

# MINUTES

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<b>MEETING NAME</b>	Unmetered Supplies User Group (UMSUG)
<b>Meeting number</b>	121
<b>Date of meeting</b>	10 October 2017
<b>Venue</b>	ELEXON Limited, 350 Euston Road, London NW1 3AW
<b>Classification</b>	Public

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## ATTENDEES AND APOLOGIES

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<b>Attendees</b>	Kathryn Coffin	UMSUG Chairman
	Angela Butlin	UMSUG Member
	Dave Johnson	UMSUG Member
	David Moorhouse	UMSUG Member
	Leanne Cavagan	UMSUG Member (by teleconference)
	Mark Webber	UMSUG Member
	Mike Hawkins	UMSUG Member
	Tom Chevalier	UMSUG Member (by teleconference)
	Tym Huckin	UMSUG Member (by teleconference)
	Walter Hood	UMSUG Member (by teleconference)
	Nigel Birchley	Attendee, Power Data Associates
	Nicola Dew	Attendee, Northern Powergrid (by teleconference)
	Kevin Spencer	Technical Expert, ELEXON
	Adam Jessop	Operational Expert, ELEXON
	Chris Stock	Operational Expert, ELEXON
Sam Daoudi	Attendee, ELEXON	
Riccardo Lampini	Technical Secretary, ELEXON	
<b>Apologies</b>	Andrew Eades	UMSUG Member
	Bryan Heap	UMSUG Member
	Donna Townsend	UMSUG Member
	Ian Jones	UMSUG Member
	James Everley	UMSUG Member
	Keith Henry	UMSUG Member
	Lindsay McGregor	UMSUG Member
	Mark Burton	UMSUG Member
	Paul Angus	UMSUG Member

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## OPEN SESSION – DECISION PAPERS

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### 1. BSCP520 redlining for Action 118/05 – UMSUG121/01

- 1.1 ELEXON presented draft redlined changes to [BSCP Procedure \(BSCP\) 520 'Unmetered Supplies registered in SMRS'](#) to discharge UMSUG Action 118/05. ELEXON invited the UMSUG to agree the final redlining for progression through a Change Proposal (CP).
- 1.2 The UMSUG discussed the proposed redlined changes to Section 4.6.2. It noted that the current BSCP wording states that:

'When contacting the PECU [Photo Electric Control Unit] array, the MA [Meter Administrator] shall ensure that any difference between the PECU array second counter and the EM [Equivalent Meter] clock time equivalent *does not exceed 20 seconds in any 24 hour period*. When the difference does exceed 20 seconds, the PECU array switching data should not be retrieved and the EM should be reset such that time on PECU array and the EM are synchronised'.
- 1.3 ELEXON noted the suggestion of two UMSUG members that this should be changed to delete the words 'in any 24 hour period'. UMSUG members discussed the practical difference between the two sets of wording. An UMSUG attendee suggested that, under the existing wording, you could gain/lose 19 seconds per day for an indefinite period and that could still be deemed acceptable as it would not exceed 20 seconds in any 24 hour period. Under the proposed redlining, with the same 19 second gain/loss per day, it would be deemed unacceptable on day two. The Chairman noted that it depended how you interpreted the 24 hour requirement: was this intended to be cumulative, or a snapshot each day?
- 1.4 An UMSUG member considered that there appeared to be little practical difference between the two sets of wording, on the basis that the EM will usually contact the PECU array every day. An UMSUG attendee suggested that if the EM is unable to contact the PECU array for a few days, then it could make a difference. However, they considered that this scenario could indicate a more serious PECU issue that would be likely to require resynchronisation anyway.
- 1.5 An UMSUG member proposed that the EM should be reset if its time is more than 20 seconds different from the time to which the EM was initially set. Another UMSUG member did not believe this to be appropriate, noting that the BSCP requires the EM to be synchronised with Universal Co-ordinated Time (UTC). The Chairman noted that this was also not the effect of either the existing wording or the proposed redlining.
- 1.6 An UMSUG member noted the paper's statement that the proposed changes were minor and would have no impact on MAs. They considered that the proposed wording change would require changes to some existing EM systems and as such would be more than a simple clarification or housekeeping change.
- 1.7 ELEXON noted that the BSCP set out minimum requirements and that there was nothing to prevent individual MAs from exceeding these by resetting the EM more frequently.
- 1.8 On balance, the UMSUG therefore agreed to remove the proposed redlining from this section and retain the existing wording.
- 1.9 The UMSUG also agreed to remove the proposed addition of the words 'of the EM time' at the end of Section 4.6.3.3(i):

