Issue 88 ‘Clarification of BSC Arrangements relating to Complex Sites’

Meeting 3

25 November 2020

Agenda and meeting objectives

Agenda:

1. Update on actions from meeting 2
2. Energy Netting
3. Categories of Complex Sites
4. Estimation Techniques
5. Process Improvements
6. AOB
7. Meeting close

Objectives:

- Determine whether netting Import/Export volumes under one MSID should be explicitly allowed under the BSC, and if so, under what circumstances
- Agree any required updates to Complex Site estimation techniques
- Agree principles regarding different categories of Complex Sites

ACTION UPDATES

Actions

#	Action	Update
1	Elexon to update BSCP514 and BSCP502 per outcomes of the Issue Group	Will be done following this meeting
2	Elexon to create a list of ‘standard’ Complex Sites	Elexon has created a draft set of Complex Site Categories, Agenda item 3
3	Elexon to issue a Request for Information on Complex Sites	Issued in September, responses circulated and will be discussed
4	Members to submit examples of Complex Site Supplementary Forms – Elexon to draft a standardised CSSF proof of concept	Additional examples required
5	Elexon to draft anonymised examples of disputes relating to Complex Sites	Completed
6	Elexon to analyse Complex Site registration	Completed

Complex Site Registration

Period	Total Complex MPANs	New Complex	Changed to Non Complex
2013	116	16	4
2014	129	24	11
2015	132	9	6
2016	137	14	9
2017	157	26	6
2018	198	44	3
2019	194	12	16
2020	201	10	3

Caveats:

- This covers measurement class C sites only
- This covers the period since we started receiving extracts from the DTN (March 2013)
- We assume the “Complex Site Indicator” flag has been populated correctly by the MOA
- Our DTN extracts do not provide full coverage of the market. We estimate that we see approx. ~90% of MTD submissions required under the BSC (i.e. on a change of agent/Meter)
- We’ll need to have seen at least one MTD submission for a site to identify whether it is complex or not. I.e. there will be sites where there have been no changes that would trigger an MTD submission since we started receiving DTN extracts. Of the ~162k measurement class C MPANs currently registered in SMRS, we have seen at least one MTD submission for 94%
- As we do not see all MTD submissions, the latest one we hold may not actually reflect the current setup onsite. I.e. if there has been a change onsite but we did not see the MTD submission because it was not sent over the DTN

Request for Information

Issued for 15WD between 28 September and 16 October 2020

Received 18 responses from respondents representing:

- 2 Generators
- 5 Suppliers
- 6 Supplier Agents
- 5 Community Organisations
- Community Energy England (representative body with ~256 members)
- A Virtual Lead Party
- A License Exempt Operator; and
- A Software Solutions Provider to Supplier Agents

Responses were mostly focused on questions 1 - 4

Vast majority of respondents in favour of the BSC allowing multiple premises at geographically contiguous locations

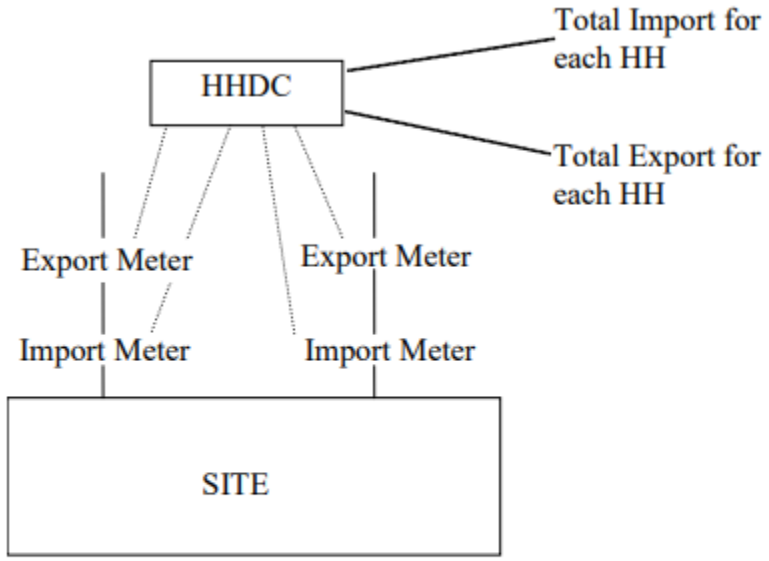
ENERGY NETTING

TOTALISATION

ELEXON

What is Totalisation?

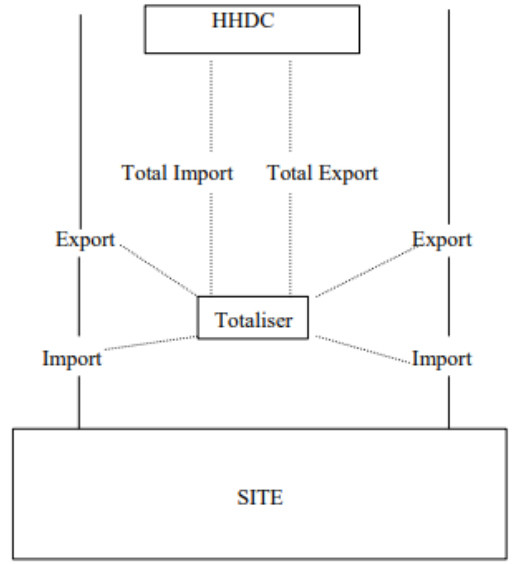
- Totalisation is the summation of multiple feeders/circuits under one Metering System ID
- This can be done “off-site” by the HHDC or “on-site” by intelligent outstations which then submit a total value to the HHDC
- Totalisation is not considered a complex site as a HHDC will automatically summate the values of multiple feeders if it receives them on the D0268 data flow.



No. of Import MSIDs = 1

No. of Export MSIDs = 1

Netting of Exports and Imports shall not be permitted at site.



No. of Import MSIDs = 1

No. of Export MSIDs = 1

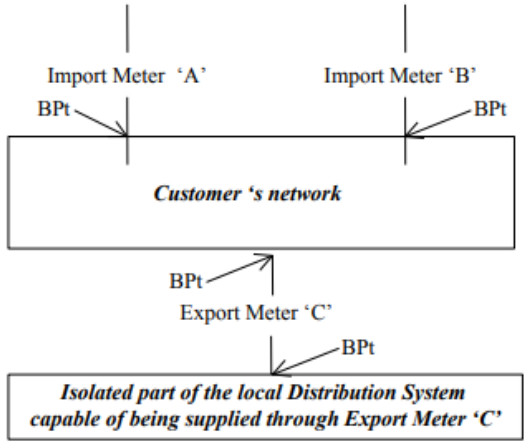
NETTING

ELEXON

Netting

- Netting is the deduction of Import from Export values to give a “net” output.
- Netting is currently permissible on private networks to allow facilitation of third party access.
- Netting is also permissible on certain “feed through sites” to allow for the gross Import or Export value per MSID to be calculated where energy traverses an isolated part of a distribution system recording exports as imports or vice versa.

Import Meter A + Import Meter B - Export Meter C.



BPt = Boundary Point

Import to the Customer’s network = Import Meter ‘A’ + Import Meter ‘B’ – Export Meter ‘C’

This is acceptable in SMRS since there is no on-site generation and an Export type Meter, Export Meter ‘C’, is measuring feed-through energy as opposed to embedded generation Export.

