

## Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

## P379 'Enabling consumers to buy and sell electricity from/to multiple providers through Meter Splitting'

This Modification will enable consumers to be supplied by multiple suppliers<sup>1</sup> through Balancing and Settlement Code (BSC) Settlement Meters at the Boundary Point. P379 will allow multiple suppliers to compete for the supply or export of electricity through a single Meter without needing to establish an agreement between all of the suppliers involved for every instance.



This P379 Workgroup recommends that P379 is progressed to a revised Assessment Procedure timetable.

This Modification is expected to impact:

- Suppliers (Licensed and Exempt)
- Virtual Lead Parties (VLPs)
- Distribution System Operators (DSOs)
- Generators
- Balancing and Settlement code Company (BSCCo)
- Master Registration Agreement (MRA)
- Distribution Connection Use of System Agreement (DCUSA) (potential)
- Connection and Use of System Code (CUSC) (potential)
- Grid Code (potential)
- Data Collectors

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<sup>1</sup>For the purposes of the P379 solution, the term supplier is as defined under the Electricity Act and not the BSC. Which means a licenced or licence exempt supplier. P379 Interim Report refers to 'supplier', not 'Supplier' as defined under the BSC.



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## About This Document

This document is the P379 Workgroup's Interim Assessment Report to the BSC Panel.

As requested by the Panel at its meeting in January 2019 ELEXON will present the P379 Interim Assessment report to the Panel at its meeting on 13 June 2019. The Panel will consider the Workgroup's recommendations and agree how to progress P379.

There are two parts to this document:

- This is the main document. It provides details of the Workgroup's key discussions and a recommendation of how the Modification should progress, including revisions to the progression timetable. It also summarises the Workgroup's key views on the areas previously set by the Panel in its Terms of Reference.
- Attachment A contains the P379 Policy and Regulatory Log.

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## Why Change?

P379 seeks to address a significant barrier to competition in the market rules whereby multiple suppliers are unable to compete for behind-the-meter energy volumes, measured via the same Metering System. Whilst the SVA Shared Metering Arrangements do facilitate splitting of Metered volumes between different Suppliers, these arrangements are too restrictive, for example they require agreements in advance between the Suppliers and only apply to Half Hourly Metering Systems. The Proposer believes that the existing arrangements don't adequately facilitate the development of local energy markets and supply innovation, and effectively mean there is a monopoly of one Party, the 'default' or 'Primary' Supplier, over a consumer's energy volumes behind a Settlement Meter at any given time, restricting competition and innovation.

## Proposed Solution

The solution is still being assessed and developed by the Workgroup. As it stands and at a high level the Proposer intends consumers to effectively have two (or more) relationships for their energy volumes: one with a 'main' or 'Primary' Supplier (who would continue to be responsible for metering and data collection/data aggregation activities under the BSC); and others with other Trading Parties. It will achieve this through the creation of a new Party Agent role, the Customer Notification Agent (CNA), who would reconcile power flows through the Settlement Meter, enabling accurate allocation of volumes and costs to different Trading Parties, which in turn will allow these Trading Parties to reflect accurate volumes in their bills and payments to consumers.

## Impacts and Costs

As the solution has not been agreed impact assessment have not yet been obtained. However, we expect the costs for ELEXON to be high. The costs for industry participants will be influenced by whether the solution is optional or mandatory for Primary Suppliers. Currently, the Proposer is minded for it to be mandatory, which will impact all licenced Suppliers. We expect P379 to impact Suppliers (Licensed and Exempt), Virtual Lead Parties (VLPs), Distribution System Operators (DSOs), Generators, Balancing and Settlement code Company (BSCCo) and the Master Registration Agreement (MRA). P379 may also benefit from consequential changes to the Distribution Connection Use of System Agreement (DCUSA), Connection and Use of System Code (CUSC) and the Grid Code.

## Implementation

The Proposer would like to target the earliest available Implementation Date. Under the proposed new progression P379 progression plan the earliest scheduled release would be November 2020. However, the actual Implementation Date will be subject to impact assessments of the agreed solution.

## Workgroup progress

During initial P379 meetings the Workgroup has considered the scope of the changes required to implement multiple supplier arrangements without the need for bilateral

agreements. The Workgroup has spent time understanding the current legal frameworks, including presentations from Ofgem on the licencing regime. The aim is to remove the need to negotiate settlement arrangements on a case-by-case basis. The Proposer wants to determine how the proposed solution and obligations for multiple suppliers would work within the current legal frameworks. The Workgroup agreed to recommendations, where possible, on how the legal frameworks (such as changes to licences, legislation or other Codes) could be improved to better facilitate the P379 issue. The solution should be effective for licensed Suppliers and enabling for license exempt suppliers. Due to the nature of these changes, the Workgroup is requesting an extension to the P379 timetable. The Areas for Consideration are set out in Section 6.

## Recommendation

The Workgroup are recommending a revised progression timetable to enable the P379 to be fully assessed and developed, returning with the Assessment Report on 9 April 2020.

In accordance with BSC Section F2.6.10 the Panel may seek the views of the Authority as to whether the findings of this report are consistent with the Authority's provisional thinking and the Panel may direct the Workgroup in consequence of the Authority's view.

At this time, the Proposer and Workgroup are not making any recommendations in relation to the Applicable BSC Objectives. Views against the Applicable BSC Objectives cannot be made at this time, as the solution is not sufficiently progressed. However, the Workgroup's provisional discussions and agreements have been included in this report.

## 2 Why Change

### What is the issue?

The BSC does not enable the splitting of volumes supplied or exported by two or more different suppliers of electricity through a single Meter without the concerned suppliers having to enter into an agreement, which is required to be re-established if the Customer decides to switch away from the licensed Supplier constituting the Primary Supplier for the premises.

A successful solution must enable multiple suppliers, and different types of suppliers (e.g. Electric Vehicle Suppliers and Community Energy Schemes) to compete for the supply or export of electricity through a single Meter without needing to establish an agreement between all of the suppliers involved for every instance.

The solution should ensure any code provisions and procedures are not an obstacle to participation and must ensure that each Meter Registrant's imbalance position is not materially and adversely impacted by other suppliers operating across the Meter.

Currently multiple Supplier arrangements are facilitated by BSCP550 Shared Metering Arrangements put in place to facilitate the splitting of meter volumes between Suppliers. They require an agreement between all Suppliers involved, and existing Suppliers retain a veto over new Suppliers entering the arrangement. Additionally, all Suppliers involved must use the same Party Agents, and meter volumes can only be split based on schedules submitted in advance or on non-settlement meter readings.

### Proposed solution

In the view of the Proposer P379 will bring forward changes to the SVA market arrangements to allow consumers to buy electricity from (or sell electricity to) multiple Trading Parties at the BSC Boundary Point Meter. It would do this by splitting volumes through a single BSC Meter to different Trading Parties. This disaggregation and reallocation process allows the consumers to effectively have two (or more) relationships for their energy volumes: one with a 'main' or 'default' – known as the Primary - Supplier (who would continue to be responsible for metering and data collection/data aggregation activities under the BSC, and many of the licence obligations of a supplier); and others with other Trading Parties, known as 'Secondary Suppliers'.

This change will allow decomposition of commercial aspects of the existing Supplier Hub, better facilitating competitive local energy markets and new balancing services. The technologies and case studies based around commercial pilot schemes already exist, but the activities are not recognised in the BSC framework.

