

Modification Proposal P63
'Change of Contract Management of MPANs for Data
Collector, Data Aggregator and Meter Operators'

High Level Requirements Specification

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b Distribution

Name	Organisation
Volume Allocation Modification Group	
Parties	
Party Agents	
BSC Central Service Agent	

c Related Documents

Reference 1	P63 Modification Proposal (6 January 2002)
Reference 2	P63 Initial Written Assessment (11 January 2002)
Reference 3	P63 Definition Report (8 March 2002)
Reference 4	P63 Assessment Consultation 1 (28 March 2002)
Reference 5	P63 Definition Consultation (20 February 2002)
Reference 6	Data Transfer Catalogue
Reference 7	BSC SVA Data Catalogue

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1 INTRODUCTION

1.1 BACKGROUND AND SCOPE

This document provides a requirements specification for a Bulk Transfer process for Non Half Hourly Metering Systems¹.

Modification Proposal P63 (P63) was raised by British Gas Trading on 6 January 2002 and an Initial Written Assessment (Reference 2) was presented to the Panel on 17 January 2002. P63 is aimed at overcoming the issue with the current Change of Party Agent process which was designed to be performed on an individual basis, Metering System by Metering System. The process does not attempt to cater for large numbers of Metering Systems undergoing a change of Party Agent simultaneously.

P63 suggests that there are existing constraints within the trading rules that prevent individual Parties making more than 20,000 changes of Party Agent in any working day. It should be noted that the existing rules do not include any such restriction. Any constraint identified during the assessment of P63 relates more to the ability of a Parties, Party Agents and Supplier Meter Registration Agents (SMRA) to adequately process the relevant Change of Agent data flows within a single working day.

P63 seeks to introduce an obligation on Suppliers, their Agents and SMRAs to be able to deal with larger numbers of simultaneous changes of Party Agent ("Bulk Transfer") than current system and process constraints allow. P63 proposes that this obligation be included in the Code and that supporting processes should be defined within Code Subsidiary Documents.

At the meeting on 17 January 2002, the Panel agreed that issues raised by P63 required further definition and P63 was submitted to a two-month Definition Procedure by the Volume Allocation Modification Group (VAMG). A Definition Report (reference 3) was presented to the Panel meeting on 14 March 2002. The Panel agreed that P63 should be submitted to a three-month Assessment Procedure by the VAMG with an interim report presented to the Panel meeting on 16 May 2002. Given the complex changes to systems and processes that may result from the implementation of P63, this Interim Report was intended to confirm the adequacy or otherwise of the Assessment Procedure timetable and to seek an extension to this timetable if appropriate. The Panel also requested that the VAMG assess a possible Alternative Modification that dealt with the Bulk Transfer in the event of a Party Agent failure.

During the Definition Procedure a number of implementation options were considered by the VAMG. The VAMG recognised that in order to fully assess whether P63 should be recommended, further information was needed from Parties, Party Agents and SMRAs in order to identify the constraints that existed within their systems and processes and to provide an understanding of the reasons for these constraints.

Accordingly, a consultation document (Reference 4) was issued by the VAMG on 28 March 2002. Recognising the potential commercial sensitivity of the consultation questions, the VAMG determined that the consultation responses would have any identifying particulars removed prior to publication.

¹ Half Hourly Metering Systems have not been included on the basis that it is unlikely that such a Bulk Transfer Process would be initiated.

The responses to the consultation were considered by the VAMG on 16 April 2002 which noted that the constraints identified by respondents to the consultation were considerably lower than those identified by the proposer of P63. The VAMG also noted that there was little or no rationale provided to justify such constraints, but that some of the constraints identified by, in particular SMRAs, could be alleviated if the Supplier were to enter into commercial arrangements with each SMRA.

The VAMG also considered a solution suggested by the proposer of P63 which proposed a Bulk Transfer process for transferring the relevant data to the affected Parties and Party Agents. The VAMG considered the effects of such a Bulk Transfer process on the quality of data entering Settlement. The VAMG concluded, that whilst the inconsistencies in the quality of data would be more visible, there would not necessarily be a degradation of its quality if the appropriate checks were put in place to ensure that only qualified Supplier Hubs were allowed to initiate such a Bulk Transfer process.

