SVG97/01

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| **Meeting name** | Supplier Volume Allocation Group |
| **Date of meeting** | 03 March 2009 |
| **Paper title** | Change Proposal Progression |
| **Purpose of paper** | For Decision |
| **Synopsis** | This paper provides:<br>• 13 Change Proposals (CPs) for decision; and<br>• details of the status of all Open Draft Change Proposals (DCPs) and CPs. |

# 1 Introduction

1.1 This paper provides details of 13 Change Proposals (CPs) for you to consider and agree on their progression. ELEXON has assessed the CPs, and Parties/Party Agents impact assessed the changes via Change Proposal Circular (CPC) 00651, with the exceptions of CP1265 and CP1266 which were assessed via CPC00650. In light of these assessments ELEXON invite the SVG to decide whether to approve or reject the CPs.

1.2 We have grouped the CPs by subject area:

- Meter Technical Details – CP1248
- Microgeneration – CP1260, CP1276
- Market Domain Data – CP1260, CP1270, CP1271
- Unmetered Supplies – CP1272, CP1277
- Advanced Metering – CP1273, CP1274
- Clarifying/Improving Documents – CP1265, CP1266, CP1279

# 2 Meter Technical Details Change

2.1 <u>CP1248 v2.0 – Early release of Meter Technical Details by the Non Half Hourly Meter Operator Agent</u>

2.1.1 CP1248 proposes to amend BSCP514 to reduce the time allowed for the NHHMOA to release the MTD to the Supplier, NHHDC, LDSO, current NHHMOA to new NHHMOA, and NHHMOA to HHMOA.

2.1.2 E.ON raised CP1248 v1.0 on 4 July 2008. Following the industry impact assessment (in July 2008) CP1248 has been updated to v2.0. Version 2.0 includes amended timescales for BSCP514 (from 2 Working Days to send MTDs in CP1248 v1.0 to 5 Working Days in CP1248 v2.0). CP1248 v2.0 also recommends that the changes in BSCP514 are reflected in the PARMS system.

2.1.3 During industry Impact Assessment we received, 16 responses of which, 9 agreed, 5 disagreed and 2 were neutral. The respondents who agreed with the change highlighted that:

- the change will result in improvements for the Supplier MOA and Customer;
- This change should have a beneficial impact on the timely transfer of MTD, leaving less time for inaccuracy due to interim change of configuration on site;
- for NHHDC agents the receipt of D0150/D0149 is critical for the set up of customer on the system. Ensuring that there is a common approach by all NHHMOA to submit the MTD

within 5 working days of receipt of a D0148 will be beneficial for all concerned (MOA, Suppliers, LDSOs and NHHDCs); and

- the proposal will increase efficiency of the end to end process.

2.1.4 The respondents who disagreed highlighted the following issues:

- tight timescales for instances that need manual intervention;
- inconsistency with other NHH and HH MO processes;
- further changes could be made to PARMS to make NHH and HH more consistent;
- this is an agent management rather than a Settlement issue;
- this won't help for flows that are already being sent late; and
- Suppliers will need to chase more flows.

2.1.5 We have discussed the responses with E.ON and the respondents and addressed the concerns where possible. Full details of the comments, E.ON's response to the comments and how we have addressed them is provided in Appendix 1 on pages 19 to 26.

2.1.6 In light of majority support from the industry and that CP1248 would mean that metering information is available earlier, allowing proper validation by the NHHDC, which will lead to an increase in actual readings entering Settlement; ELEXON's recommendation is to:

- agree the redline text amendments to BSCP514 section 10; and
- approve CP1248 v2.0 for inclusion in the November 2009 Systems Release.

# 3 Microgeneration Changes

3.1 CP1260 - 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)' and CP1276 - 'Process following the Installation of Small Scale Third Party Generating Plant (Alternative to CP1260)

3.1.1 ELEXON raised CP1260 on 27 August 2008, as one half of the solution presented in DCP0030. We presented CP1260 to the SVG in November and December 2008, but the SVG could not make a unanimous decision, and the CP was referred to the Panel.

3.1.2 Before the Panel meeting in January, Npower raised CP1276.

3.1.3 The Panel requested ELEXON ask participants to compare the 2 changes and provide details of the comparative costs and impacts of each CP. The Panel referred both CP1260 and CP1276 back to the SVG for decision on 3 March 2009.

3.1.4 CP1260 aims to introduce a single method of communication for Suppliers to inform MOAs that microgeneration has been installed at a NHH site.

3.1.5 It requires the Import Supplier to send a D0001[1] flow to the MOA, within 10 days of becoming aware that Export could be occurring at the site with the Import meter. The MOA sends back a D0002[2] flow as a result of the inspection, and the D0149[3] and D0150[4] flows if they have replaced the Meter.

[1] D0001 - Request Metering System Investigation
[2] D0002 - Fault Resolution Report or Request for Decision on Further Action
[3] D0149 - Notification of Mapping Details
[4] D0150 - Non Half-hourly Meter Technical Details

3.1.6 CP1276 aims to introduce a single solution, but with the option of an alternative (at the Suppliers discretion) approach to communication for Suppliers to request their MOAs to check the Meter cannot run backwards, providing they have appropriate commercial arrangements in place.

3.1.7 CP1276 would require the Import Supplier to send a D0142[5] flow to the MOA, within 10 days of becoming aware of Export occurring at the site with the Import Meter. The MOA sends back a D0002 flow if no action is required (i.e. the meter already has a backstop), or a D0010[6] with initial meter readings, and the D0149 and D0150 flows if the Meter required replacing.

3.1.8 At the request of the Panel, we issued an addendum to CPC00651 for industry impact assessment on 16 January 2009 to allow CP1260 and CP1276 to be considered beside each other. We received 18 responses, of which, 5 supported the approval of CP1260, 5 supported the approval of CP1276, 2 supported neither solution and 6 were neutral.

3.1.9 The industry is evenly split in its preference for CP1260 and CP1276; however the majority of industry members would prefer that neither CP is approved as the alternative to their choice. The current baseline allows Suppliers to select the flow which is best fit for the circumstances. This is because the BSC obligation on Suppliers, is to ensure that Import and Export are measured separately (meaning that the Import Meter must not run backwards when the site is exporting).

3.1.10 Comments on the proposed redlining of BSCP514 were received for both CPs, If you do approve either CP, the redline amendments that we recommend are made are detailed in Appendix 2 on pages 45 to 47.

3.1.11 Full details of the industry responses and how we have responded to them are provided in Appendix 2 on pages 33 to 45.

3.1.12 ELEXON recommends, based on the industry views on CP1260 and CP1276, that the SVG:

- agree that a single mandatory solution is not workable;
- note MOAs would prefer a single solution;
- reject CP1276 based on the D0142 flow not being the suitable flow for the likelihood of the need to have a meter replaced, and because referring to 'commercial contractual arrangements' is inappropriate; and
- reject CP1260 based on the inability to gain a unanimous decision, the cost out-weighing the benefit and the industry's majority preference for neither solution than the alternative to their choice;
- ***If you approve either CP:*** agree our suggested amendments to the redlining for CP1260 or CP1276, and agree that either CP1260 should be implemented in November 2009, or CP1276 should be implemented in February 2010.

## 4 Market Domain Data (MDD) Changes

4.1 CP1269 - Publication of Additional Non Half Hourly Combination Data in Market Domain Data

4.1.1 ELEXON raised CP1269 on 9 January 2009 to progress one of the conclusions of the MDD Expert Group. The change will introduce a new entity table within MDD to help Suppliers identify valid combinations of attributes for Supplier Volume Allocation (SVA) Metering Systems.

[5] D0142 - Request for Installation or Change to a Metering System Functionality or the Removal of All Meters
[6] D0010 - Meter Readings

4.1.2 CP1269 involves changes to:

- the MDD database;
- the introduction of a new version of the D0269 and D0270 data flows;
- amendments to participant systems; and
- changes to the processes undertaken by LDSOs and Suppliers.

4.1.3 The change will involve a consequential change to the Data Transfer Catalogue (DTC), which we will progress under Master Registration Agreement (MRA) governance.

4.1.4 When we issued CP1269 for industry Impact Assessment, we received 16 responses of which 10 agreed, 1 disagreed and 5 were neutral. Full details of the industry responses, and how we have responded to them are provided in Appendix 5 on pages 64 to 69.

4.1.5 There is a majority support for the intention and benefits of the CP, however respondents gave differing views on which version of the D0269/D0270 should be decommissioned to make way for the creation of the new flow. Strong views were expressed both by those who favoured decommissioning version 002, and by those who believed that version 003 should be discontinued. We recommend that you agree to decommission version 003, as proposed in the CP and supported by a majority of respondents.

4.1.6 Based on the majority support for the change and that by introducing the proposed entity table in a new version 004 of the D0269 and D0270 efficiency would be improved for Metering System registrations, by reducing the number of registrations which are queried or rejected. We consider that this would deliver benefits to Suppliers, and potentially also to LDSOs. ELEXON recommends that the SVG:

- approve CP1269 for inclusion in the November 2009 Release.

4.2 CP1270 - Improvements to the MDD Process

4.2.1 ELEXON raised CP1270 on 9 January 2009 and progresses another of the conclusions of the MDD Expert Group, which the SVG endorsed in December 2008. The CP will deliver improvements and increased clarity to the MDD process set out in BSCP509 'Changes to Market Domain Data' and BSCP509 Appendix 'MDD Entity Change Request Forms'.

4.2.2 When issued for industry Impact Assessment, we received 14 responses of which 11 agreed with the CP and 3 were neutral. Details of the industry responses and how we have responded are provided in Appendix 6 on pages 74 to 75.

4.2.3 We received one comment on the proposed redline text. It concerned the mandatory field 'address line 1' which was missing in the proposed BSCP509 Appendix redlined extract. We have confirmed with the respondent that the column name appears in the existing BSCP509 Appendix wording, but was inadvertently not included in the redlined text attachment. No amendments are required to the proposed redlining, as the comment relates to the existing BSCP wording rather than the changes proposed by the CP.

4.2.4 ELEXON's recommendation, based on the support from industry and that CP1270 will improve the clarity, and thereby the efficiency, of the MDD change process is that the SVG:

- approve CP1270 for implementation as part of the June 2009 Release.

4.3 CP1271 – Align Market Domain Data (MDD) Approval Timetable to SVG Meetings

4.3.1 ELEXON raised CP1271 on 9 January 2009 to progress another of the conclusions of the MDD Expert Group which the SVG endorsed by in December 2008. The CP will amend the key dates in the MDD approval timetable, so that these relate to the monthly SVG meetings rather than Performance Assurance Board (PAB) meetings.

4.3.2 When we issued CP1271 for industry Impact Assessment we received 15 responses, of which 10 agreed and 5 were neutral. There were no comments on the redline changes. Details of the industry responses are provided in Appendix 7 on page 79.

4.3.3 ELEXON's recommendation, base on the support from industry and that CP1271 will improve the efficiency of the MDD process is that the SVG:

- approve CP1271 for implementation in the June 2009 Release.

# 5 Unmetered Supply Changes

5.1 CP1272 - Use of Appointment and Termination Flows in Unmetered Supplies (UMS)

5.1.1 Suppliers currently submit D0155[7], D0148[8] and D0151[9] flows to the UMSOs. These flows are deemed unnecessary because the UMSO does not require or use this information. The BSC Auditor identified this inefficiency, and the Unmetered Supplier Expert Group (UMSEG) has subsequently sought to address it via this CP.

5.1.2 CP1272 would remove the requirement for Suppliers to send data flows that UMSOs do not require (the D0155, D0148 and D0151) from BSCP520 'Unmetered Suppliers Registered in SMRS'. CP1272 will also ensure that the UMSO is made aware of any changes relating to the Unmetered Supply via the LDSO (by adding a requirement info BSCP501 'Supplier Meter Registration Service'. This solution will align with current processes followed by the UMSO. It is noted that the necessary appointment data would have already been entered into SMRS by the Supplier and so should be available to the UMSO.

5.1.3 When we issued CP1272 for industry Impact Assessment, we received 16 responses; of which, 8 agreed, 2 disagreed and 6 were neutral. No comments were received on the proposed redline text changes.

5.1.4 The two respondents who disagreed believe that the current process assists them in reconciling their information with that of the UMSO. By removing the requirement to send these data flows, there is potential that data inconsistencies could be introduced between the Supplier and the UMSO. ELEXON discussed this with the respondents and highlighted that, at the moment, UMSOs aren't using these data flows. One respondent indicated that although the requirement will be removed from the current process they would continue to submit these flows in order to maintain an audit trail of their updates. Full details of the industry responses and how we have responded are available in Appendix 8 on pages 83 to 87.

5.1.5 ELEXON's recommendation, based upon the majority support for the change and the anticipated improvement to efficiency, is to:

- approve CP1272 for inclusion in the June 2009 Systems Release.

5.2 CP1277 – Change to UMS Charge code Approval Process

[7] D0155 – Notification of Meter Operator or Data Collector Appointment and Terms
[8] D0148 – Notification of Change to Other Parties
[9] D0151 – Termination of Appointment or Contract by Supplier

5.2.1 Scottish and Southern Energy raised CP1277, which proposes to incorporate the UMS Charge Code application process within the scope of MDD - aiming to reduce the length of time taken to approve UMS Charge Codes.

5.2.2 ELEXON would construct Charge Codes in consultation with industry experts (as appropriate). We would use the MDD Change process (as detailed in BSCP509 'Changes to Market Domain Data') as a means for informing/consulting with the industry on the changes and seeking feedback on impacts. This would include an Impact Assessment which goes out to the industry (including LDSOs) as they are the ones most affected by Unmetered equipment. The final stage is approval by the SVG (this is already part of the BSCP509 process).

5.2.3 When we issued CP1277 for industry Impact Assessment, we received 16 responses; of which, 9 agreed, 2 disagreed and 5 were neutral. The two respondents who disagreed raised a number of concerns, full details of these and how we have responded to them are in Appendix 11 on pages 115 to 117. There were no comments on the redline text.

5.2.4 ELEXON's recommendation, based upon increased efficiency, the benefit of removing provisional and temporary codes, and the majority support from impact assessment respondents, is to:

- approve CP1277 for inclusion in the June 2009 Systems Release.

# 6 Advanced Metering Changes

6.1 CP1273 – Changes to the scope of CoP10 to cover current transformer operated Meters

6.1.1 E.ON raised CP1273, which proposes widening the scope of CoP10 ('Code of Practice for Whole Current Metering of Energy via Low Voltage Circuits for Settlement Purposes') to include Current Transformer (CT) operated Meters. This would allow Registrants to have the choice of installing a less expensive CoP10 Meter where they envisage the demand on a site remaining below the mandatory Half Hourly (HH) threshold (100kW), despite requiring CT metering. Alternatively, the Registrant could chose to install a more expensive CoP5 Meter (or above), to meet the requirements for mandatory HH metering should the demand on site exceed the mandatory HH threshold in the future.

6.1.2 CP1273 proposes to add the relevant CT related requirements from CoP5 ('Code of Practice for the Metering of Energy Transfers with a Maximum Demand of up to (and including) 1MW for Settlement Purposes') into CoP10 and remove references to whole current metering in CoP10. In addition to these changes, BSCP601 ('Metering Protocol Approval and Compliance Testing') will need to be changed, to make the relevant changes to CoP10 part of the compliance testing process.

6.1.3 While approving changes to CoP10 falls under the responsibility of the SVG. The ISG and SVG are jointly responsible for approving any changes to BSCP601. Therefore we are presenting CP1273 to the ISG for decision before we present it to the SVG on 03 March 2009.

6.1.4 We received 16 responses to the industry Impact Assessment; of which 10 agreed 2 disagreed and 4 were neutral. No comments were received on the proposed redline text changes.

6.1.5 One neutral respondent queried whether the CP would be better implemented on 06 April 2009 (when the Supplier Licence conditions to install advanced metering become effective) or earlier (as part of the February 2009 Release). It is not possible to implement a change before it is approved, which prevents implementation in the February 2009 Release. A related Modification P230 ('Enabling Interoperability through the use of CoP10 and CoP5 Metering'), if approved by

the Authority, would be implemented in the June 2009 Release, so therefore ELEXON believes that it is beneficial to have the CP1273 changes go-live at the same time.

6.1.6 The two respondents, who disagreed with the change and continue to disagree with the change, raised a number of concerns. We have discussed the concerns with the respondents and attempted to resolve them where possible. Details of these comments and our responses are provided in Appendix 9 on pages 96 to 103.

6.1.7 There is a clear majority support for CP1273. We have noted that concerns regarding the exemption of all CoP10 metering (CT or Whole Current) from proving tests. We believe that the potential Settlement risks are mitigated and/ or can be addressed through other change. Therefore, we recommend that the SVG:

- approve CP1273 for the June 2009 BSC Systems Release, noting that this would align the with the implementation of Modification Proposals P230 (if approved).

6.2 CP1274 – Transfer of Meter Technical Details

6.2.1 Scottish and Southern Energy raised CP1274 on 18 December 2008 on behalf of the Advanced Metering Expert Group. They developed the change as part of the Advanced Metering Operational Framework: Profile Classes 5 to 8.

6.2.2 The purpose of the framework is to facilitate effective market operation and interoperability for Profile Classes 5 to 8. This change will facilitate interoperability on a Change of Supplier where the new Supplier wishes to appoint new agents, as the agents will be able to read the meter only if they have the required communications and password information.

6.2.3 The solution proposed is to place an obligation on MOAs (via BSCP514 and BSCP504) so that the transfer of MTDs is required to include communications and password data for remotely read meters.

6.2.4 When we issued CP1274 for industry Impact Assessment, we received 18 responses; of which, 13 agreed, 1 disagreed and 4 were neutral. Full details of the industry responses received and how we have responded to them are provided in Appendix 10 on pages 102 to 110.

6.2.5 The respondent who disagreed believed that the BSCP514 wording would benefit from including a reference to the data needed by MOAs to remotely configure meters. We agree that this change would be beneficial and recommend that the SVG agree this amendment to the redline text. Details of the amendment to the redlining are available in the responses in Appendix 10 on page 116. The respondent also suggested that the BSCP504 wording should be updated as well. We have discussed this with the respondent, and they now agree that the wording in BSCP504 shouldn't be updated as we do not believe it is intended that DCs should receive the details needed to configure meters (e.g. level 3 passwords).

6.2.6 Provided that the BSCP514 wording is changed as recommended on P108, the respondent who disagreed is now happy with CP1274.

6.2.7 ELEXON's recommendation, based on majority support for the change, and that CP1274 will help facilitate the transfer of additional date for advanced meters is the SVG:

- agree that the minor amendment to the redline text for BSCP514; and
- approve CP1274 for implementation in the June 2009 Systems Release.

# 7 Document Clarification Changes

7.1 CP1265 – Technical Assurance Documentation Changes Following Review

7.1.1 We included CP1265 in last months Change Proposal Progression paper (SVG96/02). However, due to the as the paper was considered via correspondence a unanimous decision could not be obtained; as one SVG member wanted the opportunity to discuss the CP with the rest of the SVG. Therefore we are presenting CP1265 decision again.

7.1.2 In April 2007 we awarded C & C Group Holdings Ltd ('C & C Group') the contract for the role of Technical Assurance Agent (TAA); previously Logica performed this role. We reviewed the TAA related documents and identified changes to reflect that C & C Group now provide the TAA service; and to ensure current TAA activities and obligations are accurately documented.

7.1.3 When issued for industry Impact Assessment, we received 13 responses, of which 10 agreed and 3 were neutral. Full details of the industry Impact Assessment responses are provided in Attachment 3 on pages 51.

7.1.4 One respondent identified a couple of minor typos in the redlining of the CVA and SVA TAA Service Descriptions, which we agree should be amended.

7.1.5 Another respondent noted BSCP27 refers to Performance Assurance Parties, and that this seems to suggest LDSOs may be responsible for rectification. Following discussion the respondent agreed that this issue does not impact CP1265. ELEXON is taking action separately to clarify and address the query. There is no impact on CP1265 due to this comment.

7.1.6 One of the documents impacted by CP1265 is BSCP535, which the PAB is jointly responsible for with the SVG. Therefore we presented the CP1265 to the PAB for endorsement of the change and proposed redlined changes on 29 January 2009. While presenting the CP, a number of PAB members raised concerns about replacing 'reasonable' with 'best' in BSCP27 paragraph 1.13.

7.1.7 They highlighted that the proposed change to paragraph 1.13, would make it inconsistent with the rest of the document, where 'reasonable' is used, which contradicts one of the purposes of the CP, i.e., to ensure consistency across all TAA related documentation. They also commented that the using 'best' introduces a stricter requirement, and would prefer that the wording remains as 'reasonable'.

7.1.8 As a result of this discussion, the PAB endorsed the CP on the provision that we highlight their concern to the ISG and the SVG.

7.1.9 We originally proposed the use of 'best' in BSCP27 Paragraph 1.13, to ensure that participants made all efforts to allow the Metering System Inspection to go ahead. However, if you were to decide to keep the wording in paragraph 1.13 as 'reasonable' rather than using the more onerous 'best' in order to retain consistency and the degree of flexibility around Metering System Inspection, the rest of the CP would be unaffected.

7.1.10 ELEXON's recommendation on the basis of unanimous industry support for CP1265, and that CP1265 will increase the consistency and accuracy of the TAA documents is that the SVG:

- agree to the minor amendments to the redlined text of the SVA TAA Service Description suggested by the industry respondent;
- agree that the use of 'reasonable' in the proposed redlining of BSCP27 paragraph 1.13;
- approve CP1265 for inclusion in the June 2009 Release; and
- note that we have presented CP1265 to the Performance Assurance Board (PAB) for endorsement and Imbalance Settlement Group (ISG) for approval.

7.2 CP1266 – Updates and Refinements to BSCP504

7.2.1 ELEXON raised CP1266 in order to address inconsistencies in BSCP504 ('Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS). Addressing these issues will create consistency between the BSCP504, BSCP508 and the MRA Data Transfer Catalogue.

7.2.2 When we issued CP1266 for industry Impact Assessment, we received 12 responses; of which, 9 agreed, 1 disagreed 2 were neutral. Full details of the responses received and how we have responded to them are provided in Appendix 4 on page 54.

7.2.3 The respondent who disagreed, agreed with all of the changes except one. The respondent did not believe that the proposed solution to the change fully resolves the issue in BSCP504. Following discussion with the respondent they agreed with ELEXON's view that CP1266 addresses the issues that were intended to be resolved by CP1266. We agreed with the respondent that we will review the area they highlighted (separately from this CP), and provide feedback on how their concern could be addressed.

7.2.4 ELEXON's recommendation, based on majority support for CP1266 and the improvements in consistency and robustness of BSCP504, we recommend that the SVG:

- approve CP1266 for inclusion in the June 2009 Systems Release.

7.3 CP1279 – Housekeeping Change to BSCP515 – Licensed Distribution

7.3.1 The SVG agreed to treat CP1279 as a housekeeping change last month (SVG96/02). The CP1279 form and proposed redline changes are provided as Attachment F1 and G1 respectively.

7.3.2 CP1279 will correct an error introduced by the agreed redlining of CP1199 when it was implemented in February 2008.

7.3.3 CP1199 introduced several changes to section 3.3, including moving:

- step 3.3.2 to 3.3.3 - but the reference to 3.3.2 in step 3.3.4 was not updated; and
- step 3.3.3 to 3.3.4 - but didn't update the reference in footnote 4.

7.3.4 Attachments I and J provide full details of the CP and the proposed redlined text to BSCP515.

7.3.5 CP1199 has resulted in implied changes to the requirements on LDSOs, which were clearly not intended. Therefore we believe that this change should be progressed as a Housekeeping CP.

7.3.6 Two participants have highlighted to us that they find this section confusing and are unsure of their obligations. We believe that this minor change will clarify the existing obligations, and prevent further confusion.

7.3.7 Since your last meeting we have emailed all BCA and PACA's to advise them that we have raised CP1279, that you have agreed that it is a Housekeeping CP and that they will not receive an impact assessment request. We haven't received any queries.

7.3.8 ELEXON's recommendation, is that as the CP will correct an error that was not intended by CP1199 that the SVG:

- approve CP1279 for inclusion in the June 2009 Release.

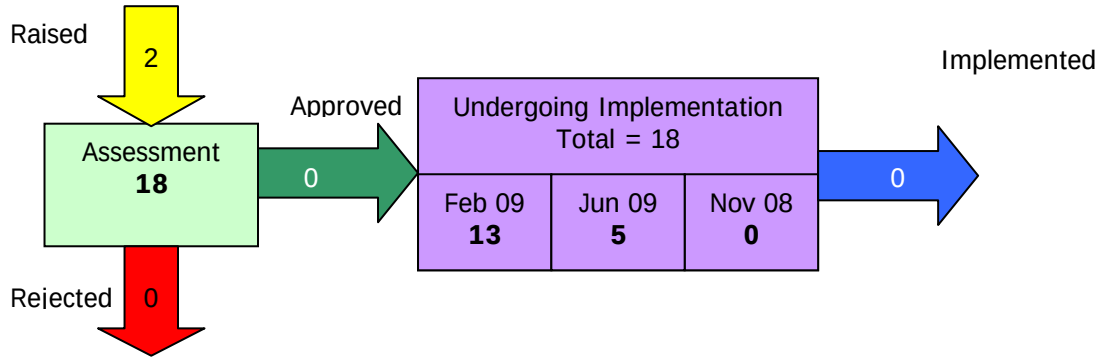
7.4 Implementation Costs

| | BSC Agent (Demand Led) | ELEXON Operational | | Total | | Impacts |
|---|---|---|---|---|---|---|
| | Cost | Man Days | Cost | Cost | Tolerance | |
| CP1248 v2.0 | £4,200 | 3 | £700 | £4,900 | 10% | BSCP514, BSCP533 Appendix A and BSCP533 Appendix B |
| CP1260 | £0 | 2 | £440 | £440 | 10% | BSCP514 |
| CP1265 | £870 | 4.5 | £990 | £1,860 | 10% | SVAA TAA Service Description, CVA TAA Service Description, CVA Data Catalogue, CVA Data Catalogue Annex A, BSCP27, BSCP535, NETA IDD Part 1, NETA IDD Part 2 |
| CP1266 | £0 | 1.5 | £330 | £330 | 10% | BSCP504 |
| CP1269 | £73,775 | 57 | £12,540 | £86,315 | 10% | BSCP509, BSC509 Appendix, SVA Data Catalogue Vol. 1 and Vol. 2 |
| CP1270 | £0 | 3.5 | £770 | £770 | 10% | BSCP509, BSCP509 Appendix |
| CP1271 | £0 | 10 | £2,200 | £2,200 | 10% | BSCP509 |
| CP1272 | £0 | 3 | £660 | £660 | 10% | BSCP501, BSCP520 |
| CP1273 | £0 | 4 | £880 | £880 | 10% | CoP10, BSCP601 |
| CP1274 | £0 | 2 | £400 | £400 | 10% | BSCP504, BSCP514 |
| CP1276 | £0 | 1.5 | £330 | £330 | 10% | BSCP514 |
| CP1277 | £0 | 6 | £1,320 | £1,320 | 10% | BSCP520 |
| CP1279 | £0 | 0 | £0 | £0 | 10% | BSCP515 |

## 8 Summary of Open Change Proposals

8.1 There are currently **36** Open CPs, SVG own **24** CPs, **10** CPs are co-owned by the SVG and Imbalance Settlement Group (ISG), and the ISG own the remaining 2 CPs. 2 new CPs have been

raised since the last SVG meeting. Details of the new CPs are provided in Appendix 12 on page 118.




Please note:

- The numbers in the boxes indicate current number of CPs in a given phase.
- The numbers in arrows show the variance in the past month.

