

## CP1484 'Introduction of Additional SVAA Validation at SVA Run time'



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### About This Document

The purpose of this Change Proposal (CP) 1484 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1484. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1484.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes.
- Attachment A-D contains the proposed redlined changes to deliver the CP1484 solution.
- Attachment E contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.

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## Grid Supply Point

This is the Systems Connection Point at which the Transmission System is connected to a Distribution System.

## What is the current process?

A Supplier Volume Allocation (SVA) run allocates the quantities of Active Energy volumes to Supplier Balancing Mechanism Units (BM) Units. The SVA run involves aggregation across Data Aggregator (DA) files and profiling of non-half hourly volumes. The BM Unit data is then used in Settlement to determine how much each Supplier's imbalance volume is. It is therefore important that the data entering the SVA Agent (SVAA) run is accurate. As such, a number of checks are currently used to validate the data in the SVA run. The SVAA operator currently checks for completeness of data, that is whether all the expected data files have been received. They also check for duplication of data. In the cases where duplication is found or data is incomplete then this is addressed by respectively removing the duplicated data or defaulting values where it is missing.

Finally, where variances in Grid Supply Point (GSP) Group Correction Factors (GCFs) are above a threshold of 10 or less than 0, the SVA run will fail and an exception report will be created. The threshold is set at these limits to identify when erroneous data is at a significant level. The GSP Group Correction Factors (GGCFs) are used to ensure the total energy allocated to Suppliers in each Settlement Period in each GSP Group matches the energy entering the GSP Groups from the Transmission System, adjoining GSP Groups and through embedded generation.

## What is the issue?

Each year there are on average 2.7 Trading Disputes caused by erroneous data used in SVA runs. The materiality of the average Trading Dispute is approximately £600k with some being 5-10 times larger and the average resolution taking four months. The issue is caused by erroneous data entering the SVAA Run and not being adequately identified by the current validation checks. This is because there are no assessments of the energy volumes or Metering System Identifier (MSID) counts within the DA files.

Moreover, there are situations where the SVAA operator is aware of erroneous data but cannot get the DA to submit valid data in time for the SVA run. In these situations, the SVAA operator needs the ability to default data as appropriate. However this is not currently possible, because the SVAA operator requires intervention by another SVAA system administrator to delete duplicate or erroneous data files before defaulting can occur. The result is the erroneous data is used which may cause Trading Disputes.

The final issue is that the exception reports created when variances in GGCFs are above a threshold are not adequate. This is because the thresholds are not realistic and do not identify erroneous data when they should. In addition, the exceptions do not always lead to the SVA run being stopped and so files can be sent out to Suppliers when erroneous data is present. In the cases when the SVA run is not automatically stopped as a result of an exception report, the SVAA operator is not able to manually stop the run and address the issues. This results in SVA runs being inaccurate and can lead to Trading Disputes where there is clearly an issue with the input consumption data.

### Proposed solution

ELEXON raised [CP1484 'Introduction of Additional SVAA Validation at SVA Run time'](#) on 8 February 2017. The CP proposes that three new processes, outlined below, are implemented.

#### 1: Validate an individual DA data flow

This validation process aims to capture erroneous data in submitted DA files prior to the Volume Allocation Run (VAR). Initially, the DA will send the files of consumption data for each GSP Group to the SVAA. The SVAA will be modified so it can automatically validate data to ensure it is suitable for use in Settlement. These validation checks will assess the plausibility of consumption values by comparing against appropriate recent data files from the same DA and should identify any major errors or discrepancies. When the data changes are outside tolerances the SVAA must notify the DA who will reassess the validity of the data files, address any issues and re-submit to the SVAA prior to SVAA run time. This prevents the SVA operator having to default the data and enables the SVA run to use the actual data files which are more accurate.

#### 2: Ensure there is a complete set of DA data ready for the VAR

This process sets out the steps for one GSP Group for a specific Settlement Day and Settlement Run. However, it is recognised that the SVAA operator will need to carry out the process for all GSP Groups and for several different Settlement Runs within the same time window on a given Business Day. Although this is similar to the existing data marshalling process, it gives the SVAA operator the ability to default data, when identified as erroneous, without support from SVAA system administrators in two new ways:

- Substituting default data when required (manually); and
- Substituting default data when required (automatically).

Please note, that the SVAA operator will need to get permission from BSCCo to default data and this is the current working practise. This process may follow the quarantining of the suspect file identified in process 1 above. It is intended to make the defaulting process easier for the SVAA operator than is currently possible.

#### 3: Carry out the VAR and check results

When the VAR calculations are run, aggregate consumption information is then available for each GSP Group as a whole. This makes it possible to perform additional checks on the results to identify whether the results are plausible. This process summarises the steps required for a GSP Group for a given Settlement Day and Run and is repeated for every GSP Group.

This solution focuses on the checks made on the out-turn data and the results, and does not change the actual volume allocation calculations. Two additional checks are proposed



#### Data marshalling process

The data marshalling process ensures that all files for a VAR have been received or defaulted as appropriate.

- Checks on volume to be corrected in each GSP Group and Settlement Period. The checks will provide an exception report of any volumes outside defined tolerances; and
- Checks on each GSP Group Correction Factor per Settlement Period. The checks will provide an exception report of any volumes outside defined tolerances.

Where a tolerance has been breached the SVA run will be aborted while a further investigation is undertaken by the SVAA operator. Data issues identified will be addressed before the run is re-initiated. An override facility will be provided where data issues cannot be identified in a timely manner.

