

UPDATE ON THE IMPLEMENTATION OF THE RECOMMENDATIONS FROM THE REVIEW OF METERING DISPENSATIONS AND NON-STANDARD BM UNITS

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| Purpose of paper | Information |
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| Summary | This paper provides the Panel with an update on the actions that ELEXON has taken to implement the recommendations from the review of Metering Dispensations and non-standard BM Units. Since the Panel update in October 2018, we have closed two out of the outstanding four recommendations. |
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1. Background

- 1.1 During the second half of 2016 and the start of 2017, ELEXON conducted a review of Metering Dispensations and non-standard Balancing Mechanism (BM) Units. This was requested by the Panel and conducted as a Balancing and Settlement Code (BSC) Review in accordance with [BSC Section C 'BSCCo and its Subsidiaries'](#), paragraph 3.8.
- 1.2 At its meeting on 9 March 2017 ([Panel 264/08](#)), ELEXON presented a number of recommendations arising from the review. The Panel endorsed these recommendations.
- 1.3 At its meeting on 14 December 2017 ([Panel 273/06](#)), ELEXON presented an update on the actions that ELEXON had taken to implement the review of Metering Dispensations and non-standard BM Units. At that meeting, ELEXON reported that actions had been taken to resolve 11 out of the 15 recommendations. Further, updates were provided at the Panel Meetings on 12 April 2018 ([Panel 277/07](#)), 12 July 2018 ([Panel 280/10](#)) and 11 October 2018 ([Panel 283/06](#)).
- 1.4 This paper provides the Panel with an update on the progress made towards implementing the outstanding four recommendations.

2. Recommendation 3 – Metering low voltage supplies in substations (Closed):

- We recommend that ELEXON sets up a working group to propose solutions to the issue of metering low voltage (LV) supplies in Offshore wind farm substations (and onshore substations generally).
- 2.1 ELEXON has drafted a BSC Issue and this will be progressed by the Change Team. There is no dependency between this and other recommendations from the review. As a BSC Issue, the Panel will see the results through the Issue process and therefore we consider this recommendation completed.

3. Recommendation 7 – Review GSPs with difference metering (Partially completed):

- We recommend that all 'differencing arrangement' Grid Supply Points (GSPs) and related sites (Power Stations or Distribution Systems Connection Points (DSCPs)) are subject to a detailed review to determine:
 - the location of the Metering Systems involved and any material changes to the site(s) that affect the Metering Dispensation or differencing;

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- whether appropriate compensation is applied for electrical losses from the Actual Metering Point (AMP) to the Defined Metering Point (DMP) (where necessary or appropriate); and
 - whether any significant work is due to take place at that GSP such that Metering Equipment can be installed at the appropriate DMP(s) and the difference metering arrangement removed/modified so as to remove/reduce a potential ongoing risk to Settlement.
 - We will also promote awareness with the Licensed Distribution System Operators (LDSOs) (Registrants) and the Transmission System owners of the differencing arrangements in order to reduce the risks of detrimental effects by new connections on the differencing arrangements.
- 3.1 We initially identified 36 GSP sites with differencing arrangements. One GSP is no longer registered in Settlement; however the Registrant needs to withdraw the associated Metering Dispensation. Three GSPs now no longer have a differencing arrangement in place as the circuits differenced off the GSP metering have been de-registered in Settlement and the Metering Dispensations have been withdrawn.
- 3.2 We have sent a questionnaire form to the Registrants of circuits associated with the remaining 32 GSP sites asking for information about the GSP and requesting electrical single line diagrams. We gave Registrants 20 Working Days (WDs) to respond to this request with a cut-off date of 30 August 2018.
- 3.3 As of 12 December 2018, we received 61 out of the 66 diagrams required for the review. The remaining five diagrams are the responsibility of one Registrant. Despite help from the Panel's Distribution System Operator (DSO) Representative, David Lane, and repeated reassurances that these diagrams will be provided, we have not received them.
- 3.4 Aggregation Rules and Meter Technical Details (MTDs) for all the sites have been provided by the Central Data Collection Agent (CDCA).
- 3.5 We have reviewed 25 GSP sites (up from 16 since the October 2018 update) and their associated Aggregation Rules and MTDs. We have found no material issues. We have found that one Metering Dispensation is not in place for differencing for a GSP¹, 12 Metering Dispensations for GSPs need to be updated and seven withdrawn² to take into account circuits that have been added or removed. Five Metering Dispensations reviewed are still fully valid. Of the GSP sites that still require difference metering (18³), 16 have no significant work planned for the GSP sites that would allow for the difference metering arrangements to be removed. The Registrants for two GSP sites have yet to confirm if there is any significant work planned at these GSP sites (we will chase them for a response).
- 3.6 We will continue to review the diagrams we have (to do two GSP sites) and continue to chase the Registrant for the remaining five diagrams (to do the remaining five GSP sites).

