

Draft MODIFICATION REPORT for Modification Proposal P153 Additional Requirements to Support Competition in New and 'Out-of-Area' Distribution Networks

Prepared by: BSCCo

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This document has been distributed in accordance with Section F2.1.10¹ of the Balancing and Settlement Code.

RECOMMENDATIONS

The Balancing and Settlement Code Panel recommends that:

- **the Proposed Modification P153 should not be made; and**
- **no Code change is required to effect P153 hence no Implementation Date is suggested.**

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¹ The current version of the Balancing and Settlement Code (the 'Code') can be found at www.elexon.co.uk/ta/bsc/el_docs/bsc_code.html

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SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

The following parties/documents have been identified as being potentially impacted by Modification Proposal P153.

Parties	Sections of the BSC	Code Subsidiary Documents
Suppliers <input checked="" type="checkbox"/>	A <input type="checkbox"/>	BSC Procedures <input checked="" type="checkbox"/>
Generators <input type="checkbox"/>	B <input type="checkbox"/>	Codes of Practice <input type="checkbox"/>
Licence Exemptable Generators <input type="checkbox"/>	C <input type="checkbox"/>	BSC Service Descriptions <input type="checkbox"/>
Transmission Company <input type="checkbox"/>	D <input type="checkbox"/>	Service Lines <input checked="" type="checkbox"/>
Interconnector <input type="checkbox"/>	E <input type="checkbox"/>	Data Catalogues <input checked="" type="checkbox"/>
Distribution System Operators <input checked="" type="checkbox"/>	F <input type="checkbox"/>	Communication Requirements Documents <input type="checkbox"/>
Party Agents		
Data Aggregators <input checked="" type="checkbox"/>	G <input type="checkbox"/>	Reporting Catalogue <input type="checkbox"/>
Data Collectors <input checked="" type="checkbox"/>	H <input type="checkbox"/>	MIDS <input type="checkbox"/>
Meter Operator Agents <input checked="" type="checkbox"/>	J <input type="checkbox"/>	Core Industry Documents
ECVNA <input type="checkbox"/>	K <input type="checkbox"/>	Grid Code <input type="checkbox"/>
MVRNA <input type="checkbox"/>	L <input type="checkbox"/>	Supplemental Agreements <input type="checkbox"/>
BSC Agents		
SAA <input type="checkbox"/>	M <input type="checkbox"/>	Ancillary Services Agreements <input type="checkbox"/>
FAA <input type="checkbox"/>	N <input type="checkbox"/>	Master Registration Agreement <input type="checkbox"/>
BMRA <input type="checkbox"/>	O <input type="checkbox"/>	Data Transfer Services Agreement <input type="checkbox"/>
ECVAA <input type="checkbox"/>	P <input type="checkbox"/>	British Grid Systems Agreement <input type="checkbox"/>
CDCA <input type="checkbox"/>	Q <input type="checkbox"/>	Use of Interconnector Agreement <input type="checkbox"/>
TAA <input type="checkbox"/>	R <input type="checkbox"/>	Settlement Agreement for Scotland <input type="checkbox"/>
CRA <input type="checkbox"/>	S <input type="checkbox"/>	Distribution Codes <input type="checkbox"/>
Teleswitch Agent <input type="checkbox"/>	T <input type="checkbox"/>	Distribution Use of System Agreements <input type="checkbox"/>
SVAA <input type="checkbox"/>	U <input type="checkbox"/>	Distribution Connection Agreements <input type="checkbox"/>
BSC Auditor <input type="checkbox"/>	V <input type="checkbox"/>	BSCCo
Profile Administrator <input type="checkbox"/>	W <input type="checkbox"/>	Internal Working Procedures <input checked="" type="checkbox"/>
Certification Agent <input type="checkbox"/>	X <input type="checkbox"/>	Other Documents
MIDP <input type="checkbox"/>		Transmission Licence <input type="checkbox"/>
TFLA <input type="checkbox"/>		
Other Agents		
SMRA <input checked="" type="checkbox"/>		
Data Transmission Provider <input type="checkbox"/>		

X = Identified in Report for last Procedure
N = Newly identified in this Report

Cost of implementing Proposed Modification:	n/a
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1 DESCRIPTION OF PROPOSED MODIFICATION AND ASSESSMENT AGAINST THE APPLICABLE BSC OBJECTIVES

1.1 Modification Proposal

Modification Proposal P153 "Additional Requirements to Support Competition in New and 'Out-of-Area' Distribution Networks" ("P153") was raised on 01 December 2003 by Npower Ltd.

