

**PUBLIC**

P366 'Change to Supplier Charge SP08a calculations to account for small scale non domestic Non Half Hourly hard-to read Meters'

## Business Requirements

1 February 2019

## Document history

Date	Version	Author	Reviewers	Description
21/08/2018	0.1	Colin Berry	Chris Wood, Paulina Stelmach	Initial Draft
28/08/2018	0.2	Colin Berry	John Lucas	Peer Review
28/09/2018	0.3	Colin Berry	P366 Work Group	Second draft following peer review – for Workgroup review
28/09/2018	0.4	Colin Berry	Chris Wood	
08/10/2018	0.5	Colin Berry	Chris Wood	Updated following Workgroup review
29/11/2018	0.6	Chris Wood	Colin Berry, Sam Daoudi	Update following Workgroup and refinement of solution
06/12/2018	0.7	Colin Berry	Chris Wood	More detail added prior to consultation
06/12/2018	0.8	Chris Wood	Colin Berry	Comments on v0.7 added
07/12/2018	0.9	Colin Berry	Justin Andrews, Lawrence Jones	Updated after discussion on v0.8
11/12/2018	0.10	Colin Berry	Justin Andrews	Updated to include review comments
13/12/2018	0.11	Colin Berry	P366 Work Group	Updated to include further review comments
1/2/2019	0.12	Chris Wood	Colin Berry, John Lucas	Updated to include Proposer's HTR Criteria

## Approvals

Date	Version	Name	Role	Status
1/2/2019	1.0	Justin Andrews	ELEXON Head of Design Authority	Finalised document for publication

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## 1. INTRODUCTION

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### 1.2 Purpose of document

This document contains the Business Requirements (BRs) for Balancing and Settlement Code (BSC) Modification [P366 'Change to Supplier Charge SP08a for hard-to-read sites'](#). It will form the basis on which ELEXON:

- i) procures high-level Impact Assessments, with approximate costs and timescales, from its Service Providers;
- ii) identifies the impact on its processes;
- iii) initiates the industry Consultation;
- iv) captures any changes to the BRs; and
- v) develops more detailed Solution Requirements, which will be used to procure a Detailed Level Impact Assessment from its Service Providers. This will have firm costs and timescales, and will be the basis for the design of the P366 solution.

A Glossary of Terms is included as an Appendix A to this document.

### 1.3 Background

When P366 was raised, it sought to correct a defect the proposer believes is in the current BSC arrangements:

*Supplier Charges for Performance Assurance Reporting and Monitoring Service (PARMS) Serial SP08a<sup>1</sup> are being applied to Suppliers where there is limited practical possibility of obtaining a Meter reading due to reasons beyond the Supplier's control. Due to the nature of the Non Half Hourly (NHH) performance requirements, small Suppliers are most susceptible to Hard to Read (HTR) related SP08a Supplier Charges. They are unfairly disadvantaged and are less able to compete for customers with HTR sites. This is because in contrast to large Suppliers, , who have a large portfolio of customers, small Suppliers are not able to absorb HTR sites into their Settlement performance, and therefore means that they must price the SP08a cost into their Supply contract, which makes their prices less competitive. In short, P366 seeks to remove the SP08a Supplier Charges derived from HTR sites.*

P366 seeks to address this defect by establishing:

- A set of criteria which, if met, would allow a Supplier to declare a Metering System 'Hard to Read'; and
- A process whereby a HTR Metering System is excluded from the calculation of Supplier Charges for Serial SP08a.

### 1.4 Scope of P366

At the third P366 Workgroup on 22 November 2018, the Proposer decided on the scope of the P366 Proposed solution and the Workgroup identified a P366 Alternative Modification solution.

#### 1.4.1 P366 Proposed requirements

The P366 Proposed Business Requirements are comprised of three elements:

- 1) Develop HTR criteria to allow a Supplier to ascertain whether a Metering System is Hard to Read (HTR);
- 2) Develop a method for a Supplier to declare a Metering System as HTR; and
- 3) Develop a process to exclude a HTR Metering System's energy volumes from the calculation of Supplier Charges for PARMS Serial SP08a.

#### 1.4.2 P366 Alternative requirements

The P366 Alternative Business Requirement is:

- 1) Set the SP08a Supplier Charge to £0.00 for all Suppliers, in PARMS.

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<sup>1</sup> SP08a requires that each Supplier settles at least 97% of its NHH energy on Annualised Advances.

Note that the P366 Alternative does not require the development of HTR Criteria.

