

Change Proposal – BSCP40/02

CP No: 1199

Version No: 1.0
(mandatory by BSCCo)

Title (mandatory by originator)

Changes to BSCP515 'Licensed Distribution' to remove non functional information and add clarity

Description of Problem/Issue (mandatory by originator)

Since the implementation of P62, a number of new Licensed Distribution System Operators (LDSOs) have acceded to the Code, completed Entry Process testing and become operational in the market. LDSOs have to use BSCP515 to carry out some of the activities required of them to become operational in the market. BSCP515 also contains requirements that relate to LDSOs ongoing activities.

LDSO's have provided feedback to ELEXON in respect of BSCP515, in that they have expressed concern about the accuracy, sequencing, complexity and inconsistent terminology within BSCP515.

As a result of the concerns, ELEXON produced a guidance note in April 2006 providing details relating to market entry and the Code requirements to consider when setting up a new LDSO business. The guidance note is available to download from the [ELEXON website](#). ELEXON has sought feedback on this guidance note and LDSO's have stated that it is much more useful than BSCP515 for carrying out activities related to entering the market.

While the guidance note has been useful to LDSOs, BSCP515 is still an operational BSCP and is considered confusing by new LDSOs. This Change Proposal (CP) seeks to add clarity to BSCP515 and remove unnecessary guidance sections of BSCP515 (which generally reference processes in other BSCPs) around entering the market. It also seeks to add clarity to ongoing LDSO obligations in the following way:

- By including relevant information from other BSCPs (and one of the appendices of BSCP515) in the interface and timetable sections of BSCP515 instead of including cross references to other BSCPs (or BSCP515 appendices) where appropriate; and
- Removing high level obligations to carry out processes that are completely contained in other BSCPs (as these obligations are contained in the other BSCPs).

This CP does not seek to change any of the ongoing obligations on LDSOs.

Proposed Solution (mandatory by originator)

This CP recommends that BSCP515 is updated to remove unnecessary sections, which simply reference processes set out in other BSCPs and that the remaining sections are clarified, where necessary.

It is proposed that BSCP515 should be amended as follows:

1. Sections 3.1 and 3.2 (relating to Distribution Business Beginning to Operate and Distribution Business beginning Operations for a New Distribution System) should be removed as all of the processes mentioned in these sections are set out within other BSCPs and guidance provided within the existing guidance note. It is therefore considered that these sections are unnecessary for this BSCP and should be removed;
2. Remove section 3.9 (Operational Requirements) which summarises ongoing obligations on LDSOs, mostly by referring to processes in other BSCPs (this section is included in full in the existing guidance note). The two obligations relating to performing emergency de-energisations and liaising with other LDSOs to help establish the correct LLFs and Aggregation Rules, are not included in other BSCPs and should be moved to sections 3.6 and 1 respectively;
3. Update the other parts of section 3 to clarify text and processes, reducing the number of references to other BSCPs where sensible;
In particular:
 - section 3.3 and 3.7 should be updated to include additional text from BSCP501 to describe the processes more fully;
 - section 3.4 and 3.8 should be updated to include additional text from BSCP75 to describe the processes in more detail; and
 - sections 3.5 and 3.6 should be updated to include information on prepayment meters which is

currently included in BSCP515 appendix 4.5. In addition 3.6 should be updated to include reference to de-energising meters in emergency situations (this information is currently included in section 3.9).

4. Remove almost all of Appendix 4, as most of the information included is for guidance purposes rather than providing additional obligations and is already included in the existing guidance note; and
5. Update section 1 (Introduction) to reflect the changes described above.

These changes are set out in detail in the attached redlined text.

This CP has been raised from DCP0006 'Changes to BSCP515 'Licensed Distribution' to remove non functional information and add clarity'. Where appropriate comments received on the redlined text for DCP0006 have been incorporated into the redlined text for this CP. A number of comments from DCP0006 have not been incorporated into the redlining for this CP as these comments suggested changes that may have an operational impact on LDSOs. Since this CP does not seek to change any of the ongoing obligations on LDSOs, the comments are out of scope of this CP, however could be raised as a separate CP if any Party believes that further changes are required.

One respondent noted that the redlined text contained references to Section 2 'Workflow Diagrams', which are to be removed following the conclusion of the Code Subsidiary Document review. The workflow diagrams will be removed under CP1176 in the November 2007 release, however the redlined text is based on the current version of the BSCP. Therefore references to Section 2 remain for the purposes of this redlining.

The DCP responses and an explanation as to why comments have been incorporated or not can be found at the following location of the ELEXON website:

http://www.elexon.co.uk/changeimplementation/changeprocess/draft_change_proposals/default.aspx,
under DCP0006.

Justification for Change *(mandatory by originator)*

Adding clarity and removing unnecessary information from BSCP515 will make it easier for LDSOs to understand their obligations. These changes will be particularly beneficial to new LDSOs entering the market.

This CP arises from a review of BSCP515 that was requested by Supplier Volume Allocation group (SVG) and with the co-operation of an SVG LDSO sponsor.

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 A4 'Party Registration'
Section K2 'Registration of Metering Systems'

This CP does facilitate the current provisions of the Code, for the reasons outlined in the Justification for the Change.

Estimated Implementation Costs *(mandatory by BSCCo)*

3 ELEXON Man Days (£660)

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

BSCP515 'Licenced Distribution'

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

None

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

CP1184 'Disconnection of Energised Metering Systems'. CP1184 has been approved for inclusion in the November 2007 release. The changes for this CP are therefore drafted against a version of BSCP515 that includes the approved text for CP1184 (the CP1184 approved text is not redlined but it is highlighted).

Requested Implementation Date (*mandatory by originator*)

February 2008 Release

Reason:

This change should be implemented in the next appropriate release.

Version History (*mandatory by BSCCo*)

This is version 1.0 for Impact Assessment.

This change was previously raised as DCP0006 'Changes to BSCP515 'Licensed Distribution' to remove non functional information and add clarity'. DCP0006 was issued for impact assessment as part of CPC00603. Further details about DCP0006 can be found at the following location of the ELEXON Website: http://www.elexon.co.uk/changeimplementation/changeprocess/draft_change_proposals/default.aspx.

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Attachments: Y (If Yes, No. of Pages attached: 25)
CP1199 Attachment A BSCP515 v4.0 redlined v0.3