

P419 Microsoft Teams Meeting

- Welcome to the P419 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

ELEXION

P419 – Workgroup 2

Enhanced Reporting of Demand Data to the
NETSO to facilitate BSUoS Reform

12 October 2021

Meeting Objectives and Agenda

| Agenda Item | Lead |
|--------------------------------|------------------------|
| Welcome and meeting objectives | Lawrence Jones (Chair) |
| Workgroup 1 - Action Updates | Craig Murray |
| Proposed Solution | Callum Chalmers |
| Terms of Reference | Workgroup |
| Initial Voting | Workgroup |
| Next Steps | Craig Murray |
| AOB | Workgroup |

Objectives:

- Agree the solution to be taken forward for Business Requirement development and industry consultation;
- Agree the progression of the Modification



WORKGROUP 1 ACTION UPDATES

P419 – Workgroup 1 Action Updates

| # | Action | Update |
|---|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| 1 | Liaise with NGESO in regards to Elexon processing CVA-related BSUoS exemption declarations | Completed |
| 2 | Elexon to analyse P383/storage data to determine volume of BSUoS exempt demand since implementation | Completed |
| 3 | Elexon to propose P419 reporting requirements and solution at next Workgroup meeting | Completed |
| 4 | Elexon to finalise Business Requirements/legal text and circulate to Workgroup members | To be finalised after Workgroup agreement of solution |
| 5 | Elexon to perform impact assessment before returning findings to Workgroup | Completed |
| 6 | NGESO to perform impact assessment if CVA declarations to be handled by Elexon | NGESO to confirm |

Alignment and synergy

P419

Declarations

Request/obtain metered volumes

Aggregate/calculate metered volumes

Provide data & reports

Assure Declarations

P395

Declarations

Request/obtain metered volumes

Aggregate/calculate metered volumes

Provide data & reports

New calculation methodology

Assure Declarations

P376

BM Unit & MSID/AMSIDs

Request/obtain metered volumes (historic)

Aggregate metered volumes / calculate

Provide data & reports

New baselining methodology

Assure Methodology

Click to type



PROPOSED SOLUTION

BSCP602 Form Contents

Section A - Supplier Details

- Supplier MPID
- Authorised signatory
- Party ID

Section B – Site Operator Declaration

- Director declaration and signature

Section C – Facility Details

- Company information
- Facility name and address
- Site type and description
- Total MSIDs

Section D – Metering System Information

- MSID number and EFD
- Supplier MPID and EFD
- HHDA MPID and EFD

Declarations options

Option 1 (BPM)

- Site Operator uses Elexon Website form to fill in details (Form sections B, C, D)
- This populates site information on Kinnect and prompts supplier to complete Section A
- Elexon validates the info

