



Erroneous Transfers (Action 05/11)

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Action 05/11 - The Issue (1)

- *ELEXON to consider the potential for, and process to correct, Erroneous Transfers (ETs) under the TOM.*

The actual essay question is:

- What process, if any, should be used to correct Settlement Data following the completion of the Erroneous Transfer process?
- The REC resolution process is set out here:
https://www.ofgem.gov.uk/system/files/docs/2019/06/rec_resolution_of_cfsb_problems_schedule_0.pdf
- 3.9 suggests that there should be a process for correcting Settlement Data:
Energy Suppliers shall ensure that any incorrect data associated with the Consumer and/or other premises (**including incorrect settlement data**) is corrected and updated on the relevant central systems in a timely manner to ensure that these do not cause any detriment to the Consumer in the future.
- So it looks like a process will be required

Action 05/11 - The Issue(2)

- The CCDG has considered that the SMRS data should be the 'single view of the truth'
- However, SMRS data is not retrospectively corrected following resolution of the ET
- In fact no backdated changes to registration data are allowed by the CSS. The 'incorrect' Supplier will remain as the registered Supplier in the CSS (and therefore the Settlement registration systems) for the period of the ET
- Billing data is amended by the two Suppliers, so the customer is billed continuously by their original Supplier as if the switch never happened, but the ET period will remain in the registration systems against the 'wrong' Supplier
- This means that if the erroneous Supplier's Data Service has not provided data for a smart Meter there will be no data in Settlement to correctly allocate for the duration of the ET process
- On regaining the MPAN the Supplier's SDS cannot get the Meter data since it would not be deemed to be appointed for that period

Action 05/11 – Retrospective Amendments

- Although Settlement data can be retrospectively amended in SMRS (such as energisation status), registration data sourced from the CSS (Supplier ID, EFD/ETD) can't be as the CSS does not allow for retrospective amendments
- The below is taken from the amendments to MAP04 for switching go live, which shows those two items in MPAD being removed from the process. This will be what is reflected in the new BSCP603 when CSS goes live



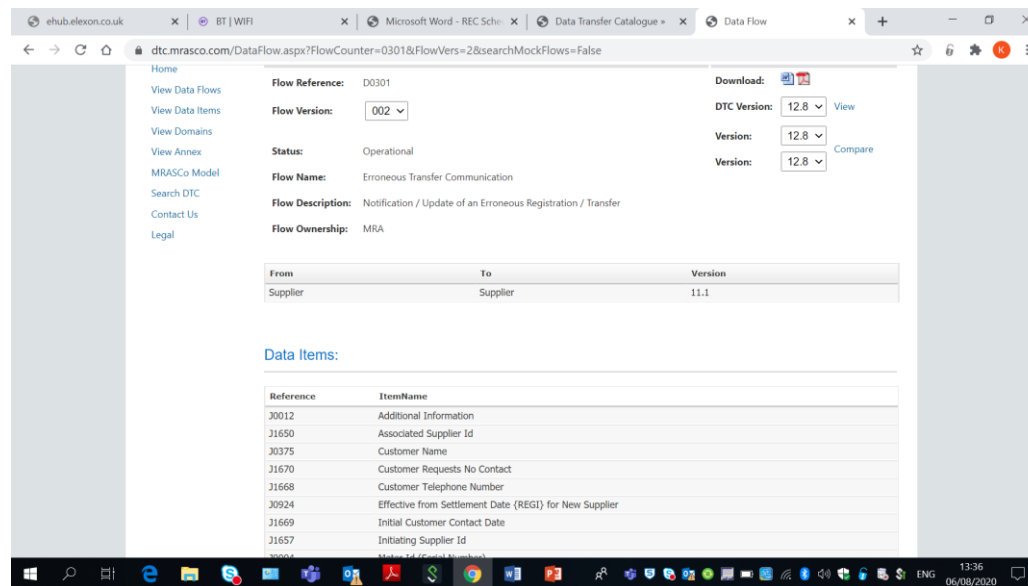
MPAD Item No.	Data Item	Responsibility for provision and maintenance
4	Profile Class Id	Supplier
4A	Effective from Settlement Date (MSPC)	Supplier
5	Meter Timeswitch Code	Supplier
5A	Meter Timeswitch Code Effective <u>From</u> Date	Supplier
6	Line Loss factor Class Id	Distribution Business
6A	Effective from Settlement Date (MSLLFC)	Distribution Business
8	Supplier Id*	Supplier
10	Effective from Settlement Date (REGI)*	Supplier
11	Meter Operator Id	Supplier
11A	Meter Operator Type	Supplier
11B	Effective <u>From</u> Date (MOA)	Supplier
12	Data Collector Id	Supplier
12A	Data Collector Type	Supplier
12B	Effective <u>From</u> Date (DCA)	Supplier
13	Data Aggregator Id	Supplier