No. of Import MSIDs = 1

No. of Export MSIDs = 0

Import = (M1 AE + M2 AE) – (M1 AI + M2 AI)

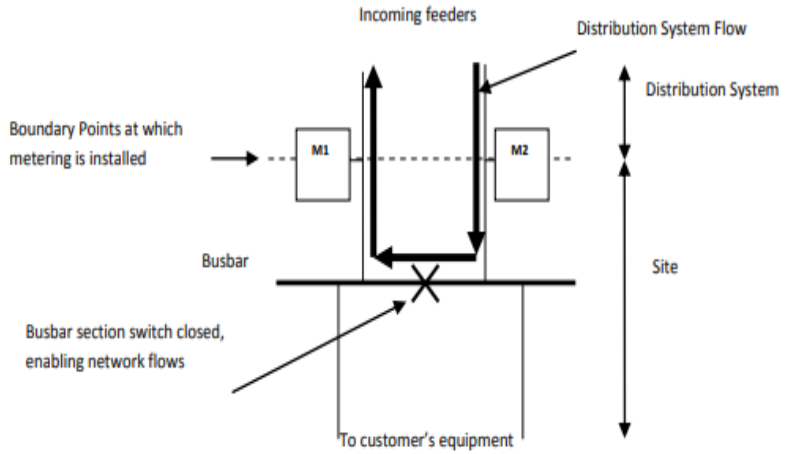
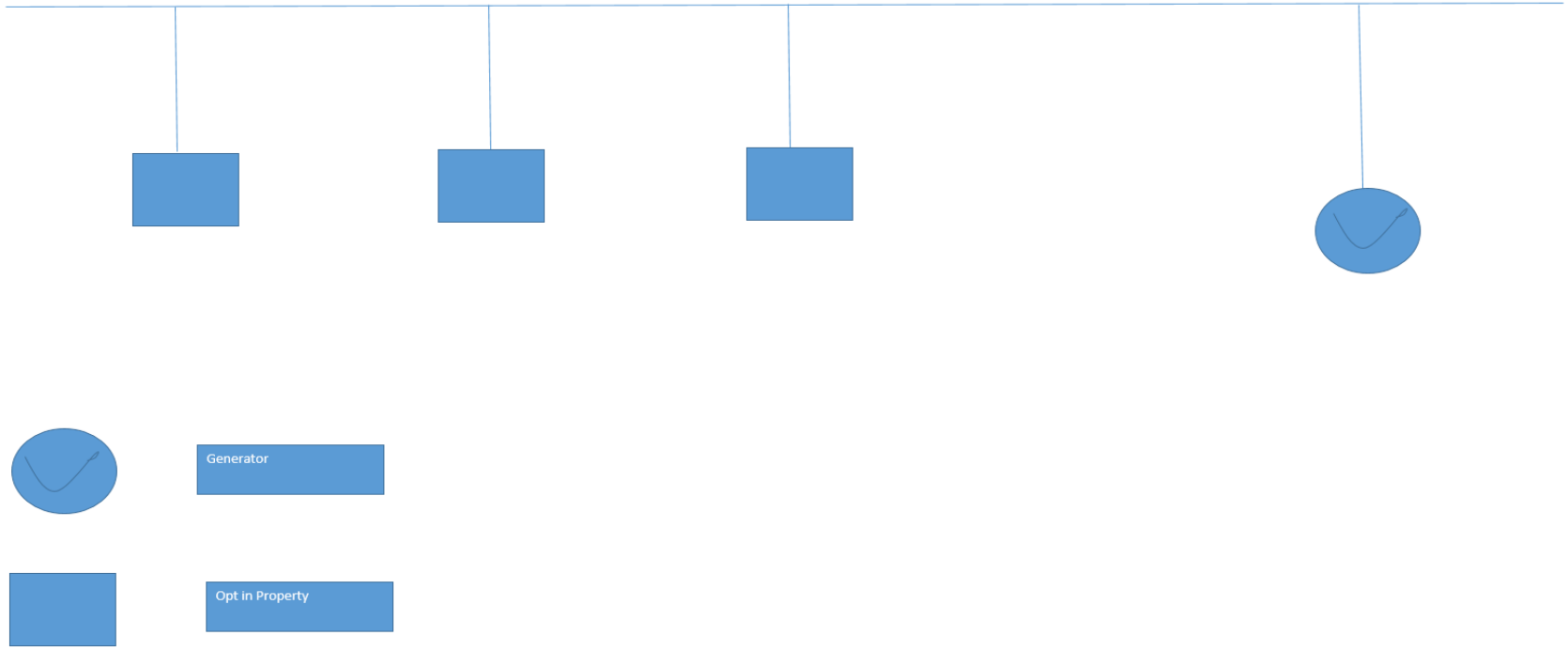


Figure 1 Distribution Network Flows

Current Restrictions of Netting

- Under current SVA market rules Imports and Exports must be traded as gross quantities of each measurement quantity under separate MSIDs
- In practice this means that netting of Exports from Imports where energy traverses the Total System is restricted
- This creates issues for local energy schemes that require netting across the Total System to allow them to be practical



Issue 88

- Issue 88 is focused primarily on the following questions:
  - Whether local energy schemes should be allowed to net Exports from Imports across geographically contiguous locations; and
  - Whether industry parties believe that ‘SVA Site’ should be defined to add clarity to the existing Complex Site arrangements.

- The current lack of definition in relation to SVA Site creates ambiguities between instances of “compliant netting” and subtracting Exports from Imports to create a “net” output for a “site”.

- The majority of responses to the recent Issue 88 RFI were favorable to allowing netting for the facilitation of energy local schemes.

Energy Local
making energy work for you

Energy Local: Benefits of Complex sites and Netting for Community Energy

Presentation for Elexon in Response to Issue 88

November 2020

Overview – benefits to the system

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Benefits of local consumers and generators in a complex site:

- Balance the network locally by encouraging households to shift power use to when generation operates.
- Use network more efficiently, reduces costs – value in DUoS is insufficient to encourage this – use of market is better.
- DNOs have little control at LV (as demonstrated during low demand/high renewables during lockdown) – a useful tool
- Encouraging matching supply to generation reduces the spill into SVA – becoming more significant with more renewables.
- Encourages shift from peak load and reduces risk of inbalance.

Working to understand benefits to DNO with SPEN.

