Final CP Report

CP1523 'BSCP501 Amendments to Clarify D0312 Process'

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About This Document

This document is the CP1523 Final CP Report which ELEXON has published following the final decision from the SVG to approve CP1523.

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 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.
- Attachment A contains the CP1523 proposal form.
- Attachment B contains the approved redlined changes to deliver the CP1523 solution.
- Attachment C contains the full responses received to the CP Consultation.

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1 Why Change?

What is the Issue?

It is not clear in BSCP501 'Supplier Meter Registration Service' that the Supplier Meter Registration Services (SMRSs) should not send the Data Transfer Catalogue (DTC) data flow D0312 'Notification of Meter Information to Meter Point Administration Service (MPAS[1])' to a Supplier that has been end dated in Market Domain Data (MDD).

Change Proposal (CP) CP1515 'Meter Operator Agents to send Metering System Data to SMRS instead of ECOES for the Faster Switching Programme' was implemented on 27 June 2019. CP1515 amended BSCP501 to require Meter Operator Agents (MOAs) to send a D0312 to SMRS following a change of Metering System information. It also requires SMRS to send a response D0312 to the originating MOA, the current Supplier and the Supplier responsible for the Meter at the time of the Metering work.

SMRSs are experiencing issues when a response D0312 data flow is sent to a Supplier that has been end dated in MDD. Despite the Supplier being responsible for the Meter at the time of the Metering work, where that Supplier has been end dated in MDD, the Gatekeeper™ software used to validate the D0312 can no longer recognise this Supplier. This causes the file to fail, resulting in a system call-out - i.e. an IT System Administrator had to be called to resolve the issue, costing time and effort.

This defect was raised at the Master Registration Agreement (MRA) Service Company Issue Resolution Expert Group (IREG) under MRA Issue Form 300. The IREG agreed it was an industry issue and raised DTC CP 3570 'Amend DTC Annex C Rules to expand D0312 Rule 11 to exclude the sending of a D0312 to a Supplier who has been ended in MDD' to address it. DTC CP 3570 amended Annex C of the DTC to note that where the Supplier at the time of the Meter work had been end-dated in MDD, the data flow should only be sent to the current Supplier and the MOA and will be implemented in February 2020.

BSCP501 needs to be aligned with the DTC change.

Background

The D0312 process ensures the most up-to-date information on a Metering System is available to industry and interested parties. Historically, MOAs were required to send Metering System information directly to the Electricity Central Online Enquiry Service (ECOES) platform.

CP1515 was implemented in the June 2019 BSC Release in conjunction with DTC CP 3554 'Update of Meter Details to MPAS'. These changes were implemented to facilitate Stage 0 of Ofgem's Faster Switching Programme, specifically that the SMRS becomes the main repository of all Metering System data from 27 June 2019.

Supplier Meter Registration Service (SMRS)

Is the service provided by a Licensed Distribution System Operator (LDSO) for the registration of Metering Systems at Boundary point on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement. The Master Registration Agreement refers to SMRS as the Meter Point Administration Service.

Meter Operators

A Meter Operator is abbreviated to 'MOA' in BSC Subsidiary Documents and to 'MOP' in MRA Agreed Procedures

Supplier Meter Registration Agent (SMRA)

SMRA means a Licensed Distribution System Operator acting in its capacity as the provider of a Supplier Meter Registration Service

[1] MPAS is a Master Registration Agreement (MRA) term; the BSC uses 'SMRS' in BSCP501 and 'SMRA' in BSCP514 as equivalent terms to MPAS.

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2 Solution

Proposed solution

CP1523 proposes to amend BSCP501 to align with DTC CP 3570. Amend the 'Action' column of sections 3.2A.3 and 3.2A.6 of BSCP501 to include the following text:

"*Do not send the response D0312 to a Supplier that has been end dated in MDD; it should only be sent to the MOA and the current Supplier.*"

Proposer's rationale

This solution will ensure that an SMRS will not issue a D0312 to a Supplier that has been end dated in MDD, removing a potential cause of increased costs and wasted time for Parties related to the D0312 process in the form of system call-outs. This will improve the efficiency of the process introduced for Stage 0 of Ofgem's Faster Switching Programme and ensure BSCP501 remains aligned with the MRA.

Approved redlining

Attachment B contains the approved changes to BSCP501 to deliver CP1523.

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3 Impacts and Costs

Central impacts and costs

Central impacts

Document only changes will be required to deliver the CP1523 solution.

Central Impacts	
Document Impacts	System Impacts
• BSCP501 – 'Supplier Meter Registration Service'	• No BSC Central System Impacts

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
This CP will have a positive impact on Risk 004 'changes to SVA Metering Equipment are not notified, such that all members of the Supplier Hub do not use the current Meter Technical Details' and Risk 006 'On a Change of Agent, Meter Technical Details are not transferred or processed correctly or at all, such that parties do not use the latest Meter Technical Details'. It will streamline the process for reporting changes to Metering System details. A full description of all Settlement Risks can be found on the Risk Evaluation Register.

Central costs

The central implementation costs for CP1523 will be approximately £240 (one ELEXON Working Day (WD)) of effort to implement document changes.

BSC Party & Party Agent impacts and costs

The only Party Agents expected to be impacted by CP1523 are SMRAs, but only to align with DTC CP 3570. All respondents indicated they would not be impacted and consequently would not incur costs for implementing CP1523, as the costs will have been borne by DTC CP 3570.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
SMRA	Places an obligation on SMRAs to comply with the changes to D0312. No process changes are expected as SMRAs will have amended them in anticipation of DTC CP 3570.
Supplier	For the avoidance of doubt, Suppliers will not be impacted by CP1523 as they already receive D0312s under current processes.