It was on this basis that the VAMG concluded that further assessment of the proposed Bulk Transfer process was needed and requested ELEXON to develop a high level requirements specification for such a process.

2 PURPOSE AND STRUCTURE OF DOCUMENT

The primary purpose of this document is to specify the requirements for the requisite changes to the Code, BSC Systems, Code Subsidiary Documents and other Configurable Items, to enable all impacted BSC Agents, Parties, SMRAs, Party Agents and documentation owners to provide a view on whether the Applicable Objectives are better facilitated

Section J 4.2 of the Code currently states that any change of Party Agent will be carried out in accordance with the relevant Balancing and Settlement Code Procedure (BSCP). On the face of it this appear to facilitate the Bulk Transfer from one Party Agent to another. However, the relevant BSCPs appear to be based on the implicit assumption that the processes as described will be initiated for each transfer of Party Agent responsibility for each Metering System.

This requirements specification does not attempt to define the detailed processes required within the relevant BSCPs but instead defines the principles that any solution will need to adhere to in order to be successfully executed.

2.1 Triggers to the Bulk Transfer Process

There are two possible triggers to the Bulk Transfer process. One is a voluntary approach by a Supplier for commercial reasons, for example the conclusion of an existing Party Agent contract. The second is a forced approach in the case of Agent Failure. In the context of P63, Agent Failure is deemed to be the circumstances where a Party Agent is no longer able to fulfil their obligations under the relevant BSCPs, i.e. either when the Accreditation of the Party Agent was removed or if the Party Agent goes out of business. It is possible that an Administrator or Receiver appointed for a Party Agent could initiate a Trade Sale of the business; it is assumed that this will be excluded from the definition of Agent Failure as a Party Agent may still be able to fulfil its obligations.

2.2 Overview of Bulk Transfer Process using an alternative Data Transfer Mechanism

One of the problems within the existing process for Change of Agent is that the overall control of the process transfers from Party to Party Agent and that information relating to the status of any particular transfer from one Party Agent to another is not readily available. Failure of any one of the steps within the process might contribute to a protracted Change of Agent process. It is therefore vital for any Bulk Transfer process that the responsibility for and the control of the process remains with the Supplier initiating the Bulk Transfer. The initiating Supplier will be responsible for the provision of all of the data required by any new Party Agent and at the VAMG meeting on 2 May 2002 it was proposed that a new obligation on the Supplier is introduced to facilitate this. This would have been similar to the existing obligation on the Supplier [via Section W of the Code] that obliges the Supplier to retain data for the 3 years after the relevant Settlement Day which is currently discharged to Party Agents. The VAMG considered whether it was appropriate to mandate that all Suppliers retain the relevant information even if they did not plan to initiate a Bulk Transfer. The VAMG concluded that in the circumstances of a voluntary Supplier initiated Bulk Transfer it was not appropriate to force the initiating to maintain this data within his systems and that they could enter into commercial agreements to meet this obligations.

The VAMG did however consider that it may be appropriate to include such an obligation on all Suppliers if an Alternative Modification were progressed to look at encompassing Agent Failure. Under this process the reliance on the previous Party Agent could not be guaranteed. This possible new obligation would mean that the Bulk Transfer Process could cope more easily with Agent Failure.

A number of different implementation options have been discussed during the assessment of Modification Proposal P63, these are described in more detail within the Definition Report. One of these options attempts to use an alternative means of transfer of data, i.e. that of using a central source for all data and transferring this data to the relevant parties by the use of a CD-ROM². It is this option that is discussed further within this requirements specification.

Details of the proposed certification criteria are included in Annex 1.

Figure 2.1, shows a high level process that could be used during any Bulk Transfer. Each of the steps within the process are described in further detail within Section 2.3 of this document.

² It is possible that the data required to be sent will not fit onto a single CD-ROM in which case multiple CD-ROMs will be distributed.