P153 seeks to provide a robust process for the migration of Supplier Volume Allocation (SVA) Metering Systems between Licensed Distribution System Operators (LDSOs). The Proposer believes that several issues arise from the implementation of Modification Proposal P62 "Changes to Facilitate Competitive Supply on the Networks of New Licensed Distributors" ("P62"). In particular the lack of provision of a robust process for the change of distribution network ownership and for the transfer of Metering Systems from registration under interim registration arrangements to P62 compliant registration.

The Proposer identified several issues associated with transferral of Metering Systems it believes are problematic:

- It requires the creation of new SVA Metering Systems (MPANs) in the new Supplier Meter Registration Service (SMRS) and termination of the old ones in the old SMRS (referred to as a "Virtual Disconnection and Reconnection process"), which could give rise to confusion for customers, possible erroneous registrations and the potential risk of the meters not being taken into Settlement or double counted;
- The existing processes for Disconnection and Reconnection rely on "physical initiating events" i.e actual energisation or de-energisation, which will not occur in this instance;
- The responsibilities for the transfer process (as between SMRSs) are unclear;
- The necessary data flows to support an associated Change of Supplier and/or Change of Agent(s), which might well need to be supported if there was a coincident Change of Tenancy are not provided in a transferral process;
- Import/Export sites and Related MPANs are not dealt with adequately in a transferral process.

In addition the Proposer claims that the lack of a properly defined process could result in different (and independent) market participants using different and possibly incompatible processes, with the risk that they would not work.

The Modification Proposal suggests that a role of "Transfer Co-ordinator" is required, as has been used in the past, and suggests that BSCCo is a suitable candidate for this function.

In addition the Proposer suggests that if the changes required to effect this transferral were too complex, then a modified form of the "fostering" type arrangement used as an interim measure for customers on new networks prior to P62 implementation, could be used as an enduring solution.

The Proposer believes that P153 better facilitates:

- Applicable BSC Objective (c), promoting effective competition in the generation and supply of electricity and (so far as is consistent therewith) promoting such competition in the sale and purchase of electricity – by reducing the risks and associated cost of supplying customers on the affected networks (and potentially embedded generation on these networks); and

Applicable BSC Objective (d), efficiency in the implementation and administration of the balancing and settlement arrangements – by ensuring responsibilities for transfer related processes are clear, and reducing the risk and cost of problem resolution/administration and the risks to Settlement.

At the Supplier Volume Allocation Group (SVG) meeting on the 02 December 2003 (see annex 2 for the SVG Headlines), the SVG considered the need to establish additional requirements regarding the migration of metering systems under Approved Modification P62. A Change Proposal (CP1026 "Issues associated with the registration of Metering Systems on existing "New Distribution Networks" and transfer to P62 compliant arrangements") has already been raised on this issue and the SVG concluded that:

- A Code Modification was unnecessary;
- The drafted Change Proposal should be progressed;
- Providing additional information on the P62 migration processes would be beneficial;
- The information required is a definition of the P62 Migration Process;
- Specifying this information would not subvert the provisions of the Code, nor impose additional material obligations or restrictions (Section F3.1.2);
- The required information would most appropriately be defined in Code Subsidiary Documentation (e.g. defining a new SMRS to SMRS Migration Process in the relevant BSCP); and
- The information should, where at all possible, be added by amending existing Code Subsidiary Documents.

The Initial Written Assessment (IWA) was presented to the Panel at its meeting on 11 December 2003. The Panel agreed that no Code Modification was required and that the issues could be resolved via the Change Proposal process. The Panel thus recommended that P153 proceed directly to the Report Phase with a recommendation that it be rejected.

