

CP Progression – CP1368

Meeting Name	Supplier Allocation Volume Group
Meeting Date	6 June 2012
Purpose of paper	For Decision
Summary	This report provides details of the background, solution, impacts and industry views of CP1368 'Clarify/Resolve Operational Issues Related to Unmetered Supplies in SMRS'. Following endorsement by the PAB, the SVG is requested to consider the report and to reach a decision on whether to approve the CP.

Why Change?

1.1 Background

1.1.1 ELEXON proposes a number of changes to provide further clarification and resolve operational issues related to Unmetered Supplies (UMS) registered in the Supplier Meter Registration Service (SMRS). This Change Proposal (CP) is intended to address all these issues together. The attached red-lined changes have been reviewed by the Unmetered Supplies User Group (UMSUG) and the Supplier Volume Allocation Group (SVG).

1.2 What is the issue?

1.2.1 New equipment and processes have come into the UMS arena and the relevant BSCPs need to be changed to accurately accommodate the revised processes and requirements on market participants.

2. Solution

2.1 CP1368 'Clarify/Resolve Operational Issues Related to Unmetered Supplies in SMRS' was raised on 2 March 2012. There are six sets of changes proposed:

1. SVG directed ELEXON to review the Photo Electric Control Unit (PECU) Array Siting processes defined in BSCP520, following an issue between a Licensed Distribution System Operator (LDSO) and a Meter Administrator (MA). Following consideration of the issues, it was proposed not to change BSCP520 but to put guidance into the Operational Information Document (OID). Subsequently, the SVG has directed that the changes should be incorporated into BSCP520 to reflect the changes made in the OID.

This CP therefore makes changes to the PECU Array Siting Procedure in BSCP520 to mirror previous changes¹ made to the guidance in the OID. This includes providing information on:

- sharing PECU arrays;

¹ (As directed by the SVG (SVG 123/02)).

- determining the use of multiple or single PECU arrays; and
- appropriate research to inform the siting of PECU arrays.

The CP also introduces a mirror requirement in BSCP537 Appendix 1: Self Assessment Document (the SAD).

2. BSCP520 sections 3.1.8, 3.3.1.5 and 3.3.1.11 currently require Unmetered Supplies Operators (UMSOs) to send the P0068 EM Technical Details to Suppliers. Suppliers have indicated they have no interest in receiving this data, and therefore the UMSOs are no longer sending it to them. Consequently this is causing audit issues for UMSOs. This CP therefore removes the requirement from BSCP520.

3. Before changes were made to the validation rules that apply when registering UMSOs and MAs in SMRS (via CP1267²), where an MA did not have the same ID as the Meter Operator Agent (MOA), the MA was not recognised as a valid entry in the MOA field. This was rectified by the implementation of CP1267. However, in order to ensure that the Supplier properly populates this information in the SMRS, this CP requires Suppliers to send the D205 flow (Supplier initiated update of registration details) to the SMRS upon a change of MA.

4. CP1341³ was raised to ensure that BSC Settlement arrangements would not prevent UMS customers achieving energy savings by using multi-level static dimming devices. In order for UMS customers to use multi-level static dimming devices CP1341 requires customers to undertake a number of steps. One such step is for the customer to provide the Charge Codes and Switch Regime information to the UMSO in its detailed inventory. The UMSO is then required to validate the UMS customer's inventory against ELEXON's website table of valid product/Charge Code/ballast/Switch Regime combinations, before making the appropriate Estimated Annual Consumption (EAC) calculation.

However, BSCP520 section 1.2.1 (q) only makes reference to the UMSO validating against the OID and 'associated' spreadsheets. Although the term 'associated' spreadsheets includes the Valid Dimming Combination spreadsheet, the UMSUG believes that the wording should be specific. This CP therefore amends the wording to explicitly state that UMSOs should validate static dimming devices against the Valid Dimming Combination spreadsheet.

5. BSCP520 currently specifies that the Equivalent Meter (EM) software should have the ability to produce and validate UMS data from the EM database for each Metering System Identifier (MSID) for each Settlement Day. MAs should also recalculate UMS data (from time to time as more accurate data becomes available) - for each MSID for each Settlement Day. CP1368 therefore mandates that this will occur. This requirement will also be mirrored in the SAD.