Option 2

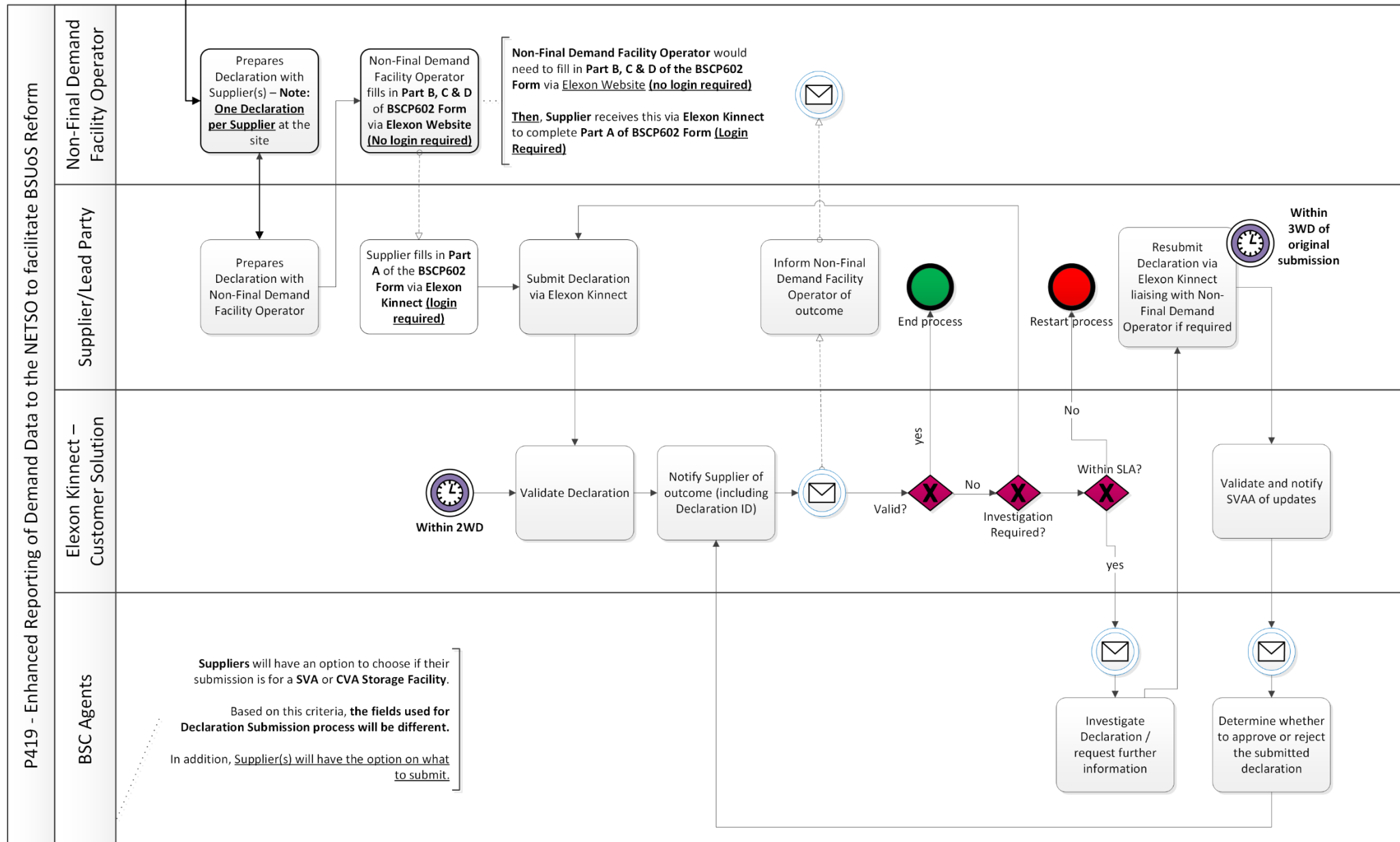
- Supplier fills obtains site and supplier information, Sections A, C and D.
- Supplier obtains Director signature from Site Operator, Section B.
- Supplier enters details into Elexon Kinnect
- Elexon validates info

Option 3 (Current)

- Site Operator/Supplier collate sections A, B, C and D
- Complete declaration is emailed to Elexon
- Inserv manually enter data into Kinnect
- Elexon validates info

Declaration Submission Summary

| P419 - Enhanced Reporting of Demand Data to the NETSO to facilitate BSUoS Reform | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Declaration is required > Supplier & Non-Final Demand Facility Operator work together to fill in details required from BSCP602 Form.</p> <p>Non-Final Demand Facility Operator will need to complete Part B, C & D of BSCP602 Form via Elexon Website, upon submission this will flow into Elexon Kinnect and notify each Supplier for them to complete Part A of BSCP602 Form</p> <p>Suppliers will complete the Declaration and submit it via Elexon Kinnect (Customer Solution).</p> | <p>Elexon Kinnect (Customer Solution) will validate the Declaration and notify the Supplier of the outcome (valid or invalid – this confirmation will contain the validation ID).</p> <p>Regardless of the Declaration being valid or invalid > it is the Supplier’s responsibility to notify the Non-Final Demand Facility Operator of the outcome and send the Declaration ID.</p> |
| <p>If valid > then the process will end there.</p> <p>If invalid (<u>incorrect or missing information</u>) > Supplier will be informed and will have to resubmit the Declaration within 3WDs of the original submission.</p> | <p>Supplier will be kept updated of outcome via Elexon Kinnect (status of Declaration) or via email when required.</p> |



Reporting

- BSCCo will publish monthly data on Non-Final Demand Metered Volumes
- Sum of all metered demand data for Non-Final demand facilities, broken down by Settlement Day, Settlement Period, GSP Group
- BSCCo won't publish data that could be attributed to a single facility. If there is a single facility in a GSP group, data for multiple GSPs could be combined

Considerations

- The Panel can from time to time amend the content and frequency of reporting
- Future Analysis and Insights solution could be used to publish data more frequently
- Method for publication to be agreed.



TERMS OF REFERENCE

P419 – Terms of Reference

- a) Is the CVA declarations process an appropriate means to exclude CVA non-Final Demand from BSUoS charges?
- b) If a signed declaration is made, should export metered values be collected to validate a site's eligibility for exemption?
- c) How will P419 impact the BSC Settlement Risks?
- d) What changes are needed to BSC documents, systems and processes to support P419 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?
- e) Are there any Alternative Modifications?
- f) Should P419 be progressed as a Self-Governance Modification?
- g) Does P419 better facilitate the Applicable BSC Objectives than the current baseline?
- h) Does P419 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

P419 – Terms of Reference (b)

If a signed declaration is made, should export metered values be collected to validate a site's eligibility for exemption?

