

Public

P375 'Metering behind the Boundary Point'

Workgroup 5

20 August 2019

ELEXON

Health & Safety

In case of an emergency

An alarm will sound to alert you. The alarm is tested for fifteen seconds every Wednesday at 9.20am

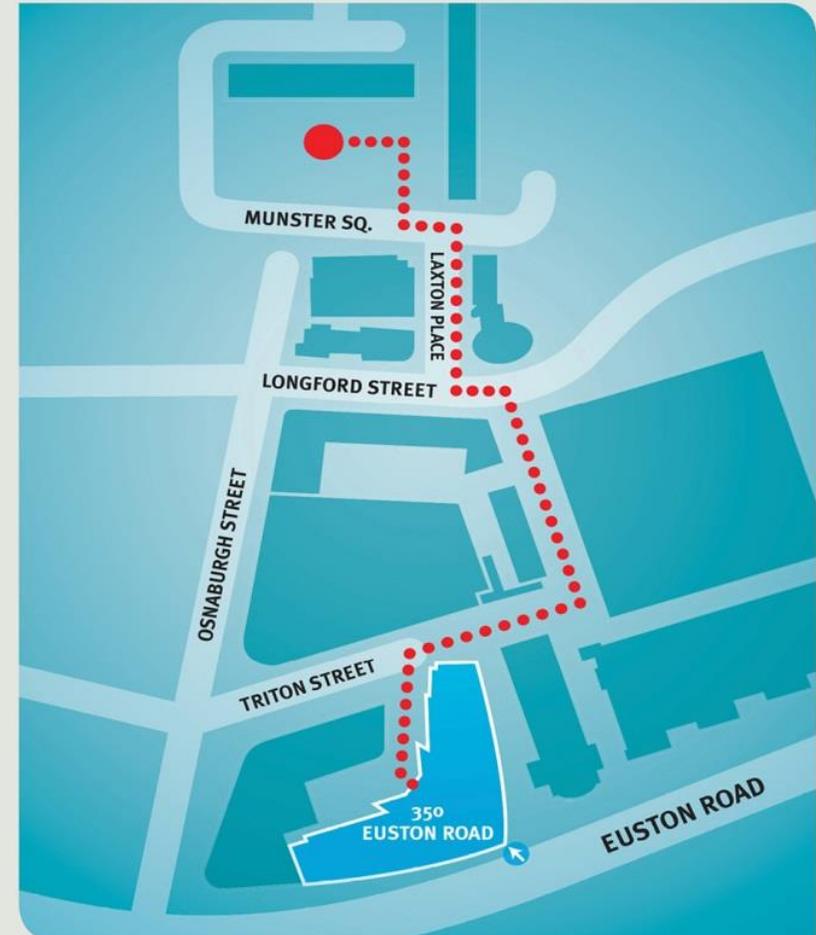
Evacuating 350 Euston Road

- If you discover a fire, operate one of the fire alarms next to the four emergency exits.
- Please do not tackle a fire yourself.
- If you hear the alarm, please leave the building immediately.
- Evacuate by the nearest signposted fire exit and walk to the assembly point.
- Please remain with a member of ELEXON staff and await further instructions from a Fire Warden.
- For visitors unable to use stairs, a Fire Warden will guide you to a refuge point and let the fire brigade know where you are.

When evacuating please remember

- Do not use the lifts.
- Do not re-enter the building until the all clear has been given by the Fire Warden or ground floor security.

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Agenda

- Review Meeting 4 Summary and Actions
- Use case presentation
- Review Workgroup comments P375 business requirements
- Review Workgroup comments P375 Asset Metering Code of Practice 11
- Draft consultation questions
- Next steps

Objective

- Agree and finalise P375 solution for:
 - Business requirements
 - Asset Metering Code of Practice 11
 - Identify and define P375 consultation questions



P375 Meeting 4 Summary and Actions

Meeting 4 Summary (1 of 2)

