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SUMMARY OF DISCUSSIONS

The Workgroup considered whether it would be appropriate to extend the D0135 'Asset Condition Report' process to Licensed Distribution System Operators (LDSOs) to assist in resolving faults on LDSO owned Metering Equipment or whether a specific BSC process would be needed. The Workgroup noted that the process would sit outside of the BSC, but supporting processes would be included in the Balancing and Settlement Code Procedures (BSCPs), and so data quality could be ensured through the BSC Audit.

The Workgroup considered when the D0002 'Fault Resolution Report or Request for Decision on Further Action' should be sent to close. It decided that this should be when the MOA can take no further action, either because the fault is fixed or the issue is outside the control of the Meter Operator Agent (MOA). The proposed new 'updates flow' contained a request to close, the workgroup questioned whether this was a prerequisite to sending the D0002 to close the fault.

ELEXON asked the Workgroup whether it wanted to develop a process bespoke to the Half Hourly (HH) market, as the Fault Investigation Review Group (FIRG) recommendations intended, or a more generic process that could be used for both HH and Non Half Hourly (NHH). The Workgroup noted the smart Meter programme that would reduce the size of the NHH market. Similar discussions had been had under P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'. As such it decided that initially a HH process should be developed, which could be extended to the NHH market at a later date if desired.

ELEXON asked the Workgroup what had changed since the FIRG recommendations in 2015. One member noted that their handling of adopted sites has changed due to interoperability issues particularly with Measurement Class E and G Meters adopted since the implementation of P272 To ensure that the process of resolving faults is effective, the Workgroup considered that it would be beneficial to understand the root causes of faults and agreed to provide ELEXON with data for some analysis.

The Workgroup noted that the introduction of an 'intended action date' in the new data flow would improve the flexibility of the faults process while maintaining accountability. It noted that there should still be SLAs to prevent this date being years in the future and that this could be based on the categorisation of the site. The Workgroup noted that including the Supplier in the recipients would increase transparency and help the Supplier manage its agents. The Workgroup noted that the allowable values for the 'intended action date' should depend upon what equipment needed to be fixed. ELEXON thought the initial update after 5WD should be maintained as the MOA should have an idea of either what the issue is or when it would be able to visit the suite within this time. The Workgroup commented that the process should also prevent a cyclical process of extensions being used to avoid resolving the fault. A member suggested that the fault categorisations should therefore have a 'drop dead' time at which the fault should be resolved after it is raised.

The Workgroup noted that categorising faults would allow different fault rectification Service Level Agreements (SLAs) to be implemented for Metering Equipment registered against different Codes of Practice (CoPs). The Workgroup commented that it may be beneficial to also categorise SLAs by type of site. ELEXON commented that categorising faults by type of site (particularly geographically) may lead to ambiguity if it is not clearly defined and expressed a preference for Measurement Class (MC) as the divider. ELEXON noted that the Supplier could use its discretion as to whether certain sites should be treated differently and deal with this commercially.

One member commented that a MOA will rarely be able to resolve 100% of faults, making it hard to be fully complaint with the current process. The member questioned whether a new status of 'suspended' would enable these sites be handled differently. ELEXON thought that even if this was the case, such faults shouldn't be excluded from the audit scope. The Workgroup considered whether it was right for the non-compliance to remain with the MOA if the action was beyond its control, or whether the non-compliance could be on the Supplier. The Workgroup noted the need to consider real world situations rather than a total compliance based approach. ELEXON agreed to investigate whether the audit scope could be amended to make the handling of faults more efficient.

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The Workgroup commented that ELEXON would need to be clear in how the faults would be categorised. It also noted that the DC would only have an indication of the fault type and so the timescale for resolving shouldn't start until the MOA had confirmed what the fault was. The Workgroup felt that some of the categories were not specific enough and that 'other' and 'Faulty Meter' could be too generic. It commented that if these were chosen a free text field should be mandated to provide more information. The Workgroup also commented that there should be a separation between the indicative DC fault category in the D0001 and the confirmed MOA category in the new flow.

The Workgroup commented on the performance reporting timescales and considered that these should begin when the MOA is notified of the fault rather than the fault being identified by the Data Collector (DC), to reduce external factors affecting the MOAs performance. ELEXON agreed to consider whether this could be included into the Performance Assurance and Reporting Monitoring System (PARMS) review.

The Workgroup questioned how the faults process would work on a Change of Agent (CoA) or Change of Supplier (CoS). It was suggested that a similar process to the one could by Commissioning could be adopted, requiring the old MOA to send records to the new MOA and from old Supplier to new Supplier. The Workgroup thought that careful consideration would need to be given to how this would work in practice.

The Workgroup discussed who responsibility for closing faults should lie with. It noted that is this was the Supplier, there could be a risk that a Supplier forces faults to be left open which the MOA has no ability to fix, such as where the fault is with the DC systems. The Workgroup considered whether different faults should have different people to close them or whether 'DC faults' should be introduced into the process. A Workgroup member believed that rather than introducing DC faults with a set of D flows, it would be more productive for parties to talk to each other and suggested creating a 'suspected DC Issue' in the D0002 flow. If ELEXON were to consider introducing 'DC faults' to the process, then it would need to assess the size of the problem to ensure that action is proportional, though the Workgroup noted that ELEXON has most influence over Suppliers and that under the Supplier Hub Principle the Supplier should be managing its agents to ensure faults are efficiently resolved.

The Workgroup noted that some DC systems automatically generate D0001 flows and this can result in the same fault being repeatedly raised. The Workgroup considered that where the Moa can evidence that the fault lies outside of its control, it should be able to request that the Supplier liaises with the DC to investigate before the fault is raised again. The Workgroup thought that such evidence would be at the Supplier's discretion, but considered that two consecutive days meter readings seemed appropriate.

The workgroup considered that the proposed 'unique fault reference' needed to include more characters to ensure it is unique. It suggested including the MPAN core, as well as the originating MPID and a reference number.

ACTIONS

No	Action	Action Owner
1.	Provide ELEXON with data on fault causes for analysis	All
2.	ELEXON will take on board the Workgroup comments on the FIRG recommendations to redraft the faults process.	ELEXON
3.	Consider whether amended timescales for MOA fault resolutions can be included in the PARMS review.	ELEXON
4.	Consider whether the audit scope could be amended to make the handling of faults more efficient.	ELEXON