
Risk Evaluation Register 2023/24

Performance Assurance Board

Date of meeting **29 September 2022**

Paper number **PAB260/08**

Owner/author **Jessica Davis**

Purpose of paper **Information**

Classification **Public**

Document version **1.1**

Summary The Risk Evaluation Register (RER) for the 2023/24 Performance Assurance Operating Period (PAOP) sets out all of the currently identified Settlement Risks and assesses their potential materiality. This assessment is based on future events that could impact industry compliance with Balancing and Settlement Code (BSC) governed procedures. The RER assists with the subsequent development of the Risk Operating Plan (ROP), which will propose areas of specific focus for 2023/24.

Introduction

The BSC, Section Z 5.5, requires the Performance Assurance Board (PAB) to identify and evaluate Settlement Risks, in line with the Annual Performance Assurance Timetable (APAT). The PAB is required to prepare and maintain the RER, setting out the Settlement Risks and their significance.

The RER and the RER Ledger

This 2023/24 RER (effective from **1 April 2023** to **31 March 2024**) has been created based on Elexon's assessment of risk events that could impact Settlement the in 2023/24 PAOP and their predicted significance.

This RER sets out the following:

- Risk events that may occur in the 2023/24 PAOP;
- An assessment of the predicted impact that each risk event would have on individual Settlement Risks; and
- The forecasted impact of all identified Settlement Risks (in MWh) during the 2023/24 PAOP

This document is accompanied by a RER Ledger - a spreadsheet which sets out the predicted impact all of the current Settlement Risks and their controls and risk factors.

Predicted Risk impacts for 2023/24

Elexon has not re-scored the predicted impact of all of the Settlement Risks when producing this RER, as has been done in previous years. Instead, Elexon has considered which of the Settlement Risks may be impacted by forecasted risk events and/or Performance Assurance Technique (PAT) outputs, and updated these Settlement Risk impacts accordingly.

Where a Settlement Risk is predicted not to be impacted by forecasted risk events and/or PAT outputs, it is considered reflective of the predicted Settlement Risk impact recorded in the 2022/23 RER¹.

Elexon is undertaking an exercise to review the methodology used to evaluate all individual Settlement Risks and will make within-period revisions to the predicted Settlement Risk impacts where appropriate throughout the 2023/24 PAOP.

¹ <https://www.elexon.co.uk/documents/performance-assurance/processes/paf/risk-evaluation-register-2022-23/>

Predicted Risk Events for 2023/24

This section of the RER assesses risk events that could occur in the 2023/24 PAOP and their significance. For each risk event, a table has been included, which provides the predicted impact that the risk event would have on individual Settlement Risks² (increase or decrease), including the predicted severity of the impact.

Reduced supply of gas

There has been a continued increase in the price of gas, and subsequently a rise in the price of electricity. This has been exacerbated by the Russian-Ukrainian conflict and the ending of COVID-19 restrictions. With countries making plans to reduce reliance on Russian gas, threats of Russia cutting off the European gas supply, and the increased demand of Electricity as a result of COVID-19 restrictions ceasing, the wholesale gas price has risen.

This rise in costs has been passed on to the consumer, with Ofgem reviewing the price cap every three months as opposed to the previous approach of every six months. There is an increasing chance of widespread fuel poverty which has already led to movements such as the 'Don't Pay UK' campaign which encourages customers to stop paying their energy bills on 1 October 2022. Actions such as this may lead to an increase of pre-payment Meters or disconnections. An increase in pre-payment Meters across the market could improve Settlement accuracy, as Suppliers may receive remote Meter reads from pre-payment Meters more regularly.

It is expected that Suppliers will prioritise keeping their customers on supply whilst making savings. This may result in reduced time and resource being available to manage Settlement processes correctly. This consideration has not been included in the table below as it would affect all Settlement Risks, but is considered in Elexon's analysis of the risk event. It is likely that back office work would be deprioritised first, which may include processes such as Registrations, Agent appointments and Meter Technical Detail (MTD) updates.

Table 1 focuses on the scenario where the Ofgem price cap is above the wholesale price of energy. If the wholesale price for Electricity again exceeds the Ofgem price cap, then Elexon will refer to the RER 2022/23 'Table 3: Settlement Risks impacted by continuing frequent Supplier of Last Resort (SoLR) events' for all Settlement Risks that may be affected.

