

Final CP Report

CP1493 'Changes to BSCP550 – Shared Metering Arrangements'



Contact

Jemma Williams

020 7380 4359

Jemma.Williams@elexon.co.uk



Contents

1	Why Change?	2
2	Solution	3
3	Impacts and Costs	5
4	Implementation Approach	6
5	Initial Committee Views	7
6	Industry Views from First Consultation	8
7	Committee views following First Consultation	9
8	Industry Views from Second Consultation	11
9	Final Committee Views and Decision	13
	Appendix 1: Glossary & References	14
	Appendix 2: Comments on the Original Redlining	16

About This Document

This document is the Final Change Proposal Report for CP1483 which ELEXON has published following the final decision from the Supplier Volume Allocation Group (SVG) to approve CP1483.

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 views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1483 solution.
- Attachment B contains the full responses received to the second CP Consultation.

CP1483
Final CP Report

5 July 2017

Version 0.1

Page 1 of 20

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1 Why Change?

What is the current process?

The current shared metering process enables two or more Suppliers to agree an allocation schedule. This splits the Active Energy measured by the Shared Supplier Volume Allocation (SVA) Metering System for each Settlement Period between two or more Suppliers, such that the net energy allocated to the Suppliers is equal to metered Active Energy. Therefore this allocation schedule is used by the Half Hourly Data Collector (HHDC) to allocate energy to each Supplier of the single Boundary Point Metering System.

There are several options available for Suppliers to 'split' the energy allocated to a Boundary Point Metering System.¹ The key information required to do this is contained within the allocation schedule. Party Agents may only receive the allocation schedule at the end of the process (by Gate Closure) as this is the requirement within [Balancing and Settlement Code Procedure \(BSCP\) 550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy'](#).

What is the issue?

When a Meter is shared by two or more Suppliers, at the point at which Suppliers are required to appoint their Agents to a Shared SVA Metering System, it is unlikely that the Agents will be aware that the site is to be shared. This makes it difficult for the Meter Operator Agent (MOA) and the HHDC to assist Suppliers by highlighting potential issues before the Shared SVA Metering System arrangements become effective. Due to this, the current process can result in subsequent errors requiring resolution, adding complications for all parties involved, and that could have been prevented had the Supplier Agents been appointed at an earlier stage.



Boundary Point Metering System

A Metering System that measures Exports or Imports of flows of electricity at a Boundary Point (a point at which any Plant or Apparatus not forming part of the Total System is connected to the Total System).

CP1483
Final CP Report

5 July 2017

Version 0.1

Page 2 of 20

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¹ BSCP550 Appendix 4.2 describes four standard Methods for splitting of Half Hourly Active Energy.

Approved solution

[CP1483 'Changes to BSCP550 – Shared Metering Arrangements'](#) was raised by ELEXON on 18 January 2017. This CP makes it a requirement for Suppliers to inform their Agents of the allocation schedule at the time of Agent appointments and at least five Working Days (WDs) before the appointment date, rather than by Gate Closure. For clarification, this will only be for new Shared SVA Metering System arrangements, or where new Agents are appointed to existing sites. Overall, it is anticipated that these amendments will improve the efficiency of the process and reduce errors.

CP1483 will bring forward the requirement for the provision of the initial allocation schedule and supporting technical information, to the time of an Agent appointment, within the following BSCP550 processes:

- 3.1 'New connection or Transfer from CMRS (Central Meter Registration Service) to SMRS (Supplier Meter Registration Service)';
- 3.2 'Single to Shared SVA Metering System';
- 3.3 'Change of HHDC for an Existing Shared SVA Metering System'; and
- 3.4 'Change of Meter Operator Agent for an Existing Shared SVA Metering System'.

In addition, CP1483 proposes to change the obligations around how the MOA, HHDC and HH Data Aggregator (DA) confirm that the appointment details are correct and consistent. The CP will replace the existing obligation of two WDs with 'reasonable endeavours' at the time of being appointed or de-appointed to a shared metering arrangement by a Supplier (Primary or Secondary).

Using reasonable endeavours to check the appointment details are correct will help prevent subsequent errors requiring resolution. Furthermore, moving the appointment date forward allows time for this check to occur.

