

MINUTES

MEETING NAME	Unmetered Supplies User Group (UMSUG)
Meeting number	125
Date of meeting	13 March 2019
Venue	ELEXON Limited, 350 Euston Road, London NW1 3AW
Classification	Public

ATTENDEES AND APOLOGIES

Attendees	Victoria Moxham	VM	UMSUG Chairman
	Alan Marshall	AM	UMSUG Member
	Andy Guest	AG	UMSUG Member
	Angie Butlin	AB	UMSUG Member
	Paul Angus	PA	UMSUG Member
	Ryan Parker	RP	UMSUG Member
	Tom Chevalier	TC	UMSUG Member
	Nigel Birchley	NB	UMSUG Member
	Tym Huckin	TH	UMSUG Member (Teleconference)
	Nicola Dew	ND	UMSUG Member (Teleconference)
	Kevin Spencer	KS	ELEXON
	Sarah Ross	SR	ELEXON
	Adam Jessop	AJ	ELEXON
	Reanna Gordon	RG	ELEXON
	Nick Baker	NIB	Technical Secretary
Apologies	Walter Hood	WH	UMSUG Member
	Donna Townsend	DT	UMSUG Member
	Leanne Yates	LY	UMSUG Member
	Dave Johnson	DJ	UMSUG Member
	Sue Kinsella	SK	UMSUG Member

OPEN SESSION – DECISION PAPERS

1. **OID REDLINING FOR ACTION 124/03 (VALID COMBINATIONS OF CHARGE CODE AND SWITCH REGIME TABLES)**

- 1.1 At its last meeting (UMSUG124), the UMSUG had discussed and proposed changes to the OID ([UMSUG124/02](#)). Redlined changes to the OID had been circulated to the UMSUG ahead of the meeting. Since no Unmetered Supplies Operators (UMSOs) were present at its last meeting (UMSUG124) the UMSUG agreed that the decision on the changes should be made at this meeting.
- 1.2 ELEXON highlighted a comment from an UMSO in section 4.2 in the paper. The UMSO had highlighted four prefixes, which were either missing or required amendments in the table. There was also an issue with footnote 4 in the table. ELEXON confirmed these comments and further changes would be addressed in the OID.
- 1.3 ELEXON confirmed that once the UMSUG agreed changes to the OID, then it would be presented to the Supplier Volume Allocation Group (SVG) for approval.

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1.4 The UMSUG:

- a) **AGREED** that the changes to the OID are recommended to the SVG for approval;
- b) **NOTED** that, if approved, the OID Version 19.0 would be published at the same time as MDD.

2. BSCP520 CHANGE PROPOSALS AND DTC CHANGES

- 2.1 This paper highlighted two proposed change proposals to BSCP520 'Unmetered Supplies registered in SMRS'. The first related to removing the requirement to calculate reactive power (discussed at the last UMSUG meeting). The second change related to formalising the way that data is passed between parties under the unmetered supplies arrangements. The proposal was to allow revised and new DTC flows for Unmetered Supplies Operators (UMSOs) to provide Summary Inventories, control file (used for Central Management Systems) to Meter Administrators and changes to existing Half-hourly data flows.
- 2.2 ELEXON provided an update on Ofgem's Targeted Charging Review (Action 124/01). Ofgem's minded to position on the Targeted Charging Review does not refer to reactive power at all and hence ELEXON did not believe there were any issues with implementing the proposed changes for reactive power requirements to BSCP520 and the OID.
- 2.3 An UMSUG Member highlighted that they had raised the reactive power requirements at a DCUSA Meeting with no comments. They also highlighted that the BSC Change process would give industry the chance to comment on the removal of the requirements and flag any potential issues.
- 2.4 The UMSUG then discussed the second proposed change proposal linked to Market-wide Half Hourly Settlement (HHS). ELEXON advised that the change proposal would be raised and would need to be proposed to MRA for a change to the DTC. ELEXON would need to sponsor the change proposal and DTC proposal at IREG. The change would formalise Summary Inventories and CMS Control files.
- 2.5 An UMSUG Member highlighted that they had discussed the changes with a supplier, and their Data Collector who had agreed with the formalisation of the flow. The Data Collector responded in a positive manner and with further follow-up questions.
- 2.6 ELEXON asked whether the Measurement Class should be included for the MPAN in the data flow.
- 2.7 An UMSUG Member asked for clarification if the flow was intended to be per Supplier or per MPAN. It was confirmed that the intended flow was by MPAN and not by supplier.
- 2.8 An UMSUG Member also highlighted that the flow was intended to increase the granularity of the volumes from the current 0.1kWh to 0.001kWh in the new proposed flow.
- 2.9 An UMSO highlighted the potential challenges based on the current process in its role and how the new flow would change this. The UMSO highlighted that extremely small inventories of Unmetered Supplies which are needed for billing and not Settlement and raised concerns that even this new proposed flow wouldn't pick these up. An UMSUG Member confirmed that the suggested increased granularity of the flow should pick these up.
- 2.10 An UMSUG Member questioned whether there would be a return flow from the Meter Administrator (MA) back to the UMSO with a validation failure. The Member questioned whether this would still be an email or whether this could also be a flow. An UMSUG Member commented that this had been thought about in the proposal and suggested this made sense for a flow to be sent back when everything was valid, as well as when something was incorrect.
- 2.11 An UMSUG Member highlighted there would be two new data items in the DTC flow, a validation code and a prefix code.
- 2.12 An UMSUG Member suggested that a dual-purpose flow which could contain a Yes/No answer could also be a solution. Another UMSUG Member stated this could make a lot more work for UMSOs, with potentially