Table 1: Settlement Risks impacted by the reduced supply of gas

Risk	Title	Material effect	Severity	Comments
007	Retrieval of Metered Data	Decrease	Low	If more pre-payment Meters were to be installed, Suppliers may receive actual Meter reads more frequently, therefore this may reduce the potential material error.
010	Meter read history	Decrease	Low	If more pre-payment Meters were installed, there could be a more accurate Meter read history.
016	Energisation status	Increase	Low	If customers were to be de-energised due to unpaid bills, de-energisation processes would need to be run more frequently and therefore the potential for material error would increase.
018	Revenue protection	Increase	Medium	There is a possibility that the drastic increase in the Ofgem price cap will lead to an increase in stolen electricity.
025	Virtual Lead Parties	Increase	Low	The increased price of electricity made lead to more applications for parties to qualify as Virtual Lead Parties (VLPs). This could lead to an increase in balancing Services provided by VLPs allowing error to enter Settlement, such that the energy volumes required for Settlement are incorrect or missing.

² Each risk event assessment only includes the Settlement Risks that Elexon believes will be impacted to a material extent

Price of Electricity reduces

If the supply of gas stabilises or there is Government intervention in the pricing structures, the price of electricity could decrease for the consumer. Subsequently, this may encourage more Change of Supply (CoS) events. This will increase Settlement Risks that are affected by CoS events as shown in Table 2.

Additionally, Ofgem's Switching Program (Faster Switching) went live on 18 July 2022, which reduced the number of days it takes to switch Supplier from 21 Working Days to 5 Working Days.

The implementation of Faster Switching was a Risk Event captured in the 2022/23 RER. In response to our 2022/23 Assurance Survey, industry were concerned that Faster Switching would impact their operations due to shortened timescales to complete processes. Suppliers have yet to encounter high loads of Faster Switching CoS events because customers have been encouraged not to switch Supplier, and many Suppliers are not taking on new customers as a result of the increased price of electricity. Therefore, we are yet to note any impact to Settlement of the Faster Switching implementation.

Table 2 captures the effects of increased CoS events and includes the potential effects of Faster Switching.

Table 2: Settlement Risks impacted by increased number of CoS events

Risk	Title	Material effect	Severity	Comment
1	Registration	Increase	High	If a customer decides to switch shortly after their Metering System is installed, the number of days that the Supplier has to register a Metering system has reduced.
2	Attributes	Increase	High	If a customer decides to switch shortly after their Metering System is installed, the number of days that the Supplier has to assign attributes has reduced.
3	Metering Equipment installation, programming, maintenance and Commissioning	Increase	High	If the customer decides to switch at any time during an installation or fix, the number of days that parties have to complete this process has reduced.
5	Fault resolution	Increase	High	The customer may decide to switch multiple times during the resolution of a faulty Meter, this requires outstanding fault details to be transferred more frequently and quickly.
6	Meter Technical Details transfer and processing	Increase	High	More consumers switching would result in increased transfer of data and, due to reduced timescales, could result in more MTDs not being received or completed in the required timescale.
7	Retrieval of Metered Data	Increase	High	An increase of Change of Agent events would require more final reads. Faster switching reduced the number of days to run this process.
8	Processing of Metered Data	Increase	High	More CoS events would require more Meter reads being transferred to the Data Collector (DC) in a shorter time.
9	Data Aggregator processes Metered Data	Increase	Low	Data could be out of date due to the shortened timescales. This may increase the material error.
10	Meter read history	Increase	High	An increase in CoS events would require more transfers of Meter read history which could result in errors.
12	Metering Equipment Technical Detail Quality	Increase	High	More CoS events will result in an increase of transferred data. Additionally, if a customer decides to switch shortly after their Metering System is installed, the number of days that the Meter Operator Agent (MOA) has to create new MTDs has reduced.

13	Manual Adjustments	Increase	High	The customer can switch during this process potentially changing the responsibility to correct metered data and send the manual adjustments more frequently with the reduced timescale.
14	Agent appointments	Increase	High	More CoS events would result in more Agents being appointed and de-appointed. Additionally, the customer may decide to switch shortly after their Metering System is installed, the number of days that the Supplier has to appoint an Agent has reduced.
15	Reference data	Increase	High	More CoS events will result in an increase of transferred data.
17	Exception management	Increase	High	The customer may decide to switch multiple times during this process potentially changing the responsibility to investigate the exception more frequently.
18	Revenue protection	Increase	High	The customer may decide to switch multiple times during this process which would result in more transfer of investigations more quickly.

