

CP Assessment Report

CP1526 'Improving the communication methods in the fault rectification process'

ELEXON



Committee

Supplier Volume Allocation Group, Performance Assurance Board

Recommendation

Approve

Implementation Date

24 June 2021 (June 2021 Release)



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1526 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 3 March 2020 and the Performance Assurance Board (PAB) at its meeting on 26 March 2020. The Committees will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1526.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1526 solution.
- Attachment B contains the full responses received to the CP Consultation.

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1 Why Change?

What is the issue?

The Half Hourly fault rectification process outlines timescales for providing updates at 5WD and 15WD after the fault is raised with the Meter Operator Agent (MOA). After this, it is unclear how and when updates should be provided.

In addition to this [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) provides Service levels for 100% of faults raised to be resolved within 15WD. In practice this is not realistic for all faults, as some may require complex site visits, and audit reports found instances where a [D0002 'Fault Resolution Report or Request for Decision on Further Action'](#) was sent in order to meet BSC timescales without the fault being fully resolved.

These unrealistic timescales hamper the efficiency of the fault rectification process, as a new fault may need to be raised where it is incorrectly closed. The [Issue 73 'Review of fault management and resolution timescales'](#) Group considered service level agreements as part of its discussions and proposed changes. This CP seeks to implement those changes into the BSC.

Background

What is the fault rectification process?

The fault rectification process is used where a fault is identified with Metering Equipment that prevents accurate metered data being entered into Settlement. Faults are usually identified by the Half Hourly Data Collector or Supplier, who raise the fault with the MOA to investigate and resolve.

As the Party Agent assigned to a Metering System, the MOA has overall responsibility for maintaining the Metering Equipment. However, in some instances, it may require support or additional information from the Supplier or LDSO, particularly where faults occur on Metering Equipment owned by the LDSO.

Ensuring that identified faults are resolved efficiently and in a timely manner is essential to making sure that Suppliers can achieve their Meter read targets so that only accurate metered data is used in the Settlement Calculations.

Issue 73

[Issue 73 'Review of fault management and resolution timescales'](#) was raised by SSE on 12 October 2018. The Issue Group was established to review the recommendations of the Fault Investigation Review Group, and determine whether any amendments should be made to the proposed solutions to ensure that changes were still reflective of best practice. The Issue Group also considered when the LDSO should take responsibility for resolving faults to ensure the process was clear for all involved. The Issue Group recommended three CPs (including this CP1526) to progress changes to the Half Hourly fault rectification process. This CP seeks to implement changes to the involvement of LDSOs in the fault rectification process. The two other CPs are:

- [CP1524 'Improving the communication methods in the fault rectification process';](#) and
- [CP1525 'Improving the involvement of the LDSO in the fault resolution process'](#)



Fault Investigation Review Group

The Fault Investigation Review Group met throughout 2015 to review the fault rectification process and propose changes. Due to the large-scale changes to Commissioning, that used much of the same resource, the proposals were not immediately progressed.

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Proposed solution

Rectification process

CP1526 seeks to introduce new service levels for MOAs and LDSOs to adhere to when investigating and rectifying faults on Metering Equipment.

[CP1524 'Improving the communication methods in the fault rectification process'](#) and [CP1525 'Improving the involvement of the LDSO in the fault resolution process'](#) clarify and enhance the process by which MOAs and LDSOs both rectify faults on Metering Equipment and keep the Supplier and/or Data Collector informed of progress. The processes prescribe a circular method by which updates are provided until the fault is resolved. In order to ensure that faults continue to be resolved in a timely manner, this CP1526 will introduce the following service levels:

- A MOA will complete required work within 25WD on 95% of faults and complete work on 99% of faults within 39WD; and
- Where LDSO involvement is needed to address the fault, the LDSO will complete required work within 40WD for 97% of faults.

This change will also make clear that, where a fault has been escalated to the LDSO for investigation, no time will elapse against the MOAs targets, and no non compliances will be raised by the BSC Auditor, while responsibility is with the LDSO.

