

RECOMMENDATIONS IN RESPONSE TO THE TECHNICAL ASSURANCE AGENT (TAA) ANNUAL REPORT

MEETING NAME	Performance Assurance Board
Date of meeting	26 July 2018
Paper number	PAB210/13
Owner/author	Kat Higby
Purpose of paper	For Decision
Classification	Public
Summary	ELEXON's Recommendations in response to the Technical Assurance Agent (TAA) Annual Report

1. Background

- 1.1 The Technical Assurance of Metering (TAM) technique monitors compliance with the Half Hourly (HH) Metering System requirements, as documented in the Balancing and Settlement Code (BSC) and its Subsidiary Documents which include Balancing and Settlement Code Procedures (BSCPs) and Metering Codes of Practice (CoPs). When HH Metering Equipment is first registered, it must comply with the requirements which are set out in the relevant CoP in place at that time. ELEXON contracts the TAA (C&C Group Plc) to facilitate the TAM technique.
- 1.2 At the May 2018 Performance Assurance Board (PAB) meeting (PAB208), the TAA presented its annual report for 2017/18 which provided its opinion on the health of the HH Metering System population in both the Supplier Volume Allocation (SVA) and Central Volume Allocation (CVA) markets. The audit findings highlighted two key issues which are impacting the health of the markets. These issues are:
 - Commissioning and Commissioning Records; and
 - Measurement Transformer Calibration Certificates.
- 1.3 The TAA presented its annual report to the BSC Panel at its June 2018 meeting (Panel 279). The Panel noted the TAA Annual Report.
- 1.4 The two identified market issues are set out below alongside:
 - the recommendations from the TAA;
 - ELEXON's comments on each recommendation; and
 - ELEXON's recommendations on each issue.

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2. Issue 1 – Commissioning and Commissioning Records

TAA Recommendations on SVA Commissioning and Commissioning Records

2.1 The TAA provided three recommendations for consideration which, along with ELEXON’s comments, are set out below:

Ref	TAA Recommendation	ELEXON Comments and Recommendations
1.	<p>The scope of the TAA audit has changed as of 01 April 2018. Commissioning non-compliance data will now be available for pre and post P283¹ SVA Metering Systems.</p> <p>The TAA will monitor the results of the 2018/19 audit year to confirm whether P283 is maintaining the improvements witnessed in 2017/18.</p>	<p>The change to the TAM audit scope to report on ‘pre’ and ‘post’ P283 Metering Systems was one of four² changes introduced at the beginning of the 2018/19 audit year.</p> <p>In order to ensure all Market Participants are aware of what is expected of them with regards to the TAM audit, ELEXON held an education day in February 2018. In addition, ELEXON and the TAA will provide support to all Parties including Licenced Distribution System Operators (LDSOs) throughout the audit year to ensure that obligations are being complied with.</p> <p>ELEXON will work with the TAA to monitor the results of the 2018/19 audit year with regards to Commissioning, and highlight any causes for concern to the PAB in the Technique Progress Report (TPR).</p>
2.	<p>From observations made in the 2017/18 specific sample, the TAA raised a concern that Suppliers do not know who owns (and who is therefore responsible for Commissioning) Current Transformers (CTs) and Voltage Transformers (VTs).</p> <p>The TAA recommends that ELEXON issues guidance or training to assist Suppliers in understanding the importance of Commissioning in accordance with CoP4.</p>	<p>ELEXON held a Commissioning education day for Market Participants on 07 June 2018. The education day was attended by 43 industry members and aimed to assist Market Participants with their understanding of CoP4 requirements and their obligations under P283. The education day was focused on the three changes being introduced to facilitate the more effective and efficient running of the Commissioning process: CP1495³ CP1496⁴ CP1497⁵.</p> <p>ELEXON will continue to assist Parties with the P283 process during the 2018/19 audit year and will offer further support to Parties when the Commissioning data flows are implemented in November.</p>

¹ Reinforcing the Commissioning process

² Auditing all circuits per CVA MSID, auditing Offshore windfarms, allocating non-compliances to LDSOs and recording instances where there is insufficient load to complete Commissioning

³ Introduction of a rejection response data flow for a D0170 ‘Request for Meter System Related Details’ request from the Meter Operator Agent to the Licenced Distribution System Operator where a D0215 ‘Provision of Site Technical Details’ response is required.

