

## CP1430 'Clarification to the ECVN/MVRN processes'



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### About This Document

This document is the Final Change Proposal (CP) Report for CP1430, which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG) to approve CP1430.

There are five parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the ISG's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision to approve this change.
- Attachments A-C contain the approved redlined changes to deliver the CP1430 solution.
- Attachment D contains the full responses received to the CP Consultation.

## About Volume Reallocation Terminations

[Trading Dispute DA618](#) was raised following a Party's unsuccessful attempt to stop a Metered Volume Reallocation Notification (MVRN) reallocating volumes to the Subsidiary Party. The Lead Party submitted a Metered Volume Reallocation Notification Agent (MVRNA) Authorisation Termination Request. They believed this would stop the reallocation, but it only terminated the MVRNA Authorisation between the Lead and Subsidiary Parties, leaving the existing MVRNs in place. The Lead Party subsequently submitted a Volume Notification Nullification Request (VNNR), which terminated the reallocation as originally intended.

There are currently two ways a Party can stop a reallocation. These are to overwrite the MVRN or to submit a VNNR.

An MVRN can be overwritten to cease reallocations in two ways: giving it an end date, or setting the reallocation amount to zero. Amending the MVRN is the responsibility of the MVRNA. The VNNR terminates all MVRNs and Energy Contract Volume Notifications (ECVNs) between the two stated energy accounts. To successfully submit a VNNR, Parties must have already terminated all MVRNA and Energy Contract Volume Notification Agent (ECVNA) Authorisations.

The two methods are required as MVRN amendments can only be made by the MVRNA (who could be either the lead or subsidiary Party), whereas the MVRNA Authorisation Termination and VNNR can be done by either Party. This eliminates the possibility of a Party acting as MVRNA refusing to amend the MVRN.

## What is the issue?

A 'Lessons Learned' exercise was conducted following Trading Dispute DA618. This took account of the views of both BSC Panel Members and Trading Disputes Committee (TDC) Members, and identified numerous instances of unclear advice regarding the termination process within the Code Subsidiary Documents (CSDs). It recommended several changes to clarify the ECVN and MVRN processes set out in [Balancing and Settlement Code Procedure \(BSCP\) 71 'Submission of ECVNs and MVRNs'](#), and to align them better with the Energy Contract Volume Allocation Agent (ECVAA) [Service Description](#) and [User Requirements Specification \(URS\)](#). The BSC Panel endorsed the findings of this 'Work Stream 1' in 2014 ([Panel 228/17](#)).

### Approved solution

CP1430 '[Clarification to the ECVN/MVRN processes](#)' was raised by ELEXON. It will implement the findings of the 'Lessons Learned' exercise by making the following changes:

- Amend BSCP71 to:
  - make it clear that form BSCP71/04 does not terminate existing MVRNs and ask the submitter to acknowledge that they are aware of this;
  - redesign form BSCP71/04 to enhance clarity;
  - document the process to amend a VNNR; and
  - remove the requirement to state the number of Authorisation Termination requests on form BSCP71/04.
- Amend the EVCAA Service Description and URS to:
  - clarify that the ECVAAs only nullifies MVRNs after receiving a valid VNNR, and that the Subsidiary Party can terminate an MVRNA Authorisation; and
  - add a requirement in the URS for the ECVAAs to ensure that the Party has indicated whether there is a VNNR.

### Proposer's rationale

ELEXON believes that aligning the stated documents and clarifying the procedures for terminating MVRNs will avoid confusion for Parties wishing to perform this action. As a result, Parties' original intentions will be executed without the need for subsequent requests. This will reduce the possibility of a resulting Trading Dispute.

### Approved redlining

The ISG recommended that an additional tick box be added to the VNNR form in BSCP71/10, to ensure a participant confirms they have read the relevant paragraph and ensured all relevant authorisations have already been terminated (see Section 7). The approved changes (including this addition) to BSCP71, the ECVAAs Service Description and the ECVAAs URS to deliver the CP1430 solution can be found in Attachments A, B, and C respectively.

### 3 Impacts and Costs

#### Central impacts and costs

##### Central impacts

CP1430 will require updates to BSCP71, the ECVAAs Service Description and the ECVAAs URS. No system changes will be required.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>• BSCP71</li><li>• ECVAAs Service Description</li><li>• ECVAAs URS</li></ul>	<ul style="list-style-type: none"><li>• <i>None</i></li></ul>

##### Central costs

The central implementation costs for CP1430 will be approximately £240 (one ELEXON man day) to implement the necessary document changes.

#### BSC Party & Party Agent impacts and costs

There are no BSC Party and Party Agent impacts or costs anticipated. Consultation respondents confirmed that they will not be impacted.

## 4 Implementation Approach

### Approved Implementation Date

The approved Implementation Date for CP1430 is **5 November 2015** as part of the November 2015 BSC Release, as this is the next available Release that this change can be included in. All CP Consultation respondents agreed with this date.

## 5 Initial Committee Views

### ISG's initial views

ELEXON presented CP1430 to the ISG at its meeting on 24 February 2015 ([ISG166/08](#)).

