

4.7 Issue Form

Issue Form - BSCP40/04	Issue Number 73 <i>(mandatory by BSCCo)</i>
Issue Title <i>(Mandatory by originator)</i> Review of fault management and resolution timescales	
Issue Description <i>(Mandatory by originator)</i> <p>Following a Technical Assurance of Performance Assurance Parties (TAPAP) audit conducted by ELEXON in 2013, it was found that the fault investigation process described in the Balancing and Settlement Code (BSC) documentation was not enabling the effective resolution of identified faults and could be improved to be more efficient. The report found that the timescales for fixing faults were unclear; and insufficient guidance was provided on which party involved in the faults process was responsible for each step.</p> <p>A group of industry experts came together as the Fault Investigation Review Group (FIRG) to review the faults process and propose changes. The FIRG met throughout 2015 and produced a list of recommendations for improvements to the faults process. However, at the time, due to the amount of ongoing change (particularly the large scale Commissioning changes that used much of the same resource) these recommendations were not immediately progressed.</p> <p>The BSC Audit report for the audit year 2016/17 identified unresolved Metering System faults as a significant issue. The BSC Auditor continued to highlight Metering System faults not being resolved as a key issue in the 2017/18 audit report. As a result, this Issue will review the recommendations of the FIRG and, progress those which are still appropriate. This BSC Issue is also intended to investigate issues that have been raised to ELEXON around the faults process since the work undertaken by the FIRG.</p> <p>The FIRG identified the following issues with the current faults processes:</p> <ul style="list-style-type: none"> • The use of the D0005 'Instruction on Action' Data Flow in the faults process is confusing and not adequately defined. BSCP 514 prescribes an initial D0005 being sent by the Meter Operator Agent (MOA) to the Half Hourly Data Collector (HHDC) or Supplier (depending on who raised the fault) five Working Days (WD) after the fault was raised to provide an update on the resolution of the fault. If the fault remains unresolved, a second D0005 is sent 10WD later to provide a further update. Following this, the MOA is required to update the HHDC (or Supplier) of the status of the fault 'as appropriate' and on a 'regular basis'. These timescales are not defined and so it is unclear how often an update should be given after the initial 15WD. • The D0005 is used in different processes and so there is not a specific data flow for updating on faults. The flow is sometimes used by Suppliers, to request a site investigation by an MOA. While this is not incorrect process, it can be confusing to have one flow with multiple purposes. • Where multiple faults are identified and multiple D0001 'Request Metering System Investigation's raised on a single Metering System Identifier (MSID), the sending of a D0002 'Fault Resolution Report or Request for Decision on Further Action' to close a fault can be confusing as to which fault has been rectified. Many MOAs have 	

informed ELEXON that some systems will close the oldest open fault on an MPAN and some will close the latest. This requires some manual intervention to correct where wrong. It can also lead to new D0001s requiring to be raised, which starts the defined timescales again.

- Data Item [J0024 'Site Visit Check Code'](#) is included in both of the D0001 and D0002 Data Flows and can be used to provide a description of the fault. However as this Data Item is used in multiple flows there are 89 different codes, of which not all apply to faults. This makes it difficult to categorise faults, which can lead to a delay in processing and rectifying them.
- It has been reported that some MOAs incorrectly send a D0002 where more information is required (for example site access information). This will close the fault even though it has not been rectified, so it will need to be reopened. [BSCP502](#) clearly states that a D0002 is to resolve a fault.
- Some faults cannot be rectified through the faults process and may be required to undergo a change of communication type which can be time consuming (Permanent handheld reads/BT Lines for instance). The FIRG argued that in these cases the faults should be closed as there is no more action the MOA can take.
- The FIRG argued that Service Line Agreements (SLAs) for fault rectification should be based on the type of fault. For instance, it takes much longer to rectify a technical issue with measurement transformers than it would to rectify a standard communication fault. The difficulty in categorising faults would make this difficult to achieve.
- BSCP514 states that the HHDC or Supplier must respond to a D0005 notification with another D0005. In practice, this does not happen and is confusing the process, particularly for new entrants.
- BSCP514 does not differentiate timescales for fixing faults by Measurement Class. The performance standard for Measurement Class C is to Settle 99% of energy on actual reads by the Initial Settlement Run (SF) (16WD). For Measurement Class E the standard is 99% actual data at Reconciliation Run 1 (R1) (39 WD) for Measurement Classes F and G, the standard is 90% at R1. The Issue will consider the prioritisation of Metering System faults affecting Measurement Class C to best protect Settlement?

A BSC Party has informed ELEXON that it believes there are similar problems with Licensed Distribution System Operator (LDSO) fault management. The Party specifically highlighted the ambiguity around timescales, which was also noted by the FIRG. BSCP514 does not specify which parties are responsible for resolving faults. This can be problematic when the party attempting to resolve the fault is not the equipment owner. The implementation of [P283 'Reinforcing the Commissioning of Metering Equipment Processes'](#), clearly defined the responsibilities of Commissioning of certain Metering Equipment, placing the obligation on the equipment owner. This principle could be extended to the rectification of faults. BSCP514 currently places all obligations around fault rectification on the MOA but where the fault is with equipment owned by the LDSO then the MOA is rarely able to take rectification actions.

Justification for Examining Issue *(Mandatory by originator)*

The BSC Auditor highlighted that faults are not rectified in a timely and efficient manner.

Faults that remain unresolved can potentially lead to an increased level of estimated and potentially inaccurate data entering Settlement.

This issue will review the processes around fault resolution for MOAs Suppliers and LDSOs to ensure that the BSC is enabling efficient rectification.

Potential Solution(s) (*Optional by originator*)

The FIRG's main recommendation is the introduction of a new Data Flow that would be specially for providing updates relating to the fault resolution process.

A new Data Flow may include the following:

- A unique fault reference. This would ensure that the correct fault is closed when multiple D0001s are raised against an MSID.
- Fault Category Code. This would ensure that MOAs could efficiently categorise faults that they receive based on type.
- Expected Fault Resolution Date. This would give a means to commit an MOA to an expected date that they will resolve the fault when providing an update.
- Reason for Fault Communication. This would allow the fault communication to be sent for different reasons. It may be that an MOA wants to request to close a fault where no further action is required, or for an MOA to request assistance from either the Supplier or HHDC.
- No Access Indicator. This would allow an MOA to communicate to a Supplier/HHDC that they have been unable to gain access to the site and may require assistance in securing access.
- Request Permission to Close Unresolved Fault/Permission to Close Unresolved Fault. These two Data Items would go between an MOA and a Supplier where the MOA feels they can take no more action to resolve the fault. A Supplier could then give them permission to close the fault.

The unique fault reference could also be added to the D0001 and D0002 Data Flows for consistency.

Although any new Data Flows would form part of the Data Transfer Catalogue (DTC), which sits under the [Master Registration Agreement \(MRA\)](#), as it was a FIRG recommendation, ELEXON intends to discuss the recommendation under this Issue; which may then lead to both BSC and DTC Change Proposals (CPs).

Further to the specific recommendation of the FIRG, an overview of the faults process in general with the issue mentioned previously would be beneficial.

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