



# CP Report – CP1406

**Meeting Name** Supplier Volume Allocation Group

**Meeting Date** 1 April 2014

**Purpose of paper** For Decision

**Summary** This report provides details of the background, solution, impacts and industry views of Change Proposal (CP) 1406 'Electronic version of the Self Assessment Document'. ELEXON invites the SVG to consider the report and to reach a decision on whether to approve CP1406 for implementation in the June 2014 Release.

## 1. Why Change

### Background

The current Self Assessment Document (SAD), found in Appendix 1 to BSC Procedure (BSCP) [537](#) 'Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators', is a large Word-based document. New entrants or Qualified Persons, going through Qualification or re-Qualification respectively, must complete this.

### What is the issue?

Having a large continuous document makes it difficult for the Applicant to both complete and submit the SAD in separate sections. Currently, the Applicant separates the Word document into different sections whilst trying to maintain the formatting. In addition, it has to attach supporting evidence separately.

ELEXON raised CP1406 'Electronic version of the Self Assessment Document' on 31 January 2014 to address this issue.

## 2. Solution

In addition to the current SAD submission process of submitting a Word document, this CP proposes to have an alternative electronic version of the SAD available to complete via an online portal.

KPMG, as the current Auditor and Qualification Service Provider (QSP)<sup>1</sup>, will host the electronic SAD using its 'ELEXON Navigator' tool, which will be hosted on KPMG's servers. This is an online tool which features an online version of the SAD.

<sup>1</sup> <http://www.elexon.co.uk/wp-content/uploads/2013/11/Qualification-Approach-Document-for-year-ending-30-September-2014.pdf>

This CP will require amendments to BSCP537 to include the additional alternative option to complete and submit the SAD either electronically or via the Word document.

Having the option for the SAD to be completed electronically as well as through the current Word version would be helpful for the Applicants, ELEXON and the QSP.

Introducing an optional electronic format of the SAD will be more user friendly for Applicants, as it will allow them to submit separate SAD sections and to attach supporting evidence more easily. This will also reduce the amount of time spent on the application as each section will be on a separate webpage containing the relevant questions. The electronic version of the SAD will also enable ELEXON to manage queries from Parties during the Qualification process itself, including the ability for ELEXON to log on and support those currently in the process. As is the current process, Applicants will still be reminded regularly at the beginning of the Qualification process that they will need to send the SAD and other data directly to KPMG as the QSP, rather than to ELEXON.

The electronic SAD will provide ELEXON with one central location where all SADs for different Applicants can be stored electronically. This will provide ELEXON with easier and faster access to all submitted SADs. It will also subsequently provide better version control during the review cycle, as the tool will provide better tracking options of when the SAD sections are submitted. In turn, this will improve the efficiency of the Qualification process by giving the QSP an earlier opportunity to review submitted SAD sections. The one central location will also make it easier to locate and search for information within the SADs, and allow for key items of data to be indexed e.g. company name, system used, name of third party consultant used etc.

It should be noted that the Navigator is currently ready to use but will not be switched on until the amendments to BSCP537 have been made.

### 3. Impacts and Costs

#### Central impacts and costs

CP1406 will require a minor update to BSCP537, with no central system impacts as the tool is already in place.

ELEXON estimated costs and potential impacts		
Document Changes	System Changes/Impacts	Total Costs
BSCP537	No system changes or impacts identified	1 man day equating to £240

#### Participant impacts and costs

Six of the 12 respondents to the CP Impact Assessment indicated an impact, but only to the extent that a new option is available. Two of these respondents also advised that they would only be impacted should they submit a re-Qualification application.

Only two of the twelve respondents indicated that there may be associated costs with CP1406, although they indicated that these are negligible.

## 4. Implementation Approach

CP1406 is targeted for implementation on 26 June 2014 as part of the June 2014 BSC Systems Release.

Four of the 12 respondents commented on the implementation approach, indicating that they had a neutral view on the proposed Implementation Date as CP1406 would not impact them. One of these respondents commented that they would prefer to have a chance to test both methods in 2014, but noted that the electronic version is only an alternative option.