1.2 Proposed Modification

There was no Assessment Procedure and therefore details of the proposed Modification are as outlined within the Modification Proposal.

1.3 Issues raised by the Proposed Modification

There was no Assessment Procedure and therefore issues raised by the Proposed Modification are as outlined within the IWA, namely that BSCCo believe that a Change Proposal is the most appropriate route to resolve the issues outlined in the Modification Proposal.

1.4 Assessment of how the Proposed Modification will better facilitate the Applicable BSC Objectives

There was no Assessment Procedure and therefore no Modification Group analysis on how the Proposed Modification will facilitate the Applicable BSC Objectives.

1.5 Modification Group's cost benefit analysis of Proposed Modification

There was no Assessment Procedure and hence no cost benefit analysis has been performed

1.6 Alternative Modification

There was no Assessment Procedure and therefore no Alternative Modification was developed.

1.7 Governance and regulatory framework assessment

BSCCo is of the opinion that, were P153 to be implemented, there would be no wider implications of P153 in the context of the statutory, regulatory and contractual framework within which the Code sits.

2 RATIONALE FOR PANEL'S RECOMMENDATIONS

The Panel recommended after presentation of the Initial Written Assessment that P153 proceed directly to Report Phase. This was due to the fact that the Panel agreed with the opinion of BSCCo and the SVG (annex 2) that the issues stated in P153 did not require a Code Modification but could be resolved via a Change Proposal, CP1026 which has already been raised.

Neither a legal text nor an Implementation Date was provided since no Sections of the Code required amendment. The Authority concurred with this approach.

3 IMPACT ON BSC SYSTEMS AND PARTIES

An assessment has been undertaken in respect of BSC Systems and Parties and the following have been identified as potentially being impacted by the Proposed Modification.

3.1 BSCCo

An assessment has been undertaken in respect of BSCCo and the following have been identified as potentially being impacted by the Modification Proposal.

Area of Business	Potential Impact of Proposed Modification
BSCCo Systems and Procedures	The suggested use of BSCCo as a transfer co-ordinator may require changes depending on the level of involvement BSCCo has in the transfer process.
Other (e.g. costs, staffing, etc.)	The suggested use of BSCCo as a transfer co-ordinator may require extra staffing.

3.2 BSC Systems

The following have been identified as potentially being impacted by the Modification Proposal.

System / Process	Potential Impact of Proposed Modification
Registration	Co-ordination between Supplier Meter Registration Agents (SMRAs) during the migration process.
Settlement	Ensure Settlement data is not lost upon change of Registration

3.3 Parties and Party Agents

There would need to be some co-ordination between SMRAs during the migration process.

4 IMPACT ON CODE AND DOCUMENTATION

4.1 Balancing and Settlement Code

No Sections of the Code have been identified as being impacted by the Modification Proposal.

4.2 Code Subsidiary Documents

The following documents have been identified as potentially being impacted by the Modification Proposal.

Item	Potential Impact of Proposed Modification
BSCP501 'Supplier Meter Registration Service'	All the BSCPs relating to Supplier Agents, Distributors and SMRS are potentially affected – specific requirements may be contained in this.
BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	As for BSCP 501.
BSCP503 'Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	As for BSCP 501.
BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	As for BSCP 501.
BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	As for BSCP 501.
BSCP514 'SVA Meter Operation for Metering Systems Registered in SMRS'	As for BSCP 501.
BSCP515 'Licensed Distribution'	A major part of the explanation of the transferral process would be contained within this BSCP.
PSL110 'SVA Meter Operations'	All the PSLs relating to Supplier Agents, Distributors and SMRS are potentially affected.
PSL120 'NHHDC'	As for PSL 110.
PSL130 'HHDC'	As for PSL 110.
PSL140 'NHHDA'	As for PSL 110.
PSL150 'HHDA'	As for PSL 110.
PSL160 'SMRS'	As for PSL 110.

4.3 BSCCo Memorandum and Articles of Association

No changes would be required to BSCCo Memorandum and Articles of Association as a consequence of P153.

4.4 Impact on Core Industry Documents and supporting arrangements

No impact is envisaged to core industry documents and supporting arrangements.

