ISG114/01

Meeting name	Imbalance Settlement Group (ISG)
Date of meeting	27 July 2010
Paper title	Change Proposal Progression
Purpose of paper	For Decision
Synopsis	This paper provides: • CP1335 for your consideration and agreement on its progression; and • a summary of all open Draft Change Proposals (DCPs) and Change Proposals (CPs).

1 Summary

1.1 Since ISG113 we have raised three Change Proposals (CPs) which we issued for BSC Party Impact Assessment via Change Proposal Circular 685 (CPC00685). Details of these changes can be found in Appendix 2.

1.2 This paper presents CP1335 for your consideration and agreement on its progression.

2 CP1335 'Creation of New Auxiliary Meter Technical Details Data flow'

2.1 Background

2.1.1 On 6th April 2009 a new Supply Licence Condition came into effect that required the installation of advanced meters for Profile Class 5-8 sites. To support this new condition, Master Registration Agreement (MRA) Parties devised an interim manual solution to allow technical details specific to advanced meters, e.g. communication methods and addresses, to be exchanged between participants.

2.2 Why the need for Change

2.2.1 On 29 April 2010, the MRA Development Board approved an enduring solution in the form of a new data flow, the Dxxx 'Auxiliary Meter Technical Details', which is designed to be sent alongside the D0150 NHH Meter Technical Details flow in cases where advanced meters are fitted. A corresponding MRA Working Practice requires that this flow, or at least the information contained within it, should be mandatory where the relevant conditions apply.

2.2.2 It is important to note that the conditions established by the MRA solution are based around the Meter Type data item, rather than either the Profile Class or a definition of 'advanced meter'. The Working Practice states that:

"Where a new installation of a meter intending to be remotely read occurs but the communications are not operating initially, the Meter Type should be set to 'N', and the D0149/D0150 sent. When the communications are installed and operational on the metering equipment the Meter Type should be changed to NCAMR RCAMR or RCAMY, and the D0149/D0150 and Dxxxx sent."

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2.2.3 NCAMR, RCAMR and RCAMY are Meter Type codes that are used to denote remote read capability; a full definition is available from the MRASCo website here[1].

2.2.4 To provide robust governance for the use of this flow, it needs to be referenced in the relevant BSC Procedures. Furthermore, the data flow includes a new data item, 'Communications Provider ID', whose valid set is to be maintained through Market Domain Data.

3 Proposed Solution

3.1 We raised CP1335 on 28 May 2010 and subsequently issued it for impact assessment via CPC00681 in June 2010. CP1335 aims to align the BSC with the MRA change.

3.2 The following Code Subsidiary Documents (CSDs) will need to be amended in order to align the BSC with the proposed changes:

- **BSCP504 and BSCP514:** These BSCPs would be modified to include obligations on Meter Operators and Data Collectors to make use of the new flow alongside the D0150 in cases where advanced meters are fitted. New appendices will be created explaining the exact circumstances where the flow must be used, and these will be cross-referenced from the relevant steps in the interface timetables.
- **BSCP515[2]:** A minor change is required to reference the use of the new flow when MOAs send meter technical details to LDSOs for new installations. The detailed requirements for the sender (the MOA) would remain in BSCP514.
- **BSCP537 Appendix 1 (Self Assessment Document) and Appendix 2 (Testing Requirements):** References to the new flow would be included in the qualification testing requirements for Suppliers, NHHMOAs and NHHDCs, ensuring that new entrants are capable of using the flow or handling the data within it.
- **SVA Data Catalogue (Volume 1 & 2):** The Catalogue would be amended to include the new flow in the index and include references to BSCP504 and BSCP514 along with the relevant from/to instances.
- **Market Domain Data:** Add identifiers for Communications Providers into MDD. This would be achieved by raising an MDD Change Request against MDD Entity 21 (Market Role) and then assigning this role to participants added through MDD Entity 1 (Market Participant). No changes to the MDD system itself should be necessary.

4 Intended Benefits

4.1 The new flow aims to ensure Meter Operators and Data Collectors are able to operate advanced meters successfully, especially following Change of Supplier and Change of Agent events. The data flow goes further than the interim solution in that it provides details of a meter's data storage configuration in order to ensure that when carrying out remote reads, information is collected from the correct registers.

