

CMP430/431

Workgroup 3 Tuesday 19 March 2024

Online Meeting via Teams

WELCOME



Expectations of a Workgroup Member

Contribute to the discussion

Be respectful of each other's opinions

Language and Conduct to be consistent with the values of equality and diversity

Do not share commercially sensitive information

Be prepared - Review Papers and Reports ahead of meetings

Complete actions in a timely manner

Keep to agreed scope

Email communications to/cc'ing the .box email

Your Roles

Help refine/develop the solution(s)

Bring forward alternatives as early as possible

Vote on whether or not to proceed with requests for Alternatives

Vote on whether the solution(s) better facilitate the Code Objectives



Objectives and Timeline

Deborah Spencer – ESO Code Administrator



Objectives

- Introductions
- Action Review
- Terms of Reference Review
- Legal Text Update
- AOB
- Next steps

Action Review

3	WG2	Proposer	To speak with DCUSA about DCP 414 data (RFI directly to DNOs)	WG3	Open
4	WG2	Proposer	To consider including a definition for “domestic premise indicator” in the legal text	WG3	Open
5	WG2	Proposer	Consider if there is any insight available into impact of Triads over winter 2023 and if this has changed following implementation of the Targeted Charging Review (TCR)	WG3	Open

Workgroup Terms of Reference Review

- a) Consider EBR implications
- b) Consider interaction with the BSC legal text drafting as part of the MHHS Programme
- c) Identify the volume of customers who will experience a change in charging arrangements from pre MHHS migration to post MHHS migration, and consider the impact on those customers.
- d) Consider minimising or eliminating double charging
- e) Consider the impacts on the Market-wide Half Hourly Settlement (MHHS) Programme
- f) Consider the number of consumers impacted by each element of the defect and respective solution
- g) Consider implementation costs and timescales for all of industry
- h) Consider whether the solution should be enduring or time limited. If time limited, what should this relate to and what would charging arrangements revert to?



Numbers of Sites Impacted

Keren Kelly/Neil Dewar – Proposers

Number of Sites Impacted

Some groups of sites have been identified as being impacted through the proposed solution. The following sites will be subject to different charging arrangements and could be at risk of double charging:

- a. Sites that are settled as Measurement Class C pre-MHHS migration that will have a Domestic Premise Indicator = True post-MHHS migration
 - Not aware of any data that could currently inform how many of these sites there could be. How could the Workgroup get this information?
- b. Sites that are settled as Measurement Class A pre-MHHS migration that will have a Connection Type Indicator = L or H (meaning they are CT Metered) and a Domestic Premise Indicator = False post-MHHS migration
 - Some data relating to this has been used during P432 and DCP414 Modification reports

Sites Subject to Different Charging Arrangements specifically as a result of CMP430/431 Proposed Solution

What does data available under P432 and DCP414 tell us?

P432 – CT Advanced Meters moving from NHH to HH

P432 suggested around 50,000 impacted customers which was derived from data in 2018

Under P432, sites will move from MC A to MC F, C or E before Milestone 14

The direct impact from the CMP430/431 proposed solution would be to sites moving from MC A to being Non-Domestic and CT Metered post MHHS migration. This is a sub-set of sites within scope of P432.

DCP414 - Transitional Protection for NHH CT Customers

The number of customers identified as impacted by this change is circa 60,000

DCP414 puts in place protection for CT Metered sites that move from NHH to HH arrangements as a result of both P432 and MHHS Migration. The scope of sites impacted is wider for DCP414 than P432.

The direct impact from the CMP430/431 proposed solution would be to sites moving from MC A to being Non-Domestic and CT Metered post MHHS migration. This is a sub-set of sites reported in DCP414 data.

*Scope of CMP430/431 solution is from start of Charging Year April 2025

Sites at Risk of 'Double Charging'

Sites can be at risk of double charging if they move between the different demand locational charging methodologies at certain points within the same Charging Year.

Under the current CUSC baseline, the risk of double charging significantly increases from the start of MHHS migration (April 2025) as all NHH sites will become Half Hourly settled by definition.

