

Issue Report

Issue 99 ‘Review the use of the D0215 flow and its associated processes’

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About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 10 mins? Read sections 1 and 4
- Have 25 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments
- You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)

This document is the Issue 99 Group’s Report to the BSC Panel. Elxon will table this report at the Panel’s meeting on 9 February 2023.

There are two parts to this document:

- This is the main document. It provides details of the Issue Group’s discussions and proposed solutions to the highlighted issue and contains details of the Workgroup’s membership.
- Attachment A contains the Issue Proposal Form.

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1. Summary

Issue 99 Purpose

Issue 99 'Review of the D0215 flow and its associated processes'¹ was raised by UK Power Networks (UKPN) on Wednesday 2 March 2022 to review the D0215 'Provision of Site Technical Details' data flow and its associated processes.

The main aim of this review was to identify the areas of the [D0215](#)² data flow and its associated processes that could be improved, and where possible in the relevant industry process, remove the D0215 flow. Issue 99 was progressed via a Cross Code Working process jointly with the Retail Energy Code (REC), who raised [R0017](#) to address a similar issue in the REC.

What is the Issue?

The D0215 data flow is utilised in certain industry processes, such as the Installation and Commissioning of new Supplier Volume Allocation (SVA) Metering Systems, Change of Measurement Class (COMC), and Change of Supplier (COS).

The Proposer of Issue 99 highlights that the D0215 flow is often requested prior to the Commissioning of the Metering System to seek the Metering Commissioning information. The Metering Commissioning information is therefore not typically included in the D0215 flow but is included in the D0383 'Notification of Commissioning Information' data flow following Commissioning, making the D0215 flow an unreliable source of Commissioning information.

This means that unnecessary time and effort is spent reviewing and processing the D0215 that may not end up offering value to the relevant parties.

However, the Proposer notes that some data items within the D0215 flow (such as Supply Capacity, Supply Voltage, etc.) that are not duplicated in the D0383 data flow may still be utilised, thus the Proposer believes there is a strong case for retaining the D0215 flow.

Conclusions

The Issue Group collaborated with Elexon and the Retail Energy Code (REC) through three Workgroup meetings to discuss and review the use of the D0215 data flow and its associated processes.

The outcome of this collaboration led the Issue Group to recommend changes are raised to the [Balancing and Settlement Code Procedure \(BSCP\) 515 'Licensed Distribution'](#)³ and the [REC Meter Operator \(MO\) Schedule 14 'Metering Operations'](#)⁴ to streamline the use of the D0215 flow in its associated processes. This includes:

¹ <https://www.elexon.co.uk/smg-issue/issue-99/>

² <https://www.electralink.co.uk/dtc-catalogue/>

³ <https://www.elexon.co.uk/csd/bscp515-licensed-distribution/>

⁴ <https://recportal.co.uk/en/the-rec-public>

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- Excluding the D0215 flow from the “New Supplier Volume Allocation (SVA) Metering process and Change of Measurement Class (COMC) process; and
- Retaining the D0215 flow for general investigative processes, with added guidance on requesting the D0215 information via the D0170 flow.

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2. Background

BSCP515 requires the Licensed Distribution System Operator (LDSO) to provide the Site Technical Details to the relevant Meter Operator Agent (MOA) using the D0215 data flow, when a new Metering System is installed. A MOA can also request the details at any time after its appointment, using a D0170 'Request for Metering System Related Details' data flow.

Evidence from the Technical Assurance Metering Expert Group (TAMEG) members suggests that MOAs do not currently use the information within the D0215 data flow. The TAMEG discussed the use of the D0215 flow at its meeting on [Thursday 20 January 2022 \(TAMEG 44/Minutes\)](#)⁵, highlighting the need to determine, via a Technical Assurance of Performance Assurance Parties (TAPAP) audit, if MOAs made use of the optional information in the D0215 data flow. At this meeting, some members noted that the D0383 data flow contains more accurate information than the D0215 flow, for evidencing the correct Metering System data at a site, during a new Meter Installation. In addition, some MOAs at the meeting stated that they have had to delete the D0215 dataflow because they did not see value in them. Further discussions across several members highlighted that there is some value in the D0215. However, reducing the high volume sent will enable parties to extract information from some optional fields.

Elexon completed the TAPAP audit following the meeting and presented its findings to the TAMEG [at its meeting on 14 April 2021](#)⁶.

The TAMEG members considered the findings from Elexon and agreed that a BSC Issue process was the most suitable way to arrive at a solution, and so, Issue 99 was raised to review the use of the D0215 data flow and its associated processes.

