ELEXON

P419 'Enhanced Reporting of Demand Data to the NETSO to facilitate BSUoS Reform'

v0.6 - 12/11/2021

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Business Requirements Document

Introduction

Overview

The BSC Change Business Requirements document is produced by a Business Analyst or Market Architect as part of the 'End to End BSC Change Process' during the BSC Change Assessment process. It is produced in line with ELEXON's standards for Business Analysis.

The document is split into sections as follows:-

1. BSC Change Summary
    - The introduction provides detail on the objectives, background and scope of the BSC Change described in this document. It also includes any pertinent details on the timing or approach for the production of this deliverable.
2. Business Requirements
    - This section documents the Business Requirements of the BSC Change, as discussed by the workgroup. They are included here in a structured format for consistency and traceability through the implementation phase of the BSC Change.

Purpose

The purpose of this document is to communicate the Business Requirements of BSC Modification Proposal P419 to BSC Parties, Legal colleagues, Party Agents, other market participants and service providers.

In addition, it describes the anticipated impact on BSCCo (people, processes and systems), BSC Agents, the BSC, Code Subsidiary Documents, and other Configurable Items as well as BSC Parties and Party Agents.

BSC Change Summary

P419 Problem Statement

Under the Connection and Use of System Code (CUSC), the Imports to and Exports from the transmission and distribution systems contribute to the calculation of Generation and Demand Transmission Network Use of System (TNUoS) charges and Balancing Services Use of System (BSUoS) charges.

In its Targeted Charging Review Consultation[1], Ofgem challenged industry to resolve a perceived barrier to entry and operation by excluding storage metered volumes from the calculation of residual demand TNUOS charges and BSUOS demand charges.

Two modifications were raised to the CUSC (CMP280[2] and CMP281[3]) which aim to address Ofgem's challenge by excluding certain storage facilities' Imports from the calculation of TNUoS demand residual and BSUoS demand charges[4]. In order that the Imports to these storage facilities may be excluded from the calculation and application of demand TNUoS and BSUoS charges, the NETSO needs to identify eligible sites and related metered volumes.

Following on from the Targeted Charging review, the 2nd BSUoS taskforce recommended that in addition to Electricity Storage Facilities, **Electricity Generation facilities** and **Eligible Service facilities** should also have their import excluded from Final Demand for the purposes of BSUoS charges. These are collectively referred to as **Non-Final Demand** facilities.

CUSC Modification CMP308[5] was raised following the review of BSUoS charges which confirmed that these Non-Final Demand should be exempt from BSUoS charges.

To this end the P383 'Enhanced reporting of demand data to the NETSO to facilitate CUSC modifications CMP280 and CMP281'solution which was raised to identify and exclude the storage facilities import from BSUoS data provided by SVAA to NETSO needs to be expanded, as part of P419, to exclude metered volumes from Generation and Eligible Services import in addition to Storage Facilities (Non-Final Demand Facilities).

In addition, the proposer for P419 requires that the solution provides assurance that the correct metered volumes are collected and reported to the NETSO.

[1] Ofgem, Targeted Charging Review: a consultation, 13 March 2017, 5.9

[2] National Grid, CMP280 'Creation of a New Generator TNUoS Demand Tariff which Removes Liability for TNUoS Demand Residual Charges from Generation and Storage Users'
[3] National Grid, CMP281 'Removal of BSUoS Charges From Energy Taken From the National Grid System by Storage Facilities'
[4] For the purpose of this document, 'storage site operators' are persons who manage operations of plant and apparatus associated with a storage site. The exact definition of storage, storage operator etc. are to be defined in the CUSC.
[5] National Grid CMP308 'Removal of BSUoS charges from Generation'

P419 Objectives and Scope

Objectives

The objective of P419 is to extend the BSC processes and assurance measures for the declaration, collection, aggregation and reporting of SVA Half Hourly (HH) metered data for SVA Non Final Demand Facilities to the NETSO as currently undertaken for SVA Storage Facilities.

Scope

The diagram below summarises the existing process put in place under Modification P383 and highlights changes required by P419 in red.

P419 applies to SVA HH Metering Systems that are identified as measuring Imports to successfully declared SVA Non-Final Demand Facilities.

P419 will not make changes to the calculation of Settlement, irrespective of whether a Supplier BMU comprises Non-Final Demand Facilities. That is, the processes and calculations proposed by P419 will run in parallel to Settlement calculations.

P419 will only cover sites that are Half Hourly (HH) metered – this does not include Unmetered Supplies subject to Equivalent Metering.

The current process to allow a CVA Registrant to declare Generators and / or Storage Facilities takes place between the CVA Registrant and NETSO directly, and will remain outside the BSC. Therefore no changes will be made to the way ELEXON provides CVA Metered Volumes to the NETSO. All the data for larger Non-Final Demand facilities operating in CVA is already sent to the NETSO by the Central Data Collection Agent (CDCA) via the CDCA-I012 and Settlement Administration Agent (SAA) via a SAA-I014 flow.

References

Document	Author	Date

P383: 'Enhanced reporting of demand data to the NETSO to facilitate CUSC Modifications CMP280 and CMP281' BSC Modification proposal	Simon Lord, First Hydro Company	6 March 2019

Current State

The NETSO calculates TNUoS and BSUoS charges based on different calculations of Settlement data - BM Unit Metered Volumes, Period BMU Gross HH Demand, Period BMU Gross Storage Demand, Period BMU Gross HH Embedded Export, Corrected Period BMU Gross HH Demand, and Period BMU NHH Allocated Volumes. The methodologies for calculating TNUoS and BSUoS charges as well as eligibility for these charges are laid out in the Connection and Use of System Code (CUSC) Section 14 Part 2.

The metered volumes necessary to calculate BSUoS charges are sent to the NETSO in two ways. For BM Units with Metering Systems registered for Central Volume Allocation (CVA), the Central Data Collection Agent (CDCA) sends the CDCA-I012 and Settlement Administration Agent (SAA) sends the SAA-I014 data flow to NETSO. However, for Supplier BM Units with Metering Systems registered for Supplier Volume Allocation (SVA), the volumes are aggregated and sent by the Supplier Volume Allocation Agent (SVAA) to the NETSO using the P0210 TUOS Report[1].

To exclude metered volumes for a given storage facility from TNUoS and BSUoS charges, Suppliers submit a Declaration to SVAA as set out in BSCP602 'SVA Metering System Register'. SVAA validates these Declarations and upon succesful validation instructs the applicable Half Hourly Data Aggregator (HHDA) to submit metered volumes for the given storage facility, which it aggregates and provides to NETSO via the P0210.

[1] BSCP508 'Supplier Volume Allocation Agent' sections 3.2B.16, 3.3.16, 3.13.13, and SVA Data Catalogue Volume 1, Appendix B.

Future State

The process for declaring SVA Storage Facilities as set out in BSCP602 will be expanded to include **Non-Final Demand Facilities.** The CUSC will define the types of facilities that are considered to be Non-Final Demand.

The Declaration Category below is applicable to P419. Future Modifications such as P395 would, if approved, introduce other types of Declarations for specific purposes, and therefore will add to the list of Declaration Categories.

- **Non-Final Demand MSID Declaration**: where a Non-Final Demand facility is located behind one or more Boundary Points with Metering System Identifiers (MSIDs) registered in SMRS by one or more Supplier, the declarant shall specify the relevant SVA Boundary Point Import MSIDs as part of the Declaration.

P419 will extend and rename two data items in the P0210 [1] with both data items now including all SVA Non-Final Demand, not just that applicable to SVA Storage Facilities:

- 'Period BMU Gross Storage Demand' will become 'Period BMU Gross Non-Final Demand' and
- 'Daily BMU Gross HH Storage Demand' will become 'Daily BMU Gross HH Non-Final Demand'.

'Period BMU Gross Non-Final Demand' is the sum of gross Imports for successfully declared SVA Non-Final Demand Facilities, by GSP Group, Settlement Day, Settlement Period, Supplier BMU and Measurement Class.