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4 Implementation Approach

Implementation Date

CP1523 will be implemented on 25 June 2020 as part of the June 2020 BSC Release.

The June 2020 BSC Release is the first available Release following the expected CP1523 approval date that can include this CP. The discrepancy between the Implementation Dates of CP1523 and DTC CP 3570 is not anticipated to negatively impact market participants as the necessary process changes will be introduced for the DTC CP. CP1523 will further improve clarity and reduce any potential confusion for market participants. All respondents to the CP Consultation supported the Implementation Date.

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5 Initial Committee Views

SVG's initial views

CP1523 was presented to the SVG for information and comment on 3 December 2019 (SVG 226/06).

An SVG Member asked why SMRS are sending data flows to Suppliers that have been end-dated in MDD. Following the meeting, the Proposer highlighted that the automated systems were designed around the CP1515 solution which did not take into account this particular scenario.

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6 Industry Views

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

Summary of CP1523 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1523 proposed solution?	4	0	0	0
Do you agree that the draft redlining delivers the intent of CP1523?	3	0	1	0
Will CP1523 impact your organisation?	0	3	1	0
Will your organisation incur any costs in implementing CP1523?	0	3	1	0
Do you agree with the proposed implementation approach for CP1523?	3	0	1	0
Do you have any further comments on CP1523?	1	3	0	0

There were four respondents to the consultation for CP1523. These respondents accounted for Distributors, Supplier Agents and a Supplier.

Initially, only three of the four respondents supported the proposed solution, with one opposing it. However, during discussions with the respondent, they stated that they are supportive of both the intent and solution of CP1523, but have been frustrated with a perceived lack of post-implementation deliverables following DTC CP 3554. They made specific reference to the rejected proposal of an MRA Agreed Procedure (MAP) to document the Supplier process that they feel would be beneficial as various Parties are having potential issues in this area. They argued that further changes to the process should not be made until the ongoing issues are resolved. ELEXON highlighted that CP1523 is aligning the BSC with the MRA Annex C changes and that their concerns, while valid, do not apply to this CP. ELEXON agreed to raise this concern at the SVG to ensure their views were heard by the industry. Consequently, the Party agreed to change their initial view and so support this CP.

It should be noted that the Proposer has withdrawn their comments from Question 5 of the consultation in respect of the Implementation Date. They highlighted that their original intention was that this CP should be implemented in the 27 February 2020 Release – i.e. at the same time as the DTC CP. However, they respect the time limitations and support the 25 June 2020 Release date.

The further comments provided by one respondent pertained to their original comment regarding issues with DTC CP 3554 implementation and are discussed above.

Comments on the proposed redlining

None of the respondents provided any comments on the proposed redlining for CP1523.

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7 Final Committee Views and Decision

SVG's final views

CP1523 was presented to the SVG for decision on 4 February 2020 (SVG 228/04).

ELEXON informed the SVG that it had followed-up on the query made at its meeting in December regarding why SMRS currently sends D0312 flows to Suppliers that are end-dated in MDD. ELEXON went on to explain that it had discussed this with the Proposer and were told that the automated systems were designed around the CP1515 solution, which had not considered this particular scenario. An SVG Member felt this was an unsatisfactory response and was not comfortable with the potential of a precedent being set around raising changes to the BSC to enforce industry change where they are capable of doing so without. However, due to the low costs involved with the implementation of CP1523, they felt it would not be beneficial to oppose approving the change.

Another Member noted their disappointment with the relatively low number of industry responses to the consultation. The SVG discussed potential reasons for this, with some highlighting that many participants may be aware of CP1523 and simply approving by silence. A Member noted that as CP1523 is a consequential change, much of the industry discussion around its merits may have already been done during DTC CP 3554. The Chair noted the Committee's concerns and highlighted that ELEXON's Customer Operations team is working with BSC Change Management to increase industry participation in the Change process.

Final decision

The SVG have:

- **APPROVED** CP1523 for implementation on 25 June 2020 [as part of the June 2020 BSC Systems Release].
- **APPROVED** the proposed changes to BSCP501 for CP1523.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
ECOES	Electricity Central Online Enquiry Service
DTC	Data Transfer Catalogue
SVG	Supplier Volume Allocation Group
CP	Change Proposal
CPC	Change Proposal Circular
MOA	Meter Operator Agent
MPAS	Meter Point Administration Service
SMRS	Supplier Meter Registration Service
SMRA	Supplier Meter Registration Agent
MDD	Market Domain Data
MRA	Master Registration Agreement
MDB	MRA Development Board
MOP	Meter Operator
WD	Working Day

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
D0312	Notification of Meter Information to Meter Point Administration Service (MPAS)

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	CP1515	https://www.elexon.co.uk/change-proposal/cp1515/
2	BSCP501	https://www.elexon.co.uk/csd/bscp501-supplier-meter-registration-service/

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External Links		
Page(s)	Description	URL
2	DTC CP 3570	https://www.mrasco.com/changes/change-tracker/amend-dtc-annex-c-rules-to-expand-d0312-rule-11-to-exclude-the-sending-of-a-d0312-to-a-supplier-who-has-lost-their-supplier-licence-and-has-been-ended-in-mdd/
2	ECOES	https://www.mrasco.com/ecoes/
2	DTC CP 3554	https://www.mrasco.com/changes/change-tracker/update-of-meter-details-to-mpas/
2	Ofgem Faster Switching Programme	https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme
4	Risk Evaluation Register	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/performance-assurance-risk-evaluation-register/
7	SVG 226	https://www.elexon.co.uk/meeting/svg226/

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