

Change Proposal – BSCP40/02	CP No: 1378 Version No: v2.0
Title Facilitating appointment of Multiple HHMOAs for Third Party Access on Licence Exempt Distribution Network	
Description of Problem/Issue <i>(mandatory by originator)</i> The Electricity and Gas (Internal Market) Regulations 2011 came into force in November 2011, and implements in UK law the EU requirement for customers on private (i.e. licence exempt) networks to be able to purchase electricity from a third party Supplier. One of the metering arrangements that can support this (as described in section 4.9.3 of BSCP502 and section 8.4.3 of BSCP514) is to treat the private network as a Complex Site.¹ Where this occurs, the consumption of the private network supply is determined by netting the Meter at the point of private network connection to the Distribution System (Boundary Point Meter) and the Meter of the individual embedded customer (Third Party Meter). This is known as “Difference Metering”. To help with consistency, and to ensure that the HHDC correctly determines the consumption difference between Boundary Point Meters and Third Party Meters, BSCP502 and BSCP514 currently require that both the private network Supplier and the customer Supplier use the same HHMOA and HHDC for Difference Metering. This CP contends that the current arrangements obligating the use of a common HHMOA restrict competition by removing the free choice of HHMOAs for Third Party Suppliers and their customers.	
Proposed Solution CP1378 v2.0 seeks to allow Third Party Suppliers and customers on private networks the option to choose their HHMOAs for Difference Metering. The obligation to use a common HHDC will still apply. The following new requirements will be introduced: • The HHMOA appointed to the Boundary Point Metering System will be obligated to indicate on the “complex site supplementary information form” where Difference Metering is in place. This will highlight to the common HHDC that it is required to subtract the Metered Volumes for Third Party Metering Systems. However, it will not contain the details of those Meters (as these are not available to the Boundary Point MOA). The “complex site supplementary information form” will be updated to include a tick box for	

¹ A Complex Site is any site that requires the Half Hourly Meter Operator Agent to send a ‘Complex Site Supplementary Information Form’ to Half Hourly Data Collectors (HHDCs) in addition to the D0268 Half Hourly Meter Technical Details, to enable the HHDC to correctly interpret the Metered Data from the site.

this purpose.

- Each HHMOA appointed to the Third Party Metering Systems will provide the D0268 to the common HHDC.
- The common HHDC for the private network will combine the D0268s provided by the relevant HHMOAs to ensure that the correct Metered Volumes of energy enter Settlement. The common HHDC will determine:
 - The Metered Volumes for each Third Party Metering System in accordance with the D0268s provided by the HHMOAs appointed to those Metering Systems;
 - Metered Volumes for the Boundary Point Metering by subtracting the quantities of Active Energy for each Third Party Metering System on the network.
- And, in order to allow the HHDC to perform this process correctly, Third Party Suppliers through their HHMOA will need to notify the appointed HHDC that the Metering System is subject to a difference metering arrangement. The information must include the MSID of the relevant Boundary Point Metering System.

Justification for Change

The current arrangements restrict competition by removing the free choice of HHMOA for Third Party Suppliers and their customers. Industrial and Commercial (I&C) Customers are accustomed to signing portfolio wide Meter Operator agreements in order to obtain competitive pricing and may not get the best value for money if they were forced to sign one-off MOA agreement for specific sites with Meter Operators with whom they do not have other agreements. Such choice is therefore in the interests of competition.

To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code?

This CP relates to (and is consistent with) Sections J and L of the BSC.

Estimated Implementation Costs *(mandatory by BSCCo)*

One ELEXON man day of effort to implement the redlined changes. One ELEXON man day equates to £240.

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

BSCP514 – section 8.4.3
BSCP502 – section 4.9.3

Impact on Core Industry Documents or System Operator-Transmission Owner Code <i>(mandatory by originator)</i> No impact identified.
Related Changes and/or Projects <i>(mandatory by BSCCo)</i> N/A
Requested Implementation Date <i>(mandatory by originator)</i> Requested Implementation for June 2013 Release. Reason: Next available release date.
Version History <i>(mandatory by BSCCo)</i> CP1378 v1.0 was raised on 23 July 2012 and issued for consultation via CPC716. The SVG discussed CP1378 at their meeting in October 2012. The SVG believed there was merit in the solution, but that further amendments to the solution would be required before it could be approved. The Proposer of CP1378 has taken on board the comments and decided to raise v2.0. The main difference between v1.0 and v2.0 is that whilst v1.0 placed the requirement for the Boundary Point HHMOAs to maintain the complex site information, v2.0 requires the HHDC to maintain the complex site information. V2.0 of CP1378 was issued on 30 November 2012
Originator's Details: BCA Name.....<i>Colin Prestwich</i> Organisation.....<i>Smartest Energy</i> Email Address..... <i>Colin-Prestwich@smartestenergy.com</i> Date.....<i>30 November 2012</i>
Attachments: Y/N CP1378_v2_BSCP514_redlined_v0.1 (6 pages) CP1378_v2_BSCP502_redlined_v0.1 (6 pages)