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Modification P107: 'Initial Assessment of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Dispute' Requirements Specification

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1.2	17/01/03	GSMG		Ensure consistency with GSMG requirements
1.3	24/01/03	Change Delivery		P63 decision included and updated with GSMG review comments
2.0	28/01/01	Industry		Industry consultation and Detailed Level impact assessment

b   Distribution

Name	Organisation
GSMG	Various
BSC Parties	Various
Party Agents	Various
Relevant BSC Agents	Various

c   Related Documents

Reference 1	Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes' (30 October 2002)
Reference 2	Initial Written Assessment of Modification Proposal P107 'Initial Assessment Of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Disputes (P107IR V1.0, 8 November 2002)

Reference 3	Modification Report, Modification Proposal P61 – Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs (MR 44/004 V2.0, 17 May 2002)
Reference 4	'Respecification of Trading Data' Requirements Specification (P103AS V1.0, 19 November 2002)
Reference 5	BSCP40 'Change Management'
Reference 6	Modification Report, Modification Proposal P63 - Change Of Contract Management of MPAN's For Data Collector, Data Aggregator And Meter Operator (P063RC, V0.3, Issue 1, 28 October 2002)
Reference 7	Ofgem decision letter, P78 'Revised Definitions of System Buy Price and System Sell Price' (Ref: MP No: P78, 9 September 2002)
Reference 8	Modification Report, Modification Proposal P62 - Changes to Facilitate Competitive Supply on the Networks of New Licensed Distributors (P062RR, V1.0, Issue Final, 22 July 2002)
Reference 9	Version 1.0, Modification P107: 'Initial Assessment of Modification Proposal P107 - Data Retention Requirements for Post-Final Trading Dispute' Requirements Specification, 13 December 2002

d   Intellectual Property Rights and Copyright

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1 INTRODUCTION

1.1 Background and Scope

This Requirements Specification for Modification Proposal P107 'Data Retention Requirements for Post-Final Trading Disputes' (P107) (Reference 1) defines the requirements for implementation of P107 and forms the basis for an impact assessment of the implementation and associated issues should this Modification Proposal be adopted. No Alternative Modification Proposal is considered within this Requirements Specification.

P107 was raised by SSE Energy Supply Limited on 30 October 2002, and the Initial Written Assessment (Reference 2) was considered by the Panel at its meeting of 14 November 2002, where the Panel agreed to submit P107 to a three month Assessment Procedure.

P107 seeks to revise the cut-off points for raising a Post Final Trading Query / Trading Dispute and undertaking the Post-Final Settlement Run and Extra-Settlement Determination. In addition, P107 seeks to include specific data retention obligations in support of the Post-Final Trading Disputes process. Further more P107 seeks to specify appropriate transfer for this retained data on change of Party Agent (specifically Meter Operator Agents and Data Collectors obligations).

On the basis that P107 may impact the majority of the industry and is a governance related Modification Proposal, it is being progressed by the Governance Standing Modification Group (GSMG) (with appropriate expertise being provided by the Settlement Standing Modification Group (SSMG), the Volume Allocation Standing Modification Group (VASMG) and the Trading Dispute Committee (TDC)).

The GSMG met on 22 November 2002, during which time a number of requirements were determined and agreed. Version 1.0 of the Requirements Specification (Reference 9) was issued for consultation to Parties on 9 December 2002 and in parallel was issued to the Supplier Agent Forum (SAF), the Software Technical Advisory Group (STAG) and the Supplier Meter Registration Agents (via Gemserv) for consideration.

On 14 January 2003, a second meeting of the GSMG was held, to discuss the responses provided by industry members. This version of the Requirements Specification includes the refined requirements that were agreed by the GSMG. This version of the Requirements Specification forms the basis of the second consultation and also a Detailed Level Impact Assessment (DLIA).

The TDC are currently debating a number of issues relating to the use of Extra Settlement Determinations to resolve Trading Disputes with a paper being formally presented at the TDC meeting in January 2003. Currently Post-Final Trading Disputes are being corrected at 24 months after the Settlement Day; the proposals within this Requirements Specification are therefore more than sufficient to support the current Trading Dispute correction process.

1.2 Purpose and Structure of Document

The primary purpose of this document is to specify the refined requirements for the requisite changes to central services, BSC Agents, Parties and Party Agents and to the Code, Code Subsidiary Documents and industry documentation, in sufficient detail to enable all impacted BSC Agents, Parties, Party Agents and documentation owners to provide an impact assessment of the changes required to support P107.

A particular purpose of this document is to specify BSCCo's (representing GSMG) requirements for the requisite change to central services functionality in sufficient detail to allow the BSC Agents to provide a detailed assessment of the following:

– An assessment of the cost of any changes to the contractual baseline.

– An assessment of the time required to implement the changes.

– A proposed testing strategy for the changes.

– A proposed release and acceptance strategy (e.g. whether to phase the implementation to provide a quick solution to urgent operational issues).

For the purposes of this assessment, the BSC Agents should assume that the changes will be implemented as a standalone development project managed by BSCCo.

The document is structured as follows:

– Section 2 specifies the required functionality for the changes defined within P107.

– Section 3 specifies BSCCo's requirements for involvement in the design and testing process.

