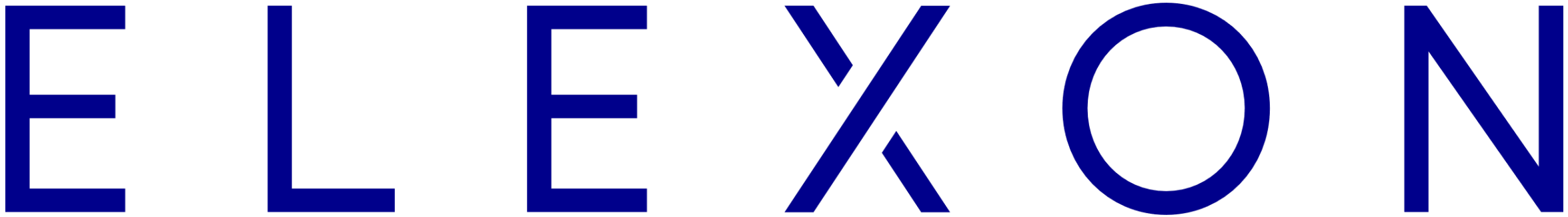

# SUPPLIER VOLUME ALLOCATION GROUP (SVG)

SVG 242

6 April 2021

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**Apologies**

Oli Meggitt

6 April 2021

# PART I

# PUBLIC SESSION

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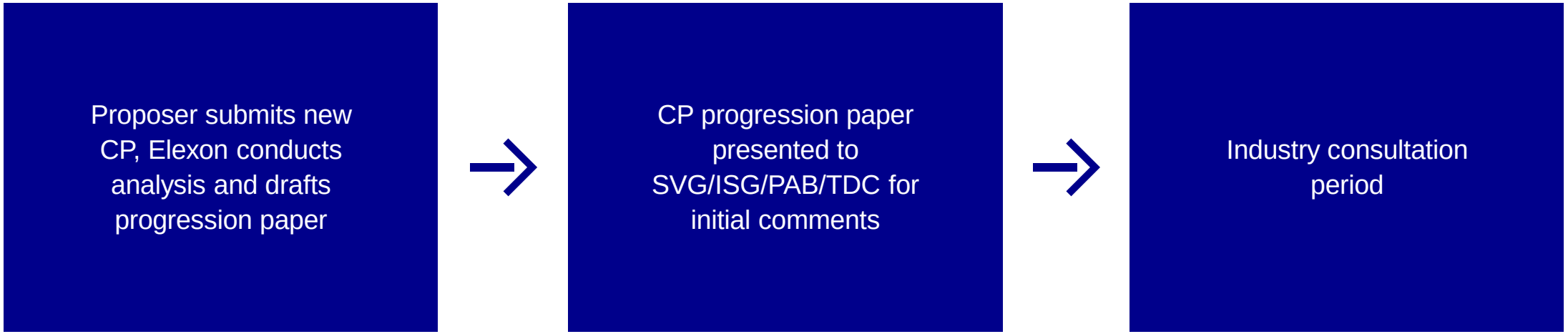
# Update to the CP process – CP progression paper stage

Elliott Harper

6 April 2021

# Update to the CP process – CP progression paper stage

~~CP raised~~ → CP raised




- The CP progression paper stage is additional to the defined BSCP40 CP process and gives committees a chance to provide initial comments on newly raised CPs
- However, as CPs are raised before the progression paper is presented, there is little time to assess significant comments, address any concerns, or amend the solution before it must be submitted for industry consultation the following week (for ISG/SVG)
- Raising the CP following the CP progression paper will enable the Proposer to consider committee initial comments in advance of raising the CP
- If significant comments are raised, there would be two options:
    1. Proposer considers comments and raises CP for industry consultation period; or
    2. Proposer consider comments and Elexon returns to following committee meeting to provide an update, following which CP is raised
- The Proposer shall retain ownership of the CP and solution in line with existing BSC Change governance principles
- This process shall act as a control to assure the integrity of solutions submitted for industry consultation

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**New CP – ‘HHDC Use of D0051’**
**Progression Paper**
**SVG242/04**