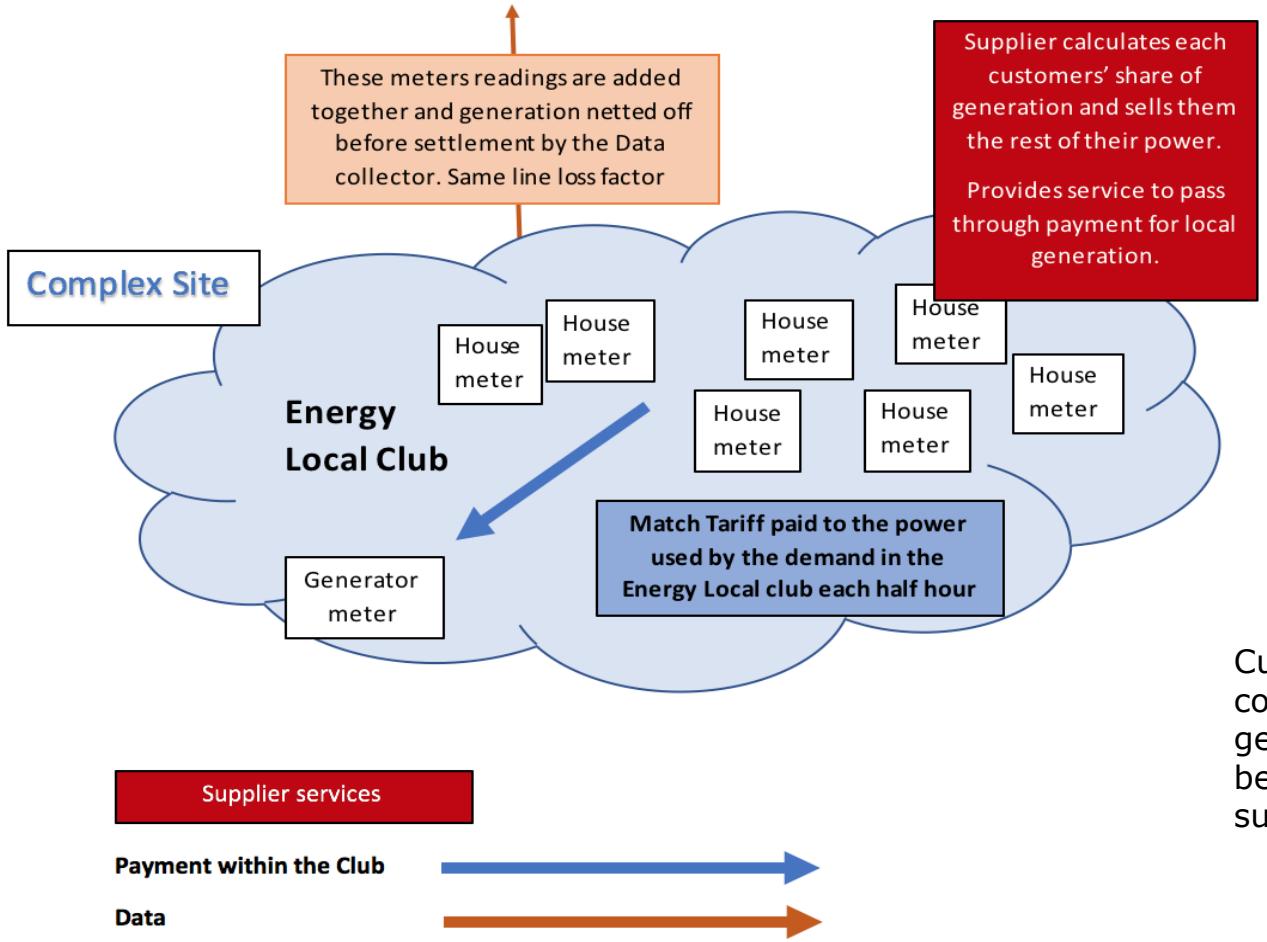
Overview – customer benefits

- Reduce the costs
- Tackle fuel poverty
- Give local renewables a fair price for their power
- Retain income in the local economy
- Build a new relationship with energy system
- Retain services and support of a licensed supplier – customer protection.

All these encourage more efficient behaviour when carried out locally.

Benefits greatest at small scale.

How it works



Currently all consumers and generators beneath same substation.

Simple community scale customer led balancing

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- Complex sites with netting is a simply way to incentivise balancing the local network.
- Domestic demand side response without need for complex Balancing Mechanism contracts.
- Community based and can incorporate consumption and generation in the rest of the community.
- Customer sets the parameters.
- Can incorporate automation, electric heating and storage.

Other System Benefits

- Platform for domestic DSR in accessible, consumer friendly way.
- Reduce cost of new connections.
- Increases income for new renewables.
- Helps integrate electric vehicles and electric heating, whilst reducing network strain.
- Supports transition to a flexible energy market.
- Very inclusive of all demographics

Defining a complex site

- Benefits are greatest on local networks where local network constraints can be managed:
  - Keep all generators and consumers under one primary substation.
  - Limit it to LV or 11kV connected meters.
    - Some areas such as northern Scotland have almost no LV lines.
- Ensure all generators & consumers have same LLF:
  - If all meter points are at the same voltage this is simple.
  - If some are 11kV and some LV (eg. domestic consumers and 11kV wind turbine) either a new LLF is needed or combination of existing LLFs.

Bethesda as an example

- High potential for small scale renewables.
- Growing demand for EV charging – both local and tourist needs.
- Potential voltage rise issues at 11kV and above.
- Locally balancing the network can help reduce these constraints and reduce network costs.
- Using local solar and hydro – reduces spill into SVA.

Photo credit: Ashden Awards

Example of 11kV and LV need: Island of Islay

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making energy work for you

- Weak network.
- Generation connected at 11kV, homes at LV.
- Elsewhere generation would be LV connected.
- Need for local balancing to support weak network but without 11kV to LV complex site this is not possible.

Photo credit: Islay Energy CBS https://islayenergycbs.com/community-wind-turbine/

Policies that local balancing supports

- Ofgem BEIS Smart Systems Flexibility Plan.
- Domestic demand side response.
- Ofgem's priority of decarbonising the network.
- BSC Objective D: Promoting efficiency in the implementation and administration of the balancing and settlement arrangements.
- BSC Objective C: Promoting effective competition in the generation and supply of electricity.
- Flexibility contracts offered by DNO at LV.

Watching brief on BEIS exempt supply consultation – complex site neatly distinguishes between the two.

High demand from communities

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- Bethesda: 160 customers & two 100kW hydros
- Corwen: 60 consumers and one 55kW hydro
- Crickhowell: 40 households and 50kW Hydro
- Bridport: 50 households with 50kW wind turbine.
- Machynlleth: Hydro and 80 customers.
- Roupell Park, Brixton: housing estate with rooftop (block of flats) solar
- Working with Octopus on BEIS funded project to bring in 1000 households.
- In total around 130 communities have expressed interest

Provides a practical means for households and communities to take an active role in the energy market whilst maintaining customer service and reducing costs.

Example of decarbonising industry: Milford Haven Port

- Commercial club with complex site in place.
- Part of ports overall transition to being a clean tech hub and Welsh Government funded PiSCES research project.
- Planned expansion of club as part of region wide Innovate UK funded Prospering from the Energy Revolution project.

Picture taken from Milford Haven Port Authority website: https://www.mhpa.co.uk/the-port/

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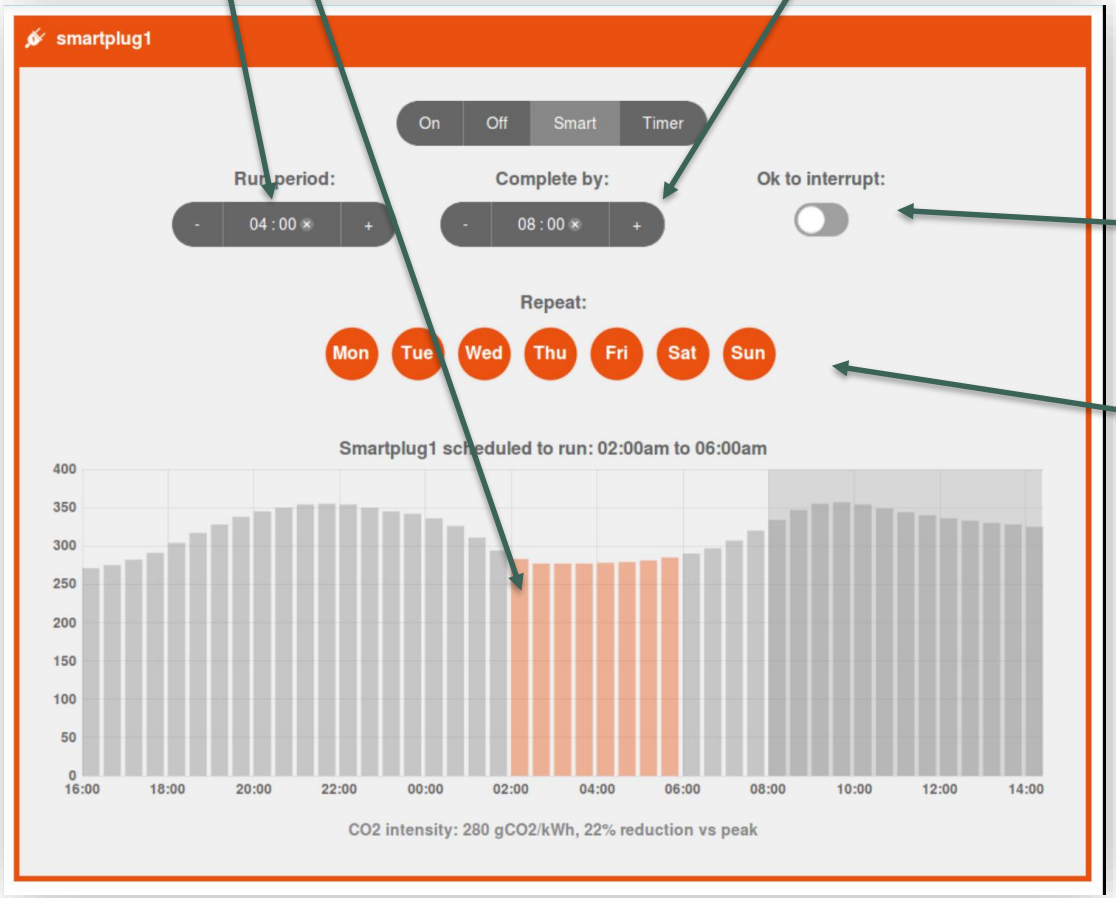
Example of Incorporating Automation: The Scheduler

Megni
Energy Monitoring

DE MONTFORT UNIVERSITY LEICESTER

This takes x hours, I need this done by x time, – find the best time to do it.