A Supplier BMUs 'Corrected Period BMU Gross HH Demand' is its Period BMU Gross HH Demand (an existing P0210 data item) minus Period BMU Gross Non-Final Demand.

'Corrected Period BMU Gross HH Demand' is reported by GSP Group, Settlement Day, Settlement Period, Supplier BMU and Measurement Class.

'Daily BMU Gross HH Non-Final Demand' is the sum of all HH values of 'Period BMU Gross Non-Final Demand' in a Settlement Day across all Measurement Classes and is reported by Supplier BMU and Grid Supply Point (GSP Group).

A Supplier BMUs 'Corrected Daily BMU Gross HH Demand' is its Daily BMU Gross HH Demand (an existing P0210 data item) minus Daily BMU Gross HH Non-Final Demand.

'Corrected Daily BMU Gross HH Demand' is reported by GSP Group, Settlement Day, Supplier BMU and Measurement Class.

In order to calculate these new data items, SVAA will need to validate SVA Non-Final Demand Facilities declared by their Operators and Suppliers, and instruct HHDAs to send it HH Imports and Exports[CW1] for related Metering Systems. Therefore the process for declaring SVA Storage Facilities as set out in BSCP602 will be expanded to include **SVA Non-Final Demand Facilities.**

P419 will also extend assurance measures set up to evaluate and investigate SVA Storage Facilities eligibility to Non-Final Demand facilities and, where necessary, to take corrective action to ensure the accuracy of metered volumes reported to NETSO. Declarations will be validated by BSC Central Systems in accordance with the Business Requirements set out in this document.

[1] P210 TUoS report is defined in the SVA Data Catalogue Volume 1. “HHB” is one of the data flow sections.

[CW1]The need for Export data depends on decision on what ESO and the workgroup believes are reasonable validation checks and if those checks require the export data.

Assumptions

The following list represents assumptions that should be taken into consideration when reading the Business Requirements. Please note that for the purpose of this document an ‘assumption’ is defined as a thing (e.g. action, person, document, data item etc.) that is believed to be true provided that P419 is implemented and becomes a part of Business As Usual (BAU) process (i.e. we do not aim to change any of these assumptions).

1. The P419 solution will only cover sites that are SVA Non-Final Demand Facilities.
2. The P419 solution does not change existing calculations necessary to populate the P0210 TUOS Report. It does extend the types of facilities that are reported and change the names of certain items to reflect this in the P0210.
3. The P0210 TUOS Report will continue to be generated and reported from legacy SVAA Systems. However, Elexon Kinnect, in particular the Customer Solution and Data and Calculations platform, will be responsible for the registration of Non-Final Demand Facility details (i.e. declarations and MSIDs), instructing HHDAs to report metered data to it, the subsequent receipt and storage of HH metered data and aggregation of that data. These systems will then share aggregated metered volumes with legacy SVAA for inclusion in the P0210 TUOS report. A ‘Technical Design Passport’ located in the Annex 1 illustrates the relationship between Kinnect and legacy systems.[CW4] [CW5]
4. Although P0210 flow does contain Settlement Data up to a post-Settlement reconciliation run (‘DF’), the NGESO (in line with the CUSC) will only use the data for Settlement Days up to 14 months in the past when calculating the BSUoS charges.
5. Storage Facilities already declared under P383 will not have to be re-declared and will continue under the P419 arrangements as a Non-Final Demand Facility.

Business Requirements

Overview of Business Requirements

The business requirements are split into four distinct areas:

1. Declarations: Process, Management and Scenarios for submission
2. Metered Data for Successful Declarations: Process, Management and Scenarios
3. SVAA provides aggregated metered volumes for successfully declared SVA MSIDs to NETSO
4. BSCCo monitors successful declarations to ensure they remain valid

Please note that items in **bold** in the following Business Requirements tables are defined in the Glossary section of this document. For ease of reading, these items are in bold only the first time they appear in the Business Requirements.

Business Processes

P419 End to End process overview

ELEXON

P419 'Enhanced Reporting of Demand Data to the NETSO to facilitate BSUoS Reform'

End to End Business Process Model (**BPM**)

P419 End to End (E2E) _v0.1 (based on

1. Declarations

Declaration submission and validation.
On behalf of Non-Final Demand Facility Operators, Suppliers must submit Declarations, containing details of SVA Non-Final Demand Facilities, to the Supplier Volume Allocation Agent (SVAA). SVAA must check Declarations and decide whether to accept or reject them. There is the opportunity for Facility Operators to prepare Declarations via the Elexon Website for submission to Supplier Elexon Kinnect Customer Solution accounts to complete, authorise and submit to SVAA. The requirements are written in a way that can be amended and re-used for future Modifications.

Inputs

Ref	Requirement	Priority	BSC Impact
P419-BR-74	**Suppliers submit Declarations** The solution must enable Suppliers to declare Metering Systems for Facilities to the SVAA according to their chosen Declaration Category via a Declaration form available on Elexon Kinnect Customer Solution. The Declaration form, along with guidance, will be set out in BSCP602 'SVAA Metering System and Asset Metering Register', which will re-use/build upon what has already been implemented for Modification P383. *Note: Declarations can be submitted directly by Suppliers who have received Declaration details from Facility Operators, or via an online form on the Elexon BSC Website filled in by Facility Operators after which the Declaration will have flowed into the Supplier's Elexon Kinnect account. In addition, Suppliers can submit a paper based form to the SVAA in the event that online channels are unavailable (as part of a system outage or maintenance).*	**Must Have**	**BSC Section Impacted** BSCP602 (SVA) **BSC Section Impact Type** Amend Obligation
P419-BR-75	**Declaration Form** The Declaration Form is based on the Declaration details set out in BSCP602 'SVAA Metering System Register' and re-uses/builds on what has already been implemented for Modification P383. The Declaration Form must contain the following data items: • Declaration Id (to be assigned by Elexon Kinnect Customer solution, for use when the Supplier when updating or rescinding an existing declaration) *-m* • Declaration Type (predefined list: new, Change of Supplier, Change of Agent, Change of Metering System, withdrawal) *-m* • Declaration Category (predefined list: Non-Final Demand MSID Declaration) *-m* • Declaration Revision Reason - *m if revised* • Final/Non-Final Demand Indicator - *m* • Declaration Set ID** (This will be assigned by the Facility Operator/Supplier and will be referenced where there are multiple declarations relating to a Facility, initial text generated by Elexon Kinnect (TBC)) *-m if relates to Declarations by other Suppliers at the same Facility* • Facility Name** *-m* • Facility Address/Location* *-m* • Facility Description (including size of facility) *-m* • Facility Type (predefined list with option to add an item not already included, TBC, e.g. Storage/Generation/Non-Final Demand/etc.) *-m* • Facility Type Subcategory (predefined list with option to add an item not already included, TBC, e.g. Eligible Services/etc.) *-m* • Facility Effective From Date *-m (discussion whether this can be replaced by a Declaration EFD)* • Facility Effective To Date *-m* • Approval from Category F or A Authorised Person *-m* • Facility Operator's Registered Company Number** *-m* • Operator Name *-m* • Operator Contact Name (Optional)	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** Amend Obligation

- Operator Telephone Number *-m*
- Operator email Address *-m*
- Facility Operator Director's Name *-m*
- Facility Operator 'evidence' - this could be a Director's signed letter (method tbc, could be a confirmation via the Elexon Website or uploaded attachment) OR an uploaded DUoS declaration certificate *-m*
- Total count of MSID(s)** *-m*
- Declaration Set Effective From Date (Effective date of the Declaration Set. The Facility Operator should select the same date as appears on the director's covering letter). *-m if relates to Declarations by other Suppliers at the same Facility*
- Operator Participant ID (provided by the Operator/Supplier) *-m*
- Registered Supplier (Supplier Id, only those MPIDs are available to select that are already registered by the submitting Supplier)** *-m*
- Metering System(s) *-m*
    - MSID *-m*
    - Energy Asset ID / BM Unit ID (??)
    - GSP Group
    - Import/Export indicator *-m*
    - MSID relationship with Facility Effective from Settlement Date *-m*
    - MSID relationship with Facility Effective to Settlement Date *-m*
        - Supplier Effective from Settlement Date *-m (for validation purposes only)*
    - Registered HHDA MPID *-m*
        - HHDA Effective from Settlement Date *-m (discussion whether this is needed or not)*