The aim is to remove the need to negotiate settlement arrangements on a case-by-case basis. The solution should be effective for licenced Suppliers and enabling for licence exempt suppliers.

During initial discussions the Workgroup discussions covered the below areas on multiple supplier arrangements:

- Issue and scope of P379
- Exempt supply arrangements
- Balance responsibility
- Review of use cases

### Applicable BSC Objectives

The Proposer believes that P379 better facilitates the **Applicable BSC Objectives (b), (c) and (e)**.

This Modification will better facilitate Applicable BSC objective (b) as it will enable benefits to system management at the local level and thus enable better judgements on residual balancing by the Electricity System Operator (ESO). This Modification, in conjunction with the introduction of VLPs, will also create the potential for greater participation in the Balancing Mechanism (BM), thus supporting system operation by providing the ESO with a greater range of options for economic and efficient system balancing. By creating greater efficiency at local level and through the interaction with system operation, this Modification is consistent with Ofgem's initiatives to achieve more efficient whole system outcomes.

The Modification would better facilitate applicable BSC Objective (c) as it will remove barriers to competition in the energy markets. The current de facto single ownership of the Meter volumes prevents competition being facilitated behind the Meter and greatly limits the development of innovation that could ultimately benefit consumers. Removing this barrier would better facilitate competition between Suppliers and other providers operating in the market, including in the provision of new services facilitated by this Modification.

This Modification better facilitates Applicable BSC Objective (e) as the Electricity Regulation strongly supports consumer choice and demand-side integration, both of which are key drivers of this Modification.

The Proposer notes that P379 will provide the below benefits to the industry:

- A mechanism for boosting take up of smart meters in the domestic and small business market, indeed as a means of unlocking the large swathe of micro-gen and providing a proper route to market combined with co-located storage. It could open up a whole new area of benefits and choice
- A transitional fix to enable innovation behind the meter without having to – and possibly pre-empting the need to – reinvent the supplier hub
- The proposer also notes that other jurisdictions are seeking ways of enabling multiple trading arrangements.

## P379 Workgroup

The BSC Panel agreed with ELEXON's recommendation for the P379 Workgroup to consider the below areas during the assessment procedure:

### Areas for consideration

- a) How export volumes should be considered at the BSC Boundary Point? In particular, to what extent the metering of export should be mandatory, or alternatively whether profiling of export is appropriate and effective in certain cases.
- b) Carefully consider the methodology used to allocate volumes between Trading Parties, to ensure that the most appropriate method, in regards to cost, complexity and effectiveness is developed.
- c) The benefits of expanding this to the Non Half Hourly (NHH) market as well? The challenges and potential complexity/cost implications should also be considered during these discussions.
- d) The solution continues to deliver effective allocation of metered volumes at the Boundary Point, appropriate Performance Assurance Techniques (PATs) shall be required. These may be similar to, or make use of existing PATs, or may be new PATs developed for the P379 solution, as developed by the Workgroup.
- e) The principles being proposed under P379 interact with work currently progressing through in-flight BSC Modification [P376 'Utilising a Baseline Methodology to set Physical Notifications for Settlement of Applicable Balancing Services'](#). The P379 Workgroup should consider how its solution being developed will interact with the work under P376.
- f) How fixed charges associated with the Settlement Meter should be allocated to different Suppliers.
- g) How the Customer Notification Agent (CNA) role will work
- h) Interactions with the current shared metering arrangements and seek to develop a solution to this Modification in a cost effective manner that will fully deliver the intended benefits of the change.

- i) Consider potential cross - code impacts. P379 could have impacts on the MRA, DCUS, CUSC and Grid Code. ELEXON is to engage with the appropriate Code Administrators to ensure Cross code impacts are addressed.

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## 4 Impacts and Costs

### Impact on BSC Parties and Party Agents

Party/Party Agent	Potential Impact
Suppliers	Changes will be required to implement the solution to this Modification. The full impacts will become clearer once the solution has been developed by the Proposer and Workgroup during the Assessment Procedure. However, it is anticipated that there will be both system and document impacts on the majority of Parties/Party Agents listed as being impacted from the solution to this Modification Proposal.  Market participants will have the opportunity to fully assess impacts and costs as part of the Assessment Procedure Consultation.
VLPs	
Generators	
DSOs	
Parties that wish to participate in the CNA role	

### Impact on National Grid as the Electricity System Operator

The impacts on the Transmission Company from the solution to this Modification Proposal will be assessed during the Assessment Procedure. The Transmission Company will be invited to attend the Modification Workgroup meetings and perform an impact assessment during the Assessment Procedure.

### Impact on BSCCo

The impacts on ELEXON from the solution to this Modification Proposal will be assessed during the Assessment Procedure. Impacts on ELEXON will relate to the development and implementation of the solution.

### Impact on BSC Systems and processes

BSC System/Process	Potential Impact
Balancing Mechanism Reporting Service (BMRS)	Potential impact on these BSC systems and processes, depending on the solution developed by the P379 Proposer and Workgroup, and subject to impact assessment.
ELEXON Portal	
Estimated Annual Consumption (EAC)/Annualised Advance (AA)	
Performance Assurance Reporting and Monitoring System (PARMS)	
Technical Assurance Agent Monitoring Tool (TAAMT)	

### Impact on BSC Agent/service provider contractual arrangements

BSC Agent/service provider contract	Potential Impact
Central Registration Agent (CRA)	

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Impact on BSC Agent/service provider contractual arrangements	
BSC Agent/service provider contract	Potential Impact
Funds Administration Agent (FAA)	Potential impact on these BSC Agents, depending on the solution developed by the P379 Proposer and Workgroup, and subject to impact assessment.
Settlement Administration Agent (SAA)	
Supplier Volume Allocation Agent (SVAA)	

Impact on Code	
Code Section	Potential Impact
A 'Parties and Participation'	Changes may be required to deliver the solution to this Modification Proposal, which will be determined through the Assessment Procedure.
D 'BSC Cost Recovery and Participation Charges'	
E 'BSC Agents'	
H 'General'	
J 'Party Agents and Qualification Under the Code'	
K 'Classification and Registration of Metering Systems and BM Units'	
L 'Metering'	
O 'Communications Under the Code'	
Q 'Balancing Mechanism Activities'	
S 'Supplier Volume Allocation'	
S 'Annex S-1 'Performance Levels and Supplier Charges'	
S 'Annex S-2 'Supplier Volume Allocation Rules'	
T 'Settlement and Trading Charges'	
U 'Provisions Relating to Settlement'	
V 'Reporting'	
W 'Trading Disputes'	
X 'Definitions and Interpretation'	
X 'Annex X-1 'General Glossary'	
X 'Annex X-2 'Technical Glossary'	
Z 'Performance Assurance'	

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Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP11 'Trading Disputes'	

Impact on Code Subsidiary Documents	
CSD	Potential Impact
BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes'	The impacts on these CSDs depend on the solution that is developed by the P379 Proposer and Workgroup. Therefore, this list of impacted CSDs is subject to change and is intended only as an indication of the potential impacts arising from this Modification Proposal. The Workgroup will determine which, if any, of these needs to be developed during the Assessment Procedure, and which can be developed as part of the implementation activities.
BSCP501 'Supplier Meter Registration Service'	
BSCP502 'Half Hourly Data Collection for SVA Metering systems Registered in SMRS'	
BSCP503 'Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	
BSCP504 'Non Half Hourly Data collection for SVA Metering Systems Registered in SMRS'	
BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	
BSCP507 'Supplier Volume Allocation Standing Data Changes'	
BSCP508 'Supplier Volume Allocation Agent'	
BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'	
BSCP516 'Allocation of Profile Classes and SSC's for Non Half Hourly SVA Metering Systems Registered in SMRS'	
BSCP533 'PARMS Data Provision, Reporting and Publication of Peer Comparison Data'	
BSCP534 'PARMS Techniques'	
BSCP535 'Technical Assurance'	
BSCP536 'Supplier Charges'	
BSCP537 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators'	

Impact on other Configurable Items	
Configurable Item	Potential Impact
Impacted Configurable Items	To be determined through the Assessment Procedure once the Workgroup has developed the solution to this Modification.

