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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

INITIAL ASSESSMENT REPORT

R0018 – COMPLEX SITES PROCESS IMPROVEMENTS

DOCUMENT VERSION	1.0
DATE ISSUED	10/12/2021
DOCUMENT APPROVAL STATUS	APPROVED BY REC CHANGE PANEL
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

CHANGE OVERVIEW

This change proposes updates to the current Complex Sites Supplementary Information Form (CSSIF) in Schedule 14 – Metering Operations. It seeks to provide clear and concise guidance on the data needed when completing the form to help improve accuracy.

	High Impact: N/A
	Medium Impact: Electricity Suppliers, Electricity Metering Equipment Managers, Distribution Network Operators
	Low Impact: N/A

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1 SUMMARY

‘Complex Sites’ are defined as sites at which the Meter Technical Details are too complex to be captured in the standard D0268 ‘Half Hourly Meter Technical Details’ Market Message.

Balancing and Settlement Code (BSC) Procedure BSCP502 (‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’) and REC Schedule 14 (‘Metering Operations’) include provisions for ‘Complex Sites’, providing guidance and clarification on the appropriate Settlement arrangements for various types of complex site.

In recent years Elexon have received questions (from Energy Suppliers and other interested parties) on the scope of these arrangements. Confusion over the current Complex Site procedures was also identified as a key factor in the lessons learned session related to a high materiality BSC Trading Dispute.

Elexon Issue 88 (Clarification of BSC Arrangements relating to Complex Sites) was raised by Elexon to clarify the ambiguities and to identify process weaknesses and improvements. The Issue 88 Workgroup recommended a number of improvements to the Complex Site process, including mandating the use of the Complex Site Supplementary Information Form (CSSIF), clarifying the data/information to be shared (and when) and the creation of a new standardised CSSIF.

The Complex Sites process is consistent across REC Schedule 14 and BSCP502 (as it is a duplication of the process for MEMs and HHDCs); therefore, changes proposed to BSCP502 from Issue 88 will also need to be reflected in the REC.

2 PROBLEM STATEMENT

There is not a consistent understanding around the Complex Site process which can lead to the Complex Site Supplementary Information Form (CSSIF) being populated or interpreted differently by different parties. This may lead to incorrect data being used for consumer billing and Settlement, which can result in BSC Trading Disputes.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an electricity Consumer, I want my metering data to be accurate, to ensure my account is set up correctly and I receive accurate and timely invoices.
MARKET PARTICIPANT USER STORIES	
M1	As a Metering Equipment Manager, I want to have clarity around what data I need to send, when and how, to ensure I provide accurate data to other Market Participants
M2	As an Electricity Supplier, I want to receive accurate and complete Meter Technical Details to enable me to take appropriate action following a change of metering equipment, meter configuration or MEM.

M3	As an Electricity Distribution Network Operator, I want to receive accurate and complete Meter Technical Details to enable me to take appropriate action following a change of metering equipment, meter configuration or MEM.
M4	As a Half Hourly Data Collector, I want to receive accurate and complete Meter Technical Details to enable me to take appropriate action following a change of metering equipment, meter configuration or MEM.

4 IMPACTS

REC PARTIES AND SERVICE USERS
Electricity Suppliers
Metering Equipment Managers
Distribution Network Operators

REC SERVICE PROVIDERS
N/A

CONSUMERS
Electricity Consumers

REC DOCUMENTS / PRODUCTS
Schedule 14 – Metering Operations

RECCO AND REC CODE MANAGER
N/A

Further information can be found in the BSC Issue 88 Report

4.1 CROSS CODE IMPACTS

This Change Proposal is a consequential change following the conclusion of BSC Issue 88. A BSC Change Proposal will be raised to deliver corresponding changes to BSC Procedure BSCP502 ('Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'). The interdependency across the REC and the BSC means that the changes should be progressed in parallel in the interests of understanding and clarity for market participants. The REC Code Manager and Elexon will work together to ensure alignment of the consultation and implementation of the REC and BSC Change Proposals.