1.3   Glossary

The following acronyms have been used throughout this document:

AA	Annualised Advance
BMRA	Balancing Mechanism Reporting Agent
BMRS	Balancing Mechanism Reporting Service
BSC	Balancing and Settlement Code
BSCCo	Balancing and Settlement Code Company
BSCP	Balancing and Settlement Code Procedure
CDCA	Central Data Collection Agent
CRA	Central Registration Agent
CVA	Central Volume Allocation
DLIA	Detailed Level Impact Assessment
EAC	Estimated Annual Consumption
ECVAA	Energy Contract Volume Aggregation Agent
ECVNA	Energy Contract Volume Notification Agent
EPC	Entry Process Co-ordinator
FAA	Funds Administration Agent
GSMG	Governance Standing Modification Group
HHDC	Half Hourly Data Collector
MDD	Market Domain Data
MVNRA	Metered Volume Notification Reallocation Agent
NHHDA	Non-Half Hourly Data Aggregator
SAA	Settlement Administration Agent
SACR	Self Assessment Certification Return
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
SSMG	Settlement Standing Modification Group

SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
TAA	Technical Assurance Agent
TDC	Trading Dispute Committee
VASMG	Volume Allocation Standing Modification Group

2 REFINED REQUIREMENTS SPECIFICATION FOR MODIFICATION PROPOSAL P107

2.1 Requirements Specification Overview

This version of the Requirements Specification highlights the conclusions reached by the GSMG on 14 January 2003 following detailed analysis of the first industry consultation and therefore the refined requirements for P107.

Where the sub-sections below refer to a Requirement number, these Requirement numbers cross-reference to Section 4 , which summaries the requirements and the responsible industry participants.

2.2 Raising Post-Final Settlement Run Trading Query / Trading Dispute

The Code (Section W1.2.5) states that a Party can raise a Post-Final Trading Dispute up to 36 months after the Settlement Day. In practice, Parties raise Post-Final Trading Disputes within a much shorter timescale.

P107 therefore proposes that the Code is modified so that Parties will be able to raise a Post-Final Trading Query[1] up to 20 months after the Settlement Day (this allows a Party six months after the Final Settlement Run to identify and raise a Trading Query with the TDC).

The GSMG have assessed P107 and believe that reducing the timescale by when a Party can raise a Post-Final Trading Query is desirable on the basis that a Party will in practice determine if there is a data error problem near or soon after the Final Settlement Run. Therefore the GSMG believe that reducing the timescale will bring the Code closer to existing industry practice, and as such the impact of making the change is expected to be less than the impact of leaving the Code unchanged. There may be an impact on systems and/or processes used by Parties, Party Agents and BSC Agents.

Any Trading Query received which partially exceeds the 20-month cut-off period will be rejected by the TDC. In such a circumstance, the Party should choose whether or not a revised Trading Query should be raised covering any Settlement Days up to the 20-month cut-off period.

Any Trading Query notified to the TDC after the 20 month cut-off period, will in normal circumstances be rejected by the TDC. The TDC may however be able to accept such late Trading Queries under exceptional circumstances and following agreement by the Panel (this is consistent with the principles outlined in paragraph 2.2.4 of Section U of the Code).

Should P107 be implemented there is potential for Parties to loose the right to raise Trading Queries that are between 20 and 36 months old, due to the shortening of the cut-off for raising such Trading Queries. It is proposed that the TDC would exercise the ability to accept late Trading Queries to accept those that are between 20 and 36 months old for a period of 3 months after implementation of P107. It was the view of the GSMG that this would give Parties sufficient time to raise any Trading Queries relating to Settlement Days within the 20 to 36 month period. It should be noted that this 3 month timescale is in line with the time period utilised at NETA Go-Live.

GSMG Requirement Summary:

- **A Trading Query can be raised up to 20 months after the Settlement Day to which it relates. [REQ 1]**

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[1] Disputes are first raised as Trading Queries and are then escalated to Dispute status at the request of the Raising Party and therefore submission of the Trading Query is required within 20 months of the Settlement Day to which it relates.

- Where a Trading Query is raised covering a number of Settlement Days, all Settlement Days in the disputed period will satisfy the 20 month cut-off period. [REQ 2]

- TDC may accept late Trading Queries under exceptional circumstances and following agreement by the Panel. [REQ 3]

- TDC shall accept Trading Queries , relating to Settlement Days between 20 and 36 months prior to implementation, for three months after implementation of P107. [REQ 4]

2.3   Resolution of Post-Final Settlement Run Trading Disputes (Post-Final Settlement Run and Extra-Settlement Determination)

As stated in section 2.2, the Code specifies that the resolution of a Post-Final Trading Dispute will, in normal circumstances, occur no more than 36 months after the Settlement Day. However the Code does allow for a Trading Dispute to be resolved (following the approval of the TDC) after 36 months, using the Post-Final Settlement Run and Post-Final Volume Allocation Runs mechanisms (Section U2.2.4). Therefore the cut-off point for correcting the Trading Dispute is currently indefinite.

Following implementation of P61 'Ad Hoc Adjustments to Settlement involving material errors without resorting to Ad Hoc Settlement Runs' (Reference 3) on 10 December 2002 the mechanism for achieving Trading Dispute corrections after the Final Settlement Run will be via a Post-Final Settlement Run or an Extra Settlement Determination. No amendment however has been made to the resolution period under P61. Therefore the cut-off point for correcting the Trading Dispute will continue to be indefinite.

P107 proposes that the Code is modified so that Post-Final Settlement Run and Extra Settlement Determinations will be undertaken by 28 months after the Settlement Day. This will give the TDC, (in conjunction with BSCCo, Parties and where affected BSC Agents) eight months to resolve the Trading Dispute.

In light of the current open-ended cut-off points the TDC, BSCCo, Parties and potentially the relevant BSC Agents are required to support resolution of the Trading Dispute indefinitely as well as retaining the relevant Settlement data. The GSMG have assessed P107 and believe that these open-ended cut-off points within the Code introduce uncertainty into the industry and where possible should be removed. Following legal advice, the GSMG recognised that it may be undesirable to set a cut-off timescale on the basis that this may compromise the ability of the TDC/ Panel to reach a valid determination and may also restrict the amount of time available to correct any Trading error identified. The GSMG however agreed that most Trading Disputes would be resolved within 28 months of the Settlement Day to which they relate.

