CP Assessment Report

CP1423 'Amendments to BSCP68 following a review'

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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1423 which ELEXON will present to the Imbalance Settlement Group (ISG) at its meeting on 27 January 2015, and the Supplier Volume Allocation Group (SVG) on 3 February 2015. The ISG and SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1423.

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 ISG and 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 CP1423 solution.
- Attachment B contains the full responses received to the CP Consultation.

Committee

Imbalance Settlement Group

Recommendation

Approve

Implementation Date

26 June 2015 (June 2015 Release)

Any questions?

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1 Why Change?

Background

BSCP68 'Transfer of Registration of Metering Systems Between CMRS and SMRS' covers the processes required to transfer a Metering System between the Central Meter Registration Service (CMRS) and the Supplier Meter Registration Service (SMRS) or vice versa. When such a transfer occurs, it is important that checks are carried out to ensure that Third Party Generating Plant is accounted for in either Central Volume Allocation (CVA) or Supplier Volume Allocation (SVA), but not in both.

These processes are not invoked very often, and recent use has highlighted some issues with the processes. As BSCP68 has not been updated since 2009, we have taken this opportunity to review these processes and take care of some outstanding housekeeping changes.

What is the issue?

Some of the processes described in BSCP68 are referenced in other BSCPs. In some of these instances, the advice given by BSCP68 differs from other documents:

- In Sections 3.1.1.12 and 3.1.2.17, the timescales for registering Line Loss Factors (LLFs) are different to those in BSCP128 'Production, Submission, Audit and Approval of Line Loss Factors'. BSCP68 has not been reviewed since BSCP128 was created, and so has become out of date. Aligning BSCP68 with BSCP128 will require consequential changes to other timescales and requirements in BSCP68 to ensure process steps and cross-references are consistent and chronologically correct.

- The advice on how notice of successful registration is given by the transfer coordinator differs between BSCP68 Sections 3.1.1.37 and 3.1.2.42, and BSCP515 'Licensed Distribution' Section 3.7. Both of these procedures are correct, but in this scenario there is no need for the Supplier to submit a D0132 'Request for Disconnection of Supply' data flow as instructed by BSCP515; the steps given by BSCP68 are sufficient.

- The steps concerning the transfer of Grid Supply Point (GSP) Group Take Aggregation Rules in Sections 3.1.1 and 3.1.2 are also needlessly duplicated. This may not only cause confusion, but also makes the process less efficient and increases the chance of an error. Removal of these steps will result in the need to renumber the subsequent steps and update the rest of the document to correct any other references made to these steps.

- Finally, in Section 3.1.2, step 3.1.2.45 was removed by P197 'SVA Qualification Processes Review'. However, references from elsewhere in the BSCP to this step and others in section 3.1.2 have not been updated correctly, so we will take this opportunity to make these amendments.

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2 Solution

Proposed solution

CP1423 'Amendments to BSCP68 following a review' was raised by ELEXON to progress the changes identified by our review.

We propose to:

- Align BSCP68 Sections 3.1.1.12 and 3.1.2.17 with BSCP128 so that they state a 50 Working Day (WD) lead time for LLF registration as opposed to the current 25WD. As a consequence steps which precede these in practice will be changed to state a 55WD lead time. These steps will then be moved to earlier within their respective sections, so that the processes outlined in BSCP68 remain in chronological order. This will result in the need to adjust the numbering of some steps and the amendment of cross-references, particularly the checklists in Appendix 4.8;
- Add a footnote to BSCP68 in the current Sections 3.1.1.37 and 3.1.2.42, stating that these procedures replace the need to send a D0132 flow under BSCP515;
- Remove duplicated steps from 3.1.1 and 3.1.2. After removing these steps, the remaining steps will be renumbered accordingly, and any references will be amended to match; and
- Make other housekeeping changes to correct minor drafting errors in BSCP68.

Proposer's rationale

The proposed changes will bring BSCP68, which has not been reviewed since 2009, up to date and ensure that all BSCPs are consistent and correct in the advice they give on various procedures. The overall effect of the CP will be to avoid confusion, and make the procedures described in this BSCP more efficient and less susceptible to error.

