

Change Proposal – BSCP40/01

CP No: 1164

Version No: 2.0

Title *(mandatory by originator)*

Improvements to BSCP27 identified during operational use with respect to Meter Technical Details and other supplementary information

Description of Problem/Issue *(mandatory by originator)*

Problem/Issue:

A number of issues relating to Meter Technical Details (MTDs) have been identified during the operational use of BSCP27 ‘Technical Assurance of Half Hourly Metering Systems for Settlement Purposes’. These issues have been identified by market participants, the Association of Meter Operators (AMO), the Technical Assurance Agent (TAA) and ELEXON. Most of these issues are as a result of MOAs carrying out an exchange of Meter prior to the audit, with updated MTDs not being provided by one or more participants.

These issues are as follows:

1. BSCP27 requires the MTDs from the Supplier/Registrant and the Half Hourly Data Collector (HHDC)/Central Data Collection Agent (CDCA) to be provided to the TAA so that these can be audited for compliance. The MTDs supplied by the Supplier/Registrant or the Meter Operator Agent (MOA) on behalf of the Supplier/Registrant are not necessarily the MTDs used for Settlement purposes; and there are a large number of non-compliances raised due to mismatches between the three sets of MTDs supplied. As it is only the HHDC/CDCA MTDs that are used in Settlement, the Technical Assurance audit should focus on the accuracy of the MTDs provided by the HHDC/CDCA. ELEXON considers that a significant proportion of category 1 non-compliances raised are inappropriate for the reasons given above.
2. BSCP27 requires Additional Metering Equipment Technical Details (AMETDs)¹ to be provided by the Supplier/Registrant, but it is the MOA that holds and maintains the information and in practice provides this to the TAA.
3. From time to time the TAA may select a ‘complex site’ for an inspection visit (defined as per BSCP502). Currently within BSCP27 there is no requirement for the Complex Site Supplementary Information Form to be provided to the TAA. This information is held by both the MOA and the HHDC although it is the MOA who maintains the information.
4. Section 4.2 ‘Reasons for Failure or Issue of Non-Compliance’ of BSCP27 is limited in the amount of guidance that can be provided and can cause both issues and confusion. For example BSCP27 categorises the non-compliance into three categories:
 - ‘category 1’: where a non-compliance which is deemed to be currently affecting the quality of data for Settlement purposes;
 - ‘category 2’: where a non-compliance which is deemed to have the potential to affect the quality of data for Settlement purposes; and,
 - ‘observation’: where a non-compliance has been identified which is deemed neither to

¹ The definition of AMETD is included within BSCP27, Section 1.13.

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affect nor have the potential to affect the quality of data for Settlement purposes.

The TAA when reporting a non-compliance will define the non-compliance using sub-categorisations of the categories above to indicate reasons for a non-compliance. A non-exhaustive list of these is included in BSCP27 section 4.2 as a means of guidance to participants. This table **does not stop** the TAA raising a new type of non-compliance that is not listed in BSCP27 as non-compliances are raised against Codes of Practices. However, it can sometimes restrict the TAA's ability to raise a non-compliance as a specific category, and removes the ability to use a 'common sense' approach. For example, the table in 4.2 states that where a Supplier sends an MTD that has an incorrect Meter serial number a category 1 non-compliance should be raised, even though a category 2 non-compliance would be more appropriate. An MTD sent from a Data Collector with an incorrect Meter serial number, however, would be appropriate to class as a category 1 non-compliance as this is the data that is actually being used in Settlement.

A second table in section 4.2 lists tolerance levels relating to Metering System timing errors. These are however defined in the relevant CoPs, so they do not need to be included in BSCP27. It is believed that placing such items in a guidance note on compliance on the BSC Website would be a more practical and suitable approach.

Version 2.0 of CP1164 also seeks to address comments and queries raised during the Industry Impact Assessment via CPC00575.

Proposed Solution(s) (mandatory by originator)

The following solutions correspond to the issues identified above:

1. It is proposed that only the MOA and Data Collectors will be required to provide MTDs. However, the Supplier may want to seek assurance that the MTDs it holds are consistent to those held by its agents and as such may want to submit these to the TAA for validation. *Attachment 2 'Interface Timetable'* sets out the proposed changes.

If a non-compliance is found in the MTDs held by the Data Collector, these will be considered a material non-compliance (and raised as a category 1 non-compliance), as only the Data Collector's MTD are used in Settlements and will therefore be deemed to be currently affecting the quality of data in Settlements if they are incorrect. Any non-compliance found in the MTDs held by the MOA or Supplier/Registrant is not used in Settlements and therefore can not be deemed to be currently or potentially to affect the data in Settlements; however, the MOA MTDs will be required to benchmark the Data Collector's MTDs (and will therefore be raised as a category 2 non-compliance).

Attachment 1 'MTD provision and validation' provides a flow diagram of the proposed new process. This also includes the categories of non-compliance associated with non-provision of MTDs and the provision of incorrect MTDs that will be used, for information. Further, it also takes into consideration the possibility of a Meter exchange happening immediately prior to an

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inspection (as this is a relatively common occurrence) and which need to be treated separately. *Attachment 1* is only provided here for information and will not be included within BSCP27, but will form part of a separate guidance document that will be developed and published on the ELEXON (BSCCo) Website, subject to approval of this change. This guidance will also include possible root causes of non-compliances and rectification guidelines for participants.

