

CP1432 'HH Default EAC by Measurement Class'



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About This Document

This document is the Final Change Proposal (CP) Report for CP1432, which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1432.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and implementation approach. It also summarises the SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1432 solution.
- Attachment B contains the full responses received to the CP Consultation.

1 Why Change?

What is the HH Default EAC?

The Half Hourly (HH) Default Estimated Annual Consumption (EAC) is defined in Market Domain Data (MDD). ELEXON provides this to Half Hourly Data Collectors (HHDCs) and Half Hourly Data Aggregators (HHDA) as part of the MDD publication. HHDCs use the HH Default EAC in the 'last resort' estimation method, as described by Balancing and Settlement Code Procedure ([BSCP](#)) 502 'Half Hourly Data Collection for SVA Metering Systems in SMRS' Section 4.2.1(h), and HHDA use the HH Default EAC when no data has been received from the expected HHDC.

The Panel, delegated to the SVG, reviews the HH Default EAC from time to time. It is based on the average annual consumption across all metered HH Metering Systems, irrespective of Measurement Class.



What is the 100kW requirement?

Metering Systems where the average of the maximum demands for three months in the last year exceeds 100kW are required to be settled HH. Suppliers can elect to settle Metering Systems HH if below this threshold.

What is the issue?

The implementation of [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) will result in an increase in the number of Metering Systems being HH settled that do not meet the 100kW requirements. As a result, the HH Default EAC that covers all HH Metering Systems will be too high for these. ELEXON had previously notified the SVG of its intention to raise a CP to address this issue.

2 Solution

Approved solution

[CP1432 'HH Default EAC by Measurement Class'](#) will create Measurement Class specific HH Default EACs by adding a new column to indicate the Measurement Class for the HH Default EAC to MDD Entity 59. As such, there will be a HH Default EAC for the HH Measurement Classes C, E, F, and G ([P300 'Introduction of new Measurement Classes to support Half Hourly DCUSA Tariff Changes \(DCP179\)'](#) will introduce Measurement Classes F and G). Measurement Class D is for HH Unmetered Supply and does not use the HH Default EACs, and Measurement Classes A and B are Non Half Hourly (NHH) so are not relevant to HH Default EACs.

Proposer's rationale

CP1432 will ensure that the HH Default EAC is appropriate to the type of Metering System so that the balancing and Settlement arrangements are efficient.

Approved redlining

Attachment A contain the approved redlining to deliver CP1432.

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Final CP Report

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1432 will impact BSCP502, [BSCP503 'Half Hourly data Aggregation'](#), [BSCP509 Appendix 1 'MDD Entity Change Request Forms'](#) and the [SVA Data Catalogue](#). The HH Default EAC is distributed via the P0186 'HH Default EAC' flow independently of the [D0269 'Market Domain Data Complete Set'](#) and [D0270 'Market Domain Data Incremental Set'](#) data flows. Therefore, there will be no impact on the BSC Systems such as the MDD database and the Supplier Volume Allocation Agent (SVAA) system.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP502• BSCP503• BSCP509 Appendix 1• SVA Data Catalogue (parts 1 and 2)	<ul style="list-style-type: none">• <i>None</i>

Central costs

The central implementation costs for CP1432 will be approximately £240 (one ELEXON man day) to implement the necessary document changes.

In conjunction with this CP, ELEXON will carry out analysis to establish initial HH Default EAC values for the new Measurement Classes and revisit the existing value to be used for Measurement Class C. We will present these to the SVG for decision and implementation via the MDD change process.

BSC Party & Party Agent impacts and costs

Participant impacts

The change will impact HHDA and HHDCs, who will need to make system changes as well as update procedures. There will be minor impacts on Suppliers and Distribution System Operators (DSOs) as they receive the P0186 'HH default EAC' flow.

