

BSC Auditor's Issue Document for the Meter Operator market as at 31 March 2011

Issue Title: Ongoing Problem With Quality of D0268s	Issue number: 1639	BU: N/A	BSC Report Reference: N/A	First raised: March 2002	Status: Observation Open Closed Rectified in Period	Impact Rating: Higher	Confirmation of Issue Status: Agreed Not agreed
	Old associated Issue: N/A						
BSC Requirement: BSCP514 Section 2.4.1 'Information to Data Collectors' states that 'upon any change of Meter Technical Details or any change of Associated Data Collector or upon the MOA's appointment in respect of a SVA Metering System, the MOA shall give Meter Technical Details, commissioning details and access details of the SVA Metering System and its energisation status at feeder level to its Associated Data Collector.' Furthermore the HHDC Agent is required by section 3.2.1.3 of BSCP502 to update its systems with the MTDs provided by the MOA.							
How the Business Unit is in breach: Work in the prior audit periods identified a number of metering systems for which there were differences in the level of consumption between runs. On investigation, many of these movements related to the processing of multiple D0268s, many of which contained erroneous MTD data, provided by several MOAs. The main issues identified from the sample were as follows: <ul style="list-style-type: none"> • incorrect pulse multipliers and meter constants; • incorrect set up of number of meters or number of registers; • erroneous identification of main and check meters; and • incorrect mapping of channels/registers. <p>The responsibility for providing accurate MTDs lies with the MOAs. During the audit year ended 31 March 2009 a paper was presented to the Supplier Volume Allocation Group (SVG) to request guidance on how this issue should be resolved. The view of the SVG was that as the D0268 flow is populated by HHMOA the responsibility for reducing the incidence of this anomaly lies with them. The SVG requested therefore that ELEXON write to all HHMOAs asking them to confirm what measures are in place to ensure correct population of.</p> <p>In addition the following actions have been undertaken by ELEXON in previous years:</p> <ul style="list-style-type: none"> • CP1214 (Removal of PSL130 'Half Hourly Data Collection' following the creation of a generic non functional PSL via CP1182) was included in the Feb 2008 release; • CP1243 (Mandating HHDC checks on quality of Meter Technical Details) raised in April 2008 but rejected by the SVG in June 2008; and • CP1248 'Early release of Meter Technical Details by Non Half Hourly Meter Operator Agent' was included in the November 2009 release. <p>Audit work performed in the year ended 31 March 2011 noted 4 MPIDs as being specifically impacted by the ongoing problems with the quality of D0268s.</p>							
Total Population	N/A	Sample size	N/A	Number of Exceptions	N/A	Assessed Materiality (MWh)	N/A
Has the non compliance improved over the last 12 months?				Yes	No	Stayed the same	N/A
BSC Auditor's recommendation: Whilst we recognise that various initiatives have been taken in an attempt to reduce or resolve the problems. We reiterate our previous recommendation that ELEXON considers facilitating a review of the controls in place within the BSC and BSCP to identify any areas where process enhancements can be made to reduce the repeat occurrence of such issues.							
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EFR Complete:							
Yes <input type="checkbox"/> No <input type="checkbox"/>							

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Issue Title: Limitations in BSCP requirements	Issue number: 1640	BU: N/A	BSC Report Reference: N/A	First raised: March 2002	Status: Observation Open Closed Rectified in Period	Impact Rating: Medium	Confirmation of Issue Status: Agreed Not agreed
	Old associated Issue: 0866						

BSC Requirement:
BSCP514 details the actions required from MOAs over Half Hourly and Non Half Hourly Metering Systems.

How the Business Unit is in breach:

This issue was previously detailed in BSC Auditor Issue 866. BSCP 514 provides the requirements under which MOAs must perform their responsibilities. Review of the BSCP and our work at MOAs previously identified a number of areas where the meter operations details were considered not to be prescriptive enough. Specific limitations noted were as follows:

1. MOAs use Data Transfer Network ('DTN') data flows for dealing with prepayment meters, such as the D0192 'Readings and Settings from a Token or Key Meter' flow and the D0216 'Request Installation of Token' flow. BSCP514 does not include guidance on the use of these flows; and
2. BSCP 514 sections 7.1 to 7.4 provide guidance over change of Measurement Class from Non Half Hourly to Half Hourly and vice-versa. One of the requirements is that the incoming MOA is required to send the final meter register readings to the outgoing MOA on a D0010 flow, or if the reading is not available a D0002 flow should be sent. However the principal method of communication between these Agents, the DTN, does not support the sending of these flows between MOAs.

