



CP Report – CP1396

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| Meeting Name | Supplier Volume Allocation Group |
| Meeting Date | 5 November 2013 |
| Purpose of paper | For Decision |
| Summary | This report provides details of the background, solution, impacts and industry views for CP1396 'Clarifications and formalising scenarios for the BSCP509 Market Domain Data Change Request process'. We invite the SVG to consider the report and to approve CP1396 for implementation in the February 2014 Release. |

1. Why change?

Background

BSC Procedure (BSCP) [509](#) 'Changes to Market Domain Data' sets out the process steps and timescales for submitting, progressing and obtaining the approval of changes to Market Domain Data (MDD).

The [MDD Handbook](#) is a guidance document that provides:

- An overview of the role of MDD in the electricity market;
- Guidance on how to prepare and submit changes to MDD;
- Descriptions of the different MDD entities, the constraints on data input into MDD and the validation rules that apply to MDD changes; and
- Explanations of the Impact Assessment and publication processes associated with MDD.

What is the issue?

Smartest Energy submitted CP1396 as it had encountered issues where a Distributor submits an MDD Change Request (CR) to create new Line Loss Factor Classes (LLFCs), but does not provide details of the associated Meter Timeswitch Class (MTC). An invalid, or a lacking, MTC/LLFC combination causes problems for Suppliers when billing customers as they cannot validate against MDD.

The Proposer had considered a solution which would amend BSCP509 to capture the need for LLFC MDD CRs to have a corresponding MTC combination for the Half Hourly (HH) market. However, such a change would need to be very specific and would be out of place within BSCP509, which focuses on the MDD CR processes and associated timescales (rather than the technical content of MDD changes).



2. Solution

CP1396 proposes to clarify the requirements of all parties involved in changing MDD (including ELEXON as the BSCCo) when completing and submitting MDD CRs.

Rather than amend BSCP509 to capture a single specific scenario, the CP intends to update and convert the MDD Handbook¹ ('handbook') into a new BSCP509 Appendix 2. BSCP509 will then be amended to provide cross-references to the information in the new Appendix to ensure that participants provide all the necessary information when raising a MDD CR.

ELEXON has reviewed the handbook to make sure the information about completing MDD CR forms is clear and up-to-date.

The CP also proposes to:

- Remove any guidance contained in the handbook that duplicates information already in the main BSCP509 document, such as guidance on the MDD CR process; and
- Amend BSCP509 to capture and formalise the initial validation and feedback process carried out by BSCCo on receipt of a new MDD CR or housekeeping MDD CR.

3. Impacts and costs

Central impacts and costs

The impacted documents and systems are set out below:

| Potential impacts | |
|---|----------------|
| Document impacts | System impacts |
| BSCP509 | None |
| BSCP509 Appendix 'MDD Entity Change Request Forms' | |
| MDD Handbook – conversion into new BSCP509 Appendix | |

The CP will amend BSCP509 to capture the initial check carried out by BSCCo when a new MDD CR or housekeeping MDD CR is submitted and to include cross-references to the new BSCP509 Appendix 2. The proposed redlined changes to BSCP509 are provided in Attachment A.

BSCP509 Appendix 'MDD Entity Change Request Forms' will be renamed Appendix 1. Attachment B contains the proposed revisions to the BSCP509 Appendix.

¹ The existing MDD handbook is a guidance document and therefore does not enforce any requirements on Parties.



A new BSCP509 Appendix 2 will be created and added to the BSC Baseline Statement containing the examples covered by the current handbook. The proposed new Appendix 2 (provided as Attachment C in a 'clean' format) has not been converted into full BSCP format at this stage, however it does contain all the content and sections that will go into the new Appendix from the MDD handbook.

The estimated ELEXON effort to implement CP1396 is set out in the table below:

| ELEXON costs | | |
|---|---------------------------|-------|
| ELEXON effort | Demand-led system changes | Total |
| 3 man days' effort, which equates to £720 | None | £720 |

Party impacts and costs

The changes to BSCP509 will clarify:

- The initial checks that BSCCo undertakes; and
- The initial feedback loop that may be required when a MDD CR is initially received.

