SVG77/04

Meeting name	Supplier Volume Allocation Group (SVG)
Date of meeting	3 July 2007
Paper title	Change Proposal Progression
Purpose of paper	For Decision
Synopsis	This paper presents 9 Change Proposals that have been progressed in accordance with BSCP40 'Change Management' and requests agreement on their progression. This paper details the status of all Open Draft Change Proposals (DCPs) and Change Proposals (CPs).

1 Introduction

1.1 This paper presents 9 Change Proposals (CPs) to the Supplier Volume Allocation Group (SVG) for its consideration and agreement on progression. These CPs have been assessed by ELEXON and has undergone Impact Assessment (IA) by parties and Party Agents. In Light of the assessments ELEXON has prepared recommendations and decisions are sought to whether these CPs should be progressed.

1.2 The paper also provides details of all open Draft Change Proposals (DCPs) and Change Proposals (CPs) and their status within the Change Process.

1.3 Since the SVG meeting on 05 June 2007 (SVG76) 1 new DCP has been raised, 1 DCP is owned solely by the SVG, no DCPs are solely owned by the Imbalance Settlement Group (ISG) and 2 DCPs are co-owned by the ISG and SVG. Details of these changes can be found in Appendix 10.

1.4 Since the SVG meeting on 05 June 2007 (SVG76) no new CPs have been raised, 19 CPs are owned solely by the SVG, 1 CP is solely owned by the Trading Disputes Committee (TDC), 1 CP is solely owned by the ISG and 6 CPs are co-owned by the ISG and SVG. Details of these changes can be found in Appendix 10.

2 Summary of Change Proposals for Progression

2.1 <u>CP1182 v3.0 - Creation of a generic Party Service Line</u>

2.1.1 CP1182 'Creation of a generic Party Service Line' was raised on 8 December 2006 by ELEXON. This CP seeks to create a generic Party Service Line (PSL) that will contain participant's non-functional requirements, which are set out in the current PSLs. This will result in Parties and Party Agents only needing to look at one document to find the requirements for a particular aspect of their role.

2.1.2 CP1182 v1.0 was issued for participant Impact Assessment on 8 December 2006 as part of CPC00594. CP1182 v2.0 was subsequently drafted as a result of comments received during Impact Assessment, and was issued for further assessment as part of CPC00596.

2.1.3 CP1182 v2.0 was presented to the ISG and SVG, on 20 and 27 March respectively, for approval. After discussion the ISG and SVG decided to remove the inclusion of Suppliers from the scope of the generic PSL. Consequently, CP1182 v3.0 was drafted and issued for assessment on 4 May 2007 as part of CPC00604. In response to CPC00604 15 responses were received of which 14

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agreed and 1 remained neutral. Implementation in the November 2007 Systems Release was acceptable to all respondents.

2.1.4 ELEXON's recommendation, based on responses from the Industry is that CP1182 v3.0 be approved for inclusion in the November 2007 Release.

2.2 CP1189 – Change to allow SVA Line Loss Factors less than one

2.2.1 CP1189 was raised on 4 May 2007 by United Utilities and seeks to make amendments to BSCP28 to allow SVA Line Loss Factors (LLFs) of less than one.

2.2.2 When a new generator or demand customer enters the market they must be given a LLF by the host Licensed Distribution System Operator (LDSO) for use in Settlement. Currently, under the present system the only option available to the LDSO is to assign a LLF of unity (1.000). It is understood that this restriction was included in BSCP528 on the assumption that the connection of a generator to the network would always reduce losses on the network. However in situations where there are large amounts of generation, with only a small amount of demand, the opposite is true and the additional generation actually increases distribution network losses.

2.2.3 CP1189 was issued on 4 May 2007 as part of CPC00604. 14 responses were received of which 9 agreed, 3 disagreed and 2 were neutral to the change.

2.2.4 ELEXON's recommendation, based on responses from the Industry, is that CP1189 be approved for inclusion in the November 2007 Release.

2.3 CP1190 – Recommended Changes following an Operational Review of MDD Processes

2.3.1 At the meeting of the SVG on 2 May 2006, the SVG agreed that an operational review of the MDD process should be carried out. The review process identified a number of changes to BSCP509 to ensure that the requirements are streamlined, and that forms set out in BSCP509 are efficient and consistent with the information in the MDD database.

2.3.2 CP1190 was raised on 4 May 2007 by ELEXON to resolve these issues. CP1190 was issued on 4 May 2007 as part of CPC00604. 11 responses were received of which 8 agreed, 0 disagreed and 3 were neutral to the change

2.3.3 ELEXON's recommendation, based on responses from the Industry, is that CP1190 be approved for inclusion in the November 2007 Release.

2.4 CP1191 – Amendment of SVAA Service Line SSL330 to bring it in line with current contract arrangements

2.4.1 CP1191 was raised on 4 May 2007 by ELEXON and seeks to make amendments to the SVAA Service Line SSL330 to bring it in line with current contract arrangements.

2.4.2 Changes to the Supplier Volume Allocation Agent (SVAA) contract arrangements have created a misalignment between the contract arrangements and the SVAA Service Line SSL330. This has necessitated amendments to SSL330 to bring it in line with the existing contract arrangements. The main areas of misalignment include the ad-hoc reporting service and the acceptance testing service requirement.

2.4.3 CP1191 proposes changes to SSL330 that are needed to align it with the contract arrangements to ensure there is no potential for the SVAA to misinterpret their obligations and that there are no conflicting requirements on the SVAA.

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2.4.4 CP1191 was issued on the 4 May 2007 as part of CPC00604. 9 responses were received of which 6 agreed, 0 disagreed and 3 were neutral to the change

2.4.5 ELEXON's recommendation, based on responses from the Industry, is that CP1191 be approved for implementation on 23 August 2007.

2.5 CP1193 – Recommended changes following an operational review of BSCP38 – 'Authorisations'

2.5.1 CP1193 was raised on 4 May 2007 by ELEXON and seeks to make recommended changes to BSCP38 'Authorisations' following an operational review and concerns raised by the Central Registration Agent (CRA) and BSC Parties undertaking the Authorisations process regarding clarity and duplication in the process.

2.5.2 BSCP38 'Authorisations' defines the processes under which Authorised Persons are registered and how these records are amended. The Procedure ensures that the BSC Agent and ELEXON only carry out specific Code activities on the request of an Authorised Person.

2.5.3 CP1193 seeks to streamline the current BSCP38 processes where they are unnecessarily burdensome on participants. A single authorisation register will be created that will reduce confusion experienced by Parties when submitting forms for two separate registers. In turn, this should reduce the number of BSCP forms that are rejected on the basis of the submitting person being authorised on the wrong register.

2.5.4 CP1193 was issued for participant Impact Assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which 9 agreed and 3 were neutral to the change.

2.5.5 ELEXON's recommendation, based on responses from the Industry, is that CP1193 be approved for inclusion in the November 2007 Release.

2.6 CP1194 – Publication of Authorised Person's data on the BSC website

2.6.1 CP1194 was raised on 4 May 2007 by ELEXON and seeks to grant BSC Parties easy access to their companies' list of Authorised Signatories, enabling them to carry out obliged activities under the Code more efficiently.

2.6.2 CP1194 proposes that Party and Party Agents wishing to publish its Authorised Persons list on the BSC website can do so, provided they give formal authorisation expressing their consent that ELEXON can disclose such personal data regarding it and its employees to third parties.

2.6.3 CP1194 was issued for participant Impact Assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which 7 agreed, 2 disagreed and 3 were neutral to the change. One of the respondents who disagreed with the change subsequently changed their response to 'neutral' after discussion with ELEXON.

2.6.4 ELEXON's recommendation, based on responses from the Industry, is that CP1194 be approved for inclusion in the November 2007 Release.

2.7 CP1195 – Amendments to BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes' and BSCP38 'Authorisations' with regard to Category I Authorised Signatories

2.7.1 CP1195 was raised on 4 May 2007 by ELEXON and seeks to make amendments to BSCP27 and BSCP38 with regard to Category I Signatories.

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2.7.2 There is a requirement for the Central Volume Allocation (CVA) Registrant's Authorised Signatories (Category I) to sign the notification form to the Technical Assurance Agent (TAA) and Meter Operator Agent (MOA) confirming acceptance of an impending inspection visit (BSCP27). There is no step within BSCP38 for the CRA or ELEXON to provide this Category I information to the TAA, so the TAA is unaware of whom the Authorised Signatories are and therefore is unable to check this information. However, as a representative of the MOA would always accompany the TAA on site there is no risk to Settlement.

2.7.3 As there is no risk to Settlement, CP1195 proposes to remove Category I from BSCP38 and references to an Authorised Signatory from BSCP27. The removal of references to an Authorised Signatory from BSCP27 would not preclude the CVA Registrant from their responsibility to send electronic acceptance of the inspection visit to the TAA and MOA.

2.7.4 CP1195 was issued for participant Impact Assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which 6 agreed, 2 disagreed and 4 were neutral to the change. One of the respondents who disagreed with the change subsequently changed their response to 'neutral' after discussion with ELEXON.

2.7.5 ELEXON's recommendation, based on responses from the Industry, is that CP1195 be approved for inclusion in the November 2007 Release.

2.8 <u>CP1196 – Changes to incorporate Central Management Systems in Unmetered Supplies arrangements.</u>

2.8.1 CP1196 was raised on 4 May 2007 by ELEXON and seeks to include Central Management Systems (CMS) in the Unmetered Supplies (UMS) arrangements.

2.8.2 Various manufacturers have developed new technologies which allow certain forms of equipment categorised as UMS in the BSC Arrangements to be controlled in a more dynamic way. These technologies, known as CMS, provide customers with greater control over the operation of the supply, allowing both the equipment's switching times and power loads to be controlled down to each half hour period. This level of control offers the potential for customers to make significant energy savings, helping to meet increasingly tight regulations on energy consumption and carbon emissions.

2.8.3 CP1196 proposes a number of changes that would need to be made to incorporate CMS in the UMS arrangements. The changes were proposed by the CMS Review Group, which was established by the SVG.

2.8.4 CP1196 was issued for Impact Assessment as part of CPC00600 as DCP0001. It was subsequently converted into CP1196 and was issued for participant Impact Assessment on 4 May 2007 as part of CPC00604. 17 responses were received of which 11 agreed, 2 disagreed (though following discussion one of these respondents agreed the change) and 4 were neutral to the change.

2.8.5 ELEXON's recommendation, based on responses from the Industry is that CP1196 be approved for inclusion in the February 2008 Release.

2.9 <u>CP1200 Removal of requirement for Proving Test Out of Timescale Escalation Report</u>

2.9.1 CP1200 was raised by Scottish and Southern Energy on 4 May 2007 and seeks to remove the requirement for the Proving Test Out of Timescale Escalation Report.

2.9.2 BSCP502, 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS', states that 'If the Half Hourly Data Collector (HHDC) receives the Meter Technical Details (MTD), via receipt

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of the D0268 Half Hourly Meter Technical Details and knows that a proving test should have been performed, but no successful proving test has been initiated by the MOA, the HHDC shall report this to the MOA, the Supplier and BSCCo' This is accomplished using the P0212 'Notification of Failure to Carry Out Proving Test' flow. This report requirement is also included in BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'.

2.9.3 When BSCP514 was produced, there were issues surrounding MOAs initiating proving tests. Therefore the obligation to send the P0212 when a proving test has not been performed was included in BSCP502 to facilitate supplementary monitoring carried out by ELEXON. A related CP in the form of CP1173 'Proving Test Out of Timescale Escalation Report' was implemented as part of the June 2007 Release which removed the requirement to send a copy of the Report to ELEXON. Industry response to CP1173 and subsequent discussion at the Supplier Agent Forum (SAF) indicates that a number of Agents do not and have never run this Report, therefore the situation has improved without the use of the process.

2.9.4 CP1200 seeks to remove the requirement to send the P0212 from BSCP502 and BSCP514. CP1200 also seeks to remove the P0212 data flow from the SVA Data Catalogue Volume 1 and the 'Expected Proving Test Completion Data' and 'HHMO Responsible for Metering System' from the P0212 data flow from the SVA data Catalogue Volume 2.

2.9.5 CP1200 was issued for participant Impact Assessment on 4 May 2007 as part of CPC00604. 13 responses were received of which 10 agreed, 0 disagreed and 3 were neutral to the change.

2.9.6 ELEXON's recommendation, based on responses from the Industry is that CP1200 be approved for inclusion in the November 2007 Release.

2.10 Implementation Costs

	Service Provider	Other Demand Led	ELEXON Operational		Total		Impacts
	Cost	Cost	Man Days	Cost	Cost	Tolerance	
CP1182 v3.0	£0	£0	0.5	£110	£110	10%	Generic PSL
CP1189	£0	£0	4	£880	£880	10%	BSCP528
CP1190	£0	£0	6	£1,320	£1,320	10%	BSCP509, BSCP509 MDD Entity Forms, BSCP537
CP1191	£0	£0	0.5	£110	£110	10%	SSL330
CP1193	£11,621	£0	32	£7,040	£18,661	10%	BSCP38, Interface Specification Part 1, Interface Specification Part 2, IDD

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	Service Provider	Other Demand Led	ELEXON Operational		Total		Impacts
	Cost	Cost	Man Days	Cost	Cost	Tolerance	
							Part 1
CP1194	£0	£0	24	£5,280	£5,280	10%	BSCP38
CP1195	£859	£0	1	£220	£1.079	10%	BSCP27, BSCP38, Interface Specification Part 1, IDD Part 1
CP1196	£0	£0	4	£880	£1,100	10%	BSCP520, PSL170, SVA DC
CP1200	£0	£0	3	£660	£880	10%	BSCP502, BSCP514, SVA DC vol. 1 SVA DC vol. 2

3 Recommendations

3.1 The SVG is invited to:

a) **Approve** CP1182 v3.0 for implementation in the November 2007 BSC Systems Release;

b) **Approve** CP1189 for implementation in the November 2007 BSC Systems Release;

c) **Approve** CP1190 for implementation in the November 2007 BSC Systems Release;

d) **Approve** CP1191 for implementation on 23 August 2007;

e) **Approve** CP1193 for implementation in the November 2007 BSC Systems Release;

f) **Approve** CP1194 for implementation in the November 2007 BSC Systems Release;

g) **Approve** CP1195 for implementation in the November 2007 BSC Systems Release;

h) **Approve** CP1196 for implementation in the February 2008 BSC Systems Release;

i) **Approve** CP1200 for implementation in the November 2007 BSC Systems Release; and

j) **Note** the status of all open Draft Change Proposals and Change Proposals

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Appendix 1 - Detailed Analysis of CP1182 v3.0

1 Introduction

1.1 CP1182 'Creation of a generic Party Service Line' was raised by ELEXON on 8 December 2006.

1.2 The Code Subsidiary Document (CSD) review has highlighted that there is a large amount of duplication between the requirements contained in Party Service Lines (PSLs) and the corresponding Balancing and Settlement Code Procedures (BSCPs).

1.3 During a consultation as part of the CSD review, industry participants were asked whether the non functional requirements of PSLs should be merged into the appropriate BSCP and a single PSL created containing non functional requirements relevant to all Party Agents. The majority of respondents to the consultation agreed with this recommendation. The Panel were asked to agree the recommendations of the CSD review and the CSD Architecture Principles Document at their meeting on 8 June 2006 (Panel 115/08). The Panel agreed that a single PSL should be created containing non-functional requirements and that the functional requirements from the PSLs should be moved into relevant BSCPs.

1.4 Therefore CP1182 seeks to create a single generic PSL containing participants non-functional requirements.

1.5 The following Party Agents already have a PSL associated with their role. These Party Agents should fall into the scope of the new generic PSL:

- Supplier Volume Allocation Meter Operator Agents (SVA MOAs);
- Non-Half Hourly Data Collectors (NHHDCs);
- Half Hourly Data Collectors (HHDCs);
- Non-Half Hourly Data Aggregators (NHHDAs);
- Half Hourly Data Aggregators (HHDAs);
- Supplier Meter Registration Services (SMRSs);
- Meter Administrators (MAs); and
- Central Volume Allocation Meter Operator Agents (CVA MOAs).

1.6 The BSC Audit Report for the Audit Year 1 April 2005 to 31 March 2006 highlighted that there are no detailed requirements on Licensed Distribution Systems Operators (LDSOs) and Unmetered Supplies Operators (UMSOs) around non-functional requirements such as maintaining audit trails. This was raised as a BSC Audit issue. It is therefore proposed that LDSOs and UMSOs are added to the scope of the generic PSL.

1.7 Whilst there are currently only PSLs for Party Agents, it is valid to introduce Parties into the scope of the generic PSL since the definition of a PSL is 'a document of that title, established or adopted and from time to time modified by the Panel in accordance with the Code, setting out the requirements as to particular services which are to be performed by Parties and Party Agents'.

1.8 This Change Proposal does not seek to include Suppliers in the generic PSL, following ISG and SVG concerns regarding the impact on small Supplier businesses (more detail on this is included in ISG75/02).

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2 Solution

2.1 A generic PSL (PSL100) has been drafted[1]. The following participants should fall in the scope of this generic PSL: SVA MOAs, NHHDCs, HHDCs, NHHDAs, HHDAs, SMRSs, MAs, CVA MOAs, LDSOs, and UMSOs.

2.2 This generic PSL covers all non functional requirements set out in the current PSLs:

- PSL 110 – SVA Meter Operation;
- PSL 120 – Non Half Hourly Data Collection;
- PSL 130 – Half Hourly Data Collection;
- PSL 140 – Non Half Hourly Data Aggregation;
- PSL 150 – Half Hourly Data Aggregation;
- PSL 160 – Supplier Meter Registration Service;
- PSL 170 – Meter Administrator; and
- PSL 180 – CVA Meter Operation.

2.3 The ultimate aim (although this does not form part of this CP) is that all functional requirements in the existing PSLs will be incorporated into a relevant and corresponding BSCP and all the existing PSLs withdrawn. The functional requirements are not to be removed from the existing PSLs as part of this CP, but this will be progressed under subsequent CPs. This means that during the transition from many to one PSL, there may be duplication between the generic PSL and the existing ones.

3 Participant Impact Assessment

3.1 CP1182 v3.0 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 15 responses were received of which, 14 agreed and 1 was neutral.

3.2 The maximum implementation time requested by participants was 90 days.

3.3 All Industry Impact Assessment responses received in response to CP1182 version 3.0 are included in the tables below, with an ELEXON recommendation where required.

3.4 The non-functional requirements contained in the current PSLs do not exactly match up with one another. An attachment was provided to CP1182 v1.0 and v2.0 when they were sent for Impact Assessment and clearly sets out where the non-functional obligations differ between the proposed PSL100 and each of the current PSLs. This attachment was not included when CP1182 v3.0 was sent for Impact Assessment as no significant wording changes were made between v2.0 and v3.0 (the main change was simply to remove Suppliers from PSL100). This document is provided as Attachment B.