8.2 There is currently **1** open DCP. No new DCPs have been raised since the previous meeting.

## 9 Recommendations

9.1 The SVG is invited to:

a) **AGREE** to the redline amendments to the SVA TAA Service Description for CP1265;

b) **AGREE** to retain reasonable in the redlining for BSCP27 paragraph 1.13 for CP1265;

c) **AGREE** the redline text amendment to the redline of BSCP514 for CP1274;

d) **APPROVE** CP1265, CP1266, CP1270, CP1271, CP1272, CP1273, CP1274, CP1277 and C1279 for inclusion in the June 2009 Release;

e) **AGREE** the redline text amendment to BSCP514 section 10 for CP1248 v2.0;

f) **APPROVE** CP1248 v2.0 and CP1269 for inclusion in the November 2009 Systems Release;

g) **REJECT** CP1260 and CP1276;

h) If you approve either CP1260 or CP1276, **AGREE** our suggested amendments to the redlining for CP1260 or CP1276 and **AGREE** that CP1260 should be implemented in November 2009, or CP1276 should be implemented in February 2010;

i) **NOTE** that no further CPs will be presented for inclusion in the June 2009 release; and

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

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***List of Appendices:***

Appendix 1 – Detailed Analysis of CP1248 v2.0
Appendix 2 – Detailed Analysis of CP1260 and CP1276
Appendix 3 – Detailed Analysis of CP1265

Appendix 4 – Detailed Analysis of CP1266
Appendix 5 – Detailed Analysis of CP1269
Appendix 6 – Detailed Analysis of CP1270
Appendix 7 – Detailed Analysis of CP1271
Appendix 8 – Detailed Analysis of CP1272
Appendix 9 – Detailed Analysis of CP1273
Appendix 10 – Detailed Analysis of CP1274
Appendix 11 – Detailed Analysis of CP1277
Appendix 12 – New Draft Change Proposals and Change Proposals
Appendix 13 – Release Information

***List of Attachments:***

Attachment A – CP1248 - BSCP514 redlined
Attachment B – CP1248 – BSCP533 Appendix A v13.0 redlined
Attachment C – CP1248 – BSCP533 Appendix B v14.0 redlined
Attachment D – CP1248 – Supporting information
Attachment E – CP1260 – BSCP514 redlined
Attachment F – CP1276 – BSCP514 redlined
Attachment G – CP1276 – Ofgem Analysis
Attachment H – CP1265 – SVA TAA Service Description redlined
Attachment I – CP1265 – CVA TAA Service Description redlined
Attachment J – CP1265 – CVA Data Catalogue redlined
Attachment K – CP1265 – CVA Data Catalogue Annex A redlined
Attachment L – CP1265 – BSCP27 redlined
Attachment M – CP1265 – BSCP535 redlined
Attachment N – CP1265 – NETA IDD Part 1 redlined
Attachment O – CP1265 – NETA IDD Part 2 redlined
Attachment P – CP1266 – BSCP504 redlined
Attachment Q – CP1269 – BSCP509 redlined
Attachment R – CP1269 – BSCP509 Appendix redlined
Attachment S – CP1269 – SVA Data Catalogue Part 1 and Part 2 Redlined
Attachment T – CP1270 – BSCP509 redlined
Attachment U – CP1270 – BSCP509 Appendix redlined
Attachment V – CP1271 – BSCP509 redlined
Attachment W – CP1272 – BSCP501 redlined
Attachment X – CP1272 – BSCP520 redlined
Attachment Y – CP1273 – CoP10 redlined
Attachment Z – CP1273 – BSCP601 redlined
Attachment A1 – CP1274 – BSCP504 redlined
Attachment B1 – CP1274 – BSCP514 redlined
Attachment C1 – CP1277 – BSCP520 redlined
Attachment D1 – CP1279 Form
Attachment E1 – CP1279 – BSCP515 redlined

**Appendix 1 – Detailed Analysis of CP1248 v2.0 - Early Release of Meter Technical Details by the Non Half Hourly Meter Operator Agent**

# 1 Why Change?

1.1 E.ON raised CP1248 v1.0 'Early Release of Meter Technical Details by the Non Half Hourly Meter Operator Agent' in July 2008. We sent CP1248 v1.0 for impact assessment[10] and received a mixed set of responses (8 agreed, 4 disagreed and 3 neutral responses). Following discussion with E.ON CP1248 v2.0 was drafted.

1.2 E.ON raised CP1248 because their analysis of the timings around the Change of Supply D0149/D0150[11] flows from Meter Operator Agents (MOAs) showed that:

- The majority of MOAs issue these flows to the Supplier approximately two days after receipt of the D0148[12] flow into their systems.
- Not all MOAs issue the D0149/D0150 flows based upon the receipt of the D0148 and some hold the flows until the Supply Start Date which can be significantly later. This results in the customer's record being set up unnecessarily late in the Suppliers' systems.

1.3 The E.ON analysis is available in attachment D.

1.4 E.ON have highlighted that issuing D0149/D0150 flows on a timely basis enables Suppliers to progress Change of Supply registrations swiftly, allowing punctual set up of the customer within the Suppliers' systems. This has benefits to the Supplier, customer and MOA.

1.5 Therefore E.ON is recommending, via CP1248 v2.0, that we reduce the timescales for sending the D0149/D0150 in some circumstances.

# 2 Solution

2.1 Reduce the time allowed for the NHHMOA to release the Meter Technical Details (MTDs) to the Supplier, Non Half Hourly Data Collector (NHHDC) and Licensed Distribution System Operator (LDSO) from 10 Working Days to 5 Working Days. Where there has been a:

1. change of Supplier but no change to Metering System or change of NHHMOA; or
2. change of NHHDC for an existing Metering System.

2.2 Reduce the time allowed for the current NHHMOA to send the MTDs to the new NHHMOA, from 10 Working Days to 5 Working Days. Where there has been a:

3. change of NHHMOA, but no change of Metering System or Change of Supplier; or
4. concurrent change of NHHMOA and Supplier but no change to the Metering System.

Changes 3 and 4 would reduce the total timescale between the NHHMOA receiving the D0148 flow and the D0149/D0150 flows being released from 22 Working Days (WDs) to 12 WDs for each scenario. Changes 1 and 2 would reduce the overall same timescale from 10 to 5 WDs.

2.3 CP1248 v2.0 would also change 2 PARMS Serials:

[10] As part of CPC00638
[11] Notification of Mapping Details/ Non Half Hourly Meter Technical Details
[12] Notification of Change to Other Parties

- NM03 'Provision of NHH METD to NHHDC (t-1)'; and
- NM04 'Provision of NHH METD to New NHHMO (t-1)'.

Currently MOAs have to report any instances of D0149/D0150 flows that are sent more than 10WDs after being requested. MOAs will need to report any instances later than 5WDs.

2.4 **Version 2.0 – what's different?**

2.5 CP1248 v2.0 is different from v1.0 in 2 main ways, it includes:

- Different timescales for BSCP514 (v1.0 suggested 2WDs to send MTDs, v2.0 suggests 5WDs).
- Changes to the PARMS reporting to reflect the timescale changes in BSCP514 (one of the recipients to the v1.0 impact assessment suggested this).

# 3 Intended Benefits

3.1 E.ON have suggested that CP1248 v2.0 will provide the following benefits for Suppliers and customers:

- Reduction in the number of late flows that require investigation;
- Metering information set up prior to the opening meter read window which allows proper validation of readings by the NHHDC;
- Increased number of D0071[13] being sent to the NHHDC and therefore used as the opening read (increase in number of actual opening reads);
- Customers records fully set up in Suppliers systems earlier;
- Reduction in customer queries around first bill readings due to read validation;
- Reduction in credit management queries around first bills due to read validation;
- Reduction in customer complaints around delayed registrations;
- Improved settlement data due to increase of validated readings;
- Reduction in reliance on Customer Transfer Programme process due to increase in validated readings; and
- Improved promptness of initial D0019 from NHHDC.

3.2 In addition, E.ON believe that CP1248 will benefit MOAs, in that all flows will be issued to the Supplier when the D0148 is processed therefore Suppliers will not be chasing MOAs for anything other than genuinely 'stuck' flows.

# 4 Impacts and Costs

| Market Participant | Cost/Impact | Implementation time needed |
|---|---|---|
| BSC Agent (Application Development – PARMS) | Estimated cost (to implement changes to the PARMS System): £4,200 | June Release suitable |
| ELEXON (Implementation) | Estimated cost (to implement the document changes): £700 | June Release suitable |

[13] Customer Own Reading or Supplier Estimated Reading on Change of Supplier

| Market Participant | Cost/Impact | Implementation time needed |
|---|---|---|
| NHH Meter Operator Agents[14] | NHH MOAs will need to revise their PARMS Reports to capture the revised timescales<br>System and/or process changes are also needed (depending on individual participant systems) | 30-270 WDs – 4 MOAs indicated that the June Release is not achievable |
| NHH Data Collectors[14] | 1 NHHDC indicated that they will need to make changes to their internal processes | 30 WDs |
| Suppliers[14] | System and/or process changes | Zero WDs/ Not provided |

## 5 Implementation

5.1 E.ON is keen for this change to be implemented as soon as possible. June 2009 is the next available release. Several NHH MOAs would prefer to implement CP1248 v2.0 in the November 2009 Release. For these NHH MOAs:

- one indicated that June 2009 is possible, but very tight and November 2009 would be preferable; and
- the other three indicated that June is not achievable given there are other Party Agent system changes already approved under MRA governance. These respondents highlighted that November 2009 would be achievable.

5.2 Therefore ELEXON recommend that CP1248 is implemented in November 2009. We have discussed this with E.ON who have confirmed that they are comfortable with this approach.

## 6 Views from Industry

6.1 We issued CP1248 v2.0 for participant impact assessment on 9 January 2009 as part of CPC00651. We received 16 responses of which, 9 agreed, 5 disagreed and 2 were neutral. Those who agreed with CP1248 noted the following:

- *We support the change for the realisation of the benefits described within the CP. We believe this will result in improvements for the Supplier MOA and Customer.*
- *This change should have a beneficial impact on the timely transfer of MTD, leaving less time for inaccuracy due to interim change of configuration on site.*
- *As an NHHDC agent the receipt of D0150/D0149 is critical for the set up of customer on the system. Ensuring that there is a common approach by all NHHMOA to submit the MTD within 5 working days of receipt of a D0148 will be beneficial for all concerned (MOA, Suppliers, LDSOs and NHHDCs).*
- *We agree on the basis that this proposal will increase efficiency of the end to end process.*

6.2 Those who disagreed raised the following concerns:

- *As the majority of MOAs are already achieving the timescales suggested, there is little advantage in this CP. This is more of an Agent Management issue, if MOs are holding back flows.*

[14] We have taken this information from the impact assessment responses provided.

- *There are occasions where these timescales will be too tight - respondents gave several different examples, most relating to the MO receiving an incomplete/incorrect D0148, or the Supplier sending the D0148 early.*
- *Reducing the timescales will only increase the number of flows that Suppliers will be chasing. As they will be chasing them earlier (at 5WDs instead of 10WDs).*
- *This CP would result in different timescales for different processes in BSCP514. This would make the current timescales and processes less clear. It would be better to look at all of the MO processes together and make any changes across the board.*
- *The PARMS changes proposed are minimal – more could be done to increase consistency between NHH and HH requirements; this should be done as part of this CP.*

6.3 We have discussed all of the comments received with E.ON and with the participant(s) who raised them:

| Issue | E.ON Response/Comments |
|---|---|
| Tight timescales for instances that need manual intervention | E.ON is keen to speed up the process for all flows. They note that some flows may arrive outside the 5 WDs allowed, but highlight that their analysis indicates that most flows already arrive within 5WDs so the numbers should be small. |
| Inconsistency with other NHH and HH MO processes | E.ON has focused on the processes cause them problems. These are the ones that are most important to E.ON as they allow them to set up accounts and start billing more quickly. We note that further changes could be made at a future date to shorten other timescales within BSCP514, if it is considered beneficial. |
| Further changes could be made to PARMS to make NHH and HH more consistent | E.ON has focused on processes that cause them problems. The PARMS changes proposed by this CP are restricted to include only those that reflect the timescale changes to BSCP514. |
| Agent management rather than a Settlement issue | E.ON has considered other ways to make these changes (including contractual methods) but believe that there are benefits to Settlement as well as Suppliers, customers and more generally across the market. Therefore it is appropriate to seek to revise the BSCP. |
| This won't help for flows that are already being sent late | E.ON has confirmed that the issue is not that flows are sent after the deadline, but very shortly before it. This CP would reduce the time allowed, and so would speed up some flows. |
| Suppliers will need to chase more flows | E.ON note that they will expect flows earlier, and so have more time between the date the flow is expected by and the date that they need the information. This gives them more time to chase for missing information. E.ON have confirmed that they would rather be aware of these instances earlier, so that they have longer to chase flows. |

6.4 Further details of the responses received and ELEXON's responses are included in the tables at the end of this CP Assessment Report.

## 7 Redlined Text Changes

7.1 We did not receive any comments on the redline text during the industry impact assessment. When undertaking a final review of the text, we have noted one minor omission. Section 10 of BSCP514 includes a reference to PARMS Serials NM03 and NM04. This requires updating to reflect

 

the updates made to the BSCP533 Appendices. The 'Service Levels' column the table in section 10.2 should be updated as follows:

- Row 4: '100% issued to NHHDC within ~~10~~5WDs of required date'
- Row 5: '100% issued to New MOA within ~~10~~5WDs of required date'

7.2 The redline text sent for impact assessment is available in attachments A to C.

# 8 Recommendation

8.1 The table below sets out the pros and cons of implementing CP1248 v2.0.

| Pros | Cons |
|---|---|
| Metering information is more likely to be set up prior to the opening meter read window which allows proper validation of readings by the NHHDC<br>Increase in number of actual opening reads<br>Reduction in reliance on Customer Transfer Programme process due to increase in validated readings<br>Improved settlement due to increase of validated readings<br>*Customers and Suppliers may also see these non-Settlement related benefits:*<br>Reduction in customer queries around first bill readings due to read validation<br>Reduction in credit management queries around first bills due to read validation<br>Reduction in customer complaints around delayed registrations | Increase in the tight timescales for instances that need manual intervention. This means that Suppliers may be chasing more late flows<br>Creates additional complexity for MOs as the timescales for NHH MO processes as described in BSCP514 will vary from process to process. More extensive changes could resolve this<br>This issue could be resolved in other non-BSC ways (e.g. agent management), at a reduced cost as MOs wouldn't all need to change their systems |

8.2 We appreciate that this change will introduce some additional complexity for MOs and that it will not be possible to send all MTDs within 5WDs. However, we do expect the number of flows sent within 5WDS to increase as flows will not be artificially 'held back' until 10WDs.

8.3 This CP will mean that, where the data is available, the MTDs are provided earlier. This will benefit Settlement by increasing the number of validated, actual opening reads, thereby increasing the accuracy of data used in Settlement.

8.4 Therefore, ELEXON's recommendation is to:

a. agree the redline text amendment to BSCP514 section 10, described in section 7 of this CPAR; and

b. approve CP1248 for inclusion in the November 2009 Systems Release.

**IA Summary for CP1248 v2.0 - Early Release of Meter Technical Details by the Non Half Hourly Meter Operator Agent**

| IA History CPC number | CPC00651 | Impacts | BSCP514, BSCP533 Appendix A and BSCP533 Appendix B |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in | Agreement (✓/X) | Days Required to Implement |
|---|---|---|---|
| **Western Power Distribution** | LDSO / MOA | Yes | - |
| **Scottish and Southern Energy** | Supplier/Generator/ Trader / Party Agent / Distributor | Yes | - |
| **ScottishPower** | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | 30 |
| **IMServ Europe Ltd** | | Yes | 90 |
| **TMA Data Management Ltd** | HHDC, HHDA, NHHDC and NHHDA | Yes | 30 |
| **British Energy Direct Limited** | Supplier | Yes | - |
| **CE Electric UK** | LDSO, UMSO | Yes | - |
| **E.ON** | Supplier – NORW, EELC, EENG, EMEB, PGEN | Yes | - |
| **E.ON UK Energy Services Limited** | MOA NHHDC /DA | Yes | - |
| **EDF Energy** | Supplier, NHH Agent and HH MOP | No | 270 |
| **AccuRead** | NHHDC, NHHDA, NHHMOP, HHMOP | No | - |
| **NPower Limited** | Supplier, Supplier Agents | No | - |
| **Siemens Metering Services** | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO). | No | 120 |
| **Association of Meter Operators** | Trade Association for Meter Operators | No | - |
| **Gemserv** | MRASCo Ltd | Neutral | - |
| **Independent Power Networks** | LDSO, UMSO, SMRA | Neutral | - |

Impact Assessment Responses – additional information[15]

| Organisation | Agree (✓/X) | Comments | Impact (✓/X) | BSSCo Response |
|---|---|---|---|---|
| **Western Power Distribution** | Agree in principle | **Comments:** We don't "sit on" METD if we are capable of sending them. In our experience the main reason for delays is due to failures by other parties | 0 | We called and discussed these comments with WPD. WPD confirmed |

[15] Please note that respondents have only been included in this table where further information was included in their response.

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| | as we already send the data as soon as we can. | although the PARMS serials count these as a failure by us. This observation has already been passed to Elexon.<br><br>It would be useful if the BSCP wording could reflect that we can only send METD if we have received them from the previous agent as, in some cases, we don't receive them despite sending D0170 requests. It would also be useful if the BSCP could reflect that when Suppliers send D0155 and D0148 at the same time, rather than waiting for a D0011 to trigger the D0148, it can prevent automatic sending of the METD which delays the process. | | that they are highlighting 2 key scenarios where sending the MTDs may take longer than 5WDs:<br>1. Where the old MO hasn't sent WPD (as the new MO) the MTD, and therefore they can't send them onto the NHHDC immediately. We discussed this with WPD and agreed that this is an issue only where the old MO is non-compliant with the current BSC timescales and agreed that these types of non-compliance could be resolved through the PAF.<br>2. Where the Supplier sends the appointment flow and a request for MTDs at the same time. This will require manual intervention by the MO, as the Wheatley system is not set up to respond to requests for MTDs where the MO isn't already appointed. This increases the length of time WPD need to process the flow. We confirmed that a Supplier sending the 2 flows at the same time is non-complaint with the BSCP processes.<br><br>WPD noted that these issues were raised in the recent MTD TA check. ELEXON Performance Assurance confirmed that we are planning to assess the extent of these issues across the market (and seek to address non-compliances) in future Technical Assurance checks. |

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| | | | | WPD confirmed that they agree with the principle of this change. |
| **ScottishPower** | Yes | **Comments:** Scottish Power support the change for the realisation of the benefits described within the CP. We believe this will result in improvements for the Supplier MOA and Customer<br>**Impact on Organisation's Systems and/or Processes?** Yes<br>**Capacity in which Organisation is impacted:** Supplier, MOA<br>**Impact on Organisation:** Process changes<br>**Comments:** Though we do not anticipate system changes we would expect changes to be made to our internal processes. | Yes | Comments noted. |
| **IMServ Europe Ltd** | Yes | **Comments:** Reduction from 10 wd to 5 wd should have no systems impact as long as flows are received in a timely fashion identifying other parties, as this is required in order to for the MOA to react by sending MTD.<br>Changes will be required to the PARMS reports.<br>**Capacity in which Organisation is impacted:** MOA<br>**Impact on Organisation:** PARMS Reports require change as currently specified.<br>**Comments:** Changes to PARMS reports are required**.**<br>**Other Comments:** This change should have a beneficial impact on the timely transfer of MTD, leaving less time for inaccuracy due to interim change of configuration on site. | Yes | Comments noted. |
| **TMA Data Management Ltd** | Yes | **Comments:** As an NHHDCs agent the receipt of D0150/D0149 is critical for the set up of customer on the system. Ensuring that there is a common approach by all NHHMOA to submit the MTD within 5 working days of receipt of a D0148 will be beneficial for all concerned (MOA, Suppliers, LDSOs and NHHDC)<br>**Capacity in which Organisation is impacted:** NHHDC<br>**Impact on Organisation:** Process | Yes | Comments noted. |

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|---|---|---|---|---|
| **British Energy Direct Limited** | Yes | **Comments:** Agree although, uncertain if the proposed solution will resolve the existing issues that the proposer is experiencing. | - | Comments noted. |
| **CE Electric UK** | Yes | **Comments:** Agree on the basis that this proposal will increase efficiency of the end to end process. | No | Comments noted. |
| **E.ON UK Energy Services Limited** | Yes | Our current systems are compliant with this change. | No | E.ON ES have confirmed that they are aware of the impact on PARMS reporting for MOs. |
| **EDF Energy** | No | **Comments:** We feel that change as currently specified is likely to lead to more problems as NHH MOP will be working to different timescales depending upon process. Also we disagree with majority of benefits being claimed by this CP. One issue that causes problems is that MOP is unable to process a D0148. Under this change with only 2 days to resolve in many cases this will not be possible and Suppliers will be chasing MOPs so early for missing flows. However, MOP will already be aware of these and as such it will become a time wasting activity and as such will be an issue for MOPs. Many of other supplier and customer benefits mentioned are due to how suppliers register sites and if they do not use other data, such as D0311 flow, in their processes. As such we feel that these are not benefits that can be attributed with certainty to this CP and that many of these can be achieved by other methods currently in the market.<br><br>We do though feel that changes are required in MOP operations but feel that this change is unworkable. There are still a number of scenarios where 10WDs are being allowed for transfer of MTDs. For example, in section 6.2.2.10 on a new connection, section 6.3.3.4 on a meter removal, section 6.3.4 on meter reconfiguration and many others. All of these scenarios could lead to types of problems being mentioned in this change, but these areas are just being ignored. We need to make timescales consistent for all NHH MOP activities and not a sub-section of them. There are also a number of processes that this change does not consider, for example appointment process. Should these also not be amended to be 5WDs as this is another area that would assist in reducing timescales, particularly where Suppliers are registering close to SSD. This change should also be introduced to HH MOPs to bring a single consistent process for both markets.<br><br>We do see that there are problems, although we are concerned as to why those 17% of flows that have been received by Eon prior to them sending out | Yes | We discussed these comments with EDF and they confirmed that; while they understand what E.ON is trying to do, they believe these changes will only add to the complexity of these arrangements. This is because CP1248 will mean that there is more variation in the timescales for sending flows in different processes for MOs (both within the NHH market, and between HH and NHH).<br>EDF confirmed that they believe now is the right time to look at MO process timescales across the board, seeking to simplify and increase consistency between MO processes. They believe the benefits of doing this will be far greater than implementing this CP.<br><br>Following discussion with E.ON, we have confirmed to EDF that E.ON are targeting specific processes within this CP, as these are the ones that are currently causing them issues. E.ON are not adverse to further changes at a later date, but are seeking to resolve issues with these specific processes via this CP.<br><br>EDF have confirmed that the changes |

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| | | any flow to that agent has not also been considered. These flows also indicate an agent that is acting in a non-compliant manner but this seems to be ignored as these would do not support benefits in this change, even though volumes are similar to those that are noted as being an issue with analysis presented as back up data to support this change. We assume that these flows occur because agent believes that they are still agent for an MPAN but they should not make such assumptions and this in particular could be considered as a breech of their obligations under BSC. We feel that these issues also need to be examined and agents required to stop sending flows prior to any request being made.<br><br>In terms of PARMS reporting we would again suggest that NHH MOP processes should be aligned in terms of timescales and PARMS reporting with those for HH MOP. We believe that such changes would give rise to benefits in that MOPs that manage both NHH and HH meters can do so under one set of processes with just differences in flows sent and received. Such a change would also give rise to a swifter response with flows in NHH market which is main aim of this proposal. Given that both NHH and HH MOPs would be operating to same timelines we would consider that a change might be required that looks for 100% of metering information to be provided within 10 days and not current 15 days allowed for in HH market and PARMS reporting. Further reporting should be put in place to ensure that no MOP sends meter technical details prior to a Supplier request. We feel that such an alignment would simplify MOP operations considerably leading to a much more effective overall market.<br><br>**Impact on Organisation's Systems and/or Processes?** System Changes<br><br>**Implementation:** We would not be able to make such changes until November 2009 at earliest due to system changes required.<br><br>**Would implementation in the proposed Release have an adverse impact?** Yes, we cannot schedule these changes to make June release with other MOP changes for that release. | | needed to their internal systems will be expensive and time consuming, due to the differing timescales for different processes. Due to changes recently approved under the MRA (due for implementation in June) and internal projects, EDF have confirmed that they will be unable to implement this CP in June, and even the November 2009 release will be very tight. |
| **AccuRead** | No | **Comments:** If these changes are to be put in place then there are wider ramifications that need to be considered. Such as Section 6.3 of BSCP514, and the timescales for returning jobs etc. This would make the timescales for | Yes | We discussed these comments with AccuRead. They confirmed that while they understand and have sympathy |

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| | | returning jobs inconsistent within the BSCP514. | | for the theory behind the change; they disagree with the approach taken. AccuRead don't believe that these changes would resolve the problem stated (that some MOs 'sit on' the flows when they could be sent). AccuRead would prefer a change where MOs have an obligation to send a flow as soon as they have the data needed.<br><br>AccuRead confirmed that they feel this approach (as taken in CP1248) will increase the complexity (as different processes will have different timescales). This increased complexity could, in their view, worsen the current situation. We confirmed that E.ON's aim to reduce the timescales only for processes that are currently causing them problems, and they do not want to expand the scope of the CP further.<br><br>Accuread have confirmed that the June 2009 release would be very tight due to internal project commitments, but that the November 2009 release would be possible. |
| **NPower Limited** | No | **Comments:** For the vast majority of the scenarios, the reduction from 10 to 5 WDs is not actually an issue for us because the flow processes are already automated and meet this proposed revised deadline. However there are situations where 5 days would become unreasonable and for these reasons we oppose this as a standing target for all scenarios without qualification. Examples of this are:- | Yes | We have discussed these comments with Npower, and they agreed to look into whether it is possible to provide information indicating approximate percentages showing how many of these flows fail or require site visits.<br><br>Npower confirmed that the June 2009 |

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| | | **Failed Flows**<br>Example: Concurrent Change of Supplier and NHHMOA<br>Step 6.2.4.9 is obliging the new MOA to send MTD to parties within 5 days of receiving details from the old MOA. Occasionally these fail validation because the SSC/TPR combinations are invalid, the meter constant is incorrect or the meter manufacturer is not recognised. These issues need time to be resolved and 5 days would be unreasonable and would actually require the current 10 working days.<br>**Site Visits**<br>Example: Change Of Measurement Class HH to NHH - Sending Initial Readings. (7.3.18 & 7.4.18)<br>These processes involve site visits and utilising Field Engineers who undertake work as part of a manual process. Again it would be unreasonable to obtain all the data from site, verify the data and process it all within 5 working days.<br>In summary the vast majority of flows already meet the proposed target but we would not want to see a formal reduction because of the minority of issues as detailed above that require time to resolve.<br>We would be happy for a condition to be added to the BSCP to help qualify this to the effect 'if flow is valid' thus recognising the fact that the majority of MOAs will promptly forward data that does not require any manual attention to fix it. | | release is not achievable due to other (recently approved) MRA changes going live in June. Npower have requested the SVG consider a November 2009 implementation instead.<br>E.ON have confirmed that they do not wish to add wording into the BSCP to make the requirement to send MTDs contingent on the data being sent to the MO being valid. This is because they believe this type of change will weaken the obligation to an unacceptable level. |
| **Siemens Metering Services** | No | **Comments:** Siemens Metering Services fail to see the benefit of this Change Proposal. The CP states that the majority of MOAs already issue the D149/ D150 approx two days after receipt of the D148. If the majority of agents are already performing to this standard, then we do not see the benefit of imposing additional costs for implementing this CP, to all agents.<br>If some MOAs hold off sending the D149/ D150 until the Supplier Start Date, which may be 16 days later, this means that they would already be non-compliant with the current requirement to issue the MTD within 10 days. Reducing the timescale to 5 days would not change this. One would assume that these agents would already have open audit issues relating to delays in | Yes | We discussed these comments with Siemens. They confirmed that they don't see the benefit of these changes, given that most flows are sent quickly anyway. We confirmed E.ON's view that some MOs are waiting until the end of the 10 day window before sending the MTDs through (and so are not non-compliant, but could send the flows earlier). |

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| | | returning these flows, and therefore they should already be following the Error and Fault Resolution process to rectify it.<br><br>The 'benefit' that Suppliers would only be chasing MOAs for genuinely stuck flows seems flawed. Within current timescales, there is time for some queries and issues to be resolved and the MTD still sent within the required 10 days. If this is reduced to 5 days, there would be less time for MOAs to resolve any issues and still be able to release the MTD within the required timescale.<br><br>Therefore, this could lead to Suppliers chasing MOAs for more, rather than fewer flows, creating additional overheads on both parties.<br><br>**Impact on Organisation's Systems and/or Processes?** Yes<br><br>**Capacity in which Organisation is impacted:** MOA<br><br>**Impact on Organisation:** System and Process changes would be required.<br><br>**Comments:** This would be the timeframe required to develop, test and implement the system changes.<br><br>**Would implementation in the proposed Release have an adverse impact?** If this CP is approved for the June release, the timescale for implementing the change would be very tight, due to other system changes we currently have in development. Our preference (should this be approved) would be for a November Release. | | We agree with Siemens that requiring flows earlier, could mean that more flows are chased by Suppliers, when the MO is already processing the flow manually (e.g. if they need to resolve an issue before sending the flow). E.ON have confirmed that they would rather be aware of these instances earlier, and have more time to chase flows if needed.<br><br>We asked Siemens to confirm the average length of time needed to send a flow where manual intervention is needed, and the percentage of flows this affects. Due to the way Siemens systems are set up they were unable to provide these numbers in the short timescales between the impact assessment being completed and CP1248 being presented to SVG.<br><br>Siemens confirmed that relatively small, though complex systems changes will be needed to effect this change. They confirmed that the June release is not achievable, due to all of the Smart Metering and AMR changes that are going through at the moment. Siemens confirmed that the November 2009 release is achievable, but will be very tight for them. |
| **Association of Meter Operators** | No | **Comments:** This does not appear to be a settlement issue, it is more an Agent Management issue. In the previous consultation, and other fora it is apparent that agents have designed their systems in different ways. If some agents are able to follow the approach described then Supplier's should be able to agree/negotiate SLA timescales with their chosen contracted agents, | | We have called and discussed these comments with the AMO representative. We confirmed that E.ON have considered other ways to make these changes (including |

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| | | recognising the agent system design and business process constraints. | | contractual methods) but believe that there are benefits to Settlement as well as Suppliers, Customers and more generally across the market. Therefore it is appropriate to seek to revise the issue through amending the BSCP. |
| **Gemserv** | Neutral | **-** | No | We have confirmed with Gemserv that there are no impacts on the MRA Product set or end-to-end diagrams. |

Comments on Redline text

No comments received

**Appendix 2 - Detailed Analysis of CP1260 - 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)' and CP1276 - 'Process following the Installation of Small Scale Third Party Generating Plant (Alternative to CP1260)'**

# 1 Introduction – Background

1.1 Section K 1.2.1 of the BSC requires the quantities of Export and Import at any boundary point to be measured separately.

