

Redlined BSCP537 Appendix 1: Self Assessment Document (SAD) changes for CP1368 'Changes to Clarify/Resolve Operational Issues Related to Unmetered Supplies in SMRS'

The CP proposes changes to BSCP537 Appendix 1 sections: 16.1.6; 16.2.1 and 17.1.4.

We have redlined these changes against version 11.0 of the BSCP.

SECTION 16 – METER ADMINISTRATOR

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your Agency Service to ensure the requirements of the BSC, BSCP520 and PSL100 are met. Whilst Sections 1 to 7 of the SAD are generic to all Agency Services, this section focuses on the specific controls required to operate effectively as a Meter Administrator.

Guidance for completing this section

The Meter Administrator (MA) is responsible for receiving summary inventory and latitude/longitude information from the Unmetered Supplies Operator (UMSO) and where relevant inputting this information into the Equivalent Meter (EM). Where the EM is Central Management Systems (CMS) Capable the MA is responsible for inputting the CMS Control File and receiving Event Log data from the CMS. In addition the MA is responsible for operating and maintaining the EM hardware and software, ensuring that metered data is available from the EM in time for the Data Collector to meet the Settlement timetable and indicating to the Data Collector where estimated data should be used where an EM is not functioning correctly. The section is split as follows:

Business Processes and Mitigating Controls: This section looks at the controls over the input of summary inventory and latitude/longitude data into the EM and the operation and maintenance of the metering equipment. It also considers the maintenance of standing data which, if incorrect, may impact upon Settlement, the provision for a full audit trail history of the data used by your Agency Service and any changes made to it as outlined in BSCP520 and PSL100.

Exception Management: The section looks at the specific controls you have in place to report on, monitor and resolve exceptions during the processing of your data.

A number of questions in the SAD relate to ‘data quality’. In this section of the SAD you are concerned with the on-going quality of your data when your Agency Service is live and in operation. The quality of the data used to initially populate your Agency Service is considered in Section 7 of the SAD. A number of the questions in the service specific sections of the SAD relate to how you will ensure the accuracy of incoming and outgoing data and in the event that poor quality data does enter your Agency Service, how you identify and resolve this to minimise the impact upon other Parties and Party Agents. There are numerous methods of monitoring the quality of your data and the benchmarks that you use should be tailored to your Agency Service and the specific risks posed to your data quality.

Both system and manual controls should be considered when answering the SAD questions as your Agency Service will rely on both system and manual processes to effectively fulfil its obligations. Responses should consider the procedures in place for dealing with electronic flows received via the DTN and also manual data flows received via any other means e.g. email, fax, letter.

16.1 Business processes and mitigating controls

Question	Guidance	Response	Evidence
<p>16.1.1 What controls do you have in place to ensure that the establishment of new UMS Inventory is done in accordance with the requirements of BSCP520?</p>	<p>The MA receives a number of key inputs from the UMISO and the Supplier:</p> <ol style="list-style-type: none"> (1) Latitude and longitude information for each MSID is received on a P0068 and summary inventory details are received on a P0064 (BSCP520 3.1 to 3.7) and/or CMS Control file as appropriate. (2) Appointment and termination details are received from the Supplier on D0155, D0148 and D0151 flows via an electronically or other agreed method. <p>The response should address the following areas:</p> <ol style="list-style-type: none"> (a) Summary inventory is validated against the Operational Information Document (OID). In what form will an audit trail be provided from the relevant inventory, and is the data in the is in the correct format? (b) The EM type adopted utilises software which has been approved by BSCCo to provide settlement metered data in accordance with BSC Requirements. (c) Controls to ensure around the population of data into the EM system is carried out completely, accurately and in a timely manner. (d) Procedures are in place to ensure that EM system parameters have been correctly configured and assigned in a timely manner. 		

