

CP1461 'Amending BSCP128 to reflect a new simple SVA file format for LDSO LLF submissions'

ELEXON



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About This Document

This document is the CP1461 Final Change Proposal (CP) Report which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG) and the Supplier Volume Allocation Group (SVG) to approve CP1461.

There are four 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 the SVG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachments A and B contains the approved redlined changes to deliver the CP1461 solution.
- Attachment C contains the full responses received to the CP Consultation.

CP1461
Final CP Report

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How do Embedded DSOs submit Mirrored LLFs?

Distribution System Operators (DSOs) are required to submit Line Loss Factors (LLFs) each year in accordance with [Balancing and Settlement Code Procedure \(BSCP\) 128 'Production, Submission, Audit and Approval of Line Loss Factors'](#). These LLFs are submitted by the DSO to ELEXON via a [D0265 'Line Loss Factor Data File'](#) data flow, and are received by the Half Hourly Data Aggregator (HHDA), Supplier and Supplier Volume Allocation Agent (SVAA). This flow contains a value for every Settlement Period for every Settlement Day (17,520 values) per LLF Class (LLFC).

Where an Embedded DSO intends to Mirror the relevant Host DSO's LLFs, it must create a D0265 Data Flow by repeating the data the Host DSO has already sent to ELEXON. These files can, in theory, contain over 17 million rows of data. To generate this D0265 data file, Embedded DSOs can either invest in software or systems to automate the generation of the file or rely on a manual process, prone to human error, to copy the Host DSO's LLFs.

Since 2010 ELEXON has operated a spreadsheet-based application that can create D0265 flows on behalf of Embedded DSOs. This allows Embedded DSOs that Mirror the host DSO's LLFs to submit an XLS Excel file (a Supplier Volume Allocation (SVA) Short Format file) to ELEXON which prompts the creation of a D0265 on behalf of the Embedded DSO. This reduces the complexity in the process and reduces the risk of errors. This application has operated successfully since 2010 but is not formally recognised in BSCP128 or any other BSC Code Subsidiary Document (CSD).

What is the issue?

The simple file format approach developed by ELEXON is used by all Embedded DSOs that Mirror their Host DSO's LLFs. Therefore, in order to provide industry transparency and ensure that this process is the subject of formal change governance, we believe it should be formalised within BSCP128 so that the documentation reflects the current operational processes.

What is a SVA Line Loss Factor?

SVA LLFs are used in aggregation by the HHDA for Half Hourly (HH) Metering Systems and the SVAA for Non Half Hourly (NHH) Metering Systems. These values are applied in order to account for losses on the Distribution System. SVA Metering Systems are banded together into LLFCs and all Metering Systems in a particular LLFC will have the same LLF values.

For further information, please see the [Losses](#) page of the BSC website.

Approved solution

[CP1461 'Amending BSCP128 to reflect a new simple SVA file format for LDSO LLF submissions'](#) was raised by ELEXON on 5 May 2016. It will amend BSCP128 to formally include the D0265 file generation process currently provided by ELEXON to Embedded DSOs.

Although the D0265 file generation process has been operational since 2010, CP1461 will formally describe the process by making clear in BSCP128 that:

1. should they wish to, Embedded DSOs can send an SVA Short Format file to ELEXON to request that ELEXON generate a D0265 on the DSO's behalf; and
2. ELEXON must then generate a D0265 on behalf of the Embedded DSO.

Embedded DSOs that Mirror the Host DSO's LLFs will continue to have two options for submitting their SVA LLFs:

1. it can generate its own D0265 data files; or
2. it can submit a SVA Short Format Excel file to ELEXON and have ELEXON create and submit the D0265 data file on its behalf.

Proposer's rationale

BSCP128 does not currently reflect the current operational process. Updating the documentation will ensure transparency, certainty, and confidence that the process will be subject to formal BSC change governance.

Approved redlining

Attachments B and C contain the approved changes to BSCP128 and BSCP128 Appendix 7 'SVA Format data file (D0265)' to deliver CP1461.