The changes will also formalise what information should be provided with a MDD CR, which is currently only guidance in the handbook. This will:

- Reduce the situations where a participant raising the MDD CR does not provide the necessary information to enable the efficient progression of the MDD CR; and
- Help affected parties to do any necessary checks, such as on MTC/LLFC combinations.

CP process required to amend the proposed new BSCP509 Appendix 2

As the current handbook is only a guidance document, amendments to it do not have to go through the rigour of the CP process. By converting the handbook into a new BSCP509 Appendix, future changes to the information contained in the proposed new Appendix will need to be progressed through a CP.

4. Implementation approach

We recommend that CP1396 is implemented on 27 February 2014 as part of the February 2014 BSC Release. This is the next available release.

All respondents to the CP1396 Impact Assessment support the proposed implementation approach.



5. Industry views

We issued CP1396 for Participant Impact Assessment via CPC00731. We received eight responses of which seven agreed with the CP and one was neutral.

The following table shows the breakdown of the responses. You can find the full collated participant responses to CP1396 in Attachment D and on the [CP1396](#) page of the BSC Website.

| Summary of responses for CP1396 | | | |
|---------------------------------|---|---------|-----------|
| Organisation | Capacity in which organisation operates (Supplier, Licensed Distribution System Operator (LDSO), etc.) | Agree? | Impacted? |
| British Gas | Supplier | Yes | Yes |
| EDF Energy | Supplier | Yes | No |
| Electricity North West Limited | LDSO | Yes | Yes |
| Northern Powergrid | LDSO | Yes | Yes |
| npower | Supplier and Supplier Agents (HH and Non Half Hourly (NHH)) | Yes | No |
| ScottishPower | Generator, Supplier, LDSO, Supplier Agents | Yes | No |
| TMA Data Management Ltd | NHH Data Collector (DC), NHH Data Aggregator (DA), HHDC and HHDA | Yes | No |
| Western Power Distribution | LDSO | Neutral | Yes |

All respondents support the change or are neutral. Respondents in support of the CP agree that the proposed revisions to BSCP509 and the creation of the new BSCP509 Appendix 2 will clarify the MDD CR process.

The neutral respondent believes that the CP does not address fully the original problem of Distributors providing incomplete information for valid MTC/LLFC combinations. They believe that something more specific, covering what entity forms are needed in all possible scenarios, would be beneficial to ensure that all the correct information is provided by Distributors. As noted in Section 1, the Proposer did consider and discount a more specific approach. We suggest that the CP1396 solution has wider benefits since the content of the new BSCP509 Appendix 2 covers all types of MDD changes, including those involving Distributors. Requiring parties to refer to the new BSCP509 Appendix 2 will ensure that all the correct information is provided when raising MDD CRs. Formalising the initial feedback loop will ensure that parties are contacted by BSCCo if there is concern over incomplete information.

Four respondents have indicated an impact on their organisation, which in all cases involve minor updates to internal process documentation.



Comments on the proposed redlining

We received a few comments from one respondent on the proposed new BSCP509 Appendix 2. The following table shows these along with any recommended revisions. The recommended revisions can also be seen as redlining in the proposed new BSCP509 Appendix 2 (Attachment C).

Where we recommend a revision to the proposed new BSCP509 Appendix 2, it will either correct an error or provide extra clarity.