Question	Guidance	Response	Evidence
	<ul style="list-style-type: none"> (e) Monitoring procedures are in place to identify changes required to data in a timely manner and to ensure the EM is updated accordingly. (f) All flows are identified, reviewed and authorised prior to processing. (g) The validation of data for formats and lengths, e.g. the MSID is valid. (h) Evidence is retained as to who processed the data, when and what was updated to the MA database. 		
<p>16.1.2 How do you ensure that once a UMS connection has been established changes to inventories are processed completely and accurately in accordance with the requirements of BSCP520?</p>	<p>The response should include the following key events:</p> <ul style="list-style-type: none"> (a) Receiving and processing of revised UMS inventories and/or CMS Control files as appropriate. (b) Controls in place to identify required changes to data. (c) Controls in place that changes are performed in a timely manner and the EM is updated accordingly. (d) Controls in place to ensure that applications for revised inventories continue to meet the criteria specified in BSCP520. 		
<p>16.1.3 How do you ensure that information and data flows relating to UMS are sent or received and processed completely,</p>	<p>The response should include the following key events:</p> <ul style="list-style-type: none"> (1) Provision of UMS summary inventories via the P0064 data flow and/or CMS Control file as appropriate 		

Question	Guidance	Response	Evidence
<p>accurately and in a timely manner in accordance with BSCP520?</p>	<p>(2) Provision of Equivalent Meter Technical Details via the P0068 data flow</p> <p>(3) Receipt and processing of appointment details via data flows</p> <p>(4) Sending of P0173 and P0174 to Data Collectors</p> <p>(5) Receipt and processing of CMS Event Log file</p> <p>The response should address the following:</p> <p>(1) All flows are identified, reviewed and authorised prior to processing.</p> <p>(2) The validation of data flows for format and lengths</p> <p>(3) The validation of data for completeness and accuracy (e.g. the MSIDs is valid).</p> <p>(a) Where the generating/sending of flows requires the use of MDD the response should reference how it is ensured that data in the flow is validated against the latest version of MDD.</p> <p>(b) Where an agreed method other than the standard DTC flow is to be used the response should address:</p> <ul style="list-style-type: none"> • How you manage the approval / agreement of receipt/sending of data in another agreed format; • What records are retained of the agreement of the method as well as the actual data received/sent; and • How do you ensure that timescales 		

Question	Guidance	Response	Evidence
	<p>surrounding this data are adhered to.</p> <ul style="list-style-type: none"> • Controls in place to ensure that all data required or expected is received and that all data to be sent is sent in a timely manner. This may be through controls within the routine or through manual controls. 		
<p>16.1.4 What controls do you have in place to ensure that the requirements of BSCP520 are met when a Change of Supplier (CoS) and/or Change of Agent (CoA) event takes places?</p>	<p>The response should cover how you identify when a CoS/CoA activity has taken place and should address the following:</p> <p>For HH UMS CoS:</p> <p>(a) Receipt and processing of appointment flows; and</p> <p>(b) Receipt and processing of P0068 EM Technical Details (latitude and longitude information) and P0064 Summary Inventory.</p> <p>Change of MA:</p> <p>(a) Receipt and processing of appointment flow and/or termination flow; and</p> <p>(b) Sending and processing of requests for transfer of information between old and new MA</p> <p>Change of Data Collector:</p> <p>(a) Receipt and processing of notification of Change of Agent flows (D0148); and</p> <p>(b) Sending of P0173 and P0174 and all information transferred.</p>		

Question	Guidance	Response	Evidence
<p>16.1.5 What controls do you have in place to ensure that the requirements of BSCP520 are met for EM Fault Reporting?</p>	<p>The response should address the following areas:</p> <ol style="list-style-type: none"> (1) Monitor and manage the receipt of notification of a fault/inconsistency; (2) Action required to investigate the fault/inconsistency reported; (3) Identify the period of the fault and notify relevant participants; and (4) Rectify data and send Data Collector corrected data. <p>The response should address the following areas:</p> <ol style="list-style-type: none"> (a) Procedures in place to ensure that timescales and requirements are in accordance with BSCP520 <p>Controls in place to monitor progress of EM Fault Reporting</p>		
<p>16.1.6 Where Dynamic Equivalent Metering Systems are used, what procedures are in place to ensure that Photo Electric Cell Unit (PECU) Arrays are installed, configured and maintained correctly?</p>	<p>The response should address the following areas:</p> <ol style="list-style-type: none"> (1) <u>Procedures are in place to ensure that the process in siting the PECU array is in accordance with BSCP520.</u> (+2) Documented procedures are in place over the set up, installation and testing of the PECU Array(s) and associated communications equipment. These procedures should encompass tests to confirm that information can be retrieved from the PECU Array(s) to meet operational requirements and settlement run timescales. (23) Procedures are in place to establish the load weighted numbers of Unmetered Apparatus controlled by PECUs to ascertain the correct 		