Metering Systems shortage

The Metering System shortage was included as a Risk Event in the 2022/23 RER. The event is ongoing and therefore still relevant for 2023/24. There is a continued global shortage of semiconductors, including those which are used in the construction of Metering Systems that are used for Settlement. This continues to result in a reduction of Meters being available to be installed both for new connections and fault resolution.

To deal with the shortage, some parties have been refurbishing and recycling old Metering systems. This should not impact the Settlement Risks, however a refurbished Meter would reach its end-of-life sooner and need to be exchanged within a shorter timetable than if it was a new Meter. Therefore this should be considered as a potential risk to Metering System accuracy in the future.

The Metering System shortage could be exacerbated with the ongoing Russian-Ukrainian conflict. A lot of the world's lithium, a material used to make Metering System, is sourced in Russia. If Russia decides to reduce (or stop) exportation of the material, it would likely contribute to increased shortages and potentially for a longer period of time. Additionally, there has been some unrest between Taiwan and China; Taiwan produces 90% of the world's semiconductors. If Taiwan had to reduce (or stop) creation or exportation of semiconductors this would also worsen the shortage.

Table 3 details the effects on the Settlement Risks, noting the different effects depending whether this shortage prevails or ceases.

Where, in Table 3, an increase in the material effect of a Settlement Risk has been projected when the Metering Systems shortage ceases, it should be noted that some of this effect may be a result of expedited work in an attempt to clear the backlog of Meters that need replacing.

Table 3: Settlement Risks impacted by Metering System shortage

Risk	Title	Scenario	Material effect	Severity	Comment
001	Registration	Prevails	Decrease	Low	There will be less Meters installed and subsequently less registration activities.
		Ceases	Increase	High	With Meters being installed there could be errors when registering the new Metering systems.
002	Attributes	Prevails	Decrease	Low	There will be less Meters installed and subsequently less attributes being applied to Metering Systems.

		Ceases	Increase	High	With Meters being installed there could be errors when registering the new Metering systems.
003	Metering Equipment installation, programming, maintenance and Commissioning	Prevails	Increase	High	Faulty Metering equipment could not be replaced (or not replaced in a timely manner).
		Ceases	Potential for increase and decrease	High	If Meters become available then there is potential for metering systems to be installed and programmed incorrectly and a potential increase in material error. However, this would also allow for commissioning and fixes to take place subsequently a decrease in material error
004	Notification of change to Metering Equipment	Prevails	Decrease	Low	There will be less Meters installed and subsequently less need to notify about changing Metering Equipment.
		Ceases	Increase	High	With Meters being installed there could be errors when sending notifications of changes of Metering Equipment.
005	Fault resolution	Prevails	Increase	Medium	Faults that require a change of Metering System will increase the material error.
		Ceases	Decrease	Low	This would allow for faults to be rectified and subsequently a decrease in potential material error.
007	Retrieval of Metered Data	Prevails	Increase	Low	Incorrect data could be retrieved following Meter faults.
008	Processing of Metered Data	Prevails	Increase	Low	Incorrect data being processed following Meter faults.
009	Data Aggregator processes Metered Data	Prevails	Increase	Low	Incorrect data could be processed following Meter faults.
014	Agent appointments	Prevails	Decrease	Low	If less Meters are installed, less new Agents would need to be appointed
		Ceases	Increase	High	With Meters being installed there could be errors when sending appointing agents and subsequently an increase in material error
016	Energisation status	Prevails	Decrease	Low	Less Meters installed means less Meters needing to be energised.
		Ceases	Increase	High	With Meters being installed there could be errors when sending energisation statuses and subsequently an increase in material error
019	Registration (CVA)	Prevails	Decrease	Low	There will be less Meters installed and subsequently less registration activities.
		Ceases	Increase	High	With Meters being installed there could be errors when registering the new Metering systems and subsequently and increase in material error.
020	Metering Equipment installation,	Prevails	Potential for increase	High	Faulty Metering equipment could not be replaced and therefore a potential increase in material error. However, with less installations and programming

