ELEXON

P441 Workgroup Meeting 6 Summary

Summary

1. Meeting Objectives

The Chair welcomed attendees and presented the meeting objectives:

- Agree the requirements for the P441 redlining
- Determine whether there is an Alternative Modification and solution the Workgroup wishes to progress
- Determine what other Industry Codes are impacted and cross code interactions
- Confirm the Workgroup's initial views against the Applicable BSC Objectives
- Confirm the next steps

2. Workgroup (WG) meeting 5 summary and action updates

2.1 Elexon confirmed the outputs from workgroup 5. A Workgroup member queried whether complex sites would bear network costs and Elexon confirmed they would.

2.2 Overview of the BSC Panel Committees

- 2.2.1 Elexon presented an overview of the committees that sit under the BSC Panel, outlining their processes and responsibilities. Two WG members noted that existing committees are setup to preserve existing processes and not to support innovation or facilitate forward looking change.
- 2.2.2 Elexon confirmed there is a BSC Issue process that enables open forum discussion.
- 2.2.3 Elexon confirmed the Modification process is constrained by the defect raised.

3. Class 6 Complex Sites

- 3.1 Elexon suggested a bespoke technical review group to manage Class 6 sites could be setup similar to the Metering Dispensation Review Group (MDRG) in order to provide recommendations to the relevant committee.. Elexon confirmed this does not require formal meetings and is managed via email as required. The application and approval processes involved would be similar to non-standard Balancing Mechanism Units.
- 3.1.1 The proposer and WG members were in agreement this was a suitable approach.
- 3.2 Elexon confirmed ESO and the relevant LDNO are key stakeholders in the MDRG processes and would be in reviewing Class 6 approvals also.
- 3.3 Ofgem advised the proposed legal text is potentially open to interpretation and should focus on practicality as opposed to potential social, environmental or political impacts. The WG discussed Modifications are already expected to be agreed against similar criteria. Elexon will work with Ofgem to review the wording.
- 3.4 The WG advised the solution should include some de-minimis levels of guidance, one suggestion was Class 6 Complex Sites can only be considered where all relevant Metering Systems are located within the same GSP.
- 3.5 The WG advised the application form should include a section on Networks to include the impacts and benefits.

4. Solution Overview and Redlining Approach

4.1 Elexon presented its approach to redlining and the proposed solution and confirmed guidance notes and worked examples would be included and signposted clearly from BSCP502.

- 4.1.1 Elexon confirmed that the HHDC will submit gross data direct to the LDSO for DUoS purposes (Class 5) as opposed to the HHDA submitting the volumetric data as happens today. The proposed change will enable the HHDC to send aggregated data to the LDSO via a D0036 or D0275.
- 4.1.2 A WG member advised they would approach Elexon to discuss if there is a simpler solution.
- 4.2 Elexon confirmed the redlining would be principle based as opposed to prescribed and will include enough guidance and worked examples to support this approach. The WG were supportive of this approach.
- 4.3 A WG member queried if HHDCs would be required to be qualified to undertake the process. Elexon will confirm with the Assurance team but confirmed this is an optional process and DCs do not have to accept complex site appointments.

5. Other Industry Codes impacted by P441

- 5.1 Elexon confirmed parallel changes will need to be raised in both REC and DCUSA. Ofgem have suggested alignment is required on these changes and timelines lined up accordingly.
- 5.2 Elexon confirmed P441 will require an extension in order to align timelines with REC and DCUSA. The Assessment Procedure consultation will be delayed until all codes are ready to consult.
- 5.3 The proposer advised they are set to sponsor the proposed DCUSA change.

6. Alternative Modifications

- 6.1 Elexon confirmed MHHS should not be included as part of an alternative Modification and any proposal needs to be against the existing baseline.
- 6.2 Elexon confirmed alternatives could be raised post consultation, although this would require an additional consultation period if the WG agrees there is a viable alternative.
- 6.3 No alternatives were raised at this stage.

7. Initial views against the Applicable BSC Objectives

- 7.1 The WG confirmed they were not in a position to vote until they have visibility of the legal text.
- 7.1.1 Elexon confirmed this will be made available prior to the next WG.

8. Recap on Terms of Reference

- 8.1 National Grid advised the wording for Term of Reference (f) was not reflective of previous WGs and needs to be amended. Elexon will work with NG on this prior to the next WG.
- 8.2 The WG requested that the Terms of Reference were tied into worked examples that are being produced.

9. Next steps

- 9.1 Schedule the seventh P441 Workgroup meeting in June or July.
- 9.2 Legal text to be worked up and distributed to members 5WD before the next WG.
- 9.3 Elexon confirmed worked examples will focus on Class 5 as there is already information for Class 1-4.
- 9.4 Elexon to give an indicative view on updated Modification timescales following conversations with REC & DCUSA.

Actions

No.	Action	Owner
1.	Elexon to propose Terms of Reference for new Class 6 Metering Review group.	Elexon

2.	Elexon to update Section K Legal Text based on WG feedback and present to WG members prior to the next WG.	Elexon
3	Elexon to engage with Ofgem to confirm suitable legal text wording for Class 6 sites	Elexon/Ofgem
4	Elexon to provide Class 5 worked examples prior to next WG.	Elexon
5	Elexon to confirm HHDC Qualification requirements	Elexon
6	Elexon to request an extension to P441 from BSC Panel in order to align timelines with DCUSA and REC.	Elexon
7	Elexon to work with REC and DCUSA to align timescales for Modification process	Elexon
8	Elexon to work with National Grid to clarify wording for Term of Reference (f)	Elexon/NGESO
9	Elexon to arrange a follow up WG to review the legal text, update on actions and confirm the Assessment Procedure questions.	Elexon