

Public

**P383 'Enhanced
reporting of demand data
to the ETSO to facilitate
CUSC Modifications
CMP280 and CMP281'**

Workgroup 2

11 June 2019

Health & Safety

In case of an emergency

An alarm will sound to alert you. The alarm is tested for fifteen seconds every Wednesday at 9.20am

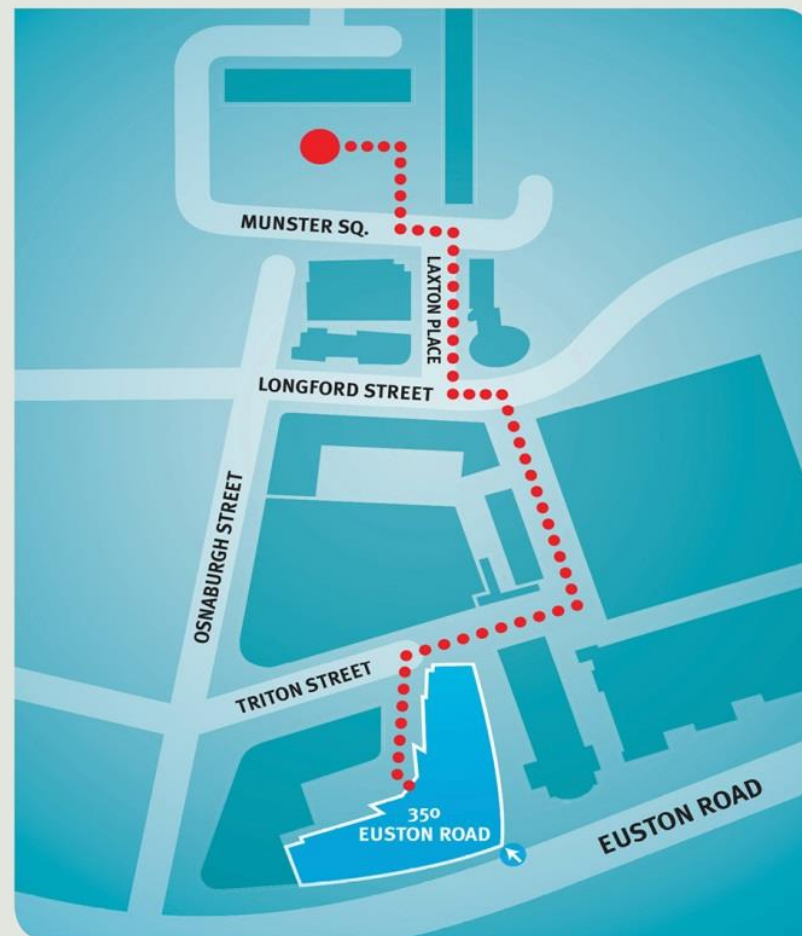
Evacuating 350 Euston Road

- If you discover a fire, operate one of the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you hear the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to the assembly point.
- Please remain with a member of ELEXON staff and await further instructions from a Fire Warden.
- For visitors unable to use stairs, a Fire Warden will guide you to a refuge point and let the fire brigade know where you are.

When evacuating please remember

- Do not use the lifts.
- Do not re-enter the building until the all clear has been given by the Fire Warden or ground floor security.

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Welcome, introduction and meeting objectives

- Recap the solution discussed at the first Workgroup meeting
- Run through the P383 Business Requirements and associated Legal Text
- Discuss the ELEXON P383 Service Provider Impact Assessment response
- Provide initial views (voting) for the Assessment Procedure Consultation
- Agree the next steps for the Modification

Agenda item	Lead
1. Welcome, introduction and meeting objectives	Chair - Elliott Harper
2. Recap of Proposed BSC solution	Nick Rubin
3. Any alternative solutions?	All
4. Business Requirements run through	Nick Rubin
5. Legal Text run through	Nick Rubin & Nick Brown
6. Summary of costs and implementation timescales	Elliott Harper
7. Workgroup Terms of Reference	Elliott Harper
8. Initial Voting <ul style="list-style-type: none">• Implementation Date• Self-Governance• Legal Text• Applicable BSC Objectives	Workgroup
9. Next steps	Elliott Harper
10. Any other business	All