Where all the necessary valid data for resolving the Trading Dispute has been made available by the Party and any other affected industry participants to the TDC by 20 months after the Settlement Day, the TDC will resolve the Trading Dispute using a single Post-Final Settlement Run process. The Post-Final Settlement Run currently occurs at 24 months after the Settlement Day therefore P107 will require that this mechanism is made available up to 28 months after the Settlement Day.

Currently the Code (Section U2.2.4) states that:

 "No Settlement Run or Volume Allocation Run shall be carried out on any date which is more than 36 months after the Settlement Day to which such runs relate, save only that (on the recommendation of the Trading Disputes Committee and with the approval of the Panel in accordance with Section W) a Post-Final Settlement Run and Post-Final Volume Allocation Runs may be carried out after that date,

upon resolution after that date of a Trading Dispute which was raised not later than 36 months after the Settlement Day in question."

P107 proposes that this cut-off is shortened from 36 to 28 months, such that no Settlement Run or Volume Allocation Run shall be carried out on any date which is more than 28 months after the Settlement Day to which such runs relate. It is also proposed that the power of the Panel to authorise Settlement or Volume Allocation Runs beyond the cut-off be removed. The GSMG recognised that there would be a potential risk associated with the removal of the Panel's power in this area. However the Group believed that this risk would be outweighed by the certainty introduced into the Trading Disputes process. Removing the power of the Panel to authorise Settlement Runs indefinitely allows Parties and Party Agents to design efficient systems and processes around a definite timescale rather than supporting Settlement Runs indefinitely and bearing the associated costs. The GSMG's view was that Extra Settlement Determination provided a sufficiently robust method for resolving the minority of disputes that exceed the 28 month cut-off for utilising Post Final Settlement Runs.

The GSMG concluded that where the TDC is unable to resolve the Trading Dispute by 28 months after the Settlement Day due to the complexity of the Trading Dispute and / or the Post-Final Settlement Run process has been undertaken, the Extra Settlement Determination process will be used to correct the Trading Dispute. It should be noted that this would not affect the current ability of the TDC to perform an extra Settlement Determination to resolve a Trading Dispute within 28 months of the Settlement Day to which it relates.

P107 proposes minimum data retention requirements that would support resolution of a Trading Dispute for up to 40 months after the Settlement Day to which the Trading Dispute relates. The GMSG therefore concluded that it was desirable that for the small number of Trading Disputes, which were unlikely to be resolved within 40 months of the Settlement Day to which they relate, that the TDC would notify the industry accordingly. For example the TDC would notify industry of any Trading Disputes unlikely to be resolved within 40 months such that archived data relating to that Trading Dispute can be retained beyond 40 months after the Settlement Day to which it relates. The TDC will notify industry members via a BSCCo Circular of such circumstances.

The BSCCo Circular will include, but may not be limited to, the following information:

- Identify the Settlement Days affected;

- Where possible (ie. where a limited number of Metering Systems are affected), identify the Metering Systems potentially impacted by the Trading Dispute;

- Identify the timescale by when the Trading Dispute is likely to be determined upon;

- Identify the timescale by when the Trading Dispute is likely to be resolved; and

GSMG Requirement Summary:

- **Post Final Settlement Runs supported up to 28 months after the Settlement Day to which they relate. [REQ 5]**

- **Trading Disputes resolved beyond 28 months via an Extra Settlement Determination. [REQ 6]**

- **BSCCo on behalf of the TDC to notify the industry of those Trading Disputes which are unlikely to be resolved within 40 months of the Settlement Day to which they relate. [REQ 7]**

2.4 Data Retention Overview - Non Past Notification Error Applicable

The Code does not prescribe the amount, type and mechanism for data retention (other than those on the BMRA (Section V)). Parties may therefore be unclear as to how much data should be retained. Obligations to retain data by the BSC Agents are documented in the relevant Service Descriptions (and also User Requirement Specifications). In addition, obligations to retain data by the Supplier Agents are described within the relevant Party Agent Service Lines. Appendix 1 of P107 'Data Retention Requirements within Code Subsidiary Documents and other Configurable Items' (Reference 1) identifies the documents where the data retention obligations are identified and also the amount of data that is currently required to be retained.

The GSMG have considered what data retention obligations should be introduced in support of P107 and in determining the amount of data to be retained have considered a number of factors. It was felt by the GSMG that the cut-off point for data retention should:

- not compromise the Settlement timetable;

- not compromise the ability of a Trading Party to raise a Trading Query after the Final Settlement Run (up to a reasonable cut-off point);

- not compromise the Past Notification Error correction process described within Section P, paragraph 6 of the Code;

- not compromise the correction of any large Estimated Annual Consumption (EACs) / Annualised Advances (AAs);

- allow for different data retention obligations, dependent upon the market role type;

- accommodate existing industry practices;

- not compromise audit requirements; and

- not compromise the BSC financial obligations.

The GSMG believed that the data retention requirements summarised in the diagram below (Fig 1) would support the proposed Dispute time-scale (Appendix 1). Justification for the detailed specification of these requirements is included in the reminder of this document.

Fig:1 Data retention overview

Settlement Day D	D to D+14 Months	D+14 to D+28 Months	D+28 to D+40 Months	D+40 Months
	For D to D+14 months Data maintained in live operational environment	For D+14 months to D+28 months Data maintained in live operational environment	D+28 months to D+40 months Data maintained in live operational environment or archive	Post D+40 months Under normal circumstances no requirement to retain data

There may, therefore, be an impact on systems and/or processes used by Parties, Party Agents and BSC Agents.

2.4.1   Party and Party Agents Minimum Requirements

This section outlines the minimum data retention requirements for Parties and Party Agents. Parties or Party Agents directly affected by the Past Notification Error claims process will additionally be required to be compliant with section 2.6.   Parties involved in the EAC/AA correction process will also be required to comply with section 2.7. Should Parties or Party Agents be required to retain data beyond the proposed minimum of 40 months the industry shall be notified accordingly, however in light of industry experience it is not envisaged that there will be a requirement to extend the 40 month requirement.

