# Draft MODIFICATION REPORT for Modification Proposal P213 'Facilitating Microgeneration (Optional Single MPAN)'

**Prepared by: ELEXON[1] on behalf of the BSC Panel**

| | | | |
|---|---|---|---|
| **Date of Issue:** | 15 August 2007 | **Document Reference:** | P213RR |
| **Reason for Issue:** | For Review | **Version Number:** | 0.4 |

This document has been distributed in accordance with Section F2.1.10 of the Balancing and Settlement Code.[2]

**Proposed Modification P213** seeks to amend the current provisions for Non Half Hourly (NHH) microgeneration[3] to allow a single MPAN[4] to be used for both Import and Export in Non Half Hourly Settlement. The aim of this modification is to reduce the associated industry costs and the complexity of Settlement processes for Suppliers and Supplier Agents, and thereby facilitate increased Settlement of microgeneration Export. Under the Proposed Modification, different Line Loss Factor Classes (LLFCs) could be assigned to the Import and Export for an Import/Export MPAN.

**Alternative Modification P213** seeks to implement the Proposed P213 Modification as the only method for the NHH settlement of microgeneration Export. The current two NHH MPAN solution introduced by P081 would be removed and participants would be required to register NHH Import and Export together under one MPAN. As for the Proposed Modification, this Alternative does not seek to remove the option of not settling microgeneration Export, or using a Half Hourly (HH) meter to settle Export. This Alternative Modification seeks to remove the complexity of the Settlement processes for MPANs moving between the P081 and P213 solutions.

## BSC PANEL'S RECOMMENDATIONS

Having considered and taken into due account the contents of the P213 draft Modification Report, the BSC Panel recommends:

- **that Proposed Modification P213 should not be made;**
- **that Alternative Modification P213 should not be made;**
- **an Implementation Date for Proposed Modification P213 of 06 November 2008 if an Authority decision is received on or before 08 November 2007, or of 05 November 2009 if an Authority decision is received after 08 November 2007 and before 05 May 2008;**
- **an Implementation Date for Alternative Modification P213 06 November 2008 if an Authority decision is received on or before 08 November 2007, or of 05 November 2009 if an Authority decision is received after 08 November 2007 and before 05 May 2008; and**
- **the proposed text for modifying the Code, as set out in the Modification Report.**

[1] ELEXON Ltd fulfils the role of the Balancing and Settlement Code Company ('BSCCo').
[2] The current version of the Code can be found at http://www.elexon.co.uk/bscrelateddocs/BSC/default.aspx
[3] The BSC Panel has set the capacity limit for settling generation using Non Half Hourly Meter readings to 30 kW.
[4] MPAN (Metering Point Administration Number) is the term referred to in the Master Registration Agreement (MRA), which identifies a SVA Metering System and Metering System Identifier, or MSID which is the term used under the BSC. For consistency with the term used in P213, this document shall use the term MPAN.

# CONTENTS TABLE

## SUMMARY OF IMPACTED PARTIES AND DOCUMENTS

As far as the Modification Group has been able to assess, the following parties/documents would be impacted by P213.

Please note that this table represents a summary of the full impact assessment results contained in Appendix 4.

| Parties | | Party Agents | | BSC Agents | | Other Agents | |
|---|---|---|---|---|---|---|---|
| Distribution System Operators | ☒ | Data Aggregators | ☒ | SAA | ☐ | Supplier Meter Registration Agent | ☒ |
| Generators | ☐ | Data Collectors | ☒ | FAA | ☐ | Unmetered Supplies Operator | ☐ |
| Interconnectors | ☐ | Meter Administrators | ☐ | BMRA | ☐ | Data Transfer Service Provider | ☐ |
| Licence Exemptable Generators | ☐ | Meter Operator Agents | ☒ | ECVAA | ☐ | | |
| Non-Physical Traders | ☐ | ECVNA | ☐ | CDCA | ☐ | | |
| Suppliers | ☒ | MVRNA | ☐ | TAA | ☐ | | |
| Transmission Company | ☐ | | | CRA | ☐ | | |
| | | | | SVAA | ☒ | | |
| | | | | Teleswitch Agent | ☐ | | |
| | | | | BSC Auditor | ☐ | | |
| | | | | Profile Administrator | ☐ | | |
| | | | | Certification Agent | ☐ | | |

| Sections of the BSC | | | |
|---|---|---|---|
| A | ☐ | H | ☐ |
| B | ☐ | I | ☐ |
| C | ☐ | J | ☐ |
| D | ☐ | K | ☐ |
| E | ☐ | L | ☐ |
| F | ☐ | M | ☐ |
| G | ☐ | N | ☐ |
| O | ☐ | R | ☐ |
| P | ☐ | S | ☒ |
| Q | ☐ | T | ☐ |
| U | ☐ | V | ☐ |
| W | ☐ | X | ☐ |

| Code Subsidiary Documents | | Core Industry Documents | | BSCCo | | BSC Panel/Panel Committees | | Other | |
|---|---|---|---|---|---|---|---|---|---|
| BSC Procedures | ☒ | Ancillary Services Agreement | ☐ | Internal Working Procedures | ☐ | Working Practices | ☐ | Market Index Data Provider | ☐ |
| Codes of Practice | ☐ | British Grid Systems Agreement | ☐ | | | | | Market Index Definition Statement | ☐ |
| BSC Service Descriptions | ☒ | Data Transfer Services Agreement | ☐ | | | | | System Operator-Transmission Owner Code | ☐ |
| Party Service Lines | ☐ | Distribution Code | ☐ | | | | | Transmission Licence | ☐ |
| Data Catalogues | ☒ | Distribution Connection and Use of System Agreement | ☐ | | | | | | |
| Communication Requirements Documents | ☐ | Grid Code | ☐ | | | | | | |
| Reporting Catalogue | ☒ | Master Registration Agreement | ☒ | | | | | | |
| | | Supplemental Agreements | ☐ | | | | | | |
| | | Use of Interconnector Agreement | ☐ | | | | | | |

# 1 DESCRIPTION OF MODIFICATION

This section outlines the solution for the Proposed Modification and Alternative Modification, as developed by the P213 Modification Group ('the Group') during the Assessment Procedure.

For a full description of the original Modification Proposal as submitted by E.ON UK ('the Proposer'), and the background to the proposal, please refer to the P213 Initial Written Assessment (IWA).

## 1.1 Proposed Modification

### 1.1.1 Use of a Single MPAN

P213 was raised on 27 April 2007 by E.ON UK ('the Proposer'). P213 seeks to remove the requirement to have two separate MPANs for NHH Import/Export sites, and to allow (where requested) NHH Import and NHH Export to be registered to a single MPAN. The intention of P213 is to reduce the complexity and cost of the associated industry processes and, in doing so, facilitate increased Settlement of microgeneration Export.

In practice this would mean that, for an existing MPAN, where a Supplier wishes to add microgeneration Export, the Supplier would not need to request an additional MPAN. Instead the Supplier would reconfigure the Metering System, and assign an Import/Export SSC (to replace the existing, Import only SSC). This reconfiguration request would trigger the Non Half Hourly Meter Operator Agent (NHHMOA) and Non Half Hourly Data Collector (NHHDC) to install Import/Export metering and collect meter readings as appropriate.