3 Impacts and Costs

Central impacts and costs

CP1461 will require changes to BSCP128 and BSCP128 Appendix 7. No system changes are required to implement this CP and there will be no other impacts on BSC Agents.

The central costs to deliver CP1461 will be approximately £240 (one ELEXON man day) to implement the document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP128BSCP128 Appendix 7	<i>None</i>

BSC Party & Party Agent impacts and costs

All six respondents (five DSOs and one Supplier) to the CP Consultation indicated that they would not be impacted by CP1461. One distributor confirmed that the CP would only impact Embedded DSOs. Another distributor indicated that the CP would not impact its organisation, as CP1461 intends to formalise existing procedures that are already undertaken by Embedded DSOs to provide LLFs.

All six respondents confirmed that there would not be any associated costs with CP1461, as the change will formalise an existing operational procedure.

4 Implementation Approach

Approved Implementation Date

CP1461 will be implemented on **3 November 2016** as part of the November 2016 BSC Systems Release.

The November 2016 Release is the next available Release that can include this CP. At its meeting on 24 May 2016 ([ISG181/05](#)), the ISG agreed that this CP should be included as part of the November 2016 Release. It was noted in the meeting that the November Implementation Date will not impact the next LLF submissions deadline. The LLF submission deadline for Embedded DSOs is mid-January 2017, and the SVA Short Format file is already used by all Embedded DSOs that Mirror the relevant Host DSO's LLFs.

At its meeting on 31 May 2016 ([SVG184/03](#)), the SVG noted the proposed Implementation Date.

All of the respondents to the CP Consultation agreed with the proposed Implementation Date of 3 November 2016.

5 Initial Committee Views

ISG's initial views

The ISG considered CP1461 at its meeting on 24 May 2016 ([ISG181/05](#)).

An ISG Member asked about the volume of applications that ELEXON receives for DSO LLF SVA file format submissions. Another Member responded that there are 14 Host DSOs, along with six Embedded DSOs that have to mimic the data.¹ The Member noted that, based on correspondence, DSOs support the changes proposed by CP1461.

An ISG Member questioned ELEXON's process in the event of an error in the Mirroring process. ELEXON informed the ISG that errors are identified during the audit and system validation processes before Mirroring takes place.

An ISG Member questioned whether ELEXON charges for the Mirroring service. ELEXON confirmed that there is no additional fee for the service. Following CP1461, the process will become a formal method under the BSC.

The ISG did not request any additional questions be asked as part of the CP Consultation.

SVG's initial views

The SVG considered CP1461 at its meeting on 31 May 2016 ([SVG184/03](#)).

The SVG had no initial comments on this CP and did not request any additional questions be asked as part of the CP Consultation.

¹ ELEXON receives six submissions from the six Embedded DSOs that Mirror the relevant Host DSOs' LLFs.

6 Industry Views

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

Summary of CP1461 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1461 proposed solution?	6	0	0	0
Do you agree that the draft redlining delivers the CP1461 proposed solution?	6	0	0	0
Will CP1461 impact your organisation?	0	6	0	0
Will your organisation incur any costs in implementing CP1461?	0	6	0	0
Do you agree with the proposed implementation approach for CP1461?	6	0	0	0
Do you have any further comments on CP1461?	2	4	0	0

Comments on the CP

All six respondents to the CP Consultation agreed with the proposed changes for CP1461. One respondent commented that the proposed solution was already in use as a standard working procedure. The change will therefore formalise the procedure into the Code to ensure consistency across Parties. Another respondent reiterated this view, indicating the solution was a housekeeping change to BSCP128.

Potential MRA Change

One respondent highlighted that the D0265 data flow's 'Notes' within the Data Transfer Catalogue (DTC) states that 'In England and Wales, this information is not provided directly to participants by Distributors but is published on the BSC Website'. The respondent queried the accuracy of the flow's notes, indicating that the ELEXON Portal publishes all DSO D0265 flow information. In light of the potential inaccuracy, the respondent suggested that ELEXON consider raising a Master Registration Agreement (MRA) DTC change to amend the flow's notes.

