

## CP Progression Paper

# CP1579 - Allowing HHDCs to undergo Protocol Approval before completing Qualification

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### About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary](#).<sup>1</sup>

This document provides information on a new Change Proposal (CP) and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to the SVG on 02 May 2023 and the ISG on 02 May 2023 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP proposal form.
- Attachment B contain(s) the proposed redlined changes to deliver the CP solution.



#### Committee

Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG)



#### Contact

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<sup>1</sup> <https://bscdocs.elexon.co.uk/bsc/bsc-section-x-1-general-glossary>

## 1. Summary



### Not sure where to start?

We suggest reading the following sections:

- Have 5 minutes?  
Read section 1
- Have 15 minutes?  
Read sections 1, 4, 5 and 6
- Have 30 minutes?  
Read all sections
- Have longer?  
Read all sections and the annexes and attachments

### Why change?

The [BSCP601 'Metering Protocol Approval and Compliance Testing'](#)<sup>2</sup> requires Asset Metering Virtual Lead Parties (AMVLPs), Half Hourly Data Collectors (HHDCs), Asset Metering Half Hourly Data Collectors (AMHHDCs) and other Asset Metering Equipment users to be Qualified before applying for Compliance Testing and Protocol Approval.

This results in a time gap between when the HHDCs and AMHHDCs are able to operate in the market and completing Protocol Approval.

This could also result in a risk that HHDCs accept appointments before completing Protocol Approval leading to them operating using a Protocol that they have not yet received Protocol Approval for.

### Solution

Allow HHDCs and AMHHDCs to apply for Protocol Approval at the start of, or during, the Qualification process.

### Impacts and costs

This CP will positively impact HHDCs and AMHHDCs.

This CP will require changes to the BSCP601. The central implementation cost will be less than £1k to implement the relevant document changes. No BSC central systems changes are anticipated.

### Implementation

This CP is proposed for implementation on 2 November 2023 as part of the November 2023 Standard BSC Release.

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<sup>2</sup> <https://bscdocs.elexon.co.uk/bsc-procedures/bscp601-metering-protocol-approval-and-compliance-testing-bscp-601>

## 2. Why Change?



### What is Protocol Approval?

Protocol Approval is the process by which the Protocol implemented in a Qualified HHDC's data collection system is tested against a known version of the Protocol (e.g. the Meter, Asset Meter or Outstation manufacturer's software) to confirm it has been correctly implemented in order to collect metered data for Settlement purposes.

### What is the issue?

The [Half Hourly Codes of Practice \(CoPs\)](#)<sup>3</sup>, 1, 2, 3, 5, 10 and 11, require Outstation data to be to a format and protocol approved by the Panel in accordance with [BSCP601 'Metering Protocol Approval and Compliance Testing'](#)<sup>4</sup>. BSCP601 defines the processes for Meter Manufacturers, Meter Operator Agents (MOAs), Suppliers, AMVLPs, HHDCs, AMHHDCs and other Half Hourly Metering Equipment or Asset Metering Equipment users to apply for Compliance Testing and Protocol Approval.

HHDCs cannot start the Protocol Approval process until they have completed BSCP601 Qualification, this is because BSCP601 states 'Qualified' as a prerequisite. This results in a delay for the HHDC to be able to operate in the market, given that after Qualification, they then have to complete Protocol Approval for all Outstation Types that they wish to support. In the extreme, this can take another six months on top of the qualification period.

As Protocol Approval is not part of the Qualification, it also results in a risk that HHDCs accept appointments (due to commercial arrangements) before completing Protocol Approval leading to them operating using a Protocol that they have not yet received Protocol Approval for.

### Background

BSCP601 covers the application process, submission of Metering Equipment and Asset Metering Equipment, communications with the Compliance and Protocol Testing Agents, the issue and removal of certificates.

This process is defined to ensure that Metering Equipment and Asset Metering Equipment is designed and manufactured to the requirements of the relevant Code/s of Practice. Each Compliance Approval is specific to that Metering Equipment or Asset Metering Equipment tested including type reference and any firmware and software versions.

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<sup>3</sup> <https://bscdocs.elexon.co.uk/codes-of-practice>

<sup>4</sup> <https://bscdocs.elexon.co.uk/bsc-procedures/bscp601-metering-protocol-approval-and-compliance-testing-bscp-601>

### 3. Solution

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#### Proposed solution

Although BSCP601 refers to Qualified HHDCs and Qualified AMHHDCs, this CP will allow HHDCs and AMHHDCs to apply for Protocol Approval at the start of, or during the Qualification process. Certificates of Protocol Approval will only be granted following successful Protocol testing and Qualification.

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#### Proposer's rationale

By allowing HHDCs and AMHHDCs to be immediately active in the market following qualification, we would prevent a time lapse between qualification and the first Protocol Approval. Apart from being more efficient, this would mitigate the risk that HHDCs accept appointments for Meters they have not achieved Protocol Approval yet, following qualification.

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#### Proposed redlining

The CP proposes to update BSCP601. The redlining to support this change can be found in Attachment B.

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## 4. Impacts and Costs

### BSC Party & Party Agent impacts and costs

This CP is expected to have a positive impact on HHDCs and AMHHDCs.

#### BSC Party & Party Agent Impacts

| BSC Party/Party Agent | Impact   |
|-----------------------|--|
| HHDCs and AMHHDCs     | To allow them to apply for Protocol Approval at the start of, or during the Qualification process. |

### Central impacts and costs

#### Central impacts

The solution in this CP only affects BSC documentation, specifically BSCP601. No BSC Central Systems or Agents will be impacted.

#### Central Impacts

| Document Impacts  | System Impacts                                       |
|---|--|
| <ul style="list-style-type: none"><li>BSCP601 'Metering Protocol Approval and Compliance Testing'</li></ul> | <ul style="list-style-type: none"><li>None</li></ul> |

#### Impact on BSC Settlement Risks

#### Impact on BSC Settlement Risks

None

#### Central costs

The central implementation costs for this CP will be less than £1k.

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## 5. Implementation Approach

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### Recommended Implementation Date

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This CP is recommended for implementation on 2 November 2023 as part of the standard November 2023 BSC Release.

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## 6. Proposed Progression

### Progression timetable

The table below outlines the proposed progression plan for this CP:

| Progression Timetable                                 |   |
|---|---|
| Event   | Date  |
| CP Progression Paper presented to ISG for information | 02 May 2023                                       |
| CP Progression Paper presented to SVG for information | 02 May 2023                                       |
| CP Consultation                                       | 09 May 2023 – 06 June 2023                        |
| CP Assessment Report presented to ISG for decision    | 04 July 2023                                      |
| CP Assessment Report presented to SVG for decision    | 04 July 2023                                      |
| Proposed Implementation Date                          | 02 November 2023 (Standard November 2023 Release) |

### CP Consultation questions

We intend to ask the standard CP Consultation questions for this CP. We do not believe any additional questions need to be asked for this CP.

| Standard CP Consultation Questions                                    |
|---|
| Do you agree with the proposed solution?                              |
| Do you agree that the draft redlining delivers the proposed solution? |
| Will this CP impact your organisation?                                |
| Will your organisation incur any costs in implementing this CP?       |
| Do you agree with the proposed implementation approach for this CP?   |

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## 7. Recommendations

We invite you to:

- **NOTE** the proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.
- **NOTE** that this CP will be presented to:
  - the ISG on 02 May 2023; and
  - the SVG on 02May 2023.