

CP Progression Paper

CP1463 'Process for ELEXON to calculate category 1 non-compliance materiality'

ELEXON



Committee

Imbalance Settlement
Group/Supplier Volume
Allocation Group



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About This Document

This document provides information on new Change Proposal (CP) 1463 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1463 Proposal Form.
- Attachment B and C contain the proposed redlined changes to deliver the CP1463 solution.

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1 Why Change?

Performance of materiality calculation of a category 1 non-compliance

During a site visit, the Technical Assurance Agent (TAA) might identify a category 1 non-compliance¹ and then perform an estimated materiality calculation of the impact on Settlement accuracy. At the end of each Audit Year, the TAA reports the number of non-compliances identified and the combined materiality in the TAA Annual Report. The TAA presents its Annual Report to the Performance Assurance Board (PAB) in May and to the Balancing and Settlement Code (BSC) Panel in June.

Following a request from the Technical Assurance of Metering Expert Group (TAMEG) in May 2015, ELEXON considered alternative methods for calculating the materiality of category 1 non-compliances that would provide a more accurate value than the current estimate. Whilst investigating an alternative method, ELEXON identified that, following the implementation of [CP1265 'Technical Assurance Documentation Changes Following Review'](#) in 2009, the current calculation had been removed from [BSC Procedure \(BSCP\) 27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes'](#). However, ELEXON did not update the Working Instruction used by the TAA, so the TAA continued to use the previous calculation.

ELEXON reported to the TAMEG that the calculation had been removed from BSCP27 and suggested an alternative calculation (the same as the existing calculation of the materiality of a Trading Dispute), which would be performed by ELEXON rather than the TAA. At its meeting in May 2015 ([TAMEG 22](#)), TAMEG requested that ELEXON present the proposed alternative method for calculating category 1 materiality to the PAB. At its meeting on 30 July 2015, the PAB considered the proposed method and analysis that demonstrated its accuracy compared to the original method ([PAB174/07](#)). It agreed that ELEXON's proposed method should provide a more accurate calculation of materiality of each category 1 non-compliance. This is because the proposed method uses metered data and the correct error period. The PAB recommended that ELEXON raise a CP to implement the proposed method.

Consequently, on 11 January 2016 ELEXON raised [CP1454 'Amendment to the category 1 materiality calculation'](#). The CP proposed that, in order to provide a more accurate materiality for each category 1 non-compliance, ELEXON performs a calculation in the same way that it calculates the materiality of a Trading Dispute. The ISG approved CP1454 at its meeting on 22 March 2016 ([ISG179/01](#)) and the SVG approved it at its meeting on 5 April 2016 ([SVG182/02](#)). CP1453 will be implemented on 30 June 2016 as part of the June 2016 Release.

What is the issue?

Respondents to the CP1454 CP Consultation and ISG Members considered that BSCP27 should contain more detail of the method that ELEXON will use to calculate materiality. This will support transparency of the arrangements and ensure that any future proposal to change the calculation is subject to BSC CP governance procedures (i.e. [BSCP40 'Change Management'](#)).

¹ 'A non-compliance has been identified which is deemed to be currently affecting the quality of data for Settlement purposes' (BSCP27, section 1.14).

Currently, there is an obligation within BSCP27 on the Central Data Collection Agent (CDCA) and Half Hourly Data Collectors (HHDCs) to provide complete and accurate Metering System data upon request to the TAA or ELEXON for the purposes of Technical Assurance. This includes a requirement for the HHDC to provide the current actual consumption data to the TAA within five Working Days from the receipt of the TAA's request. In addition, the TAA itself must submit within two Working Days of completing the Inspection Visit. However, BSCP27 does not include an explicit obligation on the CDCA and HHDCs (with associated timescales) to provide HH data for the entire period affected by the category 1 non-compliance. This should be done for the purposes of estimating the materiality of the net error.

ELEXON notes that although the method used for the category 1 non-compliance calculation will be the same as that used for Trading Disputes, the Trading Disputes process, as set out in [BSCP11 'Trading Disputes'](#), allows ELEXON to request HH data but only whilst a Trading Dispute is 'open'. That is data cannot be requested for any other purpose.

All Trading Disputes raised by ELEXON must be referred to the Trading Disputes Committee (TDC), as set out in BSC Section W 'Trading Disputes'. In order to make best use of the TDC's and ELEXON's time and resource, ELEXON endeavours to carry out a preliminary validation of each dispute prior to entering the Trading Disputes process. At its August 2015 meeting, the TDC noted an increased number of disputes raised by ELEXON, which did not meet one or more Trading Dispute validity criteria (materiality over £3,000, valid Dispute Deadline, existence of Settlement Error). ELEXON's analysis of category 1 non-compliances found by the TAA in 2015 that of 24 non-compliances, only four met the Trading Disputes' criteria and would therefore have enabled ELEXON to request HH data from the HHDC.

As such ELEXON may currently not be able to request HH data for a category 1 non-compliance calculation if the TAA category 1 non-compliance does not necessitate a Trading Dispute.

