Final CP Report

CP1525 'Improving the involvement of the LDSO in the fault resolution process'

Committee

Supplier Volume Allocation Group (SVG)

Decision

Reject

Implementation Date

N/A

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About This Document

This document is the CP1525 Final Change Proposal (CP) Report which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to reject CP1525.

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 views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the rejected redlined changes to deliver the CP1525 solution.
- Attachment B contains the full responses received to the CP Consultation.
- Attachment C contains the CP1525 Proposal Form

1 Summary

What is the issue?

The Half Hourly fault rectification process is not clear on which party is responsible for resolving faults on Metering Equipment owned by a Licensed Distribution System Operator (LDSO). Further, BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' does not provide clear guidance on how the support of LDSOs should be requested or provide any timescales for addressing faults on LDSO owned Metering Equipment. This can cause challenges for Meter Operator Agents (MOAs) and lead to the delay of faults being rectified.

Solution

CP1525 aims to formalise the process by which faults on Metering Equipment owned by the LDSO will be addressed. It will make clear that where a fault is found on LDSO owned Metering Equipment, it is the responsibility of that equipment owner to rectify. To facilitate this, CP1525 will define a process for raising identified faults with the LDSO.

Impacts and costs

CP1525 will impact **LDSOs** as it will clarify that they are responsible for resolving faults that occur on Metering Equipment which it owns.

CP1525 will also impact **Suppliers, MOAs** and **Data Collectors** as the other parties involved in the Half Hourly fault rectification process.

Decision

The SVG and ELEXON believed that the CP1525 solution could be enhanced, and the clarity provided to industry increased, by including an explicit obligation on the BSC for LDSOs to rectify faults that occur on Metering Equipment which they own. The SVG has **rejected** CP1525, noting that the solution will be carried forwards through a new BSC Modification.

2 Why Change?

What is the issue?

The Half Hourly fault rectification process is not clear on the responsibility of parties involved. Further, the associated timescales for engaging the support of Licensed Distribution System Operators (LDSOs), where needed, are not well defined. BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' is not clear on who is responsible for addressing faults found on Metering Equipment owned by an LDSO.

This can cause challenges and delays to resolving faults, as the Meter Operator Agent (MOA) may struggle to obtain access to equipment owned by LDSO, meaning the fault cannot be resolved in a timely manner, which poses a risk to Settlement. As the Metering Equipment owner, the LDSO is best placed to investigate and resolve faults on Metering Equipment which it owns.

Background

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 Half Hourly Data Collector or Supplier, who raise the fault with the MOA to investigate and resolve.

As the Party 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 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 Suppliers can achieve their Meter read targets so that only accurate metered data is used in the Settlement Calculations.

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 Fault Investigation Review Group, 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 process was clear for all involved. The Issue Group recommended three CPs (including this CP1525) to progress changes to the Half Hourly fault rectification process. This CP seeks to implement changes to the involvement of LDSOs in the fault rectification process. The two other CPs are:

- CP1524 'Improving the communication methods in the fault rectification process'; and
- CP1526 'Introduction of Service Level Agreements for rectifying Meter faults.

While the maximum benefit will be obtained from all three CPs together, the Issue Group believed that this CP1525 would bring benefit by improving the accountability of LDSOs in the Half Hourly fault rectification process. CP1524 and CP1526 have been rejected.

CP1524

CP1524 is one of the three CPs recommended by the Issue 73 Group. It sought to improve the way updates are communicated in the fault rectification process to ensure that relevant parties are kept informed, allowing faults to be resolved in a more timely and efficient manner.

CP1526

CP1526 is one of the three CPs recommended by the Issue 73 Group. It sought to review the service levels for Meter Operators and LDSOs when taking action to rectify faults on Metering Equipment.

Fault Investigation Review Group

The Fault Investigation Review Group met throughout 2015 to review the fault rectification process and propose changes. Due to the large-scale changes to Commissioning, that used much of the same resource, the proposals were not immediately progressed.