## **1.5 P366 Proposed Requirements - Summary**

### **1.5.1 HTR criteria**

The proposer's criteria for a HTR Metering System are:

- 1) the Metering System must be unoccupied; and
- 2) the Metering System must be at a geographically remote location; and
- 3) It must not be possible to establish communications with the Metering System for remote monitoring.

### **1.5.2 Supplier declaration of a HTR Metering System**

If a Supplier is satisfied that a Metering System meets all of the HTR criteria, and wishes to declare it as a HTR Metering System it shall inform the Non Half Hourly Data Aggregator NHHDA for that Metering System and copy BSCCo.

### **1.5.3 Exclusion of HTR Metering Systems from SP08a Supplier Charges calculation**

The exclusion of HTR Metering Systems from SP08a Supplier Charges calculation shall be delivered through changes to Non Half Hourly Data Aggregators (NHHDA) shall:

- assign HTR status to each specified Metering System declared as such by a Suppliers; and
- Calculate:
  - the 'Supplier Purchase Matrix (SPM) HTR Estimated Annual Consumption (EAC)' as the proportion of the 'SPM Total EAC' relating to HTR Metering systems;
  - the 'SPM Total EAC HTR MSID Count' as the proportion of the 'SPM Total EAC MSID Count' relating to HTR Metering systems; and
- include the 'SPM HTR EAC' and the 'SPM Total EAC HTR MSID Count' in a new version of the D0041 ('Supplier Purchase Matrix') DTC data flow;

The Supplier Volume Allocation Agent (SVAA) shall:

- apply Line Loss Factors (LLFs) and profiling to the SPM HTR EACs to create the 'Total HTR EAC Energy'; and
- include the 'Total HTR EAC Energy' and 'Total HTR EAC MSID Count' in a new version of the P0145 ('SP08 – Energy and MSIDs on Actuals') data flow.

PARMS shall:

- Amend the calculation of the Supplier Charges for PARMS Serial SP08a to exclude 'Total HTR EAC Energy'.

## **1.6 P366 Alternative Requirements - Summary**

The Business Requirement for alternative Systems process for P366 Alternative is through PARMS, where:

- SP08a Supplier Charge shall be set to £0.00/MWh for all Suppliers.

## 2. BUSINESS REQUIREMENTS

### 2.1 P366 Proposed Business Requirements

The following parties and systems will be impacted by the P366 proposed solution requirements:

- Suppliers;
- NHHDA's;
- SVAA;
- PARMS; and
- BSCCo

#### BR1 –HTR criteria

The term hard-to-read (HTR) Metering System shall mean any Metering Systems that are located at a Customer's site that is 'Unoccupied' and 'Remote' and has a 'Lack of Communications'. All of these criteria must be met for a Metering System to be considered as HTR.	
1.1	<p>'Unoccupied' shall mean:</p> <ul style="list-style-type: none"><li>• The Customer (or their duly appointed representative) is not normally present at the site where the Metering System is located; and</li><li>• The site is not visited as regular business activities; and</li><li>• The Customer has affirmed that they will not facilitate temporary occupation of the site where the Metering System is located in order to facilitate a Meter read; and</li><li>• It shall not be possible to achieve a Meter read from the Metering System unless the site is occupied either permanently or on a temporary basis</li></ul>
1.2	<p>'Remote' shall mean that any potential visitors to the site at which the Metering System is located would have to make a specific effort or arrangement, outside their normal business activities, to visit that site.</p>
1.3	<p>'Lack of Communications' shall mean:</p> <ul style="list-style-type: none"><li>• The location of the Metering System being outside of mobile telecommunication coverage areas for all types of mobile telecommunications; and</li><li>• The owner of the site at which the Metering System is located has made a positive affirmation that access will not be granted to allow installation of communications equipment; and</li><li>• The Customer (if different from the Site owner) has made a positive affirmation that they will not facilitate the establishment of communications with the Metering System.</li></ul>

