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CP1500 'Amend the BSCP537 Appendices to add a requirement for Suppliers and MOAs to demonstrate the ability to send and receive Smart Meter Configuration details'

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About This Document

This document is the Change Proposal (CP) 1500 Final CP Report which ELEXON has published following the final decision from the Imbalance Settlement Group (ISG), Supplier Volume Allocation Group (SVG) and Performance Assurance Board (PAB) to approve CP1500.

There are four 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, SVG's and PAB's views on the proposed changes and the views of respondents to the CP Consultation, along with the final decision on whether to approve this change.
- Attachments A -B contain the approved redlined changes to deliver the CP1500 solution.
- Attachment C contains the full responses received to the CP Consultation.

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Final CP Report**

5 April 2018

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1 Why Change?

Background

For a Data Communications Company (DCC) serviced SMETS v2.0 Meter (smart Meter)¹, the process by which Suppliers and Meter Operator Agents (MOAs) interact is changing. In order to achieve [the 2020 installation target](#), the rate of installing smart Meters is expected to increase considerably over the next few years.

Due to the increased functionality of smart Meters, the roll-out is also expected to result in the development of new 'Time of Use' tariffs. The 'Time of Use' tariff, in conjunction with a smart Meter, allows Suppliers to target their costs to particular periods of use. The smart Meter provides a real-time breakdown of costs depending on the time of day and prevailing 'Time of Use' tariff rate. To accommodate the roll-out of smart Meters and the consequent changes in how customers interact with their supply contract and services, many long-standing BSC processes have changed.

Under current Supplier Hub arrangements for non-DCC serviced smart Meters, MOAs:

- configure and reconfigure Meters on behalf of Suppliers; and
- inform Data Collectors (DCs) of the Meter configuration details.

Under the new arrangements for DCC serviced smart Meters (currently only SMETS v2.0), Suppliers are required to:

- configure and reconfigure Meters; and
- pass the configuration details on to the Non Half Hourly (NHH) MOA.

Suppliers send the configuration details using a D0367 'Smart Meter Configuration Details' data flow format. This data flow contains information such as the Meter ID (Serial Number), Time Pattern Regime(s)² and the relevant effective Settlement dates. It can either be sent as a D0367 data flow or by an alternate method, as agreed bilaterally between the Supplier and the NHHMOA³.

Qualification Process

In order to demonstrate that a Party or Party Agent has the necessary systems and processes in place to fulfil its obligations and to mitigate/minimise the risks of failure, they must undergo a Qualification process. [The Balancing and Settlement Code \(BSC\) Procedure \(BSCP\) 537 'Appendix 1 Self Assessment Document \(SAD\)'](#) contains the necessary requirements for both Qualification and re-Qualification. Applicants are required to complete the SAD in accordance with [BSCP537 'Qualification process for SVA Parties, SVA Party Agents and CVA MOAs'](#).

The Qualification process only applies to new Suppliers and Party Agents. The re-Qualification process only applies to Party Agents. For the avoidance of doubt, this CP does not require Qualified Party Agents to re-Qualify, unless they deem they are making a Material Change to their systems as per the process set out in BSCP537.

¹ Smart Metering Equipment Technical Specifications: second version. Describes the minimum physical, functional, interface and Data requirements of an Electricity Smart Metering Equipment that a Supplier is required to install in order to comply with condition 39 of its Licence.

² The unique market-wide reference for a Time Pattern Regime being used to calculate money owed for energy used by each customer. A pattern of switching behaviour through time that one or more Settlement Register uses.

³ For the purpose of this report we will only refer to D0367, but this should be taken to refer equally to any alternative means of communication agreed bilaterally



What is a Data Flow?

A Data Flow is a structured message, containing a specific set of information, sent in the Data Transfer Network (DTN). Each flow is in a set format and contains a list of populated data fields. These Data Flows are used to transfer specific information between industry participants.

The [MRA Data Transfer Catalogue](#) contains a compiled list of all Data Flows and their individual components.

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What is the issue?

The Qualification (and re-Qualification for NHHMOAs) process does not currently require Suppliers or NHHMOAs to demonstrate their ability to send and receive D0367 data flows respectively. The responsibilities on Suppliers and NHHMOAs in respect of the exchange of smart Meter Configuration Details are not currently included in BSCP537 Appendix 1 or BSCP537 Appendix 2.

