

CP Assessment Report

CP1582 'Remove MA from BSCP520 3.6.2.3'



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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](#)¹.

This document is the Change Proposal (CP) Assessment Report for CP1582 which Elexon will present to the SVG at its meeting on 3 October 2023. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1582.

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 originally proposed redlined changes to deliver the CP1582 solution.
- Attachment C contains the updated redlining for re-consultation to deliver the proposed new CP1582 solution.
- Attachment D contains the full responses received to the CP Consultation.

Committee

Supplier Volume
Allocation Group (SVG)

Recommendation

Re-Consult as part of the
October Change
Proposal Circular (CPC)
batch

Implementation Date

29 February 2024
(February 2024 Release)



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

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?

[BSCP520 'Unmetered Supplies Registered in SMRS'](#)² step 3.6.2.3, as introduced erroneously by [P434 'Half Hourly Settlement for UMS Metering Systems'](#)³, states "UMSO confirms the de-energisation date to Supplier, NHHDC and MA".

However Non Half Hourly (NHH) Unmetered Supply (UMS) sites don't have a Meter Administrator (MA).

Solution

The MA should be removed from BSCP520 3.6.2.3.

Impacts and costs

This is a housekeeping update to correct BSCP520. We therefore do not anticipate that this CP will impact any BSC Party or Party Agent.

On 12 July 2023 Elexon received a formal objection from a Meter Administrator (MA) to CP1582 being raised as a Housekeeping CP, as a result we are issuing for consultation as per [BSCP40 3.5.11](#)⁴ to understand industry views on the solution, impacts and costs.

Implementation

CP1582 was recommended for implementation on 2 November 2023. Following the objection to the CP and subsequent consultation responses we are recommending re-consultation with a new implementation date of 29 February 2024, subject to SVG agreeing to re-consult with industry and respondents agreeing to this date.

Recommendation

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1582 made following the first CP Consultation;
- **AGREE** CP1582 should be issued for re-consultation with industry;
- **NOTE** the updated proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the second CP Consultation.



Housekeeping Change

Involves the correction of manifest errors, minor errors and inconsistencies, including typographical errors (e.g. punctuation errors, spelling mistakes, incorrect font, incorrect capitalisation) incorrect cross-referencing, and the removal of redundant text. Housekeeping CPs do not require a CP Consultation, however market participants can raise an objection to this approach if they believe there will be an impact.

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² <https://bscdocs.elexon.co.uk/bsc-procedures/bscp520-unmetered-supplies-registered-in-smrs>

³ <https://www.elexon.co.uk/mod-proposal/p434/>

⁴ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp-40-change-management>

2. Why Change?

What is the issue?

BSCP520 step 3.6.2.3, as introduced erroneously by P434, states “UMSO confirms the de-energisation date to Supplier, NHHDC and MA”.

However Non Half Hourly (NHH) Unmetered Supply (UMS) sites don't have a Meter Administrator (MA).

Background

P434

[P434 'Half Hourly Settlement for UMS Metering Systems'](#) was raised by Npower Commercial Gas Limited on 3 February 2022.

P434 required a period of mandatory Change of Measurement Class (CoMC) activity for all Non-Half Hourly (NHH) Unmetered Supplies (UMS) Metering Systems to complete before the Market Wide Half Hourly Settlement (MHHS) migration to the Target Operating Model (Milestone 11 (M11) in the MHHS Timetable). When P434 was raised, this was required to be completed by October 2024. It also required all new UMS connections to be settled Half Hourly (HH) from 12 months prior to M11, which at the time was October 2023.

If the transition for NHH UMS Metering Systems was not brought forward, combined with the workload from other MHHS activities, it was felt there was a significant increase to the risk that there will be insufficient time for Customers, Suppliers and UMSSOs to address any issues that may arise with the transition to the MHHS Target Operating Model.

As introduced by P434, BSCP520 step 3.6.2.3 states “UMSO confirms the de-energisation date to Supplier, NHHDC and MA”, however NHH UMS sites do not have a MA appointed.

P434 was implemented on 14 December 2022 as a special BSC Release.

Objection to CP1582 as Housekeeping CP

On 12 July 2023 Elexon received a formal objection from a MA to CP1582 being raised as a Housekeeping CP.

The MA advised the changes put in by P434 were unclear over the intention for including the MA in section 3.6.2.3. They stated the intent of the wording was to ensure that for the Meter System Identifier (MSID) that is to be retained when a Change of Measurement Class (CoMC) is performed, to make clear that there is an obligation on the UMSSO to still send the D0388 'UMS Inventory' to the MA if an MSID is de-energised at the time of the change, but with a zero Charge Code. This will ensure that the MA calculates zero consumption.