- Workgroup agreed:
 - That there should be a size threshold for appointment of **MOPs**: where the capacity of the circuit that is being metered would require **COP3** metering (broadly used by I&C sites)
 - For sites where the capacity of the circuit that is being metered would require **COP3** metering and above, the **VLP** can choose to be the **MOP** (by completing BSCP537) or appoint a **MOP**
 - That the Modification can be future-proofed by including recognised standards (e.g. IEC, CE) in the new **COP11**, and the minimum requirements of functionality for the new meters or metering systems being approved in **BSCP601**
- Agreed on the concept of '**MOP Lite**' for **Metering below COP3** standards
 - VLPs ultimately responsible for the metering and data into Settlement

Meeting 4 Summary (2 of 2)

- ELEXON presented scenarios with a use case that explained the new processes for Settlement (P375 as compared with P344)
- ELEXON presented scenarios with a use case for subtracting Asset Metered equipment
- The Workgroup agreed
 - **Zero, one or many VLPs** can use Asset MSIDs (**AMSIDs**) to meter individual parts of the site
 - **Zero or one VLP** can use the **Boundary Point MSID Pair(s)**. Their **Secondary BM Unit Demand Volume** will be calculated using the **Boundary Point MSID Pair(s)**, less any **AMSIDs** used by other **VLPs**, **less zero or more other AMSIDs** (representing assets that no **VLP** wants in their **BM Unit**)
- ELEXON presented the most appropriate assurance frameworks for P375, and a risk register for **VLPs** is in development
 - ELEXON presented a statistical technique for asset load independence
 - The Workgroup agreed this can be used as part of a **PAF** tool



Actions from Workgroup 4

No	Action	Action on	Update
1.	ELEXON to consider customer consent model for P375 For complex arrangements such as multiple Boundary Points for one site and private wire networks How SVAA shares information about other VLPs and Suppliers	ELEXON	Using customer consent flags as designed in P344 (captured in business requirements) i.e. at MSID level
2.	ELEXON to produce a finalised draft of Business Requirements to be sent out for the Workgroup to review no later than two weeks before the next Workgroup (for final Workgroup review)	ELEXON	Sent two weeks before WG5 / WG5 review
3.	ELEXON to send a finalised draft of Asset Metering Code of Practice 11 for Workgroup to review no later than two weeks before the next Workgroup (for final Workgroup review)	ELEXON	Sent two weeks before WG5 / WG5 review



P375
Use Case
Domestic scale
Asset Metering



P375
Business Requirements
Workgroup review

P375 Business Requirements Review Comments

- [Review folder](#)

Section	Para	Comment	ELEXON Response
Assumptions	3.2.5	<p>If adopted, this approach may lead to AMSIDs clashing with dummy MSIDs already used by HHDCs/MOAs for other none Settlement related purposes, for example we as MOP and HHDC have many 10s of thousands of sub-meters where we use an identifier like an MPAN with a 2 digit prefix to denote the geographical area, for example 8000010150424 tells us it is in Eastern GSP. This could cause problems for other Agents.</p>	<p>We are suggesting existing MSID format to fit existing DTN flows with little or no changes. Perhaps it is worth investigating whether there are any codes that are not used by anyone? We will create a consultation question to investigate.</p>
Assumptions	3.2.13 and 3.2.15	<p>Given this to be the case, then under 3.2.15 a HHDC may accept an appointment for a site but have no approved protocol to dial it. Although this is currently the case under the current SVA arrangements, the chance of a new type of device being installed is much higher for these AMSID, has this been considered?</p>	<p>Yes – that is why the process will require for a VLP/MOA to eventually prove that the Asset Meter is COP approved. It will not have an impact on the Settlement (measurement of data) as BP has to be COP compliant and will capture all flows to and from. If a HHDC cannot dial in the Asset Meter, then it will be in VLPs interest to fix the issue, otherwise they will be penalised by non-delivery charges.</p>