4. Recommendation 8 – Perceived ambiguities with the BSC or CSDs (Closed):

- 4.1 ELEXON will work with the respondent [to the [consultation](#) issued as part of the review of Metering Dispensations and non-standard BM Units] to identify the perceived ambiguities. ELEXON will then determine what changes may be appropriate to guidance notes, the BSC or the Code Subsidiary Documents (CSDs) and

¹ The circuits differenced off the GSP are disconnected but the associated Metering System and BM Unit for these circuits have not been deregistered yet. Future connections could be made at these connections meaning differencing may be required at a later date.

² The circuits differenced off the GSPs have now been removed or in one case the GSP is no longer in Settlements.

³ Excludes the GSP that has no Metering Dispensation for differencing (that will soon no longer need differencing but may in the future if new connections are made).

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where it is able to make these changes (e.g. to guidance) or recommend changes for the Panel or relevant Committee(s) to progress.

- 4.2 The respondent confirmed the ambiguities related to the Technical Assurance Agent (TAA) Working Instructions and Code of Practice (CoP) 4⁴. ELEXON held a workgroup on 13 December 2018 with Suppliers, LDSOs and Meter Operator Agents (MOAs) to discuss the ambiguities and other suggestions for changes to CoP4. During the meeting the workgroup agreed an agenda of items for further discussion for the next meeting in January 2019.
- 4.3 The ambiguities raised do not affect Metering Dispensations. As we have set up a workgroup to discuss these ambiguities and take any appropriate action we consider this recommendation completed.

5. Recommendation 9 – Review Metering Dispensation records (Partially completed):

- ELEXON will review its records of Metering Dispensations with a view to:
 - completing and re-publishing records where there is missing information that is not confidential, e.g. Metering System Identifiers (MSIDs);
 - determining, with the support of Registrants, whether (elements or all of) previously confidential Metering Dispensations can now be made public; and
 - determining, with the support of Registrants and targeted site visits by the TAA where necessary, whether historical, lifetime Metering Dispensations are now redundant, e.g. because the BSC requirements have evolved or the configuration and provision of Metering Equipment at a site has over time been upgraded and now complies with the BSC.

5.1 There are two out of 220 approved Metering Dispensations where we do not have the MSIDs. These are complex sites and the Registrants of the sites have provided multiple MSIDs that the Metering Dispensations could relate to.

5.2 We have instructed the TAA to carry out a targeted Inspection Visit at these sites to determine if the Metering Dispensations are still valid and which MSIDs they relate to. We are waiting for the TAA to carry out these Inspection Visits.

5.3 There are 21 confidential Metering Dispensations. ELEXON has emailed the Registrants of these asking whether basic information relating to these Metering Dispensations can be made public. The deadline for providing a response was 22 March 2018.

5.4 As of 28 September 2018, the status of the responses were as follows:

 - Registrants of 13 confidential Metering Dispensations have agreed to basic information about the Metering Dispensations being made public; and
 - Registrants of six confidential Metering Dispensations wish all the information about their Metering Dispensations to remain confidential.

5.5 This work identified that two of the Metering Dispensations were no longer required. This concludes this aspect of Recommendation 9.

⁴ 'Code of Practice for the calibration, testing and commissioning requirements of Metering Equipment for Settlement purposes'

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- 5.6 The missing MSIDs and basic information for confidential Metering Dispensations that can be shared will be published once we have identified the two missing MSIDs and confirmed whether those Metering Dispensations are still required.
- 5.7 There are 220 approved Metering Dispensations requiring a site visit to review the Metering Equipment. It is planned that the TAA will conduct these reviews as sites come up in the TAA Audit Schedule. ELEXON has received an impact assessment from the TAA detailing the costs and timescales of updating their system to report on approved Metering Dispensations. We will work on a cost benefit analysis for presentation to and decision by the Performance Assurance Board (PAB).

6. Recommendations

- 6.1 We invite you to:
- a) **NOTE** the progress made towards the implementation of the recommendations from the review of Metering Dispensations and non-standard BM Units.

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