OK to interrupt?

Schedule each day?

Request for Information

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- Community Energy England (representative body with ~256 members)
- A Virtual Lead Party
- A License Exempt Operator; and
- A Software Solutions Provider to Supplier Agents

Responses were mostly focused on questions 1 - 4

Vast majority of respondents in favour of the BSC allowing multiple premises at geographically contiguous locations to be totalised

Energy Netting – RFI Responses Summary

Question	Yes	No	Neutral/No Comment	Other
Should the BSC allow multiple premises at geographically contiguous locations (and connected to the same substation at the same voltage) to be totalised under one MSID?	15	1	1	1
Should the BSC allow multiple premises at geographically contiguous locations and connected to the same substation (but at different voltages) to be totalised under one MSID?	13	2	1	2
Should the BSC allow netting of Exports from Imports (in certain clearly defined circumstances) to facilitate local energy schemes, such as the one described in the example provided? What would be the benefits of doing this?	16	2	0	0
Do you think it is necessary to define ‘site’ in the context of SVA to add clarity to the existing Complex Site arrangements as described in BSC Procedures?	16	1	1	0

Energy Netting – RFI Question 1 (1/2)

Question	Yes	No	Neutral/No Comment	Other
Should the BSC allow multiple premises at geographically contiguous locations (and connected to the same substation at the same voltage) to be totalised under one MSID?	15	1	1	1

Majority of respondents **in favour** of allowing totalisation at geographically contiguous locations (and connected to the same substation at the same voltage) to be totalised under one MSID

Energy Netting – RFI Question 1 (2/2)

Summary of responses:

- Key benefits are that, when combined with netting, totalisation enables local balancing and encourages domestic and business demand side management, providing a practical reward for engagement;
- Some responses suggest a limit on the number of MSIDs to be included and highlight the need for “geographically contiguous locations” to be defined;
- One response suggests going further and allowing premises across a contiguous site to be totalised under one MSID under adjacent substations;
- The response opposing totalisation suggests that it would add unnecessary complications to the current issue and that it may be more relevant to pursue when future developments are implemented

Energy Netting – RFI Question 2 (1/2)

Question	Yes	No	Neutral/No Comment	Other
Should the BSC allow multiple premises at geographically contiguous locations and connected to the same substation (but at different voltages) to be totalised under one MSID?	13	2	1	2

Majority of respondents **in favour** of allowing multiple premises at geographically contiguous locations and connected to the same substation (but at different voltages) to be totalised under one MSID

Energy Netting – RFI Question 2 (2/2)

Summary of responses:

- Key benefits were as described in Question 1
- Responses highlight that consumers rarely have a choice as to what voltage they are connected at, risks creating unfair disparity in communities that must connect at 11KV due to the network being weak;
- One response suggests that totalised usage across voltages would be less common, but that there is no advantage in limiting the size and extent of the potential applications of a positive change;
- Complexities of differing line loss factors to be considered;
- One response highlights that Complex Site Meter mapping with the DA/DC and MOA to enable difference Metering has been time-consuming for an established project; process will need to be made more transparent for customers to be able to benefit meaningfully
- Respondents not in favour of this note that differing network charges and difference line loss factors would be impractical and that it adds unnecessary complications to the current issue

Energy Netting – RFI Question 3 (1/4)

Question	Yes	No	Neutral/No Comment	Other
Should the BSC allow netting of Exports from Imports (in certain clearly defined circumstances) to facilitate local energy schemes, such as the one described in the example provided? What would be the benefits of doing this?	16	2	0	0

Majority of respondents **in favour** of allowing netting of Exports from Imports (in certain clearly defined circumstances) to facilitate local energy schemes

Energy Netting – RFI Question 3 (2/4)

Key benefits identified:

- Potential to remove barriers to innovation
- Increases the viability of community renewable energy schemes
- Could unlock commercial value from local balancing
- Encourages local balancing that helps strengthen the network;
- Helps connect more renewables at lower cost;
- May facilitate exemptions for certain sites;
- Would give more consumers a greater and more varied choice;
- Potential to improve electricity system balancing efficiency and reduce network reinforcement costs;
- Would further realise the benefits of Smart meters

Energy Netting – RFI Question 3 (3/4)

Key benefits continued:

- Would facilitate “efficient, economic and coordinated operation of the national electricity transmission system”;
- Would help tackle fuel poverty;
- Would reduce network reinforcement costs;
- Would remove ambiguity in the current arrangements, which is a barrier to the wider roll-out of low carbon technologies;
- Gives consumers an incentive to invest in nearby low carbon generation and storage;
- Introduces new form of domestic demand side response;
- Reduces the risk of imbalance by matching periods of demand to periods of generation;
- Would give consumers more choice on how/when they use electricity.

Energy Netting – RFI Question 3 (4/4)

The only dis-benefits identified by the respondents against netting were:

- The local energy schemes introduce some different parameters & as the circumstances require being clearly defined, it would be better served by having specific rules & criteria for these arrangements, many of which are in development & evolving; and

- Many of these allowances would add complications, especially as it would, potentially prove difficult to determine the “clearly defined circumstances”.

However some of the respondents in favour of netting raised concerns:

- The netting solution may not be scalable for large numbers of MSIDs

- Some proposed a cap on the number of MSIDs allowed

Energy Netting – RFI Question 4 (1/2)

Question	Yes	No	Neutral/No Comment	Other
Do you think it is necessary to define ‘site’ in the context of SVA to add clarity to the existing Complex Site arrangements as described in BSC Procedures?	16	1	1	0

Majority of respondents believe it **is necessary** to define ‘site’ in the context of SVA to add clarity to the existing Complex Site arrangements as described in the BSC Procedures

Energy Netting – RFI Question 4 (2/2)

Summary of responses:

- Current ambiguity over what constitutes a “site” leads to confusion and may be enabling differing interpretations between Suppliers;

- One respondent did not believe creating a new definition would be helpful as having a clear and consistent definition of all terms across all Codes, regulations and legislation is most beneficial. Based on this, their belief is that the definition of ‘site’ in the BSC should align with the definition in the Electricity Class Exemptions as these are commonly used by local energy schemes. However, they note this definition is widely regarded as ambiguous

- One respondent suggested a possible definition of an SVA site:

    - A “site” should be limited to where all meter points are on the same part of the network, at the very least beneath the same primary substation (i.e. not either side of a normally open point) and connected at 11kV or LV. The line loss factors should be the same or a limited range of generic line loss factors (to facilitate a complex site between 11kV and LV on weak networks.

Energy Netting – Questions for the Issue Group

1. Should the BSC allow multiple premises at geographically contiguous locations (and connected to the same substation at the same voltage) to be totalised under one MSID?

2. Should the BSC allow multiple premises at geographically contiguous locations and connected to the same substation (but at different voltages) to be totalised under one MSID?

3. Should the BSC allow netting of Exports from Imports (in certain clearly defined circumstances) to facilitate local energy schemes?

