

# CP Assessment Report

## CP1536 'Use of DTC data flow D0379 for submission of unmetered Half Hourly data'

**ELEXON**



### Committee

Supplier Volume Allocation Group (SVG)

### Recommendation

Approve

### Implementation Date

25 February 2021 as part of the scheduled February 2021 BSC Release.



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## About This Document

This document is the Change Proposal (CP) Assessment Report for CP1536 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 6 October 2020. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1536.

There are four 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 contains the CP Proposal Form.
- Attachment B contains the proposed redlined changes to deliver the CP solution.
- Attachment C contains the full responses received to the CP Consultation.

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## Why change?

[BSCP520 'Unmetered Supplies Registered in SMRS'](#) permits the use of 'Electronic or other agreed method' for the sending of unmetered Half Hourly (HH) data from Meter Administrators (MAs) to Half Hourly Data Collectors (HHDCs) via the [Data Transfer Catalogue \(DTC\) D0003 data flow 'Half Hourly Advances'](#). However, MAs are not currently able to send D0003 flows across the Data Transfer Network (DTN) to send unmetered HH data, as 'MA' is not specified as a 'Data Transfer Participant' in [Annex A of the DTC](#).

As a result, MAs currently send the unmetered HH data to HHDC via email. In practice, this means there are numerous attachments to the emails, some of which may be missed by the HHDC, resulting in important information being lost. Therefore the use of email for the exchange of this data does not provide a robust audit trail nor is it the most efficient method for the exchange of unmetered HH data between MAs to HHDCs.

ELEXON has raised this CP, and [DTC CP3578 'Use of DTC data flow for submission of unmetered half hourly data by the Meter Administrator to the Half Hourly Data Collector'](#), following the recommendation from the [Unmetered Supplies User Group \(UMSUG\) \(UMSUG125/02D\)](#). DTC CP3578 was presented to the MRASCo Development Board (MDB) on 30 July 2020. The MDB agreed to issue DTC CP3578 for a 30 Working Day Industry Impact Assessment. At its meeting on [24 September 2020](#) the MDB approved DTC CP3578.

## Solution

The proposed CP1536 solution will amend BSCP520 to allow MAs to send unmetered HH data across the DTN using the existing DTC data flow [D0379 – Half Hourly Advances UTC](#). The reference to the use of the D0003 for sending this information will also be removed, as the D0003 would be more complex for MAs and HHDCs to use. Allowing the option to use the D0379 to send the data from the MA to the HHDC, in addition to the option of using email, offers the least change as it will not place any new obligations on the MAs to use the D0379 to send data, unless it wants to, nor does it amend the substance of the data being sent.

The proposed solution under the DTC CP is to allow MAs to send the D0379 over the DTN by adding 'MA' as a Data Transfer Participant and to add them as a new sender for the D0379 to HHDC.

## Impacts and costs

The central implementation cost for ELEXON to make the required documentation changes will be approximately £240.

HHDCs will be impacted by this CP, as they will need to change their systems to receive and process unmetered HH data sent from the MAs across the DTN in the D0379.

MAs wishing to use the D0379 for the transfer of unmetered HH data will need to amend their systems and processes accordingly.



### What are Data Transfer Catalogue flows?

DTC flows are sent between Market Participants over the Data Transfer Network. The DTC accommodates the inter-operational exchange of information enabling effective interface between industry participants in the electricity supply market.

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## Implementation

The proposed Implementation Date for this CP is **25 February 2021** as part of the scheduled February 2021 BSC Release. This will allow this CP and DTC CP3578 to be implemented on the same date to deliver an end-to-end solution for Market Participants.

## 2 Why Change?

### What is the issue?

[BSCP520 'Unmetered Supplies Registered in SMRS'](#) permits the use of 'Electronic or other agreed method' for the sending of unmetered HH data from MAs to HHDCs. It lists the D0003 DTC data flow as a valid flow, but the D0003 is not permitted to be sent by MAs to HHDCs under the DTC. In practice the data is sent via email. However, this can give rise to the following issues:

- The current practice of sending and receiving daily emails containing numerous attachments can result in information being lost, resulting in errors in both Settlement data and customer bills;
- The introduction of [Market-wide Half Hourly Settlement \(MHHS\)](#) would mean the number of unmetered Metering System Identifier (MSID) trading on a HH basis is expected to increase during the transition period where data is still provided to the HHDC via the MA role. The anticipated increase, in time for MHHS, would be from c.350 to c.15,000 MSIDs. The current data exchange method of solely using email to submit the data would not be sufficiently robust for such a large volume of data; and
- MAs and HHDCs are required under BSCP520 to maintain a full audit trail of all information sent/received. However, the current practice of sending daily emails containing numerous attachments means this is a significant resource requirement to maintain during the transition period for MHHS. In addition, if email attachments are missed by the HHDC, the audit trail will be incomplete.