Data Retention Amount

Both Parties and Party Agents can potentially be involved in the Trading Dispute process and as such should retain sufficient Settlement data to enable Trading Disputes to be resolved. Parties and Party Agents will therefore be required to retain Settlement related data for 40 months after the Settlement Day to which that data relates.

In the context of each BSC Party's obligation to retain 40 months of Settlement data, where the BSC Party has held it's acceded status for less that 40 months, the BSC Party will retain the data from the date of their Accession Agreement.

In the context of each Party Agent's obligation to retain 40 months of Settlement data, where the Metering System that the Party Agent has been registered for is less than 40 months old, the Party Agent will retain the data from their appointment date.

Data Retention Mechanism

Each Party and Party Agent will ensure that the Settlement data will be retained for 28 months after the Settlement Day in the live operational environment, such that a Post-Final Settlement Run can be supported. Thereafter data will be kept for a further 12 months (either using the live operational environment or an archiving mechanism) in a format which is easily retrievable and can be used, if required by the TDC, in the resolution of a Trading Dispute via an Extra Settlement Determination.

It is for each BSC Party / Party Agent to determine the mechanism for retaining the additional 12 months of Settlement data.   Where a BSC Party and Party Agent chooses to use an archiving mechanism, the archiving mechanism used should retain a copy / be able to recreate a copy of the Settlement data that was used in the live operational environment and hence used in the Settlement processes. Where an archiving mechanism is to be employed Parties and Party Agents will able to determine the optimum mechanism and frequency of archiving, providing they can support the Trading Disputes process.

Any BSC Party and / or Party Agent wishing to retain more than 40 months of Settlement data can do so, however there is no Code obligation to do so.

Archiving Frequency Issue

It was the opinion of the GSMG that, where archiving is to be employed, the frequency of archiving should not be mandated by the Code. It was recognised that this approach presents an issue relating to the accuracy of data archived. In the case of certain Trading Disputes that are being corrected outside of the Settlement process (i.e. via Extra Settlement Determination) in an ideal situation data settled at the latest Settlement Run would be used as a baseline against which to calculate monetary correction. However, unless data is copied to archive directly after the latest Settlement Run (either Reconciliation Final or Disputes Final), there is potential for the data to change prior to an archive copy being taken. This situation is most likely to occur with Metered Data, which can be constantly updated for reasons outside of Settlement thereby consequently affecting Settlement data. An example scenario, based on a weekly archiving process, is given in Fig 2.

Fig:2 Archiving Frequency Issue Overview
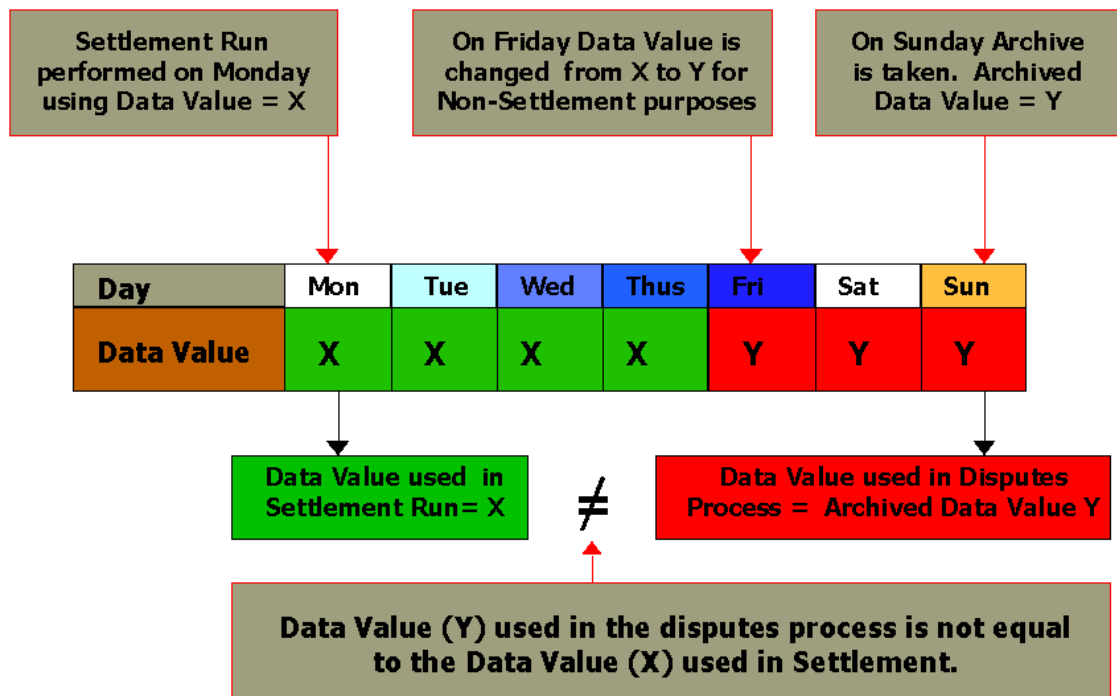
It would be possible to avoid the situation occurring if an archive copy of data is taken directly after each Settlement Run. However it is unlikely that the cost of employing such an extensive archiving process can be justified considering the relatively minor improvement in the accuracy of data entering the Trading Disputes process and taking into account the small number of Trading Disputes that would utilise the archived data. It may be more practical for archiving to take place on either a daily, weekly or monthly basis. However the optimum archiving frequency is dependent on the type of data involved. Where the data is not changing outside of Settlement the frequency of archiving is not an issue and archiving need only occur infrequently. However, where data is regularly updated outside of Settlement, the costs of a daily or weekly archiving process may be outweighed by the improvement in the quality of data entering the Trading Disputes process. It was recognised by the GSMG that the optimum frequency of archiving is dependent on the Party or Party Agent involved and the initial view of the GSMG was that the method and frequency of archiving should be left under the control of Parties and Party Agents. However it was agreed that an industry view, as to whether the potential detrimental effect on the accuracy of data entering the Trading Disputes process was outweighed by the increased costs associated with specifying a minimum archive frequency, should be obtained via consultation.

