

P375/6 SUMMARY AND ACTIONS

Discussion Summary

How PN feeds into settlement (Item 3. P376 Baseline)

The Workgroup started with a discussion on how Physical Notification (PN) feeds into settlement. If Settlement data were to be used to construct a baseline, the most up to date settlement data available for that the Boundary meter would be 16WD old as this is when the settlement data is first received relating to a particular settlement period. Therefore it may not be possible to use an up to date and therefore accurate Final Physical Notification (FPN) for both dispatch and settlement purposes. The FPN for Settlement purposes could be set at a prescribed time after the event, when settled metering data relating to the settlement period immediately preceding is available and therefore will naturally be more accurate.

The Electricity System Operator (ESO) representative confirmed that the Grid Code requirement is for the PN to represent flows at the Grid Supply Point (GSP) Group level, with the data captured at the Boundary Point. The PN should be an accurate forecast of actuals flows for the relevant Settlement Period for when the Balancing Service is delivered. The PN turns into the FPN at gate closure. Even though it may not accurately reflect flows, they use the FPN as a baseline to dispatch the asset and instruct the asset to move away from the FPN. One Workgroup Member commented that ESO are really more concerned about the delta provided and this is what they will aim to deliver. The FPN therefore is more a procedural process. They will concentrate on delivering the delta requested rather than adjusting between defined volumes, as in reality they don't have access to the real time boundary metering which would show if this requirement is being achieved.

ESO confirmed that although theoretically the PN could be changed after Gate Closure, this did not happen in practice as the Maximum Export Limit (MEL) was used to effectively change the PN if the PN was not realistic. The Workgroup noted that ESO has access to data to forecast the expected output of a site, and this could be used to set the FPN for dispatch rather than rely on a potentially inaccurate PN.

ELEXON confirmed that the initial solution proposed is to separate out the FPN for dispatch from the FPN used for Settlement and commented that the issue of inaccurate PNs for dispatch should be handled under the Grid Code.

The Workgroup discussed whether baselining would apply to all, or just some, sites. It was determined that this would be a commercial decision made by the VLPs. They would determine which sites were more applicable for baselining where it may be difficult to install operational metering, whereas operational metering may be better suited for sites which had variable demand that couldn't be predicted by a baseline. A Balancing Mechanism (BM) Unit could be made up of a combination of the both baselined sites and sites with operational Metering. The Workgroup discussed a possible need for a baseline solution to also be created to forecast flows at Boundary Meters associated operational metering, providing a way of testing Independence and monitoring the P375 solution.

Baselining and operational metering could be used as a way of ESO gaining assurance that the delivery of the Balancing Service benefitted the system. ESO commented that the current processes reward based on delivered volumes not received volumes.

A Workgroup Member was concerned that using baselines would result in volumes being included in the cash out stack that weren't known until much later after the event and that this would distort market signals. ELEXON confirmed that the volumes which were used in the stack were contracted volumes and these would not change under this modification. The purpose of creating a baselined FPN for Settlement purposes is to calculate Imbalance and Non Delivery Charges for individual parties.

Registration of Metering systems (Item 4. P375)

ELEXON outlined the current process for the creation and registration of MPANs. Currently Distribution Network Operators (DNOs) create the 13 digit MPAN, and only licenced suppliers can register MPANs. The Workgroup noted that if new 13 digit MPANs were created under P375, there would need to be coordination with the Master Registration Agreement (MRA). Registering secondary pseudo-MPANs with 13 digit numbers would therefore be preferable so that future data flows are future proofed (for example to avoid longer digits and/or strings being

P375/6 SUMMARY AND ACTIONS

truncated) as many current systems are designed to accommodate 13 digits. This also seems to be common practice already for operational non-BM or asset metering on sites. Once a Supplier is the Registrant of a Meter, it is the Supplier that then appoints a Meter Operator Agent (MOA) and Data Collector (DC). This is a requirement under the current process but the Workgroup noted that this may too onerous for operational metering. There is already a complex process to ensure seamless data transfer and switching on the Data Transfer Network (DTN). It was noted that some features of the DTN are a good match for possible new pseudo-MPAN flows.

