

# CP Consultation Responses

## CP1484 'Introduction of Additional SVAA Validation at SVA Run time'



This CP Consultation was issued on 6 March 2017 as part of CPC00775, with responses invited by 31 March 2017.

### Consultation Respondents

Respondent	No. of Parties/Non-Parties Represented	Role(s) Represented
TMA Data Management Ltd	0/1	Supplier Agent
E.ON Energy Solutions	1/0	Supplier
SSE Energy Supply Limited	1/1	Supplier and Supplier Agent
ScottishPower	1/1	Supplier and Supplier Agent
IMServ Europe	0/1	Supplier Agent

## Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
TMA Data Management Ltd	✓	✓	✓	✓
E.ON Energy Solutions	✓	✓	✓	✓
SSE Energy Supply Limited	✓	✓	✗	✓
ScottishPower	✓	✓	✓	✗
IMServ Europe	✓	✓	✓	✓

## Question 1: Do you agree with the CP1484 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	No comment.
E.ON Energy Solutions	Yes	<p>We are generally comfortable with the proposed solution.</p> <p>It is not clear to us if Elexon has considered Trading Disputes that may arise from new connections, where incorrect estimates are made between parties determining how much energy a site will use. This may lead to instances of inaccurate data being submitted based on such assumptions, which may lead to SVAA validating against an erroneous value for the new site.</p>
SSE Energy Supply Limited	Yes	<p>Yes. When considering the level of validation currently afforded by the SVAA for DA data vs the value of yearly trading disputes and the impact they have on volume/funding reallocation for suppliers an increase in accuracy of volumes entering and allocated in Settlement appears to be a sensible next step.</p> <p>ELEXON in raising this change has recognised that there is both a requirement and an ability to provide additional assurance in mitigating the potential risk and cost to suppliers of DA data errors and therefore there is a responsibility to help to ensure the integrity of SVA DA data by providing this assurance. Further to this and realising the importance of keeping the level of checks proportional to the role of the SVAA, the level of validation detailed in the change appears to be appropriate in order to catch the larger data errors and therefore avoiding a negative impact to the intended value or timeliness of this process.</p> <p>The current GCF tolerance appears to be nonsensical and ineffective, a review and</p>

Respondent	Response	Rationale
		appropriate application is supported.
ScottishPower	Yes	<p>We recognise that this change proposes a more efficient process for the SVAA, however we require to understand what it would entail as to how the affected party would be notified of any substitution performed by the SVAA Operator, not with standing assurance that the activities would be executed accurately through the auditing process.</p> <p>The proposal is also difficult to further gauge without the new tolerance parameter range being defined at this stage; therefore we would request further clarity to confirm in particular relative to the timelines for resolution. Once this has been provided we can make an informed assessment of the quantified impacts that would be expected, and develop internal requirements to support this process.</p> <p>It is worth noting that there is a process in existence where upon the Data Collector is notified of erroneous data at MPAN level. Therefore we would question the value that adding an additional stage of validation at GSP level would provide, as the actions required for this proposal would be for the Data Aggregator to identify into specific MPANs causing the erroneous data, which the Data Aggregator would in turn require to speak with the relevant Data Collector(s) to investigate. The time available to complete this process are expected to be short, so the feasibility of this process working as intended is also questionable.</p>
IMServ Europe	Yes	<p>It can often be the case that the errors this Change Proposal is seeking to address can be caused by the HHDA receiving erroneous data from the HHDC. Has any thought been given to including any obligations on the HHDC, in terms of aiding the investigation for example?</p>

## Question 2: Do you agree that the draft redlining delivers the CP1484 proposed solution?

### Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

### Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	No comment.
E.ON Energy Solutions	Yes	No comment.
SSE Energy Supply Limited	Yes	No comment.
ScottishPower	Yes	No comment.
IMServ Europe	No	<p>My only concern here is that only genuine issues are identified and presented to HHDA's for analysis / correction.</p> <p>In order to achieve this, any method used to determine the plausibility of data needs to take account of variations in consumption based factors such as the day of the week, public holidays, contract activity, the varying performance requirements for different measurement classes (the difference from SF to R1 is likely to be more pronounced for Measurement Class E/F/G compared to C, in fact, I don't understand why these checks only include Measurement Class C). Total MSID counts also need to cater for changes caused by contract activity; simply comparing a count for a given HHDA for 01/04 to 31/03 may result in files being un-necessarily rejected.</p> <p>This suggests either some intelligence needs to be built in to determining such thresholds, or the thresholds are fairly generous and so fail to detect genuine issues. The logic for setting a threshold should include both a percentage shift and an</p>