#### BR2 – Declaration of HTR Metering Sites

If a Supplier is satisfied that a Metering System meets the HTR Criteria developed in accordance with BR1, it may declare the Metering System as HTR. There is no obligation on a Supplier to declare a Metering System as HTR.	
2.1	If a Supplier wishes to declare a Metering System as HTR, it must first ascertain whether that Metering System meets the HTR Criteria.
2.2	If a Supplier is satisfied that a Metering System meets the HTR Metering System criteria, <b>and</b> wishes to declare it as a HTR Metering System, they should notify the NHHDA for that Metering System and BSCCo that the Metering System they are declaring that Metering System as HTR.
2.3	This notification should be effected through a 'P-flow'. <i>It should not be effected via a D-flow, as the associated cost would be an unnecessary overhead.</i>
2.4	The Supplier must provide any supporting evidence for the Metering System being HTR that is required by the HTR Criteria to ELEXON or the BSC Auditor on request.
<b>BR3 – Development and maintenance of a HTR Metering Systems Register</b>	
3.1	BSCCo shall develop and maintain a register of all HTR Metering Systems declared, including the following items: <ul style="list-style-type: none"> <li>• Metering System Identifier (MSID);</li> <li>• Supplier;</li> <li>• NHHDA;</li> <li>• HTR Effective From Date;</li> <li>• HTR Effective To Date;</li> <li>• Supporting information<sup>2</sup><b>Error! Bookmark not defined.</b>; and</li> <li>• Reason for removal of HTR status.</li> </ul>
3.2	On the declaration of HTR status for a HTR Metering System, BSCCo may, at its own discretion, use the processes developed in accordance with BR9 to establish the veracity of the declaration.
3.3	BSCCo may deny HTR status for a Metering System, if action taken pursuant to BR 3.2 identifies that that Metering System has not met the HTR criteria.
3.4	At any time following notification of a HTR Metering System (unless the Supplier has subsequently declared that that Metering System is no longer HTR), BSCCo may, at its own discretion, make use of any relevant Performance Assurance Technique to establish whether the Metering System still meets the HTR Criteria.
3.5	BSCCo may revoke HTR status for a Metering System, if any action taken pursuant to BR 3.4 identifies that that Metering System has not met the HTR criteria.
3.6	If a Supplier becomes aware that a Metering System previously declared as HTR no longer meets the HTR criteria, it shall notify the NHHDA and BSCCo via a P-flow that the Metering System is no longer HTR.
3.7	If BSCCo is notified, or otherwise becomes aware, and is subsequently satisfied that a Metering System previously declared as HTR no longer meets the HTR criteria, it shall update HTR Metering Systems Register to show that the Metering System is no longer HTR.

<sup>2</sup> Not mandatory

	Where BSCCo has not been notified by the Supplier, it will inform the Supplier that the Metering System is no longer HTR.
3.8	<p>On a Change of Supplier, a Metering System shall not retain HTR status.</p> <p>BSCCo shall update the HTR Metering Systems Register to add the HTR Effective To Date and the Reason for removal of HTR status.</p> <p>For the avoidance of doubt, if the new Supplier wishes to declare any Metering System as HTR, including any that the old Supplier had successfully declared as HTR, they should follow the process for BR2.</p>
3.9	The old Supplier will not be required to inform the new Supplier that they have declared a Metering System as HTR but, may do so if they wish (and by whatever means they feel appropriate, e.g. email).
3.10	<p>On a change of NHHDA, HTR status shall be retained, subject to the following actions:</p> <ul style="list-style-type: none"> <li>• The Supplier shall notify the new NHHDA and BSCCo of each HTR Metering System in its portfolio applicable to that NHHDA; and</li> <li>• BSCCo shall update the NHHDA for each relevant Metering System in the HTR Metering System Register.</li> </ul>

#### BR4 –NHHDA software requirements

Amended NHHDA software must be able to:

4.1	Allow the identification of any Metering System as HTR by means of a HTR Effective From Date.
4.2	Allow the identification of any Metering System as no longer HTR by means of a HTR Effective To Date.
4.3	<p>For each combination of Supplier and Settlement Class (i.e. Line Loss Factor Class, GSP Group and Valid Measurement Requirement Profile Class), the NHHDA shall calculate and store:</p> <ul style="list-style-type: none"> <li>• The Total HTR EAC (THTREAC<sub>HZLPR</sub>), defined as the total EAC value (including Default EAC values where applicable) that was included in the Total Metered EAC (TMEAC<sub>HZLPR</sub>) for Metering Systems declared as HTR on the Settlement Date in question;</li> <li>• The Total HTR EAC MSID Count, defined as the number of Metering Systems included in the Total Metered EAC (TMEAC<sub>HZLPR</sub>) that were declared as HTR on the Settlement Date in question</li> </ul> <p><i>For the avoidance of doubt, this is in addition to existing EAC calculations – HTR EACs shall not be excluded from existing EAC calculations.</i></p>
4.4	A Metering System shall not be treated as HTR for any Settlement Days outside of the date range for which that Metering System had HTR status.
4.5	Create a new version of the D0041 (Supplier Purchase Matrix) file to include the Total HTR EAC and the Total HTR EAC MSID Count. See Appendix B for the proposed revised structure of the D0041.
4.6	Issue the new version of the D0041 to the SVAA in accordance with the Settlement Calendar as per



	existing rules and process.
4.7	BSCP505 'Non Half Hourly Data Aggregation' will be amended to include relevant obligations of NHHDA's.

