ELEXON

CP Consultation

CP1589 ‘Change the number of characters used to specify Market Participant Role Codes in the Market Domain Data’

Contents

1.	Summary	2
2.	Why Change?	4
3.	Solution	6
4.	Impacts and Costs	8
5.	Implementation Approach	10
6.	Consultation Extension	11
7.	Initial Committee Views	12

Committee

Supplier Volume Allocation Group (SVG)

Contact

Ayo Bammeke

020 7380 4176

ayo.bammeke@elexon.co.uk

BSC.change@-elexon.co.uk

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 CP1589. The SVG will then consider the consultation responses before making a decision on whether or not to approve CP1589.

We re-issued this CP Consultation on 30 November as version 2.0, to include new information about the use of lowercase letters and consequently included three new consultation questions.

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.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1589 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.

[1] https://www.elexon.co.uk/glossary/?show=all

© Elexon 2023

1. Summary

Why change?

'Market Participant Role Code' is a single character alphanumeric value which is used as a unique identifier for certain Market Roles. There are 36 possible Role Codes to be allocated to different Market Participant Roles, which are defined in the Market Domain Data (MDD).

Currently, all the alphanumeric Role Codes have been allocated and are either in use or have been reserved by the Market Wide Half Hourly Settlement (MHHS) Programme for use from the beginning of the MHHS Transition Period.

Although some Role Codes will become available after the end of the MHHS Transition Period, which is scheduled for late 2026, it is highly likely that there will be a need for new Role Codes to be allocated before then.

In order for new Market Roles to be created in the future, a change to the format of the 'Market Participant Role Code' Data Item is required to increase the number of available Role Codes. Moving to a two-character alphanumeric value would provide many new Market Participant Role Codes.

Solution

Amend the format of the 'Market Participant Role Code' from 'Char(1)' to 'Char(2) to make a significant number of new Role Codes available.

Impacts and costs

The following BSC Configurable Items specify or refer to the format of the 'Market Participant Role Code' Data Item, so must be amended:

- BSCP509 Appendix 01: MDD Entity Change Request Forms[2];
- BSCP509 Appendix 2: MDD Change Request Entity Validation[3]; and
- SVA Data Catalogue Volume 2[4];

The Market Domain Data Management (MDDM) system would need to be amended to enable it to include 2-character Market Participant Role Codes. This will cost approximately £65k to £70k and take 13 weeks.

The Supplier Volume Allocation Agent (SVAA) software will not be impacted, as it would not need to process any 2-character Market Participant Role Codes[2]. The Legacy SVAA application has less Market Participant Role Code content in the application when compared with MDD application and hence only necessary Roles are required in SVAA. Legacy SVAA does not need to be changed to reflect change in Market Participant Role Code length and will continue to work with the current one-character Market Participant Role Code.

This change will require an update to the REC's EMAR Data Specification to amend the logical format and the physical format of the 'Market Participant Role Code Data Item' (J0001) from 'Char(1)' to 'Char(2)'.

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, 6 and 7
- Have 30 minutes? Read all sections
- Have longer? Read all sections and the annexes and attachments

[2] https://bscdocs.elexon.co.uk/bsc-procedures/bscp509-appendix-01-mdd-entity-change-request-forms
[3] https://bscdocs.elexon.co.uk/bsc-procedures/bscp509-appendix-02-mdd-change-request-entity-validation
[4] https://bscdocs.elexon.co.uk/business-definition-documents/sva-data-catalogue-volume-2

© Elexon 2023

Recipients of Market Messages that include the J0001 will be required to amend their systems to allow them to continue to receive and process the flows with the new Char(2) format for Market Participant Role Code.

As the Market Participant Role code is used in the Headers of all Market Messages sent across the DTN, DTN users will be impacted

However Electralink as the DTN service provider has informed BSCCo that only those Data Transfer Network (DTN) users that have adopted the “Fixed File” format for their DTN Gateway will be required to amend their systems to be able to process the new Char(2) format for this CP.

BSCCo has already contacted those Market participants which currently use the Fixed File format to raise their awareness of this proposed change, and will continue to do so during the lifecycle of this change.

BSCCo will seek to confirm the full impact of this change via the CP1589 consultation process.

Implementation

CP1589 is proposed for implementation on 7 November 2024, the implementation date for the November 2024 Release of BSC Systems.