Respondent	Response	Rationale
		<p>absolute value, I suggest.</p> <p>The logic behind setting these thresholds is not detailed within the red line documents.</p> <p>The response time is (understandably) tight on the HHDA to correct any errors, so again only legitimate errors should be raised as much as possible.</p> <p>Historically, some of the errors that have come to light have been difficult to trace back to where the error originated. I remember once instance where a Supplier had populated an EAC value with an MPAN, resulting in the HHDC estimating very high values. This took significant effort to identify and required investigation by the HHDC as well.</p> <p>A second, historical example I recall, are instances where Meter Operators have provided post-dated D268s for MPANs where the HHDC has already collected data, which then change the values the HHDC issues to the HHDA. Given the HHDA has no view of Meter Technical Details, it is difficult for the HHDA to detect and trap these.</p> <p>From an HHDA point of view, these errors could only be traced to a given Supplier, Settlement Date, GSP, CCC (and based on CCC whether import/export and which Measurement Class) combination and not down to MPAN. Therefore the HHDA would have to look at the incoming D0036s in order to drill down but with no knowledge of a change in MTDs. This is a further good example of how difficult it would be for the HHDA to respond within 2 hours and the fact we don't want too many false alarms therefore.</p> <p>Should the HHDA not be able to resolve the error within the D0040/298 within the 2 hour time limit, what action would SVAA then take? Although the HHDA would endeavour to identify and correct erroneous data, it may not always be possible, for the above reasons.</p>

## Question 3: Will CP1484 impact your organisation?

### Summary

Yes	No	Neutral/No Comment	Other
5	0	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	Our HHDA and NHHDA procedures are impacted by CP1484.
E.ON Energy Solutions	Yes	Process changes will be required.
SSE Energy Supply Limited	Yes	Yes, indirectly. It would impact SSE ESL as a supplier in a positive manner through reduction of data errors entering settlement, revenue impacts and consequential associated administrative activities.
ScottishPower	Yes	Our systems and processes would be required to be updated to facilitate the change. The notification from SVAA would require a route into the business and resource allocated to resolve the issues.
IMServ Europe	Yes	Each case where the SVAA identifies 'erroneous' data, this will need to be investigated by a senior HHDA Data Analyst.  Some new reporting tools may need to be developed.

## Question 4: Will your organisation incur any costs in implementing CP1484?

### Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	There would be minimal one off costs to implementing CP1484.
E.ON Energy Solutions	Yes	There will be some increased ion processing costs, the level of which is difficult to estimate t this time.
SSE Energy Supply Limited	No	No costs, however, there would be some resource savings through the reduction of activities already mentioned.
ScottishPower	Yes	Yes there would be one off costs to implement the new process. There would be ongoing costs to support this long-term.
IMServ Europe	Yes	Providing the appropriate tolerances are in place, there should be no significant costs in supporting CP1484.

## Question 5: Do you agree with the proposed implementation approach for CP1484?

### Summary

Yes	No	Neutral/No Comment	Other
4	1	0	0

### Responses

Respondent	Response	Rationale
TMA Data Management Ltd	Yes	We agree with an implementation date of 02/11/2017.
E.ON Energy Solutions	Yes	No comment.
SSE Energy Supply Limited	Yes	Yes, the lead time appears to be appropriate to analyse and identify GCF tolerances and test central systems. It is important that this change is not rushed due to the scale of the potential impact of getting it wrong.
ScottishPower	No	In conjunction with our concerns raised in Q1, we would recommend that this be delayed until the February 2018 release. This is based on the proposal outlining a lengthy software update and testing phase which we feel is impracticable, given the timeline available. We also feel that much more detail is required about the tolerances being used in order to make an informed decision on support or opposition.
IMServ Europe	Yes	I assume that any Settlement runs performed after 02/11/17 would be subject to the additional proposed validation checks, regardless of the Settlement date, rather than Settlement dates after 02/11/17, please can this be confirmed?

## Question 6: Do you have any further comments on CP1484?

### Summary

Yes	No
0	5

### Responses

Respondent	Response	Comments
TMA Data Management Ltd	No	No comment.
E.ON Energy Solutions	No	No comment.
SSE Energy Supply Limited	No	No comment.
ScottishPower	No	No comment.
IMServ Europe	No	No comment.

## CP Redlined Text

### BSCP503

Location	Comment
3.4.2.6	Where data previously submitted is proven to be correct, what information should the HHDA send to SVAA?

### BSCP508

Location	Comment
3.3.3	Where data previously submitted is proven to be correct, what information should the HHDA send to SVAA?
3.3.3	How is the SVAA expected to react should no response be received from the HHDA within the 2 hour time limit?

### SVA Data Catalogue Volume 1

Location	Comment
NA	No comment

### SVAA User Requirement Specifications

Location	Comment
NA	No comment