4.2 Including the flow in the BSCPs will mandate its use by Meter Operators and Data Collectors, ensuring a consistent approach is followed by all participants.

[1] Note that the RCAMY Meter Type is being added by DTC CP3308 as part of the November 2010 release.
[2] Following industry impact assessment responses for CPC00681, BSCP515 is no longer impacted by CP1335. Please see point 5.4.

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4.3 The creation of a new Communications Provider role in MDD will ensure that the market has a robust central source for this data, ensuring each Metering System's communications provider[3] can be identified accurately.

5 Industry Views

5.1 We received 16 responses to CPC00681. Of these 11 agreed, 3 disagreed and 2 were neutral.

5.2 The respondents who supported the change believed that it aligned with the MRA change and reduced interoperability issues.

5.3 Some of the respondents who disagreed with CP1335 believed that the new data flow should not be issued to Distributors because they do not require or use the information, and that Meter Operator Agents (MOA) should be responsible for backfilling of data for all Metering Systems impacted by the Dxxx flow.

5.4 We agree with the respondents and recommend that the following changes be made to the redlining in order to reflect these concerns:

- Remove all references to distributors receiving the new Dxxx flow. Distributors would not use or require the information contained within the Dxxx flow and it would therefore not be beneficial to submit the new flow to distributors. This means that there would be no changes necessary to BSCP515.
- Amend the redlining within BSCP514 to ensure that MOAs backfill data for all Metering Systems impacted by the new flow. We suggest amending the redlining within section 9.3 as following:

  (Original redlining) - the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System. **(Proposed addition to redlining)** The NHHMOA shall be responsible for backfilling data for all Metering Systems impacted by the Dxxx flow.

5.5 The respondents, who disagreed with CP1335, because of the above reasons, supported these changes and are now in agreement with the proposed changes.

5.6 Another respondent did not agree with CP1335 because they were not supportive of the MRA change.

[3] The unique market-wide reference for a provider of network communications equipment i.e. the company who is providing the communications infrastructure to allow data to be collected remotely from an AMR meter.

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6 Impacts and Costs

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	8 days, equivalent to £1,980	February release suitable
Industry IA respondents	**Suppliers** – Systems Impacts identified **BSC Party Agents –** System and Process Changes identified **Distributors** – No impact	The majority of respondents believed that the February Release was suitable

6.1 A respondent highlighted that they would not be able to make the February release because they were currently upgrading their systems. They suggested that a June release would be more achievable.

6.2 Another respondent believed that this would result in a significant change to their customer and MOP systems. The respondent believed that it would take 12-15 months to implement the change.

7 Implementation Approach

7.1 We propose that CP1335 is included in the February 2011 Release, because this will align with the MRA change and the majority of respondents can meet this implementation timescale.

8 Recommendations

8.1 We invite you to:

- **AGREE** the suggested amendments to the redline text; and
- **APPROVE** CP1335 for implementation in the February 2011 Release.

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List of Appendices:
Appendix 1 – CP1335 Detail of Industry Impact Assessment
Appendix 2 – New Change Proposals
Appendix 3 – Summary of Open Change Proposals
Appendix 4 – BSC Releases

List of Attachments:

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Attachment A – CP1335 v1.0
Attachment B – CP1335 Redline changes to BSCP504
Attachment C– CP1335 Redline changes to BSCP514
Attachment D – CP1335 Redline changes to BSCP515
Attachment E – CP1335 Redline changes to BSCP537 Appendix 1
Attachment F – CP1335 Redline changes to BSCP537 Appendix 2
Attachment G – CP1335 Redline changes to SVA Data Catalogue Volume 1
Attachment H – CP1335 Redline changes to SVA Data Catalogue Volume 2

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Appendix 1: CP1335 Detail of Industry Impact Assessment

Table 1: Industry Impact Assessment Summary for CP1335 – Creation of New Auxiliary Meter Technical Details Data flow

