P455 Digital Meeting Etiquette

- Welcome to the P455 Workgroup meeting 5 – we'll start shortly
- No video please to conserve bandwidth
- Please stay on mute unless you need to talk – use IM if you can't break through
- Talk – pause – talk
- Lots of us are working remotely – be mindful of background noise and connection speeds

P455 ‘On-Site Aggregation as a method to facilitate Third Party Access’

Meeting 5

12 December 2023

Meeting Agenda

- Review of the legal text

Agenda Item	Lead
1. Welcome and meeting objectives	Patrick Matthewson (Elexon) – Chair
2. Review of the legal text and redlining	Rosalind Archer (Elexon) - Lead Lawyer
3. Standard ToR Review	Jacob Snowden (Elexon) – Lead Analyst
4. Next steps	Jacob Snowden
5. Meeting close	Patrick Matthewson

REVIEW OF THE LEGAL TEXT

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2.9 Registration of Onsite Aggregation MSIDs.

2.9.1 Where a Registrant is required to register MSIDs related to customers on a License Exempt Network who have chosen not to opt for Third Party Supply, they may establish an Onsite Aggregation MSID as detailed in BSCP502.

2.9.2 Each customer included in an Onsite Aggregation MSID should be metered via Half Hourly Metering Equipment compliant to Code of Practice 10. For the avoidance of doubt, any customer that would require a meter capacity exceeding 100kW (as implied by COP 10) would not be permitted. Any non-customer loads should be metered vaj half hourly meter compliant to the relevant COP (for avoidance of doubt non-customer loads refers to asset capable of generation, e.g. storage).

2.9.3 Where the License Exempt Network has multiple feeders, the customer's comprised within the Onsite Aggregation Method connected to each feeder may be:
(a) aggregated under one Import; or one Import and one Export MSID with the agreement of the relevant LDSO ; or
(b) aggregated under one Import; or one Import and one Export MSID per independent feeder.

2.9.4 The SVA Meter Operator Agent shall provide a copy of the Onsite Aggregation Form to BSCCo following registration of, or any significant change to, an Onsite Aggregation MSID in accordance with the REC Metering Operations Schedule.

2.9.5 BSCCo will maintain a register of all Onsite Aggregation MSIDs.

2.9.6 The measurement class of the Onsite Aggregation MSID shall be:
(a) Measurement Class C where the summation of the maximum capacities of all loads comprised within the Onsite Aggregation MSID exceeds or is equal to 100kW.
(b) Measurement Class E where the summation of the maximum capacities of all loads comprised within the Onsite Aggregation MSID exceeds or is equal to 69kW but less than 100kW.
(c) Measurement Class G where the summation of the maximum capacities of all loads comprised within the Onsite Aggregation MSID is less than 69kW.

2.9.7 Where Metering Equipment associated with an MSID that is not the Onsite Aggregation MSID (related to a customer who has opted for a Third Party Supplier) is adopted into being comprised within an Onsite Aggregation MSID, or replaced with a sub-meter that shall be comprised within an Onsite Aggregation MSID, the original MSID shall be logically disconnected.

3.5.7 Onsite Aggregation Validation Test

REF	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
3.5.7.1	As appropriate	Receive request to validate Onsite Aggregation data	SVA MOA	HHDC	D0005 Instruction on Action	Electronic or other method, as agreed
3.5.7.2	Within 5WD of 3.5.7.1	Collect Metered Data and aggregate in accordance with the Onsite Aggregation rules. Send Metered Volumes from each Meter in the Onsite Aggregation Rule Send Aggregated Output of Onsite Aggregation Rule	HHDC	SVA MOA	D0003 Half Hourly Advances Email with aggregated consumption data for the day requested in 3.5.7.1	Electronic or other method, as agreed.
3.5.7.3	Within 2WD of 3.5.7.2	Validate Metered Volumes and Aggregate Output of Onsite Aggregation Rule	SVA MOA			Internal Process
3.5.7.4	Within 2 WD of 3.5.7.3 if data is validated	Send notification confirmation of both metered volumes and aggregated output of Onsite Aggregation validation rule.	SVA MOA	HHDC Supplier	D0214 Conformation of Proving Tests	Electronic or other method, as agreed.
3.5.7.5	Within 2 WD of 3.5.7.3 if data is not validated	Send notification of failure of either metered volumes or aggregated output of Onsite Aggregation Rule	SVA MOA	HHDC Supplier	D0002 Fault Investigation	Electronic or other method, as agreed.
3.5.7.6	At the same time as 3.5.7.5	Investigate discrepancy with HHDC and resolve. Proceed to 3.5.7.1	SVA MOA	HHDC	D0002 Fault Resolution Report or Request for Decision on Further Action.	Electronic or other method, as agreed.
3.5.7.7	Within 5 WD of 3.5.7.6 if remains not validated.	Proceed to the Metering System Investigation Process (3.4.3).	HHDC			Internal Process

4.9 Guide to Complex Sites and Onsite Aggregation.

A ‘Complex Site’ means; any site that requires a ‘Complex Site Supplementary Information Form’ to enable the HHDC to interpret the standing and dynamic Metered Data relating to SVA MSs for Settlement purposes to be provided to the HHDC in addition to the D0268 Half Hourly Meter Technical Details.

