

4.3 CP Form

Change Proposal – BSCP40/02	CP No: 1507 <i>Version No: 1.0</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) Updates to BSCP520 to align with working practices and UMSUG recommendations	
Description of Problem/Issue (mandatory by originator) <p>The Unmetered Supplies User Group (UMSUG) has identified various issues with BSC Procedure (BSCP) 520 ‘Unmetered Supplies Registered in SMRS’.</p> <p><u>Need for obligations on Unmetered Supplies Operators to support the new measured Central Management System arrangements</u></p> <p>The UMSUG and the Supplier Volume Allocation Group (SVG) have developed a new subset of the unmetered Central Management Systems (CMS) arrangements, to cater for electric vehicle (EV) ‘slow’ charging. The UMSUG and SVG have already made changes to the Operational Information Document to provide guidance on these new ‘measured CMS’ (mCMS) arrangements (see SVG paper 206/04).</p> <p>As part of these arrangements, the SVG has agreed that Unmetered Supplies Operators (UMSOs, i.e. Distributors) should use separate Metering System IDs (MSIDs) for any EV charge points within their inventories of unmetered Apparatus. This will facilitate any potential future requirements to allocate different Line Loss Factors to these MSIDs, or to report EV charge point consumption. BSCP520 should therefore include this new requirement on UMSOs.</p> <p><u>Lack of timescales on UMSOs’ inventory validation process</u></p> <p>BSCP520 Sections 3.1 and 3.2 do not currently state any timescales in which an UMSO should validate a Customer’s submitted inventory of unmetered supplies (UMS) Apparatus. The BSC Auditor has highlighted this in Market Issue 3781.</p> <p><u>Scope for further clarification regarding receipt of Market Domain Data</u></p> <p>BSCP520 Section 3.10 describes how UMSOs and Meter Administrators (MAs) can optionally request Market Domain Data (MDD) data flows from the Supplier Volume Allocation Agent (SVAA). UMSOs and MAs do not automatically receive MDD data flows from the SVAA. Instead, they download UMS-specific MDD items from the BSC Website. For example, UMS Charge Codes and Switch Regimes form part of MDD but are not included in the data flows. ELEXON publishes these in spreadsheet form and notifies UMSOs/MAs of changes to them through MDD Circulars.</p> <p>UMSOs and MAs have therefore queried the requirement in step 3.10.3 for them to send acknowledgement to the MDD Manager (MDDM, a function of the SVAA) on receipt of MDD. The BSC Auditor has highlighted this in Market Issue 3781.</p> <p>Existing step 3.10.3 only requires an UMSO or MA to send acknowledgement if they have specifically requested to receive MDD data flows from the SVAA. However, the BSC Auditor has suggested that there is scope to make this clearer and that, specifically, UMSOs and MAs do not need to acknowledge receipt of MDD Circulars.</p>	

Unnecessary requirement for MAs to provide UMSOs with list of missing CMS Unit References

BSCP520 Section 4.6.3.3 describes MAs' obligations in relation to Dynamic Meters that use CMS Data. It currently requires MAs to provide both UMSOs and Customers with an exception list of any CMS Unit References that are reported in the control file but are missing from the operational event log. The UMSUG believes that UMSOs do not require or use this report regularly (if at all), because it already goes to the Customer.

Scope for clarifications of MA obligations relating to Dynamic Meters

The UMSUG believes there is scope to add extra clarity to certain MA obligations specified in BSCP520 Sections 4.6.3.2 and 4.6.3.3, to align with existing working practice.

Other 'housekeeping' issues

BSCP520 Section 1.2.1(q) sets out the types of UMS information that UMSOs must validate against the OID and its associated spreadsheets. It does not currently include Variable Power Switch Regimes, although these should also be validated.

There are various references throughout BSCP520 to the Equivalent Meter (EM) Output File Format being in Section 4.5.4. These cross-references are incorrect and should be to Section 4.6.4.