These checks highlight to the SVAA operator that following the checks in processes 1 and 2, there are still issues that need to be resolved. The exception report and data will be provided to ELEXON for investigation where the SVAA operator cannot resolve at run-time. ELEXON will attempt to resolve any issues by first trying to get the original data from the DA and if this is not possible by defaulting the data before next reconciliation run.

The expectation is that this process will be infrequent following the implementation of processes 1 and 2 and is intended to trap any residual issues that need to be addressed.

### Update tolerances for SVA run

The parameters for the tolerances will also be updated before implementation of this CP to ensure they are accurate. ELEXON will analyse recent GCF values and Half Hourly (HH) and Non Half Hourly (NHH) consumption volumes to identify acceptable ranges within which correct values should lie. During the testing phase of the implementation of this CP, the parameters will be refined. Finally, they will be reviewed on annual basis and updated when necessary.

### Proposer's rationale

Significant error in data quality impacts all Parties and gives rise to Trading Disputes. Some errors can cause financial hardship to smaller participants if they cannot be resolved in a timely manner. These changes are intended to trap, replace or default erroneous data in a more efficient manner than is currently possible.

#### CP Consultation Question

Do you agree with the CP1484 proposed solution?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment E

## Proposed redlining

Attachments A-D contains the proposed changes to the Balancing and Settlement Code Procedure (BSCP) 503, BSCP508, SVA Data Catalogue Volume 1 and the SVAA User Requirement Specifications (URS) to deliver CP1484.

Please note that BSCP508 and the SVAA URS set out the new processes for the SVAA to validate at SVA run time. However, BSCP503 and the SVA Data Catalogue Volume 1 are not relevant to the solution and are only being included to update them so they align to current practise. There are no anticipated impacts or costs to central systems as a result of updating BSCP503 or the Data Catalogue Volume 1.

### CP Consultation Question

Do you agree that the draft redlining delivers the CP1484 proposed solution?

*If 'No', please provide your rationale.*

We invite you to give your views using the response form in Attachment E

## 3 Impacts and Costs

### Central impacts and costs

CP1484 will require a change to BSCP503, BSCP508, the SVA Data Catalogue Volume 1, SVAA URS and will cause an impact on the SVAA system.

The central implementation costs for CP1484 will be approximately £153,000 to implement document and system changes. This is based on a 22 week project to update the software and carry out relevant testing, which was determined in a service provider impact assessment. The panel will be required to approve the central implementation costs for CP1484 as per the SVG Terms of Reference, Section 4.2 'Specific Powers and Functions', sub-section 4.4.2 paragraph 7. This requires that central implementation costs above £150k (including BSCCo and BSC Agent costs, but excluding participant costs) be approved by the Panel.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP503 'Half Hourly Data Aggregation for SVA Metering Systems Reregistered in SMRS</li><li>BSCP508 'Supplier Volume Allocation Agent'</li><li>SVA Data Catalogue Volume 1</li><li>SVAA URS</li></ul>	<ul style="list-style-type: none"><li>SVAA system</li></ul>

### BSC Party & Party Agent impacts and costs

We believe this change will only impact HH and NHH DAs and will only impact their procedures. We seek confirmation of this via this consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHDA's and NHHDA's	There are possible impacts on their procedures as this change may identify more issues with the VAR data than identified currently.

### CP Consultation Questions

Will CP1484 impact your organisation?

*If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1484 and the CP1484 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.*

Will your organisation incur any costs in implementing CP1484?

*If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.*

We invite you to give your views using the response form in Attachment E

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## 4 Implementation Approach

### Recommended Implementation Date

CP1484 is proposed for implementation on 2 November 2017 as part of the November 2017 Release. This aligns to the implementation of CP1478 ['Automate the loading of the DF Matrix'](#) which also requires system changes to the SVAA and is the earliest Release that this CP can be included in.

#### CP Consultation Question

Do you agree with the proposed implementation approach for CP1484?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment E

### SVG's initial views

CP1484 was presented to the SVG at its meeting on 28 February 2017 ([SVG193/07](#)).

The SVG were positive about the change and believed it would improve the BSC baseline.

They did, however, have some questions about the CP. Firstly, an SVG member discussed concerns about the scope of the SVAA operator being too broad as the solution seems to suggest they will be able to default Bid Offer Acceptance (BOA) data with little oversight and hence there is a need for controls. ELEXON explained that the SVAA operator will need to ask BSCCo for permission to default data and that this will be clarified in the consultation paper (this paper).

Secondly, the tolerance calculations that will be modified in the third additional validation step outlined in the 'Proposed Solution' section above will be materially important to industry and so an SVG member asked that more detail be given for consultation. ELEXON agreed to provide more details which are discussed in the solution section.



## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
BM	Balancing Mechanism
BOA	Bid Offer Acceptance
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
DA	Data Aggregator
GCF	Group Correction Factor
GSP	Grid Supply Point
GGCF	Grid Supply Point Group Correction Factor
MSID	Metering System Identifier
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
URS	User Requirement Specifications
VAR	Volume Allocation Run

### 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
3	CP1484 webpage	<a href="https://www.elexon.co.uk/change-proposal/cp1484/">https://www.elexon.co.uk/change-proposal/cp1484/</a>
7	SVG 193 meeting	<a href="https://www.elexon.co.uk/meeting/svg-193/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-193/">https://www.elexon.co.uk/meeting/svg-193/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-193/</a>