3 Solution

Rejected solution

Rectification process

CP1525 aimed to clarify that, where a fault is found on Metering Equipment owned by the LDSO, that LDSO will be responsible for rectifying the fault. This approach is consistent with the approach to Commissioning introduced by P283 'Reinforcing the Commissioning of Metering Equipment Processes', which placed the responsibility for the Commissioning of Metering Equipment owned by the LDSO on the Metering Equipment owner.

To support the enhanced involvement of LDSOs in the Half Hourly fault rectification process, a new process would be introduced to describe how faults will be raised to the LDSO and how the LDSO will provide progress updates to interested parties.

Where a MOA identifies a fault with LDSO-owned Metering Equipment as part of its investigation of a Half Hourly fault, it would escalate to the Supplier who has a relationship with the LDSO. The Supplier would subsequently raise the fault with the LDSO. The fault would remain open in the MOA's systems until resolved. However, the MOA would have no responsibility to resolve the fault and no non-compliances would be raised against the MOA while the LDSO undertakes its investigation. Once the LDSO had resolved the problem, the fault would be passed back to the MOA, who will confirm that the fault is resolved and send a resolution flow to the Supplier to close the fault.

Communication flows

To support the new process proposed by CP1525, a new data flow would be implemented in the Data Transfer Catalogue. This flow would mirror those required by the CP1524 'Improving the communication methods in the fault rectification process' solution. The new flow would be used by the MOA and Supplier to raise a fault with the LDSO. The LDSO would use the flow to provide updates on the resolution of the fault, and to notify when it has addressed the issue. The sending of the new flow would not follow rigid timescales. Instead, when an update is provided, the LDSO will also advise when it expects to send a subsequent update (where the fault is not resolved).

Change of Agent or Supplier

In addition to clarifying and improving the communication methods used in the fault rectification process, this CP would add clarity to the Change of Agent and Change of Supplier processes to ensure relevant parties are aware of any open faults when the Supplier or appointed Party Agent changes. The conventions would follow other information (such as Meter Technical Details) that is passed between participants on Change of Supplier or Agent such that:

- If there are faults open with the LDSO, on a concurrent change of Supplier and MOA, the New Supplier will inform the LDSO who the new MOA is so that they can respond appropriately.

Proposer's rationale

Faults that remain unresolved can potentially lead to an increased level of estimated (and potentially inaccurate) data entering Settlement. By ensuring that LDSOs take an active, accountable role in rectifying faults on Metering Equipment, the proposed processes would ensure that the BSC enables efficient rectification of faults.

The changes proposed would address the issues raised by the BSC Auditor and will address points raised during the 2013 Technical Assurance of Performance Assurance Parties (TAPAP) check, and implement the recommendations of the Issue 73 Workgroup.

Rejected redlining

CP1525 would 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';
- BSCP515 'Licensed Distribution'

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

4 Impacts and Costs

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	System Impacts
• BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' • BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' • BSCP515 'Licensed Distribution'	• None

In addition to CP1525, a Data Transfer Catalogue Change Proposal would be required to implement the new flows to facilitate the solution.

Impact on BSC Settlement Risks
CP1525 would 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 would 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 CP1525 will be approximately £2760 to implement the necessary document changes, amend internal processes, and update the relevant guidance documents.

BSC Party & Party Agent impacts and costs

CP1525 will impact parties involved in the Half Hourly fault resolution process by implementing a new suite of data flows to provide updates and clarifying responsibilities of those involved in the process.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	CP1525 will amend the way parties provide updates on the rectification of faults with Metering Equipment.
Half Hourly MOAs	
Half Hourly Data Collectors	
LDSOs	

All 16 consultation respondent identified impacts they would incur as a result of CP1525. These impacts largely related to implementing changes to working practices and systems to support the proposed changes. Some respondents commented that the required changes would be relatively minor to ensure their training processes were up to date;

others commented that they would require significant system changes to process the new data flows

Some respondents noted positive impacts that included the increased visibility of faults data they would receive following the change.

Participant costs

Of the respondents that identified impacts arising from CP1525, 13 commented that they would incur costs as a result of CP1525. These costs ranged from being described as medium to significant. Of those who provided approximate figures, these were in the region of £80,000-£100,000. The majority of respondents that identified costs, specified that these would be one off costs. Most respondents that identified costs commented that stated figures combined the costs of implementing CP1524, CP1525 and CP1526.

