

CP Progression Paper

CP1524 'Improving the communication methods in the fault rectification process'

ELEXON



Committees

Imbalance Settlement Group (ISG)
Performance Assurance Board (PAB)
Supplier Volume Allocation Group (SVG)



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About This Document

This document provides information on new Change Proposal (CP) CP1524 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch on 13 January 2020.

We are presenting this paper to the PAB on 19 December 2019, and the ISG and SVG on 7 January 2020 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1524 Proposal Form.
- Attachment B contains the proposed redlined changes to deliver the CP1524 solution.

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1 Why Change?

What is the fault rectification process?

The fault rectification process is used where a fault is identified with Metering Equipment that prevents accurate Metered data being entered into Settlement. Faults are usually identified by the Data Collector or Supplier, who then raise the fault with the Meter Operator Agent (MOA) to investigate and resolve.

As the agent assigned to a Metering System, the MOA has overall responsibility for maintaining the Metering Equipment. However, in some instances, it may require support or additional information from the Supplier or Licensed Distribution System Operator (LDSO), particularly where faults occur on Metering Equipment owned by the LDSO.

Ensuring that identified faults are resolved efficiently and in a timely manner is essential to making sure that only accurate metered data is used in the Settlement calculations.

The Fault Investigation Review Group

Following a [Technical Assurance of Performance Assurance Parties audit conducted by ELEXON in 2013](#), it was found that the fault investigation process described in the BSC documentation was not enabling the effective resolution of identified faults and could be improved to be more efficient. The report found that:

- the timescales for fixing faults were unclear; and
- insufficient guidance was provided on which party involved in the faults process was responsible for each step.

Following the audit finding, a group of industry experts came together as the Fault Investigation Review Group (FIRG) to review the faults process and propose changes. The FIRG met throughout 2015 and produced a list of recommendations for improvements to the faults process. However, at the time, due to the amount of ongoing change (particularly the large scale Commissioning changes under [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#) that used much of the same resource) these recommendations were not immediately progressed.

Issue 73

[Issue 73 'Review of fault management and resolution timescales'](#) was raised by SSE on 12 October 2018.

The Issue Group was established to review the recommendations of the FIRG, and determine whether any amendments should be made to the proposed solutions to ensure that changes were still reflective of best practice. The Issue Group also considered when the LDSO should take responsibility for resolving faults to ensure the responsibilities were clear for all involved. The Issue Group recommended three CPs to progress changes to the fault rectification process. This CP seeks to implement changes to the way Metering Equipment fault updates are communicated.

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What is the issue?

The process of sending of the [D0005 'Instruction on Action' Data Flow](#) to provide an update on the fault status is not well defined. BSCP514 prescribes:

- an initial D0005 being sent by the MOA to the Half Hourly Data Collector or Supplier (depending on who raised the fault) 5WD after the fault was raised to provide an update on the resolution of the fault.
- If the fault remains unresolved, a second D0005 is sent by the MOA 10WD later to provide a further update.
- Following this, the MOA is required to update the Half Hourly Data Collector (or Supplier) of the status of the fault 'as appropriate' and on a 'regular basis'. These timescales are not defined in the BSCPs and so it is unclear how often an update should be given after the initial 15WD. Furthermore, the audit finding noted that in some cases responses were being sent inappropriately and as a means to meet the 15WD requirement.

Where multiple faults are identified and multiple [D0001 'Request Metering System Investigation'](#) flows are raised on a single Metering System, the sending of a [D0002 'Fault Resolution Report or Request for Decision on Further Action'](#) to close a fault can create confusion as to which fault has been rectified. Many MOAs have informed ELEXON that some systems will close the oldest open fault on a site and some will close the latest by default. This requires some manual intervention to ensure the right fault is closed, and can lead to new D0001s needing to be raised, which starts the defined timescales again.

Proposed solution

Communication flows

The Issue Group recommended that a new suite of flows is created to be used in the rectification of faults on Half Hourly Metering Systems, replacing the D0001, D0002 and D0005 for Half Hourly faults.

The solution will allow greater flexibility around when updates are provided on the status of open faults. The intent is that this would encourage meaningful updates to be provided rather than updates to meet BSC timescales as found in the audit process. With each update, the MOA should advise the Half Hourly Data Collector (or Supplier) when it expects to provide its next update on the fault. To ensure that this does not unnecessarily extend the time that faults are left open, the Supplier will be able to challenge the Expected Action Date if it thinks action should be taken sooner than proposed by the MOA. This will create a cycle for updates to be provided over the lifetime of the fault.

