

P376 'Utilising a Baselining Methodology to set Physical Notifications'

Date and time	15 November 2021	Purpose	For review
To	CVA and SVA Release Circular distribution lists	From	BSC Change

P376 'Utilising a Baselining Methodology to set Physical Notifications' – Review of BSC Configurable Items

1. What is the purpose of this circular?

1.1 This circular is to invite BSC Parties, Party Agents and any interested third parties to review the draft versions of the BSC Configurable Items (CIs) that we are amending for Modification [P376 'Utilising a Baselining Methodology to set Physical Notifications'](#), approved by Ofgem on 6 August 2021 with an Implementation Date of 23 February 2023 as part of the standard February 2023 BSC Release.

1.2 In addition to any generic comments and observations, we would particularly like to request your response to the following questions:

- Do you agree that registration reports sent to Parties from the Central Registration Agent (CRA) should not be amended for P376?
- Do you agree that the Settlement Reports (SAA-I014) sent to Parties from the Settlement Administration Agent (SAA) should be amended to include the Settlement Expected Volume (SEV_{ij})
- Do you agree that the P376 solution should not include provisions for treating Scottish Bank Holidays as Non-Working Days?

Further details on these questions are given in sections 4, 5 and 6 of this paper.

1.3 Please return your comments to releases@elexon.co.uk, using the review form provided as Attachment B to this circular, by **17:00 on 6 December 2021**. If you wish give your response over the phone, please contact **Chris Arnold** on **020 7380 4221**.

2. Who is impacted by the Modification?

2.1 P376 will impact:

- Virtual Lead Parties (VLPs) and Asset Metering VLPs (AMVLPs) who wish to use the P376 solution;
- Half Hourly Data Aggregators (HHDACs);
- Suppliers who wish to use the P376 Solution; and
- BSC Parties (as a result of proposed changes to SAA-I014 Settlement Reports).

3. Which BSC Configurable Items do I need to review?

3.1 The following BSC CIs are presented for your review and comment before being presented to the Panel for approval in 13 January 2022, ISG and SVG on 11 January 2022. Please note that not all Configurable Items associated with P376 are presented in this Consultation as they are still in development, these will also be consulted on prior to the Implementation Date. You can download the redlined changes from the [P376 webpage](#) or the [Release Circulars webpage](#).

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BSC CI(s)	
Document	Approving Committee
BSCP15 – BM Unit Registration	ISG and SVG
BSCP503 - Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS	SVG
BSCP602 – SVA Metering System Register	Panel
Baselining Methodology Document	Panel

- 3.2 Please see section 10 of this paper for a summary of the changes made to the documents.
- 3.3 Other BSC Configurable Items which are dependent on the final software solution for P376, will be issued for industry review by at latest summer 2022. A full list of documents that we expect to be impacted are given below:

Further CIs to be developed	
Document	Summary of Changes
BSCP01, 'Overview of Trading Arrangements'	Brief details of Baselining and the requirement for Submitted Expected Volumes
BSCP508, 'Supplier Volume Allocation Agent'	Details of new data flows added
BSCP537, 'Qualification Process for SVA Parties, SVA Party Agents and CVA MOAs'	New requirements for Suppliers, VLPs and AMVLPs
Self Assessment Document	New requirements for Suppliers, VLPs and AMVLPs
Communication Requirements Document	Details of new data flows added
SVA Data Catalogue Volume 1	Details of new data flows added
SVA Data Catalogue Volume 2	Details of new data flows added
Interface Definition Document Part 1	Details of new data flows added
Interface Definition Document Part 2	Details of new data flows added
Interface Definition Document Spreadsheet Part 1	Details of new data flows added
Interface Definition Document Spreadsheet Part 2	Details of new data flows added
SAA Service Description	P376 SAA requirements incorporated
SAA User Requirements Specification (URS)	P376 SAA requirements incorporated
SVAA Service Description	P376 SVAA requirements incorporated
SVAA User Requirements Specification (URS)	P376 SVAA requirements incorporated

Please note that although we are not consulting on the interface changes yet (IDD or SVA Data Catalogue), the IEG has discussed some of the key interfaces, and draft details are included for information in attachment E.