The MA has suggested additional updated changes to BSCP520 clauses 3.1 and 3.6 that would help to clarify the intent of the change and ensure a more robust solution to the issue identified in CP1582. Highlighted changes are as follows:

1. Update section 3.1.13 – to include the requirement that has been suggested for removal through CP1582 (from 3.6.2.3), within this section. Given section 3.6.2.5 already directs participants to follow 3.1.8 through to 3.1.17 – the suggested change to 3.1.13 ensures this is covered when following the CoMC process.

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2. Reword section 3.6.2.3 to include the removal of the text this CP originally suggested, but also to reword for clarification that this section relates to the NHH MSIDs not being retained.
3. Reword section 3.6.2.4 to clarify this section relates to the NHH MSIDs not being retained.
4. Reword section 3.6.2.5 to clarify this section relates to the MSID that is being retained.
5. Reword section 3.6.2.6 to clarify this section relates to the NHH MSIDs not being retained.

As a result of the objection being received, the original CP1582 solution was sent for consultation as part of the August 2023 Change Proposal Circular (CPC) batch (with responses described in Section 7 of this paper).

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3. Solution

Proposed solution

The MA should be removed from BSCP520 step 3.6.2.3.

Proposer's rationale

Housekeeping change to ensure process within BSCP520 is aligned with industry practice. This was recommended as housekeeping as it is correcting an error in a process that is not possible to implement by industry participants due to MA's not being appointed for NHH sites.

Proposed redlining

BSCP520 step 3.6.2.3 updated to remove MA.

Proposed amendments to the redlining for BSCP520 made following the first CP Consultation

Following objection and consultation responses, redlining has been updated to reflect comments received and provide greater clarity to industry:

1. Update section 3.1.13 – to include the requirement that has been suggested for removal through CP1582 (from 3.6.2.3), within this section. Given section 3.6.2.5 already directs participants to follow 3.1.8 through to 3.1.17 – the suggested change to 3.1.13 ensures this is covered when following the CoMC process.
2. Reword section 3.6.2.3 to include the removal of the text this CP originally suggested, but also to reword for clarification that this section relates to the NHH MSIDs not being retained.
3. Reword section 3.6.2.4 to clarify this section relates to the NHH MSIDs not being retained.
4. Reword section 3.6.2.5 to clarify this section relates to the MSID that is being retained.
5. Reword section 3.6.2.6 to clarify this section relates to the NHH MSIDs not being retained.

Updated redlining can be found in Attachment C.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

Elxon did not anticipate that CP1582 will materially impact any BSC Party or Party Agents as we believed this to be a Housekeeping Change. No impacts for Parties or Party Agents were identified during consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
None	No impacts identified.

Participant costs

No costs for participants were identified.

Central impacts and costs

Central impacts

This CP will require a document only Housekeeping update to BSCP520. No BSC Central System changes are required, and there will be no impact on BSC Agents.

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

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
As a Housekeeping change no impacts on BSC Settlement Risks are expected.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS

As a Housekeeping change no impacts on MHHS are expected.

Central costs

The central implementation costs for CP1582 are expected to be under £1K to make the required document changes.

5. Implementation Approach

Recommended Implementation Date

CP1582 was initially proposed to be implemented on 2 November 2023 as part of the standard November 2023 BSC Release to ensure the change is implemented at the earliest opportunity.

Following the objection to the CP and subsequent consultation responses we are recommending re-consultation with a new implementation date of 29 February 2023, subject to SVG agreeing to re-consult and respondents agreeing to this date. This is due to the November 2023 release no longer being a viable option if a 2nd consultation is held, due to the consultation window being open post 2 November 2023. Given no consultation respondents identified any costs or impacts we believe there should be sufficient time to implement the change based on the updated timetable in Section 8, but will seek to clarify this via consultation.

6. Initial Committee Views

SVG's initial views

CP1582 was presented as an Assessment Report as a Housekeeping CP at the SVG meeting on [4 July 2023](#)⁵. The SVG were informed a potential objection may be received as Elexon had received notice prior to the committee meeting, although exact details of the potential objection were unknown at this stage. Elexon confirmed any approval would be subject to a 15 Working Day objection window and would be issued for industry consultation if an objection was received in the next available CPC batch.

Given the proposed governance routes, the SVG:

- **AGREED** that CP1582 is a Housekeeping CP as defined in BSCP40;
- **APPROVED** the proposed changes to BSCP520 for CP1582; and
- **APPROVED** CP1582 for implementation on 2 November 2023 [as part of the standard November 2023 Release].