#### What is Market-wide Half Hourly Settlement?

MHHS is part of Ofgem's electricity settlement reform programme (via a Significant Code Review) and seeks to introduce arrangements that ensure the benefits of smart meters can be delivered to enable a smart, flexible, energy system.



#### What is the MRA?

The Master Registration Agreement (MRA) is an Agreement that sets out the rules for the electricity Supplier registration process for the GB Market. It sets out the terms for the provision of Metering Point Administration Services (MPAS Registrations), and procedures for Change of Supplier for premise/ metering point.

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### Proposed solution

ELEXON has raised a corresponding DTC Change Proposal (DTC CP3578) to add 'MA' as a Data Transfer Participant and to introduce a new instance of the D0379 from MA to HHDC. No changes to the format or structure of the D0379 flow are proposed under DTC CP3578.

The D0379 dataflow is designed for sending elective HH consumption values from smart Meters. Allowing the option to use the D0379 to send the unmetered HH data from the MA to the HHDC, in addition to the option of using email, offers the least change as it will not place any new obligations on the MAs to use the new method to send data, unless it wants to, nor does it amend the substance of the data being sent. It is also consistent with the proposals emerging from the [Ofgem Market-wide Half Hourly settlement Significant Code Review \(SCR\)](#) for the transition period where data is still provided to the HHDC via the MA role.

The UMSUG considered using the D0003 and the [D0380 'Half Hourly Advances for Inclusion in Aggregated Supplier Matrix'](#) data flows for the sending of the information, which is currently sent as an email attachment, from the MA to the HHDC. Both were ultimately deemed unsuitable. There are complexities associated with using the D0003, as it is based on the Meter Serial Number, which is not recognised under UMS. The use of the D0380 was discounted as it's not consistent with the time standard used by the current dataflow sent from the MA to HHDC. Using the D0379 will allow MAs to send unmetered HH data by MSID in UTC time format.

The proposed solution would improve the audit trail for unmetered HH data by mitigating the risk that data may be lost by attachments to emails being missed.

### Proposer's rationale

By allowing the use of a DTC dataflow for the transfer of unmetered HH data between the MA and HHDC, this CP seeks to improve the robustness of the existing data transfer process and the accuracy of UMS by facilitating the sharing of more granular data. Therefore, sending the data over DTN will:

- Reduce data errors which could occur where a HHDC might not process all the file attachments emailed by a MA. These failures would result in Settlement data errors and customer billing errors;
- Facilitate the exchange of unmetered HH data for the expected increase in numbers of unmetered HH MSIDs. Due to a significant increase in the past ten years, HH customers now account for 70% of the unmetered energy volume. The introduction of MHHS would mean the number of unmetered MSIDs trading on a HH basis, during the transition period, is expected to increase from c.350 to c.15,000 MSIDs, which will require a more resilient data exchange during the transition period than the current method of email to the HHDC;
- Improve robustness: the DTN is a proven reliable and robust communications method;
- Provide stakeholders with a DTN view of the audit trail of flows sent/received;
- Enable automatic flow distribution and processing of files by the Meter Administrator and HHDC;

- As the existing data format only supports HH data to one decimal place the energy values for some smaller customers would always be rounded to zero. The data granularity of the energy value in the D0379 is to three decimal places which mean smaller UMS supplies can be processed accurately, which aligns with the Design Working Group requirements for MHHS.

## Proposed redlining

Attachment B contains the proposed changes to [BSCP520 'Unmetered Supplies Registered in SMRS'](#) to deliver this CP.

## 4 Impacts and Costs

### BSC Party & Party Agent impacts and costs

All seven respondents to the CP1536 consultation stated they would be impacted as a result of delivering the CP1536 solution. They reported their systems would need to be modified to create and receive files in the D0379 format as opposed to the existing format. They all also stated they would incur one-off costs as a result of the modifications to their systems i.e. for development, testing, operational procedure work. Six respondents indicated the changes would be straightforward to implement but gave no indication of cost.

| BSC Party & Party Agent Impacts |  |
|---------------------------------|--|
| BSC Party/Party Agent           | Impact   |
| MA and HHDC                     | HHDC will be impacted as they will need to change their systems to be able to receive and process unmetered HH data sent from MA across the DTN in the D0379 format.<br><br>MA wishing to use the D0379 for the transfer of unmetered HH data will be required to amend their systems and processes accordingly. |

### Central impacts and costs

#### Central impacts

CP1536 will require changes to BSCP520. No BSC System changes are required for this CP.

| Central Impacts   |  |
|---|--|
| Document Impacts  | System Impacts                                       |
| <ul style="list-style-type: none"><li>BSCP520</li></ul> | <ul style="list-style-type: none"><li>None</li></ul> |

#### Impact on Core Industry Documents.

ELEXON has raised a corresponding DTC Change Proposal (DTC CP3578) to add 'MA' as a Data Transfer Participant and to introduce a new instance of the D0379 from MA to HHDC. No changes to the format or structure of the D0379 flow are proposed under the DTC CP3578.

