# CP Report – CP1386 v2.0

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|---|---|
| **Meeting Name** | Supplier Volume Allocation Group |
| **Meeting Date** | 2 April 2013 |
| **Purpose of paper** | For Decision |
| **Summary** | This report provides details of the background, solution, impacts and industry views for CP1386 v2.0 'Improving Settlement Accuracy for Unmetered Supply on a Change of Supplier or Change of Agent'. ELEXON invites the SVG to approve CP1386 v2.0 for implementation in the November 2013 Release. |

## 1. Why Change

### Background

The current processes for a Non Half Hourly (NHH) Unmetered Supply (UMS) Change of Supplier (CoS) and Change of Agent (CoA) are based on metered processes where it is important to exchange historic consumption data between agents.

The current obligations rely on the old NHH Data Collector (NHHDC) sending Estimated Annual Consumption (EAC) values to the new NHHDC. However, during the CoS and/or CoA process for UMS sites, some Parties have found that the new NHHDC does not receive the required EACs from the old NHHDC.

To help address this, a number of UMS Operators (UMSOs) currently participate in an industry workaround where the UMSO sends the EAC directly to the new NHHDC. This is possible for UMS sites because all consumption data/UMS inventory is agreed between the UMSO and the Customer, within the National Terms of Connection (NTC) agreement.

### What is the issue?

BSCP520[1] does not currently recognise the process associated with the industry workaround. This process therefore may not be followed within a timely manner or may not followed at all. Formalising the workaround in BSCP520 will ensure robust UMS CoS/CoA processes.

[1] 'Unmetered Supplies Registered in SMRS'.


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## 2. Solution

### CP1386 v1.0

RWE npower raised CP1386 on 30 November 2012. The CP proposed changes to BSCP520 Sections 3.3.2 and 3.5 to mandate that, in the case of a NHH UMS CoS/CoA, the UMSO is required to send the EAC via a D0052 'Affirmation of Metering System Settlement Details' flow to the new NHHDC. The CP proposed to remove the existing obligations to request and send data from/to the old NHHDC.

The CP also proposed changes to BSCP501[2] Section 1.7, adding a timescale to the existing process whereby the Licenced Distribution System Operator (LDSO) is obliged to inform the UMSO of changes in registration data.

Two minor housekeeping changes were also included with the Proposer's agreement. These correct a footnote reference in BSCP501 Section 3.10.13 and add a clarification to BSCP520 Section 1.2.1 to support the implemented CP1341[3].

You can find the original proposed redlining for CP1386 v1.0 on the BSC Website here.

### CP1386 v2.0

Following the Participant Impact Assessment of CP1386 v1.0, a second version of the CP (CP1386 v2.0) was created. The aim of the CP and its overall solution are unchanged, but the redlined changes to BSCP501 and BSCP520 have been revised to take into account the comments made by respondents.

Changes to BSCP504[4] Section 3.4.1.1 have also been included, following comments from one respondent and to reflect the changes to BSCP520.

Attachments A-C contain the proposed redlined changes to BSCPs 501, 520 and 504 for CP1386 v2.0.

[2] 'Supplier Meter Registration Service'.
[3] 'Unmetered Supplies: Accommodating Multi-Level Static Dimming Devices in Half-Hourly and Non-Half-Hourly Settlement'.
[4] 'Non-Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'.


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## 3. Impacts and Costs

### Central Impacts and Costs

CP1386 v2.0 will require updates to BSCP501, BSCP504 and BSCP520 which will involve a minor cost to implement. There are no central system changes required.

| ELEXON Costs | | |
|---|---|---|
| **Document Changes** | **System Changes** | **Total** |
| 1 Man Day's effort (£240) | None | £240 |

### Party Impacts and Costs

The impacts on respondents, following the Impact Assessment of CP1386 v2.0, are summarised below.

| Party Impacts | |
|---|---|
| **Party Type** | **CP1386 v2.0 Impacts & Costs** |
| **Supplier** | None. |
| **Supplier Agent** | Minor – minimal. |
| **Distributor** | None. |
| **Mixed role** | Mixture of minor to significant.<br>£6,000 for one LDSO.<br>Significant cost to another LDSO/UMSO. |

## 4. Implementation Approach

The proposed Implementation Date for CP1386 v2.0 is 7 November 2013 as part of the **November 2013 Release.**

No respondents disagree with this implementation approach.