	programming, maintenance and Commissioning (CVA)		and decrease		there would be less opportunity for error and the material error may decrease.
		Ceases	Potential for increase and decrease	High	If Meters become available then there is potential for Metering Systems to be installed and programmed incorrectly and a potential increase in material error. However, this would also allow for commissioning and fixes to take place subsequently a decrease in material error
021	Retrieval and processing of Metered Data (CVA)	Prevails	Increase	Low	Potentially incorrect data being retrieved following a meter fault not being corrected.
022	Notification of change to Metering Equipment (CVA)	Prevails	Decrease	Low	There will be less Meters installed and subsequently less need to notify about changing Metering Equipment.
		Ceases	Increase	High	With Meters being installed there could be errors when sending notifications of changes of Metering Equipment.
023	Fault resolution (CVA)	Prevails	Decrease	Low	There will be less Meters installed and subsequently less need to notify changes to Metering Equipment.
		Ceases	Increase	High	With Meters being installed there could be errors when sending notification of changes to Metering Equipment.
029	SAA calculation	Prevails	Increase	Low	Metered data could be incorrect due to Meter faults not being fixed.

Observed market performance decline

There was a decline in market performance as a result of the COVID-19 pandemic. Elexon continues to see this lower performance through different reporting mechanisms and PATs. Market performance decreases when there are higher volumes of estimated data entered into Settlement in proportion to the total volume of energy. There has been some improvement since the ending of the COVID-19 restrictions, however, market and individual party-level performance has yet to compare to the pre-pandemic levels. For example, HH market performance at R1 used to consistently be above 99% pre-pandemic, but is now approximately 98.5%.

Table 4 shows the Settlement Risks that could be contributing to market performance decline and how they affect performance when errors are made. This information has been gathered through EFR plans and discussions with BSC Parties.

Table 4: Settlement Risks impacted by observed market performance decline

Risk	Title	Material effect	Severity	Comments
001	Registration	Increase	Low	If a Meter Point is registered incorrectly, this can stop validation being completed for actual reads. Subsequently, resulting in higher volumes of estimated data entering into Settlement

002	Attributes	Increase	Low	If attributes are incorrect, this can stop validation being completed for actual reads. Subsequently, resulting in higher volumes of estimated data entering into Settlement
004	Notification of change to Metering Equipment	Increase	Low	Failure to notify changes to Metering Equipment and prevent the Meter being dialled or accessed, leading to an increase in data estimation in Settlement.
005	Fault resolution	Increase	High	Fault Resolution has big impact on HH performance and is the most significant cause of under-performance. Faults that are not rectified feed directly into Settlement Risk 007, as faults are the largest reason that Metered Data is not being obtained, leading to an increase in data estimation in Settlement.
006	Meter Technical Details transfer and processing	Increase	Low	Failure in this process can prevent Meters being dialled or accessed if changes are not updated. It can also impact more on contract round changes and result in delays to obtaining actual data for early Settlement Runs.
007	Retrieval of Metered Data	Increase	High	If HH Faults (Risk 005) are not rectified then metered data cannot be retrieved and subsequently leading to increased data estimation in Settlement. If there is a NHH legacy Meter they are hard to access either through lack of customer engagement, geographical or logistical issues or where Suppliers have poor collection processes. This results in increased data estimation in Settlement.
008	Processing of Metered Data	Increase	Medium	If data is not processed correctly it can lead to more estimated data if it fails validation or is not processed at all. The processing of Metered data can be impacted by migrations and contract rounds if there are backlogs that require processing and lead to some patches of poor performance until resolved.
009	Data Aggregator processes Metered Data	Increase	Low	If Data Aggregator Processing is incorrect this can result in increased estimation if there are defaults in SVAA.
010	Meter read history	Increase	Medium	Process failure can result in poor performance following a CoS, if Meter read history is not transferred then CoS reads cannot be validated properly which can lead to issues with reads later. If the Meter read history is incorrect it can result in CoS reads not passing validation resulting in estimation.
012	Metering Equipment Technical Detail Quality	Increase	Low	If MTDs are inaccurate this can result in data not being polled by DC.
014	Agent appointments	Increase	Low	If an Agent is not appointed correctly this can be an issue on migration and contract rounds resulting in delays to Agents being appointed and then onward processing which can result in periods of estimation following these sorts of events.
016	Energisation status	Increase	Low	If the Energisation status is wrong then there can be estimated volumes entering Settlement that should not. If the Meter is energised but set to de-energised and the status is discovered there have sometimes been large volumes of back dated estimation (especially in HH) until volumes are obtained.
017	Exception management	Increase	Medium	Many exception types can lead to data estimation in Settlement.

