P441 Digital Meeting Etiquette

- Welcome to the P441 Workgroup meeting 4 – we'll start shortly
- No video please to conserve bandwidth
- Please stay on mute unless you need to talk – use IM if you can't break through
- Talk – pause – talk
- Lots of us are working remotely – be mindful of background noise and connection speeds

P441 ‘Creation of Complex Site Classes’

Meeting 4

21 February 2023

Meeting Agenda

Objectives for this meeting:

- Determine the impacts of P441 on DUoS Charges
- Determine whether a Class 5 Complex Site should be on a “Local” level
- Determine whether the Site arrangements should be forward-looking or retrospective
- Provide an update on the interactions between P441 and the MHHS Programme
- Consider any potential solution(s) which may require further development for discussion at future meetings
- Confirm the next steps

Agenda Item	Lead
1. Welcome and meeting objectives	Keren Kelly (Elexon) – Chair
2. Workgroup meeting 3 summary and conclusions	Stanley Dikeocha (Elexon) – Lead Analyst
3. Impact of Class 5 Complex Site on DUoS Charges?	John Lucas (Elexon) - SME
4. What is defined as “Local”	Christopher Day (Elexon) – Design Authority
5. Will the Site arrangements be forward-looking or retrospective?	Christopher Day
6. What impact will P441 have on the MHHS Programme?	Christopher Day
7. Recap on Terms of Reference	Stanley Dikeocha
8. Next steps	Stanley Dikeocha
9. Meeting close	Keren Kelly

WORKGROUP MEETING 3 SUMMARY

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Workgroup meeting 3 summary

- The third P441 meeting took place on 17 January 2023, where the Workgroup:
  - Continued the discussion on ToR f ‘Impact of Class 5 Complex Site on Network and BSC Charges’;
  - Discussed ToR C ‘What MSIDs need to be registered for each Complex Site Class’;
  - Considered the interactions between P441 and the MHHS Programme; and
  - Noted the progress of the P441 Terms of Reference

- On what MSIDs need to be registered, the WG agreed with Elexon’s suggestion that options 2, 3 and 4 should be progressed. A detailed guidance document would be provided for options 3 and 4, while a simplified guidance document for option 2. Option 1 should be excluded as the WG felt that Customers and generators in Class 5 Complex Site should retain their individual MSIDs

- The WG further considered the impact on BSUoS and TNUoS and the majority concluded that the existing gross import data (at BMU level) will be used for charging purposes on Class 5 Sites

- Elexon highlighted some of the assumptions from the MHHS Programme in relation to P441’s proposal. Essentially, the concerns from the Programme were primarily around how both the Advanced Data Service (ADS) and Smart Data Service (SDS) would operate

NETWORK CHARGING(DUOS) FOR CLASS 5 COMPLEX SITES

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Class 5 impact on DUoS Charges

The proposed approach is that DUoS charges should continue to be calculated from gross consumption data (not the net data entering Settlement)

