

Minutes

Supplier Volume Allocation Group (SVG)

Meeting number **SVG236**

Venue **Teleconference**

Date of meeting **6 October 2020**

Classification **Confidential**

Attendees and apologies

Attendees

Oliver Meggitt	OM	Chairman
Sarah Ross	SR	Vice Chair
Roan Chavez	RC	Technical Secretary
Freya Gardner	FG	Elexon, presenter
Lawrence Jones	LJ	Elexon, presenter
Mike Smith	MS	Elexon, presenter
Faysal Mahad	FM	Elexon, presenter
Dnieper Cruz	DC	Elexon, presenter
Andy Ferreira	AF	Elexon, presenter
Adam Jessop	AJ	Elexon, presenter
Sedef Kiris	SK	Elexon, presenter
Colin Berry	CB	Elexon, observer
Iain Nicoll	IN	Elexon, observer
Kevin Spencer	KS	Elexon, observer
Elliott Harper	EH	Elexon, observer
Stephen Newsam	SN	Elexon, observer
Jeremy Caplin	JC	Elexon, observer
David Thomas	DT	Elexon, observer
Tom Edwards	TE	Panel Sponsor
Paul Hart	PH	Distribution System Operators Representative
Derek Weaving	DW	Industry Member
Jonathan Priestley	JP	Industry Member
Vijay Chikoti	VC	Industry Member
James Evans	JE	Industry Member
Terry Carr	TC	Industry Member
Gareth Evans	GE	Industry Member
Ian Hall	IH	Industry Member
Phil Russell	PR	Industry Member
Tom Chevalier	TOC	UMSUG Member
Duncan Cockburn	DC	Openreach

Apologies

Grahame Neale	GN	Industry Member
Jono Liddell	JL	Industry Member
Kevin Woollard	KW	Industry Member

Jamie Greening	JG	Industry Member
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OPEN SESSION – OTHER ITEMS

1. Headlines of BSC Panel Meeting 305

- 1.1 Elexon presented the MDD Targeted Charging Review (TCR) changes, following the SVG's referral from the previous meeting (SVG235/01). Elexon highlighted the SVG's concerns on the impact on Settlement and the policy-level decision making required to approve the changes. The Panel expressed a range of views and shared concerns on large volumes of changes and lack of testing involved. The Panel deferred the matter until sufficient testing and industry consultation has taken place. The Panel approved the non-TCR impacted changes.
- 1.2 An SVG Member asked whether the April 2021 implementation date had some flexibility. The SVG Chair responded that this was the case, following from discussions with industry.
- 1.3 An SVG Member expressed comfort in the fact that the Panel agreed with the SVG's concerns.
- 1.4 Modification P415 'Facilitating access to wholesale markets for flexibility dispatched by Virtual Lead Parties' will be presented to the next Panel meeting.
- ACTION 236/01:** SVG Member to email Panel Sponsor with questions and concerns to be included in the Panel paper on P415.
- 1.5 The SVG:
- a) **NOTED** the headlines from BSC Panel Meeting 305.

OPEN SESSION – DECISION PAPERS

2. MDD Change Requests for Version 303/304 – (SVG236/01)

- 2.1 This paper invited the SVG to approve four General Change Requests, and note 11 Fast Track Change Requests, for implementation in Version 303 of Market Domain Data (MDD) with a go-live date of 21 October 2020. It also invited the SVG to approve one General Change Request that has been submitted to support the implementation of Ofgem's Targeted Charging Review (TCR) and DCP268 'DUoS Charging Using HH Settlement Data', for implementation in Version 304 of MDD with a go-live date of 18 November 2020. It also invited the SVG to defer two General Change Requests submitted to support the TCR.
- 2.2 An SVG Member observed it is difficult to believe that 1,600 LLFC requests for M3650 relate to DCP268. They noted that any Change Request from Distribution Network Operators (DNO) would be approved if it relates to DCP268. Elexon responded that half of the Change Requests are for DCP and the other half for TCR. Elexon added that if the SVG defer or reject the M3650 Changes, the Party will re-submit with the changes required for DCP268 only. The Distribution System Operators (DSO) Representative noted that keeping the DCP268 and TCR changes together would benefit other Parties as they could do on single migration exercise, clarification to Suppliers on tariffs and it would make the whole process smoother.
- 2.3 The DSO Representative also raised that there is a lot of consternation among DNOs' about the uncertainty of testing and that the concerns, while all valid, have come out late in the process. DNO's are therefore concerned about the impact to delivery and the resulting feedback from Ofgem.
- 2.4 An SVG Member asked for Elexon's views on timescales. The SVG Vice Chair responded that timescales would depend on testing being successfully completed. This would include testing data flows that would be impacted by LLFCs. The DSO Representative commented they would support an implementation with as early timescales as possible.
- 2.5 The SVG:
- a) **APPROVED** four General Change Requests for implementation in MDD 303 with a go-live date of 21 October 2020;