CVA market errors

During 2022/23 PAOP two significant errors were identified through targeted Technical Assurance Agent (TAA) site visits. These errors were caused by Current Transformer (CT) polarity³. In response to this the Technical Assurance of Metering (TAM) audit has expanded to include a larger number of visits to CVA GSPs. Therefore, further errors such as these could be found in the CVA market in the 2023/24 PAOP, Table 5 details the CVA Settlement Risks that may have caused these errors and, of which, materiality will be directly impacted depending on the type of error.

If further significant error is uncovered the impact of correcting them will directly impact NHH Suppliers through GSP Group Correction Factors (GGCFs). Consequently, money and resources may need to be directed away from Business As Usual (BAU) processes subsequently negatively impacting all Settlement Risks.

Table 5: Settlement Risks impacted by potential CVA Metering System errors

Risk	Title	Material effect	Severity	Comments
019	Registration (CVA)	Increase	High	Significate errors may be uncovered as a result of failure of any of the listed Settlement Risks.
020	Metering Equipment installation, programming, maintenance and Commissioning (CVA)	Increase	High	
021	Retrieval and processing of Metered Data (CVA)	Increase	High	
022	Notification of change to Metering Equipment (CVA)	Increase	High	
023	Fault resolution (CVA)	Increase	High	

Market-wide Half-Hourly Settlement (MHHS)

MHHS will move the whole electricity market to settle Half-Hourly (HH). This change is intended to make Settlement data more accurate and reduce the Settlement reconciliation timescale to four months. Elexon is already engaging with the programme manager to understand effect that this will have on the Performance Assurance Framework (PAF).

HH Settlement is a more accurate measurement of energy consumed as it does not rely heavily on annual data being profiled across Half Hourly periods throughout the year but instead on actual Half Hourly consumption values. Overall, Elexon expects that this will reduce the volume of error redistributed through the GSP Group Correct Factor. However, Elexon is mindful that the migration to MHHS may stretch some of the expertise within Performance Assurance Parties (PAPs) and may result in some parallel Assurance being required during the migration period.

The Elexon Assurance team will review changes surrounding the implementation of the programme during the 2023/24 PAOP. Elexon will review the MHHS design artefacts to determine the potential impact on the Settlement Risks and will provide a draft view for the PAB to review and provide comment on when complete.

Issues & Change Proposals (CPs)

Issue 103 - Meter Registrants and Settlement Risk – A New Way

BSC Issue Group 103 has been created to review existing controls for Settlement error prevention prior to the implementation of MHHS and, subsequently, the reduced Settlement timetable. The Issue Group will review the existing controls Elexon has in place to detect and mitigate Settlement errors, and further investigate the following

³ <https://www.elexon.co.uk/article/update-on-investigations-into-settlement-errors-at-two-gsp-groups/>

areas: Metering; Performance Monitoring and Investigations; and Roles and Responsibilities. As Issue 103 progresses the BSC Assurance team will identify the Settlement Risks affected.

BSC Audit Results

The 2021/22 BSC Audit was conducted from October 2021 to March 2022. There were 144 material findings across the PAPs in scope for testing this year, compared to 168 last year.

Of the 15 SVA Settlement Risks that were audited, the number of material issues for 11 Settlement Risks reduced from the last years Audit; the other four saw an increased number of material issues. An overview of these four are noted in Table 6.

The governance of SVA MOAs moved to the REC. The BSC Audit found that nearly 50% of all material issues were due to MOA process failures. It is likely that the BSC Audit will see a drop in material issues during the 2022/23 Audit cycle. It's also a concern that Elexon can no longer investigate or remedy these processes under BSC governance.