'The hardware and software associated with any Central Management System shall be installed, maintained and operated in accordance with Good Industry Practice, with clocks synchronised to UTC and accurate to within  $\pm 20$  seconds *of the EM Time*.'

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- 1.10 This was on the basis that the BSCP already requires both Central Management Systems (CMS) and EMs to be synchronised with UTC, and so an additional requirement to synchronise the CMS with the EM would not add anything.
- 1.11 The UMSUG agreed the other BSCP520 changes proposed in the paper. ELEXON noted that these changes on their own were very minor and invited UMSUG members to suggest any other changes for inclusion in a CP. The Chairman noted that the next agenda item (UMSUG121/02) might also result in changes to BSCP520.

**Action 121/01**

1.12 The UMSUG:

- a) **AGREED** the redlined changes to BSCP520, with some amendments; and
- b) **NOTED** that ELEXON will raise a CP to implement the agreed changes.

## 2. BSC Audit Market Issues – UMSUG121/02

- 2.1 Power Data Associates (PDA) highlighted BSC Audit Market Issue 3781 relating to Unmetered Supplies (UMS). It invited the UMSUG to discuss potential changes to BSCP520.
- 2.2 ELEXON noted that BSCP520 Sections 1.1.2(q) and 3.2 already require Unmetered Supplies Operators (UMSOs) to validate inventories against the OID and associated spreadsheets. It noted that this requirement was added by [CP1368 'Clarify/Resolve Operational Issues Related to Unmetered Supplies in SMRS'](#). The Chairman suggested that the Market Issue appeared to relate to the lack of a timescale on this validation. The UMSUG noted that the BSC could not place obligations on Customers. However, an UMSUG member suggested amending Section 3.2 to include a timescale within which the UMSO has to either accept or reject an inventory.
- 2.3 ELEXON sought views on an appropriate timescale, initially suggesting 10 Working Days (WDs). An UMSUG member proposed 15 Working Days (15WDs) on the basis that inventory submissions may not be evenly spaced (for example, the UMSO might receive a raft of submissions at the start of a month). This member disagreed with another member who believed the timescale could be shorter. ELEXON noted that setting the timescale too short risked UMSOs disagreeing with the CP. The Chairman suggested that 15WDs was an improvement on the current open-ended timescale and would at least solve the Audit issue. She suggested proposing 15WDs in the CP but asking a specific consultation question on whether this is an appropriate timescale. The UMSUG agreed.
- 2.4 ELEXON noted in passing that Section 1.1.2(q) still referred to Valid Dimming Combinations and should be amended to 'Variable Power Switch Regimes'. ELEXON agreed to run a search to also correct any other similar references in the BSCP.
- 2.5 ELEXON noted the second part of the Market Issue about audit trails. The Chairman noted that BSCPs do not usually prescribe detailed audit requirements: [Party Service Line \(PSL\) 100](#) requires the maintenance of audit trails and the BSCPs specify the information required to be transferred/used for each process. ELEXON queried the problem, as the Market Issue noted no concerns over the actual retention of audit trails. An UMSUG member agreed and proposed that ELEXON should discuss this with the BSC Auditor to see if it could be closed.
- 2.6 On the last part of the Market Issue, ELEXON agreed with PDA that UMSOs and MAs only need to acknowledge receipt of the D0269/D0270 Market Domain Data (MDD) flows if they had specifically asked to receive them. This is because [CP1398 'Clarifications to BSCP520 'Unmetered Supplies registered in SMRS''](#) made their receipt optional through the addition of footnote 7 to Section 3.10. ELEXON volunteered to clarify this with the BSC Auditor so that this part of the Market Issue could be closed.

