

CP Consultation

CP1558 'New Registration data items and processes to support the MHHS transition'

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About This Document



Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments
- *You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#)¹*

The purpose of the second Change Proposal (CP)1558 Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1558 and review the redlining on the re-baselined version of BSCP501. The Supplier Volume Allocation Group (SVG) will then consider the consultation responses before making a decision on whether or not to approve CP1558.

There are seven 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 CP proposal form.
- Attachments B-D contain the proposed redlined changes to deliver the CP1558 solution.



Committee

Supplier Volume
Allocation Group



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¹ <https://www.elexon.co.uk/glossary/?show=all>

- Attachment E 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.
- Attachment F contains the responses to the first consultation.

1. Summary

Why change?

In its consultation on the [Detailed MHHS Target Operating Model Design, Data Items and Processes](#)² in December 2020, the [Code Change and Development Group \(CCDG\)](#)³ set out the Registration Service data items needed for Market-wide Half-Hourly Settlement (MHHS) to form part of the Design Baseline to be published in **April 2022**. However, it was concerned that starting migration to MHHS in **October 2024** with poor quality underlying data will lead to avoidable time and effort being spent trying to fix issues during the twelve month migration period, leading to delays.

Solution

In its [MHHS transition consultation](#)⁴ published in July 2021, the CCDG recommended that a subset of the Registration Service data items required for MHHS are introduced in **February 2023**, about 18 months before migration is due to commence in **October 2024**. This is because these items are critical to the MHHS rules and processes.

This CP relates exclusively to data items provided and notified by a Licensed Distribution System to a Supplier Meter Registration Agent (SMRA) and will require the additional data items to be integrated into existing process steps in BSCP501 and BSCP515 as follows:

- 'New Connection for SVA Metering System' (BSCP501 section 3.6 and 3.10 and BSCP515 section 3.3) to allow the items to be set for new Supplier Volume Allocation (SVA) Metering Systems.
- 'Update of SMRS Database by Licensed Distribution System Operator' (BSCP501 Section 3.2) to allow the items to be amended by the Licensed Distribution System Operators (LDSO) where required.

This CP will not require population of these items for all existing SVA Metering Systems as part of implementation. That activity will be coordinated separately by the Market Wide Half Hourly Settlement Programme (MHHSP) once the new data items have been introduced.

Impacts and costs

This CP is expected to impact SMRAs and LDSOs.

This CP is a document only change and will impact BSCP501 'Supplier Meter Registration Service' and BSCP515 'Licensed Distribution', with no central system changes required.



Market-wide Half Hourly Settlement

Ofgem is introducing Half Hourly Settlement on a market-wide basis in order to realise the full benefits of settlement reform. The successful introduction of MHHS is a key component of Ofgem's work to facilitate decarbonisation and smarter, more flexible energy sector.



CCDG

The CCDG is a working group that developed the detailed design areas of the Design Working Group's (DWG's) Target Operating Model (TOM), following the initial works done by the DWG. The group also further developed the transition approach, also accounting for run-off of the existing (Non Half Hourly) NHH arrangements. CCDG was initially responsible for the code changes (including subsidiary documents), however this is now the responsibility of the MHHS Programme's Cross Code Advisory Group.

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² <https://www.elexon.co.uk/documents/industry-consultations/2020-industry-consultations/code-change-development-group-on-mhhs-consultation-tom-17dec2020/>

³ <https://www.elexon.co.uk/group/code-change-and-development-group-ccdgc/>

⁴ <https://www.elexon.co.uk/consultation/ccdg-consultation-on-transition-approach-for-mhhs/>

The central implementation costs for this CP will be less than £1,000 to implement the relevant document changes.

Implementation

This CP is recommended for implementation on **23 February 2023** as part of the standard February 2023 BSC Release. This is the earliest practicable BSC release following the implementation of the Central Switching Service (CSS) in mid-2022.

2. Why Change?

What is the issue?