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## 6. Industry Views

### CP1386 v1.0

CP1386 v1.0 was issued for Participant Impact Assessment via CPC00721. We received 13 responses of which 10 agreed with the CP, two disagreed and one was neutral. The table below summarises the responses.

We received another confidential response which did not support the CP. This is not included in the table or the full responses in Attachment D as the respondent wished to keep the content of their response confidential. However, the confidential response is provided in Attachment F for SVG Members only.

| Summary of Responses for CP1386 v1.0 | | | |
|---|---|---|---|
| **Organisation** | **Capacity in which Organisation operates** (Supplier, Distributor, LDSO, etc.) | **Agree?** | **Impacted?** |
| British Gas | Supplier | Yes | No |
| EDF Energy | Supplier, MOA | Yes | Yes |
| Electricity North West Limited | Distributor | Yes | Yes |
| GDF SUEZ Marketing Ltd | Supplier | Neutral | No |
| IMServ | HHDC, NHHDC, HHDA, NHHDA, HHMOA, NHHMOA | Yes | Yes |
| Northern Powergrid | LDSO, UMSO | Yes | Yes |
| npower | Supplier and Supplier Agents (NHH and HH) | Yes | Yes |
| Power Data Associates | Meter Administrator | Yes | No |
| ScottishPower | Distributor, Supplier, Supplier Agents | No | Yes |
| SSE | Supplier & Party Agents | Yes | Yes |
| SSE Power Distribution | LDSO | Yes | No |
| TMA Data Management Ltd | NHHDC, NHHDA, HHDC and HHDA | Yes | Yes |
| Western Power | LDSO | No | Yes |

The majority of respondents, covering a range of different roles, supported CP1386 v1.0. Those that provided comments expressed views that it would improve UMS consumption accuracy in Settlement, provide clarity over timescales and aid process consistency.

There were two responses that did not support CP1386 v1.0. One respondent did support the change in principle, as they already have the processes set up and in place. However, they had concerns over the proposed redlined changes, detailed below, which prevented them from supporting the change.


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The other respondent who did not support CP1386 v1.0 did so on the grounds that they believe the existing process is fine. The workaround was introduced as a means for the EAC to be passed on where NHHDCs were failing to follow the required processes. The respondent believes that more work should be done instead to ensure that NHHDCs are completing the activities which they are currently mandated to undertake, rather than formally passing the responsibility to another role through CP1386.

### Comments on the CP1386 v1.0 Redlining

We received a number of comments on the CP1386 v1.0 proposed redlined changes to BSCP501 and BSCP520, both from those supporting the CP and those that did not. The actions taken in response to the comments received are summarised below. Attachment D contains the complete redlined text comments for CP1386 v1.0, along with any supporting responses and details of the actions taken following our discussions with the Proposer.

One change was made to the proposed BSCP501 redlining for inclusion in CP1386 v2.0:

- The proposed 2WD timescale where the LDSO would notify the UMSO of a change to a UMS was removed from the 'Use of the Procedure' Section 1.7. Section 1.7 was then amended to refer to the 2WD timescales that had been added to the appropriate interface tables in Sections 3.5, 3.6 and 3.7.

Four changes were made to the proposed BSCP520 redlining for inclusion in CP1386 v2.0 as follows:

- Correction of cross-references to previous steps in Section 3.3.2;
- Removal of duplication of 'Appointment and Terms' in the flow information required after D0155[5] in Section 3.3.2.4;
- Merging two new proposed steps (steps 3.3.2.7 and 3.3.2.8) to prepare and send the D0052, and increasing the timescale to 'Within 10 WDs'; and
- Adding the New Supplier and Supplier as recipients of the D0052 for the new steps in Sections 3.3 and 3.5.

As noted in Section 2 above, one respondent also identified an impact on BSCP504 3.4.1.1 to align it with the proposed BSCP520 changes. This was subsequently included in CP1386 v2.0 and splits out the proposed UMSO activity (sending the D0052 to the Supplier/NHHDC) from the existing Supplier activity (sending the D0205[6] to the Supplier Meter Registration Agent (SMRA)).

[5] 'Notification of Meter Operator or Data Collector Appointment and Terms'.
[6] 'Update Registration Details'.


