ELEXON

# Minutes

## P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point' Industry Expert Group

| | | | |
|---|---|---|---|
| Meeting number | **1** | Venue | **Teleconference** |
| Date of meeting | **21 January 2021** | Classification | **Public** |

| **Attendees and apologies** | |
|---|---|
| **Attendees** | |
| Elliott Harper (Chair) | Elexon |
| Craig Murray | Elexon |
| Colin Berry | Elexon |
| Iain Nicoll | Elexon |
| Abidemi Akeredolu | Elexon |
| Katie Wilkinson | Elexon |
| Sophie Bentley | Elexon |
| Riccardo Lampini | Elexon |
| Dnieper Cruz | Elexon |
| Ian Hall | IMServ |
| Claire Addison | Flexitricity |
| Alastair Martin | Flexitricity |
| Nik Wills | Stark |
| Paul Bedford | Drax |
| Kristina Leary | SMS |
| James Taylor | SMS |

| Attendees and apologies | |
|---|---|
| Rick Parfett | Association for Decentralised Energy |
| Taimoor Zamaan | Centrica |
| Paul Troughton | Enel-X |
| Lee Stone | E.ON |
| **Apologies** | |
| Alessandra De Zottis | Semborp |

## P375 - Industry Expert Group Meeting 1

### 1. Introduction and Objectives

1.1 Elexon opened the meeting by listing the agenda and objectives:

a) Discuss and agree 'Virtual Lead Party (VLP) Hub' solution;

b) Review/amend Code Subsidiary Documents (CSDs) and data flows; and

c) Agree answers to outstanding questions

### 2. P375 Summary

2.1 Elexon gave an overview of the P375 solution and noted the P375 FMR was sent to Ofgem for decision on 16 December with a recommendation for approval.

2.1.1 The IEG noted that the new Code of Practice (CoP) 11 and the amended BSCP601 'Metering Protocol Approval and Compliance Testing' have been approved by the Panel and form part of the P375 solution, and are therefore not going to change as part of the Industry Expert Group (IEG) process.

2.1.2 Elexon informed the IEG that P375 would be implemented on 23 June 2022 as part of the June 2022 BSC Release if a decision was received by 30 April 2021, or on 3 November 2022 if a decision was received after 30 April 2021 but before 30 June 2021.

2.2 Elexon explained the purpose of the IEG: to agree the detail of the new "VLP Hub" processes and the related amendments to the relevant CSDs in line with the P375 solution.

2.2.1 The"VLP Hub" processes will be based as closely as possible on the existing Supplier Hub processes, with two key exceptions:

i VLPs will replace Suppliers at the centre of the hub; and
ii No Half Hourly Data Aggregator (HHDA) involvement – Half Hourly Data Collectors will send data directly to the Supplier Volume Allocation Agent (SVAA)

2.3 IEG members noted that the amended CSDs would be circulated for industry consultation following agreement by the IEG, before being presented to the Panel at the earliest opportunity.

### 3. 'VLP Hub' High Level Principles

3.1 Elexon explained the high level principles to which it drafted amendments to the relevant CSDs.

3.1.1 New 'VLP Hub' processes will be added to BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' and BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS' and that the titles of these CSDs would be amended to add "and Asset Meters registered with the SVAA".

3.1.2 New Qualification requirements for 'VLP Hub' members will be added to the Self Assessment Document (SAD).

3.1.3 New Data Transfer Catalogue (DTC) Data Flow (Dxxxx') for HHDCs to send Asset Metering Systems Metered data to SVAA - SVAA issues P0034 (Missing Data) or P0035 (Invalid Data) as appropriate.

3.1.4 New instances of each relevant Supplier Hub 'D-flow'.

3.1.5 New 'P-flow equivalents' of all Supplier Hub D-flows proposed for use by participants without DTN access.

a) Identical structure with the exceptions of:

i Headers and footers; and
ii Transfer mechanism.

3.1.6 VLPs will be able to select their preferred transfer mechanism.

3.1.7 Where VLP Hub transactions are between Party Agents that both have a Data Transfer Network (DTN) Gateway, D-flows should be used.