Table 6: Settlement Risks identified through the BSC Audit 2021/22

Risk	Title	Comments
3	Metering Equipment installation, programming, maintenance and Commissioning	This increase in material error was due to the management around the process of Commissioning, including the sending of relevant flows.
11	Unmetered Supplies	This increase in material error was due to the calculation of Estimated Annual Consumption (EAC) held by the Agent not matching the recalculation performed by the BSC Auditor.
12	Metering Equipment Technical Detail Quality	This increase in material error was due to the management of the Zero Final Reads process.
17	Exception management	This increase in material error was due to the management of D0095 (Non Half Hourly Data Aggregation Exception Report) and D0235 (Half Hourly Aggregation Exception Report) exceptions

Technical Assurance of Metering (TAM) Systems Audit Results

The 2021/22 TAM Audit was conducted from April 2021 to March 2022. Of the 383 SVA main sample Audits that were conducted, four Category 1 non-compliances⁴ and 709 Category 2 non-compliances⁵ were discovered. Of the 275 CVA main sample audits that were conducted three Category 1 non-compliances and 584 Category 2 non-compliances were discovered.

Table 7 details the Settlement Risks associated with the Category 1 non-compliances identified through the TAM Audit 2021/22. Elexon already has site of some of the Category 1 non-compliances from the 2022/23 so any trends emerging are also included.

During the 2022/23 PAOP, two significant errors were identified through TAA site visits, details of the associated Settlement Risks can be found in this document under the section "CVA market errors".

Table 7: Settlement Risks identified through the TAM Audit 2021/22

Risk	Title	Comments
3	Metering Equipment installation, programming,	The TAM Audit 2021/22 found the majority of non-compliances in incorrect measurement transformers. However, the results seen in the TAM Audit

⁴ Category 1 Non Compliance: A non-compliance has been identified from an Inspection Visit, which is deemed to be currently affecting the quality of data for Settlement purposes

⁵ Category 2 Non Compliance: A non-compliance has been identified from an Inspection Visit, which is deemed to be have the potential to affect the quality of data for Settlement purposes

	maintenance and Commissioning	2022-23 see an increase in error due to Metering equipment inaccurate or incorrect.
20	Metering Equipment installation, programming, maintenance and Commissioning (CVA)	The TAM Audit 2021/22 found non-compliance was due to CVA Metering equipment being inaccurate or incorrect.

Horizon Scanning

Phasing out of 2G and 3G comms

Elxon are looking at the impact of the cessation of Public Switched Telephone Network (PSTN), the sun setting of 2G and 3G networks, the subsequent growth of 4G Long Term Evolution (LTE) technology and how it relates to metering and will affects the Settlement Risks. This will be covered under a subgroup of Issue 93 (Review of the BSC metering Codes of Practice).

Radio Teleswitching Service

The Radio Teleswitching Service (RTS) was due to be decommissioned in April 2022, however, this has been extended until March 2024. Elxon will consider monitoring the number of RTS Meters and encourage migration to alternative Metering Systems. Elxon may ask for more detailed updates from Suppliers with RTS Meters remaining, and re-assess the risk posed to Settlement based on the market position at that time.

~~The Radio Teleswitching Service (RTS) was due to be decommissioned in April 2022. However, this is now set to be extended until April 2025 (to tie in with Market-wide Half Hourly Settlement implementation timescales). Therefore, during that three-year period, Elxon will monitor the number of RTS Meters and encourage migration to alternative Metering Systems. We anticipate that from mid-2024, Elxon will then ask for more detailed updates from Suppliers with RTS Meters remaining, and re-assess the risk posed to Settlement based on the market position at that time.~~

Review of the Energy Market Arrangements

The Review of the Energy Market Arrangements (REMA) seeks to review of electricity market design, to ensure that it is fit for the purpose of maintaining energy security and affordability for consumers as the electricity sector decarbonises. This is an ongoing review conducted by the governments Department for Business, Energy & Industrial Strategy (BEIS). As changes to market design are suggested, Elxon will assess the risk to Settlement.

Data Transfer Network transition to the Data Integration Platform

To enable MHHS, Ofgem have requested a new system: the Data Integration Platform (DIP). This will run some of the processes currently run by the Data Transfer Network (DTN). This will likely impact some of the data orientated BSC Settlement Risks such as Risk 008 "Processing of Metered Data" and Risk 010 "Meter Read History". Elxon will evaluate the associated Settlement Risks as the new system is developed.