- Export volumes should be collected for BSUoS-exempt SVA sites
- If CVA declarations included in solution - export volumes should **not** be collected for BSUoS-exempt CVA sites

P419 – Terms of Reference (c)

How will P419 impact the BSC Settlement Risks?

- P419 will not impact any BSC Settlement Risks

P419 – Terms of Reference (d)

What changes are needed to BSC documents, systems and processes to support P419 and what are the related costs and lead times?

Market Participant Impacts

- **Generators**
 - The process would require generators to sign a declaration that they were ineligible for BSUoS charges which they would send to Suppliers
- **Suppliers**
 - Suppliers would pass the above declaration to the SVAA to be excluded from Final Demand, which would in turn be sent to NGESO
- **Half Hourly Data Aggregators**
 - No impacts expected on systems and processes, but higher volume of data related to BSUoS-exempt sites expected
- **NGESO**
 - NGESO will be required to process the above declarations and process the data accordingly.

P419 – Terms of Reference (d)

What changes are needed to BSC documents, systems and processes to support P419 and what are the related costs and lead times?

Document Impacts

BSC Sections:

Section K

Section S

Section S-2

Section X-1

Section X-2

BSCPs:

BSCP15 – BM Unit Registration

BSCP503 - Half hourly data aggregation for SVA metering systems registered in SMRS

BSCP602 - SVA metering system register

Other CSDs:

SVAA Data Catalogue, Service Description and User Service Description

Note: Most of the redlining is to change “Storage” to “Non-Final Demand”

P419 – Terms of Reference (d)

What changes are needed to BSC documents, systems and processes to support P419 and what are the related costs and lead times?

System Impacts

- Supplier Volume Allocation Agent (SVAA)
 - P419 would increase the scope of the sites to be excluded from Final Demand data sent to NGESO, increasing the amount of declarations to be processed and requiring new capabilities to be built

Costs

- Rough Order of Magnitude Impact Assessment indicates the central implementation costs for this Modification will be **£400k - £900k**, inclusive of CVA declarations
- The costs of including CVA declarations process estimated to be **£150k - £250k**
- Estimated lead time of 10 months
- Detailed impact assessment to be returned by December

P419 – Terms of Reference (a)

Is the CVA declarations process an appropriate means to exclude CVA non-Final Demand from BSUoS charges?

Does the Workgroup believe the P419 solution should incorporate CVA non-final demand declarations of exemption from BSUoS charges?

P419 – Terms of Reference (e), (f) and (h)

(e) Are there any Alternative Modifications?

(f) Should P419 be progressed as a Self-Governance Modification?

P419 should not be progressed as a Self-Governance Modification as it is likely to impact Self-Governance Criteria (b) (ii), (iii) and (c).

(h) Does P419 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?

P419 is not expected to impact the EBGL provisions held within the BSC

P419 – Standard Consultation Questions

1. Do you agree with the Workgroup's initial unanimous/majority view that P419 does/does not better facilitate the Applicable BSC Objectives than the current baseline?
2. Do you agree with the Workgroup that the draft legal text delivers the intention of P419?
3. Do you agree with the Workgroup's recommended Implementation Date?
4. Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P419 which would better facilitate the Applicable BSC Objectives?
5. Do you agree that P419 does not meet the Self-Governance Criteria and so should not be progressed as a Self-Governance Modification?
6. Will P419 impact your organisation?
7. Will your organisation incur any costs in implementing P419?
8. How long (from the point of Ofgem approval) would you need to implement P419?



INITIAL VOTING

P419 – Initial views against the Applicable BSC Objectives

- a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission License
- 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

P419 – Implementation Approach

- Proposer recommends an Implementation Date for P419 of **23 February 2023** as part of the February 2023 standard BSC Release
- Will allow the SVAA to process declarations from Suppliers before the implementation of CMP308 on 1 April 2023
- Are the Workgroup supportive of this approach?



NEXT STEPS

P419: Next Steps

| Event | Date |
|----------------------------------------------|--------------------------|
| Present IWA to Panel | 13 May 2021 |
| Workgroup meeting 1 | 23 July 2021 |
| Workgroup meeting 2 | 12 October 2021 |
| Assessment Procedure Consultation | 1 Nov 2021 – 19 Nov 2021 |
| Workgroup Meeting 3 | W/C 29 Nov 21 |
| Present Assessment Report to Panel | 13 Jan 22 |
| Report Phase Consultation | 17 Jan 22 – 28 Jan 22 |
| Present Draft Modification Report to Panel | 10 February 22 |
| Issue Final Modification Report to Authority | 16 February 22 |

A.O.B

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THANK YOU

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12 October 2021