

HALF HOURLY (HH) AND NON HALF HOURLY (NHH) ESTIMATION DURING COVID-19: TECHNICAL ASSURANCE OF PERFORMANCE ASSURANCE PARTIES (TAPAP) SCOPE

Performance Assurance Board (PAB)

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Summary **This paper seeks approval from the Performance Assurance Board (PAB) for the scope of a Technical Assurance Check on Half Hourly (HH) and Non Half Hourly (NHH) Estimation during COVID-19.**

1. Technical Assurance of Performance Assurance Parties Scope

- 1.1 Each year, the Performance Assurance Board (PAB) deploys the Performance Assurance Framework (PAF) to manage Settlement Risks. To do this, the PAB identifies, evaluates and prioritises the risks that may occur within Settlement and the extent to which they apply to each Performance Assurance Party (PAP). The PAB applies Performance Assurance Techniques (PATs) to Performance Assurance Parties (PAPs) based on the risk they pose to Settlement. This is published in the [Risk Operating Plan \(ROP\)](#).
- 1.2 For the current BSC year, four risk areas have been identified by the PAB as being a focus of work under the PAF. The scope of this check relates to the risk area “[supporting] the recovery of the market following the COVID-19 pandemic”.
- 1.3 To support the industry and Performance Assurance processes during the COVID-19 restrictions, the PAB approved a number of derogations to normal BSC processes and obligations. The derogations reflected the ability of BSC Parties and their Agents to meet those obligations under the restrictions imposed throughout Great Britain.
- 1.4 In particular, these derogations allowed Suppliers to request that Data Collectors (DCs) make changes to the Estimated Annual Consumption (EAC) of a supply outside of the circumstances described in BSCP502¹ and BSCP504².
- 1.5 At its meeting on 24 June 2021, the Performance Assurance Board (PAB) made the decision to begin the three-month notice period required to end the derogations. On 1 July 2021, notice was given to industry that the derogations would end on 30 September 2021. Suppliers were advised that they should review all Half Hourly (HH) EACs to ensure that they were reflective of the current level of operations at the site and put in place Non Half Hourly (NHH) EACs that replace the adjusted derogation EACs.
- 1.6 By the end of the derogated period, Suppliers are required to submit to Elexon a list of all Metering System Identifiers (MSIDs) that have not returned to their pre-lockdown EAC.

¹ [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)

² [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)

2. Detail of the check

2.1 The TAPAP will be performed with two main objectives:

- For HH Supplies, to confirm that Suppliers have reviewed the current EAC of all such MSIDs entered into the process and have evidence that this appropriately reflects current consumption on site; and
- For NHH Supplies, to confirm that Suppliers have submitted revised EACs for MSIDs entered into the process and, where the current EAC is an estimation made under the provisions for exiting the derogations, the Supplier has evidence this appropriately reflects current consumption on site.

2.2 The objectives of the TAPAP do **not** include checks on BSC Obligations outside of those covered by the relevant derogations to the BSC. However, any data Elexon deem to be of concern in relation to areas not covered by the scope of the TAPAP will be passed to the appropriate Risk Owners (see paragraphs 2.20 to 2.22 , below).

2.3 The TAPAP will draw on data for HH and NHH estimation from two sources:

- The data submissions that have been provided by DCs throughout the time the derogations to the BSC have been in effect; and
- The data submissions that Suppliers will be required to provide following the ending of the derogations on 30 September 2021.

DC Data Submissions

2.4 Since June 2020, DCs have provided Elexon with regular submissions detailing the MSIDs for which they have been asked to make a change to estimated consumption under the derogation. The format of these submissions has been amended slightly over time, but includes at a minimum:

- The MSID;
- Supplier MPID, and kWh value;
- Effective From Date (EFD) of the current EAC; and
- For HH supplies, an indication of whether the supply is now Settling on Actual data.

Supplier Data Submissions

2.5 As noted above, Suppliers are required to submit to Elexon by 1 October 2021 a list of all MSIDs that have not returned to their pre-lockdown EAC. This should include the MSID number, pre-lockdown and current EACs, and the rationale for either continuing the derogated EAC or calculating a new EAC.

Request for Information (RFI)

2.6 A Request for Information (RFI) formalising the requirement to submit the above information will be sent to any Suppliers that have not provided a submission by 4 October 2021.

What will the audit cover?