3.5 The only change recommended by ELEXON at this stage is the correction of a minor typographical error. While ELEXON notes that there are minor changes between the current PSL100 drafting and the existing PSL wording; we believe that these changes add clarity and therefore should remain.

[1] Version 0.6 (which was sent out as Attachment A in the most recent Impact Assessment) is attached.

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4 Updated Progression Plan for removing the functional requirements from PSLs

4.1 The progression plan for moving the functional requirements in the PSLs into the BSCPs was presented to the SVG in February (SVG73/07). The suggested the timetable is included in the table below.

Extract from SVG 73/07 - High Level Plan for Option 1		
Release	**Remove**	**Main CSDs impacted**
November 2007	PSL170 (Meter Administrator)	BSCP520
February 2008	PSL130 (Half Hourly Data Collection)	BSCP502 and BSCP550
	PSL150 (Half Hourly Data Aggregation)	BSCP503 and BSCP550
	PSL160 (Supplier Meter Registration Service)	BSCP501, BSCP510 and BSCP513
June 2008	PSL120 (Non Half Hourly Data Collection)	BSCP504, BSCP508, BSCP513 and BSCP516
	PSL140 (Non Half Hourly Data Aggregation)	BSCP505 and BSCP513
November 2008	PSL110 (SVA Meter Operation)	BSCP513, BSCP514 and BSCP550
	PSL180 (CVA Meter Operation)	BSCP02, BSCP05, BSCP06 and BSCP20

4.2 The additional Impact Assessment for CP1182 (which resulted from concerns raised by the ISG) has meant that the approval of CP1182 has been delayed by several months. Despite this delay, it is still possible to include CP1182 in the November Release. However, this has also resulted in the deferment of the Impact Assessment for the DCP to remove the functional requirements remaining in PSL170, due to its dependency on CP1182.

4.3 The last DCP batch for the February 2008 Release is the next (July) batch. If CP1182 is endorsed by the ISG and SVG, ELEXON intends to send the DCP to remove PSL170 for Impact Assessment in the July batch (although CP1182 will not have been approved by the Panel) so that it can be targeted for the February 2008 Release.

4.4 Changes to remove the functional requirements remaining in HHDC and HHDA PSLs are also currently targeted for the February Release and ELEXON hopes that DCPs to affect this will also be sent out in the July batch.

4.5 SVG73/07 stated that the SMRA PSL removal may be delayed from the February 2008 Release to the June 2008 Release if necessary, dependent on the Change Assessment workload. Given the current workload, and the deferment of the PSL170 DCP, the SMRA PSL removal will now be targeted at the June 2008 Release.

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5 Recommendation

5.1 ELEXON's recommendation, based upon the responses above, is to endorse CP1182 v3.0 for inclusion in the November 2007 Systems Release.

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IA Summary for CP1182

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1182	Creation of a generic Party Service Line	CPC00604	14 Agree to the Change 0 Disagreed to the Change 1 Neutral to the Change	N/A

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Gemserv Ltd	-	There is no impact from this CP; however, when CPs are raised to remove the service specific PSLs and move certain clauses into the relevant BSCPs there will be an impact on the MRA Product Set. Documents within the MRA Product Set often reference service specific PSLs and sometimes reference sections within the PSL. As and when CPs are raised against individual PSLs changes will be required to: • The MRASCo Model • Definition of 'Nil Advance to Meter Procedure' in the MRA • Working Practice Product Set (including WP6, WP59, WP116, WP119, WP122, WP123, WP131) • MAP08 The changes are all relatively minor in nature; however, the MRASCo Model in particular is a	-	-	There is no impact on the implementation of this CP, however, this will be kept in mind when recommending the Release date for subsequent CPs to remove the existing PSLs.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
		fairly complicated document and drafting the relevant MRA CP to give effect to the BSC CP will, we estimate, take one month in elapsed time to draft. For general guidance, we believe that a lead time of 3 months is required from receipt of formally approval by the relevant Panel Committee to implementation of the changes to the MRA Product Set.			
IMServ Europe	✓	-	X	0	-
Imserv – UKDC	✓	-	X	-	-
Siemens Energy Services	✓	-	✓	90	-
Scottish and Southern Energy plc	✓	-	X	0	-
EDF Energy, Supplier	✓	-	X	-	-
United Utilities	✓	**Agree Change Comment**: Agree as users will only have to refer to one document which should help with finding information required and reduce the time taken to find the information. **Impact Comment**: Staff will need to be made aware of the change so processes will need to be updated. **Implementation Comment**: No impact on systems so November 2007 planned release date is not a problem.	✓	-	-

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Western Power Distribution	✓	-	-	30	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0	-
SAIC Ltd Response provided on behalf of: ScottishPower Energy Management Ltd, ScottishPower Generation Ltd, ScottishPower Energy Retail Ltd and SP Transmission Ltd.	✓	-	X	90	-
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	**Implementation Comment**: Changes to our internal processes will be required	✓	90	-
E.ON UK Energy Services Limited	✓	-	X	-	-
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower	✓	**Agree Change Comment**: As the generic PSL does not make any change to current MOP obligations it is not expected that there will be any impact on existing MOP systems or processes.	X	-	The wording of the non-functional requirements in the PSLs vary, so it is not possible to create a single non-functional PSL without making some wording changes (these will be different for different Agent roles).

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		Whilst it appears that most of the passages from the NHHDC PSL 120 v17.0 are present in the same or virtually similar forms in the generic PSL, there is a concern that some passages have been re-worded or have small additional elements which were not present previously, (see below for examples). The change proposal discusses merging the PSL requirements but does not mention introducing new ones. We ask for confirmation that the requirements in the generic PSL are unchanged from current requirements. This will enable us to support an implementation date of November 2007. Further to this, the change proposal mentions that non functional requirements will not be removed from the exisiting PSLs as part of this process and we question whether this will introduce ambiguity and confusion. **Impact Comment**: It is expected that there will be no impact provided that the generic PSL does not impose any new or amended requirements when compared with current requirements.			When previous versions of CP1182 have been issued for Impact Assessment an attachment (Attachment B to this paper) has been included to clearly show where requirements will be different for each specific role. The attachment showing this breakdown was not included on V3.0, as no changes to the requirements set out in the draft PSL100 were being proposed (from version 2.0). The particular instances highlighted by Npower are discussed in more detail in the comments on the redline text table. ELEXON has discussed and agreed its recommendation for each of the redline comments with Npower. The existing PSLs cannot be fully removed until the functional requirements have been moved into the relevant BSCPs. It is possible to remove the non-functional sections of the PSL as part of CP1182, however, this is not recommended because there are occasions where only part of a paragraph or section would remain, which could cause more confusion than it would resolve. Further redlining would be required if these sections were to be removed as part of this CP (e.g. to correct references in other CSDs). There is also a risk that the MRA documentation would have to change (as described in the comment from Gemserv above). ELEXON is keen to remove the existing PSLs in stages as it will help us to manage our workload, and the costs associated with this

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
					piece of work. This does mean that there will be a transition period between the current arrangements and the new more streamlined arrangements for PSLs.
British Energy Direct Ltd	✓	**Agree Change Comment**: Existing PSLs must not be withdrawn until all related functional requirements are transferred to appropriate BSCPs. **Impact Comment**: A review and update to our processes will be required. **Other Comments**: Costs associated with maintaining a large number of Party Service Level documents should be reduced.	✓	30	-
Power Data Associates	✓	**Agree Change Comment**: The resulting changes to combine PSL170 & BSCP520 is where some issues will arise. Currently the PSL & BSCP have subtly differing text, which will need resolution when PSL170 is 'killed off' **Impact Comment**: Operational procedures, contractual obligations **Implementation Comment**: November 2007 for this change, but indeterminate for the combination of BSCP520 & PSL170	-	-	This will be picked up by the subsequent CP to move the functional requirements in PSL170 'Meter Administration' into BSCP520 'Unmetered Supplies'.

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Comments on Redline text

No.	Organisation	Section	Comments	BSSCo Recommendation
1	Scottish and Southern Energy plc	Typo on page 2	• Data Aggregators (Half Hourly and Non-Half Hourly) (NHHDAs and NHHHAs); *[should be NHHDAs]* • Data Collectors (Half Hourly and Non-Half Hourly) (NHHDCs and NHHHCs); *[should be NHHDCs]*	PSL100 should be updated as suggested.
2	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Backup and Disaster Recovery Paragraph 2.3.2	Under Section 2 in PSL 100 'Service and System', specifically with regards to section 2.3 Backup and Disaster Recovery there is an additional paragraph 2.3.2 that does not as far as I can tell appear in PSL 120. For reference paragraph is: 'Without prejudice to any of the provisions of this PSL, the Market Participant shall take reasonable steps to avoid any disaster which might affect their services. If this is not possible they shall minimise the disruption and impact of the disaster by implementing plans and procedures as described in 2.3.1 for backup and recovery should the need arise to ensure that the Market Participant is able to continue to provide services as set out under the BSC and CSDs.'	Backup and Disaster Recovery requirements are included in all of the PSLs except for PSL160 (SMRA). The current wording (below) was updated based on feedback from ELEXON's Legal team to add clarity (the new wording is also included below). Extract from PSL 120: "The Non Half Hourly Data Collector shall implement these plans and procedures for backup and recovery should the need arise to ensure that the Non Half Hourly Data Collector is able to perform its obligations under this PSL." Extract from PSL100 current draft: "Without prejudice to any of the provisions of this PSL, the Market Participant shall take reasonable steps to avoid any disaster which might affect their services. If this is not possible they shall minimise the disruption and impact of the disaster by implementing plans and procedures as described in 2.3.1 for backup and recovery should the need arise to ensure that the Market Participant is able to continue to provide services as set out under the BSC and CSDs." ELEXON recommends that the current PSL100 drafting is maintained.
3	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower	Section 2.1 System Availability	Under Section 2 in PSL 100 'Service and System', specifically with regards to section 2.1 System Availability as far as I can tell this does not appear in PSL 120.	As shown in Attachment B, this requirement currently appears in PSL110, PSL130, PSL170 and PSL180. The current drafting is: "The Market Participant shall ensure that its systems availability is such that data is capable of being delivered within the timescales specified in the BSC and other CSDs, without detriment to the quality

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No.	Organisation	Section	Comments	BSSCo Recommendation
	Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited			of the data delivered." ELEXON recommends that the current PSL100 drafting is not changed.
4	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Section 3.4 Access Control	Under Section 3 in PSL 100 'Security/Access', specifically with regards to section 3.4 Access Control there are some additional words incorporated into section 3.4.1 and 3.4.1.1 compared to PSL 120 - these have been highlighted in bold below: '3.4.1 The Market Participant will ensure that, controls shall exist to ensure that risk of intentional errors/fraud is minimised. Such controls should include mechanisms which ensure that access to data and documentary evidence is restricted **to the appropriate individuals**. Basic steps that would normally be expected to achieve adequate control in this area include: a security policy communicated to all employees at the Market Participant's organisation and strongly endorsed by management; procedures in place to ensure periodic reviews of security policy; clear data ownership and ownership of all significant information assets including information, software, and physical assets; and compliance with legal, contractual and Qualification requirements. 3.4.1.1 If computer systems are used by the Market Participant, controls should, **in addition**, include: restricting access to computer hardware, **being tangible computer equipment** such as terminals, cables, disk drives,	This wording was updated based on feedback from ELEXON's legal team, comments received in response to the initial (CP1182 v1.0) Impact Assessment, and in transferring the requirements across. "restricting access to computer hardware, **being tangible computer equipment** such as terminals, cables, disk drives, **servers, disks** and magnetic media (e.g. tapes);" In this case additional wording was added to ensure that CDs and DVDs are covered (following a comment in the CP1182 v1.0 Impact Assessment), and to clarify the legal definition of computer hardware. "restricting access to software**, being and computer programs and all user documentation in respect of such programmes,** as well as systems level access, application level access and access to particular programs;" In this case, additional wording was included to clarify the legal definition of computer software. "If computer systems are used by the Market Participant, controls should, **in addition**, include…" "….restricted **to the appropriate individuals**. Basic steps that would normally be expected to achieve adequate control in this area include…" In both of the above cases the wording was updated to add clarity to the requirements. ELEXON recommends that the proposed wording in PSL100 is

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No.	Organisation	Section	Comments	BSSCo Recommendation
			servers, disks and magnetic media (e.g. tapes); restricting access to software**, being and computer programs and all user documentation in respect of such programmes,** as well as systems level access, application level access and access to particular programs; and restricting access to hard copy reports produced by the computer systems.'	not changed.
5	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Section 4.2 Access to Non-Computerised Records	Under Section 4 in PSL 100 'Data Confidentiality', specifically with regards to section 4.2 Access to Non-Computerised Records as far as I can tell this does not appear in PSL 120.	As stated in Attachment B, this requirement appears in PSL110, PSL170 and PSL180. The current wording of the drafting is: "For records which are not computerised access shall be restricted and controlled appropriately by the Market Participant. This includes ensuring that: • data is only made available to those parties legitimately entitled to receive it; • data is kept physically secure; and • data is adequately protected against risk of data loss against fire, water damage and theft." ELEXON recommends that this drafting, as set out in PSL100 is not changed.

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Appendix 2 - Detailed Analysis of CP1189

1 Introduction

1.1 CP1189 'Change to allow SVA Line Loss Factors less than one' was raised by United Utilities on 4 May 2007.

1.2 When a new generator or demand customer enters the market they must be given a Line Loss Factor (LLF) by the host Licensed Distribution System Operator (LDSO) for use in Settlement. This is defined as:

Volumes in Settlement = Metered Data x LLF

1.3 If the generator chooses to be treated under the Supplier Volume Allocation (SVA) rules (as opposed to Central Volume Allocation (CVA)), the LLF must take a value of unity or greater. This is a requirement of BSCP528 'SVA Line Loss Factors for Half Hourly and Non-Half Hourly Metering Systems registered in SMRS'.

1.4 It is understood that this restriction was included in BSCP528 on the assumption that the connection of a generator to the network would always reduce losses on the network, and indeed this is often the case. However, the proposer believes that in a situation where there is a large amount of generation and only a small amount of demand, for example a rural area such as the Lake District, the converse is true; the additional generation actually increases distribution network losses.

1.5 The proposer states that to reflect this, a LLF of less than one would be necessary. However, at present the network operator cannot assign a LLF of less than unity. The proposer believes that this has the effect of distorting the data entering Settlement, because metered data is overstated at the Settlement boundary.

1.6 ELEXON has previously considered the issue of SVA LLFs less than one in SVG paper SVG62/09 and concluded that no changes would be required to central systems to allow LLF values less than one to be used in SVA.

2 Solution

2.1 It is proposed that BSCP528 should be amended to allow SVA LLFs to take any positive value (rather than a value of unity or greater) specified to 3 decimal places, i.e. to allow SVA LLFs of less than one. This would be achieved by changing the wording of BSCP528, section 1.3 'Use of the Procedure', to state that SVA LLFs must be greater than zero rather than greater than unity, and to explain the situation where LLFs of less than one may be appropriate, as described below.

2.2 Excerpt of BSCP528 - section 1.3, Use of the Procedure:

iv SVA LLFs must always be submitted as positive scaling factors to three decimal places with a value ~~of Unity or~~ greater than zero (e.g. +1.005, +0.997 etc). It is envisaged that SVA LLFs less than unity would be applied either:

- to a generation customer, where its introduction onto the system causes an increase in the total electrical losses on the distribution network; or

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- to a demand customer, where its introduction onto the system causes a reduction in the total electrical losses on the distribution network.

In either case, these circumstances could arise in areas of the distribution network where the total quantity of local generation exceeds the local demand.

2.3 Aggregated Supplier Line Loss is calculated by multiplying consumption by (LLF – 1); an LLF value less than one would therefore result in a negative Aggregated Supplier Line Loss Value. The SVA Data Catalogue Volume 2: Data Catalogue Appendix A, 'Aggregated Supplier Line Loss', would therefore need to be amended as follows, to permit negative Aggregated Supplier Line Loss values:

Valid Set: Any within the constraints of the format ~~greater than or equal to zero~~

2.4 The MRA Data Transfer Catalogue (DTC), Annex D, Data Item J0186, would need to be similarly amended to permit negative Aggregated Supplier Line Loss values. It has been brought to the attention of the proposer that this change needs to be raised and in the event of CP1189 being approved ELEXON will liaise with the proposer to ensure this change is taken forward.

2.5 It should be noted that because Line Loss Factor is defined in the SVA Data Catalogue (and the MRA Data Transfer Catalogue) as 'zero or positive number within the constraints of the format', no change is required to this definition.

3 Impact on Service Provider

3.1 Assessment for the original SVG paper (SVG62/09) that initially investigated the possibility of SVA LLFs less than one concluded that no operational changes are required in order for the SVAA system to support the use of LLFs less than one.

3.2 As LLF values less than unity have not previously been used in Settlement it may prove beneficial to carry out end-to-end testing to ensure data is processed correctly by participants and successfully loaded into SVAA for volume allocation. Costs incurred by the SVAA for its aspects of testing would be passed on to ELEXON and the industry.

3.3 ELEXON is currently determining the scope of testing that is justified, through internal consideration and discussion with the SVAA. On the basis of the IA responses, impacted participants include some Suppliers and HHDAs (no LDSOs have identified an impact), and ELEXON considers that only testing of a limited scope may be necessary (i.e. several instances of end-to-end flows rather than 'full-width' tests).

3.4 Costs estimates of testing will be obtained the basis of these considerations.

4 Impact on BSCCo Operations

4.1 Estimated 4 man days effort (£880). This estimate encompasses review of red-lined changes to relevant CSDs, implementation of CP1189 as part of a planned BSC Systems Release, and testing the loading of D0265 files with LLFs less than one into an Access database to validate the contents against the latest MDD.

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5 Participant Impact Assessment

5.1 CP1189 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 14 responses were received, of which 9 agreed with the proposed change, 3 disagreed and 2 were neutral.

5.2 One respondent that disagreed with the CP did so because they believed that the process for approval of LLFs by the SVG may already be deficient due to a lack of necessary knowledge regarding LLF values. The respondent felt that in this context it would be inappropriate to implement the change proposed in CP1189, though the proposer believes that any consideration of the LLF approval process should be separate to consideration of the merits of CP1189.

5.3 The LLF process was discussed at SVG76 and the SVG noted that issues exist around approval of LLFs. Though it is possible to compare proposed LLFs with the previous year's submission, this form of benchmarking against historical LLF values would not be available for LLFs less than 1 if introduced. However, the proposer has suggested that it may be possible to use comparison with the LLFs assigned to CVA registered generators (which may be less than 1) in the area as a form of benchmark.