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## Impact on Core Industry Documents and other documents

Document	Potential Impact
Connection and Use of System Code	Changes may be required to deliver the solution to this Modification Proposal, which will be determined through the Assessment Procedure. ELEXON will ensure that cross-Code working is initiated if required during the development of the solution. Currently we anticipate changes being required to DCUSA and CUSC to amend the use of system charges.
Distribution Connection Use of System Agreement	
Grid Code	
Master Registration Agreement	

## Impact on a Significant Code Review (SCR) or other significant industry change projects

In the view of both ELEXON and the P379 Proposer, this Modification does not impact any ongoing SCR.

The SCR exemption request was submitted to Ofgem on 3 January 2019, with a response requested either on or before the BSC Panel meeting at which this IWA will be presented on 10 January 2019.

## Impact on Consumers

The Modification should enable new electricity products for consumers, enabling greater choice and better service. The Modification should also enable greater competition between Suppliers for their consumers, improving value for these consumers.

In summary it:

- allows earlier roll-out of dynamic tariffs and capture of value from changes in consumer behaviour, and for those benefits to be shared with the consumer;
- supports innovation and consumer choice through greater competition for new services; and
- provides opportunity of enhanced revenue streams to compensate for loss of FiTs to new micro-generation sites.

## Impact on the Environment

This Modification would have the following positive environmental impacts:

- supports continued deployment of low-carbon generation and battery storage behind the Meter;
- creates opportunities for new flexibility services and their aggregation for the benefit of Suppliers and distributors, and.
- increased Distribution System resilience, enabling more installation of renewable generation at distribution level.

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### Workgroup Meetings

Four Workgroup meetings have been held to date.

#### Meeting 1 – 27 February 2019

The Objective of the first meeting was to discuss the background of the Modification and gather initial Workgroup views.

The high-level outcomes from questions raised at the meeting are captured below:

- Should meter splitting be a feature of the market?
  - It is assumed to be a feature of the market for the purposes of P379
- Can meter splitting work in practice?
  - There are different options and approaches, but in principle it is feasible
- Is meter splitting compatible with current legislation?
  - The Workgroup is not aware of any explicit blockers, but will need to check as the P379 solution is further developed.
- Is a new settlement Agent (Customer Notification Agent) the correct mechanism to enact meter splitting?
  - This is one viable option and should be considered alongside extending the Data Collector role and potentially the Data Communications Company (DCC).

There were concerns about the impact multiple Supplier arrangements could have on the default Supplier's Imbalance position. It was agreed that Primary and all Secondary Suppliers would be treated equitably under any proposed arrangements.

The main outcomes were that there are potential solutions for progressing P379. The Workgroup needs clarification on the different areas discussed. It was agreed that the Proposer should clarify what the current proposal is. It is important that the proposal is clear to the group so they can determine how to best progress the change.

The Workgroup advised that the Proposed Modification timetable may need to be revised based on the time it will take to develop the solution.

#### Meeting 2 – 3 April 2019

Given questions raised at the first meeting, the objective of the second P379 meeting was to clarify the P379 issue and scope and to start assessing use cases put forward to help develop the P379 solution.

The Workgroup discussed potential solutions for use case 1 including views on the pros and cons of each solution.

The main outcomes from the meeting are summarised below:

- The Workgroup will need to look at the Party Agent role governance process
- The P375 Half Hourly Data Collector (HHDC) solution is similar to the proposed P379 solution in that the HHDC and Party Agent role will have similar roles. The Workgroup is to monitor the progression of P375.
- There should be clarification on what happens if a customer opts out of HH settlement with Primary Supplier.
- The Workgroup is to further discuss the use case considering how Exempt Suppliers forecast what they are going to generate so they are exposed to imbalance costs.

- ELEXON took a number of actions to clarify key elements of the proposed solution.

Ofgem presented the initial scope of review on Network Access and forward looking charges. The Workgroup will need to consider Ofgem's reform of network access and forward looking charges as part of the P379 solution.

### **Meeting 3 – 18 April 2019**

The objective of the third P379 Workgroup meeting was to discuss the exempt Supply use case.

Ofgem presented on the exempt Supply framework and how this works within the current market. In addition ELEXON provided an overview of the existing options for non-licensed entities selling power over the Distribution Network Operator's (DNO) network and how the P379 solution could potentially work.

The Workgroup considered how multiple Supplier arrangements could work with the current exempt supply requirements. It was agreed that with P379 arrangements should be carried out under BSC Governance. The Meter-splitting process should be codified, looking at how volume split is dealt with at the Boundary Meter. P379 is wide in scope, the solution is not limited to use cases. Also the 379 solution should be able to deal with complicated arrangements.

### **Meeting 4 – 21 May 2019**

The objective of the fourth P379 Workgroup meeting was to address concerns about balance responsibility raised during the first Workgroup meeting. Also, to agree content of the P379 Interim Assessment Report and updated progression plan.

The Workgroup considered use case 2 (exempt supply) looking at how the Secondary Supplier role will be enabled by the proposed Party Agent role. The Secondary Supplier has to be able to supply to premises under the Electricity Act with capability to trade that volume. At a minimum it should be either a Trading Party under the BSC or a licensed Supplier (in which case it will also be a Trading Party).

The Workgroup considered potential options for dealing with balance responsibility. It was agreed that there should be a mechanism to facilitate arrangements. The key is to clarify the Party Agent Role. Also involved Suppliers can put in place a mechanism to deal with risks to these arrangements.

The next meeting will further look at balance responsibility and the new proposed Party Agent Role.

## **Key Discussions**

### **Scope of P379 Solution**

The P379 solution should enable multiple suppliers to supply at a single meter without needing a prior agreement. The Workgroup will consider how the proposed solution could impact a number of BSC arrangements including (but not limited to):

- Party roles and responsibilities – supplier responsibilities and processes

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- Metering – interactions with current shared metering arrangements including consumption at the meter.
- Volume allocation – calculating the right volumes between Parties.
- Funds administration – cash\_flow and payments
- Performance assurance – assurance processes that Parties will be subject to

Initial P379 discussions have focused on how potential solutions could work under the above BSC arrangements. The preferred solution should achieve the outcome without requiring agreement between Suppliers for settlement purposes. It should allow for:

- The creation of a Party Agent role
- Interaction with the proposed P375 HHDC solution
- Facilitation under BSC processes

The Proposer contends that P379 arrangements primarily intends to rationalise and simplify existing arrangements, with the main purpose of enabling new markets for behind-the-meter supply. The key issue is how the current regime affects the ability of a consumer to enter into multiple relationships. To ensure efficiency the P379 solution will be tested against the modification objectives.