In December 2020 the CCDG set out the Registration Service data items needed for MHHS to form part of the Design Baseline to be published in **April 2022**. However, it was concerned that starting migration to MHHS in **October 2024** with poor quality underlying data would lead to avoidable time and effort being spent trying to fix issues during the twelve month migration period, leading to delays.

Background

In its [MHHS transition consultation](#)⁵, the CCDG recommended that a subset of Registration Service data items required for MHHS are introduced in **February 2023**, about 18 months before migration is due to commence in **October 2024**. This is because these items are so critical to the MHHS rules and processes that going live with poor quality data would lead to avoidable time and effort being spent fixing issues during the 12 month migration period, leading to delays.

The CCDG recommended that these critical data items and supporting BSC processes are introduced into existing Supplier Meter Registration Service (SMRS) systems in **February 2023** to allow sufficient time for them to be back populated for all SVA Metering Systems.

The CCDG has done further pre-work to identify and define the impacts to interfaces and market messages, supported by SMRAs. That activity also involved defining changes to the D0312 'Notification of Meter Information to MPAS' data flow to allow additional items to be updated by SVA Meter Operator Agents. These changes will be progressed under a separate Retail Energy Code (REC) change, including a change to the Energy Market Data Specification (EMDS) and are not part of this CP.

In addition to the new data items and processes introduced by this CP from **February 2023**, supporting activities will be needed to populate values for existing SVA Metering Systems, and a period of data cleanse in the lead up to the migration to MHHS. These activities are expected to commence in late 2022 and run through to mid-2024 and are not covered by this CP. They will be coordinated by the MHHS Programme beginning in Q2 of 2022, and we will provide clarity on these proposals in a subsequent consultation.

The CCDG and MHHSP recognise that the proposed Implementation Date of 23 February 2023 will be challenging for all impacted participants given the implementation of the Switching Significant Code Review (SCR) in mid-2022. Impacts on the industry will be continually re-assessed as more detail becomes available.

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⁵ <https://www.elexon.co.uk/consultation/ccdg-consultation-on-transition-approach-for-mhhs/>

Proposed solution

The Retail Energy Code (REC) has raised the change [R0032 'New Registration data items and processes to support the transition to MHHS'](https://recportal.co.uk/group/guest/-/new-registration-data-items-and-processes-to-support-the-transition-to-mhhs)⁶. This BSC CP and R0032 will collectively deliver the CCDG's transition recommendation as follows:

This CP will:

- Create Connection Type, Connection Type Effective From Date (EFD) and Associated Import/Export Metering System Identifier (MSID) as new BSC owned data items in the EMDS.
- Recognise Energy Direction and Metered Indicator in BSCP501 and BSCP515.
- Modify existing processes in BSCP501 and BSCP515 to require that these data items are populated on connection of a new SVA Metering System and can be amended if the LDSO is made aware of a change or an incorrect value.

R0032 will:

- Implement changes to the D0312 dataflow.
- Create Electricity Smart Meter Equipment (ESME) Id and Number of Displayed Register Digits as new REC owned data items in the Data Specification
- Make changes to the Electricity Enquiry Service (EES, a.k.a. ECOES) to display all new data items (BSC and REC owned) introduced by both CPs
- Consider data access requirements for new items for EES Users (GUI and API), particularly the implications of ESME ID (Smart Meter security).

LDSO mastered data items and processes

The new data items introduced by this CP will be mastered by the LDSO and set at the point of connection of a new SVA Metering System. The LDSO may subsequently identify or be notified of incorrect values by other participants following routine site visit activity, which will require the new items to be updated using the existing BSC process.

Connection Type (DInew)

This data item will identify the physical connection as one of four valid types for metered supplies: Whole Current (W), Low Voltage (LV) Current Transformer (L), High Voltage (HV) Current Transformer (H) or Extra High Voltage (EHV) Current Transformer (E).

It may also include a value of 'U' for unmetered connections to avoid ambiguity, should NULL or W be considered not appropriate.