5 Implementation Approach

Rejected Implementation Date

The proposed Implementation Date for CP1525 was **24 June 2021** as part of the June 2021 BSC Release. This Implementation Date would allow sufficient time for the associated Data Transfer Catalogue CP and new data flows to be fully developed and implemented, and align with the implementation of CP1524.

The majority of consultation respondents agreed with the proposed implementation approach for CP1524, agreeing that the lead time was sufficient for industry participants to prepare their processes and systems for the change. More detail on respondents views on implementation can be found in Section 7.

6 Initial Committee Views

SVG's initial views

The SVG considered CP1525 at its meeting on 7 January 2020 (SVG227/05).

An SVG Member believed CP1525 would lead to cross Code conflicts with the Meter Operation Code of Practice Agreement (MOCOPA). They commented that the MOCOPA had a requirement for MOAs to inform LDSOs of faults, and considered that the proposed BSC requirement for MOAs to inform LDSOs via the Supplier could cause confusion.

Another SVG member commented that they agreed with the principle of CP1525 and believed that the rationale for improving accountability of LDSOs in the rectification of faults on Metering Equipment was justified.

Post SVG meeting update

ELEXON attended the MOCOPA Review Panel on 13 February 2020 to discuss whether the proposed changes would introduce irregularities or confusion. The MOCOPA Panel agreed with ELEXON that the implementation of CP1525 would not create a confliction between the BSC and the MOCOPA. It did however note the potential overlap and agreed to work with ELEXON to minimise any risk of confusion or duplication of effort by market participants.

What is the Meter Operation Code of Practice?

The Meter Operation Code of Practice Agreement is an Agreement between Distribution Businesses and Meter Operators. Parties enter into the Agreement to regulate their relationships regarding the safety, technical and business interface requirements surrounding the provision of meter operation services, and to assure compliance with the requirements of the Agreement.

7 Industry Views

We received 16 formal responses to the CP Consultation which are summarised below, and one email comment (not included in the below table). You can find the full responses in Attachment B.

Summary of CP1525 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1525 proposed solution?	11	5	0	0
Do you agree that the draft redlining delivers the intent of CP1525?	14	1	1	0
Will CP1525 impact your organisation?	16	0	0	0
Will your organisation incur any costs in implementing CP1525?	13	3	0	0
Do you agree with the proposed implementation approach for CP1525?	11	5	0	0
Do you have any further comments on CP1525?	5	11	0	0

Solution

11 respondents agreed with the solution proposed by CP1525. They commented that the formalised process for involving LDSOs in the fault rectification process would ensure consistency with how Suppliers and MOAs approached faults on LDSO owned Metering Equipment. Respondents also agreed that the increased transparency would benefit market participants.

The minority of respondents disagreed with the CP1525 solution, believing that it duplicated an existing process in the Distribution Connection Use of System Agreement. The respondent acknowledged that the BSC process was focussed on risks to Settlement rather than safety aspects covered in other industry processes, but believed that a combined process would be more effective than two distinct processes. ELEXON believes that while there are similarities with other industry processes, the solution does not create any conflictions, and notes that members of Issue 73 wanted to create a formalised BSC Process relating to fault rectification. ELEXON has agreed to work together with the MOCOPA Review Panel to ensure minimal duplication between differing industry processes where possible.

One respondent believed that by not extending the scope to include Non Half Hourly Meters, the solution would not realise the full benefit. They commented that their portfolio had many thousands of Non Half Hourly Meters that used measurement transformers. ELEXON notes that under the Licence condition for Meters with measurement transformers to be Advanced Meters, and the requirement for Advanced Meters to be settled Half Hourly, then this portfolio should significantly decrease before the implementation of CP1525.

Implementation

11 consultation respondents agreed with the proposed implementation approach for CP1525, agreeing that the lead time was sufficient for industry participants to prepare their processes and systems for the change. Other respondents who disagreed with the implementation approach gave varying reasons for their opinion. These included alignment with the Faster Switching Programme, which aims to be implemented in November 2021.

