

PAB209/07 – COMMISSIONING UPDATE

MEETING NAME Performance Assurance Board

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Purpose of paper Information

Classification Public

Summary This paper provides an update on the work to address issues around the Commissioning process. It also contains information on planned future work. This will be the final update as all of the work streams planned to address the issues identified around Commissioning are now underway and updates will be provided by other means as appropriate.

1. Introduction

1.1 At its September 2016 meeting, the Performance Assurance Board (PAB) requested that ELEXON provided ongoing updates on any work relating to Commissioning. The tables in this paper indicate whether the work has been created from or is related to the application of one of the Performance Assurance Techniques (PATs), its progress and if it has been completed.

2. Commissioning work update

2.1 The table below provides a summary of the work that is in progress in relation to Commissioning and any of the PATs that it relates to. Items in the table are ordered and grouped by PAT. All new updates are indicated (**Update:**):

2.2 Column now included with timescales for each action.

What	PAT	Action	Update	Timescales
TAA specific sample for 2017/18	TAM	TAA to repeat the specific sample in 2017/18 on sites connected since P283 implementation (6 November 2014).	<p>ELEXON presented a paper to the PAB in December 2016 where the PAB approved the specific sample for 2017/18. The sample will focus on sites where Metering Equipment has been installed post P283 implementation. In addition to reporting the findings in the Technical Assurance Agent Management Tool (TAAMT), where a category 2.15 Commissioning non-compliance is identified the TAA will keep a spreadsheet to record the owner of the Metering System (LDSO or customer) and which part of the commissioning documentation is missing (Part A, Part B or both). The TAA presented its findings to the PAB at the end of the 2017/18 audit year and ELEXON will keep the PAB updated on the P283 specific sample throughout the audit year.</p> <p>The specific sample was introduced in April 2017 and will run over the course of the audit year.</p>	Completed.

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			The results of the visits are now presented to the PAB in the Quarterly Technique Progress Report (TPR). This worksteam will be transferred to the completed section of this paper next quarter.	
TAA non-compliance allocation	TAM	With changes to obligations brought in by Modification P283, ELEXON is looking to change which Party the TAA non-compliances are allocated to. This means the best positioned Party or Agent can resolve the non-compliances.	ELEXON presented a paper to the PAB in December 2016 with an option to record additional details for commissioning non-compliances outside of the TAAMT. The additional information recorded would include which part of the commissioning documentation is missing (LDSO Part A or MOA Part B). The PAB rejected the proposed change as it was felt that the work being carried out following the P283 TAPAP checks was already providing this evidence. The TAA audit main sample will continue to allocate identified category 2.15 non-compliances for commissioning to the MOA in all cases.	Completed.
Alternatives to CT/VT certificates	TAM	A large number of TAA category 2 non-compliances relate to missing records, one of which is CT/VT calibration certificates. TAMEG members have asked for alternatives to be looked at that provide the same level of assurance in the absence of these documents.	<p>During the June 2017 TAMEG meeting, ELEXON presented a paper to the TAMEG on the merits of providing Meter calibration certificates to the TAA at site inspections.</p> <p>TAMEG members discussed certificates and various other ways of gaining assurance. TAMEG members felt it would be best to continue the discussion in a Working Group with a view to finding alternatives to be looked at that provide the same level of assurance in the absence Meter calibration certificates.</p> <p>The first Working Group meeting was held on 18 July. The following points were discussed during the meeting:</p> <ul style="list-style-type: none"> • Chasing paperwork which may not exist is not beneficial • It is not cost justified to replace CT/VTs for missing paperwork • The major risk to settlement is CT/VT ratio errors which will often not be resolved through paperwork evidence <p>ELEXON, the working group and the TAA continue to work on follow up actions from the meeting. Once these actions have been completed the next workgroup will be scheduled. Updates on these actions and progress was provided to the PAB in the Quarterly TPR presented in October 2017.</p>	<p>ELEXON to work with the TAMEG on this action over the 2018/19 audit year.</p> <p>Updates will be provided to the PAB via the TPR.</p>