Ofgem has observed many barriers to competition for behind-the-meter energy volumes<sup>2</sup> hence their support for the [ELEXON white paper](#) relating to P379. Ofgem expect a much more diverse market in the future. P379 will also allow the Workgroup to discuss issues facing the market.

### **Use cases to develop P379 solution**

The Workgroup agreed to assess the P379 against a set of use cases. This approach would help understanding and enable the solution to be built and tested from a simple use case up to more complex use cases.

Looking at different multiple supplier scenarios will be useful for solution development and decision making. Simple and Complex use cases will:

- Ensure the process works
- Establish impacts on each party in the scenario
- Identify interactions and potential unintended consequences

The Workgroup is considering a number of different use cases including the below scenario where a customer purchases an EV from an EV company with bundled power when charging at home.

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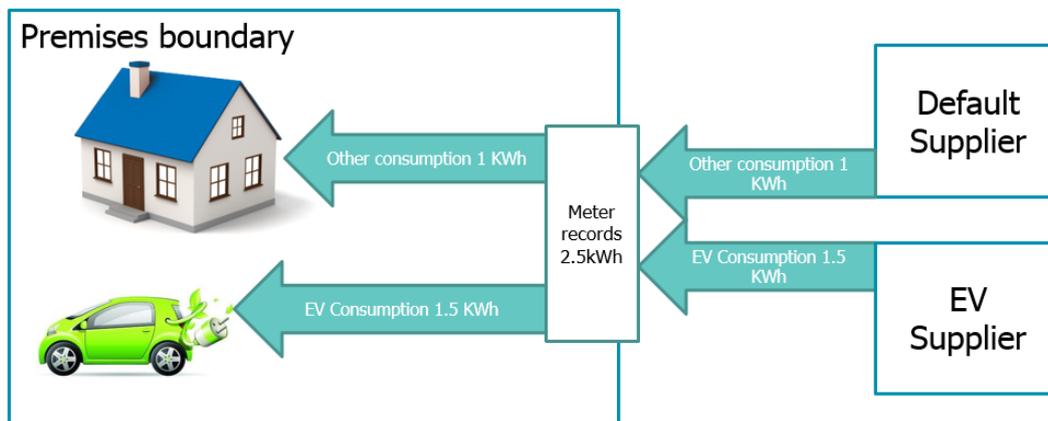
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<sup>2</sup> [Dermot Nolan's speech at the 2017 EnergyUK Annual Conference](#)



Looking at use cases will ensure that interactions between involved Parties are clearly defined, and show how notification processes will work within BSC arrangements.

It should be noted that the P379 solution is wide in scope and not limited to these the use cases considered in the Workgroup. The solution should be able to deal with complicated arrangements.

### Proposed Party Agent Role

Currently meter-splitting arrangements between Suppliers are facilitated by [BSCP550](#)<sup>3</sup>. The BSC does not allow for the splitting of meter volumes supplied by two or more Suppliers though a single meter without the concerned Suppliers having to enter into an agreement with each other. All involved Suppliers enter into the agreement, and existing Suppliers retain a veto over new Suppliers entering the arrangement. Additionally, all Suppliers involved must use the same Party Agents, and meter volumes can only be split based on schedules submitted in advance or on behind-the-meter meter readings.

The market is now seeing a number of business models where shares of energy cannot be predicted in advance, replicating what is currently possible using behind the meter generation and private networks. Additionally, new technology is increasing the viability of types of licence exempt supply which currently lacks a route to market. As such the current SVA Shared Metering Arrangements are not fit for these scenarios.

The new Party Agents will work on behalf each Secondary Supplier. It would be a competitive role performed a relevant service providers. The solution will determine the governance of the Party Agent within BSC arrangements and the functions they should perform.

The proposed solution will clarify whether it will be a Party Agent, central Agent or a BSC Party. The Proposer notes that the CNA and HHDC roles are not very different where Secondary Supplier is to a specific meter point, however the Party role is different in cases such as peer-to-peer trading or community energy. The primary supplier will have the choice of whether it appoints its own party agent. Where it does not the choice should rest with the secondary supplier. The Workgroup agrees that:

- The CNA enabled solution addresses all aspects of the issue statement, but requires the most change to facilitate.

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<sup>3</sup> Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy

- The CNA enabled solutions allows multiple supply to be enacted with purely vertical relationships between customer and settlement – no horizontal arrangements between suppliers are necessary for settlement purposes.
- There is no limit to the number of suppliers that this solution could enable at a meter.
- Customers can switch their Primary Supplier without impacting on any other arrangements at the meter. Volumes allocated to Secondary Suppliers are notified is facilitated by the CNA, which is independent of a customer's Primary Supplier. Therefore, continued relationships between a customer and a Secondary Supplier are not dependent on any switching process.

During discussions the Proposer clarified that all Settlement Meters will continue to be registered to a single Party they are registered with. The idea is to maintain the existing Supplier as Meter registrant. Any change will be at the premises level, behind-the-meter. The group agreed to use the terms 'Primary' and 'Secondary' supplier rather than 'default' supplier to describe the roles being performed.

## Proposed via P375

It is envisaged that the proposed P375 solution, which is still under development, may introduce procedures for HHDCs to collect data from behind-the-meter measuring devices and submit the data into settlement. Similar to the proposed solution the P375 HHDC would work on behalf of the Secondary Supplier, and would not necessarily be the same as the HHDC of the Primary Supplier. As mechanistically the P375 HHDC solution is the same as the CNA solution, but relies on a different agent, it delivers against the problem statement in the same way.

It is expected that under P375 there would be pseudo accounts to allow for agent appointment to behind-the-meter Meters. These new Meter types will have similar DC processes to boundary Meters. P375 could be described as taking existing processes and rolling out to behind-the-meter Meters. The P379 solution could seek to leverage this in the case of asset-linked Secondary Supply. However, this solution presumes the outcome of P375, and does not work to enable use cases such as peer-to-peer trading or community energy supply.

The Workgroup is monitoring the development of the P375 solution and the assessment timelines, should the P379 solution need to align with P375.

## Other areas not within scope of P379 Proposed

The Workgroup also considered the following solutions for multiple Supplier arrangements:

### 1. Shared SVA Metering arrangement

Under this option calculation of the split is done by the HHDC, who then provides data to settlement via the normal data flows. Each Supplier will be required to register a 'pseudo-Secondary' MSID against the property, to which their volumes are assigned.

The Workgroup believes that Shared SVA arrangements will not work under the proposed solution because Suppliers will still be required to have bilateral arrangements with each other. P379 is proposing to remove the need for those bilateral agreements. This option would require participants to use the same HHDA/HHDC.

Once bilateral agreements have been established, the Shared SVA meter arrangements deliver the desired outcomes, but would need changing for the exempt Supply use case to facilitate splitting based on volumes purchased from another supplier in near to real time.

## 2. Difference Metering

Under deference metering the volumes from one meter located within the private network are subtracted from the volumes at the boundary meter, so that volumes can be correctly allocated in settlement. The Half Hourly Meter Operator Agent (HHMOA) would identify the site as complex, and provides the HHDC with the necessary information to carry out the differencing.