Suppliers will have to configure and reconfigure smart Meters at a higher frequency than MOAs currently have to configure non-smart Meters. This is a new responsibility for Suppliers and there is no assurance in place to check that Suppliers have the ability to create and send D0367 data flows, or that NHHMOAs are able to receive them as part of their Qualification process. It should be noted that Suppliers' and NHHMOAs' ability to send and receive other data flows that are also required for Settlement purposes are tested as part of the Qualification process, but this has not yet been extended to D0367 data flows because they are not included in BSCP537 or its Appendices.

Due to the more active role that Suppliers will play in configuration and re-configuration (alongside a possible need to develop their technical expertise in order to translate the DCC User Interface Responses⁴ into data flows), there is a risk that D0367 data flows will not contain all of the required information, be materially inaccurate or not be sent to, or received by the correct NHHMOA.

⁴ The means by which DCC users interact with DCC devices as well as some Service Requests that do not communicate with DCC devices.

Proposed solution

Amend BSCP537 Appendices 1 and 2 to include a requirement for new Suppliers to confirm that they are able to collate and send a D0367 data flow, and that new and/or re-Qualifying NHHMOAs are able to receive and process them. BSCP537 Appendices⁵ should include the obligation to demonstrate the ability to send and receive D0367 data flows, which may also be subject to inclusion in the annual BSC Audit.

Proposer's rationale

[BSCP514 'SVA Operations for Metering Systems Registered in SMRS'](#) outlines when a D0367 data flow should be sent. This CP introduces Qualification requirements that provide assurance that Suppliers and NHHMOAs are able to comply with BSCP514 and that correct data is used for Settlement, thus reducing the Settlement Risk.

The SAD requires Suppliers and NHHMOAs to evidence the controls and procedures they have in place for sending, receiving and processing of numerous data flows. BSCP537 Appendix 2 contains the lists of data flows that have to be tested for each role. Introducing the D0367 data flow into the BSCP537 Appendices will bring it into line with other data flows that are checked as part of the Qualification and re-Qualification process.

Issue 69

Issue 69 '[Performance Assurance Framework Review](#)' was raised to review how ELEXON conducts Performance Assurance. The Issue Workgroup is looking at four work streams, one of which is smart Metering. A paper was presented to the PAB – '[Smart Risk Register \(PAF Review Work stream 1\)](#)' ([PAB Paper 197/07](#)) in June 2017 to update the PAB on the smart Metering work. A high risk area was identified (medium likelihood, high impact – see PAB197/07A for further details) in relation to the Supplier-agent interface and it was recommended that the D0367 data flow should be included in the Qualification process. This CP was raised to make the necessary changes to BSCP537 Appendices 1 and 2.

Approved redlining

Attachments A and B set out the approved changes to BSCP537 Appendices 1 and 2, required to implement the proposed solution.

All respondents to the CP1500 Change Proposal Circular (CPC) consultation agreed that the redlining delivers the intent of CP1500.



What is the Performance Assurance Framework (PAF)?

One of ELEXON's role as administrator of the BSC is to monitor and ensure the compliance of all BSC Parties, within the requirements of the BSC, along with undertaking Performance Assurance activities.

This is achieved through the Performance Assurance Framework (PAF) and overseen by the Performance Assurance Board (PAB).

[For more information, see the BSC website](#)

⁵ BSCP537 covers qualification requirements for SVA and CVA and is part of ELEXON's Performance Assurance Framework

Central impacts and costs

Central impacts

CP1500 will require changes to two Code Subsidiary Documents (CSDs):

- BSCP537 Appendix 1 will be changed to include the responsibilities on Suppliers and NHHMOAs relating to the D0367 data flow to the SAD; and
- BSCP537 Appendix 2 will be changed to include the D0367 in the sets of data flows included in the Qualification testing requirements for Suppliers and NHHMOAs.

CP1500 will not impact BSC Central Systems.

Central costs

The central implementation costs for CP1500 will be approximately £240 (one ELEXON working day to implement the necessary document changes).