Recap of Proposed BSC solution

Background of defect and CUSC Modifications

Background

- CUSC modification CMP280 and CMP281 were raised in 2017 looking to relieve intermediate consumption of charges related to demand residual, and BSUoS principally for CVA storage facilities (transmission connected storage).
- Following extensive debate by the group the option of including SVA storage facilities with in the scope of the modification has been considered and developed by the group. This is not without its complexity as the contractual routes for SVA storage facility is via its supplier and typically SVA storage facilities are not party of the CUSC.

Defect

- There are two changes required in the BSC to support CUSC Modifications:
 - Aggregation of storage facilities' metered data for network charging purposes; and
 - Provision of assurance for these non- Settlement processes.

Background of defect and CUSC Modifications

Why Change

- This Modification would primarily enable the BSC Panel to provide clarity on how Suppliers, Half Hourly Data Aggregators (HHDAs) and the Supplier Volume Allocation Agent (SVAA) participate in the aggregation and reporting of specific metering systems' metered data for network charging processes, and BSCCo to perform assurance activities in relation to the aggregation of storage facilities' Metering Systems' metered data.

Proposed solution

- A modification of the BSC and a certain number of its Code Subsidiary Documents; and
- Establish appropriate assurance measures.



P383 proposed solution

- The proposed solution comprises the following overall elements:
 - A declaration process
 - Request for and reporting of declared Storage Facilities' HH Metering Systems metered data
 - Aggregation of declared Storage Facilities' metered volumes and reporting of these volumes to the NETSO
 - Assurance measures – upfront validation, and ongoing monitoring and reporting
- This solution only applies to SVA Storage Facilities, whose Imports and Exports are only measured by SVA HH Metering Systems (not unmetered)
 - CVA Storage Facilities must follow processes set out in the CUSC