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## CP1386 v2.0

CP1386 v2.0 was issued for Participant Impact Assessment via CPC00723. We received nine responses of which six agreed with the CP and three disagreed.

The following table shows the breakdown of responses. All of the responses are non-confidential; the participant who provided the confidential response for v1.0 of the CP did not respond to CP1386 v2.0. You can find the full responses in Attachment E.

| Summary of Responses for CP1386 v1.0 | | | |
|---|---|---|---|
| **Organisation** | **Capacity in which Organisation operates** (Supplier, Distributor, LDSO, etc.) | **Agree?** | **Impacted?** |
| Power Data Associates | MA | Yes | No |
| IMServ | NHHDC | Yes | Yes |
| Electricity North West Limited | Distributor/UMSO | Yes | Yes |
| Western Power Distribution | LDSO | No | Yes |
| ScottishPower | LDSO and UMSO | No | Yes |
| TMA | HHDC, HHDA, NHHDC and NHHDA | Yes | Yes |
| Southern Electric Power Distribution (SOUT)<br>Scottish Hydro Power Distribution (HYDE) | Distributor | Yes | No |
| Northern Powergrid | LDSO, UMSO | No | Yes |
| British Gas | Supplier | Yes | No |

A majority of respondents support CP1386 v2.0 for similar reasons to CP1386 v1.0 (i.e. that the change formalises the existing workaround and provides clarity to the process).

Those that do not support CP1386 v2.0 reiterate concerns raised for v1.0 of the CP (i.e. disagreement with removing the responsibility for obtaining the UMS EAC from the NHHDC and placing it on the UMSO).

## Comments on CP1386 v2.0 Redlining

Respondents also provided comments on the proposed redlining. Following discussion with the Proposer, some of these comments have been addressed through the recommended revisions set out in the table below (which are also included in Attachment E). The recommended changes consist of:

- Alignment of timescale in BSCP520 Section 3.5.7 with the timescale in 3.3.2.7;
- Minor amendment to the proposed new process step description in BSCP520 Section 3.3.2.7; and
- A change to the order of a few process steps in BSCP520 Section 3.3.2.


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One respondent suggested that consideration could be given to amending BSCP515[7] to capture all the proposed obligations being placed upon the LDSO. The respondent believed that it is possible that an obligation placed upon the LDSO may be overlooked if it is not in the relevant BSCP.

We do not believe amendments to BSCP515 are necessary given that LDSO obligations relating to UMS were not intended to be covered in BSCP515. Therefore the changes to BSCP501 do not create any inconsistencies and the resulting risk of LDSOs overlooking the proposed obligations is minimal.

Furthermore, additional changes to BSCP515 as part of CP1386 at this stage would require a further iteration of the CP, which the Proposer has decided against to avoid delaying a decision on the CP.

| Redline Comments | | | |
|---|---|---|---|
| **Organisation** | **Document Name and Location** | **Comment** | **ELEXON's Recommendation** |
| Power Data Associates | BSCP504 3.4.1.1 | The Supplier sending a D0205 to SMRA isn't relevant here. It's not part of the collection activities. Suggest deletion. | Noted, however this change is not required and is outside of the scope of the CP.<br>The CP1386 v2.0 changes to BSCP504 split out the proposed UMSO activity (sending the D0052) from the existing requirement on the Supplier to send the D0205.<br>Any changes to the sending of the D0205 would require a separate CP. |
| Power Data Associates | BSCP504 3.4.1.1 | In footnote 2 the "or Supplier" has been correctly deleted as only the UMSO should send a D0052 for an unmetered supply. However the footnote goes on to say that the D0052 from the UMSO should be used in preference. Suggest the whole of the last sentence could be deleted. | Noted – Following discussions with the Proposer, no change is being recommended as, while the CP is mandating the UMSO to send the D0052, there may be other circumstances where a NHHDC has to use information other than the D0052. So leaving the sentence in the footnote keeps it clear that the NHHDC should use the info in the D0052 preferably, it doesn't rule out the situations where the D0052 isn't used. |

[7] 'Licensed Distribution'.