The Workgroup agreed that although the DNO was responsible for identifying boundary metering, this is not a good match for the P375 solution, as they would have no involvement behind the boundary meter, as this would be between customer and VLP. A question arose around the anticipated split between DSO and DNO, but DNOs do not currently actively manage their networks, and the P375 solution shouldn't limit the potential for DSOs to actively manage network.

The Workgroup discussed the need to link the operational metering to the boundary metering for the purposes of being able to adjust metered volumes. It noted that there were other industry projects that may require the installation of Operational Metering. The Workgroup particularly noted the Targeted Charging Review (TCR), CUSC Modifications CMP280/281, Final Consumption Levy, Multiple Suppliers P379, Electric Vehicles and domestic battery solutions. Although it was deemed outside the scope of this Modification by this Workgroup, they should be taken into account to avoid creating unintentional blockers and to ensure everything was heading in the same direction. For example when registering a Meter, information could also be voluntary provided in relation to the asset such as EV, Storage.

The Workgroup considered who could create and maintain this new register of operational Meters. It could be the VLPs, DCs, or the Supplier Volume Allocation Agent (SVAA) or ESO. The Workgroup agreed that SVAA was best placed to do this. It was agreed that a qualified MOA should install and maintain the Meters, but that this could be a different MOA to the one appointed to the boundary Meter.

It was discussed whether there was a need a process for VLPs to provide the SVAA data and information about both the site and asset. This would include what voltage the operational meter was connected at (to be able to apply a line loss methodology). The VLP would need to provide information and data about the site for assurance for example site schematics/line diagrams. Questions arose whether this was a one off process or whether this should be periodically confirmed to provide continued assurance. It was noted that ELEXON had developed a Self-Service Gateway under its Foundation Programme, and that the creation of new pseudo MPANs be managed through this. The register would require the voltage of the Operational metering also for the purpose of adjusting flows for losses.

The Workgroup identified that P375 related to secondary BM Units which were not liable for credited energy. For example operational Metering could not be used within a Supplier BM Unit. Checks would need to be put in place to avoid a situation where two VLPs try to register the same operational Meter into their own Secondary BM Unit.

The Proposer asked the commercial relationship between VLPs and Suppliers and noted that sometimes there can be commercial tension or commercial opportunity between supplier and VLP, but that the site owner/operator/manager is best placed to give/have authority on metering appointing MOAs and balancing decisions, and whether the VLP needs to let supplier know.

The Workgroup agreed that domestic sites were out of scope for now but that any solution should not hinder or block operational metering on domestic sites through the implementation of P375. It was agreed that they can have separate standards, but that would need to be justified.

The Workgroup discussed whether the VLP would create the new pseudo-MPAN, and whether the pseudo MPAN should remain linked to the asset if a new VLP took responsibility A Workgroup Member noted VLPs don't have MPIDs, and would need one to access DTN. It was identified that the key difference between pseudo and normal MPAN is that the normal MPAN needs to be continually 'involved', recording energy use for each half hour all the time.

P375/6 SUMMARY AND ACTIONS

The Workgroup discussed whether pseudo-MPANS need to be 13 digit codes, can anything be done to link to them to the MPAN permanently. This is so the pseudo-MPANS do migrate across with a Change of Supplier at the boundary point and change of VLP control of the asset. It is possible that a repurpose of the Change of Supplier flow using the DTN could be used. There is a possibility of the DTN getting snarled up due to a disconnect between the pseudo and Supplier MPAN. The Workgroup discussed whether the registration system is visible to the DNOs. This could be done under a separate Modification so as not to create blockers, and so it was agreed to keep it out of scope. The Workgroup commented that there would need to be a process to transfer Meter Technical Details (MTDs) between VLPs and a process to deregister operational metering. It requested that a consultation question should ask views on transferring pseudo MPAN's MTDs, in addition transferring between Secondary BM Units.

