

# PAB221/13 – D0215 ANALYSIS AND RFI RESPONSES SUMMARY

<b>MEETING NAME</b>	Performance Assurance Board
<b>Date of meeting</b>	27 June 2019
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<b>Purpose of paper</b>	For Information
<b>Classification</b>	Public
<b>Summary</b>	ELEXON presented updated analysis regarding D0215 (Site Technical Details) performance at the February 2019 PAB meeting ( <a href="#">PAB217</a> ). This paper presents the results of the RFI feedback and subsequent analysis as directed by the PAB.

## 1. Background

- 1.1 **September 2015** Technical Assurance of Metering Expert Group (TAMEG) meeting: ELEXON presented a paper on the D0170/D0215 process. ELEXON took an action to undertake further investigation and analysis. ELEXON's analysis identified that there was a 50% mismatch between the Current Transformer (CT) ratios provided in D0215s and those in the D0268s flows. ELEXON notes that it can be particularly challenging to determine validity of either the D0268 or the D0215 without undertaking a site visit.
- 1.2 **March 2016:** the BSC Auditor raised Issue 5177: Use and Accuracy of Information within the D0215, which resulted in ELEXON raising CP1495 resulting in a new data flow (D0382 'Rejection Response for Request to Licensed Distribution System Operator (LDSO) for Site Technical Details') being introduced to the Data Transfer Catalogue (DTC).
- 1.3 **November 2018:** The D0382 went live.
- 1.4 **February 2018** PAB Meeting: ELEXON presented a paper highlighting the prevalence of D0215 flows containing incorrect data across the industry. PAB requested that ELEXON undertake further investigation into the D0215 process.
- 1.5 **February 2019** PAB Meeting: The PAB directed ELEXON to issue a 'Request for Information' inviting views and comment regarding the D0215 process from Meter Operator Agents (MOA) and Licenced Distribution System Operators (LDSO). In addition the PAB directed ELEXON to undertake further DTN analysis to assess:
  - a) The frequency with which LDSO's respond to D0170 requests and whether the BSCP514 obligated timescales are adhered to; and
  - b) The use of the D0382 (rejection of a D0215 request) and the reason codes being provided.

### 2. Risk

- 2.1 Under ELEXON's [2019/20 Risk Evaluation Register \(RER\)](#), the risks relating to the transfer and processing of MTDs are Risk 008 and Risk 012 (detailed below).

Risk ID	Risk Category	Risk Sub-Category	Risk Title – The risk that...	Forecast Impact	Upper Impact
008	Data retrieval and processing	Processing of metered data	SVA metered data is not processed or transferred correctly, or at all	£7.4m	£22.6m
012	Metering	MTD Quality	SVA Metering System technical details are created incorrectly	£6.2m	£17.1m

- 2.2 Risk 008 is a 'focus risk' under the [2019/20 Risk Operating Plan](#).

### 3. Additional Analysis

- 3.1 The detailed analysis ELEXON has undertaken is provided within the Appendices. Summary analysis for each area is provided below.

#### D0170 Response Rates

- 3.2 ELEXON undertook this analysis to assess the frequency with which LDSOs respond to D0170 requests and whether the BSCP514 obligated timescales are adhered to. The analysis indicates that the introduction of the D0382 flow has significantly improved the frequency with which LDSOs respond to D0170 requests for D0215 details and the proportion of those responses received within BSCP timescales.
- 3.3 ELEXON found the average D0170 response rate pre-February 2019 to be 67.77% while the average response rate post-February 2019 was 89.57% (an improvement of 22%).
- 3.4 ELEXON also measured response rates broken down by LDSO over time which is provided within the confidential attachment. This additional analysis has indicated that, bar a few exceptions, improved performance has been seen across the board.