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P283 education day	TAPAP	It was evident from our findings that there is still some confusion around the P283 obligations and how to achieve these within the current business processes of each company.	<p>A P283 education day was run in February 2016. ELEXON will plan another education day to detail timescales introduced with CP1458, implemented November 2016.</p> <p>The next education day was planned to run in line with the implementation of the new flows.</p> <p>This education day took place on 7 June 2018.</p>	<p>Completed 7 June 2018</p> <p>Future Education days may be scheduled based on demand.</p>
Commissioning records	TAPAP	During the P283 TAPAP check it was evident that Commissioning records across industry were inconsistent. ELEXON looked at creating a standard template for Commissioning records.	<p>A strawman has been created. Next step is for an internal review.</p> <p>The review now will include assessment of whether this is still required with the introduction of dataflows for the communications obligations instead of the sending of Commissioning records.</p>	<p>Completed data flows being progressed. Implementation 1 November 2018.</p>
Newscast	TAPAP	The recent P283 TAPAP revealed that many Parties and Supplier Agents were not fulfilling their Commissioning obligations. A Newscast article to be sent to industry as a reminder of the obligations for Commissioning in CoP4.	This will be tied in with the invite to the education day and the dataflow implementation.	<p>Completed. Newscast published ahead of the 7 June 2018 Education day.</p>
Consider including Commissioning in the Qualification process for new DNOs and MOAs.	TAPAP	The recent P283 TAPAP checks have led to a question around whether new DNOs and MOAs should go through a Qualification process to demonstrate that they are able to fulfil their CoP4 obligations.	<p>This was presented to PAB along with PAB paper PAB195/04 – Meter Operator Agent Qualification. This paper was deferred pending consultation with the Association of Meter Operators (AMO) around the MACOPA element of the paper which took place and revisited in June 17.</p> <p>The Commissioning element of the paper has been separated from the work regarding MACOPA. ELEXON will now assess whether to raise a separate Change Proposal to include Commissioning into the Qualification process for DNOs and MOAs.</p>	ELEXON will assess the requirement for this change by end of 2018.

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P283 guidance document review	TAPAP	ELEXON to perform a review of the P283/Commissioning guidance document.	<p>A first draft has been created for internal review.</p> <p>This review will now be planned to run in line with and include detail around the implementation of the new flows and also revised timescales for the Commissioning process.</p> <p>Update: This will now also include the publishing of guidance around new Commissioning data flows, CP1496/1497 (implementation 1 November 2018)</p>	End of July 2018
Commissioning dataflow	TAPAP	<p>Feedback from the P283 TAPAP checks suggested that a Data flow for the communications obligations within the P283 Commissioning process is needed as currently, PDFs of commissioning records and Commissioning status notifications are passed by email which is time consuming and difficult to audit.</p> <p>Due to this ELEXON has developed new data flows and they will be implemented into the Commissioning processes from November 2018.</p> <p>MRA change proposal DTC CP 3522 creates two new dataflows. These are the "DAXXX – Notification of Commissioning Information" which is a replacement for</p>	<ul style="list-style-type: none"> • September 2016: IREG update on flow objectives. • October 2016: A technical expert workgroup meeting held to work on flows. • November 2016: IREG update given on progress. • December 2016: A technical expert workgroup meeting was held to continue flow development. ELEXON also met with an IREG member to go through the structure of the flow. • January 2017: IREG update given. • February 2017: IREG update given. • March 2017: Joint IREG/BSC workgroup meeting • April 2017: Update to IREG given • May 2017: Joint IREG/BSC workgroup meeting • Also an update to IREG given in May as well as discussion on one of the data items. • June 2017: MOA meeting held to discuss the MOA-MOA dataflow. Also this month a joint meeting to further develop the complete set of flows was held with all members. We now have 3 flows almost agreed between all Parties involved. The next step is to finalise the flow data items and then agree the process around the sending of the flows and outline what happens when there are exceptions to the standard process. This will then dictate what BSC changes may need to be done to the BSCPs and CoP4. • August 2017: Meeting held with all Party types. Dataflow structure was finalised with both Commissioning flows as well as an additional flow to address issues around the D0170/D0215 process. • Update was given to IREG at its August meeting. • September 2017: MRA and BSC changes are being raised. 	<p>Guidance - End of July 2018</p> <p>Data flow implementation – November 2018</p> <p>On-going ELEXON support to be provided on demand and on an ad-hoc basis.</p>

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	<p>the passing of commissioning records and is designed to give the MOA enough information to complete their commissioning obligations. DTC CP 3522 also creates the "DBXXX – Notification of Commissioning Status" which is a replacement for the notification of defect/omission email that MOAs send to Suppliers and can be used as an "action flow" for parties to communicate actions needed to be taken to resolve any defect/omission that has prevented commissioning. It is also used for MOAs to inform Suppliers that commissioning has been completed.</p> <p>BSC change proposal CP 1496 introduces the aforementioned data flows into the New Connection process (BSCP514 (MOA) and BSCP515(LDSO)). This CP also extends the timescales given to an MOA to complete</p>	<ul style="list-style-type: none"> • ELEXON held an education day on the dataflow changes on 7 June 2018. • ELEXON will also be publishing new guidance notes released to aid with the commissioning process post November 18. These are currently scheduled to be released by the end of July 2018 (as well as amending the currently existing guidance notes). 	
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		<p>commissioning and clarifies that the obligation to resolve any defect/omission is placed on the Supplier. This CP also makes changes to CoP4 to remove the requirement for an LDSO to pass physical commissioning records to the MOA.</p> <p>BSC change proposal CP1497 introduces the commissioning dataflows into the Change of Agent process in BSCP514. This will ensure that commissioning data, where available, is sent from MOA to MOA as the BSCP requires.</p>		
P283 EFR (SVA)	EFR	<p>19 DNOs (14 LDSOs, five IDNOs), 12 HH MOAs and two Suppliers were checked in a P283 Commissioning TAPAP check and all but one were found non-compliant. The non-compliant Parties and Supplier Agents are now in EFR to address the non-compliances.</p>	<p>Update: All non-compliant Parties are in EFR with reporting and milestones for the P283 Commissioning process agreed.</p> <p>22 exit checks have been completed:</p> <ul style="list-style-type: none"> • 4 MOA and 2 Suppliers have now exited EFR • 5 LDSOs, 1 IDNO and 6 MOAs will remain in EFR with further milestones to complete <p><i>(Note some parties have been through multiple unsuccessful exit checks.)</i></p>	

