

ELEXON

BSC SANDBOX IMPACT ASSESSMENT AND CONSULTATION FOR GOOD ENERGY

Elexon's Impact
Assessment and a public
consultation on Good
Energy's BSC Sandbox
application

Public

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Good Energy Proposal

Good Energy have raised a BSC Sandbox request for a derogation against the BSC provisions preventing them from appointing different Supplier Agents for Import / Export Metering Systems where DCC enabled Smart Meters are installed. This will allow them to remove a barrier preventing the use of Export Metering System IDs (MSIDs) for small-scale micro generation. The current arrangements mandate that the agents across MSIDs sharing a Meter used for Import / Export purposes must align. This is to prevent issues with different Data Collectors trying to contact the same Outstation at the same time and for two different Meter Operators having to manage the same asset.

Good Energy want to use the functionality of the Smart Meters installed by many of their customers currently enrolled in the FiT scheme, to register Export MSIDs for these sites and accurately settle the Export generation. Currently they are finding that the existing arrangements around agent appointments are causing them a large and unnecessary administrative burden in making use of the metered export process. This is due to the Import Suppliers Agents either being unwilling to accept a Good Energy appointment, or requiring prohibitively expensive contract terms to provide a service.

Good Energy are proposing a trial whereby they can appoint their own contracted agents to Export MSIDs with DCC enabled SMART meters installed, rather than appointing the same agents appointed to the Import MSID as mandated in BSC Section J. They argue that as the DCC will be used to obtain reads from the Meter, rather than the DC direct, appointing a different DC has small risk. For the duration of the trial they will implement manual processes to ensure that the transfer of Meter Technical Details continues for affected MSIDs and work with their contracted MOA to mitigate other risks.

Good Energy believe that this derogation will allow them to launch their small scale generation product and prove that the use of smart export for microgeneration is viable. The results of the trial would also feed into the cost-benefit analysis of a potential BSC Modification that they are intending to raise.

The proposed approach involves Good Energy accessing the HH Data from the DCC direct before providing it to their appointed HHDC for settlement purposes (as per the standard elective HH process). They will also implement a manual workaround for the update of MTDs where Meters have been exchanged, and contractually ensure that their appoint MOA does not attend the site to work on the Meter.

Good Energy are proposing a trial of 50,000 MSIDs from the date of approval, ramping up to 100,000 MSIDs from April 2023. They expect the trial to last two years, but would request an extension should any modification be raised (which is their intent). Good Energy recognise that this trial would involve significantly more MSIDs than other recently approved BSC Sandbox applications. However, they require a large population of MSIDs to adequately test the solution across multiple parties and types of agents and to ensure enough of the trial population is subject to a Meter exchange.

An enduring solution is likely to involve updated automated processes for the transfer of Meter Technical Details.

Since the go live of the Retail Energy Code (REC) version 2, the appointment of MOAs has been governed under the REC Metering Operation Schedule. As such this is a cross code Sandbox application.

Draft Elexon consideration of Impacts on other Parties

Elexon are required to provide a view on the impacts that operating the derogation will have on other Parties. This consideration is distinct from our consideration of the risks to settlement of operating the derogation.

Elexon believe that this derogation will have a small downstream impact on all the Suppliers (and their Supplier Agents) of the import MSIDs with associated export included in the trial.

Good Energy are proposing to conduct daily checks on the Electricity Enquiry Service (EES) and use daily data download checks from the DCC to check for any updates to the Meter or Meter Setup. This will allow Good Energy to proactively recognise any changes to the asset and chase for relevant updates. Which will, providing this largely manual process is operated successfully, mitigate the risk of Meter Technical Detail updates not being processed correctly.

In addition, the risk of two different MOAs trying to work on the same Meter, resulting in incorrect action being taken on the import Suppliers MSID, is mitigated by Good Energy instructing their appointed MOA to not carry out any physical metering work.

Lastly the potential for two Data Collectors to dial the meter at the same time and interfere with the import supplier's ability to retrieve reads is removed as this trial only includes DCC serviced Smart Meters where Data Retrieval is carried out via the DCC.

Consultation questions

1. How, if at all, will you be impacted by the operation of the proposed derogation outlined in this document? Please refer to the draft Elexon consideration of Impacts on Other Parties (in this document) and the draft Good Energy Elexon Risk Assessment.

Retail Energy Code Consultation Question

In addition to their obligations in the BSC, Good Energy need to remain compliant with the Retail Energy Code (REC). After consultation with The Code Manger at the REC, Good Energy will, as well as their Sandbox trial under the BSC, apply for a derogation under the REC. This derogation application will progress independently. However the Code Manager has asked we include one question here to help with their assessment of the REC derogation.

1. REC schedule 14 lays out Supplier responsibilities with regard to the appointment of the Metering Equipment Managers (MEMs). This includes the appointment of the same MEM where the Metering Asset is used for the measurement of both import and export, in accordance with the BSC.

Please could you provide any reason and evidence why a derogation against this obligation in the REC should/should not be granted alongside the Sandbox Trial being carried out under the BSC?