IA History CPC Number	CPC00681	Impacts	BSCP514,BSCP515,BSCP504		
Organisation	**Capacity in which Organisation operates in**		**Agree?**	**Impacted?**	**Days needed to implement**
MRASCo Ltd	MRASCo		Yes	Yes	0
Spark Energy			Neutral	Yes	90
TMA Data Management Ltd (MPID UDMS)	HHDC, HHDA, NHHDA and NHHDC		Yes	Yes	90
Western Power Distribution	Distributor/MOA		Agree in principle subject to a couple of points below.	Yes	180
EDF ENERGY NETWORKS	EDF Energy Networks (EPN) plc, EDF Energy Networks (LPN) plc, EDF Energy Networks (SPN) plc, EDF Energy (IDNO) Ltd (EDFI		Yes	Yes	We are unable to give you accurate dates at this time
E.ON	Supplier		No	Yes	300
Electricity North West Limited	LDSO		No	Yes/No	0
EDF Energy	Supplier, NHH Agents, HH MOP		Yes	Yes	180
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	Supplier, LDSO, HHDA, NHHDA, HHDC, NHHDC, HHMOA, NHHMOA		No	Yes	180
British Energy	Generator, Supplier, Trader Non Physical, Party Agent (CVA MOA)		Yes	Yes	30
E.ON UK Energy Services Limited	MOA & NHHDC		Neutral	Yes	180

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British Gas	Supplier	Yes	Yes	6 months
IMServ	HHDC, NHHDC, MOA, NHHDA, HHDA	Yes	Yes	180
Scottish & Southern Energy	Supplier/ Generator/ Trader/ Party Agent/ Distributor	Yes	Yes	12 - 15 months
NPower Limited	Supplier/ Supplier Agents	Yes	Yes	Please see Response to Q4
Bglobal Metering		Yes	Yes	180

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Table 2: Impact Assessment Responses[4]

Organisation	Agree?	Impacted?	Comments	ELEXON Response
MRASCo Ltd	Yes	Yes	**Agree change comment** - Aligns with DTC CP 3310 'Introduction of a new flow to support additional information for Advanced Meters'. The new flow aims to ensure Meter Operators and Data Collectors are able to operate advanced meters successfully, especially following Change of Supplier and Change of Agent events. **For which role is your organisation impacted?** MRASCO Ltd **Please state what the impact is** - This is the corresponding change to DTC CP 3310. **Would implementation in the proposed Release have an adverse impact on your organisation?** No. The Release date coincides with the DTC and WPPS changes.	-
Spark Energy	Neutral	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is -** unsure but because of need for MTDS and with the implementation / installation of Smart Metering will need further information to assess properly. **Would implementation in the proposed Release have an adverse impact on your organisation?** Possibly unknown fully at this time. **Associated costs:** Unknown at this time.	-
TMA Data Management Ltd	Yes	Yes	**For which role is your organisation impacted?** NHHDC **Please state what the impact is** - System and Procedure impact **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-

[4] Please note that we have only included responses in this table where the respondent provided additional information.

