

**Change Proposal – BSCP40/02**

CP No: 1326  
Version No: v1.0  
(mandatory by BSCCo)

**Title** (mandatory by originator)

Update to BSCP128 from lessons learnt exercise carried out with LDSOs

**Description of Problem/Issue** (mandatory by originator)**Background:**

BSCP128 was introduced on 20 April 2009 as a result of [Modification P216 ‘Audit of LLFs’](#). It replaced the existing processes for the submission and approval of Line Loss Factors (LLFs).

BSCP128 brought in a new audit process for the LLFs submitted by Licensed Distribution System Operators (LDSOs). This audit process is undertaken by ELEXON.

**Defining the problem:**

We have completed the audit process for the first time and, together with the LDSOs, we have identified a number of potential improvements e.g. overlapping processes for the Host and Embedded LDSOs have resulted in unnecessary costs to the Embedded LDSOs and this can be resolved by changing the timing of the submission.

We held a workshop with LDSOs on the 27 January 2010 to review these improvements. Broad agreement was reached at this workshop and we subsequently received agreement from all LDSOs prior to raising CP1326.

The aim is to implement these changes in the **June 2010** release so they can be implemented prior to the next audit process commencing in September 2010.

**Proposed Solution** (mandatory by originator)

The following BSCP’s will be amended in order to implement this change:

**BSCP128 ‘Production, Submission, Audit and Approval of Line Loss Factors’**

- 1.7 Reference to ELEXON Helpdesk changed to BSC Service Desk;
- 1.8.2 Definitions updated to add further clarity;
- References to P216 and year 1 operation have been removed;
- 2.3 Host LDSO LLF Submission/Audit process times have been amended. There are no significant changes in the timing for Host LDSOs. The new process timings set the absolute backstop date to 10 December for re-submissions, it was previously 31 December;
- 2.4 Embedded LDSO LLF Submission/Audit process times have been amended. The major change is to delay the mirrored submission until a compliant set of LLFs are ready. With the current process Embedded LDSOs must submit 1 month after the Host submission when the LLF audits have not been completed. If one LDSO has a non-compliant LLF value all Embedded LDSOs have to re-create and re-submit the LLFs. By delaying the Embedded submission we remove the need for an unnecessary submission.

- 3.1 Methodology principles. The date range for Settlement Data used in the Generic LLF calculation has been fixed as the BSC Year and at R3 or greater. Using the latest BSC Year with R2 data would only allow a month for LDSOs to perform the LLF calculations.

**BSCP128 Appendix 1 ‘Methodology Self Assessment Document (MSAD) for Host LDSOs and Embedded LDSOs that do not Mirror’**

- The double signature requirement has been removed from all appendices. The forms will require a Category X BSC Signatory only.
- 3 questions have been added to the document for principles 14, 15 and 16 to ensure that the principles are included in the LDSO methodology statement.

**BSCP128 Appendix 2 ‘Methodology Self Assessment Document for Embedded LDSOs (MSAD) for Embedded LDSOs that Mirror’**

- The double signature requirement has been removed from all appendices. The forms will require a Category X BSC Signatory only.
- The MSAD for Embedded LDSOs now includes a data request. This is requested with the MSAD as the CSAD submission has been delayed so that it no longer overlaps the Host LDSO audit process. The data request will enable the sampling of Metering Systems to be performed prior to the CSAD submission.

**BSCP128 Appendix 3 ‘Calculation Self Assessment Document (CSAD) for Host LDSOs and Embedded LDSOs that do not Mirror’**

- The double signature requirement has been removed from all appendices. The forms will require a Category X BSC Signatory only.
- The Host LDSO CSAD data request tables have been updated. The submission will now include the LLFs by Seasonal Time of Day (STOD) period to make comparison checks quicker. Some Embedded LDSOs also use this format in the production of their LLF submissions.

**BSCP128 Appendix 4 ‘Line Loss Factor Calculation Self Assessment Document (CSAD) for Embedded LDSOs that Mirror’**

- The double signature requirement has been removed from all appendices. The forms will require a Category X BSC Signatory only.
- A question has been added to confirm if the LLFs have been re-calculated with the last 2 years.
- The Embedded LDSO CSAD data request tables have been updated. The submission will now include the LLFs by STOD period to make comparison checks quicker.

**Justification for Change** *(mandatory by originator)*

The process improvements will make the audit process more efficient for LDSOs and ELEXON.

In particular, this change introduces a more efficient process for those Embedded LDSOs whose Line Loss Factors mirror those of the Host LDSO.

**To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?** *(mandatory by originator)*

**Section K** ‘Classification and Registration of Metering Systems and BM Units’

The changes proposed as part of CP1326 will improve on the current process by ensuring that overlapping processes and identified inefficiencies are removed.

**Estimated Implementation Costs** *(mandatory by BSCCo)*

ELEXON man days/costs: 11days, equivalent to £2,640.

**Configurable Items Affected by Proposed Solution(s)** *(mandatory by originator)*

BSCP128 ‘Production, Submission, Audit and Approval of Line Loss Factors’ v1.0

BSCP128 ‘Appendix 1 Methodology Self Assessment Document (MSAD) for Host LDSOs and Embedded LDSOs that do not Mirror’ v1.0

BSCP128 ‘Appendix 2 Methodology Self Assessment Document for Embedded LDSOs (MSAD) for Embedded LDSOs that Mirror’ v1.0

BSCP128 ‘Appendix 3 Calculation Self Assessment Document (CSAD) for Host LDSOs and Embedded LDSOs that do not Mirror’ v1.0

BSCP128 ‘Appendix 4 Line Loss Factor Calculation Self Assessment Document (CSAD) for Embedded LDSOs that Mirror’ v1.0

**Impact on Core Industry Documents or System Operator-Transmission Owner Code** *(mandatory by originator)*

None

**Related Changes and/or Projects** *(mandatory by BSCCo)*

None

**Requested Implementation Date** *(mandatory by originator)*

June 2010

**Reason:**

The aim is to implement these changes in the **June 2010** release so they can be implemented prior to the next audit process commencing in September 2010.

**Version History** *(mandatory by BSCCo)*

This is version 1.0 of the CP for impact assessment. This CP has not been issued previously as a DCP.

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**Attachments: Y**

**Attachment A:** Proposed redline changes to BSCP 128 – Production, Submission, Audit and Approval of Line Loss Factors (37 Pages)

**Attachment B:** Proposed redline changes to BSCP128 Appendix 1 – Methodology Self Assessment Document (MSAD) for Host LDSOs and Embedded LDSOs that do not Mirror (6 Pages).

**Attachment C:** Proposed redline changes to BSCP128 Appendix 2 – Methodology Self Assessment Document for Embedded LDSOs (MSAD) for Embedded LDSOs that Mirror (9 Pages).

**Attachment D:** Proposed redline changes to BSCP128 Appendix 3 – Calculation Self Assessment Document (CSAD) for Host LDSOs and Embedded LDSOs that do not Mirror (19 Pages).

**Attachment E:** Proposed redline changes to BSCP128 Appendix 4 – Line Loss Factor Calculation Self Assessment Document (CSAD) for Embedded LDSOs that Mirror (20 Pages).