

CP1421 'Linking BSCP520 obligations to the Operational Information Document'

ELEXON



Any questions?

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About This Document

The purpose of this CP1421 Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1421. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1421.

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 SVG's initial views on the proposed changes.
- Attachment A contains the CP1421 Proposal Form.
- Attachment B contains the proposed redlined changes to deliver the CP1421 solution.
- Attachment C 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.

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1 Why Change?

Background

The SVG identified a potential risk to Unmetered Supplies (UMS) Settlement accuracy, resulting from the interaction between the Balancing and Settlement Code's (BSC) Charge Code process and the Government's UMS Regulations, which as primary legislation take precedence over the BSC. A risk arises if one or more Unmetered Supplies Operators (UMSOs) agree a UMS connection without the SVG having oversight of the Charge Code, which estimates the equipment's consumption for Settlement.

The SVG identified four potential changes to the [Operational Information Document \(OID\)](#) and BSC Procedure (BSCP) [520 'Unmetered Supplies Registered in SMRS'](#) which were considered at the February 2014 Unmetered Supplies User Group (UMSUG) meeting ([UMSUG111/07](#)). One of these changes involved reviewing the balance of the requirements in BSCP520 and the OID. The OID was originally part of BSCP520 but was removed and made into a guidance document so it would be easier to change. However, as guidance, the content of the OID is not enforceable.

What is the issue?

At the February UMSUG meeting, ELEXON questioned whether the balance of BSCP520 requirements and OID guidance was appropriate or if it could be strengthened by moving some or all of the OID content back into the BSCP. For example, the current OID wording about using 'local' Miscellaneous Charge Codes only has the status of guidance rather than a BSC requirement which leaves it open to interpretation. The UMSUG therefore agreed that a subset of UMSUG Members should review what OID content should be moved to BSCP520 and what should remain as guidance.

While initially envisaged as a 'quick win', these discussions identified potential issues with moving OID content back into the BSCP. The sub-group agreed that it was not efficient to duplicate the information in two places and that the two documents are aimed at different audiences. For example, guidance on testing requirements for manufacturers should stay in the OID as they would not look for this in the BSCP. Similarly, the BSCP cannot place obligations on manufacturers as they are not BSC Parties.

Following the UMSUG sub-group's discussion, and further discussion at the UMSUG meeting in August 2014 ([UMSUG112/03](#)), the UMSUG recommends that the existing wording of section 1.2 of BSCP520 is amended to:

- include key areas of responsibility on which the BSCP is currently silent; and
- link the BSCP obligations more strongly to the OID.

This section of the BSCP already sets out the responsibilities for UMSOs, Suppliers, Non Half Hourly Data Collectors (NHHDCs) and Meter Administrators (MAs).

Proposed solution

CP1421 '[Linking BSCP520 obligations to the Operational Information Document](#)' proposes to amend section 1.2.5 of BSCP520 to provide sufficient 'hooks' to the OID in a way that:

- strengthens the BSCP requirement in areas where it is currently silent (e.g. on testing requirements and the intention of 'local' versus 'national' Charge Codes);
- recognises that the BSCP cannot place obligations on non-BSC Parties such as manufacturers;
- avoids duplication between the two documents and retains an appropriate split between requirements and guidance;
- retains the ability to update the OID more flexibly than the BSCP, and at the same time avoids the need for constant OID updates¹; and
- avoids any conflict with UMSOs' ability to provide UMS connections under the [Electricity \(Unmetered Supplies\) Regulations 2001](#).

The OID guidance will be unchanged by this CP, and will continue to be updated periodically as recommended by the UMSUG and approved by the SVG.

Proposer's rationale

The proposed changes have been reviewed by both the UMSUG and its sub-group, who have recommended that this CP be raised. However, it should be noted that although this CP will address the identified defect now, the proposed changes may need further consideration in the longer-term. This is because the content of both BSCP520 and the OID may be impacted by further changes to resolve this issue.

CP Consultation Question

Do you agree with the CP1421 proposed solution?

Please provide your rationale.

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

Proposed redlining

The proposed changes to BSCP520 to deliver CP1421 can be found in Attachment B.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1421 proposed solution?

If 'No', please provide your rationale.

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

¹ i.e. it allows ELEXON and the UMSUG to continue to 'batch up' OID changes for periodic SVG approval. A BSCP requirement for ELEXON to use only those Charge Code conventions set out in the OID could require monthly updates to this document due to advances in technology and equipment.

3 Impacts and Costs

Central impacts and costs

Central impacts

CP1421 will require updates to BSCP520 to implement the proposed solution. No system changes will be required for this CP.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP520	<ul style="list-style-type: none">None

Central costs

The central implementation costs for CP1421 will be approximately £240 (1 man day) for ELEXON to implement the relevant document changes. There are no BSC Agent costs or impacts.

BSC Party & Party Agent impacts and costs

CP1421 is not expected to impact BSC Parties or Party Agents as this is a consequential update to BSCP520 in response to changes recommended by the UMSUG.

CP Consultation Questions

Will CP1421 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 CP1421 and the CP1421 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 CP1421?

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 C

4 Implementation Approach

Recommended Implementation Date

CP1421 is proposed for implementation on **26 February 2015** as part of the February 2015 BSC Systems Release, as this is the next available Release.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1421?

Please provide your rationale.

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

5 Initial Committee Views

SVG's initial views

The SVG considered CP1421 at its meeting on 30 September 2014 ([SVG164/06](#)). It had no initial comments on the proposed changes. However, it noted that its approval to hold an UMSUG meeting on 11 November 2014 will allow the UMSUG to consider any comments from the industry responses before CP1421 is taken to the SVG for decision at its meeting on 2 December 2014.

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>document</i>)
BSCP	Balancing and Settlement Code Procedure (<i>document</i>)
CP	Change Proposal
DC	Data Collector (<i>Party Agent</i>)
MA	Meter Administrator (<i>Party Agent</i>)
NHH	Non Half Hourly
OID	Operational Information Document (<i>document</i>)
SVG	Supplier Volume Allocation Group (<i>Panel Committee</i>)
UMS	Unmetered Supplies
UMSO	Unmetered Supplies Operator
UMSUG	Unmetered Supplies User Group

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	Charge Codes and Switch Regimes page on the ELEXON website (OID)	http://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/charge-codes-and-switch-regimes/
2	BSCPs page on the ELEXON website (BSCP520)	http://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	UMSUG111 page on the ELEXON website	http://www.elexon.co.uk/meeting/umsug-111-2/
2	UMSUG112 page on the ELEXON website	http://www.elexon.co.uk/meeting/umsug-112/
3	CP1421 page on the ELEXON website	http://www.elexon.co.uk/change-proposal/cp1421/
3	Electricity (Unmetered Supplies) Regulations 2001 page on Government website	http://www.legislation.gov.uk/ukxi/2001/3263/regulation/3/made

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