Mandatory fields are marked with *-m*
*** - indicates Super Items that are part of a related group of Declarations, i.e. Declarations made by other Suppliers for the same Facility. See BR XXX for Super Items.*

Note that data items with predefined list options must be configurable so that they can be changed without the need for development

Further info on Declarations:

- Declaration Type: This is the nature of the Declaration. By identifying the Declaration type in the Declaration document, SVAA will know what business event triggered the declaration and therefore know what validation checks it needs to perform.
- For each Facility the Supplier, in conjunction with its Facility Operator, will allocate a unique 'Facility Name'.
- Total count of MSIDs represents the total number of MSIDs measuring electricity to and from the Facility irrespective of Supplier(s) that registered the MSIDs. But the list of specific MSIDs is specific to the Supplier submitting the Declaration document.
- A Facility will be differentiated by its purpose, we will have more Facilities in upcoming Modifications (e.g. P395) that may not be applicable to Non-Final Demand. Therefore, Facility Type may be a way of differentiating these.
- It may be the case that the Supplier and HHDA may not be the same for the import and export MSID(s).

Note: A Facility may have more than one MSID, and those MSIDs may not necessarily all be registered by the same Supplier. Each Supplier must submit a separate Declaration for its MSIDs, irrespective of whether there are other MSIDs registered by other Suppliers at the same Facility.

P419-BR-76	**Display Declaration form based on selected Declaration Category** The Declaration Category identifies the purpose of the Declaration and therefore the fields on a Declaration Form may vary based on the Declaration Category. When a declarant proceeds to submit a Declaration form, the Elexon Kinnect Customer Solution must display the fields applicable to the Declaration Category selected by the declarant on the Declaration form. Subsequent downstream processes must be applied correctly based on the purpose of the Declaration. Given that there are multiple Modifications relating to Declarations, we expect more Declaration Categories to be required such as P395: EMR MSID, EMR AMSID and EMR CVA BM Unit. Currently, for P419 only Non-Final Demand MSID exists. This would cover P383 sites.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type** N/A
P419-BR-77	**Declaration Category: Non-Final Demand MSID Declaration** Where a Non-Final Demand Facility Operator wishes to exclude a given Non-Final Demand facility from TNUoS and BSUoS charges, then it must declare this SVA Non-Final Demand Facility to SVAA, via its Supplier(s) using the Declaration Category: Non-Final Demand MSID Declaration. • For Non-Final Demand MSID Declarations, all data items referenced in Declaration Form are applicable. • Final/Non-Final Demand Indicator is set to Non-Final Demand. • BSCP602 will be revised to support Non-Final Demand MSID Declarations. It will identify all information necessary (and guidance) to make a Declaration in respect of a Non-Final Demand Facility. • At least one energised import MSID and one energised export MSID must be present as per business rule One import and one export MSID at Facility (energised) • BM Unit (TBC)	**Must Have**	**BSC Section Impacted** Section S-2 13.2 **BSC Section Impact Type** Amend Obligation
P419-BR-78	**Declarations with multiple/related MSIDs** Where a Facility has multiple MSIDs registered by different Suppliers, each Supplier must submit a Declaration with respect to the Facility. Suppliers and Facility Operators can collaborate to ensure that the Total Count of MSIDs and Facility details are consistent across all the related Declarations.	**Must Have**	**BSC Section Impacted** BSCP602 (SVA) Appendix 3.7 **BSC Section Impact Type** Amend Obligation
P419-BR-80	**Supplier-led bulk declarations pre go-live** Where a Non-Final Demand Site Operator is already the subject of a valid declaration with regard to Distribution Use of System Charges (DUoS) charges, before the P419 go-live date, the Supplier of the Facility will be able to submit a complete P419 Declaration on behalf of the site without seeking a signature from a director of the Non-Final Demand facility. In this instance, a pdf copy of the DUOS declaration certificate will suffice as evidence of the Facility Operator's approval.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type** N/A
P419-BR-79	**Bulk submissions: ongoing** Where a Supplier needs to submit many declarations, it should be able to use a mechanism to upload data related to its Declarations in one go, i.e. a bulk upload. Note that this can be aligned with discussions on bulk uploads for P375. Currently, volumetrics are that the highest number of MSIDs in a Declaration is approximately 200. Going forward, we will expect more in a file, so a discussion on acceptable, industry standard limits is required.	**Should Have**	**BSC Section Impacted** BSCP602 (SVA) **BSC Section Impact Type** Amend Obligation

P419-BR-144	**Confirmation upon submission** When Suppliers submit a Declaration, the solution must prompt the Supplier to confirm that the Declaration details are correct and aligned with the Facility Operator. Upon accepting confirmation, the form is submitted for validation, and upon rejection the process stop. Suppliers may receive a signed Declaration in Kinnect via the Elexon Website form, or submit a Declaration directly with the signature. Following any submission, or corrections to what was received from the Facility Operator, (e.g. Supplier recognises a mistake), we need confirmation that the Supplier has confirmed with the Facility Operator that the Declaration has been updated.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type** New Obligation

Mechanism for submitting Declarations

Ref	Requirement	Priority	BSC Impact
P419-BR-81	**Mechanism for submitting Declarations** The Supplier must send its customers' signed Declaration to SVAA via the Elexon Kinnect Customer Solution. A form on Elexon's website will be available for Facility Operators to prepare their part of the form so that upon submission of this Elexon Website form, the form data flows into Elexon Kinnect Customer Solution for Suppliers to amend and/or add to, and submit to SVAA. This data includes the Declaration Form data, and also the following in relation to an online authentication done and captured by the Elexon Website: signatory's email address, IP address and date & time of access (when signed) as part of the Director's Signature, that would come from the Elexon website. However, in exceptional scenarios, such as an outage, a paper based form may be submitted, the Supplier shall send the Declaration document by email or an agreed electronic mechanism and SVAA will load details from it into the Elexon Kinnect Customer Solution. The preferred approach is self-service as it builds in validation and minimises the need for additional manual processes.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-83	**Declarations from Elexon website flow into Elexon Kinnect Customer Solution** The solution must enable all submitted declarations from Facility Operators to feed into Elexon Kinnect Customer Solution for each Supplier identified on the form to complete remaining fields and finalise/submit the declaration for validation.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-84	**BSC Agent (SVAA) is able to enter Declaration data** In the exceptional scenario (such as an outage, system maintenance, etc.) where a paper based Declaration form is received, the solution must enable BSC Agent operators (SVAA) to enter the Declaration according to the applicable Declaration Category via the Elexon Kinnect Customer Solution (Salescloud). The Declaration Form re-uses/builds on what has already been implemented for Modification P383.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** N/A
P419-BR-85	**BSCCo must use reasonable endeavours to ensure that the Declaration template is at all times publicly available on Elexon Kinnect and the BSC Website.** BSCCo must use reasonable endeavours to ensure that the Declaration template is at all times publicly available on the Elexon Kinnect Customer Solution and the BSC Website (BSCP602 and form for Facility Operators to prepare Declarations).	**Must Have**	**BSC Section Impacted** S-2 13.7.1 (a)-(b)? / BSCP602