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Associated costs - Cost would be high	
Western Power Distribution	Agree in principle subject to a couple of points below.	Yes	**Agree change comment:** 1. There is currently no need for the Distributor to receive the new flow as the remote disconnection capability, the only data item we are interested in, will be communicated by the meter type in the D0150. Our preference is therefore not to receive the new flow although it is fairly simple to just archive it if it is sent to us. 2. Our understanding from the special MRA IREG at which the new flow was agreed was that the BSCP change would mandate the backfilling of data for the new flow, in particular the need to change the meter type for AMR meters already fitted. This does not appear to have been done. Although the backfilling of data is implied as the new flow will not be able to be sent if it is not done, we believe it would be clearer if this was made explicit. **For which role is your organisation impacted?** Distribution MOA **Please state what the impact is:** Distribution – possible need to receive the new flow, depending on whether the MOA-Distributor instance of the flow is retained as part of the CP. MOA – System changes will be required. **Would implementation in the proposed Release have an adverse impact on your organisation?** No	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text. We recommend that the following (please see red text below) be included as part of the original redline text within BSCP514, section 9.3: **the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.** The NHHMOA shall be responsible for backfilling data for all Metering Systems impacted by the Dxxx flow.
EDF Energy Networks	Yes	Yes	**For which role is your organisation impacted?** Networks/Distribution **Please state what the impact is -** Updating our systems to get it to recognise and load this new flow alongside the D0150 **Would implementation in the proposed Release**	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			have an adverse impact on your organisation? No **Associated costs** - we are unable to give details of associated costs at this time	
E.ON	No	Yes	**Agree change comment** - We were not supportive of the associated change under the MRA DTC CP3310 **For which role is your organisation impacted?** Supplier, NHHDC and HHDC **Please state what the impact is -** Changes to Supplier and DC systems **Please explain the lead time** - As ELEXON are aware we are currently upgrading some of our systems therefore an implementation date of June 2011 or beyond would be beneficial. **Would implementation in the proposed Release have an adverse impact on your organisation?** Yes we would need to make changes to systems which we are currently in the process of replacing as well as ensuring that the new systems are compliant with the requirements of the change. **Associated costs** – not available	-
Electricity North West Limited	No	Yes/No	**Agree change comment** - As an LDSO we are unlikely to need the data contained in this flow. It may be better to redraft the DTC CP to remove the instance of the flow from MOp to Distributor. **Any other comments** - At a recent IREG meeting, Elexon advised that they would draft the change to mandate the backfilling of the AMR data on this flow, but that doesn't appear to have been done?	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text.
EDF Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier, NHHDC and NHH MOP **Please state what the impact is -** System and process changes are required	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Please explain the lead time - As we are already aware of these requirements from associated MDB changes we are confident that February 2011 is a reasonable timeframe for this change. **Would implementation in the proposed Release have an adverse impact on your organisation?** No – release date for this change already known about. **Associated costs** – not known	
Accenture on behalf of: ScottishPower Energy Management Ltd. ScottishPower Generation Ltd. ScottishPower Energy Retail Ltd. SP Manweb plc. SP Transmission Ltd. SP Distribution Ltd	No	Yes	**Agree change comment** - Though we agree with the sentiment of the CP and supported the related MRA change ScottishPower cannot at this time lend our support to the CP without a number of changes. During the development of the additional flow at Special IREG, it was our understanding that as the data item 'Remote Shutdown' was being highlighted in a new Meter Type RCAMY there was no reason for the Distribution businesses to receive the flow as there was no data held within it which was required. However, within the redline changes in the various attachments this has not been reflected and as such it is our opinion that either additional text should be included within the redline changes or a footnote should be added to the affected BSCPs which clearly highlights that the flow should not be sent to the LDSO. It was also our understanding that as there will be the requirement for backfilling of data on Go-Live there would be a necessity for all the data contained within the D0149/D0150 to be back filled to enable the new flow to be sent. There does not appear to be any reference to this within the CP. It is, in our opinion necessary for this to be included in the CP to ensure that the action is performed by MOAs to ensure consistency going forward from the Go-Live date. If these changes are made or accommodated then we would have no hesitation in supporting the CP.	We agree that the distributor does not need to receive this flow. Our recommendation is that all references to the Dxxx data flow being sent to the distributor are removed. This is consistent with the MRA change that was approved. We agree that backfilling of data is implied, however, we agree that this can be further clarified within the redline text. We recommend that the following (please see red text below) be included as part of the original redline text within BSCP514, section 9.3: **the NHHMOA shall maintain a set of Auxiliary Meter Technical Details and shall ensure that whenever a D0150 is required to be sent or processed by the NHHMOA in accordance with this BSCP, the data in the Dxxx Auxiliary Meter Technical Details flow is also sent or processed successfully for that Metering System.** The NHHMOA shall be responsible for

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			For which role is your organisation impacted? LDSO, Supplier, MOA, NHHDC **Please state what the impact is -** There will be both system and process changes required. **Please explain the lead time** - We support the Feb 2011 implementation date. **Would implementation in the proposed Release have an adverse impact on your organisation?** No **Any other comments** - As stated above, we agree with the justification and support the aim of the CP. With the adoption of the changes stated above we would have no hesitation in fully supporting the CP.	backfilling data for all Metering Systems impacted by the Dxxx flow.
British Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is -** Update to processes **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-
E.ON UK Energy Services Limited	Neutral	Yes	**Agree change comment** - We have significant concerns relating to the appropriateness of the new flow and as such are reluctant to support this change however if a participant determines that this flow is the solution they wish to adopt then unless the requirement to utilise this flow is incorporated into the BSCPs it is unlikely that we will amend our systems to accommodate this flow unless that participant is willing to meet the costs of such an amendment. **For which role is your organisation impacted?** MOA & NHHDC **Please state what the impact is -** Development of system updates and associated procedures. **Please explain the lead time** - We are highly (with others) dependent on the development of an appropriate solution by an external provider over whom we have little direct control.	-

