

CP Assessment Report

CP1559 Complex Sites Process Improvements

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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](#)*

This document is the Change Proposal (CP) Assessment Report for CP1559 which Elexon will present to the SVG at its meeting on 3 May 2022. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1559.

There are 5 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 and the views of respondents to the CP Consultation.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1559 solution.



Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

3 November 2022
(November 2022 Release)



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- Attachment C contains the newly drafted BSCP502 Appendix A 'Complex Site Supplementary Information Form'.
- Attachment D contains the full responses received to the CP Consultation.

1. Summary



What is a Complex Site?

Sites at which the Metering Technical Details (which provide the HHDC with the information needed to collect data from the Meters and allocate it to Metering Systems for purposes of Settlement) are too complex to be captured in the standard D0268 'Half Hourly Metering Technical Details' data flow

Why change?

The [Issue 88 'Clarification of BSC Arrangements relating to Complex Sites'](#)¹ Workgroup recommended a number of changes to clarify ambiguities in the Complex Site process. Existing arrangements were seen to cause confusion as to what information should be provided and when, meaning different parties interpreted what they received differently. This could potentially lead to incorrect data being submitted to Settlement. Metering Systems comprised within a Complex Site are often submitting large quantities of energy into Settlement. Lack of clarity in the Complex Site process increases the chance of errors associated with these Metering System Identifiers (MSIDs), which has resulted in large scale Trading Disputes

Impacts and costs

This is a document-only change that will impact Half Hourly Data Collectors (HHDCs), SVA Meter Operator Agents (MOAs), Suppliers and Distribution System Operators (DSOs). Impacts on participants are not expected to incur any costs. Central implementation costs are expected to be <£2k.

Cross-Code Impacts

The Complex Sites process is detailed in [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)² and Retail Energy Code (REC) Schedule 14 'Meter Operations'. As such, CP1559 is being progressed alongside [R0018 'Complex Sites Process Improvements'](#)³ to ensure the changes are reflected in all relevant documentation. The two changes will both be circulated for consultation in March 2022.

Implementation

Elxon recommends CP1559 is implemented on 3 November 2022 as part of the November 2022 standard BSC Release. This is aligned with the implementation date of R0018.

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¹ <https://www.elxon.co.uk/smg-issue/issue-88/>

² <https://www.elxon.co.uk/csd/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/>

³ <https://recportal.co.uk/group/quest/-/complex-sites-process-improvements>

2. Why Change?

[Issue 88 'Clarification of BSC Arrangements relating to Complex Sites'](#)¹, raised by Elexon, sought to clarify ambiguities related to the Complex Site process, and identify areas for improvement. This CP focuses on the Issue 88 workgroup's recommendations related to general process inefficiencies. The workgroup determined that:

- The Complex Site Supplementary Information Form (CSSIF) is not explicitly mandated, resulting in crucial information being missed from non-standard CSSIF's and creating challenges for Half Hourly Data Collectors (HHDCs) to interpret differing formats of CSSIF.
- The CSSIF has not been amended since its creation resulting in key information not being included in the form. The workgroup suggested a number of improvements that are described below.
- The current process does not make clear that a Single Line Diagram should be included with the transmission of the CSSIF resulting in challenges for the HHDC to ensure that all relevant circuits have been correctly accounted for and allocated within the Complex Site Rule.
- The current process does not make clear that a change in Feeder Status should result in an updated CSSIF resulting in incorrect application of the Complex Site Rule where notification of changes to the Feeder Status of circuits within the Complex Site are not communicated.

All of the above can lead to the CSSIF being interpreted differently by different parties. As such, the Complex Site rule is sometimes applied incorrectly or is not updated when there is change of status of the Metering Equipment associated with the Complex Site. This leads to incorrect data being submitted to Settlement. Metering Systems comprised within a Complex Site are often submitting large quantities of energy into Settlement. Lack of clarity in the Complex Site process increases the chance of errors associated with these MSIDs, which has resulted in large scale Trading Disputes.

Background

Complex sites are defined as sites at which the Metering Technical Details (which provide the HHDC with the information needed to collect data from the Meters and allocate it to Metering Systems for purposes of Settlement) are too complex to be captured in the standard D0268 'Half Hourly Metering Technical Details' data flow. [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)² and REC Schedule 14 'Metering Operations' include provisions for 'Complex Sites', providing guidance and clarification on the appropriate Settlement arrangements for various types of complex site.

In recent years Elexon have received questions (from Energy Suppliers and other interested parties) on the scope of these arrangements. Confusion over the current complex site procedures was also identified as a key factor in the lessons learned session related to a high materiality Trading Dispute. Issue 88 was raised by Elexon to determine what changes could be made to the BSC and its subsidiary documents to improve clarity and consistency for parties in relation to the complex site arrangements. The four main areas that Issue 88 looked into were:

1. Combining multiple boundary points into a single SVA Metering System (i.e. totalisation) may not be consistent with the BSC;
2. It is unclear in which complex site arrangements netting can occur;
3. The concept of 'site' is not clearly defined; and
4. General process inefficiencies.