Although this option is facilitated under existing BSCP514, it is not effective where Supply is split based on something other than an asset behind the Meter. It also requires Suppliers to have bilateral agreements and agree to use the same agents.

## Impact on exempt Supply requirements

The Workgroup raised concerns about the existing options for licence exempt entities selling power over the Distribution Network Operator's (DNO) network and how this could impact the P379 solution. Ofgem has been involved in all Workgroup discussions and volunteered to present on current exempt supply arrangements.

Exempt supply obligations are found in the Electricity (Class Exemptions from the Requirement for a Licence) Order 2001, which was designed to minimise the burden of regulation on persons operating in a limited manner in the generation, supply and distribution of electricity. The order covers:

- Separate Schedules for generation, distribution and supply, each of which includes a number of different Classes of exemption.
- Who and What is exemptible and the classes of exempt supply
- limited obligations on licence exempt Suppliers but it should be noted that licence exempt is not the same as unregulated
- Requirements to comply with codes when supplying over the public network

Under current arrangements licence exempt supply requires the following:

- a Third Party Licenced Supplier(TPLS),
- a bilateral agreement with each customer,
- that the customer's additional energy is supplied by the TPLS with whom the generator has an agreement – the customer has no access to the competitive market for these volumes.

Changing exempt supply arrangements will mean licence or policy changes. It has been agreed that that licence changes are outside the P379 solution and should be dealt with separately. However, recommendations from this Modification can be passed to Ofgem and BEIS<sup>4</sup> for consideration. This is subject to how the P379 discussions progress and if this can be fed into the Ofgem and BEIS review of Future of Retail Markets.

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Under the proposed P379 solution there may still be a need for an agreement between an exempt supplier and a BSC Party (a Third Party Licenced Supplier) to provide some top-up energy to the customer in certain circumstances.

The Workgroup should consider also how battery storage interacts with supply licence exemptions. This is likely to be in the form of a complex use case, against which the P379 solution will be tested.

## Balance Responsibility

The proposed multiple Supplier arrangements will impact balance responsibility assignment under the BSC. Where a customer chooses a volume of their supply to be provided by a different supplier, it should be clear which supplier is responsible for an imbalance volume. Under current arrangements imbalance manifests as the difference between allocated volume<sup>5</sup> and final position<sup>6</sup>. During initial discussions the Workgroup raised two key questions:

- If two or more suppliers provide energy to a premises which supplier is responsible for which volumes?
- Which assets have what impacts on each supplier's energy accounts?

Balance responsibility should be determined for the Primary Supplier and Secondary Supplier. For the purposes of the P379 use cases the Primary Supplier is the registrant of the Boundary Meter and a Secondary Supplier is not a registrant of a Boundary Meter. The Secondary Supplier role will be enabled by the proposed Party Agent role. The Secondary Supplier has to be able to supply to premises under the Electricity Act with capability to trade that volume. At a minimum it should be either a Trading Party under the BSC or a licenced Supplier (in which case it will also be a Trading Party).

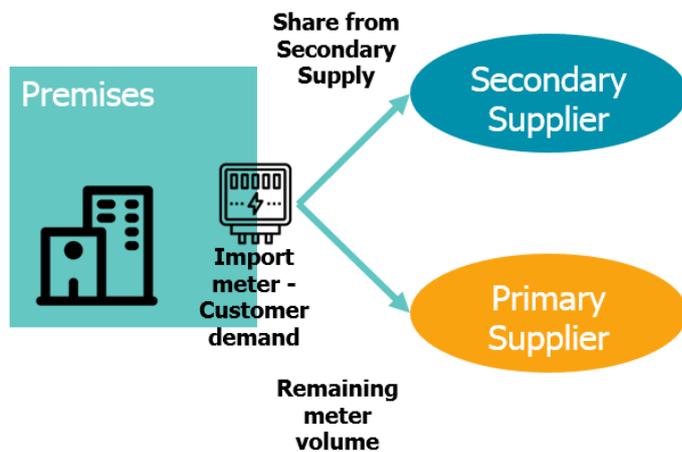
The solution must address the issue of balance responsibility in line with European Balancing Guidelines (EBGL). The EBGL define a 'balance responsible party' (BRP) as 'a market participant or its chosen representative responsible for its imbalances'.

While considering potential models for determining balance responsibility the Workgroup discussed the below use case where customers are buying volumes from a Secondary Supplier without that volume being linked to an asset behind the meter.

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<sup>5</sup> equivalent to a Party's Metered Volume, net of any MVRNs

<sup>6</sup> equivalent to a Party's contracted position, the sum of their ECVNs



The Workgroup considered the below features of the use case:

- Metered volumes assigned to a Secondary Supplier based on an amount (either a kWh volume or percentage of customer consumption) agreed between the customer and that supplier
- Customer consumption varying from an amount purchased from a Secondary Supplier
- Secondary Suppliers operating under a Class A exemption, and therefore unable to supply energy they did not generate themselves (generation varying from the amount purchased by a customers).

The group considered potential solutions raising the below points:

- The P379 solution should not restrict options and contain a degree of flexibility including Time of Use.
- Liabilities are on the Primary Suppliers. The primary Supplier might not want to be involved in the arrangements if they are providing minimal volumes.
- What happens if the customer purchases more units? There should be a process to avoid the customer buying more than 100%. The metered volumes cannot be in excess of 100%. However, traded volume could exceed what is at the Boundary Meter. This will be addressed in a future Workgroup.
- The proposed solution could result in the Primary Supplier increasing fixed charges and the customer picking up the costs. Licence changes would be required if this were to occur during a fixed contract.
- The issue of what happens to bought but unused units should be considered under commercial arrangements. An option could be for energy to be left in the account of the Secondary Supplier, who will be exposed to imbalance for that energy.
- Notifying the Primary Supplier of energy supplied by the Secondary Suppliers will allow the Primary Supplier to manage their position, but also to learn about the customer. The process of notifying a Primary Supplier may affect the CNA function, depending on how the notifications are implemented.

The Proposer believes that:

- It's key to keep the community scheme example in consideration, looking at the nature of supply the customer wants.
- P379 should be creating optionality, not foreclosing potential uses of the arrangements.

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- The Workgroup should avoid complicating the P379 issue. It's important that the solution works in the current market and is future proofed. Ofgem acknowledge there are likely consequential impacts from P379 and welcome WG recommendations for consideration under other industry arrangements.
- Balance responsibility is applied at a high level, within a single bidding zone/ imbalance price area, which under the current Great Britain (GB) rules is expressed in effect as a national balancing point, in a system that is rife with approximations (use of profiles, smear back of Grid Supply Point (GSP), GSP Group Correction Factors etc).
- Under the proposed solution, for customers to participate they would need to install a HH meter and all active suppliers would have access to more accurate and granular information that should take across the system as a whole to enable them to better manage risk, where, of course, they elect to hedge and/or adjust their positions.

As directed in the Terms of Reference the Workgroup is to consider the data that should be made publically available in an accessible manner to interested Parties and third parties.

## Policy and Regulatory Considerations

Depending on the solution developed by the P379 Proposer and Workgroup, there may be cross-Code impacts on the MRA, DCUSA, CUSC and Grid Code. During the development of the solution, where impacts arise, ELEXON will engage with the appropriate Code Administrators to ensure that cross-Code impacts can be addressed, ensuring the timely delivery of the solution to this Modification. The Proposer agrees that where required changes will be raised to facilitate the P379 solution.