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- 2.7 An UMSUG member suggested that ELEXON should discuss its proposed redlining and the other parts of the Market Issue with the BSC Auditor before raising the CP. ELEXON agreed. ELEXON also agreed to circulate the redlining to the UMSUG for review by correspondence.

**Action 121/01**

- 2.8 The UMSUG:

- a) **NOTED** Market Issue 3781;
- b) **AGREED** that ELEXON will draft BSCP520 changes to introduce timescales for UMSOs validating inventories, and will include these in the CP raised under Item 1 above;
- c) **AGREED** that ELEXON will circulate these draft changes to the UMSUG for review by correspondence;
- d) **AGREED** that BSCP520 already appears to address the remaining aspects of the Market Issue; and
- e) **AGREED** that ELEXON will discuss the BSCP520 drafting and Market Issue with the BSC Auditor before raising the CP.

### 3. Proposed change to Standard Inventory Format – UMSUG121/03

- 3.1 PDA invited the UMSUG to consider potential changes to the Standard Inventory Format specified in the UMS [Operational Information Document](#) (OID).

- 3.2 ELEXON noted that the intention is to enable identification of equipment connected to Independent Network Operators (IDNOs) when submitting a single inventory to the main Distribution Network Operator's (DNO's) UMSO. This follows implementation of [Distribution Connection and Use of System \(DCUSA\) CP 282 'Embedded Distribution Network Operator \(EDNO\) UMSO'](#). It noted PDA's proposal to reuse optional Field 15 ('Exit Point'); however some UMSUG members believed that this was still in use.

- 3.3 The UMSUG discussed whether one, or two, new fields would be best – and whether these should be alphanumeric or free text. The UMSUG noted the need to identify both the IDNO and, potentially, the distribution area. An UMSUG attendee considered that it was better to have an agreed, standardised system.

- 3.4 ELEXON proposed to add a new, optional, Field 16. This would be specified as six characters (170-175), alphanumeric and text, where:

- The first four characters would be the Distributor's Market Participant ID (MPID); and
- The remaining two characters could be used as agreed between the Customer and IDNO (e.g. to indicate the distribution area).

The UMSUG agreed.

- 3.5 An UMSUG member asked whether the existing text about supporting the old 7-digit Charge Codes could also now be removed from the OID. ELEXON agreed to remove this as part of the redlining.

- 3.6 The Chairman asked what impact the change would have on UMS participants. UMSUG members advised that use of the Standard Inventory Format is optional, in that the Customer and UMSO can agree to use an alternative format. However, changes would be needed to inventory systems if UMSOs and Customers wanted to adopt the new optional field. The Chairman noted that, as a guidance document, the OID does not have a formal consultation process in the same way as the BSCP (which is subject to the CP process). She therefore noted that ELEXON would need the UMSUG's help in publicising the change to UMSOs, Customers and inventory system providers.

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- 3.7 UMSUG members suggested that, as the redlined changes to the OID would be straightforward, the UMSUG could review the redlining by correspondence, publicise it to their contacts and bring any comments to the next UMSUG meeting. ELEXON agreed that this sounded like a pragmatic way forward.

**Action 121/02**

**Action 121/03**

- 3.8 An UMSUG member commented that they believed a further change was needed to the inventory, to identify whether equipment is connected at high or low voltage. The member believed that this was required for Distribution Network Use of System (DUoS) charging as a result of DCP282. An UMSUG attendee commented that a change to the Standard Inventory Format would not be the right mechanism to capture this, since the Customer submits the inventory and would not have this information. The attendee, ELEXON and other UMSUG members also believed that this issue had been considered and resolved as part of DCP282. ELEXON agreed to check separately with the Proposer of DCP282 on whether it required differential charging for low voltage / high voltage connections.

**Action 121/04**

- 3.9 The UMSUG:

- a) **AGREED** that ELEXON will draft changes to the OID and circulate these to the UMSUG by correspondence; and
- b) **AGREED** that UMSUG members will publicise the draft OID changes to UMSOs, Customers and inventory system providers, and bring any comments to the next UMSUG meeting.