Proposed BSC Solution – The declaration process

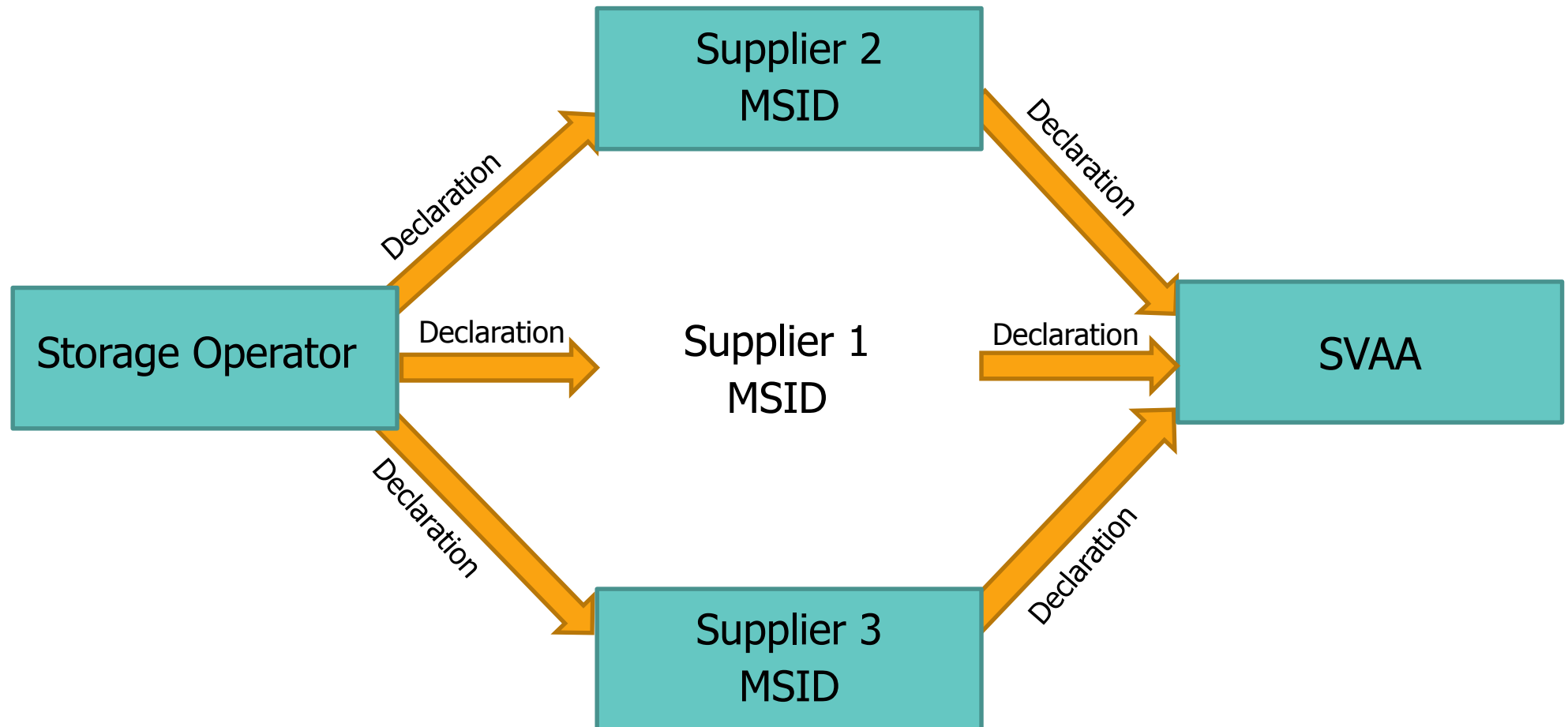
- SVA registered storage facility operator must send its Supplier(s) a director-signed declaration:
 - confirming that the facility complies with the CUSC criteria – see below
 - Containing additional information necessary to support the BSC process
 - Confirms that they are happy for details of the facility to be shared
- Whilst the CUSC criteria have not been finalised, the primary requirements are that an SVA Storage Facility:
 - Is operated by a generation license holder;
 - Has a sole function which is that of 'electricity storage'; and
 - is metered by HH SVA Metering Systems only, which do not measure any other activity except for electricity storage and those activities necessary to support electricity storage at the facility.
- Declaration must also include:
 - Storage Facility Name and address
 - Import and/or Export MSID(s)
 - Registered Supplier
 - Operator's Generation License Number
 - Operator's registered company name
 - Operator Contact Details
 - Director's Name
- A standard declaration template will be defined in BSCP508:
 - the EMRS Director Certificate may provide a model to work from – see [Working Practice 25 - Appendix 4](#).

Proposed BSC Solution – The declaration process

- Where a Storage Facility's Metering Systems are registered by one Supplier only, the operator need only prepare a single declaration.
 - If the storage facility's Metering Systems are registered with more than one Supplier, it must ensure separate declarations are prepared and sent to each Supplier, but that each declaration identifies any related MSIDs.
- In order to register the Storage Facilities, Suppliers must send declarations to SVAA.
 - The Supplier **may** perform its own-validation of the declaration.
- SVAA must check that any declaration is completed properly and that it is valid i.e. that it satisfies the criteria that will be set out in the CUSC in accordance with CMP280 and CMP281.

- Storage operators and Suppliers must notify SVAA of changes to an existing declaration, e.g. update or rescind a declaration

The declaration process



Proposed BSC solution – SVAA obtaining metered volumes



- SVAA uses ECOES to identify HHDA's appointed to Storage Facilities' Metering Systems
- SVAA appoints HHDA's using D0354
- Once appointed the HHDA will report HH Import and/or Export metered data to SVAA using D0385 and according to the prevailing SVAA Settlement Calendar for data aggregation.
- The HHDA will cease to report metered data to SVAA if the MSID(s) it is appointed to are the subject of a change of supplier (CoS) or change of Agent (CoA) event.