A Workgroup Member commented on DNO charging which relates to things like final demand and residual charging, believing that the issues faced by storage providers using a generation licence would also be applicable to this Modification. They believed that a consultation question should be included to gain further information on this. They commented that as the solution focused on Secondary BM Units, it was inherently relating to balancing services. Another Workgroup Member commented that DNOs recover their costs based on boundary meter volumes, so they didn't think this was an issue for the Workgroup to consider

What metering standards are appropriate (Item 5. P375)

The Workgroup considered whether there would need to be a dispensation process for operational metering and noted that many dispensations are due to not being able to put meter in correct location currently judged on a case by case basis by the Imbalance Settlement Group (ISG) and / or Supplier Volume Allocation Group (SVG).

A Workgroup Member commented that balancing services are done with active power and so questioned the need to keep reactive standards mentioned in the Codes of Practice (CoPs). ELEXON noted that there were reactive power markets in other countries and these shouldn't be excluded when deciding the standards for the P375 solution to ensure the solution is futureproofed. The Proposer noted Measurement Transformers can be commissioned using a range of techniques, including injection and prevailing load. Primary injection is typically used on new high voltage sites prior to energisation.

ELEXON commented that because of the legal definition of a supply Meter, some Electric Vehicle (EV) charging sites were registered as Unmetered Supplies (UMS), but considered that if the data was accurate it should be used. The Workgroup agreed that the solution should accommodate and future proof governance around EV Meters and assets, and this should be considered in the redlining. It was noted that schedule 7 of the electricity act wouldn't apply as the Meters used for the P375 solution would not be for supply.

A Workgroup Member thought the same accuracy standards should be maintained for operational metering, but that removing the requirements for storage, communications, and display would reduce the cost, commenting that storage requirements can increase the cost of Meters. A Member commented that there would be incentive for VLPs to ensure metering was functional as they would not be paid for any services if the relevant Meters were broken or communications were down. The Workgroup decided to investigate standards for metering available and used, through impact assessment or consultation. The Workgroup agreed that standards for Metering under P375 should sit in a new document, and ELEXON agreed to create a straw man document to consult on. The Workgroup noted the desire to do this sooner rather than later so that industry could be aware of what standards would likely be required under P375.

A member questioned whether it would be possible to revert back to boundary if the P375 meter became broken or problems with the communications.

P375/6 SUMMARY AND ACTIONS

Item 7. Losses

The Workgroup agreed that it would be appropriate to use DNO methodology for applying Line Loss Factors (LLFs) to operational metering, and that this should be based on the voltage difference. This would keep the solution simple by using the existing values, and the Workgroup did not believe that the distance from the operational meter to the boundary would need to be considered. The Workgroup decided that the VLP would need to declare LLF for each pseudo MPAN, but questioned how unusual voltage configurations could be handled.

Item 8. Performance Assurance Techniques

The Workgroup noted ELEXON's suggestions and commented that there should be an automated technique using statistical methods to identify gaming.

The Workgroup considered who would be best placed to provide assurance for any solution. One Member commented that this could be best achieved under the Grid Code rather than BSC. ESO commented that it believed assurance should be a BSC process. The Workgroup questioned what sanctions could be applied to non-compliance. It also commented that there would need to be a robust definition for independence of control and site configuration, so that sanctions could be appropriately applied.

Actions

No	Action	Action on
1.	Send baseline scenario examples out to the workgroup	ELEXON
2.	Find out what agreement SVAA can get with the MRA on pseudo MPAN format	ELEXON
3.	Investigate Business Requirements for registration of pseudo MPANs and operational to boundary meter losses matrix	ELEXON
4.	Investigate standards needed for operational metering and how to assess impact and consult industry	Proposer/ELEXON
5.	Pick up the COP standards that are applicable and amendable in a straw man document to bring to the next meeting	ELEXON
6.	Research to find out how far LLFs go in terms of voltage step up/step down	ELEXON