The primary electronic data flow between the SVA MOA and HHDC for Half Hourly MTD is the D0268 data flow. In the case of Complex Sites, this data flow alone is insufficient to accurately describe to the HHDC how to allocate the various channels of data that should be utilised in Settlements, therefore the D0268 data flow is supplemented with the ‘Complex Site Supplementary Information Form’.

The SVA MOA should identify a Complex Site by providing a ‘Complex Site Supplementary Information Form’ in addition to the D0268 data flow to the HHDC and Supplier and indicating in the D0268 data flow that the site is complex. This action shall alert the HHDC to expect a ‘Complex Site Supplementary Information Form’ from the SVA MOA containing details of how to configure the data collection requirements and passing of information to the HHDA and Supplier. The ‘Complex Site Supplementary Information Form’ should be sent electronically or by any other method agreed. Where a Complex Site comprises multiple feeders an updated Complex Site Supplementary Information Form shall be sent following any change to the status of one or all feeders.

For the avoidance of doubt, where the MOA has indicated that a Metering System is Complex, then the Complex Site Supplementary Information Form shall be mandatory and the Complex Site mapping details shall not be provided by any means other than the Complex Site Supplementary Information Form.

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4.9.3 Customers on a Licence Exempt Distribution (Private) Networks requiring Third Party Access for a Supplier of their choice

This is an example where one or more customers within a Licence Exempt Distribution Network are supplied with electricity by a third party licensed Supplier and therefore customer have their own MSID. There are three ~~two~~ ways the BSC can accommodate this:

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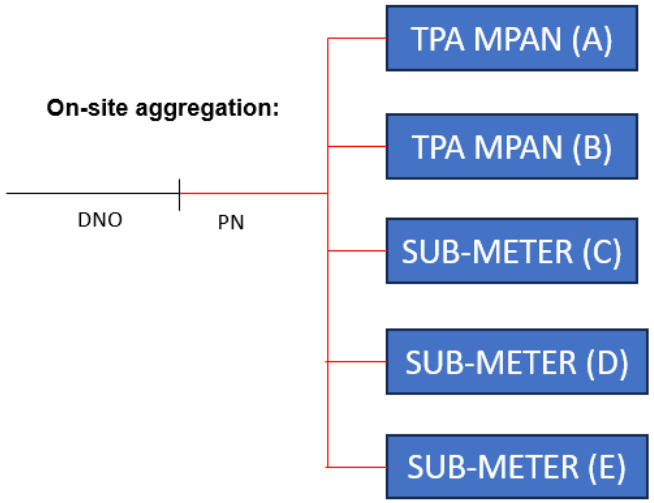
Added:

Onsite Aggregation

Onsite Aggregation is concerned with the aggregation of the metered volumes of the connections on the License Exempt Network for which the Supplier associated with the License Exempt Network is responsible (I.E those connections related to customers who have not chosen to be Supplied via Third Party Access.

Section L x.x details the criteria under which Onsite Aggregation is allowable to be applied.



BSCP502 – Review of the proposed legal text

The above example illustrates a License Exempt Network where two customers have opted to be Supplied via Third Party Access and the remaining customers are Supplied via the License Exempt Network operator (or a related party).

Onsite aggregation requires the aggregation of the metered volumes for each "sub Meter" under one Import MSID. Therefore, the Onsite Aggregation Rule for the above example would be (C) + (D) + (E).

Similarly to the Full Settlement Solution, under the Onsite Aggregation method all entry and exit points on the License Exempt Network are metered. This means the Defined Metering Point becomes the point of connection to the License Exempt Network as opposed to the Total System and therefore a Metering Dispensation will not be required.

All sub Meters involved in the Onsite Aggregation must be Half Hourly Settled and compliant to Code of Practice 10. However, under this method, the Onsite Aggregation MSID is completely independent from the Third Party Access MSIDs and so there is no requirement to appoint the same Supplier Agents across the whole License Exempt Network.