5 SUMMARY OF CONSULTATION RESPONSES

Consultation question	Respondent agrees	Respondent disagrees	Opinion unexpressed
Do you agree with the Panel's views on P153 and the provisional recommendation to the Authority contained in the draft Modification Report that P153 should not be made?			
Are there any further comments on P153 that you wish to make?			

5.1 Summary of the consultation responses

[Insert a summary of the consultation responses submitted by Parties and interested third parties during the consultation undertaken in respect of the Proposed Modification. Include consultation responses from all stages of this process – this is a stand-alone document.

Note: Remember to emphasise strength of argument.]

5.2 Comments and views of the Panel

[Include commentary agreed by the Panel on the views of the consultees. This should set out majority/minority views if necessary.]

6 SUMMARY OF TRANSMISSION COMPANY ANALYSIS

No Transmission Company analysis was undertaken.

7 SUMMARY OF EXTERNAL ADVICE

No external advice was sought.

8 IMPLEMENTATION APPROACH

No implementation approach was prepared.

9 DOCUMENT CONTROL

9.1 Authorities

Version	Date	Author	Reviewer	Change Reference
0.1	15/12/03	Dena Harris	Change Delivery	P153MR

9.2 References

Ref	Document	Owner	Issue date	Version

ANNEX 1 CONSULTATION RESPONSES

ANNEX 2 SVG HEADLINE REPORT 2 DECEMBER 2003

See item 4.3 Migration Issues Working Group (MIWG) Update SVG/34/468

Headline Report

Meeting name	SUPPLIER VOLUME ALLOCATION GROUP (SVG)
Meeting no.	34
Date of meeting	2 December 2003

This note sets out the headlines and key decisions of the 2 December 2003 meeting of the SVG.

SECTION I: INTRODUCTION

Panel 69

SVG NOTED the following decisions of the Panel:

Changes to svg membership (69/023)

The Supplier Volume Allocation Group (SVG) has recently had a resignation. This paper sought the Panel Industry Members endorsement of a new appointment to the committee.

- NOTED the resignation from the SVG of Tony Barton (Powergen), Industry Member.
- ENDORSED the proposed appointment of Kevin Oxbury (Powergen) as an Industry Member.
- NOTED that there is now an Industry Member Alternative vacancy on the SVG.
- NOTED that ELEXON continues to seek further nominations for the ISG and SVG Panel Committees to provide a pool of nominations from which to fill this vacancy and replace future resigning members and alternates.

SECTION II: DISPUTES RUNS – ERREONEOUSLY LARGE EACs/AAs

Supporting Information for TDC Decision – Disputes Final Runs SVG/34/460

SVG:

- NOTED the Supplier responses received as detailed in of paper TDC 56/1;
- NOTED the cleansing activities that have been undertaken and the current market status based upon the monitoring information contained within paper TDC 56/1;
- SUPPORTED that, where no exit date have been set, the data is suitable for inclusion in Post Final Settlement Runs for Settlement Dates from 08 January 2002 to 11 February 2002 and a further 2 week contingency comprising Settlement Dates 12 February 2002 to 25 February 2002 based on the results of the cleansing activities and Supplier responses; and
- NOTED that TDC will be advised of the above and should consider this in authorising settlement data for use in Post Final SVA Runs.

SECTION III: SVA DECISION PAPERS**Proposed processes to mitigate risk to settlement of a NHHDA failure SVG/34/461**

SVG:

- NOTED the significant potential error arising from using the current SVA default rules as observed in Appendix A and B;
- NOTED the extreme indicative error created through double counting of consumption as a result of the Suppliers seeking to establish replacement NHHDA's whilst the SVA defaults are being applied as displayed in Appendix C;
- NOTED the significant reduction in double counting error from using a Synthetic SPM rather than the current SVA defaults as shown in Appendices E, F and G;
- NOTED that a Modification to the BSC would be required for a Synthetic SPM process to be utilised in the event of a NHHDA failure;
- AGREED that the use of Synthetic SPMs would significantly reduce the error caused by a NHHDA failure;
- AGREED that the PCAEACS currently held in MDD should be revised (subject to clarification of the difference between GSP Group Profile Class Average EACs and GSP Group Profile Class Default EACs).