- b) **NOTED** 11 Fast Track Change Requests for implementation in MDD 303 with a go-live date of 21 October 2020;
- c) **APPROVED** one General Change Request (M3650) for implementation in MDD 304 with a go-live date of 18 November 2020, which includes changes to support the TCR and DCP268; and
- d) **DEFERRED** two General Change Requests (M3630/M3632), which include changes to support the TCR, until the required assurances can be given to the BSC Panel.

3. Industry Request to Review Metering Codes of Practice – (SVG236/02)

- 3.1 The Association of Meter Operators (AMO) has requested a BSC Issue is raised to review certain requirements in the Codes of Practice (CoP). This paper invited the SVG to agree that this review should be initiated, to sponsor the review and comment on the timing and scope of the review.
- 3.2 An SVG Member asked if limiting the review period to 12 months would have a significant impact. Elexon responded that previous review periods tended to have delays. Given this and the type of issues to be addressed (addressing perceived ambiguity and looking to make enhancements rather than address significant risks to Settlement), they limited the review period to ensure the Issue Group focuses their efforts and prioritises issues being addressed. The SVG Member responded they would be prepared to sponsor for the review, subject to sign-off from their company.
- 3.3 The SVG Member also queried whether Elexon have considered which CoPs to prioritise. Elexon responded they have not as this will be considered by the Issue Group and the approach they wish to take. The review will look into differences between CoPs and identify quick wins across the CoPs.
- 3.4 An SVG Member stated they would also nominate themselves as a sponsor, as a reserve. The SVG Chair asked the two SVG Members to discuss the nomination offline to decide on a sponsor and alternate.

ACTION 236/02: Two SVG Members to discuss nomination and provide Elexon with a sponsor for the review of CoP requirements.

- 3.5 Elexon encouraged SVG Members to look into the upcoming metering changes in the SVG paper. Elexon added that the paper draws on previous CoP reviews and that this CoP review will involve all CoPs.
- 3.6 The SVG:
 - a) **AGREED** that the CoPs should be reviewed via a BSC Issue;
 - b) **AGREED** with the draft timetable and approach detailed in this paper;
 - c) **COMMENTED** on the timing and scope;
 - d) **NOMINATED** a sponsor for the review; and
 - e) **NOTED** that we will initiate the review in January 2021.

4. Metering Dispensation D/507 – Triton Knoll Offshore Wind Farm – (SVG236/03)

- 4.1 Triton Knoll Offshore Wind Farm Limited has applied for a lifetime Metering Dispensation (D/507) against Code of Practice 5 to not measure the low voltage supplies to Offshore Transmission Owner (OFTO) assets, through its own auxiliary transformers on the Offshore platforms, at the Triton Knoll Offshore Wind Farm. This paper invited the SVG to approve D/507 on a lifetime basis.
- 4.2 An SVG Member asked if any offshore wind farms have installed the required LV metering. Elexon responded this was the case and that since 2014, when it issued guidance for the metering Offshore wind farms (including LV supplies), it has only received five applications for LV metering. Two related to the use of Direct Current metering solutions and the other three were about not metering shared assets and either accounting for the generator share (two) or not (one).
- 4.3 The SVG Member observed that despite the rash of Metering Dispensation applications, LV metering installations could not be performed as wind farms were Offshore. Elexon responded that previously, wind farms did not realise the requirement for LV metering. In the case of Triton Knoll Offshore Wind Farm, they did not know they needed to install LV metering between their own assets and the OFTO assets, in the contingency operation, or apply for a Metering Dispensation. They should have installed meters to assign volumes correctly for transmission losses on OFTO assets during contingency operation. Although these losses were attributed to the generator, the fact remains that they should have installed the required LV metering.

4.4 The SVG Member stated that the SVG should not be in a position to make a decision on whether the wind farm should fit Metering Equipment that would cost £500,000 for small volumes of flows. The SVG should have been involved earlier in the process to ensure appropriate Metering Equipment is in place. Elexon responded that the issue of LV metering on Offshore and onshore substations is now listed on the Change Register for Elexon to raise as an Issue for industry to discuss. The SVG Member believed that the requirements need to be changed to avoid these issues in future. Elexon agreed with the SVG Member and stated that an Issue Group will be created.