Action 05/11 – Retrospective Amendments

- The BSCP603 change will impact the ability to use retrospective amendments for ETs, correcting erroneous registrations for new connections and correcting invalid de-registrations
- The latter is the only case that presents a risk to Settlement, as it can create a period with no Supplier, and no way to settle consumption that occurred during that period

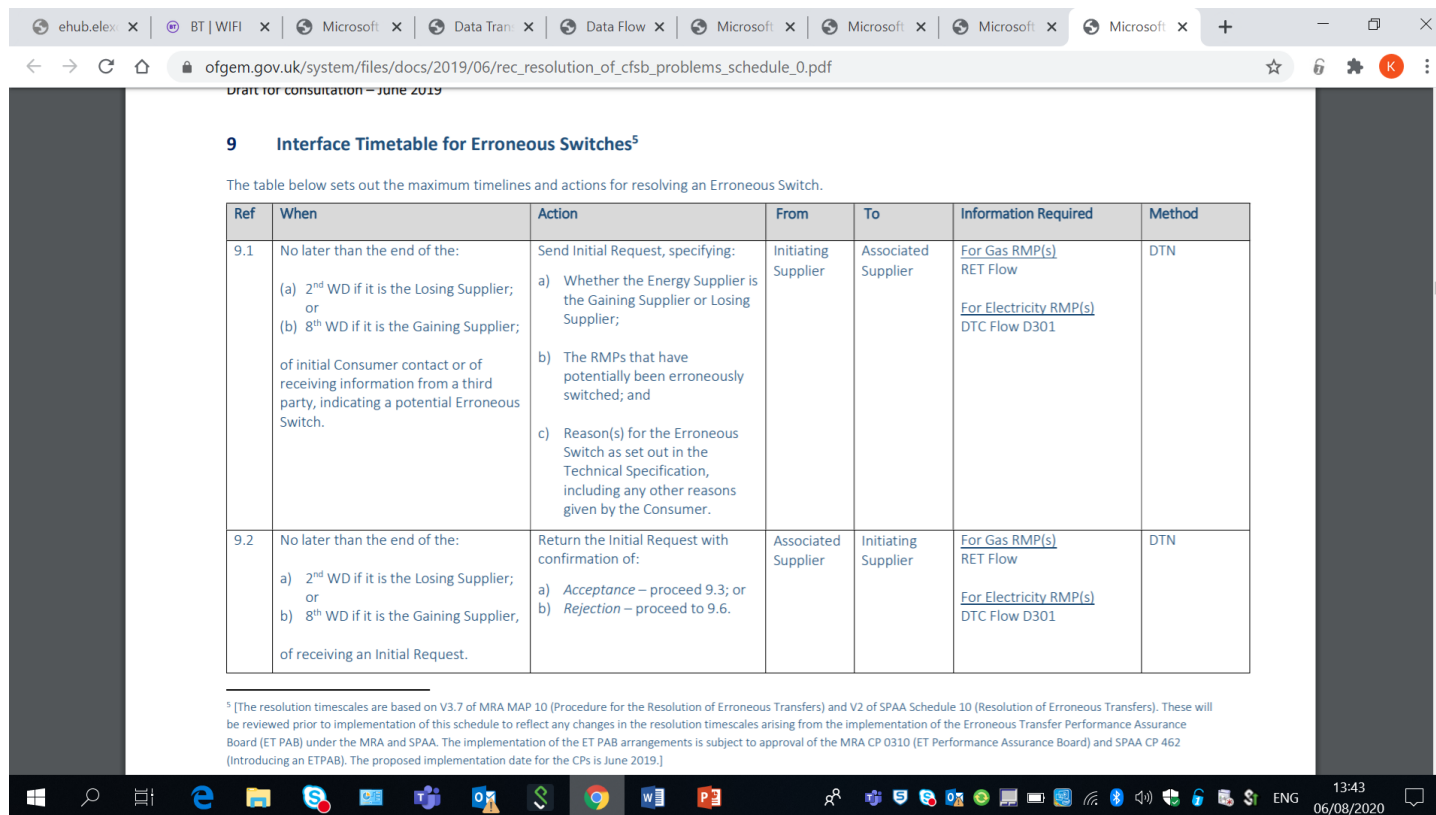
Action 05/11 - Options

- Provided the BSC Central System view of the Supplier and its EFD is correct, and there is consumption or export data for the period, it will be settled correctly regardless of which party provided data to Settlement during the ET resolution period
- So ideally some Pseudo Registration data needs to be provided to BSC Central Systems in the scenarios identified
- This raises the questions of who, how and when this data is provided
- The D0301 is used to communicate the ET between Suppliers:



Action 05/11 - Options

- The ET resolution processes are set out in Section 8 and 9 of the resolution document:



9 Interface Timetable for Erroneous Switches⁵

The table below sets out the maximum timelines and actions for resolving an Erroneous Switch.

Ref	When	Action	From	To	Information Required	Method
9.1	No later than the end of the: a) 2 nd WD if it is the Losing Supplier; or b) 8 th WD if it is the Gaining Supplier; of initial Consumer contact or of receiving information from a third party, indicating a potential Erroneous Switch.	Send Initial Request, specifying: a) Whether the Energy Supplier is the Gaining Supplier or Losing Supplier; b) The RMPs that have potentially been erroneously switched; and c) Reason(s) for the Erroneous Switch as set out in the Technical Specification, including any other reasons given by the Consumer.	Initiating Supplier	Associated Supplier	For Gas RMP(s) RET Flow For Electricity RMP(s) DTC Flow D301	DTN
9.2	No later than the end of the: a) 2 nd WD if it is the Losing Supplier; or b) 8 th WD if it is the Gaining Supplier, of receiving an Initial Request.	Return the Initial Request with confirmation of: a) <i>Acceptance</i> – proceed 9.3; or b) <i>Rejection</i> – proceed to 9.6.	Associated Supplier	Initiating Supplier	For Gas RMP(s) RET Flow For Electricity RMP(s) DTC Flow D301	DTN

