

P402 Microsoft Teams Meeting

- 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

ELEXON

P402

Allowing extensions to ELEXON's
business and activities subject to
additional conditions

28 September 2020

Meeting Objectives and Agenda

- Review the Business Requirements;
- Consider the costs and impacts of P402;
- Consider questions to include within the Assessment Procedure Consultation; and
- Provide Initial views against the BSC Objectives.

Agenda Item	Lead
Welcome and meeting objectives	Claire Kerr (Chair),
Summary of 3rd Workgroup Meeting	Ivar Macsween
Updates to Solution and Business Requirements since the last meeting	Nick Rubin, Shamaila Jawaid
P402 Terms of Reference	Ivar Macsween
Initial views against the BSC Objectives	Workgroup
Assessment Consultation questions	Workgroup
Next steps	Ivar Macsween
Meeting close	Claire Kerr

P402 Legal Text Update

Elexon had been planning to review Legal Text with the Workgroup today, however some complications have emerged which have delayed production and review.

Further work is required in order to give effect to the P402 Solution to reconcile definitions in CUSC/DCUSA with BSC provisions and develop certainty around its implementation via the BSC.

To avoid delaying P402, Elexon propose to agree Legal Text with the Workgroup after the Assessment Procedure Consultation is returned.

- Under the BSC Draft Legal Text is not required for the consultation, however the reasons for its omission will be captured in the APC Document and in communications.
- The Workgroup will be given time to review P402 Legal Text before Assessment closes, to include within the Assessment Report.
- BSC Section F 2.6.13 details what Panel must determine when the AR is presented - does not include legal text

Key consideration for this approach: Are the Workgroup satisfied that the P402 Solution and its Business Requirements are clear to industry with the addition of Legal Text?



SUMMARY OF 3RD WORKGROUP MEETING

P402 3rd Workgroup Summary

Timetable update

- The group discussed how P402 has a soft dependency for the related CUSC modifications - they will rely on a solution that provides NETSO with data for billing and tariff setting being implemented by April 2022. It was agreed that whilst P402 enables the TNUOS TCR arrangements, it doesn't implement any of the core requirements of Ofgem's TCR SCR decision.
- Having liaised with Ofgem and the TCR Implementation Steering Group (4 August), 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.

P402 Solution Development

- For setting of new TDR charges to take effect from 1 April 2022, the group agreed to treat the bilateral provision of this data as outside this BSC Modification Proposal and its accompanying Legal Text but should be documented in the description of the P402 solution in its reports to Panel and Ofgem.
- The group considered whether LDSOs or BSCCo would be better placed to compile NHH Tariff Setting and Billing Data. For now - Workgroup agreed that, for now, the proposed solution remains the same with Elexon consolidating this data.
 - the two different routes will be captured in the Assessment Procedure Consultation, which provides an opportunity to source wider industry views.