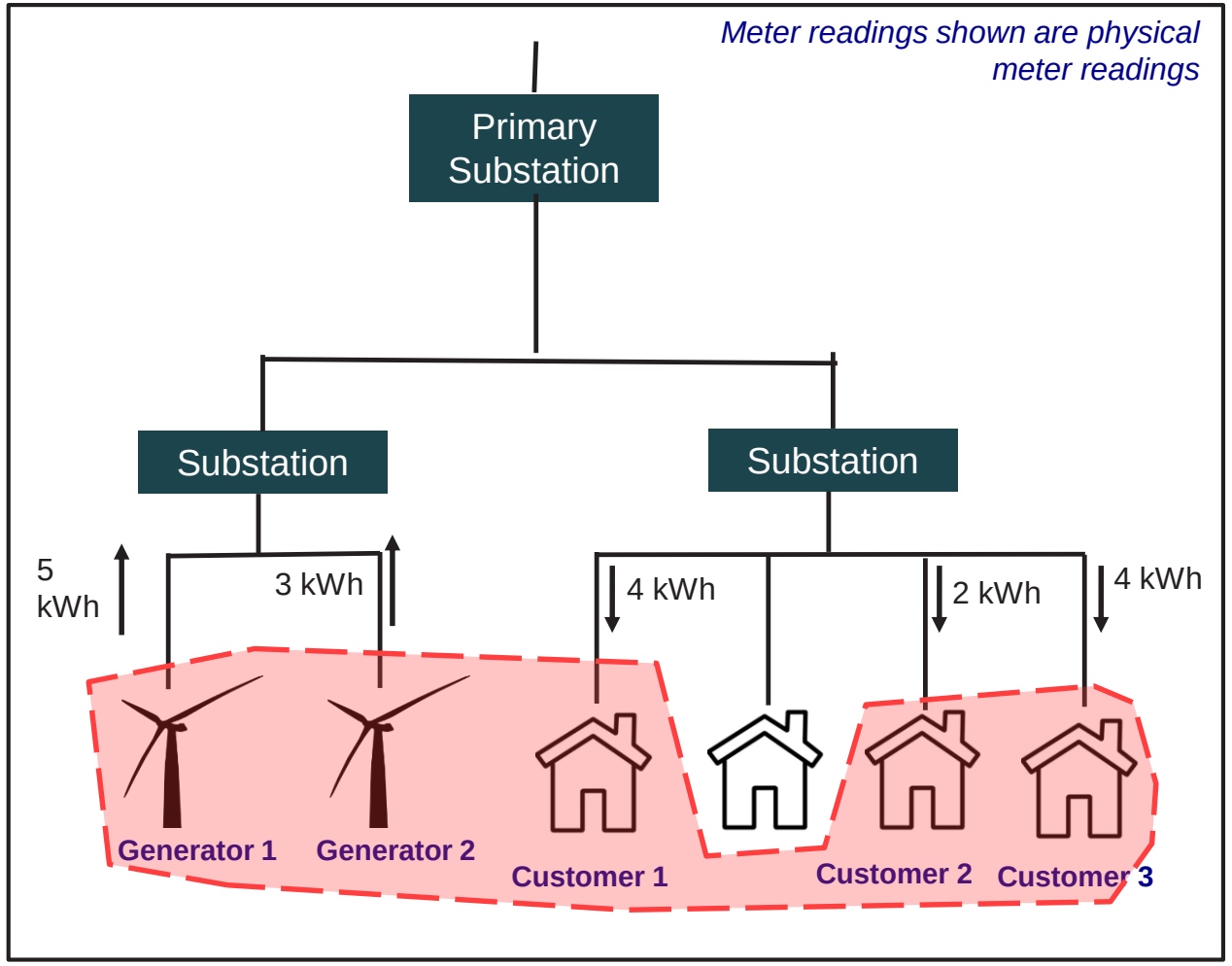
Therefore, for Measurement Classes ‘C’ and ‘E’ the D0036/D0275 data flows sent by the HHDC should be populated with:

- Net data (for flows sent to HHDA and Supplier)
- Gross data (for flows sent to LDSO)

Measurement Classes ‘F’ and ‘G’ are more problematic, because the LDSO receives consumption data from Settlement (which doesn’t have the gross metered data)

The proposed approach is to move this consumption data to a Measurement Class ‘C’ or ‘E’ Metering System (for purposes of reporting to the LDSO)

DUoS Charging Example



For Settlement purposes, this Complex Site is being settled using 'Option 4':

- The net flow (2 kWh Import) enters Settlement against Generator 1's MPAN
- Zero data enters Settlement for the other Metering Systems in the Complex Site

For DUoS purposes (assuming Generators are MC 'C' or 'E', but houses MC 'F'):

- 8 kWh Export sent to the LDSO on the Generators' Export MPANs
- 10 kWh Import sent to the LDSO, on the Generators' Import MPANs (not the Customers' MC 'F' MPANs)

Does this give the desired outcomes?

Are there likely to be issues with capacity charges?

What if there are no Measurement Class 'C' or 'E' MPANs in the Complex Site?