## BR5 –SVAA requirements

SVAA will be required to:

5.1	Load the new version of the D0041 received from NHHDA's.
5.2	For each Settlement Day for which (according to the Settlement Calendar) a Volume Allocation Run is required, calculate and store the Total HTR EAC Energy (HTRE <sub>HZ</sub> ) as: $HTRE_{HZ} = \sum_j \sum_{LPR} (THTREAC_{HZLPR} * PPCC_{HPRj} * LLF_{Lj})$
5.3	Create a new version of the P0145 (SP08 - Energy and MSIDs on Actuals) data flow to include <input type="checkbox"/> Total HTR EAC Energy (HTRE <sub>HZ</sub> ) and the Total HTR EAC MSID Count. See Appendix C for the proposed revised structure of the P0145.
5.4	Issue the new version of the P0145 data flow to PARMS in accordance with existing timetable and process.
5.5	BSCP508 Supplier Volume Allocation Agent' will be amended to include the requirements of BR5 on the SVAA.

## BR6 –PARMS requirements

PARMS to:

6.1	Load the new version of the P0145 data flow received from the SVAA.
6.2	For purposes of calculating Supplier Charges, PARMS shall calculate an alternative value of the SP08A Serial that excludes the Total HTR EAC Energy. This value shall be calculated in accordance with Section 2.2.2 of Annex S-1, but excluding the Total HTR EAC Energy i.e. using (E <sub>HZ</sub> – HTRE <sub>HZ</sub> ) in place of E <sub>HZ</sub> . For the avoidance of doubt this value is only to be used for the purpose of calculating Supplier Charges, and the normal value (including HTR EACs) will continue to be reported.  PARMS shall exclude HTR EACs from the calculation of SP08A Supplier Charges (described in Section 3.2.2 of Annex S-1), that is: <ul style="list-style-type: none"> <li>• Using (E<sub>HZ</sub> – HTRE<sub>HZ</sub>) rather than E<sub>HZ</sub> in the calculation of NHHEA; and</li> <li>• Using the value of the SP08A Serial that excludes HTR EACs in the calculation of p.</li> </ul>
6.3	BPSP533 PARMS Data Provision, Reporting And Publication Of Peer Comparison Data and / or any of its Appendices will be amended to include the requirements of BR6.

## BR7 – Development of new and amended data flows

BSCCo shall develop new and amended dataflows to facilitate the delivery of this solution

7.1	<p>Amend the definition of the D0041 ("Supplier Purchase Matrix") data flow to include</p> <ul style="list-style-type: none"><li>• Total HTR EAC; and</li><li>• Total HTR EAC MSID Count.</li></ul> <p>See Appendix B for the proposed revised structure of the D0041.</p> <p>Note that a DTC Change Proposal will be required to effect this change.</p>
7.2	<p>Amend the definition of the P0145 (SP08 - Energy and MSIDs on Actuals) data flow in BSCP533 Appendix 1 PARMS Data Provider File Formats to include:</p> <ul style="list-style-type: none"><li>• Total HTR EAC Energy (HTREHZ); and</li><li>• Total HTR EAC MSID Count.</li></ul> <p>See Appendix C for the proposed revised structure of the P0145.</p>
7.2	<p>Create a new P-flow<sup>3</sup> shall be created to allow Suppliers to inform NHHDA as BSCCo when a Metering System is declared as HTR and when a Metering System is no longer HTR.</p> <p>This new P-flow, which shall take the form of an email, will be added to the SVA Data Catalogue.</p>

## BR8 – NHHDA's

NHHDA's will be required to:

8.1	Where a NHHDA has been notified that a Metering System is HTR, it set the HTR Effective From Date as the current date, using the functionality introduced into the NHHDA software under BR 4.1.
8.2	Where a NHHDA has been notified that a Metering System should not be considered HTR, either by BSCCo in accordance with BR3.3 or BR3.5, or by the Supplier in accordance with BR3.6, it shall set the HTR Effective To Date as the current date, using the functionality introduced into the NHHDA software under BR 4.1.
8.3	BSCP505 shall be amended to place the requirements BR4 on NHHDA's.