5.4 The respondent considered the proposer's argument and maintained their stance of disagreement with CP1189. The respondent argued that without greater transparency it would be hard to ascertain whether negative LLFs are applied to the correct sites and if indeed the LLFs are calculated correctly. They stated that dealing with transparency issues would require a Modification Proposal rather than a CP, so the issues of transparency and LLFs less than one should be evaluated concurrently. The respondent proposed that the SVG should reject CP1189 and recommend that both negative LLFs and transparency form the basis of a Standing Issue, though it should be noted that as a change to resolve the perceived transparency issues would require a Modification, the Standing Issue would have to be raised by a BSC Party (i.e. ELEXON would not be able to raise it at the request of the SVG).

5.5 A respondent disagreed with the change as proposed due to a concern that it could result in an under-reporting of generation and an over-reporting of supply in Settlement. This was in the context of the general lack of transparency around the methodology of LLF determination. The respondent stated that transparency of the LLF calculation process would allay these concerns as it could be determined what portion of the losses have been allocated to the point of generation and what has been allocated to the point of supply. Though this respondent has clarified that they do not disagree with the principle of SVA LLFs taking values of less than one, they believe that there are issues around the transparency of the current process for LFF evaluation and approval. The respondent believes these issues are of sufficient significance that no change such as that proposed by CP1189 should be implemented until the issues are resolved.

5.6 Another respondent disagreed with the change because they believe the proposal requires further development to fully determine the associated costs and benefits of implementation of CP1189. The respondent noted attributable Settlement error and the implications for Group Correction as examples of areas in which they believe further investigation and elucidation is needed. The respondent has been informed of the proposer's arguments and example in support of CP1189, though it is acknowledged that this does not include quantified evidence of costs and benefits.

5.7 Some of the respondents that agreed with CP1189 commented that the proposed change would enable LLFs to more accurately reflect line losses. A respondent stated the change would remove a long-standing limitation in the calculation of LLFs and noted that the cost of power lost over a distribution network should be allocated to parties in a way that reflects the extent to which they

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gave rise to the losses; the ability to set LLFs of less than 1 would be consistent with this. However, one respondent that agreed did note that there should be an expectation of adequate explanation from any LDSOs seeking to assign an LLF less than 1 of why this is appropriate.

5.8 The proposer provided a response to the industry IA, which, in summary:

- Reiterated that the change proposed is intended to allow a fairer and more accurate representation of the effect users (both generators and demand customers) have on the electricity network. The proposer argued that this would directly support the Applicable BSC Objectives, particularly Objective c) which concerns competition.
- Stated that competition is being adversely affected by an inability to accurately allocate losses to users. The proposer asserted that LLFs less than 1 are appropriate where introduction of a generator onto the system causes an increase in the total electrical losses on the distribution network, and noted that this is liable to occur in areas of the distribution network where the total quantity of local generation exceeds the local demand.
- Gave as an example of these circumstances the United Utilities 132kV system in Cumbria. There are two large CVA registered generators that have both been given LLFs of less than one due to the increased losses they introduce to the system. These LLFs have been approved on an annual basis, supporting the need for such figures in this area. If however a generator in this area chooses to be connected under the SVA rules, it cannot currently be assigned an LLF less than one, thus the true impact of their connection on line losses cannot be accurately represented. This leads to a situation where CVA and SVA registered generators are treated unequally, which is not a fair and representative system.
- Argued that a distinction should be made between any concerns around the transparency of the SVA LLF calculation process and consideration of the merits and drivers behind CP1189. The proposer believes that if SVG sees fit to address transparency issues, this should be accomplished separately and should not cloud the issues around CP1189.

5.9 Of the 14 responses received, one stated that 180 days would be required to implement the change; three estimated 90 days; one said 60; one said 30; and eight stated no impact/zero days. The respondent that stated a requirement of 180 days has not been able to provide any additional details in support of this estimate. The Proposer has made it known that the connection of a generator to its system which it wishes to assign an LLF of less than one (i.e. which thus precipitated this CP) will take place in November, so it would be beneficial from this perspective if the ability to assign LLFs of less than one was in place by that time. Therefore it is proposed that if approved, the changes proposed by CP1189 should be implemented as part of the November 2007 Release.

5.10 No comments were received regarding the redlined text that was circulated as part of CP1189.

6 Recommendation

6.1 There appear to be two issues to consider with regard to this CP:

- Whether Parties registered in the SVA arrangements should be able to be assigned LLFs less than one (i.e. whether the principle is sound, whether this would increase the accuracy of settlement and whether the benefits would be worth the impacts incurred); and
- Whether concerns around the approval process for SVA LLFs preclude the implementation of any changes.

6.2 On the basis that the majority of IA respondents agree with the change, that several respondents have stated support for the argument that LLFs less than one would increase the accuracy of line losses, and that no firm arguments have been advanced against the principle of SVA LLFs less than one, ELEXON recommends that the ability to assign SVA LLFs less than one should be introduced.

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6.3 Though it is up to the SVG to decide whether it is comfortable introducing a change such as this to the LLF arrangements in the context of discussions regarding the LLF approval process, it should be noted that if CP1189 were to be approved the SVG would still retain control of LLFs and could request to examine whatever evidence they consider necessary before actually approving any LLF values of less than one.

6.4 The alternative suggested by an IA respondent is for the SVG to recommend that negative LLFs and transparency of the LLF process form the basis of an Issue Group, though it is important to note that because a change to resolve perceived transparency issues would require a Modification, a Standing Issue would need to be raised by a BSC Party (i.e. ELEXON would not be able to raise one at the request of the SVG).

6.5 In light of these considerations, ELEXON's recommendation is to approve CP1189 for inclusion in the November 2007 Systems Release.

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IA Summary for CP1189

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1189	Change to allow SVA Line Loss Factors less than one	CPC00604	9 agreed to the change 3 disagreed to the change 2 neutral to the change	Documentation: BSCP528, SVA Data Catalogue Volume 2, MRA Data Transfer Catalogue (DTC change to be progressed separately) Party/Party agent system/process

Impact Assessment Responses

Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Gemserv Ltd	-	-	-	-	
SmartestEnergy Ltd	X	**Disagree change comment**: This Change Proposal is wholly inappropriate and compounds a deficiency in the Balancing and Settlement arrangements; the distribution companies do not declare their methodologies for LLF calculation in any detail and the SVG has no understanding of whether the values are accurate or not. And yet SVG approves LLFs and they have a significant impact on settlement. If LLFs less than one are to be allowed, how are we to know that they are accurate and indeed reflect the beneficial impact of embedded generation which, to some extent, must exist in all cases. SVG needs to audit and control the LLF calculation process otherwise it is not performing its role in approving the LLFs. **Implementation Comment**: SmartestEnergy could cope with this change with immediate effect, but it should not occur until SVG has control of the issue.	X	0	The respondent has been advised of the proposer's arguments and example in support of this CP. The LLF process was discussed at SVG76 (June 07); the SVG noted the issues that exist, including around the approval of LLFs without a clear process to ascertain the methodology behind LLF submissions. Some SVG members noted that they compare proposed LLFs with the previous year's submission as a way of validating them. It was noted that, if introduced, it would not be possible to benchmark LLFs less than 1 in this way. The SVG recognised that there are issues with the LLF process, but no suggestions have been made

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
					regarding how it could be improved.
IMServ Europe	✓	-	✓	90	
Siemens Energy Services	✓	-	✓	90	
E.ON UK plc	✓	**Agree Change Comment:** Removes a restriction to cost reflective calculation of LLFs. **Other comments:** CP1189 seeks to remove a long-standing limitation in the calculation of Line Loss Factors (LLFs). We agree that the cost of power lost over a distribution network should be allocated to parties in a way that reflects the extent to which they gave rise to those losses. The ability to set LLFs of less than 1 is consistent with this and the proposer's red-line text provides a concise solution.	-	-	Comments noted.
Scottish and Southern Energy plc	✓	**Agree Change Comment**: Not implementing this change could lead to inaccuracies in settlement however there would need to be a strong case for allowing SVA Line Loss Factors of less than one so would expect a proper explanation from the DNO as to how and why they came up with the LLF.	X	0	Comments noted. Though the respondent supports the CP they also want greater clarity and transparency in the LLF process.
EDF Energy, Supplier Response	✓	-	X	-	
Western Power Distribution	✓	-	-	30	
SAIC Ltd. **Response provided on behalf of:**	✓	Happy with redline text for BSCP528, section 1.3.	X	0	Comment noted.

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
SP Manweb plc. SP Distribution Ltd.					
E.ON UK Energy Services Limited	✓	**Agree Change Comment**: This would allow for realistic Line loss factors to be developed	X	-	Comment noted.
Stark Software International Limited HHDC	✓	**Impact Comment**: Will need to check and possibly modify Aggregation code to accommodate this.	✓	60	Comment noted.
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	-	**Neutral Comment**: In a test environment the scenario of LLFs less than Unity resulted in the production of negative aggregate line loss values.	-	-	Comment noted. It has been noted ion the CP that LLFs less than one result in negative Aggregated Supplier Line Loss values.
British Energy Direct Ltd	X	**Disagree Change Comment**: Without more transparency of the methodology for determining LLFs (and thereby the effective charge faced by suppliers for distribution losses) we cannot be sure that LLFs are appropriately calculated. LLFs less than 1 associated with generation could be inconsistent with demand at the same location and could lead to double counting of losses. Transparency of the LLF calculation process would allay these concerns as it could be determined what portion of the losses have been allocated to the point of generation and what has been allocated to the point of supply. We are concerned that the proposal as it stands could result in an underreporting of generation and an over- reporting of	✓	90	Discussed the response and example provided by the proposer with the respondent. The respondent clarified that though they do not disagree with the principle of SVA LLFs less than one, they believe that there are issues around the transparency of the current process of evaluating and approving LLFs. The respondent believes these issues are of sufficient significance that they do not believe a change, such as that proposed by this CP, should be implemented until the

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		supply for Settlement. **Impact Comment**: System testing would be required to confirm that LLF values less than one can be automatically loaded and manually amended successfully.			issues are resolved.
SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd**.**	X	**Disagree Change Comment**: Although, we understand that this change is an attempt to improve accuracy we have a number of reservations...please see other comments. **Impact Comment**: SP systems and processes will require changes. **Implementation Comment**: 180 days is an absolute minimum and, pending the results of a more detailed impact assessment, could increase. **Other Comments**: The DTC will need to be changed to account for '+ / - num' in the logical format of the 'Aggregated Supplier Line Loss' field. ScottishPower believes that this change should initially have been available for debate in the form a Draft Change Proposal. As it stands, in ScottishPower's opinion, CP1189 requires further development to fully identify the costs and benefits of implementation e.g. what Settlement error is currently attributable to this defect? What are the implications for Group Correction? Happy with redline text for BSCP528, section 1.3.	✓	180	Further clarification of the need for 180 days to implement has been requested; at this time a response has yet to be received and if necessary a verbal update on this will be provided to the SVG. The CP notes that change will be necessary to the DTC, and the proposer has been advised of this. This change will be progressed separate to this CP. The respondent has been informed of the proposer's arguments and example in support of this CP.

<u>No comments received on Redline text.</u>

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Appendix 3 - Detailed Analysis of CP1190

1 Introduction

1.1 CP1190 'Recommended Changes following an Operational Review of MDD Processes' was raised by ELEXON on 4 May 2007.

1.2 Currently, Market Domain Data (MDD) Change Requests submitted to ELEXON (in accordance with BSCP509 'Market Domain Data') are handled through a resource-intensive and potentially error-prone manual process. This results in unnecessary difficulty and expense for both the Parties raising Change Requests, and for ELEXON. In particular, there were several issues arising from version 116 of the MDD release as described in paper SVG61/004.

1.3 At the SVG meeting on 2 May 2006, the SVG agreed that an operational review of the Market Domain Data Process should be carried out (Paper SVG63/08).

1.4 The approach included feedback from a group of industry experts and also from a discussion session at the SVA Forum held on 18 July 2006.

1.5 The review indicated that a number of changes to BSCP509 are desirable to ensure that the requirements are streamlined, and that all of the forms set out in BSCP509 are efficient and consistent with the information in the MDD database. Suggested changes were discussed by the SVG at its meeting on 31 October 2006 (SVG69/02) and these are highlighted in the proposed solution below.

1.6 All of the recommended changes have been agreed in principle by the SVG at its meeting on 31 October 2006 (paper SVG69/02). At that meeting the SVG also agreed that these changes should be progressed as a Change Proposal.

1.7 The changes will result in a more streamlined, transparent and efficient MDD Process. This will be due to:

- Consistency between Entity forms and the MDD database. By providing all the correct fields, and the updated Change Request and Entity forms, this will provide for less potential for misinterpretation by Market Participants attempting to follow these processes;
- Fast-tracking of housekeeping changes and for new Market Participants wishing to register in MDD, wihich will remove the need for minor and inconsequential changes to be Impact Assessed by Market Participants and the SVG; and
- The removal of unnecessary steps and a decrease in some existing timescales.

2 Solution

2.1 The SVG agreed that a number of changes should be made to BSCP509. In summary the changes agreed by SVG are:

- The F509/01 Change Request form is to be re-designed to improve how the required fields are set out and to ensure that it states clearly that the form must be submitted by Authorised Persons in accordance with BSCP38 (except where the form is being submitted by a non-BSC Party as they are not obligated to be compliant with BSCP38);

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- The BSCP509 MDD Entity forms will be updated and redesigned where necessary (in some cases new forms will be created) to improve consistency between the Forms and MDD database. They will also become an appendix to BSCP509;
- A new process for fast tracking Housekeeping changes and adding New Market Participant IDs and their corresponding roles that have gone through the necessary entry procedures will be added to BSCP509. This will rule out the need for these change requests to be sent out for impact assessment within the industry and subsequent approval by the SVG. Changes to MDD will still go through the full BSCCo and SVAA IA process and will be notified to the SVG and market Participants;
- Housekeeping changes will be made to remove incorrect references; and
- The overall MDD process will be more streamlined by removing certain unnecessary steps of the process and shortening/lengthening timescales where necessary to ensure the process is as efficient as possible.

2.2 The proposed redlined document changes (as issued for Impact Assessment) are included as Attachments D to F.

3 Impact on Service Provider

3.1 The SVAA has indicated that there would be no additional ongoing operational costs arising from the proposed changes as these are document only changes.

4 Impact on BSCCo Operations

4.1 The estimated Implementation cost is 6 Man Days effort (£1,320). This is made up of implementing the changes to BSCP509, BSCP537 and BSCP509 Entity Forms and post-implementation work. Once implemented, ELEXON will need to update the MDD Local Working Instructions to capture the process for the housekeeping changes. Additionally there will need to review of the MDD BSC webpage to capture notification of implementation of the changes as a result of the November release. A new guidance note on the MDD processes will also need to be loaded onto the webpage.

5 Participant Impact Assessment

5.1 CP1190 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 11 responses were received of which, 8 agreed, 0 disagreed and 3 were neutral.

5.2 The overall Industry response is that CP1190 should be progressed.

5.3 One respondent commented that more detail against the term “BSC Party” should be included in the MDD Entities list of BSCP509. This would make it clearer where the MDD Entity actually needs to be submitted by a Distributor and not a Supplier. Whilst these changes might improve the BSCP, these were not part of the changes agreed by the SVG after the Operational review of the MDD process and are therefore not in scope of this CP.

5.4 The same respondent also commented that BSCP509 refers to Standard Settlement Configurations 1 and 2 (SSC1 and SSC2) forms and Unmetered Supplies Operational Information being available on the BSC website. However, the respondent found these were difficult to find and suggested a link to where these can be found. The Unmetered Supplies Operational

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Information can be found on the BSC website[2]. ELEXON understands that the SSC1 and SSC2 forms are not easily accessible on the website and will rectify this separately to this CP.

5.5 The respondent also commented that, given the redesigned MDD Change Request form F509/01 must be submitted by an authorised person, a password section should be added to the form to ensure that the authorisation can be verified. This is a sensible suggestion and so it is recommended that a password is added to the form as shown in Section D of this Appendix. To prevent passwords from being published when the F509/01 form is distributed with the MDD Change Circular, the passwords will be removed before publication.

5.6 The respondent made one final general comment that it would be helpful if there was some facility available to undertake a test run of the data for complex changes through the MDD system prior to formally entering the changes to ensure they are correct. Whilst this may be a desirable facility to have, it is not within scope of this CP. A party could raise a Change Proposal to introduce such a measure if they felt it would be beneficial and this could then be assessed in the CP process.

5.7 There were 21 comments on the redline text that are detailed in the table below. Where possible, these comments have been addressed, and as none of the resulting changes are believed to be material ELEXON recommends that a second IA is not required.

6 Recommendation

6.1 ELEXON's recommendation, based upon the Industry Impact Assessment responses is to approve CP1190 for inclusion in the November 2007 Systems Release.

