

CP1476 'Facilitation of incremental LLFs'



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About This Document

The purpose of this Change Proposal (CP) 1476 CP Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP2476. The Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1476.

There are three 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 and SVG's initial views on the proposed changes.
- Attachment A contains the proposed redlined changes to deliver the CP1476 solution.
- Attachment B contains the specific questions on which we seek your views. Please use this form to provide your response to these questions, and to record any further views or comments you wish to be considered.

Contact

Giulia Barranu

020 7380 4330

giulia.barranu@elexon.co.uk



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.

Proposed 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 proposed change will allow the LDSOs to submit partial D0265 flows. This partial submission can contain just the LLFC 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.

CP Consultation Question

Do you agree with the CP1476 proposed solution?

Please provide your rationale.

We invite you to give your views using the response form in Attachment B

Proposed redlining

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

CP Consultation Question

Do you agree that the draft redlining delivers the CP1476 proposed solution?

If 'No', please provide your rationale.

We invite you to give your views using the response form in Attachment B

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">BSCP128 Appendix 7	<i>None</i>

Central costs

The central implementation costs for CP1476 will be approximately £240 (one ELEXON man day) to implement the relevant document changes¹.

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. We believe that minor process changes will be required to implement the solution. No additional resource from ELEXON will be required.

No other BSC Parties or Party Agents are expected to be impacted but we seek confirmation of this through this CP Consultation.

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

CP Consultation Questions

Will CP1476 impact your organisation?

If 'Yes', please provide a description of the impact(s) on your organisation and any activities which you will need to undertake between the approval of CP1476 and the CP1476 Implementation Date (including any necessary changes to your systems, documents and processes). Where applicable, please state which of the roles that you operate as will be impacted and any differences in the impacts between each role.

Will your organisation incur any costs in implementing CP1476?

If 'Yes', please provide details of these costs, how they arise and whether they are one-off or on-going costs.

We invite you to give your views using the response form in Attachment B

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¹ ELEXON already has the ability to process incremental LLFs.

4 Implementation Approach

Recommended Implementation Date

CP1476 is proposed 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.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1476?

Please provide your rationale.

We invite you to give your views using the response form in Attachment B

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 data submitted will not be corrupted. ELEXON explained the process for loading the incremental file, which takes the newly proposed, end dated or amended LLFC/LLFs and appends/removes it to/from the LDSO's already approved D0265. This process negates the risk which can currently exist with a full file submission which can contain millions of rows of data.

An ISG Member questioned how other users would be affected, as the version of the D0265 that is available on the Portal is the SVAA version, but Distributors can send this directly to Suppliers, SVAA and HHDAs.

Another ISG Member responded that ELEXON provides the D0265 to the recipient. The LDSO sends the data flow to ELEXON, and then ELEXON validates the data flow, which is published on the ELEXON Portal. Therefore, customers rely only on ELEXON to get the D0265. 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 noted that the CP Progression Paper was not clear on how ELEXON will deal with new, removed and changed LLFs. The 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.

Another ISG Member queried if there will be any impact on Suppliers following the implementation of this CP. Suppliers download the full data file and the proposed solution may impact the ability of customers to download the D0265. 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.

SVG's initial views

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

The SVG noted that the proposed solution is aligned with their previous views on the issue.

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. The SVG Member clarified that it will be useful to add a note on the ELEXON Portal with a description of the incremental LLF flow version. ELEXON confirmed that this will be implemented.

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	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	D0265 page on the MRA website	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0265&FlowVers=1&searchMockFlows=False
2	LLFs page on the ELEXON website	https://www.elexon.co.uk/glossary/line-loss-factor/
3	CP1476 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/facilitation-incremental-llfs/

External Links		
Page (s)	Description	URL
7	ISG187 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-187/
7	February 2017 Release page on the MRA website	https://www.mrasco.com/change-proposals/mra-change-release-information/23rd-february-2017
7	ELEXON Portal on the ELEXON website	https://www.elexonportal.co.uk/article/view/170?cachebust=fnc19l5s7m