The Workgroup has agreed that considerations on policy and licence are outside of the P379 solution and should be dealt with separately. However, recommendations from this Modification can be passed to Ofgem and BEIS for consideration. This is subject to how the P379 discussions progress and if this can be fed into the Ofgem and BEIS review of Future of Retail Markets.

The Workgroup is maintaining a Policy and Regulatory Log capturing potential cross code and impacts and policy considerations. The P379 Policy and Regulatory Log is provided as Attachment A.

## 6 Proposed Progression

In this section we detail the areas which the Workgroup believe should be considered at subsequent Workgroup meetings and the proposed new P379 progression plan.

### Areas to consider

The table below summarises the significant areas the Workgroup believes it should consider in subsequent Workgroup meetings.

Areas to Consider in line with Terms of Reference	Topics to be considered by Workgroup
<ul style="list-style-type: none"> <li>The scope of the Customer Notification Agent (CNA) role</li> <li>Consider the data that should be made publically available in an accessible manner to interested Parties and third parties</li> </ul>	What is the scope of the Customer Notification Agent role?
<ul style="list-style-type: none"> <li>Whether NHH Meters should be included within the solution alongside HH Meters</li> <li>Interactions with the current shared metering arrangements under the BSC</li> </ul>	Metering arrangements
<ul style="list-style-type: none"> <li>Allocation of Metering System charges and responsibility for Metering System costs</li> </ul>	Impact to network charging
<ul style="list-style-type: none"> <li>Assess any potential impacts on the accuracy of Settlement</li> <li>The methodology to be used for allocating volumes between Trading Parties, and the associated costs and benefits of different approaches;</li> </ul>	How will balance responsibility work under the proposed solution?
<ul style="list-style-type: none"> <li>Consider any legal implications of the solution developed, including any necessary contract arrangements between Parties</li> </ul>	What are the legal implications?
<ul style="list-style-type: none"> <li>Appropriate Performance Assurance Techniques for the P379 solution</li> </ul>	How will compliance be monitored?
<ul style="list-style-type: none"> <li>Cross-Code impacts resulting from the solution developed, including impacts on the Supplier Meter Registration Service (SMRS) registration system</li> </ul>	What are the potential cross code impacts?

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## What is the scope of the Customer Notification Agent?

The Workgroup is to consider the scope of Customer Notifications Agent. The proposed P379 solution should clarify how all participant supplier processes will work under BSC arrangements. The creation of a new Party Agent role will reconcile power flows through the Settlement Meter, enabling accurate allocation of volumes and costs. This will enable different suppliers to reflect these volumes in bills and payments to consumers. The Workgroup queried that meter splitting cannot work in the case of licence exempt. The Secondary Supplier role will be enabled by the proposed Customer Notification Agent (CNA) role.

The CNA role will be clearly defined to show how it will operate within BSC arrangements. The Workgroup is to clarify the nature of the CNA looking at:

- Whether it will be a party agent and/signatory to the BSC
- The methodology to be used for allocating volumes
- The associated costs and benefits of different approaches
- Supplier roles and responsibilities
- Performance assurance - The CNA governance process

## Metering arrangements

It is important to ensure that the BSC metering processes can facilitate the proposed arrangements. The SVA Shared Metering arrangements were designed for use at large, non-domestic sites. They may not offer a viable solution in terms of facilitating multiple Suppliers (including peer-to-peer trading) or use in the domestic or smaller commercial sectors. The focus is on smaller sites that do not currently have an arrangement for allowing innovative Supplier services around the meter. The Proposer clarified that they accept NHH being out of scope, and that the proposals could serve as an incentive on the uptake of HH capable meters. There will need to be a Secondary process to allocate charges on Settlement Meters. Metering considerations will include the below areas (but not limited to):

- Settlement mechanism for multiple Suppliers
- Allocation of Metering System charges and responsibility for Metering System costs;
- how P375 interacts with or enables the P379 solution
- Interactions with the current shared metering arrangements under the BSC;
- Whether NHH Meters should be included within the solution alongside HH Meters
- How export volumes should be treated at the Boundary Point;
- Participating meter types
- Consider how Parties will obtain/provide meter data (energy consumption at the meter)
- How prepay meters will work under proposed solution

## Impact to Network Charging

The proposed solution will allow multiple Suppliers to provide energy to a premises. The allocation of Metering System charges and responsibility for Metering System costs should be considered. The Workgroup should clarify who is responsible for paying use of system charges. The initial view is for each Supplier to pay their own volumetric charges, with the Primary Supplier responsible for passing through capacity-based charges. This could depend on the premises arrangements.

Unless changes are raised in other codes, network charges will stay with the primary Supplier. It was suggested that there is no reason for the charges to stay with Primary Supplier. There should be appropriate allocation of charges based on the actual volumes each party is responsible for supplying. The Proposer has indicated he would be willing to raise these changes.

The Proposer notes that changes on other codes i.e. [DCUSA](#) and [CUSC](#) code will be raised if required as part P379 solution. The aim is to develop multiple supply arrangements with the right level of charges (including indirect) allocated to an entity.

## How will balance responsibility work under the proposed solution?

The Workgroup is to address questions raised during balance responsibility discussions. This should include:

- Clarification on exempt supply licence and exempt generation licence. What are the party requirements under the BSC?
- Whether an exempt Supplier would be a BSC Party with BM units?
- Define what is meant by the term '*customer*'
- Define the terms '*Primary Supplier*' and '*Secondary Supplier*'
- Whether the function will be performed through the Party Agent role
- Clarify Class A requirements. Class A exempt supply does not allow parties to sale more than generated

## What are the Legal Implications?

There may be impacts to current legislation and BSC obligations as a result of the proposed P379 solution. The term supply will need to be clearly defined in the context of the P379 solution. In addition, consideration will need to be given as to whether there may be incompatibility with the provisions of the [Electricity Act Electricity Act 1989 or other sectoral legislation](#). The mechanism should work irrespective of whether the supplier is licenced or not. The group will need to work out how obligations will work between suppliers.

The Workgroup will look at how Class A licence exempt suppliers should be treated under the BSC to deliver the intent of P379, clarifying requirements for licenced and licence exempt suppliers. Also, there could be customer protection issues when looking at obligations.

The Workgroups legal consideration will include the below items (but not limited to):

- Any legal implications of the solution developed, including any necessary contract arrangements between Parties
- The risk-benefit analysis of the solution developed through an industry impact assessment
- The consumer experience from the solution developed
- Multilateral contractual arrangements
- Legal requirements for licenced and licence exempt suppliers

### **How will compliance be monitored?**

In line with current BSC arrangements the CNA Party Agent role will be subject to a Performance Assurance regime to ensure errors are detected and corrected. P379 arrangements will be carried out under BSC Governance. The P379 framework has to address:

- Appropriate Performance Assurance Techniques for the P379 solution; and
- Assess any potential impacts on the accuracy of Settlement.

### **Interactions with other BSC Modifications**

This Modification interacts with [P344 'Project TERRE implementation into the GB market arrangements'](#) (to be implemented in February 2019), [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#) (currently under assessment), [P376 'Utilising a Baseline Methodology to Set Physical Notifications for Settlement of Applicable Balancing Services'](#) (currently under assessment) and also with Ofgem's reform of the future retail markets, including the Supplier Hub principle.