#### D382 Rejection Reason Analysis

- 3.5 ELEXON undertook DTN analysis of the D0382 flow to determine the most prevalent reasons why D0170 requests for D0215 details are being rejected by LDSOs. It appears that between ~85% and ~99% of D0382 flows sent by a given LDSO were sent with the same reason code. Dependant on the LDSO this was either reason code 03 or 01.
- 3.6 The analysis indicates that the vast majority of D0382 rejection flows are flagged with reason code 01 (Measurement Transformers installed pre 6 November 2008 (BSC CP1225)). ELEXON has undertaken analysis of the 'Effective from Registration Date' for these Metering Systems within Supplier Meter Registration Service (SMRS) data and has identified that in 89.61% of cases (47,599 out of 53,117 D0382 flows sent within period) the Effective from Registration Date held for the Metering System was after 6 November 2008 (the date [CP1225](#) was implemented). In fact, 56.12% (29,808) of the Metering Systems for which a D0382 had been issued with rejection reason code 01 were found to have an Effective from Registration date in 2019. This indicates that in the vast majority of cases this rejection reason code is being used incorrectly.
- 3.7 Reason code 03 (Measurement Transformers not LDSO owned and not yet adopted into LDSO ownership) is the only other reason code being used in materially significant volumes at 6.30%. ELEXON has undertaken analysis of the 'energisation status' and 'energisation date' for the Metering Systems flagged with this rejection reason and has validated that these instances may be valid. Only 1.02% (37 out of 3631) of D0382s

sent within period were sent after the energisation of the Metering System (after the date by when the LDSO should have adopted the site).

3.8 This analysis covers all D0382 flows sent between 1 February 2019 and 1 May 2019.

### 4. Request for Information – MOA and LDSO Responses

4.1 ELEXON will continue to review the RFI responses in the context of the discussion at the June PAB meeting. Further internal discussions will need to take place in the context of engagement with the Master Registration Agreement (MRA) code administrator.

### Summary of MOA Responses

4.2 Six MOAs responded to the RFI. Feedback was mixed but a general trend in feedback indicated a lack of confidence in the accuracy of details provided within the D0215 flow and frustration with the process. It is seen more as an exercise in compliance rather than a useful mechanism for procuring Meter details and mitigating risk.

4.3 A summary of MOA responses is provided below. A more detailed breakdown of RFI responses will be provided along with our recommended solution at a future PAB meeting.

- i) How do you feel about the general accuracy of D0215 details across the industry?
  - Mostly incorrect
  - Poor and cannot be trusted
  - Below expectations
- ii) What are the most common issues you encounter with the D0215 process?
  - Incorrect Current Transformer/Voltage Transformer (CT/VT) ratios
  - No responses
  - Non provision of CT/VT ratios
- iii) Does your organisation rely on the details within the D0215 dataflow?
  - Processes are built without D0215
  - No interest in D0215
  - D0215s are not used
  - D0170 is sent for BSCP compliance, no D0215 data is needed
- iv) How do you validate the accuracy of details within received D0215 flows? Are there data sources other than the D0215 data flow that you rely on to confirm Current/Voltage Transformer ratios?
  - No validation, data is not used
  - MOAs noted the hierarchy of sources trusted to confirm CT/VT ratios and D0215 details were as follows: Site visits > MOA (part2) Commissioning results > Single line diagram > CT/VT calibration tests > D0268 > D0383 > D0142 > D0215

- v) How frequently are your requests for D0215 details fulfilled?
- 91.4% (17% mismatch) / 92% / 60%
  - In general, there are no problems with the response rate but the quality of the data is poor
- vi) Do you engage with LDSOs in respect of missing or inaccurate D0215 flows/details? If yes how effective have you found this engagement to be? Specific examples of issues or successful practices would be particularly helpful.
- Only in rare exceptions
  - Possibly if LDSO is known
  - LDSOs are not the most approachable party
  - A repeat request with CT/VT differences is sent as per CoP 4. (usually no answers received)
- vii) What are the most significant impacts of missing or inaccurate D0215 flows on your operational activities? Specific examples/estimates would also be helpful in this instance.
- No impact as the D0215 is not used
  - Incorrect metering configuration, repeat site visits, billing issues
- viii) Are there any technical changes or solutions you can think of, which you believe may serve to mitigate these challenges.
- Replace it with D0383
  - D0215 has no value. Introduce a new optional flow
  - Make CT/CT fields mandatory
  - Improve LDSO engagement