## 4. Test report for the OWLET IoT Central Management System – UMSUG121/04

- 4.1 The OWLET Internet of Things (IoT) CMS has passed ELEXON's witness testing. ELEXON invited the UMSUG to recommend its approval to the Supplier Volume Allocation Group (SVG).

- 4.2 UMSUG members had no comments. ELEXON noted that it will therefore present the CMS to the SVG for approval at its meeting on 31 October 2017.

**Action 121/05**

- 4.3 The UMSUG:

- a) **NOTED** that the OWLET IoT CMS passed ELEXON's witness testing; and
- b) **RECOMMENDED** that the SVG approves the OWLET IoT CMS version 3.102.12.17 for use in Settlement.

## 5. Principles for considering Charge Code applications for cabinets and Apparatus with variable load – UMSUG121/05

- 5.1 ELEXON highlighted issues with creating Charge Codes for certain equipment types with variable loads, caused by components such as heaters and fans. It proposed potential solutions to these issues and invited the UMSUG to agree an approach.

- 5.2 ELEXON ran through the possible solutions it had suggested in the paper. An UMSUG attendee advised taking a proportionate approach to the predictability of these elements of equipment, where they are a small proportion of the overall load and do not significantly alter its annual consumption. The Chairman noted that this was in line with the [guidance](#) published by Regulatory Delivery at the Department for Business, Energy & Industrial Strategy (BEIS) on the [Electricity \(Unmetered Supply\) Regulations 2001 \(Statutory Instrument 2001/3263\)](#) ('the SI'), since this states that:

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'In determining if a load meets this criterion NMO encourage a pragmatic approach to equipment which will, for the majority of time, require a constant load but may have small variations in load from time to time that are insignificant in terms of overall kWh consumption taken on an annual basis.'

- 5.3 An UMSUG member commented that there had been a shift from using heaters to using fans. They considered that fans are less load and therefore tend to have a smaller consumption than the 'useful' load.
- 5.4 The Chairman suggested that the onus should be on the applicant to demonstrate the predictability of its equipment's consumption. ELEXON noted the considerable effort it and the UMSUG has spent on recent applications in trying to find an appropriate way forward.
- 5.5 The UMSUG agreed that ELEXON should ask the applicant more targeted questions up front in the application process, including asking the applicant to provide a weighting with justification. ELEXON suggested updating the Charge Code application form to include these questions. An UMSUG attendee also suggested adding further clarification to the testing sections of the OID, for example on the need to measure the heater/fan separately to the other equipment. ELEXON agreed.
- 5.6 ELEXON agreed to bring some draft redlining to the next UMSUG meeting for discussion. Some UMSUG members offered to provide input to ELEXON outside the meeting.

## Action 121/06

- 5.7 ELEXON noted the recent application from Arqiva, which had received significant UMSUG discussion by correspondence. ELEXON asked the UMSUG to confirm if it was now happy for this application to proceed, and UMSUG members confirmed that they were. ELEXON noted that this will therefore be included in MDD version 262 for approval by the SVG on 31 October 2017.
- 5.8 The UMSUG:
- NOTED** the issues identified in the paper;
  - NOTED** ELEXON's proposed solutions; and
  - AGREED** that ELEXON will draft changes to the OID and relevant Charge Code application form, for discussion at the next UMSUG meeting.

## 6. Electric vehicle charging where the Apparatus contains a Meter – UMSUG121/06

- 6.1 ELEXON highlighted issues relating to electric vehicle (EV) charging where the Apparatus contains a Meter. It proposed a way forward and invited the UMSUG to recommend this approach to the SVG.
- 6.2 The UMSUG member from Regulatory Delivery at BEIS advised that its original legal advice was that all EV charging points should be metered. ELEXON noted that, while BEIS's guidance on the SI says this, there appears to be no restriction in the SI itself – which permits a UMS where the consumption is predictable and it is impractical to meter it. The UMSUG member commented that they would want to get further BEIS legal advice.
- 6.3 ELEXON noted that the UMSUG and SVG have already approved an EV charging product as a measured CMS (mCMS) under the UMS arrangements. ELEXON considered that, while this equipment has a 'moveable' meter in the charging cable, it is otherwise not significantly different.
- 6.4 An UMSUG member commented that it would not be a problem to meter these types of charging equipment they were installed in a separate feeder pillar rather than a street light. ELEXON noted that this would undermine the business case. Another UMSUG member advised that, in practice, separate posts might be used to avoid trailing cables across footpaths. However, these would still be fed through the UMS point. The UMSUG member noted that Transport for London was supportive of the technology.