⁴ Introduction of two data flows for the Commissioning process for Half Hourly (HH) Supplier Volume Allocation (SVA) Current Transformer (CT) operated Metering Systems

⁵ Introduction of data flows for Half Hourly Meter Operator Agents to pass on Commissioning information when there is a Change of Agent

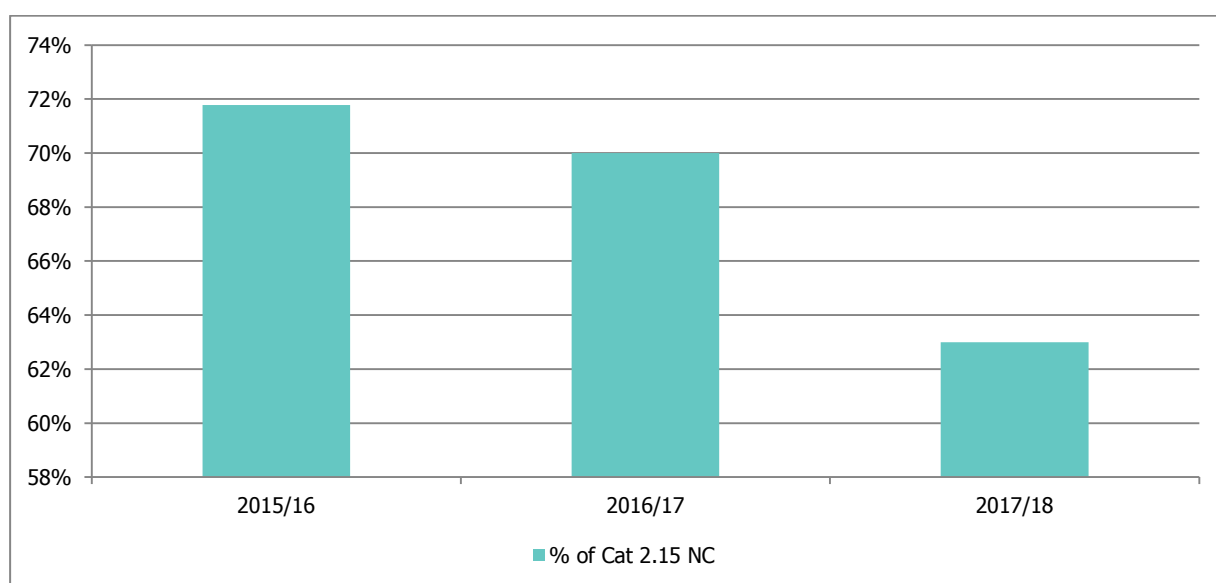
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3.	<p>P283 does not address historic Commissioning non-compliances.</p> <p>Following the 2017/18 audit report, the TAA recommended that ELEXON consider a cleansing of historic Commissioning non-compliances.</p> <p>Should ELEXON (with the approval of the PAB) decide to cleanse historic Commissioning non-compliances the TAA recommends undertaking a Specific Sample for those Metering Systems where a non-compliance has been closed, to ascertain whether Commissioning has subsequently taken place.</p>	<p>ELEXON took an action from the May Technical Assurance of Metering Expert Group (TAMEG) meeting (TAMEG34) to investigate the possibility of closing Commissioning non-compliances which were raised prior to the implementation of P283.</p> <p>ELEXON will work with the TAA to understand the possible risks of closing the historic non-compliances prior to making a recommendation to the PAB at a future meeting. ELEXON will update the PAB on the progress of this action via the TPR.</p>
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Conclusions: ELEXON Recommendations on Commissioning and Commissioning Records