1.2 DCP0030 ('Improving Microgeneration Processes in the Code Subsidiary Documents') was raised as a result of the findings of the BSCP40 issue 002 ('Review of Microgeneration Processes in the Code Subsidiary Documents') group. The Panel asked ELEXON to raise BSCP40 issue 2 when they recommended that the Authority rejected P213 'Facilitating Microgeneration Optional Single MPAN'. BSCP40 issue 2 looked at whether any improvements could be made to the microgeneration processes in the Code Subsidiary Documents (CSDs).

1.3 ELEXON raised CP1260 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)' on 27 August 2008, as one half of the solution presented in DCP0030. The other half was the approved CP1259 'Distributor-Supplier Notification where a Site is Capable of Exporting (microgeneration)'.

1.4 CP1260 was presented to the SVG in November and December 2008, but the SVG could not make a unanimous decision, and the CP was referred to the Panel.

1.5 Before the Panel meeting in January, Npower raised CP1276 'Process following the Installation of Small Scale Third Party Generating Plant (an alternative approach to CP1260 'Meter Investigation Process where a Site is Capable of Exporting (microgeneration)'.

1.6 The Panel requested ELEXON ask participants to compare the 2 changes and provide details of the comparative costs and impacts of each CP. The Panel referred both CP1260 and CP1276 back to the SVG for decision on 3 March 2009.

# 2 Solution CP1260

2.1 CP1260 aims to introduce a single method of communication for Suppliers to inform Meter Operator Agents (MOAs) that microgeneration has been installed at a NHH site.

2.2 It requires the Import Supplier to send a D0001 'Request Metering System Investigation' flow to the MOA, within 10 days of becoming aware that Export could be occurring at the site with the Import meter. The MOA sends back a D0002 'Fault Resolution Report or Request for Decision on Further Action' flow as a result of the inspection, and the D0149 'Notification of Mapping Details' and D0150 'Non Half-hourly Meter Technical Details' flows if they have replaced the Meter.

2.3 Redlining changes would be made to BSCP514 to create a new paragraph 6.3.6 'On the installation of Small Scale Third Party Generating Plant (refer Attachment E).

# 3 Solution CP1276

3.1 CP1276 aims to introduce a single solution, but with the option of an alternative (at the Suppliers discretion) approach to communication for Suppliers to request their MOAs to check the Meter cannot run backwards, providing they have appropriate commercial arrangements in place.

3.2 CP1276 would require the Import Supplier to send a D0142 'Request for Installation or Change to a Metering System Functionality or the Removal of All Meters' flow to the MOA, within 10 days of becoming aware of Export occurring at the site with the Import meter. The MOA sends back a D0002 flow if no action is required (i.e. the meter already has a backstop), or a D0010 'Meter Readings' with initial meter readings, and the D0149 and D0150 flows if the Meter required replacing.

3.3 Redlining changes would be made to BSCP514 to create a new paragraph 6.3.6 'On the installation of Small Scale Third Party Generating Plant (refer Attachment F).

## 4 Differences between the Solutions

4.1 The key difference between CP1260 and CP1276 is the flow to be used by the Supplier. CP1260 requires the Import Supplier to send a D0001 flow to the MOA; and CP1276 requires the Import Supplier to send a D0142 flow to the MOA instead.

4.2 The CP1260 solution requires, in cases where a meter needs replacing, a D0002 flow to be sent with the D0149 and D0150 flows. The CP1276 solution requires the D0002 flow only in situations where the Meter does not need replacing.

4.3 The CP1276 solution recognises a situation where the Supplier and MOA may have 'alternative contractual arrangements' in place for these situations. This would exempt both parties from the need to follow this process. CP1260 proposes a single standard industry process for Supplier's and MOAs to use for the meter investigation process, which would be a mandatory process for all.

4.4 The CP1276 solution also allows Suppliers to take no action if they are aware the metering at the site is correct. CP1260 mandates Suppliers to send the D0001 flow to MOAs when they become aware of microgeneration.

## 5 Participant Impact Assessment

5.1 We issued an addendum to CPC00651 for participant impact assessment on 16 January 2009 to allow CP1260 and CP1276 to be considered beside each other. We received 18 responses, of which, 5 supported the approval of CP1260, 5 supported the approval of CP1276, 2 supported neither solution and 6 were neutral.

5.2 There were a few comments regarding the redlining, which ELEXON recommends be included if one of the CPs were to be approved. A total of 10 comments were received, 7 for CP1276 and 3 for CP1260:

- CP1260 Step 6.3.6.3 should include all the required scenarios, such as the sending of the D0002 and the D0010 upon the replacement of the Meter or the D0010 for initial meter readings, as stated in CP1276 step 6.3.6.4;
- the LDSO and NHHDC should be included as recipients of the D0149 and D0150 flows for the Meter Technical Details in CP1260 and CP1276;
- the order of the steps should be adjusted in CP1276 - with the step involving the MOA being already aware a backstop is in place moved to follow step 6.3.6.2; and
- clarification should be added to footnote 2 to ensure the Supplier informs the customer of microgeneration.

 

5.3 Affirmative comments for CP1260 included:

- it is the flow most likely to be used by Suppliers when in this situation;
- less system impacts for MOAs;
- it utilises existing systems; and
- it offers the industry a single solution.

5.4 Disapproving comments for CP1260 included:

- it is not appropriate for the D0001 to be mandated for use;
- it does not account for the case of a site visit rejection; and
- it does not provide a flexible solution or allow for alternative contractual arrangements.

5.5 Affirmative comments for CP1276 included:

- ability to provide a more appropriate course of action;
- it allows a more flexible approach; and
- if there was to be a method which allowed Suppliers to check the backstop status of the meter first, the D0142 would be the more appropriate flow and it is the simpler and more robust solution.

5.6 Disapproving comments for CP1276 included:

- a query as to how a Supplier would be aware of whether a meter needs replacing without first asking for an investigation;
- that there is clear evidence the meters would not need replacing in all situations;
- if the objective of CP1260 was to create a uniform industry process then CP1276 does not do this; and
- there is a risk the meter will be replaced unnecessarily.

5.7 Views for neither solution included both that one flow should be selected to ensure a single solution, and the opposing view that a single solution would require one of the flows used in a way they are not intended for.

5.8 One industry member would like to be certain the Suppliers will do something with the information the LDSO sent as required by CP1259.

5.9 A difference in cost between the solutions could not be determined from industry Impact Assessment. One participant only provided numbers, advising each change would cost £8,000 for process changes, and CP1276 would cost an extra £20,000 for relevant system changes. There is not enough data to draw conclusions from and it appears all figures provided would be subjective. Maximum timescales for implementation indicated CP1260 could be implemented in 180 days (3 respondents), which would target the November 2009 Release, and CP1276 could be implemented in 270 days to one year (1 respondent), which would target the February 2010 Release. The shortest timeframe provided by any Supplier for either CP was 180 days.

5.10 We have split the industry Impact Assessment responses between three tables. Table 1 contains a summary of the impact assessment responses, table 2 contains the full responses, and table 3 contains comments on the redlined text. We have included our comments/responses in the final column in tables 2 and 3.

## 6 Assessment of Current Backstop Situation

6.1 We issued a request to MOAs through the Association of Meter Operators to ascertain the likelihood of a situation when microgeneration is occurring at a site and the meter already has a backstop or cannot run backwards.

 

6.2 Feedback from ELEXON metering experts infers no static (electronic) meter would run backwards unless it has been programmed to, which is unlikely. Electro-mechanical Meters will not run backwards if a backstop has been fitted.

6.3 From 1984, the Electricity Association required all Meters purchased to have a backstop. If this is the case, only meters pre-1984 could potentially run backwards.

6.4 Feedback from the industry regarding the percentage of meters that would need replacing in this situation ranged from 6% to 35%. One large company, who is responsible for approximately one fifth of meters in Britain, believed the percentage that would need replacing to be around 14%. Another large company, who is also responsible for approximately one fifth of meters in Britain, believed their percentage that would need replacing to be around 6%. Another company believed they have approximately 35% of meters currently in use were purchased pre-1984.

6.5 Feedback from one MOA was it would be impossible to be 100% sure whether a Meter could run backwards without going to the site, and even then there could be situations where a technician couldn't tell from looking at the meter.

6.6 Attachment G is a survey which Ofgem carried out of meter manufacturers in 2003. Question 1 asked 'What impact does reverse flow have on the meter's register?' and 6 of 8 respondents replied there would be no effect.

6.7 An industry member made a comment regarding the production of a list which Suppliers can check to determine whether a backstop would be present for that type of meter and year. ELEXON are currently in negotiation with Ofgem and BEAMA to help create this.

# 7 Conclusions

7.1 The industry is evenly split in its preference for CP1260 and CP1276; however the majority of industry member would prefer no solution than the alternative to their choice. MOAs would prefer a single solution.

7.2 Section 6 'Assessment of Current Backstop situation' concludes there is a 6% - 35% chance that a meter will need replacing as a result of Small Scale Third Party Generation. Therefore, it would appear that the D0142 flow is not the correct flow to use for a single solution.

7.3 The purpose of BSCPs is to provide a detailed set of processes which industry members are required to follow. This is consistent with the CSD Architecture Principles Document agreed by the Panel in 2007. Creating a process where a BSC Party can either follow it or use their own 'commercial contractual arrangements' defeats the purpose of a BSC Procedure, and would be inconsistent with the APD.

7.4 There are very few sites which have microgeneration installed (estimated at 4,000), although this is likely to grow. There is also the electronic meter roll-out, which is due to occur over the next five to ten years, making this issue irrelevant if all meters will be replaced. Therefore, we believe that the cost to BSC Parties of implementing either solution out-weighs the benefit and regularity of a single solution.

7.5 The current industry baseline allows Suppliers to select the flow which is best fit for the circumstances, (i.e. if they are aware a backstop is on site, do nothing, if they are aware a backstop is not on site, send the D0142 flow, and if they are uncertain, send the D0001 flow).

 

7.6 There is still a BSC obligation on Suppliers to ensure correct metering is installed at the site, regardless of the process.

# 8 Recommendations

8.1 ELEXON's recommendations, based upon the above sections, is to:

a. agree that a single mandatory solution is not workable;
b. note MOAs would prefer a single solution;
c. reject CP1276 based on the D0142 flow not being the suitable flow for the likelihood of the need to have a meter replaced and because referring to 'commercial contractual arrangements' is inappropriate; and
d. reject CP1260 based on the inability to gain a unanimous decision, the cost out-weighing the benefit and the industry's majority preference for neither solution than the alternative to their choice;
e. If you approve either CP, agree our suggested amendments to the redlining for CP1260 or CP1276 and agree that either CP1260 should be implemented in November 2009 or that CP1276 should be implemented in February 2010.

**IA Summary for CP1260 and CP1276**

| Organisation | Capacity in which Organisation operates in | Agree? | Days Required to Implement |
|---|---|---|---|
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | CP1260 | 180 days |
| E.ON UK Energy Services Limited | Party Agent NHHDC /DA MOA | CP1260 | - |
| Association of Meter Operators | Trade Association for Meter Operators | CP1260 | - |
| British Energy | Supplier | CP1260 | - |
| AccuRead | NHHDC, NHHDA, NHHMOP, HHMOP | CP1260 | 90 |
| Scottish and Southern Energy | Supplier/Generator/ Trader / Party Agent / Distributor | CP1276 | We anticipate 9 months to make the changes and to fit in with our IT plans |
| Siemens Metering Services | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO) | CP1276 | 90 days |
| Npower | Supplier, Party Agent | CP1276 | November 2009 implementation |
| IMServ Europe Ltd | HHDC, MOA | CP1276 | 90 |
| TMA Data Management Ltd | HHDC, HHDA, NHHDC and NHHDA | CP1276 | 60 |
| EDF Energy | Supplier, NHH Agent and HH MOP | No | CP1260 – 90 days<br>CP1276 – 270 to 360 days |
| E.ON | Supplier – NORW, EMEB, EELC, PGEN, EENG | Neither | 182 days |
| Western Power Distribution | LDSO | Neutral | - |
| Electricity North West Ltd | LDSO | Neutral | - |
| Gemserv | MRASCo Ltd | Neutral | - |
| CE Electric UK | LDSO, UMSO | Neutral | - |
| Electricity North West Ltd | LDSO | Neutral | - |
| Independent Power Networks | LDSO, UMSO, SMRA | Neutral | - |

Impact Assessment Responses

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| Western Power Distribution | Neutral | **Comments:** We are neutral as to which CP is approved but one of them needs to be implemented or CP1259, which obliges the LDSO to inform the Supplier following installation of generation, needs to be cancelled. We don't want to incur costs implementing CP1259 if the Supplier doesn't do anything when they get the information from us. | | CP1260 | We discussed the proposal of withdrawing both CPs (1260 and 1276) with the respondent. The respondent questioned why the SVG went ahead and approved CP1259 (placing a single solution obligation on the LDSOs) when not approving CP1260. We confirmed that Suppliers would still have the obligation under the Code and would still be required to take appropriate action, regardless of whether or not the CPs are approved.<br><br>Respondent is not happy with the solution and is considering raising this as an issue at the SVG or the Panel.<br><br>ELEXON believes CP1259 is necessary as there is still an obligation on Suppliers to use the information when they receive it. |
| | | **Impacts:** | | | |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| Scottish and Southern Energy | CP1276 | **Comments:** None | **Comments:** We believe that this solution is a more efficient and a simpler one. It has no impact on our systems and processes and will allow us to meet the June 2009 release. It also allows for flexibility for Suppliers/Meter Operators agents to maintain contractual arrangements. | CP1276 | We have confirmed with SSE that they are happy with our recommendation to reject both Change Proposals. |
| | | **Impact on Systems:** Systems and Processes | **Impact on Systems:** None | | |
| | | **Capacity:** Supplier and Mop | **Capacity:** No impact on any part of our business. | | |
| | | **Impact on Organisation:** Changes to systems. Amendments to internal processes to accommodate the changes. | **Impact on Organisation:** None | | |
| | | **Cost:** We anticipate significant costs to implement this change. | **Cost:** None | | |
| | | **Other:** This option does not allow Suppliers to have an alternative contractual arrangement, in place with the MOA. The diagram (App A) for the CP1260 does not show what happens in case of a rejection of site visit on receipt of D0001? As in our previous response, we do not believe that D0001 is the correct flow to use. | **Other:** CP1276 process is robust, complete and consistent with BSCP514 compared to CP1260. The diagram (App A) does not make sense. It has been over simplified making the CP1276 solution appear more complicated, when in fact it is the simpler and robust option.<br>A D0142 flow is a request for suitable metering. Following the site visit, a D0002 if meter installed is suitable or a D0149/D0150 if new meter fitted. Not both flows. | | |
| EDF Energy | Neither | **Comments:** We support neither of these changes in their current forms. We would support CP1276 if process to initiate MOP work was a D0001 and not a D0142. We do not support any change that requires re-working processing of a D0142 as this is most expensive method to implement. Processes we currently have for dealing with D0001s | | CP1260 and CP1276 | We have confirmed with EDF that they are happy with our recommendation to reject both Change Proposals. |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | can be managed without system changes, although as a Supplier we might want to make these eventually. | | | |
| | | **Impact on systems:** no comment | **Impact on systems:** no comment | | |
| | | **Capacity:** Supplier and MOP | **Capacity:** Supplier and MOP | | |
| | | **Impact on organisation:** For Supplier process, with possible later system changes to manage D0001 from LDSO automatically. For MOP new D0001 monitoring process to deal with requests with SVCC for possible backstop issues. | **Impact on organisation**: System and process changes for MOP processing of D0142. There seems to be no method of identifying those D0142s that are related to this new process so all D0142 processing is impacted. Process changes required for Supplier, with later system changes to convert D0001 from LDSO to relevant D0142. | | |
| | | **Cost:** Work for process changes estimated at £8,000. | **Cost:** Work for process changes estimated at £8,000 and MOP system changes at £20,000. | | |
| ScottishPower | CP1260 | **Comments:** ScottishPower sees no advantage of using CP1276 over CP1260 as the CP currently stands.<br><br>At this time it is difficult to quantity the number of meters in situ which do not have a backstop fitted. As things currently stand ScottishPower does not feel that Suppliers can accurately assess whether a backstop is fitted and as such the MOA should be contacted in all instances (this mirrors the CP1260 solution). However ScottishPower believes that there is a simpler solution to resolve the issue.<br><br>ScottishPower believes there is a strong case for meter manufacturers to be obliged to publish lists of all their meters to clearly indicate which have backstops and which do not (it may be simpler to list which ones do with the assumption that if a meter is not on the list it will not have a backstop fitted).<br><br>This should be published on an industry website such as Elexon or similar. If this was to be the case then ScottishPower would be minded to look more favourably upon CP1276. It is clear that if the Supplier could reference such a list then the D0142 would be the most appropriate flow to send as a Supplier would only contact the MOA when a | | CP1260 and CP1276 | ELEXON agrees with the idea of a list. We are currently in discussion with BEAMA to determine the amount of work and also Ofgem to see if its possible to make an adjustment to the list which is currently available on the Ofgem website.<br><br>ELEXON explained the solution of rejecting both proposals to SAIC, SAIC are happy with the decision to reject both change proposals. They believe the cost of |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | meter replacement was required and as such the D0001 would not be appropriate. | | | updating systems (for the industry) to support one of the solution would far outweigh the need for this process. We agreed that a mitigating factor is that no new metering is to be without backstops and all metering is to be replaced with electronic equipment within the next 5 to 10 years. |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | **Impact on systems:** Systems & Processes | | | |
| | | **Capacity:** Supplier, MOA | | | |
| | | **Impact on organisation:** ScottishPower does not anticipate there being a difference between the two solutions. Both will require manual intervention thus the creation of new internal processes along with system impacts. | | | |
| | | **Cost:** As stated above the costs would be similar for both solutions. ScottishPower do not as yet have full costs for either solution though we would expect there to be system impacts and more importantly internal process changes going forward as both solutions would involve manual intervention. | | | |
| Electricity North West Ltd | Neutral | **Comments:** None | | Neutral | ELEXON agrees with the suggestion that the LDSO should be included in the data flows – see the redline text comments table for more details of our suggested changes.<br><br>ELEXON explained the proposal to reject both CPs, and Electricity Northwest were happy with this outcome, providing in situations where meters are replaced LDSO are recipients of the required data-flows for new meters, in accordance with BSCP514 6.3.3 and 6.3.4 |
| | | **Impact on systems:** Yes | | | |
| | | **Impact on organisation:** LDSO's have been omitted from the process see comments below | | | |
| | | **Other comment:** LDSOs have been missed out of the process. The Meter operator should also send LDSOs initial and final meter readings and Meter Technical Detail data flows | | | |
| E.ON UK Energy Services Limited | CP1260 | **Impact on system:** Minimal as this would trigger an investigation as does the receipt of any other D0001 flow | **Impact on system:** Significant changes would be required to ensure that unnecessary meter exchanges did not take place. | CP1260 | We discussed these comments with E.ON ES and explained the preferred solution to reject both Change |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | **Capacity:** MOA | | | Proposals.<br><br>The respondent is concerned with the possibility of Suppliers doing as they wish and Meter Operators uncertain of how they are to be informed.<br><br>Also, the only way to be certain a given meter has a backstop is to go out and look, you cannot be 100% sure. We confirmed that we will highlight this view to the SVG.<br><br>We also noted that not implementing either CP will allow Suppliers the flexibility to use the right flow for each circumstance. If they are aware a backstop is on site, do nothing; if they are aware one isn't, send the D0142; if they are uncertain, send the D0001, which should happen in any situation. There is also a vested interest for the Supplier to sort this situation out. |
| | | **Impact on organisation:** Some procedural updates would be required | **Impact on organisation:** Extensive alterations to existing procedures would be required with the associated training and rollout requirements | | |
| | | **Other Comments:** This is our preferred solution of the two proposals as it utilises existing consistent systems | **Other Comments:** We would not support this solution for the following reasons:<br><br>It proposes initiating a meter investigation using a flow designed to instruct a MOA to install or remove metering thus giving rise potential confusion whilst at the same time an established procedure exists for initiating an investigation namely the D0001 flow.<br><br>There is a significant risk that an meter will be unnecessarily replaced with the resultant additional costs only to need replacing again as a result of industry changes within a relatively short period of time.<br><br>It allows suppliers to establish independent arrangements with MOAs whilst this approach may be valuable where a MOA has a relationship with a single supplier where an MOA has relationships with multiple suppliers the potential exists that a MOA would need to support multiple parallel solutions with the resultant potential for confusion. | | |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| E.ON | Neither | **Comments:** We do not support the introduction of either of these CPs and are planning to raise an new alternative CP. | | Yes | We discussed the change with the respondent. The respondent is happy not to raise a further CP providing both the changes are rejected. Initial industry feedback suggests their new CP would not offer a solution to satisfy all industry members, but this would be raised if the SVG cannot unanimously agree to reject Change Proposals. |
| | | **Impact on systems:** Yes. Our system will have to identify the site visit check code and we will have to either build a process to send the D0001 automatically to the appointed MOP, or we will have to manually investigate the flow and manually generate the necessary D0001. We will then have to monitor the response and track if the meter is being changed. | **Impact on systems:** Again, we will have to receive the D0001 and using the site visit check code, arrange to contact the customer to advise them of the impending meter exchange. Once on site we may find the meter does not require changing and so this will have to be explained to the customer. We will have to have an alternative process for sites where the meter doesn't need changing as the expected response to a D142 are meter exchange flows or abortive visit information. | | |
| | | **Impact on organisation:** This will impact the processing of the D0001 inbound and outbound as well as the processes for monitoring responses and updating meter exchanges. | **Impact on organisation:** This will impact the inbound processing of the D0001 and will require new processes to be used for the D0142 to deal with instances where the meter does not require changing.<br><br>Alternatively if as we believe the D142 is the wrong flow and wish to put in commercial arrangements this will impact all of our metering contracts for the business | | |
| | | **Cost:** The system changes associated with this solution are less expensive since we will make changes for CP1259 to the flow and since we currently manage the receipt and responses of the D0001 and D0002, the only cost will be processing changes, however there is manual | **Cost:** Since commercial contracts would have to be negotiated and would remain confidential we cannot provide them at this time. However, we do believe that as well as unnecessary meter exchanges being requested there will be a percentage of abortive visit costs where access has not | | |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | intervention and minor system changes required which cannot quantified due to the lack of information currently available on the likely ramp up of the installation of microgeneration. | been granted to change the meter – further inflating the cost of this solution | | |
| | | **Other comment:** We believe this CP is not better than the current baseline and should be withdrawn | | | |
| | | **Additional comments on email:** Please find additional comments below for CP1276:<br>The Distributed Generation Co-ordinating Group carried out research on the likely replacement of meters without backstops in the event that microgeneration was installed. This research concluded that meters only need to be replaced where the meter is mechanical and it is not clear whether a backstop has already been fitted or is incorporated in the meter. It is inaccurate to suggest that meters will need changing on every occasion that a suppliers is made aware of the presence of micro-generating equipment (we believe this is more reasonably 36% of the time) and therefore it is unnecessary to request the MOP to change the meter on every single occasion; this solution will burden suppliers and customers with gratuitous costs.<br>Currently the industry baseline allows suppliers to choose how to ensure they have appropriate metering on site and doesn't prescribe the use of any D-flow to carry out this validation. This allows the supplier to choose which process to adopt – the use of the D0001, the D0142, the telephone, email, letter or fax.<br>Since one of the original rationales for CP1260 was to create a uniform industry process, it is unclear how CP1276 facilitates this and in fact it is becoming clearer from the inability of the industry to agree on a common solution that this is not really what the industry wants and to that end CP1276 allows parties to enter into commercial arrangements in preference to the use of a mandated D flow, whilst restricting the use of D-flows to the D142.<br>This is effectively allowing an opt out from the single industry process where contracts allow, but prescribing that a true investigative D-flow is not used to investigate a metering system, but requires parties to request that a meter is changed even when in 64% of occasions it may not need changing at all.<br>If you apply the applicable objective test to this change proposal it is difficult to argue | | | |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | that a proposal that is supposed to create a single solution for the industry that permits an opt out that is open to parties to determine how to implement the change promotes efficiency in the implementation and administration of the Balancing & Settlement arrangements. | | | |
| Siemens Metering Services | CP1276 | **Comments:** Siemens Metering Services strongly prefers CP1276 to CP1260. We still feel that the D1 is the incorrect flow to use in the circumstances described in CP1260.<br>We believe that CP1276 offers a more flexible approach to both Suppliers and Party Agents, and builds on processes already in place. | | CP1260 | We discussed our recommendation to reject both CPs, and Siemens were comfortable with this approach. |
| | | **Impact on systems:** Process impact | **Impact on systems:** Minimal process impact | | |
| | | **Impact on organisation:** Large process changes would be required | **Impact on organisation:** No changes required | | |
| | | **Cost:** Potential costs of up to £2,000 pa, due to additional office admin around processing of D0001 flows. | **Cost:** n/a | | |
| Npower | CP1276 | **Comments:** We rejected CP1260 previously because we did not think it was appropriate to mandate Suppliers to use the D0001. We feel that there are circumstances where we would need to adopt a more flexible approach. If we | **Comments:** We feel CP1276 provides a process that enables Suppliers to adopt a more flexible approach and allows them to take the most appropriate course of action dependent on the information they have received from the LDSO/customer about | Yes | We have discussed these comments with Npower and they are happy with both Change Proposals being rejected. |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| | | have information that indicates the meter is running backwards/requires a backstop then we feel it would be more appropriate to send a D0142. Conversely, if we have information that indicates the meter already has a backstop/is not running backwards we do not want to be mandated to use a D0001 to carry out an investigation. | the meter. | | |
| | | **Impact on systems:** There will be impact on processes | | | |
| | | **Impact on organisation:** Mandating the use of the D0001 would not require any system changes because we already send D0001's. However we do not believe it is the correct use of the D0001 flow. | **Impact on organisation:** As the D0142 is an existing flow we do not envisage any system changes. CP1276 enables Suppliers to take the most appropriate course of action. | | |
| | | **Cost:** We do not envisage any system change costs because we currently send D0001's however we are concerned there could be increases in MOA costs because we may incur additional costs for unnecessary site visits. | **Cost:** We do not envisage any system change costs because we currently send D0142's.<br>We believe that a more flexible process would ensure Suppliers can take action dependent on the information they have about the metering on site rather than having to carry out an investigation/send a D0001. | | |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| Association of Meter Operators | CP1260 | **Comments:** This depends on the proportion of meters that actually need changing. As lack of backstops is believed to only an issue for meters dated (manufactured) prior to 1984 the proportion of meters in use is declining. When a smart meter role out commences they will all be removed. Doing the D0001 check first gives the opportunity for MO to respond, prior to changing a meter for no purpose. I would expect Meter Operators to be able to tell the Supplier/Distributor that there is no value in asking for meters where the serial number indicates they are newer than 1984. This should substantially reduce the number of Supplier requests. I would propose that a step should be introduced to require the Supplier to filter any requests prior to asking the MO. | | - | We have discussed the comments with the AMO and they believe the rejection of both CPs is the logical option. |
| British Energy | CP1260 | BE view is a solution is required by the industry, and if so the best solution would be CP1260<br><br>A Guidance document to be required if no solution was reached in the best way to deal with the situation. | Without an initial MOP investigation we would question how a supplier would identify if a backstop exists. Also a D0142 could be taken as an instruction to install new metering regardless of whether it is required. | Yes - Processes | We have discussed the concerns raised by British Energy.<br><br>ELEXON explained the solution to the respondent, who is happy with the solution to reject both Change Proposals.<br><br>ELEXON advised on the issue of guidance we would not be recommending this as an option to the SVG due to likely disagreement on the content of such guidance, similar to the disagreement on the selection of either CP1260 or CP1276 as a viable solution for this issue. |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| AccuRead | CP1260 | 8.2 **Capacity in which Organisation is impacted** NHHMO<br><br>**Impact on Organisation**: This change would require us to amend our NHHMO software in order to receive and respond correctly to the D0001 coming from the supplier using this process. | **Comments:** The change is too generic and does not address the issue. The CP needs at least to include a solution for what needs to happen and what flows would need to be exchanged in the result of a site visit where it is concluded that no change to the meter is necessary.<br><br>It might also be worth noting that the third bullet point in the 'Proposed Solution' does not indicate that the NHHDC needs the MTD and that the read would be validated first in the usual fashion and not as indicated, sent directly to the Import supplier. | Both | We spoke to Accuread, who are happy with the proposed solution to reject both Change Proposals. |
| Independent Power Networks Ltd | Neutral | **Comments:** We are neutral to either the implementation of 1276 or 1260. In either case we will be required to send a D0001 and it is the consequential process that differs between the two proposals. | No | | We spoke IPNL, who are happy with the proposed solution to reject both Change Proposals. |
| CE Electric UK | Neutral | **Comments:** CE are neutral on this, however we feel that one of the solutions should be implemented based on the fact that we are in the process of implementing work arounds to facilitate CP1259 which would be deemed a pointless act if there was no follow up. | No | No | We spoke to CE Electric, who as stated would prefer a single solution but is happy with the proposed solution to reject both Change Proposals.<br><br>There is still a BSC obligation on the Supplier to inform the MOA of microgeneration, and this is not possible without advice from the LDSO, therefore ELEXON believes CP1259 is not a pointless act. |

| Organisation | Agree? | CP1260 Comments | CP1276 Comments | Impacted? | BSCCo Response |
|---|---|---|---|---|---|
| TMA Data Management Ltd | Neutral | **Capacity in which Organisation is impacted -** NHHDC<br>**Impact on Organisation:** Processes | Yes | Neutral | We spoke to TMA, who are happy with the proposed solution to reject both Change Proposals. |