BSC Party & Party Agent impacts and costs

The changes will not apply to existing Suppliers, as they do not need to re-Qualify. For new Suppliers going through Qualification, demonstrating their means of sending D0367 data flows will be done alongside the other data flows they must have the ability to send. The same will apply to new NHHMOAs when Qualifying and any NHHMOAs that elect to re-Qualify.

Existing Suppliers and NHHMOAs should already be sending and receiving D0367 data flows in accordance with BSCP514, so we do not expect there to be any changes required from BSC Parties or their agents in order to be able to send or receive D0367 data flows.

One respondent to the consultation thought that they may be impacted by CP1500, however, they have since agreed that they will not be impacted.

4 Implementation Approach

Implementation Date

CP1500 was approved (see Section 7) for implementation on **28 June 2018** as part of the June 2018 BSC Release. All respondents to the CPC consultation agreed with the implementation approach.

ISG's initial views

The ISG considered the CP1500 Progression Paper at its meeting on 16 January 2018 ([ISG201/02](#))

A Member noted that previously Parties had been reluctant to share Standard Settlement Configuration (SSC) details with NHHMOAs due to data protection issues and asked if this was still an issue. ELEXON noted that it is already a requirement to send D0367 data flows to the NHHMOA.

The ISG offered no further comment.

PAB Initial views

The PAB considered the CP1500 Progression Paper at its meeting on 26 January 2018 ([PAB204/09](#))

A PAB member asked if Suppliers are mandated to send the D0367 data flow. ELEXON noted that it is a requirement in BSCP514 and added that it does not have to be provided over the DTN specifically as the BSCP states it should be sent via an 'Electronic or other method, as agreed'.

The requirement for retrospective Qualification was discussed post-implementation. ELEXON noted that this had been considered but the Code does not allow for this, and there are already assurance processes (including BSC Audit and Technical Assurance techniques) in place to monitor this activity over the course of the rollout.

SVG's initial views

The SVG considered the CP1500 Progression Paper at its meeting on 30 January 2018 ([SVG204/08](#)).

The SVG discussed whether or not testing that the D0367 can be sent and received as part of Qualification (and re-Qualification for NHHMOAs) is necessary if the Supplier (or NHHMOA) does not intend to interact with smart Meters. ELEXON responded that they believed it was a requirement as even if they did not intend to interact with smart Meters at the point of Qualification (or re-Qualification in the case of NHHMOAs), this may change in the future. This has subsequently been confirmed by ELEXON.

It was suggested that implementation could be delayed until after 2020 to tie in with the conclusion of the rollout of smart Meters. ELEXON, however, pointed out that there are already DCC serviced SMETS v2.0 Meters in operation and that there will likely be new entrants requiring Qualification between now and 2020 and, as such, they should have to demonstrate the ability to send, receive and process D0367 data flows as part of the Qualification process.

6 Industry Views

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

Summary of CP1500 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1500 proposed solution?	6	0	0	0
Do you agree that the draft redlining delivers the intent of CP1500?	6	0	0	0
Will CP1500 impact your organisation?	1	5	0	0
Will your organisation incur any costs in implementing CP1500?	1	5	0	0
Do you agree with the proposed implementation approach for CP1500?	6	0	0	0
Do you have any further comments on CP1500?	1	5	N/A	N/A

CP1500 Proposal

All respondents agreed with the proposed solution, with one adding that CP1500 will provide consistency between Parties' BSC obligations and Qualification/re-Qualification assessment and assurance, which in turn mitigates risk to the Settlement process.

Comments on the proposed redlining

One respondent asked whether or not a 'bilaterally agreed flow' with their NHHMOAs would be synonymous with a D0367 dataflow. BSCP514 states 'Electronic or other method, as agreed', which would be covered by a 'bilaterally agreed flow' with their NHHMOAs.

Additional question

One respondent asked whether or not the requirement to send and receive D0367 data flows will be included within the BSC Audit. As explained at the PAB in January (see Section 5), the risk-based approach to assurance means the relative risk of sending and receiving the flow can be considered as part of setting the annual review of the audit.

ISG's final views

The ISG considered the CP1500 Assessment Report on 20 March 2018 ([ISG203/01](#))

Retrospective Qualification was discussed and ELEXON explained that there the BSC does not allow for it. However, there are Performance Assurance Techniques (PATs) in place, such as the BSC Audit and Technical Assurance of Performance Assurance Parties (TAPAP) auditing techniques. If an increased Settlement Risk is identified via routine monitoring, the D0367 data flow processes can be audited through these techniques.