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3. Work completed

3.1 The table below provides a summary of the work completed in relation to Commissioning and any of the PATs that it relates to. The most recently completed items are listed at the top of the table marked with an update with items ordered and grouped by PAT. Where there has been no update since the last paper, no update is highlighted but a record of items completed so far is shown in the table below:

What	PAT	Action	Update
CoP4 refinement	No PAT related to this piece of work. It arose through the dataflow workgroup discussions.	Feedback from industry has been that Code of Practice 4 has some areas where Parties' and Agents' obligations need to be more specific and that CoP4 should be fleshed out to address this.	ELEXON has asked industry to raise a BSC Issue to define a clear scope for a CoP4 review.
BSC Audit on Commissioning	BSC Audit	To enable P283 to be fully effective, there is appetite to include Commissioning in the BSC Audit. CP1458 which introduced timescales for the Commissioning progress has been in place since 3 November 2016. These timescales will be used to audit against sites connected after its implementation. Sites connected before implementation of the timescales will be judged against 'reasonable endeavours' to Commission before the site becomes effective in Settlement.	Commissioning was included in the scope of the BSC Audit which took place in the 2016/17 audit year. All BSC Audit checks have now been completed and were presented to the PAB in May 2017. BSC Audit findings relating to Commissioning have been noted in the 2016/17 and 2017/18 BSC Audit reports.
CVA Commissioning TAPAP	TAPAP	After the results of the P283 TAPAP on SVA Commissioning, we are considering whether a TAPAP check needs to be performed on CVA Commissioning.	With the TAA annual report revealing that the CVA market and its Commissioning was not a concern, this check is no longer planned.
P283 Timescales	TAPAP	The P283 TAPAP checks indicated that timescales are required for the P283 Commissioning process activities.	Assessment Report for CP1458 was presented to SVG on 6 September 2016 and approved for implementation on 3 November 2016.

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P283 TAPAP (SVA)	TAPAP	TAPAP checks were performed during September 2015 and April 2016 on 14 LDSOs, five IDNOs, 12 HH MOAs and two Suppliers. The checks reviewed performance against obligations introduced with Modification P283.	All but one organisation were found to be non-compliant. Audit reports have all been issued and agreed and the results were presented to PAB in December 2015 and February 2017.
P283 TAA specific sample 2015/2016	TAM	Onsite TAA checks on sites that sit under P283 Commissioning process.	All site visits have been completed and were reported to PAB in May 2016 and the Panel in June 2016.
DNO and MOA engagement on TAA specific sample from 2015/2016	TAM	ELEXON to engage with LDSOs and MOAs to resolve identified non-compliances.	This is linked to the work done on TAA non-compliance allocation and will run in parallel. Analysis has been completed and the next step is to contact relevant Parties regarding the reasons for the non-compliances.

4. Recommendations

- 4.1 The PAB is invited to:
- a) **NOTE** the update provided.

Appendices

Appendix 1 – Glossary

For more information, please contact:

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Appendix 1

Glossary

BSCP	Balancing and Settlement Code Procedure
CoP4	Code of Practice 4: The Calibration, Testing and Commissioning Requirements of Metering Equipment for Settlement Purposes
CP1458	CP1458 Introduction of timescales for the P283 Commissioning process for SVA CT operated Metering Systems
CT/ VT	Current Transformer/ Voltage Transformer
CVA	Central Volume Allocation
DNO	Distribution Network Owners
EFR	Error Failure Resolution
IDNO	Independent Distribution Network Owners
LDNO	Licensed Distribution Network Owners
MOA	Meter Operator Agent
Modification P283	P283 Reinforcing the Commissioning of Metering Equipment Processes
PAF	Performance Assurance Framework
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
TAA	Technical Assurance Agent
TAAMT	Technical Assurance Management Tool
TAM	Technical Assurance of Metering
TAMEG	Technical Assurance of Metering Expert Group
TAPAP	Technical Assurance of Performance Assurance Parties