The obligations listed above are proposed for inclusion in BSCP550 Section 1.2, and replaces the following original process steps: 3.1.9, 3.2.1.11, 3.2.1.16, 3.2.2.9, 3.2.2.11, 3.2.3.7, 3.2.3.9, 3.2.4.14, 3.2.4.16, 3.2.5.10, 3.2.6.9, 3.2.6.11, 3.3.7, 3.3.9, 3.4.7, 3.4.9, 3.4.11 and 3.4.13.

Please note that following SVG feedback, the above change is now identified as material and moved out of the housekeeping section of the paper below.

Housekeeping changes

The proposed solution to CP1483 also recommends making the following Housekeeping Changes to correct two manifest errors identified in BSCP550:

- The change in Section 1.3 removes references to deleted diagrams.
- The change in Section 4.8 removes text enabling the HHDC to terminate its appointment without instruction from the Supplier. It is operational practice that only the Supplier can terminate the appointment of an HHDC (D0151 'Termination of Appointment or Contract by Supplier') data flow or HHDA (D0151) data flow. There is no equivalent flow between an HHDA and HHDC.



What is a Housekeeping Change?

[Balancing and Settlement Code Procedure \(BSCP\) 40 'Change Management'](#) section 2.2 defines a Housekeeping Change as: "the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text".

CP1483

Final CP Report

5 July 2017

Version 0.1

Page 3 of 20

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Proposer's rationale

ELEXON believes that the proposed solution will make it easier for the MOA and the HHDC to assist Suppliers by highlighting potential issues earlier in the appointment process for Shared SVA Metering System arrangements. This will reduce the need for retrospective issue resolution.

Approved redlining

Attachment A contains the approved redlined changes to BSCP550 to deliver the CP1483 solution.

3 Impacts and Costs

Central impacts and costs

CP1483 will require document only changes to BSCP550. No BSC Central Systems changes are required.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP550	<i>None</i>

Central costs

The central implementation costs for CP1483 will be approximately **£240** (one ELEXON man day) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

CP1483 is expected to impact Suppliers, HHDCs and HHMOAs only. Through the CP consultation, Parties identified that only minor process and system changes were required to implement the proposed solution and the costs are expected to be minimal.

No other BSC Parties or Party Agents are expected to be impacted by the proposed solution to CP1483.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	This will have a minor impact on processes and systems.
HHDCs	
HHMOAs	

CP Consultation responses

The impacts and costs of this CP were all viewed to be minimal by the seven respondents to the CP Consultation. All respondents believed there will be some impact, but that this will involve minor changes. Similarly, the four respondents that anticipate costs in implementing CP1483 believe these will only be minor.

4 Implementation Approach

Approved Implementation Date

CP1483 was approved for implementation on **22 February 2018**, as part of the February 2018 BSC Release.

All seven respondents to the first CP Consultation agreed with the implementation approach for CP1483.

In response to the second CP Consultation, one respondent suggested that the Implementation Date be pushed back from November 2017 to February 2018, to accommodate an internal impact in the creation of minor process changes.

ELEXON confirmed at the SVG meeting ([SVG197/04](#)) that the Implementation Date could be changed from November 2017 to February 2018, and would not have a material impact on Metering and Settlement. The SVG therefore agreed to amend the Implementation Date.

SVG's initial views

The CP progression paper for CP1483 was presented to the SVG at its meeting on 31 January 2017 ([SVG192/04](#)).

The SVG acknowledged the issue with the current process and a number of further points were discussed:

- Firstly, an SVG Member asked about the scale and origin of the issue. ELEXON confirmed that CP1483 originated as a concern discussed at the Performance Assurance Board (PAB) regarding Settlement Risks for new potential sites, particularly as errors occurring after Gate Closure are difficult to correct. ELEXON indicated that the scale of the issue is small as there are less than ten known shared metering arrangement sites in the UK.² However, these numbers may increase and hence it is important to rectify the issue before it becomes more prevalent.
- Secondly, an SVG Member expressed support for the proposal and noted that their company had experienced the issue identified and would be providing examples during the consultation phase in order to provide more clarity on the issue.
- Lastly, an SVG Member noted that an early Implementation Date would be preferable so that potential issues can be avoided sooner. ELEXON suggested that, given the current small materiality, there was no obvious pressing need to implement earlier. However it welcomed Parties' views on the feasibility of an earlier Implementation Date, on 29 June 2017, and the priority they would assign to this CP. The consultation found that there is little appetite for an earlier Implementation Date as only two of seven consultation respondents were open to it, while all respondents were happy for the Implementation Date to remain on 2 November 2017. As detailed in section 4, the Implementation Date was subsequently amended to 22 February 2018.