BR document comments

Section	Para	Comment	ELEXON Response
Business Requirements	BR7	If we are following BSCP502.3.2 for the appointment of the HHDC, I find it difficult to know what the difference might be between an MOA and an Asset Meter MOP, do you know what the role of an Asset Meter MOP is yet and how it differs?	We will define the role of MOA alternative as a part of legal text drafting. It will fulfil the same role and have the same responsibilities (high-level) but will not be BSC Qualified.
Business Requirements	BR29	I assume a new data flow will be defined to cover the transfer of metered data from HHDC to SVAA? Will this be something like a D0036 or D0275? I notice a new data item of Volume Allocation Run, not something that HHDCs have previously had to worry about.	We initially wanted to receive the 'Volume Allocation Run' data item, however we believe that the industry would benefit if we could repurpose D0036 (meaning SVA will have to determine VAR). We are discussing internally and will get back to the workgroup once agreed.
Business Requirements	BR29	There is no current requirement for HHDCs to collect data every day, BSCP502.3.4.1.1 states data should be collected 'As appropriate', also 3.4.1.12 states consumption data should be submitted 'prior to next Volume Allocation Run' – some HHDCs only dial sites weekly based on contractual requirements agreed with the Supplier.	According to P375 solution, SVAA will perform the aggregation in line with the SVAA calendar. Weekly data provision means that for some AMSIDs the data will not be there in time for II run, leading to VLP being potentially exposed to non-delivery charged. We seek Workgroup's view on the issue.

BR document comments

Section	Para	Comment	ELEXON Response
Business Requirements	BR29	Would the HHDC be expected to submit the same data to the appointee (the VLP I guess), would this be mandatory or a contractual arrangement?	We do not foresaw sending 'raw' Metered Data to the VLP. Rather, SVAA would send loss adjusted data to the VLP. However, should they wish to do so, VLPs could request HHDCs to provide that data.
Business Requirements	BR29	I assume HHDCs would follow BSCP502 for validation and estimation of data, and for reporting of faults as far as possible? Some of the estimation rules would not apply, such as the use of EAC, so these would need to be changed or made conditional.	We will amend the BSCP502 to reflect that during the legal text drafting.
Business Requirements	BR29	How is it envisaged that the situation where SVAA receives no data from the HHDC at the next Volume Allocation Run be handled?	We will align the P375 solution with P344 arrangements. That means SVAA will either use past data to estimate or use NULL values (See Scenario 4 response overleaf)

P375 BR responses collated

BR document comments

Section	Para	Comment	ELEXON Response
Scenarios	Scenario 4	Scenario 4, submitting zero or an estimate, I don't see this requirement mentioned in BSCP601, please can you clarify?	Well spotted. BSCP601 doesn't have that provision, neither does BSCP602. However, TERRE requirement states "(...) then the SVAA will, where possible, derive data from the previous Settlement Run for that Settlement Day. If no previous Settlement Run exists then no data is entered into that Settlement Run". We should mirror TERRE provisions.
BSC Change Summary	2.1	I believe this and the P376 solution should also apply to assets registered behind a Supplier's Additional BMU – as all of this still applies to them. I've not made this comment below on the other VLP references and have interpreted these to mean VLKP and Additional BMUs.	P375 solution applies to any assets behind the boundary Point, regardless to whom the Boundary Point is registered (and to what BM Unit it belongs). HHDA will be obliged to submit data for BP MSID Pair (including Primary BM Unit being affected by AMSID).
BSC Change Summary	2.1	Aggregation through a Supplier was already possible	Correct. We do not believe that we need to change 'aggregators' to 'VLPs'. Aggregators do not have a BSC connotation and could mean either VLPs or Suppliers.

BR document comments

Section	Para	Comment	ELEXON Response
BSC Change Scope	2.3	Just to highlight that the scope should also include Supplier Additional BMUs	<p>It will not. AMSID will not be a part of any other BM Unit than the Secondary BM Unit. Whoever wants to use them, will have to become VLPs for the purpose of P375. BP MSID Pair affected by an AMSID can belong to any Primary BM Unit.</p> <p>However, P379 WG is considering how AMSIDs can be used for their solution.</p>

[P375 BR responses collated](#)



P375
Asset Metering
Code of Practice 11

Workgroup review

P375 Asset Metering COP11 Review Comments

- [Review folder](#)