Proposed redlining

The proposed redlining to BSCP68 to deliver CP1423 can be found in Attachment A.

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3 Impacts and Costs

Central impacts and costs

Central impacts

CP1423 will require updates to BSCP68 only. There are no anticipated system impacts.

Central Impacts	
Document Impacts	System Impacts
• BSCP68	• *None*

Central costs

The central implementation costs for CP1423 will be approximately £240 (one ELEXON man day) to implement the necessary document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

None of the seven responses to the industry consultation identified any BSC Party or Party Agent impacts or costs associated with implementing CP1423.

4 Implementation Approach

Recommended Implementation Date

The recommended Implementation Date for CP1423 is **26 June 2015** as part of the June 2015 Release, as this is the next release this CP can be included in. The total effort for implementing CP1423 is one man day for ELEXON to implement the necessary document changes. All consultation responses agreed with this proposed approach.

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5 Initial Committee Views

ISG's initial views

The ISG considered CP1423 at its meeting on 25 November 2014 (ISG163/02).

The ISG was generally supportive of the changes, though Members did raise a few concerns that they felt should be highlighted for the industry consultation.

It was noted that the proposed increase in lead time for submitting LLFs was a significant difference, and if this step is on the critical path then it could have impacts on Parties wishing to perform the registration transfer. The need for such a large lead time was questioned, as it was felt that the LLF values for any site being transferred into CVA should be the same as when it was registered under SVA, and so no calculations would need to be performed. The general feel was that, although this change reflects advice given in BSCP128, this was not a move in the right direction.

There was discussion over whether BSCP128 gave 40WD or 50WD as the lead time for registering LLFs. This would depend on whether the transferred site would be regarded as a new or existing site for the new registration.

We can confirm that the proposed lead time of 50WD is correct as when a transfer occurs from SVA to CVA, the site is assigned a new Metering System Identifier (MSID), and is treated as a new CVA site under BSCP128 for the purposes of registering CVA LLFs.

One ISG Member questioned whether the advice given in BSCP515 was relevant to the procedure described by BSCP68 Sections 3.1.2.37 and 3.1.2.42. They believed that BSCP68 did not apply when the registration change involved switching between the Transmission Network and Distribution Networks. This was clarified in the proposed footnote.

SVG's initial views

The SVG considered CP1423 at its meeting on 2 December 2014 (SVG166/08).

The SVG agreed that inconsistencies between BSCPs should be removed. However some Members queried why a process is required to move Meters from the SMRS to the CMRS, or vice versa, and under what scenarios it is used. A Member commented that they were unsure whether this process, and therefore BSCP68, was still required. Another SVG Member suggested that a Power Station increasing its capacity could need to move from SVA to CVA. ELEXON noted that the process was used, though perhaps infrequently. The SVG asked ELEXON to look at the last few examples and to include a question in the CP Consultation. ELEXON noted that CP1423 is simply seeking to remove inconsistencies between BSCP68 and other documents. However, it agreed to ask the consultation question and to provide further information on the purpose of the BSCP.

ELEXON investigated the SVG's comments about the relevance of BSCP68 and noted that BSC Section K2.1.2 states that:

> 'Without prejudice to paragraph 2.1.1, a Boundary Point Metering System may be registered in CMRS where the Metering Equipment measures quantities of Exports, or Exports and Imports, at the Site of an Exemptible Generating Plant'.

This means that customers can choose whether to register a Licence Exemptible Generating Plant connected to a Distribution System in CMRS or SMRS. This also

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consequently means that customers can choose to switch the registration of this type of site between CMRS and SMRS.

This process is not used very often; it has been used twice in the last 18 months. However we are aware of up to 10 sites that may go through this process in the next year. There are two main reasons why a site may need to move between CMRS and SMRS:

- **Change of agreement with National Grid:** A site over a certain size must have a Bilateral Embedded Licence Exemptable Large Agreement (BELLA) or Bilateral Embedded Generation Agreement (BEGA) with National Grid. Sites with a BELLA tend to be registered in SVA but sites with a BEGA must be registered in CVA. Therefore if a site changes from a BELLA to a BEGA with National Grid or from no agreement to a BEGA (e.g. due to a change in size) this could mean that the site has to move from SVA to CVA.