No change is proposed to the current physical metering requirements for these sites or the current requirement to measure Import and Export separately (on different registers). The Proposed Modification is intended to be an alternative option to (rather than replacing) the current processes introduced by P081 'Removal of the Requirement for Half Hourly Metering on Third Party Generators at Domestic Premises'.

### 1.1.2 Settlement Accuracy

In addition, P213 proposes that changes are made to the Settlement arrangements to ensure that profiling (and thereby Settlement), maintains the current level of accuracy for these Import/Export MPANs. This would be achieved by applying the current profile shapes (used for Import and Export MPANs) to joint Import/Export MPANs.

P213 notes that extending the profiling arrangements to single MPAN customers in this way would require profiles to be used in a different way to currently, in that:

- It would require profile coefficients from different Profile Classes to be assigned to different registers of the same Metering System. Currently Settlement always applies a single Profile Class (i.e. the one registered in SMRS) to all the registers of a Metering System; and
- It would require Settlement to attribute energy to both registers of a Metering System simultaneously. Currently the profiling rules are written on the premise that only a single register will be 'on' (i.e. recording the flow of energy) at a given point in time.

P213 proposes a mechanism for achieving this, which minimises the impact of P213 on Supplier Agents. The key features of this solution are as follows:

- The Import/Export MPAN would be registered in Supplier Meter Registration Service (SMRS) to the Import Profile Class (and a new special-purpose Import/Export SSC);
- Non Half Hourly Data Collector (NHHDC) and Non Half Hourly Data Aggregator (NHHDA) systems would treat this Import/Export SSC in the same way as other two-register SSCs; and
- The Supplier Volume Allocation Agent (SVAA) would not attempt to apply the normal profiling rules to Import/Export SSCs (as these profiling rules are not designed to handle two registers recording energy

 

simultaneously). Instead, SVAA would refer to a 'Substitution Table' which would refer to the correct profile coefficients to be used for each register. This Substitution Table would instruct SVAA to use a normal demand profile for the Import register, and a P081 Export profile for the Export register. The Substitution Table would be approved by the Panel in advance in accordance with existing rules for the approval of new SSCs.

## 1.2 Proposed Modification – Central Systems Detail

### 1.2.1 SVAA

P213 requires that MPANs registered as Import/Export are treated differently by the SVAA, to ensure that the same level of profile and Settlement accuracy is maintained for Import/Export MPANs (when compared to current Export and Import MPANs). P213 therefore looks to apply the current profile shapes to microgenerators with a single MPAN, as well as those with two MPANs.

#### *1.2.1.1 System Constraints*

In effect, this Modification Proposal is seeking to waive (for microgeneration customers) two constraints that are built into the design of the SVA market:

- that each SVA Metering System is assigned to a single Profile Class (built into SMRS and Supplier Agent systems); and
- that only one of the Time Pattern Regimes (TPRs) associated with a given SSC can be recording energy at a given instant in time (contained within the profiling component of SVAA).

#### *1.2.1.2 Changes to Overcome these Constraints for P213 Import/Export MPANs*

Rather than directly change these requirements (which is considered to be a significant change and therefore costly) P213 proposes that Annex S-2 of the BSC is amended to state that:

- The normal provisions for calculation of profile coefficients (i.e. sections 6.2 to 6.8 of Annex S-2) shall not apply to SSCs that include both Import and Export registers; and
- Instead, for these Import/Export SSCs, the profile coefficients for each TPR will be set equal to the profile coefficients that would have been used (in the opinion of the BSC Panel), had the Import and Export been assigned to two MPANs rather than one. In practice, this will be achieved by providing the SVAA system with a 'Substitution Table' detailing which profile coefficients to use for each TPR.
- The Substitution Table will be generated by SVAA and held within SVAA systems. When new Import /Export SSCs are defined, ELEXON will provide (after Panel approval) the values to be used for that SSC within the Substitution Table to SVAA.

The changes to systems and processes required to achieve this can be summarised as follows:

- Amendments are required to the profiling component of the SVAA system, so that profile coefficients for Import/Export SSCs are selected by reference to the Substitution Table. This requires a new value of the SSC Type flag to identify Import/Export SSCs. These changes are described in Appendix 4 of the P213 Assessment Report; and
- A process is required for providing the Substitution Table data to SVAA. The MDD data flows that will be used to send this information are the D0269 and D0270. This additional data would be provided to all participants to aid transparency, but would potentially impact all participant systems receiving the flows; and
- The meter reading processing carried out by NHHDCs should remain unchanged, with Import/Export Metering Systems handled in a similar way to any other multi-register Metering Systems. No changes are envisaged to the EAC/AA calculator (which will, in effect, use the Substitution Table data) used by the NHHDC or the NHHDA software; and

 

- All of the TPRs associated with a given SSC must have switching times defined in local time (i.e. GMT Indicator='N') or GMT (i.e. GMT Indicator='Y'). These cannot be mixed; and
- All of the TPRs associated with an SSC must be in the same Teleswitch Group as that SSC (or no Teleswitch Group, if the SSC is in no Teleswitch Group). This prevents teleswitched and non-teleswitched TPRs being combined into a single SSC.

### 1.2.2 MDD Data Flows

The data used by SVAA in the Substitution Table will be included in MDD data flows to provide a secure and tested method of updating the Substitution Table data. The publication of the Substitution Table data (via the MDD data flows) also seeks to provide transparency of the information used by SVAA.

Version 3 of D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set' data flows will be updated to include the SVAA Substitution Table information. It is noted that version 2 of the D0269 and D0270 will not be updated.

### 1.2.3 Market Domain Data Management

The data used in the Substitution Table would also be included in MDDM. MDDM software (and MDD data flows) would need to be updated (as described above in changes 1-3) to:

1. allow a third value of SSC Type (e.g. 'X'), for use with Import/Export SSCs;
2. allow the Export/Import flag to be assigned at a register level for type 'X' meters ; and
3. create a new table to hold the Substitution Table used by SVAA.

### 1.2.4 Line Loss Factor Classes

The Group agreed that LLFCs should also be included in the Substitution Table. This will allow the separate Import and Export LLFCs to be applied to the Import and Export on an Import/Export MPAN respectively. The Import LLFC would still be registered against the MPAN in SMRS as for any normal Import MPAN. This will be achieved by:

- including the additional Export LLFCs in the SVAA Substitution Table, with the Export Profile Class and relevant data. These values would then be used by SVAA in their calculations and would be updated, as with the other data items included in the table, via MDD.
- the substituted Profile Class, SSC and LLFC would also be reported on the D0030 'Non Half Hourly DUoS Report' and the D0082 'Supplier Purchase Matrix Report'. This would mean data shown on these reports is the same, irrespective of whether the Supplier chooses to settle NHH Export using separate MPANs for Import and Export or a single Import/Export MPAN and will aid Suppliers in reconciling their DUoS bills.