2. It is proposed that the current practice of the MOA providing AMETDs is reflected within BSCP27. *Attachment 2 'Interface Timetable'* sets out the proposed changes.
3. It is proposed that a step is added to BSCP27 whereby the HHDC and SVA MOA are required to provide the BSCP514/8.4.8a Complex Site Supplementary Information Form if the MTDs indicate that the Metering System is complex. *Attachment 2 'Interface Timetable'* sets out the proposed changes.
4. Section 4.2 would be removed from BSCP27. The table that lists tolerance levels relating to Metering System timing errors will be placed in a guidance note that will detail issues surrounding non-compliance and will be published on the BSC Website. As previously explained there is little benefit of including this table as part of BSCP27 and it would be more practical to show such information as guidance on the BSC Website.

The table providing a non-exhaustive list of non-compliance would be removed and the information placed into a guidance note published on the BSC Website. This table has only a limited value as guidance in BSCP27 and could be presented with more clarity as part of a guidance document on the BSC Website. As stated previously, the information in the table does not stop the TAA from raising non-compliances that are not located in the table. The table does however limit the way that the TAA can categorise non-compliances, which results in issues that are category 2 non-compliances becoming category 1 non-compliances. (see above for example).

As a result of Industry Assessment the attachments to CP1164 have been updated to reflect the following:

- BSCP27 now states that submission of MTDs by SVA MOAs will be “On the day of the Inspection Visit or within 10 WD of receipt of TAA request”.
- The flow diagram in attachment 1 has been updated, as part of the Meter exchange scenario, and reflects that when new MTDs have been submitted by the DC (and those MTDs are compliant) that the TAA amends the previously raised category 2 non-compliance to ‘compliant’. It should be reiterated that attachment 1 is only for information to aid understanding on how ELEXON and the TAA propose to raise non-compliances for these types of scenario once the CP has been implemented. The guidance does not deal with other possible scenarios, such as continual re-submission of new MTDs, which would be considered part of the rectification of non-compliance process. Furthermore, this guidance will not form part of the BSCP.

Concerns were raised regarding change control of the web-based guidance that will replace BSCP27/4.2. Guidance is not part of the change management processes covered under BSCP40,

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<p>nor is it intended to be; however, ELEXON always endeavours to ensure that its contacts are aware of the latest guidance and any changes that are made. In addition, ELEXON recently introduced myELEXON, which allows participants to be made aware of any changes to documents on the BSC Website. ELEXON also regularly consults with participants (particularly through the Association of Meter Operators) when producing guidance and will be seeking to gain Performance Assurance Board approval whenever an interpretation of requirements and how that is audited is not clear. It should again be noted that currently the TAA can raise any non-compliance, as long as it is against a CoP requirement, and does not have to go through a formal change control process.</p> <p>Comments were raised regarding the definition of non-compliance types. It should be noted that it is not within the remit of this CP to change these definitions or to define the actual, or potential, materiality of non-compliance. Similarly, removing the observation non-compliance category as suggested in one response would require a Code modification. Any such modification would need to be raised by a BSC Party as ELEXON does not have the viries to raise a modification of this type.</p>	
<p>Justification for Change <i>(mandatory by originator)</i></p> <p>The changes proposed will significantly reduce operational effort, and therefore costs relating to the Technical Assurance of Half Hourly metering process for all parties concerned. The changes proposed are minimal document-only changes, and therefore will have minimal implementation costs for ELEXON. There is also strong support from the industry to implement these changes as they should lead to an increase in the efficiency of the service, by streamlining the overall number of non-compliances, and also an improvement in the transparency of the service by improving the clarity of the process and by removing the inconsistencies.</p>	
<p>Is the Change being proposed a Housekeeping Change? <i>(optional by originator)</i></p> <p>No²</p>	
<p>Configurable Items Potentially Affected by Proposed Solution(s) <i>(optional by originator)</i></p> <p>BSCP27, BSC Service Description for SVA Technical Assurance, BSC Service Description for CVA Technical Assurance.</p>	
<p>Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(optional by originator)</i></p>	
<p>Related Changes and/or Projects <i>(mandatory by BSCCo)</i></p>	

² The relevant Panel Committee will decide whether a Change Proposal can be progressed as a Housekeeping Change Proposal.

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Requested Implementation Date (<i>mandatory by originator</i>) <i>Next available Release</i> Reason: The changes will significantly reduce operational effort, and therefore costs relating to the Technical Assurance of Half Hourly metering process for all parties concerned.	
Agreed Release/Implementation Date (<i>mandatory by BSCCo</i>)	
Originator's Details: BCA Name Organisation.....ELEXON Email Address Date.....10 April 2006	
Attachments: Yes (Attachment 1 – MTD provision and validation – 3 pages, Attachment 2 – Interface Timetable – 20 pages)	