For the year ended 31 March 2011 we noted that both NHHMO and HHMO Agents, struggle with the change of measurement class (CoMC) processes. As examples and including point 2 above:

- It can be difficult for the incoming Meter Operator to identify a CoMC from any other appointment as there is no flag or code in the D0155 – although there is one, albeit rarely used, in the D0151.
- Often the D0142 flow is the point at which they are identified but only via the free text entered by the Supplier, which is extremely variable in its extent and quality.
- The process requires the sharing of Meter Technical Details but often MOA systems are not configured to accept those flows which can then hamper the process, e.g. a HHMO will send a D0268 to a NHHMO or a NHHMO will send a D0150 to a HHMO.

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

BSC Auditor's recommendation:

We recommend that ELEXON look to engage with MOAs to resolve the aforementioned issues. With regard to the CoMC processes it may be opportune to review this process whilst volume are relatively low such that should volumes increase a robust and workable process, with appropriate guidance, is already in place.

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EFR Complete:

Yes No

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Issue Title: Inconsistent action taken in response to D0001 flow	Issue number: 2051	BU: N/A	BSC Report Reference: SSM 12	First raised: March 2002	Status: Observation Open Closed Rectified in Period	Impact Rating: Higher	Confirmation of Issue Status: Agreed Not agreed
	Old associated Issue: N/A						
BSC Requirement: BSCP514 includes details of the actions required by the Meter Operator Agent in respect of their actions upon receipt of a D0001 'Request Metering System Investigation' flow, and the required responses. BSCP514 Section 5.4.1.3 states that within 5 working days ('WD') of receiving a D0001 flow from a Supplier or HHDC, the HHMOA should investigate the metering system and resolve the problem if possible. BSCP514 Section 5.4.1.5 states that if the fault remains unresolved 5 WD after receipt of the D0001, the HHMOA should send notification that the fault cannot be resolved within 5 WD, and send a corresponding fault resolution plan (if required) detailing the actions that need to be taken to resolve the fault and the proposed timescales. If appropriate the HHMOA should request decision on further action if appropriate using a D0005. If the HHMOA is able to resolve the fault within 5 WD they should send a fault resolution report on a D0002, as per Section 5.4.1.12. BSCP514 Section 6.4.1.2 states that within 2 WD of receiving a D0001 flow from a Supplier or NHHDC, the NHHMOA should investigate the metering system and resolve the problem if possible. BSCP514 Section 6.4.1.4 states that within 5 WD of 6.4.1.2 if the NHHMOA is unable to resolve the problem they should send a send request for decision on further action on a D0002 Request for Decision on Further Action to the Supplier. If they can resolve the problem within 5 WD of 6.4.1.2 they should send a Fault Resolution Report to the Supplier and the NHHDC on a D0002, as per Section 6.4.1.7.							
How the Business Unit is in breach: Audit testing performed by the BSC Auditor at an MOA in previous audit periods identified that the Agent was not taking any action to investigate faults reported to it by the Data Collector (HH or NHH). Based on information received from a number of other MOAs we noted that the approach taken to resolving D0001s from NHHDCs does vary for NHHMOAs, with some taking action and others only working those received from the Supplier. In all instances the HHMOA Agents process D0001s irrespective of whether they are received from the Supplier or the HHDC. Testing for the year ended 31 March 2011 noted that this continues to be an issue across two NHHMOAs despite the introduction of CP1192 'Changes to the Investigate Inconsistencies processes in BSCP502 and BSCP514 (Half Hourly only)' in June 2008. An ongoing issue with the use and application of D0002 flows upon the resolution or non-resolution of the fault has also been noted. A number of MOAs have indicated that they consider there to be a lack of clarity in respect of the use of the D0002 flow and this has contributed to inconsistent actions being taken in response to the D0001 flow. One MOA stated that D0001s were being received as requests to obtain a meter reading rather than to investigate an inconsistency. A number of Suppliers have indicated that they are unable to differentiate between those D0002s that are required to be actioned and those D0002s that are simply sent for information purposes (i.e. where resolution by the MOA has been obtained). Consequently this is creating a bottleneck in the resolution of D0001s as some flows may continue to be sent despite a resolution having already been sought and provided.							
Total Population	N/A	Sample size	N/A	Number of Exceptions	N/A	Assessed Materiality (MWh)	N/A
Has the non compliance improved over the last 12 months?				Yes	No	Stayed the same	N/A
BSC Auditor's recommendation: We reiterate our prior year recommendation that ELEXON clarify the requirements around the use of both the D0001 and D0002 flows and how they interact. Whilst we acknowledge that guidance is provided within the BSCP514 we believe that ELEXON should facilitate further discussion in this area to promote a consistent approach across the industry.							
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EFR Complete:							
Yes <input type="checkbox"/> No <input type="checkbox"/>							