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- 6.5 The UMSUG member from Regulatory Delivery at BEIS noted the barriers to metering outlined in the paper. However, they queried why the products could not be changed to have a readable/accessible Meter and why Distributors could not change their policies.
- 6.6 An UMSUG member suggested that it seemed strange to have both a UMS and a metered supply at the same point.
- 6.7 Various UMSUG members commented that they were generally supportive of using the mCMS arrangements on the basis that the equipment's consumption would be predictable and it appeared impractical to meter it.
- 6.8 Several UMSUG commented on the importance of restricting the circumstances in which the mCMS arrangements could be used for EV charging equipment, to avoid 'scope creep'. Some members expressed concern about other products, for which a UMS would be inappropriate, seeking to piggyback on the arrangements – with one member using the example of a 50kW rapid charger.
- 6.9 ELEXON noted its intention to restrict use of the mCMS arrangements to smaller slow-charging equipment, by including new wording in the OID and mCMS Test Specification (and potentially BSCP520). ELEXON suggested limiting use to residential streets. An UMSUG member noted that the definitions needed to be constructed carefully since, for example, not all residential streets are public highways. However, they were confident that appropriate wording could be established using existing definitions already used elsewhere. They also suggested wording along the lines of 'connected to / fed by existing unmetered street furniture'.
- 6.10 ELEXON agreed to draft redlined changes to the OID and mCMS Test Specification, for discussion at the next UMSUG meeting. Some members volunteered to help ELEXON work up appropriate definitions.

**Action 121/07**

- 6.11 ELEXON noted that each product would still have to prove its predictability by testing under the mCMS arrangements.
- 6.12 An UMSUG member asked if ELEXON could share any further information on one of the products. ELEXON agreed to check with the manufacturer whether they were happy for this to be shared.

**Action 121/08**

- 6.13 The UMSUG agreed that ELEXON should seek the SVG's agreement in principle to the mCMS approach. ELEXON noted that it will do so at the SVG meeting on 31 October 2017. ELEXON and the UMSUG agreed that this agreement in principle is subject to any further BEIS legal advice, the UMSUG's agreement of appropriate definitions, and testing of each application on a case-by-case basis.

**Action 121/09**

- 6.14 The UMSUG:
- a) **NOTED** the issues identified with charging EVs via street lighting columns where the Apparatus contains a Meter; and
  - b) **AGREED** in principle to recommend ELEXON's proposed approach to the SVG, subject to:
    - i) Receiving any subsequent legal advice from BEIS;
    - ii) Agreeing the necessary changes to the OID and mCMS Test Specification at the next UMSUG meeting; and
    - iii) Considering each individual mCMS application against the amended Test Specification on a case-by-case basis.

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## OPEN SESSION – INFORMATION PAPERS

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### 7. Updates to UMSUG Terms of Reference – UMSUG121/07

- 7.1 ELEXON invited the UMSUG to comment on updates to its Terms of Reference, before ELEXON presents these to the SVG for approval.
- 7.2 An UMSUG member asked if the name of the group should be changed to be clearer. The Chairman agreed that the group was really an expert group rather than a user group, so in theory its name could be amended to the Unmetered Supplies Expert Group. However, she noted that UMS participants are familiar with the current name (to the extent that they request 'UMSUG codes') and so queried if a name change might cause more confusion than it solved. She noted that the Terms of Reference are clear on the purpose and role of the group. ELEXON also noted that a separate 'UMSEG' group had existed in the past and so using that name might be confusing.
- 7.3 UMSUG members had no other comments. The Chairman noted that she will take the redlined changes to the SVG for approval on 5 December 2017, to align the timing with similar changes to the Software Technical Advisory Group's (STAG's) Terms of Reference.