2.7 Elexon intends to select 10 MPIDs for inclusion in the TAPAP.

2.8 Candidates for the check will be selected based on HH and NHH data obtained through the sources described above.

2.9 Due to the unprecedented nature of the circumstances surrounding the check, candidates will be selected using a range of criteria to provide as broad a coverage of potential risk as possible. The different criteria for candidate selection are divided into two main groups.

2.10 The first group focuses on the aggregate risk to Settlement should a large number of changes to estimated consumption be made incorrectly:

- For each of the HH Measurement Classes (MC) C, E, and G and NHH Profile Classes 1-2 and 3-4, the MPID or MPIDs with the highest total kWh value of current EACs for MSIDs that have had consumption estimated under the process; and
- For each of HH MCs C, E and G and NHH Profile Classes 1-2 and 3-4, the MPID or MPIDs with the highest overall number of MSIDs that have had consumption estimated under the process.

2.11 The second group focuses on NHH Suppliers where the data shows changes in the volume and granularity of estimated data such as may indicate a misapplication of the process:

- For each of Profile Classes 1-2 and 3-4, the MPID or MPIDs with the highest kWh difference between the median pre-lockdown and current EACs of MSIDs that have had consumption estimated under the process;

- For each of Profile Classes 1-2 and 3-4, the MPID or MPIDs with the highest percentage difference between the median pre-lockdown and current EACs of MSIDs that have had consumption estimated under the process; and
 - For each of Profile Classes 1-2 and 3-4, the MPID or MPIDs showing the largest total percentage reduction in unique values between the pre-lockdown and current EACs of MSIDs that have had consumption estimated under the process
- 2.12 In addition to the above criteria, failure by a Party to provide a list of all MSIDs that have not returned to their pre-lockdown EAC by 4 October may be considered as additional grounds for inclusion in the TAPAP where thus suggests a lack of engagement with the process for ending the derogations.

How will the audit be conducted?

- 2.13 Elexon will conduct the TAPAP audit in accordance with BSCP535, Technical Assurance³.
- 2.14 Elexon will inform each candidate of the planned audit at least 10 Working Days (WDs) prior to the audit as per BSCP535.
- 2.15 Elexon will select a sample of no more than 15 HH and 15 NHH MSIDs per MPID, which will be taken from the data received through Supplier submissions at the close of the derogations and the DC Submissions received during the period the derogations to the BSC were in effect.
- 2.16 Both HH and NHH Samples will prioritise checking MSIDs with the greatest kWh difference between the pre-lockdown and current EAC, followed by the percentage change between pre-lockdown and current EAC if necessary.
- 2.17 For each MSID in the sample, Parties will be asked to provide the rationale for the EAC in place, the method by which it was calculated, and the underlying data used in this calculation. Further evidence in support of decisions made regarding particular MSIDs may be requested at Elexon's discretion following the audit check.
- 2.18 Elexon will conduct the audits by remote means such as teleconference or Microsoft Teams meeting, unless a Party specifically requests that they be carried out on site and in person. Any follow up will be conducted by teleconference or other remote means, as required.

When will the audits take place?

- 2.19 Elexon proposes that these audits are undertaken in Q4 2021, taking into account Elexon resourcing, impacts of the BSC Audit and any other TAPAP checks that have been planned for this Performance Assurance Operating Period (PAOP)..

Potential outcomes of the audit

- 2.20 Following the TAPAP audit, Elexon will review the information provided and seek a determination from the PAB as to whether any further action is required.
- 2.21 As noted above, any data Elexon deem to be of concern in relation to areas not covered by the scope of the TAPAP will be passed to the appropriate Risk Owners. Examples of such Risks could include, but are not limited to, SVA Risks R007 (Retrieval of Metered Data), R005 (Fault Resolution) and/or R008 (Processing of Metered Data).
- 2.22 Elexon will include details of the information passed to Risk Owners and any action they propose to take as a result in the TAPAP findings report.

3. Next Steps

- 3.1 If the PAB approves the scope of this TAPAP audit, Elexon will bring a Risk Management Determination (RMD) to the PAB detailing those Parties selected for inclusion as soon as possible, but no later than the October 2021 Meeting of the PAB.
- 3.2 The audit work will be undertaken in Q4 2021, and Elexon will present the TAPAP findings report at the January 2022 PAB meeting.

4. Recommendations

- 4.1 The PAB are invited to:

³ [BSCP535 'Technical Assurance'](#)

- a) **APPROVE** the scope for the TAPAP check on HH and NHH Estimation during COVID-19; and
- b) **PROVIDE** any additional comments for consideration when performing the check.

For more information, please contact:

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