Proposed solution

ELEXON raised [CP1463 'Process for ELEXON to calculate category 1 non-compliance materiality'](#) on 9 May 2016. It proposes to amend BSCP27 in order to introduce a clear process for ELEXON to request data, and participants to provide data, and details of the method for ELEXON's calculation of the error materiality.

CP1463 builds on CP1454 by providing more detail of the calculation in BSCP27. In particular the change proposes to include the calculation method along with the timescales for carrying out the calculation in BSCP27.

In addition the proposed solution places an obligation on ELEXON to request HH consumption data for the period affected by the category 1 non-compliance, for the purposes of calculating the materiality of the identified error. It also places obligations on the HHDC and the CDCA to provide this data upon request. The change introduces timescales for ELEXON requesting the data and for the provision of the data by the CDCA and HHDCs.

Including a new obligation and the associated timescales to fill this gap within BSCP27 will be consistent with the current provisions set out in this document (where the TAA requests actual consumption data). It would also increase the effectiveness of the process whereby ELEXON receives the HH consumption data in time to complete the materiality calculations.

Attachment B contains details of all proposed changes to BSCP27.

Proposer's rationale

CP1454 CP Consultation respondents and ISG Members highlighted that there would be a benefit in adding the method for calculating the materiality of category 1 non-compliances into BSCP27. This would support transparency of the arrangements and ensure that any future proposal to change the method is subject to BSC CP governance procedures.

Proposed redlining

Attachments B and C contain the proposed changes to BSCP27 and the CDCA Service Description to deliver CP1463.

3 Impacts and Costs

Central impacts and costs

CP1463 will require changes to BSCP27. No system changes are required.

The central implementation costs for CP1463 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP27CDCA Service Description	<i>None</i>

We expect CP1463 to primarily impact ELEXON as it will be responsible for completing the calculation of materiality.

The CDCA Service Description will need to be updated to reflect the new requirements on the CDCA to provide HH consumption data for the period affected by the category 1 non-compliance.

We believe that minor changes to ELEXON's internal working processes will be required to implement the solution; however it will not require any additional resource from ELEXON to deliver. That is, ELEXON would raise a Trading Dispute for each category 1 non-compliance under normal BSC operations and would calculate the materiality as part of the Trading Dispute investigation.

The CDCA might also be required to provide HH consumption data for the period affected by the non-compliance. The CDCA has confirmed that, due to the small number of category 1 non-compliances on Central Volume Allocation (CVA) sites², this requirement would be absorbed into its existing BSC activities.

BSC Party & Party Agent impacts and costs

We expect CP1463 to impact the HHDC, which would need to provide HH data in a set timetable for the period affected by the category 1 non-compliance. We believe that minor process changes will be required to implement the solution.

We do not expect CP1463 to impact any other BSC Parties or Party Agents but we seek confirmation of this through this CP Consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHDC	Changes will be required to implement the solution

² In the last three years the TAA identified six category 1 non compliances on CVA sites (three in 2013 and three in 2015), two of which had been raised for the same site. Only two of them required a Trading Dispute.

4 Implementation Approach

Recommended Implementation Date

We propose to implement CP1463 on **3 November 2016** as part of the November 2016 Release.

The November 2016 Release is the next available Release that can include this CP.

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5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1463:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	21 Jun 16
CP Progression Paper presented to SVG for information	05 Jul 216
CP Consultation	11 Jul 16 – 05 Aug 16
CP Assessment Report presented to ISG for decision	23 Aug 16
CP Assessment Report presented to SVG for decision	06 Sept 16
Proposed Implementation Date	03 Nov 16 (Nov 16 Release)

CP Consultation questions

We intend to ask the standard CP Consultation questions for CP1463. We do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions
Do you agree with the CP1463 proposed solution?
Do you agree that the draft redlining delivers the CP1463 proposed solution?
Will CP1463 impact your organisation?
Will your organisation incur any costs in implementing CP1463?
Do you agree with the proposed implementation approach for CP1463?

6 Recommendations

We invite you to:

- **NOTE** that CP1463 has been raised;
- **NOTE** the proposed progression timetable for CP1463;
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation; and
- **NOTE** that we also presented CP1463 to the ISG for initial comment on 21 June 2016.

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>)
CDCA	Central Data Collection Agent (<i>BSC Agent</i>)
CP	Change Proposal
CPC	Change Proposal Circular
DC	Data Collector (<i>Party Agent</i>)
HH	Half Hourly
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
PAB	Performance Assurance Board (<i>Panel Committee</i>)
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
TAA	Technical Assurance Agent (<i>BSC Agent</i>)
TAMEG	Technical Assurance of Metering Expert Group
TDC	Trading Disputes Committee (<i>Panel Committee</i>)

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	CP1265 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1265-technical-assurance-documentation-changes-following-review/
2	BSCP27 page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	TAMEG22 page on the ELEXON website	https://www.elexon.co.uk/meeting/tameg-22-2/
2	PAB 174/07 page on the ELEXON webpage	https://www.elexon.co.uk/meeting/pab-174/
2	CP1454 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1454/
2	ISG 179 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-179/
2	SVG 182 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-182/

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External Links		
Page(s)	Description	URL
2	BSCP40 page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/1/?show=20&type
3	BSCP11 page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
4	CP1463 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1463/

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