Participant Impacts	
Participant	Impact
DSO	As recipients the of P0186 'HH default EAC' flow, these participants may require changes to how these are processed internally.
Supplier	
HHDA	Process changes are likely, and system changes may potentially be required to apply the Measurement Class specific HH default EACs, as required.
HHDC	

One DSO respondent incorrectly identified system changes, as it believed that the D0269 and D0270 data flows would be amended. ELEXON has advised the respondent that this is not the case.

Participant costs

Participants did not provide specific costs. However, indications are that the system changes are likely to be small, although one Supplier Agent indicated medium to high costs.

4 Implementation Approach

Approved Implementation Date

The approved Implementation Date for CP1432 is **5 November 2015** as part of the November 2015 Release.

This aligns with the P300 Implementation Date, from when the migration to HH under P272 is likely to pick up and when Measurement Classes F and G will be available. All respondents agreed with this approach, with some noting the necessity of aligning with the implementation of P300.

5 Initial Committee Views

SVG's initial views

ELEXON presented CP1432 to the SVG on 3 March 2015 ([SVG169/06](#)).

The SVG had no comments on CP1432.

6 Industry Views

This section summarises the responses received to the CP Consultation. The full consultation responses can be found in Attachment B.

Summary of CP1432 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1432 proposed solution?	9	0	0	1
Do you agree that the draft redlining delivers the intent of CP1432?	10	0	0	0
Will CP1432 impact your organisation?	8	2	0	0
Will your organisation incur any costs in implementing CP1432?	7	2	1	0
Do you agree with the proposed implementation approach for CP1432?	10	0	0	0
Do you have any further comments on CP1432?	4	6	0	0

Comments on the CP

Proposed HH default values

Whilst supportive of the principle, one respondent was concerned that the proposed values for Measurement Classes E, F and G do not deter the use of a default EAC and are therefore moving away from the original intention of default EACs. They commented that although there is no direct link between Profile Class and Measurement Class, they believe that the proposed values at Measurement Class level are lower than all the current average values at Profile Class level. They assert that the intention of the default EAC is to be punitive to encourage Suppliers and Supplier Agents take steps to avoid its use in Settlement.

In response, ELEXON pointed out that no values have yet been put forward and those in the redlined text are illustrative examples. However, we have updated the redlined text with the latest values for Measurement Class C and added in revised examples for the new Measurement Classes, though these will not necessarily be the values put forward. ELEXON will not update the examples every time these change, including when the SVG approves the first set of values for the new Measurement Classes, as this would require a Housekeeping CP and the examples are for illustrative purposes.

ELEXON disagrees with the points made on the purpose of the Default EAC. The HH Default EAC is calculated as annual energy divided by the average number of HH Metering Systems during the same year. Therefore, it is a representative value, designed as a reasonable proxy for actual HH data. We do not believe that it was ever intended to be punitive. If the SVG approved a punitive default EAC, then this would effectively mean potential overcharging of customers if Suppliers pass this on. The purpose of the Default EAC is to make sure Settlement is as accurate as possible.

Another respondent asked whether ELEXON's analysis has considered whether there is a material difference geographically that would necessitate Grid Supply Point (GSP) Group

specific HH Default EACs similar to the NHH market. We could consider this as a future improvement. There are currently no Metering Systems in Measurement Classes F and G on which to base a GSP Group level analysis. There are regional variances in average HH consumption in Measurement Classes C and E. It is unlikely that these will be material given that the anticipated numbers of Metering Systems on HH Default EACs is low. HHDCs and HHDA should only use HH Default EACs in exceptional circumstances and replace them with actual data or better estimates whenever possible.

Potential issues around the HHDC's awareness of Measurement Class ID

A respondent highlighted that one would need to know what the Measurement Class is in order to assign a default EAC value. They noted that the Supplier communicates the Measurement Class ID to the HHDC via the D0289 'Notification of MC/EAC/PC' data flow, which isn't always received in a timely manner (with HHDA's informed by the Supplier Meter Registration Agents (SMRAs) via the D0209 'Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator' data flow). Therefore, they asked how HHDCs would know which Default EAC to apply. They also asked for clarification as to whether it is via the HHDC or the HHDA that this will be known. ELEXON agrees that the Supplier notifies the HHDC of the Measurement Class using a D0289 data flow, and the SMRA notifies the HHDA of the Measurement Class using a D0209 data flow. We note that Measurement Class ID is not a mandatory field. The HHDC uses the HH default EAC for estimation method (h) 'No EAC or Profile Class Id available'. The HHDA uses the HH default EAC when it receives no actual or estimated data from the HHDC.