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⁵ <https://www.elexon.co.uk/meeting/tameg-44/>

⁶ https://www.elexon.co.uk/documents/groups/tameg/2021-meeting-tameg/tameg-45/tameg45-03-action-44-01-responses_v1-0_public/

Issue and Background

The Proposer explained that the Issue was first discussed at a TAMEG meeting in 2021, where evidence provided by some MOAs and LDSOs demonstrated that the D0215 data flow was not valuable to them in certain processes. The Proposer explained that because the D0215 is often requested prior to the Commissioning of a Metering Equipment process, the information within it is not the most accurate and complete. The D0215 flow should be of good quality, the Proposer added.

Elxon asked the Issue Group members to comment on whether this was a concern to address, based on the Proposer's rationale. Some MOA members pointed out that they send the D0170 data flow during the new Metering System Installations process (which triggers the receipt of the D0215 data flow) because the BSCPs mandate this. Although, they believe it should not be used in that process. Another MOA stated that they see value in the D0215 flow when they need to confirm the Low Voltage (LV) and High Voltage (HV) information from the Metering System. The majority of Workgroup members believed that the information in the D0215 flow would not be an accurate reference for programming new Meters therefore, believed there was merit to review the use of the D0215 in certain industry processes.

Elxon asked the group if the requirement in the BSCP, mandating the use of the D0170 on every Change of Agent (CoA) event should be reviewed. The Issue Group members agreed. A member from Retail Energy Code (REC) suggested that MOAs and Suppliers should be engaged to seek their views on the value and use of the D0215 data flow. Elxon and the Issue Group welcomed this view and agreed that a joint REC/BSC industry Request for Information (RFI) would be issued.

Solution Options

Elxon initially presented three options that were being considered as potential solutions for Issue 99, which were:

- **Option 1:** Remove the need for the D0215 flow, due to it being provisional information and mostly a duplicate of the D0383 flow. The potential benefit being that it reduces the risk of having an incorrectly programmed meter;
- **Option 2:** Review all of the processes associated with the request of the D0215 flow. The benefit being that it will limit the number of irrelevant D0170 requests, ensuring the D0215 flow is only requested where there is value in having it; and
- **Option 3:** Retain only the mandatory fields in the D0215 flow. The benefits being that it will ensure the relevant data is available to the MOAs and Suppliers. Further, it will encourage BSC Parties and Party Agents to utilise the D0215 data flow efficiently.

The Issue Group discussed all options. The majority disagreed with option 1 because they believed it might create unwanted costs for BSC Parties, associated with system changes. They were in favour of combining options 2 and 3, stating that there is value in retaining the D0215 data flow, and improving the D0215 data flow associated processes will provide the greatest benefit to industry.

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Further, the Issue Group suggested a new **Option 4**, which combines the solution of options 2 and 3 is progressed and should focus on the below areas:

- Reviewing the processes related to the D0215 flow;
- Understanding and determining the value of the optional fields in the D0215 flow;
- Clarifying when the D0170 request flow can be used, as opposed to it being used on every CoA; and
- Clarifying and potentially adding to the request reason codes in the D0170 flow.

Elexon acknowledged the feedback and suggested that this was included in the industry RFI to seek industry's view on the cost and impact for each suggested solution option (Options 1-4). The Issue Group agreed.

Industry's view on the value of the D0215 data flow

As agreed with the Issue Group, Elexon issued a joint industry RFI to understand the value of the D0215 data flow to their business processes. The RFI ran from Monday 13 June 2022 until Friday 1 July 2022 (15WDs) and was issued by both Elexon and the REC. 13 responses were received from Suppliers, MOAs and LDSOs. The majority of respondents were not in favour of removing the D0215 flow, suggesting that it is reviewed alongside its associated processes.

Question 1 – Awareness of the D0215 flow

We asked this question to confirm if Suppliers had visibility of the D0215 data flow, to which Suppliers confirmed that they receive the flow in their system. However, one of the Suppliers noted that the D0215 flow is not used in their operational processes. Although we asked this question to Suppliers, some MOAs confirmed that they receive the flow, with one noting that it is received for New Connections and CoMC processes. The other MOA confirmed that they manually process the flows. Elexon presented this view to the Issue Group and stated that responses indicate that some parties were aware of this flow, although it adds limited value to their processes. Some WG members recognising that the MOA have visibility of the flow felt that there was some valid arguments to retain the D0215 flow.

