

P391 CONSULTATION RESPONSES

MEETING NAME	Technical Assurance of Metering Expert Group
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Date of meeting	16 October 2019
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Owner/author	Michael Taylor
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Purpose of paper	Information
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Classification	Public
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Summary	At its September 2019 meeting, the BSC Panel approved modification P391 , which will introduce Desktop Audits to the Technical Assurance of Metering (TAM) audits. Following approval, P391 was distributed to industry for consultation.
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1. Introduction

- 1.1 The Performance Assurance Framework (PAF) review concluded that the Technical Assurance of Metering (TAM) Performance Assurance Technique (PAT) could be improved with the addition of Desktop Audits. Desktop Audits would allow for;
- The TAA to complete a greater number of audits in any Performance Assurance Operating Period (PAOP);
 - A reduction in the percentage of audits unable to be completed due to no site access; and
 - The ability to focus on Site Inspection Visits where it is more likely that a Settlement error has occurred.
- 1.2 The Report Phase Consultation, where industry members were invited to provide their views on the proposed modification, ran between the 16 and 27 September 2019. This paper provides a brief summary of the responses.

2. Views on Panel's recommendation to approve P391

- 2.1 All respondents agreed with the Panel's initial unanimous recommendation that P391 better facilitates BSC Objectives.
- 2.2 One respondent noted that they were aware of access issues in on-site auditing and the addition of Desktop Audits would allow the audit sample percentage to increase. Another respondent believed that Desktop Audits are an efficient way to provide further assurance as to the accuracy of Settlement.

3. Views on redlined changes to the BSC

- 3.1 Respondents unanimously agreed that the redlined changes to the BSC deliver the intention of P391.
- 3.2 One respondent agreed but suggested additional wording to make clear that both Meter Operator Agent (MOA) and Half Hourly Data Collector (HHDC) are able to provide relevant auditable information. ELEXON responded that the guidance note would be an appropriate location for listing responsibilities for data provision of this type.

4. Views on impacts to respondent's organisations

- 4.1 Respondents unanimously identified impacts on their organisation resulting from the requirement to support future Desktop Audits. As the eventual scope of the deployment of Desktop Audits is decided by the Performance Assurance Board's (PABs) audit scope and subject to change year-on-year, respondents felt that these impacts are unquantifiable at this time.

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- 4.2 Potential impacts were administrative, describing additional strain caused by provision and rectification of documents under potential future Desktop Audits.
- 4.3 Several respondents noted that any additional audits would require resources to manage and monitor. Changes to internal processes to support Desktop Audit requests and ensure that the necessary documents that audited BSC Parties should send to the TAA are described.

5. Views on costs incurred by respondent's organisations

- 5.1 Seven respondents identified potential costs associated with the supporting Desktop Audits, while two did not.
- 5.2 Two respondents noted that there would be increased costs and resource requirements should a Desktop Audit trigger an on-site inspection, but did not provide any indication of the magnitude of these costs as these were viewed as unquantifiable at this time.
- 5.3 Several respondents identified the impact that the need for training on the new process would incur. ELEXON has already provided one industry training day on the proposed Desktop Audits process. Further training sessions will be offered to BSC Parties prior to and following the start of the new audit year, running from April 2020 to April 2021.
- 5.4 One respondent noted that they accept reasonable costs as part of conforming to the audit process, and when contacted several others confirmed this view.

6. Summary

- 6.1 The primary concerns highlighted in the consultation response focused around ensuring that the additional resource constraints of audited parties did not outweigh the benefits of conducting Desktop Audits.
- 6.2 ELEXON proposed consulting the Technical Assurance of Metering Expert Group (TAMEG), to request its views on the consultation responses and to offer its opinion on the Desktop Audit scope for 2020/2021.

7. Recommendations

- 7.1 We invite you to:
 - a) **NOTE** the industry responses
 - b) **COMMENT** on Desktop Audit scope for 2020/2021

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