MDD CHANGE REQUESTS FOR VERSION 302/303

MEETING NAME BSC Panel

Date of meeting 10 September 2020

Paper number 306/05

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Purpose of paper Decision

Classification Public

Summary A paper regarding the approval of Line Loss Factor Classes (LLFCs) and Non

Half Hourly (NHH) and Half Hourly (HH) combinations of Market Domain Data (MDD) items as part of an upcoming MDD release was presented to the SVG at its September meeting. The SVG was unable to reach a unanimous verdict on the decision, and therefore the SVG Chair has referred the paper to the BSC

Panel for decision.

1. Background

- 1.1 Updates to Market Domain Data (MDD) are made through monthly releases. Elexon progresses MDD changes in accordance with BSC Procedure (BSCP) 509 'Changes to Market Domain Data'.
- 1.2 Licensed Distribution System Operators (LDSOs) have begun submitting MDD Change Requests (CRs) for new Line Loss Factor Classes (LLFCs) and Non Half Hourly (NHH) and Half Hourly (HH) combinations of MDD items to support the implementation of Ofgem's Targeted Charging Review (TCR) Significant Code Review (SCR). LDSOs require approximately 19,000 new LLFCs and 300,000 new valid set combinations. In order to manage the unprecedented volume of new LLFCs and valid sets, all TCR related MDD Change Requests will be submitted to the SVG for approval a month in advance of the normal MDD CR cycle, to facilitate the extra time required to process the large volume of TCR changes.
- 1.3 Furthermore, Elexon has worked with the LDSOs to agree a schedule for raising MDD CRs between August 2020 and March 2021. This is to spread the load out over time rather than to try and process all MDD CRs in one go.
- 1.4 Between May and June 2020, Elexon worked closely with the LDSOs to understand what changes to MDD would be required, which identified the scale of the challenge. Elexon and the SVG have since expressed concern around the large volumes of LLFCs and valid sets that will need to be approved to support the TCR Implementation Date of 1 April 2022. Distributors have asked for their TCR changes to be live in MDD by 1 April 2021 to give them time to update Metering Systems Registration Details in MPAS before the TCR Implementation Date.
- 1.5 This timescale is because the implementation of 'Faster Switching' arrangements in 2021, and Suppliers' requests for as much notice of how Metering Systems LLFCs will be changed, mean that LDSOs believe they are limited to making changes in MPAS between April 2021 and June 2021.
- 1.6 To understand the industry impact of these changes, Elexon published a Request For Information (RFI) on 10 August 2020. The collated responses are included as Attachments B and C to this paper.

1. Progression at SVG235

1.1 At the September SVG Meeting (SVG235), Elexon presented the first of the TCR-related MDD CRs, intended for implementation in Version 303 of MDD with a go-live date of 21 October 2020. This formed part of paper SVG235/01 (Paragraphs 4.2 and 4.3).



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- 1.2 The SVG agreed to approve Recommendations (a) and (b) from the paper; these relate to normal, business as usual MDD CRs.
- 1.3 There was significant debate amongst the SVG Members regarding Recommendation (c) as to the risks to Settlement posed by the large numbers of updates to MDD (both in this paper, and anticipated in future months to support the TCR).
- 1.4 The SVG, by a majority of five to one, had the opinion that these were significant risks to the integrity of Settlement and were minded to reject the changes. However, the same majority also noted that the TCR was a strategic initiative, supported by the Authority, and thus rejecting the changes would have significant implications on this. The risks identified by the RFI (from the 19 respondents) and the SVG in approving these CRs for the October 2021 MDD release were:
 - One respondent to the RFI expressed concern that they may not be able to load the larger MDD complete or partial set data files (D0269 and D0270) that would be created should all TCR-related MDD CRs be approved;
 - Four respondents noted that they may not be able to load the larger Line Loss Factor files (D0265) that
 would be created should all TCR-related MDD CRs be approved. The SVG noted this as a particular
 concern for them;
 - The amount of load that would be placed on the Data Transfer Network (DTN) due to the increased file sizes; and
 - That the data will be approved and published before participant testing is available or carried out. 16 respondents to the RFI requested that testing would be beneficial and SVG members believed this was a major concern to the accuracy of Settlement.
- 1.5 The same majority of SVG also voiced the opinion that, under the <u>SVG's Terms of Reference</u>, their vires are quite narrow (protecting the integrity of Settlement through the management of SVA processes and systems), and do not include the ability to consider wider Industry impacts such as the TCR. These members therefore felt that referring this decision to the BSC Panel was the right approach.
- 1.6 Therefore, the SVG were unable to reach a unanimous verdict on Recommendation (c), with one vote in favour and five votes against.
- 1.7 As set out in the SVG's Terms of Reference, in order to approve (or reject) a paper, the SVG must reach a unanimous decision. With the SVG unable to reach that position, the SVG Chair may choose to defer the paper to the following meeting, to allow further discussions to happen. The SVG Chair initially considered deferring the paper, but felt that, following the discussion at the meeting, the only way to break the impasse would be to refer this to the BSC Panel.
- 1.8 The members also asked for clarification on the SVG's Terms of Reference and vires regarding 'policy' level impacts on their decision-making.
- 1.9 Following the SVG meeting, Elexon attended a call with the TCR Implementation Steering Group to inform them of the SVG decision. The Distributors in attendance highlighted the concern and risk to the overall TCR plan caused by a 'domino effect' for the remaining Participant's submissions being delayed.

2. Recommendations

- 2.1 We invite you to:
 - a) **APPROVE** four General Change Requests for implementation in MDD 303 with a go-live date of 21 October 2020.

Attachments



V1.0

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Attachment A – SVG235/01 - MDD Change Requests for Version 302/303 SVG Paper

Attachment B – Consolidated RFI Responses – Public Version

Attachment C (Confidential) – Consolidated RFI Responses – Confidential Version

For more information, please contact:

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