September SVG

Elexon presented an AOB item at SVG on [5 September 2023](#)⁶, detailing the progress made on CP1582 including the objection and consultation responses received. We informed the SVG our 'minded to' position was to issue for a 2nd consultation period with an updated solution based on consultation responses in order to provide greater clarity for industry. SVG members advised this was a pragmatic solution to the circumstances encountered and supported the proposed approach.

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⁵ <https://www.elexon.co.uk/meeting/svg269/>

⁶ <https://www.elexon.co.uk/meeting/svg271/>

7. Industry Views

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

We received 6 responses to the Consultation, 3 from Distributors, 2 from MA's and 1 from a Supplier.

4 of the respondents were supportive of the CP to be approved as HK, with 2, including the MA who provided the objection, preferring the alternative solution set out in the objection, noting the draft redlining provided as part of P434 was unclear and progressing the CP as HK would remove all elements of the requirement for the MA to be sent required information.

Having reviewed the updated redlining, we do believe this provides greater clarity to BSCP520 than both the existing documentation and the updated HK redlining provided as part of CP1582. Given the proposed updated, we believe this is a material change to the solution and as such no longer represents a HK CP, and therefore is required to be re-issued for consultation in order to give industry an opportunity to respond to the updated solution. Whilst we accept the HK change could be approved in isolation with a further CP raised to provide further clarification, re-consulting provides a pragmatic solution to ensure BSCP520 is updated to accurately reflect existing industry practice at the earliest opportunity.

No respondents identified any costs or impacts as a result of CP1582.

Following the objection to the CP and subsequent consultation responses we are recommending re-consultation with a new implementation date of 29 February 2024 (standard BSC February Release), subject to SVG agreeing to re-consult and respondents agreeing to this date. This is due to the November 2023 release no longer being a viable option if a 2nd consultation is held, due to the consultation window being in effect after the 2 November 2023 date. Given no consultation respondents identified any costs or impacts we believe there should be sufficient time to implement the change based on the updated timetable in Section 8, but will seek to clarify this via consultation.

Summary of CP1582 CP Consultation Responses				
Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1582 proposed solution?	4	2	0	0
Do you agree that the draft redlining delivers the intent of CP1582?	3	2	1	0
Do you agree with the proposed implementation approach for CP1582?	3	1	2	0
Do you have any further comments on CP1582?	1	5	-	-
Question	High	Medium	Low	None
Will CP1582 impact your organisation?	0	0	0	4
Will your organisation incur any costs in implementing CP1582?	0	0	0	4

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Comments on the proposed redlining

As part of the objection received, an MA advised of updated redlining that would provide greater clarity to BSCP520 in place of the proposed HK change. Having reviewed this alongside consultation responses, and following discussion with SVG in September, we are proposing to update the redlining as detailed below in order to provide greater clarity to industry.

Comments on the CP1582 Proposed Redlining		
Document & Location	Comment	Elexon's Response
BSCP520 3.1.13	Updated to include the requirement that has been suggested for removal through this CP (from 3.6.2.3), within this section. Given section 3.6.2.5 already directs participants to follow 3.1.8 through to 3.1.17	Agree this provides greater clarification to BSCP520 and should be incorporated as part of an updated solution.
BSCP520 3.6.2.3	Reworded to include the removal of the text this CP originally suggested, but also to reword for clarification that this section relates to the NHH MSIDs not being retained	Agree this provides greater clarification to BSCP520 and should be incorporated as part of an updated solution.
BSCP520 3.6.2.4	Reworded to clarify this section relates to the NHH MSIDs not being retained	Agree this provides greater clarification to BSCP520 and should be incorporated as part of an updated solution.
BSCP520 3.6.2.5	Reworded to clarify this section relates to the MSID that is being retained.	Agree this provides greater clarification to BSCP520 and should be incorporated as part of an updated solution.
BSCP520 3.6.2.6	Reworded to clarify this section relates to the NHH MSIDs not being retained	Agree this provides greater clarification to BSCP520 and should be incorporated as part of an updated solution.

8. Proposed Progression

Progression timetable

The table below outlines the updated proposed progression plan for this CP if SVG agrees to re-consult.

Progression Timetable	
Event	Date
First CP1582 Assessment Paper presented to SVG	4 July 2023
HK CP Objection Window	5 July 2023 – 26 July 2023
First CP Consultation	7 August 2023 – 4 September 2023
Second CP Assessment Report presented to SVG for decision	3 October 2023
Second CP Consultation	9 October 2023 – 3 November 2023
Third CP Assessment Report presented to SVG for decision	5 December 2023
Proposed Implementation Date	29 February 2024 (February 2024 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?

9. Recommendations

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1582 made following the first CP Consultation;
- **AGREE** CP1582 should be issued for re-consultation with industry;
- **NOTE** the updated proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the second CP Consultation.

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