CP Assessment Report

CP1545 'Introducing Technical Assurance of Metering (TAM) Central Volume Allocation (CVA) Specific Sample audits'

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1545 which Elexon will present to the SVG at its meeting on 3 August 2021 and the ISG at its meeting on 3 August 2021. The Committees will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1545.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the ISG and SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the CP Proposal Form
- Attachment B contains the proposed redlined changes to deliver the CP1545 solution.
- Attachment C contains the full responses received to the CP Consultation.

ELEXON

Committee

Imbalance Settlement Group (ISG)
Supplier Volume Allocation Group

Recommendation

Approve

Implementation Date

4 November 2021 (November 2021 BSC Release)

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SVG246/04

CP1545
CP Assessment Report

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1 Summary

Why change?

Elexon is currently only able to conduct Specific Sample Audits on Supplier Volume Allocation (SVA) sites, which limits our ability to assure the integrity of Settlement across Central Volume Allocation (CVA) sites.

The Technical Assurance of Metering (TAM) Performance Assurance Technique (PAT) monitors compliance of Metering Systems against requirements in the BSC and its subsidiary documents. It comprises of a combination of on-site Inspection Visits and remote Desktop Audits, on Half Hourly (HH) SVA and CVA Metering Systems.

The Performance Assurance Board (PAB) have the option to request a Specific Sample through the TAM, which focuses on an area of perceived risk to Settlement. However, we are currently only able to undertake a Specific Sample on SVA Metering Systems, which limits our ability to provide targeted Assurance on CVA Metering Systems.

Solution

Removal of the 'SVA only' clause from 'BSCP27 Technical Assurance of Half Hourly Metering Systems for Settlement Purposes'. In place, wording will be amended to 'CVA and SVA' to make clear that Specific Samples under the TAM technique can be a mix of both CVA and SVA sites.

Impacts and costs

CP1545 is expected to impact CVA Registrants, Central Data Collection Agents (CDCA), the Technical Assurance Agent (TAA), Distribution System Operators (DSO) and Meter Operator Agents (MOA).

Elexon currently has a workaround in place to complete these audits. As such there is no increase on current activities, and thus CP1545 is not expected to incur any increased costs to industry.

The cost of amending the impacted BSC documents is expected to be <£1k.

Recommendation

CP1545 is recommended for approval and implementation on 4 November 2021 as part of the standard November 2021 BSC Release.

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2 Why Change?

What is the issue?

The TAM PAT monitors compliance of Metering Systems against requirements in the BSC and its subsidiary documents. It comprises of a combination of on-site Inspection Visits and remote Desktop Audits, on HH SVA and CVA Metering Systems.

The PAB have the option to request a Specific Sample through the TAM, which focuses on an area of perceived risk to Settlement. However, we are currently only able to undertake a Specific Sample on SVA Metering Systems, which limits our ability to provide targeted Assurance on CVA Metering Systems.

This lack of flexibility in the application of the TAM Audits on the CVA market was highlighted in December 2020 following the identification of Annual Demand Ratio (ADR) error at a Grid Supply Point (GSP) in GSP Group A. Elexon has developed a workaround to support ADR investigations. However, to assure the wider CVA market, we need an enduring solution that will allow us to have Specific Samples for all CVA sites.

Background

Technical Assurance of Metering Systems

The TAM is a detective technique which is part of the suite of techniques under the Performance Assurance Framework (PAF) to check the compliance of Metering Systems. The TAA performs an annual audit made up of individual Inspection Visits.

The annual audit consists of a combination of sampled and targeted Inspection Visits and Desktop Audits, to sites with Half Hourly Metering Systems registered in SVA and CVA.

The TAA is a BSC Agent commissioned and managed by Elexon. The TAA auditors are suitably qualified, trained and experienced to carry out Inspection Visits and have the appropriate authorisation throughout Great Britain. All TAA auditors carry copies of their authorisations to Inspection Visits.

The TAA will notify the relevant Registrant and the appointed agents of a Metering System that has been selected for audit at least 20 Working Days prior to the Inspection Visit date.

The Registrant is responsible for securing access to the site and Metering System that has been selected for audit. The Registrant should ensure that a suitably qualified MOA can attend.

For High Voltage sites and for Low Voltage sites with remote Current Transformers, the Registrant will also need to ensure that a Licensed Distribution System Operator (LDSO) engineer can attend.

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3 Solution

Proposed solution

Removal of the 'SVA only' clause from Sections 1.8, 1.9 of BSCP27 as well as CVA roles being added to Section 3.3, which will allow for the PAB to request Specific Samples to be performed on CVA Metering Systems. In place, wording will be amended to 'CVA and SVA' to make clear that Specific Samples under the TAM technique can be a mix of both CVA and SVA sites.

Proposer's rationale

The removal of the 'SVA only' clause in BSCP27 will allow the PAB greater flexibility in its application of detective Assurance measures to the CVA market. The removal of the 'SVA only' clause was endorsed by the PAB at its February 2021 meeting (recommendation in paper 'PAB241_05 TAM Audit Scope').

