



CP Report – CP1403

Meeting Name Supplier Volume Allocation Group

Meeting Date 4 March 2014

Purpose of paper For Decision

Summary This report provides details of the background, solution, impacts and industry views for Change Proposal (CP) 1403 'Additional requirements to BSCP15 and BSCP25 for System Operators to provide more information on new connections'. ELEXON invites the SVG to consider the report and to approve CP1403 for implementation in the June 2014 Release.

1. Why Change?

Background

The Trading Disputes Committee (TDC) recently upheld two Trading Disputes ([TDC172/DA505](#) and [TDC179/DA532](#)). These related to the connection of an offshore wind farm, which was not being reflected in the Aggregation Rule of a Grid Supply Point (GSP). ELEXON conducted a "lessons learned" exercise, and determined that the issue could have been identified in the registration process had it been aware of all connection points at the site.¹

What is the issue?

Changes are required to BSCP Procedure (BSCP) 15² and BSCP25³, to require the Registrant and the System Operator⁴ to provide more information to the Central Registration Agent (CRA) and ELEXON for new connections to the Transmission System or any Distribution Systems. This will avoid a repeat of the above issue which resulted in a combined Settlement Error of approximately £30million.

2. Solution

ELEXON raised CP1403 'Additional requirements to BSCP15 and BSCP25 for System Operators to provide more information on new connections' on 26 November 2013 to address this issue.

CP1403 proposes the following amendments to BSCP15 and BSCP25:

¹ At its meeting on 3 September 2013, the SVG noted the DA505 lessons learned findings as set out in confidential Panel paper 215/11.

² 'BM Unit Registration'.

³ 'Registration of Transmission System Boundary Points, Grid Supply Points, GSP Groups and Distribution Systems Connection Points'.

⁴ Transmission Company / Licensed Distribution System Operator (LDSO).

Amendments to BSCP15 'BM Unit Registration'

Amend BSCP15/4.1 form and section 3.1 (Registration of BM Unit with Metering Systems Registered with the CRA) by adding the following mandatory requirements:

- Provide single line diagram(s) showing the location of the Metering Equipment: in particular the Settlement current and voltage transformers (CTs/VTs) and CT/VT ratios, and all existing and proposed Boundary Points (BP) and any System Connection Points (SCP) at the site;
- Add that, in the case of a non-standard Balancing Mechanism (BM) Unit, the applicant needs to provide a supplementary letter explaining why it believes that the BM Unit should be non-standard; and
- Add a 'fuel type' to the form as this is needed to calculate the Credit Assessment Load Factor (CALF) value.

Amendments to BSCP25 'Registration of Transmission System Boundary Points, Grid Supply Points, GSP Groups and Distribution Systems Connection Points'

Amend BSCP25/5.1 form (Registration of a Transmission System Boundary Point) by adding the following mandatory requirements / questions:

- Is this Boundary Point the only Boundary Point or Systems Connection Point at this site?
- If the site is also a GSP, is it a Shared GSP?
- At what voltage will this connection be made? 400kV / 275kV / 132kV / 33kV / other (please indicate voltage) (*delete as appropriate)
- Will the Boundary Point Metering System be located at the Boundary Point?
- If No, what is the distance between the Metering System and the Boundary Point?
- Will an application for Metering Dispensation be required? Yes/No*
- If the Boundary Point Metering System is not located at the Boundary Point and no application for Metering Dispensation is required, please indicate why not
- Provide contact details of all connected Parties
- Provide single line diagram(s) showing location of the Boundary Points and any System Connection Points and all existing and proposed Boundary Points and any System Connection Point Metering Systems at the site.

Amend BSCP25/5.2 form (Registration of a Distribution System Connection Point) by adding the following mandatory requirements / questions:

- Is this Systems Connection Point the only Systems Connection Point or Boundary Point at this site?
- If the site is also a GSP, is it a Shared GSP?