- 2.2 ELEXON notes the TAA's concerns with the Commissioning process, specifically regarding the lack of Commissioning evidence and that 63% of the SVA Metering Systems audited had no or incomplete Commissioning records. ELEXON notes that the majority of category 1 non-compliances⁶ identified in the SVA market also have a category 2.15⁷ non-compliance. This suggests that if thorough Commissioning procedures had been followed, the category 1 non-compliances could have been avoided.
- 2.3 ELEXON notes a steady improvement in the percentage of category 2.15 non-compliances identified which indicates that the changes introduced by P283 have been effective to an extent. The percentage of non-compliances identified was at 72% in 2015/16, 70% in 2016/17, and has dropped to 63% in 2017/18:



- 2.4 In addition to the three recommendations listed in the table above, ELEXON anticipates that the Commissioning data flows which will be introduced by CP1496 in November 2018 will further strengthen Commissioning processes.
- 2.5 ELEXON has proposed to The MRA Service Company (MRASCo) that two new data flows be introduced as part of the Metering System Commissioning process. The new data flows will allow LDSOs, Suppliers and MOAs to exchange information using the Data Transfer Network (DTN). The change has been proposed in CP1496 and will reflect those two new data flows in BSC Subsidiary Documents.
- 2.6 Additionally in support of these new data flows, ELEXON is in discussion with the TAA with a view to amending the Technical Assurance Agent Management Tool (TAAMT) to allow parties to upload the data flows. ELEXON is confident that this change will further reduce the percentage of Commissioning non-compliances in the SVA market.

⁶ Currently affecting the quality of data for Settlement purposes

⁷ Commissioning records not provided, incorrect or incomplete

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3. Issue 2 – Measurement Transformer Calibration Certificates

3.1 The TAA’s recommendation for Issue 2, along with ELEXON’s comments, is set out below:

TAA Recommendation	ELEXON Notes
The TAA noted the root causes of why historical certificates cannot be sourced, e.g. if they are no longer physically available it is impossible to regenerate them. However, for newly commissioned Metering Systems that will have certificates, the TAA is not convinced that robust processes are being employed to ensure adherence to the CoPs. This is applicable to all Market Participants audited in 2017/18.	ELEXON notes that each CoP requires that calibration certificates are made available to the TAA for review at a TAA inspection. This evidence is no longer readily available to the TAA auditor due to the age of many HH Metering System installations.
The TAA recommends a concerted effort by all industry participants to establish what is now deemed as satisfactory evidence in maintaining Metering System overall accuracy in order to reduce the number of new non-compliances being raised.	ELEXON predicts that non-compliances associated to measurement transformer calibration certificates will continue to increase. A change in the process for managing and maintaining measurement transformer calibration certificates is required to prevent further increases. This change is in progress through the Working Group mentioned below.
The TAA also recommends that the historic non-compliances are cleared in a way which is acceptable to ELEXON and the PAB.	

Conclusions: ELEXON Recommendation on Measurement Transformer Calibration Certificates

- 3.2 Over the 2017/18 audit year, ELEXON held a Working Group with the aim of finding alternatives solutions/processes that would provide the same level of assurance in the absence of manufacturer’s calibration certificates.
- 3.3 The Working Group came up with a list of assurance types which can be provided in the absence of certificates. ELEXON is in the process of conducting a review of BSC documentation with a view to removing the requirement for Parties to provide certificates to the TAA. ELEXON will also compile new instructions for the TAA Local Working Instruction (LWI).
- 3.4 Once ELEXON has concluded the documentation review and collation of new instructions, ELEXON will present the proposed process to the PAB for decision.

4. Additional Actions

LDSO Attendance at Inspection Visits:

- 4.1 The TAA notes that approximately 18% of Inspection Visits completed in 2017/18, the TAA auditor was unable to access the CT/VT rating plates due to a lack of LDSO attendance. This is an improvement on the 25% recorded in 2016/17.
- 4.2 ELEXON will undertake two pieces of work over the 2018/19 audit year to address the lack of LDSO attendance at site:
- Issue a Newscast to remind Registrants of their obligations in BSCP27; and

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- Include a note in pre-inspection emails sent to LDSOs to advise that they will need to attend the Inspection Visit if the site is HV or LV if the Metering Equipment is contained in a substation.

5. Recommendations

5.1 We invite you to:

- a) **NOTE** the two identified issues affecting the health of the market; and
- b) **AGREE** the ELEXON recommendation against each issue.

For more information, please contact:

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