

---

## P402 Skype meeting ground rules

---

- Welcome to the P402 teleconference – we'll start in a moment
- No video please – conserve bandwidth
- All on mute – use IM if you can't break through
- Talk – pause – talk
- Lots of us are at home – be mindful of background noise and connection speeds



# **P402 'Enabling reform of residual network charging as directed by the Targeted Charging Review'**

---

Workgroup Meeting 3

5 August 2020

# Meeting Objectives

- Consider a number of questions and clarifications for P402.

Agenda item	Lead
1. Welcome and meeting objectives	Lawrence Jones (Chair)
2. Second Workgroup meeting summary	Ivar Macsween
3. P402 Solution Summary	Nick Rubin
4. Further areas of consideration	Nick Rubin, Workgroup
5. Next steps	Ivar Macsween
6. Meeting close	Lawrence Jones

---

## P402: Timetable update

---

- Elexon has been working to a timetable whereby P402 is handed to Ofgem in October 2020 for consideration alongside other TCR code modifications.
- To meet this timescale, the Assessment Procedure Consultation for P402 would need to be issued on Monday 10 August, capturing relevant information to help industry come to an opinion on the solution, including:
  - Draft Legal Text
  - BSCCo Internal Impact Assessments to ascertain the costs of making the change.
- Over the course of Legal Text development and Impact Assessment, several complicating factors and clarifications have resulted in delays to accurately estimating the impact and cost on BSCCo for P402.
- Elexon note that delivery to September Panel at this stage would require the industry consultation period to be shortened and less time for proper review and of the consultation document, Legal Text and impacts.

---

## P402: Timetable update

---

- P402 has a soft dependency with the CUSC Mods - they will rely on a solution that provides NETSO with data for billing and tariff setting being implemented by April '22.
  - Whilst P402 enables the TNUOS TCR arrangements, it doesn't implement any of the core requirements of Ofgem's TCR SCR decision
- We have liaised with Ofgem and the TCR Implementation Steering Group (4 August) who noted that Authority receipt of Panel-approved P402 Legal Text and IA would not be strictly necessary for them to come to a decision on other TCR modifications.
- Ofgem has indicated that sending P402 FMR in November would be acceptable.
- This is a delay of 1 month, consulting in late August/early September rather than next week.



## **Summary of 2<sup>nd</sup> Workgroup meeting**

---

## P402: 2nd Meeting Summary

---

- The group agreed on an amended P402 solution, noting that it better addresses concerns from some BSC Parties by centralising the approach to aggregating Non Half Hourly data – thereby reducing the burden on LDSOs.
  - LDSOs would still be responsible for aggregating HH data and maintaining mapping tables in MDD.
  - SVAA would still be responsible for consolidating HH and NHH data to report to NETSO.
- The Proposer agreed that this would be a more efficient approach and agreed to adopt this approach in principle, with further detail to be fleshed out in the Business Requirements and reviewed by the Workgroup.
- It was agreed that P402 will target the standard February 22 release, subject to impact assessments, noting that a standard release is often more efficient and provides certainty and transparency to Parties.
- The group believe P402 should not be progressed as a self-Governance Modification, on the basis that it is likely to materially impact criteria iii) 'the operation of the national electricity transmission system' and potentially iv) depending on level of costs to Parties involved.



# **P402 Solution Summary**



---

## P402: Solution Summary

---

- To ensure that NETSO receives necessary data, P402 introduces processes that require the provision, consolidation and validation of three types of data to NETSO:
  1. Monthly Billing data;
  2. Annual Tariff Setting data; and
  3. Unmetered Supplies (UMS) data.
  
- P402 introduces new obligations
  - LDSOs to send BSCCo Billing Data and Tariff Setting Data
  - LDSOs to provide and maintain mapping tables in MDD, and
  - BSCCo to produce and send new Tariff Setting Reports and Billing Reports to NETSO and to add specific UMS data to the P0210 TUOS report.

---

# P402: Solution Summary

---

## P402 key elements

- For sites with CVA and SVA HH Metering Systems, LDSOs to send SVAA:
  - Billing Data on a monthly basis
  - Tariff Setting Data on an annual basis
- SVAA to determine Billing Data and Tariff Setting Data for sites with NHH Metering Systems
- SVAA to aggregate NHH and HH Billing Data to produce a new monthly Billing Report and send to NETSO
- SVAA to aggregate NHH and HH Tariff Setting Data to produce a new annual Tariff Setting Report and send to NETSO
- LDSOs to provide and maintain new mapping tables in Market Domain Data, in particular:
  - An LLFC:Residual Charging Band mapping table
    - Including 'pseudo' LLFCs for CVA sites
  - An CVA registrant mapping table
- SVAA to specifically report HH and NHH UMS data necessary for calculating TDR in the P0210 'TUOS Report'

---

## P402: Solution Summary

---

- Both the Tariff Setting Reports and Billing Reports will be compiled following these overall steps:
  1. LDSOs compile and send HH data to BSCCo using a common file format to be specified in the SVA Data Catalogue;
  2. SVAA determines NHH data;
  3. SVAA consolidates each HH and NHH data into a single report (also specified in the SVA Data Catalogue); and
  4. BSCCo sends the consolidated report to NETSO.