Comments on the proposed redlining

All respondents were supportive of the proposed changes, with some non-material changes identified. These are set out below and ELEXON has amended BSCP509 Appendix 1 accordingly.

Comments on the CP1432 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP509 Appendix 1, MC C	The default EAC effective from date 01/04/2000 is set at 750000.00, the default EAC effective from 02/04/2000 is set at 750001.0. From the latest MDD P0186001 the value is 1500 MWH.	The example is illustrative only. However, we have updated the example so as not to cause confusion. As the HH Defaults for the other Measurement Classes have yet to be approved, the examples provided are solely illustrative but will be updated nonetheless with values that may be more reflective.
BSCP509 Appendix 1, MC C	Entity 59 table there are two rows for Measurement Class C, with different HH default EACs and both with Effective Start Dates and no Effective End Dates on either.	Amend entry to be more realistic.

SVG's final views

ELEXON presented CP1432 to the SVG at its meeting ([SVG171/03](#)). The SVG had no comments on the CP.

Approval of HH Default EAC values

ELEXON will bring the proposed HH Default EAC values to the SVG for approval in summer 2015. This would ensure that the values are included in the October MDD Release, with an Effective From Date in Settlement of 5 November 2015 to align with the P300 Implementation Date.

The SVG requested that the HH Default EAC values be published on the BSC Website and/or as part of the MDD Online on the ELEXON Portal. ELEXON agreed to investigate publishing them on the main BSC Website or ELEXON Portal, and to confirm when it brings the values for the SVG's approval.

Final decision

The SVG has **APPROVED** CP1432 for implementation on **5 November 2015** as part of the November 2015 BSC Systems Release.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>Industry Code</i>)
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CP	Change Proposal
DSO	Distribution System Operator (<i>BSC Party</i>)
EAC	Estimated Annual Consumption
GSP	Grid Supply Point
HH	Half Hourly
HHDA	Half Hourly Data Aggregator (<i>Party Agent</i>)
HHDC	Half Hourly Data Collector (<i>Party Agent</i>)
MDD	Market Domain Data
NHH	Non Half Hourly
SMRA	Supplier Meter Registration Agent (<i>Party Agent</i>)
SMRS	Supplier Meter Registration Service
SVAA	Supplier Volume Allocation Agent (<i>BSC Agent</i>)
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)

DTC data flows and data items

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

DTC Data Flows and Data Items	
Number	Name
D0209	Instruction(s) to Non Half Hourly or Half Hourly Data Aggregator
D0269	Market Domain Data Complete Set
D0270	Market Domain Data Incremental Set
D0289	Notification of MC/EAC/PC
J0082	Measurement Class Id

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, 3	BSCPs page on the BSC Website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	P272 page on the BSC Website	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
2	CP1432 page on the BSC Website	https://www.elexon.co.uk/change-proposal/cp1432/
2	P300 page on the BSC Website	https://www.elexon.co.uk/mod-proposal/p300/
3	Business Definition Documents on the BSC Website	https://www.elexon.co.uk/bsc-related-documents/related-documents/business-definition-documents/
3	D0296 data flow in the Data Transfer Catalogue	http://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0269&FlowVers=4&searchMockFlows=False
3	D0270 data flow in the Data Transfer Catalogue	http://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0270&FlowVers=4&searchMockFlows=False
5	SVG169 page on the BSC Website	https://www.elexon.co.uk/meeting/svg-169/
8	SVG171 page on the BSC Website	https://www.elexon.co.uk/meeting/svg-171/