Assessment Procedure Consultation Responses

P455 ‘On-Site Aggregation as a method to facilitate Third Party Access’

ELEXON

Phase

- Initial Written Assessment
- Definition Procedure
- Assessment Procedure
- Report Phase
- Implementation

This Assessment Procedure Consultation was issued 15 December 2023, with responses invited by 19 January 2024.

Consultation Respondents

Respondent	Role(s) Represented
Cepro	Generator, Supplier, Consultant, PNO
ENGIE	Supplier
IMServ	Supplier Agent
Northern Powergrid	Distributor
SNRG	Independent Distributor, PNO
Stark	Independent Distributor, Supplier Agent
UK Power Networks (UKPN)	Distributor

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Question 1: Do you agree with the Workgroup's initial unanimous view that P455 does better facilitate the Applicable BSC Objectives than the current baseline?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	We agree with the proposer that Objectives C, D and E are better facilitated for the reasons stated.
IMServ	Yes	Following clarification today, we agree with this proposal. Looking ahead to MHHS, how would this service continue to be delivered? It would be useful to include some thoughts around future proofing this Modification for MHHS. Would such schemes be subject to SVG (or similar) approval?
Northern Powergrid	Yes	We agree with the P455 Workgroup that Applicable BSC Objectives (c) and (e) are better facilitated by P455, and both driven by the resulting increase in competition in electricity generation and supply specifically relating to domestic and small non-domestic customers.
SNRG	Yes	SNRG are supportive of P455 as we believe it furthers Objective (C) to improve the facilitation of competition for the consumer and Third Party Suppliers. More importantly in its proposed method of implementation, we consider it to be more efficient and beneficial than current arrangements.
Stark	Yes	As a Workgroup member my views were that P455 is positive for BSC Objectives (c) & (e).
UKPN	No	Although we understand the workgroup's view on the objectives we feel that due to the solution only dealing a small part of the TPA arrangements it does not better facilitate any of the BSC objectives. However we feel that there is a likelihood that Objective D could be negatively impacted as if utilised by a large number of customers (and this has not been determined); it could create significant

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Respondent	Response	Rationale
		additional work for the BSC and existing industry parties.

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Question 2: Do you agree with the Workgroup that there are no other potential Alternative Modifications within the scope of P455 which would better facilitate the Applicable BSC Objectives?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	
IMServ	Yes	
Northern Powergrid	Yes	We consider P455 to be appropriate, trialled and tested, and have no other proposed solution for the Workgroup to consider.
SNRG	Yes	We agree with the Workgroup that there are no other potential modifications what would better facilitate the BSC Objectives in these scenarios.
Stark	Yes	
UKPN	No	We would agree that this is the only solution available to address the change as proposed which is limited in its scope, whilst trying to work within the existing industry arrangements and systems. It could be that other options are available to better facilitate a solution as this change is restricted to '…..private networks with TPS Metering Systems and with Import only sub-meters that are sub100kW capacity', if the scope of the change was wider it would likely allow a more complete solution to be considered. Also would this solution as developed work if the site had excess export being generated and needed to push this onto the wider network, which is likely to be the case going forward for some impacted sites?

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Question 3: Do you agree with the Workgroup that the draft legal text in Attachment B delivers the intention of P455?

Summary

Yes	No	Neutral/No Comment	Other
6	0	1	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	No comment	We have not reviewed the legal text.
IMServ	Yes	
Northern Powergrid	Yes	We are generally comfortable with the proposed legal text but flag the following minor points relating to Attachment C (BSCP502): See section “On-Site Aggregation Option”, first paragraph: typo where “sa” should be “a”, and there is a missing closing parenthesis after “sub-meters”. Same section, third paragraph (starting “The above example”): it is not clear which terms the “shall have the meaning as set out in” applies.
SNRG	Yes	Subject to any further parties’ comments or submissions we have no comments or amends to Attachment B (Section K_v49.1)
Stark	Yes	
UKPN	Yes	Yes we are comfortable that the legal text as drafted would deliver the solution as proposed.

