ELEXON

Minutes

MEETING NAME: TECHNICAL ASSURANCE OF METERING EXPERT GROUP (TAMEG)

Meeting number 46 Date of meeting 14 July 2021		Venue	Elexon – MS Teams
		Classification	Public
Attendees and Apologies			
Attendees			
Mike Smith	MS	TAMEG Cha	ir
Jessica Davis	JD	Technical Secretary	
Christopher Day	CD	Elexon	
Simon Waltho	SW	Elexon	
Lisa Young	LY	C&C (TAA)	
Colin Gentleman	CG	SSE (LDSO)	
Warren Lacey	WL	Northern Pov	vergrid (LDSO)
Antony Hobbs	AH	Industry Exp	ert
Tom Chevalier	тс	Association of Meter Operators	
Dawn Matthews	DM	UKPN (LDSO)	
Meg Wong	MW	Stark (HHDC	;)
Richard Brady	RB	WPD (LDSO)
Daniel Lewis	DL	EDF (MOA)	
Michael Messenger	MM	IMServ (HHD	DC)
Stuart Jackson	SJ	C&C (TAA)	
Kevin Walker.	KW	E.ON (MOA)	

Apologies				
Michael Taylor	MT	Elexon		
Dan Rynne	DR	IMServ (MOA)		
Andy Hume	AH	IMServ (MOA)		
Paul Gregory	PG	C&C (TAA)		
Jono Liddell	JL	Smartest Energy (Supplier)		
Peter Gray	PG	SSE (Supplier)		
Holly Mills	НМ	EDF (MOA)		

1. Introduction

1.1 The TAMEG Chair welcomed attendees to the meeting and noted those that had sent apologies.

2. TAA Annual Report

2.1 A TAMEG member asked if the failings, related to CVA Site Audits (as mitigation against the recent Annual Demand Ratio (ADR) issues), were on sites that had recently been Commissioned or if they were historic failings from the 1990s. The Technical Assurance Agent (TAA) noted that the sites were chosen because Elexon had raised concerns that the Grid Supply Points audited might be contributing to the ADR issues it was seeing. The TAA agreed to take an action to investigate and report back to TAMEG. The TAMEG member recalled some historic issues, related to National Grid sites, whereby a reorganisation meant historic documents were lost or missed, they highlighted that these non-compliances may relate to these historic errors.

ACTION 46.01

- 2.2 The TAA representative highlighted that the majority of sites from the Desktop Audit were post-P283¹. A TAMEG member asked did the Audit look at the point that the MSID (MPANs) became Measurement Class E², or at the point the MSID was first registered. Elexon confirmed that it was a combination of both because there was a requirement to Commission both types of sites (i.e. Non-Half Hourly or Half Hourly registered).
- 2.3 A TAMEG member noted that the Performance Assurance Board (PAB) required a report back from the TAMEG on the discussions about the TAA Annual Report and suggested a structured step through of it in order to get all views and opinions for the PAB. The Chair agreed that this would be of value and would structure the rest of the meeting accordingly.
- 2.4 A TAMEG member noted their agreement with some previous comments around the way the industry changed after 2014 and the introduction of P283. They also noted that the data flow <u>D0383</u>³ was not introduced until 2018 and did not capture all relevant information which is why the industry heavily relies on forms to be compliant with <u>Code of Practice Four</u>⁴ (CoP4). The TAMEG member highlighted that there was a struggle to get Commissioning documents for Measurement Class E sites between 2014 and 2018 and suggested that if there is a current transformer (CT) then the site should have been Commissioned. A TAMEG member suggested an industry-wide problem has been identified, i,e. when there are changes to the structure of organisations a lot of forms and information can be permanently lost.
- 2.5 A TAMEG member highlighted their concern around the impression that they were giving industry, as the audit had very low success rates. Industry could misinterpret them as indicating that only 17% of Metering Systems

¹ 'Reinforcing the Commissioning of Metering Equipment Processes'

² 'Half Hourly Metering Equipment at below 100kW Premises with current transformer'

³ 'Notification of Commissioning Information'

⁴ 'Code of Practice for the Calibration, Testing and Commissioning requirements of Metering Equipment for Settlement purposes'

were recording accurately but, solely looking at paperwork, this was unlikely to be a true reflection of the state of the Metering Systems themselves.