Proposed BSC solution – SVAA obtaining metered volumes

Aggregated metered data

- In accordance with the SVAA Settlement Calendar, the SVAA will aggregate the HH Import data reported to it by HHDAs by:
 - Settlement Day
 - Settlement Period
 - Supplier BMU
 - Measurement Class
- the SVAA will calculate distribution losses for these aggregated metered volumes.
- When aggregating metered data, the SVAA will check for MSIDs with missing Imports and Exports investigate missing data and resolve these exceptions

Proposed BSC solution – SVAA providing aggregated metered volumes

- SVAA must report the following to the NETSO via the P0210:

BMU	Explanation	Group
Corrected Period BMU Gross HH Demand	Is its Period BMU Gross HH Demand minus Period BMU Storage Demand	It will be added to the HHB group
Period BMU Gross Storage Demand	Is the sum of gross Imports for successfully declared SVA Storage Facilities	It will be added to the HHB Group
Daily BMU Gross HH Storage Demand		It will be added to the TO3 group

- SVAA must continue to send the P0210 to the NETSO in line with timescales set out in BSCP503
- National Grid accept a standalone report that is not the P0210?

Proposed BSC solution – BSCCo monitoring successful declarations

- The P383 proposed solution will establish ongoing assurance measures (or at least enable the BSC Panel to establish measures)
 - What, if any, specific measures should be specified in the BSC or its CSDs?

- We propose that the following ongoing measures are specified:
 - SVAA should send the BSC Panel a [monthly/ quarterly] report that summarises overall performance of the P383 processes, e.g.
 - the total metered volumes (by Supplier) reported in P0210 – over the reporting period
 - The numbers of declarations submitted, accepted and rejected
 - Details of any exceptions
 - SVAA must, at the request of BSCCo or the BSC Panel, or at least every [6 or 12] months, check the validity of all live declarations, i.e. that they remain compliant with CUSC criteria, carry out any necessary follow up investigation/analysis and report its findings to BSCCo.
 - The Panel upon reviewing any evidence provided by BSCCo may decide to exclude MSIDs from the SVAA's aggregation of Storage Facilities' metered data.
 - SVAA must make P383 data available/accessible to the BSC Panel, BSCCo [and NETSO?].



**Any alternative
solutions?**

Any Alternative solutions?

- The Workgroup initially agreed at its first meeting that there were no Alternative Modifications to deliver the P383 solution
- We require Workgroup confirmation that there are no alternative Modifications that would better facilitate the Applicable BSC Objectives that should be taken forward for consultation



P383 Business Requirements run through

Page turn exercise

Business Requirements Update

Update from Workgroup meeting 1:

- Business Requirements previously stated that SVAA is responsible for producing a monthly assurance report
- Following internal impact assessment, we propose that BSCCo be responsible for producing the monthly assurance report, and carrying out subsequent investigative work
 - Internal team owning the process believe it beneficial to have the raw data and be responsible for producing the report and any other further analysis as required in a similar manner to other BSC functions

Business Requirements – Workgroup member comments

Minor comments/requests for clarification received from a Workgroup member in advance of third Workgroup meeting:

- **Add BR1.27** - Following BR1.26, SVAA will send a D354 with a suitable end date to the HHDA to cease D385 reporting from that end date, providing that no concurrent requirement remains in place
 - Requirement can be included

- **BR2.05** - Should SVAA notify the HHDA that invalid data has been received? Scenario 10 states the HHDA will not be informed, how was this decision reached?
 - We will investigate and provide a response within the P383 consultation documentation. We do not expect large volumes of sites to be registered. SVAA will take necessary action on a case by case basis