GSMG Requirement Summary:

- A total 40 months of Settlement data retained for each Settlement Day by each BSC Party and Party Agent [REQ 8].

- In the circumstance where a BSC Party has had its acceded status for less that 40 months, the BSC Party will retain the data from the date of their Accession Agreement [REQ 9].

- In the circumstance where a Party Agent has been appointed for less than 40 months, the Party Agent will retain the data from their appointment date [REQ 10].

- Each BSC Party and Party Agent will be required to retain 28 months of Settlement data in the live operational environment [REQ 11].

- A further 12 months of Settlement data will be retained by each Party and Party Agent either using the live operational environment or a data archiving mechanism [REQ 12].

- Where a Party or Party Agent uses an archiving mechanism, rather than the live operational environment, the archiving mechanism used should maintain a copy of data, which will support the resolution of a Trading Dispute via an Extra Settlement determination. [REQ 13].

2.5 Party Agent Data Transfer

It is proposed that the following Party Agents will be required to transfer all relevent Settlement data maintained in the live operational environment (typically 28 months worth) following their de-appointment:

- Data Collectors (Half Hourly and Non-Half Hourly Data Collectors)

- Supplier Volume Allocation related Meter Operator Agents (Half Hourly and Non-Half Hourly)

In the context of the Party Agent obligation to transfer 28 months of Settlement data, where the Party Agent has been appointed for less than 28 months, the Party Agent will transfer data from their appointment date. Each Data Collector (both Half Hourly and Non-Half Hourly Data Collectors) will be required to transfer all (both valid and invalid) Metered Data obtained for each relevant Settlement Register on each occasion during the preceding 28 months to the new Data Collector. Non-Half Hourly Data Collectors will additionally be required to transfer the latest values of Estimated Annual Consumption and Annualised Advance to the new Non-Half Hourly Data Collector.

Meter Operator Agents (both Half Hourly and Non-Half Hourly Data Meter Operator Agents) will be required to transfer the most recent historical Meter Technical Details, from the last 28 months, to the new Meter Operator Agent.

The GSMG recognised that there could be the potential to loose the last 12 months of archived data on transfer Party Agent and that this could have a detrimental effect on the Trading Disputes process. Therefore an industry view on whether the cost of manually transferring archived records between de-appointed Party Agents is justified by the benefit offered to the Trading Disputes process.

GSMG Requirement Summary:

- **Each Data Collector (both Half Hourly and Non-Half Hourly Data Collectors) will be required to transfer all (both valid and invalid) Metered Data obtained for each relevant Settlement Register on each occasion during the preceding 28 months to the new Data Collector [REQ 14].**

- **Non-Half Hourly Data Collectors to additionally transfer the latest values of Estimated Annual Consumption and Annualised Advance to the new Non-Half Hourly Data Collector [REQ 15].**

- **Meter Operator Agents (both Half Hourly and Non-Half Hourly Data Meter Operator Agents) required to transfer the most recent historic Meter Technical Details, from the last 28 months, to the new Meter Operator Agent [REQ 16].**

2.5.1   BSC Agents

There are currently twelve BSC Agents, under P107 minimum data retention requirements for the following six BSC Agents are specified;

- CDCA

- CRA

- ECVAA

- SVAA

- SAA

- FAA

In line with the proposed Trading Disputes timetable (Appendix 1), a minimum of 40 months of data would be retained for each Settlement Day, by each BSC Agent. Each BSC Agent referred to above will be required to support Post Final Settlement Runs for at least 28 months after any Settlement Day, followed by at least a further 12 months of Settlement data being retained to support Extra Settlement Determinations (using a data archiving mechanism agreed with BSCCo). It is intended that this minimum be introduced in support of the Trading Disputes timetable proposed under P107 (Appendix 1). It should be noted that BSCCo's actual contractual arrangements with these BSC Agents might exceed these minimum requirements if considered necessary (for example to fulfil requirements outside the Trading Disputes process).

For those BSC Agents that are or may be affected by P6 or the EAC/AA issue, different data retention obligations, detailed in Sections 2.6 and 2.7 respectively, will apply.

GSMG Requirement Summary:

- **A minimum total of 40 months of Settlement data retained by each BSC Agent [REQ 17].**

- **At least the latest 28 months of Settlement data retained in the live operational environment [REQ 18].**

- **A minimum of a further 12 months of Settlement data retained using a data archiving mechanism agreed with BSCCo [REQ 19].**

- **BSC Agents will support the P6 process as outlined in Section 2.6 [REQ 20].**

- **BSC Agents will support resolution of the EAC/AA issue Section 2.7 [REQ 21].**

2.6 P6 'Past Notification Error' Data Retention Obligations

Those Parties, Party Agents (ECVNAs and / or MVRNAs) using the Volume Notification process and a number of BSC Agents may be impacted by the Past Notification Error claims process provided for in paragraph 6 of Section P of the Code. Therefore different data retention obligations will apply for those that have submitted / or are affected by Past Notification Error claims.

These claims affect Settlement Days in the period from NETA go-live until approximately the end of May 2002. The Past Notification Error process requires that claims can be investigated, assessed and determined, appealed, and, as appropriate, rectified.

2.6.1 Data to be Retained by Parties and Party Agents

Parties have already submitted their Past Notification Error related claim information to BSCCo (as required by paragraph 6.2 of Section P of the Code). At this stage BSCCo, on behalf of the Past Notification Error Committee, are investigating the Past Notification Error claims (as required by paragraph 6.4.4 (b) (i) of Section P of the Code).