- 2.6 A TAMEG member noted their involvement with the CoP4 review, which intended to make paperwork less of a requirement. Following this TAA Annual Report, that highlights the state of the records being poor, it could be cause for concern when presented to PAB and to the wider market.
- 2.7 A TAMEG member noted the Category B failures reflect those issues in Measurement Class E and the difficulty of document sharing between Party Agents. They also highlighted invalid errors flagged when there is a disparity in the formatting of data submitted under the TAA for Desktop Audit process. They also questioned where the Settlement impact exists within all of these errors.
- 2.8 Elexon drew focus to the objectives of the TAA:
- to identify non-compliances, to assess the non-compliances against the BSC itself and relevant Code Subsidiary Documents (CSDs); and
- to give overall health of the market.
- 2.9 Elexon highlighted that materiality was not within that remit of the TAA but conclusions can be drawn, especially when on-site Inspection Visits start again (including those targeted ones, as a result of certain non-compliances found under the Desktop Audit (i.e. Post Desktop Audit Inspection Visits)).

3. TAA Annual Report – Response

3.1 Elexon presented their response to the TAA Annual Report with no further comments.

4. Annual Report Discussion

4.1 Incorrect Measurement Class Registration at Import and Export Sites

4.1.1 Elexon confirmed the rationale behind looking at both Import and Export Metering Systems was due to the TAA identifying cases that were not following the P339⁵ guidance that states that the Measurement Class refers to 'premises'. Therefore, the Export Metering System must be registered in the same Measurement Class as the Import Measurement Class. TAMEG agreed with Elexon that this did not heavily affect Settlement and therefore can be de-scoped from the Audit.

4.2 D02151 – Provision of Site Technical Details

4.2.1 A TAMEG member noted that they were raising an Issue Group, with the Issue form currently going through internal review. The next steps would then be to go out for external review. The TAMEG member welcomed other TAMEG members to review the draft Issue. This would be available before the end of the July 2021. Elexon took an action to circulate this to all TAMEG members, when it was complete.

ACTION 46.02

4.3 **Overall Accuracy**

- 4.3.1 TAMEG discussed if the responsibility to perform the Overall Accuracy calculation was with the MOA or the TAA. The consensus was that the MOA should have the capability of doing the calculation and that the TAA should check these calculations. There was some concern that some MOAs could not perform the calculations, even with a large amount of resources including Local Working Instructions (LWIs) and training.
- 4.3.2 A TAMEG member noted that there may be some value in knowing the breakdown between the records not being available and the failure to do the calculation. The TAA agreed to investigate.

ACTION 46.03

- 4.3.3 A TAMEG member highlighted that on a Low Voltage (LV) site, with a Class 0.5 CT and a Class 1 Meter, this is an automatic pass. On a High Voltage (HV) site, with a Class 1 Meter, a Class 0.5 CT and a Class 1.0 voltage transformer (VT), this is an automatic failure. Therefore, the only way to pass on an HV site is to have the Calibration Certificates that have actual test point errors on, as opposed to just the class accuracy. This is an issue because most parties do not have this paperwork and therefore everything will automatically fail.
- 4.3.4 Elexon noted the difference between the Desktop Audit and the on-site Inspection Visits. Desktop Audits just require evidence that Overall Accuracy can be calculated, therefore the certificate is not required if you can

⁵ 'Introduction of new Consumption Component Classes for Measurement Classes E-G'

prove Overall Accuracy through other means. A TAMEG member felt that the Audit should try and prove that Overall Accuracy was incorrect (i.e. outside limits), as opposed to the Meter Operator Agent (MOA) proving that the Overall Accuracy was correct (i.e. inside limits). Sometimes the paperwork was not available to prove Overall Accuracy but this should not justify a failure.