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4. Registration Reports

- 4.1 The P376 solution (as defined in the Final Modification Report submitted to Ofgem) was silent on the question of whether registration reports sent to Parties from the Central Registration Agent (CRA) would be amended for P376. The IEG subsequently discussed this question, and considered whether the following reports should be amended to include the BM Unit Baselining Indicator. This new data item (introduced by Modification P376) indicates whether a BM Unit is Baselined:
- CRA-I014 (Registration Report) sub-flow 5 (BM Unit Registration), sent by CRA to Parties registering BM Units
 - CRA-I020 (Operations Registration Report), sent by CRA to NGESO and Elexon.
- 4.2 The benefit of changing these reports is that it would provide clarity to recipients about which BM Units they have registered as Baselined. However, our proposal is not to make changes to these reports for P376 because:
- The cost to all report recipients (including those not using P376) of amending systems to handle amended report formats would potentially outweigh any benefit; and
 - Parties registering BM Units will be able to see (through Elexon’s online Participant Management Platform) which BM Units they have registered as Baselined; and
 - The proposed change to Settlement Reports (see below) will provide parties with details of which BM Units are using Baselining.

5. Settlement Reports

- 5.1 The P376 solution (as defined in the Final Modification Report submitted to Ofgem) was silent on the question of whether changes should be made to the Settlement Reports (SAA-I014) sent to Parties from the Settlement Administration Agent (SAA). However, the IEG proposes that these reports should be amended to include the Settlement Expected Volume (SEVij). This new data item is introduced by P376, and reporting it will allow parties to validate the calculation of Non-Delivery Charges, should they wish to do so.

6. England and Wales Holidays on Event Days

- 6.1 The IEG discussed whether the Baselining Methodology should include provisions for treating Scottish Bank Holidays as Non-Working Days.
- 6.2 The draft Baselining Methodology developed by the P376 Workgroup does not include such provisions, and will therefore treat Scottish Bank Holidays as Working Days. This potentially means that calculated baselines could be less accurate on Scottish Bank Holidays for sites (in Scotland) that close (or otherwise change their behaviour) on those days.
- 6.3 The P376 solution allows the BSC Panel to approve multiple Baselining Methodologies, and the IEG therefore concluded that the BSC Panel could address this issue by approving a second Baselining Methodology that differed only in treating Scottish Bank Holidays as non-Working Days. In the absence of data about the number of sites potentially affected by this issue the IEG propose that this second Baselining Methodology should not be developed for P376 Go-Live. However, the Baselining Methodology Document includes a change process that would allow parties to propose the development of such a Baselining Methodology, should the issue turn out to be material.

7. What will happen after the industry review?

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- 7.1 Elexon will consider and review all comments and update the BSC CIs as required. Elexon will also inform the outcome of any comments to the relevant reviewer and, where we do not agree with a review comment, we will contact the reviewer to discuss the comment and agree on the course of action to take.
- 7.2 We will then take the documents and a summary of any relevant consultation responses to the BSC Panel, ISG and SVG for approval. Associated papers will note any comments that we did not action and the reasons why, and any subsequent course of action undertaken as a result.

8. When will the BSC Configurable Items become effective?

- 8.1 P376 was approved by the Authority on 6 August 2021 for implementation on 23 February 2023 as part of the February 2023 BSC Release. We will ask the BSC Panel, ISG and SVG to approve these BSC Configurable Items to become effective on the P376 Implementation Date.
- 8.2 If you have any queries about this circular, please contact **Chris Arnold** on **020 7380 4221** or email bsc.change@elexon.co.uk.

Attachments

Attachment A – Amended BSC CIs for P376

Attachment B – Response Form

Attachment C – P376 Final Modification Report

Attachment D – P376 Business Requirements

Attachment E – Interface Requirements

Appendix 1 - P376 – Settlement of Secondary BM Units using metering behind the site Boundary Point