P402 3rd Workgroup Summary

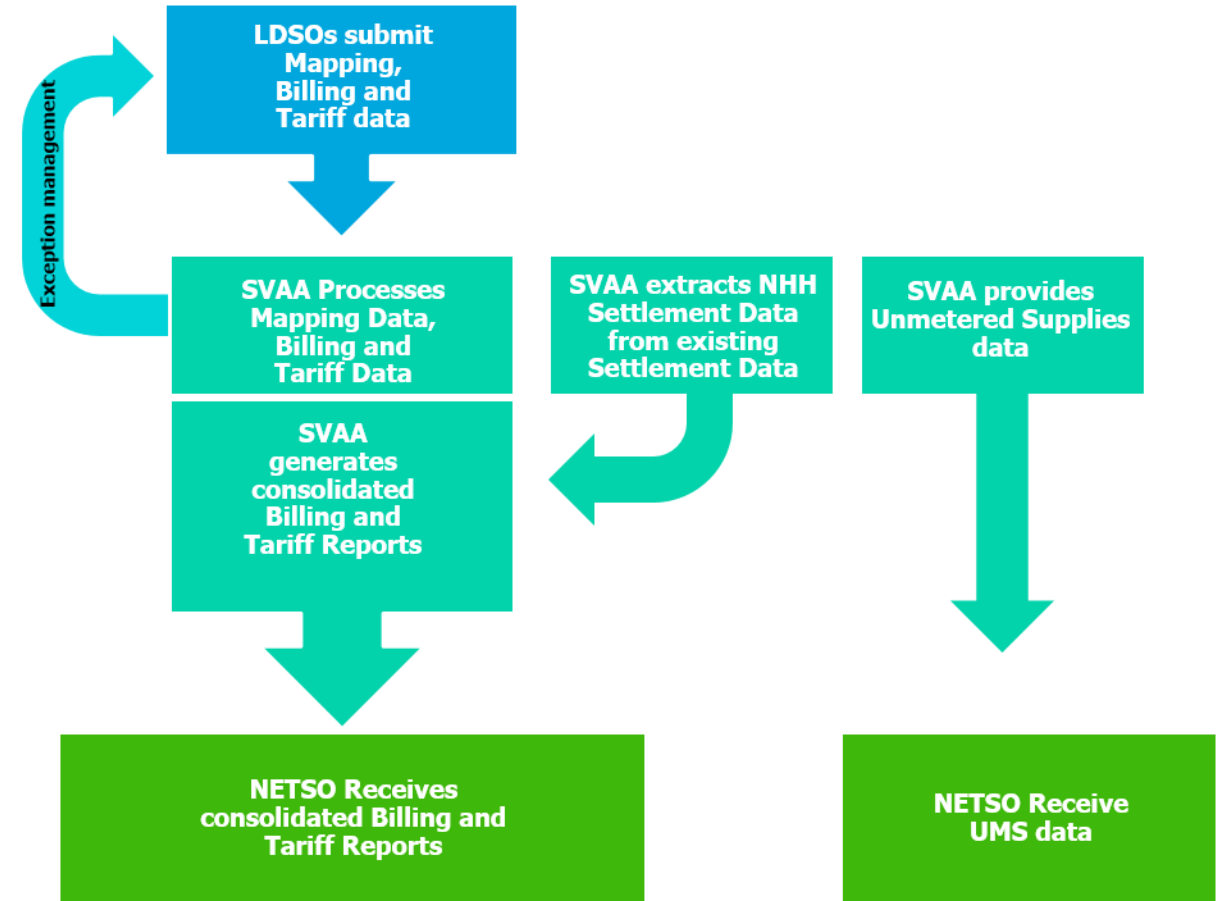
- The group were comfortable with assumption that LDSOs will report Site Counts that include Final Demand and non-Final Demand Sites.
- LDSOs will not be able to accurately allocate Imports for 'related MSIDs' to Charging Bands but Workgroup believe this likely to represent a very small proportion of Imports (~0.02%).
 - The Workgroup were therefore not unduly concerned, noting that the issue is a diminishing one as legacy arrangements wind-down (e.g. RTS) and NHH meters are replaced with Smart Meters.
- Elexon noted that they had initially assumed that Measurement Classes F and G MSIDs should be included in HH Billing and Tariff Setting data, as MC F and G represent HH MSIDs. However, LDSOs treat these classes as NHH, even though they are technically HH Settled. It was agreed that NHH billing and tariff data will include measurement classes F&G and this will be made clear in the Business Requirements.
- The Workgroup also discussed the level of expected transparency for Residual Charging data. The National Grid representative noted that transparency is desirable if the data is not commercially sensitive. Their ideal scenario would involve the publishing on input, calculations, final figures and bands, but this would need to be taken away for consideration and confirmation.
- National Grid took an action to do this, following which the Workgroup can consider where any transparency requirements should sit.



UPDATES TO P402 SOLUTION SINCE THE LAST MEETING

P402 Solution summary

- P402 introduces processes that require the provision, consolidation and validation of three types of data to NETSO (Monthly Billing data, Annual Tariff Setting data and Unmetered Supplies (UMS) data), the creation of two new reports to NETSO and an update to the P0210 'TUOS Report'.
- The new Tariff Setting Reports and Billing Reports will be compiled following these overall steps:
 1. LDSOs compile and send Half Hourly (HH) reports to BSCCo (SVAA) using a common file format to be specified in the SVA Data Catalogue. BSCCo extracts NHH data from existing Settlement data;
 2. BSCCo consolidates each LDSO's report along with the NHH Settlement data into a single report (which will be specified in the SVA Data Catalogue); and
 3. BSCCo will provide/enable access to the consolidated reports to NETSO.