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Would implementation in the proposed Release have an adverse impact on your organisation? We will incur significant costs for little perceived benefit	
British Gas	Yes	Yes	**For which role is your organisation impacted?** Supplier **Please state what the impact is** - System changes to process new flow **Would implementation in the proposed Release have an adverse impact on your organisation?** No	-
IMServ	Yes	Yes	**For which role is your organisation impacted?** MOA, NHHDC **Please state what the impact is** - Sending and processing of new flow **Would implementation in the proposed Release have an adverse impact on your organisation?** Potentially, however the new flow itself has already been approved and therefore we already have knowledge of the changes being made.	-
Scottish & Southern Energy	Yes	Yes	**For which role is your organisation impacted?** Supplier, Party Agents **Please state what the impact is** - This is a significant change to our systems and processes. **Please explain the lead time** - We believe that this would be a substantial change to our Customer and MOP systems and processes to accommodate the new flow and therefore anticipate that it would take 12- 15 months to allow for our IT scheduling. **Would implementation in the proposed Release have an adverse impact on your organisation?** We may not be compliant. See our response above. **Associated costs** - We estimate significant costs to make the necessary changes to our systems and processes. **Any other comments** - As far as we understand from the April MDB, there appears to be no requirement for the	**-**

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Organisation	Agree?	Impacted?	Comments	ELEXON Response
			Distributor to receive this flow and, therefore, there should be no need to make any changes to BSCP515 (as redlined Attachment C). This also means that the instance of MOA to Distributor needs to be removed from the flow as Distributors would not want unnecessary flows – expect that this would require a change to the DTC.	
NPower Limited	Yes	Yes	**For which role is your organisation impacted?** Suppler and Supplier Agents **Please state what the impact is** - Impact on systems and processes. **Would implementation in the proposed Release have an adverse impact on your organisation?** A special meeting with Meter Operators is being held in July to discuss the implications of the package of changes to support this dataflow, but early implications are that the February implementation date will be challenging. **Associated costs** - Costs are unknown at this time. **Any other comments** - No	-
Bglobal Metering	Yes	Yes	**For which role is your organisation impacted?** NHHDC & NHHMO **Please state what the impact is** - The cost of implementation and management of the information in both the NHHDC and NHHMO systems, further to this we would need to analyse the current meters installed in the field to back-fill the NHHMO and NHHDC systems with this information. **Associated costs** - at this time the costs and timescales for such development have not been fully assessed but will run into £10,000s.	-

We did not receive any comments on the redline text.

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Appendix 2: New Draft Change Proposals and Change Proposals

DCP/CP	CVA/ SVA	Title	Description	Raised
CP1336	SVA	UMSO Adjustment of EACs and Pseudo HH Units based on Physical Audit Findings	The Proposer believes the settlement of electricity is entirely dependent on the accuracy and veracity of customer's inventory submissions, which can be inaccurate and updates aren't always readily provided. This CP would introduce a technique to correct Settlement for UMS consumption promptly, by using the physical audit results to address the difference between the Estimated Annual Consumption and actual consumptions.	02/07/2010
CP1337	SVA/ CVA	Improvements to the BSC Trading Disputes Process	This CP progresses three of the 12 changes recommended by the TDC following a review of the Trading Dispute Process in 2009 The three changes are: • increasing the Disputer Materiality Threshold of a Trading Query/Dispute; • clarifying what an 'affected party' is; and • include the need for the raising Party to indicate whether they are claiming exceptional circumstances and provide supporting evidence.	02/07/2010
CP1338	SVA	Guidance for Complex Sites - Network Flows affecting Settlement Meter Readings	This CP is proposing that extra guidance is added into BSCP502 and BSCP514 in the form of two additional examples of complex sites where Network flows affect Settlement Meter Readings.	02/07/2010