Connection Type Effective From Date (DInew)

This is the date and time from which the value for Connection Type became effective

Connection Type Effective To Date (DInew)

This is the date and time to which the value for Connection Type remains effective

Associated Import/Export MSID (DInew)

This will create a relationship between the import MSID and export MSID at a particular site to identify where common processes are needed for both Metering Systems.

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⁶ [https://recportal.co.uk/group/guest/-/new-registration-data-items-and-processes-to-support-the-transition-to-market-wide-half-hourly-settlement-mhhs-](https://recportal.co.uk/group/guest/-/new-registration-data-items-and-processes-to-support-the-transition-to-market-wide-half-hourly-settlement-mhhs)

Energy Direction a.k.a. *meteringPointEnergyFlow* (DI90033)

This is currently derived by the Electricity Online Enquiry Service (ECOES) based on the assigned Line Loss Factor Class (LLFC), but it should be set by the LDSO as an item in its own right. Energy direction is known at the point of connection, and it determines the relevant LLFC for Distribution Use of System (DUoS) charging, rather than the reverse.

The Central Switching Service (CSS), once live in mid-2022, will consume this item and so any impacts on that system must be considered.

Metered Indicator a.k.a. *meteringPointMeteredInd* (DI90035)

This data item already exists 'virtually' in SMRS and is sent to the Central Switching Service (CSS) to differentiate between metered and unmetered MSIDs, but it is not yet recognised in standard BSC processes, which still use Measurement Class (MC).

As all Unmetered Supplies (UMS) MSIDs will be settled HH under MHHS, there will no longer be a need to differentiate NHH UMS (MC B) from HH UMS (MC D). Once the MHHS transition is complete, MC will become redundant and can be discontinued.

The CCDG's understanding is that the new data items proposed by this CP are already being maintained by LDSOs for their own records under existing obligations but they are not notified to SMRS or the EES.

Proposals for data population and cleanse following implementation

Once the new data items have been implemented, a period of data cleanse will need to be carried out under the oversight of the MHHS Programme. The requirements for this will be developed during Q1 of 2022, but some initial thinking has been set out below:

- The EES will need to be able to receive and display the new data items introduced by both this CP and R0032. This will be progressed and impact assessed as part of the related REC change.
- Monthly cleansing reports will need to be produced from the implementation of this CP and R0032 and initial population, through to the near completion of migration.
- These monitoring reports have not yet been defined, but will include the new data items and existing data items to enable recipients to validate and reconcile data to ensure the data is complete and accurate as far as is possible.
- Where items are currently being derived in the EES from other items (for example, Energy Direction is derived from LLFC Id), these should be fed directly from the new data items in SMRS or the Electricity Retail Data Service (ERDS) to ensure that we achieve our goal of a 'single view of the truth' from as early as possible.

Once these new registration data items, supporting interfaces and processes have been introduced, the CCDG recommended a period of centrally coordinated data cleanse activity running from February 2023 to October 2024. This will ensure that the data items introduced by this CP and R0032 that are critical to a successful migration and fundamental to MHHS will be as accurate as possible when migration starts in **October 2024**.

Further thinking on initial population and data cleanse following the first consultation

Some respondents to the first CP1558 consultation provided suggestions as to how best to approach the initial population and data cleanse. The MHHS Programme has considered these and provided its own updated thinking set out below, and is seeking further views as part of this consultation on the proposed implementation approach.

Connection Type

A respondent suggested that a Connection Type of U for Unmetered should form part of the set of valid values, on the basis that Whole Current or CT refers to how a site is metered and unmetered is distinct as there is no meter. The MHHS notes that this would create a degree of duplication with Metered Indicator, but accepts that this would add useful clarity.

A respondent queried the absence of a Connection Type Effective To Date for a change of connection type. The MHHS's expectation is that this could be inferred from the Effective From Date each time it is set by the LDSO, but agrees that this would be a useful addition.