Question 2 – Value of the D0215 flow

We asked this question to understand the value of the D0215 flow to parties. 31% (4 out of 13) of the respondents believe that the D0215 flow adds value to their operational processes whereas 46% (6 out of 13) of the respondents believe that it does not. The minority made no comments.

The 31% who believed the D0215 flow adds value to their processes highlighted the following areas where it adds value:

- I. Investigating Current Transformer (CT)/Voltage Transformer (VT) issues;

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- II. Verifying the information received in the D0268 'Half Hourly Meter Technical Details' flow that is received as part of the [P283](#)⁷ commissioning process; and
- III. If populated correctly, can be useful in the New Connections and CoMC processes.

The Issue Group noted the feedback from the respondents who valued the D0215, stating that it adds to the rationale for not removing the D0215 flows from current industry processes.

Question 3 – Removing the optional fields in the D0215 flow

We asked this question to confirm whether industry made use of the optional fields in the D0215 flow.

The majority of respondents felt that the optional fields should be retained, noting that there is a risk that certain information (e.g. CT/VT ratio) that aren't placed in the mandatory fields, could be lost. It was an equal split between the minority who felt that the optional fields should be removed and the respondents who did not comment.

The Issue Group noted the views and agreed that the optional fields should not be removed given that it provides an opportunity to capture some useful information about the Metering System, which would not typically be placed in the mandatory field.

Question 4 – view on the relevance of the footnotes in BSCP515 and the REC MO Schedule

This question stemmed from a conversation the Issue Group had on the footnotes (5 and 55 respectively) in BSCP515 and REC MO Schedule, which incentivises MOAs to request the D0215 data flow at any time. The Issue Group felt that it was valuable to review the requirement to ensure that it encourages MOAs to request the D0215 flow only when it is required.

The majority of respondents felt that the footnotes could be amended to de-incentivise MOAs from requesting the D0215 via an automated D0170 data flow, but request it only when needed. The minority of respondents that agreed with the footnotes noted that the option to re-request the site technical details at any time after a new connection is sometimes necessary.

The Issue Group noted the feedback from the respondents and concluded that the footnotes in BSCP515 and the REC MO Schedule should be updated to ensure that MOAs are only requesting the D0215 flow (i.e. sending the D0170) when required.

Questions 5 and 6 – Effort and value of processing the D0170 request

This question was asked to LDSOs to understand how much time and effort is spent processing D0170 requests, and from those requests, what percentage is valid.

We received numerical data from four LDSOs suggesting that the D0170 offered very little value to them compared to the volume of request received. Collectively, the LDSOs receive around **9,000 D0170 requests** on average on a monthly basis, which equates to approximately **two (2) FTE per month** processing these requests. Around **10% of the D0170 requests** were valuable to them.

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⁷ <https://www.elexon.co.uk/mod-proposal/p283/>

The Issue Group noted this and agreed that the data from LDSOs supports the rationale for amending footnotes 5 and 57 in BSCP515 and the REC MO Schedule respectively, which will prevent higher than required D0170 requests from MOAs.

Question 7 – Industry’s preferred solution option

We presented four solution options to industry, asking them to confirm their preferred option and why.

The majority of respondents preferred solution option 4, which combines the solution from options 2 and 3. This means that the recommended solution will contain a requirement that limits MOAs from requesting the D0215 flow to certain processes and retaining only the mandatory fields in the D0215 flow. The WG considered the responses and rationale from Industry and agreed that the new option 4 should be progressed as a prudent approach. Retaining the D0215 flow and its mandatory fields will ensure that the parties who utilise the flow for general investigative processes still have access to the D0215 flow and the important information contained in the mandatory fields, the WG added.

Redline text review and Issue 99 solution

At the final Issue 99 Workgroup meeting, Elexon and REC stepped through the proposed changes made to the BSCP515 and REC MO Schedule 14 documents following the principles agreed at the previous Workgroup meeting. Elexon outlined the thought process behind the BSCP515 changes, which were:

- Section 3.3 ‘New SVA Metering System’ amended to exclude the steps in the process that required the MOA to request the D0215 flow from the LDSO. This amendment was made in line with the Workgroup’s and industry’s view that the D0215 flow added no value in the ‘New SVA Metering System’ process;
- Added a footnote in Section 3.3 ‘New SVA Metering System’ to limit the scenarios for which a D170 request for the D0215 flow, can be sent by the MOA. This was in line with the Workgroup’s and Industry’s view;
- Formalising the requirement for LDSOs to send the D0215 flow following a change to the Site Technical details; and
- Excluding the use of the D0215 flow in the CoMC process outlined in section 3.11.