P375 Workgroup Terms of Reference



P375
Consultation Questions

P375 Draft Consultation Questions

- The Workgroup proposes to use MOA Alternative (non-BSC MOA). Do you believe that BSCCo should maintain a new register of MOA alternatives or does BSCCo need to only know that the VLP is using an MOA alternative?
 - Follow up question on the proposed COP3 threshold below which VLP can use MOA Alternate / should the boundary be <1MW or <100kW
- For P375 the Workgroup proposes a set of information (data attributes) to be collected from the VLPs. Do you believe that the proposed list is appropriate given that less information is required from VLPs who register MSID Pairs?
- Given that P375 process will require Metered data to be in place in time for II run, how often should HHDC submit Metered Volume data to SVAA? If the proposed +3WD appropriate?
- ELEXON believes that SVAA should (as a part of its assurance activities) instruct HHDC to provide Metered Data (just like HHDA does for BP MSIDs). Do you agree?

P375 Updated Timetable

Event	Date
Finalise P375 solution by Workgroup 5 Business requirements and COP11 page turn, define consultation questions	<i>20 August 2019</i>
Impact Assessments and Legal Text Review, agree Consultation questions by Workgroup 6	<i>W/C 21 October 2019</i>
Assessment consultation	<i>28 October – 15 November 2019</i>
Consultation responses consideration by Workgroup 7	<i>W/C 25 November 2019</i>
Assessment Report presented to Panel	<i>9 January 2020</i>
Report Phase Consultation	<i>15 January 2020 – 4 February 2020</i>
Draft Modification Report presented to Panel	<i>13 February 2020</i>
Final Modification Report submitted to Authority	<i>20 February 2020</i>



AOB

P375 workgroup Terms of Reference (1 of 2)

P375 Terms of Reference	How it has been met
<p>1.1.5 The Workgroup will consider the following areas and include these in its Assessment Report:</p>	
<p>a) What standard of metering will be required? Note any differences between the standards of metering used for other Balancing Services such as STOR (the use of Secondary BM Unit’s may be extended further than the use of Replacement Reserve under TERRE).</p>	<p>Produced a new Asset Metering Code of Practice 11</p>
<p>b) Consider appropriate ways to demonstrate independence of the asset if required? How can we appropriately provide assurance of the impacts of the balancing service on the Total System?</p>	<p>Agreement in Workgroup 4, VLP risk register sent to WG</p>
<p>c) How will pseudo MPANs be registered and linked to the asset and how will these MPANs be subsequently be linked to the Settlement Meter?</p>	<p>New registration process detailed in Business Requirements</p>
<p>d) Is the solution, or can it be future proofed against potential future Industry developments, for example domestic assets providing Balancing Services or operating in the Balancing Mechanism.</p>	<p>Consultation with four suppliers of equipment, leaders in their field. Meeting outputs incorporated into COP11.</p>
<p>e) What changes are needed to BSC documents, systems and processes to support P375 and what are the related costs and lead times?</p>	<p>VLP AMSID Registration, MOP and DC Appointment, Settlement, Assurance are detailed in the Business Requirements, legal text redlining will begin once BRs agreed and signed off</p>

P375 workgroup Terms of Reference (2 of 2)

P375 Terms of Reference	How it has been met
<p>1.1.5 The Workgroup will consider the following areas and include these in its Assessment Report:</p>	
<p>f) Are there any interactions (complements and conflicts) between P375 and P376?</p>	<p>Combining P375 and P376 Workgroups, Baselineing can be used as an alternative to P375 Metering. P379 is waiting final draft of COP11 to take the solution forward</p>
<p>g) Will any new data flows or amendments to data flows be required?</p>	<p>Identified in the Business Requirements, there will be new manual flows for registration, DTN can work for AMSID data however change request needed for MRA for DC D36 needs to go also to SVAA. VLP sends new flow for delivered volumes to SVAA</p>
<p>h) Are there any Alternative Modifications?</p>	<p>The original is solution is still the solution, with future proofing in the design</p>
<p>i) Should P375 be progressed as a Self-Governance Modification?</p>	<p>Agreement that it affects competition, as Asset Metering opens the possibility of balancing service revenue without system benefit, although PAF should prevent this.</p>
<p>j) Does P375 better facilitate the Applicable BSC Objectives than the current baseline?</p>	<p>To be voted on WG6</p>