

CP1495 'Introduction of a rejection response dataflow for a D0170 'Request for Meter System Related Details' request from the Meter Operator Agent to the Licenced Distribution System Operator where a D0215 'Provision of Site Technical Details' response is required"

ELEXON



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About This Document

The purpose of this CP1495 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1495. The Supplier volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1495.

There are six parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes.
- Attachments A-D contain the proposed redlined changes to deliver the CP1495 solution.
- Attachment E contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.

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1 Why Change?

Background

The processes for the registration, installation and Commissioning of Metering Systems are contained within Balancing and Settlement Code (BSC) Procedure [\(BSCP\) 514 'SVA Meter Operations For Metering Systems Registered in SMRS'](#) and [BSCP 515 'Licensed Distribution'](#).

As part of the 'New Connections'¹ and 'Change of Measurement Class'² (CoMC) processes, the Meter Operator Agent (MOA) will request Site Technical Details from the relevant Licensed Distribution System Operator (LDSO). This is done by sending a D0170 'Request for Metering System Related Details' dataflow from the MOA to the LDSO. Within five Working Days (WDs) of receiving a D0170 dataflow from an MOA, the LDSO is required to respond by sending a D0215³ 'Provision of Site Technical Details' dataflow. The D0215 dataflow includes information such as measurement transformer⁴ ratios (where applicable) which is essential to the MOA. The information provided on the D0215 enables the MOA to understand the requirements of the site and therefore install metering that correctly and accurately measures flows of electricity to and from the site.

An MOA may send a D0170 dataflow to an LDSO at any point during their appointment, as required for example (and most commonly) as part of the Change of Agent (COA) process. The LDSO shall respond within 5 WDs in all cases by sending a D0215 dataflow.

What is the issue?

Functionality does not exist within the D0215 dataflow for LDSOs to inform the MOA where the requested information cannot be provided. There is therefore no formal means for an LDSO to reject a D0170 dataflow when they are not in a position to provide the requested data. This can be communicated back to the MOA informally (e.g. via email), but such notifications and the reasons for rejection are difficult to provide evidence for when audited.

In March 2016 the BSC Auditor raised [issue 5177](#) (Use and Accuracy of Information within the D0215 dataflow). The Auditor highlighted that, due to MOAs' concerns over the data provided in the D0215 dataflow, some MOAs were non-compliant for not sending D0170 dataflows. Instead, MOAs chose to rely on information from alternative sources. An example of such an alternative source is the 'additional comments' field in the D0142 'Request for Installation or Change to a Metering System Functionality or the Removal of All Meters' dataflow. The Auditor also reported that LDSOs did not always reply to D0170 dataflows and, in some cases, where a D0215 dataflow had been sent, the quality of the data within it had been found not to be reliable.

Where measurement transformer equipment is owned by anyone other than the LDSO, the LDSO is unable to formally respond to a D0170 dataflow to indicate to the MOA that they do not own the equipment. Other valid reasons for an LDSO not to be able to provide a D0215 to the requesting MOA are:



What is a dataflow?

A dataflow is a structured message sent over the Data Transfer Network (DTN) (used by industry participants to share data). Each dataflow has a set structure and can be used to transfer specific pieces of information. Within each dataflow there will be a list of data that can be included and how it should be represented.

[For more information, see the Data Transfer Catalogue website.](#)

¹ When a metering system is connected to the Distribution system for the first time

² Process used in SVA to change the measurement class of a metering point

³ The D0170 must include 'Action Code 21' to prompt the LDSO to respond with a D0215

⁴ Measurement transformers can be either current transformers or voltage transformers and are used to measure current or voltage respectively. Collectively they are referred to as measurement transformers.

- The Metering System was first registered prior to 6 November 2008⁵, for which LDSOs are not obliged to respond to a request for Site Technical Details;
- The D0170 dataflow was incorrectly sent to an LDSO who is not the LDSO for that Metering System; and
- The LDSO may not hold a record of measurement transformer ratios for Metering Systems first registered after 6 November 2008 but before 6 November 2014⁶.