## 1.3 Proposed Modification – Party and Party Agent Detail

### 1.3.1 SMRS

Under the current BSC rules (P081 solution), the micro-generation customer would have two MPANs registered in SMRS, with associated data items as follows:

| P81 | Import MPAN | Export MPAN |
|---|---|---|
| Profile Class | 1 | 8 |
| LLFC | Import LLFC selected by Distributor | Export LLFC selected by Distributor |
| SSC | 0393 | 0482 |

Under P213 (Proposed or Alternative) the micro-generation customer would have a single MPAN registered as follows:

| P213 | Import/Export MPAN |
|---|---|
| Profile Class | 1 |
| LLFC | Import LLFC selected by Distributor |
| SSC | 0666 |

Although, SMRS will not include details of the SVAA Substitution Table, the SMRA could receive these details via the D0269 (v3) 'Market Domain Data Complete Set' and the D0270 (v3) 'Market Domain Data Incremental Set' data flows.

### 1.3.2 Supplier Agents

#### *1.3.2.1 NHH Meter Operator Agent*

The Meter Operator will be aware that the MPAN is Import/Export through looking at the Meter Technical Details (via the Measurement Quantity ID), where each register will be recorded as Import or Export.

Meter Operator Agents would be able to receive the full set of Substitution Table data via the D0269 (v3) 'Market Domain Data Complete Set' and the D0270 (v3) 'Market Domain Data Incremental Set' data flows.

This Modification seeks to facilitate the use of either two separate meters (one for Export and another for Import) or a single meter (for both Import and Export) under the single MPAN solution.

#### *1.3.2.2 NHH Data Collection and NHH Data Aggregation Agents*

Under P213 (Proposed or Alternative), the data collection and data aggregation processes remain largely unchanged. Meter reads will be collected as normal, with both the Import and the Export registers being read at the same time. The physical meter advances are assigned to the correct Time Pattern Regimes, and converted to Annualised Advances using the Daily Profile Coefficient data provided by SVAA for the appropriate GSP Group, Profile Class, Standard Settlement Configuration and Time Pattern Regime. These Annualised Advances are then passed to the NHHDA, who uses them to construct the cells of the Supplier Purchase Matrix (SPM) in exactly the same way as for any other MPAN. No change is proposed to the NHHDA or EAC/AA systems (or the software provided by ELEXON to these agents).

In all cases, the SPM cell provided to SVAA will reflect the Metering System details registered in SMRS.

The information included in the SVAA Substitution Table will be included in the D0269 v3 and D0270 v3 data flows. It is noted that NHHDA currently receives v2 of these flows. It is not proposed that this would be updated, as NHHDAs will not need the additional data provided in the Substitution Table.

### 1.3.3 Suppliers

As P213 Proposed Modification is an optional single MPAN solution, in addition to the existing two MPAN solution under P081, it does not require Suppliers to convert current microgeneration sites that are using the existing P081 arrangements, or to set up all new microgeneration sites under the P213 arrangements (as they may continue to use the current arrangements). However, through the Change of Supplier Process, Suppliers may find that they have an Import/Export MPAN. Therefore, P213 requires that Suppliers are able to accommodate this scenario. It is noted that a Supplier may choose to convert a single MPAN microgeneration site to a two MPAN microgeneration site, once they have taken the MPAN on, or choose not to settle the Export.

The information included in the SVAA Substitution Table will be included in the D0269 v3 and D0270 v3 data flows.

### 1.3.4 Licensed Distribution System Operators (LDSOs)

P213 requires that LDSOs are able to manage Import/Export MPANs within their systems. The information included in the SVAA Substitution Table will be included in the D0269 v3 and D0270 v3 data flows.

The proposed solution would allow LDSOs to use different LLFCs for Import and Export on a single MPAN (through the use of the Substitution Table, with the Import LLFC assigned to the MPAN in SMRS and the Export LLFC included in the Substitution Table), and ensures that the correct values are included in the D0030 'Non Half Hourly DUoS Report'. More detail on how different LLFCs could be applied is included in section 1.2.4.

## 1.4 Proposed Modification – New Processes Detail

P213 will require several new processes to describe how registration, Change of Supplier and disconnection will work for Import/Export MPANs in a variety of different likely scenarios (e.g. a change from a two MPAN solution (P081) to a single MPAN (P213) solution with Change of Supplier).

A list of these new processes is included below, together with an estimate of the level of additional complexity associated with the new process (the P081 two MPAN solution for microgeneration is taken as the baseline for this comparison). Further details of the likely scenarios for each of the processes for Registration and Change of Supplier described below are included in Appendix 3 of the P213 Assessment Report. Each of the processes described in the below table will be set out in the relevant BSCP.

| New P213 Process | Level of Additional Complexity |
|---|---|
| Registration of an Import/Export MPAN | |
| An existing Supplier wishes to use a single MPAN for Import and Export on a site with 2 separate MPANs (one for Export and another for Import) | MEDIUM |
| The existing Supplier adds Export to an Import only site | MEDIUM |
| The existing Supplier discontinues the Settlement of Microgeneration Export | MEDIUM |
| Processes for Change of Supplier | |
| Change of Supplier Process (Import and Export from 2 MPANs to 1 MPAN) | HIGH |
| Change of Supplier Process (Import and Export from 1 MPAN to 2 MPANs) | HIGH |
| Change of Supplier Process (new Supplier takes on Import or Export only where Import and Export both registered) | HIGH |
| Change of Supplier Process (for an Import only site, which is being converted to Import/Export) | MEDIUM |
| Change of Supplier Process (for an Import/Export site, which is being converted to Import) | MEDIUM |
| Population of Substitution Table data | |
| When new Import/Export SSCs are approved, ELEXON will confirm the Substitution Table data to be used by SVAA for that SSC (following Panel approval) | LOW |

## 1.5 Alternative Modification

An Alternative Modification has been considered by the Group. The Alternative Modification is the same as the Proposed Modification solution except that, under the Alternative, the two MPAN option (brought in by P081) would no longer be available to Parties for settling Non Half Hourly Export; so the P213 process would be the only arrangement available to Parties to settle Non Half Hourly Export. A Party could, however, use a Half Hourly Metering solution to settle the Export separately, or choose not to settle the Export at all.

The Group noted that the Alternative would also require a one-off migration exercise for those sites which are currently registered in Settlement under a separate Export MPAN. The number of MPANs to be migrated is dependent on the take up of the existing 2 MPAN solution prior to the implementation of P213. Currently only 25 MPANs are registered in settlement as Non Half Hourly Export.

# 2 AREAS RAISED BY THE TERMS OF REFERENCE

The following areas were considered by the Modification Group during the Assessment Procedure for P213:

- Master Registration Agreement (MRA) Interaction
- Further changes not described in the Modification Proposal
- Assessment of the Microgeneration processes in the CSDs (for the Proposed and Alternative Modifications)
- Possible alternatives to the settlement accuracy solution proposed in P213
- Potential P213 Alternatives considered
- Potential impact on GSP Group Correction Factor
- Benefits/costs of the Proposed and Alternative Modifications
- Central System impacts and participant system/process impacts

These issues are discussed in the Assessment Report contained in Appendix 3, and are not covered further here.