² Results of an ELEXON request for information from HHDCs in August 2016.

6 Industry Views from First Consultation

CP1483 was first issued for consultation on 6 February 2017, with a response deadline of 3 March 2017. This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1483 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1483 proposed solution?	6	1	0	0
Do you agree that the draft redlining delivers the intent of CP1483?	6	1	0	0
Will CP1483 impact your organisation?	7	0	0	0
Will your organisation incur any costs in implementing CP1483?	4	3	0	0
Do you agree with the proposed implementation approach for CP1483?	7	0	0	0

Comments on the CP

Seven responses were received to the CP Consultation of which six respondents agreed with the original solution and the draft redlining.

Please note that initially a respondent disagreed with the redlining due to concerns that CP1483 does not address wider issues concerning shared metering arrangements (see responses to Question 5 in Attachment C for details) and this view was published on 13 March 2017. ELEXON has since discussed these concerns with the respondent. Given the concerns are beyond the scope of this CP and some of the issues are not yet fully understood, the establishment of an Issue Group is being planned in order to properly consider these concerns. The respondent subsequently confirmed with ELEXON that their negative response to the redlined changes was due to the fact that the redlining did not deal with the broader issues they had identified. The respondent now agrees that the proposed redlining does deliver the proposed solution as set out in CP1483 and this is reflected in the above table.

The respondent that disagreed with the CP1483 proposed solution and the draft redlining did so on the basis that changing a requirement for the MOA, HHDC and HHDA to confirm appointment details is correct 'within two WDs' to 'best endeavours' is a backward step. ELEXON has discussed this concern with the respondent and explained that the old requirement of confirming appointment details is not practical to deliver a meaningful obligation. Additionally, the proposed changes give the MOA, HHDC and HHDA more flexibility to deal with issues as and when they arise. The same respondent disagreed that greater flexibility is beneficial and concluded that they maintained their original view.

Please note that specific comments and ELEXON's responses on the original redlining are included in Appendix 2.

SVG's views on the first Consultation

The SVG considered the responses received to the first CP Consultation on 4 April 2017 ([SVG194/03](#)).

Issue Group

At the April SVG meeting, an SVG Member asked how the proposed Issue Group will work. ELEXON noted that the respondent is a Party Agent and therefore it is not able to raise the Issue itself. One option would be for ELEXON to raise the Issue on their behalf, or alternatively an SVG member could do so. ELEXON agreed to liaise with the Party Agent to work on this Issue.

Another SVG Member noted that this Issue is regarding less than ten metering points and it might therefore be difficult to find participants interested in joining the Issue Group. Moreover, another SVG Member noted that the materiality of errors caused by the current timetable for shared metering arrangement is not known. This information would help the SVG to understand whether an Issue Group would be value for money and worth doing.

SVG's decision to defer

'Best' and 'reasonable' endeavours

The Master Registration Agreement (MRA) attendee queried the use of 'best endeavours' in the original redlining, suggesting that the obligation may present too large a burden on the MOA, HHDC and HHDA. A Member proposed to use the term 'reasonable' instead. The SVG considered the legal interpretation of both terms (see below). An SVG Member noted that one respondent to the CP Consultation believed that 'best endeavours' was not strong enough, which is the opposite of what the SVG was now proposing. Following discussion, the SVG unanimously agreed to amend the redlining to change 'best endeavours' to 'reasonable endeavours', as it was viewed as a much more achievable obligation.

The SVG considered the materiality of the change, and agreed that the change to the draft redlining was material due to differing legal obligations. As the amendment to the original redlining is a material change, the SVG agreed that CP should go out for a second CP Consultation.

Legal interpretation

The terms 'best endeavours' and 'reasonable endeavours' differ in what is required of a Party to achieve their various contractual obligations.

Although there is no fixed meaning for these terms, when litigated the Courts have interpreted these terms based on the facts of specific cases. ELEXON has identified the following guidance from case law.

'Best endeavours' requires the party to take all reasonable courses of action to achieve the desired result.