## 5. Industry Views

ELEXON issued CP1406 for CP Impact Assessment via CPC00737. We received 12 responses, of which 11 agreed with the CP and one was neutral.

The following table shows the breakdown of responses. You can find the full collated participant responses to CP1406 in Attachment B and on the [CP1406](#) page of the BSC Website.

### Summary of Responses for CP1406

Organisation	Capacity in which Organisation operates (Supplier, Licensed Distribution System Operator (LDSO) etc.)	Agree?	Impacted?
British Gas	Supplier	Yes	No
EDF Energy	Supplier, Half Hourly (HH) and Non Half Hourly (NHH) Meter Operator Agent (MOA), NHH Data Collector (DC) and NHH Data Aggregator (DA)	Yes	Yes
Electricity North West	Licensed Distribution System Operator (LDSO)	Yes	Yes
E.ON	Supplier, HHDC, NHHDC, HHMOA, NHHMOA, HHDA, NHHDA	Yes	Yes
Northern Powergrid Northeast and Yorkshire	LDSO	Yes	Yes
RWE Npower	Supplier, Supplier Agents (HH & NHH)	Neutral	No
ScottishPower	Supplier, Generator, LDSO, Supplier Agents	Yes	Yes
SSE Energy Supply Ltd	Supplier	Yes	No
SSEPD	LDSO	Yes	No
TMA Data Management Ltd	HHDC, NHHDC, HHDA, NHHDA	Yes	No
UK Power Networks	LDSO, Supplier Meter Registration Agent (SMRA)	Yes	Yes
Western Power Distribution	LDSO	Yes	No

All respondents agreed that introducing an alternative means of submitting the SAD will enhance the Qualification and re-Qualification processes. Respondents commented that they were supportive of the efficiencies the process may bring to Parties, as the change:

- Removes the need for the applicant to submit the relevant sections by email (either all sections at once or individually);
- Enables a direct input through the Navigator tool; and
- Gives improved access to review previous SAD submissions.

Respondents noted that the change will not benefit those Parties who choose to continue to use the current method or those that would still need an internal sign off even if they submitted online.

Two respondents highlighted the impact of accessing the SAD online on security, protection and transfer of data. ELEXON confirmed that secure access will be one of the main focuses during implementation. We highlighted that the Navigator is hosted on secure KPMG servers within the European Union. Participants who want to use the ELEXON Navigator will have to submit a 'Request for Login' form which will only grant access to the specific individuals (who will only be able to access and view their own Participant page), although KPMG as the QSP and ELEXON will have access to all Participant pages.

One respondent also questioned whether there would be a receipt acknowledgement for the electronic submission. ELEXON noted that at every point that an update or submission is made on the Navigator by a user (e.g. document upload, query raised or online SAD section submission), an alert will be sent out to notify the changes that have been made. We also noted that the final electronic submission of the SAD will need a scanned copy of the Director's signed off page of the SAD.

### Comments on the proposed redlining

No comments were received on the proposed redlined text for CP1406.

## 6. Recommendations

### Assessment review

CP1406 proposes to make changes to BSCP537 to include an additional option to complete and submit the SAD online.

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

As this CP requires updates to BSCP537, for which the SVG, Imbalance Settlement Group (ISG) and Performance Assurance Board (PAB) all have joint responsibility, we will also take this change to the ISG for

approval at its meeting on 25 March 2014 and to the PAB for endorsement at its meeting on 27 March 2014. We will update the SVG verbally on the ISG and PAB's discussions and decision.

## Recommendations

ELEXON invites the SVG to:

- a) **AGREE** with the proposed amendments to BSCP537 for CP1406;
- b) **APPROVE** CP1406 for implementation on 26 June 2014 as part of the June 2014 BSC Systems Release; and
- c) **NOTE** that CP1406 will also be presented to the ISG for approval at its meeting on 25 March 2014 and to the PAB for endorsement at its meeting on 27 March 2014.

## Appendices

None

## Attachments:

Attachment A – BSCP537 Redlining v0.1

Attachment B – CP1406 Consultation Responses

## For more information, please contact:

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