			BSC Section Impact Type N/A
P419-BR-86	**Authorised signatory approval via Elexon Kinnect** The Elexon Kinnect Customer Solution must have the capability that enables a **non** Authorised Signatory to complete an online BSCP form and submit to an Authorised Signatory for approval and submission to BSC Agents will be available for this solution.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** N/A
P419-BR-87	**Continue to meet Security standards**	**Have**	**BSC Section Impacted** **BSC Section Impact Type**
P419-BR-139	**Enable the capture of digital signatures** The Elexon Website form to prepare Declarations requires a Facility Operator Director's signature. We are exploring the capability to develop a means of capturing the Facility Operator's confirmation / digital signature using an email link to confirm the Director's identity. When a Supplier submits a Declaration, the Elexon Kinnect Customer Solution could also provide this capability, subject to meeting legal requirements of being able to meet the following legal requirements 1. The confirmation link is accompanied by wording on Kinnect that uses clear language that indicates to the signatory that they must apply their 'signature' to sign the contract; and 2. The process involves the signatories accessing the document via a link (access to which may be PIN-protected); and 3. When they sign the document, the platform captures core information such as the signatory's email address, IP address, date and time of access and any PIN entered; and 4. When the document is complete it is circulated as a read-only PDF and will highlight if the document has been altered since the signatures were added.	**Should Have**	**BSC Section Impacted** **BSC Section Impact Type** Amend Obligation

Ref	Requirement	Priority	BSC Impact
P419-BR-88	**Validate Declaration - initial/on screen** The Elexon Kinnect Customer Solution must be able to validate the Declaration form upon submission. Applies to Salesforce Communities and Salescloud. Validation checks: 1. All mandatory fields have been filled in 2. Facility Operator Participant ID is unique 3. Effective From dates are for today or in future (TBC following workgroup on 4/11) 4. Apply existing validation present for existing fields such as BM Unit, MSID, MPID, Effective Dates 5. MSID is not associated with another Supplier (applies to Non Final Demand MSID Declarations) 6. MSID is not already part of another Declaration for the same Declaration Category. 7. HHDA already exists?? 8. Can we check for similar Facility names?	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-97	**Store Declaration Data** Upon successful validation of a Declaration, data from the Declaration form will be stored in Elexon Kinnect Customer Solution (accessible via both Communities and Salescloud).	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (b), BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-98	**Align basic validation of Declaration Form items across Elexon Website**	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** N/A
P419-BR-99	**Suppliers have 3WD to provide further information** Where a validation is incomplete/incorrect and further information has been requested by a BSC Agent operator, Suppliers have 3WD (i.e. 5WD from original Declaration) to submit further information for the Declaration to be valid.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-100	**Validation check timings - BSC Agent** Elexon Kinnect Customer Solution must ensure that BSC Agent operators perform their validation checks within 2WD: • they receive reminders for this activity Elexon Kinnect Customer Solution must ensure that Suppliers are able to provide corrected/completed Declarations following a request for further information, within 3WD (i.e. within 5WD of original submission): • they receive reminders for this activity	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** Amend Obligation

P419-BR-101	**Director's Signature needs to be traceable and stored on Elexon Kinnect Customer Solution** There is a section in the Declaration Form (based on BSCP602) that requires a Director's Signature. These signatures could be either uploaded via paper based submission (Sent by Facility Operator/Supplier to SVAA for IMSERV to upload to the Elexon Kinnect Customer Solution) or as part of the Elexon Website form that Operators can use to prepare Declarations before they flow into the Elexon Kinnect Customer Solution. The online form allows for an email sent to the Director where the validation and confirmation of identity can be completed via clicking an unique URL. The solution should keep these signatures on Elexon Kinnect to allow for traceability. In addition, these signatures should be stored within Elexon Kinnect Customer Solution.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type** N/A
P419-BR-145	**DUoS Certificates as evidence - 6 months** As part of the assessment consultation, there is a consultation question on whether the ongoing use of a DUoS certificate is acceptable or whether this approach should be available for a limited period of time e.g. 6 months. Depending on the response, DUoS certificates can be used as evidence as an alternative to the Director's signature (as currently stated in the P419 Business Requirements), or this option may need to time out after 6 months (including any associated validation checks).	**Should Have**	**BSC Section Impacted** **BSC Section Impact Type** New Obligation
P419-BR-89	**Onscreen validation - pass** If on screen validation has successfully passed, then immediately: • A message is displayed to the user (text TBC) that the Declaration is now pending BSC Agent checks. • A notification is sent to Elexon Market Entry notifying them of a Declaration that has been submitted with details (TBC) including Facility Operator Participant ID. • The Declaration record status (and related entities?) changes to the appropriate status (pending?) to enable BSC Agent operators to complete checks.	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-90	**Onscreen validation - fail** If on screen validation has failed, then immediately: • A message is displayed to the user (text TBC) of the fields that have failed validation with clear and plain English error messages that are easy to understand explaining which data items are missing/incorrect/incomplete. • The Declaration status remains in Draft. • The declarant may make corrections and resubmit	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation

P419-BR-91	**Validate Declaration - BSC Agent checks** The Elexon Kinnect Customer Solution must ensure that BSC Agent operators can further validate the Declaration form upon successful onscreen validation (or data entry if manually entered), within 2WD.. The BSC Agent (SVAA) must use information contained within its own database or in external databases (e.g. SVAA may use, but is not limited to, CMRS, ECOES, Ofgem's Public Register and Companies House) to check the completeness, accuracy and validity of a Declaration: 1. MSID in the Declaration exists (can be part of on screen validation if ECOES API is available by this time) 2. MSID in the Declaration is 'live' (i.e. energised, not disconnected) (can be part of on screen validation if ECOES API is available by this time) 3. Facility Operator's Company (i.e. name and number) and Director's name are registered and current on the government's Companies House website (applicable to Operators registered in the UK) [2]. 4. MSID is not already registered against a different Supplier - to be moved to onscreen validation if this is possible to do 5. MSID is not already registered against a different Non-Final Demand Facility - to be moved to onscreen validation if this is possible to do 6. There is atleast one energised import MSID and one energised export MSID at the Facility. 7. Total count of MSIDs matches actual count of MSIDs 8. Check against the guidance set out in BSCP602. 9. In the scenario where multiple MSIDs are present at the site see BR-96 Validation of Declarations with multiple/related MSIDs 10. Check Supplier and HHDA exist and are appointed to the MSID 11. Validate DUoS exemption certificates Please note that SVAA should not be limited to the above checks and could deploy a different check where appropriate. Elexon Kinnect Customer Solution must provide a reminder to the BSC Agent operator that the BSC Agent checks are due (via a notification/task etc. TBC). [2] https://www.gov.uk/get-information-about-a-company [3] https://epr.ofgem.gov.uk/Document	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation

P419-BR-92	**SVAA investigates where BSC Agent checks identify incomplete/invalid Declarations**
	SVAA investigates where BSC Agent checks identify incomplete/invalid Declarations and liaise with declarants to rectify, within 2WD of declaration submission.
	
	For example, if SVAA has received a Declaration that states that the total number of MSIDs is 2 but the Declaration only lists 1 specific MSID, then in this scenario,
	• Possible cause: SVAA is missing a Declaration from a second Supplier
	  ○ Action to take: SVAA waits to see if a subsequent Declaration is received and follows up with the Supplier.
	• Possible cause: The original Declaration is incomplete for example
	  ○ Missing metering systems for its list of metering system
	  ○ The total count of metering systems declared is incorrect;
	  ○ Action to take: SVAA shall liaise with the Supplier(s) it's received Declarations from.
		Must Have	**BSC Section Impacted**
			
			Section S-2 13.7.1 (a)-(b), BSCP602
			
			BSC Section Impact Type
			
			Amend Obligation

P419-BR-93	**BSC Agent checks - pass** If BSC Agent checks have successfully passed, then within 2WD of submission: • the BSC Agent operator can confirm the declaration is valid. Then immediately:	**Must Have**	**BSC Section Impacted**