- This includes taking those courses of action within its power which can achieve the desired result, and which a prudent, determined and reasonable person, acting in his or her own interests, and desiring to achieve that result, would take.

- It is likely to involve spending money, although there is no rule on how much. However, the party is not expected to spend money that would result in its financial ruin or disregard its shareholders' interests or breach its duties to them.

'Reasonable endeavours' requires a person to take a reasonable course of action to achieve the desired result.

- In deciding which course to take, the party is permitted to balance its contractual obligation against all relevant commercial considerations. These considerations could include its relationships with third parties, its reputation, likely costs and the chances of achieving the desired result.
- The party is entitled to consider its own financial interests in deciding how best to comply with this obligation.
- If a reasonable endeavours obligation is coupled with specific steps that the party must take, that party must take those steps irrespective of the cost of doing so.

8 Industry Views from Second Consultation

CP1483 was issued for a second CP consultation on 10 April 2017, with a response deadline of 5 May 2017. The objective of the second CP Consultation was to consider the material change to the redlining, which amended 'best endeavours' to 'reasonable endeavours'. The amendment was considered material by the SVG, due to the change in obligation.

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

Summary of CP1483 second CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree that the amended draft redlining delivers the intent of CP1483?	7	0	0	0
Do you have further comments?	3	4	-	-

Comments on the CP

The same seven respondents who responded to the first CP Consultation responded to the second CP Consultation.

Amended redlining following material change

All seven respondents to the second CP Consultation agreed that the amended redlining delivers the CP1483 proposed solution, with one respondent echoing the SVG's views that 'best endeavours' would place an onerous requirement on Parties which may not be practicable.

In relation to the material change, one respondent highlighted the need for all Code Subsidiary Documents (CSDs) to be treated with the same legal scrutiny. ELEXON noted that all CSDs are legal documents that undergo the same change process. In discussion with ELEXON, the respondent indicated that the intension of his comment was with regard to ensuring a consistent approach across all BSCPs. The respondent indicated that the same scrutiny around the material change in the redlining should also be applied to the other issues Shared Metering are experiencing, due to the lack of clarity within BSCPs. The respondent agreed that they are happy for these concerns to be addressed by an Issue Group on Shared Metering.

Issue Group to consider broader issues

Three respondents to the CP Consultation provided further comments on CP1483, to highlight broader issues that were outside the scope of CP1483.

The respondent who did not agree with the CP1483 proposed solution in the first CP Consultation agreed with the amended redlining. However, the respondent confirmed that they still did not agree with the proposed solution, as they believed that replacing '2 WDs' with 'reasonable endeavours' was a backwards step. The respondent also questioned the benefit of including HHDA and MOAs in the change.

In discussion with ELEXON, the respondent acknowledged the responses provided by ELEXON in the first Assessment Report, with regard to their broader concerns with the redlining. This respondent also expressed an interest in these issues being considered in a future Issue Group on Shared Metering.

Another respondent expressed concerns on how the HHDC is made aware that a site is a shared site. ELEXON confirmed with the respondent that their comment had previously been highlighted by another respondent as part of the first CP Consultation.

In the appendix of the first CP1483 Assessment Report, ELEXON acknowledged that the comments raise an important question, and recommended that the issue be assessed and addressed as part of an Issue Group on Shared Metering. In discussions with ELEXON, the respondent confirmed that they were comfortable with ELEXON's response, and suggested their comments be picked up in a future Issue Group. The respondent also suggested the Implementation Date for CP1483 be delayed until the Issue Group has a solution.

Change of Implementation Date

In addition to these comments, a further respondent suggested that the Implementation Date be pushed back to February 2018. This was due to an identified internal impact in the creation of minor process changes, which had been identified since the first CP Consultation. ELEXON confirmed that the Implementation Date could be amended from November 2017 to February 2018, and would not have a material impact on Metering and Settlement.

SVG's final views

The SVG considered CP1483 at its meeting on 4 July 2017 ([SVG197/04](#)).

The SVG noted the responses to the second CP Consultation, and agreed that the Implementation Date be changed from the November 2017 BSC Release to February 2018 BSC Release.

