impacts	
Document Impacts	**System Impacts**
BSCP505 NHHDA User Requirement Specification	NHHDA software

The estimated ELEXON effort and Demand Led system change costs to implement CP1408 are set out in the table below:

[3] http://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0023&FlowVers=1&searchMockFlows=False

ELEXON Costs		
ELEXON effort	**Demand Led System Changes**	**Total**
5 man days equating to £1200.	Approximately £3,500 if completed as a standalone release (N.B. the cost may be less if implemented alongside other similar changes).	**Approximately £4,700**

Potential participant impacts and costs

We anticipate that there may be minor participant impacts associated with CP1408 in that NHHDAs will have to deploy a newer version of the NHHDA software.

Question 2
Is your organisation impacted? If yes, please answer the following:

Question 2a
How is your organisation impacted?

Question 2b
What are the associated costs on your organisation to implement this change?

4. Implementation Approach

CP1408 is targeted for implementation on 6 November 2014 as part of the November 2014 BSC Systems Release.

Question 3
Do you agree with the implementation approach? If not, why?

5. SVG Initial Views

As detailed in section 1, ELEXON presented a paper for this proposed new change to the SVG (SVG156/03) at its February 2014 meeting.

An SVG Member questioned whether a similar change had been looked into on the Half Hourly (HH) side and whether there would be a benefit for doing this. ELEXON noted that EACs are by their nature used more in the NHH market and that there had been no instances of extremely erroneous HH EAC/AAs. ELEXON noted that any HH change would impact different flows and so would be best progressed as a separate CP. However, the SVG asked ELEXON to include a question as part of the CP Impact Assessment as to whether

there would be benefit in a similar HH change. As such, questions 4 and 5 below have been included in addition to the standard consultation questions.

Question 4
Do you believe there would be a benefit if similar controls were imposed on HH market? If so, please provide rationale.

Question 5
How feasible do you believe similar changes to HHDA systems would be?

Question 6
Do you have any other comments?

Attachments:

Attachment A – CP1408 - Form
Attachment B – BSCP505 Redlining v0.1
Attachment C – NHHDA URS Redlining v0.1

For more information, please contact:

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