

4.7 Issue Form

Issue Form - BSCP40/04	Issue Number 112 (mandatory by BSCCo)
<p>Issue Title <i>(Mandatory by originator)</i></p> <p>Clarifying Half Hourly Data Collector (HHDC) obligations within BSCP502 (Half Hourly Data Collection for Supplier Volume Allocation (SVA) Metering Systems Registered in Supplier Meter Registration Service (SMRS)) regarding the fault investigation process.</p>	
<p>Issue Description <i>(Mandatory by originator)</i></p> <p>At the May 2023 Performance Assurance Board (PAB) meeting, Exelon presented the findings report for an Assurance Information Request (AIR) on SVA Risk 005 (Fault Resolution). The PAB responded with questions around some of these findings, specifically around:</p> <ul style="list-style-type: none"> • The reporting of alarm flags through Hand Held Reads (HHR); • Differing approaches to dealing with several types of alarm flags and which alarm flags the Half-Hourly Data Collectors (HHDCs) choose to report on; and • General concerns around HHDC non-compliance with the BSC. <p>Exelon took an action to further review Party responses, along with the findings report, and update the PAB if a change was required to the report, its recommendations, or if any material concerns, or non-compliances with the respective BSC Procedure (BSCP) obligations, were identified. Exelon has concluded that:</p> <ol style="list-style-type: none"> 1. Alarm flags are not always investigated by the Supplier and HHDC on the first discovery, and instead, in some cases, the HHDC waits for the second flag to appear before investigating. The HHDC should be acting on all Meter alarms and reporting them to the Meter Operating Agent (MOA) and Supplier. The obligation on the HHDC is to raise a fault flag to the MOA as appropriate. In the absence of further information to establish the appropriateness of the timeline in each case, Exelon considers this compliant with BSCP502, section 3.4.3. 2. Alarm flags are reported on either a daily, weekly, or monthly basis, which is not consistent between each Party, but all alarm flags are reported. Delaying the report of the alarm flag to the relevant MOA or Supplier could mean that a Settlement Error could occur, which is not dealt with in a timely manner. The obligation on the HHDC is to report inconsistencies at any time. In the absence of further information to establish the appropriateness of the timeline in each case, Exelon considers this compliant with BSCP502, section 3.4.2. 3. Alarm flags are reported to both the MOA and Supplier but not necessarily at the same time. This is compliant with BSCP502 as it does not state that the report needs to be done concurrently, just that it is done. 4. Anecdotal information was provided within the AIR from one of the six HHDCs, that MOAs advise the HHDC that they should not report on specific faults flags, and that the MOA will ignore specific flags if they are reported. Not reporting specific fault flags could result in a Settlement Error. This is non-compliant with BSCP502. 5. One HHDC reported its processes for alarms that are detected on-site using HHR downloads. The process around HHRs was not within scope of this AIR as this relates to Risk 007 (Data Collection), not Risk 005 (Fault Resolution). Further assurance in this area will be considered against Risk 007 in line with the Risk Operating Plan (ROP). <p>From the additional findings listed above, Exelon has concluded that further assurance activities are required with regards to Risk 005. However, with the absence of timescales this leaves compliance in some areas to interpretation.</p>	

Justification for Examining Issue *(Mandatory by originator)*

Regarding the additional concluded findings, Elexon found that points 1, 2 and 3 above were compliant with BSCP502. However, Elexon has considered that the obligations for the first and second points are not adequate for purpose and require an additional review.

The fourth concluded point was non-compliant regarding MOAs advising HHDCs to not report on specific fault flags which could result in a Settlement error. Therefore, Elexon will be engaging with the Retail Energy Code (REC) to provide feedback on the findings of this AIR in respect of the MOAs advising HHDCs to not report on specific fault flags. However, there has been no confirmation as to when the REC can commit to these duties yet.

Elexon has agreed on some follow up actions, which includes creating this Issue Group to discuss and create timescales for the fault investigation process. The justification for these is as followed:

1. The first concluded finding has no timescales for this action in BSCP502. Only “As appropriate” which does not state when it is done, only that it should be done. Timescales should be implemented to make sure that all fault flags are being reported in a timely manner.
2. For the second point, there are no timescales for this action in BSCP502. Only “at any time”, which could mean delays in HHDCs investigating and reporting active faults. Adding timescales should improve the efficiency of the fault investigation and resolution process.
3. The fourth point is non-compliant with BSCP502 and there is no mention in the BSCP that states a MOA can inform a HHDC to not report fault flags or make allowance to ignore a fault flag. HHDC’s followed the MOA’s request in not reporting specific flags to them when all the flags should be reported. This signifies non-compliances from both sides. The Issue Group will allow relevant attendees and parties to be aware of the MOA’s obligation which is contributing to the increase in unresolved fault flags. The Issue Group will also discuss the relevance of all fault flags and will consider whether all fault flags do need to be reported.

The new Risk Operation Plan (ROP) for [2024/25](#) will prioritise Risk 005 and the risk that unresolved faults pose to the accuracy of Settlement data. As well as running this Issue Group and progressing any recommended changes to BSC documents, Elexon will continue cross-code engagement with the Retail Energy Code to ensure that MOAs are acting on all fault flags reported by HHDCs and Suppliers, and that MOAs are not directing HHDCs to not report fault flags, which is non-compliant with the BSC

Elexon considers that leaving this issue unresolved could lead to impacts on Settlement. Should Meter faults not be investigated and corrected due to failure in raising fault flags correctly, this will lead to inaccurate or estimated data in Settlement

Potential Solution(s) *(Optional by originator)***Proposer’s Details****Name**

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4.8. Issue Form Guidelines

These guidelines are to be used to assist in the completion of the Issue Form, contained in Appendix 4.7. The guidelines state who should complete each item on the form and whether it is mandatory or optional. They also give a brief description of the information that should be given for each item. For further support on completing this Issue Form, please contact BSCCo. Once completed this form should be submitted to BSCCo.

- **Issue Number** –mandatory to be completed by BSCCo once the proposed issue has been received. This is a unique number.
- **Issue Title** – mandatory and is completed by the proposer of the Issue at the time the issue is raised. This should be unique where possible.
- **Issue Description** – mandatory and is completed by the proposer of the Issue. The description should include as much detail as possible of the issue being encountered.
- **Potential Solution(s) - optional** by originator – This is to be completed where the proposer of the Issue has potential solutions that they want to be discussed as part of a potential solution to the issue.
- **Justification for Examining Issue** – mandatory by proposer of the Issue – details of the business case for examining the issue. This section should also include a brief assessment of the risk associated with leaving the problem/issue unresolved, in terms of materiality and probability of occurrence.
- **Proposer's Details** – mandatory completion by proposer of the Issue – the name, organisation, email address and telephone number of the proposer. This should include details of any originators of the Issue, for example if BSCCo is raising an Issue on behalf of another participant.