⁵ [The resolution timescales are based on V3.7 of MRA MAP 10 (Procedure for the Resolution of Erroneous Transfers) and V2 of SPAA Schedule 10 (Resolution of Erroneous Transfers). These will be reviewed prior to implementation of this schedule to reflect any changes in the resolution timescales arising from the implementation of the Erroneous Transfer Performance Assurance Board (ET PAB) under the MRA and SPAA. The implementation of the ET PAB arrangements is subject to approval of the MRA CP 0310 (ET Performance Assurance Board) and SPAA CP 462 (Introducing an ETPAB). The proposed implementation date for the CPs is June 2019.]

- The outcome is agreed between the **Initiating Supplier** and the **Associated Supplier**

Action 05/11 - Options

- Any solution will need to be proportionate in cost v accuracy terms
- So, the Pseudo registration data could be provided by the **Initiating Supplier** or the **Associated Supplier**, or both, following resolution of the ET (potentially using a cut-down version of the D0301?). This would require the Supplier to interface with BSC Central Systems for this purpose (is this proportionate?)
- The **CSS Provider** will be informed by the losing Supplier and is therefore a candidate to provide the Pseudo registration data (but CSS changes and new interfaces do not seem proportionate to resolution of this issue either)
- The **Registration Service (SMRS)** will not be aware of the issue other than the switch back to the losing Supplier at a later EFD from the CSS. SMRS could be informed by the losing Supplier but it would not have any incentive to do so! The erroneously gaining Supplier potentially would though to avoid being allocated the Settlement data. In either scenario the data would need to be passed through SMRS to BSC Central Services, but not updated in SMRS
- Are there any options not considered (other than do nothing)?

Action 05/11 - Timescales

- The ET process can work up to 24 months and there will only be a 4 month Settlement window
- So any Settlement resolution will need to be time limited
- After 4 months the data could only be corrected by a Trading Dispute but is unlikely to reach the new Materiality Thresholds