#### Central costs

The central implementation cost for ELEXON to make the required documentation changes and implement the change will be approximately £240.

## 5 Implementation Approach

This CP is targeted for implementation on **25 February 2021** as part of the scheduled February 2021 BSC Release. This will align this CP to the MRA change Implementation Date to deliver an end-to-end solution for market participants.

Market Participants will be able to choose whether to amend systems and processes to this Implementation Date, at a later day, as DTC CP is allow the MAs to send data flows over the DTN and CP1536 will recognise this ability and allow the D0379 data flow to be used for the sending of UMS data; if this the method agreed between the MA and HHDC. .



## 6 Initial Committee Views

The CP1536 Progression Paper was presented to the SVG for information on 4 August 2020 ([SVG234/04](#)).

The SVG noted that:

- CP1536 has been raised; and
- the proposed progression timetable for CP1536.

### SVG's initial views

An SVG Member questioned whether the full potential benefits of the CP might not be realised as the CP is only giving the option to use the DTN to send the data and is not obligating its use. And whether this could cause problems for MAs opting to use email. The SVG Chair clarified that no party is required to use the DTN, but that they are required to agree the delivery method between themselves.

ELEXON noted one of the main benefits of using the D0379 is greater granularity of data. D0379 allows for data to be recorded to three decimal places which means smaller UMS can be processed accurately. The existing data format only supports data to one decimal place so the energy values for some smaller customers would always be rounded to zero. ELEXON added this would only be an issue if an MA takes on a significant number of smaller customers.

An SVG Member voiced support for the Change as it is a cross code change it will allow MAs to send data across the DTN.

An SVG Member questioned whether just adding the MA to the DTN and using the D003 was considered. ELEXON responded, that this was considered however D0379 was chosen as it allows for a greater granularity of data so it will stop the energy volumes for smaller customer being rounded to zero; as is currently the case.

ELEXON notes, as outline in section 3 of this report, the UMSUG considered using the D0003 but found that there are complexities associated with using the D0003, as it is based on the Meter Serial Number, which is not recognised under UMS. The use of the D0380 was discounted as it's not consistent with the time standard used by the current dataflow sent from the MA to HHDC. Using the D0379 will allow MAs to send unmetered HH data by MSID in UTC time format.

## 7 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

| Summary of CP1536 CP Consultation Responses                          |     |    |                           |       |
|--|-----|----|---------------------------|-------|
| Question   | Yes | No | Neutral/<br>No<br>Comment | Other |
| Do you agree with the CP1536 proposed solution?                      | 6   | 1  | 0                         | 0     |
| Do you agree that the draft redlining delivers the intent of CP1536? | 7   | 0  | 0                         | 0     |
| Will CP1536 impact your organisation?                                | 7   | 0  | 0                         | 0     |
| Will your organisation incur any costs in implementing CP1536?       | 7   | 0  | 0                         | 0     |
| Do you agree with the proposed implementation approach for CP1536?   | 5   | 2  | 0                         | 0     |
| Do you have any further comments on CP1536?                          | 0   | 7  | 0                         | 0     |

Seven Market Participants responded to the CP1536 consultation. All in the role of Supplier Agent with one additionally responding also as a Supplier.

Six of the respondents agreed with proposed solution. After voicing support for the proposed solution a respondent stated the use of the D0379 may provide difficulties for HHDCs that do not currently process Supplier Serviced Half-hourly data through their internal systems. They added this may result in the need to make a system change to receive a new dataflow and store data within that flow to the required level of precision. They feel that the use of the D0003 sent via the DTN Gateway, where possible, would be a better fit for the change based on two reasons. First, the D0003 holds consumption data at the level of precision required for the D0036. Second, they stated HHDCs in receipt of unmetered data but not Supplier Serviced data would not need to amend their systems to accept a new flow. However, they recognised should the D0003, currently used in protocol testing, be excluded as an appropriate option. The D0379 would then allow the MA access to the DTN which is preferable to the current manual process. It was also identified that the D0380, rather than the D0036 should be used to pass data to the required precision between the HHDC and HHDA.