We can confirm that under [Section X Appendix-1 'General Glossary'](#), the BSC Website means "the websites established and maintained by BSCCo". The term 'BSC Website' was amended by [P291 'REMIT Inside Information Reporting Platform for GB Electricity'](#) to refer to many websites. The outcome of this change was the recognition that the ELEXON Portal is one of several BSC Websites.

We initially recommended that no DTC CP be raised under the MRA at this time. The flow notes correctly indicate that the D0265 information is not transferred to participants over the Data Transfer Network (DTN) by distributors, but is instead published on the BSC Website (which includes the ELEXON Portal).

However, a further issue with the D0265 flow's 'Notes' section was raised in the ISG meeting on 19 July 2016 ([ISG183/08](#)). The notes indicate that the ELEXON Portal publishes the D0265 flows in England and Wales; however this activity occurs for all of Great Britain. We agreed to raise a DTC CP to amend the wording in the D0265 flow's 'Notes' section.

Comments on the proposed redlining

All six respondents highlighted that the draft redlining delivers the proposed intent of CP1461, as set out in the CP form, and will ensure that BSCP128 and BSCP128 Appendix 7 is updated to reflect the current operational procedure.

ISG's final views

At its meeting on 19 July 2016 ([ISG183/08](#)), the ISG considered the proposed solution and the responses received to the CP Consultation before determining to approve CP1461.

An ISG Member provided further clarity on the comment made in the CP Consultation, in relation to amending the D0265 flow notes in the DTC. They highlighted that it is current operational practice for the ELEXON Portal to publish all the LDSO D0265 flows for Great Britain. However, the D0265 flow's notes suggest that this activity only occurs in England and Wales. The ISG members highlighted that this inaccuracy did not have an impact on the progression of CP1461, and suggested that ELEXON consider raising a separate DTC CP under the MRA. We committed to raising this DTC CP, which has since been raised as DTC CP 3497 'Housekeeping amendment to the D0265 Data Flow 'Notes''.

An ISG Member queried what would happen in the event that an Embedded DSO generated its own D0265 file, in addition to submitting an SVA Short Format Excel file to ELEXON to create and submit the D0265 data file on its behalf. We indicated that historically DSOs have always relied on ELEXON to create the D0265 file, as the approach reduces the complexity and effort required to generate its own D0265 file. As such, the intention of the CP is to formalise an existing process that has operated successfully since 2010. We agreed to explore the operational process in the event that two duplicate D0265 files are submitted to ELEXON.

SVG's final views

At its meeting on 2 August 2016 ([SVG186/04](#)), the SVG considered the proposed solution and the responses received to the CP Consultation before agreeing to approve CP1461.

The SVG noted that DTC CP 3497 has been raised and would be considered at the MRA Development Board on 24 August 2016. The CP proposes that the D0265 flow's 'Notes' be removed. We confirmed that the DTC CP did not have an impact on the progression of CP1461.

Final decision

The ISG and SVG have **APPROVED** CP1461 for implementation on 3 November 2016 as part of the November 2016 BSC Systems Release.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure (<i>Code Subsidiary Document</i>)
CP	Change Proposal
CPC	Change Proposal Circular
DSO	Distribution System Operator (<i>BSC Party</i>)
DTC	Data Transfer Catalogue
HHDA	Half Hourly Data Aggregator (<i>Party Agent</i>)
ISG	Imbalance Settlement Group (<i>Panel Committee</i>)
LLF	Line Loss Factor (<i>value</i>)
LLFC	Line Loss Factor Class
MRA	Master Registration Agreement
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent (<i>BSC Agent</i>)
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)

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
D0265	Line Loss Factor Data File

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, 4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	D0265 entry in the Data Transfer Catalogue	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0265&FlowVers=1&searchMockFlows=False
2	Losses page on the ELEXON website	https://www.elexon.co.uk/reference/technical-operations/losses/

External Links		
Page(s)	Description	URL
3	CP1461 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/cp1461/
5, 6	ISG181 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-181/
5, 6	SVG184 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-184/
7	BSC Sections page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
7	P291 page on the ELEXON website	https://www.elexon.co.uk/mod-proposal/p291/
8	ISG183 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-183/
8	SVG186 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-186/