November 2024 will give participants over 6 months from the SVG decision to implement the change, if approved. However, we will establish the appropriate lead time, which could be more than six months, through the industry consultation on this change, and the proposed implementation date could change as a result.

Governance of Cross-Code Impact

As the proposed solution to CP1589 impacts the Electricity Market Architecture Repository (EMAR) Data Specification (DS), which is a Retail Energy Code (REC) product, CP1589 should be considered to have “Cross-Code” impact.

However, the REC’s approach to the governance of such Cross-Code changes is that each Data Item and Market Message (Data Flow) included in the EMAR DS has a Code-owner (e.g. REC, BSCCo, DCUSA (Distribution Connection and Use of System Agreement)).

As the J0001 is specified as a “BSC-owned” Data Item in the EMAR DS, and there are no structural charges to any of the Market Messages that include the J0001, the proposed change only requires approval through BSC governance; no formal REC Change Proposal is required.

Note that REC CP R0132 was raised in relation to this change but was subsequently withdrawn.

© Elexon 2023

2. Why Change?

What is the issue?

'Market Participant Role Code' is a single character alphanumeric value which is used as a unique identifier for certain Market Roles. This provides 36 possible Role Codes to be used by different Market Participant Roles.

Currently, all of the alphanumeric Role Codes have been allocated and are either in use or have been reserved by the Market Wide Half Hourly Settlement (MHHS) Programme for use from the beginning of the MHHS Transition Period.

Although some of the existing Role Codes will become available after the end of the MHHS Transition Period, which is scheduled for late 2026, it is highly likely that there will be a need for new Role Codes to be allocated before then.

BSCCo has discussed with Electralink, who provide the DTN service, whether using upper and lower case alphabetical characters could be used for different role codes and whether any of the 'special characters' in the DTN handbook could be used to provide new Role Codes in addition to the 36 alphanumeric values currently available, in order to remove or delay the need for this change.

BSCCo has investigated whether it would be possible to generate new Market Participant Role Codes without changing the Format of the J0001 – the two possible approaches identified were:

1. Using lower-case and upper-case versions of the same letter (e.g. 'a' and 'A') to represent different Market Participant Roles; and

2. Using 'special characters (e.g. '&', '*', '$') for Market Participant Role Codes.

Regarding 1 - Electralink has confirmed to BSCCo that DTN file headers can accept a mixture of upper or lower case characters to differentiate between market participant role codes, so long as they are specified in the Market Domain Data (MDD). In version one of this consultation we reported, based on information provided from Electralink, that the DTN file headers would only accept upper case characters for Market Participant Role Codes in file headers. Following further discussion with Electralink, this is not the case, so long as the lower case characters are specified in MDD. Despite this new information, we still believe moving to a two-character alphanumeric value would be a more robust solution. This due to the fact that most legacy system potentially may not be able to cope with differentiating between upper and lower case letters. Char (2) provides a cleaner approach, and opens up more options for additional market entrants.

Regarding 2 - Electralink has confirmed to BSCCo that that only one of the 'special character' set, the hyphen ("-"), would be allowed for all uses of the Market Participant Role Code. However, this would only make one new Role Code available, which would not be sufficient to mitigate the risk around the lack of available role codes.

Consequently, a change to the format of the 'Market Participant Role Code' Data Item is required to increase the number of available Role Codes. Moving to a two-character alphanumeric value would provide hundreds of new potential Market Participant Role Codes; just using the numeric values that would become available (10-99) would be sufficient to meet all foreseeable need for new Role Codes. Additionally, the REC Manager (RTS) stated that there would be more effort required in testing, validation, training and ongoing assurance in using upper and lower case values, rather than using distinct 1 or 2 character codes.

© Elexon 2023

Background

The ‘Market Participant Role Code’ is a single character alphanumeric value which is used as a unique identifier for certain Market Roles.

It is defined in MDD Entity 21 “Market Role” [5] and is used:

- in the definition of other MDD Entities;
- in the header of all Market Messages sent across the Data Transfer Network (DTN) to define the sender and the recipient;
- in the main body of six Market Messages sent across the DTN (as the J0001 Data Item):
  - D0269 Market Domain Data Complete Set v002 (BSC-owned);
  - D0269 Market Domain Data Complete Set v004 (BSC-owned);
  - D0270 Market Domain Data Incremental Set v002 (BSC-owned);
  - D0270 Market Domain Data Incremental Set v002 (BSC-owned);
  - D0383 Notification of Commissioning Information (BSC-owned); and
  - D0331 Update Green Deal Market Data (REC-owned).