Business Requirements – Workgroup member comments

- **Scenario 11** – Unclear value in resending a D354 where no D355 or D356 has been received, it doesn't seem likely it would add any value and may in fact be detrimental
 - Rather than sending D354 continuously, there could be an exceptions to handle on a case by case basis – to be confirmed by ELEXON

- **Scenario 12** – This doesn't state how the issue would be progressed
 - ELEXON to provide a view of how this will be resolved as part of P383 consultation documentation or updated Business Requirements




P383 Legal Text run through

Page turn exercise

Legal Text

- The P383 solution will require changes to the following BSC Sections and CSDs
- Developed during Modification progression:
 - Section S
 - Section S-2
 - Section X
 - BSCP503
 - BSCP508
- To be developed during implementation phase:
 - SVAA URS
 - SVAA SD
 - SVA Data Catalogue
- BSCP503 and BSCP508 developed during Modification progression to be provided at the time of industry consultation due to the relevance of processes contained within for market participants



P383 ELEXON Service Provider Impact Assessment

Summary of costs and
implementation timescales

P383 ELEXON Service Provider Impact Assessment

- CUSC Modification CMP280/281 due for implementation in April 2021
- Suggested alignment between two Codes' Implementation Dats
- P383 can be delivered as an **ad-hoc BSC Release on 1 April 2021**
- Indicative cost approximately: **£470k**
 - Due to significant BSC Central Systems developments inc. TERRE, P354, Foundation Programme between now and the start date for P383 Central System developments to commence, the exact Architecture that P383 will be developed on in late 2020 is not fully known. Therefore, the quoted figure for P383 includes contingencies due the aforementioned unknowns.



P383 Impact on Settlement Risk

P383 Impact on Settlement Risk

- Potential impacts on HH DA and SVAA risks. These risks are listed in RER as being where these processes may be affected.
- P383 may affect HHDA and SVAA ability to carry on normal Settlement duties due to the undertaking of new tasks.
 - **Not significant risk** as we do not expect large numbers of storage facilities to participate, and P383 builds on some existing/forthcoming processes.
- **Risk 009** - The Data Aggregator does not process metered data correctly or at all - i.e. proposal would require HHDA's to report specific metered data to SVAA, a function it already may operate for EMR and P344 purposes;
- **Risk 034** - The SVAA does not process or transfer the correct data - i.e. SVAA would be required to aggregate specific metered data sent to it by HHDA's and report it to the Transmission Company




Workgroup Terms of References

Workgroup Terms of reference (1/2)

- a) What changes are needed to BSC documents, systems and processes to support P383 and what are the related costs and lead times?
- b) Are there any Alternative Modifications?
- c) Should P383 be progressed as a Self-Governance Modification?
- d) Does P383 better facilitate the Applicable BSC Objectives than the current baseline?
- e) Based on the solutions for Electricity Market Reform (EMR) reporting and P344, are there specific lessons or changes that should be incorporated into this solution?
- f) Whether this solution clearly sets out consistent provisions that will effectively support the operation of CMP280 WACM and/or CMP281?

Workgroup Terms of reference (2/2)

- g) Whether the approach to assurance is appropriate and whether there are any particular assurance measures that should be specified in the BSC or CSDs or if not specified in the BSC or CSDs that the Panel should consider adopting?
- h) What wider data provisions could be made available once the data has been collected as this would be useful for Parties trading in the market, and what data flows would be appropriate to use?
- i) In Ofgem's open letter on storage it had indicated that it is looking at a distribution site solution, the Workgroup should consider the solution being developed to support CUSC and also to support DCUSA.



Consultation Questions

Standard Consultation Questions

- Do you agree with the Workgroup's initial view that P383 does better facilitate the Applicable BSC Objectives than the current baseline?
- Do you agree with the Workgroup that the draft legal text delivers the intention of P383?
- Do you agree with the Workgroup's recommended Implementation Date?
- Do you agree with the Workgroup that there are no potential Alternative Modifications within the scope of P383 which would better facilitate the Applicable BSC Objectives?
- Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?
- Do you have any further comments on P383?