Furthermore, the CVA market is currently a focus for the PAB, as outlined in Elexon's Risk Operating Plan (ROP). As such, it is essential that the Technical Assurance Agent (TAA) is not hindered in its ability to perform site inspections at the PABs discretion.

Proposed redlining

The proposed redlining to BSCP27 for CP1545 can be found in Attachment B of this paper.

Further, we have made a number of housekeeping changes to BSCP27 as listed below:

- Copyright Disclaimer, Footer and section 4.1: Amended ELEXON to Elexon to align to updated Elexon branding.
- Section 1.2: Amended the shortened title of Technical Assurance to it's full title of Technical Assurance of Half Hourly Metering Systems for Settlement Purposes for clarity.
- Section 1.2: Updated numbering.
- Section 1.14: Corrected a spelling error.
- Section 3.6, 3.8A and 3.10: Updated number referencing within the table.
- Removal of double spaces throughout the document.

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4 Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact & costs
CDCA	Where the PAB has requested a CVA Specific Sample, fulfil obligations as outlined in BSCP27. Impacts and costs are expected to be negligible as CVA Metering Systems are subject to audits via a workaround already.
CVA Registrant	
DSO	
MOA	
NGESO	
TAA	

The one respondent to the CP1545 Consultation, representing a MOA, did not indicate any costs or impacts from implementing or operating CP1545.

Central impacts and costs

Central impacts

CP1545 requires changes to BSCP27 with a potential minor system change (as explained in the table below).

Central Impacts	
Document Impacts	System Impacts
• BSCP27	It is possible that that the TAA will have to update a table in the TAAMT system. This will not be possible until the completion of the TAAMT2 project (July 2021). However, any system updates will likely be minor, with costs covered through the assurance BAU operational budget.

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Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
Elexon expects a positive impact on Settlement Risk as CVA Specific Samples will allow the PAB greater flexibility in applying assurance measures against the following Risks: • 020 CVA Risk: Metering Equipment Installation and Commissioning; • 021 CVA Risk: Retrieval and Processing of Metered Data; • 022 CVA Risk: Metering system technical details are not created or notified correctly; • 023 CVA Risk: Fault resolution; and • 024 CVA Risk: Reference Data. It will also reduce administration effort for Elexon when having to put a work around in place.

Central costs

The central implementation costs for CP1545 will be approximately <£1k and are driven by amending BSCP27 and updating internal and external guidance.

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5 Implementation Approach

Recommended Implementation Date

CP1545 is recommended for implementation on 4 November 2021 as part of the standard November 2021 BSC Release.

This must be in place ahead of the next Performance Assurance Operating Period which commences in April 2022 to provide the PAB with the option of requesting a CVA Specific Sample in the TAM audit scope for 2022 onwards.

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6 Initial Committee Views

ISG's initial views

An ISG member enquired whether the workaround Elexon have in place for the 2021/22 Performance Assurance Operating Period (PAOP) was sufficient as a long term solution. Elexon responded that the work around makes use of Targeted Visits, which requires increased administration effort. It also does not deliver the same functionality and flexibility and as such, it is not efficient as a long term solution.

SVG's initial views

The SVG had no comments on the CP or the timetable for progression.

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7 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1545 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1545 proposed solution?	1	0	0	0
Do you agree that the draft redlining delivers the intent of CP1545?	1	0	0	0
Will CP1545 impact your organisation?	0	1	0	0
Will your organisation incur any costs in implementing CP1545?	0	1	0	0
Do you agree with the proposed implementation approach for CP1545?	1	0	0	0
Do you have any further comments on CP1545?	0	1	0	0

Comments on the proposed solution

The one respondent for this CP Consultation agreed with the proposed solution, redlining, implementation approach and offered no further comments.

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8 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP27 for CP1545; and
- **APPROVE** CP1545 for implementation on 4 November 2021 [as part of the November 2021 Release].
- **NOTE** that CP1545 will be presented for decision to the
    - SVG on 3 August 2021; and
    - ISG on 3 August 2021.

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
ADR	Annual Demand Ratio
BSC	Balancing and Settlement Code
CDCA	Central Data Collection Agents
CVA	Central Volume Allocation
DSO	Distribution System Operator
GSP	Grid Supply Point
HH	Half Hourly
ISG	Imbalance Settlement Group *(Committee)*
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agents
PAB	Performance Assurance Board
PAF	Performance Assurance Framework
PAOP	Performance Assurance Operating Period
PAT	Performance Assurance Technique
REC	Retail Energy Code
ROP	Risk Operating Plan
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group *(Committee)*
TAA	Technical Assurance Agent
TAM	Technical Assurance of Metering
TAAMT	Technical Assurance Agent Management Tool

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes'	https://www.elexon.co.uk/csd/bscp27-technical-assurance-of-half-hourly-metering-systems-for-settlement-purposes/
4	PAB241/05 TAM Audit Scope	https://www.elexon.co.uk/meeting/pab241/

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