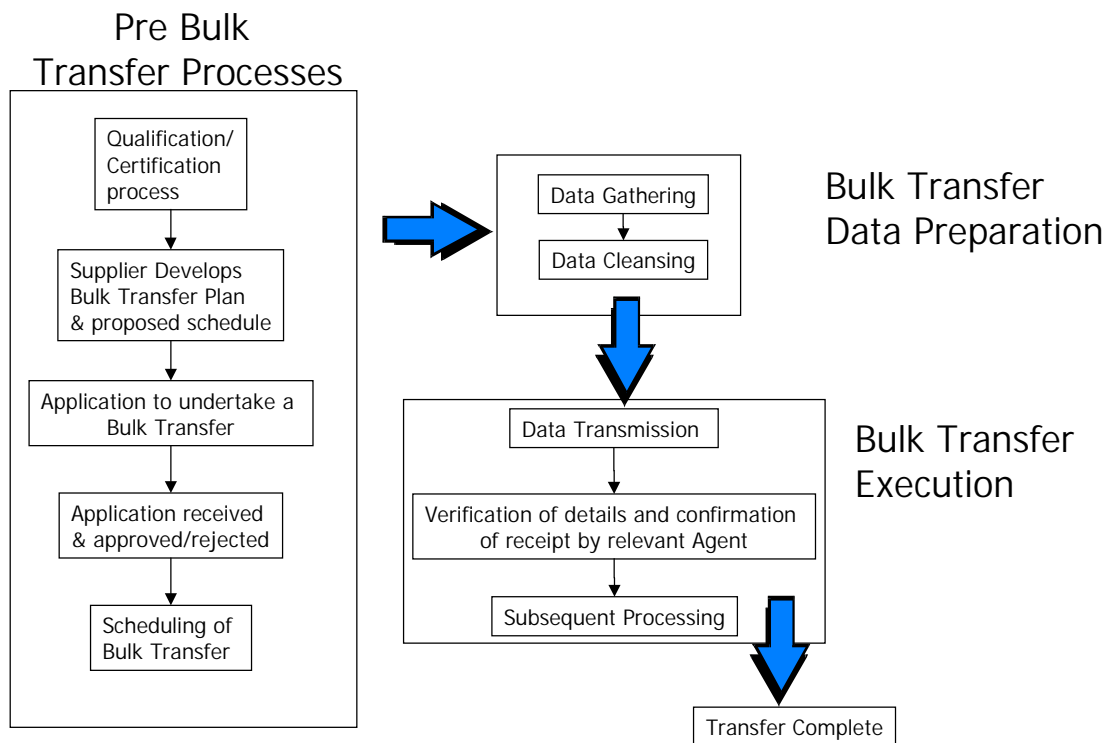


Figure 2.1 Overview of proposed Bulk Transfer Process

2.3 Pre-Bulk Transfer Processes

The processes described within this section outline those activities that would need to be undertaken prior to a Supplier being in a position to voluntarily initiate a Bulk Transfer Process.

2.3.1 Qualification / Re-Certification Process

In order to ensure that the Bulk Transfer Process does not adversely affect the quality of data entering Settlement, the VAMG has proposed that Suppliers who wish to invoke the voluntary Bulk Transfer process, undergo some form of qualification / re-certification process for the Supplier Hub that they wish to transfer Party Agent appointments to. It is anticipated that this will be in the form of a self certification process whereby the Supplier confirms that the new Supplier Hub meets certain qualification criteria. It is likely that the criteria will include items such as whether there are sufficiently trained staff in place to undertake the processing of the Bulk Transfer etc.

Details of the qualification criteria are included within Annex 1.

2.3.2 Development of Bulk Transfer Plan and Schedule

Following successful completion of the qualification / certification process the Supplier will be in a position to plan and schedule a Bulk Transfer Process. This procedure will involve the Supplier discussing the proposal with each of the new Party Agents and the relevant SMRAs to ensure that the volume has been appropriately considered by all of the affected parties. It is assumed that the Supplier will then be in a position to agree a draft schedule with all of the relevant Agents on a Distribution Business Area by Distribution Business Area basis.

2.3.3 Application to undertake a Bulk Transfer

It is proposed that in order to undertake the Bulk Transfer Process, the initiating Supplier will need to complete and submit an application form to ELEXON.

The application form should include confirmation from each of the relevant agents that they are in a position to conform to the proposed plan.