Additional response

In addition to the responses captured above, we received one email response from a network operator. They believed that:

- There should be a rejection process in place in the instance that we are not:
    - The correct I/DNO party to contact; or
    - Responsible for the issue
- There should be a contact provided at the Supplier/MOA and LDSO, so the issue can be discussed and hence resolved in a timely manner. This will be especially useful where we need to meet on site to undertake a joint investigation/testing element.

ELEXON believes that if a fault is incorrectly raised with the LDSO, it will be able to close the fault down (noting that it is not responsible) as it will not be able to take any rectification action. We also note that the proposed new data flows allow a greater quality of information to be passed between participants to support the timely rectification of faults. The value of having a specific contact will vary between organisations depending on internal processes and so this was not included as standard in the solution.

Comments on the proposed redlining

14 respondents agreed that the proposed redlining would deliver the CP1525 solution. One respondent disagreed and one did not provide a view. Some noted minor corrections and clarifications that should be made prior to approval.

Comments on the CP1525 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 3.4.3.A.3	Typo – resolve not resovle	We have corrected this.
BSCP502 3.4.3.A.4&5 BSCP514 5.4.2.4.A&B BSCP515 3.15.4&5	Refers to days rather than working days (WD). Presume should be WD? Repeated in 514 and 515.	We have corrected this.
BSCP502 3.4.3.A.6	There is reference to 5.4.2.3.B. This does not exist.	We have amended the reference to 3.4.3.A.5
BSCP502 3.4.3.A.6	If challenging Expected Action Date… Is "Expected Action Date" a	Yes, we have corrected this to read 'Expected Action Date'

Comments on the CP1525 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	defined term and is it the same thing as "expected resolution date" as referred to in 3.4.3.A.5? If so change one or the other for standard terminology. Repeated in 514 and 515.	
BSCP502 3.4.3.A.10	We believe the HH Data Collector should also be notified at this point	We have added the HH Data Collector as a recipient.
BSCP502 3.4.3.A.12	Once the fault is fixed, the actions refers you back to Go to 3.4.3.3this doesn't seem to be the appropriate ref.	This is the correct reference, it loops back into the MOA process for the MOA to confirm the fault is resolved and close down.
BSCP502 3.4.3.A.6 BSCP514 5.4.2.5 BSCP515 3.15.6	"If challenging Expected Action Date provided by HHMOA within 2WD of 5.4.2.3.B". The HHMOA will not have provided the Expected Action Date where the LDSO is responsible for the metering equipment. The reference to "5.4.2.3.B" is an invalid reference.	We have corrected this to read 'LDSO' and amended the reference.
BSCP502 3.4.3.A.10, BSCP514 5.4.2.9 BSCP515 3.15.10	Typo "Notify that the fault remains unresolved. And provide a revised expected resolution date." Remove full stop and amend to lower case "a".	We have corrected the grammar here.
BSCP515 3.15.12	"Go to 5.4.1.4.C". This is an invalid reference.	This step should be removed from the Distributor process; they are no longer involved.

8 SVG Views following industry consultation

SVG Views

CP1525 was presented to the SVG for decision at its meeting on 3 March 2020 (SVG229/03).

SVG members noted that respondents to the CP consultation had perceived that the proposed process had overlaps with other industry processes contained in the DCUSA and MOCoPA. ELEXON agreed that there were synergies between the processes, but emphasised that while the MOCoPA is primarily concerned with the safety of MOAs, the intent of the BSC process would be to protect the integrity of Settlement. ELEXON also noted that this concern had been discussed by the Issue 73 group, which believed a dedicated BSC process would be the most effective approach.

An SVG member expressed concern that, without an explicit Code obligation on LDSOs to resolve faults on Metering Equipment which they own, the clarity that CP1525 aims to deliver would not be realised. The SVG asked ELEXON to confirm whether the CP1525 solution would better address the defect with a corresponding amendment to the BSC itself.

The SVG noted that, when identifying impacts and costs, the majority of consultation respondents had combined the effects of CP1524, CP1525 and CP1526 in their responses. The SVG requested further detail on the industry impacts and costs incurred if CP1525 were to be approved independently. The SVG believed that without this it did not have sufficient information on which to make a fully informed decision.

SVG Decision

The SVG unanimously:

- **DEFERRED** its decision on CP1525 until its April meeting on 7 April 2020.