- **Change of Registrant:** A site registered in SVA may be taken on by a registrant who is a BSC Trading Party but not a Supplier. In this case the new Registrant would either need to go through the Market Entry Process and become a Supplier to allow the site to remain in SVA or move the site into CVA.

When carrying out a registration transfer it is important that the deregistration in one system is co-ordinated with the registration in the other system to prevent the site being registered in both systems at the same time, or in neither system. BSCP68 sets out the process to do this in a co-ordinated manner. The Registrant's agents in one registration system are completely different to those in the other system and where there is a co-incident change of Registrant, the only parties that remain constant throughout the process are the Licenced Distribution System Operator (LDSO) and the Transfer Co-ordinator (ELEXON). BSCP68 is therefore needed to ensure that we have a clear process, co-ordinated centrally for a smooth transition with no Settlement Errors.

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6 Industry Views

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

Summary of CP1423 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1423 proposed solution?	6	1	0	0
Do you agree that the draft redlining delivers the intent of CP1423?	6	1	0	0
Will CP1423 impact your organisation?	0	7	0	0
Will your organisation incur any costs in implementing CP1423?	0	7	0	0
Do you agree with the proposed implementation approach for CP1423?	7	0	0	0
Do you believe that BSCP68 is no longer a relevant document?	2	4	1	0
Do you have any further comments on CP1423?	0	7	0	0

Comments on the proposed redlining

No respondents provided specific comments on the proposed redlining for CP1423.

Comments on CP1423

Six of the industry respondents agreed with the proposed solution and thought that the draft redlining achieved this solution, agreeing that the aligning of BSCPs would improve the clarity for market participants. One respondent disagreed with the solution to CP1423, stating that increase in lead time would not improve the efficiency of carrying out the transfer between CMRS and SMRS.

ELEXON notes that CP1423 does not seek to increase the lead times involved in this transfer process, as the related document, BSCP128, already states 50WD for the registration of LLFs. CP1423 simply seeks to align all documents to the current process in order to avoid confusion, and ELEXON notes that 50WD is in fact the appropriate lead time for registering LLFs in this transfer for the reasons given in Section 5.

Comments on the relevance of BSCP68

Two of the seven respondents agreed with some SVG Members that BSCP68 is no longer a relevant document and should be retired. Their reasoning for this is that they could not think of any situations in which the processes described in BSCP68 would ever be invoked. Four respondents thought that BSCP68 should not be retired, giving the reason that although it is very rarely used, it should remain in place to offer guidance in case such a transfer was attempted. One respondent remained impartial on the matter.

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7 Recommendations

We invite you to:

- **AGREE** the proposed redlining for BSCP68 deliver the solution for CP1423;
- **APPROVE** the proposed changes to BSCP68 for CP1423;
- **APPROVE** CP1423 for implementation on **26 June 2015** as part of the June 2015 Release; and
- **NOTE** that CP1423 will also be presented to the SVG on 3 February 2015.

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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
BEGA	Bilateral Embedded Generation Agreement
BELLA	Bilateral Embedded Licence Exemptable Large Agreement
BSCP	BSC Procedure
CMRS	Central Meter Registration Service
CP	Change Proposal
CVA	Central Volume Allocation
GSP	Grid Supply Point
LDSO	Licenced Distribution System Operator
LLF	Line Loss Factor
ISG	Imbalance Settlement Group *(Panel Committee)*
MSID	Metering System Identifier
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group *(Panel Committee)*
WD	Working Day

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0132	Request for Disconnection of Supply

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	BSCPs page on the ELEXON website (for BSCP68, BSCP128 and BSCP515)	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/

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External Links		
Page (s)	Description	URL
2	D0132 data flow in the Data Transfer Catalogue	http://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0132&FlowVers=1&searchMockFlows=False
2	P197 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p197-sva-qualification-processes-review/
3	CP1423 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1423/
5	ISG163 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-163/
5	SVG166 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-166/

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