## BR9 – Verification of HTR Declarations

BSCCo shall develop processes for the verification of HTR Declarations

<sup>3</sup> a data flow will not be included in the DTC or be sent across the Data Transfer Network.

9.1	<p>BSCCO shall develop processes to verify HTR Declarations in accordance with BR3.2, which may include, but not be limited to, the following:</p> <ul style="list-style-type: none"><li>a) Following a Supplier's declaration that a Metering System is HTR, BSCCo shall verify the identity of the Metering System and identify whether there is any reason known to BSCCo that the Metering System should not be declared HTR;</li><li>b) As part of subsequent checks; and</li><li>c) As part of the annual BSC Audit.</li></ul>
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## 2.2 P366 Alternative Business Requirements

The following parties, documentation, processes and systems will be impacted by the P336 proposed solution requirements:

- PARMS

BR10 – The Supplier Charges for SP08a shall be set to £0.00/MWh													
The Supplier Charges for serial SP08a shall be set to £0.00/MWh for all Suppliers													
10.1	<p>Amend BSC Section S, Annex S-1, paragraph 3.2.1 as follows:</p> <p>3.2.1 A Supplier who fails to comply with Serial SP08a shall be liable to the charge set out in the table below against the relevant item in Serial SP08a:</p> <table><tr><th>Item in Serial SP08a (as referred to in the table in paragraph 2.2.1)</th><th>Amount per Chargeable MWh</th></tr><tr><td>Initial Volume Allocation Run</td><td>No Charge</td></tr><tr><td>First Reconciliation Volume Allocation Run</td><td>No Charge</td></tr><tr><td>Second Reconciliation Volume Allocation Run</td><td>No Charge</td></tr><tr><td>Third Reconciliation Volume Allocation Run</td><td><u>No Charge</u></td></tr><tr><td>Final Reconciliation Volume Allocation Run</td><td><u>No Charge</u></td></tr></table>	Item in Serial SP08a (as referred to in the table in paragraph 2.2.1)	Amount per Chargeable MWh	Initial Volume Allocation Run	No Charge	First Reconciliation Volume Allocation Run	No Charge	Second Reconciliation Volume Allocation Run	No Charge	Third Reconciliation Volume Allocation Run	<u>No Charge</u>	Final Reconciliation Volume Allocation Run	<u>No Charge</u>
Item in Serial SP08a (as referred to in the table in paragraph 2.2.1)	Amount per Chargeable MWh												
Initial Volume Allocation Run	No Charge												
First Reconciliation Volume Allocation Run	No Charge												
Second Reconciliation Volume Allocation Run	No Charge												
Third Reconciliation Volume Allocation Run	<u>No Charge</u>												
Final Reconciliation Volume Allocation Run	<u>No Charge</u>												
10.2	Amend PARMS to set the Supplier Charges for SP08a to £0.00/MWh for all Reconciliation Volume Allocation Runs.												

## APPENDIX A – GLOSSARY OF TERMS

Term	Description
Balancing & Settlement Code (BSC)	An industry code that various types of company involved in the generation, distribution or consumption of electricity must be a signatory to and abide as required by their Licence, which specifically concerns the Balancing and Settlement activity in Great Britain.
BSC Company (BSCCo)	BSC Section X-1: means ELEXON Limited (or any successor to that company acting in the capacity as BSCCo).
Business Day/ Working Day	Is a day (other than a Saturday or a Sunday) on which banks are open in London for general interbank business in Sterling and, in relation to payment in euro, any such day when in addition the Trans European Automated Real-time Gross Settlement Express Transfer System is operating
Business Hours	Means, unless otherwise expressly stated, the period 0900 to 1700 on a Business Day
CP	Change Proposal
Customer	A person to whom electrical power is provided, whether or not that person is the provider of that electrical power; and where that electrical power is measured by a Metering System;
Data Catalogue	Is a document (or combination of documents) of that title, containing a catalogue of certain Communications, specifying for each such Communication: <ul style="list-style-type: none"> <li>• The definition of the data items in the Communication;</li> <li>• The format of the Communication;</li> <li>• In certain cases, the Communications Medium or alternative Communications Medium by which such Communication may be sent; and</li> <li>• Any other requirements as to the form of the Communication.</li> </ul>
DTC	Data Transfer Catalogue
DTN	Data Transfer Network – the medium for the delivery of Data Transfer Catalogue dataflows (D-flows)
Dxxxx or D-flow	Is a Data Flow specified Data Transfer Catalogue and listed in the SVA Data Catalogue which shall be sent across the DTN
EAC	Estimated Annual Consumption (for a Metering System)
MSID	Metering System Identifier
Non Half Hourly Data Aggregator (NHHDA)	BSC Section X-1: means a Data Aggregator which carries out the aggregation of metering data received from Non Half Hourly Data Collectors.
PARMS	Performance Assurance Reporting and Monitoring System
Pxxxx or P-flow	Is a data flow specified in the SVA Data Catalogue but not specified in the Data Transfer Catalogue which may be sent as an attachment to an email or by any medium agreed by the sender and the recipient.
SVAA	Supplier Volume Allocation Agent