Comments on Redline text – CP1276

| No | Organisation | Doc. name | Location | Severity Code | Comments | ELEXON Recommendation |
|---|---|---|---|---|---|---|
| 1 | Scottish Power | CP1276 | 6.3.6.5 | M | This stage should precede step 6.3.6.3 as it would be the first step that an MOA would take. Only after this check had been made and if the meter is found not to have a backstop would a meter replacement take place. | We recommend that step 6.3.6.5 is moved to before step 3.3.6.3 and that the numbering is updated to reflect the change. |
| 2 | Scottish Power | CP1276 | Pp 1, footnote 2 | L | The Customer should inform the LDSO that they have installed apparatus capable of generation on the LDSO's network. Therefore ScottishPower believes that the Supplier should in this instance also inform the LDSO that they have received such notification from the Customer or direct the customer to the LDSO in the first instance. | Think this is a significant change and out of scope of the proposal.<br>Have spoken to customer and advised to raise a CP if they would like this process to be mandatory. |
| 3 | Scottish Power | CP1276 | Pp1, Footnote 4 | M | The phrase "take appropriate action" is not sufficiently succinct and is left open to interpretation | We disagree with this change to the redlining as it conflicts with the aims of CP1276. |
| 4 | Electricity North West Ltd | CP1276 | 6.3.6.4 | L | LDSO" missing from the words in the 3rd box in Redline Changes | We agree that it would be beneficial for the LDSO and NHHDC to receive the D0149 and D0150. (See comment 7 as well).<br>We recommend that the words 'LDSO and NHHDC' are added to the 'to' column of 6.3.6.4 next to the D0149 and D0150. |

| | | | | | | |
|---|---|---|---|---|---|---|
| 5 | Electricity North West Ltd | CP1276 | proposed solution | | LDSO" missing from the words bullet point 3 in the Proposed Solution in the CP1276 document | We agree that the LDSO should be included in the bullet point, this change is to be reflected in the redlined suggestions in point 4 above. |
| 6 | Npower | CP1276 | BSCP 514 (6.3.6.4) Action box 2nd Paragraph | M | The redlining in the 'Action' box states that the MOA should send a D0010 (initial Meter register reading for replacement Metering system) to the NHHDC, Supplier and LDSO.<br>The DTC states the instances of the D0010 from MOA to Supplier and MOA to Distributor should only be used when the meter is HH and the reading is either initial and/or final. Supplier and LDSO should be deleted as the MOA should only be sending the D0010 to the NHHDC. | We agree, it should be the D0149 'Notification of Mapping details' and D0150 'Non Half-hourly Meter Technical Details' that are sent to the LDSO and Supplier and the D0010 should only be sent to the NHHDC.<br>We recommend that 'LDSO and Supplier' are removed from the 'to' column of 6.3.6.4. |
| 7 | Npower | CP1276 | BSCP 514 (6.3.6.4) Action box 3rd Paragraph | M | The redlining in the 'Action' box states that the MOA should 'provide the new Meter details to the Supplier'.<br>This should read 'Provide the new Meter Technical Details' and the 'To' box which currently lists Supplier should also include NHHDC and LDSO. | We agree that it would be beneficial for the LDSO and NHHDC to receive the D0149 and D0150. (See comment 4 as well).<br>We recommend that the words 'LDSO and NHHDC' are added to the 'to' column of 6.3.6.4 next to the D0149 and D0150. |

Comments on Redline text – CP1260

| No | Organisation | Doc. name | Location | Severity Code | Comments | ELEXON Recommendation |
|---|---|---|---|---|---|---|
| 1 | Scottish Power | CP1260 | | M | It may improve the process defined for CP1260 to include step 6.3.6.4 from CP1276 where the meter is replaced. | We agree that it would be beneficial to make this change.<br>We recommend that:<br>• paragraphs 'Send final Meter register reading for replaced Metering System or notification that Meter register reading not obtainable' and 'Send initial Meter |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | register reading for replacement Metering system' are inserted into the 'ACTION' column of step 6.3.6.3<br>• The NHHDC is included as the recipient in the 'TO' column for both actions<br>• Flows D0010 and D0002 are included in the 'INFORMATION REQUIRED' column for the first action, and flow D0010 for the second action |
| 2 | Npower | CP1260 | BSCP514 (6.3.6.3) | M | A new step is required. If there has been a meter change the Meter Technical Details should be sent to the NHHDC and the LDSO in addition to the Supplier. | We agree that it would be beneficial for the LDSO and NHHDC to receive the D0149 and D0150. (See comments 4 and 7 as well).<br>We recommend that the words 'LDSO and NHHDC' are added to the 'to' column of 6.3.6.3 next to the D0149 and D0150. |
| 3 | Npower | CP1260 | BSCP (6.3.6.3) | M | A new step is required. If there has been a meter change then the MOA should send the NHHDC a final register reading for the old meter and an initial register reading for the new meter. | We agree that it would be beneficial to make this change.<br>We recommend that:<br>• paragraphs 'Send final Meter register reading for replaced Metering System or notification that Meter register reading not obtainable' and 'Send initial Meter register reading for replacement Metering system' are inserted into the 'ACTION' column of step 6.3.6.3<br>• The NHHDC is included as the recipient in the 'TO' column for both actions<br>• Flows D0010 and D0002 are included in the 'INFORMATION REQUIRED' column for the first action, and flow D0010 for the second action |

**Appendix 3 - Detailed Analysis of CP1265 - Technical Assurance Documentation Changes Following Review**

# 1 Introduction

1.1 ELEXON raised CP1265 'Technical Assurance Documentation Changes Following Review' on 27 November 2008.

1.2 In April 2007 the contract for the role of Technical Assurance Agent (TAA) was awarded to C & C Group Holdings Ltd ('C & C Group'); previously this role was performed by Logica. ELEXON reviewed the TAA related documents and identified changes required to reflect that C & C Group now provides the TAA service and to ensure current TAA activities and obligations are accurately documented.

# 2 CP1265 Solution

2.1 CP1265 proposes changes to the following documents:

- TAA SVA Service Description;
- TAA CVA Service Description;
- BSCP27 'Technical Assurance of Half Hourly Metering Systems for Settlement Purposes';
- BSCP535 'Technical Assurance';
- CVA Data Catalogue and CVA Data Catalogue Annex A ; and
- NETA Interface Definition and Design (IDD) Parts 1 and 2.

2.2 The proposed redlined document changes (as issued for Impact Assessment) are available in attachments A to H.

2.3 Some minor consequential changes will be required to the CDCA URS and CRA URS due to the changes proposed to the IDD. These changes are not provided as redlined attachments (they relate to Category 2 Configurable items).

# 3 Impact on Service Providers

3.1 Logica has drafted the necessary IDD and URS changes and would need to implement these changes. The estimated Logica implementation cost is £870.

3.2 There is no impact on C & C Group.

# 4 Impact on ELEXON

4.1 Approximately 4.5 days ELEXON effort would be required to implement the document changes required by CP1265. This equates to an estimated implementation cost of £990. There would be no ongoing ELEXON operational costs as a result of CP1265.

# 5 Participant Impact Assessment

5.1 CP1265 was issued for participant impact assessment on Thursday 27 November 2008 as part of CPC00650. 13 responses were received of which, 10 agreed and 3 were neutral (no respondents disagreed with the proposed changes).

5.2 No respondents identified any impacts except document-only changes. No respondents identified any required lead-time for implementation of CP1265. No process or system impacts were identified by respondents.

5.3 One respondent noted BSCP27 refers to Performance Assurance Parties, and this seems to suggest LDSOs may be responsible for rectification. Following discussion the respondent agreed that this issue does not impact CP1265. ELEXON is taking separately action to clarify and address the query. There is no impact on CP1265 due to this comment.

5.4 Another respondent identified some minor typographical errors in the CP1265 redlining for the SVA and CVA TAA Service Descriptions. ELEXON recommends that the SVG approve minor changes to rectify these errors. Details of the suggested changes are included in the 'comments on redline text' table below.

## 6 Recommendation

6.1 ELEXON's recommendation, based upon the justification stated in the CP1265 form (consistency between TAA-related documents, the Code and the TAA service; consistency in Logica services, systems and guidance documentation; optimised effectiveness of TAA documents) and the agreement of CP1265 by impact assessment respondents, is to:

a. Agree the proposed minor amendments to the redline text changes for the SVA TAA Service Description and CVA TAA Service Description
b. Agree that 'reasonable' should be kept and not replaced with 'best' in BSCP27 paragraph 1.13; and
c. Approve CP1265 for inclusion in the June 2009 Systems Release.

 

**IA Summary for CP1265 - Technical Assurance Documentation Changes Following Review**

| IA History CPC number | CPC00650 | Impacts | TAA SVA Service Description; TAA CVA Service Description; BSCP27; BSCP535; CVA Data Catalogue ; CVA Data Catalogue Annex A ; NETA Interface Definition and Design (IDD) Parts 1 and 2; CDCA URS; and CRA URS. |
|---|---|---|---|

| Organisation | Capacity which Organisation operates in | Agreement (✓/X) | Days Required to Implement |
|---|---|---|---|
| **EDF Energy** | **Supplier, NHH Agent and HH MOP** | Yes | 0 |
| **Scottish Power** | **Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA** | Yes | 0 |
| **NPower Limited** | **Supplier, Supplier Agents** | Yes | - |
| **TMA Data Management Ltd** | **HHDC, HHDA and NHHDA** | Yes | - |
| **Scottish and Southern Energy** | **Supplier/Generator/ Trader / Party Agent / Distributor** | Yes | - |
| **E.ON UK Energy Services Limited** | **NHHDC-DA NHHMO HHMO** | Yes | - |
| **Western Power Distribution** | **Distributor & MOA** | Yes | - |
| **E.ON** | **Supplier** | Yes | - |
| **Electricity North West Ltd** | **LDSO** | Yes | 0 |
| **British Energy** | **Supplier; Generator; Trader; CVA MOA** | Yes | - |
| **AccuRead** | **NHHDC / NHHDA / NHHNOA / HHMOA** | Neutral | |
| **CE ELECTRIC** | **LDSO, UMSO** | Neutral | - |
| **Independent Power Networks Limited** | **LDSO, UMSO, SMRA** | Neutral | - |

Impact Assessment Responses

| Organisation | Agree (✓/X) | Comments | Impact (✓/X) | BSSCo Response |
|---|---|---|---|---|
| Scottish Power | Yes | **Impact**: Documentation Changes Only | Yes | Noted – no action required. |
| TMA Data Management Ltd | Yes | **Comments:** There is no impact on TMA's systems or procedures as the changes proposed reflect the existing processes in place, introduced by the new TAA agent C&C in 2007. | - | Noted – no action required. |
| E.ON UK Energy Services Limited | Yes | **Comments**: The changes identified will not have a significant impact on our activities as the changes reflect current practice. | No | Noted – no action required. |

| | | | | |
|---|---|---|---|---|
| Electricity North West Ltd | Yes | **Impact:** Housekeeping Change – no direct impact on Systems and Processes<br>**Implementation:** No system and process impacts | No | Noted – no action required. |

Comments on Redline text

| No. | Organisation | Document | Location | Comments | ELEXON Recommendation |
|---|---|---|---|---|---|
| 1 | NPower Limited | Attachment A | Section 1.15 3.1.4 | BSCP27 now references Performance Assurance Parties and seems to suggest that the LDSO may be responsible for some of the rectification - is this the case, how will this work in practice, and will it now be possible for the TAA to raise a NC against a LDSO? | Discussed this comment with the respondent and agreed that this does not impact CP1265. Action taken to clarify and address the query separately.<br>No action required for CP1265. |
| 2 | TMA Data Management Ltd | SVA TAA Service Description | 3.1.4 | Replace **notificationd** by notification | Agree – propose that 5th bullet point amended to 'Reminder notification to Parties'. |
| 3 | TMA Data Management Ltd | CVA TAA Service Description | 3.1.5 | Replace **notificationd** by notification | Agree – propose that 5th bullet point amended to 'Reminder notification to Parties'. |

**Appendix 4 - Detailed Analysis of CP1266 - Updates and Refinements to BSCP504**

# 1 Introduction

1.1 We raised CP1266 ('Updates and Refinements to BSCP504') in order to address issues/inconsistencies within BSCP504 ('Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS). Addressing these issues will create consistency between the BSCP504, BSCP508 and the MRA Data Transfer Catalogue.

1.2 The above issues are detailed in points A – D below:

A. Within **Section 3.1.2. (Process Daily Coefficients received from SVAA)** a reference to the D0039 (Daily Coefficient File) form has been omitted from **section 3.1.2.2.** It is important that this be included as the Supplier Volume Allocation Agent (SVAA) is required to supply the Non Half Hourly Data Collector (NHHDC) with this flow.

B. Within **Section 3.2.3.9 (Change of NHHDC for an existing SVA Metering System not concurrent with a Change of Supplier)** the reference to Associated MOA is incorrect and should refer to the New NHHDC. Section 3.2.3.9 relates to an instance where the Old NHHDC receives additional information after historical information has already been forwarded to the New NHHDC.

C. It has been noted that the wording within **Section 3.3.1.4 (Coincident Change of Supplier and Measurement Class from a Non-Half Hourly to a Half Hourly SVA Metering System)** can lead to confusion as it calls for the output of the D0086 (Notification of Change of Supplier Readings) "8 days after the Supplier Start Date" (SSD+8) and "in time for Final Reconciliation Volume Allocation Run". This is not actually possible as the D0019 (Metering System EAC/AA Data) cannot be produced till a minimum of 8 days after the Settlement date for the Change of Supplier (CoS) read. This may have been up to 5 days after the SSD which would be SSD+13.

D. A table within **Section 4.19 (Non-Half Hourly Data Collector Service Levels)** has been omitted from the document. This table should have been included within the BSCP504 as a result of CP1230[16].

# 2 Solution

2.1 CP1266 proposes the following amendments to BSCP504 in order to rectify the issues highlighted above:

- **Point A**: Include the reference to the D0039 form within section 3.1.2.2. This would be consistent with section 3.1.11 in BSCP508[17], where the SVAA sends all the relevant Daily Profile Production reports to Suppliers and NHHDCs. The Master Registration Agreement (MRA) Data Transfer Catalogue also confirms that this data flow occurs.
- **Point B**: Replace 'Associated MOA' with 'New NHHDC' in section 3.2.3.9. This will necessitate a change to the text within the 'Action' column. The suggested change is highlighted below:

  ***'Old NHHDC to send additional information to the New NHHDC'***

[16] Movement of the functional requirements within PSL120 to BSCP504, following the creation of a generic non functional PSL (PSL100) via CP1182
[17] Supplier Volume Allocation Agent

- **Point C**: In order to clarify this issue, we propose that the paragraph does not refer to 'Final Reconciliation Volume Allocation Run'. And that the reference to NHHDA is removed to align to other sections within the BSCP.
- **Point D**: Include the relevant table within section 4.19. The table that needs to be included within the document is located in the final version of PSL120 Section 5.4: Appendix 4 Performance Levels.

## 3 Impact on BSCCo Operations

3.1 The estimated ELEXON implementation cost is 1.5 man days, which equates to £330.

## 4 Participant Impact Assessment

4.1 CP1266 was issued for participant impact assessment on 18 December 2008. It was issued as part of CPC00650. 12 responses were received of which, 9 agreed, 1 disagreed and 2 were neutral.

4.2 The majority of responses were in favour of the changes; however, one respondent raised a concern regarding point C. The respondent believed that the suggested changes within 'Point C' did not address the actual issues associated with section 3.3.1. Following discussion, the respondent agreed with ELEXON's view that CP1266 addresses the issues that were intended to be resolved. We also agreed with the respondent that we will review this section (separately from this CP) and provide feedback on how we believed the concerns could be addressed.

## 5 Recommendation

5.1 Based on majority support for CP1266 and the improvements in consistency and robustness of BSCP504, we recommend that SVG:

a. approve CP1266 for inclusion in the June 2009 Systems Release.

**IA Summary for CP1266 - Updates and Refinements to BSCP504**

| IA History CPC number | CPC00650 | Impacts | BSCP504 |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate) | Agreement (✓/X) |
|---|---|---|
| **EDF Energy** | **Supplier, NHH Agent and HH MOP** | ✓ |
| **Scottish Power** | **Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA** | ✓ |
| **NPower Limited** | **Supplier, Supplier Agents** | ✓ |
| **TMA Data Management Ltd** | **HHDC, HHDA and NHHDA** | ✓ |
| **AccuRead** | **NHHDC / NHHDA / NHHNOA / HHMOA** | ✓ |
| **Scottish and Southern Energy** | **Supplier/Generator/ Trader / Party Agent / Distributor** | ✓ |
| **E.ON UK Energy Services Limited** | **NHHDC-DA NHHMO HHMO** | ✓ |
| **E.ON** | **Supplier** | ✓ |
| **Electricity North West Ltd** | **LDSO** | ✓ |
| **British Energy** | **Supplier; Generator; Trader; CVA MOA** | X |
| **CE ELECTRIC** | **LDSO, UMSO** | - |
| **Independent Power Networks Limited** | **LDSO, UMSO, SMRA** | - |

Impact Assessment Responses

| Organisation | Agree | Comments | Impact | Days to Implement | ELEXON Comments |
|---|---|---|---|---|---|
| Scottish Power | ✔ | **Impact**: Documentation Changes Only | X | 0 | n/a |
| TMA Data Management Ltd | ✔ | These corrections are welcome to improve the clarity of BSCP504<br>**Impact:** Process | X | 0 | n/a |
| E.ON UK Energy Services Limited | ✔ | **Comments**: The changes identified will not have a significant impact on our activities as the changes reflect current practice. | X | - | n/a |

| | | | | | |
|---|---|---|---|---|---|
| E.ON | ✔ | **Comment:** The only issue E.ON can see is in relation to Section 3.3.1 where in a number of places it states, "Refer to section 3.3.11 Calculate AA/EAC Values and send to NHHDA and Supplier." Yet there is no NHHDA or Supplier in the 'To' column and no mention of the D0019 flow.<br>It obviously does refer to Section 3.3.11, but we think it loses a bit of context here as you have to dig around to fully follow the process. It could include the key elements above and also refer to 3.3.11 for the full process. | X | 30 | ELEXON discussed this issue with E.ON.<br>We explained that a change to section 3.3.1 would necessitate a change to other areas within BSCP504. This would be a major change to BSCP504 and would require an additional Impact Assessment.<br>E.ON believed that the effort involved in addressing this issue would outweigh any benefits. They where happy to leave the change as is. |
| Electricity North West Ltd | ✔ | **Impact:** Improved Documentation<br>**Implementation**: Housekeeping change only | - | - | n/a |
| British Energy | ✔ | **Comment:** Agree apart from amendments suggested in point three, further justification would be required as to why these amendments are necessary | X | - | We contacted British Energy in order to address their concerns.<br>British Energy believed that the suggested change in point three will only address consistency issues within BSCP504, it will not address the key issues associated with section 3.1.1.<br>We discussed this issue with the respondent and agreed that the CP did address the initial problem that this CP intends to resolve. We have agreed with the respondent that we will review their concerns separately from this CP and consider whether any further changes are needed. |

**Appendix 5 – Detailed Analysis of CP1269 - Publication of Additional Non Half Hourly Combination Data in Market Domain Data**

# 1 Summary

1.1 We raised CP1269 'Publication of Additional Non Half Hourly (NHH) Combination Data in Market Domain Data (MDD)' on 9 January 2009. This CP:

- Seeks to introduce a new entity table within MDD to help Suppliers identify valid combinations of attributes for Supplier Volume Allocation (SVA) Metering Systems;
- Progresses one of the conclusions of the MDD Expert Group (MDDEG), which you endorsed at your September 2008 meeting;
- Takes forward the automated solution from the two options suggested by the MDDEG in DCP0034;
- Involves changes to the MDD database, the introduction of a new version of the D0269 and D0270 data flows,[18] amendments to participant systems, and changes to the processes undertaken by Licensed Distribution System Operators (LDSOs) and Suppliers;
- Requires a consequential change to the Data Transfer Catalogue (DTC), which we will progress under Master Registration Agreement (MRA) governance; and
- Is related to (although not dependent on) CP1270 'Improvements to the MDD Process' and CP1271 'Align MDD Approval Timetable to SVG meetings', which we also present to you for approval in this paper.

1.2 A large majority of impact assessment respondents support CP1269. We recommend its approval for implementation in the November 2009 Release, subject to the MRA Development Board's (MDB's) approval of the required DTC changes.

1.3 There are different views from industry respondents as to which of the two existing versions (002 or 003) of the D0269/D0270 should be decommissioned. We set out the identified benefits and disadvantages of decommissioning either version. We recommend that you agree to decommission version 003, as proposed in the CP and supported by a majority of respondents.

# 2 Why change?

2.1 MDD is the reference data set used by Suppliers and Supplier Agents in the retail electricity market. It contains a number of entities that define the valid combinations of data items for an SVA Metering System. In particular:

- Entity 56 specifies (for NHH Metering Systems) the valid combinations of Distributor Id, Meter Timeswitch Class (MTC), Line Loss Factor Class (LLFC) and Standard Settlement Configuration (SSC) – **'Valid MTC LLFC SSC Combination'**;
- Entity 55 specifies (for Half Hourly (HH) Metering Systems) the valid combinations of Distributor Id, MTC and LLFC – **'Valid MTC LLFC Combination'**; and
- Entity 11 specifies (for NHH Metering Systems) the valid combinations of Grid Supply Point (GSP) Group, SSC and Profile Class (PC) - **'Average Fraction of Yearly Consumption Set'**.

[18] D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set'.

2.2 However, even when taken in combination, these tables do not provide Suppliers with enough information to know which combinations of NHH Metering System data items will be accepted by Supplier Meter Registration Services (SMRS). A registration request that is consistent with the above MDD entity tables may still be rejected by SMRS, or queried by the LDSO, if the particular combination of SSC, PC and LLFC does not correspond to a Distribution Use of System (DUoS) tariff on that LDSO's network.

2.3 There is therefore an absence of a single, reliable source of information for Suppliers on which combinations of Metering System attributes are valid. This leads to higher costs for Suppliers (and potentially also for LDSOs), who require manual processes to identify and correct these erroneous registrations. Suppliers must either obtain this information from various sources (e.g. LDSOs' DUoS statements) or run the risk of registrations being rejected. Either option involves unnecessary expense and inconvenience for Suppliers (and potentially also for customers, if errors in registration data lead to problems with billing).

# 3 Solution and suggested benefits

3.1 The MDDEG recommended to you in paper 92/04 that:

- A new entity should be added to MDD to record valid combinations of MTC, LLFC, SSC and PC for each Distributor Id – 'Valid MTC LLFC SSC PC Combination';
- A flag should be added to the new entity to identify preserved tariffs;[19] and
- A DCP should be raised to progress these changes.

3.2 The MDDEG concluded that publishing the proposed reference data would make the process of registering Metering Systems in SMRS more efficient, facilitating the smooth operation of the retail market and competition in supply. The new data should reduce the effort needed by Suppliers to obtain details of valid combination data, as well as that spent by Suppliers and LDSOs in resolving incorrect combinations.

3.3 You endorsed the MDDEG's recommendations at your September 2008 meeting, and we raised DCP0034 on 1 October 2008.

3.4 **Option of automated or manual solution in DCP0034**

3.4.1 At your September meeting, you recognised the two possible approaches identified by the MDDEG for delivering the proposed data:

- **Option 1 (automated solution)**: The new entity would be included in a new version of the D0269 and D0270 MDD flows. This would require changes to the DTC and the MDD Management (MDDM) database. The new entity would be reflected in BSCP509 'Changes to Market Domain Data'.
- **Option 2 (manual solution)**: The new entity would still be included in BSCP509, but would be maintained manually in spreadsheet form on our website to avoid changes to the DTC and MDDM database. We would update the spreadsheet with each new version of MDD.

In DCP0034, we put both of these options forward to the industry for comment.

[19] Preserved tariffs are DUoS tariffs that are no longer available to Suppliers from specified dates. Although Suppliers therefore cannot use any combinations which are linked to preserved tariffs for new customers, such combinations will still be supported for those customers who already use them.

 

3.4.2 We received 15 responses to DCP0034, of which 5 supported the automated solution, 6 supported the manual solution and 4 offered no preference. You can download copies of the full DCP impact assessment responses from our website.

3.4.3 Respondents who preferred the **manual** option generally believed that this would avoid the costs of an automated solution and/or would reduce the impact on participant systems.

3.4.4 Respondents who preferred the **automated** solution believed that a manual option would not be reliable/robust as it would result in a disjoint in MDD data, would contain the risk of manual error, and/or might be ignored since it would not form part of normal MDD update channels.

### 3.5 Reasons for choosing automated solution in CP1269

3.5.1 We agreed with the view that the automated solution would be more robust, and therefore progressed this option by raising CP1269. However, following the industry feedback in the DCP responses, we sought to minimise the system impacts of the automated solution as described below.

### 3.6 Change to decommissioned flow version in CP1269

3.6.1 There are currently two active versions of the D0269 and D0270 flows – version 002 and version 003. MRA governance does not support more than two versions of a flow.

3.6.2 We therefore noted in DCP0034 that the automated solution would require version 002 (or potentially version 003) to be decommissioned, in order to introduce the new version 004. Following the DCP impact assessment, we chose to base the CP1269 automated solution on decommissioning **version 003**. This is because:

- Several DCP respondents expressed concerns over the need to amend NHH Data Aggregator (NHHDA) and NHH Data Collector (NHHDC) systems to accept the new flow version, when the change would not benefit them;
- Several respondents (in further conversations with us) suggested that decommissioning version 003 would lessen the impact on Party Agents, noting that the central NHHDA software uses version 002 of the D0269;
- Some respondents noted that decommissioning version 003 would avoid amending the central Supplier Volume Allocation Agent (SVAA) system, which also uses the D0269 version 002; and
- Several respondents suggested to us that it would be more difficult for those participants using version 002 to upgrade to version 004, since there are historic reasons why they have chosen to continue using the older flow version.

We therefore believed that decommissioning version 003 could reduce the impact on Party Agents, and that this could be appropriate since the potential benefits of the CP are to Suppliers and LDSOs.

3.6.3 We invited participants to comment on the efficiency and appropriateness of this approach as part of the CP1269 impact assessment. We received differing opinions, although a majority of those who expressed a preference support decommissioning version 003. We have summarised the responses in Section 5.

 

# 4 Costs, impacts and implementation approach

## 4.1 Documentation impacts

4.1.1 The CP1269 automated solution impacts the following Code Subsidiary Documents: BSCP509; BSCP509 Appendix 'MDD Entity Change Request Forms'; and SVA Data Catalogue Volumes 1 and 2.

4.1.2 We issued the proposed redlined document changes to participants for impact assessment, and these are included as attachments to this paper. No respondents had any comments on the draft redlining.

4.1.3 In addition, CP1269 would require a change to the DTC. We provided a draft DTC CP and proposed DTC redlining to participants for information as part of the CP1269 impact assessment, and copies of these are attached. No comments were received. If you agree to approve CP1269, we will raise and progress the DTC CP under MRA governance.

## 4.2 Service Provider impacts and costs

4.2.1 The Logica implementation costs for CP1269 are £73,775 to:

- Add the new entity to the D0269 and D0270 flows;
- Enhance the MDDM database to store the new data; and
- Publish the new version 004 of the flows.

4.2.2 We provided details of these costs to participants as part of the CP1269 impact assessment. There are no Logica operational costs.

4.2.3 Note that these costs are based on decommissioning version 003 of the flows. Removing version 002 would require changes to NHHDA and SVAA systems at additional cost. Please see Section 5 for indicative costs if NHHDA and SVAA systems were to be changed.

## 4.3 ELEXON impacts and costs

4.3.1 Our implementation costs for CP1269 are 57 man days of effort (equating to £12,540) to:

- Manage the development and implementation of the MDD system changes, including undertaking system testing;
- Amend and test the MDD Load Utility;[20] and
- Implement the redlined changes to the impacted Code Subsidiary Documents.