4. Do you think it is necessary to define ‘site’ in the context of SVA to add clarity to the existing Complex Site arrangements as described in BSC Procedures?

CATEGORIES OF COMPLEX SITES

Creation of “Class” Categories for Complex Sites

- Totalisation would not be considered “Complex” where no other mathematical differencing is required outside of the aggregation of multiple feeder into the same premise.
- BSC and relevant CSDs would be amended to include the criteria for each class and the process for which these classes must be “approved”.
- The current example diagrams would be removed from BSCP514 and transferred to a guidance document.
- The “Class” of the Complex Site would be added to the Complex Site Supplementary Form and must be identified on the form.

Classes 1 and 2 – Licence Exempt Distribution Network

- Where one or more customers within a Licence Exempt Distribution Network (LEN) are supplied with electricity by a third party licensed Supplier and therefore these customers have their own MSID and that LEN does not have generation installed behind the Boundary Point.
  - The exception to this is where all customers within the LEN have opted to have electricity supplied by a third party licensed Supplier and therefore all customers have their own MSID, this shall be deemed an associated distribution system and therefore not considered a Complex Site.
- Where Class 1 is selected then the Supplier/MOA must also populate whether the MSID that the CSSIF relates to is located at the Boundary Point or related to an MSID embedded within the network.
- Boundary Point MSIDs should identify themselves as such on the CSSIF and be registered against the MTC 998. The CSSIF for Boundary Point MSIDs should include all related MSIDs that are embedded within the LEN
- Embedded MSIDs should identify the related Boundary Point MSID on the CSSIF and be registered against MTC 997.
- All MSIDs related the LEN should have the same MOA and DC appointed.
- Where the Boundary MSID is registered against CoP 3 or 5 then the embedded MSIDs should use generic Metering Dispensation for location
- Where the Boundary MSIDs are registered against CoP 1, 2 or 10 then a site specific Metering Dispensation will be required for each embedded MSID.
- A Class 1 Complex Site will be self-assessed and identified as such by the Registrant of the MSID and will not be subject to committee approval.
- Complex Site scenario 8.4.3

- **A Class 2 Complex Site will be as above where generation is embedded within the Private Network**
  - Complex Site scenario 8.4.3 (Export).

Classes 3 and 4 - Feed through sites and network flows impacting Settlement Meters

- Where the electrical configuration of a site requires the netting of Exports from Imports in order to calculate the gross measurement quantity of energy for a single MSID or dual MSIDs where generation exists. (Feed through sites and network flows impacting Settlement Meters.)
  - This could be:
    - where a customer's network takes supply from the local Distribution System and feeds out from the customer's network either at the same or a different voltage to another part of the local Distribution System; or
    - where electrical flows (either on the distribution system or the customer's own network) are recorded by the Settlement Meters unintentionally. These will usually appear as additional Imports and Exports and usually on different feeders.
- A Class 3 Complex Site would be limited to:
  - A single premise with the same Supplier (aside from instances of a Shared SVA Meter arrangement) within a defined geographic area (eg within the same postcode); and
  - where the distance between each metered point between the "customers" incoming feeders and the isolated distribution network is within a set geographical limit.
- The Registrant should initially self-assess as to whether an MSID/MSIDs meet the principles of a Class 3 Complex Site.
- A Class 3 Complex Site could be given final approval via:
  - Supplier Self-assessment
  - Elexon approval – similar to a class 4 Trading Unit.
  - SVG Approval
- BSCP514 Complex Site scenarios 8.4.4, 8.4.5 and 8.4.8

- **A Class 4 Complex Site will be as above with embedded generation.**
  - BSCP514 Complex Site scenario 8.4.6

Class 5 – Local Netting

- Where netting is required to facilitate a “net output” for multiple MSIDs in geographically contiguous locations and connected at the same voltage (such as local/community energy schemes). This Class could be further limited to particular types of schemes or arrangements, if one of the intended outcomes is to better facilitate and incentivise local balancing.

- The requirements for a Class 5 Complex Site would need to include :
  - Geographical limitation on the area that could be included in the Complex Site – e.g. Two or more MSIDs connected at geographically contiguous/adjacent locations under the same substation,
  - All MSIDs included as part of the Complex Site should be supplied by the same Supplier and supplied under the same scheme/should be part of the same commercial arrangement and
  - All MSIDs included in the Complex Site should be connected at the same voltage.

- Approval of a class 5 Complex Site to be given by SVG or relevant committee.

Further considerations for the Workgroup

- Should we allow Class 5 Complex Sites to include MSIDs connected at different voltages?
  - Should this be incorporated into Class 5 requirements?

- Any transformer/line losses would need to be considered and accounted for.

- Is SVG approval for a Class 5 Complex Site appropriate?

- Consideration will need to be given to the impacts on:
  - Network Charging
  - Final Consumption Levies

ESTIMATION TECHNIQUES

Estimation Techniques– RFI Question 6/7 (1/2)

Question	Yes	No	Neutral/No Comment	Other
Do you believe the current estimation techniques are clear and robust enough to allow appropriate estimation to be applied in the case of Complex Sites? How do you currently apply estimation techniques in the case of Complex Sites?	5	3	10	0
Do you believe it is appropriate to estimate Export Metering Systems to zero, as is currently required under BSCP502?	3	4	10	1

Estimation Techniques– RFI Question 6/7 (2/2)

- Summary of responses
  - “Predictable” non intermittent generation could be estimated to trend
  - No specific estimation methods for Complex Sites
  - Unclear how estimation techniques should be applied in regards to Import/Export where a Complex Site rule requires netting of the two
- Questions for the WG to consider
  - Do you believe that Export estimation techniques should reflect the type of generation?
  - Would Settlement benefit from a specific Complex Site estimation process?

PROCESS IMPROVEMENTS

Further Changes to Complex Site Process

- Amendments to Complex Site Validation test.
- Mandate the use of the Complex Supplementary Form.
- Clear requirement that a change in feeder status should result in a new Complex Site Supplementary Form
- Removal of guidance from BSCP514 and BSCP502 and creation of a guidance note which will include relevant examples for each “class” of Complex Site
- Updates to the Complex Site Supplementary Form:
  - Standardise the Complex Site Supplementary Form
  - Addition of effective from/to date
  - Addition of “Complex Site Class”
  - Addition of “related MSIDs”

Feedback on the Complex Site form since last meeting

- Microsoft Word is challenging to populate quickly and easily – could the format switch to Excel
- Much of the information required on the CSSIF is duplicated from the D0268
- On some occasions the HHDC creates the Complex Site Rule and populates the form – could the process be more flexible to allow either the MOA or HHDC to be responsible for the CSSIF?
- Could an instance of Supplier to Supplier CSSIF transition be added where multiple Suppliers are involved in the wider Complex Site (such as in Private Networks)?
- Could a specific Change of Supply/Change of Agent process be created in relation to Complex Site to mitigate challenges faced in transferring all relevant detail related to a Complex Site in these existing processes?

A.O.B

Complex Mapping Trading Disputes – Example 1

Background

- The TAA completed an Inspection Visit in January 2020
- During the Inspection Visit, the TAA noted two Category 1.01 non-compliances (Inaccuracy of Standing Data (Key MTD fields) held by Data Collector)
- A non-compliance was recorded against each of the two circuits on site
- The TAA identified that part of the Metering Dispensation that was in place recognised that the Metering Equipment should be registered as Complex
- The D0268 dataflow from the HHDC for had the complex mapping identifier set as “False”. In addition, no Complex mapping form was made available to the TAA
- On further investigation by the Supplier it was discovered that, due to the incorrect complex mapping indicator, the HHDC was allocating energy volumes to Settlement incorrectly
- The MTDs were updated with the correct complex mapping indicator in January 2020, which resolved the error

Complex Mapping Trading Disputes – Example 1

Dispute Deadlines

27/10/2018 08/11/2018 24/01/2019 29/01/2020

Dispute details

Raising Party	XXX
Dispute type	SVA Half Hourly
Date raised	08/04/2020
Disputed period	27/10/2018 – 23/01/2019
MPAN	XXXXXXXXXXXX
GSP Group	_X
Site Name	XXX
Site Type	XXX

Dispute summary

Description	A Technical Assurance Agent (TAA) Inspection Visit identified a Category 1 non-compliance due to incorrect Meter Technical Details, which caused a Settlement Error
Key Dates	The dates to be corrected by the dispute are between 27/10/2018 and 23/01/2019. The error was corrected on 29/01/2020 and data was corrected back to 24/01/2019.
Rectification	Rectification will be through the Post-Final Settlement Run by entering the profiled Half Hourly volumes into Settlement.
Validity	ELEXON considers the Trading Dispute valid against the three Trading Disputes criteria.