[2] Unmetered Supplies Operational Information can be found at: http://www.elexon.co.uk/participating/unmeteredSupplies.aspx

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IA Summary for CP1190

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1190	Recommended Changes following an Operational Review of MDD Processes.	CPC00604	8 Agree to the Change 0 Disagreed to the Change 3 Neutral to the Change	BSCP509, BSCP509 Entity Forms, BSCP537, Party internal processes

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Gemserv Ltd	-	-	-	-	N/A
Siemens Energy Services	✓	-	✓	90	N/A
Scottish and Southern Energy plc	✓	-	X	0	N/A
EDF Energy, Supplier Response	✓	-	X	-	N/A
United Utilities	-	-	-	-	N/A
Western Power Distribution	✓	-	-	30	N/A
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0	N/A
SAIC Ltd.	✓	**Agree Change Comment**: See comment	X	90	See response on redline text below.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Response provided on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.		below on redline text			
E.ON UK Energy Services Limited	-	-	-	-	N/A
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	**Agree Change Comment**: Attachment A (BSCP509) provides a list of the MDD Entities and who the originator is for each one. However we think there should be more detail against "BSC Party" as there have been instances where the MDD Entity has actually needed to be submitted by a Distributor and not a Supplier, and this needs to be made clear. Attachment A (BSCP509) also refers to SSC1 and SSC2 forms and Unmetered Supplies Operational Information, stating that these are available on the BSC Website. Having searched the site it appears that these are not easy to find. We suggest that either an indication of the section of the site where these are located is included in the BSCP or that a link to these documents is provided on the BSCPs page in the forms column at the BSCP509 entry. CP1190 suggests that the form will be redesigned to state that the form must be	-	-	Whilst these changes might improve the BSCP, these were not part of the changes agreed by the SVG after the Operational review of the MDD process and are therefore not in scope of this CP. The Unmetered Supplies Operational Information can be found on the BSC website at http://www.elexon.co.uk/participating/unmeteredSupplies.aspx. ELEXON understands that the SSC1 and SSC1 forms are not easily accessible on the website and will correct this issues separately from this CP. It would be sensible for a Password section added to the F509/01 form to ensure an

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
		submitted by an Authorised Person (where this is appropriate). We suggest that if this proposal is agreed that a 'Password' section is added to the form to ensure that the authorisation can be verified. **Other Comments**: We would like to make the general comment that it would also be helpful if there was some facility available (for complex changes) to undertake a "test run "of the data through the Cap Gemini system prior to formally entering changes into the system in order to find out if they are correct or not.			Authorised Person has submitted it. It is recommended that a password is added to the form as in Section D. To prevent passwords from being published when the F509/01 form is distributed with the MDD Change Circular, the passwords will be removed. Whilst a facility to undertake a test run of data may be a desirable facility to have, it is not within scope of this CP. A party could raise a Change Proposal to introduce such a measure if they felt it would be beneficial and this could then be assessed in the CP process.
British Energy Direct Ltd	✓	-	X	0	N/A

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Comments on Redline text

No.	Organisation	Section	Comments	BSSCo Recommendation
1	Gemserv Ltd	BSCP537, 2.1.18, Information required	Should read 'Panel' not PAB. The decision is 'Qualification Approval' not 'decision on addition'.	Recommend that the change is made as suggested as the Panel is consistent with the rest of the document and the term 'Qualification Approval' improves accuracy.
2	Gemserv Ltd	2.1.20	Why is this step specific to the SMRA? What about other Qualified Participants?	It is recommended that SMRA is changed to 'Applicant or Qualified Person' in both the Action and From Columns of 2.1.20. (Note that 2.1.20 is recommended to change to 2.1.19 as per point 4 below. See Section C for changes to the original redline document used for industry consultation)
3	Gemserv Ltd	BSCP509, Section 2	Would suggest adding a footnote to BSCP531 to explain that this BSCP will be removed once the transition period for P197 is complete	It is not recommended that this change is made as part of this CP. This will be corrected as part of the P197 implementation.
4	SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	2.1.18	2.1.18 states 'After the panel decision' however it does not state a timescale i.e immediately after Panel or within x days that the appropriate action should be taken.	It is not recommended that this change is made. This is a process that is dependent on the Qualified Person commencing the MDD Change request process and should not be confined within any timescales. In reviewing this comment it was discovered that the order of 2.1.18 to 2.1.20 would benefit from being rearranged to accurately reflect actual timings. This is shown in Section C. Further the term 'Qualified Applicant' in the Action column should be changed to 'Qualified Person'.
5	SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy	2.1.20	2.1.20 states 'After the panel decision', again similar to comments re 2.1.18 no timescale is applied as to when the action should be carried out.	A Party should be able to commence the MDD change request process after they submit their application of their proposed market role details and Qualification Letter. This will mean that it is possible to 'go live' as soon as possible after the Panel decision and not have

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No.	Organisation	Section	Comments	BSSCo Recommendation
	Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.			to be delayed whilst the processing occurs. It is therefore recommended that the when column of 2.1.20 is changed from 'After Panel decision' to 'At any point after 2.1.2'. See Section C for changes to the original redline document used for industry consultation.
6	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0 Page 1 of 14 Section 1.3 Bullet Point 2	Suggest that the phrase ' the MDD publish is not as agreed' is changed to 'the MDD as published'	It is not recommended that this change is made as part of this CP. 'MDD publish' is a defined term under 1.6 of BSCP509 and making such a change would change the meaning of the sentence.
7	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0 Page 5 of 14 Ref 3.2.1	Suggest footnote 3 is deleted as it merely repeats what the 'When' and 'Action' entries indicate.	This was deleted from the redline text but failed to appear as deleted. It is recommended that footnote 3 is deleted.
8	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited,	Redlined text based on BSCP509 v13.0	The 'To' column states that BSCCo submit the MDD CR to the Panel for approval. Is this a change from the current practice for this to go to the SVG for approval?	It is not recommended that this change is made as part of this CP. The term Panel is consistent throughout the BSCP and other BSCPs. The MDD CR is required to be submitted to the Panel. However, the Panel has used its ability under Section B5 of the BSC

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No.	Organisation	Section	Comments	BSSCo Recommendation
	Npower Direct Limited	Page 7 of 14 Ref 3.3.11		to delegate to the Panel Committee.
9	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0 Page 7 of 14 Ref 3.3.12	'When' column states 'At next Panel meeting' & as mentioned in the point above should this not refer to the Panel Committee, SVG? And similarly in sections 3.3.13, 3.3.14 and 3.6.9	It is not recommended that this change is made as part of this CP. The term Panel is consistent throughout the BSCP and other BSCPs. The Panel has used its ability under Section B5 of the BSC to delegate to the Panel Committee.
10	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0 Page 8 of 14 Ref 3.4.1	'Information required' column makes reference to PAB meeting dates. We suggest that this should be Panel Committee meeting dates.	It is not recommended that this change is made as part of this CP. PAB is a defined term in the BSC and therefore can be used in the context.
11	Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	Redlined text based on BSCP509 v13.0 Page 10 of 14 Ref 3.6.9	'To' column states that it is the Panel who are notified of a housekeeping MDD CR. Should this be the Panel Committee instead?	It is not recommended that this change is made as part of this CP. The term Panel is consistent throughout the BSCP and other BSCPs. The housekeeping MDD CR is required to be submitted to the Panel. However, the Panel has used its ability under Section B5 of the BSC to delegate to the Panel Committee.

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No.	Organisation	Section	Comments	BSSCo Recommendation
12	SVAOSS	Redline text based on BSCP509 Entity Forms Page 17 (MDD Entity Id 20 - GSP Group Profile Class Default EAC)	The illustrated table and example are inconsistent, as the GSP Group Profile Class Default EAC entity is missing from one of these	The table is missing the column "GSP Group Name" and not the "GSP Group Profile Class Default EAC" column. This is also missing in the description. It is recommended that this should be corrected. The recommended changes are shown in Section A.
13	SVA Agent	Redlined text based on BSCP509 v13.0 Page 5. 3.2 Changes to SVAA Calendar.	The use of 'BSCCo' and SVAA in the 'FROM' and 'TO' columns is inconsistent. Some occurrences use a full stop and others don't. Suggest standardising the use of BSCCo throughout the document.	It is recommended that this change is made. Full stops to be added.
14	SVA Agent	Redlined text based on BSCP509 v13.0 Page 9. 3.6.1	'Submit MDD Housekeeping CR' suggests that there is a separate CR for housekeeping and could lead to confusion. Suggest 'Submit MDD CR which has been selected as a housekeeping change'.	It is recommended that this change should be made as suggested for clarity.

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No.	Organisation	Section	Comments	BSSCo Recommendation
		Action.		
15	SVA Agent	Redlined text based on BSCP509 v13.0 Page 9. 3.6.1 Information Required.	Suggest removing the word 'document' as it does not appear necessary. Alternatively reword to 'F509/01 form and relevant MDD Entity forms.	It is recommended that this change should be made as suggested for clarity.
16	SVA Agent	Redlined text based on BSCP509 v13.0 Page 9. 3.6.1 Information Required.	The words 'Appendix 4.1 details the changes that can be raised and the originators that can raise them' could be misleading as it implies that 4.1 will detail the changes that can be raised as housekeeping changes. Suggest removal, re-wording or specifically listing all the Entity Forms which can be raised as housekeeping changes (maybe as an additional column to 4.1).	It is recommended that the words 'Appendix 4.1 details the changes that can be raised and the originators that can raise them' are removed from the information Required column of 3.6.1 for clarity.
17	SVA Agent	Redlined text based on BSCP509 v13.0 Page 10. 3.6.10 Action.	The word 'registtration' is spelt incorrectly.	It is recommended that registration is spelt correctly.
18	SVA Agent	BSCP509 Entity	MDD Entity 20 is not in line with the rest of the table of contents.	It is recommended that 'MDD Entity 20' in the contents of BSCP509 Entity Forms is corrected to be

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No.	Organisation	Section	Comments	BSSCo Recommendation
		Forms Page 3. Table of Contents.		in line with the rest of the table contents.
19	SVA Agent	BSCP509 Entity Forms Page 3. Table of Contents.	MDD Entity 62 appears to have additional spacing in between the number and title name.	It is recommended that the additional spacing between the number and name of MDD Entity 62 is removed from the contents of BSCP509 Entity Forms.
20	SVA Agent	BSCP509 Entity Forms Page 10. MDD Entity 12.	The form is missing a column for 'Alternative Average Fraction of Yearly Consumption'.	It is recommended that the 'Alternative Average Fraction of Yearly Consumption' column is added as suggested. Additionally, the data description and example column should be added. This can be seen in Section B.
21	SVA Agent	BSCP509 Entity Forms Page 23. MDD Entity 26.	The columns 'Start Month' and 'Start Day' should be swapped so they match the MDD input screens.	It is recommended that the 'Start Month' and 'Start Day' columns are swapped as this would be a sensible change to ensure these match the MDD input screens.
22	SVA Agent	BSCP509 Entity Forms Page 52. MDD Entity 54 & Page 54. MDD	The columns labelled 'Effective From Settlement Date of MTC within Distribution Services area' and 'Effective To Settlement Date of MTC within Distribution Services area' should match the new titles used in Entity 53, 'MTC for Distributor Effective From Settlement Date' and 'MTC for Distributor Effective To Settlement Date'.	It is recommended that the change is made as suggested. As these columns are referring to the same data fields, these columns in MDD Entity 54 and 55 should be updated.

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No.	Organisation	Section	Comments	BSSCo Recommendation
		Entity 55.		

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A - Updated Redline version of MD Entity 20

MDD Entity Id 20 - GSP Group Profile Class Default EAC

GSP Group Id	GSP Group Name	Profile Class Id	GSP Group Profile Class Default EAC	Effective From Settlement Date {GGPCDE}	Effective To Settlement Date {GGPCDE}

Column Name	Data Type/Length	Other information
GSP Group Id	2 Characters	Mandatory
GSP Group Name	Up to 30 Characters	Mandatory
Profile Class Id	Integer (2)	Mandatory
GSP Group Profile Class Default EAC	Numeric (12,1)	Mandatory, zero or positive value
Effective From Settlement Date {GGPCDE}	Date	Mandatory
Effective To Settlement Date {GGPCDE}	Date	Optional

1.1

1.2 Example

GSP Group Id	GSP Group Name	Profile Class Id	GSP Group Profile Class Default EAC	Effective From Settlement Date {GGPCDE}	Effective To Settlement Date {GGPCDE}
_A	Eastern	1	3592.4	01/04/1996	
_G	North Western	8	185491.7	01/04/1996	

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B - Redline version of MD Entity 12

MDD Entity Id 12 - Average Fraction of Yearly Consumption

GSP Group Id	Profile Class Id	Standard Settlement Configuration Id	Effective From Settlement Date {VSCPC}	Effective From Settlement Date {AFOYCS}	Time Pattern Regime Id	Average Fraction of Yearly Consumption	Alternative Average Fraction of Yearly Consumption

Column Name	Data Type/Length	Other information
GSP Group Id	2 Characters	Mandatory
Profile Class Id	Integer (2)	Mandatory
Standard Settlement Configuration Id	4 Characters	Mandatory
Effective From Settlement Date {VSCPC}	Date	Mandatory
Effective From Settlement Date {AFOYCS}	Date	Mandatory
Time Pattern Regime Id	5 Characters	Mandatory
Average Fraction of Yearly Consumption	Numeric, 6 Decimal Places	Mandatory, must be a positive value between 0 and 1 inclusive
Alternative Average Fraction of Yearly Consumption	Numeric, 6 Decimal Places	Optional

Example

GSP Group Id	Profile Class Id	Standard Settlement Configuration Id	Effective From Settlement Date {VSCPC}	Effective From Settlement Date {AFOYCS}	Time Pattern Regime Id	Average Fraction of Yearly Consumption	Alternative Average Fraction of Yearly Consumption
_G	2	0937	26/04/2002	26/04/2002	14150	0.608000	
_G	2	0937	26/04/2002	26/04/2002	14151	0.392000	

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C - Updated Redline changes to Section 2.1

REF	WHEN	ACTION	FROM	TO	INFORMATION REQUIRED	METHOD
~~2.1.18~~	~~After Panel decision~~	~~Raise MDD circular to add Qualified Applicant information to MDD database in accordance with BSCP509.~~	~~BSCCo~~	~~SVAA~~	~~Panel decision on Qualification Approval.~~	~~As per BSCP509.~~
2.1.~~18~~189	5WD after 2.1.17	Notification of Panel's decision to accept Qualification.	BSCCo	Applicant All interested parties	Panel Decision.	Written Confirmation
2.1.19~~20~~	At any point ~~A~~after ~~Panel decision~~2.1.2	~~SMRA~~Applicant or Qualified Person may commence with MDD change request process.	~~SMRA~~Applicant / Qualified Person	BSCCo	MDD change request form F509/01 in accordance with BSCP509.	Email / Fax.
2.1.20	After Panel decision	Raise MDD circular to add Qualified Person information to MDD database in accordance with BSCP509.	BSCCo	SVAA	Panel decision on Qualification Approval.	As per BSCP509.
2.1.~~19~~21	Next PAB meeting after 2.1.17	Notify PAB of Panel's Decision and detail additional matters that are required to be addressed, including where a technical assurance check is required (if appropriate).	BSCCo	PAB	Panel Decision.	Meeting
2.1.2~~0~~	Within 5 WD of 2.1.17 (if Qualification deferred)	Applicant informed in writing of the rationale for the decision. BSCCo to provide guidance, assistance and clarification to the Applicant as to why its Application was deferred. Proceed to 2.1.6.	BSCCo	Applicant	Areas of the SAD that are not acceptable and/or other areas which require further testing or evidence to be provided as determined by the Panel.	Written Confirmation

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D - Updated Redline MDD Change Request Form

4.2 MDD Forms

MDD Change Request Form -

MDD CR Number
(For BSCCo use)

Part A - Completed by Originator and submitted to BSCCo

~~MDD Entity~~Market Participant Id (MPID).....MDD Entity Forms attached.....

Details of proposed change ~~(reference any attachments / including medium if appropriate)~~ .....

.....

Reason for Change.....

Originator's Name ..... Company .....

Party ID..... Password.....

Date.....(Authorised in accordance with BSCP38 ~~and/or BDTP38~~except Non-BSC Parties)

Part B - Completed by BSCCo and submitted to SVA~~A~~ Agent

I confirm that appropriate authorisation has now approved the above MDD Change Request.

Please implement the change, ensuring publication no later than (calendar date): .....

with a Go Live Date of .....

Part C - Completed by SVA Agent and returned to the BSCCo

I confirm that above MDD Change Request has been implemented.

SVAA Name ..... ~~SVAA Signature~~ Date.....

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Appendix 4 - Detailed Analysis of CP1191

1 Introduction

1.1 CP1191 'Amendment of SVAA Service Line SSL330 to bring it in line with current contract arrangements' was raised by ELEXON on 4 May 2007.

1.2 Recent changes to the Supplier Volume Allocation Agent (SVAA) contract arrangements have created a misalignment between the contract arrangements and the SVAA Service Line SSL330. Therefore SSL330 needs to be updated to ensure that there is no potential for the SVAA to misinterpret their obligations and that there is not conflicting requirements on the SVAA.

1.3 CP1191 contains the necessary amendments to SSL330 to bring it in line with the existing contract arrangements.

2 Solution

2.1 It is proposed that the SVAA Service Line SSL330 is updated.

2.2 The amendments to SSL330 include reflecting that the:

- Ad Hoc Reporting Service will no longer be in use;
- SVAA Agreement has been replaced with the SVAO (Supplier Volume Allocation Operations) Agreement;
- Initial Settlement and Reconciliation Agent (ISRA) System has been replaced by ISRA Software; and
- Software Acceptance testing has been replaced by User Acceptance Testing.

2.3 The proposed redlined document changes are included as attachment 1.

3 Impact on BSCCo Operations

3.1 The Estimated Implementation cost is 0.5 man days effort (£110) to make the necessary changes to SSL330. There are no Service Provider costs to align SSL330 with the Service Provider contract.

4 Participant Impact Assessment

4.1 CP1191 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. Nine responses were received of which, six agreed, none disagreed and three were neutral.

4.2 The overall industry response is that CP1191 should be progressed.

4.3 One respondent who agreed with CP1191 queried whether it was more appropriate to amend the contract following changes to the Service Line rather than in reverse as is the case with CP1191. The argument of the respondent was that the contractual arrangements should accommodate the Code and its subsidiary and supporting documents rather than the governance arrangements accommodating contracts. ELEXON notes that the normal process would be for a Contract and a Service Line to be updated simultaneously.

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4.4 Another respondent who agreed with CP1191 queried that with the removal of the ad hoc reporting service from SSL330, how will ad hoc reporting be required. ELEXON notes that the reason that ad hoc reporting has been removed is because it is no longer part of the operational service for which this contract applies. Ad hoc reporting, if required, is carried out under the contract for application maintenance and support.

5 Recommendation

5.1 ELEXON's recommendation, based upon the Industry Impact Assessment responses is to approve CP1191 to be implemented on 23 August 2007 (P197 Implementation Date)[3].

[3] This is the earliest opportunity to implement this change. It is desirable that there is no mismatch between the SVAA contract agreement and the descriptions in their SSL's. By implementing this change at the earliest opportunity the risk of misinterpretation or challenge of obligations is reduced. SSL330 is also being amended for P197, so this document is already included in this release.

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IA Summary for CP1191

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1191	Amendment of SVAA Service Line SSL330 to bring it in line with current contract arrangements	CPC00604	6 Agree to the Change 0 Disagreed to the Change 3 Neutral to the Change	SSL330, Party internal processes

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Gemserv Ltd	-	-	-	-	
Siemens Energy Services	-	-	X	-	
Scottish and Southern Energy plc	✓	-	X	0	
EDF Energy, Supplier Response	✓	-	X	-	
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0	
SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy	✓	-	X	90	The requirement for 90 days was queried and SAIC confirmed that only 10 days is required for internal documentation changes.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.					
E.ON UK Energy Services Limited	-	-	-	-	
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	**Agree Change Comment**: Whilst we agree that this may be the most effective and timely solution we query whether it is not more appropriate to amend the contract following changes to the Service Line rather than the other way around. Shouldn't contractual arrangements accommodate the Code and it's subsidiary and supporting documents rather than the governance arrangements accommodating contracts?	-	-	The normal process would be for the contracts and Service Lines to be updated in parallel such that the contract reflects the Service line. In this instance the contract was updated first.
British Energy Direct Ltd	✓	**Agree Change Comment**: With removal of the ad hoc reporting service from SSL330, how will ad hoc reporting now be acquired? **Impact Comment**: A review and update to our processes will be required	✓	30	The ad hoc reporting service has been removed because it is no longer part of the operational service for which this contract applies. Ad hoc reporting is carried out under the contract for application maintenance and support.

Comments on Redline text

There were no comments on the redline text.

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Appendix 5 – Detailed analysis of CP1193

1 Introduction

1.1 CP1193 'Recommended changes following an Operational Review of BSCP38 (Authorisations)' was raised by the ELEXON on 4 May 2007.