	○ a message is displayed to the user (text TBC) that the Declaration is now confirmed as valid, and where multiple Suppliers are present at a Facility, the text (TBC) states that SVAA is waiting for remaining Declarations to be submitted ○ a notification is sent to Elexon Market Entry notifying them that the Declaration is now valid (details TBC), and where multiple Suppliers are present at a Facility, SVAA is waiting for remaining Declarations to be submitted ○ a notification is sent to the declarant notifying them that the Declaration is now valid (details TBC), and where multiple Suppliers are present at a Facility, SVAA is waiting for remaining Declarations to be submitted • The Declaration status changes to the appropriate status (valid/S?) to enable the MSIDs to be used in the collection and aggregation of metered volumes. ○ All other entities are also confirmed e.g. Facility Operators, Contacts, MSIDs ○ Discussion required with CGI as to how this would work		Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-94	**BSC Agent checks - more info needed** If BSC Agent checks have not been successful, and following investigation/liaising with declarants, then, within 2WD of submission: • if further information is required from the declarant, the BSC Agent operator can request this information. Then immediately: ○ a notification is sent to the declarant clearly requesting the missing information (text TBC + is this the original submitter or the Cat A/F?) that the Declaration requires further information. ○ a notification is sent to Elexon Market Entry notifying them of the above (details TBC) ○ the declaration record (and related entities?) status changes to the appropriate status (draft?) to enable the declaration to be updated ○ the declarant has 3WD to submit this information before the declaration record (and related records) is/are (automatically rejected? moved to pending?) ○ Where multiple Suppliers are present at a Facility, all notifications state that SVAA is waiting for remaining Declarations to be submitted	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation
P419-BR-95	**BSC Agent checks - fail** If BSC Agent checks have not been successful, and following investigation/liaising with declarants, within 2WD of submission (or within 5WD of original submission if further information was requested by BSC Agents), then: • the BSC Agent operator can confirm that the declaration is no longer valid. Then immediately: ○ a notification is sent to the declarant stating the reason why it was rejected (text TBC + is this the original submitter or the Cat A/F?) that the Declaration has failed validation. ○ a notification is sent to Elexon Market Entry notifying them of the above (details TBC) ○ the declaration record (and other related entities) status changes to the appropriate status (failed?) to enable the declaration to be updated ○ declaration rejection reason and date are captured. ○ The Supplier is responsible for notifying the Facility Operator of a rejected Declaration. ○ The Supplier can resubmit a Declaration using the original Declaration form data, this would be particularly helpful if the rejection was due to other Suppliers present at a site who have not submitted their Declarations.	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation

P419-BR-96	**Validation of Declarations with multiple/related MSIDs** Where a Facility has multiple MSIDs registered by different Suppliers, BSC Agents (or automatically via Elexon Kinnect) must check that all declarations by all Suppliers present at the site have been received within 5WD of the original submission (note that discussion is required if related declarations come through at different points in the 5WD timeline). Data items marked with an asterisk (*) on Declarations, as per BR-XX-Declaration Form, are 'Super Items'. If a Super Item changes in one Declaration then the entire validity of a Facility becomes 'pending' and would require all related Suppliers to update Declarations, therefore the following data items in particular must be consistent across related Declarations: • Facility Name • Operator's Registered Company Number • Operator Name • Operator Contact Details / address / location • Total count of MSID(s) The only Super Item that would not be consistent across all Declarations for a Facility would be the 'Supplier' data item. A consistent total count of MSID(s) for a Facility will enable SVAA to know how many MSIDs to expect across all declarations for a Facility when validating Declarations.	**Must Have**	**BSC Section Impacted** Section S-2 13.7.1 (a)-(b), BSCP602 **BSC Section Impact Type** Amend Obligation

Validation & processing

Lifecycle of a Declaration

Ref	Requirement	Priority	BSC Impact
P419-BR-102	**Change of Supplier** Where there has been a Change of Supplier (CoS) event, the current Supplier(s) must notify SVAA by end dating the Declaration ETD. The new Supplier(s) must submit a new Declaration for the Facility. A CoS event can also be identified via BSC Agent checks or assurance activities. In this case SVAA will: • confirm the CoS and end-date the Declaration accordingly • notify the new Supplier(s) to submit their Declaration • SVAA validates as per the validation requirements and the CoS specific validation check below CoS Business event (Happy scenario) – i.e. Declarations received from old and new Supplier in order and without any overlap: 1. Supplier (valid current) submits an updated Declaration with an ETD. 2. New Supplier submits a Declaration with an EFD, which equal or greater than current Supplier's ETD. CoS Business event (Unhappy scenarios) • New Supplier submits a Declaration with an EFD, which is before the Suppliers EFD in ECOES.	**Must Have**	**BSC Section Impacted** BSCP602, 2.8 **BSC Section Impact Type** Amend Obligation

	The below diagram illustrates how SVAA should handle CoS where the EFD and ETD conflict The attached business processes explain how SVAA should handle all CoS events. The diagram above shows three scenarios. Each scenario is represented by a line that illustrates the ECOES EFD and ETD of a new Supplier to a Non-Final Demand Facility's Metering System. The first scenario is covered by the 'happy path' scenario described above. The second scenario is invalid because the EFD of the Declaration is before the EFD in ECOES. The third scenario, the old Suppliers Declaration shall become invalid from 20/04/20 (because the Supplier is no longer responsible for the MSIDs at the Non-Final Demand Facility). The new Suppliers Declaration is valid and therefore accepted because it is after the new Supplier's EFD in ECOES. However, this scenario will invalidate the Non-Final Demand Facility because SVAA doesn't hold a valid Declaration for all MSIDs until the new Supplier's Declaration commences. Therefore all related Declarations will be end dated and will need to be re-submitted. Please see the Change of Supplier Event business process (see attached appendix) and Business rules table (also attached) on how a declaration can become invalid.		
P419-BR-103	**Change of Agent** Where there has been a Change of Agent (CoA) event, the current Supplier(s) must notify SVAA by updating the Declaration. A CoA event can also be identified via BSC Agent checks or assurance activities. In this case SVAA will: • SVAA should seek to instruct the new HHDA to request metered volumes as required by the Declaration Category (if not providing already). • Once the new HHDA accepted the appointment, the SVAA must update the Declaration record by end dating the old HHDA, and adding the new HHDA • If no new HHDA or a gap in the current HHDA ETD and new HHDA EFD then Declaration invalidated - TBC requires alignment with existing processes.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type**
P419-BR-104	**Amending Declarations** Where a Supplier needs to correct, or provide further information, or there has been a change in circumstance such as change Facility Operator details, or change of MSID details, then the Supplier(s) (all that have MSIDs at the Facility) must ensure that an updated Declaration is submitted via Elexon Kinnect Customer Solution.	**Must Have**	**BSC Section Impacted** BSCP602 **BSC Section Impact Type**

			Amend Obligation
P419-BR-105	**Withdrawing Declarations** Where a Facility Operator decides to rescind its operation, any Supplier (of MSIDs relating to the Facility) must notify the end date via Elexon Kinnect, providing the Operator Withdrawal Letter and associated Declaration details including Declaration ID provided by the Facility Operator. A Facility can be identified as no longer meeting the definition of a Non-Final Demand Facility as instructed by the BSC Panel, identified during assurance activities. SVAA shall end date all Declarations relating to the Facility, including related appointments (if not being used for any other purposes). Solution considerations for withdrawal letter: PDF upload of letter, or possibly auto generated letter than can be confirmed?	**Must Have**	**BSC Section Impacted** BSCP602 2.5 /.2.6 **BSC Section Impact Type** Amend Obligation
P419-BR-140	**SVAA maintains Declaration status** In relation to each 'Declaration' the SVAA must be able to capture and track changes to the 'Declaration Status' and 'Declaration Rejection Reason' for audit purposes. The changes to values of those items will create a new record, rather than overwrite a previously held value.	**Must Have**	**BSC Section Impacted** BSC Sections S-2 13.7 / K 9.3 **BSC Section Impact Type** Amend Obligation

Below are some examples of business events that trigger Declaration changes:

- New Non-Final Demand facility registering for the first time in Settlement and also declaring as part of the P419 process
- Existing Facility that wants to declare itself in P419 scheme for the first time
- Update existing Declaration/Changes to circumstance
    - Change of Supplier
    - Additional metering is installed or metering is removed
    - Changes to operation of Non-Final Demand facility, i.e. facility is joined by other non-Non-Final Demand activity
- Change of ownership

Lifecycle of a Non-Final Demand facility

- A Non-Final Demand facility can cease to be a Non-Final Demand facility. The operator may install additional equipment's for example additional demand equipment such as a factory etc. which might invalidate the status of the facility
- A Non-Final Demand facility may change the type of Non-Final Demand facility for example, changing from generation to/or with the addition of storage.
- A Non-Final Demand facility can switch between Operators
- A Non-Final Demand facility may change 1 or all its relationship with a Supplier(s)

Lifecycle of a MSID

- A Metering system can switch between operators (as per Business Scenario 5 in the configuration above), but only if the facility has switched operator
- A Metering system can switch between suppliers
- A Metering system can switch between HHDAs
- Whilst being registered to the same Supplier, a Metering system can switch supplier's BM Units (e.g. from a Base BMU to an additional BMU).
- A Metering system can be registered/unregistered
- A Metering system can be energised/de-energised

- A Non-Final Demand facility's Metering Systems can switch between SVA and CVA registered or vice versa but this rarely happens (see P491-BR-26), noteworthy, a Non-Final Demand facility cannot comprise both SVA and CVA metering systems

The following are examples of things that can identify MSID lifecycle events

- Submission/update of a Declaration
- SVAA Daily D0385 validation checks
- SVAA monthly assurance checks
- BSCCo. assurance checks - this can result in the BSC Panel deciding how the Non-Final Demand facility should be treated

Declaration Management

Ref	Requirement	Priority	BSC Impact
P419-BR-106	**Maintain Declarations for 28 months** The SVAA (Elexon Kinnect Customer Solution) shall store Declarations for at least 28 months from the date a Declaration becomes invalid or obsolete (withdrawn).	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type**
P419-BR-107	**Retrospective amendments of Declarations** Where a declaration proves to be incorrect and needs a retrospective amendment then the system must be capable of making these changes by BSC Agent Operators via Salescloud, although the change will only be reflected in the next Settlement Run TNUOS report for the effective Settlement Dates. There will be no retrospective amendments to the TNUOS reports. Declarations will be processed in order of EFD, if a declaration or change in declaration precedes a previously received declaration for a later EFD then it will be rejected and will require a retrospective amendment to be raised if the later version is in fact correct.	**Must Have**	**BSC Section Impacted** BSCP602, 3.7.1.2 **BSC Section Impact Type** N/A
P419-BR-108	**Populate Non-Demand Facility Type as SVA Storage Facility for P383 sites** For those sites that have been declared under P383 as SVA Storage Facilities, i.e. existing P383 records, the Non-Demand Facility Type field must be populated as SVA Storage Facility, or wording agreed during design.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type** N/A
P419-BR-109	**Declaration by portfolio (interim)** Following BSC Modification go-live and in advance of the CUSC Modification go-live in April 2023, enable Non-Final Demand Facility Operators to easily provide Declarations for their entire portfolio, i.e. for all Non-Final Demand facilities in one go. This could be by providing a single Director's signature for their entire portfolio. Note: may require further discussion with the workgroup	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type**
P419-BR-141	**Change of circumstance check for Declarations** Upon a change of circumstance, such as transfers or Supplier of Last Resort (SOLR) scenarios, BSC Agent operators must perform a check to see if the Supplier has any valid or upcoming Declarations, and inform Elexon so that Elexon can keep the new Supplier informed.	**Have**	**BSC Section Impacted** SVAA Service Description **BSC Section Impact Type** New Obligation
P419-BR-142	**SVAA maintains audit of Declaration change**	**Must Have**	**BSC Section Impacted**

	In relation to each 'MSID' in a 'Declaration' record, the SVAA must be able to capture and track changes to 'Supplier ID', 'Supplier Effective From Date', 'Supplier Effective To Date', 'Registered HHDA', 'HHDA Effective from Settlement Date' and 'HHDA Effective to Settlement Date' for audit purposes. The changes to values of those items will create a new record, rather than overwrite a previously held value. An audit trail must be maintained for the remaining data items within Elexon Kinnect (Salescloud).		**BSC Section Impact Type**

Business Rules

P419-BRL-3 A single Declaration for MSIDs registered by the same Supplier.

A single Declaration must only contain Declarations for MSIDs that are all registered by the same Supplier. Therefore, there may be more than one Declaration for a single SVA Non-Final Demand Facility if the related Metering Systems are registered by more than one Supplier.

P419-BRL-4 A single Declaration by Supplier may contain multiple Facilities.

A Declaration submitted by a Supplier may contain Declarations for multiple Facilities. (Please refer to the Facility site configuration)

P419-BRL-5 Non-Final Demand Facility Declaration Category

SVA Non-Final Demand Facilities, i.e. those are located behind one or more Boundary Points with MSIDs registered in SMRS by one or more Suppliers, the Declaration Category will be Non-Final Demand MSID Declaration.

P419-BRL-6 Declarations must be submitted in the correct order

Declarations must be submitted in the correct order

P419-BRL-7 Declaration Authorised Signatories: Category F and Category A

Only Authorised Signatories Category A and F are able to submit a Declaration Form.

P419-BRL-8 Declarations shall not be retrospective

Declarations submitted by BSC Parties shall not be retrospective.

Under the circumstance where a change is retrospective change is required, this will be assessed and made manually. There will be no change to the metered volume process.

P419-BRL-9 One import and one export MSID at Facility (energised)

For a Non-Final Demand Facility, there must be at least one energised import MSID and one energised export MSID at the Facility for a Declaration to be valid.

Notes:

- The export MSID must be part of a valid Declaration.
- The MSIDs for a SVA Non-Final Demand Facility may be registered by more than one Supplier and notified to SVAA in more than one Declaration.

The reason for atleast one import and export is to support analysis of Non-Final Demand data to check for anomalies in the volume of export compared to the volume of import. Export MSIDs do not have to be declared under P395 as they are all generation licence holders, however, a check for an existing export MSID will be made.

P419-BRL-2 Imports to and Exports from an SVA Non-Final Demand Facility must only be measured by SVA Metering Systems

The Imports to and Exports from an SVA Non-Final Demand Facility must only be measured by SVA Metering Systems; it cannot be the subject of SVA and CVA Metering Systems.

Queries

P419-Q-12 Simplifying EFDs - single Declaration EFD

There are multiple EFDs
- Facility EFD
- Supplier registration of MSID EFD
- HHDA appointment for MSID EFD

- etc.

Ultimately, the Declaration EFD is when a valid, live Facility is associated with a valid, live MSID for the Supplier that provided the Declaration, that has an appointment. This should be the main EFD on the Declaration/Declaration form.

It would be useful to have a single Declaration EFD that drives whether volumes for an MSID are used as part of the Non-Final Demand calcs going into P0210. This EFD would be valid if the requisite steps have been done, i.e. MSID is associated with Facility. Any other EFDs can support validation activities e.g. if there is a Supplier-MSID EFD, then we can use this to check ECOES if the Supplier is indeed the registrant of this MSID. HHDA appointment for the MSID can be optional as this needs to be looked up on ECOES anyway.

Similarly, for an ETD, the single ETD drives whether the volumes for an MSID are included in the P0210, and this ETD ends the relationship between the Facility and the MSID.

P419-Q-13 Pending status for future CoS Declarations

There have been some instances where a Supplier has submitted a Declaration for the future. This would not be valid as the future Supplier would not be associated with the MSID in ECOES, however, is there an option to create a 'pending' status to cater for such scenarios?

P419-Q-14 Organisation/Facility Operators

If the organisation is Facility Operator, is it possible to make the participant ID optional in tis case? Otherwise we are creating a participant ID for the system that is not used elsewhere.
Can a Facility Operator organisation also be a BSC Party at the same time? And vice versa? And what is the impact in particular on the Party ID?