In doing this, it may be necessary for further 'information as BSCCo may reasonably request' to be requested from Parties or Party Agents. Therefore Parties and Party Agents will need to be compliant with paragraph 6.4.4 (b) (i) of Section P of the Code until such time as a Past Notification Error claim is determined, corrected and the appeal process, if initiated has been completed. It should be noted that this might require Parties and Party Agents to retain data online for longer than the 28 month minimum proposed under P107.

2.6.2 Data to be Retained by BSC Agents

BSC Agents must retain all relevant Settlement data necessary to execute each of these aspects of the Past Notification Error process. In particular:

- ECVAA must retain all data relating to Volume Notifications which are the subject of claims;

- ECVAA must retain all data necessary to validate proposed adjustments to Volume Notifications;

- ECVAA must retain all data necessary to accept and process corrected Volume Notifications;

- SAA must retain all data relevant to the Settlement Days affected by claims;

- SAA must retain all data necessary to accept corrected Volume Notification data and re-run Settlement for the affected Settlement Days;

- SAA must retain all data necessary to calculate the Error Correction Payment (ECP) defined by the Past Notification Error process, and to calculate how this should be redistributed to Parties;

- FAA must retain all data necessary to apply and collect revised Settlement charges resulting from Past Notification Error process rectification and ECP calculations;

- BSC Agents must retain all operational data relating to the periods including claims, including, for instance, help desk call logs, records of reports distributed, and records of any problems encountered; and

- The BMRA may be required to retain any data that was made available to the industry during the claim period.

Any data potentially associated with a Past Notification Error should be retained in a format which is easily retrievable for presentation to BSCCo, on behalf of the TDC.

2.7 Correction of Large Estimated Annual Consumption / Annualised Advances

Resolution of the large EAC/AA issue requires Parties, Party Agents and BSC Agents to retain Settlement data for 28 months after the Settlement Day in the live operational environment. Therefore minimum data retention requirements proposed under P107 are sufficient to address the EAC/AA issue.

2.8 Refined P107 Requirements

This section defines amendments that will be required to the Code, BSC Systems, Code Subsidiary Documents and other configurable items that are maintained by BSCCo.

2.8.1 Amendments to the Code

These are being developed by the BSCCo legal department.

It should be noted that the Authority approved Modification Proposal P63 'Change Of Contract Management of MPAN's For Data Collector, Data Aggregator And Meter Operator' (Reference 6) on 20 January 2003 with a 20 Working Day Implementation Date. Therefore the legal text for P107 will require paragraph 2.7.9 of Section S of the Code to be amended. The P63 legal text is:

"2.7.9 Each Supplier shall at all times hold the following data in relation to each SVA Metering System for which it is responsible:

(a) the Meter Technical Details;

(b) in the case of a Non Half Hourly Metering System, the Metered Data obtained for each relevant Settlement Register on each occasion during the preceding 48 months on which valid Metered Data was obtained, and the latest values of Estimated Annual Consumption and Annualised Advance."

2.8.2 Amendments to the BSC Systems

It is not envisaged that changes will be required to BSC Systems. This will be confirmed during the DLIA.

2.8.3 Amendments to Code Subsidiary Documents

Amendments will be required to a number of Code Subsidiary Documents, these being:

Code Subsidiary Document	Proposed Amendment
BSCP01 'Overview of Trading Arrangements'	1. Section 1 to specify that Post-Final Settlement Runs and Extra Settlement Determinations exist. 2. Section 1 to specify that data retention obligations exist.

Code Subsidiary Document	Proposed Amendment
BSCP11 'Volume Allocation and Settlement Run Queries'	1. Amend the timescale by when a Trading Query and / or Trading Dispute can be raised (these are two distinct entities) up to 20 months after the Settlement Day. 2. Clarify that Trading Queries / Trading Disputes will only be considered if all Settlement Days within the claim are within the 20 month period. 3. Amend the timescale by when a Post-Final Settlement Run will be completed, which is up to 28 months after the Settlement Day. 4. Identify that Extra Settlement Determinations will be completed, either within the existing Settlement Run timetable, prior to the Post-Final Settlement Run and / or after the Post-Final Settlement Run.
BSCP508 'Supplier Volume Allocation Agent'	3.4 'Annual Profile Data': The timescale currently allows for annual profile data to be requested from SVAA 'At any time'. Following implementation of P107, this data will only be available up to 40 months after the Settlement Day. The timescale references in this process will need modification to restrict a Party's ability to indefinitely request this data.
PSL110 'SVA Meter Operation'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL120 'Non-Half Hourly Data Collection'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL130 'Half Hourly Data Collection'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL140 'Non-Half Hourly Data Aggregation'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.

Code Subsidiary Document	Proposed Amendment
PSL150 'Half Hourly Data Aggregation	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL160 'Supplier Meter Registration Agent'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL170 'Meter Administration'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
PSL180 'CVA Meter Operation'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
SSL320 'Disaster Recovery Service'	Cross-refer to SSL370 for the data retention obligations
SSL330 'National Support Services'	Cross-refer to SSL370 for the data retention obligations
SSL370 'Miscellaneous Services'	Clarification of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the operational environment or archive mechanism (as preferred) will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
BMRA Service Description	Embody the current BSC obligations (paragraph 2.2.4 of Section V) into the Service Description. Note: P107 does not seek to revise the BSC obligations.
CRA Service Description	Inclusion of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.