---

# P402: Solution Summary

---

## Mapping

- P402 will introduce requirements on LDSOs to provide and maintain mapping tables:
  - LLFC:Residual Charging Bands - essential to correctly aggregate Settlement and LDSO data, reported by LLFC, for the calculation of TNUOS Demand Residual Charges.
  - CVA registrant mapping – LDSOs' billing systems' records for CVA registrants may not match those held for Settlement. Therefore LDSOs must agree with ELEXON how to match registrant details so SVAA can correctly report to NETSO using BSC Party and BMU details

## Initial Reporting

- In order to set new TDR charges to take effect from 1 April 2022, NETSO requires Tariff Setting Data in October 2021.
- P402 will not have been implemented by this point and BSCCo will not have the data necessary to produce a Tariff Setting Report in October 2021.
- Therefore LDSOs have agreed to provide, bi-laterally and directly, a one-off set of Tariff Setting Reports to NETSO in October 2021. The bilateral provision of this data sits outside this BSC Modification Proposal.
  - Is this the correct approach?

---

## P402: Handling of NHH data

---

- Feedback identified that some LDSO systems are configured to load data for billing that would be incompatible with the original P402 requirements and so would likely require costly system changes.
- An alternative approach was proposed. ELEXON should use NHH Settlement Data that LDSOs would otherwise use. This would reduce the burden on LDSOs, who would only focus on HH sites.
- Based on this point, the P402 group endorsed the following approach:
  1. SVAA uses existing NHH Settlement data (i.e. Supplier Purchase Matrix data received in D0041) to determine NHH Billing data and NHH Tariff Setting Data.
  2. LDSOs continue to report Billing and Tariff Setting Data for sites with HH Metering Systems (SVA and CVA) and to provide LLFC:Band and CVA MPID mapping tables.
  3. ELEXON continues to consolidate the NHH and HH data into monthly Billing and annual Tariff-setting Reports
- **NOTE** – this approach assumes that LLFC:Band Mapping can correctly allocate NHH MSID counts and consumption to the correct Residual Charging Bands, including for NHH sites with more than one MSID.



**Further areas of  
consideration**

---

## P402: Further areas of consideration

---

### **LDSOs provide will provide Site Counts**

- Under the P402 Solution each LDSO will provide Billing Data for its HH Sites to SVAA.
- Originally the solution specified that LDSOs would report Final Demand Site Counts.
- In practice LDSOs will report Site Counts that include Final Demand and non-Final Demand Sites. I.e. some LLFCs will be mapped to a non-chargeable band.
- Using mapping tables, SVAA will determine Final Demand Site Counts and consumption to report to NETSO
- Therefore:
  - The definition of Billing Data and Tariff Setting Data will refer to Sites, which include Final and non-Final Demand
  - Our definition of Charging Band will include those defined in CUSC/DCUSA and any additional non-chargeable bands as may be necessary

---

## P402: Further areas of consideration

---

### Accurate determination of Non Half Hourly Billing data

- SVAA will determine NHH Billing Data from existing Settlement Data (D0041 data flows). D0041s provide the SVAA NHH MSID counts and total EACs and AAs per Settlement Day, for each Registrant in a GSP Group for each LLFC. SVAA will attribute the MSID Counts and EAC/AA data to Residual Charging Bands according to LDSOs mapping.
- This relies on two factors:
  - typically a 1:1 relationship between NHH MSIDs and sites; and
  - For NHH sites with more than one MSID, e.g. use of Related MSIDs, that each LLFC can be mapped to a Residual Charging Band or non-chargeable band.
- However, we'd need to exclude the Related MSID for Billing Reports but include the Related MSID's consumption for Tariff Setting Reports.
  - Our understanding is that LDSOs cannot attribute Related MSIDs to the correct Charging Band for Tariff Setting.
  - This may only be a small volume (0.02%?). Therefore is it reasonable to accept this inaccuracy? Is it likely to grow? Are there other complex NHH arrangements that may not be allocated accurately?
  - Even if Related MSIDs could be attributed correctly, we'd need two LLFC:Band Mapping Tables – one for Billing and one for Tariff Setting.





# **Terms of Reference**

---

## P402 Workgroup Terms of Reference

---

- a) Can LDSOs deliver the data that National Grid require?
- b) Specific definition of what needs to be reported and how frequently it needs to be reported.
- c) How should the reporting specified by this proposal handle data or process errors and disputes?
- d) Consider whether and if so how a one-off set of Tariff Setting Reports should be provided to NETSO before 1 April 2021, in order to set tariffs to take effect from 1 April 2021.
- e) How to ensure the P402 solution is compliant with GDPR regulations?
- f) What changes are needed to BSC documents, systems and processes to support P402 and what are the related costs and lead times?
- g) Are there any Alternative Modifications?
- h) Should P402 be progressed as a Self-Governance Modification?
- i) Does P402 better facilitate the Applicable BSC Objectives than the current baseline?



**Next steps**

---

## P402 Next Steps

---

- ELEXON will develop Legal Text, Business Requirements and circulate these for Workgroup review
- WG to review Business Requirements and Legal Text
- Results from impact assessments will be gathered and shared at next Workgroup
- Short Workgroup meeting to gather initial views