# 3 IMPLEMENTATION APPROACH AND COSTS

## 3.1 Proposed Modification

**PROPOSED OR ALTERNATIVE MODIFICATION IMPLEMENTATION COSTS[5]**

| | Cost | Tolerance |
|---|---|---|
| **Total Service Provider Cost[6]** | £ 314,440 | +/- 20% |
| **ELEXON Implementation Resource Cost** | 248 man days<br>£54,560 | +/- 10% |

[5] An explanation of the cost terms used in this section can be found on the BSC Website at the following link: http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

[6] All Cap Gemini and Logica costs to implement P213 or P213 Alternative

| | | |
|---|---|---|
| **Total Implementation Cost** | £ 369,000 | +/- 20% |

## PROPOSED OR ALTERNATIVE MODIFICATION ONGOING SUPPORT AND MAINTENANCE COSTS

| | Stand Alone Cost | Tolerance |
|---|---|---|
| Service Provider Operation Cost – dependent on the number of changes to the data held in the SVAA Substitution Table. | | |
| 0-20 changes to the SVAA Substitution Table | £0 | +/- 0% |
| 21-30 | £87 | +/- 0% |
| 31-40 | £147 | +/- 0% |
| Each further set of 10 changes | a further £87 | +/- 0% |
| Service Provider Maintenance Cost | N/A | N/A |
| ELEXON Operational Cost | N/A | N/A |

### a) BSC Agent Impact

**SVAA -** the changes required to systems and processes required to achieve this can be summarised as follows:

- Amendments are required to the profiling component of the SVAA system, so that profile coefficients for Import/Export SSCs are selected by reference to the Substitution Table. This requires a new value of the SSC Type flag to identify Import/Export SSCs; and
- A process is required for providing the Substitution Table to SVAA. The MDD data flows that will be used to send this information are the D0269 and D0270. This additional data would be provided to all participants to aid transparency, but would potentially impact all participant systems receiving the flows; and
- The meter reading processing carried out by NHHDCs should remain unchanged, with Import/Export Metering Systems handled in a similar way to any other multi-register Metering System. No changes are envisaged to the EAC/AA calculator used by the NHHDC or the NHHDA software; and
- all of the TPRs associated with a given SSC must have switching times defined in local time (i.e. GMT Indicator='N') or GMT (i.e. GMT Indicator='Y'). These cannot be mixed; and
- all of the TPRs associated with an SSC must be in the same Teleswitch Group as that SSC (or no Teleswitch Group, if the SSC is in no Teleswitch Group). This prevents teleswitched and non-teleswitched TPRs being combined into a single SSC.

**MDD Data Flows -** Version 3 of D0269 'Market Domain Data Complete Set' and D0270 'Market Domain Data Incremental Set' data flows will be updated to include the SVAA Substitution Table information. It is noted that version 2 of the D0269 and D0270 will not be updated.

**MDDM** - the data used in the Substitution Table would also be included in MDDM. MDDM software (and MDD data flows) would need to be updated (as described above in changes 1-3) to:

- allow a third value of SSC Type (e.g. 'X'), for use with Import/Export SSCs;
- allow the Export/Import flag to be assigned at a register level for type 'X' meters ; and
- create a new table to hold the Substitution Table used by SVAA.

**LLFCs -** changes to allow the separate LLFCs to be applied to the Import and Export on an Import/Export MPAN will be achieved by:

- including the additional Export LLFCs in the SVAA Substitution Table (with the Export Profile Class, etc). These values would then be used by SVAA in their calculations and would be updated, as with the other data items included in the table, via MDD; and
- the substituted Profile Class, SSC and LLFC would also be reported on the D0030 'Non Half Hourly DUoS Report' and the D0082 'Supplier Purchase Matrix Report'. This would mean data shown on these reports is the same, irrespective of whether the Supplier chooses to settle NHH Export using separate MPANs for Import and Export or a single Import/Export MPAN and will aid Suppliers in reconciling their DUoS bills.

A more detailed list of impacts on Central Systems is available in the full Impact Assessments provided by Logica and Cap Gemini, which are available on the P213 page of the ELEXON website.

### b) BSC Party and Party Agent Impact

The change to version 3 of the MDD data flows could impact Supplier, Supplier Agents (NHH and HH), LDSO and SMRA processes and systems, depending on how individual participants process the MDD files.

Suppliers will be impacted by the Proposed Modification, as they will need to be able take on (through the Change of Supplier processes) both P081 and P213 type MPANs. Suppliers currently operating the P081 process will be more significantly impacted by the Alternative Modification as existing Export sites which are included in settlement will need to be migrated over onto P213 MPANs.

NHH Supplier Agents (particularly Meter Operators) may need to update their systems and will need to update their processes for identifying collecting, recording and aggregating Import and Export data from a single MPAN.

LDSOs will be impacted by the Proposed Modification as they will need to accept new SSCs for Import/ Export MPANs and assign the correct LLFCs.

It is noted that SMRS and hence the Electricity Central Online Enquiry Service (ECOES) will not reflect the 'correct' information held at SVAA in the Substitution Table (e.g. where there are different LLFCs for Import and Export on an Import/Export MPAN). SMRS will hold the single Import/Export SSC as described in section 1.3.1.

A more detailed list of the impacts noted by Parties and Party Agents is available in Appendix 9 of the Assessment Report.

### c) Transmission Company Impact

No impact.

 

**d) BSCCo Impact**

ELEXON indicated that 1 month would be required following the receipt of the updated SVAA and MDDM systems to undertake final testing.

CSD documentation will need to be updated to include new sections describing the revised processes, a walk through of these new processes is also recommended as part of the implementation of P213.

Including documentation updates, testing, walk-through and release overheads 248 man days are required to implement P213 (Proposed or Alternative) at a cost of approximately £54,560.

A more detailed list of impacts on BSCCo is available in the full impact Assessments, available on the P213 page of the ELEXON website.

## 3.2 Alternative Modification

### 3.2.1 Central Systems and BSCCo

It is noted that the Central Systems impacts will be the same for both the Proposed and Alternative Modifications.

### 3.2.2 Parties and Party Agents

In addition to the Impacts noted for the Proposed Modification, participants would need to undertake a migration exercise to convert the existing 'P081' MPANs to P213 joint Import/Export MPANs.

# 4 RATIONALE FOR MODIFICATION GROUP'S RECOMMENDATIONS TO THE PANEL

This section summarises the recommendations of the Modification Group, as detailed in the Assessment Report in Appendix 3.