Question	Guidance	Response	Evidence
	<p>proportion of PECUs on a PECU Array. These procedures also ensure that for each PECU in an Array, type and location details are maintained within the Equivalent Meter system.</p> <p>(34) Procedures are in place to monitor and maintain the correct operation of the PECU Array(s). These procedures encompass the review of any spurious or unusual performance of PECUs within the Array. Failed cells within an Array are replaced in a timely manner.</p> <p>(45) Procedures are in place covering the use of appropriate default PECU regimes and/or switching regimes in the event that PECU Array data is not available for any day.</p>		
16.1.7 How have you ensured that you have appropriate audit trails in place?	<p>Your systems should be capable of reporting (or archived information should be stored so that it is available for enquiry) sufficient information so as to enable a user to obtain, in a timely fashion any changes to standing data held or used by the system.</p> <p>The audit trail and archiving requirements for MA are set out in PSL100 sections 10.2 and 10.3</p>		
16.1.8 How have you ensured that you can meet the data retention requirements set out in BSC Section U1.6 and PSL100 sections 10.2 and 10.3?	<p>Section U1.6 sets out the requirements on Parties and their Party Agents to retain Settlement Data for:</p> <ol style="list-style-type: none"> (1) 28 months after the Settlement Day to which it relates on-line; (2) Until the date 40 months after the Settlement Day to which it relates in an archive; and (3) At the request of the Panel, for more than 40 months if needed for an Extra Settlement 		

Question	Guidance	Response	Evidence
	<p>Determination.</p> <p>The response should address the following:</p> <ul style="list-style-type: none"> (a) Controls to ensure that any archived data can be retrieved within 10 Business Days. (b) Systems and procedures to ensure that all data that is retained is in a form in which the data can be used in carrying out a Settlement Run or Volume Allocation Run. 		

16.2 Exception Management

Question	Guidance	Response	Evidence
<p>16.2.1 What procedures are in place for identifying, monitoring and resolving unprocessed data flows or notifications, exceptions arising in processing and errors in order to ensure that service level requirements are met?</p>	<p>Within the requirements of the Service there are a number of points at which delays in processing data could occur which if not addressed could exceed the timescale requirements as set out in BSC520 or PSL100.</p> <p>The response should cover the following areas:</p> <ul style="list-style-type: none"> (1) An analysis of data processing by your Agency Service has been performed in order to identify all points of rejection/failure or potential backlogs in dataflow processing. (2) Reporting mechanisms are in place in order to monitor levels of rejections/failures and backlogs on a daily basis. (3). In the event that an EM fault, including incorrect or missing data, is identified, documented resolution procedures detail actions 		

Question	Guidance	Response	Evidence
	<p>to be followed to rectify the fault. The procedures include the timely notification of the nature of the fault to all relevant parties. Following resolution the period covered by the fault and the date and time of rectification should also be notified.</p> <p><u>(4) Recalculation of unmetered supplies data (as more accurate data becomes available) for each MSID for each settlement Day.</u></p>		

16.3 Additional Information

Question	Guidance	Response	
16.3.1 What additional detail would you like to add to your response?	<p>The Applicant can use the space provided to add any additional clarification and/or evidence that they consider necessary.</p> <p>This question is optional.</p>		

SECTION 17 - UMSO

Objectives of this section

The objective of this section is to consider the controls that have been built into the systems and processes supporting your Unmetered Supplies Operator (UMSO) service to ensure the operational requirements of the BSC and BSCPs are met. Whilst Sections 1 to 7 of the SAD are generic to all Qualified Persons, this section focuses on the specific controls required to operate effectively as an UMSO.

Guidance for completing this section

The UMSO is responsible for establishing new Unmetered Supplies and establishing appropriate Connection Agreements with UMS customers in line with the requirements set out in BSCP520. In addition it is responsible for providing summary inventories to the Meter Administrator (Half Hourly) and issuing Unmetered Supplier Certificates (Non Half Hourly).