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Question 4: Do you agree with the Workgroup that the draft amendments to the CSDs in Attachment C deliver the intention of P455?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Comments
Cepro	No	**Location: 4.9.3 On-Site Aggregation Option** I thought the working group decided that equipment like solar and battery storage would be exempt from the COP10 metering requirement. If this is the intention then it should be made clearer in the legal text, as it currently only states: *"All meters involved in the on-site aggregation must be Half Hourly Settled and compliant to CoP 10"*. There is no reference to metering requirements in the *"Export on Licence Exempt Distribution Networ*k" section. **Location: 4.9.3 On-Site Aggregation Option** The formatting/syntax used for the example calculation of *"E (AE-AI) – (C+D)"* is quite confusing in my opinion. Use of a proper equation formatter with subscripts and symbol definitions may help clarify the meaning.
ENGIE	Yes	No comment
IMServ	Yes	
Northern Powergrid	Yes	Subject to the response to question 3, we are comfortable with the amendments.
SNRG	Yes	We agree that the drafting set out in Attachment C delivers on the intention of P455. However, we note 2 cosmetic amends on Page 93. BSCP502_v40.1 Pg 93 Reads " who have not chosen sa Third Party Supplier". Last line of 2nd last paragraph Correct to "who have not chosen a Third Party Supplier". BSCP502_v40.1 Pg 93 Reads " i.e. those Meters connections related to" 2nd last line of 2nd last paragraph Correct to "i.e. those Meter connections related to"

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Respondent	Response	Comments
Stark	Yes	
UKPN	Yes	Yes we are comfortable that the CSDs as drafted would deliver the solution as proposed.

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Question 5: Do you agree with the Workgroup's assessment of the impact on the BSC Settlement Risks?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	The requirement for the sub-metering being used for the Private Networks customers for the aggregation of consumption data to meet CoP10 standards provides assurance on this point.
IMServ	Yes	We agree that this Modification introduces no new Settlement risks
Northern Powergrid	Yes	We are comfortable with the Workgroup's assessment, and agree the risks are generally low.
SNRG	Yes	As discussed at Working Group 5 (and documented) there are some small risks in the registration, DR (Data Retrieval) and revenue protections processes. However, we see the majority of the risks provided for in the proposal changes to Section K and BSCP502 as drafted in the provided attachments.
Stark	Yes	
UKPN	No	We believe that the risk to settlements could be greater than anticipated due to the volume of customers which could be involved in these revised arrangements being unknown. The limit is apparently set at 100kW per customer (or submeter) so across any Private Network the total settlement risk could be substantial. This is a complicated arrangement dependent on the diligence and propriety of the Private Network Operator (who may/may not be overseen by the HHDC/HHMOA) with the proper summation of submeters and the avoidance of unmetered loads. The ability for customers to toggle between boundary/landlord supply and Third Party Access (MPAN) arrangements increases the chance of errors.

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Question 6: Do you agree with the Workgroup's assessment of the consumer benefits?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	This change will benefit consumers though easier facilitation of third party supply for customers on private networks.
IMServ	Yes	We agree that this Modification introduces no new Settlement risks
Northern Powergrid	Yes	We are comfortable with the Workgroup's assessment. Specifically relating to customer bills, this is subject to (i) associated and appropriate changes being made to "commercial codes" such as the Distribution Connection and Use of System Agreement, and (ii) transparency in how costs are passed through to end users via retail charges.
SNRG	Yes	Yes we see this modification facilitating consumer choice.
Stark	Yes	
UKPN	Yes	We believe that the workgroup has identified the benefits to consumers which would be a positive improvement to the current arrangements.

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Question 7: Do you agree with the Workgroup's assessment that P455 does not impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
6	0	1	0

Responses

Respondent	Response	Rationale
Cepro	Unsure	
ENGIE	Yes	P455 is in alignment with EU Directive 2009/72/EC which has already been implemented in UK law via Schedule 2ZA to the Electricity Act.
IMServ	Yes	
Northern Powergrid	Yes	We are comfortable with the Workgroup's position.
SNRG	Yes	We support the Working Group assessment.
Stark	Yes	
UKPN	Yes	We do not believe that the EBGL Article 18 is impacted by this change.

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Question 8: Will P455 impact your organisation?