## 4.1 Assessment of Proposed Modification Against Applicable BSC Objectives

### 4.1.1 Modification Group's Initial Discussions

The Modification Group initial views were **SPLIT** as to whether the Proposed Modification would better facilitate the achievement of Applicable BSC Objectives (c) and (d) when compared to the current Code baseline, for the following reasons:

**Applicable BSC Objective (c)**

Those that felt the Proposed Modification did better facilitate competition made the following arguments:

- it gives Suppliers the opportunity to reduce transaction costs associated with registering and collecting/processing data from Meters recording the Export from microgeneration. Reducing these transaction costs would have a positive impact on competition in the purchase of electricity from microgeneration which will, in turn, will lead to increased competition in the installation and production of electricity from microgeneration; allowing such generation to compete more effectively;
- ensures the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome;

 

- a single MPAN solution under P213 would provide a more efficient approach to the treatment of microgeneration, however care would need to be taken if significantly more sites were to be registered in Settlements;
- it would make it easier for Suppliers to register microgeneration in Settlements; and
- one member felt that, in principle, P213 should facilitate competition in the area of microgeneration; however, they noted the complexity/data quality issues raised in the Group's consideration of the various scenarios. Problems could arise if participants did not adhere to the processes set out in Appendix 3.

Those that felt the Proposed Modification did not better facilitate competition made the following arguments:

- that having two processes for settling NHH Export complicated the arrangements for participants.

**Applicable BSC Objective (d)**

Those that felt the Proposed Modification did improve efficiency made the following arguments:

- the streamlining of processes associated with the collection and processing of data from microgeneration will reduce the potential for errors to occur leading to improved efficiency in the implementation and administration of the Balancing and Settlement arrangements.

Those that felt the Proposed Modification did not improve efficiency made the following arguments:

- that having two options for settling NHH Export unduly complicated the Settlement processes and would make them less efficient;
- under the Proposed Modification, in scenario 5 (where the new Supplier wishes to convert a P081 2 MPAN to a P213 1 MPAN) the Supplier would need to register both MPANs as a P081 set-up first and then move then to a P213 solution, so Supplier systems would need to be able to cope with P081 as well as P213; and so this proposal does not avoid the problem where a Supplier might want to just change his systems to cater for P213 and not for P081;
- one member felt that the proposal only addressed the belief the administrative costs associated with having a second MPAN are deterring Suppliers from settling a greater number of Export sites and that this assumption had not been proven; and
- the additional complexity of the Change of Supplier process could lead to data quality issues which would require additional resource to resolve any central issues.

**Applicable Objectives (a) and (b)**

The majority of the Group agreed that the Proposed Modification would have a neutral impact on Applicable BSC Objectives (a) and (b). However, one member felt you may be able to construct an argument in relation to better facilitating objective (b); as, if the System Operator had increased metered Export data for microgeneration (rather than the energy simply spilling and distorting the Group Correction Factor) this might have advantages for System Operation.

### 4.1.2 Views of Respondents to Assessment Procedure Consultation

The **(SLIGHT) MAJORITY** view of respondents to the Assessment Procedure consultation was that the Proposed Modification **WOULD** better facilitate the achievement of **Applicable BSC Objectives (c) and (d)**.

The views expressed by respondents were similar to the initial views of the Group above. In addition to reasoning described in section 4.1.1, the following rationale was provided:

**Applicable BSC Objective (c)**

 

Those that felt the Proposed Modification did better facilitate competition made the following arguments:

- there are very few NHH export sites currently registered under P081. They agreed with the Proposer that a possible cause for the low numbers is that the current 2 MPAN solution adds an administrative cost that may outweigh the benefits of registering the export. Giving Suppliers the option to register both Import and Export on a single MPAN provides an opportunity for these costs to be reduced and would make it more likely that Export would be registered thus increasing competition; and
- that P213 would better achieve the BSC Objectives, as it would ensure smoother transfer between parties for Import/Export Metering Systems.

**Applicable BSC Objective (d)**

Those that felt the Proposed Modification did not improve efficiency made the following arguments that:

- P213 does not offer a coherent approach to Import/Export sites and would move away from the tried and tested 'one MPAN for Import and one MPAN for Export' already used in the NHH and HH Markets;
- the proposed arrangements for calculating the profiled flow would introduce unnecessary complexity and potential for error; and
- P213 will create significantly more SSCs, and that this increase, will in itself pose an increased risk to settlement.

### 4.1.3 Modification Group's Assessment

The **MAJORITY** view of the Modification Group was that the Proposed Modification **WOULD NOT** better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared to the current Code baseline, for the following reasons:

**Applicable BSC Objective (c)**

Those that felt the Proposed Modification did not better facilitate competition made the following key arguments:

- that there was little evidence to show that P213 will be used more widely than P081; and
- that the additional complexity would not aid competition, as the three options (not registering Export, registering Export on an Export only MPAN, or registering it on a joint Import/Export MPAN) would simply cause confusion and cause additional costs for Suppliers.

The Group member who felt the Proposed Modification did better facilitate competition made the following arguments:

- it gives Suppliers the opportunity to reduce transaction costs associated with registering and collecting/processing data from Meters recording the Export from microgeneration. Reducing these transaction costs would have a positive impact on competition in the purchase of electricity from microgeneration which will, in turn, lead to increased competition in the installation and production of electricity from microgeneration; allowing such generation to compete more effectively; and
- ensures the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome.

**Applicable BSC Objective (d)**

Those that felt the Proposed Modification did not improve efficiency made the following key arguments:

 

- that the processes required by P213 were significantly complex and presented a real risk to data quality, in particular when relying on the customer to provide accurate and timely information to the new Supplier;
- that having two options for settling NHH Export unduly complicated the Settlement processes and would make them less efficient;
- under the Proposed Modification, in scenario 5 (where the new Supplier wishes to convert a P081 two MPAN to a P213 single MPAN) the Supplier would need to register both MPANs as a P081 set-up first and then move then to a P213 solution, so Supplier systems would need to be able to cope with P081 as well as P213; and so this proposal does not avoid the problem where a Supplier might want to just change his systems to cater for P213 and not for P081; and
- one member felt that the proposal only addressed the belief the administrative costs associated with having a second MPAN are deterring Suppliers from settling a greater number of Export sites and that this assumption had not been proven.

The Group member who felt the Proposed Modification did improve efficiency made the following arguments:

- the streamlining of processes associated with the collection and processing of data from microgeneration will reduce the potential for errors to occur leading to improved efficiency in the implementation and administration of the Balancing and Settlement arrangements.

**Applicable BSC Objectives (a) and (b)**

The Group agreed that the Proposed Modification would have a neutral impact on the Applicable BSC Objectives (a) and (b).

## 4.2 Assessment of Alternative Modification Against Applicable BSC Objectives

### 4.2.1 Modification Group's Initial Discussions

The initial **MAJORITY** view of the Modification Group was that the Alternative Modification **WOULD** better facilitate the achievement of Applicable BSC Objectives (c) and (d) when compared to the Proposed Modification and the current baseline. The same reasons were provided as in favour of the Proposed Modification, save for the following further comments:

**Applicable BSC Objective (c)**

Those that felt the Alternative Modification did better facilitate competition made the following further arguments:

- a single process for settling NHH Export would make the arrangements simpler and more efficient for participants to use;
- it would reduce any barriers to register microgeneration in Settlement and may lead to increased registration of microgeneration;
- offered a pragmatic solution to the Settlement of microgeneration over the 'theoretical pure' solution in the Proposed Modification; and
- reduce the potential introduction of data quality issues due to the complexity of the Proposed Modification and reduce the risk of incorrect registrations within the Settlement processes.