1.2 BSCCo noted concerns raised by the Central Registration Agent (CRA) and BSC Parties undertaking the Authorisations process. The following areas were of particular concern:

- the current process whereby Parties submit two Authorisation forms to the CRA and BSCCo is bureaucratic and confusing;
- the burden of maintaining two Authorisation Registers managed by the CRA and BSCCo;
- increased effort for both the CRA and BSCCo in managing the Annual Review process;
- a lack of clarity with regards to validation methods; and
- a lack of clarity with respect to the rules for delegation of Authority from Directors to Category A Authorised Persons.

1.3 BSCP38 has been in operation for five years, and apart from a few alterations over time in response to specific issues, has not been the subject of an Operational Review. As a result of this, the Imbalance Settlement Group (ISG) agreed that an Operational Review would be beneficial. ISG Paper 66/03 set out the objectives of the review as:

- to identify changes which can be made to improve the efficiency, transparency and effectiveness of the Authorisations Process;
- to specify the new requirements for the BSCP38 Authorisations Process; and
- to draft and recommend changes to give effect to any potential improvements identified.

1.4 ISG Paper 68/03 provided a summary of the Operational Review findings, and documented the recommended changes to Code Subsidiary Documents. The proposed recommendations were also sent out for industry consultation as directed by the ISG. As a result of the consultation it was recommended that the Authorisation Registers held by the CRA and BSCCo should be merged into one Authorisation Register and managed by the CRA. It was also recommended that authorised signatures be removed from the validation process, and that the formal timescales associated with the current Annual Process in BSCP38 be removed.

1.5 This CP seeks to streamline the current BSCP38 processes where they are unnecessarily burdensome on participants. A single Authorisation Register will also reduce confusion experienced by Parties when submitting forms to two separate Authorisation Registers which in turn should reduce the number of BSCP forms that are rejected on the basis of the submitting person being authorised on the wrong Authorisation Register. This CP also suggests a number of other changes to BSCP38 recommended as part of the Operational Review, to provide clarity.

2 Solution

2.1 As a result of the Operational Review, it is proposed that the two Authorisation Registers are merged into one Authorisation Register and managed by the CRA. The formal timescales associated with the current Annual Confirmation Process in BSCP38 would be removed. There would also be changes made to BSCP38 to clarify Category A Authorised Persons' ability to delegate authority still further without referring back to the Company Director. The CP would also remove the formality around changes to email addresses by permitting Category A Authorised Person to make changes to email addresses.

2.2 Merging the Authorisation Registers held by the CRA and BSCCo into a single Authorisation Register would improve the efficiency and effectiveness of the Authorisation process, and make it less onerous for Parties. In BSCP38, this would be achieved by amalgamating BSCP38 forms 5.1 and 5.3 into one form which would be sent directly to the CRA.

2.3 The CRA would be required to provide details of each Authorised signatory including their Party, role, Authorisation categories, and passwords to BSCCo to allow them to carry out their BSC activities. The CRA would also be required to provide BSCCo with updates of the Authorisation Register. This would mean that the existing CRA-I013 report will be sent to BSCCo in addition to its current recipients in order to update BSCCo on changes to the Authorisation Register.

2.4 The requirement to carry out the Annual Confirmation Process with Parties and Party Agents will continue. However, the current requirement for Parties to formally respond within 5 working days to notify BSCCo of any changes to Authorised Persons will be removed from BSCP38. Instead timescales would be stipulated in written communication with Parties when the review is initiated. This would give Parties adequate notice and time to review and validate their records.

2.5 Amongst the changes to BSCP38 would be the clarification that Company Directors would be able to delegate their Authorisation by nominating someone as a Category A Authorised Person, with this person then being able to delegate this authorisation further without reference back to the Company Director.

2.6 ELEXON proposes that BSCP38 make clear that should an Authorised Person's email address change, notification should be provided by their Category A person. This would be provided from the Category A person's authorised email address account and would contain the Category A authorised person's name and password in order to authenticate and validate the change and the old and new email addresses of the person who's name is changing, along with their authorisation category(ies).

2.7 References to BDTP38 should be removed from BSCP38 Section 1.6, as it is not an Associated BSC Procedure.

3 Impact on Service Provider

3.1 The Authorisation Registers owned by the CRA and ELEXON would be merged into a single Authorisation Register. This single Authorisation Register would be managed by the CRA, and the amalgamated Declaration of Authorised Person's form would be sent directly to the CRA.

3.2 The CRA would be required to provide BSC Party Details (Action Code, BSC Party Name and BSC Party ID), Party Role Details (Action Code, Party Type, Registration Effective From/To Date), Role Address Details (Action Code, Address, Telephone Number, Fax Number, Email Address), Authorised Signatories (Action Code, Name, Password, Contact Phone Number, Email Address)

and Authorisation Categories (Action Code, Activity, Effective From/To Date) to BSCCo to allow them to carry out their BSC activities, i.e. to validate any forms submitted by an Authorised Person. The CRA would also be required to provide BSCCo with updates of the Authorisation Register via the CRA-I013 report. The CRA would also be responsible for carrying out the Annual Confirmation Process with Parties and Party Agents.

3.3 The CRA will need to ensure that the single Authorisation Register contains all the current Authorisation Category data that is held on both the CRA and BSCCo databases. This would require the CRA to load a spreadsheet from BSCCo in order to load the Authorisation Category data that is currently held by BSCCo.

3.4 An obsolete Authorisation Category (Category E) currently exists on the CRA database. This was used for 'Raise / Agree Standing Data Changes', but was discontinued. More recently, this Authorisation Category was re-used on the BSCCo database as 'Submitting SVA Entry Process Requests'. In order to ensure that the existing obsolete Category E data in CRA cannot be confused with the new Category E data that BSCCo will be migrating across, the CRA need to run a script to update the existing data in the CRA database from Category 'E' to a dummy code ('EA'), and then end-date it.

3.5 The CRA database will have to be updated as per the changes to the IDD documents that were consulted on to reflect the new allowable values (Authorisation Categories) in respect of authorisations. The redlined changes to the IDD part 2 would need to be applied in order to reflect the new sending of the CRA-I013 to BSCCo as per the redlined changes attahced to the CP. The CRA User Requirement Specification (URS) would also need to be altered in order to show the new sending of the CRA-I013 to BSCCo (CRA-F002 and CRA-I013).

4 Impact on BSCCo Operations

4.1 BSCCo currently manage one of the two Authorisation Registers. Once this Change Proposal is implemented, the CRA will be responsible for managing a single Authorisation Register. BSCCo will provide Authorisation Category data to the CRA (which would consist of the Authorised Categories that BSCCo have in their database that are not present in the CRA database), but once this change is implemented, the CRA will hold the master data, and therefore will have the sole responsibility of updating the Authorisation Register.

4.2 Estimated BSCCo Implementation costs are 32 Man Days (£7,040), which consists of changes to Local Working instructions; applying the redlined changes to BSCP38; Data cleansing to ensure that all information on the Authorised Person's spreadsheet is up-to-date before it is sent to the CRA to load in Central Systems; the set up of automated flows to receive weekly CRA-I013 flows, and the necessary testing to convert the I013 files to a formatted spreadsheet; changes to the various Guidance Notes to capture the fact that all forms are now submitted to the CRA. It should be noted that the estimated Service Provider costs are £11,621, which will be for applying the redlined changes to the IDD and the associated changes to the software, testing, and project management.

5 Participant Impact Assessment

5.1 CP1193 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which, 9 agreed, 0 disagreed and 3 were neutral.

5.2 The overall response to CP1193 is that the change should be progressed, as it would improve administration for Parties and the CRA. The advent of a single Authorisation Register would reduce duplication in the internal processes for Parties, and make the Authorisations process more straightforward. There was a concern as to how the two Authorisation Registers would be merged, in particular how BSCCo would transfer data to the CRA, and it was explained that BSCCo would export a file from the BSCCo data repository to the CRA. This will be an up-to-date file containing a full set of Participant IDs, Authorisation Names and all process codes associated with the Authorisation Names. Therefore participants will not have to re-complete any form to transfer this data from the BSCCo to the CRA.

5.3 The longest lead time requested by respondents to CP1193 was 90 Days. Some respondents stated that they would need to make changes to their internal processes. The Proposed Implementation Date of November 2007 can be met with this implementation timescale.

6 Recommendation

6.1 ELEXON's recommendation, based upon the Industry Impact Assessment responses, is to approve CP1193 for inclusion in the November 2007 Systems Release.

IA Summary for CP1193

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1193	Title	CPC00604	9 Agree to the Change 0 Disagreed to the Change 3 Neutral to the Change	BSCP38, Party internal processes

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Gemserv Ltd	-	-	-	-	N/A
Siemens Energy Services	-	-	X	-	N/A
Scottish and Southern Energy plc	✓	**Agree Change Comment**: This will improve the administration for both ourselves and CRA/BSCCo	X	0	N/A
EDF Energy	✓	-	X	-	N/A
United Utilities	-	-	-	-	N/A
Western Power Distribution	✓	-	-	30	N/A
E.ON UK plc	✓	-	X	0	N/A
SAIC Ltd	✓	**Implementation Comment**: This would be the minimum time required to allow the updating of internal processes and documentation.	✓	5	N/A
EDF Energy Networks	✓	**Agree Change Comment**: We support this	✓	90	Have tried to contact the respondent to gather more information on the nature of the changes

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		CP as we feel a single register of Authorised Persons will reduce duplication in our internal processes. **Implementation Comment**: Changes will be required to our internal processes.			that would be made to their internal processes since the lead time required is longer than other respondent. Waiting for a response. A verbal update will be provided to the ISG if a response is received before the meeting. The Proposed Implementation Date of November 2007 can be met with this implementation timescale
E.ON UK Energy Services Limited	✓	**Impact Comment:** Limited impact on LWPs	✓	-	N/A
Npower	✓	**Agree Change Comment**: We support this proposal as it will make the authorisations process more straightforward.	-	-	N/A
British Energy	✓	**Agree Change Comment**: Submission of one form to CRA should streamline the current BSCP38 processes. **Impact Comment**: A review and update to our processes will be required. Please see comments below on implementation issues. **Other Comments**: How will the changeover be managed? Will BSCCo transfer all records to CRA, or will all parties be required to complete new Form 5.1 and return to CRA within x-weeks of BSCP38 release date?	✓	30	Contacted the respondent regarding their comment, details below. Explained that BSCCo would export a file from the BSCCo data repository to the CRA. Explained to the respondent that this will be an up-to-date file, which will contain a full set of Participant IDs, Authorisation Names and all process codes associated with the Authorisation Names. Therefore participants will not have to re-complete any form to transfer this data from the BSCCo to the CRA All data held by BSCCo will be transferred to

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		We support the integration of the two Authorisation Registers with CRA responsible for its upkeep. We have some minor concerns with the integration process; theoretically, different Category A authorised persons could exist on the different existing registers, or the same person may have different passwords with each registry. Hence some care will be need in the consolidation process. Perhaps a Category A person from the BSCCo register should authorise the details to be transferred in a similar manner to the annual review process. We have further comments on the use of Category A authorisations. This category is described as being for Changing Authorisations, although there are a few other specified uses, e.g. submission for inclusion in the list of Validated Suppliers. It appears that Category A is also being accepted as an alternative for every other category, which we do not consider to be a valid use. Category A should be limited to its specified purpose only; Parties should be expected to consider carefully which are the appropriate categories for each individual and appoint accordingly. Despite the apparent current interpretation of Category A by Elexon and other parties, we have always ensured that category A authorised persons wishing to undertake relevant activities themselves under other authorisation categories are appropriately authorised for those activities.			the CRA Therefore, if an organisation had different category A persons with BSCCo and the CRA, both would exist on the combined register (It is acceptable for an organisation to have two Category A authorised persons). If there was one person with two passwords, then this would be highlighted during the Data Cleansing process and BSCCo will contact the Category A Authorised Person to confirm which the preferred password is. Category A has always been used as a category for nominating other authorised signatures, or as a category that can be used as a replacement for any other authorised categories. There is no proposal to change this as part of this CP.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		We expect the Elexon 'Online Forms' project to take into consideration this CP as part of its work. We are surprised that the estimated number of man days required for this CP is 34 and would expect it to be less.			The 'Online Forms' project is taking this CP into account. The estimated implementation cost is 34 days as the following activities need to be carried out: changes to Local Working instructions; applying the redlined changes to BSCP38; Data cleansing to ensure that all information on the Authorised Person's spreadsheet is up-to-date before it is sent to the CRA to load in Central Systems; the set up of automated flows to receive weekly CRA-I013 flows, and the necessary testing to convert the I013 files to a formatted spreadsheet; changes to the various Guidance Notes to capture the fact that all forms are now submitted to the CRA.

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Comments on Redline text

No.	Organisation	Section	Comments	BSCCo Recommendation
1	SAIC Ltd	Interface Specification Pt 1 (attachment B)	Error in footer.	BSCCo recommend that this error is deleted and "copyright" and "footer classification" fields are entered manually.
2	SAIC Ltd	Interface Specification Pt 2 (attachment C)	Error in footer.	BSCCo recommend that this error is deleted and "copyright" and "footer classification" fields are entered manually.
3	Npower Ltd	Interface Specification Pt 2 (attachment C) 3.1.3	Missing space between "Issue" and "Authentication"	BSCCo recommend that no change is made, as this entry is consistent with how it occurs elsewhere in the text.
4	Npower Ltd	**BSCP38_v0.4** p1, 1st paragraph	Replace 'or' with a comma - ... CVA MOAs ~~**or**~~ **,** Licensed Distribution System Operators and BSCCo.	Recommend that this change should be made
5	Npower Ltd	p1, 2nd paragraph	We would suggest the wording of this paragraph is amended to state that confirmation of Authorised Persons needs to be undertaken annually rather than by the anniversary of the commencement of authorisation. This would reflect current practice as Elexon recently sent notification of this requirement via Newscast, issue 135. The current wording implies that the list needs to be reviewed more than once a year.	Recommend that the paragraph is reworded to read: "Parties, ECVNAs, MVRNAs, CVA MOAs and LDSOs are required to confirm lists of Authorised Persons at the request of the CRA on an annual basis."

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No.	Organisation	Section	Comments	BSCCo Recommendation
6	Npower Ltd	p1, final paragraph under 1.2	Reference is made to BSCP533 'PARMS Data Provision'. For consistency, we believe the Authorisations for these activities are also included within BSCP38.	BSCCo recommend that the Authorisations for these activities are outside the scope of this CP.
7	Npower Ltd	p1, 1.3 'Authentication Guidance'	Are there no BSCP forms to be submitted to the BSCCo, for example, BSCP25 / 5.1	Recommendation that "BSCCo" is reinserted.
8	Npower Ltd	P2 1.4 (b)	Should the timescales be agreed between the CRA and Recipient, and not agreed by the CRA alone as the wording suggests?	BSCCo recommend that the wording is not altered, as the timescales should be set by the CRA in order to avoid any inconsistency in the Authorisation Process amongst Parties (although there is scope for discussion with individual participants if stated timescales are deemed unachievable).
9	Npower Ltd	p3	1.6 Associated BSC Procedures. Does BSCP537 'Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs' need to be added to the list as this has a go-live date of 23rd August 2007.	BSCCo recommends that no changes are required since this change will be made as part of the P197 Release (on 23 August 2007).
10	Npower Ltd	p5	Footnote 4 – is this footnote now redundant as the CRA will naturally be notified of a cancellation of authorisation, whether it is due to personnel leaving an organisation or changing role within an organisation. If it is felt that it is necessary to give a reason for the cancellation then we suggest that this is added to the relevant form.	Recommendation that this footnote is deleted, as it does not add anything or provide any more clarity.
11	Npower Ltd	p5	A new footnote, no. 6, is referenced under 3.1.2 but the footnote is located on the following page.	The location of footnotes is down to word as opposed to the user, so this may or may not be possible, depending on how much space there is on the

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No.	Organisation	Section	Comments	BSCCo Recommendation
			Should this be moved to page 5?	relevant page when the redlining is applied to the full document.
12	Npower Ltd	p6	Ref 3.2.1 'When' is stated as 'As Requested'. Recommend this is changed to 'Annually'.	It will be an annual event, but needs to be initiated by a request from the CRA (as described in 1.1). Therefore recommend that no changes are made.
13	Npower Ltd	p7	Footnote 7 'Notification may be via Email ...' is rather vague and therefore seems pointless.	Recommendation that this footnote should be removed.
14	Npower Ltd	p7	Category A – under BSCP column – is stated as N/A. Should this be replaced with BSCP38?	This Category is the Category used to set up other Authorised Persons and so is not for any particular BSCP and as a Category A Authorised Person can sign-off on any other Category (which would suggest that all BSCPs in the table could be added, which may be unmanageable). Therefore recommend that no changes are made.
15	Npower Ltd	P7	Category E – under BSCP column – shouldBSCP511 and BSCP512 be replaced with BSCP537 (due to P197)?	BSCCo recommends that no changes are required since this change will be made as part of the P197 Release (on 23 August 2007).
16	Npower Ltd	p9	Category S – under Description column – suggest a footnote is added to clarify that the form must be submitted via fax or post.	Recommend that no footnote should be added, but recommend that "Withdrawal Notice must not be via Email." Should be changed to "Withdrawal Notice must be submitted by fax or post."
17	Npower Ltd	p9	Category U – under BSCP column – replace BSCP531 with BSCP537 (due to P197)	BSCCo recommends that no changes are required since this change will be made as part of the P197 Release (on 23 August 2007).

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No.	Organisation	Section	Comments	BSCCo Recommendation
18	Npower Ltd	P10	Category Y – under Description column – the description of Originator could be expanded to actually state what action is required, as detailed for all the other categories.	Recommend that the following text is added onto the text in the Description column: "...to submit MDD Change Requests"
19	Npower Ltd	p13	Confirmation that wording for 'K' is correct as 'or Volume Notification Nullification Requests' is missing compared to present BSCP38.	This is how it has always been phrased on the "Declaration of Authorised Persons form". It is a short hand phrase of the one in the Authorisation table (Section 4). Therefore recommend that no changes are made.
20	Npower Ltd	p14	Confirmation that wording for 'W' is correct as 'Accept or Reject automatic Standing Data Changes' is missing compared to present BSCP38.	This is how it has always been phrased on the "Declaration of Authorised Persons form". It is a short hand phrase of the one in the Authorisation table (Section 4). Therefore recommend that no changes are made.
21	Npower Ltd	p14	The process for 'Z' is completely re-worded?	This is how it has always been phrased on the "Declaration of Authorised Persons form". It is a short hand phrase of the one in the Authorisation table (Section 4). Therefore recommend that no changes are made.
		Interface Specification **Part 1_DCR**		
22	Npower Ltd	p2	'C' – activity is different to current BSCP38 which states 'Site Witnessing of Meter Readings'	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.