P419-Q-15 Generic use of Facility Operator & re-labelling

P419 expands on P383. Is it possible to repurpose Storage Facility as Facility Operator, and re-label it to Facility Operator? We then need a way to identify those that are Storage Facilities, Non-Final Demand etc. We would also be future proofing it for P395 which will have it's own Facility Operator with a particular type to identify it for P395 purposes. Currently there is Facility Type, but perhaps a second field is needed as a Facility Type sub category.

P419-Q-16 Discussion needed on deadline for submission of related Declarations

Currently, the timeframe is for submitting all related Declarations within 5WD of the original submission. Need to work through scenarios where Declarations come in at 3WD but require further info and therefore if subsequently resolved within the 3WD timeframe, are these still valid.

P419-Q-17 Declaration states

Need to work through the various Declaration states with CGI.
Also need to consider incomplete Declarations.

P419-Q-18 Declaration Signature

Can we facilitate an automated mechanism to allow Facility Operator Director's to sign a Declaration via Kinnect if Suppliers are entering/completing/submitting a Declaration

We may need to add additional data items e.g. Directors email

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2. Metered Data for Successful Declarations: Process, Management and Scenarios (HHDAs and SVAA)

Instruct and Report Metered Volumes for successfully declared Metering Systems

SVAA should obtain metered volumes for Metering Systems, which were successfully declared by Suppliers. HHDAs must report to the SVAA the metered data for the MSIDs (Declarations) it was instructed to provide.

Metered Volume Process

Ref	Requirement	Priority	BSC Impact
	SVAA instructs HHDA to report Metered Data	**Must Have**	**BSC Section Impacted**

P419-BR-32	Within 1 WD of confirming that a Declaration is valid, SVAA must determine whether it has already instructed a HHDA(s) to report Metered Data for the MSID(s) identified in the Declaration for other processes.
	
	Where no prior instructions are in place (or are due to take effect before the Declaration EFD), SVAA must send an instruction to the registered HHDA(s) indicating that they must start reporting Metered Volumes for a specified MSID(s) from the Declaration EFD. For avoidance of doubt, the SVAA can instruct a HHDA to report Metered Volumes for this process, as well as in respect of any other processes that SVAA that would require data to be sent using the D0385, e.g. TERRE, Behind the Meter, etc.
	
	SVAA must use the D0354 to instruct the appointed HHDA(s) to report Metered Volumes to the SVAA (please see HHDA appointment flowchart) (this instruction only applies where the Declaration Category is Non-Final Demand MSID Declaration).
	
	The following business events that can trigger SVAA to send Metering System Reporting Notification (D0354) to the HHDA are as follows:
	• Newly declared Non-Final Demand facility successfully validated by SVAA i.e. the very 1st notification sent to an HHDA about a MSID
	• Change of Agent where an existing Declaration is updated i.e. new HHDA now associated with a Facility's import or export MSID(s).
	• Non-Final Demand facility installs 1 or more metering systems, the new metering system needs a HHDA to send in metering data
	• Non-Final Demand facility removes 1 or more metering systems
	• The entire facility has been withdrawn, as such we need to de-appoint the HHDA(s). However, SVAA should not de-appointment in all cases (please see HHDA de-appointment flowchart)
	  ○ The solution should be able to consider the need for Metered Data from a single MSID for all related processes, e.g. for P383, P344 and P354. (as per BR2.09)
	  ○ Therefore, a need to de-appoint for a particular MSID in the P383 process should not result in the HHDA ceasing to send Half Hourly metered data for that MSID where P344 and P354 processes continue to require it.
	• SVAA has already sent an appointment to the HHDA for another process (for example as part of P344 process) but the Effective from date is later than the required effective from date of the P419. Therefore SVAA should send a second D0354 appointment with an EFD for P419
	
	Noteworthy declarations are likely to be open-ended (i.e. have no ETD on initial declaration), therefore HHDA appointments are likely to be open-ended. However, we understand that P344 and P354 have finite registrations (even if they are very long periods) and so the HHDA appointment for these may also be limited. SVAA should ensure that where Metered Data is required for P419 and P344/354 (or another process in future) it should ensure the HHDA appointment reflects the most long-standing overall requirement. For example, an open-ended Declaration will last longer than a limited P344 registration, therefore the HHDA appointment should reflect the open-ended declaration (and so may need to be updated where necessary).
	
	Possible origin of trigger
	• Operator is told by the BSC Panel to install or remove a metering system via BSCCo.
	• SVAA receives a new Declaration with updated HHDA detail
	• SVAA registration record highlights data mismatch
			BSC Section S-2, 13.4, 13.5
			
			BSC Section Impact Type
			
			Amend Obligation

- SVAA stops receiving metering data as such the SVAA Operator will investigate

The following scenarios will not generate a new D0354 file:

- The HHDA has already been appointed based on their association to the MSID for P344, P383 and or P354 or any other BSC process i.e. SVAA is already receiving Half Hourly metered data volume (D0385) and is not due to end reporting Metered Data before or during the P419 Declaration takes effect.
- SVAA has sent an appointment to the HHDA (For example as part of P344 process) but the Effective from date is earlier than the required effective from date of the P419.
    - Pending receipt of either Metering System Reporting confirmation (D0355) or Metering System Reporting rejection (D0356).
- There is an ongoing investigation by the Operator due to incorrect standing data held in ECOES.
- The HHDA has confirmed appointment (to take effect on or before the P383 Declaration EFD) by sending a D0355 but is yet to start sending Half Hourly metered data volume (D0385) to SVAA.

The following business events will require SVAA to re-send D0354 file:

- P344 and/or P354 process triggers de-appointment with an ETD which is later than the EFD of P419
- P344 and/or P354 process triggers de-appointment with an ETD which is earlier than the EFD of P419

In both cases, SVAA should send a D0354 to ensure that HHDA appointment will continue to provide metered data for the duration of the P419 Declaration.

The below diagram illustrates the business scenarios that will require SVAA to re-send D0354 for HHDA appointment. Noteworthy, in the 1st timeline scenario the P419 effective from date will supersede the P344 effective to data i.e. SVAA need to ensure that the de-appointment of the HHDA for P344 does not disrupt the submission of Half Hourly metered data volume (D0385) for theP419 effective from date. Therefore SVAA should resend the D0354 to set the ETD in line with the P419 requirement.

[CW1]

Noteworthy, the effective to date may be null (i.e. open ended)

P419-BR-33	**SVAA ensures file sequence numbers are unique**	**Must Have**	**BSC Section Impacted**

	Where SVAA sends a D0354 to instruct HHDA to report Metered Volumes for the MSIDs declared against SVA Non-Final Demand Facility, the SVAA must ensure that the File sequence number is unique and does not override or confuse instructions made for other processes (e.g. appointments made for P344/354 processes).		BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation
P419-BR-34	**SVAA resolves rejection of appointment** Where a HHDA rejects an appointment, the SVAA should check ECOES and liaise with the HHDA and Supplier to understand the reason for rejection so it can resolve and subsequently confirm the/an appointment (by resending a D0354).	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation
P419-BR-41	**HHDAs confirm/reject appointments** HHDA must confirm or reject the SVAA appointment using the D0355 or D0356, respectively within 1 WD from receiving the appointment.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation
P419-BR-42	**HHDA reports metered volumes** In accordance with SVAA Settlement Calendar, for each Settlement Day, the HHDA must report HH Metered Volumes (i.e. Allocated Metering System Metered Consumption (AVMMCHZaNLKji)) for all MSIDs it has been instructed to report on. HHDA must report these volumes in time to achieve the dates set out in prevailing SVAA calendar and in accordance with prevailing aggregation process timescales set out in BSCP503.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation
P419-BR-43	**Format for sending metered data** The HHDA must send metered data to the SVAA using the D0385. The data will not be accepted in any other format. Where for a Settlement Day, the HHDA is required to report metered data to the SVAA for more than one process then the HHDA will only send a single D0385 to SVAA in respect of all process for any other current instructions made by the SVAA. SVAA must be able to receive D0385 either by the DTN or as agreed with the HHDA (in accordance with PSL100).	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation
P419-BR-44	**HHDA continues to report metered data**	**Must Have**	**BSC Section Impacted**