Andrew Grace

6 April 2021

## Issue

- There is currently no prescribed mechanism for HHDCs to inform a Supplier, via a dataflow, how they retrieve consumption data
- This process currently relies on bilateral discussions between HHDCs and Suppliers rather than a consistent Industry process
- Although not prescribed in BSCP502 some HHDCs will send a D0051 as part of the appointment process currently, but it is not an existing requirement for all to do this
- Without receipt of a D0051, Suppliers are reliant on informal methods of communication to understand if a Meter can be dialed remotely or not

# Proposed Solution

- Update the below BSCP502 Clauses to require HHDCs to send a D0051 flow in response to a D0155.
    - 3.2.1.4
    - 3.2.3.3
    - 3.2.4.6
    - 3.2.7.7
    - 3.3.1.3
    - 3.3.11.2
    - 3.3.12.2



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# Impacts and Implementation

## Impacts

- The CP will impact:
    - Suppliers
    - HHDCs

- Elexon – Document only change
- Industry – Process and/or system change

## Implementation

- The CP is proposed to be implemented on 4 November 2021 as part of the November 2021 BSC Release

# Proposed Timetable

| Event | Date |
|---|---|
| CP Progression Paper presented to SVG for information | 6 April 2021 |
| Formally Raise CP | 7 April 2021 |
| CP Consultation | 12 April 2021 – 10 May 2021 |
| CP Assessment Report presented to SVG for decision | 1 June 2021 |
| Proposed Implementation Date | 4 November 2021 (November 2021 Release) |



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## Recommendations

We invite the SVG to:

**a)** **NOTE** the proposed progression timetable for the CP; and

**b)** **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

# CP1539 Assessment Report

## SVG242/08

Nicholas Brocklesby

6 April 2021

## Issue and Proposed Solution

- Currently the LCCC may be unaware that a Metering Dispensation application has been made.
- Metering Dispensations granted to generation sites could conflict with the terms of a Contract for Difference (CfD). If the LCCC is unaware that a Metering Dispensation has been granted, they may conclude that a site has breached the terms of its CfD when carrying out an audit.
- If the LCCC is made aware of Metering Dispensations before they are awarded, then the Applicant and the LCCC can work to resolve issues with which may affect a CfD before they occur.
- Under the CP1539 solution, the LCCC will only be made aware that a Metering Dispensation application has been made. The change will not grant any right to consult on Metering Dispensation applications to the LCCC.
- The responsibility to inform the LCCC of Metering Dispensation applications lies with the Applicant. There will be no ongoing costs or additional workload on Elexon as a result of the CP1539 solution.
- By explicitly requiring Applicants to inform the LCCC before submitting a Metering Dispensation application, we reduce the risk that LCCC are unaware of the application compared to existing requirements to inform them.

## Consultation Responses

- There was one response to the CP1539 consultation disagreeing with the solution.
- It is more appropriate to make a requirement under EMR as this is a change that affects the LCCC. This change relates to Metering Dispensation applications made under the BSC, meaning that the process is governed by the BSC.
- This is also a simple change, with no ongoing costs or workload to Elexon.
- This change provides a benefit to Parties by reducing risk that a Metering Dispensation might cause a breach in the terms of a CfD.
- It is not clear how the ISG or SVG would consider representations made by the LCCC. The CP1539 solution does not provide the LCCC with means to make representations on Metering Dispensation applications.

## Recommendations

We invite the SVG to:

**a)** **APPROVE** the proposed changes to BSCP32 for CP1539;

**b)** **APPROVE** CP1539 for implementation on 24 June 2021 as part of the scheduled June 2021 BSC Release; and

**c)** **NOTE** that CP1539 will also be presented for decision to the ISG on 6 April 2021.

# MDD Change Requests for Version 310

## SVG242/01

Freya Gardner

6 April 2021

## Recommendations

We invite the SVG to:

**a)** **APPROVE** six General Change Requests for implementation in MDD 310 with a go-live date of 21 April 2021; and

**b)** **NOTE** 18 Fast Track Change Requests for implementation in MDD 310 with a go-live date of 21 April 2021.

# Allocating New Grid Supply Points (GSPs) to a GSP Group – Barking Central SVG242/02

Dnieper Cruz

6 April 2021

## Recommendations

We invite the SVG to:

**a)** **APPROVE** the allocation of GSP BARKR_A to the Eastern (_A) GSP Group;

**b)** **APPROVE** the allocation of GSP BARKR_C to the London (_C) GSP Group; and

**c)** **APPROVE** the removal of GSP BARKC1 from the London (_C) GSP Group.

# Update on TCR Testing

## SVG242/07

Sarah Ross

6 April 2021

# Central System Testing




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## Central System Testing

- Purpose: To provide assurance that Central Systems can cope with the increased volumes in MDD and LLFCs as a result of the Ofgem TCR

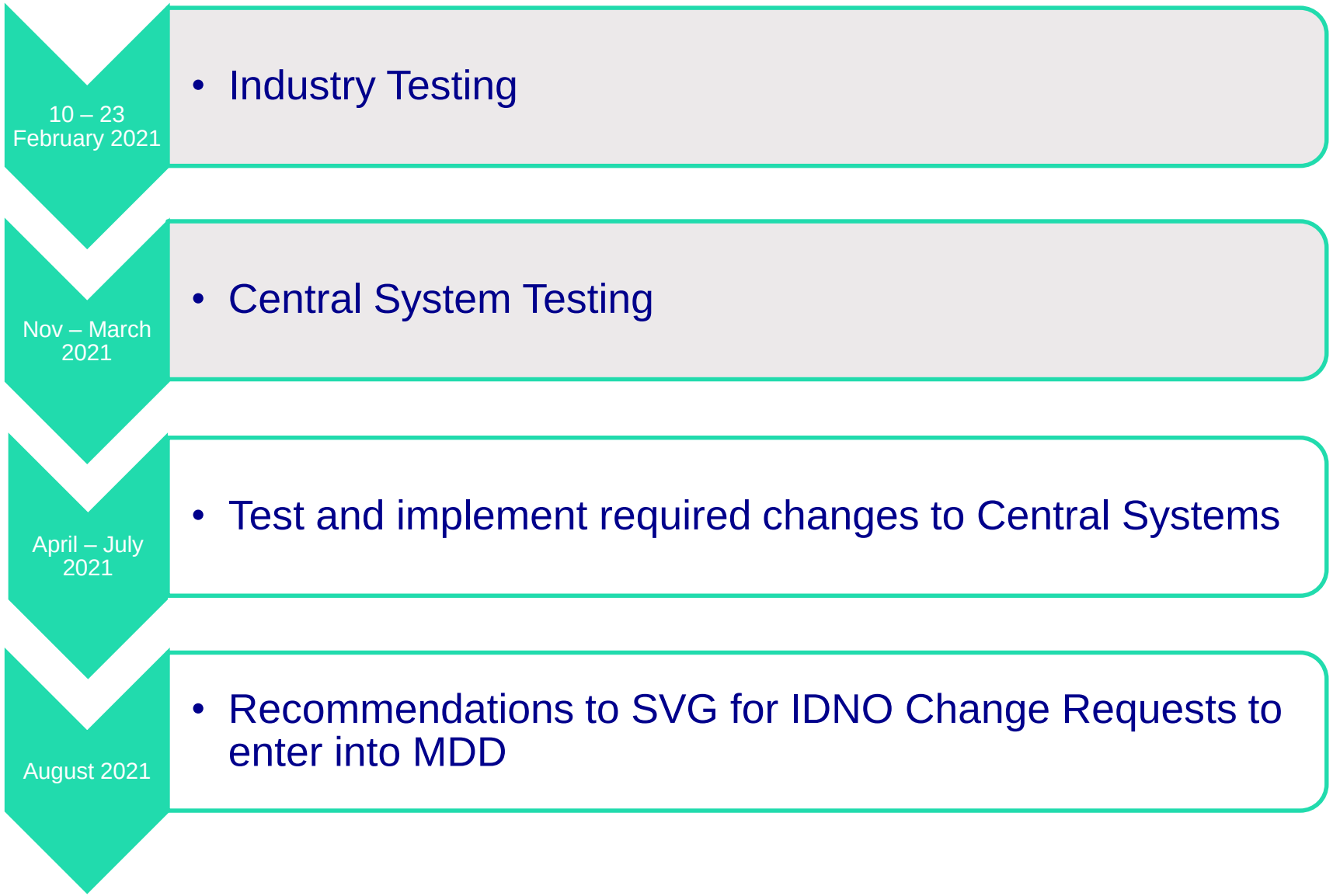
- Scope: Two Phases of Testing (Cycle 1 – increase by approx. 35k LLFC and combinations & Cycle 2 – increase by approx. 54k LLFC and combinations) covering the following areas;