Those that felt the Alternative Modification did not better facilitate competition made the following arguments:

 

- that removing the capability for separate NHH Import and Export reduces the opportunities for competition. Customers could no longer seek potentially competitive prices for separate Export and Import as they would be required to utilise a HH solution for their Export.
- One member felt on balance the Alternative did better facilitate BSC objective (c) due to simpler approach but was concerned with regards to the restriction in competition from a solution as customers would not be able to chose different Suppliers for NHH Import and NHH Export.

**Applicable BSC Objective (d)**

Those that felt the Alternative Modification did improve efficiency made the following arguments:

- that having one process for settling NHH Export makes them more efficient and the changes less costly; and
- would lead to less data quality issues than the Proposed Modification, thereby a reduction in administration resource to resolve these issues.

**Applicable Objectives (a) and (b)**

The majority of the Group agreed that the Alternative Modification would have a neutral impact on Applicable BSC Objectives (a) and (b). However, one member felt that it is possible to construct an argument in relation to objective (b) as per the Proposed Modification.

### 4.2.2 Views of Respondents to Assessment Procedure Consultation

The **MAJORITY** view of respondents to the Assessment Procedure consultation was that the Alternative Modification **WOULD NOT** better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared to the current baseline.

The respondents views were **SPLIT** as to whether the Proposed Modification would better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared to the Proposed Modification.

The views expressed by respondents were similar to the initial views of the Group. In addition to reasoning described in section 4.2.1, the following reasoning was provided:

**Applicable BSC Objective (c)**

Those that felt the Alternative Modification did not better facilitate competition made the following further arguments:

- that P213 Alternative totally goes against the Government's and Industry's drive to facilitate micro-generation as you would not be able to buy electricity from one Supplier and sell excess electricity back to another, different Supplier;
- that P213 Alternative would remove the option of registering the Import and Export MPANs separately with different Suppliers altogether and therefore reduces consumer choice; and
- that, if P213 were made the only option for settling microgeneration, it could potentially dissuade Parties who have already invested in the P081 solution from settling any more microgeneration sites. It could be argued that mandating P213 would unfairly benefit those Parties who have failed to implement the existing arrangements (P081), and penalise those Parties who have already invested in P081.

Those that felt the Alternative Modification did better facilitate competition made the following arguments:

- that removing the option for customers to have a separate supplier for Import and Export would not have a material adverse impact on competition because it is unlikely that Suppliers will offer more attractive tariffs under the dual MPAN route (at least not for the smaller customers).

 

**Applicable BSC Objective (d)**

Those that felt the Alternative Modification did not improve efficiency made the following arguments:

- that introducing P213 Alternative could prevent any data going through settlements due to the complexity of having two SSC/LLFC's on one MPAN.

Those that felt the Alternative Modification did improve efficiency made the following arguments:

- that it is a simpler and more streamlined solution that would increase competition when compared to both the current and P213 solution;
- that maintaining both options does not reduce complexity of settlements. P213 was requested due to issues with P081 process, so the retention of the P081 process will not eliminate those problems;
- overall, the benefits of using a single MPAN are likely to outweigh the additional complications in managing the data Substitution Table and the additional number of SSCs that are required.

### 4.2.3 Modification Group's Conclusions

#### *4.2.3.1 Alternative Modification Compared to the Proposed Modification*

The **MAJORITY** view of the Modification Group was that the Alternative Modification **WOULD** better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared to the Proposed Modification.

**Applicable BSC Objective (c)**

Those that felt the Alternative Modification did better facilitate competition (when compared to the Proposed Modification) made the following key arguments:

- that removing the option for customers to have a separate Supplier for Import and Export would not have a material adverse impact on competition because it is unlikely that Suppliers will offer more attractive tariffs under the dual MPAN route (at least not for the smaller customers).

Those that felt the Alternative Modification did not better facilitate competition (when compared to the Proposed Modification) made the following key arguments:

- that, if P213 were made the only option for settling microgeneration, it could potentially dissuade Parties who have already invested in the P081 solution from settling any more microgeneration sites; and
- it could be argued that mandating P213 would unfairly benefit those Parties who have failed to implement the existing arrangements (P081), and penalise those Parties who have already invested in P081.

**Applicable BSC Objective (d)**

Those that felt the Alternative Modification did improve efficiency (when compared to the Proposed Modification) made the following arguments:

- a single process for settling NHH Export would make the arrangements simpler and more efficient for participants to use; and
- reduce the potential introduction of data quality issues due to the complexity of the Proposed Modification and reduce the risk of incorrect registrations within the Settlement processes.

**Applicable BSC Objectives (a) and (b)**

The Group agreed that the Alternative Modification would have a neutral impact on Applicable BSC Objectives (a) and (b).

 

#### *4.2.3.2 Alternative Modification Compared to the Baseline*

The **MAJORITY** view of the Modification Group was that the Alternative Modification **WOULD NOT** better facilitate the achievement of **Applicable BSC Objectives (c) and (d)** when compared to the current baseline.

**Applicable BSC Objective (c)**

Those that felt the Alternative Modification did not better facilitate competition made the following key arguments that:

- if P213 were made the only option for settling microgeneration, it could potentially dissuade Parties who have already invested in the P081 solution from settling any more microgeneration sites in the short term; and
- P213 is an expensive solution for what is currently a very small market and that it might be more cost effective to look at improving P081.

The Modification Group member that felt the Alternative Modification did better facilitate competition made the following key arguments:

- it gives Suppliers the opportunity to reduce transaction costs associated with registering and collecting/processing data from Meters recording the Export from microgeneration. Reducing these transaction costs would have a positive impact on competition in the purchase of electricity from microgeneration which will, in turn, will lead to increased competition in the installation and production of electricity from microgeneration; allowing such generation to compete more effectively; and
- ensures the accuracy of profiling arrangements is not compromised if changes are implemented under other industry documents to facilitate this outcome.

**Applicable BSC Objective (d)**

The Modification Group Member that felt the Alternative Modification did improve efficiency made the following argument:

- the streamlining of processes associated with the collection and processing of data from microgeneration will reduce the potential for errors to occur leading to improved efficiency in the implementation and administration of the Balancing and Settlement arrangements.

**Applicable BSC Objectives (a) and (b)**

The Group agreed that the Alternative Modification would have a neutral impact on Applicable BSC Objectives (a) and (b).

## 4.3 Implementation Date

The Modification Group agreed the following recommended implementation approach for P213:

- An Implementation Date for the Proposed Modification of 05 November 2009 (provided that an Authority decision is received on or before 05 May 2008)
- An Implementation Date for the Alternative Modification of 05 November 2009 (provided that an Authority decision is received on or before 05 May 2008)

The Group noted that the time needed to implement and test the required Central Systems changes was 32 weeks. The majority of Parties and Party Agents indicated that at least 12 months is needed to implement P213 (Proposed or Alternative) with two Suppliers indicating that at least 18 months was needed and one Supplier advising that 24 months was needed.