The SVA MOA associated with the Onsite Aggregation must maintain the Onsite Aggregation Form and should mark the Complex Site Indicator within the D0268 to "T". As such, the HHDC should expect either a Complex Site Supplementary Form or an Onsite Aggregation Form where the Complex Site Indicator is marked as "T". For the avoidance of doubt, for a site with on-site aggregation applied, only an Onsite Aggregation Form is required.

BSCP502 – Review of the proposed legal text

Export on Licence Exempt Distribution Network

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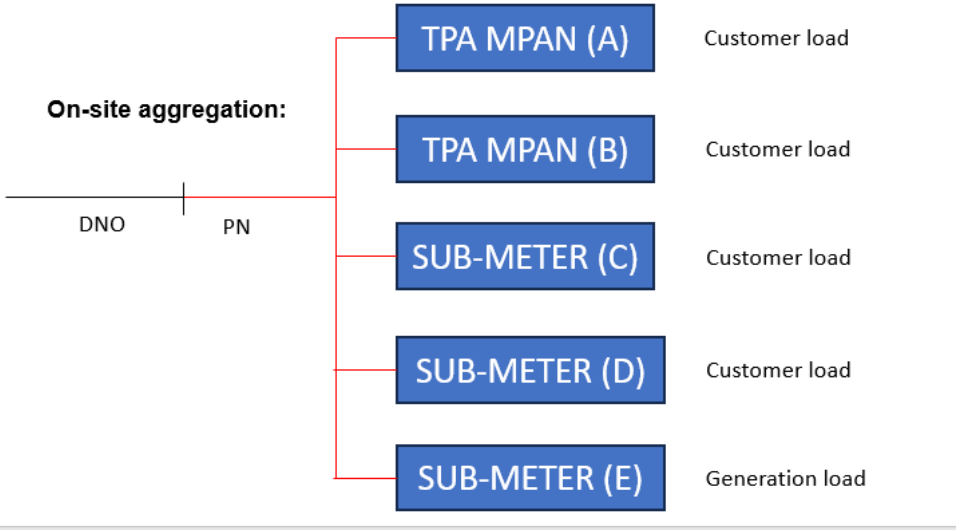
Onsite Aggregation

In some cases, there may be generation assets located on the License Exempt Network for which the License Exempt Network Operator is responsible for; and is using to Supply the customers under the Import onsite Aggregation method. Under this arrangement, it will be necessary to register two MSIDs associated with the Onsite Aggregation; one for Import and one for Export.



Using the above example there is a generation asset, which is metered by Sub Meter (E). The Aggregation Rule in this instance would be: E (AE-AI) – (C+D). Where the resultant of the rule is negative, it should be assigned to the Import MSID. Where the resultant of the rule is positive, it should be assigned to the Export MSID.

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STANDARD TOR REVIEW

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P455 standard Terms of Reference

ToR	Details	How?
n)	How will P455 impact the BSC Settlement Risks?	There are potential risks to Risk 1 (Registration), 7 (Retrieval), 18 (revenue protection). This is largely due to the threat that unmetered load is not identified. This has been reviewed and discussed in the group. I believe that the potential impact will be low, given the frequency of sites and the limitation to being sub-100kW. Unmetered load testes are not required on other sites, so this is not unique.There is a further risk around Risk 16 (Energisation status), through the disconnection process.
o)	What changes are needed to BSC documents, systems and processes to support P455 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?	As we seen before, Section K and BSCP602 should be modified.
p)	Are there any Alternative Modifications?	No
q)	Should P455 be progressed as a Self-Governance Modification?	No. Since P455 materially impact the BSC, an Authority decision is required
r)	Does P455 better facilitate the Applicable BSC Objectives than the current baseline?	Positive on the Applicable BSC Objectives c) and e) Neutral on the Applicable BSC Objective d)
s)	Does P455 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?	No
t)	Does P455 impact MHHS?	Yes. A Change Request is needed.

NEXT STEPS

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Progression plan

Event	Date
Present IWA to Panel	8 June 2023
Workgroup meeting 1 – Background and introduction to the process. Why is a new solution needed?	12 September 2023
Workgroup meeting 2 – Does the new solution work? Evidence from Emergent's Sandbox	31 October 2023
Workgroup meeting 3 – How will the solution work in detail? Validate the proposed solution	22 November 2023
Workgroup meeting 4 – Remaining ToR	27 November 2023
Workgroup meeting 5 – Review of legal text and standard ToR	**12 December 2023**
Assessment Procedure Consultation (15 WDs)	15 December 2023 – 16 January 2024
Workgroup meeting 6	End of January 2024
Present Assessment Report to Panel	February 2024
Report Phase Consultation	12 February 2024 – 23 February 2024
Present Draft Modification Report to Panel	March 2024
Issue Final Modification Report to Authority	March 2024

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THANK YOU

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27 November 2023