    - MDD
    - Legacy SVAA (including Running the Volume Allocation Run)
    - Pool Application
    - Data Marshalling
    - BSC Portal

# Central system testing

| Central System | Observations | Recommendations |
|---|---|---|
| MDD & Legacy SVAA | High disk space usage.<br>Disk space utilisation reached its maximum limit resulting in D0265 failing to load files into SVAA DB. | Increase disk space available for MDD & SVAA file system and tablespaces in Production and test environments. |
| Legacy SVAA | Insufficient system memory.<br>D0030 processing ran out of memory as a result of which the D0314 files were not produced. | Implement a new module with optimised code for D0030 file processing to generate the D0314.<br>2. Increase system memory available |
| | D0030 Supplier and distributor reports (IRPDUS & IRPDU2) generation time increased substantially | Code changes and DB performance tuning. |
| | D0041 The duration of the NHH D0041 increased substantially and the throughput of the loader was reduced. | The increase in duration could indicate a performance problem and should be investigated to check if the performance can be improved. |
| Pool Application | Weekly report P0214001 generation time increased substantially. | Code changes and DB performance tuning. |
| | Monthly report P0145002 generation time increased by about 45% which added about 1.75 hours to the duration. | The increase in duration could indicate a performance problem and should be investigated to check if the performance can be improved. |
| DCP | Insufficient system memory and CPU for DCP Microservices.<br>DCP D0265 file loading completed after increasing system resources allocation and manual intervention to progress testing however processing time increased substantially. | Increase system resource allocation for DCP processes.<br>2. Configuration change to reduce the number of files processed simultaneously.<br>3. Code change (data loader & Web API) to attempt to improve processing times. |

# Elexon update for TCR implementation



# Elexon update for TCR implementation

| | |
|---|---|
| 10 – 23 February 2021 | • Industry Testing |
| Nov – March 2021 | • Central System Testing |
| April – July 2021 | • Test and implement required changes to Central Systems |
| August 2021 | • Recommendations to SVG for IDNO Change Requests to enter into MDD |

# Recommendations

We invite the SVG to:

**a) NOTE** the update

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# Protocol Approval – BT Plc (BTUK)

## SVG242/05

Mike Smith

6 April 2021

# Protocol Approval – BT Plc Elster A1700 and A1140 application

- In October 2020 Elexon received a protocol approval application from BT Plc, in the role of an HHDC, for the following integral Outstation Meter types/Meter:
    - Elster A1700
    - Elster A1140

- Following successful protocol testing in February 2021, we issued BT Plc with Certificates of Protocol Approval for the Elster A1700 and A1140, using their data collection software, BTUK Meter Data Collection System in March 2021.

## Recommendation

We invite the SVG to:

**a)** **NOTE** we issued BT PLC with Certificates of Protocol Approval for the Elster A1700 and A1140;

**b)** **NOTE** we updated the ‘CoP Compliance and Protocol Approval’ list to include these protocol approvals; and

**c)** **NOTE** we issued Newscast articles notifying BSC Parties and BSC Party Agents of the protocol approvals.

# Compliance Testing and Protocol Approval of the EM-Lite EMA1 meter SVG242/06

Mike Smith

6 April 2021

# Compliance Testing – The EM-Lite EMA1 (integral Outstation) Meter type

- All new Meter and Outstation types (including Meters with integral Outstations) need to undergo Compliance Testing (BSCP601)

- In July 2019 EM-Lite Ltd (EM-Lite) applied for Compliance Testing of its EMA1 Meter type - against CoP10 Issue 2

- Compliance Testing took place between July and October 2019 (with Meter firmware version v3.02-7 and software version v3.20-4).