² Registration of UMSOs and MAs in SMRS

³ Unmetered Supplies: Accommodating Multi-Level Static Dimming Devices in Half-Hourly and Non-Half Hourly Settlement

6. 'Managing Unmetered Energy Street Lighting Inventories' (MUESLI) is a document endorsed by the ADEPT Lighting Group, ELEXON, the Energy Networks Association, the Institute of Lighting Professionals, the UK Lighting Board and the Local Government Technical Advisers Group as representing good practice in establishing, maintaining and auditing inventories for unmetered street lighting supplies. This CP aligns BSCP520 and the SAD with this document, and will allow the UMISO to review and adjust the customers' EACs following the results of an LDSO inventory audit.

3. Industry Views

- 3.1 CP1368 was issued for participant Impact Assessment via CPC00709. We received seven responses of which all agreed with the change.
- 3.2 The breakdown of responses is shown in the following table and the full collated participant responses to CP1368 are available on the ELEXON website [here](#) (hyperlink to the published CPC responses).

Respondent Role	Respondent Support		
	Yes	No	Neutral
LDSOs	3	0	0
DC/DA/MOA	1	0	0
Suppliers	1	0	0
Mixed (i.e. two or more of Supplier, Generator, Trader, Party agent or Distributor)	2	0	0
Total	7	0	0

- 3.3 Respondents that commented on the change agreed that the CP better reflects current practice. However one respondent expressed concern about the lack of details around the adjustment of EACs and summary inventories to reflect audit results. The respondent believes the principle is sound but that greater clarity is required around the adjustment. ELEXON notes the respondent's concern and has explained that details of how the summary inventory will be used to calculate the EACs and how the correction factor will be applied to the summary inventory were deliberately not prescribed to allow UMISOs to agree how best to make the adjustment themselves (without being constrained by a mandated process). ELEXON suggested to the respondent that the best way to progress their concerns at this stage would be to seek guidance from the UMISUG. The respondent agreed with this approach.

3.4 Comments on the Proposed Redlining

Redline Comments			
Organisation	Doc Name and Location	Comment	ELEXON recommendation
ScottishPower	BSCP520 1.2.1 (q)	We recognise that the Valid Dimming Combination spreadsheet is still in development phase and is required to be in place by the proposed implementation date of 1 November 2012.	The respondent has been informed that the Valid Dimming Combination Spreadsheet is published and



			in use. The respondent accepted this.
ScottishPower	3.1.1	As above.	As above.
ScottishPower	3.4.3	ScottishPower will be required to implement a new internal control process to monitor this change.	The respondent was contacted and said that this comment was just to inform us that they will need to do this.
ScottishPower	4.5.1.1	Within the PECU Array Variations it suggests that if there is a variation in the number of PECU arrays proposed by the MA, (previously Supplier), how will the MA notify multiple suppliers, or as if suggested Sharing PECU Arrays, what if the MA is not the lead MA, who has the responsibility for advising all MA's.	The respondent was contacted and informed that the MA is not required to notify the Supplier. The respondent accepted this.
Power Data Associates Ltd	3.3.1.5	The agreed geographical location will always be required irrespective of whether the EM is passive or dynamic. In a dynamic EM it is used to calculate switching times for time switches or for default arrangements in the event of PECU array failure. Suggest deletion of "in the event of Passive HH Trading."	Agreed and amended.
Power Data Associates Ltd	3.4.1	Although not part of the change, suggest alignment of the flows against the two parties could be improved.	Agreed and amended.
Power Data Associates Ltd	3.14.4	Suggest action should read "Send corrected data calculated in accordance with 3.9.1.1"	Agreed and amended.
Power Data Associates Ltd	4.1, 4.2 and 4.3	These do not read well, and are misleading, until you realise the reference to Charge codes and Switch Regimes is a hyperlink. The hyperlink should be entitled "Charge Codes and Switch Regimes page of the BSC website".	Agreed and amended.
Power Data Associates Ltd	4.4.4	The hyperlink to the ILP website does not work. They have recently re-launched their website and the new link is "https://www.theilp.org.uk/documents/unmetered-electricity/"	Agreed and amended.
Power Data Associates Ltd	4.4.4	The following alternative texts are supplied as per our response to Question 6 above. The our preferred approach ensures that the additional 'uplift' consumption is clearly visible to all parties and that the appropriate correction factor is	While we appreciate the concerns of the respondent we feel that the appropriate forum for discussing these issues further is the UMSUG. The respondent has accepted