In the absence of a response (and no formal rejection mechanism), in many cases the D0170 request will be sent again by the MOA in an attempt to obtain a complete D0215 dataflow in response. This can soon result in multiple D0170 dataflows being sent for a single Metering System which can become resource intensive and place a strain on the processing capability of the recipient's systems. Because the MOA is unaware of the reason why the LDSO has not responded, they are unable to gain sufficient assurance of the accuracy of the Metering System. This uncertainty poses a risk to Settlement as it may result in inaccurate data being entered into Settlement, thus increasing the potential for Trading Disputes⁷.

There may also be situations where, for whatever reason, the LDSO holds the information requested by the MOA for Metering Systems where it is not obliged to provide it. However, there is equally nothing within the BSC that prevents them from sharing that information with the MOA, and so it is encouraged that, where an LDSO has valuable information to send on the D0215 dataflow, then it shall do so.

⁵ As described in BSCP 514 footnote 12.

⁶ Implementation date of BSC [Modification P283](#) which placed new obligations on the LDSO and Transmission Company

⁷ See [BSC Section W 'Trading Disputes'](#)

Proposed solution

[CP1495](#) was raised by ELEXON on 2 October 2017.

This CP proposes to introduce a new dataflow DXXXX 'D0170 Rejection Response' to the Data Transfer Catalogue (DTC). The DXXXX dataflow will serve as a rejection from the LDSO in the cases where the LDSO cannot provide a complete D0215 dataflow for one of the reasons defined within the valid set of the 'rejection reason' data item (as described below). [DTC CP3523](#) has been raised to create this new flow within the DTC and CP1495 will reflect the DTC changes and update the associated process steps in the relevant BSCPs and other configurable items. The DXXXX dataflow will contain a new data item 'Rejection Reason'. The valid set (taken from DTC CP3523) is:

- Measurement transformers installed pre-2008;
- Measurement transformers are not owned by the LDSO and are unlikely to ever be adopted into LDSO ownership;
- Measurement transformers are not LDSO owned and are not yet adopted into LDSO ownership;
- LDSO is not the relevant System Operator (SO) for the Metering Point; and
- Measurement transformer ratio(s) are unknown.

Please note: The actual numbering of the dataflow will be assigned by the Master Registration Agreement Service Company (MRASCo) approximately two months before the CP1495 Implementation Date and will follow the standard 'DXXXX' format (e.g. D0170 or D0215). DXXXX is being used as a placeholder in the BSC Configurable Items amended for CP1495 to allow the SVG to approve CP1495 before the actual flow number is available. The version of these BSC Configurable Items that become effective on the CP1495 Implementation Date will contain the actual flow numbers.

Proposer's rationale

The expedient flow of accurate and reliable information between MOAs, Registrants and LDSOs will reduce delays in Commissioning. This CP will reduce the risk of inaccurate metering data being used in Settlement and, as a result, reduce the number of potential Trading Disputes. The rejection reasons proposed as part of DTC CP3523 will give MOAs enough information to make an informed decision on the next action required and to report this effectively to the Registrant, where necessary.

CP1495 will allow LDSOs to respond to a D0170 dataflow where they are unable to provide the required information while giving a valid reason for why this is the case. It will be much more informative than the current approach of not responding, or responding with invalid or erroneous data, and will provide an auditable positive confirmation of an unknown in response to a D0170 dataflow. This change will therefore also reduce the number of repeated D0170 dataflows being sent, thus reducing MOA and LDSO resource requirements and system pressures. Finally, it will bring the passing of information by dataflow into line with other industry practices by using the Data Transfer Network to pass Meter related information.

ELEXON hosted a Workgroup on 25 June 2017 to discuss the creation of dataflows to improve communications within the Commissioning process. The quality of D0215 dataflows was raised by the LDSOs and MOAs in attendance. The Workgroup recommended raising a change (to the DTC and the BSC) to introduce a new formal rejection to a D0170 dataflow.

CP Consultation Question

Do you agree with the CP1495 proposed solution?

Please provide your rationale.

