

CP Consultation

CP1582 'Update BSCP520 on Change of Measurement Class to ensure UMSO send a D0388 with a zero charge code'

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Committee

Supplier Volume
Allocation Group (SVG)



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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.

The purpose of this Change Proposal (CP) Consultation is to invite BSC Parties, Party Agents and other interested parties to provide their views on the impacts and the merits of CP1582. The SVG will then consider the consultation responses before making a decision on whether or not to approve CP1582.

There are 4 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.
- Attachment B contains the proposed redlined changes to deliver the CP1582 solution.
- Attachment C 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.

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2nd CP Consultation

9 October 2023

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¹ <https://www.elxon.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?

CP1582 was originally raised as a housekeeping Change Proposal (CP) to update 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" as Non Half Hourly (NHH) Unmetered Supply (UMS) sites don't have a Meter Administrator (MA).

Following an objection to the CP as housekeeping, and subsequent consultation period, CP1582 has been expanded to provide greater clarity and alignment with industry process for BSCP520 where a Change of Measurement Class (CoMC) event has occurred.

Solution

Update BSCP520 to make clear that there is an obligation on the Unmetered Supplies Operator (UMSO) to still send the D0388 'UMS Inventory' to the MA, but with a zero Charge Code, so that the MA calculates zero consumption when a CoMC event has occurred.



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.

Impacts and costs

This is a document only change for Elexon and therefore will incur costs of <£1k. As part of the previously issued consultation no BSC Parties or Party Agents indicated any impacts or costs, however we will clarify this is still the case through this secondary consultation.

Implementation

CP1582 is recommended for implementation on 29 February 2024 as part of the standard February 2024 BSC release.

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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/>

2. Why Change?

What is the issue?

CP1582 was originally raised a housekeeping CP to update BSCP520 step 3.6.2.3, as introduced erroneously by P434, states “UMSO confirms the de-energisation date to Supplier, NHHDC and MA” as NHH Unmetered Supply UMS sites don’t have a Meter MA.

Following an objection to the CP as housekeeping, and subsequent consultation period, CP1582 has been expanded to provide greater clarity and alignment with industry process for BSCP520 where a CoMC event has occurred.

Note the title of the CP has changed to reflect this is no longer a housekeeping CP and more accurately reflect the new solution.

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 UMSOs 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 UMSO 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.

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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.
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 mandated by the change procedures in [BSCP40 'Change Management'](#)⁴) as part of the August 2023 Change Proposal Circular (CPC) batch.

CP1582 Consultation Responses

Elxon received 6 responses to the original 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 housekeeping, 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 housekeeping would remove all elements of the requirement for the MA to be sent required information.

Having reviewed the updated redlining, Elxon agreed that this provides greater clarity to BSCP520 than both the existing documentation and the updated housekeeping redlining originally provided as part of CP1582. Given the proposed updates, Elxon believed this was now a material change to the solution and as such no longer represents a housekeeping CP, and therefore would be required to be re-issued for consultation in order to give industry an opportunity to respond to the updated solution. Whilst Elxon accepted that the housekeeping change could be approved in isolation with a further CP raised to provide further clarification, it was agreed that re-consulting provides a pragmatic solution to ensure BSCP520 is updated to accurately reflect existing industry practice at the earliest opportunity.

Full consultation responses were as follows:

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

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

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

3. Solution

Proposed solution

Update BSCP520 to make clear that there is an obligation on the Unmetered Supplies Operator (UMSO) to still send the D0388 'UMS Inventory' to the MA, but with a zero Charge Code, so that the MA calculates zero consumption when a CoMC event has occurred.

Proposer's rationale

Elxon have agreed to progress this following the objection to the housekeeping change as we believe the new solution provides greater clarity to industry and better reflects current industry practice.

CP Consultation Question

Do you agree with the CP1582 proposed solution?
Please provide your rationale.

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

Proposed redlining

Updates to BSCP520 as per below:

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.

CP Consultation Question

Do you agree that the draft redlining delivers the CP1582 proposed solution?
If 'No', please provide your rationale.

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

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

In line with the previous consultation responses we do not anticipate that CP1582 will materially impact any BSC Party or Party Agents.

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

Central impacts and costs

Central impacts

This CP will require a document only 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
No impacts on BSC Settlement Risks are expected.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
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.

CP Consultation Question

Will CP1582 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 CP1582 and the CP1582 Implementation Date (including any necessary changes to your systems, 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 CP1582?

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 C

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 re-consulting with a new implementation date of **29 February** 2024 (as part of the standard February 2024 BSC Release), following SVG agreement to re-consult. This is due to the November 2023 release no longer being a viable option due to the consultation window being open post 2 November 2023. Given no previous 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 6, but will seek to clarify this via consultation.

CP Consultation Question

Do you agree with the proposed implementation approach for CP1582?

Please provide your rationale.

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

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 \(269/02\)](#)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.

Noting that an objection would likely be received, 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 update at SVG on [5 September 2023](#)⁶, detailing the progress made on CP1582 including the objection and consultation responses received. Elexon informed the SVG of their 'minded to' position to issue the CP 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.

SVG's Assessment Paper views

Elexon presented the 2nd Assessment report to SVG on [3 October 2023 \(272/02\)](#)⁷ requesting to re-consult on CP1582, detailing the updated redlining and advising of a new timetable below:

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

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

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

⁷ <https://www.elexon.co.uk/meeting/svg272/>

Third CP Assessment Report presented to SVG for decision	5 December 2023
Proposed Implementation Date	29 February 2024 (February 2024 Release)

The SVG:

- **AGREED** the amendments to the proposed redlining for BSCP520 for CP1582 made following the first CP Consultation;
- **AGREED** CP1582 should be issued for re-consultation with industry; and
- **NOTED** the updated proposed progression timetable for the CP.