- In December 2019, after successful testing, we issued a Certificate of Compliance to EM-Lite for the EMA1 Meter type (with firmware version v3.02-7 and software version v3.20-4).

- In October 2020, EM-Lite notified us of an amendment to the approved firmware and confirmed:
  - The amended firmware (version v3.03-2) did not impact previously approved Settlement functionality; and
  - The metrology (in software version v3.20-4), was not impacted either.

- As a result, we issued another Certificate of Compliance to EM-Lite for the EMA1 Meter type, using firmware version v3.03-2 and software version v3.20-4.

- For the purpose of updating the CoP Compliance and Protocol Approval list (and Valid Outstation Type .csv file), EM-Lite confirmed that:
  - It would like to use ‘EM1’ for the J0471 ‘Outstation Type’; and
  - The value for the J0432 ‘Pulse Multiplier’ for the EMA1 Meter type can only be ‘1’.

# Protocol Approval - EMA1 (integral Outstation) Meter type with TMA Data Management Ltd

- The Half Hourly CoPs require Outstation data to be to a format and protocol approved by the BSC Panel (BSCP601).

- In February 2021, TMA Data Management Ltd (TMA), an HHDC, applied for Protocol Approval of the EMA1 Meter type - on behalf of the following HHDC Market Participant IDs (MPIDs):
  - UDMS;
  - BMET; and
  - ACCU.

- TMA implemented the EMA1 Meter type's protocol into its data collection software, MDR (v3.4)

- On 19 March 2021, we witnessed the successful Protocol Approval testing and, after reviewing the test report, we issued a Certificate of Protocol Approval to TMA covering the MPIDs listed.

## Updates and notifications

We've:

- Published an updated version of the 'CoP Compliance and Protocol Approval' list to include:
  - the EMA1 Meter type; and
  - the Protocol Approval for the EMA1 Meter type, for TMA, covering all three HHDC MPIDs;

- Published an updated version of the 'Valid Outstation Types' list with 'EM1' for the EMA1 Meter type; and

- Issued Newscast articles notifying BSC Parties and BSC Party Agents of the successful Compliance Testing and Protocol Approval for the EMA1 Meter type.

## Recommendations

We invite the SVG to:

**a)** **NOTE** we have issued a Certificate of Compliance to EM-Lite Ltd for its EMA1 (integral Outstation) Meter type, against Code of Practice 10 Issue 2; and

**b)** **NOTE** we have issued a Certificate of Protocol Approval to TMA Data Management Ltd, a Half Hourly Data Collector, for the EMA1 (integral Outstation) Meter type, covering Market Participant IDs UDMS, BMET and ACCU.

# Consumers being able to return to NHH settled after migration under P272

Gavin Anderson

6 April 2021

# Background

BSC Modification P272 ('Mandatory Half Hourly Settlement for Profile Classes 5-8') was implemented on 1 April 2017 and requires that Metering Systems meeting the definition of Profile Class (PC) 5-8 who have an Advanced Meter fitted as a result of Supply Licence Condition (SLC) 12.18, must be settled using Half Hourly data.

Since the introduction of P272 Elexon has been approached a number of times (by Suppliers and others) asking whether it is possible to reverse a migration carried out under P272.

The response provided to date has suggested that once migrated, it is not possible to revert back from being settled HH to NHH in PC3- 4.