Proposed Solution (mandatory by originator)

The UMSUG recommends the following changes to BSCP520:

- Define the acronym 'mCMS' in Section 1.7.1.
- Define the terms 'Variable Power Switch Regime' and 'measured Central Management System' in Section 1.7.2.
- Include an obligation on UMSOs, in Section 1.2.1(q), to validate Variable Power Switch Regimes against the OID and associated spreadsheets.
- Introduce a new obligation on UMSOs (in Section 1.2.1's list of UMSO responsibilities) to ensure that MSIDs and inventory data for mCMS are kept separate from, and are not combined with, MSIDs or inventories for other UMS Apparatus.
- Add BSCP509 'Changes to Market Domain Data' to the list of 'Associated BSC Procedures' in Section 1.6.
- Introduce a 15 Working Day (WD) timescale on UMSOs to validate new and amended UMS inventories under Sections 3.1 and 3.2 respectively.¹
- Add the words 'data flows' to relevant steps in Section 3.10, to clarify that these only relate to MDD data flows.
- Remove the existing reference to 'MDD Circular' in step 3.10.2, to avoid confusion over whether UMSOs and MAs need to acknowledge receipt of the MDD Circulars issued by ELEXON.
- Clarify, in step 3.10.2, that the SVAA only sends MDD data flows to UMSOs and MAs on request.
- Clarify the existing footnote in Section 3.10, to more clearly distinguish between this process (which only covers MDD data flows) and Section 3.12 (which covers UMS-specific MDD items that are not included in the data flows).

¹ The UMSUG believes this is the maximum timescale that should be required, although a minority of members believe that the validation process could be completed quicker in 10WD. At the UMSUG's request, ELEXON will add a question to the CP Consultation seeking views on whether the 15WD timescale is appropriate.

- Add a requirement on ELEXON, in Section 3.12, to notify UMSOs and MAs of approved Charge Codes and Switch Regimes via MDD Circular in accordance with BSCP509 (reflecting existing practice).
- Applying similar UMSO/MA obligations in 3.12 regarding use of MDD (for the non-data-flow MDD items) as currently appear in 3.10 (for the data flows).
- Clarify, in Section 4.6.3.2, that it is the MA who determines the warning level above which the Dynamic Meter flags any time-keeping drift in the Photo Electric Control Unit (PECU) array.
- Clarify, in Section 4.6.3.3(c), that the existing reference to reporting the CMS Unit Reference in a ‘file’ means in a log file.
- Amend Section 4.6.3.3, so that MAs continue to provide the report of missing CMS Unit References to Customers each month but only to UMSOs on request.
- Amend various erroneous cross-references to the EM Output File Format, so that these correctly point to Section 4.6.4.

We do not anticipate any impact on MAs’ existing working practices. Changes to UMSOs’ (Distributors’) working practices will be required.

Justification for Change (mandatory by originator)

These changes will support, clarify and remove potential inefficiencies in the BSC’s UMS arrangements – including addressing an existing BSC Audit Market Issue.²

At its meeting on 1 March 2018, the UMSUG recommended that ELEXON raises this CP (see [UMSUG papers 122/01 and 122/02](#)). The changes to Sections 3.10 and 3.12 were added subsequently following discussion with the BSC Auditor; the UMSUG reviewed these by correspondence.

We also presented the specific EV charging changes to the SVG at its meeting on 27 March 2018 ([SVG paper 206/04](#)). The SVG agreed that ELEXON should progress these through a CP.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator)

This CP facilitates the provisions of BSC Section S8 ‘Unmetered Supplies’.

Estimated Implementation Costs (mandatory by BSCCo)

£240 (one ELEXON working day)

Configurable Items Affected by Proposed Solution(s) (mandatory by originator)

BSCP520 ‘Unmetered Supplies Registered in SMRS’.

Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator)

None.

² The remaining part of Market Issue 3781 relates to audit trails. The UMSUG believes that there is no obvious case for action in this area. ELEXON, with the BSC Auditor, will use the next BSC Audit to monitor and clarify any issues.

Related Changes and/or Projects (mandatory by BSCCo) None.
Requested Implementation Date (mandatory by originator) 1 November 2018 (November 2018 Release).
Reason: Next available Release.
Version History (mandatory by BSCCo) We raised Version 1.0 of this CP on 15 May 2018.
Originator's Details:
BCA Name: Kathryn Coffin
Organisation: ELEXON
Email Address: kathryn.coffin@elexon.co.uk
Telephone Number: 020 7380 4030
Date: 15/05/2018
Attachments: Yes – Redlined BSCP520 (70 pages)