

## CP1507 'Updates to BSCP520 to align with working practices and UMSUG recommendations'



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### Contents

<b>1</b>	<b>Why Change?</b>	<b>2</b>
<b>2</b>	<b>Solution</b>	<b>5</b>
<b>3</b>	<b>Impacts and Costs</b>	<b>7</b>
<b>4</b>	<b>Implementation Approach</b>	<b>8</b>
<b>5</b>	<b>Initial Committee Views</b>	<b>9</b>
	<b>Appendix 1: Glossary &amp; References</b>	<b>10</b>

### About This Document

The purpose of this CP1507 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1507. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1507.

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.
- Attachment A contains the proposed redlined changes to deliver the CP1507 solution.
- Attachment B contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.
- Attachment C contains the CP1507 proposal form.

# 1 Why Change?

## Background

### What are Unmetered Supplies under the BSC?

All energy transfers at points of connection and/or supply via circuits connected to the Distribution Network shall be metered, except in a limited number of defined circumstances set out in the [Electricity \(Unmetered Supply\) Regulations 2001 \(Statutory Instrument 2001/3263\)](#). These exceptions, known as Unmetered Supplies (UMS), are at the discretion and approval of the Unmetered Supplies Operator (UMSO) of the relevant Licensed Distribution System Operator (LDSO).

An UMS means a supply of electricity to a particular inventory of equipment in respect of which a LDSO has issued an Unmetered Supply Certificate. For example, this equipment could be any electrical equipment that draws a current and is connected to the Distribution Network without a meter, e.g. street lights, traffic signs, zebra crossings, etc.

The Balancing and Settlement Code (BSC) and [BSC Procedure \(BSCP\) 520 'Unmetered Supplies Registered in SMRS'](#) set out how the energy used by UMS equipment is calculated and applied in Settlement.

### Unmetered Supplies Operator (UMSO)

The UMSO is part of the LDSO, commonly known as the Distribution Business or Network Operator. The UMSO is responsible for looking after all of the UMS on its network. The UMSO makes new connections and decides what equipment is suitable for treatment as an UMS. The UMSO provides a summarised inventory to the Meter Administrator (MA) for Half Hourly (HH) traded UMS or calculates an Estimated Annual Consumption (EAC) for Non HH (NHH) traded UMS.

### Unmetered Supplies User Group (UMSUG)

The UMSUG is an expert group reporting to the SVG, advising it on the UMS arrangements under the BSC. Its work includes reviewing Charge Code applications, advising on changes to the relevant BSC subsidiary documents (e.g. to BSCP520), the resolution of issues and new developments relating to UMS. The UMSUG is chaired by ELEXON and meets on an ad-hoc basis driven by the SVG and business need.

### BSCP520 'Unmetered Supplies Registered in SMRS'

The requirements for UMS registered in a Supplier Meter Registration Service (SMRS) are set out in BSCP520 'Unmetered Supplies Registered in SMRS'. It states that metering data for Settlement purposes shall be derived utilising either by an Equivalent Meter (EM) providing HH data; or an EAC per Metering System Identifier (MSID), with an appropriate Profile Class and Standard Settlement Configuration (SSC).

There are two types of Equivalent Meters:

- **Passive Meters** – which allocate the unmetered consumption across the HH periods by relating annual burning hours to the daily time of sunrise and sunset; and



#### Meter Administrator (MA)

The MA is responsible for providing HH consumption data into Settlement. This is the consumption of a particular Customer in kWh, for each half hour of every day. The Supplier will appoint the MA for Settlement purposes.



#### Supplier Meter Registration Service (SMRS)

The SMRS is the service provided or to be provided by a LDSO for the registration of Metering Systems at Boundary Points on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

CP1507  
CP Consultation

4 June 2018

Version 1.0

Page 2 of 11

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- **Dynamic Meters** – which allocate the unmetered consumption across the HH periods by reference to the operation of a number of photoelectric cells (PECU Arrays) or by using actual switching times reported by a Central Management System (CMS).

## What are Central Management Systems?

CMS are dynamic controls which manage the electrical load of UMS equipment that can operate at multiple on/off times and/or dimming levels. A CMS records these events, which the MA then uses to calculate consumption data for Settlement. This is a form of dynamic HH Settlement.