The second Assessment Consultation included a question as to whether, due to the importance of microgeneration, the implementation of P213 should be outside a scheduled release. Only one participant supported a release outside the scheduled release strategy. The Modification Group agreed with the majority of respondents that there was little justification for implementing P213 outside a scheduled release as the microgeneration market is currently very small and there is already a mechanism for settling microgeneration Export.

The Group noted that, due to ISIS, the scope of the June 2009 SVA release would be limited.

The Group confirmed that they believed the CSD documentation should be drafted early in implementation to provide certainty on the final text. The Group agreed that some participants would not wish to start implementing P213 until this drafting was finalised. The Group agreed that 18 months following an Authority decision should be allowed for participants to implement the changes (this would allow for ELEXON to draft and seek committee approval of the CSDs and give participants approximately twelve months to implement with foresight of the CSDs).

This Modification Proposal would be implemented such that Settlement systems and processes are capable of supporting an Import/Export MPAN from the implementation date of the Modification.

The Group noted that for P213 Alternative, a migration exercise will be needed following the implementation of P213 Alternative. The Group agreed that the speed of the migration should be determined by the total number of NHH Export MPANs at the time of migration as, while 25 MPANs could be migrated quite quickly, there would be a greater risk if several hundred were to be migrated on a single day.

Therefore, the Group agreed that if there are less than 100 P081 MPANs to be migrated, then they should be migrated in one month. If more than 100 P081 MPANs exist on the implementation date then an additional month should be added for every additional 500 P081 MPANs.

## 4.4 Legal Text

The Modification Group walked through the Legal text and agreed that it delivers the solution developed by the Group.

The Group noted that the BSC does not currently state that Suppliers may have two MSIDs (referred to as MPANs within this document and under the MRA), one for Import and one for Export. This is because such rules fall outside the BSC and are only contained in the MRA. As a consequence, the changes required to the BSC in respect of the Proposed and Alternative solutions are limited to changes to the Profile Coefficients and Line Loss Factor Class as they are the only items that are impacted and which are also set out in the BSC. The Group also noted that Suppliers will not be able to utilise the solutions without the appropriate changes to the MRA.

A copy of the draft legal text can be found in Appendix 1.

### 4.4.1 Proposed Solution – Summary of the Changes Included in the Legal Text

#### *4.4.1.1 Profile Coefficients*

Changes are made to Annex S-2 (6.6.1 and 6.7.1) to require the use of the Substitution Table for Import/Export MPANs.

An additional paragraph (6.7.1.A) is also added to Annex S-2 which sets out the algebra to be used for Import/Export MPANs, and allows the Substitution Table to be used for these MPANs.

Newly defined terms have been added to Annex X-1 and X-2.

 

#### *4.4.1.2 Line Loss Factor Classes*

Changes are made to Annex S-2 (paragraph 8.1.4) to allow the Export LLFC to be included in the Substitution Table, and a new definition is added to Annex X-2.

#### *4.4.1.3 Metering Point*

Minor changes are made to update the definition of Metering Point in Annex X-2 to correct the reference to the MRA (Schedule 9 is updated to Schedule 8) and minor wording changes are made to ensure that it is clear that a Metering Point may relate to supply (Import) and/or demand (Export).

### 4.4.2 Alternative Solution – Summary of the Changes Included in the Legal Text

The Modification Group noted that Suppliers will not be able to utilise the Alternative Solution without the equivalent changes to the MRA, the changes needed to the MRA are described in more detail in Appendix 5 of the P213 Assessment Report. It is noted that if this Modification (P213 Alternative) were to made without a change to the MRA then the MRA and BSC would be inconsistent; and participants would be non compliant with either the MRA or BSC by settling NHH Export and Import on a single MPAN or 2 MPANs (respectively).

Changes are made as for the Proposed Modification described above in section 4.4.1. In addition the following change is required.

#### *4.4.2.1 Metering Equipment*

Changes are made to Section L (paragraph 2.2.1) to make it expressly clear that NHH Export must be recorded with NHH Import on a single SVA Metering System; otherwise the Export must be recorded as Half Hourly.

The Group noted that a single SVA Metering System must correspond to a single MSID as set out in Section K of the BSC.

In addition, the Group noted that no changes are needed to Section K paragraph 1.6.1 as this already provides for a P213 environment.

# 5 RATIONALE FOR PANEL'S RECOMMENDATIONS TO THE AUTHORITY

## 5.1 Panel's Consideration of Assessment Report

The Panel considered the P213 Assessment Report at its meeting on 09 August 2007. This section summarises the Panel's discussions in formulating its provisional recommendation for inclusion in the draft Modification Report. Details of the Report Phase consultation responses, the Panel's discussion of the responses and its final recommendation to the Authority can be found in Sections 5.2, 5.3 and 5.4 respectively.

### 5.1.1 Assessment Procedure Consultation Responses

The Panel noted the wide range of views expressed in the consultation responses and the high number of responses; and expressed concern regarding the high costs, wide ranging impacts and long implementation timescales noted by industry participants, questioning whether these were overly generous.

One Panel member noted that the current processes for NHH microgeneration Export are managed manually by their organisation, and that this was probably part of the reason for the high investment costs. It was noted that the commercial tipping point for automating processes would invariably be brought forward by the Proposed Modification if approved. The Panel were keen to understand a little more detail from respondents as to the costs and timescales quoted and agreed to seek further clarification in the Report Phase Consultation.

 

The Panel noted a desire by some of the consultation respondents to look at the existing processes for microgeneration to establish if any changes could be made to improve the existing arrangements. The Panel agreed that the SVG should be asked to look at the current arrangements set out in the BSCPs to see if improvements can be made as part of an 'issue'.

The Panel complemented the P213 Modification Group on their hard work in developing a solution to allow the P213 proposal to work.

A link to the full P213 Assessment Report is available in Appendix 3.

### 5.1.2 Applicable BSC Objectives

#### a) Proposed Modification

The majority provisional view of the Panel was that the Proposed Modification would not better facilitate the achievement of Applicable BSC Objective (d) when compared to the current Code baseline, for the following reasons:

- The majority of Panel members felt that the increase complexity in microgeneration processes that would be introduced by the Proposed Modification (through the use of the Substitution Table, the increase in the number of SSCs and the new Change of Supplier processes needed) would create an increased risk of settlement error, and that this meant that P213 would be less efficient than the current arrangements; and
- Several Panel members noted that they felt that there had not been sufficient evidence presented to show that the current arrangements were fundamentally broken or preventing the settlement of microgeneration.

One Panel member felt that there were benefits in the Proposed Modification, as the costs of implementing system changes to better facilitate the settlement of microgeneration would need to be made at some point, and that it may be most efficient to do this now.

The Panel agreed that the Proposed Modification would have a neutral impact on Applicable BSC Objectives (a), (b) and (c).

#### b) Alternative Modification

The unanimous provisional view of the Panel was that the Alternative Modification would not better facilitate the achievement of Applicable BSC Objective (c) when compared to the Proposed Modification, for the following reasons:

- Whilst the Panel felt that the single process may be more efficient, all Panel members felt, (to differing extents) that removing the ability for NHH microgeneration customers to have a different Supplier for Import and Export, would reduce competition.