9. What's new for P376?

- 9.1 P376 seeks to allow the expected flows at Supplier Volume Allocation (SVA) Metering Systems participating in the Balancing Mechanism (BM) to be calculated using an approved Baseline Methodology. The new Settlement Expected Volume calculated from the baseline values and expected values will be decoupled from the Physical Notification used by the National Electricity Transmission System Operator (NETSO) for dispatch. It will be used in Settlement to calculate Non-Delivery Charges, allowing balancing service providers to be more accurately recompensed for their actual change from normal usage and the impact this change has on the system, thus enabling greater participation.
- 9.2 The P376 Workgroup recognised that further work was required to detail the processes that underpin P376 (Baseline Methodology and registration and maintenance of Baseline MSID Pairs) and so agreed that an Industry Expert Group (IEG) should be formed to discuss and agree the processes in summer 2021. The Workgroup members agreed that drafting the CIs in this way would allow the efficient progression of P376 whilst allowing the equivalent level of expert input into the creation of the processes. They also noted that the processes would reflect the P376 solution and therefore not impact the amended legal text, since approved by the Authority. If deemed necessary, the IEG can reconvene to consider responses to this review.
- 9.3 The key points of the P376 solution are:
- Suppliers, VLPs and AMVLPs can opt their Additional and Secondary BM Units into P376 ("Baseline BM Unit")
 - Suppliers, VLPs and AMVLPs still submit an FPN to National Grid, but the FPN isn't used to calculate Non-Delivery Charges. Instead, Settlement systems calculate their own FPN-equivalent (the "Settlement Expected Volume"). The Lead Party specifies (when they allocate each MSID Pair or AMSID Pair to the Baseline BM Unit) how this will work:
 - MSID Pairs within Baseline BM Units will be registered by the Lead Party as either Baseline MSID (or AMSID Pairs), Non-Baseline MSID Pairs (or AMSID Pairs), or Inactive MSID Pairs (or AMSID Pairs):
 - For Baseline MSID Pairs (or AMSID Pairs) SVAA will use historic metered data to calculate the baseline consumption for the MSID Pair as detailed in the Baseline Methodology CI.
 - For Non-Baseline MSID Pairs (or AMSID Pairs) the Lead Party works out the FPN-equivalent (Submitted Expected Volume), and submits a total figure (per BMU and SP) for all the non-Baseline MSID Pairs
 - For Inactive MSID Pairs (or AMSID Pairs): excluded from the BM Unit (for Settlement purposes). This status is only applicable to Secondary BM Units.
- 9.4 For more information on P376 please contact **Chris Arnold** on **020 7380 4221** or email bsc.change@elexon.co.uk.

10. Summary of changes to CIs

- 10.1 The changes to BSCP602 set out the new processes by which VLPs or Suppliers opting in to the P376 Solution may:
- Register MSID Pairs for Baseline or Inactive
 - Submit Expected Volumes; and
 - Manage Event Days

The changes also include details of validation in relation to MSID or AMSID Pair delivered volume files as well as validation in relation to Baseline or Inactive MSID Pair and AMSID Pair files.

Appendix 1 - P376 – Settlement of Secondary BM Units using metering behind the site Boundary Point

- 10.2 The changes to BSCP503 set out the new processes for Half Hourly Data Aggregators to provide SVAA with up to 60 days of Consumption Data needed to calculate baselines when an MSID Pair is initially registered for Baselineing
- 10.3 The changes to BSCP15 set out the necessary changes to allow VLPs, AMVLPs and Suppliers that choose to use the P376 solution the ability to register MSID or AMSID Pairs appropriately
- 10.4 The changes to the Baselineing Methodology document are minor typographical errors that were highlighted during IEG review.

11. Industry Expert Group Discussions

- 11.1 The P376 IEG, which included representatives of VLPs, NGESO, HHDAs and Supplier Agents has met twice, in October and November 2021, where the group discussed and agreed the following key points:
- There should not be a separate file for Default Submitted Volumes. Parties using the P376 solution should leave the 'Submitted Expected Volume data flow effective to date' field blank to set a BM Unit to the default volume.
 - The GSP Group Data item is not required when registering MSIDs
 - There should be a file acknowledgement and a rejection file (where applicable) sent from SVAA to the Lead Party for each Submitted/Default Expected Volumes.
 - A new process will be required to register MSID Pairs using the Baselineing Methodology and Inactive MSID Pairs rather than altering existing processes. This is to minimise impact on parties who are not intending to utilise the P376 Solution.
 - HHDAs should be responsible for providing historic data under P376 and a new data flow developed for this purpose.
 - The P376 can be used with Elective Half Hourly Metering Systems.
 - SVAA will notify Lead Parties (Suppliers, VLPs and AMVLPs) if there is insufficient data to calculate a baseline
 - New data flows should be developed to inform Lead Parties of calculated baselines
 - The new data item for Settlement Expected Volume should be added to a new version of the SAA-I014 Settlement Report.