Removal of Risk 027

Risk 027 'Payment Default', outlines the risk to Settlement in running the Payment Default process and subsequently the SoLR process. SoLRs can occur following a high risk event, such as a rise in wholesale electricity which means Suppliers sell at a loss.

The running of the SoLR or the Payment Default process does not pose a direct risk to Settlement. However there can be a knock on effect to other Settlement Risks when a SoLR event occurs, e.g. the Settlement Risks that cover processes associated with Change of Supplier (CoS). Therefore, Risk 027 will be removed from the Risk Register as a Settlement Risk and added as a risk event.

The Settlement Risks associated to an increased number of SoLR events were evaluated in the 2022/23 RER under section 'Rise in Electricity Prices' in Table 3. If there was increase in SoLR events then Table 3 would be consulted and assurance applied as appropriate to mitigate the material error.

Risk Assessment Detail

The Settlement Risk predicted impacts have been amended as appropriate for the 2023/24 RER in Table 7 below.

Exxon has considered which of the Settlement Risks may be impacted by forecasted risk events and / or PAT outputs, and updated these Settlement Risk impacts accordingly.

Where a Settlement Risk is predicted not to be impacted by forecasted risk events and / or PAT outputs, it is considered reflective of the predicted Settlement Risk impact recorded in the 2022/23 RER.

Exxon's BSC Assurance team are conducting a project during the last of the 2022/23 PAOP through to the beginning of the 2023/24 PAOP to review and readjust the Settlement Risk scoring. Intermittently, the Settlement Risk scores will be updated in the RER ledger to reflect the changes made to the scoring methodology.

The financial impact of each Settlement Risk has not been included in the 2023/24 RER. With the volatile price of wholesale electricity it would not be a true reflection of the impact at a defined time.

Table 8: Settlement Risk scoring comparison

Risk	Title	Scoring for 2022/23			Scoring for 2023/24			Change in Materiality 22/23 – 23/24
		Lower Impact	Impact	Upper Impact	Lower Impact	Impact	Upper Impact	
1	Registration	£1.3m	£3.8m	£10.3m				
		23.6k MWh	43.3k MWh	82.4k MWh	23.6k MWh	43.3k MWh	82.4k MWh	0%
2	Attributes	£94.4k	£655.5k	£2.5m				
		1.7k MWh	7.5k MWh	20.2k MWh	1.7k MWh	7.5k MWh	20.2k MWh	0%
3	Metering Equipment installation, programming, maintenance and Commissioning	£35.9m	£208m	£640.3m				
		655.2k MWh	2.4m MWh	5.1m MWh	884.5k MWh	3.2m MWh	6.9m MWh	+35%
4	Notification of change to Metering Equipment	£1.4m	£4.5m	£10.7m				
		24.7k MWh	51.5k MWh	85.2k MWh	24.7k MWh	51.5k MWh	85.2k MWh	0%
5	Fault resolution	£17.6m	£52.5m	£134.3m				
		322.2k MWh	604.8k MWh	1.07m MWh	322.2k MWh	604.8k MWh	1.07m MWh	0%
6	Meter Technical Details transfer and processing	£1.9m	£5.4m	£15.5m				
		34.6k MWh	61.9k MWh	124.2k MWh	34.6k MWh	61.9k MWh	124.2k MWh	0%
7	Retrieval of Metered Data	£18.4m	£97.5m	£261m				
		335k MWh	1.1m MWh	2m MWh	385.2k MWh	1.2m MWh	2.3m MWh	+15%