WHAT IS DEFINED AS LOCAL

What is defined as Local

- At a high level, some of the primary benefits a Class 5 Complex Site can deliver (via local balancing) are:
  - Helping to reduce network constraints
  - Encouraging shifts from peak load and reducing risk of imbalance
  - Helping to drive a smart network
  - Helping to move towards a zero carbon system

- These benefits are only realised where the scale of a Class 5 Complex site is limited to a “local” level. These benefits arguably do not extend to the differencing of Imports from Exports over a large geographical area.

- The Issue 88 Working group considered the following limitations that could be imposed on a Class 5 Complex Site to ensure that it would remain “local”
  - Option 1: All MSIDs within the Class 5 Complex Site to be located within a specific geographical area (within x square miles)
  - Option 2: All MSIDs within the Class 5 Complex Site to be located under the same **primary substation**
  - Option 3: All MSIDs within the Class 5 Complex Site to be located under the same GSP Group

- Whilst the Issue 88 working group identified that the criteria for defining local was ultimately an issue for the Workgroup to conclude, they did propose that Option 2 was the most sensible and viable option.

- The P441 proposal also intends the primary substation to be used as the criteria for determining what “local” means

Identifying Primary Substation

- There is currently no data item within the BSC or the REC Data Specification that identifies and records “Primary Substation Id”.
- As such, it is proposed that primary substation would be added to the Complex Site Supplementary Information Form (CSSIF) and its population made mandatory where the Class of the Complex Site was identified as “Class 5”.
- It is recognised that there is no standard naming convention across LDSOs in regards to Primary Substation Ids. As such the format of the “Primary Substation Id” field would be free text.
- For Class 1-4 Complex Sites, the SVA MOA is generally the party with the most technical knowledge of the Metering Equipment associated with the MSIDs comprised within a Complex Site. This is why responsibility for population and transmission of the Complex Site Supplementary Information Form has historically been the responsibility of the SVA MOA.
- It is recognised that Class 5 Complex Sites are arguably more commercial than technical in nature and comprise connections over a larger geographical area. As such the SVA MOA is likely to need assistance from the Supplier/scheme administrator to populate the CSSIF.
- Primary Substation Id is likely one of those data items within the CSSIF for a Class 5 Complex Site that the SVA MOA may need assistance from the Supplier/scheme administrator to populate.

WILL THE SITE ARRANGEMENTS BE FORWARD-LOOKING OR RETROSPECTIVE

Will the Site arrangements by forward-looking or retrospective?

- There are two main elements of the solution under P441 as proposed which could introduce retrospective requirements.
- Firstly, all Complex Sites will be assigned to a “class” dependent on certain criteria. This will mean all existing Registrants of Complex Sites will need to consider which “class” their current Complex Sites fall under.
- It is proposed that “class” will be added to the Complex Site Supplementary Information Form (CSSIF). Therefore there is a question as to whether P441 implementation would mandate the sending of a new CSSIF for all existing Complex Sites including the categorisation of the relevant applicable class.
- Given the CSSIF is not centrally held, and sending updated forms for all existing Complex Sites would be potentially resource intensive, it is not proposed to mandate a data cleanse as part of the P441 implementation approach.
- Instead it is proposed that following implementation, any transmission of the CSSIF for BAU purposes should include the relevant class on the CSSIF. This will allow a staggered data cleanse to take place whilst also encouraging Registrants and MOAs to ensure they consider what “class” existing Complex Sites will fall under.

Will the Site arrangements by forward-looking or retrospective?

- The second of element of P441 which should be considered under this terms of reference is the proposal to introduce a notification process for the purposes of creating a Central Register of Class 5 Complex Sites.

- In the second P441 Working Group it was agreed that SVA MOAs would include Elexon on the transmission of CSSIFs related to Class 5 Complex Sites. Elexon will then use these notifications to form a central register of Class 5 Complex Sites.