### Summary of LDSO Responses

- 4.4 Seven LDSOs responded to our RFI. Feedback was mixed but a general trend in feedback indicated that LDSOs shared MOAs' concerns over the usefulness of the D0215 process. Even where LDSO's had automated processes in place for responding to D0170 requests for D0215 details they shared concerns over the accuracy of the flow. The majority of LDSOs reported that the introduction of the D0382 flow had been useful.
- 4.5 A Summary of LDSO responses is provided below. A more detailed breakdown of RFI responses will be provided along with our recommended solution at a future PAB meeting.
- i) How do you feel about the general accuracy of D0215 details across the industry?
- If the recorded metering information in our database are incorrect, the accuracy would be low
  - The baseline of records are correct
  - If a query is received it is mainly for CT accuracy
  - D0215 accuracy is sometimes questionable

- Mandatory information is generally accurate
- ii) What are the most common issues you encounter with the D0215 process?
- High volume of requests / Duplicate requests / repeated requests
  - Requests often received for invalid / unmetered / disconnected MPANs
  - No information for 'single phase metering configuration'
- iii) Has the rejection flow (D0382) proved useful in managing the D0215 process?
- The majority of respondents indicated it has proved useful because:
    - Allows to respond to request in every occasion
    - Filters requests for information on MPANs
    - Communicates additional, accurate information
  - A minority responded that it has not proved useful because:
    - We already communicate all the information within D0215
- iv) What are the most significant challenges you face in respect of issuing D0215 flows?
- Very high volume of requests
  - MOA is often not appointed for the MPAN
  - No issues as the as there is an automated flow set up for D0215
- v) What controls does your organisation have in place to ensure that you respond to D0170 requests within BSC timescales?
- Systems in place to automate respond to the flow
  - Daily monitoring process
  - Monthly repost that checks the date different between D0170 & D0215
  - KPI reports linked to SLA's
- vi) What controls does you organisation have in place to ensure the accuracy of the D0215 details you provide?
- Due to high volume of request we are unable to validate data / there are no checks in place
  - Access to legacy databases
  - Cross-referencing with other flows (D0383)
  - Commissioning obligations check

vii) Do you receive large volumes of chases or escalations from Meter Operator Agents chasing missing or inaccurate D0215 flows/details? How do you manage such contact?

- We receive duplicate and bulk requests (very few chasing or inaccurate flow requests)
- Occasionally some queries for CT ratio accuracy
- Small number of such contacts (28 queries over a year)
- Significant amount (194 over a 6 months period)

### 5. Next Steps

- 5.1 The feedback received through our RFI and the analysis undertaken has further validated that action needs to be taken to address a variety of frustrations with the D0215 process.
- 5.2 Some of the solutions suggested through the RFI (such as removing the D0215 or replacing it with optional use of the D0383 flow) and being considered by ELEXON, would require engagement with the MRA code administrator. ELEXON will continue to review and discuss these RFI responses and the findings of this analysis internally with Risk Owners and the Risk Evaluation Workgroup in order to better understand the risks associated with these issues and any potential solutions considered.
- 5.3 ELEXON will then work to engage with the MRA in order to develop an appropriate and practical solution which takes consideration of the various impacts and associated risks. A proposed solution will then be presented to the PAB (aiming for the August meeting, subject to progress made with the MRA) along with a more detailed breakdown of RFI responses, internal and MRA feedback and a more detailed assessment of the associated risks.

### 6. Recommendations

The PAB is invited to:

- a) **NOTE** the findings of the additional analysis and RFI presented within this paper; and
- b) **COMMENT** on the next steps highlighted within this paper.