The service levels prescribed by CP1526 relate to processes that will be introduced or improved by both CP1524 and CP1525. The interdependency this creates requires both CP1524 and CP1525 to be approved before CP1526 can be approved. The Issue Group believe that the enhanced communication processes in the solutions to CP1524 and CP1525 would add benefit to the fault rectification process independently. This CP1526 builds on the improvements to ensure that the fault rectification is fully effective.

Rationale for service levels

These service levels were discussed by the Issue 73 Group. As part of its discussions, it considered analysis into the average time taken to resolve different categories of faults. It considered that as the analysis was based on a limited sample, an overall average of 25WD was proposed for work undertaken by MOA. Similarly for LDSOs, the Issue Group considered that as it did not have conclusive evidence on which to base proposals, a pragmatic approach would be to reflect the timescales of 40WD prescribed for LDSO work in the [Distribution Connection and Use of System Agreement](#).

The Issue Group noted that while it did not have definitive evidence on which to base solutions, it did want to include prescribed service levels in the BSCPs. It therefore made these proposals with the caveat that industry may wish to review them in the future if new evidence to support a change is provided.

Issue Group members did not believe that it was practicable to resolve all faults in these timescales, and proposed that a pragmatic, rather than total compliance approach be taken. ELEXON believes that while service levels should be realistic and risk based, they should also be aspirational targets. As such ELEXON proposes that the percentage should be to 95% for MOAs, and additionally 99% completed within 39WD to align with the R1 Reconciliation Run; and 97% for LDSOs.



CP1524

CP1524 is one of the three CPs recommended by the Issue 73 Group. It seeks to improve the way updates are communicated in the fault rectification process to ensure that relevant parties are kept informed, allowing faults to be resolved in a more timely and efficient manner.

CP1525

CP1525 is one of the three CPs recommended by the Issue 73 Group. It seeks to better involve LDSOs in the fault rectification process where faults are identified on LDSO owned Metering Equipment.

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This pragmatic approach ensures that parties will strive to attain higher levels of service while not being unnecessarily punitive. Thus ensuring the integrity of Settlement.

Proposer's rationale

Faults that remain unresolved can potentially lead to an increased level of estimated (and potentially inaccurate) data entering Settlement. By revising the service levels prescribed in the BSC, this CP seeks to ensure that faults on Metering Equipment will be resolved in a timely manner to ensure that inaccurate data does not impact on the Settlement calculations. The proposed changes will ensure that the BSC is enabling efficient rectification of faults.

The changes proposed will address the issues raised by the BSC Auditor from 2010-12, address points raised during the check in 2013 audit check, and implement the recommendations of the Issue 73 Workgroup.

Proposed redlining

CP1526 will require amendments to:

- [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#);
- [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#);
- [BSCP515 'Licensed Distribution'](#); and
- [BSCP533 Appendix B 'PARMS Calculation Guidelines'](#).

Redlined changes to these documents can be found in Attachment A.

3 Impacts and Costs

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'• BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'• BSCP515 'Licensed Distribution• BSCP533 Appendix B 'PARMS Calculation Guidelines'	<ul style="list-style-type: none">• None

Impact on BSC Settlement Risks

CP1526 will impact on Settlement Risk 005 'A fault with SVA Metering Equipment is not resolved, such that metered data is recorded incorrectly or cannot be retrieved'.

The Proposed changes will improve the efficiency and effectiveness of the fault rectification process, which in turn will help mitigate this risk.

Central costs

The central implementation costs for CP1526 will be approximately £2880 to implement the necessary document changes and update the relevant guidance documents.

BSC Party & Party Agent impacts and costs

CP1526 will impact parties involved in the Half Hourly fault resolution process by implementing a new services levels for parties involved in the Half Hourly fault rectification process to adhere to.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	CP1526 will amend the way parties provide updates on the rectification of faults with Metering Equipment.
Half Hourly MOAs	
LDSOs	
Half Hourly Data Collectors	

Participant costs

14 respondents identified organisational impacts that would result from CP1526. These impacts largely related to implementing changes to working practices and systems to support the proposed changes. Some respondents commented that the required changes would be relatively minor to ensure their training processes were up to date; others

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commented that they would require significant system changes to process the new data flows.

Some respondents noted positive impacts that included the increased visibility of faults data they would receive following the change.

