

4.3 CP Form

Change Proposal – BSCP40/02	CP No: <i>Version No:</i> <i>(mandatory by BSCCo)</i>
Title (mandatory by originator) 2038-B - BSCP513 Text Change - Bulk Change of agent	
Description of Problem/Issue (mandatory by originator) Following P436 Consequential BSC changes for Switching SCR (REC 3.0), BSCP513 - BULK CHANGE OF NHH SUPPLIER AGENT was amended to explicitly exclude Bulk Changes of Supplier Volume Allocation (SVA) Non Half Hourly (NHH) Meter Operator Agent (MOA), with the stated reason that these appointments would take place in accordance with the Retail Energy Code (REC) Metering Operations Schedule. However, the relevant REC documentation, REC Schedule 14 (Metering Operations) sections 11 and 12, refer back to the requirements of BSCP513. BSCP513.1.6.2 (“Definitions”) also makes clear that references to “Agents” elsewhere in the document include SVA NHH MOAs, and Appendix 4.4 (“BSCP513/01 Bulk Change of Agent Application Form”) includes a field for proposed SVA MOA appointment dates. As written, the terms of BSCP513 and REC Schedule 14 therefore create ambiguity as to how Suppliers should progress Bulk Changes of SVA NHH MOA. With the advent of Market-wide Half Hourly Settlement (MHHS) it is also important that the Bulk CoA process be extended to cover appointments for any new Agent roles that will be introduced. The draft wording of BSCP708 makes clear that Bulk CoA activity should not happen during the migration period, but as currently worded BSCP513 includes only NHH Agent roles and will therefore not apply to the new trading arrangements.	
Proposed Solution (mandatory by originator) Remove references to NHH Agent roles from BSCP513, and remove the reference excluding SVA NHH MOA appointments and the Retail REC Metering Operations Schedule	
Justification for Change (mandatory by originator)	

On 13 May 2023, a Supplier made Elexon aware of two instances in which a high volume of SVA MOA CoA requests had adversely impacted SMRA systems; the volume of requests had also threatened the integrity of an associated Electralink adapter. Given these impacts, it is important to remove any ambiguity around the governance of the Bulk CoA process as it relates to SVA NHH MOAs.

Both Elexon and REC Performance Assurance concur that governance of this process sits more properly under the BSC than it does the REC:

- The CoA volumes directly impact SMRS systems, which are governed under the BSC and not the REC, so the BSC Panel is best equipped to determine the risk and appropriate limits
- Suppliers, who manage the volume of requests being initiated, are BSC Parties and fall under BSC governance
- MOAs (Metering Equipment Managers (MEMs) in REC terms) *do* fall under the governance of the REC, but are not able to initiate CoA requests and so are not subject to the Bulk CoA process

Removing reference to specific NHH Agent roles will not only clarify governance around the process for NHH SVA MOAs but also remove the need for further amendments to BSCP513 to include any new Agent roles in the future. BSCP513 would be future-proofed and fit for purpose until such time as industry systems have advanced to the point that a Bulk CoA process is no longer required.

There is no clear reason why existing Half Hourly (HH) Agent roles should be excluded from the current arrangements, as a similarly significant volume of HH CoA activity would necessarily have the same impact to SMRA systems and carry an equivalent level of risk. All of the existing DTN Data Flows referred to in BSCP513 are used for both NHH and HH metering systems.

The exclusion of HH agent roles from the process is likely due to historically smaller volumes of HH metering systems and it is unlikely that their inclusion now would introduce any meaningful barrier to HH CoA activity.

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

Estimated Implementation Costs (mandatory by BSCCo)

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

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

None

Related Changes and/or BSC Releases (mandatory by BSCCo)
Requested Implementation Date (mandatory by originator)
Reason:
Version History (mandatory by BSCCo)
<i>Originator's Details:</i>
<i>BCA Name:</i>
<i>Organisation:</i>
<i>Email Address:</i>
<i>Telephone Number:</i>
<i>Date:</i>
Attachments: Y/N* (If Yes, No. of Pages attached:) (delete as appropriate)

4.4. CP Form Guidelines

These guidelines are to be used to assist in the completion of the CP Form, given in Appendix 4.3. The guidelines state who should complete each item on the form and whether it is mandatory or optional. They also give a brief description of the information that should be given for each item. For further guidance please contact your BCA/PACA.

- **Title** – mandatory completion by originator – title of CP.
- **CP No.** – mandatory completion by BSCCo – unique number allocated for each individual CP.
- **Version No.** – mandatory completion by originator – when first submitted by the originator, the CP should have a version number of v0.1. Following discussions with BSCCo, any changes required following those discussions, the CP should be updated to v1.0. Should any further amendments/additions/deletions be required to the CP during its lifecycle, the version number should be updated to v2.0, v3.0, etc.

- **Description of Problem/Issues** - mandatory completion by originator - a statement of the issue/problem.
- **Proposed Solution(s)** – mandatory completion by originator – this is a single fully defined description of the proposed solution. For Category 1 BSC Configurable Items redlined changes must be included.
- **Justification for Change** – mandatory completion by originator – details of the business case for implementing the proposed change. This section should also include a brief assessment of the risk associated with leaving the problem/issue unresolved, in terms of materiality and probability of occurrence.
- **To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?** – All CPs should be raised in line with BSC section F 3.1.2 ensuring that changes to BSC Configurable Items should continue to facilitate the provisions as detailed in the Code and should not impose new obligations or restrictions of a material nature on Parties and Party Agents (or classes thereof) which are not authorised or envisaged by, or subsidiary to, the rights and obligations of the Parties under the Code. As such the originator should highlight the section of the BSC that their proposed change is derived from and if the proposed CP facilitates the existing arrangements in the BSC.
- **Estimated Implementation Costs** – mandatory by BSCCo – These will be broken down into Central System Costs and BSCCo Operational Costs where appropriate.
- **Impact on BSC Configurable Item(s)** – mandatory completion by originator – a list of all BSC Configurable Items potentially affected by proposed solution. Details of how each BSC Configurable Item will be affected should be included, if known, and redlining of Category 1 BSC Configurable Items must be completed.
- **Impact on Core Industry Documents or System Operator – Transmission Owner Code** – mandatory completion by originator, however, BSCCo can advise if originator is unsure of all the impacts on documents – list of all documents potentially affected by proposed solution. These documents include any changes that will be needed to the DTC or other MRASCo Products. Details of how each document will be affected will also need to be included.
- **Requested Implementation Date and Associated Reasons** – mandatory by originator – identification of any critical milestone date(s) which need to be considered when generating possible solutions, with reasons for these. If change can be implemented at any time i.e. with no time constraints, this should be stated. This will be updated to the agreed Implementation Date once the Panel Committee has voted.
- **Version History** – mandatory completion by BSCCo – details of any previous versions of a Draft CP or details of what has changed between CP versions. If this is the first version then this will be indicated in this section.
- **Originator's Details** – mandatory by originator – the name, organisation, email address and telephone number of the originator and the date on which the originator raised the CP.