

Minutes

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

Meeting number	2	Venue	Teleconference
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Date of meeting	3 March 2021	Classification	Public
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Attendees	
Elliott Harper (Chair)	Elexon
Craig Murray	Elexon
Colin Berry	Elexon
Iain Nicoll	Elexon
Abidemi Akeredolu	Elexon
Katie Wilkinson	Elexon
Sophie Bentley	Elexon
George Player	Elexon
Ian Hall	IMServ
Alastair Martin	Flexitricity
Nik Wills	Stark
Paul Bedford	Drax
Kristina Leary	SMS
Rick Parfett	Association for Decentralised Energy
Taimoor Zamaan	Centrica
Paul Troughton	Enel-X
Lee Stone	E.ON

Attendees

James Hill	Ofgem
Tom Elliott	Energy Catapult
Michael Hewitt	Data Communications Company

P375 - Industry Expert Group Meeting 2

1. Introduction and Objectives

- 1.1 Elxon opened the meeting by listing the agenda and objectives:
 - a) Agree VLP Hub solution, including registration, qualification and data estimation techniques where no Asset Meter volume data is received by SF run;
 - b) Agree Code Subsidiary Document amendments and data flows for industry consultation; and
 - c) Close any outstanding questions
- 1.2 Elxon also noted that Ofgem approved P375 on 24 February, for implementation on 30 June 2022 as part of the June 2022 BSC Release.

2. Meeting 1 Summary and action updates

- 2.1 Elxon went through a summary of the first IEG meeting discussions from that meeting. The minutes from the first IEG meeting are available on the [P375 webpage](#).
- 2.2 Elxon also went through the actions that came out of the first meeting, all of which were completed and would be discussed by members at the relevant points in the meeting:
 - a) Amend new D-flow to allow volumes to be specified at Wh level – discussed at the end of the ‘BSCP Updates’ section;
 - b) Develop non-zero estimation method for non-submitted AMSID data – discussed in the ‘Data Estimation’ section; and
 - c) Further amend CSDs per discussions, particularly the SAD, BSCP537 and BSCP602 – discussed in the ‘Registration and Qualification’, BSCP602 Walkthrough’ and BSCP Updates’ sections

3. Data Estimation

- 3.1 At the first meeting IEG 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 would be submitted to Settlement, with Elxon taking an action to develop a potential method to estimate the data.
- 3.2 Elxon presented its proposed method, a five step gradient system utilising the same principle as SVA data estimation (i.e. if you are able to perform the first method, do that, otherwise use the next one down the list etc.) and some of the same methods.
- 3.3 Five methods of estimation were proposed to members (same for both Import and Export volumes):
 - a) and b) swap main and check Asset Meter data where data from one is available;
 - c) where one Settlement Period missing but Asset Meter cumulative register reading available the gap can be filled in
 - d) where the Asset Meter cumulative register available either:

- i VLP or MOA provides operational data or additional information to be used in conjunction with Asset Meter readings; or
- ii HHDC determines the Asset is predictable (e.g. always operates 16:30 to 17:30 on a week day) use the average of four weeks surrounding data in conjunction with Asset Meter readings

e) Where no Asset Meter cumulative register available:

- i VLP or MOA provides operational data or additional information to be used by HHDC to construct profile; and
- ii The operational or additional data provided to the HHDC must include evidence that overlaps actual data held by the HHDC that will be used as a validation check on the information submitted

- 3.3.2 A member highlighted that in the second part of estimation method (d) VLPs would be in a better position than the HHDC to determine whether an Asset is predictable.
- 3.3.3 Another member explained that the nature of these Assets would make them unpredictable by default and so the second part of this method should be removed – the IEG agreed and Elexon took an action to amend the CSDs accordingly.
- 3.4 A member asked what a HHDC should do if the SF run is reached and no data has been received per the proposed method. The IEG agreed that in this case a value of zero should be submitted, with an expectation that it would be resolved in a reconciliation run. Elexon took an action to include this as a final method within the CSDs for clarity
- 3.5 A member asked whether HHDCs are required to estimate reactive data. Elexon confirmed that they did not, and agreed to make this clear in the CSDs.

4. Qualification and Registration

- 4.1 Elexon described the changes to the SAD for Qualification and Registration, explaining that AMMOAs and AMHHDCs must complete generic sections 1-7 and their role-specific sections of the SAD. AMMOAs and AMHHDCs will be subject to the same Qualification and re-Qualification processes as existing Agent roles, and they will also be required to have a communications line in place and complete CVA Qualification for the relevant P-flows. All existing HHMOAs and HHDCs will not be required to re-Qualify and can fulfil the Asset Metering role when P375 is introduced
- 4.1.1 Elexon asked the IEG whether they believed AMMOAs and AMHHDCs should complete all generic sections of the SAD. The IEG believed that they should, as it is what would be expected of any other Party Agent role.
- 4.2 Elexon also described the changes to Section 19 (VLP) of the SAD, noting it has been updated to include questions on Asset Metering. VLPs would be required to complete Section 7 of the SAD 'Initial Data Population and/or Data Migration' if they intend to use Asset Metering. Elexon will raise an MDD CR to add the VLP Market Participant Role to allow VLPs to use the VPN
- 4.2.1 Elexon asked the IEG whether they believed existing VLPs should have to complete Section 7 if they decide to use Asset Metering. Members did not see a reason why they should not, and therefore agreed VLPs should have to complete Section 7 if they wished to use Asset Metering
- 4.2.2 Elexon asked the IEG whether all VLPs should be required to complete the new Qualification steps relating to registering Asset Metering and allocating AMSID Pairs in their Secondary BM Units, or whether they should be required to complete the current VLP Qualification step and be able to choose (at any time after Qualifying as a VLP) whether they wanted to complete additional new Qualification steps to allow them to use Asset Metering and register AMSID Pairs in their Secondary BM Units. Members agreed that there should be the option to choose.
- 4.2.3 Elexon advised that the new Qualification steps would need to be considered as a separate Qualification process, as re-Qualification is not required for VLPs and there would not be a separate role for VLPs using asset metering.
- 4.2.4 Elexon suggested the possibility of a two-part Qualification process: Part 1 would be the existing Qualification for VLPs, Part 2 would be supplementary to this with additional requirements for Asset Metering, and only completed if a VLP wished to use Asset Metering. However, there would be no clear differentiation between a VLP who used Asset Metering and a VLP that did not in the Qualified Persons Workbook or in MDD. Therefore the IEG had two options on how it wished to proceed:

- i Include two part Qualification in the SAD, acknowledging that the two types of VLP will not be differentiated in the Qualified Persons Workbook or in MDD; or
 - ii Raise a Modification to amend Section J to ensure clarity, acknowledging that this will delay clarity on the process for VLPs.
- 4.2.5 The IEG agreed its preference of not explicitly listing the two types of VLP rather than progressing a Modification, noting that it takes significant time to Qualify already, and that they needed visibility of the process as soon as possible in order to most efficiently realise the benefits of P375.
- 4.2.6 Members also agreed that existing VLPs should go through the full Qualification process (i.e. parts 1 and 2) if they wanted to use asset metering as there is no reasonable justification for them to not do so.
- 4.2.7 Elexon advised that they would take the ideas away to agree on a solution.

5. Outstanding Questions

- 5.1 The IEG considered the remaining outstanding question from the previous meeting – would HHDCs want to define a format and method of transmission for how they would receive data from the VLP where they retrieve data? For HH data and reads?
- 5.2 Elexon explained that it had considered this following the meeting and proposed the VLP should send the HH AMSID Metered data file to the HHDC in the 'Dxxxx' formatted specified in the DTC, but without the DTC header and footer (the VLP and HHDC can agree what header and footer to use) so the HHDC will just need to add the DTC header and footer to the data file before issuing it to the SVAA.
- 5.3 A member asked what instances would require data to be sent from the VLP to the HHDC. Elexon noted that this would be the case where the VLP is performing the role of AMHHDC – i.e. where the VLP has access to the Asset Meter and the HHDC would validate and do any necessary estimations.
- 5.4 A member stated that they did not think it necessary to mandate the use of the 'Dxxxx' file for meter data sent by the AMHHDC or the VLP acting as a AMHHDC, as long as the parties involved used an agreed format.

6. Assurance Process

- 6.1 Ofgem noted in its approval letter that Elexon should "... put in place an appropriately rigorous system of assurance checks", highlighting the importance of the independence of Assets behind the boundary Meter. With this in mind, Elexon explained its assurance plan around P375 to the IEG. In summary, this consists of four key aspects: Qualification; Material Error Monitoring (MEM) reporting; peer comparison; and post-implementation spot check.
- 6.1.1 The Qualification processes were covered earlier in the meeting, under Qualification and Registration.
- 6.1.2 MEM reporting will involve the development of a Risk Analytic and Monitoring Dashboard (RAMD), and will look to monitor whether data submissions to the SVAA are complete, timely and accurate, and that the relevant AMSIDs are registered correctly
- 6.1.3 Peer comparison will involve displaying comparative performance of VLPs by utilising the output of the RAMD analysis.
- 6.1.4 The post-implementation spot check will take place 6-12 months following implementation of P375. This will be inclusive of a minimum of one on-site audit check.
- 6.1.5 Members questioned how the site visits would work, considering these are generally split between office visits and actual 'on-site' visits. They noted that while office visits are relatively simple to facilitate at short notice, actual 'on-site' visits are more complex and cannot necessarily be performed without reasonable notice – for example, at a hospital or domestic site.
- 6.1.6 Elexon noted this and highlighted that the specifics and scope of these visits would be developed as part of its normal assurance process, but that it would not seek to cause unnecessary disruption.
- 6.2 Elexon asked the IEG whether it believed Supplier charges should be applied to VLPs. Members noted that these charges are based on settlement performance target recording requirements; as these are not relevant to the VLP role they should not be transferrable.
- 6.3 The Ofgem representative noted that the discussions and assurance plan had given them significant comfort that the appropriate assurance was being put in place for P375.