Summary

High	Medium	Low	None	Other
0	2	6	0	0

Responses

Respondent	Response	Rationale
Cepro	Low	The new onsite aggregation methodology will allow us to much more easily facilitate a microgrid customer (a customer on one of our private networks) to switch to an alternative supplier.
ENGIE	Low	We expect the impact upon ENGIE as a supplier to be low. For customers covered by P455 requesting a Third Party Supply from ENGIE we should see a reduction in complexity and an increase in efficiency as we will not need to go through the complexities of the Difference Metering process including engagement with the Boundary Supplier to the Private Network.
IMServ	Medium/Low	The slight reservation we have, in terms of impact, is the scalability of the solution. Given the BP HHMO/DC will need to construct and apply a Complex form for (in this example aggregating M2+M3-M4 and probably scaling up for losses) this is a completely manual process and therefore time consuming and prone to error. Should volumes increase in future, an alternative approach would be required. In terms of the TP element this does seem scalable providing the TP HHDC doesn't need to apply losses to any of the TP customer meters.
Northern Powergrid	Low	We agree with the Workgroup that P455, in isolation, will have a low impact on LDSOs.
SNRG	Medium	Medium - We foresee some measurable and manageable changes to our business processes. However, we believe the benefits to consumers are significant and achievable as set out in the consultation. Most of the changes are realignment of business processes in customer billing, customer contact and agent appointment.

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Respondent	Response	Rationale
Stark	Low	As HHDC will need to make minor process adjustments to distinguish between the new & existing validation test. As HHMOA will be impacted by requirements as detailed in REC change R0150, however the number of meters involved is expected to be low.
UKPN	Low	As a Distribution business we assume that we would be required to raise additional MPANs for each site to allow TPA? What is the process for this and for being notified of the TPA site? How are De-Energisations and Disconnections dealt with as well as new connections? We would require a method for knowing that they are not a TPA site in a power cut or for Priority Services notifications. Currently without a DCUSA change we would only charge DUoS as per the current methodology and so are surprised that a DCUSA code change has not been taken forward alongside P455 in order to deliver a complete solution. It's not clear how this would impact the operation of our Unauthorised/Unregistered Supplies Team which has broad experience of electricity theft on private networks. Private submeters (which are NOT downstream of a registered Settlement Meter) might now be legitimate installations. Distribution Businesses would need to understand (a) where such arrangements have been established; and (b) which premises on the Private Network are via the bulk/landlords supply. Would a premise on the Private Network that didn't have a registered TPA MPAN of it's own and that wasn't part of the PNO's summation (i.e. effectively unmetered regardless of the presence or otherwise of private metering) be a Revenue Protection issue for the Supplier of the Boundary/Landlord MPAN or fall within the Distribution Business' remit as an unregistered supply?

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Question 9: How much will it cost your organisation to implement P455?

Summary

High	Medium	Low	None	Other
0	0	4	2	1

Responses

Respondent	Response	Rationale
Cepro	Low	
ENGIE	None	There is no implementation cost associated with this proposal for ENGIE, we should see a slight reduction in overheads by not having to go through the Difference Metering process for customers seeking a Third Party Supply.
IMServ	Low	In many ways this is an extension of the current Complex arrangements as applied to TPO sites.
Northern Powergrid	None	In isolation, we do not anticipate P455 resulting in any implementation costs.
SNRG	Low	As set out in the consultation we expect the costs to Low as categorised above
Stark	Low	
UKPN		The majority of our costs will be in working hours dealing with enquiries and ensuring that all TPA sites are correctly recorded and we are receiving the boundary data as expected, as a result the cost is impossible to determine at this time, depending upon the DCUSA change it could require system changes which are unknown at this time.

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Question 10: What will the ongoing cost of P455 be to your organisation?