Interactions with these ongoing work streams should be considered through the assessment of the solution of this Modification Proposal.

### **Other Workgroup Considerations**

The Workgroup will also consider:

- Risks associated with P379
- Changes needed to BSC documents, systems and processes to support P379 and what are the related costs and lead times
- If there are any alternative Modifications
- Where P379 better facilitates the Applicable BSC Objectives compared with the current baseline

### Next steps

The P379 Workgroup recommends that P379 should continue to be progressed through the Assessment Procedure, so that it can consider the further areas set out in Section 6

### Workgroup membership

The P379 Workgroup has benefitted from a high level of industry participation and two Ofgem presentations to help with Workgroup discussions. An average of 30 participants have attended each the four P379 meetings to date. This includes Suppliers, Generators, Distribution Network Operators (DNO), trade bodies, meter manufacturers, Party Agents and smart and local energy companies. Continuous participation will ensure most of the impacted Party types and industry experts are represented in the development of the solution.

### Further progression timetable for P379

Given the productive debates during the initial meetings the Workgroup recommends that the P379 Assessment Procedure be extended by six months to allow more time to develop the solution. The Workgroup recommends that P379 undergoes a further ten months Assessment Procedure, with the Assessment Report being presented to the Panel at its meeting on 12 March 2020. Consequently, we invite the Panel to approve a six-month extension to the P379 Assessment Procedure, returning with the Assessment Report to the March 2020 Panel meeting.

We also recommend that an update is provided in six months at the December 2019 Panel meeting on the progress of P379. Under the proposed new timetable the Assessment Procedure Consultation will be issued around this time.

The Workgroup will need to undertake the activities shown in the table below, which includes a 15 WD Assessment Procedure Consultation. It also includes a 15 WD window to carry out an impact assessment with BSC Agents as well as produce the legal text.

The Workgroup agreed that wherever possible, so long as there was no detriment to the progression of P379, that P379 should be progressed in accordance with the proposed timetable.

The Workgroup's recommended the updated progression plan set out below.

P379 Assessment Timetable		
Event	Agreed Dates	Proposed Dates
Initial Written Assessment Presented to Panel	10 January 2019	10 January 2019
Initial consideration by Workgroup WG1 - Workgroup Views	27 February 2019	27 February 2019
Further consideration by Workgroup – WG2 - Use Case 1 (Electric Vehicle)	3 April 2019	3 April 2019
Further consideration by Workgroup	18 April 2019	18 April 2019

WG3 - Use Case 2 – Exempt supply		
Further consideration by Workgroup WG4 - Recap and Balance Responsibility	W/C 13 May 2019	21 May 2019
Interim Report to Panel	13 June 2019	13 June 2019
WG5 – Balance Responsibility and Party Agent Role		WC 17 June 2019
WG6 – Metering		WC 8 July 2019
WG7 – Performance Assurance		WC 29 July 2019
WG8 – Business Requirements		WC 12 August 2019
WG9 – Legal Text Review		WC 9 September 2019
WG10 – Review Impact Assessment Results		WC 28 October 2019
Assessment Procedure Consultation	1 July 2019 – 19 July 2019 (15WD)	9 December – 7 January 2020 (15WD) (WG to decide if longer period required)
WG11 – Consider Consultation responses	W/C 29 July 2019	WC 20 January 2020
Workgroup Report presented to Panel	12 September 2019	12 March 2020
Report Phase Consultation	16 September 2019 – 27 September 2019 (10WD)	16 March 2020 – 27 March 2020 (10WD)
Draft Modification Report presented to Panel	10 October 2019	09 April 2020
Final Modification Report submitted to Authority	16 October 2019	15 April 2020
Targeted BSC Release	April 2020 (subject to Assessment of Modification and associated delivery timescales through impact assessment)	November 2020 (subject to Assessment of Modification and associated delivery timescales through impact assessment)

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## 8 Recommendations

The P379 Workgroup invites the Panel to:

- **APPROVE** a six month extension to the P379 Assessment Procedure;
- **AGREE** the proposed Assessment Procedure timetable; and
- **NOTE** the content of this P379 interim report.

### Assessment Procedure timetable

P379 Assessment Timetable	
Event	Date
Panel submits P379 to Assessment Procedure	10 January 2019
Workgroup Meeting 1	27 February 2019
Workgroup Meeting 2	3 April 2019
Workgroup Meeting 3	18 April 2019
Workgroup Meeting 4	21 May 2019
Panel considers Workgroup's Interim Assessment Report	13 June 2019

## Workgroup membership and attendance

P379 Workgroup Attendance					
Name	Organisation	27 Feb 2019	3 April 2019	18 April 2019	21 May 2019
<b>Members</b>					
Lawrence Jones	ELEXON ( <i>Chair</i> )	✓	✓	✗	✓
Elliott Harper	ELEXON ( <i>Chair</i> )	✗	✗	✓	✗
Fungai Madzivadondo	ELEXON ( <i>Lead Analyst</i> )	✓	✓	✓	✓
Peter Frampton	ELEXON ( <i>Design Authority</i> )	✓	✓	✓	✓
John Lucas	ELEXON	✓	✓	✓	✓
Iain Nicoll	ELEXON	✗	✗	✗	✗
Shamaila Jawaid	ELEXON	✗	✓	☎	✗
Aditi Tulpule	ELEXON ( <i>Lead Lawyer</i> )	✓	✓	✗	✓
Scott Laczay	Ofgem	✓	✗	✗	✗
George Daniel	Ofgem	✓	✓	✗	✓
Kevin Baillie	Ofgem	✓	✓	✓	✓
Beth Hanna	Ofgem	✗	✓	✗	✗
Nigel Cornwall	New Anglia Energy ( <i>Proposer</i> )	✗	☎	☎	✓
Dan Starman	Pixie Energy ( <i>Proposer Representative</i> )	✓	✓	✗	☎
Ken Mcrae	Pixie Energy ( <i>Proposer Representative</i> )	✓	✗	✗	✗
Stuart Leaver	Pixie Energy	✗	✗	☎	✗
Chris Welby	Bristol Energy	✗	✗	✗	✗
Terry Carr	E.ON Energy	✓	✓	☎	✓
Lee Stone	E.ON Energy	✓	✓	✗	✓
Philip Pearson	Energy Pool	✗	✓	✗	✗
Ian Hall	IMServ	✓	✓	☎	✓
Richard Vernon	Npower	✓	✗	✗	✗
Paul Bedford	Opus Energy	✓	✓	☎	✓
Oliver Xing	Orsted	✗	✓	✗	✗
Bill Reed	RWE Supply & Trading GmbH	✓	✓	☎	✓
Dermot Hearty	Salient Systems Ltd	✓	✓	☎	✓
Colin Prestwich	Smartest Energy	✓	✓	✗	✓
Andy Colley	SSE	☎	☎	☎	✓
James Murphy	Stark	✗	✗	✗	✓