Business Processes and Mitigating Controls: This set of questions looks at the controls over the provision of data to other participants, the subsequent processing of information received and the transmission of this updated data to relevant participants.

Exception Management: The section looks at the specific controls you have in place to report on, monitor and resolve exceptions during the processing of your data.

A number of questions in the SAD relate to 'data quality'. This section of the SAD is concerned with the on-going quality of your data when your UMSO service is live and in operation. The quality of the data used to initially populate your service is considered in Section 7 of the SAD. A number of the questions in the service specific sections of the SAD relate to how you will ensure the accuracy of incoming and outgoing data and in the event that poor quality data does enter your UMSO service, how you identify and resolve this to minimise the impact upon other Parties and Party Agents.

Both system and manual controls should be considered when answering the SAD questions as your service will rely on both system and manual processes to effectively fulfil its obligations. Responses should consider the procedures in place for dealing with electronic flows received via the DTN and also manual data flows received via any other means (e.g. email, fax letter). It is recognised that not all UMSOs use the DTN to send and receive information from other participants. Where a question references a specific data flow this should be interpreted to mean the information that would normally be sent/received using that data flow even if the DTN is not used as the method of receipt/delivery. A full response should be provided and the Applicant should indicate for each data flow referenced whether the DTN or an alternative method of communication would be used.

17.1 Business processes and mitigating controls

Question	Guidance	Response	Evidence
<p>17.1.1 What controls do you have in place to ensure that the establishment of new UMS connections is done in accordance with the requirements of BSCP520?</p>	<p>The UMSO is required to carry out a number of activities when establishing or updating UMS inventories. The response should include the following key events:</p> <ul style="list-style-type: none"> (1) Receiving/processing applications for new UMS from customers (2) Establishing UMS Connection Agreements with customers (3) Distinguishing between HH and NHH UMS and applying distinct processes <p>The response should address the following areas:</p> <ul style="list-style-type: none"> (a) Controls in place to ensure that applications for new Unmetered Supplies meet the UMS criteria specified in BSCP520. (b) Procedures for establishing appropriate UMS Connection Agreements with all customers ensuring that the key clauses defined in BSCP520 (section 1.1) are adhered to as a minimum. <p>Monitoring controls to ensure that all new connections are set up completely and accurately and have a formal connection agreement in place.</p>		
<p>17.1.2 How do you ensure that once a UMS connection has been established new inventories or changes to inventories are processed completely and accurately in accordance</p>	<p>The response should include the following key events:</p> <ul style="list-style-type: none"> (1) Receiving and processing new/revised UMS inventories from customers and Change of Measurement Class applications from Suppliers. (2) Calculation of EACs for Non Half Hourly UMS 		

Question	Guidance	Response	Evidence
with the requirements of BSCP520?	<p>(3) Generation of UMS Certificates and data flows (D0052)</p> <p>(4) Generation of summary inventories for Half Hourly UMS</p> <p>The response should address the following areas:</p> <p>(a) Controls and procedures in place to ensure the correct application of initial/revised EAC calculations for each Settlement register is recorded for each MSID for NHH traded UMS (BSCP520 Appendix 4.4).</p> <p>(b) Procedures for generating the required outputs for NHH traded UMS (UMS Certificate and D0052)</p> <p>(c) Procedures for monitoring the required outputs for HH traded UMS (Summary Inventory)</p> <p>(d) Monitoring of compliance against conditions of UMS Certificates)</p> <p>(e) Controls in place to ensure that applications for revised UMS inventories continue to meet the UMS criteria specified in BSCP520.</p> <p>(f) Existence of a trigger upon receipt of updated inventories/Change of Measurement Class/Change of Supplier notifications to re-start the procedures for establishing a new UMS inventory to ensure that the criteria for UMS detailed in BSCP520 continue to be met.</p>		
17.1.3 How do you ensure that information and data flows relating to Half Hourly Unmetered	<p>The response should include the following key events:</p> <p>(1) The sending of request to SMRA for a new MSID record via P0171 data flow</p>		