Summary

High	Medium	Low	None	Other
0	1	3	3	1

Responses

Respondent	Response	Rationale
Cepro	None	
ENGIE	None	There is no implementation cost associated with this proposal for ENGIE, we should see a slight reduction in overheads by not having to go through the Difference Metering process for customers seeking a Third Party Supply.
IMServ	Low	The cost to serve Complex/Shared/Third Party Network and Shared Arrangement sites are high due to their bespoke and manual nature. This modification probably adds a greater number of sites falling into these types of arrangements. Costs will be relatively modest given the above comments although higher than a typical SVA traded site. Costs will rise in proportion to the number of sites being serviced and how complex the arrangements become.
Northern Powergrid	None	In isolation, we do not anticipate P455 resulting in any ongoing costs.
SNRG	Low/Medium	We expect these costs to be Low to Medium in the early years. While P455 removes a lot of the complexity to support the consumer's choice, it does not remove it fully. We expect some costs to impact us in support of working with external agents and other adjacent arrangements in support of the Third Party Suppliers in these scenarios.
Stark	Low	
UKPN		As per the response to Q9 without a DCUSA solution we cannot determine the size of the overall change, as a result it is impossible to determine the ongoing cost to facilitate.

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Question 11: How long (from the point of approval) would you need to implement P455?

Summary

0-6 months	6-12 months	>12 months	Other
2	1	0	3

Responses

Respondent	Response	Rationale
Cepro	6 months	
ENGIE		We are in agreement with the Workgroup's proposal of 29 June 2024. From our perspective this change will not require any systems changes and can be implemented outside the normal BSC Systems release cycle.
IMServ	3 months	We don't believe as a HHDC, we need to add any new functionality to my core systems, but rather, just be prepared to manually create and maintain aggregation rules for a larger number of MPANs.
Northern Powergrid	n/a	In isolation, we do not anticipate P455 resulting in a need to implement any changes
SNRG	3 months	We would suggest a 3 month timescale of the target date of July - whichever comes sooner. The implementation is low impact as a solution - as it is an addendum to the Question 11 current BSCP under Complex Sites, with minimal amends to existing codes, rather than create a new way of facilitating third party access.
Stark		
UKPN		As per the responses to Q9 and 10 it will depend upon the wider solution (including any changes to DCUSA) before we would be in a position to determine the lead time required for any change.

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Question 12: Do you agree with the Workgroup's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	We are in agreement with the Workgroup's proposal of 29 June 2024. From our perspective this change will not require any systems changes and can be implemented outside the normal BSC Systems release cycle.
IMServ	Yes	We assume the implementation date will be 3 months after Authority approval.
Northern Powergrid	Yes	We are comfortable with the Workgroup's recommendation.
SNRG	Yes	We agree to the suggested implementation date of the 29th June 2024.
Stark	Yes	
UKPN	No	We believe that a DCUSA change is required to fully deliver any solution. Also, further clarification as to how this would practically operate across myriad parties both within and beyond the BSC with corresponding concerns as to settlement impact. We note that some of the outlined controls are themselves dependent on the Consultation outcome. As a result we do not believe that the date proposed is practical or appropriate.

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Question 13: Does the proposed On-Site Aggregation methodology result in accurate settlement outcomes (particularly in relation to difference metering)?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
Cepro	Yes	
ENGIE	Yes	The proposed methodology has the potential to result in more accurate settlement outcomes than the use of Difference Metering as it removes the need to compensate for losses between the boundary point meter and the “embedded” meters. Settlement risk is also minimised by the requirement for the sub-meters to be CoP 10 standard and managed by the boundary point supplier’s agents.
IMServ	Yes	Losses between the DNO boundary and the Sub Meters do need to be considered and applied where necessary, but this is no different to the current approach that feature a Private Network arrangement.
Northern Powergrid	Yes	We are comfortable that the Proposer has evidenced the accuracy of the proposed On-Site Aggregation methodology via the BSC Sandbox trial.
SNRG	Yes	We believe this will support accurate settlement outcomes as set out.
Stark	Yes	For the intended requirements the proposed methodology is more suitable than difference metering as it is simpler and more operationally efficient.
UKPN	No	We are concerned that any aggregation utilising privately-managed submeters rather than the traditional boundary meter data could have an impact upon the accuracy of settlements. This will only be known and understood once any solution is fully tested on a wider scale involving multiple parties.

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Question 14: What testing should be required to validate the solution is correctly implemented, and should this include an unmetered load tests?