Different CMS designs operate in different ways. Some only provide an instruction to the controlled equipment and assume the equipment reacts to the instruction. Others receive feedback from the controlled equipment. Some designs measure the energy consumed and return information which reflects the actual consumption.

## What is the issue?

The UMSUG has identified various issues with [BSCP520 'Unmetered Supplies Registered in SMRS'](#).

## Need for obligations on UMSOs to support the new measured CMS arrangements

The UMSUG and the SVG have developed a new subset of the CMS arrangements to cater for electric vehicle (EV) 'slow' charging. The UMSUG and SVG have already made changes to the [Operational Information Document](#) (OID) to provide guidance on these new 'measured CMS' (mCMS) arrangements, which use feedback from an active measuring device ([SVG paper 206/04](#)).

As part of these arrangements, the SVG has agreed that UMSOs 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.

## Lack of timescales on UMSOs' inventory validation process

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 UMS Apparatus. The BSC Auditor has highlighted this in [Market Issue 3781](#).

## Scope for further clarification regarding receipt of Market Domain Data

BSCP520 Section 3.10 describes how UMSOs and 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.

UMSOs and MAs have therefore queried the requirement in step 3.10.3 for them to send acknowledgement to the MDD Manager (a function of the SVAA) on receipt of MDD. The BSC Auditor also highlighted this in Market Issue 3781.

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.

### **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 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

The UMSUG recommends the following amendments to BSCP520, as displayed in the table below. This section is aimed to be read in parallel to the redlined BSCP520 document in attachment A.

BSCP520 Section(s)	Update Proposed
<b>1.7.1</b>	<ul style="list-style-type: none"> <li>Define the acronym 'mCMS' (measured Central Management System).</li> </ul>
<b>1.7.2</b>	<ul style="list-style-type: none"> <li>Define the terms 'Variable Power Switch Regime' and 'measured Central Management System'.</li> </ul>
<b>1.2.1</b>	<ul style="list-style-type: none"> <li>Include an obligation on UMSOs, in (q), to validate Variable Power Switch Regimes against the OID and associated spreadsheets.</li> <li>Introduce a new obligation on UMSOs (in the 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.</li> </ul>
<b>1.6</b>	<ul style="list-style-type: none"> <li>Add BSCP509 'Changes to Market Domain Data' to the list of 'Associated BSC Procedures'.</li> </ul>
<b>3.1 and 3.2</b>	<ul style="list-style-type: none"> <li>Introduce a 15 Working Day (WD) timescale on UMSOs to validate new and amended UMS inventories under Sections 3.1 and 3.2 respectively.<sup>1</sup></li> </ul>
<b>3.10</b>	<ul style="list-style-type: none"> <li>Add the words 'data flows' to relevant steps in Section 3.10, to clarify that these only relate to MDD data flows.</li> <li>Clarify the existing footnote, 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).</li> </ul>
<b>3.10.2</b>	<ul style="list-style-type: none"> <li>Remove the existing reference to 'MDD Circular', to avoid confusion over whether UMSOs and MAs need to acknowledge receipt of the MDD Circulars issued by ELEXON.</li> <li>Clarify that the SVAA only sends MDD data flows to UMSOs and MAs on request.</li> </ul>
<b>3.12</b>	<ul style="list-style-type: none"> <li>Add a requirement on ELEXON, to notify UMSOs and MAs of approved Charge Codes and Switch Regimes via MDD Circular in accordance with BSCP509 (reflecting existing practice).</li> <li>Apply similar UMSO/MA obligations to those which currently appear in 3.10 (for the data flows) regarding use of MDD (for the non-data-flow MDD items).</li> </ul>
<b>4.6.3.2</b>	<ul style="list-style-type: none"> <li>Clarify 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.</li> </ul>

<sup>1</sup> 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 this CP Consultation seeking views on whether the 15WD timescale is appropriate.

<b>4.6.33</b>	<ul style="list-style-type: none"> <li>Clarify in (c) that the existing reference to reporting the CMS Unit Reference in a 'file' means in a log file.</li> <li>Amend so that MAs continue to provide the report of missing CMS Unit References to Customers each month but only to UMSOs on request.</li> </ul>
<b>4.6.4</b>	<ul style="list-style-type: none"> <li>Amend various erroneous cross-references to the EM Output File Format, so that these correctly point to Section 4.6.4.</li> </ul>

## Proposer's rationale

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

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.