4.3.2 We included these costs in the impact assessment information provided to the industry. We would not incur any increase in operational costs.

## 4.4 Participant impacts and costs

4.4.1 Whichever version of the D0269 and D0270 is decommissioned; those participants who currently use that flow version will be required to amend their systems and processes to support the new version 004. There are differing industry views on the appropriate version to decommission, and we have summarised these in Section 5.

4.4.2 If you approve CP1269, we will undertake a one-off implementation exercise asking LDSOs to populate the new entity table. Suppliers wishing to use the new data will need to amend their systems and processes to receive and use version 004 of the D0269/D0270.

[20] The MDD Load Utility is a Microsoft Access database which we maintain, and which converts MDD files into a readable format. We use it in validating MDD Change Requests, and we also make it available to participants on request.

 

4.4.3 No specific cost information was provided by any of the respondents to DCP0034 or CP1269, although two respondents to the CP provided a view of the likely materiality of the system costs to their organisations (see Section 5).

### 4.5 Implementation approach

4.5.1 Participants' impact assessment responses to DCP0034 indicated that the earliest possible implementation for the automated solution would be the November 2009 Release. We therefore proposed this as the Implementation Date for CP1269, and invited the industry to confirm whether this is achievable. No respondents to CP1269 disagreed with the proposed November 2009 implementation. The specific lead times requested by impacted participants ranged from 60-270 days.

4.5.2 The MRA requires 6 months' notice to implement the required DTC change. If you agree to approve CP1269, we will raise and progress a DTC CP in time for a parallel implementation with CP1269 in November 2009.

## 5 Industry views on benefits

5.1 We received 16 responses to the CP1269 participant impact assessment, of which 10 agreed with the CP, 1 disagreed and 5 were neutral.

5.2 Despite the large majority support for the intention and benefits of the CP, respondents gave differing views on which version of the D0269/D0270 should be decommissioned. Strong views were expressed both by those who favoured decommissioning version 002, and by those who believed that version 003 should be discontinued.

5.3 Not all respondents initially provided details of which version of the D0269/D0270 their organisation used, how they would be impacted, or which flow version they would prefer to decommission. We have therefore contacted the respondents directly, seeking to clarify their views and impacts. The table below summarises respondents' views as to which flow version should be retained. Overall, there is a majority preference among respondents for retaining version 002 and decommissioning version 003, although strong views continue to be held on either side.

| Reasons to keep version 002 | Reasons to keep version 003 |
|---|---|
| Many respondents argue that users of version 002 have continued to use this older flow version because there are historic reasons why it is difficult for them to upgrade. *(Respondents generally did not provide detailed information on the reasons for these difficulties, although one respondent advised that moving from version 002 to version 004 would require their organisation to upgrade to a later version of Microsoft Access).*<br><br>These respondents believe that it is easier for version 003 users to move to version 004.<br><br>Overall, a majority of respondents who expressed a preference support keeping version 002. | A minority of those respondents who expressed a preference between flow versions believe that it is inappropriate to remove a more recent 'improved' version and keep an older one.<br><br>These respondents argue that this would:<br>• Go against normal MRA flow-numbering conventions;<br>• Discriminate against newer entrants and other participants who have made the effort to upgrade to version 003;<br>• Mean that the same participants will always be impacted by any future changes to these flows.<br><br>One respondent does not support the CP and does not agree that version 003 should be decommissioned. |

 

| Reasons to keep version 002 | Reasons to keep version 003 |
|---|---|
| Several respondents will only support the CP if version 002 is retained. | |
| Keeping version 002 would avoid amending central NHHDA and SVAA systems to use version 004 *(estimated costs are £20k to amend NHHDA and £16k to amend SVAA).*[21] | Two respondents believe that the costs to their organisations of upgrading from version 003 to version 004 would be at least comparable to the costs of changing NHHDA/SVAA systems *(no other respondents provided any cost information)*.<br>One respondent argues that Suppliers and Party Agents should not bear the costs of changing their systems in order to avoid an impact on central systems managed by ELEXON. |

5.4 In Section 7 we have included the full industry impact assessment responses and details of our further discussions with the respondents. In the following Section 6 we outline our conclusions based on these responses/discussions.

## 6 ELEXON conclusions

6.1 We agree that introducing the proposed entity table in a new version 004 of the D0269 and D0270 would improve the efficiency of Metering System registrations, by reducing the number of registrations which are queried or rejected. We consider that this would deliver benefits to Suppliers, and potentially also to LDSOs. We therefore agree with the MDDEG and the majority of impact assessment respondents that CP1269 should be approved.

6.2 The industry responses received to the CP impact assessment demonstrate that there is no easy way to reduce the impact of the D0269/D0270 changes on Party Agents (who do not benefit from the CP) and place the impact solely on those participants who will benefit from the new data (Suppliers and potentially LDSOs). Aside from NHHDAs, who consistently use version 002 of the D0269 because this is the version used by the central software, there is a mixture of participants within each market role who use either version 002, version 003 or both versions of the flows.

6.3 Table 2 shows the percentages of participants within each affected role type who receive version 002, version 003 or both versions of the D0269/D0270 over the DTN. These figures have been provided by the SVAA, and are aggregates across recipients of the two D-flows.

**Table 2 – SVAA figures on flow versions are received by affected participants**

| Role[22] | Receive v2 over DTN | Receive v3 over DTN | Receive both v2 and v3 | Impacted if v2 removed | Impacted if v3 removed |
|---|---|---|---|---|---|
| NHHDAs | 90% | 0% | 10% | 100% | 10% |
| NHHDCs | 33% | 66% | 0% | 33% | 66% |
| HHDAs | 33% | 66% | 0% | 33% | 66% |
| HHDCs | 50% | 50% | 0% | 50% | 50% |
| Suppliers | 40% | 30% | 30% | 70% | 60% |
| Distributors | 29% | 42% | 29% | 58% | 71% |

[21] Note that we obtained these figures at the DCP stage, and that they are only indicative costs. We would need to commission a further impact assessment from Logica to establish the exact costs involved.

[22] No information is included for Meter Operator Agents (MOAs). This is because respondents have advised that the Wheatley MOP application is manually updated, and is therefore not a major consideration in the choice of which flow version to decommission.

6.4 Note that this table only shows the percentage of a given role type which is impacted by the choice of flow. The impact at an organisational level will be different, as many organisations fulfil multiple market roles.

6.5 We are sympathetic to the views of some respondents that version 002 should be decommissioned on principle because it is the older flow version. We agree that it initially appears counter-intuitive to remove a newer improved version. However, we note that there is a majority preference among respondents for keeping version 002, and that this is true even among respondents who use both flow versions. This suggests that users of version 002 do have greater practical difficulties in upgrading, although we have not been able to obtain detailed information on the reasons for these difficulties. We note that the support of some respondents for the CP is contingent on version 002 remaining. We note also Gemserv's advice that MRA governance allows either the newer or older flow version to be decommissioned.

6.6 It has not been possible for us to assess the relative costs to the industry of decommissioning version 002 or version 003. While Suppliers and LDSOs as BSC Parties would share part of the central costs of amending NHHDA/SVAA systems, Suppliers may also ultimately pay the costs of changes to their agents' systems. Whichever flow version is decommissioned, many participants across different roles will be affected, and one respondent has indicated that the costs to them may be comparable to those involved in changing NHHDA/SVAA. No other respondents have provided cost information. Rather than suggest another round of impact assessment, we have focused on obtaining as much information as possible from direct discussions with respondents.

6.7 We consider that it is unlikely that version 002 will be retained indefinitely. Technology will move on and new flow versions will be needed. One respondent has indicated that they plan to upgrade from version 002 within the next year.

6.8 On balance, we consider that retaining version 002 and decommissioning version 003 is the most pragmatic solution at this time given the views and information provided by respondents. As this is consistent with the solution proposed by CP1269, we recommend that you approve the CP for implementation.

# 7 Recommendation

7.1 On the basis of the considerations which we have set out above, our recommendation is to **approve** CP1269.

7.2 Given the lead times required by participants to amend their systems and processes, and by the MRA to implement the necessary DTC changes, we recommend that CP1269 should be implemented as part of the **November 2009 Release**.

7.3 Implementation of CP1269 remains subject to the MDB's approval of the consequential DTC changes. If you approve CP1269, we will raise and progress the necessary DTC CP under MRA governance.

 

**IA Summary for CP1269**

**Table 3 – IA summary for CP1269 'Publication of Additional Non Half Hourly Combination Data in Market Domain Data'**

| IA history CPC No. | CPC0 0651 | Impacts | BSCP509; BSCP509 Appendix; SVA Data Catalogue Volumes 1 and 2; DTC |
|---|---|---|---|

| Organisation | Capacity in which organisation operates | Agree? (Yes/No) | Calendar days required to implement |
|---|---|---|---|
| Central Networks | Distributor | Yes | 60 days (subject to comment in table below) |
| Scottish and Southern Energy | Supplier/Generator/Trader/Party Agent/Distributor | Yes | 6-9 months |
| Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | 270 days |
| TMA Data Management | HHDC, HHDA, NHHDC and NHHDA | Yes | 90 days |
| British Energy Direct | Supplier | Yes | Zero – not impacted |
| AccuRead | NHHDC, NHHDA, NHHMOP, HHMOP | Yes | Zero – not impacted |
| Npower | Supplier, Supplier Agents | Yes | Not indicated, but the respondent has confirmed that they can meet the proposed November 2009 implementation |
| Electricity North West | LDSO | Yes | At least 6 months from approval of the change |
| E.ON | Supplier | Yes | Minimum 182 days |
| Independent Power Networks | LDSO, UMSO, SMRA | Yes | Not indicated, but the respondent has confirmed that they can meet the proposed November 2009 implementation |
| EDF Energy | Supplier, NHH Agent and HH MOP | No | 180 days |
| Gemserv | MRASCo | Neutral | 6 months from approval of DTC CP |
| Western Power Distribution | LDSO/MOA/SMRA | Neutral | 90 days |
| CE Electric | LDSO, UMSO | Neutral | Zero – not impacted |
| E.ON Energy Services | MOA NHHDC/DA | Neutral | Not indicated, but the respondent has confirmed that they can meet the proposed November 2009 implementation |
| Siemens Metering Services | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO) | Neutral | Zero – no impact |

**Table 4 – Full impact assessment responses**

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| Central Networks | Yes | ✓ | Update required of all systems that read in MDD data.<br>Implementation notice is dependant on full spec of new table when this is made available. | **The respondent uses flow version 003 in their role as an LDSO. They support the CP despite the impact on their organisation.**<br>The respondent is unable to confirm their exact implementation lead time until they have sight of a dummy file and details of the new file size. We have clarified that we are unable to provide this information until Logica has developed the new file as part of the implementation.<br>The respondent has confirmed that this does not affect their support for the CP. |
| Scottish and Southern Energy | Yes | ✓ | Impacts on our Systems and Processes on decommissioning version 3. With cost implications. This will also have an impact on the SONET. | **The respondent uses both version 002 and version 003.** They are therefore impacted whichever version is decommissioned.<br>**The respondent's preference is to decommission version 003, as this has least impact for them.** |
| Scottish Power | Yes | ✓ | We agree that the automated solution is the best way forward, as this enhanced version will contain the full MDD information in a single repository. We also agree that decommissioning version 003 is more appropriate as it will lessen the impact of the change on those parties who currently use version 002, while still providing an enhanced Market Domain Data Set.<br>Our systems will have to be reconfigured to accept the updated version of MDD and the D0269/D0270 flows. | **The respondent uses both version 002 and version 003.** They are therefore impacted whichever version is decommissioned.<br>**The respondent's preference is to decommission version 003.** It would be more difficult for them to upgrade their systems which use version 002. |
| TMA Data Management | Yes | ✓ | We support this CP as long as a high majority of Suppliers actually benefit from the changes.<br>There will be an impact on our systems.<br>We do support the provision of additional data to enable registration data validation by Suppliers to avoid unnecessary flow rejection, however the rationale that | **The respondent uses both version 002 and version 003.** They are therefore impacted whichever version is decommissioned.<br>**The respondent's preference is to decommission version 002, for the reasons given in their response.** |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| | | | the agents using V3 flows are more likely to be able to update their system easily is not acceptable. It is discrimination against the party agents that do use more recent software or have entered the market more recently. Does that mean that Elexon, in the future, will only support changes to the D0269/D0270 on the higher version number, ensuring that the same party agents are always impacted? | We have discussed the range of industry views with the respondent, and the arguments in favour of decommissioning version 003. While they still believe strongly that it is more appropriate to decommission version 002, they understand the differing views and the reasons for ELEXON's recommendation to remove version 003. |
| British Energy Direct | Yes | X | See next column. | **The respondent uses flow version 002. While their preference is to decommission version 003, they would still support the CP if version 002 was discontinued.**<br>The respondent originally indicated that they would be impacted by CP1269. However, following further discussion with us they have advised that they use version 002 and are therefore not impacted provided this version is retained. |
| AccuRead | Yes | X | We agree with this change on the proviso that Version 2 of the D0269 is to remain the same. | **The respondent uses flow version 002 in their role as a DA/DC.** The Wheatley MOP application is manually updated. They are therefore not impacted if version 003 is decommissioned.<br>**The respondent only supports the CP as long as version 002 is retained.** |
| Npower | Yes | ✓ | System and process impact.<br>We agree with this change but we believe Elexon should look at the number of participants impacted by the de-commissioning of either version and the associated costs before making a decision. | **The respondent uses both version 002 and version 003.** They are therefore impacted whichever flow version is decommissioned.<br>**The respondent's preference is to decommission version 002.** As a principle, they believe that the older of the two flow versions should always be decommissioned rather than the newer improved version. Their costs to amend their systems to receive version 004 rather than version 003 are likely to be comparable to the costs of amending NHHDA/SVAA |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| | | | | systems if version 002 is removed, and they therefore consider that it would be more appropriate to amend the central systems.<br>**The respondent agrees that the CP will benefit Suppliers. They will therefore ultimately support the CP whichever flow version is decommissioned, providing that the principles are sound and the choice of version is not arbitrary.** |
| Electricity North West Ltd. | Yes | ✓ | Our systems currently use version 2 and version 3. Therefore which ever version is removed it will have an impact on our systems. | **The respondent uses both version 002 and version 003 as an LDSO.** They do not have a preference as to which version should be decommissioned, as each approach has equal impact.<br>**The respondent therefore supports the CP regardless of which version is chosen.** |
| E.ON | Yes | ✓ | This change would resolve the issues we face, E.ON are supportive of this change.<br>Changes will need to be made to both processing of MDD flows (D0269 & D0270) in order to store new information, and also to use of that new data within MDD calculation batches used for outgoing flows (D0205). | **The respondent uses flow version 003 and their preference is to decommission version 002.**<br>However, the respondent would be impacted either way, as they would wish to move to the new version 004 whichever flow version is removed. **They therefore support the CP regardless of which flow version is chosen.** |
| Independent Power Networks Ltd. | Yes | ✓ | None. | **The respondent uses flow version 003. However, the impact on them to upgrade to version 004 is not onerous, and they support the CP whichever flow version is decommissioned.** |
| EDF Energy | No | ✓ | We do not agree with removing version 003 and introducing a version 004. This goes against the flow version numbering regime. We do not see why Suppliers and other agents should bear the costs of changing their systems that use version 003 of MDD just so that NHHDA and SVAA applications, under Elexon's control, remain unchanged. If this change is to go forward then NHHDA | **The respondent does not support the CP and does not agree with the decommissioning of version 003.**<br>The respondent has clarified that they already have an internal process to create a reference table of valid Metering System attributes using existing MDD data, for use within their organisation. They therefore do not see |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| | | | and SVAA applications should be upgraded to use either current version 003 or new version 004 and flow version numbering maintained in a logical manner.<br>Changes to our systems will be required. | any benefit to them as a Supplier from CP1269.<br>The respondent uses version 003 and on principle does not agree that a newer flow version should be decommissioned in favour of an older one. The respondent argues that, if this principle is followed for all future changes to the D0269/D0270, the impact of the changes will always disproportionately fall on those participants who have incurred the cost and effort of upgrading to the newer flow version. The respondent considers that future developments such as smart metering are likely to require significant changes to existing data flows, and that it is not acceptable to maintain version 002 indefinitely.<br>We have clarified that the proposal to decommission version 003 resulted from industry suggestions that this would lessen the impact on participants. We are neutral as to whether NHHDA/SVAA systems should be amended, and believe that this is a question for the industry as Parties would ultimately pay for these changes. The respondent notes that the costs to participants of decommissioning version 003 may be comparable (if not greater) than the costs of amending the central systems.<br>The respondent notes that there are differing industry views on the appropriate flow version to retain, and that we will present all views to you for consideration. However, their strong belief is that version 003 should be retained. |
| Gemserv | Neutral | ✓ | There would need to be changes to the automated D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set' MDD flows for use by participant systems.<br>Changes to DTC - Implementation timescales: | **Gemserv has confirmed that it has no preference from a DTC/MRA governance perspective as to whether version 002 or version 003 of the D0269/D0270 is decommissioned.**<br>Gemserv has also confirmed that the timescales given in |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| | | | • From point CP is submitted to MDB decision – approximately 1 month<br>• From MDB approval to implementation – standard implementation timescale for any changes to the DTC is 6 months. Changes would be implemented in line with MRA release strategy (there are three releases a year, in February, June and November).<br>• If it is a system change then from the date of approval, industry would need 6 months to update their systems accordingly. A procedural change would take approximately 3 months. | its response for progressing the required DTC changes apply regardless of which flow version is decommissioned.<br>If CP1269 is approved, we will raise and progress the necessary DTC CP under the MRA. |
| Western Power Distribution | Neutral | ✓ | If Parties will find it of use having this table in MDD then we agree that it should be included in the D0269/D0270 version 3. Having queried this change with Elexon we understand that SMRS will not need to be updated with the new table and will not be required to change existing validation rules; the new table will be for reference purposes only. If this was not the case we would possibly oppose it on grounds of cost.<br>Presumably we will need to populate and maintain the new table?<br>Implementation lead time is to enable the necessary MDD forms to be prepared, approved and implemented. | **The respondent uses flow version 002. As an LDSO they are neutral to the change, believing that the benefits will be to Suppliers.**<br>The only impact on the respondent is that, as an LDSO, they will need to populate the new table during implementation. |
| CE Electric | Neutral | X | None. | **The respondent uses flow version 002.**<br>The respondent originally indicated that they would be impacted by CP1269. However, following further discussion with us they have confirmed that they use version 002 and are therefore not impacted providing that version 003 is decommissioned. |
| E.ON Energy Services | Neutral | ✓ | None. | **The respondent uses version 002 as an NHHDA and version 003 as an NHHDC.** The Wheatley MOP application is manually updated. |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | Summary of ELEXON's discussions with the respondent |
|---|---|---|---|---|
| | | | | The respondent originally indicated that they would not be impacted by CP1269. However, following further discussion with us they have confirmed that they will be impacted whichever flow version is decommissioned.<br>**The respondent is neutral as to which flow version should be chosen.** Although they are not directly benefited by the CP, they consider that the impacts on their organisation are not onerous. |
| Siemens Metering Services | Neutral | X | None. | **The respondent uses flow version 002.**<br>The respondent's original response indicated that they would be impacted by CP1269. However, following further discussion with us they have confirmed that they are not impacted providing that version 003 is decommissioned. |

Comments on redlined text

None received.

**Appendix 6 – Detailed Analysis of CP1270 - Improvements to the Market Domain Data Process**

# 1 Summary

1.1 We raised CP1270 'Improvements to the Market Domain Data (MDD) Process' on 9 January 2009. This CP:

- Seeks to deliver improvements and increased clarity to the MDD process set out in BSCP509 'Changes to Market Domain Data' and BSCP509 Appendix 'MDD Entity Change Request Forms';
- Progresses one of the conclusions of the MDD Expert Group (MDDEG), which you endorsed at your September 2008 meeting;
- Follows on from DCP0036;
- Has no impact on any systems; and
- Is related to (although not dependent on) CP1269 'Publication of Additional Non Half Hourly (NHH) Combination Data in MDD' and CP1271 'Align MDD Approval Timetable to SVG meetings', which we also present to you for approval in this paper.

1.2 All impact assessment respondents either support CP1270 or are neutral. We recommend its approval for implementation in the June 2009 Release.

# 2 Why change?

2.1 The MDDEG recommended to you in paper 92/04 that various changes to BSCP509 and BSCP509 Appendix should be made to deliver process improvements and additional clarity. You endorsed this recommendation, and we subsequently raised DCP0036 on 1 October 2008.

2.2 Following favourable industry impact assessment responses to the DCP, we raised CP1270[23].

# 3 Solution

3.1 The table below summarises the proposed changes to BSCP509 and BSCP509 Appendix.

| BSCP509 | |
|---|---|
| **Section** | **Proposed change(s)** |
| 1.5 'Associated BSC Procedures' | **Remove reference to BSCP11 'Trading Queries and Trading Disputes'.** BSCP11 does not apply to the MDD process since, if an error is identified in an MDD Publish,[24] a process already exists in BSCP509 to correct the error in the next MDD version.<br><br>**Remove references to BTDP38, BSCP511, BSCP512 and BSCP531 (and their associated footnote).** These documents are no longer active and the references are therefore redundant. |

[23] You can download copies of the full DCP impact assessment responses from our website.

[24] An MDD Publish means the distribution of all MDD flows to participants by the Supplier Volume Allocation Agent.

| BSCP509 | |
|---|---|
| **Section** | **Proposed change(s)** |
| Appendix 4.1 'MDD Entities and Authorisations Route' | **Insert footnote for Entities 53 and 56, highlighting to Suppliers that they should liaise with the relevant Licensed Distribution System Operator (LDSO) before submitting either of these entity forms to ELEXON.**<br>Entity 53 'Meter Timeswitch Class (MTC) for Distributor' indicates that a particular MTC is supported by an LDSO. Entity 56 'Valid MTC/SSC/LLFC Combinations' allows a participant to link Line Loss Factor Classes (LLFC) to valid MTC/Standard Settlement Configuration (SSC) combinations. The footnote clarification will help ensure that the correct/valid combinations have been selected before beginning the MDD change process. |
| Appendix 4.2 'MDD Entity Change Request Forms' | **Make the following changes to the F509/01 form:**<br>• Remove the 'Justification' field, as this duplicates the 'Reason for Change' field.<br>• Add a 'Role Code' field so that the MDD change originator can be identified.<br>• Add a check box for the Originator to confirm (if the data item does not belong to them) that the owner of the data item has provided their approval/consent to the change. |
| **BSCP509 Appendix** | |
| **Section** | **Proposed change(s)** |
| Entity 45 form | **Amend the 'Other Information' details for 'Address Line 1', to ensure that this mandatory field is populated with the Participant Name.** The remaining lines will then be followed by the address details. |
| Whole document | **Review and (where necessary) update the examples in the entity forms.** This will ensure that they remain the clearest and most correct examples, given the amount of time which has passed since they were originally drafted into the BSCP. |

3.2 We provided participants with the draft redlining to BSCP509 and BSCP509 Appendix as part of the CP impact assessment. Copies of the redlining are attached to this paper. We received one comment on the redlined changes to BSCP509 Appendix, which is described in Section 5.

## 4 Costs, impacts and implementation approach

4.1 Our implementation costs for CP1270 are 3.5 days of effort (equating to £770) to update BSCP509 and BSCP509 Appendix. We would not incur any operational costs, and there are no impacts on any systems or other Configurable Items.

4.2 A majority of industry impact assessment respondents are not impacted by CP1270, although some LDSOs and Suppliers have indicated they will need to make minor process changes. The maximum lead time requested by participants is 30 days.

4.3 In the CP form we recommended implementation in the June 2009 Release, as this is the next available release for a documentation change. All respondents agreed with this approach.

## 5 Industry views on benefits

5.1 We received 14 responses to the CP1270 participant impact assessment, of which 11 agreed with the CP and 3 were neutral. The full industry responses are provided in Section 7.

5.2 Two respondents provided specific comments on the CP. One welcomed the MDDEG's recommendations, believing that the CP will bring further clarity to BSCP509. The other respondent initially raised concerns that LDSOs are not directly consulted over MDD Change Requests. However, following our further discussions with the respondent, they are happy that our current working practices and the proposed BSCP changes in CP1270 require Suppliers to speak to their LDSO before submitting a Change Request which affects them. For further details, please see the full responses in Section 7.

5.3 One respondent commented on the proposed redlined changes to Entity 45 in BSCP509 Appendix. The respondent noted that CP1270 proposes that Address Line 1 should be a mandatory field, but that the column name appears to be missing on page 11 of the redlined text attachment. We have confirmed with the respondent that the column name appears in the existing BSCP509 Appendix wording, but that we inadvertently failed to copy it into the redlined text attachment. No amendments to the proposed redlining are required, as the comment relates to the existing BSCP wording (which is correct) and not the changes proposed by the CP.

## 6 Conclusion and recommendation

6.1 We agree that CP1270 will improve the clarity, and thereby the efficiency, of the MDD change process. Our recommendation is therefore to **approve** CP1270 for implementation as part of the **June 2009 Release**.

## IA Summary for CP1270 - Improvements to the Market Domain Data Process

| IA history CPC no. | CPC00651 | Impacts | BSCP509; BSCP509 Appendix |
|---|---|---|---|

| Organisation | Capacity in which organisation operates | Agree? (Yes/No) | Calendar days required to implement |
|---|---|---|---|
| Western Power Distribution | LDSO/MOA | Yes | 30 days |
| SSE | Supplier/Generator/Trader/Party Agent/Distributor | Yes | Zero – no impact |
| EDF Energy | Supplier, NHH Agent and HH MOP | Yes | 30 days |
| SAIC on behalf of Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | Zero – no impact |
| TMA Data Management | HHDC, HHDA, NHHDC and NHHDA | Yes | Zero – no impact |
| British Energy Direct | Supplier | Yes | Zero – no impact |
| Npower | Supplier, Supplier Agents | Yes | Zero – no impact |
| CE Electric UK | LDSO, UMSO | Yes | Not provided, but the respondent has confirmed that they support the proposed implementation in June 2009 |
| E.ON | Supplier | Yes | Zero – no impact |
| Siemens Metering Services | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO) | Yes | Zero – no impact |
| Independent Power Networks | LDSO, UMSO, SMRA | Yes | Zero |
| Gemserv | MRASCo | Neutral | Zero – no impact |
| AccuRead | NHHDC, NHHDA, NHHMOP, HHMOP | Neutral | Zero – no impact |
| E.ON UK Energy Services | MOA NHHDC/DA | Neutral | Zero – no impact |

Detailed Impact assessment responses

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | ELEXON's response |
|---|---|---|---|---|
| Western Power Distribution | Yes | ✓ | Small procedural change. | - |
| EDF Energy | Yes | ✓ | Impact on processes. | - |
| Scottish Power | Yes | X | We welcome the recommendations of the MDD Expert Group as we believe that this will bring further clarity to BSCP509.<br>Documentation changes only. | - |
| CE Electric UK | Yes | ✓ | None. | The respondent has confirmed that the only impact on their organisation is that (as an LDSO) they may need to liaise with Suppliers on combination data queries. They support the proposed Implementation Date. |
| Independent Power Networks Ltd. | Yes | ✓ | Process impacts – see comments below.<br><br>We would like to reiterate that we believe that that no MDD Change Proposal submitted by a party other than the LDSO, that affects the LDSO, should be considered without sign-off by the LDSO.<br><br>Though we will have the opportunity to comment through the change process, we would prefer to be consulted directly, rather than through the consultation stage of the process, considering the relevance to our MDD, charging statement, DUoS billing and the systems that support those processes.<br>There is already a large volume of documentation already in circulation and as a small company this takes a lot of time and resource to evaluate. We would therefore prefer to be consulted directly, rather than through the consultation stage of the process. | When a Supplier submits an MDD Change Request which affects the LDSO (i.e. relating to Entities 53 and 56), we check whether the Supplier has spoken to the LDSO and ask them to do so before submitting the change. This is currently a working practice which is not mentioned in BSCP509.<br><br>CP1270 will explicitly clarify in the BSCP that Suppliers should speak to the relevant LDSO before submitting these Change Requests, and we will continue to check with Suppliers that they have done so.<br><br>We have contacted the respondent to clarify whether the current process and proposed BSCP changes address their concerns. The respondent believes that these should be sufficient to allow direct LDSO involvement in such Change Requests. They propose to monitor the effectiveness of the process and |

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | ELEXON's response |
|---|---|---|---|---|
| | | | | will advise us if they believe any Suppliers are not complying with the new BSCP requirement. They are therefore happy to support the CP. |

Comments on redlined text

| No. | Organisation | Document name | Location | Severity | Comments | ELEXON's recommendation |
|---|---|---|---|---|---|---|
| 1 | Scottish Power | CP1270 Attachment B – BSCP509 Appendix | Page 11- MDD Entity 45 Form | Low | Address Line 1 is identified as a mandatory field, however it would appear that Address Line 1 has been omitted from the form as it is currently shown as a blank line. | We have confirmed with the respondent that the column name appears in the existing BSCP509 Appendix wording, but that we inadvertently failed to copy it into the redlined text attachment.<br>We recommend that no amendments are made to the proposed redlining, as the comment relates to the existing BSCP wording rather than the changes proposed by the CP. |

**Appendix 7 – Detailed Analysis of CP1271 - Align Market Domain Data Approval Timetable to SVG Meetings**

# 1 Summary

1.1 We raised CP1271 'Align Market Domain Data (MDD) Approval Timetable to SVG Meetings' on 9 January 2009. This CP:

- Seeks to amend the key dates in the MDD approval timetable, so that these relate to the monthly SVG meetings rather than Performance Assurance Board (PAB) meetings;
- Progresses one of the conclusions of the MDD Expert Group (MDDEG), which you endorsed at your September 2008 meeting;
- Follows on from DCP0037;
- Has no impact on any systems; and
- Is related to (although not dependent on) CP1269 'Publication of Additional Non Half Hourly (NHH) Combination Data in MDD' and CP1270 'Improvements to the MDD Process', which we also present to you for approval in this paper.

