

CP Assessment Report

CP1421 'Linking BSCP520 obligations to the Operational Information Document'

ELEXON



Committee

Supplier Volume Allocation Group

Recommendation

Approve

Implementation Date

26 February 2015
(February 2015 Release)



Any questions?

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1421 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 2 December 2014. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1421.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachment A contains the proposed redlined changes to deliver the CP1421 solution.
- Attachment B contains the full responses received to the CP Consultation.

1 Why Change?

Background

The SVG identified a potential risk to Unmetered Supplies (UMS) Settlement accuracy, resulting from the interaction between the Balancing and Settlement Code's (BSC) Charge Code process and the [Electricity \(Unmetered Supplies\) Regulations 2001](#) (Statutory Instrument 2001/3263, 'the SI') which, as secondary legislation under the Electricity Act, take precedence over the BSC. A risk arises if one or more Unmetered Supplies Operators (UMSOs) agree a UMS connection without the SVG having oversight of the Charge Code, which estimates the equipment's consumption for Settlement.

The SVG identified four potential changes to the [Operational Information Document \(OID\)](#) and BSC Procedure (BSCP) [520 'Unmetered Supplies Registered in SMRS'](#) which were considered at the February 2014 Unmetered Supplies User Group (UMSUG) meeting ([UMSUG111/07](#)). One of these changes involved reviewing the balance of the requirements in BSCP520 and the OID. The OID was originally part of BSCP520 but was removed and made into a guidance document so it would be easier to change. However, as guidance, the content of the OID is not enforceable.

What is the issue?

At the February UMSUG meeting, ELEXON questioned whether the balance of BSCP520 requirements and OID guidance was appropriate or if it could be strengthened by moving some or all of the OID content back into the BSCP. For example, the current OID wording about using 'local' Miscellaneous Charge Codes only has the status of guidance rather than a BSC requirement, which leaves it open to interpretation. The UMSUG therefore agreed that a subset of UMSUG Members should review what OID content should be moved to BSCP520 and what should remain as guidance.

While initially envisaged as a 'quick win', these discussions identified potential issues with moving OID content back into the BSCP. The sub-group agreed that it was not efficient to duplicate the information in two places and that the two documents are aimed at different audiences. For example, guidance on testing requirements for manufacturers should stay in the OID as they would not look for this in the BSCP. Similarly, the BSCP cannot place obligations on manufacturers as they are not BSC Parties.

Following the UMSUG sub-group's discussion, and further discussion at the UMSUG meeting in August 2014 ([UMSUG112/03](#)), the UMSUG recommends that the existing wording of section 1.2 of BSCP520 is amended to:

- include key areas of responsibility on which the BSCP is currently silent; and
- link the BSCP obligations more strongly to the OID.

This section of the BSCP already sets out the responsibilities for UMSOs, Suppliers, Non Half Hourly Data Collectors (NHHDCs) and Meter Administrators (MAs).

Proposed solution

CP1421 '[Linking BSCP520 obligations to the Operational Information Document](#)' proposes to amend section 1.2.5 of BSCP520 to provide sufficient 'hooks' to the OID in a way that:

- strengthens the BSCP requirement in areas where it is currently silent (e.g. on testing requirements and the intention of 'local' versus 'national' Charge Codes);
- recognises that the BSCP cannot place obligations on non-BSC Parties such as manufacturers;
- avoids duplication between the two documents and retains an appropriate split between requirements and guidance;
- retains the ability to update the OID more flexibly than the BSCP, and at the same time avoids the need for constant OID updates¹; and
- avoids any conflict with UMSOs' ability to provide UMS connections under the SI.

The OID guidance will be unchanged by this CP, and will continue to be updated periodically as recommended by the UMSUG and approved by the SVG.²

Proposer's rationale

The proposed changes have been reviewed by the UMSUG, who has recommended that this CP be raised.

Proposed redlining

The proposed changes to BSCP520 to deliver CP1421 can be found in Attachment A.

¹ I.e. it allows ELEXON and the UMSUG to continue to 'batch up' OID changes for periodic SVG approval. A BSCP requirement for ELEXON to use only those Charge Code conventions set out in the OID could require monthly updates to this document due to advances in technology and equipment.