- 4.3.5 TAMEG noted that the impact of burden on Overall Accuracy, in particular when measurement transformers were under-burdened, was discussed under <u>Issue 93</u>⁶. A TAMEG member asked if the BSC should make obligations more explicit. There was some disagreement around burdens being an issue to Settlement.
- 4.3.6 A TAMEG member highlighted their dissatisfaction with the sentence in the report that states "[this] may indicate that there is a lack of knowledge in completing Overall Accuracy assessments at MOA companies". They felt that the issues with Overall Accuracy were much more likely due to the points made earlier, under this Agenda Item.
- 4.3.7 A TAMEG member highlighted that the Codes of Practice (CoPs) require measurement transformers not to be over-burdened therefore, the connected burden cannot exceed its rated burden. They then asked where Overall Accuracy fits if you consider what load is expected based on the agreements with the customer. A TAMEG member identified that this issue would be ongoing but the <u>National Measurement Transformer Error Statement</u> (NMTES) that was under development would help identify the average errors on these measurement transformers. Elexon also noted that they would accept NMTES data as evidence for the Overall Accuracy check.
- 4.3.8 The Chair suggested a BSC Party (or Elexon) could raise a Change Proposal to remove the requirement to confirm Overall Accuracy. TAMEG noted that Issue 93 Group had been considering this approach. There was some discussion around burdens that TAMEG felt would be better discussed at Issue 93 Group. Elexon agreed to raise this with the Issue 93 Group.

ACTION 46.04

- 4.3.9 A TAMEG member asked if there was any evidence that these Metering Systems were falling outside of the Overall Accuracy limits. The Chair suggested that if the rules are not appropriate then the TAMEG should consider a change to the governance to make it more appropriate and recommend it to the PAB.
- 4.3.10 A TAMEG member suggested a solution to Overall Accuracy not being met could be an MOA installing a higher class accuracy Meter.

4.4 **Commissioning**

- 4.4.1 A TAMEG member suggested that this section of the Audit was not about Commissioning, but rather, evidence that Commissioning took place. A TAMEG Member added that following a change of MOA, this evidence can be lost, which continues to be an issue for the industry.
- 4.4.2 Elexon confirmed that the high failure rate here was spread across industry and it was not due to a minority skewing the data. Failure here was not solely due to missing information, but also caused by invalid entries on the Commissioning records.
- 4.4.3 A TAMEG member noted their efforts to improve their Commissioning documentation internally and had noticed some improvement from industry however, there were still BSC Parties that did not have good quality documentation. They suggested Elexon could notify Licensed Distribution System Operators (LDSOs) of how they have performed in comparison to their peers. This would allow these Parties to put into place action plans to improve their Commissioning, and proactively improve, rather than to be notified by PAB and have to act reactively. Elexon agreed to look into how they would action this. TAMEG agreed with this informal action plan route, as opposed to formal Error and Failure Resolution (EFR) plans.

ACTION 46.05

4.4.4 The TAA explained that it would send the individual reports breakdowns for Parties/Party Agents, before the end of July 2021.

⁶ Review of BSC metering Codes of Practice

4.5 Settlement Data Mismatches

4.5.1 Elexon highlighted that the TAA received inaccurate data, and required the data in kWh but some parties were data sending in MWh and had to convert data to kWh. A TAMEG member suggested that the TAA should do this as there is more room for error when the parties are asked to manipulate data. The Chair agreed that in the future the TAA could perform this task, given that the party informs them of the granularity of the data, and Elexon could consider this change.

ACTION 46.06

4.6 Known Faults with the Metering System

4.6.1 A TAMEG member asked, of the 62 occasions noted in the report, what type of faults were they and did they impact Settlement. TAMEG agreed that a clearer definition of what was meant by fault may be necessary. Elexon confirmed that 'faults' related to the sending of a D0001⁷ and checking to see if there was a corresponding D0002⁸ sent. Elexon also noted that, due to the Covid-19 pandemic, it believed the data would likely be skewed and show more non-compliance in comparison to previous years. Elexon agreed to investigate what types of faults had occurred and, if possible, confirm the impact they had on Settlement.

ACTION 46.07

4.6.2 A TAMEG member suggested a comparison between the findings of this year and previous years would be valuable to see the difference when the market is not facing a pandemic. Elexon noted that this was the first year that the Desktop Audits took place. The initial intention was to only do Desktop Audits to a few sites but, due to the pandemic, they had to audit remotely.

4.7 Desktop Audits Recommended for Site Inspection Visit

4.7.1 Elexon explained that where there is reason to believe there may be issues affecting Settlement, highlighted by a Desktop Audit, then the TAA would recommend to Elexon that an Inspection Visit was required. Inspection Visits would be restarting from August 2021, the TAA representative confirmed Supplier Volume Allocation (SVA) on-site visits would become mandatory from 16 August 2021, as per PAB's request, and there would be at least a 20 working day lead-time to notify parties of a Site Visit.