| Redline comments | | | |
|------------------|---|--|--|
| Organisation | Document name/ location | Comment | ELEXON's recommendation |
| ScottishPower | BSCP509 Appendix 2 - Section 1.3 last line | Reference is made to BSC website – access to data is via www.elexon.co.uk , in addition at present known MDD information can be viewed either on ELEXON website or on the ELEXON Portal, so reference to BSC website doesn't make sense, especially if you are a new market entrant. E.g. MDD Circulars are on ELEXON website, MDD data is on Portal, you may wish to consider some form of alignment. | <u>No change recommended:</u> We agree and recognise that MDD is accessible via the ELEXON Portal, with the ELEXON website containing information on the MDD processes. However 'BSC Website' is the Code defined term for the purposes of such websites and referencing in this way is consistent with other existing BSCPs. Referring to the BSC Website also future proofs the Appendix, by minimising the need for housekeeping type changes if the ELEXON Portal and/or ELEXON website were to change name. The MDD page of the ELEXON website includes a link to the MDD area of the ELEXON Portal. Participants who are new to MDD and the MDD Change process are given support by ELEXON on where to access MDD information. |
| | BSCP509 Appendix 2 - Sections 3.1/3.2/3.4/ 3.22 Guidance on Change Process | Reference is made to criteria detailed in BSCP 509 section 4.2 – current section in BSCP 509 is only MDD Change Request Form F509/01 – Registration Criteria is currently defined in section 4.3. | <u>Change recommended:</u> Cross-referencing error. Each instance identified (in 3.1, 3.2, 3.4 and 3.22) should be amended to refer to BSCP509 Section 4.3. |



| Redline comments | | | |
|------------------|--|--|--|
| Organisation | Document name/ location | Comment | ELEXON's recommendation |
| | BSCP509 Appendix 2 - Section 3.8 'Entity 17 - LLFCs' - Guidance on Change Process | <p>Additional validation – LLFC discontinued, advice is given to end date child combinations, however it may be helpful to add that it may be prudent at this stage to check to see if MTC/SSC combination can be end dated (Entity 54) and if so they may wish to consider the individual MTC (Entity 53) and SSC (Entity 32) to see if they can be end dated as well. This area has been covered under each of the relevant data items, but may help if repeated with regard to LLFC overall process.</p> <p>In addition it should be made clear that new LLFC can only be added to MDD with Distributor permission, furthermore any valid combinations (Entity 55, 56 and 63) that include the LLFC can only be submitted by a Distributor or with the relevant Distributor's agreement. BSCP128 may cover this area but it is worth repeating with regard to LLFC.</p> | <p><u>Change recommended:</u></p> <p>Section 3.8 'Additional Validation' box, should have the following sentence added at the end of the second paragraph for clarity:</p> <p><u>When discontinuing a Line Loss Factor Class and associated child combinations, the originator should check if any Valid MTC SSC Combinations (Entity 54) are now redundant, and can also be end dated. If so, there may also be MTCs (Entity 53) and SSCs (Entity 32) that can be end dated.</u></p> <p><u>Change recommended:</u></p> <p>Section 3.8 'Guidance on Change Process' box should be updated to include an additional fourth paragraph for clarity:</p> <p><u>If it is not the Distributor creating an LLFC, the appropriate authorisation must be gained from the relevant LDSO. This authorisation must also be gained if an LLFC is to be linked to any valid combinations (Entity 55, Entity 56 and Entity 63).</u></p> |
| | BSCP509 Appendix 2 - Section 3.9 – Field Details, sub section Region ID | Field Details, sub section Region Id - State it should be 2 characters, however in Description/Comments field it is 'either EW for England & Wales or 'S' for ____ , presume you mean Scotland there, however if the Region ID is a mandatory 2 characters then 'S' will be invalid. | <p><u>Change recommended:</u></p> <p>As noted <u>Scotland</u> is missing from Section 3.9 in the 'Field Details' table and should be added.</p> <p>In addition 'No of Chars' column should be updated to clarify that the number of characters to be provided is:</p> <p><u>2 Max. (including spaces)</u></p> |