Final decision

The SVG have:

- **APPROVED** CP1483 for implementation on 22 February 2018 as part of the February 2018 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
CP	Change Proposal
CMRS	Central Meter Registration Service
DA	Data Aggregator
DC	Data Collector
HH	Half Hourly
MOA	Meter Operator Agent
MRA	Master Registration Agreement
PAB	Performance Assurance Board (<i>Panel Committee</i>)
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
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
D0151	Termination of Appointment or Contract by Supplier

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
2,3,4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
3	CP1483 page on the ELEXON website	CP1483 'Changes to BSCP550 – shared metering arrangements'
7	SVG192 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-192/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-192/

CP1483
Final CP Report

5 July 2017

Version 0.1

Page 14 of 20

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External Links		
Page(s)	Description	URL
10	SVG194 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-194/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-194/
6, 14	SVG197 page on the ELEXON website	https://www.elexon.co.uk/meeting/svg-197/

Appendix 2: Comments on the Original Redlining

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP550, page 6	<p>Could the paragraph commencing 'Where a new or modified allocation schedule...' be clarified? Is this trying to say that where the allocation between the Primary + Secondary MSIDs is wrong this cannot normally be corrected but where the total value is wrong this can be corrected (by following the estimation rules in BSCP502) therefore this can be retrospectively applied. Might be worth further clarification</p> <p>Also should approved Trading Disputes not allow for retrospective corrections? If so maybe text such as 'Except for Approved Trading disputes...' should be included?</p>	<p>The allocation schedule is sharing out Settlement data between Suppliers. If the schedule is incorrect then it is highly unlikely that Settlement will be impacted. If there is no Settlement Error then there can be no corrections in Settlement.</p> <p>Trading Disputes are relevant for Settlement Errors in accordance with Section W of the BSC.</p>
BSCP550, 3.1.9 and a number of other sections	Should the sentence '(HHDC and Secondary Supplier(s) should receive the initial Allocation Schedule by Gate Closure)' now be removed throughout the document since this CP proposes that this takes place at least 5 WD before the appointment starts?	Yes and these references have been removed throughout the document.
BSCP550, 3.1.10	How does the HHDC know to expect an Allocation Schedule, what tells them this is a shared site?	This is an important question and will be assessed and addressed in the Issue Group.
BSCP550, 3.1.19	Is this step required at all now, since all the previous activities must have been completed by this point (i.e. Gate Closure)?	No, this step is not required and has been removed from the redlining.
BSCP550, 3.2.1.10	This step states that the primary Supplier sends the HHDC appointment details. In this scenario, I thought it worth pointing out that it is possible that the HHDC has already been appointed by that Supplier under a standard none shared arrangement for a prior period. Is it intended that the Supplier has	<p>The section this refers to, 3.2, is for change of Supplier for an existing Shared Metering System. As such the Supplier will be new and would not have appointed the HHDC formally yet.</p> <p>The HHDC does not have to automatically accept the</p>

Comments on the CP1483 Proposed Redlining

Document & Location	Comment	ELEXON's Response
	<p>to send a further appointment, with an effective date aligned to the start date of the shared arrangement?</p> <p>Where this new start date < 5 WD in the future, if the HHDC is unaware it relates to a shared arrangement, they will typically just accept the appointment. Therefore, in order to deliver the intention of the CP, the HHDC must know that the site is shared before any D155s are sent.</p> <p>However, if the HHDC is aware that the incoming appointment does relate to a shared site, the appointment would be rejected and the existing appointment would continue, is this correct?</p>	<p>appointment. If this is material it can be looked at in the Issue Group.</p> <p>Lastly, it is not the case that the appointment would be rejected if the HHDC is aware the incoming appointment relates to a shared site. This section of the procedure is for moving from a Single to Shared SVA Metering System, so such an action would not make sense.</p>
BSCP550, 3.1.8 to 3.1.14	<p>Please can this be clarified.</p> <p>If the Primary Supplier registers both primary and secondary MSIDs 5 WD before Appointment Start Date and the Secondary Supplier also has to give 5 WD notice before Appointment Start (3.1.14), how does this work?</p> <p>Step 3.1.11 has the Primary Supplier notifying the Secondary Supplier who the Agents are within 2 WD of 3.1.8. Surely this then doesn't allow the Secondary Supplier enough time to also give 5 WD notice when sending in their appointment.</p> <p>I guess this issue is also present under other registration activities.</p>	<p>This point is not related specifically to CP1483 but the current arrangements. This scenario will be worked through as part of the Issue as it is relevant to both the current and proposed changes.</p>
BSCP550, 3.2.3	<p>In the real world, on change of Supplier (either Primary or Secondary) it is entirely likely that this would also trigger a co-</p>	<p>It is difficult to predict what an incoming Supplier's requirement may be. If there is a requirement to change the shared relationship</p>