- At what voltage will this connection be made? 132kV / 33kV / 11kV / other (please indicate voltage) (*delete as appropriate)
- Will the Systems Connection Point Metering System(s) be located at the Systems Connection Point(s)?
- If No, what is the distance between the Metering System and the Systems Connection Point?
- Will an application for Metering Dispensation be required? Yes/No*
- If the Systems Connection Point Metering System is not located at the Systems Connection Point and no application for Metering Dispensation is required, please indicate why not
- Provide contact details of all connected Parties
- Provide single line diagram(s) showing the location of the System Connection Points and any Boundary Points and all existing and proposed System Connection Points and any Boundary Point Metering Systems at the site.

Amend BSCP25/5.3 form (Registration of Grid Supply Points) by adding the following mandatory requirements / questions:

- Is it a Shared GSP? (and remove references to Shared Busbar)
- Is this Systems Connection Point the only Systems Connection Point or Boundary Point at this site?
- At what voltage will this connection be made? 400kV / 275kV / 132kV / 33kV / other (please indicate voltage) (*delete as appropriate)
- Will the Systems Connection Point Metering System(s) be located at the Systems Connection Point(s)?
- If No, what is the distance between the Metering System and the Systems Connection Point?
- Will an application for Metering Dispensation be required? Yes/No*
- If the Systems Connection Point Metering System is not located at the Systems Connection Point and no application for Metering Dispensation is required, please indicate why not
- Provide contact details of all connected Parties
- Provide single line diagram(s) showing location of the System Connection Points and any Boundary Points and all existing and proposed System Connection Points and any Boundary Point Metering Systems.

You can find the full redlined changes in Attachments A and B.

3. Impacts and Costs

Central impacts and costs

CP1403 will require updates to BSCP15 and BSCP25. The following table shows the estimated ELEXON implementation effort:

ELEXON estimated costs and potential impacts		
Document Changes	System Changes/Impacts	Total Costs
BSCP15	No system changes or impacts identified.	1 man day equating to £240
BSCP25		

Participant impacts and costs

National Grid was the only respondent to the CP Impact Assessment that indicated an impact. It advised that this will involve additional information being provided when registering new connections, which should mitigate the risk of issues occurring that require Trading Disputes. It also commented that modifications to the forms formalise changes that have been adopted as 'custom and practice' by National Grid and ELEXON and are seen as improvements.

The other six respondents indicated no impact, and therefore identified no associated costs.

4. Implementation Approach

CP1403 is targeted for implementation on 26 June 2014 as part of the June 2014 BSC Systems Release.

5. ISG and SVG Initial Views

ELEXON presented the New CP Progression paper for CP1403 to the Imbalance Settlement Group (ISG) and the SVG at their December 2013 meetings ([ISG152/01](#) and [SVG154/06](#)).

An ISG Member commented that they were supportive of the aims of CP1403 but had some technical comments in relation to the draft redlined text for BSCP25.

The ISG Member questioned whether a Registrant of a Transmission System Boundary Point (TSBP) will know about other connections at the same 'wider' site, involving other participants, for the purposes of registering TSBPs. The ISG Member assumed that ELEXON and the Central Data Collection Agent (CDCA) would build up a comprehensive picture over time of what has been registered.

ELEXON clarified that the Transmission Company submits the BSCP25/5.1 form for the registration of a TSBP or a GSP. The Transmission Company would therefore know about the wider connections to its Transmission System and would consider multiple users on one site when submitting any BSCP25/5.1 forms. ELEXON also advised that BSCP25/5.2 is completed by an LDSO for the registration of a Distribution Systems Connection Point (DSCP) so again the LDSO would know of any wider connections at the site.

The ISG Member suggested some additional wording to BSCP25 for further clarification. ELEXON agreed that the suggestions made were sensible and as such made amendments to the draft CP form and draft redlined text for BSCP25 to reflect these changes, before these were issued for Impact Assessment.

The ISG Member also questioned whether there are any subsequent impacts on BSCP75 'Registration of Meter Aggregation Rules for Volume Allocation Units'. ELEXON advised that no impacts have been identified.

There were no comments from SVG Members on CP1403.