² The OID changes contained in separate paper SVG166/05 are unrelated to CP1421 and represent the latest batch of operational changes agreed by the UMSUG.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1421 will require updates to BSCP520 to implement the proposed solution. No system changes will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP520	<ul style="list-style-type: none"><i>None</i>

Central costs

The central implementation costs for CP1421 will be approximately £240 (1 man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

CP1421 is not expected to impact BSC Parties or Party Agents as this is a consequential update to BSCP520 in response to changes recommended by the UMSUG.

All respondents to the CP Consultation indicated that they would not be impacted by CP1421, and therefore there would be no associated costs to implement the changes.

4 Implementation Approach

Recommended Implementation Date

CP1421 is proposed for implementation on **26 February 2015** as part of the February 2015 BSC Systems Release, as this is the next available Release.

Respondents to the CP Consultation unanimously agreed with the proposed Implementation Date.

5 Initial Committee Views

SVG's initial views

The SVG considered CP1421 at its meeting on 30 September 2014 ([SVG164/06](#)). It had no initial comments on the proposed changes. However, it noted that its approval to hold an UMSUG meeting on 11 November 2014 would allow the UMSUG to consider any comments from the industry responses before the SVG reconsidered the CP for decision at its meeting on 2 December 2014. Subsequently, the UMSUG had no further comments to make on the CP at its meeting on 11 November 2014.

6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment B.

Summary of CP1421 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1421 proposed solution?	7	0	0	0
Do you agree that the draft redlining delivers the intent of CP1421?	7	0	0	0
Will CP1421 impact your organisation?	0	7	0	0
Will your organisation incur any costs in implementing CP1421?	0	7	0	0
Do you agree with the proposed implementation approach for CP1421?	7	0	0	0
Do you have any further comments on CP1421?	1	6	0	0

Comments on the CP

Respondents to the CP Consultation unanimously agreed with the proposed changes as they believed that the changes will strengthen BSCP520 and provide greater clarification for UMSOs.

Only one additional comment was received. The respondent believed that while the changes are proposed to help minimise risk and ensure equipment is appropriate to be unmetered, they did not think that this would have the desired effect. They commented that the changes merely direct customers to apply for Charge Codes through ELEXON and do not stipulate what course of action should be taken should the application be rejected. They also highlighted that as the SI is secondary legislation under the Electricity Act, the scope for UMS connections to be allowed has not changed nor can be changed as part of BSCP520. The respondent also commented that this CP cannot address the scenario where multiple UMSOs have agreed to supply an unmetered connection but the SVG has refused an application for a national Charge Code.

ELEXON confirmed that the intent of this CP is to strengthen the links between the BSCP and the OID in a way that does not conflict with the SI. It can therefore only clarify the intention of 'local' versus 'national' Charge Codes and obligate ELEXON to process applications for national Charge Codes where it receives these. ELEXON recognises that the SI takes precedence over the BSC, hence neither changes to the BSC nor its subsidiary documents can prevent UMSOs from granting unmetered connections where they consider that equipment meets the criteria in the SI.

Comments on the proposed redlining

No comments were received on the proposed redlined text for CP1421.

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7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to BSCP520 for CP1421; and
- **APPROVE** CP1421 for implementation on 26 February 2015 as part of the February 2015 Release.

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Appendix 1: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BSC	Balancing and Settlement Code (<i>document</i>)
BSCP	Balancing and Settlement Code Procedure (<i>document</i>)
CP	Change Proposal
DC	Data Collector (<i>Party Agent</i>)
LDSO	Licensed Distribution System Operators
MA	Meter Administrator (<i>Party Agent</i>)
NHH	Non Half Hourly
OID	Operational Information Document (<i>document</i>)
SI	Statutory Instrument (<i>document</i>)
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
UMS	Unmetered Supplies
UMSO	Unmetered Supplies Operator
UMSUG	Unmetered Supplies User Group (<i>Panel Sub-Group</i>)

External links

A summary of all hyperlinks used in this document are listed in the table below. All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	Electricity (Unmetered Supplies) Regulations 2001 page on Government website	http://www.legislation.gov.uk/ukxi/2001/3263/regulation/3/made
2	Charge Codes and Switch Regimes page on the ELEXON website (OID)	http://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/charge-codes-and-switch-regimes/
2	BSCPs page on the ELEXON website (BSCP520)	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	UMSUG111 page on the ELEXON website	http://www.elexon.co.uk/meeting/umsug-111-2/
2	UMSUG112 page on the ELEXON website	http://www.elexon.co.uk/meeting/umsug-112/
3	CP1421 page on the ELEXON website	http://www.elexon.co.uk/change-proposal/cp1421/

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