

Chris Mack, Senior Policy Manager
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Dear Chris,

Energy Company Obligation (ECO3) methodologies for calculating electricity and gas supply volumes

We welcome the opportunity to comment on the questions posed in the above consultation document on the ECO3 methodologies.

As you are aware, ELEXON (as 'BSCCo') is the Code Administrator for the Balancing and Settlement Code (BSC). We are responsible for managing and delivering the end-to-end services set out in the BSC, for which we provide Code Manager, Delivery Body and Policy Delivery support. In addition, through our subsidiary, EMR Settlements Ltd, we are the EMR Settlement Services Provider, acting as Settlement Agent for the Contract for Difference and Capacity Market.

We have previously provided help to Ofgem on interpreting data for the ECO obligation. We have identified some issues with your proposals in the consultation. These are highlighted in the answer to Question 1 attached below. The background for the issues is based on two BSC Modifications as follows:

- [BSC Modification P300](#) introduced new Measurement Classes for elective Half-Hourly Settlement:
 - *Measurement Class "F" Half Hourly Metering Equipment at below 100kW Premises with current transformer or whole current, and at Domestic Premises*
 - *Measurement Class "G" Half Hourly Metering Equipment at below 100kW Premises with whole current and not at Domestic Premises*
- [BSC Modification P339](#) introduced new Consumption Component Classes (CCCs) that map to the above new Measurement Classes. In order to provide data for network changing the elective HH data is split out on the D0030 'Aggregated DUoS Report' using a mapping to the [Line Loss Factor Class Ids](#) (LLFCid) used to identify Distribution Tariffs.

Meter Data for the Low Voltage (LV) Domestic tariff is split out by LLFCid for each Grid Supply Point Group (GSPG). Therefore, we believe the data you require is already available on the D0030. Furthermore, we believe the consultation identifies the wrong CCCid '36' which is for Measurement Class E and relates to Active Export volume settled on actual readings. We believe you need CCCid '42' and '45'. More information is provided in response to the consultation question below. We are happy to discuss this response if you need clarification.

Yours sincerely,

Kevin Spencer

Senior Market Architect

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Q1. Do you know of any other considerations relating to calculation of electricity or gas supply volumes that we should be aware of that would help us to clarify the guidance? If so, set out any examples, and provide supporting evidence as required.

We believe the data required for the electricity calculation can be determined from the D0030 'Aggregated DUoS Report'. This is because the file contains meter data sorted by LLF Class Identifier (LLFCid) for each GSP Group (GSPG).

However, if you wish to use the D0296 'Supplier BM Unit Report' data, you should select the Aggregated BMU Energy (per GSP Group) data for the appropriate Consumption Component Classes (CCCs). Note this is the uncorrected version of the data as would be derived from the D0030.

The CCCs are set out in [Annex X2 of the BSC](#). Table X-8 on page 83 sets out the CCCs mapped to the Measurement Classes. Measurement Class F is covered by CCCids '42' to '53'. Where CCCid '42' is active Import consumption based on actuals and CCCid '45' is Active Import Consumption based on estimates. We believe both these CCCs are required for your calculation.

The consultation refers to CCCid '36', which as you will see from the table relates to active export data based on actual consumption for customers in and Measurement Class E (Half Hourly Metering Equipment at below 100kW Premises with current transformer).

Both Measurement Class C (>100 kW) and Measurement Class E could potentially have some small volumes of domestic data but there is no way to split the data out of BSC data flows.

It should also be noted that under the ongoing work on the Settlement Reform SCR (Market Wide Half Hourly Settlement (MHHS)) these Measurement Classes and CCCs are likely to be changed. In the next phase of detailed design work under the ELEXON-led expert groups (the Code Change and Development Group), we will be considering a rationalisation of Measurement Classes and CCCs for the new Target Operating Model (TOM). Therefore, further changes are likely to be needed to ECO3 calculation methodology, when MHHS is implemented.

Guidance should also be provided on the Settlement or reconciliation run type for which the consumption is to be calculated. This could be a single run type or latest available run type.