[CP1526 'Introduction of Service Level Agreements for rectifying fault on Metering Equipment'](#) seeks to review the service levels associated with fault rectification to ensure they are both realistic and robust.

The new flows will be created for the existing Half Hourly market, and the process for rectifying faults on Non Half Hourly Metering Equipment will not change as a result of CP1524. However The Issue Group recommended that the process be supportive of Advanced Meters. To support this, a footnote will be added to the Non Half Hourly fault rectification process to highlight that the new process may be used for Non Half Hourly Advanced Meters, with agreement of all involved parties.

The Issue Group noted that, in many cases, fault rectification flows for Non Half Hourly Metering System Identifiers are used as job booking flows to confirm site visit details with the MOA rather than a request to investigate. As such the additional complexity of the CP1524 solution was not required.

Identifiers

The introduction of a Unique Fault Reference, will improve the end to end tracking of faults. The Unique Fault Reference will be added to the new suite of data flows and will provide a consistent reference over the lifetime of the fault. This will ensure that where multiple faults are raised on the same Half Hourly Metering System, the correct fault is closed when resolved. As the Unique Fault Reference will take the form of a field in the proposed new data flows, this will be implemented through associated Data Transfer Catalogue Change Proposals.

Fault Category

A categorisation of the type of fault will also be created. This categorisation will be based on the type of Metering Equipment that is faulty and the different variations of fault that can occur on these types of Metering Equipment. This will allow parties to better direct faults at an earlier stage in the investigation process, which should ultimately lead to a more timely rectification of faults.

The categorisation of faults will also make root cause analysis easier when identifying the most common types of faults occurring in the industry as well as the average time it takes to rectify different types of fault.

Change of Agent or Supplier

In addition to clarifying and improving the communication methods used in the fault rectification process, this CP will add clarification to the prescribed Change of Agent and Change of Supplier processes to ensure that the relevant parties are aware of any open faults when the Supplier or appointed agent changes. The conventions will follow other information that is passed between participants on Change of Supplier or agent such that:

- On a change of MOA, the Supplier will inform the new MOA of any open faults;
- On a change of Half Hourly Data Collector, the MOA will inform the incoming Half Hourly Data Collector of any open faults when it sends the Meter Technical Details;
- On a concurrent change of Supplier and agent, the outgoing MOA will pass details of open faults to the incoming MOA, who will then inform the incoming Supplier and Half Hourly Data Collector as necessary.

This will ensure that even where involved parties change while a fault is being investigated, there will remain a consistent narrative over the lifetime of the fault to better facilitate the efficient rectification of faults on Metering Equipment.

Proposer's rationale

This change will improve communications between Parties and Party Agents by removing the duplication of D0001 flows being sent to raise a fault that has been incorrectly closed, and creating bespoke flows for interparty communications in the fault resolution process. This will enable updates to be more clearly transferred between Parties and Party Agents in relation to fault investigations. The changes proposed will address the issues raised by the BSC Auditor from 2010-12 and will address points raised during the Technical Assurance check in 2013, and implement the recommendations of the Issue 73 Workgroup.

Proposed redlining

CPXXXX will require amendments to:

- [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#);
- [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#);
- [BSCP537 Appendix 1 'Self Assessment Document \(SAD\)'](#); and
- [BSCP537 Appendix 2 'Testing Requirements'](#).

Redlined changes to these documents can be found in Attachment B.

Please note: As we are proposing three new data flows, in order to reduce confusion in the draft redlining they are referred to as DAXYX, DAXYY and DAXYZ. The actual numbering of the data flows will be assigned by the MRA Service Company (MRASCo)

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approximately 2 months before the Implementation Date and will follow the standard 'DXXXX' format (e.g. D0170 or D0215) format. DAXYX, DAXYY and DAXYZ are used as placeholders in the BSC Configurable Items to allow the ISG, PAB and the SVG to approve it before the actual flow numbers are available. The version of these BSC Configurable Items that become effective on the Implementation Date will contain the actual flow numbers.