Question	Guidance	Response	Evidence
<p>Supplies are sent or received and processed completely, accurately and in a timely manner, in line with the requirements of the BSC?</p>	<p>(2) Sending of UMS Certificates to customer and Supplier on a P0170 flow</p> <p>(3) Provision of Equivalent Meter Technical Details via P0068 data flow</p> <p>(4) Receipt and processing of appointment details.</p> <p>(5) Provision of UMS summary inventories to the appointed Meter Administrator via P0064 data flow</p> <p>(6) Receiving requests for Equivalent Meter Technical Details and location of PECU arrays (if applicable) via a P0176 data flow</p> <p>The response should address the following</p> <p>(1) All flows are identified, reviewed and authorised prior to processing.</p> <p>(2) The validation of data flows for formats and lengths</p> <p>(3). The validation of data for its internal consistency, for completeness and accuracy (e.g. the MSID is valid).</p> <p>(a) Where the generating/sending of flows requires the use of MDD the response should reference how it is ensured that this data is valid.</p> <p>(b) Where an agreed method other than the standard DTC flow is to be used the response should address:</p> <ul style="list-style-type: none"> • How you manage the approval / agreement of receipt / sending of data in another agreed format, 		

Question	Guidance	Response	Evidence
	<ul style="list-style-type: none"> • What records are retained of the agreement of the method as well as the actual data received / sent; and • How you ensure that timescales surrounding this data are adhered to. <p>(4) Controls in place to ensure that all data required or expected is received and that all data to be sent is sent in a timely manner. This may be through controls within the update routines or through manual controls.</p> <p>(5) Existence of agreed procedures with the appointed Meter Administrator for the checking and agreement of inventories.</p>		
<p>17.1.4 How do you ensure that information and data flows relating to Non Half Hourly Unmetered Supplies are sent or received and processed completely, accurately and in a timely manner, in line with the requirements of the BSC?</p>	<p>The response should address the following key events:</p> <p>(1) The sending of a request to SMRA for a new MSID record for UMS via P0171 data flow</p> <p>(2) Accurate calculation of EACs according to calculation type (BSCP520 Appendix 4.4) <u>and adjustment of EACs following an LDSO inventory audit.</u></p> <p>(3) Sending of UMS Certificates to customer and Supplier via a P0170 data flow</p> <p>(4) Receipt and processing of appointment details.</p> <p>(5) Sending of split EAC/Profile Class and SSC details via a D0052 data flow to the Supplier and NHHDC following a new connection/change of inventory detail.</p> <p>(6) The creation and sending of an annual</p>		

Question	Guidance	Response	Evidence
	<p>spreadsheet of all UMS EACs to Suppliers on a P0218 data flow as specified in BSCP520. The response should include:</p> <ul style="list-style-type: none"> (i) A description of the process by which Supplier UMS registrations are collated; (ii) Processes in place for applying the appropriate Average Fraction of Yearly Consumption (AFYC). (iii) Submission of the data to Supplier/BSCCo (iv) How you ensure that all requests received via a D0310 from the Supplier (or NHHDC) to resend correct EACs to the NHHDC are actioned. <p>The response should address the following</p> <ul style="list-style-type: none"> (a) All flows are identified, reviewed and authorised prior to processing. (b) The validation of data for formats and lengths, e.g. the MSID is valid. (c) The validation of data for its internal consistency, for completeness and accuracy. <ul style="list-style-type: none"> (i) Where the generating/sending of flows requires the use of MDD the response should reference how it is ensured that this data is valid. (ii) Where an agreed method other than the standard DTC flow is to be used the response should address: <ul style="list-style-type: none"> • How you manage the approval / agreement of receipt / sending of data 		

Question	Guidance	Response	Evidence
	<p>in another agreed format,</p> <ul style="list-style-type: none"> • What records are retained of the agreement of the method as well as the actual data received / sent; and • How you ensure that timescales surrounding this data are adhered to. <p>(d) Controls in place to ensure that all data required or expected is received and that all data to be sent is sent in a timely manner. This may be through controls within the update routines or through manual controls.</p>		
<p>17.1.5 What controls do you have in place to ensure that the requirements of BSCP520 are met when a Change of Supplier (CoS) and/or Change of Agent (CoA) event takes place?</p>	<p>The response should cover how you identify when a CoA/CoS activity has taken place and should address the following:</p> <p>For Half Hourly UMS CoS</p> <ol style="list-style-type: none"> (1) Receipt and processing of appointment details. (2) Sending of latitude and longitude information and inventory details via P0068 data flow. (3) Existence of procedures for agreeing with the Supplier that the existing UMS Certificate continues to meet the requirements of BSCP520 (4) Existence of agreed procedures with the appointed Meter Administrator for the checking and agreement of UMS inventories. <p><u>For NHH CoS</u></p> <ol style="list-style-type: none"> (5) Receipt and processing of appointment details. (6) Receipt and processing of Termination of Appointment details. 		