### Appendices

Appendix 1 – D0170 Response Rates Analysis

Appendix 2 – D382 Rejection Reason Analysis

### Attachments

Attachment A – Confidential Analysis

#### For more information, please contact:

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## APPENDICIES

### Appendix 1 - D0170 Response Rates

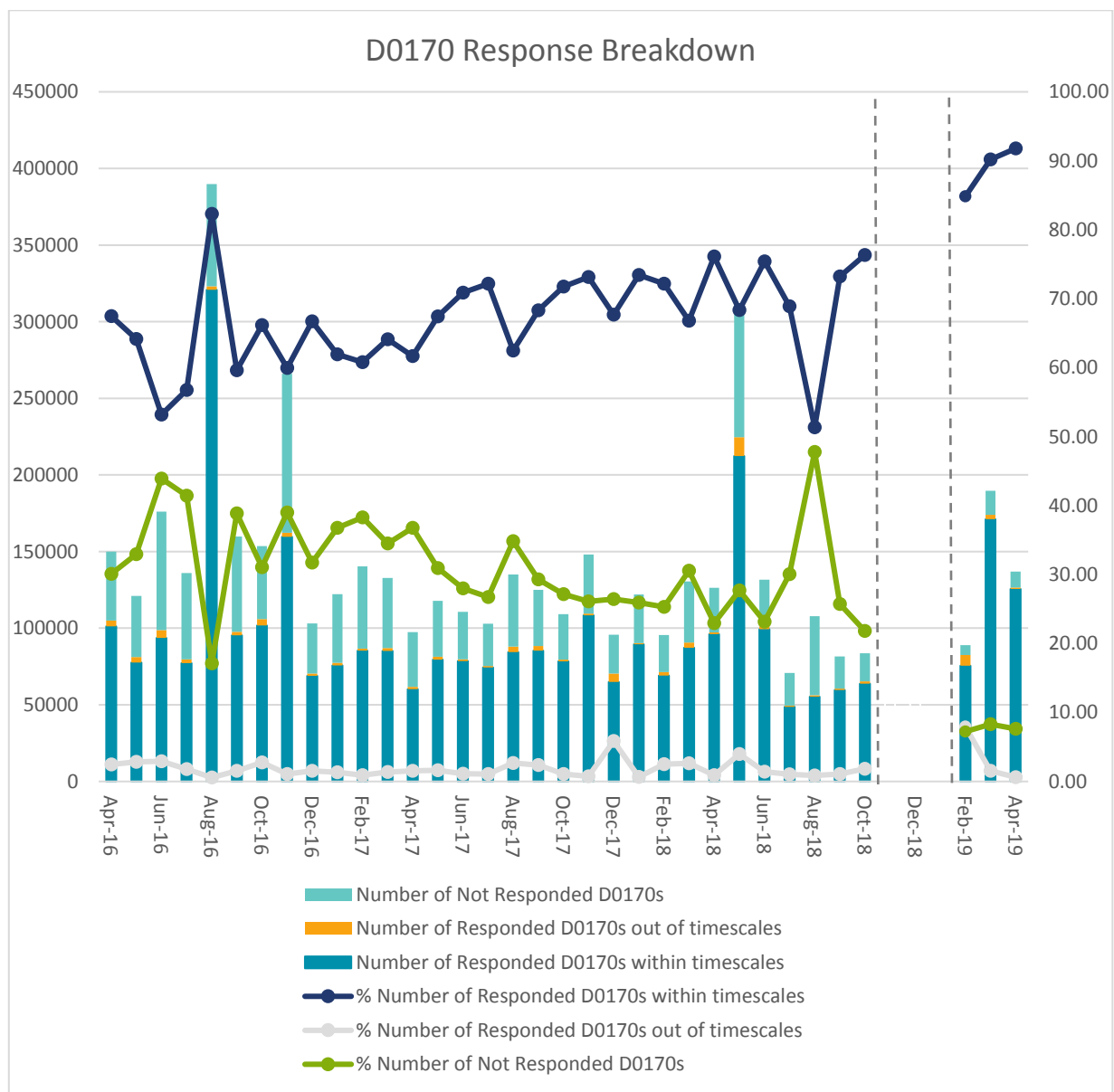
#### What question did we set out to answer?

- 6.1 We wanted to measure response rates for D0170 requests for D0215 details. Our data is incomplete between November 2018 and February 2019 as the D0382 rejection flow was introduced in November 2018 yet we only hold data for this flow from March 2019.

#### DTN test script logic:

- 6.2 We tracked LDSO responses to D0170s over time in order to measure the frequency with which D0170s were responded to within timescales and whether a D0215 or D0382 was sent in response.

#### Findings and breakdowns:



### Appendix 2 - D382 Rejection Reason Analysis

#### What question did we set out to answer?

- 6.3 We wanted to identify the volumes in which each of the potential rejection reason codes were being used and to see how different LDSOs were using the flow.

#### DTN test script logic:

- 6.4 We aggregated the D0382 flows sent between 1 February 2019 and 1 May 2019 by rejection reason code and the sending LDSO MPID. We also captured the date each D0382 was sent.

#### Findings and breakdowns:

