

REQUEST FOR INFORMATION

INFORMATION FOR P375 & P376 BSC Modifications

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Classification Public

Dear Industry Members,

REQUEST FOR INFORMATION: [P375 'Metering behind the Boundary Point'](#) & [P376 'Utilising a Baselining Methodology to set Physical Notifications'](#)

Information required

ELEXON has agreed to provide analysis and assurance for two BSC Modifications [P375](#) and [P376](#). Disaggregated data is necessary to carry out this analysis. We currently do not have access to demand data or delivered volumes on a disaggregated basis. Therefore we are reaching out to Industry to request this information.

Analysis requirements for P375 and P376 will require Parties to provide us with the following data:

- List of MSIDs (BSC equivalent of MPAN);
- Demand data per Settlement period. Please still contact us if you have demand data in a format other than per settlement period;
- Indicate Settlement periods where demand data is not business as usual (events);
- Where a Balancing service has been provided:
 - Start of Settlement Period relating to the provision of a Balancing Service (including ramping) per MPAN/MSID;
 - End of Settlement Period relating to the provision of a Balancing Service (including ramping) per MPAN/MSID;
 - Type of Balancing Service provided e.g. STOR; and
 - Volume of service provided (P375 only) i.e. Delivered volumes.

To ensure any analysis is robust, we would like to request a minimum of two months' of data.

Ideally, we would like data from parties who have historically provided Balancing Services from mixed use sites. However events may not be restricted to the provision of Balancing Services so even if you have not provided a Balancing Service please do provide us some data.

For P376 the data provided will allow us to create event days or event Settlement Periods. Events are periods when flows over the Boundary Meter will not reflect normal flows, for example the site is providing a Balancing service. A baseline forecasts business as usual usage for a Settlement Period. Without event days the baseline methodologies will incorporate the demand data relating to those events into business as usual potentially skewing the forecasts.

For P375 the provision of data relating to the quantity and timing of a Balancing Service will allow analysis to be carried out on the expected change at the Boundary Meter.

We have provided a template. This will aid us in managing and analysing the data. If you would like to provide data in an alternative format, please contact us to agree this.

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Steps ELEXON will take to maintain confidentiality and anonymity

The demand data can be multiplied by a factor so as to standardise it with all other data provided. For P376 we are interested in:

- The percentage difference between the actual metered data and the forecasted Final Physical Notification (FPN) created through the proposed baseline methodologies for P376.

For P375 we will be:

- Analysing change at the Boundary Point in relation to the service provided. Therefore, there is no need to retain the actual values just the relativity.

Before the data is shared externally, providers of the data will be given the opportunity to review the data.

Background to request

ELEXON is working on two BSC Modifications in conjunction with industry, which seek to create a new Settlement Final Physical Notification (FPN) as well as keep the existing FPN.

[P375 'Metering behind the Boundary Point'](#) proposes to introduce asset level metering, behind the Settlement Boundary Point, to validate the delivery of Balancing Services.

[P376 'Utilising a Baseline Methodology to set Physical Notifications'](#) proposes to allow Parties to use a baseline methodology to determine typical site behaviour in place of submitting Final Physical Notifications for Settlement.

These two Modifications seek to remove barriers to participating in the Balancing Mechanism.

Both Modifications have the same defect – certain sites do not allow accurate Physical Notifications (PN) to be set. Actions taken behind the Boundary Meter, out of the control of the Balancing Service Provider (BSP), make it practically impossible to set accurate PNs, and therefore participate in the Balancing Mechanism, as enabled by Modification P344 ['Project TERRE'](#).

It is a requirement of participating in the Balancing Mechanism to send a Physical Notification to Nation Grid Electricity System Operator (NGESO) before Gate Closure. This is used to dispatch the asset but also flows through into Settlement of the Balancing Service. Many smaller assets may be located on sites, which also have other uncontrollable assets/consumers. As the Physical Notification is currently required to be based on net flows at the Boundary Meter, BSPs will be required to forecast flows for the whole site. Parties offering the Balancing Service may not have access to the Boundary Point metering data or the site may have fluctuating loads beyond their control. This may lead to the Final physical Notifications not reflecting expected metered flows. Any differences between these two figures may result in Imbalance or Non Delivery Charges even if the service was delivered in full. This has been stated as a considerable barrier to entry.

P375 seeks to solve this defect by allowing the FPN and subsequent Settlement to be based on flows at an asset meter installed behind the Boundary Point, whereas P376 aims to solve the defect by applying a baselining methodology using historic metering data to set a more accurate FPN, than the Party may be able to achieve themselves. The inclusion of both approaches allows for BSPs to determine which is most appropriate for their particular circumstances.

We anticipate that the analysis carried out on baselines may prove very useful for other future change such as the provision of flexibility to DSOs.

Reason for request

The Workgroups have requested that ELEXON conduct analysis using real life examples from Great Britain. For P375 the analysis will demonstrate how assurance methods could work in investigating whether the System has

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benefitted from the provision of the Balancing Service. For example, if NGENSO request a decrease in demand, which could be achieved through onsite generation, this could potentially in an extreme case, then be consumed by an onsite battery storage unit owned by the same Party. In this example asset metering would show that the Party has delivered the Balancing Service but the System will not have benefitted. Alternatively the battery may be owned by another Party acting totally independently. In these instances it would be fine for flows at the Boundary Meter to be unaffected. Assurance methods could highlight instances like this, which would require further investigation.

For P376, data is required to validate whether the various baselining methodologies used in other markets can accurately forecast expected flows for a Settlement Period within certain tolerance levels within GB.

These two separate sets of analysis will provide crucial evidence to Industry Parties when assessing the Modifications and provide the Authority extra information when assessing the final solution(s) presented for decision.

What's next?

If you have provided Balancing Services to NGENSO either directly through the BM or outside the BM (Non BM), such as STOR for example, and feel you could provide data to support these two Industry raised modifications please contact bsc.change@elexon.co.uk.

To ensure progress is continued on these two Modifications could you please provide us data by **11 October 2019**. If you wish to provide data, but are unable to meet this deadline, please contact us to agree an alternative.