Following further questions and concerns raised in response to the MWHHS consultation Elexon has re-examined the relevant rules and sought legal advice as to whether the current stance should be revised. In particular considering two questions:

1. **Which new connections are required to be settled Half Hourly?**

2. **Is it correct to state that customers cannot, under any circumstances, change from being settled HH to NHH under PC3-4?**

# Interpretation

| Key Points | Interpretation |
|---|---|
| Definition of Advanced Meter | • Defined by P272 as Metering Equipment installed in accordance with SLC 12.18.<br>• The term 'Advanced Meter' is used to link the obligations in SLC and BSC. |
| Application of SLC12.18 | • 12.18 applies where the metering point falls within profile class 5, 6, 7 or 8 as defined in the Balancing and Settlement Code.<br>• There is only an obligation to settle HH where the Supply Licence mandates the use of an Advanced Meter. |
| BSCP516 – When can a customer be settled NHH | • A Non-Domestic customer could request that a new connection be settled NHH in PC3-4 if<br>  • The supplier is willing to, and<br>  • The LDSO does not require Maximum Demand to be recorded. |
| Text of P272 Final Modification report | • The Final Mod report suggests it is possible to revert a site to NHH if it was validly reclassified as being within PC3-4.<br>• Text within BSCP516 was intended to 'avoid doubt' but actually goes further than the legal text of P272 (3.3.9) .<br>• The BSC is clear that in the event of a conflict between the Code and a BSCP, the code takes president (H1.5.1).<br>• The P272 mandate is reliant on the SLC, not on the installation of an Advanced Meter. |
| BSC L 2.2.2 (P272 legal text) | • The legal text states where an advanced meter is required it shall be Half Hourly Metering Equipment (i.e. settled Half Hourly). |

**Conclusions**

- Legal advice agreed that, if a consumer had agreement from the Supplier and LDSO that they did not require Maximum Demand at this new connection, the Supplier could allocate the Metering System to Profile Class 3 or 4 and settle it Non Half Hourly.

- Elexon legal team agree that reverting to NHH should be possible under the P272 legal text. Where a customer has had an advanced meter installed in accordance with SLC12.17-18, but the Metering System now meets the conditions for Profile Class 3 or 4 in BSCP516, the Supplier can revert the Metering System to NHH Settlement (in Profile Class 3 or 4).

# Next Steps

## Engagement

- Elexon has engaged with Ofgem who has requested to be kept updated with any actions taken. Ofgem did not disagree with the legal advice provided and suggested they will engage with relevant teams internally.
- A holding message has been shared with relevant teams within Elexon, which will be provided in response to any questions from parties on this subject, until next steps are clearly understood.

## Actions

- Elexon will continue to engage with Ofgem. Following an initial discussion Ofgem has requested details of the review undertaken and has indicated they intend to check this with their own legal team.
- As the legal advice suggests, a Change Proposal will be drafted to address the text within BSCP516, which goes beyond the requirements of the Code.

## Recommendations

- The SVG are invited to note the interpretation and associated legal advice.
- Views are invited from the SVG on any additional considerations or reactions to the information provided.

# PART III

# PUBLIC SESSION

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# Options for […] requests to consider supply as exempt for EMR purposes […] SVG242/03

Gavin Anderson

6 April 2021

# Background

- Licensed Suppliers are required by legislation to pay a number of charges on electricity they supply to premises in Great Britain, including the Renewables Obligation (RO), charges to fund Contracts for Difference (CFD) and Capacity Market (CM).
- The BSC Panel agreed (8 November 2018 - 284/07) to delegate to SVG the power to agree that SVA Metering Systems should be treated as recording exempt supply (and therefore should not be subject to EMR Charges).
- An application could relate to either:
  - An Import Metering System (with accompanying evidence that, under normal circumstances, the exempt supplier would always be generating enough electricity to meet the demand); or
  - An Export Metering System (with accompanying evidence that, under normal circumstances, the exempt supplier would have enough customers to use the generation).
- To date there has been two successful application to SVG, with a further three application being heard by the SVG in April.
- In December 2020 we agreed to examine whether improvements could be made to the interim SVG process to better facilitate applications.
- In addition, the Panel also requested that enduring solutions be investigated, to consider options to handle Metering Systems which are recording a mixture of exempt and licensed supply.
- The BEIS review of the exempt supply arrangements could change the policy and rules in this space, but for now we must support the existing arrangements.
- There are links to other areas of work, including P379 and Issue 88, but these will not remove the need for the SVG Interim Process.