6. Industry Views

ELEXON issued CP1403 for CP Impact Assessment via CPC00736. We received seven responses, of which five agreed with the change and two were neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1403 in Attachment C and on the [CP1403](#) page of the BSC Website.

Summary of responses for CP1403

Organisation	Capacity in which Organisation operates (Supplier, Licenced Distribution System Operator (LDSO) etc.)	Agree?	Impacted?
Centrica	Supplier, generator	Yes	No
EDF Energy	Supplier, Meter Operator Agent (MOA), Non Half Hourly (NHH) Data Collector (DC) and NHH Data Aggregator (DA)	Neutral	No
Electricity North West	LDSO	Yes	No
National Grid	Transmission Company	Yes	Yes
RWE Npower	Supplier and Supplier Agents (Half Hourly (HH) & NHH)	Neutral	No
ScottishPower	Supplier, Distributor, generator, Supplier Agents	Yes	No
TMA Data Management Ltd	HHDC, HHDA, NHHDC and NHHDC	Yes	No

There is an impact on one respondent to the consultation (National Grid), as described in Section 3. No other respondents are impacted by CP1403.



Respondents agree that the change will be beneficial in assessing the impact of any site changes if more information is provided, and that it makes sense to enforce a more rigorous approach in order that such Trading Disputes do not occur in the future.

Comments on the proposed redlining

We received nine comments from three respondents on the redlined text as shown in the table below. ELEXON's recommended changes to the redlined text have been highlighted in yellow in Attachments A and B respectively.

Redline Comments			
Organisation	Document Name and Location	Comment	ELEXON's Recommendation
Electricity North West	BSCP15 3.1.1	I would have thought that boundary point locations and metering point (CTs) locations would be sufficient information in relation to the registration of a BMU. Is exact CT and VT ratios necessary detail for this process?	ELEXON currently asks for this information outside of the BSCP and have picked up discrepancies, which it would like to be included as a formal request. ELEXON recommends adding to the step that if this information is not available when the BSCP15/4.1 form is submitted, it should be forwarded separately by 16WDs prior to the energisation date (this is consistent to when it is required to be submitted on the Meter Technical Details).
	BSCP15 3.1.1	"at site" in the first paragraph may need expanding because under certain circumstances e.g. a metering dispensation, a directly connected BMU can affect the flows at an electrically adjacent System Connection Point.	<p>ELEXON agrees with the change and recommends that the redlined text is amended as follows:</p> <p>Submit Registration of BM Unit form and single line diagram(s) showing the location of the Metering Equipment, in particular the Settlement current and voltage transformers (CTs/VTs) and CT/VT Ratios, and all existing and proposed Boundary Points and any System Connection Points at the site at or near the proposed Boundary Point(s).</p> <p>With a footnote after 'at or near' to say:</p> <p>This information is required to help ensure the energy flow(s) for the proposed Boundary Point(s) are accounted for, where necessary (e.g. under an existing Metering Dispensation for difference metering), in the Aggregation Rules of any</p>



Redline Comments			
Organisation	Document Name and Location	Comment	ELEXON's Recommendation
			associated Volume Allocation Units (e.g. Interconnectors, other relevant BM Units, Grid Supply Point, GSP Groups or Distribution System Connection Points).
	BSCP15 3.1.10	Add item 3 that CDCA have considered, in consultation with the LDSO as necessary, the impact on Aggregation rules at electrically adjacent System Connection Points.	This suggestion reflects the requirement in BSC Section R3.4.2(b). However ELEXON believes that it would be more appropriate to add this to BSCP75, which details the need for the CDCA to validate the Aggregation Rules. BSCP15 3.1.10 currently requires the Aggregation Rules to have been registered in accordance with BSCP75 so this would work. At this point no further changes are proposed to BSCP75 but a CP could be raised in the future to rectify this.
	BSCP15 4.1	Similar to 3.1.1 above, is exact CT and VT ratio required? Possible just metering location.	As above.
	BSCP15 4.1	Under Fuel Type... Possibly consider splitting Wind into Onshore and Offshore.	ELEXON agrees that this change is sensible and recommends the redlined text is changed to reflect this.
National Grid	BSCP15 - 4.1	In addition to the proposed modifications, we request an additional data field to the BSCP15/4.1 form. This would be a new field under Fuel Type and amendment to the existing Wind (including Offshore) field to distinguish between Wind (Offshore) and Wind (Onshore).	ELEXON agrees that this change is sensible and recommends the redlined text is changed to reflect this.
	BSCP25/5.1 and BSCP25/5.3	<p>Will an application for Metering Dispensation be required? Yes / No*</p> <p>If the Systems Connection Point Metering System is not located at the Systems Connection Point and no application for Metering Dispensation is required, please indicate why not:</p> <p>Please remove this. Although NG</p>	ELEXON agrees that this change is sensible and recommends that the redlined text is amended to reflect this.



