

## CP Consultation

### CP1582 'Remove MA from BSCP520 3.6.2.3'

#### Contents

1.	Summary	2
2.	Why Change?	3
3.	Solution	5
4.	Impacts and Costs	6
5.	Implementation Approach	8
6.	Initial Committee Views	9



#### Committee

Supplier Volume  
Allocation Group (SVG)



#### Contact

Andrew Grace  
020 7380 4100

[andrew.grace@elexon.co.uk](mailto:andrew.grace@elexon.co.uk)

[BSC.change@-  
elexon.co.uk](https://www.elexon.co.uk/BSC/change@-)

#### About This Document

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

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.



CPXXX1582

CP Consultation

7 August 2023

Version 1.0

Page 1 of 9

© Elexon 2023

<sup>1</sup> <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'](#)<sup>2</sup> step 3.6.2.3, as introduced erroneously by [P434 'Half Hourly Settlement for UMS Metering Systems'](#)<sup>3</sup>, 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](#)<sup>4</sup> to understand industry views on the solution, impacts and costs.

## Implementation

CP1582 is recommended for implementation on 2 November 2023.



## 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.

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

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

<sup>4</sup> <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 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.

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

---

CPXXXX1582

CP Consultation

---

7 August 2023

Version 1.0

---

Page 3 of 9

© Elexon 2023

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 is being sent for consultation as part of the August 2023 Change Proposal Circular (CPC) batch.

## 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.

---

#### 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

---

BSCP520 step 3.6.2.3 updated to remove MA.

---

#### 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

We do not anticipate that CP1582 will materially impact any BSC Party or Party Agents as we believe this to be a Housekeeping Change.

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 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"><li>BSCP520</li></ul>	<ul style="list-style-type: none"><li>None identified</li></ul>

#### 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.

#### 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

We propose that this CP should 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.

CP Consultation Question
Do you agree with the proposed implementation approach for CP1582? <i>Please provide your rationale.</i>
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](#). 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].