The Panel agreed that the Alternative Modification would have a neutral impact on Applicable BSC Objectives (a), (b) and (d).

#### c) Provisional recommendation to the Authority

The Panel therefore agreed a majority provisional recommendation to the Authority that:

- The Proposed Modification should not be made; and that
- The Alternative Modification should not be made.

### 5.1.3 Implementation Date (Proposed and Alternative)

The Panel disagreed with the P213 Group's proposed Implementation Date (05 November 2009, provided that an Authority decision is received by 05 May 2008). The Panel felt that this timescale was too generous, and that a shorter timescale could be justified.

The Panel noted that Central Systems changes would take 32 weeks to implement and that participants had requested between 12 and 24 months to implement the proposed changes.

The Panel noted that, for the Proposed Modification, the existing arrangements would remain in place and could be utilised by participants following the implementation date; however, for the Alternative, all existing microgeneration Suppliers would have to transfer their NHH Export MPANs to Import/Export MPANs. In doing so, these Suppliers would have to use the new arrangements as soon as they are implemented.

The Panel's initial view was that the **November 2008** release would be a more appropriate date which could deliver the solution earlier but allow twelve months for Central System and Party changes. It was noted that CSD changes would be delivered six months before implementation. The Panel noted that they would consider the implementation dates again in light of the report phase consultation responses received. Given the Central Systems timescales noted above, and the time required by participants, this would mean that an Authority decision would be needed on or before 08 November 2007.

The Panel asked ELEXON to consider an appropriate fall back date for P213 Proposed and Alternative, should a decision not be received by the first cut off date. To retain an implementation within a scheduled release that is twelve months after approval ELEXON has proposed the implementation date of 8 November 2009.

### 5.1.4 Legal Text

The Panel reviewed the draft text for P213 Proposed and Alternative, and agreed that both address the defect identified by the Modification Proposal.

## 5.2 Results of Report Phase Consultation

This section will be completed following the Report Phase consultation.

## 5.3 Panel's Consideration of Draft Modification Report

This section will be completed following the Panel meeting at which the draft Modification Report and Report Phase consultation responses are considered.

## 5.4 Panel's Final Recommendation to the Authority

This section will be completed following the Panel meeting at which the draft Modification Report and Report Phase consultation responses are considered.

# 6 TERMS USED IN THIS DOCUMENT

Other acronyms and defined terms take the meanings defined in Section X of the Code.

| Acronym/Term | Definition |
|---|---|
| CoS | Change of Supplier |
| CSD | Code Subsidiary Documents |
| HH | Half Hourly |
| LLFC | Line Loss Factor Class |

| | |
|---|---|
| MDD | Market Domain Data |
| MDDM | Market Domain Data Management |
| MTD | Meter Technical Details |
| NHH | Non Half Hourly |
| MPAN | Meter Point Administration Number |
| NHHDA | Non Half Hourly Data Aggregator |
| NHHDC | Non Half Hourly Data Collector |
| NHHMOA | Non Half Hourly Meter Operator Agent |
| SVAA | Supplier Volume Allocation Agent |

# 7 DOCUMENT CONTROL

## 7.1 Authorities

| Version | Date | Author | Reviewer | Reason for Review |
|---|---|---|---|---|
| 0.3 | 09/08/07 | Ysanne Hills | David Jones | For technical review |
| 0.4 | 15/08/07 | Ysanne Hills | BSC Parties and other interested parties | For consultation |
| 0.5 | 31/08/07 | Ysanne Hills | | For technical review |
| 0.5 | 31/08/07 | Ysanne Hills | | For quality review |
| 0.6 | 07/09/07 | Change Delivery | BSC Panel | For Panel decision |
| 1.0 | 13/09/07 | BSC Panel | | For Authority decision |

## 7.2 References

| Ref. | Document Title | Owner | Issue Date | Version |
|---|---|---|---|---|
| 1 | Panel Paper 121/08 | ELEXON | 14/12/06 | N/A |
| 2 | ENSG Report | DTI | 2007 | N/A |
| 3 | Ilex Report | DTI | 12/2004 | N/A |

## APPENDIX 1: LEGAL TEXT

Draft legal text for the P213 Proposed and Alternative Modifications is attached as a separate document, Attachment 1.

## APPENDIX 2: PROCESS FOLLOWED

Copies of all documents referred to in the table below can be found on the P213 page of the ELEXON Website.

| Date | Event |
|---|---|
| 27/04/07 | Modification Proposal raised by E.ON UK |
| 10/05/07 | IWA presented to the Panel |
| 21/05/07 | First Assessment Procedure Modification Group meeting held |
| 01/06/07 | Requirements Specification issued for BSC Agent impact assessment |
| 01/06/07 | Request for Party/Party Agent impact assessments request issued |
| 01/06/07 | Request for Transmission Company analysis issued |
| 01/06/07 | Request for BSCCo impact assessment issued |
| 01/06/07 | Initial Assessment Procedure Consultation issued |
| 15/06/07 | BSC Agent impact assessment response returned |
| 15/06/07 | Party/Party Agent impact assessment responses returned |
| 15/06/07 | Transmission Company analysis returned |
| 15/06/07 | BSCCo impact assessment returned |
| 15/06/07 | Initial Assessment Procedure Consultation returned |
| 19/06/07 | Second Assessment Procedure Modification Group meeting held |
| 28/06/07 | Third Assessment Procedure Modification Group meeting held |
| 04/07/07 | Second Assessment Procedure Consultation issued |
| 05/07/07 | Second (Central Systems only) Impact Assessment issued |
| 18/07/07 | Second Assessment Procedure Consultation returned |
| 19/07/07 | Second (Central Systems only) Impact Assessment returned |
| 20/07/07 | Fourth Assessment Procedure Modification Group meeting held |
| 09/08/07 | Assessment Report presented to the Panel |

## ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL[7]

[7] Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link: http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

| | |
|---|---|
| **Meeting Cost** | £ 2,000 |
| **Legal/Expert Cost** | £ 0 |
| **Impact Assessment Cost** | £ 12,000 |
| **ELEXON Resource** | 60 man days<br><br>£16,260 |

**Impact Assessment**

The Impact Assessment costs have increased from those stated in the IWA. A second Impact Assessment was undertaken for both Cap Gemini and Logica, due to an additional system change being noted following the first Impact Assessment.

## APPENDIX 3: ASSESSMENT REPORT

The P213 Assessment Report is attached as a separate document, Attachment 2.

For the purposes of the Report Phase consultation and the Panel's consideration of the draft Modification Report, the P213 Assessment Report can be found on the P213 page of the BSC website.

The Assessment Report includes:

- The conclusions of the Modification Group regarding the areas set out in the P213 Terms of Reference;
- Details of the Group's membership;
- The full results of the Assessment Procedure impact assessment; and
- Full copies of all responses to the Assessment Procedure consultation.

## APPENDIX 4: RESULTS OF IMPACT ASSESSMENT

The full Impact Assessment Results are included in Appendix 5 of the P213 Assessment Report.

## APPENDIX 5: REPORT PHASE CONSULTATION RESPONSES

To be attached following the Report Phase consultation.