5 CHANGE PATH AND RESPONSIBLE COMMITTEE

CHANGE PATH	SELF-GOVERNANCE
RESPONSIBLE COMMITTEE	METERING EXPERT PANEL

We propose the Responsible Committee for this change should be the Metering Expert Panel as it impacts a Category 1 Product (Schedule 14 – Metering Operations) which is under the responsibility of the Metering Expert Panel.

6 PRIORITY STATUS AND URGENCY

PRIORITY STATUS	LOW
URGENCY	STANDARD

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PRIORITISATION MATRIX

Significance	Score	Weighting
Legal/Regulatory Compliance	0	30
Strategic Direction	1	20
Cost Benefits / Value	1	10
Consumer Impacts	1	30
Operational Efficiency	1	10

Weighted Significance Score	1
Urgency	0
Overall Priority Score	10
Effort	1 - Moderate

Urgency

3	N/A	13	23	33
2	02	12	22	32
1	01	11	21	31
0	00	10	20	N/A

Significance

Priority Score	Priority Status
23 - 33	Critical
13 - 22	High
11 - 21	Medium
00 - 10	Low

PRIORITY STATUS
Low

The Priority Status for this Change Proposal is 'Low based on a 'Weighted Significance' score of 1 and an 'Urgency' score of 0. This is broken down as below:

Legal/Regulatory Compliance – A score of 0 because this has no Legal/Regulation Compliance impacts.

Strategic Direction – A score of 1 because this change supports the wider industry objective towards improving data accuracy.

Consumer Impacts – A score of 1 due to the negative impacts consumers may experience if the data is incorrect.

Cost Benefits/Value – A score of 1 due to the negative impacts to billing and settlements if the data is incorrect.

Operational Effectiveness – A score of 1 because having correct data for REC Parties will reduce exceptions and improve efficiency.

Urgency:

This Change Proposal has been given an urgency score of score of 0 since there are no urgent requirements to implement the change.

7 SUMMARY OF CHANGE PROPOSAL PLAN

At this stage we expect that a standard 15 Working Day period for industry consultation will be sufficient and will be aligned with the consultation issued by Elexon for the BSC CP.

In order to achieve the alignment of dates between REC and BSC for the consultation we are propose an ex-committee review and approval of the Preliminary Change Report on 03 March 2022.

	FROM	TO
PARTY IMPACT ASSESSMENT ISSUED	20/01/2022	10/02/2022
PRELIMINARY CHANGE REPORT ISSUED	21/02/2022	21/02/2022
RESPONSIBLE COMMITTEE DECISION – EX-COMMITTEE	03/03/2022	03/03/2022
CONSULTATION	07/03/2022	01/04/2022
FINAL CHANGE REPORT ISSUED	29/04/2022	29/04/2022
RESPONSIBLE COMMITTEE DECISION	11/05/2022	11/05/2022
APPEAL WINDOW	13/05/2022	27/05/2022

8 GLOSSARY

TERM	DEFINITION
Balancing and Settlement Code (BSC)	means the Balancing and Settlement Code, as defined in the Electricity Supply Licences.
Complex Site Supplementary Information Form (CSSIF)	Appendix 2 and 3 Under Schedule 14 – Metering Operations
Distribution Network Operator (DNO)	means a person holding an Electricity Distribution Licence.
Half Hourly Data Collector (HHDC)	has the meaning given to that expression in the BSC.
Meter Point Administration Numbers (MPAN)	means the unique reference number used to identify electricity Metering Points.
Metering Equipment Managers (MEM)	means, as applicable, either: (a) for electricity, the Meter Operator Agent (as defined in the BSC) Appointed by an Electricity Supplier; or (b) for gas, the Meter Asset Manager (as defined in the UNC) Appointed by the Gas Supplier.
Retail Energy Code (REC)	means this Code, including its Schedules and the Technical Specification, maintained pursuant to the electricity supply licences granted under the Electricity Act 1989 and the gas supply licences granted under the Gas Act 1986, as such code is modified from time to time in accordance with its provisions.
Supplier Volume Allocation (SVA)	has the meaning given to it under the BSC.