

CP Consultation

CP1597 'BSCP513 Text Change - Bulk Change of Agent'

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Committee

Supplier Volume Group (SVG)



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About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)¹.

The purpose of this Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1597. The SVG will then consider the consultation responses before making a decision on whether or not to approve CP1597.

There are four 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 SVGs initial views on the proposed changes.
- Attachment A contains the CP proposal form.
- Attachment(s) B contain(s) the proposed redlined changes to deliver the CP1597 solution.
- Attachment C 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.



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¹ <https://www.elexon.co.uk/glossary/?show=all>

1. Summary



Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes? Read section 1
- Have 15 minutes? Read sections 1, 4, 5 and 6
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments

Why change?

Recently, some unclear guidance was reported in BSC Procedure document [BSCP513 relating to Bulk Change of NHH Supplier Agent](#)² which conflicts with information in the Retail Energy Code (REC). BSCP513 Paragraph 1.1 states: 'For the avoidance of doubt, appointment of Supplier Volume Allocation (SVA) Meter Operator Agents (MOAs) is not in scope for this BSCP as these appointments will take place in accordance with the [Retail Energy Code \(REC\)](#)³ Metering Operations Schedule'.

However, [REC Schedule 14 Section](#)⁴ 11.2 states: 'For electricity bulk changes, the Energy Supplier shall submit a bulk change of agent application to the BSC Panel in accordance with BSCP513. Once the bulk change of agent application has been approved by the BSC Panel, the change of Metering Equipment Manager shall progress in accordance with this Paragraph 11'.

This created confusion as to how Suppliers should progress Bulk Changes of SVA Non-Half Hourly (NHH) MOA.

Solution

This CP proposes to remove references to NHH Agent roles, and the reference of excluding SVA NHH MOA appointments from BSCP513 to align with the Retail Energy Code (REC).

Impacts and costs

The proposed change will remove ambiguity from the Bulk Change of Agent (CoA) process and future-proof it for use throughout the MHHS transition.

This CP is proposed to be a document only change and the estimated central implementation costs for this CP will be approximately <£1,000.

Implementation

This CP is proposed for implementation on 7 November 2024 as part of the Standard November BSC Release.

² <https://bscdocs.elexon.co.uk/bsc-procedures/bscp513-bulk-change-of-nhh-supplier-agent>

³ <https://recportal.co.uk/recportal>

⁴ https://recportal.co.uk/rec-wiki-rec-documents/-/knowledge_base/rec-documents/rec-schedule-14-metering-operations

2. Why Change?

What is the issue?

Following [P436 Consequential BSC changes for Switching SCR \(REC 3.0\)](#)⁵, BSCP513 - BULK CHANGE OF NHH SUPPLIER AGENT was amended to explicitly exclude Bulk Changes of SVA NHH MOAs, with the stated reason that these appointments would take place in accordance with the 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.

Background

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 Supplier Meter Registration Agent (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.

⁵ <https://www.elexon.co.uk/mod-proposal/p436/>

3. Solution

Proposed solution

Remove references to NHH Agent roles from BSCP513, and remove the reference excluding SVA NHH MOA appointments.

Proposer's rationale

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.

CP Consultation Question

Do you agree with the CP1597 proposed solution?

Please provide your rationale.

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

Proposed redlining

The CP proposes to amend BSCP513 to align with REC. The redlining to support this change can be found in Attachment B.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1597 proposed solution?

If 'No', please provide your rationale.

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

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

The expected impact to BSC Party & Party Agents is a lessening of the Risk associated with Bulk Change of Agent activity, in particular the likelihood of a failure in SMRA and/or Electralink systems resulting from uncontrolled CoA activity.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Removal of ambiguity over when to follow Bulk CoA process; less risk of impact from other Supplier's consequent non-compliance with process
Supplier Agent	Less risk of impact from Supplier's consequent non-compliance with process
Licensed Distribution System Operator (LDSO)	Less risk of impact from Supplier's consequent non-compliance with process

Central impacts and costs

Central impacts

No BSC Agent Impacts expected.

The solution in this CP only affects BSC documentation. No BSC Central Systems or Agents will be impacted.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP513 - Bulk Change of NHH Supplier Agent	<ul style="list-style-type: none">None

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
The proposed Change positively impacts Settlement Risk (principally SVA Risk 014: Agent not appointed correctly, but also any other Risk related to the processing or transfer of data between Parties and Party Agents) by strengthening the controls around the Bulk CoA process.

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Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS

As of the latest draft, [BSCP708](#)⁶ makes clear that Parties should not undertake CoA activity during the MHHS Migration Period without first consulting the Migration Control Centre. However, BSCP513 as currently worded only includes only NHH Agent roles and will therefore not apply to the new trading arrangements.

In addition to removing the ambiguity present in the current arrangements, the proposed amendment also serves to pre-emptively close a loophole in the governance for the MHHS transition.

Central costs

The central implementation costs for this CP will be approximately <£1,000.

CP Consultation Question

Will CP1597 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 CP1597 and the CP1597 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 CP1597?

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 C

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5. Implementation Approach

Recommended Implementation Date

This CP is proposed for implementation on 7 November 2024 as part of the Standard November BSC Release.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1597?
Please provide your rationale.

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

6. Initial Committee Views

SVG's initial views

CP1597 was presented to the SVG 281/047 on 2 July 2024 and was recommended for progression.

A comment was received regarding CoA activity during MHHS Migration Period as stated in the CP Progression Paper. This was resolved by referencing the latest version of BSCP708 in the Progression Paper and the wording was amended slightly to make it clearer. No further comments were received.

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⁷ <https://www.elexon.co.uk/meeting/svg281/>