REC outlined the thought process behind the proposed REC MO Schedule 14 changes, which were:

- Amend section 6.6 to remove the requirements for sending or requesting the D0215 in the Half Hourly Meter Asset Installation process; and
- Footnotes 18 and 34 removed, as they were not required for the processes to function, while footnote 55 amended to specify that the D0215 flow should only be requested in certain scenarios only.

The Workgroup noted the changes and had no comments on the proposed text nor the intent of the text. However, one member wanted to clarify if, post implementation of the respective changes, LDSOs or potentially Elexon would monitor the number of D0215s received. Some LDSOs stated they do have automations in place to monitor while others stated they would rely on manual processes to inspect and understand what each query relates to. The expectation from most LDSOs was that the MOA would implement steps in their processes to follow the new guidelines that are proposed to be introduced by Issue 99.

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A Workgroup member noted that in order to stop sending some D0215 data flows, some MOAs may need to implement a system change. Elexon added that a consultation question would be asked as part of the CP procedure, to confirm from MOAs if they require a system change to support the proposed solution. Elexon stated that the responses from MOAs would determine the extent to which Elexon will monitor the D0215 flow post implementation.

4. Conclusions

There were three Issue 99 Group meetings held, on [5 April 2022](#)⁸, [2 August 2022](#)⁹ and [25 January 2023](#).

The Proposer asked the Issue Group to consider, as part of its assessment:

- Whether the D0215 data flow should be removed from all of the applicable industry processes or retained;
- How the D0215 associated processes can be improved;
- What documents need to be updated to effect the desired change; and
- How the solution should be progressed.

The Issue Group considered the responses from industry received following an RFI, the arguments for and against removing the D0215 flow, and the D0215 associated process.

They concluded that the D0215 data flow should be removed from the “New Supplier Volume Allocation (SVA) Metering System connection process” and the “Change of Measurement Class (COMC) process”. They agreed that the D0215 data flow should be retained in general investigative processes (e.g. CT/ VT mismatch issues).

Further, the Workgroup agreed to recommend that changes should be raised via the BSC and REC change processes to propose the agreed amendments in BSCP515 and the REC MO Schedule 14 respectively.

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⁸ <https://www.elexon.co.uk/meeting/issue-99-workgroup-1/>

⁹ <https://www.elexon.co.uk/meeting/issue-99-workgroup-1-2/>

Issue Group membership and attendance

Issue 99 Group Attendance				
Name	Organisation	5 April 22	2 Aug 22	25 Jan 23
Keren Kelly	Elexon (Chair)	x	✓	✓
Stanley Dikeocha	Elexon (Lead Analyst)	✓	✓	✓
Chris Wood	Elexon (Design Authority)	✓	✓	✓
Lee Walker	Elexon (Subject Matter Expert)	x	x	✓
Ivar MacSween	Elexon (Supporting Chair)	✓	x	x
Christopher Day	Elexon (Subject Matter Expert)	✓	✓	x
Dawn Matthews	UK Power Networks (Proposer)	✓	✓	✓
David Brown	Association of Meter Operators	x	✓	✓
Dan Rynne	IMServ	x	✓	✓
Carrie-Anne Lewis	SMS Plc	✓	✓	✓
Oliver Bates	SMS Plc	✓	✓	✓
Bo Kariahuua	Smartest Energy	✓	x	x
Neal Baird	Engie Plc	x	✓	x
Harriet Truss	REC	✓	✓	x
Michael Taylor	REC	✓	✓	x
George Barnes	REC	x	x	✓
Ryan Dale	REC	x	✓	✓
Leanne Yates	Northern PowerGrid	✓	x	✓
Warren Lacey	Northern PowerGrid	✓	x	x
Nicola Drew	Northern PowerGrid	✓	✓	x
William Mckay	SSE Networks	✓	✓	✓
Elaine Carr	SP Energy Networks	x	x	✓
Phillip Mark	SSE – Distribution	x	✓	✓
Tim Porter	SSE – Distribution	x	✓	✓
John Greene	SSE Solutions	x	x	x
Barry Winterbottom	Eon Energy	x	x	✓

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Anne Themistocleous	UK Power Networks	x	x	✓
Nikki Sturgess	UK Power Networks	x	x	✓
Michael Messenger	IMServ	x	✓	x
Jessica Davies	Elexon (Assurance)	x	x	✓

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