Of the respondents that identified impacts arising from CP1526, 10 noted they would incur costs to implement the solution. These costs ranged from being described as medium to significant. Of those who provided approximate figures, these were in the region of £80,000-£100,000. The majority of respondents that identified costs, specified that these would be one off costs. Most respondents that identified costs commented that stated figures combined the costs of implementing CP1524, CP1525 and CP1526. CP1526 specific costs resulted from LDSOs needing to implement processes to ensure they could meet the required timescales.

Recommended Implementation Date

The recommended Implementation Date for CP1526 is **24 June 2021** as part of the June 2021 BSC Release. This Implementation Date will allow sufficient time for the associated Data transfer Catalogue CP and new data flows to be fully developed and implemented, and align with the implementation of CP1524 and CP1525.

The majority of consultation respondents agreed with the proposed implementation approach for CP1524, agreeing that the lead time was sufficient for industry participants to prepare their processes and systems for the change. More detail on respondents views on implementation can be found in Section **Error! Reference source not found..**

SVG's initial views

The SVG considered CP1526 at its meeting on 7 January 2020 ([SVG227/05](#)).

The SVG commented that it believed the title of CP1526 was misleading as the change proposed to review existing fault rectification service levels rather than introduce brand new requirements.

Some SVG members were cautious of the proposal to base the Service Level Agreements on percentages, believing that this would allow some faults to potentially remain open indefinitely. The SVG recommended adding a consultation question to ask whether industry members agreed with the CP1526 proposed approach and whether it could pose an operational risk. ELEXON notes that despite the existing Service Level being for 100% completion within 15 Working Days, many faults are not successfully resolved within this time, and the BSC does not provide guidance on how these should be treated. The Issue 73 Group believed that by making the Service Levels more practicable, they will provide greater value to parties involved in resolving faults, by enabling them to better prioritise and allocate available resource to resolving faults for which the lack of actual data affected Settlement calculations.

The majority of respondents agreed that a percentage based approach was appropriate for service levels relating to the rectification of faults. More detail on respondents' views and rationale can be found in Section 6 **Error! Reference source not found..**

6 Industry Views

We received 16 responses to the CP Consultation, which are summarised below. You can find the full responses in Attachment B.

Summary of CP1526 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1526 proposed solution?	10	6	0	0
Do you agree with the proposal to take a percentage based approach to compliance?	13	2	0	1
Do you agree that the draft redlining delivers the intent of CP1526?	11	1	3	1
Will CP1526 impact your organisation?	14	1	1	0
Will your organisation incur any costs in implementing CP1526?	10	3	2	1
Do you agree with the proposed implementation approach for CP1526?	12	4	0	0
Do you have any further comments on CP1526?	5	11	0	0

Solution

10 respondents to the consultation agreed with the CP1526 solution. Respondents believed that the proposals were more achievable and were likely to encourage participants to act within the spirit of the fault rectification process. Some respondents believed the proposed service levels should be tighter to provide greater oversight for Suppliers to manage their agent's performance.

Two respondents disagreed with the proposals noting that the percentage target for the LDSO service level would be greater than the equivalent provided in the Distribution Connection Use of System Agreement, if approved. Some respondents believed that the percentage based approach could lead to some faults being left open indefinitely. They believed that the proposals were effectively 'diluting obligations' and may lead to a decrease in performance standards, and risk the quality of data used in Settlement. ELEXON would expect Suppliers to work with their agents to ensure that open faults are appropriately prioritised so that accurate Metered data can be used in the Settlement calculations.

Percentage based approach

13 respondents agreed that it was appropriate to take a percentage based approach to service levels for rectifying faults on Metering Equipment. They commented that the existing target of resolving 100% of faults within 15WD was not realistic or achievable, and that the proposed approach allowed room for the exceptional cases, which may take longer than other faults.

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Some respondents noted that the proposed timescales have been based on limited data and commented that they should be reviewed after an appropriate time to ensure they are encouraging the timely rectification of faults on Metering Equipment.

One respondent agreed that a percentage based approach was appropriate, but commented that this should be based on energy volume rather than Metering System count to ensure the integrity of Settlement.

Two respondents did not believe that a target of less than 100% would support the timely rectification of all faults on Metering Equipment.