		<p>applied to Half Hourly and Non Half Hourly inventories.</p> <p>The preferred approach involves an additional section in the OID and creation of a single 'consumption adjustment' charge code rated at 1,000 circuit watts for use in consumption adjustments.</p> <p>Preferred Approach</p> <p>4.4.4 Consumption Adjustments following LDSO Inventory Audits</p> <p>Where an audit of a customer's inventory has been undertaken by the LDSO in accordance with the best practice document: Managing Unmetered Energy Street Lighting Inventories (MUESLI) published on the Institute of Lighting Professionals website:</p> <p>ILP Website</p> <p>then the UMSO will prepare a revised inventory by applying any correction factor calculated in accordance with, and as defined, in the above best practice document.</p> <p>The Operational Information Document details the methodology for applying a correction factor to the existing inventory to produce a revised inventory as required by this paragraph.</p> <p>The Customer will be deemed to have agreed that the revised inventory of Apparatus relative to that particular Unmetered Supply is that agreed between the LDSO on whose Distribution System or Associated Distribution System the Unmetered Supply takes place and the Customer taking such supply as defined in paragraph 8.2.4 of Section S8 of the BSC.</p> <p>Paragraph for OID</p> <p>Where it has been agreed that a revised inventory will be prepared in accordance with Section 4.4.4 of BSCP520, the UMSO shall calculate the load in watts per switch regime listed in the existing summary inventory.</p>	<p>this.</p>
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		<p>To determine the above load, the circuit watts for all charge codes with the same switch regime will be multiplied by the number of items for each charge code and totalled. The total load per switch regime will be multiplied by the correction factor to derive the new total load for that switch regime. The difference between the two will be the audit adjustment.</p> <p>An entry per switch regime in the original inventory will then be added to the summary inventory using the 1,000 watt consumption adjustment charge code to represent the increased load (audit adjustment) per switch regime. This additional load when used within the equivalent meter, or the EAC calculation, will result in the increased consumption determined by the audit.</p> <p>In the following simple example if an inventory only contained 2,000 items with a circuit rating of 80W and 5,000 items with circuit rating of 50W against switch regime 821, the total load in watts for switch regime 821 would be $((2,000 \times 80) + (5000 \times 50))$ 410,000 watts. Applying a correction factor of 1.12 increases the load to 459,200 watts. An entry of 49 items, using the switch regime 821 & the consumption 'uplift' charge code (of 1000 watts), will be added to the inventory to produce the revised inventory.</p> <p>This approach is to be used for both Half Hourly and Non Half Hourly inventories. A uniform approach prevents issues with customers switching from one method of trading to the other.</p>	
Power Data Associates Ltd	3.2.3	<p>In order to respond to customer queries it should be visible to a MA that a revised summary inventory has been prepared in accordance with 4.4.4.</p> <p>In the action column of 3.2.3 we suggest the inclusion of the following.</p> <p>"Where the revised summary Inventory details have been prepared in accordance with 4.4.4, the UMISO shall provide details of the correction factor used in its preparation"</p>	As above.
Power Data Associates Ltd	4.5.1.1	<p>In the first sentence of the paragraph headed Research, replace "inform" with "determine".</p>	Agreed and amended.

4. Intended Benefits

4.1.1 These changes have been directed by the SVG in order to ensure that new equipment and processes are defined and undertaken in the Settlement of Unmetered Supplies under the BSC.

5. Impacts and Costs

5.1 The following table summarises the ELEXON effort required to implement CP1368 and the Impact on market participants.

Market Participant	Cost/Impact	Implementation time needed
ELEXON (Implementation)	£360	1.5 man days
DC/DAs	£0 / minimal impact	0 calendar days
LDSO, DNO	Costs ranged from no costs to administrative costs <£1000 / No adverse impacts	0 – 180 calendar days
Supplier	£0 / no impact	30 - 60 calendar days

6. Implementation Approach

6.1 The requested Implementation date for CP1368 is 1 November 2012.

7. Recommendations

7.1 The ISG is invited to:

- a) **APPROVE** the proposed amendments to BSCP520 and BSCP537 Appendix 1: Self-Assessment Document (SAD);
- b) **APPROVE** CP1368 for implementation on 1 November 2012, as part of the November 2012 Release.

Attachments:

Attachment A – redlining BSCP520

Attachment B – redlining BSCP537 Appendix 1

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