3 Impacts and Costs

Central impacts and costs

Central impacts

| Central Impacts | |
|--|--|
| Document Impacts | System Impacts |
| <ul style="list-style-type: none">• BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'• BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'• BSCP537 Appendix 1 'Self Assessment Document (SAD)'• BSCP537 Appendix 2 'Testing Requirements' | <ul style="list-style-type: none">• None |

In addition to CP1524 a Data Transfer Catalogue Change Proposal will be required to implement the new flows to facilitate the solution. These Data Transfer Catalogue changes will also be needed to support [CP1525 'Improving the involvement of the LDSO in the fault resolution process'](#).

Impact on BSC Settlement Risks

| Impact on BSC Settlement Risks |
|---|
| CP1524 will impact on Settlement Risk 005 'A fault with SVA Metering Equipment is not resolved, such that metered data is recorded incorrectly or cannot be retrieved'. |
| The Proposed changes will improve the efficiency and effectiveness of the fault rectification process, which in turn will help mitigate this risk. |

Central costs

The central implementation costs for CP1524 will be approximately £2280 to implement the necessary document changes and update relevant guidance documents.

BSC Party & Party Agent impacts and costs

CP1524 will impact parties involved in the Half Hourly fault resolution process by implementing a new suite of flows to provide updates and clarifying responsibilities of those involved in the process.

| BSC Party & Party Agent Impacts | |
|---------------------------------|---|
| BSC Party/Party Agent | Impact |
| Suppliers | CP1524 will amend the way parties provide updates on the rectification of faults with Metering Equipment. |
| Half Hourly MOAs | |
| Half Hourly Data Collectors | |



CP1525

CP1525 is one of the three CPs recommended by the Issue 73 Group. It seeks to enhance the involvement of LDSOs in the fault rectification process by clarifying responsibilities for rectifying faults on LDSO owned Metering Equipment and providing a formal method for faults to be raised with the LDSO.

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4 Implementation Approach

Recommended Implementation Date

The recommended Implementation Date for CP1524 is **25 June 2021** as part of the June 2021 BSC Release. This Implementation Date will allow sufficient time for the associated Data transfer Catalogue CP and new data flows to be fully developed and implemented. This will also align with the recommended Implementation dates for CP1525 and CP1526.

5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1524:

| Progression Timetable | |
|---|--------------------------------------|
| Event | Date |
| CP Progression Paper presented to PAB for information | 19 December 2019 |
| CP Progression Paper presented to ISG and SVG for information | 7 January 2020 |
| CP Consultation | 13 January 2020 – 7 February 2020 |
| CP Assessment Report presented to PAB for decision | 27 January 2019 |
| CP Assessment Report presented to ISG for decision | 3 March 2020 |
| CP Assessment Report presented to SVG for decision | 3 March 2020 |
| Proposed Implementation Date | 25 June 2021 (June 2021 BSC Release) |

CP Consultation questions

In addition to the standard CP Consultation questions for CP1524, we intend to ask additional questions as outlined below.

| Standard CP Consultation Questions |
|--|
| Do you agree with the CP1524 proposed solution? |
| Do you agree that the draft redlining delivers the CP1524 proposed solution? |
| Will CP1524 impact your organisation? |
| Will your organisation incur any costs in implementing CP1524? |
| Do you agree with the proposed implementation approach for CP1524? |

| Additional CP Consultation Questions |
|--|
| Do you agree that the proposal for how faults should be passed on in the event of a change of Agent or Supplier is the optimal solution? |