Under the CMP430/431 Proposed solution, the risk of double charging reduces compared to the baseline, but there is still a risk that some sites will be double charged as some sites will be subject to different charging arrangements pre and post MHHS migration.



Legal Text Approach for review

Keren Kelly/Neil Dewar – Proposers

Options for Legal Text for CMP430 and CMP431

Option 1 – Include text in CUSC to specify segmentation between charging methodologies, replicating some of what is outlined in the MHHS BSC legal text drafting

Option 2 – Only include updates to definitions to reference to MHHS BSC legal text drafting directly

Existing CUSC Charging Methodologies

- The CUSC sets out different charging methodologies for Demand Locational charges:
 - Chargeable Demand Locational Capacity ('Triad'):
 - the average of the Supplier BM Unit's **half-hourly** metered gross demand during the Triad (£/kW)
 - Chargeable Energy Capacity ('4pm-7pm peak'):
 - the Supplier BM Unit's **non half-hourly** metered energy consumption over the period 16:00 hrs to 19:00 hrs inclusive every day over the Financial Year (p/kWh)
 - Chargeable Embedded Export Capacity:
 - the average of the Supplier BM Unit's **half-hourly** metered embedded export during the Triad

The CUSC does not define segmentation between half-hourly and non half-hourly using Measurement Class. However, Measurement Classes are used to describe data in different fields provided in the TUoS Report, or P0210.

- Measurement Classes are only referred to in CUSC (F and G) to describe special arrangements that are in place up to MHHS Milestone 15 to reduce the risk of a site being charged under both Triad and 4pm-7pm peak methodologies within the same Charging Year ('double charging').
- Double charging can occur when the settlement characteristics of a site cause it to move between the different demand locational methodologies at certain points in the Charging Year. Despite being settled half-hourly, the CUSC states that Measurement Classes F and G are treated as non half-hourly.
- Measurement Class as a data item will no longer exist in the new MHHS TOM and the CCC replacement is not identical and therefore cannot replicate the information the P0210 (TUoS File HH/NHH Split).

Option 1 - CUSC to Link to BSC

- Link to MHHS BSC legal text drafting which is being developed under the MHHS Programme and will be implemented through the Settlement Reform Significant Code Review (SCR). This will be based-lined under MHHS governance before the SCR Modifications are raised.
- BSC Code Mop Up Consultation 2 BSC – X-2 and Annex S-3 11.4.8 (*note drafting is not aligned to the MHHS design and ESO/Elexon fed back for this to be updated as part of the consultation)
- Replicate in CUSC and identify how Measurement Class will be treated in new arrangements (Similar Clause style), clarifying segmentation of sites between demand locational methodologies pre and post MHHS migration
- Add new definitions of Measurement Class and Connection Type to Section 11

Solution option progressed under CMP430 will impact CMP431 solution

We believe that new clauses and definitions will be required under Section 3 'Use of System' and Section 11 'Interpretations and Definitions' to ensure that the CUSC is fit for purpose for both non-migrated and migrated MPANs

[Link to CUSC Section 14.17.13 – Add to clauses \(suggested approach\)](#)

Option for Legal Text for CMP430 - for discussion

- For the relevant Charging Year until the relevant Meter Point Administration Number (MPAN) is subject to Migration to the Market Wide Half Hourly Settlement (MHHS) Programme Target Operating Model (TOM), it will continue to be charged TNUoS using the existing Charging Methodologies by Measurement Class. This will be as defined in CUSC (new definition) and BSC.(Existing definitions A-G)
- From the relevant point during the Charging Year that the relevant Meter Point Administration Number (MPAN) has Migrated to the Market Wide Half Hourly Settlement (MHHS) Programme, Target Operating Model (TOM), will be charged TNUoS using the existing Charging Methodologies. This will be as per the new definitions in CUSC (2c?) SC (Measurement Class for MHHS Metering Systems) [Using the logic that was agreed in CR032] [Once corrected]