2.3.4 Application received and Approved/Rejected

The application to undertake a Bulk Transfer process will be received by ELEXON and presented to the Performance Assurance Board (PAB). The application will contain a proposed schedule and a copy of the plan prepared by the Supplier. It will be for the PAB to assess the merits of the application together with their proposed plan and to determine whether or not to allow the Supplier to proceed with their plan. The VAMG discussed whether it was appropriate to prescribe within the Code the criteria PAB would use in order to determine whether or not to approve a proposed Bulk Transfer. The VAMG decided that it was more appropriate to allow the PAB to develop their own guidelines that were not hard-wired into the Code. The VAMG considered that this approach would be more appropriate by making it easier to introduce any required changes in the light of experience gained by PAB. The PAB may approve the application dependent on certain criteria being fulfilled prior to initiation of the transfer.

2.3.5 Scheduling of Bulk Transfer

It is assumed that the Bulk Transfer processes will be carried out by the relevant Party Agents outside normal working hours probably on a weekend. It is therefore possible that more than one Supplier may wish to initiate a Bulk Transfer process during the same time period. There may therefore, be a requirement to centrally schedule the Bulk Transfer Processes of different Suppliers so as to avoid any possible clash. ELEXON will oversee this activity.

In the case of Agent Failure, the Bulk Transfer Process will also need to be centrally co-ordinated.

2.4 Bulk Transfer Data Preparation

2.4.1 Data Gathering

It is assumed that in order for the Bulk Transfer Process to be executed successfully and in a reasonable timeframe, the Supplier initiating the Bulk Transfer Process is responsible at all times for ensuring that the relevant data is passed onto the appropriate Party Agent. The VAMG discussed whether it was appropriate to introduce an obligation on the initiating Supplier to store this information within their systems. The VAMG concluded that this was not an appropriate thing to expect all Suppliers to be obliged to do, particularly if they had no intention of undertaking a Bulk Transfer process. If the Supplier does not already possess relevant up to date data, the Supplier will be required to collect and collate such data prior to starting the Bulk Transfer Process. This data will then be required to be transferred onto CD-ROM(s) in the format prescribed by the Data Transfer Catalogue (Reference 6) and BSC SVA Data Catalogue. The reason for choosing this format is that it is an existing industry standard and would minimise any impact on software systems receiving it.

2.4.2 Data Cleansing

This process ensures that the data collected under 2.4.1 does not introduce any degradation of the quality of data entering Settlement. It is probable that this process could involve a trial run of the data transmission processes, described in step 2.5.1 outside of normal working hours, in order to ensure that any Metering Systems that would ordinarily cause exception flows to be generated are eliminated from the Bulk Transfer process. Exceptions greater than a threshold percentage value should prevent any Bulk Transfer process from being initiated.

2.5 Bulk Transfer Processes

2.5.1 Data Transmission to Parties

This is the process of passing the details of the Metering Systems to each of the relevant Party Agents. This would be undertaken by the sending of a CD-ROM from the initiating Supplier to each of the relevant Party Agents. The CD-ROM contents will be in a prescribed format³ identifying, each of the Metering Systems to be transferred to the new Party Agent, a count of the Metering Systems being transferred, the effective date of the transfer, details of the old Party Agents, Metering Equipment Technical Details, Meter Reading and EAC/AA history⁴. However, it is assumed that even though the CD-ROM may contain more information than any particular Party Agent may require, each Party Agent will read the disk and extract the data they require in order to undertake their obligations. The relevant Party Agent will need to pre-process this data so that it is in a format useable by them.

2.5.2 Verification of details, Confirmation of Receipt of Data and Processing of Data

Each Party Agent and SMRA will be required to confirm the receipt of data electronically on a separate CD-ROM⁵. Such confirmation should include confirmation of the relevant Metering System Identifier, a count of Metering Systems being transferred and the effective date of the transfer. It is anticipated that if the relevant Parties choose to read the data flows into their existing systems they should be able to suppress any automatic responses being sent over the Data Transfer Network (DTN) as a result of the receipt of these data flows.

2.5.3 Exception Handling

The new Party Agent will be required to identify all instances where incomplete / invalid data has been received. The Party Agent would report this to the Supplier who will be responsible for resourcing these exceptions within pre-defined timescales. It is suggested that ELEXON be notified of the progress of exception handling activities.

