

## CP1476 'Facilitation of incremental LLFs'



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### About This Document

This document is the CP1476 Final CP Report which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG) and the Supplier Volume Allocation Group (SVG) to approve CP1476.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and approved implementation approach. It also summarises the ISG's and SVG's views on the approved changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachment A contains the approved redlined changes to deliver the CP1476 solution.
- Attachment B contains the full responses received to the CP Consultation.

# 1 Why Change?

## Current process for Line Loss Factors

[Balancing and Settlement Code Procedure \(BSCP\) 128 'Production, Submission, Audit and Approval of Line Loss Factors'](#) requires all Licensed Distribution System Operators (LDSOs) to submit Line Loss Factor (LLF) data annually through the [D0265 'Line Loss Factor Data File'](#) data flow. This flow is received by Half Hourly Data Aggregators (HHDAs), Suppliers and the Supplier Volume Allocation Agent (SVAA). It contains a value for every Settlement Period for every Settlement Day (17,520 values) per LLF Class (LLFC).

BSCP128 also requires a full data refresh for any other mid-year change to the LLF data. This is known as a mid-year submission. The mid-year submission procedure follows the same rules as the annual submission set out in BSCP128. A mid-year submission may be required for:

- the creation of a new LLF;
- an amendment to an existing LLF; or
- the deletion of an existing LLF.

## What is the issue?

The D0265 flow can hold large volumes of Settlement Period data for potentially thousands of LLFCs, which can equate to millions of rows of information. This means that, if an LDSO requires an additional LLFC, the entire data set must be re-submitted in order for the submission to be compliant with the BSCP. ELEXON must then review and audit the entire mid-year submission data set, including new and existing submissions. This process is in place to ensure data accuracy for new and existing records which can potentially change due to human error. This procedure can be time consuming and inefficient due to the nature of the D0265 flow and the high level of scrutiny involved.

### Approved solution

ELEXON raised [CP1476 'Facilitation of Incremental LLFs'](#) on 27 October 2016. This CP proposes to amend BSCP128 Appendix 7 to allow LDSOs the option to submit incremental changes to their LLF data set. The approved change will allow the LDSOs to submit partial D0265 flows. This partial submission can contain just the LLFCs the LDSOs wants to submit, which could be the creation of a new LLFC, end dating of LLFC or amending an LLF value. This change will mean a D0265 flow could contain far less information than a full submission, which can contain millions of rows of data. LDSOs will still have the option to submit full data sets if they do not have the measures in place to submit incremental files.

### Proposer's rationale

The volume of information contained within a D0265 flow is large and hard to manipulate. ELEXON does not possess the tools to manipulate the millions of rows of data contained within the D0265. If an error occurs, ELEXON relies on the LDSO to make the changes. These can be difficult to complete within the required timescales since these are linked to Market Domain Data (MDD) Releases and SVG meetings. When an LDSO submits a mid-year submission, the entire file is required (as per BSCP128). Compiling and reviewing the submission can be laborious and time consuming due to the sheer quantity of data held within the files. The process involves loading the D0265, which can take from three to five hours, then validating the output against the calculation documents and methodology. In total the process can take up to two Working Days for a full review. ELEXON is required to fully validate and audit each LLF submission, even if the submission only includes a single amendment.

Updating BSCP128 Appendix 7 to include incremental LLFs will drastically reduce the time and effort required to create, load, validate and upload the D0265 file.

### Approved redlining

Attachment A contains the approved changes to BSCP128 Appendix 7 to deliver CP1476.

### 3 Impacts and Costs

#### Central impacts and costs

CP1476 will require changes to BSCP128 Appendix 7. No system changes are required and there will be no impact on BSC Agents.

As BSCP128 Appendix 7 is jointly owned by the ISG and SVG, we are presenting it to both committees for decision.

| Central Impacts  |                |
|--|----------------|
| Document Impacts   | System Impacts |
| <ul style="list-style-type: none"><li>BSCP128 Appendix 7</li></ul> | <i>None</i>    |

#### Central costs

The central implementation costs for CP1476 will be approximately £240 (one ELEXON man day) to implement the relevant document changes<sup>1</sup>.

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

CP1476 is expected to impact LDSOs and ELEXON only. LDSOs will gain the option to submit a partial file for mid-year submission. Seven of the eleven respondents to the Assessment Consultation confirmed that minor process changes will be required to implement the solution. One respondent noted that there will be an internal system impact attached to CP1476. No additional resource from ELEXON will be required.

| BSC Party & Party Agent Impacts |  |
|---------------------------------|--|
| BSC Party/Party Agent           | Impact   |
| Distributors                    | Changes will be required to implement the solution |
| ELEXON                          |  |

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<sup>1</sup> ELEXON already has the ability to process incremental LLFs.