This CP will address the Issue 88 Workgroup's recommendation in relation to point 4 above, the conclusions in relation to points 1-3 are as below:

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“Combining multiple boundary points in a single SVA Metering System (i.e. totalisation) may not be consistent with the BSC”

The majority of the complex site arrangements in BSCP502 include various forms of ‘totalisation’, in which Imports (or Exports) measured at multiple Boundary Points are aggregated and allocated to a single SVA Metering System. It was intended (in 2003, when provisions for complex sites were first included in the BSC Procedures) that totalisation should be permitted. However, there was some confusion around whether [Section K ‘Classification and Registration of Metering Systems and BM Units’⁴](#) made this sufficiently clear.

The Issue Group agreed that the BSC should be amended to make clear that totalisation should be permitted. If possible, it is recommended that these clarifications be progressed alongside the Modification related to Complex Site Classes, as described below.

“It is unclear in which complex site arrangements netting can occur” and “The concept of ‘site’ is not clearly defined”

The Issue 88 Workgroup considered the apparent lack of clarity as to whether netting Export and Import values across the Total System should be allowed. This was in relation to specific arrangements that were considered by the Issue Group. Further details can be found in the [Issue 88 report](#)¹.

There was consensus within the Issue group that a Modification could be raised by an interested Party to introduce the concept of Complex Site Classes. The categorisation of different types of complex site arrangement would provide clear criteria for what constitutes a ‘site’ in the context of a complex site, as well as clarifying the circumstances in which netting is permitted. Details on the initial idea of what could constitute the different Classes of complex site can be found in the Issue 88 report. At the time of writing, no Party has come forward to progress the relevant Modification.

General Process Inefficiencies

Whilst Issue 88 was originally conceived to clarify the requirements for Complex Sites relating to ‘Local Energy Schemes’ (the differencing of Exports from Imports across a Boundary Point) the Performance Assurance Board (PAB) requested that Issue 88 also look at perceived inefficiencies within the Complex Site process itself.

This was due to a number of Trading Disputes that, following investigation, were determined to have a root cause related to failings in the Complex Site Process. The recommendations being progressed in this CP relate to the Issue 88 Workgroup’s recommendations to rectify these inefficiencies, as described at the beginning of this section.

R0018 ‘Complex Site Process Improvements’

Processes relating to Complex Sites impact both MOAs and HHDCs. The aspects of BSCP502 that are proposed to be amended as part of this CP will be progressed under the BSC Change Process. The Complex Site processes as they relate to MOAs are now governed under the REC Schedule 14 ‘Metering Operations’. The complex site process is the same across both documents (as it is a duplication of the process for MOAs and HHDCs); therefore, any changes to BSCP502 will need to be reflected in the REC. As such, this Change Proposal will be progressed in parallel with the equivalent change in the REC ([R0018 ‘Complex Sites Process Improvements’³](#)), as a cross-code Change, with the REC acting as the lead Code.

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⁴ <https://www.elxon.co.uk/the-bsc/bsc-section-k-classification-and-registration-of-metering-systems-and-bm-units/>

3. Solution

Proposed solution

The Issue 88 Workgroup recommended the following improvements to the Complex Site process:

- Mandating the use of the CSSIF;
- Creation of a new standardised CSSIF, the format of which was determined by the workgroup as below:
 - Addition of an Effective from/to date;
 - Addition of all associated Metering System Identifiers (MSIDs) to highlight the relationship between Boundary connected and embedded MSIDs;
 - Removal of duplicate fields between the 'D0268 – Half Hourly Meter Technical Details' market message and the CSSIF;
 - Addition of a Smart Meter indicator;
 - Addition of a 'comments box';
 - Addition of 'method of calculation' where compensation has been applied (i.e. dynamically in the Meter or as a fixed constant in the Complex Site Rule);
 - A field for the user to sign when the CSSIF has been signed;
 - Addition of a version number; and
 - Changed format from Microsoft Word to Microsoft Excel.
- Clarifying that an electrical Single Line Diagram of the site should be included and transferred along with the CSSIF.
- Clarifying that a change in Feeder status requires a new and updated CSSIF to be sent.
- Clarify that as part of the Complex Site Validation Test both the raw metered data and aggregate of the Complex Site Rule should be sent from the HHDC to the Half Hourly Meter Operator (HHMOA) and both sets of this data checked and confirmed before the validation test is considered 'passed'.

This solution is being mirrored in R0018 for the REC Schedule 14 changes.

Proposer's rationale

Raising a Change Proposal to implement the complex site process improvements described above was the agreed solution of the Issue 88 Workgroup and this was noted by the BSC Panel at its meeting on 10 June 2021 ([315/05⁵](https://www.elexon.co.uk/meeting/bsc-panel-315/)).

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Proposed redlining

The amendments to BSCP502 and the newly drafted BSCP502 Appendix A 'Complex Site Supplementary Information Form' can be found in Attachments B and C, respectively.