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| Redline Comments | | | |
|---|---|---|---|
| **Organisation** | **Document Name and Location** | **Comment** | **ELEXON's Recommendation** |
| Power Data Associates | BSCP520 3.3.5.6 | Suggest this action needs to be brought forward in the process to 3.3.2.4 as it would immediately follow the request in 3.3.2.3 for confirmation that the UMS meets the requirement of 1.1 and would be the response from the UMSO to the Supplier required by that request. | Noted – With the exception of process step 3.3.2.3 being re-instated as step 3.3.2.1, following other participant IA comments all the activities in Section 3.3 are not in chronological order, therefore there is no need to move step 3.3.2.6 back up to 3.3.2.2. |
| Western Power Distribution | BSCP520 3.3.2.3 | BSCP520 -3.3.2.3 Establish with the UMSO that the UMS meets the requirements of Section 1.1. – The Supplier should have established this before registering the MPAN, usually by means of the customer providing a Certificate of Unmetered Supply, which confirms the UMS meets the requirements of Section 1.1. 3.3.2.3 should be first action and become 3.3.2.1. | Noted – Following discussions with the Proposer, recommend re-instating step 3.3.2.3 as Step 3.3.2.1 and renumbering the subsequent steps accordingly. |
| Western Power Distribution | BSCP520 3.5.7 | Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new NHHDC appointment date – The timescale for this (5 wd) is not consistent with change of supplier 3.3.2.7 (10 wd). This will cause confusion and put an unfair timescale on small UMSO teams | Noted - Following discussions with the Proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 to match the 10WD timescale in 3.3.2.7, for better consistency. |
| ScottishPower | BSCP501 1.7 Para 4 | ScottishPower are pleased to note that following our initial comments (concerns) regarding the introduction of a timescale, this has been removed, though we note that it is instead inserted into the relevant interface tables within the BSCP. | Noted – no action required. |


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| Redline Comments | | | |
|---|---|---|---|
| **Organisation** | **Document Name and Location** | **Comment** | **ELEXON's Recommendation** |
| ScottishPower | BSCP501 3.5.5 (Change of DA) 3.6.6 (New Connection) 3.7.6 (Change of Supplier) | As stated in Point 1 above, the timescale in 1.7 Para 4 has rightly been removed. However it is then restated within the 3 areas listed here. As per the ScottishPower original response, Registration changes are made by Supplier Flows and as such are not passed back separately, or routed via our LDSO, who instead have separate access to ECOES for Registration information. From the opposite perspective, for ScottishPower, LDSO to UMSO registration information would only occur as a result of a new customer where a new MPAN is created, and this is automatically passed into our SMRS and a weekly interface created to record same on our UMSO data.<br>We understand that DNO's will have different arrangements/systems for controlling data flows, and some may well include routing (automatic or otherwise) to UMSO via an LDSO system. As stated above, we link SMRS data direct to UMSO but via a weekly interface which then allows manual updates to be made and records to be matched.<br>While we do not use the steps as defined in the new BSCP 501, ScottishPower still believe that the wording (timescale) demands automatic transfer and update of data should that ever be the case. We believe that the 2 day requirement should be removed completely and amended to a more realistic period such as 10 days. | Noted – Following discussions with the Proposer, they want to keep the proposed 2WD timescales in BSCP501 as they are. |
| ScottishPower | BSCP520 1.2.1 (q) | Agreed, and already in place within ScottishPower | Noted – no action required. |