## 4 Implementation Approach

### Approved Implementation Date

CP1476 is approved for implementation on **29 June 2017** as part of the June 2017 BSC Systems Release.

The June 2017 Release is the next available Release that can include this CP.

### ISG's initial views

The ISG considered CP1476 at its meeting on 22 November 2016 ([187/03](#)).

An ISG Member queried how ELEXON will ensure that, following the submission of the incremental LLFs, the previous and enduring data submitted will not be corrupted. ELEXON explained the process for loading the incremental file, which takes the newly proposed revised or amended LLFC/LLFs and appends/removes it to/from the LDSO's already approved D0265. This process reduces the amount of errors which can be associated with larger file loads.

An ISG Member questioned how users other than LDSOs and ELEXON would be affected. This is because the version of the D0265 that is available on the Portal is the SVAA version, but Distributors can send LLFs directly to Suppliers, SVAA and HHDA's over the Data Transfer Network. Another ISG Member responded by saying that the LDSO sends the D0265 flow to ELEXON, which then validates the data flow and publishes it on the ELEXON Portal. Therefore, customers rely only on ELEXON to publish the D0265 for them to collect. ELEXON noted that there should not be any impact on Suppliers because the end result will still be a fully published D0265. Suppliers will be able to download the full data file even after the correction will be made by the incremental LLFs. ELEXON agreed to add a question into the CP Consultation to confirm this.

In light of this process, a Member noted that the Master Registration Agreement (MRA) Data Transfer Catalogue (DTC) CP3497 'Housekeeping amendment to the D0265 Data Flow Notes' is removing the D0265 data flow's 'Notes' which state:

'In England and Wales, this information is not provided direct to participants by Distributors but is published on the BSC Website'.

This note will be removed because it is current operational practice for the ELEXON Portal to publish all the LDSO D0265 data flows for all of Great Britain. DTC CP 3497 will be implemented as part of the [MRA's February 2017 Release](#).

An ISG Member asked how ELEXON notifies parties when a change to the D0265 is made. ELEXON noted that the data is published on the ELEXON Portal and every time that there is a change, BSC Parties are notified ([ELEXON Portal User Guide](#)). In addition to this, ELEXON proposed to send a notification to the Industry through ELEXON's Newscast.

### SVG's initial views

The SVG considered CP1476 at its meeting on 6 December 2016 ([SVG190/03](#)).

SVG Members expressed support for the proposed solution, with one commenting that it would be less effort for Distributors and another that it would be less risky.

An SVG Member queried how Parties will be notified about any incremental changes to the LLF data set. ELEXON replied that Parties are notified every time there is a change on the ELEXON Portal (please see the ELEXON Portal Guide, referred to above). SVG Members noted that, while this notifies Parties of an update it does not highlight what has actually changed. ELEXON added that it was also planning to publish something in Newscast. An SVG Member noted that Parties do not necessarily keep past copies of Newscast. They considered that it would therefore be useful to maintain a version history on the ELEXON Portal explaining what has changed in each incremental version. ELEXON agreed.

## 6 Industry Views

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

| Summary of CP1476 CP Consultation Responses                          |     |    |                           |       |
|--|-----|----|---------------------------|-------|
| Question   | Yes | No | Neutral/<br>No<br>Comment | Other |
| Do you agree with the CP1476 proposed solution?                      | 11  |    |                           |       |
| Do you agree that the draft redlining delivers the intent of CP1476? | 9   | 1  | 1                         |       |
| Will CP1476 impact your organisation?                                | 7   | 4  |                           |       |
| Will your organisation incur any costs in implementing CP1476?       | 2   | 9  |                           |       |
| Do you agree with the proposed implementation approach for CP1476?   | 10  | 1  |                           |       |
| Do you have any further comments on CP1476?                          | 4   | 7  |                           |       |

All eleven respondents agreed with the proposed solution.

One respondent asked for clarity on how ELEXON proposes to add the revisions to LLFs. ELEXON responded that the initial annual submission will be stored within ELEXON's system and once validated will form the basis on which additions, amendments and deletions are made and baselined for future revisions. The submissions are processed by ELEXON's system which automatically loads, validates and produces an output which the LLF team (ELEXON) audit to ensure the data is accurate.

### Comments on the proposed redlining

One respondent queried if the D0265 data flow notes that are currently replicated in BSCP128 Appendix 7 will be removed to align with DTC CP 3497, which will remove the notes from the DTC version of the D0265. ELEXON agreed with the comment and removed the notes from BSCP128 Appendix 7.

One respondent asked if the proposed changes to BSCP128 should refer to amendments to LLFC descriptions and not just the introduction and end-dating of LLFCs. ELEXON replied that the LLF Description is a field in MDD, not the D0265, therefore changes would be made in accordance with the MDDD rules set out in [BSCP509 'Changes to Market Domain Data'](#) and not in accordance with BSCP128 or by using the D0265.