Domestic/Non Dom	Connection Type Indicator	Possible Charging Arrangements (Post Migration)	Current Arrangements (Measurement Class and Charging)
Domestic	All	4pm-7pm	A 4pm-7pm F 4pm-7pm C Triad
	WC (Whole Current)	4pm-7pm	G 4pm-7pm A 4pm-7pm
Non-Domestic	L (LV with Current Transformer)	Triad	C Triad E Triad A 4pm-7pm
	H (HV with Current Transformer)	Triad	C Triad E Triad A 4pm-7pm
	E (EHV with Current Transformer)	Triad	C Triad E Triad
	U (Unmetered)	Triad	D (all UMS will be moved from MC B pre-migration) Triad

- Should an Meter Point Administration Number (MPAN) be subject to Reverse Migration during within the timelines of the Market Wide Half Hourly Settlement (MHHS) Programme, it will revert to be charged TNUoS on the existing definitions of Measurement Class, until such time that the MPAN is re-introduced to the TOM, whereby it will be charge TNUoS on the new arrangements.

Introduce Measurement Class to CUSC S11 (Part 1) CMP431

- Introduce “Measurement Class” into CUSC –:
 - “A classification of Metering Systems which indicates how Consumption is measured i.e
 - Non Half Hourly Metering Equipment (equivalent to Measurement Class “A”)
 - Non Half Hourly Unmetered Supplies (equivalent to Measurement Class “B”)
 - Half Hourly Metering Equipment at above 100kW Premises (equivalent to Measurement Class “C”)
 - Half Hourly Unmetered Supplies (equivalent to Measurement Class “D”)
 - Half Hourly Metering Equipment at below 100kW Premises with current transformer (equivalent to Measurement Class “E”)
 - Half Hourly Metering Equipment at below 100kW Premises with current transformer or whole current, and at Domestic Premises (equivalent to Measurement Class “F”)
 - Half Hourly Metering Equipment at below 100kW Premises with whole current and not at Domestic Premises (equivalent to Measurement Class “G”).”

Introduce Measurement Class to CUSC S11 (Part 2a) (CMP431)

- Amend CUSC to align with MHHS Pre Migration state BSC -
- Measurement Class for **Non-MHHS Metering Systems**
- A classification of Metering Systems which indicates how Consumption is measured i.e.
- Non Half Hourly Metering Equipment (equivalent to Measurement Class “A”)
- Non Half Hourly Unmetered Supplies equivalent to Measurement Class “B”)
- Half Hourly Metering Equipment at above 100kW Premises (equivalent to Measurement Class “C”)
- Half Hourly Unmetered Supplies (equivalent to Measurement Class “D”)
- Half Hourly Metering Equipment at below 100kW Premises with current transformer (equivalent to Measurement Class “E”)
- Half Hourly Metering Equipment at below 100kW Premises with current transformer or whole current, and at Domestic Premises (equivalent to Measurement Class “F”)
- Half Hourly Metering Equipment at below 100kW Premises with whole current and not at Domestic Premises (equivalent to Measurement Class “G”).

Introduce Measurement Class to CUSC S11 (Part 2b) (CMP431)

- Amend CUSC to align with MHHS Post Migration state BSC - we believe this is wrong and will be corrected
- Measurement Class for MHHS Metering Systems
- The Measurement Class is only required for the purpose of creating the TUoS Report, and is derived from data held in SMRS as set out below:
- Measurement Class C*: Domestic Premise Indicator = F and Connection Type Indicator = L,H or E
- Measurement Class D: Domestic Premise Indicator = T and Connection Type Indicator = U
- Measurement Class E*: always 0kWh
- Measurement Class F: Domestic Premise Indicator= T and Connection Type \neq U
- Measurement Class G: Domestic Premise Indicator = F and Connection Type = W *Measurement Class C will contain the sum of Measurement Classes C and E.