4.5 An SVG Member agreed with the views expressed by the other SVG Member. They observed that, simply put, wind farms ask for forgiveness, rather than permission.

ACTION 236/03: SVG Chair to push the issue of LV metering in substations up the priority list to minimise issues encountered by the SVG.

4.6 The SVG Member added that the SVG don't have much option as they could not ask the Party to spend £500,000 for a small energy volume per year. They noted that only two Metering Dispensation Review Group members could comment on the application, asked whether there was a deciding vote at the MDRG or if this was the SVG's decision. Elexon responded that the MDRG is an expert group and only provides comments and recommendations and the SVG make the decision. Elexon added that volumes were being recorded, addressing the accuracy concern.

4.7 An SVG Member asked why LV metering would be a requirement if there was no accuracy issue. Elexon responded the wind farm has an unusual design as they have installed auxiliary transformer below their CoP1 Meters. Elexon added that when a wind farm applies for a connection to National Grid, they are reminded to ensure their metering complies with the relevant CoP.

4.8 The Panel Sponsor asked for the metering guidance available for Offshore wind farms. The guidance needs to be available so that wind farms can access them at the right time. Elexon responded in 2014 they had asked Ofgem to include a link to Elexon's guidance on their website and also circulated the guidance to Renewable UK so it could share it with its members.

4.9 An SVG Member stated that the Metering Dispensation issue needs to be addressed before it seriously impacts Settlement. The Chair asked Elexon if this was the route of the Issue Group. An SVG Member added that Elexon should be more proactive in conveying expectations to wind farm developers and highlighting that the SVG's purpose is not approve a Metering Dispensation after the event takes place. Elexon responded the Issue Group could discuss modifying Section L or CoPs to qualify reasons for Metering Dispensation applications.

4.10 An SVG Member asked if Metering Dispensation issues could be included in the approved CoP review (SVG236/02). Elexon responded this was the case but the CoP review was not aiming to raise BSC Modifications.

4.11 Elexon stated that the earliest stage they are made aware of wind farms is when they are added to National Grid's Technical Entry Capacity (TEC) Register.

ACTION 236/04: Elexon to liaise with the BM Unit team to discuss how to address Metering Dispensation issues introduced by wind farms.

4.12 The SVG:

a) **APPROVED** Metering Dispensation D/507, for Triton Knoll Offshore Wind Farm, on a lifetime basis.

5. CP1536 'Use of DTC data flow D0379 for submission of unmetered Half Hourly data' Assessment Report – (SVG236/04)

5.1 Elexon presented the Change Proposal (CP) Assessment Report for CP1536. The SVG considered the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1536.

5.2 An SVG Member observed that from the responses, CP1536 would not be a significant development for Half Hourly Data Collectors (HHDCs).

5.3 An SVG Member stated that if the CP1536 would result in Meter Administrators (MAs) using the DTN, Suppliers should also be able to appoint MAs via the DTN. Elexon responded that as part of Market-wide Half Hourly Settlement (MHHS), Elexon is looking to use a new registrations for MA appointments. Elexon added

that if enabling MA appointments via the DTN was viewed as a valid Change, a Market Participant would need to raise a separate Change Proposal to progress it.

- 5.4 Elexon stated that the corresponding DTC Change has been approved.
- 5.5 Elexon stated that at their last meeting, the MRASCo Development Board (MDB) approved the CP. However, the MDB could change their determination, depending on the SVG discussion.
- 5.6 The SVG:
 - a) **APPROVED** the proposed changes to BSCP520 for CP1536; and
 - b) **APPROVED** CP1536 for implementation on 25 February 2021 as part of the scheduled February 2021 BSC Release.

6. CP1530 'Introduction of a formalised process for the validation of measurement transformer ratios by Elexon' Assessment Report – (SVG236/05)