1.2 All impact assessment respondents either support CP1271 or are neutral. We recommend its approval for implementation in the June 2009 Release.

# 2 Why change?

2.1 In BSCP509 'Changes to MDD', the approval timetable for MDD changes is linked to PAB meeting dates. This link was intended to allow newly qualified Parties to register in MDD as soon as they receive approval from the PAB. In practice this intention has not been achieved, because the BSCP requires new entrants to meet the same submission deadline as other participants for MDD Change Requests. New entrants can therefore currently wait up to two months before their changes are published in MDD. The existing timetable also means that we submit MDD changes to you via an ex-committee SVG paper. This gives you 5 Working Days to review the changes and reach a decision by email.

2.2 The MDDEG recommended to you in paper 92/04 that all the dates in the MDD approval process should instead be calculated around the monthly SVG meeting dates. This would benefit the MDD process by enabling you to discuss collectively any issues or comments at the normal monthly SVG meetings. It would remove the effort associated with the existing ex-committee process and the inefficiency in gaining agreement by email.

2.3 The MDDEG also recommended that a 'fast track' option should be included within the revised approval timetable. Under this process, the submission deadline for Change Requests from new entrants would be closer to the SVG meeting date. This would allow these participants to gain PAB approval, submit the change and (if approved) have it published in the next version of MDD rather than wait an additional month. The fast track timetable would still enable you to undertake an advance review of the changes before reaching a decision at the SVG meeting.

2.4 You endorsed the MDDEG's recommendation, and we subsequently raised DCP0037 on 1 October 2008. Following favourable industry impact assessment responses to the DCP, we raised CP1271[25].

[25] You can download copies of the full DCP impact assessment responses from our website.

## 3 Solution

3.1 CP1271 would amend BSCP509 to refer to SVG, rather than PAB, meeting dates. We provided participants with draft redlined changes to the BSCP as part of the CP impact assessment. We didn't receive any comments on the redlining.

3.2 Full details of the fast track timetable are not included in the proposed BSCP509 redlining, as the BSCP does not contain specific dates and refers to an MDD release schedule which we publish on our website. However, the CP proposes to insert an explanatory footnote in Section 3.4 of the BSCP, clarifying that the release schedule will contain different Change Request submission deadlines for new participants. We will produce the actual release schedule as part of the CP's implementation.

## 4 Costs, impacts and implementation approach

4.1 Our implementation costs for CP1271 are 10 man days of effort (equating to £2,200) to:

- Update BSCP509;
- Produce and publish the new MDD release schedule (which will tie the approval process to SVG meetings and include the new fast track option for new entrants);
- Amend the MDD pages on our website; and
- Update our local working instructions.

4.2 We would not incur any additional operational costs, and there are no impacts on any systems or other Configurable Items.

4.3 All industry impact respondents have confirmed that they are not impacted by CP1271, and do not require any implementation lead time. In the CP form we recommended implementation in the June 2009 Release, as this is the next available release for a documentation change. All respondents agree with this approach.

## 5 Industry views on benefits

5.1 We received 15 responses to the CP1271 participant impact assessment, of which 10 agreed with the CP and 5 were neutral.

5.2 Three respondents provided specific comments on the CP. Two respondents agreed that it would be sensible to align the MDD process with SVG meetings. One respondent commented that they supported the change but would have liked more detail on the fast track timetable. We contacted the respondent to clarify the proposed fast track process, and they are happy that this will avoid new entrants having to wait an extra month for their changes to be published in MDD.

5.3 We have provided copies of the full responses in Section 7.

## 6 Conclusion and recommendation

6.1 We agree that CP1271 will improve the efficiency of the MDD change process. Our recommendation is therefore to **approve** CP1271 for implementation as part of the **June 2009 Release**.

 

**IA summary for CP1271 – Align MDD Approval Timescales to SVG Meetings**

| IA history CPC no. | CPC00651 | Impacts | BSCP509 |
|---|---|---|---|

| Organisation | Capacity in which organisation operates | Agree? (Yes/No) | Calendar days required to implement |
|---|---|---|---|
| Western Power Distribution | LDSO/MOA | Yes | Zero – no impact |
| SSE | Supplier/Generator/Trader/Party Agent/Distributor | Yes | Zero – no impact |
| EDF Energy | Supplier, NHH Agent and HH MOP | Yes | Zero – no impact |
| SAIC on behalf of Scottish Power | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | Zero – no impact |
| TMA Data Management | HHDC, HHDA, NHHDC and NHHDA | Yes | Zero – no impact |
| British Energy Direct | Supplier | Yes | Zero – no impact |
| Npower | Supplier, Supplier Agents | Yes | Zero – no impact |
| E.ON | Supplier | Yes | Zero – no impact |
| Siemens Metering Services | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO) | Yes | Zero – no impact |
| Stark Software International | HHDC | Yes | Zero – no impact |
| Gemserv | MRASCo | Neutral | Zero – no impact |
| AccuRead | NHHDC, NHHDA, NHHMOP, HHMOP | Neutral | Zero – no impact |
| CE Electric | LDSO, UMSO | Neutral | Zero – no impact |
| E.ON Energy Services | MOA NHHDC/DA | Neutral | Zero – no impact |
| Independent Power Networks | LDSO, UMSO, SMRA | Neutral | Zero – no impact |

Impact assessment responses

| Organisation | Agree? (Yes/No) | Impact? (✓/X) | Comments | ELEXON's response |
|---|---|---|---|---|
| Scottish Power | Yes | X | Given that SVG currently approve MDD changes it seems eminently sensible to align the MDD approval process with the SVG Meeting dates. | - |
| TMA Data Management | Yes | X | We support the change but regret that there is no clear information on the fast track for new market entrants as currently a new entrant can wait up to 2 months from PAB approval to MDD go live date. | We have spoken to the respondent to clarify the proposed fast track process. They note that the exact timetable will not be produced until during implementation. However, they are happy with the intention of the fast track process, and that this will avoid new entrants having to wait an extra month for their changes to be published in MDD. |
| Stark Software International | Yes | X | Alignment to SVG meeting would seem sensible. | - |

Comments on redlined text

None received.

**Appendix 8 – Detailed Analysis of CP1272 - Use of Appointment and Termination Flows in Unmetered Supplies (UMS)**

# 1 Background

1.1 Suppliers currently submit D0155[26], D0148[27] and D0151[28] flows to the UMSOs. These flows are deemed unnecessary because the UMSO does not require or use this information. The BSC Auditor[29] identified this inefficiency and the Unmetered Supplier Expert Group (UMSEG) have subsequently sought to address the issue via CP1272.

1.2 A concern was raised that if these flows were removed from the process the UMSO would not be aware of any changes in relation to the Unmetered Supply made by the Supplier.

1.3 In order to ascertain industry views regarding the necessity of the flows, ELEXON raised DCP0038 which proposed three potential solutions:

- **Option A**: Remove the requirement for the Supplier to send the three data flows to the UMSO;
- **Option B**: Allow for the flows to be sent from Supplier to UMSO via the Data Transfer Network;
- **Option C**: Keep existing processes.

1.4 The majority of industry impact assessment respondents to DCP0038 favoured Option A:

***'Remove the requirement to send the D0155, D0148 and D0151'.***

# 2 Proposed Solution

2.1 Remove the requirement in BSCP520 for Suppliers to send D0155, D0148 and D0151 flows to UMSOs. This would be on the basis that the necessary appointment data would have already been entered into SMRS by the Supplier and so should be available to the UMSO. This option would remove the onus on the Supplier to send the flow to the UMSOs.

2.2 Include a requirement in BSCP501 for the UMSO to be notified by the Licensed Distribution System Operator (LDSO) of any appointment related changes associated with Unmetered Supply.

2.3 The suggested change will remove the requirement for Suppliers to send data flows that are not required by the UMSO and will ensure that the UMSO is made aware of any changes relating to the Unmetered Supply via the LDSO. This solution will align with current processes followed by the UMSO.

# 3 Impact on ELEXON Operations

3.1 The estimated ELEXON implementation cost is 3.5 man days, which equates to £660.

[26] Notification of new Meter Operator or Data Collector Appointment and Terms
[27] Notification of Change to Other Parties
[28] Termination of Appointment or Contract by Supplier
[29] CP1272 relates to issue A2.1 (for more information refer to page 16 of the DCP0029 Solution Catalogue ).

## 4 Participant Impact Assessment

4.1 We issued CP1272 for participant impact assessment on 09 January 2009 as part of CPC00651. We received 16 responses; of which, 8 agreed, 2 disagreed and 6 were neutral.

4.2 Some Suppliers believe that the current process assisted them in reconciling their information with that of the UMSO. By removing the requirement to send the three data flows there is potential that data inconsistencies could be introduced between the Supplier and the UMSO. ELEXON discussed this with the respondents and highlighted that the UMSOs do not use these data flows at the moment. One respondent indicated that although the requirement will be removed from the current process they would continue to submit these flows in order to maintain an audit trail of their updates.

4.3 Another respondent indicated that their support of CP1272 was contingent on CP1267[30] being approved. CP1267 seeks to amend the validation rules when registering an Unmetered Supplies Operator (UMSO) or Meter Administrator (MA) in Supplier Meter Registration Agent (SMRA).

## 5 Recommendation

5.1 ELEXON's recommendation, based upon the majority support for the change and the anticipated improvement to efficiency, is to:

a. approve CP1272 for inclusion in the June 2009 Systems Release.

[30] Registration of UMSO's and MA's in SMRS

**IA Summary for CP1272 – Use of Appointment and Termination Flows in Unmetered Supplies (UMS)**

| IA History CPC number | CPC00651 | Impacts | BSCP501 and BSCP520 |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in | Agreement (✓/X) | Days Required to Implement |
|---|---|---|---|
| **Central Networks** | Distributor | Yes | 30 |
| **Western Power Distribution** | LDSO / MOA | Yes | - |
| **Scottish and Southern Energy** | Supplier/Generator/ Trader / Party Agent / Distributor | Yes | 0 |
| **EDF Energy** | Supplier, NHH Agent and HH MOP | Yes | 30 |
| **ScottishPower** | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | 90 |
| **CE Electric UK** | LDSO, UMSO | Yes | - |
| **Independent Power Networks** | LDSO, UMSO, SMRA | Yes | - |
| **Power Data Associates Ltd** | Meter Administrator | Yes, subject to | - |
| **British Energy Direct Limited** | Supplier | No | - |
| **NPower Limited** | Supplier, Supplier Agents | No | - |
| **Gemserv** | MRASCo Ltd | Neutral | |
| **TMA Data Management Ltd** | HHDC, HHDA, NHHDC and NHHDA | Neutral | - |
| **AccuRead** | NHHDC, NHHDA, NHHMOP, HHMOP | Neutral | - |
| **E.ON** | Supplier – NORW, EELC, EENG, EMEB, PGEN | Neutral | 91 |
| **E.ON UK Energy Services Limited** | MOA NHHDC /DA | Neutral | - |
| **Siemens Metering Services** | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO). | Neutral | - |

Impact Assessment Responses

| Organisation | Agree? | Comments | Impact? | Days to Implement | ELEXON Comments |
|---|---|---|---|---|---|
| **Central Networks** | Yes | **Impact on Organisation's Systems and/or Processes?** Alteration of processes and procedures | Yes | 30 | n/a |
| **Western Power Distribution** | Yes | **Comments:** Reflects our current process. | No | - | n/a |
| **EDF Energy** | Yes | **Comments:** This change addresses an issue that has been a concern for sometime. We feel that this removes issues with UMSO flows that can be mislaid/ignored as not sent via DTN.<br><br>**Impact on Organisation's Systems and/or Processes?** Supplier<br><br>**Impact on Organisation** Processes | Yes | 30 | n/a |
| **ScottishPower** | Yes | **Comments:** ScottishPower strongly support the CP as it would remove the obligation to send and receive these flows which are superfluous to our day to day operation. As an UMSO we do not rely on receiving these flows as we acquire notification via MPRS.<br>As a Supplier it is our experience that few if any UMSOs require these flows and as such the sending of them is not required.<br><br>**Impact on Organisation's Systems and/or Processes?** Yes<br><br>**Capacity in which Organisation is impacted** Supplier, Distributor, NHHDA, NHHDC<br>**Impact on Organisation** Changes to internal processes<br><br>**Would implementation in the proposed Release** | Yes | 90 | n/a |

| | | | | | |
|---|---|---|---|---|---|
| | | **have an adverse impact?** No | | | |
| **Power Data Associates Ltd** | Yes subject to | Subject to the changes proposed in CP1267 being agreed by industry.<br><br>The alternative approach to CP1267 could work for UMSO, as this currently has a one-one relationship with the LDSO – although anything can change!<br><br>The CP1267 alternative approach is not robust for MAs. SSE's comment on CP1267 indicates that the MPAS system would need to be reinstated. "...St Clements' estimate of 7.5k-10k to reinstate the processing of role codes 3 and 4 in MPRS. ...". The implication was that the functionality was there, but was taken out, presumably in error. When ECOES was reviewed for PDAL customers, there were some suppliers who had successfully updated MPAS with PDAL, yet PDAL has only ever been defined in MDD as MA, never as an MOP. So it must have been changed recently.<br><br>The impact of not recording the correct MA in MPAS is that on change of supplier the new supplier would have to find the MAs identity from another source. This is not robust, I have recently been aware of a customer who had advised the supplier of the appointed MAs (there were many MPANs) and the supplier failed to appoint the correct MA, causing that Supplier/customers a significant delay in obtaining settlement data.<br><br>One reason this issue was raised was that one UMSO was hesitant to provide us with customer Inventories because PDAL had not been updated into MPAS. A reasonable confidentiality check by the UMSO. Which we clearly resolved by emails between the customer, the UMSO and ourselves. But all these issues take time and effort, and delay providing a quality service to customers, and potentially failing to provide data into settlements. With | - | - | We discussed this with the respondent and they indicated that they were supportive of the change, however, they would like to see the outcome of CP1267 before supporting this CP. |

| | | | | | |
|---|---|---|---|---|---|
| | | customers wondering why the industry can't get it sorted! The comment from one respondent about how does the LDSO know whether to expect a MOP or a MA, seems to forget that the MPAS system holds the Measurement Class. On loading the details it can simply review the Measurement Class, if MC=D then participant should be an MA (role code = 4) , if A, C or E then MO (role code = M), if MC=C then should be UMSO (role code = 3). This logic will already be there to a degree, and just needs enhancing for MA.<br><br>Measurement Class Id Measurement Class Description<br>A Non Half Hourly Metered<br>B Non Half Hourly Unmetered<br>C HH metered in 100kW Premises<br>D Half Hourly Unmetered<br>E HH metered not 100kW Premises<br><br>It is frustrating that the LDSOs can't reinstate the functionality for 7.5-10k across the industry (assuming this figure is spread over 14 LDSOs less than £1k each). Resolving the changes to CP1267 to ensure MPRS holds the correct participant ID is essential to progression of this change. If the right data is not in MPRS then the LDSO cannot inform UMSO of agent appointments. | | | |
| **British Energy Direct Limited** | No | **Comments:** The proposed solution does not outline the procedure which would prompt the UMSO to check the SMRS view, and forward the un-metered supply certificate. The supplier also needs confirmation from the MA of appointment.<br><br>In sending the D0155, D0148 & D0151 flows to the UMSO it allows the supply to trigger the UMSO for a certificate and acknowledgement from the MA.<br><br>Supplier will be reliant upon the UMSO checking the SMRS view removes the prompt from the supplier to confirm | | - | We contacted the respondent and discussed the various issues that where raised.<br><br>The respondent agreed that the UMSO would be made aware of any changes to Unmetered Supply by the LDSO.<br><br>The respondent believed that the current process assisted them in reconciling their information and ensuring that a robust set of data existed between the UMSO and the |

| | | | | | |
|---|---|---|---|---|---|
| | | that the view is correct. Attachment B does not outline the timescales to which the UMSO is expected to act. By aligning metered and unmetered processes by including UMSO/MA in the DTN would simplify the processes.<br><br>**Impact on Organisation's Systems and/or Processes?** Yes<br><br>**Capacity in which Organisation is impacted** Supplier<br><br>**Impact on Organisation** Process | | | Supplier. We informed the respondent that although the requirement for Suppliers to submit this information to the UMSO would be removed, this would not prohibit them from continuing to submit this data.<br><br>The respondent also indicated that they would prefer to have the relevant data included within the DTN as this would mitigate any potential risk of data inconsistency.<br><br>We informed the respondent that we had previously asked industry within DCP0038 whether they would prefer to have the data included on the DTN, this option was not seen as a favourable option. We therefore did not go ahead with this option. The respondent was happy with this explanation. |
| **NPower Limited** | No | **Comments:** The D0155 data flow includes contractual references to supplier/UMSO contractual arrangements. The response to this flow (D0155) is acceptance of the contractual arrangements by the UMSO. The proposal introduces a third party, the LDSO, into the data transfer process and would make it more difficult to identify points of failure. If the UMSO wishes to utilise the MPAS data as a method of appointment should they not follow similar processes to that of the Data Aggregator. The appointment flow is via MPAS but the confirmation of contractual agreement is still via data flows external to MPAS flows. I.E. the D0153 and the D0011.<br><br>How are contractual agreements to be managed before such a change is agreed. The UMSO is an agent of the supplier and some form of process is required to confirm | Yes | | Npower are wary of relying on SMRS to provide the UMSO with the information as the data in SMRS could be incorrect. Npower would prefer to retain the flows so that they can send a communication to the UMSO and then guarantee that they will get either an acceptance or rejection.<br><br>We explained that even under CP1272 they could still send their emails to the UMSO, but UMSOs would need a specific obligation to respond in a certain way.<br><br>Npower have noted that there would be costs incurred for system changes arising from this CP, but have not been able to |

| | | | | | |
|---|---|---|---|---|---|
| | | that the 'appointment has been accepted and in accordance with a form of contractual agreement.<br><br>Currently NPower systems automatically send an email to the UMSO in place of the D155, D151 and D148 flow and there may be a cost to remove this functionality.<br><br>**Impact:** System and Process Impact | | | quantify these costs. In particular npower queried why the changes proposed in 3.5.10 are necessary (obligating a Supplier to start sending a D0170 for NHH COA events to the old DC). This would need a system amendment as currently for UMS we rely on the New NHH DC to send this flow (as per the current BSCP). This does bring BSCP520 in line with BSCP504, so npower do not disagree with this revision but they cannot see what relevance this has with CP1272.<br><br>Npower queried whether the changes to sections 3.5.10 and 3.7 were necessary for this change, ELEXON confirmed that the changes are necessary to give effect to the CP.<br><br>Npower noted our response but continue to disagree with this CP. |
| **E.ON** | Neutral | **Impact on Organisation's Systems and/or Processes?** Yes<br><br>**Capacity in which Organisation is impacted:** Supplier<br><br>**Impact on Organisation :** System<br><br>**Comments:** System change will presumably be required to stop these flows being output automatically for UMS. Further analysis is needed to clarify level of change required. | yes | 91 | n/a |

Comments on Redline text

No comments received

**Detailed Analysis of CP1273 – Changes to the scope of CoP10 to cover current transformer operated Meters**

# 1 Introduction

1.1 E.ON raised CP1273 'Changes to the scope of CoP10 to cover current transformer operated Meters' on 6 January 2009.

1.2 Code of Practice (CoP) 10 'Code of Practice for Whole Current Metering of Energy via Low Voltage Circuits for Settlement Purposes' was developed by the Advanced Metering Expert Group to facilitate the introduction of Automatic Meter Reading and will apply to Non Half Hourly (NHH) and elective Half Hourly (HH) metering[31].

1.3 CoP10 was approved by the Panel at its meeting in November 2008 for implementation in the February 2009 BSC Release and the Supplier Volume Allocation Group (SVG) has been delegated the authority to approve any subsequent changes to CoP10.

1.4 CoP10 will apply to whole current[32] (WC) Meters only and was developed on the basis that Suppliers would be able to provide a CoP5 compliant Meter for current transformer[33] (CT) operated sub-100kW sites opting to trade in the HH market.

1.5 Changes to Supplier Licences are due to become effective in April 2009 which, when implemented, will mean that Suppliers will be required to install advanced Meters for customers within Profile Classes 5 to 8. Since Profile Classes 5 to 8 customers will include sites which require CT operated Meters in the sub-100kW market, the only option available to Suppliers will be to use a more expensive CoP5 compliant CT operated Meter to provide the advanced functionality required by the new licence condition.

1.6 CP1273 seeks to widen the scope of CoP10 to include CT operated Meters so that Suppliers will have a choice about whether or not to install a CoP5 CT operated Meter (which is more expensive) or a CoP10 CT operated Meter. CoP10 will apply for sites where demand is below the 100kW threshold for mandatory CoP5 (and above) metering.

# 2 Solution

2.1 CP1273 proposes to add the relevant CT related requirements from CoP5 into CoP10 and remove the references to whole current metering in CoP10. Attachment A to CP1273 shows the redline changes required for CoP10 to facilitate this change. The new requirements for CoP10 will include:

- Specifying the minimum CT accuracy class (i.e. class 0.5);

[31] Elective HH Metering is where a customer chooses to install HH Metering but HH Metering is not required for the purposes of Settlement as the consumption is below the mandatory HH threshold for Imports.

[32] In a whole current Meter all of the energy supplied to (or exported from) a premises passes directly through the Meter and not via a separate current transformer (s). Whole current Meters are usually limited to passing 100 Amps per supply phase. For a supply voltage of 240V per phase this represents approximately 24kW for a single phase supply or 72 kW for a 3 phase supply.

[33] A current transformer operated Meter measures the energy supplied to a premises using one (single phase supply) or more (2 or 3 for a 3 phase supply) current transformers. A current transformer 'scales down' the 'primary current' flowing in the cables to the premises to produce a proportional 'secondary current', which then feeds the Meter. The Meter therefore needs to be programmed (or designed) to 'know' the 'primary to secondary', or current transformer, ratio in order to 'scale up' the energy the Meter actually measures, to derive a figure for the energy delivered to (or exported from) a premises.

- Providing fusing and testing facilities to allow CT operated Meters to be replaced/worked on without disconnecting customers; and
- Specifying that Meters shall be able to be set to, display and download (during interrogation) the appropriate primary-to-secondary ratio of the CT that is/are installed in conjunction with the Meter.

2.2 In addition to these changes to CoP10, BSCP601 'Metering Protocol Approval and Compliance Testing' will need to be changed to make the relevant CT related changes to CoP10 part of the compliance testing process. By doing this, manufacturers can submit CT operated Meters for compliance testing and have meters approved as CoP10 compliant. The redline changes required for BSCP601 are included as Attachment B to CP1273.

2.3 These changes will allow Registrants to choose between a CoP10 compliant Meter or a CoP5 compliant Meter for CT operated sites where demand remains below the mandatory 100kW threshold for HH metering. Where a Metering System becomes a '100kW Metering System' the Registrant will have to ensure that CoP5, or above, metering is installed.

## 3 Impact on ELEXON Operations

3.1 Our Change Delivery department will need to deal with new applications for CoP10 compliance testing of CT operated Meters. The estimated CP implementation cost is 4 ELEXON man days which equates to £880.

## 4 Participant Impact Assessment

4.1 We issued CP1273 for participant impact assessment on 9 January 2009 as part of CPC00651. We received 17 responses; of which, 11 agreed, 2 disagreed and 4 were neutral.

4.2 One respondent, who was neutral to the proposed change, suggested that, because the Supplier Licence conditions to install advanced metering become effective on 6 April 2009 for Profile Classes 5 to 8, the normal change process should be ignored to allow for an implementation date for CP1273 of 6 April 2009. The respondent also suggested that alternatively, the change could be included in the February 2009 BSC Release of CoP10 (but indicating that CT requirements for CoP10 will become effective on 6 April 2009).

4.2.1 It is not possible for a Change Proposal to be implemented before it has been approved. A decision on CP1273 will not be made until 3 March 2009 by the SVG. Therefore we cannot implement this change in the February Release.

4.2.2 We are aware of a desire from participants to align the release date of CP1273 with the Supplier licence changes scheduled (but not guaranteed to be approved) for 6 April 2009. We have confirmed that the Code Subsidiary Document (CSD) changes for CP1273 could be carried out alongside the CSD changes for P230 'Enabling Interoperability through the use of CoP10 and CoP5 Metering', if approved (noting that CP1273 is not contingent upon P230 being approved). P230 is scheduled for implementation in the June 2009 BSC Systems Release, or later if no decision is taken in time for June. We therefore recommend that the release date for CP1273 be aligned with P230 CSD changes, where possible. Therefore CP1273 should be implemented in the June 2009 BSC Systems Release.

4.2.3 Two respondents disagreed with the proposed change and continue to believe that CP1273 should be rejected. These respondents' concerns are tabulated below, along with the response to their queries:

| | Respondents' Comments | ELEXON's Comments |
|---|---|---|
| 1. | Both respondents argued that extending the scope of CoP10 to CT operated Meters would mean that on Change of Measurement Class (CoMC) a CoP10 CT operated Meter would need to be replaced by a CoP5 CT operated Meter. | We agree that on CoMC a CoP10 Meter would need to be changed unless the Meter also complies with CoP5 (or above). The process of CoMC would be simpler if a CoP5 Meter was already in place. If CP1273 is approved, Registrants will make a commercial decision to install a CoP5 or CoP10 Meter. In making their decision Registrants will need to weigh the additional costs of a CoP5 Meter (compared to a CoP10 Meter) against the costs of a Meter exchange in the future. |
| 2. | One respondent argued that a major driver behind limiting CoP10 to WC Meters was the practical constraints of keeping the meter below 100kW. The respondent believes that the proposal to use CoP10 Meters in the 72kW to 100kW range appears difficult to police and there would be no practical barrier to prevent the customers load going above 100kW. The respondent believes that, under CP1273, a new process would have to be introduced into BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS' to identify 100kW Metering Systems so that the need for a Meter change could be identified.<br><br>This respondent also suggested that no-one had considered changing CoP5 to remove non-Settlement requirements such as relays to address the economic drivers behind the CP so that cheaper CoP5 CT operated Meters could be used instead. | We agree that by limiting the scope of CoP10 to WC this issue would not arise. As noted, Registrants would need to consider the risk and cost/benefit of installing a CoP10 CT operated Meter in a site where the Metering System could become a '100kW Metering System'.<br><br>It is clear that no process currently exists in BSCP502 (the HHDC BSCP) to identify when a HH Metering System breaches the 100kW threshold. However, Suppliers are required to have mechanisms in place that identify a breach of the 100kW threshold and we consider that this is a wider issue than CP1273.<br><br>For NHH settled data, BSCP504 (the NHHDC BSCP) has a process to report such breaches to Suppliers via the P0028 '100kW Demand Report' flow.<br><br>We understand that removing requirements from CoP5 could help to drive the cost of CoP5 metering down. However, CP1273 is a solution which aimed at the elective HH market and changes to CoP5 would impact the mandatory HH market as well. |
| 3. | One respondent argues that CP1273 reverses the rationale behind the creation of CoP10. The rationale is believed to be that a lower standard of metering and Data Collector (DC) processes would not be appropriate for CT operated sites (72 to 100 kW). The respondent believes that greater | We agree that there are more risks associated with CT metering. For example Meters may be programmed with the incorrect CT ratio or pulse multipliers could be incorrect. These risks already exist for CT operated Meters. However, ensuring pulse multipliers are correct will |

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| | assurance is required that CT operated Meters are recording accurately; for instance, the re-introduction of the assurance measures that were removed from BSCPs under the original CoP10 CP, CP1261 'Introducing Metering Code of Practice 10 to facilitate smart metering in the Half Hourly (HH) market' | become increasingly important as more sub-100kW Half Hourly data is provided for Settlement. The assurance processes referred to by the respondent are the proving test exemptions for CoP10 Metering Systems in BSCP502 and BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'. Participants should be aware of the potential increased risk involved in exempting CoP10 CT operated Metering Systems from proving test requirements and may wish to re-instate them. However, it may be difficult to differentiate between CT operated and non CT operated CoP10 metering to be able to treat them differently, as the respondent points out below; |
| 4. | One respondent suggested that CP1273 would create significant problems for HHDCs to be able to identify sites with CT operated Meters traded as HH elective and is totally reliant on the Meter Operator Agent (MOA) populating the J0454 'CT ratio' data item (an optional field) in the D0268 'Half Hourly Meter Technical Details' to determine whether the site is CoP10 CT operated or CoP10 WC. The respondent believes that the CP could create two different obligations in the same CoP and that it is unacceptable for DCs to carry out different validation checks on such metering. The respondent recommends that if the sentiment of the change is to be fulfilled then a new CoP would need to be created. | We sought clarification from the respondent as to why they believed the CP might create two obligations in one CoP and two different validation checks for DCs. The respondent confirmed that they meant it could be unclear which CoP was the relevant CoP for CT operated Meters in the sub-100kW market. We believe that CoP10 is quite clear in its scope that it is limited to the elective HH market (and the NHH market) and therefore should not be confused with CoP5 applications. |
| 5. | One respondent argues that the associated changes to BSCP502 for CP1261 excluded CoP10 WC Meters from proving tests on the grounds that a major cause of Settlement error was due to incorrect pulse multipliers, which in a WC Meter would be 1. Increasing the scope of CoP10 would need this to be reconsidered, which this CP does not address.<br><br>The other respondent who disagreed also believes that the assumptions and assertions made by the CoP10 working group may not be valid against CT metering; such as the need not to conduct proving tests. | We believe that the risk of not proving Metering Systems for CoP10 post CP1273 is increased but is marginal based on the maximum energy involved. We would support further discussion of the conclusions of the CoP10 working group on the assumptions and risks involved however, we are mindful of the desire from some Parties to have the enduring solution proposed by CP1273.<br><br>As noted, we agree that there are more risks associated with CT metering and that the industry may wish to look into the costs/benefits of re-instating proving tests for CoP10 metering. One mitigating factor is that any associated errors would be limited to customers with CT metering in the sub 100kW |

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| | | market as a change of Meter (to a CoP5, or above, Meter) would be required and proving would need to be carried out as a result of such a change. One way Registrants could reduce risk would be to request proving tests for CT operated CoP10 Meters. |
| 6. | One respondent argued that since the metering CoPs are not retrospective there will be existing metering in the 70-100kW range with HH capability that meet the Supplier Licence obligations. | We believe that this comment has more to do with P230 and the proposal to mandate the use of CoP10 or 5 metering for Profile Classes 5 to 8 customers. This change provides more options for metering in order to settle elective HH data in the HH market. If P230 is approved then existing installed Meters with a 'half hourly' capability, which do not comply with CoP10 or CoP5 (or above), could not have their 'half hourly' data used for HH Settlement purposes despite meeting the requirements for the Supplier Licence conditions relating to advanced metering. |
| | One respondent suggested that consideration should be given to the work of the 'Absent and Erroneous Reactive Power Data' working group in relation to providing interval data for Reactive Energy to Licensed Distribution System Operators (LDSO) for CT metering. | We support consideration of the work of the 'Absent and Erroneous Reactive Power Data' working group in relation to providing interval data for Reactive Energy to Licensed Distribution System Operators (LDSO) for CT metering and we will ensure that members of the group are aware of CP1273's progression. However, CPs are assessed against the current base line. Further changes may become appropriate in time. |

4.2.4 We received a late response for CP1273. The respondent supports the change as in their view it is much more sensible to apply the same standard of metering below the mandatory threshold regardless of the type of metering (WC/CT) a site has.

