

Sent by email to CCDGsecretary@elexon.co.uk

5 February 2021

Code Change and Development Group consultation on Market-Wide Half Hourly Settlement

Dear Sir/Madam,

The Smart Energy Code (SEC) Panel welcomes the opportunity to respond to this Code Change and Development Group (CCDG) consultation on the detailed Market-Wide Half Hourly Settlement (MHHS) Target Operating Model (TOM) design. This response has been informed by the expertise provided by the SEC Panel's Technical and Business Architecture Sub-Committee (TABASC).

Our review of the proposals set out in the consultation has focused on assessing the information provided in relation to specific design areas required to implement MHHS, including the essential high-level data items and processes needed to deliver the TOM.

We consider that the major changes to the SEC required to deliver the MHHS TOM have been identified but detailed work to assess the impact of these changes on DCC Systems remains ongoing. We anticipate that further development will need to take place as part of the MHHS Architecture Working Group's (AWG) work to define the data exchanges and end-to-end processes. Our expectation is that the identification of the detailed changes to all impacted industry Codes will follow this.

We have identified three key areas which need to be considered as the development of MHHS using Smart metering infrastructure progresses:

- 1) Governance of SEC changes:** We understand that once the detailed changes to the industry Codes have been finalised, Ofgem will make the required changes to the SEC using its powers set out in the Smart Meters Act, and therefore the changes will be developed outside of the SEC Modification Process. We request further detail regarding the approach to governance which will apply to the development and approval of these changes, and specifically what the role of the SEC Panel and its Sub-Committees will be.

- 2) Potential impact on billing and Smart services:** During its assessment of the impacts of implementing the MHHS TOM, the TABASC questioned whether it is possible for SEC Parties to successfully configure and operate Smart Metering Systems to provide Half Hourly (HH) data to Settlements without affecting their ability to bill consumers accurately or provide any other services which SMETS metering systems support. It is imperative that this point be determined. The TABASC will therefore undertake further work to identify the extent and impact of any issues and will work with Elexon and Ofgem to address any residual risks.
- 3) Technical clarifications:** Our review of the proposals set out in the consultation document has identified four points where we consider some of the detail provided is unclear, or possibly inaccurate. We seek further clarification regarding these points in order that we can assess whether each is accurate, and whether any inaccuracies could have a material impact on the implementation of the MHHS TOM or the existing Smart metering services.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the points raised in our response or have any queries, please contact Abhay Soorya on 020 3934 4203.

I confirm that this letter and its attachment may be published on Elexon's website.

Yours sincerely,

Peter Davies

SEC Panel Chair

Attachment

Code Change and Development Group consultation on Market-Wide Half Hourly Settlement

1) Governance of SEC changes

We understand that this consultation seeks the views of Code bodies and market participants on specific design areas required to implement the MHHS TOM and is not intended to address broader questions of how the changes to Industry Codes will be governed.

However, we would like to take this opportunity to request further detail regarding the approach the CCDG intends to take to identify and oversee the detailed drafting of the changes needed to Industry Codes to enable the TOM, along with the associated timeline. We also seek clarity of how cross-Code changes will be coordinated to ensure that the end-to-end technical, business, and regulatory arrangements work effectively.

We would also like to highlight that SECAS is a separate organisation to the Smart metering central systems delivery body (the DCC), with the latter being licenced and subject to price control by the Authority.

The SEC Modification process places obligations on the DCC to participate in the development of any changes to the SEC which will result in changes to DCC Systems, along with providing mechanisms for SEC Parties and the SEC Panel to provide input to the development of changes to DCC Systems to ensure solutions meet the needs of Users are cost effective and do not undermine the existing SEC Services.

We ask that the CCDG works with the SEC Panel and Ofgem to establish governance arrangements for the changes to the SEC required to implement MHHS which preserve the principles of the SEC Modification process.