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thousands of flows to sift through for the Yes/No validity. They also argued that two separate flows for a Yes/No validation would be better for audit purposes.

- 2.13 ELEXON highlighted that the UMSUG needs to be in agreement in what is wanted from the Change Proposal so it is clear what is being taken to IREG.
- 2.14 When discussing the use of a DTC data flow for the submission of unmetered Half Hourly (HH) data by the Meter Administrator to the Half Hourly Data Collector (HHDC), ELEXON questioned whether the potential new flows would be mandatory to HH Data Collectors or to those who want to operate with unmetered supplies
- 2.15 An UMSUG Member asked if once the HHDC had loaded in the first instance would it not get a new flow on an update. ELEXON commented that there would presume there to be a flow every day.
- 2.16 The UMSUG Chairman asked what would the cost of this proposed change be versus the benefit it will provide.
- 2.17 ELEXON and the UMSUG agreed that the new proposed flows would help a potential issue in the future world and would be a step in the right direction towards Market-wide HHS, but it would not necessarily be the end-state.
- 2.18 An UMSUG Member stated that the changes would be a major issues to smaller customer and compared to what is the current industry practice.
- 2.19 ELEXON agreed that the Change Proposal for the use of a DTC flow to replace the Summary Inventory and CMS Control files from the UMSO to MA (including a potential rejection flow) would be redrafted with the help of an UMSUG Member and then would be re-circulated to other members.

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- 2.20 ELEXON advised that the discussions from the UMSUG on a data flow for the submission of unmetered data by the Meter Administrator to HHDC would be taken to the Market-wide HHS Design Working Group (DWG) as a step in the right direction towards Market-wide HHS. ELEXON also advised it would hold internal discussions to try and establish the right approach.

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- 2.21 The UMSUG:
 - a) **AGREED** that ELEXON raises the Change Proposal to remove the reactive power requirements from BSCP520 and the OID

3. GENERIC LED CHARGE CODE APPLICATION PROCESS

- 3.1 This paper identified areas of the Generic LED Lighting Charge Code process that manufacturers believe are currently open to interpretation and could be better clarified. ELEXON invited the UMSUG to discuss these and agree any clarifications.
- 3.2 ELEXON clarified that the current Generic LED Lighting Charge Code process remains fit for purpose, and that it was seeking UMSUG members' comments on the guidance available for customers and manufacturers.
- 3.3 ELEXON stated that references to dimming in the guidance were not necessarily what is required by ELEXON for the process. Dimming is covered by Variable Power Switch Regimes (VPSR) and therefore should not be factored into a Generic LED Charge Code range. A Generic LED Charge Code Range is designed to cover a variety of lighting products that run on the same driver, but with various consumption levels. A common example of this is a luminaire that is capable of various reduced-operation modes.
- 3.4 ELEXON asked the UMSUG how to better define Constant Light Output (CLO). Applications so far have tended to use a blanket 10% reduction on the maximum output. ELEXON has no way of validating that this

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10% reduction is reflective of how the luminaire actually performs in operation. ELEXON noted that the UMSUG had previously approved applications using this approach.

- 3.5 An UMSUG Member stated this was an old argument and that the driver is adjusting the output, and asked how ELEXON tests and proves this. ELEXON advised that currently a range is given, with the Lower Limit being valid, and the Upper Limit should be less than the maximum output of the driver.
- 3.6 An UMSUG Member asked how the CLO driver works and if the driver flows a fixed program or adjusts based on the output. The UMSUG Member commented that if there was an algorithm or set profile, then this could be used.
- 3.7 ELEXON highlighted that this issue is that the submitted range cannot be controlled. ELEXON can only provide guidance on what to submit. ELEXON stated the options, could be to ask for a top of the range blanket figure and then provide guidance on operating within the range and how to declare the Charge Code properly. The alternative would be for the algorithm to be provided for CLO products and then ELEXON to utilise this when creating the Charge Code.
- 3.8 ELEXON commented that methodologies are asked for with variable loads, so could do similar with CLO. ELEXON, however, highlighted that they do not have the time/resource for this compared to the benefit to Settlement it would provide.
- 3.9 The original concept with applications was to reduce the burden on ELEXON, but in the current state new application are more work and create more Charge Codes.
- 3.10 ELEXON highlighted the need to discourage applications with the same number of LED and driver but on different Charge Codes. ELEXON stated that if the reasons for doing this are commercial and not technical, then it should be discouraged on application.
- 3.11 ELEXON asked the UMSUG whether the Charge Code should be for the driver or for the product. The UMSUG advised that the product as a whole should be looked at and ELEXON advised that this is the approach, which is being followed so far.
- 3.12 ELEXON agreed to have conversations with UMSUG Members outside of the meeting, before circulating revised guidance documentation to all UMSG Members.