- 6.1 Elexon presented the CP Assessment Report for CP1530 with an updated solution to capture any comments or questions from SVG Members, before the CP is re-issued for a second consultation.
- 6.2 An SVG Member asked if the CP also captured the scenario where an outgoing MOA sends an invalid ratio. Elexon responded that the CP included flows sent by both MOAs and LDSOs. If an MOA receives a correct ratio that is missing from the current valid list then they should inform the LDSO and Elexon. This will mean the ratio that has been sent can be investigated by the LDSO to confirm whether that ratio is correct. Informing Elexon allows us to work with LDSOs to try and get a resolution to the problem. Elexon notes that the current process does not cover the scenario where an MOA, or LDSO, receives an invalid ratio from another outgoing MOA. Elexon notes that redlining to redlining to BSCP514 and BSCP515 was been updated to reflect this comment and states that MOA or LDSO should sender of the flow to confirm whether the ratios is correct. An SVG Member stated they received Elexon's response to their CP1530 queries raised after the September SVG meeting. The SVG Member stated that the response related to their query on processing updates to and publication of the transformer ratios list. They believe that changes to the list should be managed under the MDD change process and that the DTC should also refer to MDD. The SVG Member did not see the value in issuing a second Consultation in the CP's current form. Elexon responded that many consultation respondents supported the principle behind the CP. Elexon added that publishing the list on MDD would cause a delay in the release of changes and in Parties' sending of the relevant flows.
- 6.3 Elexon highlighted that although updates to the list would not be frequent and there is value in immediate updates. An SVG Member stated that immediate changes would not be required as DNOs should know in advance when they will use new ratios.
- 6.4 Elexon stated that the options available are for the SVG to agree to proceed to another consultation, provide a set of amendments to be made by 12 October 2020 for the second consultation or reject the CP.
- 6.5 The DSO Representative agreed with an SVG Member that DNOs would know in advance of any new transformer ratios. They added that endeavours need to be made to install any ratios for customer as DNOs do not have control of this. Allowing for some flexibility would be valuable.
- 6.6 An SVG Member asked how creating a list would improve data quality. Elexon responded that CP1530 is has been framed to prevent erroneous ratios being used so it doesn't stop MOA and LDSOs using incorrect ratios. To that extent, the SVG should consider whether the CP would improve the current baseline. The SVG Member asked if the DTC had validation requirements for the list. Elexon responded that the DTC CP would refer to Elexon's website. Elexon acknowledged that there was no process to validate the file against the data on Elexon's website. However, the recipient would validate the flow.
- 6.7 An SVG Member asked how Elexon would ensure Parties adhere to the transformer list following implementation of CP1536. Elexon responded they are looking to use the Performance Assurance Techniques to provide assurance that the valid list that will established under CP1530 is correctly adopted by the relevant Parties. Another SVG Member therefore asked for the CP's purpose. The SVG Chair responded the CP creates Audit requirements.
- 6.8 An SVG Member stated they were generally supportive of the CP, as were MOAs. They added that although the CP is does not solve the all the issues associated with current inaccuracies with transformer ratios, it would introduce improvements.

- 6.9 An SVG Member stated that they would support a second consultation considering the support from Industry.
- 6.10 An SVG Member stated that Elexon should consider Industry's feedback and work with Market Participants to create a solution that brings material improvements from the baseline. An SVG Member commented they believe the negative feedback from the first consultation has been addressed in the CP's new form. Elexon responded they have already liaised with Market Participants and made amendments accordingly, and that a full data cleanse would not be required at this stage.
- 6.11 Elexon stated that the June 2021 implementation for the DTC CP was only a revised proposed date. MDB Members raised concerns on data cleanse required in REC implementation and CSS context.
- 6.12 The SVG Chair stated that if a second consultation is carried out, the CP would be presented to the SVG for approval in December 2020. An UMSUG Member stated that the red-lined texts and their purpose should be clarified before the consultation.

Action 236/05: SVG Members and UMSUG Member to provide feedback to Elexon by 8 October 2020 to amend the CP before the second consultation.

- 6.13 An SVG Member's feedback is that the CP should explicitly state that data will be Audit checked and that files need to be validated using data on the Elexon Portal.
- 6.14 The SVG:
- a) **AGREED** CP1530 be re-issued for consultation, subject to feedback from SVG members and external parties being included in the consultation; and
 - b) **PROVIDED** comments or additional questions for inclusion in the CP Consultation.

7. **CPC Timetable 2020-2021 – (SVG236/06)**

- 7.1 At the September SVG meeting, the committee noted the ISG and SVG meeting dates for 2021. The annual CP Impact Assessment 'batch' timetable also follows a set cycle tied to the Panel Committee dates. The paper invited the SVG to note the CP Impact Assessment timetable for 2020-2021.
- 7.2 The SVG:
- a) **NOTED** the CP Impact Assessment timetable for 2020-2021.

8. **Allocating Rothienorman GSP to the North of Scotland (_P) GSP Group – (SVG236/07)**

- 8.1 The National Electricity Transmission System Operator (NETSO) has registered a new Grid Supply Point (GSP) at Rothienorman. The SVG, under delegated authority from the BSC Panel, must allocate this new GSP to a GSP Group. ELEXON recommended that the SVG allocates this GSP to the North of Scotland _P GSP Group.
- 8.2 The SVG:
- a) **APPROVED** the allocation of GSP ROTI3 to the North of Scotland (_P) GSP Group.