Appointment details

	MPID	EFD
Supplier	XXXX	01/10/2012
Meter Operator	XXXX	01/05/2016
Data Collector	XXXX	24/01/2019
	XXXX	01/05/2016
Data Aggregator	XXXX	24/01/2019
	XXXX	01/05/2016

Settlement Error

L 'Metering' 2.1.1 and 2.4.1 of the BSC: "The Registrant of each Metering System shall, in accordance with the relevant BSC Procedures… ensure that such Meter Technical Details are true, complete and accurate…".

Associated Settlement Risk

Risk 12: "The risk that SVA Metering System technical details are created incorrectly"

Materiality

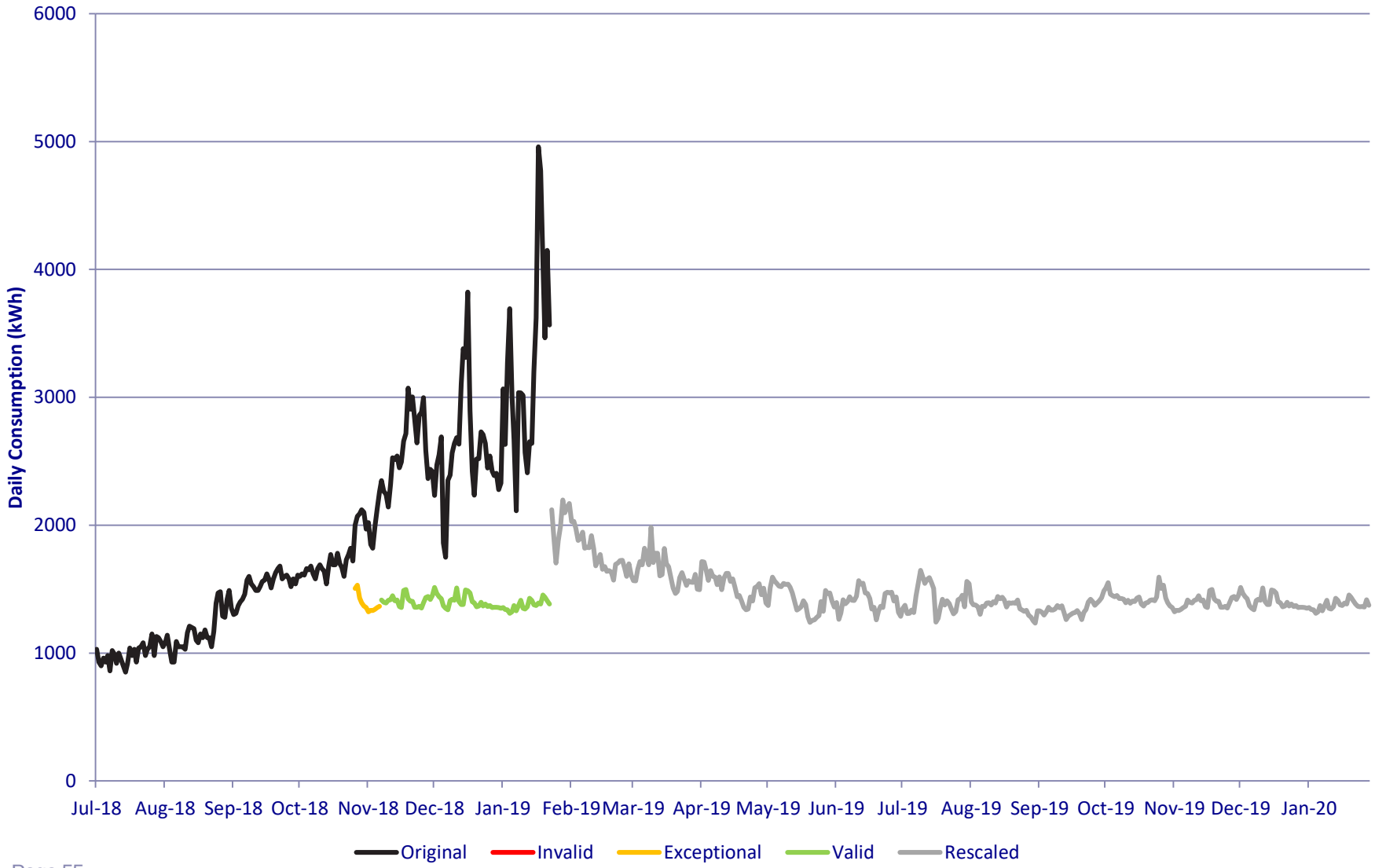
Valid: £6,581

Exceptional: £7,084

ELEXON

Complex Mapping Trading Disputes – Example 1

Chart of Settlement



ELEXON

Complex Mapping Trading Disputes – Example 2

Background

- The HHDC had an aggregation rule in place to deduct the metered volumes of three customers, who were supplied via private distribution networks, from the site's main Meter readings
- This aggregation rule was appropriate until three wind turbines became operational in April 2013
- The HHDC analysed the impact that the wind turbines had on the metered volumes allocated to the Boundary Point MPANS
- Its analysis concluded that there were no errors with the metered volumes of the Import Boundary Point MPANs
- The metered volumes of the Export Boundary Point MPANs, however, would be incorrect under the current aggregation rule
- ELEXON, the HHDC and the HHMOA developed an updated version of the aggregation rule to take the three wind turbines into account
- It was found that, under the current aggregation rule, the metered volumes of the Export Boundary Point MPANs had been under-accounted by 13,649,744 kWh since 2013

Complex Mapping Trading Disputes – Example 2

Dispute Deadlines

01/05/2013 16/06/2016 19/09/2016 Ongoing

Dispute details

Raising Party	XXXX
Dispute type	SVA Half Hourly
Date raised	16/02/2018
Disputed period	16/06/2016 – ongoing
MPAN	XXXXXXXXXXXXX, XXXXXXXXXXXXX, XXXXXXXXXXXXX
GSP Group	_X
Site Name	XXX

Dispute summary

Description	The Export volumes of a Half Hourly (HH) site had been calculated incorrectly and entered into Settlement due to an error with the aggregation rule.
Key Dates	The Export volumes has been incorrect since Settlement Day 1 May 2013.
Rectification	The rectification will be carried out by implementing an updated aggregation rule in the HHDC's system. The volumes produced shall then be submitted to Settlement through the normal and Post-Final Settlement Runs (DF).
Validity	ELEXON considers the Trading Dispute valid against the three Trading Disputes criteria.

Appointment details

	MPID	EFD
Supplier	XXXX	01/03/2018
	XXXX	01/05/2013
Meter Operator	XXXX	01/05/2013
Data Collector	XXXX	01/05/2013

Settlement Error

BSC Section L2.4.1: "The Registrant of each Metering System shall, in accordance with the relevant BSC Procedures: (a) establish and maintain Meter Technical Details in respect of the Metering Equipment; (b) ensure that such Meter Technical Details are true, complete and accurate; (c) provide such Meter Technical Details to the CDCA or (as the case may be) to the relevant Data Collector."