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| Redline Comments | | | |
|---|---|---|---|
| **Organisation** | **Document Name and Location** | **Comment** | **ELEXON's Recommendation** |
| ScottishPower | BSCP520 3.3.2 (1-4) | The order of the Actions/Steps has changed and this is not agreed. The current order requires that Supplier confirms with the UMSO that the UMS meets requirements of Section 1.1, and that the UMSO sends sight of current UMS Certificate before Registration. This ensures that the Supplier has received the correct EAC Information from the Customer before registration occurs. Thereafter Supplier sends Registration details. The revised proposal still suggests Supplier sends Registration details first then checks supply meets UMSO requirements – we believe this to be inefficient in that there is a strong risk that the Supplier might not liaise fully with Customer regarding the need for a UMS Certificate (complete with relevant EAC) and may also cause a need to undo incorrect registrations and indeed inaccurate EAC information. | Noted – Following discussions with the Proposer, recommend re-instating step 3.3.2.3 as Step 3.3.2.1 and renumbering the subsequent steps accordingly. |
| ScottishPower | BSCP520 3.3.2.6 | As stated in our initial response, this is now occurring late in the process, rather than at the outset of the process. ScottishPower would add that a potential new Supplier would have no right to receive flows until registration takes place (e.g. the D0052 Flow, but they can and we believe should of course verify the supply is correctly UMS and that a current certificate exists. | Noted – with the exception of process step 3.3.2.3 being re-instated as step 3.3.2.1, all the activities in Section 3.3 are not currently in chronological order, therefore there is no need to move step 3.3.2.6 back up to 3.3.2.2.<br>The Proposer wants to keep 3.3.2.6 where it is. |
| ScottishPower | BSCP520 3.3.2.7 | ScottishPower note and welcome the consolidation of the actions and the revised timescales (Within 10 Days) | Noted – no action required. |
| ScottishPower | BSCP520 3.5.7 | ScottishPower note and welcome the inclusion of both the New Supplier AND the New NHHDC as recipients of the D0052 Flows. However we note the timescale proposed is 5 Days and feel that for consistency this would better be aligned to the revised timescale in 3.3.2.7 (10 Days) | Noted - Following discussions with the Proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 to match the 10WD timescale in 3.3.2.7, for better consistency. |


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| Redline Comments | | | |
|---|---|---|---|
| **Organisation** | **Document Name and Location** | **Comment** | **ELEXON's Recommendation** |
| ScottishPower | BSCP520 Additional point? | ScottishPower reaffirms our view that the Supplier is the Contracting Party and the NHHDC is their appointed Agent. The Supplier should have the obligation of ensuring their Agent has and correctly processes the D0052. Otherwise it is left to the UMSO to follow up errors. We would therefore prefer to see an additional step to reflect this obligation. | Noted – The obligations on the NHHDC are set out in BSCP504, which in this case would be the requirements for the NHHDC to convert the D0052 into a D0019.<br><br>Therefore no change is required. |
| ScottishPower | BSCP504 | Changes are agreed and relevant UMSO processes are already in place within ScottishPower | Noted – No action required. |
| Northern Powergrid | BSCP520 3.5.7 | We have concerns relating to the requirement to align the EAC effective from date to the Supplier / NHHDC effective from dates, we do not believe this would be the true EAC effective from date and we would require a significant change to internal systems to accommodate this. We believe that the NHHDC should align the EAC effective from date to the Supplier / NHHDC effective from date as set out in the BSC currently. | Noted.<br>Following discussions with the Proposer, recommend changing the process step description of 3.5.7 from:<br>"Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the new NHHDC appointment date."<br>To:<br>"Prepare and send D0052 flows for each MSID. The EAC EFD within the initial D0052 shall align with the Supplier Start Date." |
| Northern Powergrid | BSCP520 3.5.7 | We agree that timescales are required for sending the D0052 flow, however we noted that the timescales defined within BSCP 520 for sections 3.3.2.7 and 3.5.7 differ between 5 WD and 10WD; we believe that the same timescales should apply to both requirements for consistency. | Following discussions with the Proposer, recommend changing the 5WD timescale in BSCP520 3.5.7 to match the 10WD timescale in 3.3.2.7, for better consistency. |


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## 7. Recommendations

### Assessment Review

We agree with the majority of respondents that the CP will formalise an existing workaround and introduce timescales to that workaround, aiding the accuracy of Settlement by ensuring that the relevant NHHDC and Supplier receive the required and timely UMS EAC.

### Recommendation

ELEXON invites the SVG to:

a) **APPROVE** CP1386 v2.0 for implementation on 7 November 2013, as part of the November 2013 Release; and

b) **AGREE** the proposed amendments to BSCP501, BSCP504 and BSCP520, including the amendments specified in this paper and in Attachment E.

### Appendices:

None

### Attachments:

Attachment A – CP1386 v2.0 BSCP501 Redlining
Attachment B – CP1386 v2.0 BSCP520 Redlining
Attachment C - CP1386 v2.0 BSCP504 Redlining
Attachment D – CP1386 v1.0 Non-Confidential Consultation Responses
Attachment E – CP1386 v2.0 Non-Confidential Consultation Responses
Attachment F – CP1386 v1.0 Confidential Consultation Response *(confidential for SVG only)*

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