# Development Option – Changes to the Interim Process

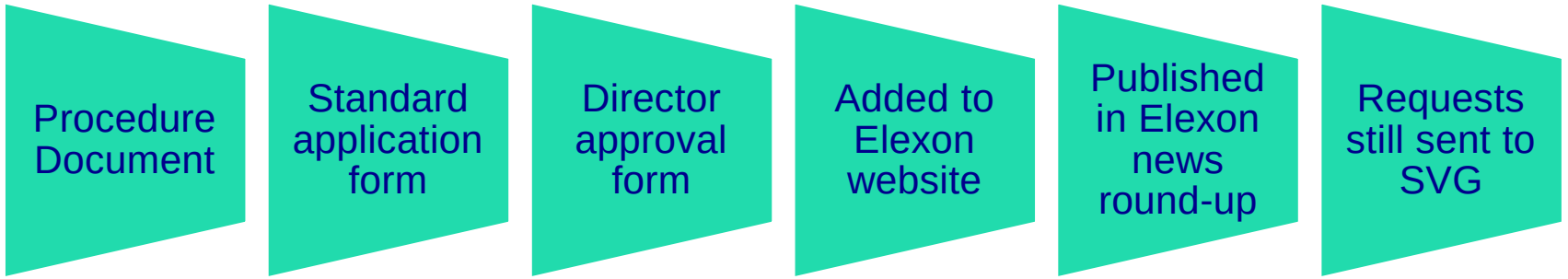
- The current interim process is limited due to the requirement to meet the ‘under all reasonable circumstances’ thershold
- An enduring solution is likely to require a CP or Modification, depending on the option progressed this may require code and/or IT development, which will need to be prioritised against other change.
- Evolving the current SVG application could be short term solution.

**Need to develop the interim process**

- The existing procedure is only set out within the papers and records of past SVG and Panel papers.
- If an applicant wanted to understand the process for making an application, they would have to search for the information in published papers, or contact Elexon. They are not able to ‘self serve’ at present.
- As there is no guidance or procedure the process relies on bi-lateral discussions between Elexon and the interested party.

**Proposal**

- Further develop the current position, including:



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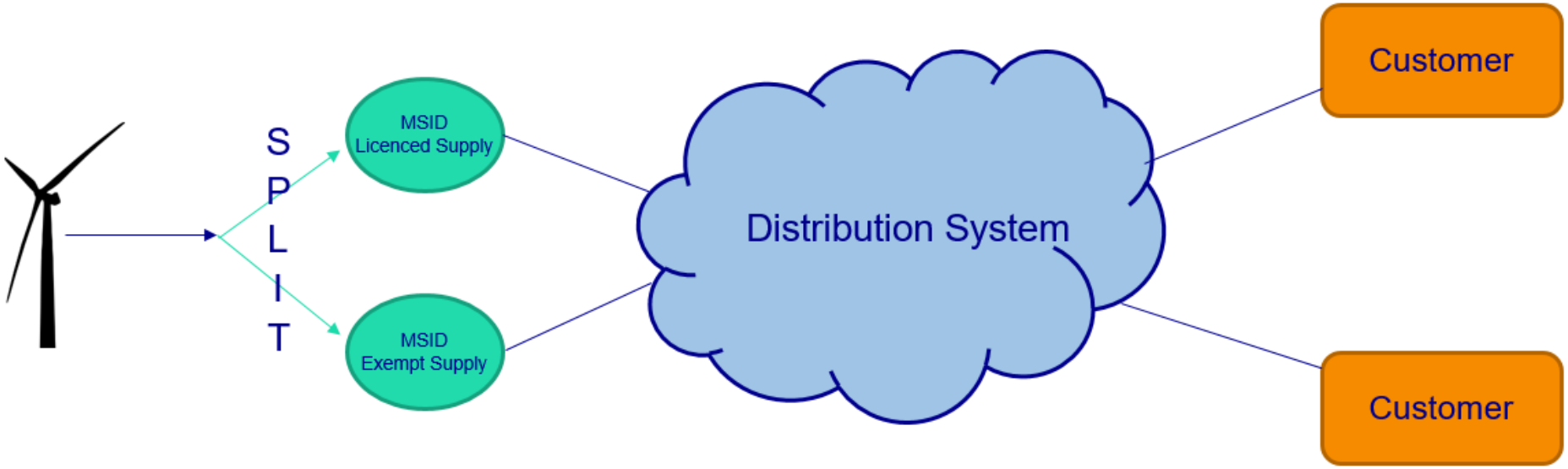
# Developing an enduring process

## Option 1 – Using Existing BSCP550 arrangements

- Suppliers to use the existing rules for Shared SVA Meter Arrangements under BSC Procedure BSCP550 to split metered data between multiple suppliers or supplier ID's.
- This option could be used now, without a need to raise a change, to split metered data between exempt and licenced supply.