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- 3.13 The UMSUG:
 - a) **NOTED** the contents of this paper

OPEN SESSION – UPDATES

4. Measured Central Management System (mCMS) applications

- 4.1 ELEXON provided an update on an application from an EV charging manufacturer, which had not been put through for approval based on UMSUG comments. The applicant intended to re-apply in the near future, correcting the errors that the UMSUG identified during review.
- 4.2 ELEXON provided an update on another mCMS applicant. ELEXON carried out testing on 11 March 2019. The application included mid-approved meters, but that did not meet requirements as the display cannot be seen as it is housed within the unit. ELEXON advised the applicant was following the approach based on BEIS's guideline in that the meter was not an explicit measuring device.
- 4.3 ELEXON and the UMSUG agreed that mCMS application documentation needed to updated to include aspects such as logs and sub-meters. From applications completed so far, there are lessons which have been learnt which can go into the documentation.

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- 4.4 ELEXON advised that it would discuss with Dave Moorhouse as the UMSUG Member from the Regulatory Delivery body BEIS on what has been agreed.

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5. DWG and Market-wide Half-Hourly Settlement (HHS)

- 5.1 ELEXON updated the UMUSG on the recommended Target Operation Model (TOM), which has been published for Market-wide HHS and its consultation.
- 5.2 ELEXON advised that from a UMS view there would be a slight change to the current Meter Administrator role and Data service. The UMS calculations would remain identical, but changes in granularity would be linked to the discussed changes in the 'BSCP520 Change Proposals and DTC Changes' agenda item.
- 5.3 ELEXON advised that changes would potentially go live in 2023 and that UMSUG Members could find updates on the DWG page of the ELEXON website.

6. Performance Assurance Framework (PAF) review- UMS Risk

- 6.1 ELEXON discussed the work carried out so far as part of the PAF review and how it relates to unmetered supplies.
- 6.2 ELEXON highlighted that there are 8 focus risks, of which unmetered supplies risk in Settlement is one of them. ELEXON highlighted that the risk is overarching and has not necessarily been chosen for the estimated impact, but the lack of understanding.
- 6.3 ELEXON advised that each risk has a 'Risk Owner' (Adam Jessop for the unmetered supplies risk), and that issues can be flagged and then fed through the risk process which would lead to being discussed at the Performance Assurance Board (PAB).
- 6.4 ELEXON agreed to share with the UMSUG documentation on how the Unmetered Supplies risk was scored and to give the UMSUG a chance to comment.

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OPEN SESSION – OTHER BUSINESS

7. Discussion on decimal Watts in Charge Codes

- 7.1 An issue had arisen with equipment such as sensors, which use a very small amount of energy, but if there are thousands in operation, could lead to needing to be considered as part of unmetered supplies in Settlement. An UMSUG Member had suggested to ELEXON via email that the 10th digit on a 0000 Charge Code could be used to represent decimal Watts.
- 7.2 ELEXON questioned the value in making this change and stated that the declared Circuit Wattage should be used in calculations, not the 0 in the Charge Code.
- 7.3 UMSUG Members discussed making a sensors charge code under the Miscellaneous category. ELEXON agreed this approach would be sensible.
- 7.4 ELEXON stated it would need concrete views on this from the UMSUG, so that it could write a paper for a future meeting.

8. 2019 Meeting dates

- 8.1 ELEXON provided suggested meeting dates for the UMSUG for the remainder of 2019. These are:

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- a) 29 May 2019
- b) 28 Aug 2019
- c) 27 Nov 2019

8.2 ELEXON noted that these meeting dates would be subject to SVG approval. ELEXON also noted that they have avoided IREG meeting dates.

9. Actions

- 9.1 **Action 124/04**- Ongoing. ELEXON bought paper 125/03 to the UMSUG as an update on this action.
- 9.2 **Action 124/05**- Ongoing. ELEXON bought paper 125/03 to the UMSUG as an update on this action.
- 9.3 **Action 124/06**- Ongoing. ELEXON bought paper 125/03 to the UMSUG as an update on this action.
- 9.4 **Action 124/07**- Ongoing. ELEXON bought paper 125/03 to the UMSUG as an update on this action.
- 9.5 ELEXON noted that all other actions have been completed.

10. Matters arising

- 10.1 An UMSUG Member flagged that BSCP520 needed updating in section 3.10.2 and its associated footnote. ELEXON agreed to clarify with the UMSUG Member outside of the meeting if any further action is required.