- Given the perceived low numbers of Class 5 Complex Sites currently operating in the market, and the benefits which a central register could deliver, it is proposed that all Registrants/SVA MOAs of Class 5 Complex Sites will be required to notify Elexon of each Class 5 Complex Site between any approval of P441 and the Implementation Date.

- This will allow a central register of current Class 5 Complex Sites to be implemented and available from the go live date of P441.

TERMS OF REFERENCE

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Workgroup's initial views on each ToRs

ToR	Details	Workgroup's views
a)	Are the six classes identified by the Issue 88 Group correct?	The Workgroup agreed to the six classes that were identified by the Issue 88 Group.
b)	Define the criteria a site must meet to qualify for each Complex Site Class?	The Workgroup noted that each Complex Site Class must have clearly outlined criteria, and agreed to the criteria Elexon suggested for each Complex Site.
c)	What MSIDs need to be registered for each Complex Site Class?	The WG concluded that three of the proposed four options should be progressed and the appropriate guidance made available to support parties when dealing with any of the options
d)	What form should a central register of Class 5 Complex Sites take?	The Workgroup welcomed the idea of creating and maintaining a central register for the purpose of recording information about a Class 5 Complex Site.
e)	How should the notification process of a Class 5 Complex Site operate?	The Workgroup noted that it was prudent for Elexon to be notified of any updates to a Class 5 Complex Site. They agreed that the REC should be updated to mandate that SVA MOA are responsible for notifying Elexon.
f)	**What impact do Class 5 Complex Sites have on Network Charges and BSC Charges?**	**The WG concluded that the existing gross import data (at BMU level) will be used to calculate charging for BSUoS and TNUoS. DUoS charging arrangement is still yet to be confirmed.**
g)	**Will the site arrangements be forward looking and not retrospective?**	
h)	**What should be considered as "Local" and "primary" substations?**	
i)	What impact will P441 have on the MHHS Programme?	WG views TBC

P441 standard Terms of Reference

ToR	Details	WG initial views
j)	How will P441 impact the BSC Settlement Risks?	
k)	What changes are needed to BSC documents, systems and processes to support P441 and what are the related costs and lead times? When will any required changes to subsidiary documents be developed and consulted on?	
l)	Are there any Alternative Modifications?	
m)	Should P441 be progressed as a Self-Governance Modification?	The Workgroup agreed that P441 should not be treated as a Self Governance Modification for the reasons outlined by the Proposed. Therefore, P441 will be submitted to Ofgem for decision.
n)	Does P441 better facilitate the Applicable BSC Objectives than the current baseline?	
o)	Does P441 impact the EBGL provisions held within the BSC, and if so, what is the impact on the EBGL Objectives?	
p)	What other industry Codes are impacted by P441	

A.O.B & NEXT STEPS

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AOB

- Confirm the schedule for the next (fifth) Workgroup meeting:
  - W/c 13 or 20 March 2023

Next steps

- Summary of Workgroup meeting decisions and actions by **Monday 27 February 2023**
- Elexon to schedule the fifth Workgroup meeting
- We are proposing to review the Terms of References below:
  - ToR (j) – Impact on BSC Settlement Risks
  - ToR (k) – Impact on BSC Documents, Systems and processes
  - ToR (o) – Impact on EBGL provisions
  - ToR (p) – What other industry Codes are impacted by P441

Progression plan

Event	Date
Present IWA to Panel	14 July 2022
Workgroup meeting 1	31 August 2022
Workgroup meeting 2	6 December 2022
Workgroup meeting 3	17 January 2023
Workgroup meeting 4	**21 February 2023**
Workgroup meetings 5 – 6	March – April
Assessment Procedure Consultation (15WDs)	April 2023
Workgroup meeting 7	W/C 22 May 2023
Present Assessment Report to Panel	8 June 2023
Report Phase Consultation	12 June – 23 June 2023
Workgroup meeting 8(Placeholder)	W/C 26 June 2022
Present Draft Modification Report to Panel	13 July 2023
Issue Final Modification Report to Authority	14 July 2023

MEETING CLOSE

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THANK YOU

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21 February 2023