P402 Solution summary

Key elements of P402

- **Mapping tables maintained in MDD**
 - LDSOs to provide and maintain tables: LLFC:Charging Band and Dummy CVA LLFC:Dummy CVA MPID:Actual CVA LLFC
 - ELEXON to derive BMU and Registrant Details from Actual CVA LLFCs
- **Billing Data and Report**
 - LDSOs provide monthly HH Billing Data (including updates in accordance with Reconciliation Settlement Runs)
 - ELEXON derive NHH (inc MC F&G) Billing Data from Settlement Data
 - ELEXON compile monthly Billing Report and publish this on ELEXON Portal
- **Tariff Setting Data and Report**
 - LDSOs provide annual HH Tariff Setting Data
 - ELEXON derive NHH (inc MC F&G) Tariff Setting Data from Settlement Data
 - ELEXON compile annual Tariff Setting Report and publish this on ELEXON Portal
- **UMS**
 - ELEXON to include new HH and NHH UMS data in P0210 TUOS Report

P402 Updates to Solution since the last meeting

- **MDD Mapping**
 - Simplified the CVA mapping requirements for LDSOs
 - LDSOs provide dummy CVA LLFC:dummy CVA MPID:actual CVA LLFC
 - ELEXON use actual CVA LLFCs to accurately identify BMUs and Registrant details
- **Data retention**
 - LDSOs and ELEXON must retain and make data available for 28 months
 - Expands existing retention requirement that applies to Settlement Data
- **Other changes**
 - NHH Billing Data – Removed Default EAC count
 - Validation – ELEXON to send exception reports to LDSOs
 - Publication of Billing and Tariff Setting Reports on Portal using P114 data approach (I.e. programmable)



P402 AREAS FOR WORKGROUP INPUT

P402 Areas for Workgroup discussion

- **Publication of Reports on Portal** – Tariff Setting Reports will be available to all Users, should Billing Reports be made available to all or should access be limited?
 - Are site counts per registrant commercially sensitive?
 - If Billing Report to be limited, we propose that only NETSO has access and Parties use CUSC Billing Query provisions
- **LDSO:SVAA interface** – should this be an automated system:system interface?
 - Current solution assumes LDSOs submit data by email
 - No time to establish new DTC flows. FTP?
 - Automation aligns with BSC best practice and design principles
- **Should P402 assess impacts on MDD and systems by increasing use of LLFCs?**
 - Overall TCR solution will more than double use of LLFCs (~16k to ~35k)
 - Suggestion that impact of increase in LLFCs ought to be assessed under P402
 - However, P402 does not by itself require increase in LLFCs, which would be necessary irrespective of P402



P402 BUSINESS REQUIREMENTS AND REVIEW OF COMMENTS



STEP THROUGH P402 BUSINESS REQUIREMENTS VERSION 7

Business Requirements – Workgroup comments

“p7 - LDSO box - I would just refer to their billing systems as the source of data. They are providing the counts for SVA HH and Embedded CVA registered sites per GSP Group per DNO ID. This is clear in the later text but not in the diagram, but that may not matter ?”

Updated to remove the source data box as it intended as a supporting overview

“p8 - UMS - as written this implies HH UMS is MWh and NHH UMS is EAC. The data in the D0081 contains the MWh values per Supplier Id for NHH UMS and HH UMS as they each have their own CCC Id.”

Compiled from the same source data - D0040/D0041 data, profiled NHH KWh / MWh (BR-16)

“p14 - I believe that the SPM Total EAC Count includes the SPM Total Default EAC Count”

Corrected (BR-23/34)

“BR28 - I am not sure why we feel the need to create a pseudo Id for Embedded CVA sites. I think the BSC Party Id (eg DONG008) will work OK. I would not bother with the BMU Id as between Id, GSP Group and LLFC I can work it out for myself what the BMU Id is. Just to confuse matters some DNOs will use "976" as the CVA LLFC Id and others will use "MSID: 0716".”