Several respondents asked or suggested possible rules for the initial back population of the Connection Type based on the following assumptions:

- **MSIDs in Non Half Hourly (NHH) Profile Classes (PCs) 3 and 4** will be a mix of whole current and low voltage (LV) CT, and these are the MSIDs most impacted by P432. These MSIDs would therefore be the best candidates for the first wave of data cleanse activity, followed by MSIDs in NHH PCs 5 to 8, which should be predominantly LV CT.
- **MSIDs in HH Measurement Class G** (Sub 100KW Non Domestic WC) should be safely assumed to be whole current based on the definition of this Measurement Class unless known exceptions are identified from the Meter Technical Details (MTDs).
- **Unmetered MSIDs** (Measurement Classes A and B) can be set to a Connection Type of 'U' or NULL without extensive further review or cross referencing, except for cases where Measurement Class and Metered Indicator do not match.
- **Measurement Classes C and E** should be predominantly CT, with a mix of LV/HV in MC E and LV/HV/EHV in MC C. It may be possible for LDSOs to infer a voltage level from the LLFC Id, but this will need to be confirmed by cross-referencing with the MTDs.

The population and data cleanse approach is expected to entail LDSOs providing an initial view of Connection Type based on their records, which can then be shared with Suppliers and Meter Operator Agents (MOAs) to cross reference against information contained in the MTDs such as CT Ratio and Voltage Transformer (VT) Ratio. The most time intensive MSIDs are expected to be those in NHH PCs 3 and 4, where data is lacking and of poor quality, but these MSIDs are where the benefits of CP1558 will be realised most readily.

Elxon expects that the MHHS System Integrator (SI) will coordinate the initial population and data cleanse and distribute a file to each SMRS to load as part of their implementation. The MHHS Programme will work towards the planned implementation timeline and ensure it provides appropriate support to industry and aligns these activities to the MHHS plan.

Energy Direction

No specific considerations have been given to this data item on the basis that an initial population and cleanse was done for the Switching Programme. However, should there be any concerns about its accuracy, the MHHS would be keen to support further cleansing.

Associated Import/Export MSID

A respondent queried whether the import export association could only ever be one to one or whether it could be one to many. The expectation is that an export MSID will only ever be associated with a single import MSID. Where there is more than one import MSID forming a related pair, the export MSID will be associated with the primary import MSID and vice versa.

Another respondent asked how this association information would be sent from Suppliers to MOAs. This association will be included in the relevant interfaces being developed for MHHS and implemented as part of the enduring design. CP1558 seeks to introduce this item ahead of MHHS implementation to enable it to be populated and cleansed, but it will not be sent in dataflows or exchanged outside of SMRS or ECOES prior to that point.

Metered Indicator

A respondent asked for clarification whether this item should be set for MSIDs with no meter installed but which are not UMSO serviced. Elexon's understanding of the Switching design is that such Metering Systems are still considered Metered because the expectation is that a meter will be installed, and they lack any alternative means of measuring consumption.

CP Consultation Question

Do you have any comments or suggestions for the initial population and data cleanse that you think the MHHS Programme should consider?

Please provide your rationale.

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

Proposer's rationale

This CP will deliver Recommendation 1 by the CCDG, as set out in its Consultation on the Transition Approach for MHHS.

Given the importance of the MHHS Programme, the early introduction of these key registration items will allow a sufficiently long period of data cleanse, which in turn will significantly de-risk the migration activities due to commence in late 2024.

CP Consultation Question

Do you agree with the CP1558 proposed solution?

Please provide your rationale.

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

Proposed redlining

The proposed redlining to BSCP501 and BSCP515 for this CP can be found in Attachments B-D of this paper.

Interactions with REC 3.0

[P436 'Consequential BSC changes for Switching SCR \(REC 3.0\)'](#)⁷ will progress the consequential BSC changes needed to align with REC 3.0. REC 3.0 will transfer new obligations and processes formerly in the MRA into BSCP501, which has an interaction with this CP.