Materiality

Valid: £147,184

Exceptional: £158,955

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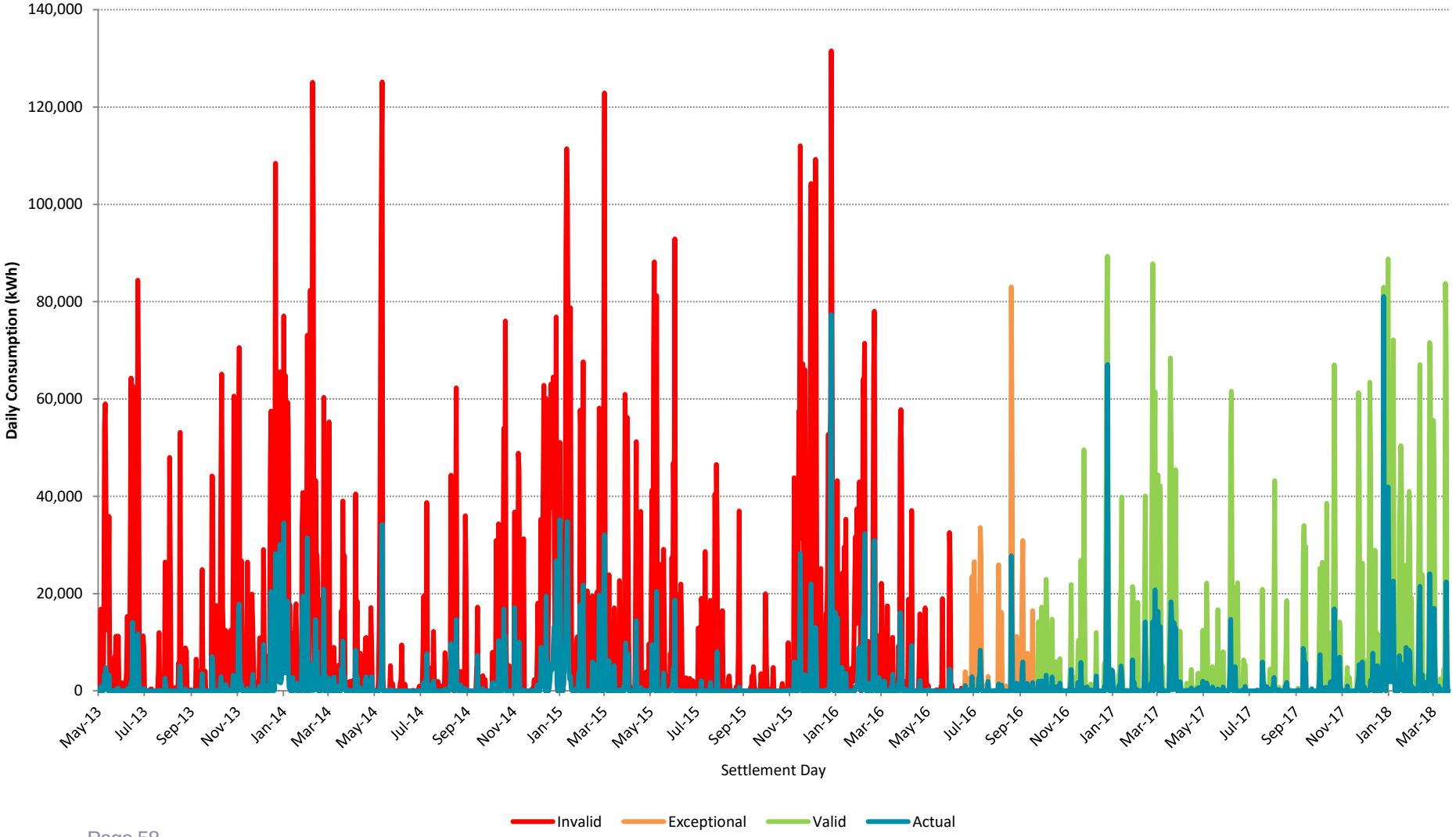
Complex Mapping Trading Disputes – Example 2

Chart of Settlement



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Complex Mapping Trading Disputes – Example 3

Background

- On 3 September 2015, a gas storage facility, which is connected to a private network, was energised at an industrial estate
- The Supplier for the Import Boundary Point MPAN (Supplier 1) subsequently created an aggregation rule to subtract the AI data for the gas storage facility from the AI data for the Import Boundary Point MPAN
- This aggregation rule was created to prevent the AI data for the gas storage facility from being duplicated across two MPANs
- In 2016, another Supplier (Supplier 2), sought approval to use the same private network to connect an anaerobic digestion (AD) plant.
- This was agreed on the condition that the Supplier obtained a Metering Dispensation and that the HHMOA updates the aggregation rule to take the energy volumes of the AD plant into account.
- The AD plant was energised on 22 December 2016

Complex Mapping Trading Disputes – Example 3

Background (cont.)

- On 8 February 2018, the MOA replaced the Meters for the Import Boundary Point MPAN due to a communication fault and issued a new set of MTDs to Supplier 1
- Following inspection of the new MTDs, Supplier 1 realised that the aggregation rule had not been updated
- The MOA advised Supplier 1 that Supplier 2 had not obtained the required Metering Dispensation for the AD plant's Meters
- Supplier 1 considered that the energy volumes, which were allocated to the Import Boundary Point MPAN and the Export Boundary Point MPAN, had been incorrect since the AD plant was energised on 22 December 2016.
- Therefore, Supplier 1 raised a Trading Dispute to correct the energy volumes for both Boundary Point MPANs
- ELEXON clarified with the HHMOA and Supplier 1 that the aggregation rule could still be updated despite the absence of a Metering Dispensation for the AD plant's Meters
- The HHMOA then updated the aggregation rule to take the energy volumes of the AD plant into account

Complex Mapping Trading Disputes – Example 3

Dispute Deadlines

Dispute details

Raising Party	XXXX
Dispute type	SVA Half Hourly
Date raised	28/03/2018
Disputed period	22/12/2016 – 26/11/2017
MPAN	MPAN 1 (AI), MPAN 2 (AE)
GSP Group	_X
Site Name	XXX
Site Type	XXX

Dispute summary

Description	The energy volumes for a Half Hourly (HH) site had been calculated incorrectly due to an error with the aggregation rule.
Key Dates	The HH Data Collector, has corrected the data from Settlement Day 27/11/2017 onwards. The period to be corrected through this Trading Dispute is 22/12/2016 – 26/11/2017.
Rectification	The rectification will be carried out by recalculating the energy volumes for the Boundary Point MPANs based on the updated aggregation rule. The data produced shall then be submitted to Settlement through the Post-Final Settlement Run (DF).
Validity	ELEXON considers the Trading Dispute valid against the three Trading Disputes criteria.

Appointment details

	MPID	EFD
Supplier	XXXX (AI)	28/02/2001
	XXXX (AE)	22/12/2016
Meter Operator	XXXX (AI)	28/02/2001
	XXXX (AE)	22/12/2016
Data Collector	XXXX (AI)	28/02/2001
	XXXX (AE)	22/12/2016
Data Aggregator	XXXX (AI)	28/02/2001
	XXXX (AE)	22/12/2016

Settlement Error

BSC Section L2.4.1: “The Registrant of each Metering System shall, in accordance with the relevant BSC Procedures: (a) establish and maintain Meter Technical Details in respect of the Metering Equipment; (b) ensure that such Meter Technical Details are true, complete and accurate; (c) provide such Meter Technical Details to the CDCA or (as the case may be) to the relevant Data Collector.”

Associated Settlement Risk

SR3019: The risk that Half Hourly Meter Operator Agents (HHMOAs) do not provide correct Meter Technical Details (MTDs), including when HHMOAs make changes to MTDs, to the Half Hourly Data Collector, resulting in Meter readings not being collected or misinterpreted.