Responses

Respondent	Rationale
Cepro	A physical unmetered loads test should not be required due to access restrictions and physical challenges of carrying out such a test. But testing that all relevant parties have the correct calculations and come to the same aggregated volumes would be appropriate.
ENGIE	No unmetered load testing should be required on the grounds of cost, efficiency and the fact that in the current difference metering solution the presence of unmetered supplies.
IMServ	This isn't a valid consultation question to ask. The Modification Group should propose something and Industry and PAB, perhaps, respond? However, one possibility is an annual check against the values being recorded at the Boundary Meter? Obviously this would require all the consumption data for both TP and PNO meter points to be aggregated together and compared with the BP data, so could prove difficult/onerous. Also who would this obligation be placed on, who would be obligated to provide data to whom?
Northern Powergrid	We support the Workgroup's position, including P455 not testing unmetered loads due to disproportionate cost and benefits; and being comparable to Difference Metering.
SNRG	As set out on in the attachment drafting. We would expect to co-ordinate with a HH MOP to assess sites (as before) with complex sites, including unmetered load tests – where relevant.
Stark	No additional testing is required.
UKPN	All arrangements need to be tested including all types of customers who could be connected on any TPA sites, E2E testing of the solution proposed needs to be undertaken using more than a single type of party for each stage to ensure that what is being proposed is robust and will work when utilised on a wider scale. Testing of unmetered loads would increase the robustness of the on-site checks but would only reflect the situation at a point in time; unmetered loads may arise later when the Private Network is expanded or premises are subdivided or otherwise reconfigured.

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Question 15: Is it right that the boundary meter HHDC and HHMOA are responsible for operations related to the sub-meters, given private network operators are responsible for these meters on a day-to-day basis, and given the move to new arrangements under MHHS?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response
Cepro	Yes
ENGIE	Yes. The private network operator is the customer of the boundary point supplier and as such it is appropriate that the boundary point supplier-appointed agents are responsible for the day-to-day operations of the sub-meters. Note however that the solution may not require a boundary meter, so it may be more appropriate to refer to the boundary MPAN HHDC and HHMOA.
IMServ	Not sure, don't really understand the question. If 'responsible' means the usual activities associated with a HHMO and HHDC, then yes. Not sure what other meaning this could have. Also, it is a bit odd that MHHS mentioned at this point given the rest of the document doesn't touch on MHHS at all.
Northern Powergrid	Yes. We support the Workgroup's position that it is right that the boundary meter HHDC and HHMOA are responsible.
SNRG	Yes. We expect the HHMOA to have the relevant skills and experience to react quickly (and safely) in the event of any faults with the metering equipment.
Stark	Yes. Less complications as the boundary meter HHDC and HHMOA will be qualified Supplier Agents.
UKPN	No. The changes being seen to the metering arrangements as a result of MHHS need to be fully considered in this context. It may be preferable for a single party to be responsible for the operation of the meters; having two parties involved increases any risks to settlement accuracy. That responsible party (or parties) should be BSC-qualified and subject to BSC Audit and BSC Performance Assurance Frameworks to better protect settlement integrity. Control should not be devolved to a Private Network Operator even if they physically enact certain elements with the oversight of industry parties.

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Question 16: Is it right that the sub-meters should conform to COP10 standards?

Summary

Yes	No	Neutral/No Comment	Other
7	0	0	0

Responses

Respondent	Response
Cepro	For final-consumption customers like small businesses and domestic consumers - yes. But I thought the working group decided that sub-meters for solar generation and batteries (which are not final-consumption) should not need to conform to COP10 because that would unduly limit them to 100kW, and may not be the most appropriate metering category (e.g. COP11, or COP5 may be more appropriate in some cases).
ENGIE	Yes. The proposed methodology has the potential to result in more accurate settlement outcomes than the use of Difference Metering as it removes the need to compensate for losses between the boundary point meter and the “embedded” meters. Settlement risk is also minimised by the requirement for the sub-meters to be CoP 10 standard and managed by the boundary point supplier’s agents.
IMServ	Conformity to other COPs (e.g. 5) on the PNO side would also be acceptable so not sure why COP10 is called out specifically even though it is the most likely COP to be used on the TP side.
Northern Powergrid	Yes. We support the Workgroup’s position that P455 is limited to import only submeters that are COP10 compliant.
SNRG	Yes. No further comment
Stark	As import only will help ensure accurate Settlement results.
UKPN	Yes. Yes, it is vital that all meters including sub-meters confirm to the appropriate COP arrangements.