Another respondent who supported the proposed solution noted it would not be practical to track missing D0379s if MA were mixing the use of both emails and the DTN to send the UMS data without notifying the HHDC. On a follow up call with the respondent ELEXON explained the reason for specifically stating that emails would still be allowed was because historically not all MAs used the DTN; however, through follow up calls during the CP1536 consultation we understand they are all now able to send data across the DTN. ELEXON noted the DTC CP is to allow the MAs to send data flows over the DTN and CP1536 will recognise this ability and allow the D0379 data flow to be used for the sending of UMS data; if this is the method agreed between the MA and HHDC.

One respondent, responding in the relevant roles of Supplier and HHDC, did not agree with the proposed solution. They believed the current arrangement of using email to send the required data is sufficient. They added further work would be required to update their systems and processes to allow them to receive the data using the DTN. During engagement following their consultation response they revealed that they would be able to receive the data in the D0379 format via email. They noted they are currently in the process of migrating their UMS portfolio over to a new system and are yet to determine whether it will be able to handle the use of the D0379 dataflow. We note that CP1536 will recognise the ability of MAs to use DTN to send UMS data using the D0379 data flow.

### Views on Implementation Date

Five respondents agreed with the implementation approach proposed for CP1536. The two other respondents stated they would prefer a June 2021 Implementation Date. One respondent stated this was due to resource commitment to other industry changes and uncertainty surrounding the level of resource that will be required to service their audit obligations in January 2021. The second respondent reported they foresaw challenges in meeting February 2021 Implementation Date given the testing that would be required to ensure the HHDC can receive the flow correctly from the MA. They noted that the implementation of CP1536 in February 2021 would coincide with the changes being implemented around the [D0268 Half Hourly Meter Technical Details](#). However, they said they would conform to a February release date if this was imposed. In the follow up call they added, there may be a need to make the related DTC change in June rather than February.

ELEXON noted that the DTC CP will allow the D0379 to be sent by e-mail, if agreed and manual processes can be used to input the data until the HHDC makes the required changes.

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## 8 Recommendations

We invite the **SVG** to:

- **APPROVE** the proposed changes to BSCP520 for CP1536; and
- **APPROVE** CP1536 for implementation on **25 February 2021** as part of the scheduled February 2021 BSC Release

## Appendix 1: Glossary & References

### Acronyms

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

| Acronyms |   |
|----------|---|
| Acronym  | Definition                              |
| BSCP     | Balancing and Settlement Code Procedure |
| CP       | Change Proposal                         |
| CPC      | Change Proposal Circular                |
| CT       | Current Transformer                     |
| DTC      | Data Transfer Catalogue                 |
| DTN      | Data Transfer Network                   |
| DWG      | Design Working Group                    |
| HH       | Half Hourly                             |
| HHDC     | Half Hourly Data Collector              |
| MA       | Meter Administrators                    |
| MHHS     | Market-wide Half Hourly Settlement      |
| MRA      | Master Registration Agreement           |
| MSID     | Metering System Identifier              |
| MTD      | Meter Technical Detail                  |
| SCR      | Significant Code Review                 |
| SVA      | Supplier Volume Allocation              |
| SVG      | Supplier Volume Allocation Group        |
| TOM      | Target Operating Model                  |
| UMSDS    | Unmetered Supplies Data Service         |

### DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

| DTC Data Flows and Data Items |  |
|-------------------------------|--|
| Number                        | Name   |
| DTC003                        | Half Hourly Advances   |
| DTC0379                       | Half Hourly Advances UTC   |
| DTC0380                       | Half Hourly Advances for Inclusion in Aggregated Supplier Matrix |

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## 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   |
| 2,3,5          | ELEXON webpage for BSCP520 'Unmetered Supplies Registered in SMRS' | <a href="https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/">https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/</a>   |
| 2              | Webpage for D0379 – Half Hourly Advances UTC                       | <a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0379&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0379&amp;FlowVers=1&amp;searchMockFlows=False</a>   |
| 2              | Mrasco webpage for Annex A of the DTC.                             | <a href="https://dtc.mrasco.com/release/dtc%2012.1/Worddocs/Annex%20A.doc">https://dtc.mrasco.com/release/dtc%2012.1/Worddocs/Annex%20A.doc</a>   |
| 3              | Ofgem's webpage for Market-wide Half Hourly Settlement             | <a href="https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/electricity-settlement-reform">https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/electricity-settlement-reform</a> |
| 4              | Ofgem's webpage for the Significant Code Review (SCR)              | <a href="https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/electricity-settlement-reform">https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/electricity-settlement-reform</a> |