3.1.8 Suite of P-flows involving VLPs introduced for P344 'Project TERRE':

a) Metering System Identifier (MSID) Data Item should include Asset Metering System Identifier (AMSID) as well as MSID;

b) MSID Pair Data Item should include AMSID Pairs;

c) AMSIDs will be allocated by SVAA – 13 digit number taken from an agreed range of numbers that will not be used for MSIDs, specifically the first two digits should not be in use by other participants; and

d) Assumed VLPs will not need an MSID/AMSID Indicator in P-flows.

3.2 Elexon then went on to explain scenarios where VLPs must use BSC Qualified Party Agents:

3.2.1 BSC Qualified HHDC:

a) Asset Meters that have Half Hourly Integral Outstations that are designed to meet the criteria of Asset Metering Types 1, 2, 3 and 4 within CoP11 must be dialled and protocol tested by a BSC Qualified HHDC; and

b) For Asset Meters that are not Half Hourly Integral Outstations,, the VLP could elect to provide the service themselves (or via a 3rd party that is not a BSC Qualified HHDC, or Asset Meter HHDC (AMHHDC)) with a 'lite' Qualification process;

3.2.2 BSC Qualified Meter operator Agent (MOA):

a) A VLP should appoint a BSC Qualified MOA to install and maintain a CoP compliant Asset Metering System; and

b) For Asset Meter Types 4 (limited to Whole Current only) and 5 where the VLP may elect to provide these services themselves (or via a third party that is not a BSC Qualified MOA, or Asset Meter MOA (AMMOA)) with a 'lite' qualification process.

3.3 A member asked whether the SVAA would send confirmation that the HHDC data flow was correct. Elexon noted that the SVAA would only notify the HHDC by exception i.e. where the file was missing or failed validation.

3.4 A member asked whether there would be any data flows impacting Suppliers that were not VLPs – Elexon confirmed that existing flows were being repurposed so Suppliers would never pick up data relevant to VLPs.

3.5 There was significant discussion around the proposed new D-flow, with members asking why a new one is necessary considering D0379 'Half Hourly Advances UTC' and D0380 'Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' together contain all relevant information.

3.5.1 Elexon highlighted that Supplier ID was a mandatory Data Item in D0379 and D0380 and, as this was not relevant to VLPs, a new flow was necessary. This would make the process more efficient for VLPs, as well as ensuring no impact to the existing Supplier Hub data flows.

3.5.2 A member asked whether there would be any data flows that impacted Suppliers that did not choose to be VLPs – Elexon confirmed that existing flows are being repurposed so Suppliers would never receive data relevant to VLPs (i.e. where the J0003 "MPAN Core" data item contained an AMSID, rather than a MSID).

3.6 A member asked what implementation date the new D-flow would be targeting, considering the transfer of governance from the Master Registration Agreement Service Company (MRASCo) to the Retail Energy Code Company (RECCo) in 2021.

3.6.1 Elexon noted that the D-flow would be targeting implementation one Release before P375 (i.e. if P375 is implemented in June 2022, the D-flow would be implemented in February 2022). Following a six week industry consultation in February 2021, the finalised D-flow would be sent to RECCo and Ofgem to be implemented under RECCo. This approach was recommended by MRASco, who said that the new D-flow could be used in testing for the new RECCo processes.

3.7 A member asked whether AMSIDs would be reported on the Electricity Central Online Enquiry Service (ECOES). Elexon confirmed that this would not be the case as AMSIDs relate to Asset Metering Systems which are behind the boundary point and therefore are not relevant to the retail arrangements in this capacity.

3.8 A member asked whether the proposed 'VLP Hub' processes had been designed to work harmoniously with Market Wide Half Hourly Settlement (MWHHS) arrangements. Elexon stated that they had not, as the detail of the MWHHS arrangements were still being developed and that the 'goalposts are moving too frequently' at this point in time, noting that the processes would be revisited with MWHHS in mind at a later date.

3.9 Members considered the new 'Period Asset Metering System Metered Data' data item contained in the new D-flow. They noted that the current format [± NUM(9,1)] was not sufficiently granular as they believed some in industry have interests in volumes lower than kWh. Members agreed to amend the flow to allow these more granular volumes, with a revised data item format of [± NUM(9,3)] . The representative of the Association of Decentralised Energy (ADE) agreed to circulate this data item to its members for review before the next IEG meeting.