We need to report by BM Unit. To obtain the BM Unit, we need the CVA LLFC, which can only be obtained from the pseudo CVA LLFC and pseudo MPIDs (BR-28)

Business Requirements – Workgroup comments

“Aggregation of Data - When all is said and done, whenever that might be, we can add the numbers up any way we choose. Personally, I would like to see the data at the raw input level go to NGC so they can provide it to Parties. How many intermediate ways of aggregating it that anyone wants becomes somewhat subjective. I am not sure we know what the requirements are until we consult on it.

As much as anything else it depends on whether we simply provide the lowest level of data to NGC and let them add it up / decide how they present the numbers to Parties or whether we are deciding that as part of the consultation and then defining how many ways we will aggregate it and present to to NGC so they can pass it on?

The BRs set out how the data could be aggregated from the input data provided by LDSOs / daily profiled EAC/AA data (D0030s) (BR-24/34)

“The Business Requirements for publishing any data are noticeable by their absence.”

Not part of current scope of requirements, to which this adds complexity, however can be picked up via a billing query, or if not confidential publish and make public?

Business Requirements – Workgroup comments

Data provision:

in addition to having to wait for SF data, we then need to wait for the calendar month to end, on top of (the understandable) 4 days processing time – this leads to quite a lag in the data, much more than we have now. In the longer term (maybe through Access & Forward-Looking Charges) we'll be looking to reduce this timescale to get the information quicker so worth noting.

the document talks about emailing the file or us downloading from the website: this doesn't lend itself to automation, and introduces process risk in the manual handling of files but accept there's still discussions underway on this.

Agreed to publish Tariff and Billing data reports via a programmable interface with access control (BR-18/19)

reference to file size being massive – presumably this is because you are providing one file for a months' worth of data (see below) – slightly confused about this because I thought one months data should be less than a current days P0210 since we aren't reporting at the level of settlement period for multiple charge types (HH by measurement class and NHH), and less than one days' worth of i014 that has lots of other data (70+fields)

- can we clarify how many files we would receive – I wasn't sure if everything is in one monthly file (SF and revisions, that would just grow and grow) or whether we'd get SF, R1, etc

ELEXON: the volumetrics are provided in relation to input data from LDSOs for impact assessment by our development partner. We are expecting to provide to you one file per month for billing data and one file per year for tariff setting data.

“LDSOs provide details of the relationship between LLFCs and Charging Bands and may also provide additional charging band categories for LLFCs, which are used to group together Non-Final Demand Sites.”

May be worth considering if/how this mapping is made transparent to industry as/when it's updated - but not key for the delivery of the proposal.

There is a requirement for mapping data to be published on MDD (BR-10/28/40)

Business Requirements – Workgroup comments

Slightly concerned about data retention for only one year:

Made me wonder what the current “SLA” is on that for i014 and P0210 ? Naturally we’d expect it to be at least for that duration – if it is 1 year then we may want to reinforce our archiving and retention accordingly as some of us may be operating on the “we can always get a copy if we need to” policy

Data retention updated to 28 months (BR-36)

Occasionally (and by exception for the purposes of resolving disputes) we may need to get a breakdown of how many Sites are in each LLFC (and how that maps to Charging Bands) for a Supplier

Data retention updated to 28 months (BR-36)

Not clear from the BRs if we'll get measurement class F&G data reported separately or combined as HH UMS.

ELEXON: Measurement class F & G are not UMS measurement classes. Measurement class D applies to HH UMS. BR16 has been corrected by removing the following statement:

“Measurement classes 'F' and 'G' will be reported as half hourly UMS.” (BR-16)

When reporting, or deriving, tariff setting and billing data, measurement classes F & G will be treated as though they are non-half hourly.

Business Requirements – what has changed since v6?

- **Mapping**

- **Amended BR-28** LDSOs to provide LLFC->BM Unit mapping. LDSOs will now provide a dummy LLFC:dummy MPID:CVA LLFC mapping. Elexon will use the CVA LLFC to obtain the BM Unit ID, as the working practice is that CVA LLFCs = MSIDs.
- **New BR-40** for Elexon to create the LLFC > BM Unit mapping (for CVA sites only)
- **Removed BR-29** LDSOs to provide Registrant mapping details- no longer req'd. Registration details can be obtained from BM Unit details.
- **Amended BR-10** LDSOs to provide LLFC > Charging Band mapping to make explicit that the CVA LLFCs are pseudo CVA LLFCs

- **Amended BR-30** LDSOs ensure mapping details are kept up to date, updated to reflect that LDSOs only need to provide the delta rather than the whole table:
 - ”Upon changes to the mapping tables, only changed records need to be provided, rather than an entire updated table.”