7. BSCP602 Walkthrough

- 7.1 Elexon walked the IEG through the updates that had been made to BSCP602 since the first meeting.
- 7.1.1 A member asked whether Suppliers would be impacted by the changes. Elexon clarified that there would be no impacts on Suppliers from P375, noting that while Suppliers are included in BSCP602, this is only because they can allocate MSID Pairs to Secondary Bm Units part of the P344 solution. The P375 solution does not allow Suppliers to register Asset Metering systems or allocate AMSID Pairs to Additional BM Units.
- 7.2 Elexon asked the IEG on its thoughts in regards to the timescales in part 2.4.1 (Submit Asset Metering Details at least 10WD before inclusion in Secondary BM Unit)
- 7.2.1 Members noted that it appeared longer than would be necessary or preferable, particularly considering the direction of travel for faster switching. They also appreciated that the burden on systems could not be underestimated and so suggested that 5WD appears workable for the time being, after weighing up the pressures on systems against the desire for timeliness.
- 7.3 A member noted that the current drafting of BSCP602 appears to preclude multiple VLPs from operating behind the same boundary point. The IEG noted that the BSCPs may have been drafted on the basis that boundary point MSIDs cannot appear in more than one BMU, thus limiting the number of VLPs that can operate behind a single boundary point as a BMU can only have a single owner. Effectively, if a VLP registered an secondary BM Unit behind the meter they would have to register the Secondary BM Unit to the associated boundary point. Once this boundary point is 'claimed' it could not be associated with any other Secondary Bm Units.
- 7.3.1 Elexon noted that this was not the intent of the Business Requirements or legal text for P375, and agreed to ensure the CSDs reflect this. Elexon agreed to make any amendments necessary before holding a call with a member of the IEG to confirm that they were comfortable with the process.

8. BSCP Updates

- 8.1 Elexon walked members through the minor updates made to the other documents since the last meeting.
- 8.2 Elexon also walked members through the structure of the new 'Dxxxx' data item and all other related flows as part of the VLP Hub process.
- 8.2.1 A member asked whether the range of '46, 48, 50' was required for the 'Settlement Period Metering System Metered Data' group. Other members noted that VLPs could be providing Balancing Services on clock change days and that it made sense to include this range in case of that eventuality.
- 8.3 A member asked how the Asset Metering Type field is going to be communicated, as the HHDC uses this as part of validation. Elexon explained that it would include either a value of either 1, 2, 3, 4 or 5 as something that the VLP can submit as part of the registration flows. A member suggested using 11.1, 11.2, 11.3, 11.4 or 11.5 to highlight as CoP11 and the relevant Asset Metering Type.
- 8.4 Members highlighted that the number of new instances where existing DTC data flows are used may cause concern, especially given the governance around DTC changes as a result of REC implementation. Elexon clarified that the new 'Dxxxx' flow will impact only SVAA and HHDCs. Any D flows that are being amended are only being done where appropriate and using existing Supplier Hub flows, but repurposed for VLP use with no impact on Suppliers. Further, any D flows that do not impact Suppliers (e.g. MOA to HHDC) will be structurally unchanged, but will include an AMSID Core reference as an alias of the MPAN Core, and will not be mistaken for existing MSIDs. They agreed to make the minimal impact of these changes clear to industry when the CSDs are circulated for consultation.

9. Next Steps

- 9.1 Elexon and the IEG agreed that there was no requirement to meet again before the consultation as the relevant questions had been answered.
- 9.2 Elexon agreed to make final amendments to the documents and circulate the consultation in April, with the intent to present them to the BSC Panel for approval at its meeting in June. This would allow for a further meeting of the IEG following the consultation if it was required.
- 9.3 Elexon agreed to address the issues raised around the BSCP602 drafting and to talk through the amendments with the concerned party.