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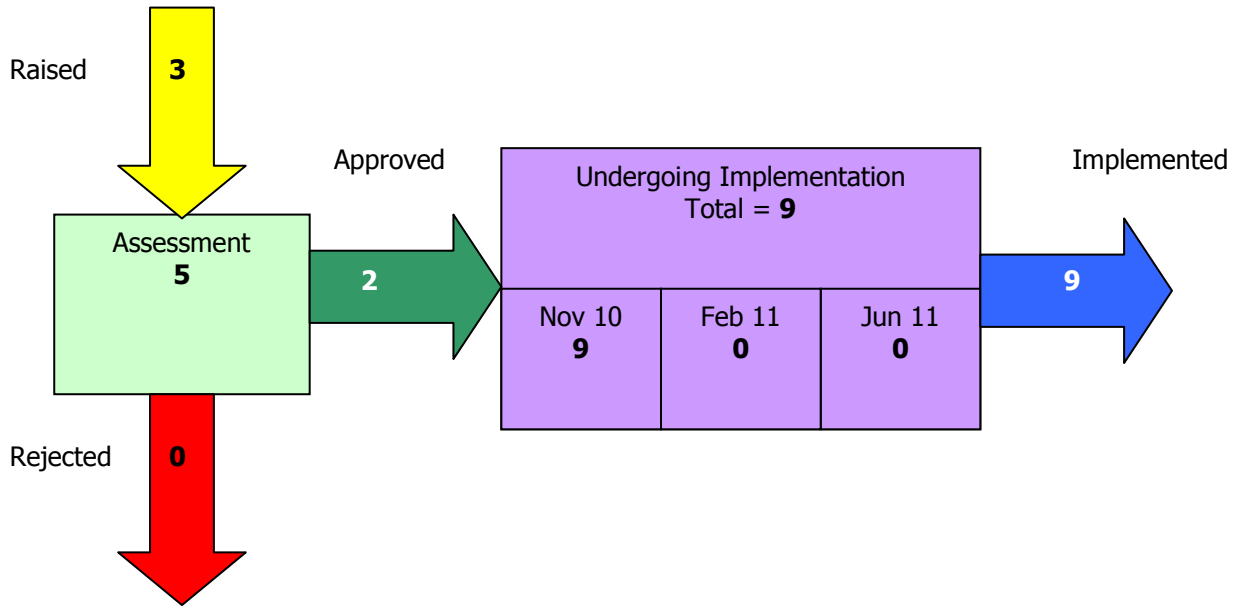
Appendix 3: Summary of Open Change Proposals

There are currently **9** open CPs, the ISG owns **1** CP, the ISG and SVG co-own **5** CPs, and the SVG own the remaining **3** CPs. **3** new CPs have been raised since the last ISG meeting.



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.

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Appendix 4: BSC Releases

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.

Key
P = Modification Proposal number
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

	Pending CPs and Modifications	Approved CPs and Modifications	Updates
June 2010 Scope (Imp. Date 24 Jun 10)		**1309, 1311*, 1316, 1317, 1318, 1323, 1324, 1326, 1332**	The final scope of the June 2010 Release included nine approved CPs and no Modifications. The Release was implemented on schedule on 24 June 2010.
Nov 2010 Scope (Imp. Date 4 Nov 10)	**1337**	**1267, 1315, 1325**, 1327, 1328, 1329, 1330, 1331, 1333** P243 Alt✓, P244 Alt✓	The scope of the November 10 Release contains two Modifications and nine Change Proposals. P243 'Publication of Generator Forward Availability by Fuel Type' and P244 'Provision of BritNed Data to BMRS' were both approved on 21 January 2010 for inclusion in the Release. Both the Application Management and Development (AMD) and Business Process Operator (BPO) service providers have commenced work on the Release and are progressing to plan. One CP, which impacts PARMS software, will be implemented on 1 November 2010. Changes to Code Subsidiary Documents also impacted by this CP will become effective on this date. All other changes will be implemented on 4 November 2010.
Feb 2011 Scope (Imp. Date 24 Feb 11)	**1334, 1335, 1336, 1338**		No CPs or Modifications have been approved for the Feb 11 Release yet.
Standalone Releases	P229 Pro×/Alt× P255 Pro ✓/Alt×		

* Changes to BSCP504 as a result of the CP1311 solution was implemented in the June 10 Release. All other changes resulting from CP1311 were implemented in the February 10 Release.

** CP1325 has been approved to be implemented on the 1 November 2010, but is included in the November 10 Release.

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