# 5 Recommendation

5.1 There is a clear majority support for CP1273. We have noted that concerns regarding exempting all CoP10 metering (CT or WC) from proving tests (with the potential Settlement risks involved) are mitigated for, or can be addressed through other change. Therefore we recommend that the SVG:

a. Agree the suggested amendments to the redline text changes for CoP10 and BSCP601; and

b. Approve CP1273 for the June 2009 BSC Systems Release, noting this is likely to align with P230 (if approved).

IA Summary for CP1273

| IA History CPC number | CPC00651 | Impacts | CoP10, BSCP601 |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in | Agree? Yes/No | Days Required to Implement |
|---|---|---|---|
| **Western Power Distribution** | LDSO / MOA | Yes | 30 |
| **Scottish and Southern Energy** | Supplier/Generator/ Trader / Party Agent / Distributor | Yes | - |
| **ScottishPower** | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | Yes | - |
| **TMA Data Management Ltd** | HHDC, HHDA, NHHDC and NHHDA | Yes | - |
| **British Energy Direct Limited** | Supplier | Yes | - |
| **AccuRead** | NHHDC, NHHDA, NHHMOP, HHMOP | Yes | 90 |
| **E.ON** | Supplier – NORW, EELC, EENG, EMEB, PGEN | Yes | 90 |
| **E.ON UK Energy Services Limited** | MOA NHHDC /DA | Yes | - |
| **Siemens Metering Services** | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO). | Yes | 30 |
| **SSIL** | HHDC | Yes | |
| **IMServ Europe Ltd (late response)** | HHDC, MOA | Yes | - |
| **Association of Meter Operators** | Trade Association for Meter Operators | No | - |
| **NPower Limited** | Supplier, Supplier Agents | No | - |
| **Gemserv** | MRASCo Ltd | Neutral | |
| **EDF Energy** | Supplier, NHH Agent and HH MOP | Neutral | 30 |
| **CE Electric UK** | LDSO, UMSO | Neutral | |
| **Independent Power Networks** | LDSO, UMSO, SMRA | Neutral | - |

Detailed Impact Assessment Responses

| Organisation | Agree? | Comments | Impact? | ELEXON Response |
|---|---|---|---|---|
| **Western Power Distribution** | Yes | **Comments:** Documentation changes | Yes | Noted. |
| **ScottishPower** | Yes | **Comments** ScottishPower are minded to support the proposed change. | Yes | Noted. |

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| | | **Capacity in which Organisation is impacted :** MOA, Supplier, possible process changes | | |
| **E.ON UK Energy Services Limited** | Yes | **Comments:** This change would give expanded opportunity to use alternate suitable metering within the 70kw plus market profile class 5-8 | No | Noted. |
| **Siemens Metering Services** | Yes | **Impact:** minor process changes<br><br>**Would implementation in the proposed Release have an adverse impact?** No adverse impact | Yes | Noted. |
| **SSIL** | Yes | **Comments:** Increases the potential use of low cost CoP10 metering and extends the HH elective market hence increasing the proportion of HH related data into Settlement | No | Noted. |
| **Association of Meter Operators** | No | **Comments:** The work to develop CoP10 considered the threshold for CoP10. It was agreed to limit the requirement to whole current meters. This gave the assurance that the metering would not go above the 100kW threshold – whole current meters are physically limited to passing 72kW.<br><br>The associated changes to BSCP502 allowed for CoP10 meters not to require a proving test. This was a cost reduction recognising that the major cause of settlement error was due to incorrect pulse multipliers – in a whole current meter the pulse multiplier would always be one. Increasing the scope of CoP10 to include CT meters would require this to be reconsidered, and changed. This CP does not address this issue.<br><br>The other major driver was the practical constraint of keeping the meter below 100kW. The proposal of using CoP10 meters in the very narrow band of 70 to 100kW appears difficult to police.<br><br>There is no practical barrier that will stop the customer load increasing above 100kW. Once above 100kW a CoP5 meter will be required (even with this change). This will involve the DC identifying that the customers consumption has increased above 100kW and requiring the MO/Customer to replace the meter. This adds cost to the MO/Customer. *The requirement for the DC to identify over 100kW demand from a CoP10 metering installation would need to be | | We agree there are risks associated with extending the scope of CoP10 to CT metering. We spoke to respondent to clarify what they meant by 'The requirement for the DC to identify over 100kW demand from a CoP10 metering installation…' *. The respondent confirmed that by only allowing CoP10 to cover WC Meters the question of DCs needing to identify '100kW Metering Systems' would not come up for CoP10 registered sites – demand would be limited to 72kW.<br><br>It is clear that no process currently exists in BSCP502 (the HHDC BSCP) to identify when the 100kW threshold is exceeded in order for a Registrant to know if the criteria are met for a Metering System becoming a '100kW Metering System'.<br><br>For NHH Settled data, BSCP504 (the NHHDC BSCP) has a process to report 100kW threshold breaches to Suppliers via the P0028 '100 kW Demand Report' data flow. Where 3 such reports meet the criteria for a '100kW Metering System' then a HH capable Meter |

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| | | added to BSCPs as a new activity. It can be assumed this would be added into the Supplier PARMS reporting and fine for over 100kW customer without CoP5 metering.<br><br>What does not appear to have been considered is to leave CoP10 as current defined (whole current only) and to consider amending CoP5 to remove any 'non-settlement' requirements (such as number of relays). This may satisfy the commercial drivers behind this CP, without any loss of settlement accuracy.<br><br>It should also be remembered that the Metering CoPs are not retrospectively applied. So existing metering in the 70-100kW range with HH data capability meets the Supplier licence obligations. | | (CoP5 or above) should be fitted (or enabled) and metered data should be Settled HH. The Measurement Class Id should also be changed to 'C'.<br><br>Suppliers must have mechanisms in place (for electively Settled HH metered data) to be able to respond to such Code defined occurrences in the HH market, in order for similar processes to take place, e.g. CoMC from 'E' (elective) to 'C' (mandatory).<br><br>We suggest that this is a bigger issue than the CP itself and that should a new process need to be defined in BSCP502 then the 'From' and 'To' entities for the P0028 flow in the SVA Data Catalogue would be impacted and any requirement to monitor performance related to sending a P0028 flow would impact PARMS. |
| **NPower Limited** | No | **Comments:** We appreciate the sentiment of the change in attempting to apply low cost metering in the Advanced market but based on the arguments below we need further assurance that has not been given in the proposal.<br><br>We **reject** this CP on the basis it does not go far enough to address the 'risk' associated to CT metering which is mitigated through Commissioning and Proving; both of these were excluded from the original CoP10. One of the advantages of CT metering being mandated to CoP5 only is that on a mandatory COMC the meter would not necessarily need to be changed. The extension of CoP10 metering to include CTs may remove this potential benefit as the meter would have to be changed (although should be weighed against the cost of superior metering); under the existing arrangement CoP5 metering would be already installed on the site making the switch to HH much easier from a metering perspective. | Yes | We have spoken to the respondent who confirmed that, while they agree in principle with the CP, they would like to get Parties together in a meeting or via a conference call to discuss the implications behind extending the scope of CoP10 before agreeing to support this type of change.<br><br>We agree that there are risks associated with CT metering that may need to be looked at. |

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| | | It also completely reverses the rationale behind the creation of CoP10 in the first instance - i.e. that lower standard metering and DC processes would not be sufficient for recording CT metered sites. More needs to be done to provide assurance that CT metering is recording accurately through the re-instating of, and potentially creation of new, processes removed from BSCPs under the original CoP10 before CoP10 can be extended to include CT metering.<br><br>Furthermore, it creates significant problems for the HHDC to be able to identify CT sites traded as HH elective and is entirely reliant on the MOA populating the CT Ratio field in the D0268 to determine whether the site is CoP10 CT or CoP10 Whole Current. Essentially this CP could create two conflicting obligations in the same Code of Practice. This is not an acceptable position if the DC is required to conduct different validation checks on this metering. We would recommend that if the sentiment of this CP is to be fulfilled that a new Code of Practice would need to be created.<br><br>Additional consideration should be given to the Reactive working group and how these requirements would fit into the proposed red-line of CoP10, if required (necessary to realise the LDSO wish to receive reactive interval data for CT metering).<br><br>Finally, CoP10, including the assumptions and assertions made by the CoP10 working group, were accepted as valid when CoP10 was approved for release. It is evident that further work is required in light of recent changes (P230) but these requirements need to be more considered than simply extending CoP10 to include CT metering - the assumptions and risks concluded by the group should be re-visited before changes to the CoP10 document are progressed.<br><br>**Impact on Organisation** Process | | The respondent clarified that they meant it would be unclear to market participants which CoP (CoP10 or CoP5) would be applicable to CT operated sub-100kW sites.<br>We note however that the scope of CoP10 clearly limits its application to the elective HH market. |
| **EDF Energy** | Neutral | **Comments:** If this is agreed the implementation date of this CP is June 2009. PC 5-8 mandate comes into effect from 6th April 2009. This gives a problem if a CT meter has to be changed in this period. Our assumption is that a MOP would be forced to install CoP5 metering. However, we feel that Elexon should be more flexible to | Yes | Noted.<br><br>We have confirmed internally that CP1273 could be implemented in time for 6 April 2009 to coincide with the scheduled effective date |

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| | | meet market requirements and allow for an implementation date of 6th April 2009 for this version of CoP10. There are precedences for such releases under MRA and as such we feel that Elexon should allow a CoP10 release on 6th April to enable MOPs to operate at this time on how they would do from June 2009 onwards and to support required government legislation. If that is not possible then we would request inclusion in February release with a change included in CoP10 to indicate that for CT metering new version should only be utilised from 6th April 2009 and until that time version 1.0 should be used. This is slightly messy but we feel that we must ensure that enduring process for CT metering changes in PC 5-8 is available from 6th April 2009.<br>If neither of these are possible we would like to understand how as NHH MOP we can fit CoP10 meters fro CT metering from 6th April without any issues as this is enduring solution for this metering.<br><br>**Impact on Organisation's Systems and/or Processes?** NHH MOP<br><br>**Impact on Organisation** Processes<br><br>**Implementation** We are concerned that two different sets of rules might need to be introduced due to Elexon release schedules and would recommend that this is not the case. | | of the new Supplier licence conditions for advanced metering.<br><br>We have also confirmed that the CSD changes for CP1273 could be carried out alongside the CSD changes for P230, if approved (noting that CP1273 is not contingent upon P230 being approved). P230 is scheduled for implementation in the June 2009 BSC Systems Release, or later, if no decision is taken in time for June. We therefore recommend that the release date for CP1273 be aligned with P230 CSD changes, where possible. Therefore CP1273 should be implemented in the June 2009 BSC Systems Release. |
| **Late Response** | | | | |
| **IMServ Europe Ltd** | Yes | As a Meter Operator which is active in the Profile Class 5 to 8 market, IMServ welcomes this CP as a way to offer customers/Suppliers with CT operated meters a more economic to the solution to the new Supplier Licence condition which becomes effective in April 2009. In reality the boundary between WC and CT operated meters is not as clear cut as the diagrams in the "Justification for Change" part of this CP implies (ie 72kW). For example there are a lot of "large terminal" WC meters in existence which are rated at 160A and could even exceed the mandatory HH threshold of 100kW (115kW). On the other extreme there are some CT operated meters with 100/5 CTs | No | Noted. |

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| | | which have the same capacity as WC meters. In our view it would be much more sensible for the same standard of metering (CoP10) to apply to all customers below the mandatory HH threshold regardless of which type of metering (WC/CT) of metering they have. | | |

Comments on redlining

No comments were received

**Appendix 10 – Detailed Analysis of CP1274 – Transfer of Meter Technical Details**

# 1 Summary

1.1 Scottish and Southern Energy raised CP1274 on 18 December 2008, behalf of the Advanced Metering Expert Group, who have developed it as part of the Advanced Metering Operational Framework: Profile Classes 5 to 8.

1.2 The purpose of the framework is to facilitate effective market operation and interoperability for Profile Classes 5 to 8. This change will facilitate interoperability on a Change of Supplier where the new Supplier wishes to appoint new agents, as the agents will be able to read the meter only if they have the required communications and password information.

1.3 The solution proposed is to place an obligation on Meter Operators (via BSCP514 and BSCP504) so that the transfer of Meter Technical Details is required to include communications and password data for remotely read meters.

# 2 Why Change?

2.1 Problem

2.1.1 The NHH Meter Technical Details (D0150) flow does not contain all the required data items for advanced metering. Additionally, there is no BSCP requirement to transfer communication and password details, irrespective of whether the D0150 supports this information (although agents are currently transferring this information through other means).

2.1.2 On change of agent, this can result in the new agent receiving Meter Technical Details via the Data Transfer Network (DTN), but not receiving (by other means) sufficient data to read the meter remotely. This can lead to register mapping issues and to further information about the meter having to be exchanged through alternative, less efficient methods. The increased number of advanced meters will make a process relying on communication outside of the DTN difficult to manage.

2.2 Related Changes

2.2.1 This change is related to (but not contingent on) Modification Proposal P230 that requires sites affected by the change to the Supplier licence to be metered using CoP5 or CoP10 compliant metering.

2.2.2 The Issue Resolution Expert Group (IREG) is currently addressing changes to the MRA DTC. These changes will support the transfer of the required data and ensure consistency within the industry.

# 3 Solution

3.1 An obligation should be placed on Meter Operators (via BSCP514 and BSCP504) to require the transfer of Meter Technical Details to include communications and password data for remotely read meters.

3.2 The obligation will be phrased to include all ‘appropriate’ data items as commercial arrangements may be in place that makes some of the items inappropriate to transfer e.g. SIM cards. The changes will be the minimum necessary to make the NHH MTDs fit for purpose. In the period

 

between the MTD changes being established and being implemented, guidance will be issued as to what items should be transferred and in what format.

3.3 Redline text showing these changes is available in attachments A1 and B1.

## 4 Intended Benefits

4.1 If an agent does not have sufficient details to read the meter actual data will not enter Settlement.

4.2 This change has been developed as part of the Advanced Metering Operational Framework: Profile Classes 5 to 8. The purpose of the framework is to facilitate effective market operation and interoperability for Profile Classes 5 to 8. This change will facilitate interoperability on a Change of Supplier where the new Supplier wishes to appoint new agents as the agents will be able to read the meter only if they have the required communications and password information.

## 5 Industry Views

5.1 We issued CP1274 for participant impact assessment on 09 January 2009. We received 18 responses, of which 13 agreed, 1 disagreed and 4 were neutral.

5.2 Proposed Change to the BSCP514 Redlining

5.3 The one respondent who disagreed with change, did so because they think that the BSCP514 wording would benefit from including a reference to the data needed by MOAs to remotely configure meters. ELEXON agrees that this change would be beneficial and that it is a non-material clarification to the CP1274 solution, which SVG can agree without a new impact assessment (in accordance with step 3.5.2 of BSCP40). We recommend that the SVG agree this amendment to the redline text. Details of the amendment to the redline text are available in the responses table below.

5.4 Initially, the respondent suggested that the BSCP504 wording should be updated as well. We have discussed this with the respondent, and they now agree that the wording in BSCP504 shouldn't be updated. Details of the reasoning behind this are included in the tables at the end of this Assessment Report. The respondent is now happy with this Proposal and it addresses the issues we raised and agrees with the change.

5.5 Implementation Date

5.6 Some respondents were not clear on the timescale for the release of the new licence condition and the DTN solution. There was also confusion around what CP1274 does and the work being done at the special IREG. Thus there appear to be several suggested implementation dates for CP1274. ELEXON has explained to the respondents that the intention of CP1274 is to place an obligation on NHHDCs and MOAs to transfer communications and security details as part of the Meter Technical Details. CP1274 specifies "what" needs to happen. The special IREG changes will specify "how" it should happen – i.e. will provide a mechanism for transferring the communications and security details.

5.7 AMR meters are already being installed in large numbers and communications details are already being transferred between MOAs and NHHDCs by manual methods, this will need to continue with the new licence condition coming into effect on 6 April 09. The interim solution is now in place via MRA Working Practice 147 (click here to refer to the MRA Change Proposal).

5.8 This interim mechanism will transfer the communications and security details until November 2009, when DTN solution will be available. The BSCP change could be made prior to the DTC change, because the BSCP requirements could be met by an interim solution, developed by the Special IREG. All respondents are now happy for the CP to be targeted for June 09 Release.

# 6 Business Case

6.1 Costs

6.1.1 The estimated ELEXON implementation cost is £400.

6.2 Savings and Benefits

6.2.1 The respondents believe that CP1274 will:

- help facilitate the smooth operation of advance metering and ensure that the appropriate details are exchanged between Parties and Agents as and when necessary;
- help facilitate the developments being pursued at the MRA IREG forum as and when they are introduced; and
- reduce the incidents of faults and site visits for the MOA as a result of missing meter communications details.

# 7 Implementation Approach

7.1 The requirement to transfer appropriate communication and password information for remotely-read Metering Systems will facilitate interoperability following the implementation of the proposed mandate in the licence conditions currently due to take effect on 6 April 2009.

7.2 As described above, the Special 'Issue Resolution Expert Group' (IREG) would develop the changes to the Data Transfer Catalogue (for Nov 09) to define what these details should be.

7.3 Therefore we recommend that CP1274 is implemented in June 2009.

# 8 Recommendations

8.1 Based on majority support from industry, and that CP1274 will help facilitate the transfer of additional date for advanced meters. ELEXON recommend that the SVG:

a. agree that the redline text for BSCP514 should be amended to reflect the changes recommended by ELEXON in the table below; and
b. approve CP1274 for implementation in the June 2009 Systems Release.

## IA Summary for CP1274 – Transfer of Meter Technical Details

| IA History CPC number | CPC00651 | Impacts | BSCP514, BSCP504 |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in | Agree? (✓/X) | Days Required to Implement |
|---|---|---|---|
| **Western Power Distribution** | LDSO / MOA | ✓ | - |
| **Scottish and Southern Energy** | Supplier/Generator/ Trader / Party Agent / Distributor | ✓ | 3-6 Months |
| **EDF Energy** | Supplier, NHH Agent and HH MOP | ✓ | 30 |
| **ScottishPower** | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | ✓ | 60 |
| **IMServ Europe Ltd** | HHDC, MOA | ✓ | 182d-365d |
| **TMA Data Management Ltd** | HHDC, HHDA, NHHDC and NHHDA | ✓ | - |
| **British Energy Direct Limited** | Supplier | ✓ | - |
| **AccuRead** | NHHDC, NHHDA, NHHMOP, HHMOP | ✓ | 90 |
| **E.ON** | Supplier – NORW, EELC, EENG, EMEB, PGEN | ✓ | 91 |
| **E.ON UK Energy Services Limited** | MOA NHHDC /DA | ✓ | |
| **Siemens Metering Services** | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO). | ✓ | 90 |
| **SSIL** | HHDC | ✓ | - |
| **OnStream** | Meter Asset Provider and Meter Operator, NHHDC and NHHDA. | ✓ | - |
| **NPower Limited** | Supplier, Supplier Agents | X | - |
| **Gemserv** | MRASCo Ltd | Neutral | - |
| **CE Electric UK** | LDSO, UMSO | Neutral | |
| **Independent Power Networks** | LDSO, UMSO, SMRA | Neutral | - |
| **Association of Meter Operators** | Trade Association for Meter Operators | Neutral | - |

Impact Assessment Responses

| Organisation | Agree? | Comments | Impact? | BSSCo Response |
|---|---|---|---|---|
| **Western Power** | Yes | **Comments:** Our existing procedures for NHH "comms" data will comply with the amended BSCP | X | Comment noted. |

| Distribution | | | | |
|---|---|---|---|---|
| **EDF Energy** | Yes | **Comments:** Currently on winning a site the new MOP will receive the communications type and number via the AIM spreadsheet.<br><br>Depending upon enduring solution is it possible if the old MOP is proactive they could shortly thereafter terminate that communication line. If so then new MOP needs to know who the provider is so that they can arrange the transfer of the line into their name (and potentially change the provider if they have no contract with the existing provider) before the line is cancelled. At present we are not sure if this is a possible process and feel that this issue needs to be considered. It would also be useful if some guidelines (and a process?) were put into place to identify how the transfer of these lines would take place, together with reasonable timescales to allow for the transfer of ownership to take place before a line/SIM is cancelled, if this is an issue. We feel that this issue needs to be considered when further details of enduring solution is known.<br><br>**Impact on Organisation's Systems and/or Processes?** NHH MOP<br><br>**Impact on Organisation** Process | ✓ | We confirmed to EDF (via email) that the transfer of ownership of communications/SIM cards etc is a recognised issue, although not directly related to this Change Proposal. It may need to be taken into account by the special IREG in the work that they are undertaking on the contents and format of the information flows. The long term solution will probably be developed as part of work to develop solutions for the domestic market. In the meantime, the PC5-8 sector is likely to operate along the lines of the current HH sector, where such comms issue presumably already exist and are overcome (albeit, perhaps painfully in some cases). |
| **SAIC on behalf of:**<br><br>**ScottishPower** | Yes | **Comments** ScottishPower believe that the proposed change will help facilitate the smooth operation of advanced metering and ensure that the appropriate details are exchanged between Parties and Agents as and when necessary.<br><br>Furthermore, the CP will help facilitate the developments being pursued at the MRA IREG forum as and when they are introduced to the sector | ✓ | Comments noted. |

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| | | **Impact on Organisation's Systems and/or Processes?** Yes<br><br>**Capacity in which Organisation is impacted** Supplier, NNHDC, HHDC, MOA<br><br>**Impact on Organisation** Internal processes will be impacted by the change and there is a possibility that system changes may be required to implement the exchange of such data. However, we would expect this to occur via the various changes that are currently being discussed and progressed throughout the industry in relation to advanced metering<br><br>**Would implementation in the proposed Release have an adverse impact?** No | | |
| **IMServ Europe Ltd** | Yes | **Comments** Strongly agree with this change proposal as it will reduce the incidents of faults and site visits for the MOA as a result of missing meter comms details<br><br>**Capacity in which Organisation is impacted -** MOA to send comms details in DTN Flow, and DC in being able to receive and process comms details in a DTN Flow.<br><br>**Impact on Organisation:** Systems and internal process will be impacted.<br><br>**Comments** Changes have to be specified through the Wheatley MOP Consortium necessitating a lead time of between 6 and 12 months from the time of the change details being approved.<br><br>**Would implementation in the proposed Release have an adverse impact?** No, although should additional flows be specified then extra controls would be required to ensure that flows are coordinated as required in both sending and receiving.<br><br>**Other Comments:** It would appear sensible to modify the existing MTD flows to incorporate the new details, | | We explained to IMServ that while CP1274 introduces a requirement to transfer comms and security details. A 'special IREG' group under the MRA is working on the method of transfer separately. This group is looking at the options of amending the existing D0150 flow or putting the additional details in a new flow. The 'special IREG' is open to agents. Manual flows will only be used to meet the new obligation until DTC changes are implemented (targeted for November 09).<br><br>Imserv initially suggested the implementation period to be 6-12 months to avoid missing the cycle to submit. After noting the majority of the respondents are in favour of targeting for June 2009 release and the rationale behind this (please refer to Gemserv ELEXON responses), IMServ agreed that they would support this CP being implemented in June 2009. |

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| | | particularly as much of it already exists in the outline structure as 'Not currently used'. Use of a new flow or manual processes, would result in more complex and expensive solutions to implement. | | |
| **TMA Data Management Ltd** | Yes | **Impact on Organisation's Systems and/or Processes?** Yes<br>**Capacity in which Organisation is impacted;** NHHDC<br>**Impact on Organisation** Processes<br>**Other Comments:** We agree to this change with the understanding that this is a temporary measure until an enduring solution using DTC transfer is agreed and progressed. Relying on manual process to obtain critical data is not and cannot be a long-term solution. | | We explained to TMA (via email) that the CP isn't a temporary measure. The high level obligation to transfer communications and security data is an enduring requirement. Meeting the requirement via manual information flows will however be a temporary measure, pending the DTC solution being developed by the special IREG. TMA emailed back, confirming that they are happy with ELEXON's response to their comments. |
| **British Energy Direct Limited** | Yes | **Impact on Organisation's Systems and/or Processes?** Yes<br>**Capacity in which Organisation is impacted -** Supplier<br>**Impact on Organisation** Systems & Processes | ✓ | Impacts noted. |
| **E.ON** | Yes | **Impact on Organisation's Systems and/or Processes?** Yes<br>**Capacity in which Organisation is impacted** Supplier<br>**Impact on Organisation** System<br>**Comments** System changes will be required to store new information. | ✓ | Comments noted. |
| **E.ON UK Energy Services Limited** | Yes | **Comments:** This will facilitate COA process within the Advanced metering environment.<br>**Impact on Organisation's Systems and/or Processes?** Yes | ✓ | Comments noted. |