4.8 Central Volume Allocation (CVA) Targeted Visits

4.8.1 A TAMEG member commented on the meeting with National Grid about finding out (in a non-confidential manner) about upcoming changes and new registration for Transmission System connected sites. A TAMEG member didn't not think that National Grid was the issue but rather the Registrant, as they should be aware of problems at sites that they are responsible for.

4.9 CVA Main Sample

4.9.1 Elexon noted the large volume of Commissioning record non-compliances seen in the CVA main Sample. There had been suggestions that Elexon feed in information about upcoming changes and new registrations to National Grid Electricity System Operator (NGESO) to allow that information to be communicated to MOAs. A TAMEG member noted their effort to get this information from National Grid in a non-confidential way.

5. Actions

- 5.1 Action 35.06 Elexon added a tabled agenda item to the meeting. Action to remain open.
- 5.2 Action 43.03 Elexon noted that it had analysed the CT/VT error data and found that most are already on NMTES. Of those four that are not, two do not yet have enough load point entries (and errors) to be added. Having checked non-compliances recorded by the TAA, adding the other two would fix 22 non-compliances out of 25,136, less than one-hundredth of a percent.
- 5.3 Given the amount of work involved in calculating the average error and taking a paper to Supplier Volume Group (SVG), Elexon believe this should not be a priority over the CoP review, CoP4 work, and the Retail Energy Code (REC) transition. A TAMEG member highlighted concerns around not progressing this work further and suggested pushing this work to LDSOs as opposed to Elexon. The Chair recommended that Elexon email LDSOs noting Elexon's findings and requesting further CT/VT error data for those CT/VTs that are not on the NMTES already. Elexon agreed to take the action.

⁷ 'Request Metering System Investigation'

⁸ 'Fault Resolution Report or Request for Decision on Further Action'

- 5.4 **Action 44.01** Action closed as the issue would be raised as per 44.02.
- 5.5 Action 44.02 To remain open.
- 5.6 **Action 45.01** Elexon noted they had a meeting with C & C (the TAA) about the reporting tool in the Technical Assurance Agent Management Tool 2 (TAAMT2), they also noted a 'drop-in session' to discuss the new tool that Elexon were intending to organise for the beginning of August 2021.
- 5.7 Action 45.02 Action closed.
- 5.8 Action 45.03 Action to remain open.
- 5.9 Action 45.04 Action to remain open.
- 5.10 Action 45.05 Action closed.
- 5.11 Action 45.05 Action to remain open as Elexon were still awaiting application forms from multiple parties.
- 5.12 Action 45.07 Action closed as report had been amended.

6. AOB

- 6.1 The Chair noted a personnel change in Risk and Technique Analyst, responsible for the Technical Assurance of Metering (TAM) technique at Elexon, from September 2021. Simon Waltho would replace Michael Taylor.
- 6.2 A TAMEG member noted the global semiconductor shortage, which has started to affect the supply of Meters. This will have an effect on new connections. They also questioned the discussion had in Issue 93 Group where it suggested the removal of Induction Disc IEC standards (BS EN/IEC 62053-11⁹) from CoP2. In light of the semi-conductor shortage the TAMEG member felt this may no longer be a good idea.
- 6.3 A TAMEG member noted that PAB agreed to remove RWE generation CVA MOA Qualification as they will no longer be providing CVA MOA services to the market.
- 6.4 A TAMEG member highlighted that Northern Powergrid was raising a cross code change to amend trigger points for onsite Commissioning. Northern Powergrid would not formally raise it until the REC go live date had passed but the change would also affect the BSC. The change would amend the trigger points to the energisation status data flow <u>D0134</u>¹⁰, because LDSOs struggle to meet the five day Service Level Agreement (SLA) after Commissioning.
- 6.5 Elexon advised the next TAMEG meeting date would be Wednesday 20 October 2021 at 10.00am.

⁹ 'Electricity metering equipment (a.c.) - Particular requirements - Part 11: Electromechanical meters for active energy (classes 0,5, 1 and 2)' ¹⁰ 'Request to Change Energisation Status'