- **General**

- **Swimlanes - 31 Sept corrected, removed sources of Billing Data from LDSO swimlane**
- **SVAA Volume Allocation Run (VAR) dates updated as per below.**
 - the Initial Volume Allocation Settlement Run (SF) is run ~~46WD~~-15WD after the Settlement Date –
 - the 1st Reconciliation (R1) takes place approximately 39WD after the Settlement Date (between 36 and 40 WD)
 - the 2nd Reconciliation (R2) takes place approximately 84WD after the Settlement Date (between 81 and 85 WD)
 - the 3rd Reconciliation (R3) takes place approximately 154WD after the Settlement Date (between 151 and 155 WD)
 - the Final Settlement Run takes place approximately 292WD after the Settlement Date (between 289 and 293 WD)

Business Requirements – what has changed since v6?

- **Deriving NHH Billing data**
 - Corrected BR-24/34 – SVAA to obtain monthly NHH Billing data – corrected business logic
 - SVAA to derive NHH Billing Data for P402 from the [D0030](#), i.e. count of Metering Systems for each Settlement Date in the Reporting Period by summing the D0030 SPM Total EAC Count, and SPM Total AA Count and ~~SPM Total Default EAC Count~~ by LLFC, GSP Group and Registrant ID, for each Distributor ID.
- **Data retention**
 - **New BR-36**

The solution must enable both HH and NHH Billing and Tariff data, provided by LDSOs and obtained by the SVAA, to be available 28 months from the applicable Settlement Date.
- **Data validation & exception management**
 - **New BR-38**

The solution must ensure that, for any validation failure, SVAA must provide an exception report to the relevant LDSO(s).
 - **Amended BR-8/9 on SVAA to validate Billing/Tariff Setting data to add additional check**

check that the combination of Distributor ID, LLFC and GSP Group is correct for the Reporting Period.
 - **New BR-31 for reporting missing data as null values**

“When consolidating/aggregating Billing Report and Tariff Setting data, SVAA must report any missing counts of Final Demand Sites or Final Demand Import (MWh) as null values.”

Business Requirements – what has changed since v6?

- **Data outputs**

- BR-18/BR-19 on SVAA to publish Billing/Tariff Setting reports
 - preferred file format is JSON
 - Provide to NETSO via a programmable interface and user access control, similar to P114 functionality

- **UMS**

- BR-16 – Measurement class F&G in UMS corrected – removed “Measurement classes 'F' and 'G' will be reported as half hourly UMS.”



P402 TERMS OF REFERENCE

P402 Terms of Reference

1. Can LDSOs deliver the data that National Grid require?
2. Specific definition of what needs to be reported and how frequently it needs to be reported.
3. How should the reporting specified by this proposal handle data or process errors and disputes?
4. 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.
5. How to ensure the P402 solution is compliant with GDPR regulations?
6. What changes are needed to BSC documents, systems and processes to support P402 and what are the related costs and lead times?
7. Are there any Alternative Modifications?
8. Should P402 be progressed as a Self-Governance Modification?
9. Does P402 better facilitate the Applicable BSC Objectives than the current baseline?

P402 Costs and Impacts

Costs

- System changes required for this Modification are estimated to cost between £1.5 to £2 million and will require a 10-12 month implementation phase.
- Central implementation costs for this Modification will be approximately £900 to make the required document changes.