## APPENDIX B – PROPOSED REVISED D0041 STRUCTURE

Group	Group Description	Range	Condition	L1	L2	L3	L4	L5	L6	L7	L8	Item Name
ZPD	Data File Additional Header	1		G								
					1							Settlement Date
					1							Settlement Code
					1							Run Type Code
					1							Run Number
					1							GSP Group
SUP	Supplier Details	0-*		G								
					1							Supplier Id
SPM	Supplier Purchase Matrix Details	1-*		G								
						1						Profile Class Id
						1						Distributor Id
						1						Line Loss Factor Class Id
						1						Standard Settlement Configuration Id
						1						Time Pattern Regime
						1						SPM Default EAC MSID Count
						1						SPM Default Unmetered MSID Count
						1						SPM Total AA MSID Count
						1						SPM Total Annualised Advance
						1						SPM Total EAC
						1						SPM Total EAC MSID Count
						1						SPM Total Unmetered Consumption
						1						SPM Total Unmetered MSID Count
						<u>1</u>						<u>SPM Total HTR EAC</u>
						<u>1</u>						<u>SPM HTR Default EAC MSID Count</u>

## APPENDIX C – PROPOSED REVISED P0145 STRUCTURE

ZHD - File Header			
Field	Field Name	Type	Comments
1	Record Type	text(3)	= ZHD
2	File Type	text(8)	= P0145002
3	From Role Code	text(1)	= G (SVAA)
4	From Participant Id	text(4)	= CAPG
5	To Role Code	text(1)	= Z (Non-Core – PARMS)
6	To Participant Id	text(4)	= POOL
7	Creation Time	date/time	Date & time of file generation
SUB – Subject Participant Header			
Field	Field Name	Type	Comments
1	Record Type	text(3)	= SUB
2	Market Sector	text(1)	= B (indicates HH and NHH data)
3	Market Participant Role Code	text(1)	= X (Supplier)
4	Market Participant Id	text(4)	ID of Supplier
5	Period End Date	date	Date of last day of calendar month
6	Periodicity	text(1)	‘M’onthly
SP8 Supplier Serial 8 Data			
Field	Field Name	Type	Comments
1	Record Type	text(3)	= SP8
2	Settlement Day	date	
3	Settlement Type	text(2)	SF, R1, R2, R3 and RF run types
4	GSP Group Id	text(2)	
5	% NHH Energy Aggregated on Actuals	dec(4,1)	The type ‘dec 4,1’ allows for percentage values up to, and including, 999.9% in this data field
6	% NHH MSIDs Aggregated on Actuals	dec(4,1)	
7	Total Actual NHH Energy	dec(10,2)	
8	Total NHH Energy	dec(10,2)	
9	% non-100kW HH Energy Aggregated on Actuals	dec(4,1)	The type ‘dec 4,1’ allows for percentage values up to, and including, 999.9% in this data field

10	% non-100kW HH MSIDs Aggregated on Actuals	dec(4,1)	
11	Total Actual non-100kW HH Energy	dec(10,2)	
12	Total non-100kW HH Energy	dec(10,2)	
13	% 100kW HH Energy Aggregated on Actuals	dec(4,1)	The type 'dec 4,1' allows for percentage values up to, and including, 999.9% in this data field
14	% 100kW HH MSIDs Aggregated on Actuals	dec(4,1)	
15	Total Actual 100kW HH Energy	dec(10,2)	
16	Total 100kW HH Energy	dec(10,2)	
<u>17</u>	<u>Total HTR NHH Energy</u>	<u>dec(10,2)</u>	
<u>18</u>	<u>Total HTR EAC MSID Count</u>	<u>Char(4)</u>	