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Question 17: Should there be a requirement for Elexon to maintain a central database of sites where on-site aggregation is applied? Do the benefits of maintaining a central register outweigh the costs of creating and maintaining his central register? Do PNOs/DNOs have all the necessary data to manage schemes?

Summary

Yes	No	Neutral/No Comment	Other
6	0	1	0

Responses

Respondent	Response
Cepro	A central register would be beneficial for transparency, research and analysis of the scheme.
ENGIE	Yes. We agree with the use of the On-site Aggregation Form as outlined in the proposal.
IMServ	This depends on what would its' purpose be / who and how would it be used? What is the expected cost, how would it be maintained, how would Elexon verify its' accuracy? We believe this is being discussed further in the next work group meeting. If there is a clear use/low cost/easy to maintain use case then we would be in favour.
Northern Powergrid	Yes. We support the Workgroup's position regarding the use of an Aggregation Metering System Form used to create a central repository.
SNRG	Yes. Longer term central provision of the data held contiguously would be beneficial to all, especially as churn of assets grows in this sector. However, we would expect PNO's to maintain accurate and timeous asset registers, making the data available as required to facilitate settlements issues, within the confines of data protection also.
Stark	Yes. To maintain records of the On-Site Aggregation Metering Systems Forms.
UKPN	Yes. We believe that a central database is vital, as parties will require a method of confirming where there is any doubt that on-site aggregation is being applied. Consideration should be given to this being a 'live' record that records which premises are settled via on-site aggregation as varied from time-to-time. This helps avoid premises accidentally 'disappearing' from both on-site aggregation and TPA arrangements. Only once a full solution is known will it be

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Respondent	Response
	possible for all parties (including DNOs and PNOs) to determine whether they have access to all necessary data.

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Question 18: Is there an impact on BSC Metering Dispensations?

Summary

Yes	No	Neutral/No Comment	Other
1	5	1	0

Responses

Respondent	Response
Cepro	Unsure
ENGIE	No. There will be no need to apply for metering dispensations for the relevant meters affected by the proposal.
IMServ	Yes. We assume more would be required.
Northern Powergrid	No. We support the Workgroup's position that P455 should have no impact on BSC Metering Dispensations.
SNRG	No. Metering Dispensation is not required as all the entry and exits points of the Licence Exempt Network (i.e. PN) are metered
Stark	No.
UKPN	No. At the current time we do not believe that there will be any impact on BSC Metering Dispensations

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Question 19: Is a Cost-Benefit Analysis required?

Summary

Yes	No	Neutral/No Comment	Other
2	5	0	0

Responses

Respondent	Response
Cepro	No
ENGIE	No. There are not sufficient costs associated with implementing the proposal to justify this.
IMServ	Yes. This should consider whether this arrangement is to be carried forward into MHHS or not. If not, it is unlikely to have a positive CBA.
Northern Powergrid	No. We are comfortable that a Cost-Benefit Analysis is unnecessary.
SNRG	No. As we anticipate the impact to the industry and PNO to be low, then we would be minded that a CBA is not required. However, we would support any assessments Ofgem feels are necessary to validate this assumption.
Stark	No.
UKPN	Yes. Yes it is vital, the cost to these changes coming at a time when MHHS is being introduced needs to be fully understood in the context of the perceived benefits which will be seen if they were to be introduced.

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Question 20: Is it right that the scheme is limited to sub-100kW sites?