In addition, the specific EV charging changes were presented 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.

### CP Consultation Question

Do you agree with the CP1507 proposed solution?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment B

## Proposed redlining

Attachment A contains the proposed redlining to BSCP520 'Unmetered Supplies Registered in SMRS'.

### CP Consultation Question

Do you agree that the draft redlining delivers the CP1507 proposed solution?

*If 'No', please provide your rationale.*

We invite you to give your views using the response form in Attachment B

### CP Consultation Question

Do you agree that the proposed 15WD timescale for UMSOs to validate new and amended UMS inventories is appropriate?

*If 'No', please provide your rationale.*

We invite you to give your views using the response form in Attachment B

CP1507  
CP Consultation

4 June 2018

Version 1.0

Page 6 of 11

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<sup>2</sup> 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.

## 3 Impacts and Costs

### Central impacts and costs

#### Central impacts

CP1507 will require changes to BSCP520. No BSC System changes are required for this CP and there will be no impacts on BSC Agents.

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

#### Central costs

The central implementation costs for CP1507 will be approximately £240 (one ELEXON working day of effort) to make the required document change.

### BSC Party & Party Agent impacts and costs

ELEXON seeks to clarify any BSC Party and Party Agent impacts through this CP Consultation. We do not anticipate any impact on MAs' existing working practices. However, changes to UMSOs' (Distributors') working practices will be required.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
UMSO	We expect changes to working practices

#### CP Consultation Questions

Will CP1507 impact your organisation?

*If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1507 and the CP1507 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.*

Will your organisation incur any costs in implementing CP1507?

*If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.*

We invite you to give your views using the response form in Attachment B

## 4 Implementation Approach

### Recommended Implementation Date

CP1507 is targeted for implementation on **1 November 2018** as part of the November 2018 BSC Release.

This is the next available Release that can include this CP.

#### CP Consultation Question

Do you agree with the proposed implementation approach for CP1507?

*Please provide your rationale.*

We invite you to give your views using the response form in Attachment B



### SVG's initial views

CP1507 was presented to the SVG on 29 May 2018 ([SVG208/04](#)) for information, with the SVG noting its proposed progression timetable. No comments or additional questions to be included in the CP Consultation were provided by the SVG.

## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
CMS	Central Management System
CP	Change Proposal
CPC	Change Proposal Circular
EAC	Estimated Annual Consumption
EM	Equivalent Meter
EV	Electric Vehicle
HH	Half Hourly
LDSO	Licensed Distribution System Operator
MA	Meter Administrator
mCMS	Measured Central Management System
MDD	Market Domain Data
MDDM	Market Domain Data Manager
MSID	Metering System Identifier
OID	Operational Information Document
PECU	Photo Electric Control Unit
SMRS	Supplier Meter Registration Service
SSC	Standard Settlement Configuration
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group
UMS	Unmetered Supply(ies)
UMSO	Unmetered Supplies Operator
UMSUG	Unmetered Supplies User Group

### 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	BSCPs page on the ELEXON website	<a href="https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/">https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/</a>

CP1507  
CP Consultation

4 June 2018

Version 1.0

Page 10 of 11

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External Links		
Page(s)	Description	URL
3, 4	Central Management Systems page on the ELEXON website	<a href="https://www.elexon.co.uk/operations-settlement/unmetered-supplies/central-management-systems/">https://www.elexon.co.uk/operations-settlement/unmetered-supplies/central-management-systems/</a>
3	Operational Information Document	<a href="https://www.elexon.co.uk/guidance-note/operational-information-document/">https://www.elexon.co.uk/guidance-note/operational-information-document/</a>
3, 7	SVG 206 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/svg-206/">https://www.elexon.co.uk/meeting/svg-206/</a>
4	BSC Audit page on the ELEXON website	<a href="https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-techniques/bsc-audit-performance-assurance-framework/">https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-techniques/bsc-audit-performance-assurance-framework/</a>
7	UMSUG 122 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/umsug-122/">https://www.elexon.co.uk/meeting/umsug-122/</a>