Approval of Changes for P99 BSCP 531 and 535 SVG/34/467

SVG:

- APPROVED the changes to BSCP 531 and BSCP 535.

SVA Change Proposals for Approval SVG/34/463

SVG:

- APPROVED CP983, CP984, CP1003, CP1004 and CP1005 for implementation into an appropriate future release.

Scope for February 2004 SVA Release SVG/34/469

SVG:

- AGREED the scope of the February 2004 SVA Release as set out in this paper, subject to a successful Impact Assessment of the batch;
- AGREED that the February 2004 SVA Release should proceed under the control of the ELEXON

SVA Programme;

- ❑ NOTED the proposed Implementation Date for the February 2004 SVA Release of 27 February 2004; and
- ❑ NOTED that a paper seeking approval for the final red-lined changes relating to CP904, CP941, CP969, CP1003, CP1004 and CP1005 will be presented to SVG.

Treatment of Unoccupied Sites within Settlements SVG/34/470

SVG:

- ❑ NOTED the proposed treatment of unoccupied sites within Settlements.
- ❑ INVITED Elexon to confirm the proposed solution is consistent with the BSC, and if not to consider potential options for Modification Proposals.

SECTION IV: SVA INFORMATION PAPERS

Status of all Open SVA Change Proposals SVG/34/464

SVG:

- ❑ NOTED the status and progress of all SVA CPs.

New Metering Technology Working Group Progress Report SVG/34/465

SVG:

- ❑ NOTED the continued developments of Codes of Practice 9 and 10;
- ❑ NOTED the action of issues identified during industry walkthroughs;
- ❑ NOTED the preparation of a submission in support of the removal of the requirement for 2 yearly visits to metering where AMR has been installed;
- ❑ NOTED the continuation of reviewing implications for metering arising from distributed generation; and
- ❑ NOTED the continuation of support to the BEAMA project for the monitoring of domestic generation.

Migration Issues Working Group (MIWG) Update SVG/34/468

SVG:

- ❑ NOTED the discussions of the MIWG, MDB and MEC to date regarding this issue; and

- ❑ NOTED that a Change Proposal has been raised to request further ELEXON investigation into the Settlement requirements of Distribution asset transfer.
- ❑ AGREED that a BSC Modification would not be necessary;
- ❑ SUPPORTED that an amendment to original BSCP documentation would be required; and
- ❑ ELEXON CONFIRMED that they would investigate which documentation will need to be amended.

Energisation Status Project Update (verbal)

SVG:

- ❑ NOTED the update on the Energisation Status Report.

Trading Operations Report 69/002

SVG NOTED the Report.

Change Report 69/003

SVG noted the Report.

Entry Processes Status Report SVG/34/466

SVG noted the Report.

SECTION V: ANY OTHER BUSINESS

Matters Arising

SVG:

- ❑ NOTED that the transfer process for directly connected customers, from de-energisation to re-energisation currently takes 30 days. Customers have expressed a desire to formalise the process and ELEXON plan to raise a Change Proposal to reduce the timescale of the process to 5 days.
- ❑ NOTED that an SVG meeting in January may be required to approve the Service Descriptions for the Technical Assurance Agent (TAA) and the Profile Administration Agent (PAA), prior to the January Panel meeting. Alternatively, the TAA and PAA will be circulated to the Group via ex-committee.
- ❑ NOTED the Supplier Agent Forum and the Supplier Hub Management Forum paper, which was distributed at the meeting.

SECTION VI: PAPERS CONSIDERED BY CORRESPONDENCE

Approval of Code Subsidiary Documents for the SVA November 03 Release (Part 2) SVG/34/459

SVG:

- ❑ NOTED the process for the development, review and approval of changes to the Code Subsidiary Documents for CP923; and
- ❑ APPROVED the changes to BSCP38 and BSCP509 for the November 03 Release (Part 2), with an Implementation Date of 27 November 2003.

DATE OF NEXT MEETING: 06 January 2004, 10:00am, ELEXON, 4th Floor, 350 Triton Square, London NW1