P459 Workgroup Meeting 1 Summary

Summary

1. Meeting Objectives

The Chair welcomed attendees and presented the meeting objectives:

- present the background for this problem and proposed solution;
- estimate a progression plan.

2. Presentation of the Issue and Proposed Solution

2.1 The Proposer started by apologising for the delay to start the assessment procedure. Then he continued by presenting the Issue:

2.1.1 Microgeneration is a very important part of the UK's electricity system as a way for customers to reduce their bills and contribute to lowering emissions by exporting renewable power.

2.1.2 But current regulations in the BSc and the Rec we feel mean that these opportunities cannot be fully leveraged or achieved in a compliant manner. That's leading to reduced customer choice and therefore reduced incentive to invest in low carbon generation technologies and actually higher bills for UK bill payers.

2.1.3 At present, Export Suppliers must appoint the same Supplier Agents as Import Suppliers. This is set in REC Schedule 14 and in the BSCP502, but the exact Section needs to be confirmed by Elexon. Given that customers can switch their Import Supplier without switching their Export Supplier, Export Suppliers need to secure terms with all agents in the marketplace. For example, where there is very small end of the Power Purchase Agreement (PPA) market, we can we see where automatic meter reading (AMR) metering is replaced with smart metering or where agents have been aligned despite having separate Import/Export Suppliers, the Import Supplier could entered the Supplier of Last Resort (SoLR) process. As there is no obligation for Agents to contract with Suppliers, and many might not have a financial interest in doing so, they could either refuse or simply insist on commercial terms which would render any offering
And that might be because they are a single Supplier Agents or they do not have system set up to provide that service. The result is anti-competitive environment.

2.1.4 Good Energy proposes that suppliers should be able to appoint a Supplier Agent of their choice to an Export MSID irrespective of the Supplier Agent appointed to the Import MSID for DCC adopted smart meters.

2.1.5 The Workgroup should consider the relationship between the appointed Agents and their respective responsibilities concerning the meter: any processes that would be required to facilitate necessary flows of information between agents and their suppliers, and any data considerations to ensure that we are designing a solution that does not allow a party to access data that they are not entitled to. An appropriate solution could be delivered utilising some existing industry arrangements, so the Workgroup should look to define the scenarios in which misaligned agents could result in compromising data.

2.2 As additional context, the Proposer explained that in 2022 Good Energy raised a request for a BSC Sandbox Application and Ofgem Innovation link to demonstrate that different agents could be appointed as Import/Export Suppliers. The request was rejected by the BSC Panel who believed the solution should be explored through the Modification Assessment Procedure.

2.3 Then the Proposer presented the potential benefits of implementing P459.

2.4 A Workgroup member noted that some of these issues were explored during Issue 91 and recognises the relevance of the identified problem. However, they may be some challenges of having two different agents responsible for the same meter and keeping that data aligned. Also, the member believed that the MHHS design requires that the same agents are appointed to the same metering service. So the Import/Export will be linked and automatically appointed to the same agent. Therefore, MHHS will address this issue.

2.5 A member from the MHHS Programme confirmed that the MHHS design restricts the ability to appoint different Agents.

2.6 Another WG member noted allows to smart data services to be appointed across Import/Export but not two separate MEMS. In addition the MEMS will be automatically appointed with no opportunity to object. He also noted that MHHS goes live in 2025 and there is a code change freeze. Hence, any solution developed for P459 should be a MHHS solution. And if the Proposed Solution is to appoint two different MEMS, this will required a significant REC change process and then a MHHS technical change.

2.7 Elexon noted that the MHHS Code drafting, currently under review, states that the data services need to be the same, therefore confirming the need to modify the MHHS Code to implement the Proposed Solution. This will be reconfirmed by the MHHSP representative (rep) and as an action Elexon and the MHHSP will review the P459 impacts on MHHS to suggest the most appropriate way to move forward.

2.8 The REC representative then suggested two routes for P459:

2.8.1 consider P459 as a change impacting MHHS, which implies having MHHS Change Request and a reassessment of the impacted parties; or

2.8.2 it is a post MHHS change which would need to be introduced after April 2025 and needs to understand the impact on parties qualifications. If it impacts on parties qualifications, the change may need to wait until every party is migrated after the 2026 go live date.

2.9 The Proposer explained that he does not believe that MHHS solves the issue completely, and that his preference would be to design a solution that does not need to be implemented on 2026. The MHHSP rep confirmed that the programme will not deliver the Proposed Solution, and that the MHHS change freeze should not stop an assessment procedure from developing a solution that could be implemented after the go live date.

2.10 A member noted that some of the issues identified do not sit within the BSC, like the commercial aspect of the problem that impact how customers are charged.

2.11 Elexon then highlighted that the June and November 2024 Releases are at capacity, so any solution will need to be implemented on 2025 or later on.

3. Review of Terms of Reference

3.1 Elexon presented the Standard and Specific P459 Terms of Reference (ToR) and asked if anyone wanted to add another point.

3.2 A WG member noted that some of the ToR do not sit under the BSC scope, and that it would be helpful to add a DCC to the WG to address some of the specific ToR. But since this is a Cross-Code change, it was explained that the ToR were written having all the impacted Codes in consideration.

3.3 Another WG noted we need to include the exploration of the responsibility for fault management if two different agents are appointed, how the change of energisation process will work across two MEMs, and who will be the actual owner of the meter.

3.4 The sharing of the metering costs was also noted to be included.

4. Discussion on the Applicable BSC Objectives and next steps

4.1 The Proposer presented the identified impacts on the Applicable BSC Objectives, but it was noted that, since the solution is currently under development, it would be best to wait to consider its impacts.

4.2 Regarding the next steps and progression plan, the REC analyst explained the basic steps for a REC Change, but it was stated that both the BSC and the REC progression plans will need to be re-drafted once the route for P459 is agreed.

Actions

No.	Workgroup raised	Action	Owner

1.	WG1	To explore if a MHHS Solution is needed or if we can keep the Proposed Solution as it is and modify the MHHS later on.	Elexon, MHHSP and Good Energy