We invite you to give your views using the response form in Attachment E

Proposed redlining

Attachments A-D set out the proposed draft changes to the BSC Configurable Items required to implement the proposed solution.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1495 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment E

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1495 will require changes to four Code Subsidiary Documents (CSDs):

- Changes to BSCP514 and BSCP515 will reflect the introduction of DXXXX; and
- Changes to the SVA Data Catalogue Volumes One and Two will reflect the introduction of DXXXX into the DTC.

CP1495 has no impact on BSC systems.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP514• BSCP515• SVA Data Catalogue Volume 1: Data Flows• SVA Data Catalogue Volume 2: Data Items	<ul style="list-style-type: none">• <i>None</i>

Central costs

The central implementation costs for CP1495 will be approximately £240 (one ELEXON WD) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

CP1495 will require MOAs and LDSOs to implement system changes to receive and send the DXXXX respectively. They will also need to amend their Commissioning processes, however we seek confirmation of this in the CP Consultation.

DTC CP3523 will be presented to the MRASCO Development Board for approval in December 2017. If approved, this would give Parties six months to make the necessary changes to their systems for implementation in June 2018.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
LDSOs and Embedded LDSOs	Amend systems to create new dataflows. Implement changes to Commissioning process to comply with CSD changes.
Half Hourly MOAs	Amend systems to receive new dataflows. Implement changes to Commissioning process to comply with CSD changes.
Non Half Hourly MOAs	Amend systems to receive new dataflows. Implement changes to Commissioning process to comply with CSD changes.

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No other BSC Parties or Party Agents are expected to be impacted, however we will confirm this through the CP Consultation.

CP Consultation Questions

Will CP1495 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1495 and the CP1495 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1495?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment E

4 Implementation Approach

Recommended Implementation Date

CP1495 is proposed for implementation on **28 June 2018** as part of the June 2018 BSC Systems Release.

CP1495 is being progressed alongside MRASCo's DTC CP3523. A decision on whether or not to implement DTC CP3523 is expected in December 2017. MRASCo's Implementation Date for this is expected to be 28 June 2018.

To coincide with this, so that the BSC and DTC changes are introduced at the same time, we therefore believe it is pragmatic for CP1495 to also be implemented on 28 June 2018.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1495?

Please provide your rationale.

We invite you to give your views using the response form in Attachment E

SVG's initial views

Concern was expressed over whether or not the proposed solution will deal with MOAs not having the required data even if the LDSO responds with a DXXXX dataflow. Whilst this may be a concern, the reason for not providing the data should then drive the MOA to seek alternative means of sourcing the data. This could be as simple as contacting another LDSO with a D0170. Alternately, it may require a site visit to ascertain measurement transformer ratios if they cannot be devised via any other means. Whatever the route the MOA will be required to take, the content of the DXXXX dataflow will direct their action as opposed to the current situation whereby a lack of erroneous response does not change anything and still leaves the MOA with no next step to take.

6 Appendix 1: Glossary & References Acronyms

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	BSC Procedure
CMRS	Central Meter Registration Service
CoA	Change of Agent
CoMC	Change of Measurement Class
CoP	Code of Practice
CP	Change Proposal
CPC	Change Proposal Circular
CSD	Code Subsidiary Document
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
LDSO	Licensed Distribution System Operator
MOA	Meter Operator Agent
MRASCo	Mater Registration Agreement Service Company
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
WD	Working Day

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0142	Request for Installation or Change to a Metering System Functionality or the Removal of All Meters
D0170	Request for Metering System Related Details
D0215	Provision of Site Technical Details

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External links

A summary of all hyperlinks used in this document are listed in the table below. All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	CoP4 page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/codes-of-practice/
2	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all
2	BSC Audit findings page on the ELEXON website	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-techniques/audits/bsc-audit/
2	CoP4 guidance page on the ELEXON website	https://www.elexon.co.uk/bsc-and-codes/bsc-guidance-notes/
2	DTC page on the MRASCo website	https://dtc.mrasco.com/default.aspx
3	Modification P283 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p283/
3	BSC Section W 'Trading Disputes'	https://www.elexon.co.uk/bsc-and-codes/balancing-settlement-code/bsc-sections/
4	CP1495 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1495/
4	MRASCO Change webpage	https://mra.mrasco.com/change/creation-of-rejection-flow-response-for-d0215-request/