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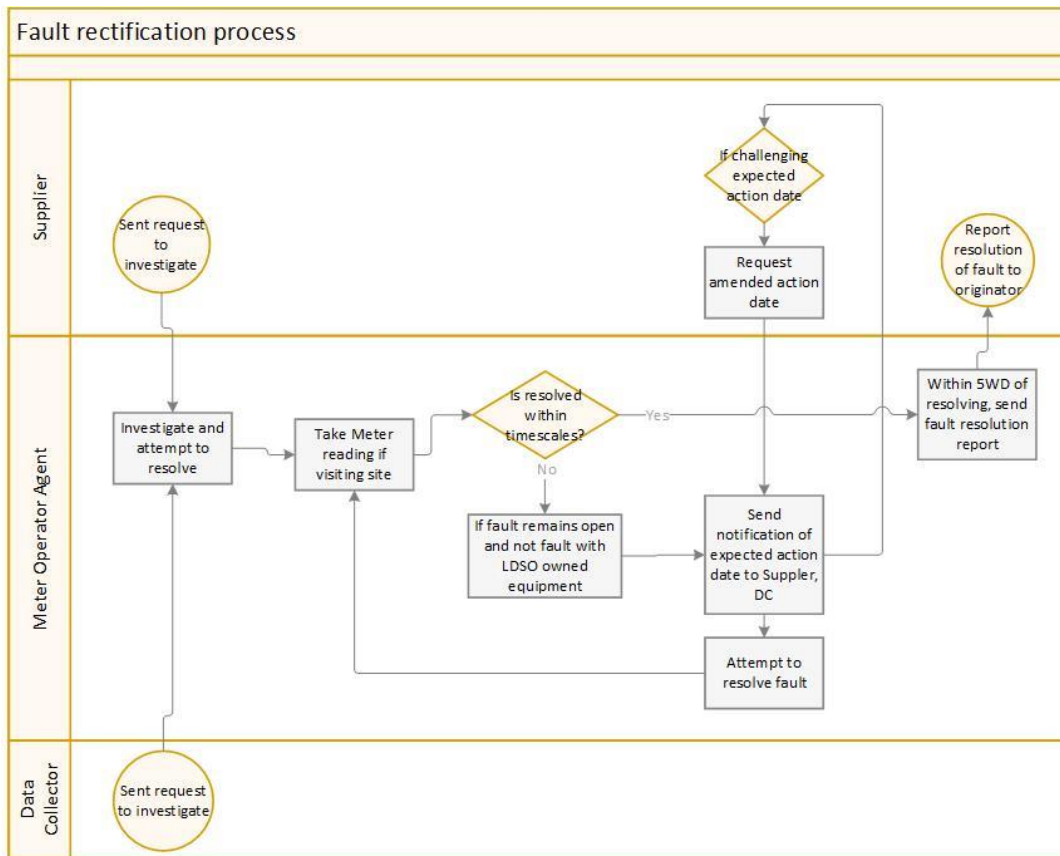
6 Recommendations

We invite the ISG, SVG, and the PAB to:

- **NOTE** that CP1524 has been raised;
- **NOTE** the proposed progression timetable for CP1524;
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation; and
- **NOTE** that CP1524 will be presented to:
 - the PAB on 19 December 2019;
 - the ISG in 7 January 2020; and
 - the SVG on 7 January 2020.

Appendix 1: Process diagram

The below process diagram provides an overview of the proposed process to improve communications by the Meter Operator Agent in the rectification of faults on Metering Equipment.



Appendix 2: Glossary & References

Acronyms

| Acronyms | |
|----------|---|
| Acronym | Definition |
| BSCP | Balancing and Settlement Code Procedure |
| CP | Change Proposal |
| CPC | Change Proposal Circular |
| LDSO | Licensed Distribution System Operator |
| MOA | Meter Operator Agent |
| ISG | Imbalance Settlement Group (<i>Panel Committee</i>) |
| PAB | Performance Assurance Board (<i>Panel Committee</i>) |
| SVG | Supplier Volume Allocation Group (<i>Panel Committee</i>) |

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 |
| D0001 | Request Metering System Investigation |
| D0002 | Fault Resolution Report or Request for Decision on Further Action |
| D0005 | Instruction on Action |
| D[AXYX] | Request Metering System Investigation |
| D[AXYY] | Fault Resolution Report |
| D[AXYZ] | Fault Rectification Communication |

External links

A summary of all hyperlinks used in this document are listed in the table below.

| External Links | | |
|----------------|-------------------|---|
| Page(s) | Description | URL |
| 2 | 2013 Audit Report | https://www.elexon.co.uk/wp-content/uploads/2012/03/Fault-Investigation-Process-Findings-TAPAP-Report-May-2013-v1-02.pdf |
| 2 | P283 | https://www.elexon.co.uk/mod-proposal/p283 |
| 2 | Issue 73 | https://www.elexon.co.uk/smg-issue/issue-73/ |
| 4 | BSCPs | https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps |
| 4 | CP1526 | https://www.elexon.co.uk/change-proposal/cp1526 |
| 7 | CP2525 | https://www.elexon.co.uk/change-proposal/cp1525 |

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