Current compliance (i.e. whether or not D0367 data flows are being sent correctly) was discussed, however, as the SMETS 2.0 Meter rollout has been limited, it is not possible to comment at this time. ELEXON has monitoring in place to ensure Parties and their agents send and receive D0367 data flows correctly.

An ISG member noted that no small Suppliers responded to CP Consultation and questioned if they are aware of the CP and surrounding issues. ELEXON responded that there will be a smart Meter rollout industry day⁶, which will include small Suppliers. This event will emphasise the requirements and ELEXON will use the opportunity to encourage testing of Supplier systems with MOAs if required. Further, ELEXON's Market Entry team communicates with new Suppliers and agents to make them aware of Qualification requirements.

SVG's final views

The SVG considered the CP1500 Assessment Report on 27 March 2018 ([SVG206/06](#))

An SVG member noted in support of changes that help to formalise the transfer of data.

PAB's final views

The PAB considered the CP1500 Assessment Report on 28 March 2018 ([PAB206/04](#))

A PAB member sought clarification of the approval process for CPs. ELEXON explained that if a document is 'owned' by more than one Committee as documented on the BSC Baseline Statement, each Committee must agree in approving or rejecting the CP. If there is a discrepancy between overall Committee views, the final decision sits with the BSC Panel.

One PAB member asked for a breakdown of the respondents in terms of large/small Suppliers and Party Agents, which ELEXON provided⁷. The PAB member noted an apparent lack of response from small Suppliers and questioned whether they could be further encouraged to engage. ELEXON responded that there will be a smart Meter rollout industry day, which will include small Suppliers. This event will emphasise the requirements of CP1500. Further, ELEXON's Market Entry team communicates with new Suppliers and agents to make them aware of Qualification requirements.

⁶ These will be held on [23 and 30 April 2018](#)

⁷ A full list of respondents are included in Attachment C

Final decision

The ISG, SVG and PAB:

- **APPROVED** CP1500 for implementation on 28 June 2018 as part of the June 2018 BSC Release.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
BSCP	BSC Procedure
CoS	Change of Supplier
CP	Change Proposal
CPC	Change Proposal Circular
CSD	Code Subsidiary Document
CVA	Central Volume Allocation
DC	Data Collector
DCC	Data Connections Company
DTC	Data Transfer Catalogue
DTN	Data Transfer Network
ISG	Imbalance Settlement Group
MOA	Meter Operator Agent
NHH	Non Half Hourly
PAB	Performance Assurance Board
PAF	Performance Assurance Framework
PAT	Performance Assurance Technique
SAD	Self-Assessment Document
SMETS	Smart Metering Equipment Technical Specifications
SSC	Standard Settlement Configuration
SVA	Supplier Volume Allocation
SVG	Supplier Volume Allocation Group
TAPAP	Technical Assurance of Performance Assurance Parties

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
D0367	Smart Meter Configuration Details

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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	Smart Energy GB webpage about rollout	https://www.smartenergygb.org/en/smart-future/about-the-rollout
2	BSCP537 Appendix 1 on BSC website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all
2	BSCP537 on BSC Website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all
2	MRA Data transfer Catalogue	https://dtc.mrasco.com/Default.aspx
3	BSCP514 on BSC Website	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/?show=all
3	Issue 69 page on BSC Website	https://www.elexon.co.uk/smg-issue/issue-69/
3	PAB Meeting 197	https://www.elexon.co.uk/meeting/pab-197/
3	Performance and Assurance page on website	https://www.elexon.co.uk/reference/performance-assurance/
7	ISG 201 Page on ELEXON website	https://www.elexon.co.uk/meeting/isg-201/
7	PAB 204 Page on ELEXON website	https://www.elexon.co.uk/meeting/pab204b/
7	SVG 204 Page on ELEXON website	https://www.elexon.co.uk/meeting/svg-204/
9	ISG 203 page on ELEXON website	https://www.elexon.co.uk/meeting/isg-203/
9	SVG 206 page on ELEXON website	https://www.elexon.co.uk/meeting/svg-206/
9	PAB 206a page on ELEXON website	https://www.elexon.co.uk/meeting/pab-206a/