9. **Annual AFYC Recalculation and Review – (SVG236/08)**

- 9.1 This paper recommended that the Profiling Expert Group (PEG) act as a review group for this year's Average Fraction of Yearly Consumption (AFYC) recalculation. It invited the SVG to agree this along with the proposed timetable and calculation period.
- 9.2 The SVG:
- a) **AGREED** that the PEG acts as the AFYC Review Group;
 - b) **AGREED** the proposed timetable; and
 - c) **AGREED** the calculation period of 1 November 2019 to 31 October 2020.

10. **Conversion of Existing Metered Openreach Cabinets to Unmetered – (SVG236/09)**

- 10.1 This paper invited the SVG to reverse a previous SVG ruling that states existing Openreach metered cabinets must remain metered.

- 10.2 The DSO Representative stated that in their analysis of load profiles, the data between metered and unmetered sites are fairly similar. Unmetered Supplies (UMS) appear to produce similar and reasonable energy assessments. Although they would not disagree with Openreach's proposal to convert metered cabinets to unmetered, it may be a slightly regressive step from Industry's movement towards smart grids and the use of smart meters. The DSO Representative also asked if the SVG could set a precedent for other equipment owners to request conversion to UMS arrangements and whether the BSC would allow the conversion.
- 10.3 An SVG Member asked Openreach if the data presented to the SVG in December 2014 was accurate. Openreach responded stating that the data was derived from lab tests, rather than metered data. They added that the cabinet infrastructure increases and changes regularly, and that the Charge Code methodology approved by the SVG last month would make metered data irrelevant for future Charge Codes.
- 10.4 The DSO Representative stated they have compared data on UMS inventory and metered cabinets, and found that the two were fairly similar. As technology advances, in terms of the components within cabinets, it would be valuable to have a reference population to validate their UMS approach. Openreach asked where else this was reflected in UMS and stated it seemed unfair to have a ruling for one specific product for one specific customer.
- 10.5 Elexon stated they have set out the methodology that proved data accuracy was +/- 2% across Openreach's portfolio. Elexon added that the ruling only applied to Openreach and that new cabinet providers were able to request unmetered Charge Codes easily. The SVG Chair highlighted that the UMSUG was concerned in the disparity of treatment between Openreach and other companies.
- 10.6 Openreach left the SVG meeting.
- 10.7 The SVG:
- a) **DEFERRED** the conversion of existing metered Openreach cabinets to unmetered, until Elexon receives legal guidance on whether or not the conversion of cabinets from metered to unmetered is allowed.

OPEN SESSION – INFORMATION PAPERS

11. IDNOs calculating their own Site Specific Line Loss Factors

- 11.1 Elexon provided an update on the change in the Line Loss Factor (LLF) Audit process for IDNOs that do not mirror a Host DNOs's LLFs and the proposed timetable to accommodate the changes.
- 11.2 An SVG Member asked if a CP will be presented to the SVG next month. The SVG Vice Chair responded the long term plan to address IDNOs that do not mirror needs to be investigated further. As such, Elexon will not present a CP for this in the November 2020 meeting. The SVG Member responded that an appropriate derogation should be in place by the next Audit, if needed.
- 11.3 Elexon stated this was the first instance where an IDNO will calculate their own site-specific LLFs. The SVG Member stated that if the CP is not progressed in time, the SVG may need to approve the method for next year's submissions.
- 11.4 The SVG:
- a) **NOTED** the change in the LLF Audit process – for IDNOs (that do not mirror); and
 - b) **NOTED** the proposed timetable in order to accommodate changes.

OPEN SESSION – TABLED ITEMS

12. BSC Operations Headline Report

- 12.1 The SVG:
- a) **NOTED** the report.

13. Change Report

- 13.1 The SVG:
- a) **NOTED** the report.

OPEN SESSION – OTHER BUSINESS

14. Actions

- 14.1 The SVG Chairman confirmed the new actions raised in this meeting.

15. Minutes from Previous Meeting

- 15.1 The SVG agreed the minutes from the previous meeting without comment.

16. Matters Arising

- 16.1 An SVG Member asked whether Elexon was aware of the Shetland transmission project.

ACTION 236/08: SVG Vice Chair to liaise with the BMU Registration team to discuss their progress on the Shetland transmission project.

- 16.2 An SVG Member asked for an update on the Panel referral of the exempt supply application.

ACTION236/09: SVG Chair to circulate an update on the Panel referral of the exempt supply application to the SVG.

17. Next Meeting

- 17.1 The next SVG meeting will be held on 3 November 2020.