Post SVG meeting

Following the decision to defer its decision on CP1525, ELEXON considered the SVG's concern that placing obligations on LDSOs to investigate and resolve faults on Metering Equipment which it owns would not be reflective of the obligations contained in Section L 'Metering' of the BSC.

As the intent of CP1525 is to clarify responsibilities in the Half Hourly fault rectification process and ensure timely and effective resolution, the desired clarity would be enhanced by placing explicit obligations in the Code. Having a clear obligation for LDSOs to address faults on Metering Equipment for which it owns – in addition to prescribing a communication process in the relevant BSCPs – will maximise clarity regarding responsibility for all market participants.

We believe placing a clear obligation in Section L would further enhance the CP1525 solution and ensure that the Half Hourly fault rectification process operates effectively. It would also be clearer for market participants and ELEXON from an audit perspective.

As such, ELEXON recommends that CP1525 be rejected and the solution be progressed through a BSC Modification.

Solution amendment

Based on the feedback of the SVG and industry consultations, we propose further changes to the CP1525 solution to reduce the impact and implementation effort required in industry participants.

Mostly this will mean redrafting the new communication process to use the existing data flows currently used in the fault rectification process. Based on consultation responses, we anticipate this will reduce the development and testing requirements of industry participants ahead of implementation. It may be necessary to add some data items to the existing flows in order to facilitate a full solution, but we will endeavour to work within the existing framework.

As a consequence of using the existing data flows as opposed to the new bespoke suite proposed by Issue 73, it will be easier to make the solution useable by both the Half Hourly and Non Half Hourly segments of the market, as any required system changes should be more straightforward. We therefore propose to expand the scope of the solution to also apply to Non Half Hourly faults.

To ensure such Modification solution is complete and self-contained, we will also include the elements of CP1526 placed service level targets on the LDSO to complete any required action with 40 Working Days in 97% in cases

9 Final Committee Views and Decision

SVG's final views

CP1525 was presented to the SVG for decision at its meeting on 7 April 2020 (SVG230/01).

SVG members thanked ELEXON for its investigation and welcomed the proposal to raise a BSC Modification to enhance the solution proposed by CP1525. The SVG noted this would continue to deliver the benefits of CP1525, in a clearer and more effective manner.

An SVG Member questioned which flows would be used in the enhanced solution. ELEXON confirmed that it intended to draft processes using the D0001 'Request Metering System Investigation', D0002 'Fault Resolution Report or Request for Decision on Further Action' and D0005 'Instruction on Action' flows as these were the flows used in the existing fault rectification process. ELEXON also clarified that it had engaged with the MOCoPA Panel again over the SVGs concerns of duplicated effort. It reiterated the commitment to work together on the solution, and develop a join guidance note ahead of implementation to reduce the risk of duplication by market participants.

The SVG noted the intent to raise a new BSC Modification to deliver an enhanced solution, and rejected CP1525.

Final decision

The SVG has:

- **REJECTED** CP1525.

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
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
MOCOPA	Meter Operation Code of Practice Agreement
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group *(Panel Committee)*

DTC data flows and data items

Data Transfer Catalogue data flows and data items referenced in this document are listed.

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[AXYZ]	Fault Rectification Communication *(New flow being introduced)*

External links

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

External Links		
Page(s)	Description	URL
3	Issue 73 on the BSCCo Website	https://www.elexon.co.uk/smg-issue/issue-73/
3	CP1526 on BSCCo Website	https://www.elexon.co.uk/change-proposal/cp1526/
3, 4	CP1524 on BSCCo Website	https://www.elexon.co.uk/change-proposal/cp1524/
4	P382 on BSCCo Website	https://www.elexon.co.uk/mod-proposal/p283/
3, 5	BSCPs on the BSCCo Website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps

External Links		
Page(s)	Description	URL
5	2013 TAPAP report	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-techniques/technical-assurance-performance-assurance-parties-within-performance-assurance-framework/
9	SVG227	https://www.elexon.co.uk/meeting/svg227/
13	SVG229	https://www.elexon.co.uk/meeting/svg229/
15	SVG230	https://www.elexon.co.uk/meeting/svg230/