BSCCo is aware the 36 available alphanumeric Market Participant Role Codes:

- are currently in use; or
- have been reserved by the Market Wide Half Hourly Settlement (MHHS) Programme, for use from the beginning of the Transition Period.

Elexon has investigated the use of all current Role Codes and has identified that the Role Code K ‘Profile Administrator’ could be repurposed, as it hasn’t been used in the last five years and the sole participant no longer performs this function:

However, BSCCo is aware that there is a REC CP (‘R0043’) that, if approved, will require a new Market Participant Role Code in June 2024.

Consequently, it is likely that there would be no Market Participant Role Codes available to BSCCo to allocate to new Market Roles between June 2024 and October 2026 at the earliest. This would be a significant impediment to the implementation of new Electricity Market solutions.

[5] MDD Entity 21 will become Industry Standing Data (ISD) Entity 21 from the beginning of the MHHS Programme Transition Period

© Elexon 2023

3. Solution

Proposed solution

Amend the format of the 'Market Participant Role Code' in MDD from 'Char(1)' to 'Char(2)' in BSC documentation.

Amend the Logical Format and the Physical Format of the Market Participant Role Code Data Item (J0001) from '1' to '2' in the REC's EMAR DS.

Proposer's rationale

This change is necessary to allow BSCCo to allocate new Market Participant Role Codes when required by the industry.

Without this change, no new Market Participant Role Codes could be allocated, which would be a significant impediment to the implementation of new Electricity Market solutions.

CP Consultation Question
Do you agree with the CP1589 proposed solution? *Please provide your rationale.*
We invite you to give your views using the response form in Attachment C.

Potential Drawbacks of the Proposed Solution

In addition to its inclusion in six Market Messages, the Market Participant Role Code is also used twice in the Header of every Market Message sent across the DTN, as the "From Participant" and the "To Participant".

There are three possible configurations for DTN Gateways:

- Fixed File format
- Variable File Format; and
- Poll File Format

Electralink has informed BSCCO that only users of the Fixed File would need to change their systems to accommodate the change to 'Char(2)' for the implementation of CP1589.

BSCCo will seek to confirm our understanding of any other possible issues around the proposed solution from the CP1589 consultation, and will take any comments received into account in the CP1589 change report.

Proposed redlining

Updates have been made to the below BSC Configurable Items and can be found in Attachment B:

- BSCP509 Appendix 1
- BSCP509 Appendix 2

© Elexon 2023

- SVA Data Catalogue Volume 2

In addition, we have specified the required change to the J0001 in the EMAR DS.

CP Consultation Question
Do you agree that the draft redlining delivers the CP1559 proposed solution? *If 'No', please provide your rationale.*
We invite you to give your views using the response form in Attachment C

© Elexon 2023

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
All BSC Parties and SVA Party Agents that use the DTN Fixed File Format	The proposed change will make amend the format of the headers for all Market Messages and therefore Parties and Party Agents will need to consider the impact this has on their system(s).

Central impacts and costs

Central impacts

Amendments will be required to the BSC Configurable Items shown in the table below and to the MDD Management software system to update the Market Participant Role code from Char(1) to Char(2). The lead time for this change is expected to be 13 weeks.

Central Impacts	
Document Impacts	System Impacts
• BSCP509 Appendix 1 • BSCP509 Appendix 2 • SVA Data Catalogue Volume 2	• MDDM

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
No direct material impacts expected on any Settlement Risks, although any changes to market messages can increase risk in general.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
A MHHS Change Request would be required to amend any new or amended systems, including Industry Standing Data, to change any definition of 'Market Participant Role Codes' to Char(2). We are engaging with the MHHS Programme to confirm the sequencing and timing of the MHHS CR with this CP.

Central costs

The central implementation costs for this CP will be approximately £65k to £70k. This includes the costs to amend MDDM and to implement the changes to the Configurable Items.

© Elexon 2023

CP Consultation Question
Will CP1589 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 CP1589 and the CP1589 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 CP1589? *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

© Elexon 2023

5. Implementation Approach

Recommended Implementation Date

CP1589 is recommended for implementation on 7 November 2024, the implementation date for the November 2024 Release of BSC Systems.

