

CP Assessment Report

CP1585 'Submission of D0275 or D0036 readings from HH connected Embedded Licensed Distribution System Operator (LDSO) sites to Host LDSO'



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Committee

Supplier Volume
Allocation Group (SVG)

Recommendation

Reject

Implementation Date

29 February 2024
(Standard February
2024 BSC Release)



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 CP1585 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 CP1585.

There are four 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 CP1585 solution.
- Attachment C contains the full responses received to the CP Consultation.

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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?

Host Licenced Distribution System Operators (LDSOs) receive Half Hourly (HH) data for Embedded LDSO sites from the Embedded LDSOs, but this data is often received months later. In contrast, the Host LDSO receives the same data for sites connected to their own network in a timeline manner via market messages. The delay means that data for Embedded LDSO connected sites has to be estimated, which reduces the quality of forecasting.

Solution

This CP proposes that the Half Hourly Data Collector send HH data for Embedded LDSO connected site to the Host LDSO via [D0275 'Validated Half Hourly Advances' \(MM00206\)](#)² and [D0036 'Validated Half Hourly Advances for Inclusion in Aggregated Supplier Matrix' \(MM00413\)](#)³. This would not require any update to the market messages themselves.

Impacts and costs

This CP would positively impact Host LDSOs, by allowing them to access data that would improve the quality of forecasting. There would be an impact to Half Hourly Data Collectors (HHDCs), as process changes would be required to allow them to send the data to the Host LDSOs. There are no central system impacts. The central implementation costs will be less than £1K to implement the changes to two BSC Procedure (BSCP) documents.

Implementation

This CP is recommended for implementation on 29 February 2024 as part of the standard February 2024 BSC Release. This is to ensure the benefits are realised at the earliest opportunity, while allowing time for HHDCs to implement the necessary process changes.

Recommendation

We invite the SVG to:

- **REJECT** the proposed changes to BSCP502 and BSCP550 for CP1585;
- **REJECT** CP1585.

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² <https://digital-navigator.azurewebsites.net/dataspec/3.2.0/marketmessage/MM00206>

³ <https://digital-navigator.azurewebsites.net/dataspec/3.2.0/marketmessage/MM00413>

2. Why Change?

What is the issue?

For LDSOs, many analytical, monitoring and forecasting processes feed into tariff setting and require daily data. Host LDSOs do not receive HH data for Embedded LDSO sites via market messages. Instead, the Embedded LDSO aggregates the monthly data by Meter Point Administration Number (MPAN) and provides a summary to the Host LDSO. The aggregated data is then used by the Host LDSOs for forecasting and billing. There is a significant delay because of this manual step, meaning that, for example, data for October may not be available to Host LDSOs until December. Due to the delay in Host LDSOs receiving this data, and its granularity, Embedded LDSO HH data must be unnecessarily profiled and estimated. Forecast quality would be improved if HH data for Embedded LDSO sites could be provided via market message to the Host LDSO as well as to the Embedded LDSO.

Background

HH data is available for LDSOs for sites connected directly to their network through the D0275 and D0036 data flows. These data flows each contain HH consumption values for use in Supplier and Distributor billing. For Embedded LDSO connected sites, these data flows are sent by the HHDC to the Embedded LDSO only.

This problem is not experienced by Host LDSOs for Non Half Hourly (NHH) data. NHH data is available to Host LDSOs for sites connected directly to the LDSO network through the [D0030 'Aggregated DUoS Report' \(MM00411\)](#)⁴ and for Embedded LDSO connected sites through the [D0314 'Non Half Hourly Embedded Network DUoS Report' \(MM00264\)](#)⁵.

Embedded LDSOs

LDSOs are the companies that are licensed to maintain and manage the electricity distribution networks in Great Britain. They carry electricity between the transmission network (operated by National Grid) and the end users. The connection between the Transmission and Distribution Systems is known as a Grid Supply Point (GSP). There are 14 GSP Groups in Great Britain relating to geographical areas, each operated by an LDSO.

Embedded LDSOs operate distribution networks that do not connect directly to the Transmission and Distribution Systems, and instead connect to a Host LDSOs network. They are not restricted to specific geographical areas. Embedded LDSOs could be Independent Distribution Network Operators (IDNOs) or an LDSO operating outside of its geographical area. There are currently 14 IDNOs.

⁴ <https://digital-navigator.azurewebsites.net/dataspec/3.2.0/marketmessage/MM00411>

⁵ <https://digital-navigator.azurewebsites.net/dataspec/3.2.0/marketmessage/MM00264>

3. Solution

Proposed solution

The proposed solution is for the HHDC to send D0275 and/or D0036 HH readings for Embedded LDSO sites to both the Embedded LDSO and the Host LDSO. HHDCs will be able to identify which Host LDSO the data for Embedded LDSO connected sites should be sent to using the Grid Supply Point (GSP) Group, as each GSP Group has one Host LDSO.

This CP would require amending the schedules within [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)⁶ and [BSCP550 'Shared SVA Meter Arrangement'](#)⁷ to reflect the additional requirement for HH readings for Embedded LDSO sites to be sent to both the Embedded LDSO and the Host LDSO. Amending the D0275 and D0036 market messages within the Energy Market Architecture Repository (EMAR) would not be necessary, as both already have LDSOs listed as a recipient, and EMAR does not differentiate between Host and Embedded LDSOs. A change would not be required to provide the HHDCs with the GSP Group, as the [D0155 'Notification of Meter Operator or Data Collector Appointment and Terms' \(MM00065\)](#)⁸ includes the GSP Group ID (J0066) as a mandatory item, which is sent from the Supplier to the HHDC.