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No.	Organisation	Section	Comments	BSCCo Recommendation
23	Npower Ltd	p2	'D'- activity is different to current BSCP38 which states 'On-Site Meter Readings'.	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
24	Npower Ltd		'EA' – it is not clear from the redlining what this actually means?	An obsolete Authorisation Category (Category E) currently exists on the CRA database. This was used for 'Raise / Agree Standing Data Changes', but was discontinued. More recently, this authorisation category was re-used on the BSCCo database as 'Submitting SVA Entry Process Requests'. In order to ensure that the existing obsolete category E data in CRA can't be confused with the new category E data that BSCCo will be migrating across, the CRA need to run a script to update the existing data in the CRA database from category 'E' to a dummy code ('EA'), and then end-date it.
25	Npower Ltd	p2	'G' – activity is different to current BSCP38 which includes 'Deregistration'.	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
26	Npower Ltd	p2	'K' – activity is different to current BSCP38 which includes 'or Volume Notification Nullification Requests'	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
27	Npower Ltd	p2	'M' - activity is different to current BSCP38 which states 'Amendments to Non Confidential Report Requirements'	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore

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No.	Organisation	Section	Comments	BSCCo Recommendation
				recommend that no changes are made.
28	Npower Ltd	p2	'N' – activity is different to current BSCP38 which includes 'Provision of Credit Cover'	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
29	Npower Ltd	p3	'W' - Confirmation that wording for 'W' is correct as 'Accept or Reject automatic Standing Data Changes' is missing compared to present BSCP38	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
30	Npower Ltd	p3	'Z' - '... access' has replaced 'Administration' from current BSCP38?	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
31	Npower Ltd		'ZA' – activity is different to current BSCP38?	This is just shorthand to fit onto the document of an authorisation category that is already maintained by the CRA (i.e. not added by this CP). Therefore recommend that no changes are made.
		Interface Specification Part 2_DCR		
32	Npower Ltd	p3 4.2	ITT reference: should CP1193 be added?	This is an internal ELEXON reference as this redlining was created before the CP was numbered. The CP reference number will be included in the final version.

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Appendix 6 – Detailed analysis of CP1194

1 Introduction

1.1 CP1194 'Publication of Authorised Person's data on the BSC website' was raised by ELEXON on 4 May 2007. BSCP38 (Authorisations), defines the processes under which Authorised Persons are registered and how these records are amended. The procedure is to ensure that the BSC Agents and BSCCo carry out specific Code activities only at the request of an Authorised Person.

1.2 ELEXON noted a concern raised by the SVG and BSC Parties that it was often very difficult for Parties to perform required Code activities in a timely manner when they were not aware of who within their organisations was authorised to do.

1.3 This Change Proposal seeks to grant BSC Parties easy access to their companies' list of Authorised Persons, enabling them to carry out obligated activities under the Code more efficiently. The changes suggested in this Change Proposal will allow BSCCo to publish the details of those Authorised Persons as requested. This would result in BSC Parties being better equipped to send correctly-authorised BSCP forms to BSCCo and BSC Agents in a timely fashion.

1.4 Having the information available to Parties on the website will also simplify Parties' internal processes and make it easier for them to manage their authorised signatories efficiently.

2 Solution

2.1 If Party and Party Agents wish to publish their Authorised Persons list on the BSC website, they must first give formal authorisation to BSCCo expressing their consent that BSCCo can disclose such personal data regarding them and their employees to third parties (this would be in the form of a name of the Authorised Person, Party/ Party Agent ID and the authorisation level and would not include telephone numbers and email addresses). A Category A authorised signatory would give this consent on behalf of all their company's authorised signatories.

2.2 This CP proposes a new section 1.7 'Publication of Authorised Person's data on BSC Website' on BSCP38, that will contain:

- the fact that Party and Party Agents must provide formal authorisation to BSCCo confirming consent to disclosing their personal data to third parties;
- instructions that formal authorisation must be submitted by a Category A Authorised Person to BSCCo (in writing), clearly stating the relevant Party/Party Agent ID(s) to which the Authorised Person(s) relate to; and
- confirmation that upon receipt of such authorisation, the Party/Party Agent ID(s), Party name, Authorised Person's Name and the relevant Authorisation Category will be published on the BSC website.

2.3 It should be noted that the CP stated that this section would be numbered 1.8, however since there is currently no section 1.7 of BSCP38, it will be inserted as section 1.7.

3 Impact on BSCCo Operations

3.1 Once this CP is implemented, BSCCo will notify Parties and Party Agents that this service is available, and that formal written authorisation is required in order to publish an Authorised Person's data on the BSC website.

3.2 Implementing this CP will impact BSCCo as they will be responsible for creating a new section on the BSC website to publish the Authorised Persons data, and asking relevant Parties and Party Agents if they consent to having their details published on the BSC website.

3.3 BSCCo will receive the Party/Party Agent ID, Party Name, Authorised Person's name and relevant Authorisation Category from the Trading Operations Monitoring and Analysis System (TOMAS), which will be automatically uploaded onto the BSC website. This system will upload the information for Party/Party Agents that have submitted written consent to their data being published on the BSC website. BSCCo will make quarterly checks on the BSC website to ensure that the Authorised Persons' data is correct and up-to-date.

3.4 The cost for this change will be £5,280 (24 Man Days), which will consist of the design of a new section of the BSC website to hold the Authorised Persons data and the associated information and testing of the new functionality. It also included revision of the Local Working Instructions (LWIs) and the development of the automated system that will be required to load the data from the CRA-I013 files onto the BSC website.

4 Participant Impact Assessment

4.1 CP1194 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which, 7 agreed, 2 disagreed (although one of these respondents subsequently changed their disagreement to neutral) and 3 were neutral. The respondents that disagreed with the change changed their response to 'neutral' once BSCCo made it clear that telephone numbers and email addresses would not be published on the BSC website.

4.2 The overall response to CP1194 was that it should be implemented. Certain respondents felt that this information should only published for a company to locate the relevant authorised person within their own organisation, and so security measures (such as a more defined log in) should be introduced. Once BSCCo explained that telephone numbers and email addresses would not be published on the BSC website, one of these respondents changed their disapproval of the change to a 'neutral'. There were also concerns as to whether formal written consent from a Category A Authorised Person was the same as obtaining a release from each Authorised Person. BSCCo explained that submission from a Category A Authorised Person is a release of the relevant personal data for all Authorised Persons within that organisation, and therefore BSCCo would not need to follow up the submission by the Category A Authorised Person by obtaining a release from each person on that organisation's Authorised Signatory list.

4.3 One respondent disagreed with the change on the basis that money is being spent centrally as a result of Parties not having efficient internal processes, and felt that if it is paid for centrally, contact information such as telephone numbers and email addresses should also be included so that the information is more useful to other BSC Parties. BSCCo explained that this CP was raised in response to Parties not being able to find certain Authorised Persons within their own organisation and not other organisations, and so personal contact information would not be included.

4.4 The longest lead time requested by respondents to CP1194 was 90 days. Some respondents stated that they would need to make the minor changes to their business process. The Proposed Implementation Date of November 2007 can be met with this implementation timescale.

5 Recommendation

5.1 ELEXON's recommendation, based upon the Industry Impact Assessment responses, is to approve CP1194 for inclusion in the November 2007 Systems Release, as it believes that the publication of authorised person's data on the BSC website will aid clarity.

IA Summary for CP1194

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1194	Publication of Authorised Person's Data on the BSC website	CPC00604	7 Agree to the Change 2 Disagreed to the Change 3 Neutral to the Change	BSCP38; Party internal processes; and the BSC website

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Gemserv Ltd	-	-	-	-	N/A
Siemens energy Services	-	-	X	-	N/A
Scottish and Southern Energy plc	✓	-	X	0	N/A
EDF Energy, Supplier Response	✓	-	X	-	N/A
United Utilities	-	-	-	-	N/A
Western Power Distribution	✓	-	-	30	N/A
E.ON UK plc	✓	-	X	0	N/A
SAIC Ltd	X	**Disagree Change Comment**: In principle, ScottishPower has no objection to the publication of Authorised Person's data on the BSC website, provided that ELEXON has first	X	0	Explained that Party/ Party Agent must give formal authorisation to BSCCo expressing their consent that BSCCo can disclose such personal data regarding it and its employees to third

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		received the specific written permission of the persons involved. However, ScottishPower does not believe that this information should be publicly available, but should be restricted to employees of the relevant Party. Therefore, it is ScottishPower's view that where such lists are published on the BSC website, access to these must be password controlled, perhaps utilising my ELEXON, to enable such restriction. This may already be the intention of ELEXON; however that is not reflected in the text of the Change Proposal. ScottishPower believes that it should be made clear to participants what security measures will be put in place.			parties. 5.2 Explained that the information provided would be would be in the form of a name of the Authorised Person, Party/ Party Agent ID and the authorisation level, and that sensitive information such as telephone numbers and email addresses would not be included. Explained that in the absence of sensitive information such as telephone numbers and email addresses, security measures would not be necessary and that all Party/ Party Agents will be able to access this data on the BSC website. Once the respondent was clear that telephone numbers and email addresses would not be published on the BSC website, they said that they no longer objected to the CP and were 'neutral' to the change.
EDF Energy Networks	✓	**Implementation Comment**: Minor change to our business process.	✓	90	Have tried to contact respondent to discover what the nature of the minor changes to their business process would be since the lead time required is longer than other respondents. Waiting for a response. A verbal update will be

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
					provided to the ISG if a response is received before the meeting. The Proposed Implementation Date of November 2007 can be met with this implementation timescale.
E.ON UK Energy Services Limited	✓	-	X	-	N/A
Npower	✓	**Agree Change Comment**: We support the on-line publication of authorised person's data as it aids clarity. We believe that only details of your own party should be available which could be achieved with a more defined log-on. Finally, it is unclear whether the proposed solution which states that submission in writing by a Category A Authorised Person is the same as obtaining a release from each Authorised Person for publication of the information relating to them. Does the proposal mean that the submission from the Category A person will be considered as a release for each Authorised Person within that organisation? Or does it mean that the agreement to have an on-line list for an organisation will be obtained from a Category A person initially and then BSCCo will follow this up by obtaining a release from each person on that organisation's Authorised Signatory list.	-	-	Explained that there would not be a more defined log on to access Authorised Person's data on the website. Explained that a submission in writing by a Category A Authorised Person is the release from each Authorised Person for publication of the information relating to them. Explained that as the submission from the Category A Authorised Person is the release for each Authorised Person within the organisation, and so BSCCo would not need to follow up the on-list by obtaining a release from each person on that organisation's Authorised Signatory list. The respondent stated that they were in favour of the change going ahead as defined in the CP with details of Authorised Persons being available to all participants.
British Energy	X	**Disagree Change Comment**: Justification based on a desire to replace inadequate	X	0	Explained to the respondent that this CP was created in response to concerns raised by the

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		internal communications by parties is quite unacceptable. The authorisation process gives assurance to all parties that operational processes are being operated by properly authorised persons. It provides protection against unauthorised persons either disrupting the settlement process or potentially creating disputable events, and also assists parties in managing their internal authorisation process. However, we do not believe that assistance to parties should replace the normal business responsibility of parties to manage their own internal authorisation process. **Other Comments**: The proposed publication of the list of authorised persons is for the benefit of the Party to which the persons belong and not all Parties in general. BSCCo's website is not intended to be a substitute for poor management by Individual Parties. We would be happy to support publication of Authorised Persons (subject to responsible Party approval) provided there would be some benefit to all Parties, for example if at least one form of contact detail was provided. This would facilitate the COBO process, setting up of new ECVNA Authorisations, etc. However, as contact details are not to be included we believe this CP is not making good use of responsible Parties money.			Supplier Volume Allocation Group (SVG) and BSC Parties that it was often very difficult for them to perform required Code activities in a timely manner when they were not aware of who within their organisations was authorised to do. Explained that this was a CP that would help a Company to locate their own Authorised Persons, and that telephone numbers and email addresses would not be published. The respondent felt that if other Parties could not contact these Authorised Person's at other companies then the data published should be limited to each company. The respondent felt that individual Parties should have the wherewithal to list their own Party/Party Agent ID(s), Party name, Authorised Persons Name and the relevant Authorisation Category. The respondent felt that all parties are to some degree financially responsible for the BSC website, and as such should be able to benefit from any service on the website. The respondent reiterated their opposition to the change.

No Comments on Redline text provided

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Appendix 7 - Detailed analysis of CP1195

1 Introduction

1.1 CP1195 'Amendments to BSCP27 (Technical Assurance of Half Hourly Metering Systems for Settlement Purposes) and BSCP38 (Authorisations) with regard to Category I Authorised Signatories' was raised by the ELEXON on 4 May 2007.

1.2 There is a requirement for the Central Volume Allocation (CVA) Registrant's Authorised Category I (Technical Assurance Site Visit Acceptance) Signatory to sign the notification form to the Technical Assurance Agent (TAA) and Meter Operating Agent (MOA) confirming acceptance of an impending inspection site visit (BSCP27/3.5.3). There is no step within BSCP38 for the Central Registration Agent (CRA) or ELEXON to provide the relevant authorisation information to the TAA and so the TAA is unaware of whom the Authorised Signatories are. The TAA therefore do not currently check that the acceptance of an inspection visit form had been signed by a Category I signatory. The proposed change is to still require the form to be submitted, but to remove the requirement for it to be signed by an authorised signatory, thus reflecting current practice. There is no risk to Settlement of the form not being signed by the Authorised Signatory as a representative of the MOA will always accompany the TAA on site.

1.3 As there is no risk to Settlement, the proposal is to remove Category I from BSCP38 (as it is used solely for notification of TAA site visits); and references to an Authorised Signatory from BSCP27. The removal of references to an Authorised Signatory from BSCP27 would not remove the obligation for the CVA Registrant to send an email confirming acceptance of the site visit to the TAA and MOA.

1.4 It should be noted that if this CP is not agreed by the ISG and SVG, a separate CP may have to be raised to add an obligation into BSCP38 for the CRA to provide the TAA with a list of Category I signatories on a regular basis.

2 Solution

2.1 It is proposed that Category I will be removed from BSCP38/5.3. However, if the changes arising from CP1193 (Recommended changes following an Operational Review of BSCP38-Authorisations) are approved, then this change will need to be made to the revised BSCP38/5.1 form. BSCP27 will have the references to authorised signatories for the CVA Registrant to sign the acceptance of an inspection visit form, which currently exist in BSCP27/3.5.3, removed.

3 Impact on Service Provider

3.1 The TAA will still receive confirmation of acceptance of its impending site visit, but the CVA Registrant will no longer need to be an Authorised Signatory. This will not prejudice the right of CVA Registrants, or any other participant, of providing the TAA and BSCCo with preferred contacts or requesting details from the TAA and BSCCo on contacts held.

4 Participant Impact Assessment

4.1 CP1195 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 12 responses were received of which, 6 agreed, 2 disagreed (one of these respondents subsequently stated they agreed to the change) and 4 were neutral.

4.2 A respondent felt that this change would lead to a reduction in the level of 'red tape' around the process for Registrants contacting the TAA to confirm acceptance of the impending site visit. Another respondent had concerns over how the Registrant would be informed of the impending site visit, but it was explained that the only change would be that the notification form would not be signed by a Category I Authorised Signatory. The CVA Registrant would still have to provide acceptance of the impending site visit, which would be by email in accordance with the current process. The TAA will contact the Registrant through the Technical Assurance Agent Management Tool (TAAMT) which is an on-line database used for the managing of TAA audits and recording the results. One respondent was concerned as to how the process would ensure that the TAA had up-to-date contact details for the Registrant. BSCCo informed the respondent that participants would be contacted on an annual basis to ensure that the TAA and BSCCo hold the correct details. A respondent was concerned that BSCP27 would have to be changed to place the obligation of the TAA site visit on the MOA. BSCCo explained that the responsibility to confirm acceptance of the site visit still lay with the Registrant. One of the respondents who was initially against the change stated that based on the BSCCo response to their queries, they were amenable to the change.

4.3 The longest lead time requested by respondents to CP1195 was 90 days, with changes anticipated to internal processes. The Proposed Implementation Date of November 2007 can be met with this implementation timescale.

5 Recommendation

5.1 ELEXON's recommendation, based upon the Industry Impact Assessment responses, is to approve CP1195 for inclusion in the November 2007 Systems Release, as it believes that the removal of Category I from BSCP38 and references to Authorised Signatories from BSCP27, brings the procedures in line with actual practice.

IA Summary for CP1195

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
CP1195	Amendments to BSCP27 (Technical Assurance of Half Hourly Metering Systems for Settlement Purposes) and BSCP38 (Authorisations) with regard to Category I Authorised Signatories	CPC00604	6 Agree to the Change 2 Disagreed to the Change 4 Neutral to the Change	BSCP27, BSCP38, Party internal processes

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Gemserv Ltd	-	-	-	-	N/A
IMServ Europe	✓	-	X	0	N/A
Siemens Energy Services	-	-	X	-	N/A
Scottish and Southern Energy plc	✓	-	X	0	N/A
EDF Energy, Supplier Response	✓	-	X	-	N/A
United Utilities	-	**Neutral Comment**: This does appear to be a removal of a level of 'red tape' where the registrant contacts the TAA for CVA audits. There should be no impact on MOAs as MOAs are not normally the registrant and is taking away an obligation rather than providing an	-	-	N/A

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		additional one.			
Western Power Distribution	✓	-	-	30	N/A
E.ON UK plc	-	-	-	-	N/A
SAIC Ltd	✓	-	X	90	N/A
E.ON UK Energy Services Limited	✓	-	X	-	N/A
Npower	X	**Disagree Change Comment**: Our main concern with this proposal is that it is the Registrant and not the MOA who is responsible for the metering system. If this category of Authorisation is removed, how will the TAA obtain details of the Registrant to send the visit request? It does not seem that adequate steps are taken to ensure that the Registrant is informed of an impending visit. For instance on page 11 of BSCP27 it states that the Registrant is the Party responsible for providing access to the metering equipment and a revisit (for non-attendance) may be initiated at the expense of the Registrant if access cannot be gained or the MOA fails to attend the visit. How will the process ensure that the TAA has up to date contact details for the Registrant (and MOA)? Will BSCP27 be changed to place the obligation of the visit on to the MOA as the proposal seems to suggest? It is the Registrant who is	-	-	Explained that BSCCo and the previous TAA have developed contacts over the years with Registrants, and so they would contact them in the same way that they do currently. BSCCo has passed these details onto the new service provider. The TAA will contact the Registrant through the TAAMT and by other means as required. Explained that BSCCo contact participants on an annual basis to ensure that contact details are up to date. In addition, there is some responsibility that lies with the Registrant and Party Agent to ensure that the TAA and BSCCo hold the correct contact details (i.e. if contact details change or someone leaves, the expectation would be for the relevant Registrant/ Party Agent to advise BSCCo of any developments. Explained that there would be no change in BSCP27, and the Registrant is still responsible, and that this CP only brings the BSCP in line

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		ultimately responsible, not the MOA, so this should not be.			with actual practice and the process for accepting SVA inspections. Following these explanations, the respondent stated that they agreed with the change.
British Energy	X	**Disagree Change Comment**: Although the proposed removal of authorised confirmation for TAA inspection visits would not represent a direct settlement risk, it could lead to wasted visits which the existing process is intended to avoid. A preferable solution would be for CRA to provide TAA with a list of Category I Authorised Signatories. **Impact Comment**: Minimal impact on internal processes. **Other Comments**: We not are not totally comfortable with the proposal to remove Category I, particularly under the CVA arrangements where the registrant is often the site owner and direct contact with the site owner is therefore possible. (Contrast this with SVA where the registrant is rarely the site owner). It appears that the TAA are not being provided with the list of appropriately authorised persons despite the fact that BSCP38 states that the CRA maintains the register on behalf of TAA, amongst others. If the CRA is required to provide a list of authorised persons to other Agents, then why not the TAA as well?	✓	30	Explained to respondent that the TAA does not currently check to see if the CVA Registrant contact is authorised, as they do not have access to this information. As a consequence of this, the number of "No Access" occurrences is not expected to increase under this CP as the CP reflects the current practice. BSCCo explained to the respondent that that the principle reason for "No Access" occurrences was when qualified MOA representatives were unable to attend the TAA site inspection visit as opposed to the CVA Registrant. Therefore this CP is not expected to exacerbate this problem. The respondent felt that this removal could have wider ramifications as anyone within the specified company who has the company domain could send email acceptance of the site visit. Explained that the TAA Management Tool (TAAMT) uses email addresses for User Names, and that this prevents anyone other than people from the registrant's organisation from accessing confidential information. In addition, Registrants can advise the TAA of their preferred contacts list for their organisation

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		Recent experience has shown that the former TAA did not have up to date CVA MSID details - either obsolete (some 20 months earlier) or a change of Registrant. Surely, TAA require a refresh of MSIDs before any sampling process is undertaken which could also include Category I personnel. Our main concern is that registrants are provided with the opportunity to at least postpone an inspection if it were not appropriate for it to proceed on the due date, a practice which we understand will continue. However, how will TAA know who the Party wishes to perform this task? Perhaps the new TAA website should not permit users to register unless they are appropriately authorised under BSCP 38, except possibly for a read-only role. What security checks are employed by TAA in allowing users to register on their website?			and role. If any Registrant or Party Agent has concerns over who from their organisation has registered on TAAMT, they can contact the TAA, who will provide the details. The respondent stated that they still opposed the change and acknowledged that whilst the TAAMT would solve the problem, felt Category I would prevent the problem of 'incorrect' contacts sending email acceptance in the first place.