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P379 Workgroup Attendance					
Name	Organisation	27 Feb 2019	3 April 2019	18 April 2019	21 May 2019
Rick Parfett	The ADE	✓	✗	✓	✓
Aaron Dickinson	Utiligroup	☎	✓	☎	✗
Phil Russell	Consultant	✓	✓	✓	✓
Reg Platt	EMRGNT	✓	✓	✗	✓
Harriet Harmon	National Grid ESO	✓	✓	✗	✗
Colin Frier	Siemens	✓	✓	☎	✓
Tom Chevalier	The Association of Meter Operators	✗	✗	✗	✗
Robert Langdon	SMS plc	✗	☎	☎	✗
Ken McRae	Pixie Energy (Proposer Representative )	✓	✗	✗	✗
Andy Knowles	Utilita	✓	✓	✗	✗
Donna Townsend	ESP Electricity Ltd	✓	✗	✗	✗
Lindsay Biginton	Utilita	✓	✓	✗	☎
Peter Capener	Bath and West Community Energy	✗	✗	✗	✗
Simon Proctor	Bristol Energy	✗	✗	✗	✗
Tabish Khan	Centrica	✓	☎	✓	✓
Kevin Mcdonald	EDF Energy	✗	✗	✗	✗
Binoy Dharsi	EDF Energy	✓	✓	✓	✓
Simon Lord	Engie	✗	✗	✗	✗
Phil Broom	Engie	✗	✗	✗	✗
Nick Woolley	EV.Energy	✗	✗	✗	✗
Eamonn Bell	GridBeyond	✓	✗	✓	✓
Tom Abson	Kiwi Power	✗	✗	✗	✗
Mark Earthey	Maitland Energy Consulting Ltd	✗	☎	✗	✗
Tereza Borges	n3rgy ltd	✓	✓	✓	✓
Chris Trigg	OnGen Ltd	✗	☎	✗	✗
Julius Baghdadi	Pulmo	✗	✗	✗	✗
Abhishek Jain	Reactive Technologies	☎	✗	✗	✗
Kevin Lewis	Serve UK	✗	✗	✓	✓
Matt Howard	Siemens	✗	✗	✗	✗
Lee Francis	SMS plc	✗	✗	☎	☎
Kristina Leary	SMS plc	✗	✗	✗	✗

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P379 Workgroup Attendance					
Name	Organisation	27 Feb 2019	3 April 2019	18 April 2019	21 May 2019
Caroline Pitt	Squeaky Energy	x	x	x	x
Will Vooght	Tonik Energy	x	x	x	x
Steve Springett	Tonik Energy	x	x	x	x
Anthony Waite	Upside Energy Ltd	x	x	x	x
Andrew Turner	Engie	✓	☎	☎	☎
Guy Shalev	BUUK Infrastructure	☎	☎	✓	✓
Daire Kelly	Smart DCC	✓	x	x	x
Felix Wight	Repowering London	x	x	x	x
Rajvant Nijjhar	BankEnergi & Innovate Uk	✓	✓	✓	✓
Prudence Mauthoor	Matrica	✓	x	x	x
Natasha Knight	Matrica	✓	☎	✓	✓
Elena Dragomir	Matrica	x	x	x	x
Lynne Hargrave	Calvin Capital Ltd	✓	☎	☎	☎
Paul Fuller	ESB Energy	x	x	x	x
Helen Stack	Centrica	x	x	x	x
Pam Liu	Intellicharge Limited	☎	☎	x	x
Peter Dennis	Ecotricity	x	x	x	x
Paul Farmer	First Utility	✓	☎	✓	✓
Rachael Anderson	Utilita	x	x	x	x
Helen Knowles	SmartestEnergy	x	x	x	x
George Bartley	BankEnergi & Innovate Uk	✓	☎	x	x
Ian Bryne	BankEnergi & Innovate Uk	x	✓	✓	✓
Vijay Natarajan	Qbots Energy Ltd	✓	☎	✓	✓
James Griffiths	The ADE	✓	x	x	x
Calvin Dillionburns	BankEnergi & Innovate Uk	x	☎	x	x
Patrick Doyle	BankEnergi & Innovate Uk	x	✓	x	x
Thomas Clarke	Verv Energy	x	x	x	✓
Elizabeth Allkins	Ovo Energy	x	x	x	x
Megan Coventry	SSE	x	x	x	x

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### P379 Workgroup Attendance

Name	Organisation	27 Feb 2019	3 April 2019	18 April 2019	21 May 2019
Lizzy Roberts	Ovo energy	x	x	x	✓
James Strickland	Verv Energy	x	x	x	✓
William Goldsmith	EV Energy	x	x	x	✓

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## Appendix 2: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code ( <i>Industry Code</i> )
BSCP	Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> )
DCUSA	Distribution Connection Use of System Agreement ( <i>Industry Code</i> )
CUSC	Connection and Use of System Code ( <i>Industry Code</i> )
MRA	Master Registration Agreement ( <i>Industry Code</i> )
BSCCo	The Balancing and Settlement Code Company ( <i>Code Administrator</i> )
BEIS	the Department for Business, Energy and Industrial Strategy ( <i>Government department</i> )
BM	Balancing Mechanism
GB	Great Britain
GSP	Grid Supply Point
HHDC	Half Hourly Data Collector
ESO	Electricity System Operator
EBGL	European Guideline on Electricity Balancing ( <i>legally binding European law, subject to "Brexit" negotiations</i> )
TPLS	Third Part Licenced Supplier
VLP	Virtual Lead Party
HHMOA	Half Hourly Meter Operator Agent
CNA	Customer Notification Agent

## Glossary

P379 specific glossary used in this document is listed in the table below.

Glossary	
Primary Supplier	The registrant of the import meter at a premises. May also be Primary Export Supplier if export meter registrant. Responsible for Supply of any volumes to a customer not provided by another Supplier
Secondary Supplier	A Supplier that has contracted with a customer to provide them with some amount of energy, not linked to their Primary Supplier
Customer	The occupant of a premises or an intermediary appointed by them to act on their behalf
Exempt Supplier	A Supplier supplying power to a customer under the terms of a Supply Licence Exemption (particularly a Class A exemption for exempt supply over public wires)
Use case 1 (UC1)	Secondary Supply to a specific consumption asset
Use case 2 (UC2)	Secondary Supply based on an amount agreed with the customer

## External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
4	P376 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p376/">https://www.elexon.co.uk/mod-proposal/p376/</a>
8	ELEXON White Paper on the ELEXON website	<a href="https://www.elexon.co.uk/news/elexon-white-paper-enabling-customers-buy-power-multiple-providers/">https://www.elexon.co.uk/news/elexon-white-paper-enabling-customers-buy-power-multiple-providers/</a>
9	BSCP550 page on the ELEXON website	<a href="https://www.elexon.co.uk/csd/bscp550-shared-sva-meter-arrangement-of-half-hourly-import-and-export-active-energy/">https://www.elexon.co.uk/csd/bscp550-shared-sva-meter-arrangement-of-half-hourly-import-and-export-active-energy/</a>
16	Electricity Act Website	
16	DCUSA Website	<a href="https://www.dcusa.co.uk/SitePages/Home.aspx">https://www.dcusa.co.uk/SitePages/Home.aspx</a>
16	CUSC website	<a href="https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc">https://www.nationalgrideso.com/codes/connection-and-use-system-code-cusc</a>
17	Electricity Act Website	<a href="https://www.legislation.gov.uk/ukpga/1989/29/contents">https://www.legislation.gov.uk/ukpga/1989/29/contents</a>
17	P344 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p344/">https://www.elexon.co.uk/mod-proposal/p344/</a>
17	P375 page on the ELEXON website	<a href="https://www.elexon.co.uk/mod-proposal/p375/">https://www.elexon.co.uk/mod-proposal/p375/</a>

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