Limitations:

- BSCP550 requires that the Allocation Schedule includes specific kWh values and is notified to HHDC before Gate Closure.
- Would not permit any ex post matching of Import and Export volumes.
- Only those Suppliers with access to multiple IDs would be able to use it.
- Increasing numbers of applications for new IDs, (to enable meter splitting under BSCP550). Could increase costs to industry parties and create a



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## Option 2 – Improvements to Shared SVA Meter Arrangements

Addresses the limitations of option 1

- Like Option 1 would include use of a Shared SVA Meter Arrangement. The Supplier provides their HHDC with an Allocation Schedule (ahead of Gate Closure) instructing them how to allocate the metered volumes.

Two variations possible:
- Option 2A (MOD): Amend the definition of Shared SVA Meter Arrangement, removing the need for an arrangement to involve two or more Suppliers.
- Option 2B (CP): Amend BSC Procedure BSCP550 to add a new type of Allocation Schedule (Similar to CP1369). The Supplier tells the HHDC which Export Metering Systems are providing power to which Import Metering Systems without specifying kWh values until the HHDC collects the metered data ex post.

- Option 2A could be raised by Panel as it would better facilitate the achievement of relevant BSC Objective (d).
- Option 2B could be implemented as a Change Proposal, or could be delivered as part of the same Modification as Option 2A.

Limitations:
- Option 2 could provide significant flexibility, but it would still require the supplier to provide an Allocation Schedule in advance, for the HHDC to carry out matching.
- It would not allow the matching process to be carried out by a third party (other than the HHDC).

# Developing an enduring process

## Option 3 – Modification to allow matching carried out ex-post by a third party

- Allows a third party to be involved ex post in splitting metered volumes into exempt and licensed supply.
- Could enable a peer-to-peer trading platform to match customers and exempt suppliers ex post based on data retrieved from meters.
- The third party would not need to become a Qualified HHDC.
- Flexibility could be welcomed by industry

Limitations

- Appropriate assurance requirements would be required
- Potential risks to Settlement if the third party was using different metered data (actual or estimated) to that submitted into Settlement by the HHDC
- No clear route for the third party to submit data into Settlement (e.g. through the HHDC, or directly to SVAA)

## Recommendations

We invite the SVG to:

**a)** **AGREE** that Elexon should develop a more formal and structured process for applications to the interim process (section 5.5);

**b)** **AGREE** that the guidance on the process should explain the possible use of Shared SVA Meter Arrangements (Option 1);

**c)** **AGREE** that Elexon should recommend to the BSC Panel that they raise a Modification Proposal to implement Options 2A and 2B;

**d)** **NOTE** that Option 3 would provide Suppliers with more choice on who performs ex post matching of Import and Export, and could be raised by any BSC Party as a Modification Proposal;

**e)** **AGREE** that if an application is made by an organisation and the customer changes Supplier, the application should continue to be 'active' (section 7.3); and

**f)** **AGREE** that the development of the Interim Process should include the establishment of rules to underpin the maintenance and duration of any application that is approved (section 7.5).

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# BSC Operations Headline Report

6 April 2021

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# BSC Change Report

6 April 2021

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**Actions**

Paige Binet / Oli Meggitt

6 April 2021

ELEXON

**Panel Update**

Tom Edwards

6 April 2021

ELEXON

**Minutes from previous meeting**

Paige Binet / Oli Meggitt

6 April 2021

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# Any other business

6 April 2021

# NEXT MEETING:

# TUESDAY 4 MAY

ELEXON