Summary

Yes	No	Neutral/No Comment	Other
2	5	0	0

Responses

Respondent	Response
Cepro	I believe as a working group we decided *not* to include a 100kW site limitation. Instead, we decided that a restriction on the COP10 level of final consumption loads would act to keep the scheme limited to smaller consumers. I believe we also decided to exclude equipment like batteries and solar generation from the COP10 limit. Attachment A doesn't align with my understanding of the working groups decisions on this matter on a few points: 1. It states "The PWN sub-meters will be required to conform to CoP 10 standards.", but my understanding is that this was only to be true for final-consumption customers, and should not apply to generation plant like batteries and solar which are not final-consumption and may or may not be greater than 100kW. 2. It also states "The solution will be restricted to Third Party Supplied metering systems on PWNs that are sub-100kW capacity." Which seems to say the size restriction is on the *capacity of the private wires.* I find the legal text a bit ambiguous on this point too as it mentions a COP10 restriction within the "On-Site Aggregation Option" section and doesn't mention any metering restrictions in the "Export on Licence Exempt Distribution Network" section.
ENGIE	Yes. As a starting point it is preferable to limit the size of site involved so that any unforeseen impacts on settlement will be limited.
IMServ	Yes. Assuming this means sub-100kW sites in terms of Third Party customers.
Northern Powergrid	No. We support the Workgroup's position that it is not the "scheme" that is limited, but the import Metering Equipment within the On-Site Aggregation Metering System.
SNRG	Yes. As set out for import sub-metering in the proposal.
Stark	No.
UKPN	No. Our reading of the Consultation is that the limit is not 100kW "sites" but rather any size of Private Network where the individually-aggregated private submeters do not exceed a 100kW rating.

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Respondent	Response
	Nevertheless, we believe that limiting this change to a subset of customers presents an unnecessary risk and creates a cliff edge where parties exceed this limit. Presumably, beyond this they would be required to seek Difference Metering or Shared Metering solutions? As a result a solution that considers all customers should be considered rather than just for some.

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Question 21: Is it right that the MSIDs of Customers of a PN should be de-energised instead of logically disconnected, in order to minimise barriers to the Customer subsequently choosing a third party supply? Are there other ways in which the need to swap customers meters when they move in and out of schemes could be reduced/avoided?

Summary

Yes	No	Neutral/No Comment	Other
1	4	1	1

Responses

Respondent	Response
Cepro	Unsure on what is the best solution from a technical BSC process perspective, but the goal of making it easy for customers to come in our out of the PWN<->TPA repeatedly is a good goal.
ENGIE	No. We are assuming that the consumption of the PN customers would be measured by the CoP 10 meters and submitted into settlement by the boundary supplier's agents while the aggregation was in effect but that each CoP 10 meter would at that point not be a settlement meter (for example in a "new build" scenario). Should a customer opt for a TPS, an MPAN would be registered for the CoP 10 meter by the DNO and the resulting MPAN would be settled by the TPS. Should the customer then opt back into the PN, the MPAN should be logically disconnected to ensure the TPS does not attempt to settle it. The meter should however remain in situ (as a non-settlement meter) to avoid unnecessary costs to parties and disruption to the customer. If the customer again opted for a TPS, the logically disconnected MPAN should be able to be reinstated. We feel that the process by which the meters switch between being settlement and non-settlement "sub" meters as a result of moving in and out of TPS requires some further clarification.
IMServ	We don't understand this question. We thought the MB meter would be omitted from Settlement by being logically disconnected?
Northern Powergrid	No. We are comfortable with the Workgroup's position that a logical disconnection is appropriate.
SNRG	No. In line with the discussion throughout the Working Group. We would expect that a TPS adopting a site within a PNO would require a full disconnection of the previous registered supply and associated metering equipment i.e. a meter swap. We believe this would allow for assurance of the correct MTD, etc once the site is adopted by the TPS. There is no guarantee the TPS will support the incumbent meter set, so De-Energisation / Re-Energisation may have limited benefits and lead to 'dirty' data, in a small number of scenarios.

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Respondent	Response
Stark	No.
UKPN	No. This is a risk as a result of the introduction of these revised arrangements, this is largely as a result of looking to force these changes into the existing and long-standing rules. This further supports the view that a larger and more widescale consideration of what is required should be undertaken rather than rushing a solution, which we believe could significantly increase the risk to settlements and the accuracy of industry data.