Introduce Measurement Class to CUSC S11 (Part 2C – Possible) (CMP431)

- Amend CUSC to align with MHHS Post Migration state BSC -
- **MHHS** Measurement Class for **MHHS Metering Systems** (Using the logic that was agreed in CR032) :-
 - Measurement Class A: will not be derived for migrated MPANs, as they will be half-hourly
 - Measurement Class B: will not be derived for migrated MPANs, as they will be half-hourly
 - Measurement Class C: will report the sum of Measurement Classes C and E*, which will be determined as 'all migrated MPANs with Domestic Indicator = N and Connection Type = L, H or E'
 - Measurement Class D: will be determined as 'all migrated MPANs with Domestic Indicator = N and Connection Type = U'
 - Measurement Class E will be set to "0MWh" for migrated MPANs* (see Measurement Class C above)
 - Measurement Class F: will be determined as 'all migrated MPANs with Domestic = Y and Connection Type ≠ U'
 - Measurement Class G: will be determined as 'all migrated MPANs with Domestic = N and Connection Type = W'

Link other new BSC terms to CUSC S11 Changes (Part 1)

CMP431

- Introduce “Domestic Premises” **Indicator** to CUSC
- Introduce “ Connection Type **Indicator** to CUSC



Any Other Business

Deborah Spencer – ESO Code Administrator

AOB

Workgroup 4 Thursday 28 March 2024 (2-5pm)

Timeline for CMP430 – Updated after CUSC Panel (23 February 2024)

Milestone	Date	Milestone	Date
Modification presented to Panel	23 February 2024	Code Administrator Consultation (6 working days)	10 June 2024 to 14 June 2024
Workgroup Nominations (4 Working Days)	23 February 2024 to 29 February 2024	Draft Final Modification Report (DFMR) issued to Panel (4 working days)	24 June 2024
Ofgem grant Urgency	29 February 2024 (5pm)	Panel undertake DFMR recommendation vote	28 June 2024
Workgroup 1 to 7 (assuming Ofgem have granted Urgency)	06 March 2024 11 March 2024 13 March 2024 – cancelled 19 March 2024 28 March 2024 05 April 2024 15 April 2024	Final Modification Report issued to Panel to check votes recorded correctly	28 June 2024
Workgroup Consultation (5 working days)	17 April 2024 – 24 April 2024	Final Modification Report issued to Ofgem	28 June 2024
Workgroup 8 to 14 - Assess Workgroup Consultation Responses and Workgroup Vote	29 April 2024 03 May 2024 08 May 2024 13 May 2024 20 May 2024 24 May 2024 30 May 2024	Ofgem decision	30 September 2024
Workgroup Report issued to CUSC dot box	03 June 2024	Implementation Date	01 April 2025
Workgroup Report presented to Special Panel (Panel agree Workgroup report has met its Terms of Reference)	07 June 2024		



AOB

Deborah Spencer – ESO Code Administrator



Appendix

Charging Modification (CMP430) Proposed Solution

- ESO propose to amend CUSC to maintain the current charging methodologies and segment customers by the new MHHS data items that make up the P0210 report as a result of approval of Change Request (CR) 32 in the MHHS Programme.
- The proposed solution would mean that sites would be segmented between the two methodologies for Charging purposes, using the new MHHS Design Data items – i.e. Domestic and Connection Type Indicators, once they have been migrated. Connection Type Indicator is defined under Industry Standing Data (ISD): MHHS Entities Data Items as ISD Entity ID M2
- The proposal is to align the CUSC to the relevant Balancing and Settlement Code (BSC) Sections and definitions to state that:
 - Pre MHHS migration, a site will be charged under the existing arrangements; and
 - Post MHHS migration, a site will be charged based on logic derived from the Connection Type Indicator and Domestic Premise Indicator

- The following table sets out the detail of the proposed arrangements:

Domestic/Non Dom	Connection Type Indicator	Possible Charging Arrangements (Post Migration)	Current Arrangements (Measurement Class and Charging)
Domestic	All	4pm-7pm	A 4pm-7pm F 4pm-7pm C Triad
	WC (Whole Current)	4pm-7pm	G 4pm-7pm A 4pm-7pm
Non-Domestic	L (LV with Current Transformer)	Triad	C Triad E Triad A 4pm-7pm
	H (HV with Current Transformer)	Triad	C Triad E Triad A 4pm-7pm
	E (EHV with Current Transformer)	Triad	C Triad E Triad
	U (Unmetered)	Triad	D (all UMS will be moved from MC B pre-migration) Triad