Impacts

- P402 will introduce obligations on LDSOs to provide monthly Billing Data and Tariff Setting Data.
- Detailed descriptions of processes and interfaces necessary to support the proposal are in the BRs.
- Elexon impacts include updating LWIs & training materials and communicating the change to Parties. Exception handling and escalation management. Initial mapping of tables.
- Proposed that Elexon develops redlining for the following CSDs and submit such redlining for industry review as part of the implementation phase of this Modification, subject to its approval. We expect to issue these documents for industry review by Spring 2021, subject to planning.
 - BSCP503 - Half Hourly Data Aggregation, BSCP508 - Supplier Volume Allocation.
 - Other Code Subsidiary Documents including SVAA SD, SVAA URS, SVA Data Catalogue

Applicable BSC Objectives

- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence
- b) The efficient, economic and co-ordinated 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
- d) Promoting efficiency in the implementation of the balancing and settlement arrangements
- 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

Applicable BSC Objectives

The Proposer had initially identified a positive impact on Objectives (a) and (d)

Applicable BSC Objective (a) ‘The efficient discharge by the NETSO of the obligations imposed upon it by the Transmission Licence’

- NETSO has been directed by Ofgem to give effect to Ofgem’s TCR SCR Decision by raising changes to the CUSC and ‘any such consequential proposals for modification to ... other industry codes’. P402 is intended to enable CMP332, 334 and 335/6 and therefore for the Proposer to comply with Ofgem’s Direction, thereby complying with its license.
- Elexon agreed with the Proposer that this Proposal has been raised to comply with Ofgem’s TCR SCR Direction and will therefore better facilitate Objective (a) by enabling the efficient discharge of the NETSO’s licence obligations.

Applicable BSC Objectives

Applicable BSC Objective (d) ‘Promoting efficiency in the implementation of the balancing and settlement arrangements’.

- There are no existing means of providing NETSO with the data it requires to implement TCR outcomes, a co-ordinated pan-industry approach supports Objective (d).
- BSC processes and systems already provide a centralised mechanism for collecting, aggregating and sharing data with NETSO and LDSOs for network charging purposes. This approach has been maintained by industry because it provides a consistent, secure, efficient and cost effective means of enabling both Settlement and non-Settlement processes.
- In its Decision, Ofgem recognised ‘there could be merit in a centralised approach to setting band thresholds and allocating users to bands, which could involve changes under the BSC or other centralised systems. We think this has strong potential to offer a more efficient solution than a fragmented approach across individual parties and we encourage the industry to thoroughly explore the costs and benefits of such an approach.’
- P402 would continue to take advantage of BSC Systems, processes and governance in enabling the calculation of TNUoS charges.
- The Proposer and ELEXON believed that making best use of existing centralised BSC Systems and processes would deliver an overall more efficient outcome than developing potentially duplicative systems and processes, which could further fragment and increase the level of complexity in the industry arrangements.

Assessment Consultation Questions

- Default questions ask for views on whether P402 will impact their organisations, if it better facilitates BSC Objectives and views on implementation approach and alternative Modifications.
- Are there any questions the Workgroup believe should be included?
 - anything that would help the Workgroup to complete assessment of P402?
- Potential Question: Do you agree with the Workgroup that Elexon should consolidate NHH D0030 and D0040 Data on behalf of LDSOs?
- Potential Question: Should Billing Reports be published so all Parties etc have access? Are the contents (i.e. site counts) commercially sensitive?
- Potential Question: Is the intent of P402 clear from the Solution and Business Requirements, without the addition of Legal Text?



NEXT STEPS

P402: Next Steps

- ELEXON to update Business Requirements based on today and develop Legal Text
- W/C 28 September: WG review Assessment Procedure Consultation
- W/C 28 September: WG review finalised (pre-Consultation) and Business Requirements
- We aim to issue P402 for Consultation 5 October 2020 (15 Working Days)
- W/C 26 October: Workgroup meeting to review APC responses, review Legal Text and provide final views

- BSC Panel consider Assessment Report at 12 November meeting

P402: Next Steps

Event	Date
Present IWA to Panel	12 March 2020
Workgroup meeting 1	31 March 20
Workgroup meeting 2	8 May 2020
Workgroup meeting 3	5 August 2020
Workgroup meeting 4	28 September 2020
Assessment Procedure Consultation	5 October – 23 October 2020
Workgroup meeting 5	W/C 26 October 2020
Present Assessment Report to Panel	12 November 2020
Report Phase Consultation	16 November – 27 November 2020
Present Draft Modification Report to Panel	10 December 2020
Issue Final Modification Report to Authority	14 December 2020