Implementation

12 respondents agreed with the proposed implementation approach for CP1526, agreeing that the lead time was sufficient for industry participants to prepare their processes and systems for the change. Other respondents who disagreed with the implementation approach gave varying reasons for their opinion. These included alignment with the Faster Switching Programme, which aims to be implemented in November 2021.

Other comments

One respondent commented on the separation of the performance standard from the Performance Assurance Reporting and Monitoring System (PARMS) serial HM14. During the consultation period, ELEXON identified that [BSCP533 Appendix B 'PARMS Calculation Guidelines'](#) makes reference to the existing requirement for a Half Hourly MOA to resolve all faults on Metering Equipment within 15WD. As such we have removed this reference from BSCP533 to align with the CP1526 solution.

The CP1526 solution did not seek to revise the PARMS serials reporting against faults on Metering Equipment as ELEXON's Performance Assurance Framework Review will take a holistic assessment of the continued suitability of PARMS and may propose fundamental changes. As such, any changes made under this CP1526 would not justify the cost of changes to the PARMS systems, as the PARMS changes may be superseded by the PAF Review recommendations. Any consequential changes that are required to PARMS will be considered under the review work stream to enhance efficiency.

Comments on the proposed redlining

11 respondents agreed that the proposed redlining would deliver the CP1526 solution. Respondents provided the below comments on the redlining

Comments on the CP1526 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP502 10.2	This reference does follow numerically with the previous sections.	We have amended the section to 4.13 as follows in sequence.
BSCP514 10.1.A	No specification given as to whether the DAXYX flow timeline is paused for MOA while open with LDSO – if no pause, MOA will	We believe that the footnote we have added to this section makes clear that where a MOA has escalated the fault to the LDSO no

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Comments on the CP1526 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	always fail compliance regulations based on LDSO timeframes already being larger than the max MOA timeframe. Please specify in redlining a pause in the time count for MOA from the moment DAXYZ flow is sent from MOA to Supplier referring an LDSO fault, up to the point that MOA received the DAXYZ flow from supplier referring LDSO fault resolution complete to then un-pause the time count.	time shall elapse against its Service Levels until the LDSO has completed all the required work.

Since the consultation, we have also amended BSCP533 Appendix B to remove references to the Fault Rectification process from HM14. This removed a reference which would have created a confliction with the CP1526 solution.

7 Recommendations

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP502, BSCP514 and BSCP533 for CP1526 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP502, BSCP514, BSCP515 and BSCP533 for CP1526;
- **APPROVE** CP1526 for implementation on 24 June 2021 as part of the June 2021 Release; and
- **NOTE** that CP1526 will also be presented for decision to the
 - PAB on 26 March 2020.

We invite the **PAB** to:

- **AGREE** the amendments to the proposed redlining for BSCP533 for CP1526 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP533 for CP1526;
- **APPROVE** CP1526 for implementation on 24 June 2021 as part of the June 2021 Release; and
- **NOTE** that CP1526 will also be presented for decision to the
 - SVG on 3 March 2020.

Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
PAB	Performance Assurance Board (<i>Panel Committee</i>)
PARMS	Performance Assurance Reporting Monitoring System
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)

DTC data flows and data items

[Data Transfer Catalogue data flows](#) and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0002	Fault Resolution Report or Request for Decision on Further Action
D[XYZ]	Fault Rectification Communication (<i>New flow</i>)

External links

A summary of all hyperlinks used in this document are listed in the table below.

External Links		
Page(s)	Description	URL
2,	Issue 73 on the BSCCo Website	https://www.elexon.co.uk/smg-issue/issue-73/
3	P383 on BSCCo Website	https://www.elexon.co.uk/mod-proposal/p283/
2, 3	CP1524 on BSCCo Website	https://www.elexon.co.uk/change-proposal/cp1524/
2, 3	CP1525 on BSCCo Website	https://www.elexon.co.uk/change-proposal/cp1525/
2, 4, 10	BSCPs on the BSCCo Website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps

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Page(s)	Description	URL
3	Distribution Connection Use of System Agreement	https://www.dcuda.co.uk/dcuda-document/
7	SVG227	https://www.elexon.co.uk/meeting/svg227/