⁵ <https://www.elexon.co.uk/meeting/bsc-panel-315/>

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

CP1559 (and R0018) is expected to impact HHDCs, SVA MOAs, Suppliers and Distribution System Operators (DSOs). This impact is anticipated to be minimal and will not require any system changes. HHDCs and MOAs are expected to require some minor process changes to ensure that the updated complex sites process is followed correctly. Suppliers and DNOs will only be impacted in that they will receive more accurate information in relation to complex sites.

BSC Party & Party Agent Impacts

BSC Party/Party Agent	Impact
HHDC	Minor process changes to ensure updated complex sites process is followed correctly
MOA	
Supplier	No process changes expected, Suppliers and DNOs will receive more accurate information in relation to complex sites.
DSO	

Participant costs

No tangible costs were identified by HHDCs or MOAs in the R0018 impact assessment.

Central impacts and costs

Central impacts

This is a document-only change, with no system impacts expected.

Central Impacts

Document Impacts	System Impacts
<ul style="list-style-type: none">• BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'²• New BSCP502 Appendix A 'Complex Site Supplementary Information Form'	<ul style="list-style-type: none">• N/A

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Central costs

The central implementation costs for CP1559 will be approximately <£2k to give effect to the document changes.

5. Implementation Approach

Recommended Implementation Date

Elxon recommends an implementation date of 3 November 2022 as part of the November 2022 standard BSC Release. This is the earliest date that the benefits of this CP can be realised, and aligns with the implementation date of R0018.

6. Initial Committee Views

SVG's initial views

CP1559 was presented to the SVG at its meeting on 1 March 2022 ([253/09⁶](#)). Members noted the proposed progression of the CP and made no further comments.

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⁶ <https://www.elxon.co.uk/meeting/svg253/>

7. Industry Views

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

Summary of CP1559 CP Consultation Responses

Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1559 proposed solution?	5	0	0	0
Do you agree that the draft redlining delivers the intent of CP1559?	5	0	0	0
Do you agree with the proposed implementation approach for CP1559?	5	0	0	0
Do you have any further comments on CP1559?	4	1	0	0

Summary of CP1559 CP Consultation Responses

Question	High	Medium	Low	None
Will CP1559 impact your organisation?	0	0	5	0
Will your organisation incur any costs in implementing CP1559?	0	0	5	0

CP1559 was circulated for consultation between 7 March 2022 and 1 April 2022 as part of the March 2022 CPC batch. Five responses were received to the consultation from respondents representing Suppliers and Supplier Agents. All responses supported the approval of CP1559 and its proposed implementation date of 3 November 2022, as part of the November 2022 BSC Release.

Impacts

All respondents noted that they expected a low impact from the implementation of CP1559, but that these were minor/one-off costs associated with the required process changes.

One respondent noted a concern around obtaining and creating Single Line Diagrams (SLDs) for existing complex sites that may be subject to change, as there may be issues with obtaining historic SLDs as it has not been a definitive requirement to create them. However, they highlighted that they were supportive of the change and were seeking only to highlight that additional work associated with generating these SLDs would be required in future.

Inclusion of data in auxiliary dataflows

Two respondents stated that, whilst they were supportive of the approval and implementation of CP1559, as the industry moves forward it would be beneficial to move some or all of the information contained within the CSSIF to auxiliary data flows. They explained that this would ensure that all of the information parties require to service, read

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and disseminate metered data correctly into Settlement is received in a timely and accurate fashion with the data exchange methods aligned. This would also reduce the chance of human error in the process.

Elexon agreed with this view, and also that it should be considered as part of a future change as more complex sites are likely to emerge to facilitate the move to net zero.

Elexon has taken this into consideration and notes that it could be progressed in the future if a Party proposed the change, but that it is outside the scope of CP1559.

GDPR impacts

One respondent highlighted a concern that the use of the CSSIF for domestic sites would be in breach of the General Data Protection Regulation (GDPR). They explained their view that the requirement to send the CSSIF, and potentially personal data, between parties via email risks a breach of GDPR as email is not considered a secure data transmission mechanism. While Elexon generally treats domestic MPAN/MSID data it holds as personal data, there is no other information in the CSSIF that, in combination with the MPAN/MSID, would enable an individual to be identified. Provided this remains the case we consider sending the information in the CSSIF by email to be consistent with GDPR requirements.

Comments on the proposed redlining

Comments on the CP1559 Proposed Redlining		
Document & Location	Comment	Elexon's Response
BSCP502 – Footnote 3	I believe this is now an incorrect reference and think it is the first footnote in the BSCP.	Footnote references will be updated as part of implementation.

8. Recommendations

We invite the SVG to:

- **APPROVE** the proposed changes to BSCP502 for CP1559;
- **APPROVE** the creation of the new BSCP502 Appendix A 'Complex Site Supplementary Information Form'; and
- **APPROVE** CP1559 for implementation on 3 November 2022 as part of the standard November 2022 Release.