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	incidental change in Allocation schedule – this doesn't seem to have been captured?	then BSCP550 already covers this.
BSCP550, 3.2.6.9	<p>Does the primary Supplier only optionally need to terminate the HHDC appointment where a site reverts from shared to single Metering System so the words 'as required' could be added? The Supplier may want his Agent's appointment to continue.</p> <p>This also triggered me to think of the scenario where a Shared Metering System changes (say) from 2 Secondary Suppliers down to a single Secondary Supplier, has this process been covered?</p>	<p>The first step of the section, 3.2.6.1, states that 'Following agreement with other Secondary Suppliers to terminate Shared Meter Arrangement'. This implies that this has to be agreed with both parties and once agreed it is mandatory for the Primary Supplier to revert back to a Single SVA Metering System.</p> <p>No, the process mentioned in the second paragraph has not been covered.</p>
BSCP550, 4.6	<p>A number of similar points follow, some of which could be resolved by adding in a phase such as 'The validation to be undertaken, on a best endeavours basis, by an HHDC shall be as follows:'</p> <p>I will describe why below.</p>	Similarly, answers are below.
BSCP550, 4.6.1	Obviously the HHDC can only do this if they have received a D268 on all the MPANs within the shared arrangement	Yes.
BSCP550, 4.6.2	How is this expected to be achieved?	This is not within the scope of this CP, but it can be looked at in the Issue Group.
BSCP550, 4.6.3	<p>Given under the initial registration process the HHDC verifies that the same MOP has been appointed to each MPAN within a Shared arrangement, are you suggesting that the HHDC has to continue to check this during the entirety of their appointment as HHDC, since HHMO appointments can change over time?</p> <p>By implication the HHDC then has to monitor D148s from Suppliers</p>	Yes, the HHDC will have to check the same MOA has been named for all appointments.

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	<p>and the sender of every D268 we receive?</p> <p>Also, BSCP550 then doesn't state what the HHDC should do where should a discrepancy is found</p>	
BSCP550, 4.6.4	Where an appointment is < 5 WD in the future, this step implies that such an appointment is rejected? If so this should be described in more detail under the interfaces and timetable sections, including the information required to be sent back to the Supplier(s) from the HHDC.	No, as it states: 'Where the date is not 5 WDs ahead the HHDC shall request the Supplier to set the appointment dates to 5 WDs ahead of the latest appointment'.
BSCP550, 4.6.5	What is meant by 'associated maintenance rules'	This is an erroneous reference and has been removed.
BSCP550, 4.6.8	<p>I can understand why it might be sensible to assume that setting meter and pulse multipliers to zero will reduce the risk of potential double counting data and lead to less errors in Settlement data but this is too prescriptive and somewhat clumsy.</p> <p>Most modern meters do not store values in pulses so setting the pulse multiplier to zero would be irrelevant.</p> <p>If Suppliers and their HHDC take equally effective but alternative approaches to ensure data accuracy this should be sufficient. How this is achieved isn't important providing it is a robust, auditable, accurate approach.</p> <p>If the HHDC is collecting data under the Primary MPAN correctly and has a valid Allocation schedule, what relevance does a pulse multiplier necessarily have on the values submitted under the</p>	We consider it is important to set the pulse multipliers of pseudo meters to zero. It means that data from these meters cannot inadvertently be settled as they are only used to share out the volumes between Suppliers.

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	Secondary MPAN(s)?	
BSCP550, 1.2	At the time of being appointed or de-appointed to a shared metering arrangement by a Supplier (Primary or Secondary) the MOA, HHDC and HHDA, as appropriate, shall use best endeavours to confirm that the appointment details are correct and consistent. Where there is an error in appointment details then these will be resolved with the relevant Supplier.	The MOA and HHDA are needed to confirm these details because they are equally affected.
Sections 3.1.9, 3.2.1.11 and 3.2.1.16	Reinstate process step but remove 'HHDC' from the 'From' column	These process steps are not needed because the MOA, HHDC and HHDA have been given 'best endeavours' to confirm.