

## Modification Proposal

**MP No: 70**  
(mandatory by BSCCo)

**Title of Modification Proposal** (mandatory by proposer):

CMRS Metering For Inter-DNO Boundaries Within A GSP Group

**Submission Date** (mandatory by proposer): 01 March 2002

**Description of Proposed Modification** (mandatory by proposer):

The metering arrangements at Distribution System Connection Point (DSCP) (i.e. the boundary between two distribution networks) within the same GSP Group should be considered and treated in an exactly similar manner to the metering arrangements at a DSCP coincident with the boundary of two GSP Groups except for the sending of data into settlements SAA, i.e:

CMRS compliant metering should be installed & registered under BSCP20 by the majority importing party.

Aggregation Rules for the metering would be submitted by the Registrant under BSCP75, however the GSP Group Registrant (PDSO) would not include the DSCP within the GSP Group Aggregation Rules which would result in the data being excluded from Settlements.

The CDCA would perform their normal data collection, validation, MAR etc processes as per the industry rules and data would be sent to interested parties in the NDFC format (such as CDCA-I012, CDCA-I014 & CDCA-I030 files) in the normal manner by the appropriate Party, Central Agent or Part Agent.

The possibility of this modification was recognised by the DBFG in the preparation of P62 and also the subsequent P62 IWA. It is proposed this modification should be considered in parallel to P62. It is suggested that there may be a case for merging this modification with P62.

**Description of Issue or Defect that Modification Proposal Seeks to Address** (mandatory by proposer):

It is current practice to meter boundary points to distribution networks with industry standard metering arrangements whether at GSP, DSCP or customers premises (MPAN) - excepting permitted unmetered supplies which are accommodated on an estimated basis within MPANs. The introduction of multiple licensed distributors within a GSP Group, and the current BSC rules in K2.1 for placing meters in CMRS (i.e. not between Distribution Systems in the same GSP Group) would break this arrangement by leaving the metering arrangements at a DSCP outside of these industry standard metering arrangements. This modification seeks to address this by bringing metering at such points within the industry arrangement for Registration, Meter Operation, Data Collection and data provision to Parties.

1. Both of the DNOs will require metering at the boundary for their own operational network management purposes.
2. The stability and accuracy of settlements is of paramount importance to Suppliers and Elexon, requiring strong compliance in distribution (MPAN creation, disconnection and management), registration and metering agents. It is by no means clear what level of performance will develop in new distribution areas. CMRS registered boundary metering with publicly available CDCA collected data will enable Elexon and Suppliers to monitor the relative performance within all licensed Distributor boundaries and thereby ensure Applicable BSC Objectives are maintained in respect of quality of information entering Settlements.
3. The existing DNO will required metering for the purposes of billing - this is necessary if suppliers are to obtain their desired objective of receiving a single distribution bill from the "final" DNO to whom the end customer is connected and for robust derivation of new DNO line loss factors. This necessitates inter DNO metering.
4. Both DNOs will require metering in order to accurately perform the calculation of losses for the price control.

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Ofgem require a robust auditable process for this calculation.

5. There already exist standards & processes for metering equipment, registration, meter operation, data collection etc. It does not seem appropriate to have a different set for inter-DNO boundaries when CRA/CDCA have already indicated that they could manage this in CMRS without it effecting settlements.

**Impact on Code** *(optional by proposer):*

**Impact on Core Industry Documents** *(optional by proposer):*

**Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties** *(optional by proposer):*

No identified impact on BSC & Other relevant systems - the purpose of this modification is to require parties to utilise existing systems and process rather than creating new ones for particular circumstances.

**Impact on other Configurable Items** *(optional by proposer):*

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### **Justification for Proposed Modification with Reference to Applicable BSC Objectives** (mandatory by proposer):

Justification for Proposed Modification with Reference to Applicable BSC Objectives (mandatory by originator)

The proposed modification will better facilitate the achievement of the following BSC Objectives, (as are set out in paragraph 3 of Condition C3 of the Transmission Licence):

- "(c) Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity; and
- (d) Promoting efficiency in the implementation and administration of the balancing and settlement arrangements."

By (among other things):

The use of industry standard processes & systems already in place allowing for registration and configuration of such metering as well as data collection and distribution without additional development costs.

Provision and Monitoring of information that would enable Elexon, BSC Auditors, BSC Parties & Ofgem to audit the individual performance of both new and existing participants thus contribution to the overall quality of data entering Settlements.

Accurate derivation of new DNO line loss factors through access to data on consumption flowing into and out of its network.

Whilst BSC Objectives do not recognise DNO duties the proposed modification would have the effect of better facilitating those aspects of DNO activities that correspond to the activities identified for the Transmission Company under the following BSC Objectives:

- "(a) The efficient discharge by the Transmission Company of the obligations imposed under the Transmission Licence; and
- (b) The efficient, economic and co-ordinated operation by the Transmission Company of the Transmission System;"

By (among other things):

Operational network management within and between neighbouring DNOs.

To facilitate the billing of the existing DNO to the new embedded DNO for use of system thus enabling the new DNO to incorporate such charges in a composite invoice to suppliers & thereby reducing the need for separate use of system invoices to be created by each separate DNO and sent to for suppliers.

Finally the Solution will enable the submission of regulatory returns/accounts to Ofgem with no material degradation of accuracy.

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**Attachments:** NO

**If Yes, Title and No. of Pages of Each Attachment:**