One ISG Member asked whether there were any discussions around changing the processes following the 'Lessons Learned' exercise. ELEXON advised that the changes that the 'Lessons Learned' exercise recommended are the clarification changes proposed by CP1430, and that no process changes were recommended. The ISG had no other comments.

## 6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment D.

Summary of CP1430 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1430 proposed solution?	5	0	0	0
Do you agree that the draft redlining delivers the intent of CP1430?	5	0	0	0
Will CP1430 impact your organisation?	0	5	0	0
Will your organisation incur any costs in implementing CP1430?	0	5	0	0
Do you agree with the proposed implementation approach for CP1430?	5	0	0	0
Do you have any further comments on CP1430?	0	5	0	0

### Comments on CP1430

We received five responses to the industry consultation for CP1430. All respondents agreed with the CP1430 solution, with one respondent commenting that the proposed changes would help to clarify the process.

### Comments on the proposed redlining

All respondents agreed the proposed redlining, and no respondents provided any specific comments.

### ISG's final views

ELEXON presented the CP1430 Assessment Report to the ISG at its meeting on 21 April 2015. ([ISG168/01](#)).

One Member noted that BSCP71 paragraph 3.11.1 states that the related action can occur 'At any time; or after step 3.11.5 for a previous failed request; or prior to 3.11.4 for a previous request in process'. The Member questioned this wording and commented that 'at any time' would cover the following references. They understand that the intention is to highlight particular points, but believed 'At any time; including...' would have been a better choice of words. They noted however, that this is stylistic and will not alter the intentions of the CP, and so this change was not made.

A Member noted that the CP added a tick box to the BSCP71/04 form, but removed a similar box from the BSCP71/10 form. The Member noted that since these forms are reliant on each other, having a tick box in one, but not the other could lead to ambiguity. ELEXON responded that the box in form BSCP71/10 was not a tick box but was to indicate the number of associated Authorisation termination requests. This was for use as a guide, and would not lead to the request being rejected if it was incorrectly filled in. Because of this, the findings of Workstream 1 had recommended that it should be removed as it served no purpose.

ELEXON clarified that it is within the ISG's remit to request non-material changes to the redlining and that, in this instance, changes to address these concerns would indeed be non-material. An ISG Member responded that including a tick box in both forms would emphasise that both actions need to happen, and that it would require the participant had read the relevant paragraphs in the form. The other ISG Members agreed with this change.

An ISG Member questioned whether there could be more than one Authorisation between two particular Energy Accounts. They believed the redlining assumes that there will only ever be one. The ISG asked whether the VNNR would terminate all notifications between two associated accounts, and if not, what would happen. ELEXON can confirm that there can be multiple Authorisations between a pair of accounts, and that a VNNR will only remove the notifications if all Authorisations between the relevant pair of Energy Accounts have been terminated.

### Final decision

The ISG has:

- **APPROVED** CP1430 for implementation on 5 November 2015 as part of the November 2015 BSC Systems Release.

## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

Glossary of Defined Terms	
Acronym	Definition
BSC	Balancing and Settlement Code ( <i>Industry Code</i> )
BSCP	Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> )
CP	Change Proposal
CSD	Code Subsidiary Document
ECVAA	Energy Contract Volume Allocation Agent
ECVN	Energy Contract Volume Notification
ECVNA	Energy Contract Volume Notification Agent
ISG	Imbalance Settlement Group ( <i>Panel Committee</i> )
MVRN	Metered Volume Reallocation Notification
MVRNA	Metered Volume Reallocation Notification Agent
TDC	Trading Disputes Committee ( <i>Panel Committee</i> )
URS	User Requirements Specification ( <i>Code Subsidiary Document</i> )
VNNR	Volume Notification Nullification Request



## External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	Trading Dispute DA618 Summary document on the BSC Website	<a href="https://www.elexon.co.uk/wp-content/uploads/2012/01/DA618_Non-Confidential_Case_Summary.pdf">https://www.elexon.co.uk/wp-content/uploads/2012/01/DA618_Non-Confidential_Case_Summary.pdf</a>
2	BSCPs page on the BSC Website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a>
2	BSC Panel 228 page on the BSC Website	<a href="https://www.elexon.co.uk/meeting/bsc-panel-228/">https://www.elexon.co.uk/meeting/bsc-panel-228/</a>
2	Service Descriptions on the BSC Website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/service-descriptions/">https://www.elexon.co.uk/bsc-related-documents/related-documents/service-descriptions/</a>
2	User Requirements Specifications on the BSC Website	<a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/user-requirement-specifications/">https://www.elexon.co.uk/bsc-related-documents/related-documents/user-requirement-specifications/</a>
3	CP1430 page on the BSC Website	<a href="https://www.elexon.co.uk/change-proposal/cp1430/">https://www.elexon.co.uk/change-proposal/cp1430/</a>
5	ISG166 page on the BSC Website	<a href="https://www.elexon.co.uk/meeting/isg-166/">https://www.elexon.co.uk/meeting/isg-166/</a>
7	ISG168 page on the ELEXON website	<a href="https://www.elexon.co.uk/meeting/isg-168/">https://www.elexon.co.uk/meeting/isg-168/</a>