Materiality

Valid: £141,663

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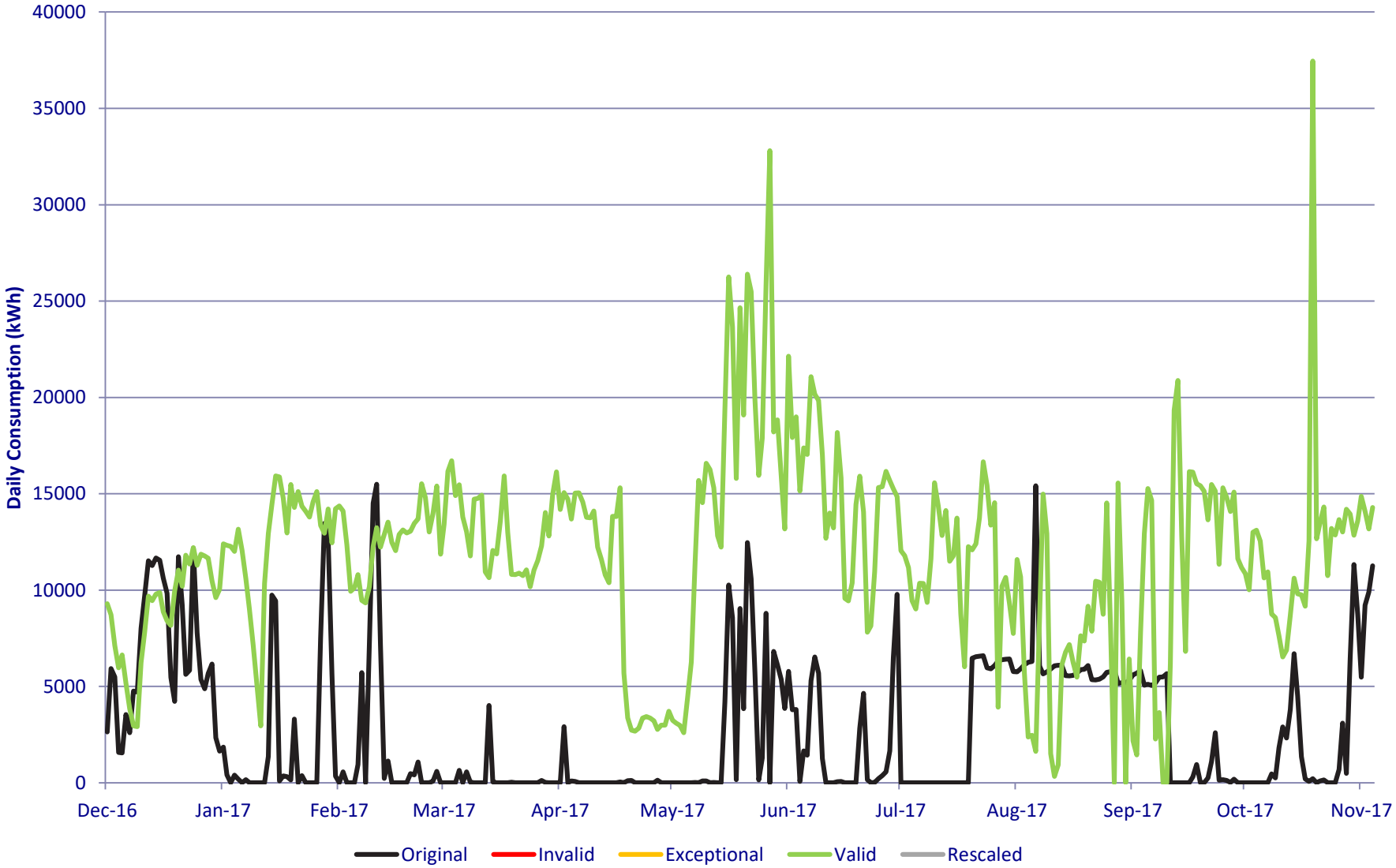
Complex Mapping Trading Disputes – Example 3

Chart of Settlement – MPAN 1



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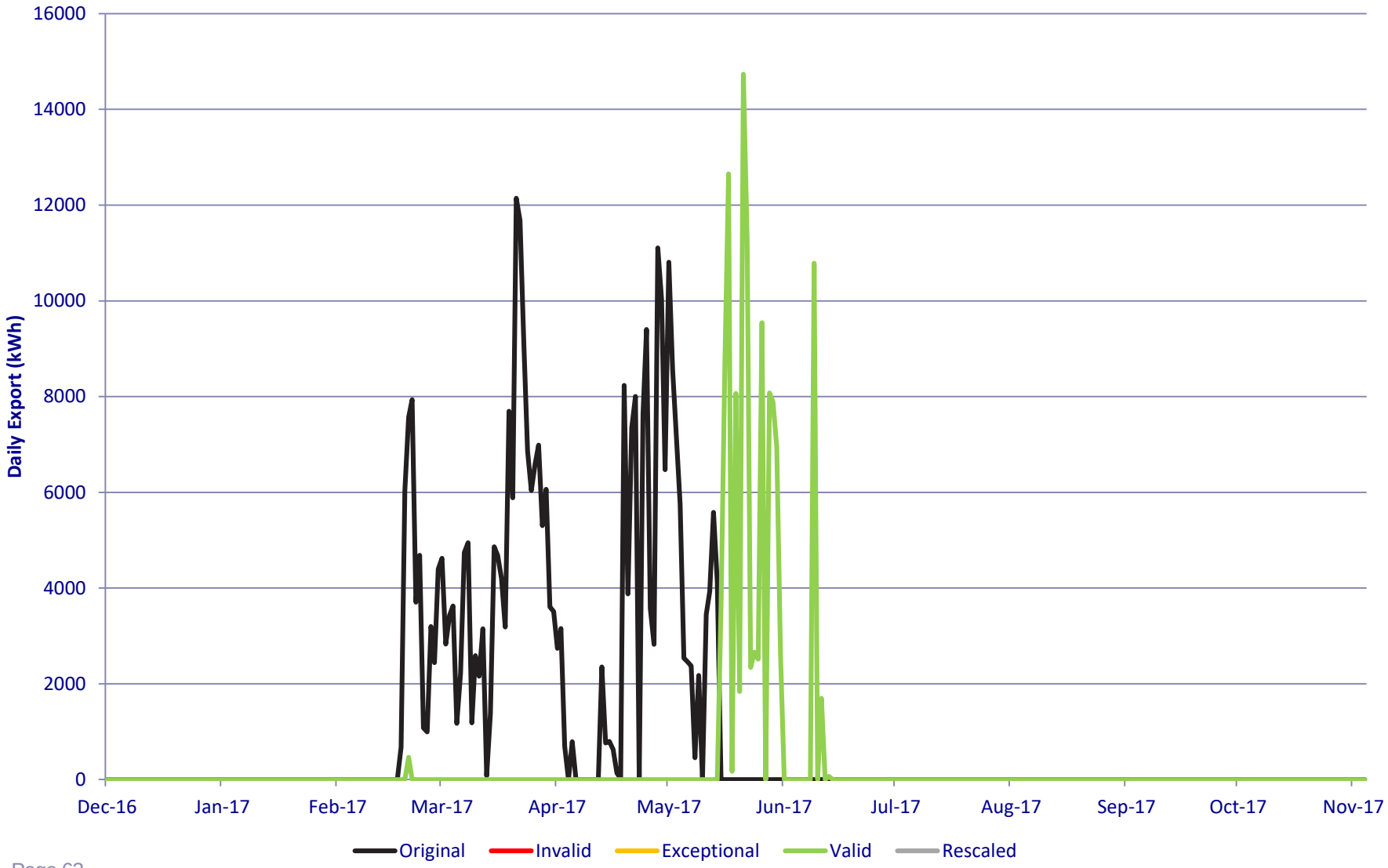
Complex Mapping Trading Disputes – Example 3

Chart of Settlement – MPAN 2



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THANK YOU

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