This CP has therefore been re-baselined (updated redlining) against the REC 3.0 baseline. This baseline was approved by the Panel at its meeting on [14 April 2022](#)⁸ but it is still awaiting approval by Ofgem (a decision is expected imminently). Therefore we have provided two versions of the BSCP501 redlining, one with the REC 3.0 baseline (subject to approval) and one with the current live version of BSCP501. If P436 is rejected by Ofgem then the redlining on the current version of BSCP501 will be used for CP1558, if it is approved then the REC 3.0 baseline of BSCP501 will be used.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1558 proposed solution?

If 'No', please provide your rationale.

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

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⁷ <https://www.elexon.co.uk/mod-proposal/p436/>

⁸ <https://www.elexon.co.uk/meeting/bsc-panel-325/>

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
LDSOs	May incur costs associated with updating internal records and procedures to capture/record the new data items and the ongoing maintenance of these data items.
SMRAs	May incur costs associated with receiving and processing (including validating) the new data items.

Central impacts and costs

Central impacts

This CP will only impact BSC documentation. No BSC Central Systems will be impacted.

Central Impacts	
Document Impacts	System Impacts
BSCP501 'Supplier Meter Registration Service' ⁹ BSCP515 'Licensed Distribution' ¹⁰	None

Central costs

The central implementation costs for CP1558 will be approximately £1,000 to implement the relevant document changes

CP Consultation Questions

Will CP1558 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 CP1558 and the CP1558 Implementation Date (including any necessary changes to your systems,

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⁹ <https://www.elexon.co.uk/csd/bscp501-supplier-meter-registration-service/>

¹⁰ <https://www.elexon.co.uk/csd/bscp515-licensed-distribution/>

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 CP1558?

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 E

5. Implementation Approach

Recommended Implementation Date

This change is recommended for implementation for 23 February 2023 as part of the standard February 2023 BSC Release.

We have received some responses from the first consultation advising against implementing CP1558 on 23 February 2023 and suggesting that June 2023 may be more suitable so that it does not overlap with the early life support of the Faster Switching Programme. However, Elexon recommends this CP is implemented in February 2023. If the Implementation Date is delayed there will be less time available for the data cleansing activities that will follow. Furthermore the Modification [P432 'Half Hourly Settlement for CT Advanced Metering Systems'](#)¹¹ is also materially impacted by CP1558, as the Connection Type data item will be used for the compliance monitoring aspects of P432.

In this regard this CP, P432 and R0032 all have a dependency on the EES element of the REC change, and so if R0032 cannot be implemented in February 2023 then the new items introduced by CP1558 will not be visible through the EES. As a contingency, the MHHS Programme has suggested that some of the data cleanse could be initiated prior to the implementation of CP1558 to improve the quality of the initial population.

In particular, the initial cleanse and population could focus on the Metering Systems where the uncertainty as to the connection type is greatest and on which P432 has a dependency. This would enable the Change of Measurement Class (CoMC) activity required for P432 to commence in March 2023 even if CP1558 were to be implemented in June 2023.

A suggested prioritisation sequence has been set out in section 3 on the initial population and data cleanse. Elexon and the MHHS Programme would welcome views and comments as to whether this approach is appropriate and pragmatic given the implementation timeline.

CP Consultation Question

Do you prefer February 2023 or June 2023 for the implementation approach for CP1558?

Please provide your reasons, including any changes to the risks and impacts between the two implementation approaches.

Can you deliver CP1558 in February 2023?

If 'No', please provide your reasons, giving reference to any risks, issues and costs.

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

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¹¹ <https://www.elexon.co.uk/mod-proposal/p432/>

6. Initial Committee Views

SVG's initial views

The CP1558 Progression Paper (SVG253/07) was presented to the SVG at its meeting on [1 March 2022](#)¹². SVG had no comments on the CP or the timetable for progression.

The CP1558 responses from the first consultation were presented to the SVG at its meeting on [3 May 2022](#)¹³ (SVG255/07). One Member highlighted that there was a common theme from respondents that the implementation date for CP1558 should be delayed. Another Member raised their concern that P432 could not be implemented if the Implementation Date for CP1558 is delayed.

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¹² <https://www.elexon.co.uk/meeting/svg253/>

¹³ <https://www.elexon.co.uk/meeting/svg255/>