

BSC Auditor's Issue Document for the Licensed Distribution Market as at 31 March 2011

Issue Title: Failure to send de-energisation requests prior to disconnection	Issue number: 1922	BU: N/A	BSC Report Reference: SSM 17	First raised: March 2006	Status: Open Closed Rectified in Period	Impact Rating: Medium	Confirmation of Issue Status: Agreed Not Agreed
	Old associated Issue: N/A						

BSC Requirement:

Per BSCP 515 3.7, Prior to any SVA disconnection, the Metering System must be de-energised in accordance with BSCP 515 Section 3.6.

How the organisation is in breach:

Our work in prior audit periods identified that there are a number of LDSOs that will process a disconnection request from Supplier (D0132) without checking that it is de-energised first.

Very few LDSOs were using the D0262 to reject disconnection requests as a result of not having received a D0134 first. Prior to any disconnections Suppliers should be sending de-energisation requests on a D0134 flow – this was found not to be happening across the market.

In 2008 ELEXON implemented Change Proposal ('CP') 1184 'Disconnection of Energised Metering Systems' in regards to the disconnection in emergency situations, allowing a simultaneous disconnection and de-energisation. The aforementioned CP1184, whilst resolving the emergency disconnection aspect of this issue has caused greater ambiguity in regards to the processing of 'energised disconnections.' We understand that a new process for bulk and distribution business initiated disconnections is currently being developed by the MRA issues resolution group (IREG). There is therefore a potential change to BSCP 515 which will enable LDSO's to disconnect metering systems without acknowledgement from the MOA that the site has been energised. The practicalities of how this would impact the processes as determined by the BSCP are yet to be assessed, however, are due to be completed once the MRA work has been finalised.

For the current period ended 31 March 2011, we noted that this issue continues to impact a number of LDSOs. Our work found that whilst some LDSOs will now reject logical disconnection requests whereby the MPAN is still energised they will not reject a physical request to disconnect. This is due to the logistical impracticalities of having to send an operator to site to de-energise and then re-visit the site to disconnect once the relevant flows have been sent. Our work has noted a slight improvement in the year regarding the number of individual issues raised on each of the LDSOs, however ongoing discussions with all LDSOs throughout our site visits illustrated the need for further clarification to overcome the inherent impracticalities currently embedded in this process. Whilst the BSC Auditor recognises that there may be inherent impracticalities in this process, the LDSOs and their associated Suppliers remain in breach of the requirements.

Total Population	N/A	Sample size	N/A	Number of Exceptions	N/A	Assessed Materiality (MWh)	N/A
Has the Audit Issue improved over the last 12 months?				Yes	No	Stayed the same	N/A

BSC Auditor's recommendation:

We continue to recommend that ELEXON liaise with the LDSO in an effort to understand the impracticalities surrounding the disconnection process and subsequently determine a solution to suit all parties.

ELEXON Use Only**EFR Complete:**

Yes No

This issue has been identified during the course of the BSC Audit. The scope of the BSC Audit is focused on considering whether Settlement Processes are operating satisfactorily within the agreed materiality level (currently 1,650,000MWh), and hence (a) may not identify all weaknesses at a specific Audited Entity, and (b) is focused only on areas of non-compliance with the BSC and does not consider the operational effectiveness of the systems and processes in place at individual Audited Entities. This issue is confidential and is intended solely for the use of ELEXON Limited ('ELEXON'), Trading Parties to the BSC and the Panel. The information contained in this document may not be relied upon by any other party.

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Issue Title: Response to D0134 flows in regards to temporary de-energisations	Issue number: 2447	BU: N/A	BSC Report Reference: SSM 17	First raised: March 2011	Status: Open Closed Rectified in Period	Impact Rating: Lower	Confirmation of Issue Status: Agreed Not Agreed
	Old associated Issue: N/A						
<p>BSC Requirement: BSCP 514 section 6.3.1 requires the NHHMOA to send a D0139 flow to confirm energisation and an initial meter reading on a D0010 ('Meter Readings') flow to the NHHDC Agent within 10 working days of changing the energisation status.</p> <p>Note 13 in BSCP515 states that if there is a failure to change the energisation status, the D0139 flow shall be sent only to the Supplier. If the energisation status is changed but a Meter register reading cannot be taken, the D0139 flow shall be sent to all of the above recipients and a D0002 'Fault Resolution Report or Request for Decision on Further Action' shall be sent to the NHHDC.</p>							
<p>How the organisation is in breach:</p> <p>Our work noted for the year ended 31 March 2011 that where an electrician wants a temporary de-energisation and re-energisation on the same day, then the relevant party attends and disconnects the old equipment, and reconnects the new equipment. In practice; upon request for a de-energisation by either the customer, or the party undertaking the work on behalf of the customer, the appointed Supplier will instruct either the Meter Operator, or the relevant distribution company, to de-energise the premises. (NB in the case of fuse-isolated Low Voltage connections, de-energisation will ordinarily be undertaken by the Meter Operator. In the case of large power Low Voltage switchgear isolated connections, High Voltage and Extra-High Voltage connections the de-energisation request will ordinarily be undertaken by the relevant distribution company, because of locking, access and operational control requirements).</p> <p>Accordingly the Supplier will send a D0134 flow to the MOA or distribution company to request the meter to be de-energised or energised. However, these are not being responded to by a number of Agents within the market as they do not believe they can be accurately or appropriately responded to. This is due to the fact that the date of action field within the D0139 (i.e. the J0014) is only made up of 8 characters and therefore does not allow a time to be populated within the flow. In many instances this will then result in the relevant LDSO or MOA deleting the incoming flow. Furthermore, due to the setup and configuration of some Supplier systems they will send additional D0134 flows as the previous flows are deemed to be 'unactioned.'</p>							
Total Population	N/A	Sample size	N/A	Number of Exceptions	N/A	Assessed Materiality (MWh)	N/A
Has the Audit Issue improved over the last 12 months?			Yes		No	Stayed the same	N/A
<p>BSC Auditor's recommendation:</p> <p>ELEXON should liaise with the LDSOs and MOAs in an effort to understand the impracticalities surrounding the temporary de-energisation and energisation process and subsequently determine a solution to suit all parties.</p>							
<u>ELEXON Use Only</u>	EFR Complete:						
	Yes <input type="checkbox"/> No <input type="checkbox"/>						

This issue has been identified during the course of the BSC Audit. The scope of the BSC Audit is focused on considering whether Settlement Processes are operating satisfactorily within the agreed materiality level (currently 1,650,000MWh), and hence (a) may not identify all weaknesses at a specific Audited Entity, and (b) is focused only on areas of non-compliance with the BSC and does not consider the operational effectiveness of the systems and processes in place at individual Audited Entities. This issue is confidential and is intended solely for the use of ELEXON Limited ('ELEXON'), Trading Parties to the BSC and the Panel. The information contained in this document may not be relied upon by any other party.