The D0036 is used by LDSO systems for billing purposes. However, this CP will not require any billing system changes by LDSOs as, even without making any updates, the Embedded LDSO market messages will not result in double billing. This is because any D0036 MPANs for Embedded LDSOs would be marked as invalid, due to the MPAN not existing as an HH MPAN in the system. In future, it is possible that the Embedded LDSO D0036 MPANs could be used for billing, but this would require additional changes to LDSO billing systems first.

Looking forward, the D0275 and D0036 are due to be discontinued as part of Market-wide Half Hourly Settlement (MHHS). LDSOs will obtain the HH data through the Data Integration Platform (DIP) via IF-021 'UTC Settlement Period Consumption Data'. No change would be required to the DIP interface to allow this flow to be sent to both the Embedded and Host LDSO, as LDSOs will already be a recipient.

Proposer's rationale

The Proposer, a Host LDSO, has found that receiving delayed aggregated HH data from Embedded LDSO connected sites has caused issues with their processes, such as monitoring and forecasting. They believe that sending D0275 and/or D0036 for Embedded LDSOs to the associated Host LDSO will improve the monitoring, forecasting, and tariff setting quality achievable by Host LDSOs.

The Proposer has spoken with Embedded LDSOs who were happy for this information to be sent to Host LDSOs directly from HHDCs, but found that HHDCs were reluctant to share the information without a formal change to allow it.

Proposed redlining

This CP proposes updates to BSCP502 and BSCP550. The proposed redlined changes can be found in Attachment B.

⁶ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs>

⁷ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp550-shared-sva-meter-arrangement>

⁸ <https://digital-navigator.azurewebsites.net/dataspec/3.3.0/marketmessage/MM00065>

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

The proposer expected CP1585 to have a positive impact on Host LDSOs, as promptly receiving data relating to Embedded LDSO sites will improve forecast quality. They did not anticipate significant system changes for Host LDSOs. However, the consultation responses indicated that some Host LDSOs would require system and process changes in order to store, route and analyse the new data.

Embedded LDSOs will still be required to aggregate the data to share with Host LDSOs for billing purposes, so will not be impacted by CP1585 as long as the additional data is not used for billing of Embedded LDSOs.

HHDCs will be impacted, as CP1585 will result in a change to their processes so that HH data for Embedded LDSOs can also be sent to the associated Host LDSOs.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Host LDSO	Process and system changes to receive, store and process HH data for Embedded LDSO connected sites.
HHDC	Process change to send Embedded LDSO connected site data to Host LDSO.

Participant costs

Participant costs were evaluated as part of the industry consultation. No cost estimates were provided during the consultation, but the process and system changes for Host LDSOs and HHDCs are predicted to be Low to Medium.

Central impacts and costs

Central impacts

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

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'BSCP550 'Shared SVA Meter Arrangement'	<ul style="list-style-type: none">None

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Impact on BSC Settlement Risks

Impact on BSC Settlement Risks

Elxon anticipate no impact on Settlement Risks associated with this change.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS

No impacts to the MHHS solution or drafting are anticipated as a result of this CP. No change will be required to the IF-021 DIP interface, which will replace D0275/D0036.

Central costs

The central implementation costs for this CP will be less than £1k to implement the relevant document changes.

5. Implementation Approach

Recommended Implementation Date

This CP is recommended for implementation on 29 February 2024 as part of the standard February 2024 BSC Release. This is to ensure the benefits are realised at the earliest opportunity, while allowing time for HHDCs to implement the necessary process changes.

6. Initial Committee Views

SVG's initial views

The CP1585 Progression Paper was presented to the SVG for information on 1 August 2023 ([SVG270/03](https://www.elexon.co.uk/meeting/svg270/)⁹). An SVG Member raised a concern over the timelines for HHDC system changes, as using GSP Group would be very different from the way MPID selection is currently undertaken. Elexon explained that they would expect to gain more insight into the anticipated HHDC impact during the consultation, but that they had received no comments from HHDCs in previous industry engagement.

The SVG made no further comment and did not provide any additional questions to ask as part of the consultation.

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⁹ <https://www.elexon.co.uk/meeting/svg270/>

7. Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C. Ten responses were received to the consultation, five from Distributors, four from Supplier Agents, and one from a party undertaking both the Distributor and Supplier Agent roles. There were mixed views about CP1585.

Summary of CP1585 CP Consultation Responses				
Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1585 proposed solution?	4	5	1	0
Do you agree that the draft redlining delivers the intent of CP1585?	10	0	0	0
Will CP1585 impact your organisation?	9	1	0	0
Will your organisation incur any costs in implementing CP1585?	7	3	0	0
Do you agree with the proposed implementation approach for CP1585?	3	7	0	0
Do you have any further comments on CP1585?	4	6	0	0

Several respondents indicated that they did not believe the issue being addressed by CP1585 needs to be rectified. Both Embedded and Host LDSOs claimed that they have not experienced significant delays in the sharing of HH data from Embedded LDSOs to Host LDSOs. The consultation also highlighted that the impacts to Host LDSOs and HHDCs will be more significant than initially expected.

Concerns were also raised around the timing of the change in relation to MHHS. As one respondent noted “implementing a change to existing architecture at this stage, especially to a Supplier Agent function that will not exist in a post MHHS world appears to be a cost that could be avoided”.

Considering the points raised in the consultation it appears that the costs and impacts of CP1585 do not outweigh the benefits at this time. It would be more appropriate to revisit automation of data sharing between Embedded and Hosts LDSOs post MHHS implementation instead.

8. Recommendations

We invite the SVG to:

- **REJECT** the proposed changes to BSCP502 and BSCP550 for CP1585; and
- **REJECT** CP1585.