

## Responses to ECO3 methodologies for calculating electricity and gas supply volumes consultation

The ECO3 methodologies for calculating electricity and gas supply volumes consisted of one question:

**Q1. Do you know of any other considerations relating to calculation of electricity or gas supply volumes that we should be aware of that would help us to clarify the guidance? If so, set out any examples, and provide supporting evidence as required.**

Set out below are the responses received.

### Elexon

We believe the data required for the electricity calculation can be determined from the D0030 'Aggregated DUoS Report'. This is because the file contains meter data sorted by LLF Class Identifier (LLFCid) for each GSP Group (GSPG).

However, if you wish to use the D0296 'Supplier BM Unit Report' data, you should select the Aggregated BMU Energy (per GSP Group) data for the appropriate Consumption Component Classes (CCCs). Note this is the uncorrected version of the data as would be derived from the D0030.

The CCCs are set out in Annex X2 of the BSC. Table X-8 on page 83 sets out the CCCs mapped to the Measurement Classes. Measurement Class F is covered by CCCids '42' to '53'. Where CCCid '42' is active Import consumption based on actuals and CCCid '45' is Active Import Consumption based on estimates. We believe both these CCCs are required for your calculation.

The consultation refers to CCCid '36', which as you will see from the table relates to active export data based on actual consumption for customers in and Measurement Class E (Half Hourly Metering Equipment at below 100kW Premises with current transformer).

Both Measurement Class C (>100 kW) and Measurement Class E could potentially have some small volumes of domestic data but there is no way to split the data out of BSC data flows.

It should also be noted that under the ongoing work on the Settlement Reform SCR (Market Wide Half Hourly Settlement (MHHS)) these Measurement Classes and CCCs are likely to be

changed. In the next phase of detailed design work under the ELEXON-led expert groups (the Code Change and Development Group), we will be considering a rationalisation of Measurement Classes and CCCs for the new Target Operating Model (TOM). Therefore, further changes are likely to be needed to ECO3 calculation methodology, when MHHS is implemented.

Guidance should also be provided on the Settlement or reconciliation run type for which the consumption is to be calculated. This could be a single run type or latest available run type.

### **Additional comments**

We have previously provided help to Ofgem on interpreting data for the ECO obligation. We have identified some issues with your proposals in the consultation. These are highlighted in the answer to Question 1 attached below. The background for the issues is based on two BSC Modifications as follows:

- BSC Modification P300 introduced new Measurement Classes for elective Half-Hourly Settlement:
  - o Measurement Class "F" Half Hourly Metering Equipment at below 100kW Premises with current transformer or whole current, and at Domestic Premises
  - o Measurement Class "G" Half Hourly Metering Equipment at below 100kW Premises with whole current and not at Domestic Premises
- BSC Modification P339 introduced new Consumption Component Classes (CCCs) that map to the above new Measurement Classes. In order to provide data for network changing the elective HH data is split out on the D0030 'Aggregated DUoS Report' using a mapping to the Line Loss Factor Class Ids (LLFCid) used to identify Distribution Tariffs.

Meter Data for the Low Voltage (LV) Domestic tariff is split out by LLFCid for each Grid Supply Point Group (GSPG). Therefore, we believe the data you require is already available on the D0030. Furthermore, we believe the consultation identifies the wrong CCCid '36' which is for Measurement Class E and relates to Active Export volume settled on actual readings. We believe you need CCCid '42' and '45'. More information is provided in response to the consultation question.

## **SSE**

Thank you for the opportunity to respond to Ofgem’s consultation on changes to the methodologies for calculating gas and electricity supply volumes. We welcome Ofgem’s proposed amendments to the annual supply volume methodologies which we believe will enable consistency in reporting annual supply volumes thereby, appropriately apportioning obligations to be delivered by individual participants.

Regarding the proposal to amend the methodology for calculating electricity supply volumes to include Profile Class 00, we agree that any domestic supply on this Profile Class should be included for obligation setting. However, as we have already communicated, we believe Profile Class 00 consumption component code 36 is the incorrect code. Our research of the latest published information suggested that Profile Class 00 consumption component codes 42 and 45 are more appropriate for identifying domestic supply (we note that consumption component code 45 is estimated supply, however this is still relevant for smart meters, for example when there are communication errors from the Data Communications Company).

We request that Ofgem clarify which are the correct consumption component codes to be used to identify all domestic supply volumes under Profile Class 00, prior to the February 2020 annual notification deadline.

## **Scottish Power**

Thank you for the opportunity to respond to the above consultation which seeks views on Ofgem’s proposed changes to methodologies for calculating electricity and gas supply volumes for ECO3.

In relation to gas supply volumes, we welcome Ofgem’s clarification over the use of Rolling AQ as the source for calculation, and would note that this is in line with how we currently calculate gas supply volumes.

Ofgem’s proposals to extend the calculation methodology for electricity supply volumes should provide a more accurate representation of domestic electricity supply volumes, although we would note that at present we have a limited number of domestic customers who are not captured by the existing methodology.

We do not however agree with the proposal to use Consumption Component Class 36 for calculating the kilowatt hours (kWh) for any domestic customers who are supplied through Profile Class 00. Consumption Component Class 36 is an export Consumption Component Class associated with Measurement Class E (non-domestic), as defined in Annex X-2 of the Balancing and Settlements Code (BSC). We believe that using Profile Class 00 with Consumption Component Classes 42 and 45, associated with Measurement Class F (domestic), would be more appropriate, and propose that Ofgem updates its methodology accordingly.

If Ofgem adopts our proposal to use Consumption Component Class 42 and 45, we are satisfied that we would be able to use the D0296 'Supplier BM Unit Report' data flow to identify the kWh for Profile Class 00 customers. We note that Ofgem highlights that Profile Class 00 may contain a mixture of domestic and non-domestic customer supply volumes. We believe that our proposal should only return domestic customer supply volumes for all suppliers, given that it uses domestic Measurement Class F. We note that there may be instances where non-domestic volumes are included in the data flow, however we are satisfied that we will be able to implement a methodology to adjust the volumes as required prior to submission.

## **Npower**

This is to confirm that we have reviewed the consultation "Energy Company Obligation (ECO3) methodologies for calculating electricity and gas supply volumes" and at this stage we have no comments to make.

## **EDF Energy**

In response to the consultation referred to above, EDF Energy are aware of no issues relating to the proposed changes in the calculation of the supply volumes, for both electricity and gas, as set in the consultation document. However, should these proposals change as a result of this consultation we would need clarity from Ofgem as early as possible prior to 1 February in order to assess any impacts on our reporting processes.