Additional Consultation Questions

- Do you agree that monthly checks of the validity of declarations by the BSCCo is an adequate frequency to identify errors or anomalies, and subsequently report on the performance of processes?
- Do you agree that the broad provisions for assurance give sufficient flexibility for the BSCCo and/or BSC Panel to determine appropriate assurance measures to be enforced?



Initial Voting

Workgroup views

Implementation Date and Legal Text

Implementation Date

- To align to the implementation date for associated CUSC Modifications CMP280/281, we recommend an Implementation Date for P383 of: **1 April 2021**
- Workgroup voting members to initially vote on proposed Implementation Date

Legal Text

- Subject to any amendment, does the workgroup agree that the draft P383 Legal Text delivers the intention of the proposed solution?
- Workgroup voting members to initially vote on proposed Legal Text

Self-Governance

- Self-Governance criteria:
 - A. is unlikely to have a material effect on:
 - i. existing or future electricity consumers; and
 - ii. competition in the generation, distribution, or supply of electricity or any commercial activities connected with the generation, distribution, or supply of electricity; and
 - iii. the operation of the national electricity transmission system; and
 - iv. matters relating to sustainable development, safety or security of supply, or the management of market or network emergencies; and
 - v. the Code's governance procedures or modification procedures; and
 - B. is unlikely to discriminate between different classes of Parties.
- P383 should **not** be treated as self-governance because it is likely to have a material and beneficial effect on competition in the generation of electricity, as it will even the playing field for storage operators participating with other generators.
- It will also have a beneficial effect on the operation of the national electricity transmission system, as well as matters relating to sustainable development
- Therefore, P383 materially impacts **(ii)**, **(iii)** and **(iv)**
- Workgroup unanimously agreed P383 should not be Self-Governance

Proposer's views against the Applicable BSC Objectives (1/2)

- A. The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License
 - P383 proposes to put in place processes that will collect, aggregate and report metered volumes to the Transmission Company; and
 - By building on best practice and making best use of existing and forthcoming centralised BSC processes and Systems, this solution will enable the efficient discharge of the Transmission Company's license obligations.
- B. The efficient, economic and coordinated operation of the National Electricity Transmission System
- C. Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity
 - P383 is necessary to support the implementation of the CMP280 WACM and CMP281; and
 - P383 is essential to promoting effective competition in the generation of electricity.

Proposer's views against the Applicable BSC Objectives (2/2)

- D. Promoting efficiency in the implementation of the balancing and settlement arrangement
 - P383 seeks to build on existing processes and make use of forthcoming processes, systems and interfaces.
- E. Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]
- F. Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation
- G. Compliance with the Transmission Losses Principle

Initial Voting – Applicable BSC Objectives (1/2)

- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License**
 - Majority positive
- b) The efficient, economic and coordinated operation of the National Electricity Transmission System**
 - Unanimously neutral
- c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity**
 - Unanimously positive
- d) Promoting efficiency in the implementation of the balancing and settlement arrangement**
 - Majority positive

Initial Voting – Applicable BSC Objectives (2/2)

- e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]**
 - Unanimously neutral
- f) Implementing and administering the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation**
 - Unanimously neutral
- g) Compliance with the Transmission Losses Principle**
 - Unanimously neutral



Modification Progression

Modification Progression and Next Steps

- Workgroup review of Assessment Procedure Consultation document **12 June 2019**
– **12pm 17 June 2019**

Event	Date
Workgroup Meeting	29 April 2019
Teleconference Workgroup Meeting	11 June 2019
Assessment Procedure Consultation	18 June – 9 July 2019
Workgroup Meeting	W/C 15 or 22 July 2019
Assessment Report to Panel	8 August 2019
Report Phase Consultation	13 August – 27 August 2019
Present Draft Modification Report to Panel	12 September 2019
Issue Final Modification Report to Authority	16 September 2019



Any other business