| Redline comments | | | |
|------------------|---|--|---|
| Organisation | Document name/ location | Comment | ELEXON's recommendation |
| | BSCP509 Appendix 2 - Section 3.10 – Brief Description | Last sentence – 'This data is manually distributed to Market Participants, in word format, on a <i>monthly basis</i> by e-mail'. This should be ' <i>on an annual basis</i> '. | <p><u>Change recommended:</u></p> <p>While the data is updated on an annual basis, it is then distributed on a monthly basis. Therefore the last sentence in the 'Brief Description' box should be updated to clarify when the data is updated and how often it is distributed:</p> <p>This data is <u>updated on an annual basis, and is</u> manually distributed to Market Participants, in word format, on a monthly basis by email.</p> |
| | BSCP509 Appendix 2 - Section 3.11 | The Clock Interval start time is given in the format hhmmss, why do we need ss, given that the clock interval data table in MDD is published in HHMM. | <p><u>Change recommended:</u></p> <p>The MDD management tool requires 6 characters. Currently, when a 4 digit (hhmm) Start or End Time is submitted, the 5th and 6th digits (the seconds 'ss') are defaulted to 00.</p> <p>Update the 'No of Chars' column for 'Start Time' and 'End Time' to clarify the above by adding the following:</p> <p><u>4 – 6</u></p> <p>Update the 'Description/Comments' column for 'Start Time' and 'End Time' to clarify the above:</p> <p>The Clock Interval start time in the format <u>hhmm or</u> hhmmss (e.g. <u>0730 or</u> 073000).</p> <p>Update the 'Additional Validation' to include a second sentence to clarify the above:</p> <p><u>If a 4 digit Start Time or End Time is submitted, the MDD system will default the 5th and 6th digit to 00.</u></p> |



| Redline comments | | | |
|------------------|--|--|---|
| Organisation | Document name/ location | Comment | ELEXON's recommendation |
| | BSCP509 Appendix 2 - Section 3.25 Guidance on Change Process | First line reads 'See the Entity Diagram for valid combinations in Section 4.2' however throughout the Handbook other sections state 'see the Entity Diagram in Section 4.2' – Handbook should be consistent throughout. | <u>Change recommended:</u> Sentence should be amended to be consistent with the rest of document to: See the Entity Diagram in Section 4.2 for valid combinations in section 4.2 . |
| | BSCP509 Appendix 2 - Glossary | Metering System was capitalised in section 1.1, therefore a brief description should be included in the Glossary, in addition it may be helpful to include a brief description of AA and EAC in the Glossary. | <u>Change recommended:</u> As per the suggestion we recommend that the three terms (Metering System, Estimated Annual Consumption (EAC) and Annualised Advance (AA)) are defined in the glossary. |

6. Recommendations

Assessment review

CP1396 will help to ensure that when a Participant submits an MDD CR, the necessary information is provided to progress efficiently through the MDD CR process. Formalising the initial 'feedback' loop through the revisions to BSCP509 will also ensure that if any information is incomplete then ELEXON will advise the Participant raising the MDD CR in a timely way, so the necessary information can be obtained and the MDD CR resubmitted.

All respondents support the change or are neutral. We recommend that the SVG approves the CP.

If the SVG approves CP1396, including the creation of the new BSCP509 Appendix 2, then it will need to make a recommendation to the BSC Panel that the new BSCP509 Appendix 2 becomes a new Code Subsidiary Document and is added to the BSC Baseline Statement. This is because the SVG's Terms of Reference only permit it to amend items on the BSC Baseline Statement that are already defined as being the Committee's responsibility (i.e. existing Code Subsidiary Documents and appendices).



Recommendations

ELEXON invites the SVG to:

- a) **APPROVE** CP1396 for implementation on 27 February 2014 as part of the February 2014 Release;
- b) **AGREE** the proposed amendments to BSCP509 and BSCP509 Appendix; and
- c) **RECOMMEND** to the Panel that the proposed new BSCP509 Appendix 2 'MDD Change Request Entity Validation' in Attachment C (including the minor revisions suggested by a respondent) is adopted as a formal Code Subsidiary Document and is added to the BSC Baseline Statement.

Appendices:

None

Attachments:

Attachment A – BSCP509 redlining v0.3

Attachment B – BSCP509 Appendix redlining v0.2

Attachment C – Proposed new BSCP509 Appendix 2 v0.3

Attachment D – CP1396 Impact Assessment responses

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