3.10 Members agreed the high level principles as outlined by Elexon, with minor amendments to be made to the new 'Period Asset Metering System Metered Data' data item.

## 4. Outstanding Questions

4.1 Elexon explained that in its drafting of the processes it encountered several outstanding questions that required members' input.

4.2 The Workgroup considered when HHDCs should send HH AMSID metered data to SVAA, and when, if ever, HHDCs should send estimated HH AMSID metered data.

4.2.1 Members agreed that getting data to the SVAA as soon as possible should be the aim, but noted that this was not always possible. Therefore a deadline was considered, with either the II or SF Settlement runs seen as viable options.

4.2.2 The benefit of using the II run would be the fact it is not billable, therefore it would allow time to fix any issues in the data in time for SF. However, SF is the time by which data must be received for Parties to be paid for their trades and members felt this was a more natural deadline.

4.2.3 HHDC members were asked about the turnaround time for data as it becomes available. They noted that there is currently no obligation as there the Settlement calendar currently sits with the Data Aggregator, however, they explained that there would be no benefit of holding on to data instead of processing as soon as possible. Other members noted this but expressed concern that the lack of a defined obligation would not be prudent

4.2.4 Members noted that if no data is received by SF then a P0034 'Missing Data' data flow would be sent from the SVAA to the HHDC and the VLP.

4.2.5 Members considered what information should enter Settlement where no data is received by SF. It was generally accepted that an estimation of zero would not be ideal, as it could lead to the VLP receiving an exception report under certain circumstances, but noted any non-zero estimation method must be fit for purpose. Elexon took an action to develop this before the next IEG meeting.

4.2.6 In summary, members agreed that an obligation should be included for HHDCs to submit data as soon as possible (within X working days), with a hard deadline of SF. Where no data is received a P0034 flow would be sent from the SVAA to the HHDC and estimated data (method to be determined) would be submitted to Settlement

4.3 The IEG heard that a suite of P-flows for VLPs was introduced for P344 for the exchange of MSID and MSID Pair data. They agreed that in these flows, “MSID” and “MSID Pair” should be amended to “MSID / AMSID” and “MSID Pair / AMSID Pair” to minimise disruption associated with new P flows. It was also agreed that a flag indicating MSID/AMSID would not be included in the P flows.

4.4 The IEG discussed whether VLP use of the Data Transfer Network (DTN) should be mandatory or optional.

4.4.1 Members noted that the DTN is more secure and reliable. However it was agreed that its use should not be mandated, rather that it should follow the principle of using the DTN as default if you have a DTN gateway, otherwise as agreed by the interested parties.

4.4.2 A member representing a VLP noted that a potential issue with the mandatory use of the DTN is that new flows / improvements can take a long time to integrate into existing companies’ systems. They went on to highlight that not mandating the use of the DTN would allow VLPs to take the process in to their own hands and on their own timescales, and if they choose to do so it will be a cost borne by them.

4.4.3 The IEG agreed that VLPs should follow the principle of the use of DTN as standard, otherwise as agreed by the interested parties.

4.5 Members representing HHDCs and VLPs agreed that HHDCs should send HH AMSID metered data to VLPs, either via a D-flow or P-flow, at the same time as it is sent to the SVAA rather than collated at the end of the week / month.

4.5.1 Members noted that this data should not be sent over email as it is likely to involve the domestic market, and GDPR is restrictive around this point.

4.6 Elexon asked members representing HHDCs whether they would want to define a format and method of transmission for how they would receive data from the VLP, where they retrieve data. Where a VLP is signed up to the DTN use a D-flow or alternatively use a P-Flow.

4.6.1 Members noted that if there was an existing flow from the HHDC to Suppliers under the Supplier Hub, they would want this data transmission defined for the VLP Hub

4.6.2 The potential of creating an equivalent to standardise across all possible combinations of VLP and HHDC was discussed, and members agreed that this should be agreed in the next meeting.

4.7 Elexon asked the IEG whether VLPs would check that the HHDC had protocol approval for an Asset Meter type before appointing them as the Agent.