8	Processing of Metered Data	£5.1m	£12.4m	£24.0m				
		92k MWh	143k MWh	192k MWh	101.2k MWh	157k MWh	211.2k MWh	+10%
9	Data Aggregator processes Metered Data	£20k	£125k	£1m				
		364 MWh	1.4k MWh	8.8k MWh	364 MWh	1.4k MWh	8.8k MWh	0%
10	Meter read history	£84.7k	£3.6m	£13.9m				
		1.5k MWh	41.1k MWh	111.2k MWh	1.5k MWh	41.1k MWh	111.2k MWh	0%
11	Unmetered Supplies	£11m	£19.5m	£31.6m				
		199.5k MWh	224.7k MWh	252.7k MWh	199.5k MWh	224.7k MWh	252.7k MWh	0%
12	Metering Equipment Technical Detail Quality	£1.1m	£6.1m	£21.0m				
		20.6k MWh	69.8k MWh	168.0k MWh	20.6k MWh	69.8k MWh	168.0k MWh	0%
13	Manual Adjustments	£11m	£23.8m	£46.2m				
		201.1k MWh	274k MWh	369.8k MWh	201.1k MWh	274k MWh	369.8k MWh	0%
14	Agent appointments	£2.1m	£6.5m	£15.7m				
		39.2k MWh	75.3k MWh	125.4k MWh	39.2k MWh	75.3k MWh	125.4k MWh	0%
15	Reference data	£6.1k	£990.1k	£11m				
		111 MWh	11.4k MWh	88.1k MWh	111 MWh	11.4k MWh	88.1k MWh	0%
16	Energisation status	£3.7m	£21.8m	£54.2m				
		67.4k MWh	251.2k MWh	433.6k MWh	67.4k MWh	251.2k MWh	433.6k MWh	0%
17	Exception management	£0	£352.2k	£39.6m				
		0 MWh	4k MWh	31.7k MWh	0 MWh	5k MWh	38k MWh	+20%
18	Revenue protection	£5.5m	£9.9m	£25.3m				
		100.0k MWh	114.4k MWh	202.0k MWh	100.0k MWh	114.4k MWh	202.0k MWh	0%
19	Registration	£2k	£2.9m	£12.4m				
		21 MWh	3.1k MWh	17.2k MWh	21 MWh	3.1k MWh	17.2k MWh	0%
20	Metering Equipment installation, programming, maintenance and Commissioning	£485.5k	£2m	£6.7m				
		8.8k MWh	23.4k MWh	53.5k MWh	9.7k MWh	25.8k MWh	58.9k MWh	+10%
21	Retrieval and processing of Metered Data	£18.9m	£107.5m	£324m				
		344.9 MWh	1.2m MWh	2.6m MWh	344.9 MWh	1.2m MWh	2.6m MWh	0%
22	Notification of change to Metering Equipment	£0	£5.3m	£54.5m				
		0 MWh	62k MWh	436.0k MWh	0 MWh	62k MWh	436.0k MWh	0%
23	Fault resolution	£22.6m	£88.7m	£267.7m				
		412.2k MWh	1m MWh	2.1m MWh	412.2k MWh	1m MWh	2.1m MWh	0%
24	Reference data	£0	£304.7k	£4.4m				
		0 MWh	3.5k MWh	34.9k MWh	0 MWh	3.5k MWh	34.9k MWh	0%

25	Virtual Lead Parties	Risk Reassessment to be made following completion of P375/376 in 22/23 PAOP						N/a
								N/a
26	Aggregation Rules	£0.0k	£4.3m	£14.7m				
		0 MWh	49.9k MWh	117.8k MWh	0 MWh	49.9k MWh	117.8k MWh	0%
28	NETSO submissions	£13.7k	£3.8m	£75.4m				
		251 MWh	44.7k MWh	603.7k MWh	251 MWh	44.7k MWh	603.7k MWh	0%
29	SAA calculation	£0.0k	£508.0k	£750.0k				
		0 MWh	5.8k MWh	6k MWh	0 MWh	5.8k MWh	6k MWh	0%
30	ECVAA processes	£8.1m	£15.6m	£26.7m				
		147.5k MWh	1800k MWh	213.5k MWh	147.5k MWh	180k MWh	213.5k MWh	0%
31	FAA processes	£0.0k	£133.8k	£291k				
		0 MWh	1.5k MWh	2.3k MWh	0 MWh	1.5k MWh	2.3k MWh	0%
32	Manual adjustments	£483.8k	£2.5m	£22.4m				
		8.8k MWh	29k MWh	179k MWh	8.8k MWh	29k MWh	179k MWh	0%
33	Metered Volumes for Interconnector Users	£0	£151.9k	£1.9m				
		0 MWh	1.7k MWh	15 MWh	0 MWh	1.7k MWh	15 MWh	0%
34	SVAA data processing	£0	£206.5k	£10.3m				
		0 MWh	2.4k MWh	82.1k MWh	0 MWh	2.4k MWh	82.1k MWh	0%

For more information, please contact:

Jessica Davis, Risk and Technique Analyst

Jessica.Davis@elexon.co.uk

020 7380 4290