One respondent also noted that it is important that all LLFs within one file should have the same start date. ELEXON replied and stated any revised files will have the same start dates within the file and on the ELEXON Portal.

ELEXON also made some other non-material changes to reflect the Industry's suggestions which are summarised in the table below and have been included in the redlined changes (see Attachment A).

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| Comments on the CP1476 Proposed Redlining |   |                                     |
|---|---|-------------------------------------|
| Document & Location                       | Comment   | ELEXON's Response                   |
| BSCP128<br>Appendix 7<br>1.2              | If "New" and "Revised" are defined terms their definition should be included in the BSC, if not they should not be capitalised. | ELEXON agreed with this suggestion. |
| BSCP128<br>Appendix 7<br>1.2              | First and second paragraphs – replace both occurrences of "end-dated" with "revised".   | ELEXON agreed with this suggestion. |



### ISG's final views

The ISG considered CP1476 at its meeting on 24 January 2017 ([ISG190/02](#)).

An ISG Member asked about the frequency of updates of LLFs within a year. ELEXON responded that annual LLFs begin coming in at the beginning of the audit process in September, with the details published on the ELEXON Portal on the 1st of April the following year. LDSOs can submit mid-year changes with either new or revised LLF values. This can happen at any time but occurs infrequently.

An ISG Member noted that one respondent to the CP Consultation suggested some redlined text changes and asked if these were addressed. ELEXON noted that this was in regards to a new entrant, and this was addressed in section 1.3. An ISG Member noted that this redlining provides clarity in the BSCP that new entrants within a year would have to submit a full D0265 for that particular year.

### SVG's final views

The SVG considered CP1476 at its meeting on 31 January 2017 ([192/03](#)).

An SVG Member queried if ELEXON had addressed a consultation respondent's request for more detail on how it will add the revisions to LLFs. The Chairman highlighted the ELEXON response on page 8 of the CP Assessment Report and the SVG Member confirmed that this answered the question.

### Final decision

The ISG and SVG have:

- **APPROVED** CP1476 for implementation on 29 June 2017 as part of the June 2017 BSC Systems Release.

## Appendix 1: Glossary & References

### Acronyms

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

| Acronyms |   |
|----------|---|
| Acronym  | Definition                              |
| BSCP     | Balancing and Settlement Code Procedure |
| CP       | Change Proposal                         |
| CPC      | Change Proposal Circular                |
| HHDA     | Hourly Data Aggregator                  |
| ISG      | Imbalance Settlement Group              |
| LDSOs    | Licensed Distribution System Operators  |
| LLFC     | LLF Class                               |
| LLFs     | Line Loss Factors                       |
| SVA      | Supplier Volume Allocation              |
| SVAA     | Supplier Volume Allocation Agent        |
| SVG      | Supplier Volume Allocation Group        |

### DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

| DTC Data Flows and Data Items |                            |
|-------------------------------|----------------------------|
| Number                        | Name                       |
| D0265                         | Line Loss Factor Data File |

### 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              | BSCP page on the ELEXON 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              | D0265 page on the MRA website     | <a href="https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0265&amp;FlowVers=1&amp;searchMockFlows=False">https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0265&amp;FlowVers=1&amp;searchMockFlows=False</a> |
| 2              | LLFs page on the ELEXON website   | <a href="https://www.elexon.co.uk/glossary/line-loss-factor/">https://www.elexon.co.uk/glossary/line-loss-factor/</a>   |
| 3              | CP1476 page on the ELEXON website | <a href="https://www.elexon.co.uk/change-proposal/facilitation-incremental-llfs/">https://www.elexon.co.uk/change-proposal/facilitation-incremental-llfs/</a>   |

| External Links |   |   |
|----------------|---|---|
| Page (s)       | Description                                   | URL   |
| 7              | ISG187 page on the ELEXON website             | <a href="https://www.elexon.co.uk/meeting/isg-187/">https://www.elexon.co.uk/meeting/isg-187/</a>   |
| 7              | February 2017 Release page on the MRA website | <a href="https://www.mrasco.com/change-proposals/mra-change-release-information/23rd-february-2017">https://www.mrasco.com/change-proposals/mra-change-release-information/23rd-february-2017</a> |
| 7              | ELEXON Portal on the ELEXON website           | <a href="https://www.elexonportal.co.uk/article/view/170?cachebust=fncl9l5s7m">https://www.elexonportal.co.uk/article/view/170?cachebust=fncl9l5s7m</a>   |
| 10             | ISG190 page on the ELEXON website             | <a href="https://www.elexon.co.uk/meeting/isg-190/">https://www.elexon.co.uk/meeting/isg-190/</a>   |
| 10             | SVG192 page on the ELEXON website             | <a href="https://www.elexon.co.uk/meeting/svg-192/">https://www.elexon.co.uk/meeting/svg-192/</a>   |