**Action 121/10**

- 7.4 The UMSUG:
- a) **NOTED** ELEXON's proposed updates to the UMSUG's Terms of Reference.

### 8. UMSUG meeting dates for 2018 – UMSUG121/08

- 8.1 ELEXON invited the UMSUG to note its indicative meeting dates for 2018.
- 8.2 UMSUG members had no comments. ELEXON noted that it will publish the dates on the BSC Website.
- 8.3 The UMSUG:
- a) **NOTED** the indicative UMSUG meeting dates for 2018.

## OPEN SESSION – UPDATES

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### 9. Update on implementation of Burn Hours review

- 9.1 ELEXON informed the UMSUG that all the outstanding actions have been completed. It advised that it will tidy up the Switch Regime calculation tool and make it available to UMSUG members through the BSC Website.
- 9.2 An UMSUG member requested that ELEXON makes the data entry clear, for example through cell validation.

**Action 121/11**

- 9.3 The UMSUG:
- a) **NOTED** the update.

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## 10. Ofgem's mandatory Half Hourly Settlement SCR and UMS

- 10.1 ELEXON informed the UMSUG that it has been asked by Ofgem to develop the Target Operating Model for the Market-Wide Half Hourly Settlement Significant Code Review (SCR), previously known as the Mandatory Half Hourly Settlement SCR, which now also includes UMS. In addition, it has created a web page for the new [Design Working Group](#).
- 10.2 ELEXON noted that it will continue to update the UMSUG on any UMS aspects of the SCR as it progresses.
- 10.3 The UMSUG:
  - a) **NOTED** the update.

## OPEN SESSION – OTHER BUSINESS

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### 11. Actions

- 11.1 **Action 118/02** – Closed. The SVG approved Ubitricity's application for an mCMS on 4 April 2017.
- 11.2 **Action 118/03** – Closed. ELEXON presented the Burn Hours review results at UMSUG120.
- 11.3 **Action 118/04** – Ongoing. Dave Johnson hopes to have an update from LANTERNS by the next UMSUG meeting. To be kept open until UMSUG122.
- 11.4 **Action 118/05** – Covered by Item 1 above.
- 11.5 **Action 118/08** – Closed. ELEXON has made several attempts to contact ARTSM since this action was taken a year ago, but has received no response. The invitation remains open.
- 11.6 **Action 118/10** – Closed. ELEXON has not been able to identify any improvements to the existing wording.
- 11.7 **Action 118/11** – Closed. ELEXON has made several attempts to contact ARTSM since this action was taken a year ago, but has received no response. The invitation remains open.
- 11.8 **Action 119/01** – Closed. ELEXON presented the latest mCMS Test Specification at UMSUG120.
- 11.9 **Action 119/02** – Closed. The SVG approved the OID changes on 28 February 2017.
- 11.10 **Action 119/03** – Closed. Information provided by Barry Dockney at UMSUG120.

### 12. Matters arising

- 12.1 An UMSUG attendee raised a potential issue related to existing Charge Codes for traffic signals, where many Charge Codes have nominal watts that are equal to the circuit watts. They advised that the circuit watts should normally be higher than the nominal watts. They considered that some existing Charge Code values for traffic signals also appear high. ELEXON noted that some of these codes were constructed as far back as 2008 and that the UMSUG would have reviewed them all at the time.
- 12.2 The UMSUG attendee also noted that some existing miscellaneous Charge Codes are displaying as decimals when they should be whole numbers.
- 12.3 ELEXON asked the attendee to provide a list of existing traffic signals and miscellaneous Charge Codes that look to be obviously incorrect, focusing on the most recent codes first.

**Action 121/12**
- 12.4 ELEXON agreed to work through the Charge Codes identified and, where there is sufficient information to determine whether these are incorrect, correct them on an opportune basis. It noted that, for very old codes, it may no longer have the original application details to hand.

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## Action 121/13

12.5 An UMSUG member asked what the process is for removing Charge Codes. ELEXON advised that they are end dated if they become obsolete, but are not deleted.

### 13. Next meeting

13.1 The next UMSUG meeting will be held on 16 January 2018, subject to the level of business and the SVG's agreement.