2.5.4 Subsequent Processing

There may be some activities that out of necessity cannot be initiated by the Supplier alone. For example whilst a Non Half Hourly Data Aggregator (NHHDA) confirms receipt of an appointment flow and confirms this appointment, the NHHDA does not undertake any aggregation until the SMRA formally notifies the NHHDA to commence their aggregation activities. It may also be possible that this process can be eliminated if it can be agreed that in

³ It is possible and would seem pragmatic that this format will be the same as existing data flows as this is a standard currently in use within the industry.

⁴ It is anticipated that rules will be specified so that the previous two meters reading and the last EAC are transferred.

⁵ The confirmation of receipt should not be a direct copy of the existing CD-ROM sent by the Supplier. Instead the relevant Agent should create the contents of the CD-ROM by processing it through their systems and creating the appropriate output files.

the event of a Bulk Transfer, this obligation could be changed such that the NHHDA commences aggregation activities from the effective date of the transfer as supplied by the initiating Supplier rather than on notification from the SMRA.

2.6 New Obligations to be introduced

This document describes a high level overview of a Bulk Transfer Process that includes references to the Supplier collating the relevant information in order to pass this onto the new Party Agents. If this obligation were to be fulfilled then the process to be adopted in the event of Agent Failure would be similar to that adopted under a planned Bulk Transfer.

3 CHANGES REQUIRED TO THE CODE, CODE SUBSIDIARY DOCUMENTS, OTHER CONFIGURABLE ITEMS & INDUSTRY DOCUMENTS

This section defines the amendments that would be required to the Code, BSC Systems, Code Subsidiary Documents and other configurable items.

3.1 Code

There would be an impact on the following Sections of the Code:

- Section J 'Party Agents' – A new paragraph would be inserted to introduce the obligation on Suppliers and SMRAs to undertake the Bulk Transfer process.
- Annex X1 would require an additional definition of the "Bulk Change of Agent" process

3.2 Code Subsidiary Documents

The detailed processes used in relation to each Party Agent will need to be developed within either a new BSCP or by extension to the following Code Subsidiary Documents:

BSCP 501 – Supplier Meter Registration Service;

BSCP 504 – Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS;

BSCP 505 - Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS;

Party Service Lines 110 , PSL 120, PSL 130, PSL 140, PSL 150 and PSL 160.

BSC SVA Data Catalogue.

Self Accreditation Certification Requirements (SACR)

3.3 Business Process Model

This revised process would be incorporated within the Business Process Model.

3.4 Potential Changes to Core Industry Documentation

The Master Registration Agreement will require amendment to introduce the new obligations on SMRA, therefore the Joint Change Control process will be initiated. It is not believed that any changes are required to any other Core Industry Documents.

ANNEX 1 – CERTIFICATION CRITERIA

Certain information will be required to be provided by those Suppliers wishing to initiate the Bulk Transfer process. Where such an application is made, ELEXON and MRASCo will be required to validate the ability of the Supplier to process the Bulk Transfer process without adversely impacting the integrity of settlements. Therefore below is a list of the key requirements which should be met in order to consider whether or not a Supplier's application to initiate a Bulk Transfer process is valid. Additionally PAB may develop its own set of guidelines which will take into account the performance of the Party Agent that Supplier is transferring to.

No	Action	Responsibility
1	The Supplier will provide: <ul style="list-style-type: none"> a) A signed undertaking from a director outlining the reasons why a bulk change of agent is required and also stating that all liabilities for completing the process successfully lie with that Supplier. b) A detailed timetable outlining the proposed implementation approach. c) Evidence that their database can cope with the additional Metering Systems. d) Evidence that exception handling processes are in place. e) Evidence that systems / processes are compliant with the BSC and MRA obligations. f) Evidence that staff are fully trained. 	Supplier
2	The Supplier will have met any PAB defined criteria.	ELEXON
3	The Supplier will have met the MRA obligations relating to performance if PAB feel this is appropriate.	MRASCo
4	The Agents of the Supplier will have been re-certified where required to do so to enable the take on of additional Metering Systems.	ELEXON / Supplier

It is intended that this criteria will be included within an appropriate Code Subsidiary Document and may be expanded.