No Comments on Redline text provided

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Appendix 8 - Detailed analysis of CP1196

1 Introduction

1.1 CP1196 'Changes to incorporate Central Management Systems in Unmetered Supplies arrangements' was raised by ELEXON on 4 May 2007.

1.2 Various manufacturers have developed new technologies which allow equipment categorised as Unmetered Supplies (UMS) in the BSC arrangements to be controlled in a more dynamic way. These technologies, known as Central Management Systems (CMS), provide customers with greater control over the operation of the supply, allowing both the equipment's switching times and power loads to be controlled down to each half hour period. This level of control offers the potential for customers to make significant energy savings, helping to meet increasingly tight regulations on energy consumption and carbon emissions.

1.3 In order for customers to realise the cost benefits of CMS, the detailed usage information of the supply must be entered accurately in Settlement. Half Hourly UMS consumption is calculated using an Equivalent Meter (EM), which is a collection of hardware and software developed and approved for the purpose in accordance with BSCP520. Currently the UMS arrangements recognise two forms of EM:

- passive meters, which allocate unmetered consumption across half hourly periods based on a combination of annual burning hours and daily times of sunrise and sunset; and
- dynamic meters, which allocate unmetered consumption across half hourly periods by reference to a set of photoelectric cells, which provide the details on the switching times of the supply.

1.4 Both passive meters and dynamic meters make use of data registered centrally with ELEXON and made available for use on the BSC Website in the Unmetered Supplies Operational Information Document (Operational Information). In contrast, a CMS-based supply would make use of switching time and power load information provided directly by the management system, with this data being used to calculate the Half Hourly consumption values for submission into Settlement. This represents a new kind of EM, with different data input and operational requirements.

1.5 This CP was developed on the basis of work carried out by a CMS Review Group made up of external experts, established by the Supplier Volume allocation Group (SVG). The detailed discussions and recommendations of the group are detailed in paper SVG72/01 (and attachments).

2 Solution

2.1 It is proposed that changes be made to BSCP520 'Unmetered Supplies', PSL170 'Meter Administration' and the SVA Data Catalogue to formally recognise the incorporation of CMS data into the UMS arrangements. There are a number of aspects to the solution; detailed proposals are included in Attachments P, Q and R to CP1196 but are summarised below.

2.2 **Equivalent Meter Specification:** BSCP520, section 4.5, consists of an EM Specification, which sets out the hardware and software requirements for the current forms of EM, i.e. passive and dynamic. This section would be expanded to include the requirements for a CMS-based EM, and

would be sufficiently generic to cover a variety of CMS solutions developed by different manufacturers. The requirements established by this specification would include:

- CMS data storage;
- provision of data to the Meter Administrator (MA) and Unmetered Supplies Operator (UMSO);
- data validation and exception handling by the Meter Administrator;
- application of default data by the Meter Administrator; and
- provision of data to the Half Hourly Data Collector (HHDC).

2.3 Provision would be made for any further details regarding data population and working practices to be placed in the Operational Information Document where necessary.

2.4 **Testing and Approval Requirements:** All new EMs are currently required by BSCP520 to be approved by the Panel or its delegated authority, the SVG. As part of this process, the initial stages of which are managed by the Unmetered Supply User Group (UMSUG), EMs are tested against the requirements of EM Specification in BSCP520 to ensure they are fit for purpose. The UMSUG then makes a recommendation to the SVG as to whether the EM should be approved for use.

2.5 As the testing of a CMS-based EM is likely to be more frequent and wider in scope than for current passive and dynamic EMs, it is proposed that a new testing and approval process be introduced. Under this approach, an applicant (usually the CMS manufacturer but potentially a customer, Meter Administrator or Supplier) would commission the necessary testing from an accredited test agent, who would evaluate the hardware and software against the EM Specification. The results of this testing would then be presented to the UMSUG and SVG as part of the request for EM approval. Once approved, the details of the new EM would be added to an Approved EM List maintained by ELEXON.

2.6 This approach could also be used for any future approval of new passive or dynamic meters.

2.7 **Meter Administrator Qualification:** New MAs are required to undergo Certification and Accreditation in accordance with BSCP531 (to be replaced by BSCP537 from 23 August 2007) before operating in the market. Furthermore, if an existing Meter Administrator chooses to make use of a new or different EM, the changes required to the participant's systems and processes may trigger a requirement for re-Certification/re-Qualification. These requirements would continue to apply in the case of CMS-based EMs, but with the process making reference to the obligations set out in the new CMS EM Specification. It is therefore proposed that no changes are made to the Certification/Qualification processes.

2.8 **Meter Administrator responsibilities:** The Meter Administrator remains responsible for the data output of the EM, regardless of whether the CMS is being operated by the customer. As a result, most of the current requirements set out in BSCP520 and PSL170 in relation to general Meter Administrator activities would still stand. The main additional requirement for an MA would be to provide the UMSO with an extract of the data received from the CMS, as described in new step 1.4.1.18 of PSL170 (see Attachment B). This information, which would be provided on an ad-hoc basis as required, is needed by the UMSO for audit and planning purposes and would not be available through any other route.

2.9 **UMSO responsibilities:** The current UMSO responsibilities would remain, however some minor changes are required to reflect the UMS arrangements going forward. BSCP520 states that the UMSO nominates the type of EM to be used in a Distributor's area, before then agreeing the location of any necessary PECU arrays with the Supplier. In practice, it is the Supplier who would

be suggesting the use of a new type of EM, and so it is proposed that the role of the UMSO should therefore be to agree with the Supplier, rather than nominate, the type of EM to be used.

3 Impact on BSCCo Operations

3.1 Estimated 4 Man Days ELEXON effort (£880) identified to make the necessary documentation changes.

4 Participant Impact Assessment

4.1 CP1196 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 17 responses were received, of which 11 agreed the change, 2 disagreed (though following discussion one of these respondents agreed the change) and 4 were neutral.

4.2 Of the respondents, 13 were able to meet the proposed November 2007 implementation; 2 stated that 90 days were required for implementation and 11 stated zero days/no impact. However, 3 respondents stated that they required 180 days and could therefore not meet the proposed date – these respondents suggested implementation in February 2008; in addition, one respondent, though agreeing the change should be made, commented that an implementation date of February 2009 would be more appropriate in order to allow sufficient time to resolve all the issue around the incorporation of CMS into the UMS arrangements.

4.3 One respondent felt strongly that November implementation should be retained, arguing that this would be a pragmatic course that would allow and encourage development of CMS to proceed as quickly as possible. This respondent accepted that it may not be possible for all of the necessary system changes to be completed for November, but believed that workarounds could be used to good effect in the short term.

4.4 Though ELEXON is satisfied that a governance framework and all necessary document changes could be implemented as proposed by November 2007, it is acknowledged that numerous UMSOs would require more time before they could be in a position to fully accommodate CMS based EMs if requested to do so. Therefore a revised implementation date of February 2008 is proposed, as a compromise between the demand to enable CMS systems to be used in the UMS arrangements and the time needed by numerous UMSOs to implement the necessary system changes.

4.5 A respondent disagreed with the CP because they believe that the proposal does not go far enough in utilising the capabilities of CMS. The respondent stated improvement of the loading information used in UMS should be the focus of CMS work, and suggested that CMS should be used to effectively meter some UMS apparatus, providing accurate loading data. They commented that though this approach is problematic due to the criteria for certification as a meter, they believe this difficulty can be overcome, and that furthermore CMS would not need to be certified as meters if the UMS apparatus they were used to monitor was treated as an exempt supply; CMS would then not require certification under Schedule 7 of the Electricity Act 1989.

4.6 It should be noted that even if a customer operates a CMS, an accredited MA must be responsible for the data output of the EM. A customer wishing to operate a CMS and take responsibility for the data output of the EM, and thus obviate the need for a separate MA, would need to qualify as an MA itself.

4.7 The use of CMS will not relax the requirements of the UMS arrangements – requirements such as connection agreements between lighting authorities and LDSOs would remain, while increased load research to determine correlation between dimming and power load would be necessary.

4.8 A number of comments were received on the redlined text issued for industry IA; these are included in the table below along with BSCCo's recommendation for each. None of these suggested changes are felt to be material, and so if any are approved the CP would not need to be issued again for industry IA.

4.9 It should be noted that due to ongoing work to remove the current PSLs (replacing them with a single non-functional PSL and moving functional requirements to the appropriate BCSPs) the changes proposed to PSL170 are unlikely to be published now that CP1196 is targeted at February 2008 implementation. This is because a CP moving functional requirements in PSL170 to BSCP520 is also anticipated to be implemented in February 2008. However, the subsequent movement of any material added to PSL170 by approval of CP1196, from PSL170 to BSCP520, would be presented to industry for assessment and to the relevant Panel Committee for approval as part of the change process.

5 Recommendation

5.1 ELEXON's recommendation, based upon the previous analysis and recommendations of the UMS expert group, and upon the responses received to the CP1196 Industry Impact Assessment, is to approve CP1196 for inclusion in the February 2008 Systems Release.

IA Summary for CP1196

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1196	Changes to incorporate Central Management Systems in Unmetered Supplies arrangements	CPC00604	11 agreed to the change 2 disagreed to the change 4 neutral to the change	Documentation: BSCP520 'Unmetered Supplies registered in SMRS', PSL170 for Meter Administrator, SVA Data Catalogue Volume 2. Party/Party Agent systems/processes: United Utilities (UMSO/MOP), Siemens Energy Services, Western Power Distribution, EDF Energy Networks plc, Central Networks, Power Data Associates.

Impact Assessment Responses

Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Gemserv Ltd	-	-	-	-	
United Utilities (UMSO)	✓	**Agree Change Comment**: But only on the conditions detailed below. **Impact Comment**: Not known **Other Comments**: One of the main motivations for introducing a Central Management System CMS is to enable the Lighting Authorities to make significant energy savings over the current system. CMS would allow the Lighting Authorities to meet increasingly tight restrictions on energy budgets and reduce carbon emissions related to street lighting. Ultimately the introduction of CMS will reduce the overall energy bill for the lighting authority. Lighting Authorities already make large savings to their energy bill by not declaring equipment or inaccurately declaring equipment. For example it is already known that recently adopted section 38	✓	-	Comments noted. See BSCCo comments below.

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		sites, may not be declared on an inventory for many years if at all. Existing equipment may be declared at lower wattages than is the case and photocells maybe declared with lower burn hours than the cells on the street. It has also been known for photocells to be declared where none exist, for example in bollards or signs. All these inventory inaccuracies effectively reduce the true energy consumed by the street lighting equipment and result in the Lighting Authority being under billed for their electricity. The differences between declared load and actual load contribute distribution losses. A precondition to any Lighting Authority introducing CMS which is recognised by the local DNO must be a signed connection agreement and the provision of an up to date inventory which must meet a minimum accuracy level. Before United Utilities can grant CMS status to a Lighting Authority sufficient safeguards would need to be put in place to ensure that equipment declared as CMS are in fact CMS. United Utilities also need to know what the full cost implications of introducing CMS will be both in terms of additional FTE activity for the UMSO and MA and IT costs for updating the charge codes in Lamp and any software upgrades. This information will need to come from St Clements Services and Symology. The contacts at these organisations are Bob Glover and David Anders. Any Lighting Authority wishing to introduce a CMS system would need to make a formal written application to the distribution company. Also the connection agreement may need to be changed to accommodate any new obligations placed on either party. It must also be a requirement that the Lighting Authority agree to their inventory being audited before a CMS system is introduced. If the inventory does not meet the minimum accuracy level required			As the respondent states, a connection agreement is necessary – this may contain the condition that a sufficiently up to date and accurate inventory must be provided. CMS EMs would need to be certified as other EM types must be. Various components of CMS apparatus require certification. UMSOs may consider all this information to reach a decision. The onus on UMSOs would be the production of a control file. Any software upgrades would be between UMSOs and the software provider. This is not stated explicitly but is correct. The connection agreement would need to reflect

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		by the DNO then CMS status would be refused. It is important that before CMS is introduced the manufacturers should produce evidence to back up the power values of lamps which have been dimmed. For example a lamp which has been dimmed to 50% light out put does not reduce the power level by 50%. To help with this exercise it would be useful to obtain the power and consumption data for the many CMS test sites currently in operation around the UK. CMS systems have the capability of accurately recording the consumption and load values of individual lamps. Why are we not using these systems as an effective meter? This would eliminate the need to record this type of equipment on an inventory.			all requirements. Load research would be required to ascertain the relationship between dimming and power consumption.
IMServ Europe	-	-	X	0	
Siemens Energy Services	✓	**Impact Comment**: This would require a system change	✓	90	Comment noted.
Scottish and Southern Energy plc	✓	In the SVA Catalogue definition for Equivalent Meter Type under 'Notes' it says 'Name of equivalent meter used for unmetered supply' – is the intention to provide a list of EMs and update it each time a new EM is approved?	X	0	Comment noted. Currently the SVA Catalogue definition specifies under Notes 'Lamp or Flare' – this would be replaced by a note that EM Type is the 'name of the equivalent meter used for unmetered supply'. A list of EMs, updated as necessary, would be provided (this will be available on the Elexon website).
EDF Energy, Supplier Response	✓	-	X	-	

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
United Utilities (MOP)	X	**Disagree Change Comment**: a) This development represents at best a 'half way house' - whilst the CMS concept will provide accurate switching time data, it will not improve the quality of load rating data which is already the major source of inaccuracy in HH UMS consumption data. Indeed, increased use of dimming without accurate knowledge of dimmed load ratings will further reduce accuracy of consumption data. b) With a modicum of additional effort, modern CMS systems could be further developed to provide accurate metered data, obviating the need to have unmetered supplies with their inherent inaccuracy. c) Major changes to Equivalent Meter software will be required, generating significant costs for MAs in buying, testing and validating software. These costs may not be recoverable from end customers under existing contracts	✓	180	Discussed these issues with the respondent. Load research will establish the correlation between the dimming of lighting and the consequent reduction in power usage, however the respondent maintains that the proposal would not take full advantage of the capabilities of CMS, and reiterated point b) (opposite), noting that the load rating data will not be improved because the CMS would not be used to measure the actual loading of apparatus. Though it may technically be possible to use CMS to produce a system that effectively acts as a meter, issues exist around what legally constitutes a meter. Criteria for qualification as a meter that are endorsed by Ofgem are not met by CMS. The respondent believes that this issue would not be insurmountable, that CMS would not need to be certified, and it has not been considered that by treating UMS as an exempt supply CMS would not require certification under Schedule 7 of the Electricity Act 1989.

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Western Power Distribution	✓	**Implementation Comment**: We will need to make system changes if this CP is approved and will need up to 6 months to arrange this and implement. We would therefore consider a Feb 2008 implementation to be more appropriate than November 2007.	✓	180	Comments noted.
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	-	-	-	-	
SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	**Agree Change Comment**: The adoption of CMS will benefit the HH UMS market by allowing greater adoption of energy saving apparatus and better accuracy at Settlement. The changes to the documents will therefore allow the adoption of CMS technology. **Other comments**: We are comfortable with the concept of adding additional controls over the apparatus but would express caution at any move by current NHH sites looking to utilise this HH development. It should be noted that these multi-control sites may well exceed the allowed wattage under current Unmetered Supplies criteria.	-	90	Comments noted.
EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	✓	**Agree Change Comment**: Although we agree with the principles of this CP, the proposed implementation date of November 07 is unrealistic as IT systems changes will be required. **Impact Comment**: The IT System Changes required will involve having the new functionality built into our UMSO system to deliver the 'Control File' in the prescribed format. We will also require the development of software tools to enable our interpretation of the Operational Log. **Other Comment**: Whilst accepting vocal pressure from equipment manufacturers and others with vested interests the reality is that	✓	180	Comments noted.

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
		few, if any, local authorities currently have plans to role out CMS systems on a substantive scale. Three large local authorities in our distribution regions are seeking to reduce electricity consumption. However, one is changing to Half Night and Pre-Dawn Switching using conventional technology and the other two are pursuing the Havard Electronic Gear option which offers fixed part-night dimming. The cost of full CMS systems would appear to inhibit significant take-up for the foreseeable future. Whilst the mechanisms must be brought in one might reasonably question the true urgency. Delaying implementation to 2008 would allow both UMSO's and other industry parties to incorporate the required changes into our normal software release pattern.			
E.ON UK Energy Services Limited	-	**Neutral Comment**: As a HHDC we do not handle un metered supplies	X	-	Comment noted.
Terry Wilkinson, Independent Consultant on UMS	✓	-	-	-	Spoke to respondent, who argued strongly that the November implementation would be pragmatic and achievable.
Central Networks	✓	**Impact Comment**: UMSO – Our Inventory Management system will require changes to enable production of the control file. It is not been possible to obtain a cost from our system software provider nor a lead in time. MA – The indicative charge for developing our MA system balanced against the income received from existing customers show that it would not be cost effective to change our system. **Implementation Comment**: As an UMSO we anticipate being able to comply with the CP by the proposed November release date.	✓	-	Comments noted.