4.7.1 A member noted that when an Agent was appointed by a Supplier no checks were done until a D0268 ‘Half Hourly Meter Technical Details’ data flow had been received – an appointment would then be made accordingly.

4.7.2 The IEG agreed that this process should be the same for VLPs i.e. checks would only made once Meter Technical Details have been sent, and a de-appointment process followed if the Agent did not have protocol approval.

4.8 Elexon asked the IEG whether Half Hourly Meter Operator Agents (HHMOAs) would be willing to have VLPs install Asset Metering on the limited basis described in BSCP514 and submit information (e.g. MTDs to HHMOA)

4.8.1 A member asked who’s responsible for the asset? Elexon confirmed that in this case, it would be the VLP

4.8.2 Needs to be a way for MOA to highlight that a MOA has been appointed for administrative purposes only.

4.8.3 VLP does not see a particular need to blur the boundary. Elexon agreed to take this option out of the drafting of the CSDs.

4.8.4 Make sure HHMOA does everything, or under the limited extend defined in BSCP514 that VLPs can install.

4.8.5 Discounted using MOA as a middle-man to make VLPs life easier and get access to DTN.

4.8.6 MOA either does everything or VLP does the parts specific to it on a limited basis.

4.9 Elexon asked the IEG whether MOAs would be willing to check existing Metering systems installed for other purposes (e.g. for Capacity Market) for compliance with CoP11

4.9.1 Noting that no MOAs were present, the IEG group believed that this should not be an issue where a MOA takes on an existing MPAN. They noted that there should be a step where the check can be skipped in certain circumstances to allow them to proceed with the process efficiently.

4.10 Members considered the risk of domestic users of the P375 solution using prepayment Meters. It determined the risk to be minimal and therefore did not think any specific provisions for prepayment Meters should be included, but noted this could be revisited in time.

4.11 A member queried whether Party Service Line (PSL) impacts had been considered.

4.11.1 Elexon stated that the only PSL still in use is PSL100 and references to it in terms of Asset Metering in the P375 legal text were deliberately avoided. The main reason behinds behind this was the imminent introduction of the REC and it was focused on SCA and included LDSOs. Where a requirement was seen to be relevant it has either been added to the CSDs (e.g. CoP11 obligations to keep records) or in the Self Assessment Document (SAD) where it is referred to the requirement being equivalent to a part of PSL100 (e.g. for audit trails we say to meet the audit trail – 'equivalent requirements to PSL100 Sections 5.2.1, 10.2 and 10.3 for SVA Metering Systems').

## 5. Updates to BSCPs

5.1 Elexon talked over each amended CSD to summarise the changes made, but did not walk the iEG through the detailed changes, and took feedback from the IEG members

5.2 The IEG had no significant comments on the changes made to BSCP01, BSCP27, BSCP32, BSCP38, BSCP502, BSCP507 and BSCP508.

5.3 A member questioned whether the P flows referenced in BSCP514 should have either a specific number assigned or instead reference the equivalent D flow for ease of understanding

5.3.1 A member explained that D flows do not include equivalent P flows and suggested the inclusion of a short blur explaining this point

5.3.2 Members agreed that the P flows should be specified for audit purposes.

5.4 The IEG noted that further work was required on the SAD and BSCP537 before they could be discussed in detail.

5.5 The IEG had no significant comments on BSCP602 and noted that further changes were expected around the area of the loss of MSID Pairs (to include scenarios where AMSID Pairs are included in Secondary BM Units).

5.5.1 Elexon suggested a walkthrough of BSCP602 at the end of the next meeting could be beneficial and members agreed.

## 6. Actions

- Elexon agreed to amend the new data item 'Period Asset Metering System Metered Data' to allow Asset Meter volumes to be specified at the Wh level before forwarding to the ADE representative for its members to review;
- Elexon agreed to develop a non-zero estimation method for non-submitted AMSID data for the IEG to consider;
- Elexon agreed to further amend the CSDs per discussions, in particular BSCP602 'SVA Metering System Register', the SAD and BSCP537; and
- Elexon will circulate the amended CSDs and other materials at least one week before the next meeting to allow members time to review.