November 2024 will give participants over 6 months from SVG decision to implement the change, although we will seek to confirm implementation timescales via consultation. We are consulting on impacts of a later release should this be needed, the preferred implementation is November 2024.

CP Consultation Question
Do you agree with the proposed implementation approach for CP1589? *Please provide your rationale.*
We invite you to give your views using the response form in Attachment C

© Elexon 2023

6. Consultation Extension

CP Consultation Re-issue

Since CP1589 has been sent out of consultation, new information has come to light confirming that lower case and upper case letters can be used within the DTN so long as they are specified in the MDD. As a result, we have re-issued this CP Consultation with three additional consultation questions – see below. We are extending the CP1589 Consultation to **15 December 2023** to give market participants more time to consider these questions. The other CPs in the CP Consultation batch will close as originally scheduled on 8 December 2023. Changes have been made in this document above to Section 2.

Additional Consultation Questions

Additional CP Consultation Question
Would your system be able to process uppercase and lowercase versions of the same letter to represent different Market Participant Role Codes? *If 'No', please provide your comments.*
We invite you to give your views using the response form in Attachment C

Additional CP Consultation Question
Do you prefer the original proposal of Char(2) or the use of upper/lower case letters? *Please provide your comments, giving details of the likely difference in costs, lead times and impacts between Char(2) and the use of upper/lower case letters.*
We invite you to give your views using the response form in Attachment C

Additional CP Consultation Question
Do you think there may be an alternative solution to CP1589? *If 'Yes', please provide your comments.*
We invite you to give your views using the response form in Attachment C

© Elexon 2023

7. Initial Committee Views

SVG's initial views

At their meeting on 7 November 2023 (273/07[6]) The SVG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation.

An SVG member questioned why Electralink have stated now that they're unable to use upper and lower case letters for different role codes, when in the past they've stated that they could. Elexon clarified that the role code is not just being changed in the data item but also in the header of the data flows, in which Electralink have confirmed they expect uppercase characters exclusively.

Following the meeting, Elexon spoke with Electralink again about the use of lowercase letters. Electralink are now stating that lower case letters could be used, so long as they are included in MDD.

Another SVG member wanted to know how many participants use Fixed File Format and if that had any impacts on the header. Elexon told the member that Electralink confirmed there are 4 DTN users of the Fixed File Format.

Elexon also investigated the potential of using special characters as an alternative to go into Char(2). Elexon noted that Electralink tested the hyphen and that would work in the headers. Elexon stated that this could free up one role code but does not mitigate the risk that this CP seeks to avoid as more role codes are needed.

A member questioned why the REC CP (R0132) was withdrawn. Elexon stated that REC Professional Services confirmed the REC CP is not required. This is due to the governance around the change process. Elexon explained that the REC's approach to the governance of such Cross-Code changes is that each Data Item and Market Message (Data Flow) included in the EMAR DS has a Code-owner. As the J0001 is specified as a "BSC-owned" Data Item in the EMAR Data Specification, and there are no structural charges to any of the Market Messages that include the J0001, the proposed change only requires approval through BSC governance; no formal REC Change Proposal is required.

A member of SVG asked if there were any examples to show that a new role code would be needed at all. Elexon referenced that ongoing Modification P442 is looking to introduce a new SVA Party Agent, which would need a new Market Participant Role Code if approved.

A member of SVG raised a concern that the cost of this change could breach the SVG's delegated authority. Elexon confirmed that the limit was £150k. Note that this figure relates to the cost of changes to BSC systems, processes and documentation, but does not include the cost to Market Participants.

A member of SVG asked why the CP would still need to be progressed if in fact MHHS have now got the desired role codes they require. Another member of SVG confirmed that MHHS taking up the last remaining role codes means the full limit will have been reached in June 2024, if REC CP R0043 is approved.

Therefore, any new market participants, including the one related to P442, could run into issues using the DTN as not having its own role code would prevent it from being able to transfer necessary files. Elexon confirmed that this CP forms as risk mitigation for example, in the case of new industry scheme going live, this CP would therefore then have to be

[6] https://www.elexon.co.uk/meeting/svg272/

© Elexon 2023

raised, extensive timescales could occur before then actually being able to allocate the market participant role code.

© Elexon 2023