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
Npower Limited, Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited	✓	**Agree Change Comment**: Whilst we fully support the principles of CP1196, which will enable the opportunity for more sophisticated energy management in the Unmetered Supply market , we wish to temper this approval with the contention that the proposed implementation date of November 2007 is somewhat demanding. We are concerned that there are still issues around the introduction of Central Management Systems which have not been sufficiently resolved at this point, for example, those such as the technical detail on the percentages of Dimming which would be included in the Unmetered Supplies Operational Information. We recommend that an implementation date of February 2009 is agreed, rather than the November 2007 release date proposed by CP1196, to allow adequate time for robust definition of the necessary detail, and associated system and process developments, to enable all relevant market participants to properly implement this beneficial and important function. **Implementation Comment**: See above, we recommend implementing this in the February 2009 release.	-	-	Comments noted. Spoke to respondent. Clarified that they believe that a February 2009 implementation would be more likely to give enough time to fully resolve the issues noted in their response. They believe that a February 2008 implementation may still be insufficient time to resolve the issues.
British Energy Direct Ltd	X	**Disagree Change Comment**: Although supportive in principle, we seek clarification of the apparent possibility of the customer fulfilling the MA role. If the customer were to fulfil the MA role, a separate MA would be superfluous. However, should the customer adopt the role of MA, it should be accredited.	X	0	Comments noted. It is anticipated that it would be possible for the customer to also be the MA, but as noted by the respondent the MA role would still need to be accredited. Spoke this to the respondent, who was satisfied with this explanation. The respondent changed their stance to agreement of the change, on the proviso that it is

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Organisation	Agree (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSCCo Response
					clarified in the CP/Panel committee paper that a customer acting as MA would need to be accredited as an MA.
Power Data Associates	✓	**Impact Comment**: Systems, operational procedures & commercial agreements **Implementation Comment**: Nov 07 release is fine	✓	-	Comments noted.

Comments on Redline text

No.	Organisation	Section	Comments	BSCCo Recommendation
1	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc	BSCP 520 – Page 10 Section 4.5.2.3 (a)	Our view is that the final paragraph could be difficult to interpret. Our suggestion is the following revision: "The CMS controller devices operating each item of equipment should be summed and provided as a row(s) in the file body. Each different type of CMS controller shall have its own Charge Code and will be assigned a continuous Switch Regime of 998 and a CMS Unit Reference of 'Control".	BSCCo agrees, and believes the paragraph may be clarified without affecting its intent. The paragraph as currently drafted is: The control equipment (charge codes commencing with 9) controlling the CMS equipment should be summed and provided as a row(s) within the file body for each different type of control equipment Charge Code with a continuous Switch Regime of 998 and CMS Unit Reference of 'Control'. BSCCo recommends the following amendment, to clarify as suggested: The CMS controller devices operating each item of equipment should be summed and provided as a row(s) in the file body. Each different type of CMS controller shall have its own Charge Code and will be assigned a continuous Switch Regime of 998 and a CMS Unit Reference of 'Control'
2	Terry Wilkinson, Independent	Page 2, section	When CMS is required the MA does not require a copy of the summary inventory. The MA	BSCCo agrees, and also suggests removal of the deletion of 'to the MA' from the end of the paragraph, as this does not appear in the

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No.	Organisation	Section	Comments	BSCCo Recommendation
	Consultant on UMS	1.3.8, 2nd paragraph, 2nd sentence.	requires a control file.	current BSCP520 so does not need to be deleted (i.e. this is an error in the redline drafting). BSCCo recommends that BSCP520, 1.3.8, 2nd paragraph, be amended as below: Current drafting: The Supplier shall advise the UMSO of the appointed MA. The UMSO shall send a copy of the current summary inventory to the MA of an EM appointed for an MSID. Where the UMSO requires more than one PECU array to be installed for an MSID, the summary inventory shall identify the Apparatus, suitably codified, to be assigned to each PECU array. Where a CMS is required, the UMSO shall create and send a control file to the MA detailing the Apparatus that is to be managed by the CMS~~, to the MA~~. Proposed amendment: The Supplier shall advise the UMSO of the appointed MA. The UMSO shall send a copy of the current summary inventory to the MA of a~~n~~ passive EM or dynamic PECU EM appointed for an MSID. Where the UMSO requires more than one PECU array to be installed for an MSID, the summary inventory shall identify the Apparatus, suitably codified, to be assigned to each PECU array. Where a CMS is required, the UMSO shall create and send a control file to the MA detailing the Apparatus that is to be managed by the CMS.
3	Terry Wilkinson, Independent Consultant on UMS	Page 6, section 3.13,	It is not clear that approval can be sought for either a) A CMS system producing the output file specified in section 4.5.2.3, sub-section (c); or b) A Dynamic Meter which accepts the files specified in section 4.5.2.3, sub-sections (a) and (c) and generates the HH data; or c) A system which combines the functions of	BSCCo agrees that this could be made clearer, and recommends that the following text be added to redlined BSCP520, section 4.5, following the second paragraph: It should be noted that with regard to dynamic meters using CMS Data, approval may be sought for either: • A dynamic meter, i.e. a system that meets the requirements of an MA system as specified in 4.5.2.3 (e.g. that it can accept the files described in 4.5.2.3 a) and 4.5.2.3 c)); • A CMS, i.e. a system that meets the requirements of a CMS

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No.	Organisation	Section	Comments	BSCCo Recommendation
			(a) and (b).	as specified in 4.5.2.3 (e.g. that can produce the file described in 4.5.2.3 c)); or • A system that combines the functions of a CMS and a dynamic meter MA system in a single application, i.e. that meets all the requirements as specified in 4.5.2.3).
4	Terry Wilkinson, Independent Consultant on UMS	Page 9, section 4.5.2.3, sub-section (a)	The filename should be specified. I suggest Filename: controlmmmmmmmmyyyymmdd.log where: mmmmmmm = Sub-Meter ID (alphanumeric) yyyymmdd = date of inventory log = file extension with all characters in lower case	BSCCo agrees that the filename for the control information file may be specified in the same way as the switching time and load information described later in the BSCP. BSCCo recommends that the redline changes suggested by the respondent should therefore be inserted into BSCP520, section 4.5.2.3 a), between the paragraph of text and the file header information.
5	Central Networks	BSCP520 Para 1.2.1 e)	Previously the UMSO has been responsible for deciding what type of Equivalent Meter is used in its distribution area. We have previously declined the use of passive meters which rely on assumed switching times and take no account of weather conditions e.g. cloud cover affecting light levels. We have always insisted on dynamic meters which use actual switching data and in our opinion provide greater consumption data accuracy as a consequence. As my understanding of CMS is that it is a dynamic system then this change would appear to be superfluous and seems to diminish the UMSO power to insist on dynamic meters.	BSCCo disagrees and recommends that no change is required; the change referred to is intended to reflect that it is likely to be the Supplier that suggests use of a different EM type, but the UMSO would retain the ability to agree or disagree the type of EM. Therefore UMSOs would have, for example, as much ability as at present to decline the use of a passive EM.

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Appendix 9 - Detailed analysis of CP1200

1 Introduction

1.1 CP1200 'Removal of requirement for Proving Test Out of Timescale Escalation Report' was raised by Scottish and Southern Energy plc on 4 May 2007.

1.2 CP1200 is related to CP1173 'Proving Test Out of Timescale Escalation Report' which, has been approved for implementation in the June 2007 Release. CP1173 proposes the change to remove the requirement to send a 'Notification of Failure to Carry Out Proving Test' (P0212 flow) to the ELEXON.

1.3 The need for the P0212 flow to be sent to the BSCCo was incorporated to facilitate Supplementary Monitoring carried out by ELEXON. This was done in response to issues surrounding MOAs initiating proving tests. HHDCs were required to monitor the performance of proving tests carried out by MOAs because MOAs were failing to carry out these tests.

1.4 Under CP1173, the P0212 flow would continue to be sent to Suppliers to indicate where HHDCs believed that a Proving Test should have been carried out, but one had not been initiated by the MOA.

1.5 The justification for removing the requirements detailed in CP1173 is that 'the situation has improved to a sufficient degree that the BSCCo does not need to monitor the process'. Furthermore, industry response to the CP1173 and subsequent discussion at SAF with a representation of DCs indicates that a number of Agents do not (and have never) run this report. The situation has therefore improved without the use of this process. For these reasons, CP1200 proposes that the P0212 flow is not required at all and should be removed.

2 Solution

2.1 The proposed solution is to remove the requirement for the HHDC to report to the Supplier and MOA that a proving test has not been initiated, from any Code Subsidiary Documents and Configurable Items that it may affect. Therefore, the following is required to be removed:

1. BSCP502 sections 4.6.4 and 3.5.6
2. BSCP514 sections 5.5.6. and 8.3.4

Items 1 and 2 are BSCP sections containing the requirements for the HHDC to report that no proving test has been initiated.

3. P0212 data flow from SVA Data Catalogue Volume 1

Item 3 is the data flow which relates to the 'Notification of Failure to Carry out a Proving Test'

4. Data items, which are contained solely in the P0212 data flow, from SVA Data Catalogue Volume 2. They are as follows:

'Expected Proving Test Completion Date'

'HHMO Responsible for Metering System'

The data items in 4 will not be useful without the P0212 flow and should therefore be removed.

3 Participant Impact Assessment

3.1 CP1200 was issued for participant impact assessment on 4 May 2007 as part of CPC00604. 13 responses were received of which, 10 agreed, 0 disagreed and 3 were neutral.

3.2 The overall response from industry is in favour of CP1200. Two respondents (HHDCs) felt strongly about approving CP1200. Of these, one respondent felt that it was an unbeneficial overhead cost to Data Collectors, which could not be linked to any improvements in the Proving Test process over the last 18 months. This respondent also indicated that a change to the Wheatley system, which is used by a number of Meter Operators, has ensured that Proving Tests are requested when required. For this reason, they felt this negated the need for the monitoring of whether Proving Tests have not been carried out.

3.3 The other respondent felt that was not possible to fully comply with a requirement to report that a proving test has not been carried out and that, if necessary, it should be a requirement that should be audited instead of being reported by the HHDC.

3.4 One respondent who was neutral to the change stated that they have their own measures in place to ensure proving tests are completed in a compliant manner.

3.5 Another respondent, who was neutral, felt that there was not suitable justification for the proposal but left the decision to the SVG.

3.6 The number of days required for implementation of CP1200, from all respondents, falls in the range of 0 – 90 days. This range is within the scheduled timescale for proposed implementation in November 2007.

4 Recommendation

4.1 ELEXON's recommendation, based upon unanimous industry agreement, is to approve CP1200 for inclusion in the November 2007 Systems Release.

IA Summary for CP1200

CP No.	Title	IA History CPC number	Results of Party/Party Agent IA	Impacts
1200	Removal of Requirement for Proving Test Out of Timescale Escalation Report	CPC00604	10 Agree to the Change 0 Disagreed to the Change 3 Neutral to the Change	BSCP502 BSCP514 SVA Data Catalogue Volume 1 SVA Data Catalogue Volume 2

Impact Assessment Responses

Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Gemserv Ltd	-	-	-	-	-
IMServ Europe	✓	Agree Change Comment: As both a MOP and a DC we strongly support the removal of this requirement as this report cannot and has not provided the benefit that was originally expected. Due to the nature of the processes in question, it is not possible to provide a totally comprehensive and accurate report: any output therefore carries many caveats and is subject to dispute by the parties involved, thus causing doubt and at worst disregard for the instances reported. IMServ DC has attempted to run the report on several occasions, however for the above reasons has not implemented this as a regular process. It is reported that other Agents have	X	0	Comment noted.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
		taken a similar approach - in our role as a Meter Operator we have not received a report from another Data Collector for at least the last eighteen months. It can therefore be assumed that any improvements in the Proving Test process are not the result of the report in question. The fact that a CP was approved to remove the originator of the original requirements from the circulation of the report, reinforces the view that this process adds overheads to Data Collectors, Meter Operators and Suppliers for no perceivable benefit. Furthermore a recent system change to the Wheatley system (used by a number of Meter Operators) now ensures that Proving Tests are requested in the required instances. This provides the double benefit of reinforcing the Proving Test process and also negating the need for a monitoring process.			
Siemens Energy Services	✓	-	✓	90	-
Scottish and Southern Energy plc	✓	-	X	0	-
EDF Energy	✓	-	X	-	-
United Utilities	-	**Neutral Comment**: We have our own controls and processes in place to help ensure proving tests are completed in a compliant way.	-	-	Comment noted.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Western Power Distribution	✓	-		30	-
E.ON UK plc, Powergen Retail Ltd, Citigen (London) Ltd, Economy Power	✓	-	X	0	-
SAIC Ltd. **Response provided on behalf of:** ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Transmission Ltd.	✓	-	X	90	-
E.ON UK Energy Services Limited	✓	**Impact Comment**: Limited changes to LWPs	✓	-	Comment noted.
SSIL HHDC	✓	**Agree Change Comment**: We strongly agree with this proposal. Reporting outstanding Proving Tests could never have been fully complied with by the HHDC. The requirement to request Proving Tests is an obligation on the MOP and if policing is required to ensure compliance, then this should be a role for Audit not HHDC. **Impact Comment**: No action required.	X	-	Comment noted.
Npower Limited,	-	**Neutral Comment**: Whilst it is recognised	-	-	Comment noted.

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Organisation	Agreement (✓/X)	Comments	Impact (✓/X)	Days Required to Implement	BSSCo Response
Npower Northern Limited, Npower Northern Supply Limited, Npower Yorkshire Limited, Npower Yorkshire Supply Limited, Npower Direct Limited		that the situation has improved such that BSCCo no longer receives the Proving Test Out of Timescale Report, it is still noted in the change proposal that the issue is not completely resolved. Whilst a number of Agents do not/have never used the report we do not think that this is suitable justification for the proposal and would reinforce the need for the DC to be compliant with current requirements. However, if SVG concludes that the issue is sufficiently improved to allow confidence that all Proving Tests are carried out in a timely manner then we do not anticipate any excessive system or process changes as a result.			
British Energy Direct Ltd	✓	**Impact Comment**: A review and update to our processes will be required	✓	30	Comment noted.

Comments on Redline text

There were no comments on Redlined text.

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Appendix 10 – Status of all open Draft Change Proposals and Change Proposals

New Draft Change Proposals (remove table if no new DCPs raised)

DCP	CVA/SVA	Title	Description	Raised	Status
0008	SVA	Changes to the Change of Profile Class Process set out in BSCP516	DCP0008 seeks to make changes to the Change of Profile Class Process set out in BSCP516, following the outcomes of the CP1177 issue group.	8 June 2007	DCP0008 was issued for Industry Impact Assessment on 8 June 2007. Responses are due back on 6 July 2007.

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Status of Open Change Proposals

There are currently **27** open CPs. **1** CP is owned solely by the ISG, **1** CP is solely owned by the Trading Disputes Committee (TDC), **19** CPs are solely owned by the SVG and **6** CPs are co-owned by the ISG and SVG.

Owned solely by the ISG

Assessment	**0**		
Committee	**1**	**-**	**CP1197**
Implementation	**0**		
Approved	**0**		

Owned solely by the SVG

Assessment	**4**	**-**	**CP1166 v3.0, CP1192, CP1199**
Committee	**5**	**-**	**CP1189, CP1190, CP1191, CP1196, CP1200**
Implementation	**11**	**-**	**CP1162, CP1173, CP1178, CP1179, CP1180, CP1181, CP1183 v2.0, CP1184 v2.0, CP1186, CP1187, CP1188**
Approved	**0**		

Owned solely by the TDC

Assessment	**1**	**-**	**CP1198**
Committee	**0**		
Implementation	**0**		
Approved	**0**		

Co-owned by the ISG and SVG

Assessment	**1**	**-**	**CP1201**
Committee	**4**	**-**	**CP1182 v3.0, CP1193, CP1194, CP1195**
Implementation	**1**	**-**	**CP1174 v2.0**
Approved	**0**		

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Release Plan

Future BSC Systems Releases

		Release Date		
		June 2007 Potential Scope	**November 2007 Potential Scope**	**February 2008 Potential Scope**
Change Proposals	**Pending**		1182, 1189, 1190, 1193, 1194, 1195, 1196, 1197, 1200	1166, 1191, 1192, 1198, 1199, 1201
	Approved for Implementation	1162, 1173, 1174, 1178, 1179, 1181, 1186	1180, 1183, 1184, 1188	1187
Modifications	**Pending**			
	Approved			
Other				
Commentary on Significant changes since March Panel			CP1185 v2.0 rejected by the SVG on 1 May 2007. CP1188 approved by the SVG on 1 May 2007	The BSC Panel approved CP1187 v2.0 on 10 May 2007.

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Stand Alone Implementations

Modification Ref. No.	Title	Date Final Modification Report (to be) sent to Authority	Recommendation	Implementation Date
P197	SVA Qualification Processes Review	14 June 2006	Reject Proposed Modification Approve Alternative Modification	Alternative Modification Approved by Authority on 10 August 2006. Implementation date is 23 August 2007.
P209	Change of Code References from BSCP531 to BSCP537'	14 February 2007	Approve Proposed Modification	Proposed Modification Approved by Authority on 16 March 2007. Implementation date is 23 August 2007.

Key to Release Plan

Change Proposals and Modification Proposals in **BLACK** text represent SVA changes.

Change Proposals and Modification Proposals in **RED** text represent CVA changes.

Change Proposals and Modification Proposals in **BLUE** text represent changes which impact both the SVA and CVA arrangements.

The release Implementation Date and related Authority decision dates are provided in the following format:		
Pnnn (< date) P or A ✗ or ✓ where:		
Pnnn is the Modification Proposal number		
(< date) is the date by which a determination must be made by the Authority in order for the Modification Proposal to be implemented within the indicated release		
P✓ Indicates that the Panel's recommendation to the Authority was to Approve the proposed Modification		
P✗ Indicates that the Panel's recommendation to the Authority was to Reject the proposed Modification		
A✓ Indicates that the Panel's recommendation to the Authority was to Approve the Alternative Modification		
A✗ Indicates that the Panel's recommendation to the Authority was to Reject the Alternative Modification		
~~**Pnnn (< date) P or A ✗ or ✓**~~ indicates that the Authority decision date for that Modification Proposal has passed		
Pnnn (< date) P or A ✗ or ✓ (in *italics*) indicates that the Modification Report will be submitted to a future Panel meeting. This date and recommendation represent ELEXON's "provisional thinking".		

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