2) Governance of the end-to-end MHHS arrangements

The work undertaken prior to this consultation to assess the impact of MHHS on the Smart metering architecture and identify any changes required to the SEC has focused on the DCC Total System. It has not considered all the impacts on the end-to-end business processes which SEC Parties will rely on to settle the data provided by Smart meters on a HH basis.

It is important to fully understand whether there will be any impacts on the end-to-end process that cannot be considered or addressed under the SEC. We wish to highlight that the TABASC will be publishing a survey to ascertain whether SEC Parties understand how to configure and

operate all types of SMETS meters operating in different modes to obtain the HH metered data for submission into Settlements, along with identifying any further issues Parties wish to raise with the TABASC for further consideration.

Any issues raised in response to this survey will be reviewed by the TABASC and assessed to determine whether they can be rectified under the SEC alone. Where any issues are identified as falling outside of the SEC arrangements, these will be referred to Ofgem to determine the appropriate solution or party to address them.

3) Technical clarifications

Our detailed review of the proposals set out in the CCDG consultation has identified four points where we consider the detail provided to be either unclear or possibly incorrect. We seek further clarification on these points:

I. Appendix A – Detailed design information (CCDG Recommendations on Industry Standing Data)

The table displaying Industry Standing Data in Appendix A refers to 'SMETS Version'. However, recent changes made to the way the Smart Metering Equipment Technical Specifications (SMETS) support different versions of each Device Type within each SMETS mean that instead of having a 'SMETS version', each SMETS has an effective from date with version numbers being applied to each Device Type within the SMETS.

We will continue to work with the CDDG to ensure that the detailed drafting of the Code changes make it clear that all SMETS and Device Type versions will be used to implement MHHS.

II. Appendix A – Detailed design information (MHHS – Smart meter MTD)

The passage relating to the Smart metering Meter Technical Details (MTDs) states:

“The purpose of this information flow is to pass attributes of the smart meter which will not change over time. There is no value in passing data attributes that may change over time by stakeholders other than the Metering Service as the Metering Service has not control or probably no knowledge of the changes. So, this flow of information is really seeking to capture the physical attributes of the metering equipment. These attributes are relevant when attending site, particularly when DCC communications have failed, but it is essential to have some information about the metering equipment that is being visited.”

We seek clarification regarding which MTDs may be used during a site visit when DCC communications have failed, along with how these are intended to be used. Whilst some MTD flows contain communication specific information, such as Communication Address/Method and Baud Rate, these attributes are all set to “NULL” for SMETS Meters.

III. Appendix B – CCDG discussion and rationales (CCDG Discussion on Consumption Component Classes)

The passage relating to how Consumption Component Classes (CCCs) may be used in relation to Smart metering states:

“The CCDG noted that the Data and Communications Company (DCC) currently derives the AI/AE indicator for its access regime using LLF Classes (LLFCs). The CCDG considered that this is not the most robust approach and that it would be better to use a registration data item.”

DCC Systems do not derive the AI/AE indicator using Line Loss Factor Classes (LLFCs). The registration data provided to DCC Systems by the Registration Data Providers (RDPs) does not contain LLFCs, but it does contain the direction of energy flow to or from the Metering Point to which the MPAN relates. DCC Systems depend on each Meter Point Administration Number (MPAN) being registered as either Import or Export, and we therefore agree that using registration data would be the best approach.

IV. Appendix B – CCDG discussion and rationales (Related MPANs and Market-wide Half Hourly Settlement)

The passage relating to new arrangements identified by the CCDG states:

“The CCDG noted that two meters can be contacted by the DCC using a single GUID. In such scenarios the HH data would need to be summated for Settlement.”

Two Electricity Meters cannot have the same GUID. A GUID is the unique identifier that DCC Systems use to recognise each Device. It is possible for a single MPAN to have two Electricity Smart Meters attached to it, but each Electricity Smart Meter would need to be contacted using its own unique GUID.