Code Subsidiary Document	Proposed Amendment
FAA Service Description	Inclusion of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism. 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements
CDCA Service Description	Inclusion of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism.
ECVAA Service Description	Inclusion of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism. 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements
SAA Service Description	Inclusion of: 1. the data retention mechanism ie. within the operational environment for 28 months and thereafter the archive mechanism will be used for a further 12 months. 2. the type of data to be retained is that which was used in the live operational environment and if archiving was used, the Settlement data that was copied to the archiving mechanism. 3. ensure that the Past Notification Error process data retention requirements are not compromised by the P107 data retention requirements

2.8.4 Amendments to Other Configurable Items

Amendments will be required to a number of other configurable items, these being:

Configurable Item	Proposed Amendment
BMRA User Requirement Specification	Consistency changes with Service Description changes
CDCA User Requirement Specification	Consistency changes with Service Description changes
EAC/AA User Requirement Specification	Consistency changes with Service Description changes
FAA User Requirement Specification	Consistency changes with Service Description changes

Configurable Item	Proposed Amendment
NHHDA User Requirement Specification	Consistency changes with Service Description changes
SVAA User Requirement Specification	Consistency changes with Service Description changes

2.8.5 Impacts on BSCCo

BSCCo is already involved in the Trading Disputes process and also retains certain data received from a number of BSC Agents. These responsibilities will continue to apply should P107 be implemented. In particular BSCCo will retain the results of:

- Certification including the Self-Assessment Certification Returns (SACR)[2] and any other documentation that are provided by the Certification Agent;

- Technical Assurance Visits;

- Entry Processes; and

- Teleswitch Agent, BSC Audit and Profile Administrator recommendations.

In addition, BSCCo will continue to support the resolution of the large EAC / AA corrections process and the which will continue for the foreseeable future as well as the Past Notification Error process.

To support the implementation of P107 BSCCo will be required to:

- Support the revised Trading Dispute time-scale and process.
- As necessary notify industry on behalf of the TDC of any Trading Disputes unlikely to be resolved within 40 months of the Settlement Day to which they relate .

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[2] P99 'Changes to Accreditation and the PARMS Serials and Standards, resulting from the Performance Assurance Framework (PAF) Review (Phase 1)' proposes replacing the SACR with a Certification Check List. P99 was recommended by the Panel for approval 15 January 2003.

2.9 Potential Changes to Systems (Party, Party Agent and BSC Agent Systems)

There may be an impact on Party systems and processes as a result of the requirements outlined in section 2.4.

There may be an impact on Party Agent systems and processes as a result of the requirements outlined in section 2.4 and 2.5.

There may be an impact on BSC Agent documents as a result of the requirements outlined in section 2.4.

DLIA undertaken by Parties, Party Agents and the BSC Agents will confirm what impact, if any, including any lead timescales that would be required to develop and implement the necessary system changes (including appropriate archiving mechanisms) for P107. The DLIA responses will be considered by the GSMG prior to determining an appropriate Implementation Date for recommendation to the Panel.

The GSMG intend that requirements of P107 align the Code with industry practice, where possible, in order to minimise impact on industry. This will be confirmed via the DLIA.

2.10 Potential Changes to Core Industry Documentation

The following lists the documentation (other than the documentation specific to the Code) that requires amendment as a result of the implementation of P107 together with a brief summary of the potential change. The documentation listed is believed to represent the full set of impacted documents at this time.

Core Industry Document	Proposed Amendment

Master Registration Agreement	The MRA has two paragraphs which are affected by P107, these being: 30.1 which states that "Each Service Provider shall ensure that it securely maintains a historical record of all data items that have been held in respect of a Metering Point on its MPAS Registration System and that such records are fully auditable, so that a full historical record is maintained for a period of no less than 28 months following initial settlement date in relation to any particular data item, the most recent 24 months being held on-line." This paragraph would need changing to ensure consistency with the P107 requirements. 34.11 which states that "Where a party ceases to be a party pursuant to the terms of Clause 34.8 or Clause 34.10, Clauses 32, 33, 34, 35, 36 and 38 to 46 (inclusive) shall remain in full force and effect as regards that party." This paragraph would need changing to include a hook into paragraph 30.1.

The GSMG will determine the appropriate time for raising an MRA Change Proposal and will build appropriate lead time into the proposed Implementation Date.

2.11 Exclusions

The following section outlines those areas that are not considered to be within the scope of P107:

- Any statutory obligations relating to data retention that may apply to Parties, Party Agents and BSC Agents.

- Any process changes that may be required by Parties and Party Agents.

- Any system changes that may be required by Parties and Party Agents (excluding the EAC/AA and the NHHDA software).

- There is no proposal to specify data retention obligations on the Entry Process Co-ordinator (EPC)[3] on the basis that that the EPC role is an ad-hoc service (which is triggered for example when a Party Agent joins the BSC arrangements or changes role type) and because BSCCo manages and receives the results of the Entry Process, it is not necessary that specific data retention obligations are placed upon the EPC.

- P78 (Reference 7), to be implemented on the 25 February 2003 introduces the concept of Market Data Index Providers, who are not BSC Agents. These agents will be appointed by BSCCo by contractual means. These agents will be required, amongst other things, to retain data. As contractual arrangements are nearly in place, it is not proposed to amend the data retention obligations of these agents any further at this stage. Revisions to the agent contracts may need to occur following approval of P107 and would be achieved using the contract change control process, initiated by BSCCo. This activity is outside the scope of this Requirements Specification. In addition, the Market Data Index Providers may be involved in the Trading Query / Trading Dispute process should the calculations not be performed as required in the contract. No further obligations are required on the Market Data Index Providers at this time.

- On the basis of the timetable recommended for P107, the progress of P107 through the Modification Procedure and on to the Authority will not be completed until April 2003 at the earliest. In order to avoid non-compliance with the Code, Parties will need to negotiate an extension to the

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[3] The EPC is not a BSC Agent and is appointed by BSCCo by contractual means.

data retention requirements with their Agents prior to 27 July 2003 (i.e. twenty-eight months after NETA Go-Live date) pending an Authority Determination on P107.

- On the basis that the P107 Modification Report will not be presented to the Authority until April 2003 at the earliest, BSCCo will negotiate any additional data retention requirements with the affected BSC Agents, pending a determination on P107. This activity is outside the scope of this Requirements Specification.

