

# TEMPORARY RELAXATION OF HHDA OBLIGATIONS FOR THE INTRODUCTION OF P354 ARRANGEMENTS ON 1 APRIL 2020

**MEETING NAME** Supplier Volume Allocation Group

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**Owner/author** Colin Berry

**Purpose of paper** Information

**Classification** Public

**Summary** This paper invites the SVG to note the temporary relaxation of the obligations on Half Hourly Data Aggregators (HHDA) for the introduction of P354 arrangements as part of the implementation of the April 2020 Standalone Release.

## 1. Approved Modification P354

- 1.1 Approved Modification [P354 'Use of ABSVD for non-BM Balancing Services at the metered \(MPAN\) level'](#) was raised to correct the defect that Suppliers' imbalance positions were being distorted by the provision of Applicable Balancing Services to the National Electricity Transmission System Operator (NETSO) by independent aggregators which are not BSC Parties, and so did not own BM Units to which the relevant Applicable Balancing Services Volume Data ("ABSVD") could be assigned.
- 1.2 P354 will be implemented with [P388 'Aligning the P344 and P354 Solutions'](#) on 1 April 2020 as part of the April 2020 Standalone Release.
- 1.3 The introduction of the P354 arrangements will follow a "big bang" approach which requires temporary relaxation of the obligations on HHDA as set out below.

## 2. P354 arrangements

- 2.1 The solution to P354 requires the NETSO to notify to the Supplier Volume Allocation Agent:
  - 2.1.1 The SVA Half Hourly Metering Systems (called "MSIDs" in the BSC and "MPANs" in the Master Registration Agreement) that will be used to provide the Applicable Balancing Services in terms of MSID Pairs (usually one Import MSID and one Export MSID co-located at a Distribution System Boundary Point); and
  - 2.1.2 The MSID Pair Delivered Volumes for each MSID Pair for each Settlement Period relating to delivered Applicable Balancing Services "by the fifteenth day after such Settlement Day to the extent such data has been received by the Transmission Company, and in any event by the forty fifth day after such Settlement Day".
- 2.2 The SVAA will log the MSID Pairs, once validated, in the SVA Metering Systems Register in accordance with BSCP602 'SVA Metering Systems Register' and will assign the relevant Supplier and Half Hourly Data Aggregator (HHDA) to each MSID.
- 2.3 The SVAA will notify each HHDA of every MSID the SVA Metering Systems Register for which they are responsible using a D0354 'Metering System Reporting Notification'.
- 2.4 HHDA will return a D0355 'Metering System Reporting Confirmation' to the SVAA if they are the appointed agent for a MSID notified in a D0354 or will return a D0356 'Metering System Reporting Rejection' to the SVAA if they are not. There should be a maximum of one D0355 and one D0356 in response to one D0354, irrespective of the number of MSIDs in the D0354.

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- 2.5 For each MSID, HHDA's will provide Metering System Metered Volumes to the SVAA from the Effective From Date (EFD) specified in the D0354 to the SVAA using a D0385 'Metering System Half Hourly Metered Data'.

## 3. Two-stage Process to deliver the P354 Arrangements

- 3.1 There will be a two-stage process to deliver the P354 arrangements:
- 3.1.1 Stage 1 will be an initial one-off process to initiate the P354 arrangements to manage the large initial volume of MSIDs; and
- 3.1.2 Stage 2 will be an ad hoc process for all subsequent changes to the initial set of MSID, based on a much lower volume of new MSIDs per year predicted by the NETSO.

## 4. Stage 1 - Initial Process

- 4.1 The NETSO must notify the SVAA of all MSID Pairs with an EFD of 1 April 2020 by 18 March – 10 Working Days before the P354 implementation Date. The NETSO has indicated that this will be approximately 500 MSID Pairs.
- 4.2 The SVAA will then validate the MSIDs in the MSID Pairs using MRASCo's ECOES database and will load valid MSIDs into the SVA Metering System Register. The SVAA will carry this out after 1 April 2020 to minimise the number of HHDA's and Suppliers assigned incorrectly to MSIDs, and so minimise the number of rejected D0354s. We anticipate that D0354s relating to MSIDs that will have an EFD of 1 April 2020 will be issued by the end of the third week in April 2020.
- 4.3 BSCP503 Section 3.7 requires HHDA's to respond to a D0354 "within 1 full Working Day of receipt". However, the D0354 / D0355 / D0356 process was introduced originally for Electricity Market Reform Settlement Service Company and subsequently adopted by the P344 TERRE and Wider Access solution, which did not have a "big bang" implementation involving a large number of MSIDs.
- 4.4 As a result, we believe that it would be sensible to relax the above obligation on HHDA's to allow them to respond to the initial D0354 "within five full working days of receipt" on a one-off basis for Stage 1 of the process only.
- 4.5 As each HHDA will have received a D0354 after the II Volume Allocation Run (VAR) for Settlement Date 1 April 2020 has taken place, HHDA's should only be required to provide the D0385 data for the scheduled Volume Allocation Run for Settlement Date 1 April 2020.
- 4.6 BSCP508 specifies that HHDA's should submit D0385 'Metering System Half Hourly Metered Volumes' to the SVAA by "SD + 3", i.e. in time for the Initial Information (II) VAR. However, this requirement, which was introduced in December 2019 for P344 Wider Access, does not apply (see paragraph 4.7 below) and will be waived for the Initial Process.
- 4.7 This approach is acceptable, as no P354 calculations are required in the SVAA or Settlement Administration Agent (SAA) systems for the II VAR or Settlement Runs because the NETSO will not notify any MSID Pair Delivered Volumes in II Run timescales.

## 5. Stage 2 - Subsequent Ad Hoc Process

- 5.1 The existing requirements set out in BSCP503 and BSCP508 will apply to any subsequent changes submitted by the NETSO to the initial set of MSID pairs after the Initial Process has completed.
- 5.2 The NETSO is required to submit details of any new or amended MSID Pair to the SVAA at least 5 Working Days before its EFD, so the "D + 1" response time is important to allow the correct HHDA to be set up.

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- 5.3 The NETSO has estimated that there will be approximately 25 new MSID Pairs added to the SVA Metering System Register per year over a number of events, so ELEXON estimates that the impact on each HHDA per new MSID event would be sufficiently low to allow HHDA to meet the existing BSC requirements.
- 5.4 This approach is required because HHDA will be required to submit D0385s for P344 Wider Access MSIDs first for the II VAR, and HHDA systems will not differentiate between P344 MSIDs and P354 MSIDs.

## 6. Recommendations

- 6.1 We invite you to:
- a) **NOTE** that HHDA will have until 5 Working days to respond to the initial P354 D0354 from the SVAA;
  - b) **NOTE** that HHDA will not be required to submit D0385 data for the II VAR at "SD + 3" for MSIDs specified in the initial P354 D0354; and
  - c) **NOTE** that HHDA will be required to comply with BSCP503 and BSCP508 for all MSIDs notified to them after the initial P0354.

## Appendices

None

## Attachments

None

### For more information, please contact:

Colin Berry, Market Architect

Colin.berry@elexon.co.uk

020 7380 4112