Question	Guidance	Response	Evidence
	<p>(7) Existence of procedures for agreeing with the Supplier that the existing UMS Certificate continues to meet the requirements of BSCP520</p> <p><u>Change of MA</u></p> <p>(8) Receipt and processing of appointment details.</p> <p><u>Change of NHHDC</u></p> <p>(9) Receipt and processing of appointment details.</p>		
<p>17.1.6 What controls do you have in place to ensure that the requirements of BSCP520 are met when a change of energisation status takes place?</p>	<p>The response should address the following:</p> <p>(1) Receipt and processing of energisation status change requests via D0134 data flows</p> <p>(2) Sending of confirmation of energisation status change D0139 data flows to MA/Supplier (HH traded UMS)</p> <p>(3) Sending of confirmation of energisation Status change D0139 data flows to NHHDC/Supplier (NHH traded UMS)</p> <p>The response should also provide details of:</p> <p>(a) How you ensure that a D0139 is sent for each D0134 data flow received</p> <p>(b) How you receive/process change of energisation requests which are not submitted via a data flow but through other agreed methods.</p>		
<p>17.1.7 What controls do you have in place to ensure that the requirements of BSCP520 are met when a disconnection is</p>	<p>The response should address the following:</p> <p>(1) The receipt and processing of disconnection request via D0132 data flow</p> <p>(2) Procedures in place to identify and perform any</p>		

Question	Guidance	Response	Evidence
<p>required following de-energisation of an MSID?</p>	<p>physical site work required</p> <p>(3) The sending of disconnection request/confirmation via P0175 and D0125 data flows</p> <p>(4) The receipt and processing of termination of appointment date (if NHH).</p> <p>The response should also provide details of:</p> <p>(a) How you ensure that a D0125 / P0175 is sent for each D0132 data flow received</p> <p>(b) How you receive/process disconnection requests which are not submitted via a data flow but through other agreed methods.</p>		
<p>17.1.8 How have you ensured that you have appropriate audit trails in place?</p>	<p>The UMISO should retain data to allow the Supplier to fulfil all its obligations under the BSC. The response to this question should address how such data is stored, including the following key items:</p> <p>(1) Copies of Connection Agreements and evidence that Connection Agreements are in place and have been sent to the customer.</p> <p>(2) Evidence of data sent and received. This data may be in either data flow format or otherwise (e.g. fax/email) and the agreed method should be formalised and recorded.</p> <p>(3) EAC values and evidence of calculations (for NHH UMS) including evidence to support changes made to inventories and subsequent re-calculations of EACs.</p> <p>(4) Summary inventories and history of changes to inventories (for HH UMS)</p>		

Question	Guidance	Response	Evidence
	<p>(5) Copies of UMS Certificates and evidence to confirm that these, and D0052 data flows, have been sent</p> <p>(6) Evidence to support changes to UMS Connections and communications of the changes to relevant parties.</p>		
<p>17.1.9 How have you ensured that you can meet the data retention requirements set out in BSC Section U1.6 and BSCP520 section 1.2.1(j)?</p>	<p>Section U1.6 sets out the requirements on Parties and their Party Agents to retain Settlement Data for:</p> <p>(1) 28 months after the Settlement Day to which it relates on-line;</p> <p>(2) Until the date 40 months after the Settlement Day to which it relates in an archive; and</p> <p>(3) At the request of the Panel, for more than 40 months if needed for an Extra Settlement Determination.</p> <p>The response should address the following:</p> <p>(a) Controls to ensure that any archived data can be retrieved within 10 Business Days.</p> <p>(b) Systems and procedures to ensure that all data that is retained is in a form in which the data can be used in carrying out a Settlement Run or Volume Allocation Run.</p>		