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| | | **Capacity in which Organisation is impacted:** MOA<br>**Impact:** Systems and processes will require development | | |
| **Siemens Metering Services** | Yes | **Comments:** Whilst Siemens Metering Services agree that there is a need for communications and password details to be transferred, we would prefer that the implementation of this CP is aligned to the implementation of the DTC change currently being drafted.<br>It is our understanding that a new data flow will be created, that will be used to supplement the D150 and D268, and would contain the additional comms details.<br>Our preference would be that implementation of CP1274 is aligned to this DTC change, so that there is a formal means by which this data can be provided (i.e. via the DTC).<br>**Impact on Organisation's Systems and/or Processes?** Yes<br>**Capacity in which Organisation is impacted:** MOA, DC<br>**Impact on Organisation:** This would have process and potential system changes. | ✓ | Siemens initially suggested this CP should be implemented aligned to DTC change, since they were not aware that DTC would be implemented in Nov 09. ELEXON explained that CP1274 introduces a requirement to send comms. and security details for AMR meters (for June 09) and that the 'Special IREG' would develop the changes to the Data Transfer Catalogue (for Nov 09) to define what these details should be. BSCP change could be made prior to the DTC change, because the BSCP requirements could be met by an interim solution being developed by the Special IREG. Siemens now confirmed that they understand the reason behind a June implementation, and are comfortable with our approach. |
| **SSIL** | Yes | **Comment:** Agree with this, but a more specific standard (format and content) is required in the longer term to ensure true inter-operability. | X | We confirmed to SSIL that the 'special IREG' group is developing the more specific standard (format and content). SSIL were comfortable with this approach. |
| **OnStream** | Yes | **Comments:** OnStream believe that the amendment is sensible although the impacts upon existing processes and systems will be dependant upon the method of implementation and the exact information to be provided. OnStream note the solution will not be appropriate unless change proposal 1275 (CP1275) is implemented as without this whilst parties will have the technical information this will be unusable without the appropriate protocols.<br>The level of accessibility to the meter will also need to be | ✓ | CP1275 was sent for industry impact assessment at the same time as this CP (1274). One participant raised comments on CP1275, highlighting that additional wording is needed to fully achieve the aim of the CP. This revision to the wording is significant and therefore a second impact assessment is needed. We anticipate sending CP1275 v2 for impact assessment in the next CPC batch (which will be sent out on 27 February) and bring the CP to SVG on 6 May for decision.<br>This delay will mean that CP1275 would (if approved) be implemented in the November 2009 release. We believe that |

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| | | determined and guidance provided as whilst provision of passwords and communications information is vital to enable interoperability within the market, 3rd party access to assets may need to be restricted to enabling readings and providing tariff updates etc. There is potential that the asset owner will remain responsible for software updates to the meter, unless commercial agreements can be agreed to cover the risk if 3rd parties carry out upgrades on assets they do not own which may result in failure or requirement to visit the site.<br><br>**Impact:** OnStream will be impacted as a Meter Operator, and as NHHDC.<br><br>OnStream will need to make systems changes to facilitate the provision of additional information either in the form of changing systems rules if existing D0150 is implemented as the solution or for development of systems if a new data flow is created.<br><br>As a Meter Asset Provider, OnStream may also be impacted in terms of 3rd parties accessing meters and hence may need to make systems and processes changes to ensure assets remain robust where 3rd parties potentially update software remotely. | | while fully interoperability will not be achieved until both CPs are implemented, there is benefit in implementing this CP in June, as it will improve the current processes.<br><br>We have discussed these comments with Onstream and they now confirm that they do not disagree CP1274 to be implemented in June 2009 Release. However, they are concerned the fact that in order to read a meter on change of NHHDC, the new NHHDC will need both the comms details (CP1274) and access to the outstation protocols (CP1275).<br><br>ELEXON noted that CP1274 isn't contingent on CP1275 as such, but interoperability is contingent on both CP1274 and CP1275.<br><br>Also, we do not consider it necessary to implement both CPs together. |
| **NPower** | No | **Impact on Organisation's Systems and/or Processes? Yes**<br><br>**Capacity in which Organisation is impacted:** Supplier, NHHDC, NHHMOA<br><br>**Impact on Organisation:** System and Process Impact<br><br>**Comments:** Elexon may wish to consider using a different definition of MTDs for MOAs and DCs. For consistency across HH and NHH, and DC and MOA it is desirable that all definitions of MTDs in all documents should state something like "all information required for DCs to remotely retrieve" and "MOAs to remotely | ✓ | ELEXON agrees that BSCP514 (MOA) wording would benefit from including a reference to the data needed by MOAs to remotely configure meters.<br><br>We're concerned however that it could be risky to include the same wording in BSCP504 (NHHDC). The MTD references in BSCP504 relate to MOA-NHHDC flows, rather than MOA-MOA flows. Including a reference to data required by "MOAs to remotely configure" into BSCP504 would potentially create an obligation on MOAs to include level 3 passwords in the MTD they send to NHHDCs, which we do not believe is the intention of the CP (and would potentially undermine the point of having different levels of password). |

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| | | configure"<br><br>MTDs should not just be defined as "any information that is required by the DC to remotely retrieve data from the meter" as this excludes MOA owned data items e.g. Level 3 password required to reprogramme the meter - the transfer of which is critical to interoperability to realise the goal of not changing a meter on a change of agent. | | Following comments from NPower, we propose to clarify the BSCP514 drafting for CP1274 as follows:<br>In this BSCP, any reference to "Meter Technical Details" means all the relevant information about Metering Equipment required by the appropriate Data Collector (or where appropriate, the Meter Operator Agent) to carry out his duties. For the avoidance of doubt this includes, but is not limited to, the items listed in Data Interface flows D0268: Half Hourly Meter Technical Details (for Half Hourly trading) or D0150: Non Half Hourly Meter Technical Details and D0149: Notification of Mapping Details (for Non Half Hourly trading). For Metering Systems that can be read remotely, this also includes all appropriate information required by the NHHDC to retrieve data from the Metering System remotely (and, where appropriate, required by the Meter Operator Agent to configure the Metering System remotely). This may include, but is not limited to, the communications and security details of the Metering System and the Code of Practice of the Metering System installed.<br><br>Note that:<br>• Black text is from the current live BSCP (BSCP514 v14.0);<br>• Blue text is that proposed in the version of CP1274 issued for impact assessment; and<br>• Red underlined text is new, proposed by ELEXON to address the NPower comment on CP1274.<br><br>We believe this is a non-material clarification to the CP1274 solution, which SVG can agree without a new impact assessment (in accordance with step 3.5.2 of BSCP40). |

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| | | | | However, we do not recommend a change to BSCP504, as we do not believe it is intended that Data Collectors should receive the details needed to configure meters (e.g. level 3 passwords).<br><br>We have confirmed our approach to both documents with Npower. Npower is now happy with this Proposal and that it addresses the issues they raised. |
| **Gemserv** | Neutral | **Comments:** Perhaps. If this change is contingent on the work being done at the special IREG, this change may be more suitable for the November 2009 Release. | ✓ | We have discussed this comment with Germserv and agreed that CP1274 isn't contingent on the IREG work.<br><br>The intention of CP1274 is to place an obligation on NHHDCs and MOAs to transfer communications and security details as part of the Meter Technical Details. CP1274 specifies "what" needs to happen. The special IREG changes will specify "how" it should happen – i.e. they will provide a mechanism for transferring the communications and security details. AMR meters are already being installed in large numbers, and communications details are already being transferred between MOAs and NHHDCs by manual methods, this will need to continue with the new licence condition coming into effect on 6 April 09.<br><br>The special IREG has published a Working Practice with a set of data items to be transferred, which will serve as an interim mechanism for transferring the communications and security details until November 2009, when DTN solution will be available. So, CP1274 isn't contingent on the special IREG work. Hopefully CP1274 will provide added impetus for IREG to complete its work in time for November 2009. |
| **Association of Meter Operators** | Neutral | **Comments:** Not convinced this change actually adds anything that isn't already implicit.<br><br>Data may not always be passed from MO to DC, or MO to MO, where there are commercial contracts in place between parties, e.g. Customer/MO where passing data to | | ELEXON agree with the comments that it is arguably already implicit. This change makes it an explicit requirement.<br><br>His second point is that, if the MO owns the communications equipment and SIM card, they are unlikely to want to pass the comms details to the new MO, until the new MO has replaced |

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| | | another MO would be inappropriate. This has been common practice in the HH market since 1994, and will continue, irrespective of these changes. The commercial reality was recognised at the Advance Metering Forum in Nov08. | | the comms contract. This happens at the moment in the HH market and is a commercial reality. However, this doesn't negate the need to pass comms & security details to the DC or new MO. ELEXON noted there will be commercial issues which might affect the timeliness of data transfer. |

Comments on Redline text

| No. | Organisation | Document name | Location | Severity Code | Comments by Reviewer | ELEXON Recommendation |
|---|---|---|---|---|---|---|
| 1 | **OnStream** | CP1274 redline changes to BSCP504 v20.1 conformed | P3 para 2 | M | As it stands the paragraph wording is very open "For NHH Metering Systems that can be read remotely, this also includes all appropriate information required by the NHHDC to retrieve data from the Metering System remotely. This may include, but is not limited to, the communications and security details of the Metering System and the Code of Practice of the Metering System installed."<br><br>This may result in detailed discussions between meter operators and data collectors to determine what is required, which may be avoided with greater clarity on requirements.<br><br>The NHHDC requires access to the metering system to retrieve reads to meet responsibilities or may arrange this through a Data Retriever (DR) However whilst access to read information may be required by the NHHDC, meter operators will also require access to carry out 'Smart' metering functions such as software updates, this may result in various layers of access/protocols being required. This may not impact this change proposal but may impact on the proposal in future. | ELEXON recommends that the change should not be made because this intended to be a high level obligation on MOAs to transfer comms and security details to other MOAs and to DCs. The detail of what is required to be transferred will be defined by the 'special IREG'. We have discussed this with Onstream who are now comfortable with our approach. |

**Appendix 11 – Detailed Analysis of CP1277 - Change to UMS Charge code Approval Process**

# 1 Introduction

1.1 Scottish & Southern Energy raised CP1277 'Change to UMS Charge code Approval Process' on 31 December 2008. CP1277 concerns improvement of the approval process for applications for new Unmetered Supply (UMS) charge codes and switching regimes. Currently applications must be:

- Approved by the Supplier Volume Allocation Group (SVG) following a recommendation by the Unmetered Supplies User Group (UMSUG), which meets quarterly; and
- The charge code/switching regime must also go through the Market Domain Data (MDD) process which can take up to a month.

1.2 This process means that approval of a new charge code/switching regime can take up to 4 months. ELEXON can issue a temporary charge code/switching regime while the permanent code goes through the approval process.

1.3 CP1277 states that the accuracy of Settlement is adversely affected by the risk that equipment could be connected to a Distribution Network with a temporary code but ultimately a UMS charge code/switching regime is not approved. The proposer argued that shortening the approval process would decrease the impact of this risk.

1.4 The proposer also argued that the use of temporary codes increases the administrative burden and complexity of the approval process, since an extra charge code/switching regime is created for each application (an initial temporary code and a different permanent code). The proposer further suggested that some UMS manufacturers could view the approval process as cumbersome and prohibitively onerous to undertake. If this means that they do not seek the proper approval, the result could be unapproved equipment being connected but not accounted for in Settlement.

1.5 CP1277 aims to:

- Introduce a more streamlined process resulting in quicker approval of charge codes and switching regimes, thereby decreasing the need for using temporary codes; and
- Reduce complexity in approval processes so charge code and switching regime approvals will be easier to manage (both for ELEXON and industry participants).

1.6 The proposer argues that reduced use of temporary codes and faster approval of actual charge codes and switching regimes would deliver increased accuracy in settlement.

# 2 Solution

2.1 The proposed solution to the issues identified by CP1277 is to incorporate the UMS charge code/switching regime approval process into the scope of MDD. ELEXON would construct charge codes/switching regimes, consulting with industry experts where appropriate.

2.2 The MDD Change process (as detailed in BSCP509 'Changes to Market Domain Data') would be used to inform/consult the industry on the changes and to seek feedback on impacts. Industry impact assessment would include Distributors, and changes would be subject to approval by the SVG (already part of the BSCP509 process).

2.3 Under this amended process charge codes/switching regimes would be constructed by ELEXON and passed into the MDD process prior to SVG approval. This could reduce the total time for approval to just over a month, depending on the MDD timetable.

2.4 The solution requires amendment to BSCP520, the UMS Operational Information Document (OID) and the UMSUG Terms of Reference. UMS Guidance Notes would also need to be updated.

2.5 In addition, minor changes would be made to BSCP520 to clarify the 'Approval of Equivalent Meter' process. It would be made clear that the UMSUG makes a recommendation only, not a decision; the Panel makes the final decision.

2.6 The proposed redlined changes to BSCP520, as issued for Impact Assessment, are included as attachment C1 to this paper.

## 3 Impact on ELEXON Operations

3.1 The implementation of CP1277 would require ELEXON to draft changes to the UMSUG Terms of Reference and UMS Guidance Notes. This involves 6 Man Days implementation effort, equating to an estimated cost of £1,320.

3.2 Ongoing operational effort would be absorbed into ELEXON's existing operational activities and would not incur additional costs.

## 4 Participant Impact Assessment

4.1 ELEXON issued CP1277 for participant impact assessment on 9 January as part of CPC00651. We received 16 responses; of which 9 agreed, 2 disagreed, and 5 were neutral.

4.2 Impact on participants is minimal; only two respondents identified impacts. In both cases 30 days required lead time was stated. The impacts are limited to changes to procedures and processes.

4.3 None of the respondents that agreed gave any rationale further to that presented in CP1277. The respondents that disagreed with CP1277 both agreed with the general intent of the proposal, to improve the process, but not the solution proposed. They acknowledge that the current approval process is cumbersome and that the issues around the length of the approval are valid, but believe that CP1277 does not offer a satisfactory solution to the problem, and that despite any areas for potential improvement, the current process is effective and robust.

4.4 Specific concerns raised by the two respondents that disagreed with the CP1277 solution were:

- MDD has a limited distribution which may be insufficient in this area, and MDD consultations can often elicit a limited response, risking approval without due diligence.
- Expert groups help higher authorities to make informed decisions; removing the UMSUG from the approval process would put greater onus on the SVG to understand technical papers without the recommendations of UMSUG.
- Use of temporary/provisional codes must continue; they allow equipment, often already connected and consuming energy (at the time of the application), to be reflected in Settlement.
- The solution removes UMSUG consideration of new codes leaving ELEXON to seek assistance from industry experts. Expert contribution should be encouraged, but the proposed process does not allow for the breadth of views expressed at UMSUG, particularly from customer and manufacturer representatives who often have a different perspective.

4.5 One respondent suggested the current process should be maintained but might be modified to speed it up. Pending charge codes could be provided to UMSUG members outside of actual meeting dates, and feedback requested; these could then be passed to the next SVG meeting

with an UMSUG recommendation. Controversial changes could still be discussed at an UMSUG meeting. This would maintain the robustness of the process but cut the time taken to process the majority of new codes.

4.6 The other respondent suggested the Unmetered Supplies Expert Group (UMSEG) and Meter Administrator Expert Group (MAEG) which both have relevant expertise should undertake a wider review of the approval process jointly. The respondent believes such a review could reduce bureaucracy and accelerate the process, and address issues not covered by CP1277, including:

- Many temporary codes have been in existence for years, without manufacturers providing test data; there needs to be a mechanism to chase for further details (one suggestion is that the chargeable watts should be increased where necessary information has not been provided).
- Does all equipment need to have a code approved; there are many different instances where equipment has been given a code by the UMSO without formal approval (e.g. town clock); these are one-off pieces of equipment for which a pragmatic solution should be recognised. Similarly, generic equipment like traffic signal controllers have a variety of wattages; does each combination of equipment need separate approval?

4.7 **UMSUG View**

4.7.1 We received representations from several members of the UMSUG. None of the members agreed with the solution proposed by CP1277. One member shared the concern regarding reliance on the MDD process that was raised by an IA respondent, commenting that the MDD Circular would not necessarily reach the correct people, or elicit many responses, and that responses would be independent views with no opportunity to debate and gain greater understanding of the equipment in question.

4.7.2 ELEXON believes that the MDD consultation process would be adequate for use in the manner described in CP1277. This is especially true since in complex cases assistance would be sought from the UMSUG or other appropriate experts, which gives additional comfort regarding the robustness of the proposed process.

4.7.3 The members believed that:

- The extent of debate at typical UMSUG meetings demonstrates the benefit of a face-to-face group with different areas of expertise; the UMSUG group provides a balance of informed views from the UMS sector, which is not a mainstream area.
- UMSUG is essentially the only real sounding board for customer and wider industry views prior to codes being established.
- The operation of the approval process has already improved considerably with regard to the speed with which temporary or permanent codes are assessed and implemented.
- The number of experienced staff involved in UMS across the industry has tended to reduce in recent years, but the involvement of the UMSUG has ensured that a high level of UMS experience and expertise has been retained in the code approval process.
- Contrary to the intent of CP1277, the code approval process could become protracted without an UMSUG presence.

# 5 Conclusions

5.1 It is clear from the large majority of Impact Assessment responses agreeing with CP1277 that the aim of improving the UMS charge code/switching regime approval process is supported. This is reinforced by the fact that the two respondents who disagreed with making the change disagreed

 

with the solution put forward, not the aim of improving the efficiency of the process. The two respondents that disagree with the CP1277 solution raised some arguments against CP1277 which are discussed in this section.

5.2 A key aspect of CP1277 is that the use of temporary and provisional codes would be discontinued. This would be done to remove the risk that equipment could be connected with a temporary code and ultimately never have an approved UMS charge code/switching regime assigned to it; the proposer argued this risk has a detrimental impact on the accuracy of Settlement. However, a respondent stated that the use of temporary/provisional codes should continue because they allow equipment, often already connected and consuming energy (at the time of the application), to be reflected in Settlement.

5.3 ELEXON believes that there is benefit in removing temporary/provisional codes so that UMS equipment is issued only a single code, and only after the necessary validation, and equipment that is not suitable for UMS status is not issued a charge code/switching regime. This would ensure the necessary rigour is applied in all UMS applications.

5.4 In ELEXON's view, the present risk to Settlement accuracy caused by equipment that is not suitable for UMS status being issued a charge code/switching regime (which can then apply on an ongoing, indefinite basis, without full validation), outweighs any risk that CP1277 would introduce by delaying the issuing of an charge code/switching regime (so that only approved, fully validated codes are issued). Neither present nor potential risk to Settlement accuracy is quantified, but ELEXON considers that CP1277 would remove an avenue of potentially introducing ongoing errors, at the cost of introducing finite delays after which accurate information is available.

5.5 Another point raised is that the CP1277 solution removes UMSUG consideration of new codes, leaving ELEXON to seek assistance from industry experts. It should be noted that it is envisaged that in the first instance the experts that ELEXON would consult with would be the UMSUG itself (potentially at a meeting or via correspondence), or a subset of UMSUG members (for efficiency). This mitigates the concern that in complicated cases ELEXON would be deprived of the benefit of the UMSUG's broad expertise.

5.6 A respondent suggested a wider review of the approval process should be undertaken, citing other areas for potential improvement. However, ELEXON believes that CP1277 addresses the issues it has identified and as such is fit for purpose and should be approved. If any participants believe that there are other issues around the approval process then they may initiate a change or review through the normal channels.

## 6 Recommendation

6.1 ELEXON's recommendation, based upon the efficiency benefits of CP1277 and the benefit of removing provisional and temporary codes, the considerations and conclusions outlined in this section and the majority support from impact assessment respondents, is to:

a. Approve CP1277 for inclusion in the June 2009 Systems Release.

**IA Summary for CP1277 - Change to UMS Charge code Approval Process**

| IA History CPC number | CPC00651 | Impacts | Process/procedure impacts only. |
|---|---|---|---|

| Organisation | Capacity in which Organisation operates in (Impacted Capacity in Bold as appropriate) | Agree | Days Required to Implement |
|---|---|---|---|
| **Central Networks** | Distributor | Yes | 30 |
| **Western Power Distribution** | LDSO / MOA | Yes | - |
| **Scottish and Southern Energy** | Supplier/Generator/ Trader / Party Agent / Distributor | Yes | 0 |
| **EDF Energy** | Supplier, NHH Agent and HH MOP | Yes | 0 |
| **TMA Data Management Ltd** | HHDC, HHDA, NHHDC and NHHDA | Yes | - |
| **British Energy Direct Limited** | Supplier | Yes | - |
| **NPower Limited** | Supplier, Supplier Agents | Yes | - |
| **E.ON** | Supplier – NORW, EELC, EENG, EMEB, PGEN | Yes | - |
| **Independent Power Networks Ltd** | LDSO, UMSO, SMRA | Yes | - |
| **ScottishPower** | Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA | No | 30 |
| **Power Data Associates Ltd** | Meter Administrator | No | - |
| **Gemserv** | MRASCo Ltd | Neutral | - |
| **AccuRead** | NHHDC, NHHDA, NHHMOP, HHMOP | Neutral | |
| **CE Electric UK** | LDSO, UMSO | Neutral | - |
| **E.ON UK Energy Services Limited** | MOA NHHDC /DA | Neutral | - |
| **Siemens Metering Services** | Party Agent (NHHDA, NHHDC, NHHMO, HHDC, HHDA, HHMO). | Neutral | - |

Impact Assessment Responses

| Organisation | Agree | Comments | Impact | ELEXON Response |
|---|---|---|---|---|
| **Central Networks** | Yes | **Impact on Organisation's Systems and/or Processes?** Change of procedures and processes | Yes | - |
| **NPower** | Yes | Process Impact Only | Yes | - |

| | | | | |
|---|---|---|---|---|
| **Limited** | | | | |
| **ScottishPower** | No | **Comments** Though the CP raises a valid issue in regards to how long it can take for a charge code to be approved ScottishPower feel that the CP does not offer a satisfactory solution to the problem and that there may be a simpler solution which would maintain the current structure whilst putting in place processes which would speed up the approval process.<br><br>It is our belief that the current process though somewhat cumbersome is effective, robust and by and large works. MDD has a limited distribution and may not have a wide enough audience for such an important area of UMS. Furthermore, responses to MDD consultations is at times patchy at best, running the risk that changes could be approved without due diligence.<br><br>Furthermore, the structure of sub-committees exists to filter down decisions to experts in the particular field to assist the higher authorities (SVG & Panel) to make informed decisions. Removing the role of UMSUG in the approval process would remove this stage and put a greater onus on SVG to understand technical papers without the recommendations of UMSUG to assist in making such decisions.<br><br>Therefore we believe that the current process should be maintained though there is a case for adaptation to speed the process up. ScottishPower propose that rather than changing the process as suggested in this CP or increasing the frequency of UMSUG meetings, pending charge codes could be provided to UMSUG members outside of the actual meeting dates requesting feedback on changes. These could then be passed to the next available SVG meeting with the recommendations of UMSUG members. Where a change is controversial its application could be passed to the UMSUG meeting for further discussion.<br><br>We believe this would maintain the robustness of the current process whilst cutting the time taken to process new charge codes for the wider UMS community.<br><br>**Would implementation in the proposed Release have an adverse impact?** No. There would be no adverse impact caused by the implementation | No | Comments discussed in recommendation section above |
| **Power Data Associates Ltd** | No | I agree with the general intent of the proposal (improve the process), but not the implementation.<br><br>The use of temporary and provisional codes must continue. These are needed to allow equipment, which is often already connected and consuming energy (at the time of the | | Comments discussed in recommendation section above |

| | | | | |
|---|---|---|---|---|
| | | application) to be reflected in settlement, supplier and DUoS charges.<br><br>Whilst I agree the process would benefit from revision as the current process is very labour intensive the change proposes taking UMSUG out of the consideration of new codes and leave the BSCCo with seeking assistance from 'industry experts'. While this is good when industry experts contribute it does not allow for the breadth of views expressed at UMSUG, particularly from customer and manufacturer representatives who often have a very different perspective from the 'electricity industry'. There have been great strides from ELEXON in improving the code application process which has greatly improved the approval process, yet the recent UMSUG meetings have highlighted issues and changes which had not been identified by 'industry experts'.<br><br>I would suggest a wider review of the approval process using the resources of the combined UMSEG & MAEG to review the approval process. This review should reduce bureaucracy, speed the process, but also address some of the issues that have not been addressed, including<br><br>• Of the many temporary codes have been in existence for years, without manufacturers providing test data – there needs to be a mechanism to chase for a this further detail, it has been suggested that the chargeable watts should increase where this information has not been provided.<br><br>• Does all equipment need to have a code approved? There are many different codes where equipment has been given a code by the UMSO without formal approval, eg town clock – these are one off pieces of equipment which a pragmatic solution should be recognised. Similarly, generic equipment like traffic signal controllers have a variety of wattages, does each combination of equipment need separate approval.<br><br>I would suggest these issues are packaged and consider together. | | |

Comments on Redline text

No comments received.

## Appendix 12 – New Draft Change Proposals and Change Proposals

New Draft Change Proposals

There are no new Draft Change Proposals this month.

New Change Proposals

| CP | CVA/SVA | Title | Description | Raised |
|---|---|---|---|---|
| 1279 | SVA | Housekeeping Change to BSCP515 – Licensed Distribution | As described on page 9 (section 7.3) of this paper. | 04/02/09 |
| 1280 | SVA | SVAA to provide LDSOs with aggregated consumption data for embedded Distribution Systems | **Issue:** The BSC requires the SVAA to provide Distribution System Operators with metering data for purposes of operating and charging for the use of their Distribution Systems.<br>Currently the BSCP only covers metering data for NHH Metering Systems directly connected to the network of the LDSO receiving the data. They do not include:<br>• Data for HH Metering Systems<br>• Data for Metering Systems connected to other LDSOs' Distribution Systems embedded within the LDSO's network.<br>However, the DCUSA provisions for relationships between Distributors acknowledge that boundary metering is not necessarily required in all cases, and that an 'Alternative Solution' will be appropriate in some cases.<br>The Primary concern with requiring the boundary metering for embedded metering for all embedded networks is that the cost per meter is high. As the number of IDNO and 'out of areas' networks increases, the total cost associated with metering the boundaries between networks will increase.<br>**Solution:** To avoid the cost to industry of unnecessary metering at the boundaries between networks, it is proposed that the SVAA should provide each LDSO with aggregated consumption data for customers on licensed networks embedded within that LDSOs' network. | 05/02/09 |

## Appendix 13 – Release Information

Key to Release Plan

Change Proposals and Modification Proposals in BLACK text represents SVA changes, RED text represents CVA changes and BLUE text represents changes which impact both the SVA and CVA arrangements.

| The Authority decision dates are provided in the following format: | |
|---|---|
| **P** | Modification Proposal number |
| **(< date)** | Date by which a determination must be made by the Authority in order for the Modification Proposal to be implemented within the indicated release |
| **Pro✓/Pro×** | Indicates that the Panel's recommendation to the Authority was to Approve/Reject the proposed Modification |
| **Alt✓/Alt×** | Indicates that the Panel's recommendation to the Authority was to Approve/Reject the Alternative Modification |

| | | Release Date | | | |
|---|---|---|---|---|---|
| | | **February 2009 Scope (Imp. Date 26 Feb 09)** | **June 2009 Scope (Imp. Date 25 Jun 09)** | **November 2009 Scope (Imp. Date 05 Nov 09)** | **Standalone Releases** |
| **Change Proposals** | **Pending** | | 1265, 1266, 1268, 1270, 1271, 1272, 1273, 1274, 1276, 1277, 1279 | 1260, 1248,1267, 1269, 1275, 1278, 1280 | P216 Alt✓ (Imp. Date 20 Apr 09) |
| | **Approved** | 1205, 1206, 1207, 1250, 1251, 1252, 1253, 1254, 1255, 1258, 1261, 1262, 1263 | 1249 v2.0, 1256, 1257, 1259, 1264 | | |
| **Modifications** | **Pending** | | P226 Pro✓, P226 Alt× | P226 Pro✓, P226 Alt× | |
| | **Approved** | | P215 Alt✓, P222 Alt× | P217 Alt✓, P223 Alt✓ | |
| **Updates** | | The February 2009 Release is progressing to time and quality. Logica have successfully completed their testing of the NHHDA changes. ELEXON Completed testing in early February. The ISG approved the amendments to the Category 2 documents at the January meeting. | The June 2009 Release is progressing to time and quality. The P215 and P222 documentation being amended by the Release has been reviewed by Industry and will be presented to the Panel Committees for approval in February and March. | Planning for the November 2009 Release is underway based on Modification P217 and P223. The PID and Plan was issued to the Programme Board for review in January. NGC and Logica have started work on the development of the P217 changes. | The P216 Release is currently progressing to time and quality. The industry review of the new BSCP128 is now complete. It will be presented to ISG and SVG, before being presented to the Panel for Authorisation in March. The implementation date is 20 April 2009. |

Draft CP Scope of the June 2009 Release

| CP | Title | Impacts | Demand Led Cost | ELEXON Operational | | Total |
|---|---|---|---|---|---|---|
| | | | | Man Days | Cost | |
| CP1249 v2.0 | Correcting MDDM and SVAA Terminology | SVA Data Catalogue vol. 1 and 2. | £0 | 2 | £440 | £440 |
| CP1256 | Action on Backdated D0052 flows | BSCP504, BSCP520 | £0 | 4 | £880 | £880 |
| CP1257 | Calculation of EAC for Temporary Supplies | BSCP520 | £0 | 2 | £440 | £440 |
| CP1259 | Distributor-Supplier Notification where a Site is capable of Exporting (microgeneration) | BSCP515, SVA Data Catalogue Volume 1 | £0 | 3 | £660 | £660 |
| CP1264 | Clarification of Password Requirements in the Codes of Practice | CoP1, CoP1, CoP3, CoP5, CoP6, CoP7, BSCP601 | £0 | 2 | £440 | £440 |
| | | **Total**[34] | **£0** | **13** | **£2,860** | **£2,860** |

[34] A Tolerance of 20% applies for both Demand Led costs and ELEXON Operational Costs