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Question 22: Is it right for the solution not to be captured under the complex site arrangements within BSC?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response
Cepro	Yes
ENGIE	Yes
IMServ	We thought the intention was to add this into BSCP502?
Northern Powergrid	Yes. We are comfortable with the Workgroup's position that the On-Site Aggregation method should not be a Complex Site; consistent with other similar methods.
SNRG	Yes. On-Site aggregation is a different and more appropriate solution for these sites than Complex Sites 'differencing' methods today. So it suitable that it is an addendum to the current arrangements.
Stark	Yes. This solution is an example of totalisation which, under BSCP502, is not defined as Complex arrangements.
UKPN	No. Although the total consumption on some of the impacted sites is likely to be lower than the majority of 'complex sites' they will require a high level of scrutiny and so should be treated as complex sites, which would go some way to providing sufficient comfort to parties.

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Question 23: Is a physical boundary meter required to implement the solution, and should it be?

Summary

Yes	No	Neutral/No Comment	Other
2	5	0	0

Responses

Respondent	Response
Cepro	The calculations required to fulfil the aggregation methodology, as were reviewed and agreed by the working group, do not use data from a boundary meter. The proposer/Elexon outlined that there is no specific legal/regulatory requirement for a boundary meter, and did not identify any problematic consequences for BSC and DCUSA from having no boundary meter. As such, there appears to be no reason why such a meter is needed.
ENGIE	No. Provided the aggregation rule is in place and there is an MPAN associated with it via which the aggregated data can be settled, there does not appear to be a need for a physical meter.
IMServ	Depends if it is needed. It shouldn't be submitted to Settlements as this would double count the energy but you might want it as part of a validation process? If you wanted to validate the accuracy of the arrangement against energy leaving the DNO boundary then clearly yes. We would expect the DNO would always want to measure energy entering and leaving their network.
Northern Powergrid	No. We agree that a physical boundary meter is unnecessary for P455
SNRG	No in all instances. We understand that is one of the key benefits of this proposal.
Stark	No.
UKPN	Yes. This is necessary, as otherwise there will be no accurate method to determine if the correct units are being recorded for any TPA site.

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Question 24: What are the arguments for and against creation of a new market role for PNOs (e.g. access to industry data access; market competition)?

Responses

Respondent	Response
Cepro	For this scheme it is sensible to keep the creation of a new market role out of scope due to time constraints. But long term the industry needs a new market role in order to support growth and recognition among lay customers.
ENGIE	We do not see the need for a PNO market role as a consequence of this modification proposal and would suggest that this is a matter for wider industry governance which should not be a barrier to P455.
IMServ	We are not sure how/why such a role code is needed. This isn't a valid consultation question to ask. The Modification Group should propose something and Industry respond, else what is the point of a Work Group? This modification should be a fully formed solution.
Northern Powergrid	For a voluntary solution, we agree with the Workgroup that a new market role is unnecessary.
SNRG	In line with discussions at the Working Groups. The application of this amendment to the Complex Sites, as is, complements the current arrangements. While supporting competition and keeping the costs low. Creation of a new market role would inhibit competition, increase costs, increase delays and introduced unwarranted complexity to the market.
Stark	No requirement for a new role to facilitate methodology.
UKPN	When any arrangements for TPA has been discussed, not knowing who is a PNO and the volume of them has been a repeated problem. Having a new market role would ensure that the industry knows who is a PNO and where it's necessary to place obligations on them or to communicate on matters, it would be possible with a new market role which would be widely available to all.

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Question 25: Do you have any further comments on P455?

Summary

Yes	No
1	5

Responses

Respondent	Response
Cepro	No.
ENGIE	No.
IMServ	Yes. Doesn't this Modification have a direct impact on the MHHS SCR, we were under the impression that it would not be allowed to progress on that basis alone? If it did, this in turn means the Panel have an obligation to refer to Ofgem any Modification that impacts on a current SCR. To re-iterate a previous point - any solution would need to be supported in the MHHS arrangements, not just current legacy arrangements given the limited life of the legacy arrangements. Given the up-and-coming code freeze, is this even possible? We would also add, overall, this was a very poor consultation. It was unclear, ambiguous, incomplete, and contradictory with badly constructed CSDs. The consultation pro-forma has questions in a jumbled-up order with some of the response boxes un-editable. Having said all the above, we are grateful for the team at Elexon and the Proposer for spending time with IMServ today to clarify most of the significant issues we had previously reported.
Northern Powergrid	No.
SNRG	
Stark	No.
UKPN	No.

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