- Any additional data retention obligations placed on BSC Agents by BSCCo are outside the scope of P107.

3 DEVELOPMENT PROCESS

For the purposes of this assessment, BSC Agents (ie. Logica Consortium, EPFAL Limited and Cap, Gemini, Ernst & Young) should assume that the changes would be implemented as a standalone development project managed by BSCCo.

Notwithstanding, BSCCo recognise that responsibility for design, testing and implementation of the BSC Systems lies with the BSC Agents, and in order to gain assurance that changes made are consistent with the requirements, BSCCo requires visibility of these processes. The following sections give an indication of the control points required during design, testing and implementation and are supplied to provide a basis on which the BSC Agent can estimate.

3.1 Design

BSCCo intend that responsibility for the correctness of the design should remain with the BSC Agents, but that BSCCo should have the opportunity to review it, and identify apparent inconsistencies with the requirements. The following processes are proposed to achieve this:

BSCCo will review changes to the User Requirement Specifications (URS), and sign-off the document once review comments have been addressed.

BSCCo will review changes to the System Specification and Design Specification, and identify any evident inconsistencies with the URS, but will not sign-off the documents.

3.2 Testing

BSCCo intend that responsibility for software testing should remain with the BSC Agents, but that BSCCo should have some visibility of the process, in order to gain assurance that the integrity of Trading and Settlement is maintained. The following processes are proposed to achieve this:

As part of the response to this document, the BSC Agents will provide a statement of their proposed testing strategy. This statement will be reviewed by BSCCo, and should explain how the BSC Agents will demonstrate that the changes are ready for live operation, and that there is no unplanned impact on pre-existing facilities.

BSCCo will be provided for information with test plans, test scripts and other test documentation that they may request. BSCCo will review these documents, and identify any evident inconsistencies with the agreed testing strategy, but will not authorise them.

BSCCo will have the option of witnessing appropriate elements of the BSC Agent's testing.

The BSC Agent will provide BSCCo with a test report, summarising the testing carried out, and the results of those tests. The report will also describe any defects found during testing, and the steps taken to resolve them.

3.3 Implementation

BSCCo anticipate the following interaction with the BSC Agent's implementation process:

As part of the impact assessment of this document, the BSC Agents will provide a high-level statement of their proposed implementation approach (describing, for example, whether a phased approach is proposed). BSCCo will review and sign-off this high-level implementation strategy.

Implementation date(s) for the changes described in this document will be agreed in advance by BSCCo and the Agents.

4 SUMMARY OF REQUIREMENTS

The table below summarises the GSMG requirements for P107 specified in this document.

No	Requirement	Responsibility
1	Trading Query can be raised up to 20 months after the Settlement Day.	Parties
2	Where a Trading Query is raised covering a number of Settlement Days, all Settlement Days in the disputed period will satisfy the 20 month cut-off period.	Parties
3	TDC may accept late Trading Queries under exceptional circumstances.	TDC/ Panel
4	TDC shall accept late Trading Queries, relating to Settlement Days between 20 and 36 months, for three months after implementation of P107.	TDC/ Panel
5	Post Final Settlement Runs supported up to 28 months after the Settlement Day to which they relate.	All
6	Disputes resolved beyond 28 months via an Extra Settlement Determination.	All
7	BSCCo on behalf of the TDC to notify the industry of those Trading Disputes which are unlikely to be resolved within 40 months of the Settlement Day to which they relate.	BSCCo/ TDC
8	A total of 40 months of Settlement data retained for each Settlement Day by each BSC Party and Party Agent.	Parties/ Party Agents
9	In the circumstance where a BSC Party has had its acceded status for less that 40 months, the BSC Party will retain the data from their accession date.	Parties
10	In the circumstance where a Party Agent has been appointed for less than 40 months, the Party Agent will retain the data from their appointment date.	Party Agents
11	Each BSC Party and Party Agent will be required to retain 28 months of Settlement data in the live operational environment.	Parties/ Party Agents
12	Each BSC Party and Party Agent will be required to retain a further 12 months of Settlement data either using the live operational environment or a data archiving mechanism.	Parties/ Party Agents

No	Requirement	Responsibility
13	Where Parties or Party Agents utilise an archiving mechanism is rather than the live operational environment, the archiving mechanism used should maintain a copy of data, which will support the resolution of a Trading Dispute via an Extra Settlement determination.	Parties/ Party Agents
14	Each Data Collector (both Half Hourly and Non-Half Hourly Data Collectors) will be required to transfer all (both valid and invalid) Metered Data obtained for each relevant Settlement Register on each occasion during the preceding 28 months to the new Data Collector.	DCs
15	Non-Half Hourly Data Collectors to additonally transfer the latest values of Estimated Annual Consumption and Annualised Advance to the new Non-Half Hourly Data Collector.	DCs
16	Meter Operator Agents (both Half Hourly and Non-Half Hourly Meter Operator Agents) required to transfer the most recent historic Meter Technical Details, from the last 28 months, to the new Meter Operator Agent.	MOAs
17	40 months of Settlement data retained by BSC Agents (CDCA, CRA, ECVAA, SVAA, SAA and FAA).	BSC Agents
18	BSC Agents (CDCA, CRA, ECVAA, SVAA, SAA and FAA) to retain at least 28 months of Settlement data in the live operational environment.	BSC Agents
19	BSC Agents (CDCA, CRA, ECVAA, SVAA, SAA and FAA) to retain at least a further 12 months of Settlement data using a data archiving mechanism agreed with BSCCo.	BSC Agents/ BSCCo
20	BSC Agents will support the P6 process.	BSC Agents
21	BSC Agents will support resolution of the EAC/AA issue.	BSC Agents

APPENDIX 1 PROPOSED DISPUTES TIMETABLE

The attached document (P107AS Appendix 1) outlines the disputes timetable proposed under P107.