Redline Comments			
Organisation	Document Name and Location	Comment	ELEXON's Recommendation
		will provide information to ELEXON on meter location, ownership boundary and the distance between the two, the decision to apply for a dispensation lies entirely between the LDSO/meter registrant and ELEXON. NG has no involvement in dispensation applications.	
	BSCP25/5.1 and BSCP25/5.3	<p>'Tick to confirm that a single line diagram(s) showing the location of the Boundary Points and any Systems Connection Points and all existing and proposed Boundary Points and any Systems Connection Point Metering Systems at the site is attached to the application.'</p> <p>Diagrams with this level of detail are not always readily available, although NG will endeavour to provide the required information where possible. Therefore suggested rewording to the effect of:</p> <p>'Tick to confirm if a single line diagram(s), showing the location of the Boundary Points and any Systems Connection Points and all existing and proposed Boundary Points and any Systems Connection Point Metering Systems at the site, is attached to the application.'</p>	<p>ELEXON recommends changing this as suggested but with the following additional text afterwards:</p> <p>"if such diagrams are not readily available, please indicate how the proposed Boundary point or Systems Connection Point connects to the wider Transmission System and / or explain why this is not available and provide contact details for someone who would be able to provide this information."</p> <p>ELEXON believes that changing this to an "if" without the above would be inappropriate. The purpose of this CP is to ensure that all information about Boundary Points and System Connection Points that are or are proposed to be at a site is clear to ensure that the Aggregation Rules take all Volume Allocation Units into account.</p>
ScottishPower	BSCP15 3.1.1	Redlined Medium indicates Fax/Post/e-mail. Is it still appropriate to use fax as a medium, if not then references to fax should be removed throughout the BSCP.	Fax is still a valid communications medium under BSC Section H9.2, though it is not widely used these days. A Modification Proposal would be required to remove this communication medium from the BSC and Code Subsidiary Documents.

7. Recommendations

Assessment review

The proposed changes to BSCP15 and BSCP25 will provide more information to the CRA and ELEXON for new connections to the Transmission System or any Distribution Systems. This change should reduce the risk of issues occurring that may require resolution via a Trading Dispute.

No respondents to the CP Impact Assessment disagree with the CP or its proposed Implementation Date.

As this CP requires updates to BSCP15, for which the SVG and ISG have joint responsibility, we will also take this change to the ISG for approval at its meeting on 25 February 2014. We will update the SVG verbally on the ISG's discussions and decision.

Recommendations

ELEXON invites the SVG to:

- a) **AGREE** with the proposed amendments to BSCP15 and BSCP25 as set out in Attachments A and B (including the changes made following the CP Impact Assessment); and
- b) **APPROVE** CP1403 for implementation on 26 June 2014 as part of the June 2014 BSC Systems Release.

Appendices:

None

Attachments:

Attachment A – BSCP15 redlining v0.2

Attachment B – BSCP25 redlining v0.3

Attachment C – CP1403 consultation responses

For more information, please contact:

Claire Anthony

Change Analyst, Transformation Delivery

claire.anthony@elexon.co.uk

020 7380 4293