	Following a successful instruction to report metered data, the HHDA must continue to send metered data to SVAA until either it ceases to be the appointed HHDA for the MSID(s) in SMRS, e.g. following a change of supplier (CoS) or change of Agent (CoA) event, or if the SVAA sends an instruction (D0354) to cease reporting, i.e. with an Effective to Date.		BSC Section S-2, 13.4, 13.5 **BSC Section Impact Type** Amend Obligation

Management of Metered Volumes

Ref	Requirement	Priority	BSC Impact
P419-BR-35	**SVAA receives, processes and stores metered data** SVAA must process and store all received metered data received in relation to successfully Declared MSIDs where the Declaration Category is Non-Final Demand MSID Declaration, except for: • The data that was sent for MSIDs that are not a subject of a current and valid Declaration (and is not necessary for other BSC processes); or • Where the SVAA does not hold a record for the MSID and so is not expecting to receive data for that MSID (for P419 or any other BSC process). To do this, SVAA shall differentiate the use of metered data for Non-Final Demand facilities, from other processes such as P344, P375, etc.).	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation
P419-BR-29	**SVAA investigates exceptions in metered data** Upon receipt of metered data from HHDA (using D0385), the SVAA must investigate instances where: • it receives metered data for a declared MSID, but Supplier ID in D0385 is different to Supplier ID in SVAA registration record; or • it receives metered data from a HHDA for a declared MSID that is different to HHDA in SVAA registration record for a given Volume Allocation Run. • it receives metered data for an MSID that is not associated with a valid, current Non-Final Demand Declaration for the Settlement Date • it receives metered data for an MSID that is not associated with the HHDA on the Declaration record The SVAA should investigate instances where it does not receive metered data for an MSID when it is expecting data as per P419-BR-38 ' SVAA updates instructions following changes to Declarations'.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation
P419-BR-36	**SVAA aggregates metered data** These volumes will undergo similar Volume Allocation Run (VAR) processing as the 'Period BMU Gross HH Demand' (as introduced for BSC Modification P348). In order to aggregate these volumes, the current data item 'Period BMU Gross Storage Demand' will need to be renamed 'Period BMU Gross Non-Final Demand' In order to calculate Period BMU Gross Non-Final Demand using the Allocated Metering System Metered Consumption (AVMMCHZaNLKji) reported in the D0385, the SVAA will need to derive equivalents of the following existing Settlement data items that are specific to SVA Non-Final Demand Facility metered volumes only: • BM Unit's Metered Consumption ($BMMC_{iaNLj}$), • Half Hourly Consumption (Non Losses) (C_{inj}), • BM Unit's Metered Consumption Losses ($BMMCL_{iaNLj}$), • Half Hourly Consumption (Losses) ($CLOSS_{inj}$) and • Corrected Component ($CORC_{inj}$).	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation

	For avoidance of doubt, the P419 solution is identical to the current P383 process, but widens the scope of sites beyond Storage. The P419 solution does not aim to change the way the above values are currently calculated for normal Settlement purposes. For the avoidance of doubt, whilst BMMC and BMMCL are ordinarily determined by HHDAs and reported to SVAA, P419 requires SVAA to determine equivalents of these values by using the Allocated Metering System Metered Consumption (AVMMCHZaNLKji) reported in the D0385. These calculations will not differ from those already implemented for P383 except that additional facilities will be incorporated. 'Period BMU Gross Non-Final Demand ' is the sum of HH settled Active Import Corrected Components (CORC) per Settlement Day, Settlement Period, Supplier BMU and Measurement Class collected via D0385 for MSIDs in valid and current (i.e. (live) Declarations. Therefore, 'Period BMU Gross Non-Final Demand' for each relevant Measurement Class should be derived by summing the CORC for the relevant CCC IDs (i.e. those related to Half Hourly Active Import). Currently the relevant CCC Ids are as follows (although these should not be hard-coded into systems as CCC IDs and their relationships to MCs can change): • Measurement Class C – CCC IDs 1, 3, 4, 9, 11, 12 • Measurement Class E – CCC IDs 23, 25, 26, 28, 30, 31 • Measurement Class F – CCC IDs 42, 43, 44, 45, 46, 47 • Measurement Class G – CCC IDs 54, 55, 56, 57, 58, 59 To satisfy requirements from the NETSO, SVAA must calculate and report the following additional values: • 'Corrected Period BMU Gross HH Demand' will be introduced which is, for every SP, the difference between the 'Period BMU Gross HH Demand' and the 'Period BMU Gross Non-Final Demand'. • 'Corrected Daily BMU Gross HH Demand' which is the sum of 'Corrected Period BMU Gross HH Demand' in a Settlement Day. • 'Daily BMU Gross HH Storage Demand' which is calculated similarly to 'Daily BMU Gross HH Demand' except is the sum of Period BMU Gross Non-Final Demand for each SD.		
P419-BR-37	**SVAA checks for metered data** When aggregating metered data for a given Settlement Day, SVAA must check that it has received Metered Data for all MSIDs it expects to have received Metered Data for. Missing Metered Data will trigger SVAA to follow the process in BSCP508 3.2A.3.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation
P419-BR-38	**SVAA updates instructions following changes to Declarations** Where changes were made to a Declaration record (MSIDs added to or removed from the record), then SVAA has to send updated instruction flow(s) to the relevant HHDA(s) in line with P419-BR-32 'SVAA instructs HHDA to report Metered Data'.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation

P419-BR-39	**SVAA de-appoints HHDA** Where SVAA discovers that: • A given HHDA is not the SMRS registered HHDA for a facility's MSID(s); or • A given MSID is no longer eligible to be a part of Declaration (e.g. disconnected MSID) and that MSID is not a part of any other instructions made by SVAA (e.g. P344/354process) Then SVAA should de-appoint HHDA by sending D0354 with the 'Effective to Settlement Date {MSCM}' set to reflect the date on which the HHDA should cease reporting metered data. For avoidance of doubt, when deciding if it must de-appoint a HHDA from reporting metered data for P419 purposes, the SVAA must consider whether the appointment should remain in place to support another concurrent BSC requirement, e.g. where SVAA requires data for the MSID to support a P344 process. Where another concurrent requirement remains in place, the SVAA must not de-appoint the HHDA. Only where there is no other ongoing requirement for an individual MSID's metered data should the SVAA de-appoint an HHDA following a change to a Declaration.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation
P419-BR-40	**HHDAs continue to provide metered data to SVAA for other processes if needed** Where a HHDA is instructed to report metered data to SVAA for any MSID (whether under this process or another process e.g. for P344/P354 purposes), the HHDA must continue to report metered data to SVAA. Such reporting must continue until it is instructed by SVAA to cease or it is the subject of a successful Change of Agent initiated by a Supplier.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.5, 13.7 **BSC Section Impact Type** Amend Obligation

3. SVAA provides Aggregated Metered Data for Declared MSIDs to NETSO

SVAA must provide aggregated metered volumes for successfully declared SVA MSIDs to the NETSO.

Ref	Requirement	Priority	BSC Impact
P419-BR-45	**SVAA reports Non-Final Demand via P0210 to NETSO** SVAA must report 'Corrected Period BMU Gross HH Demand', 'Period BMU Gross Non-Final Demand' and the 'Daily BMU Gross HH Non-Final Demand' to the NETSO via the P0210.	**Must Have**	**BSC Section Impacted** BSCP602, 1.1.2 **BSC Section Impact Type** Amend Obligation
P419-BR-46	**SVAA adheres to existing P0210 timescales** The SVAA must continue to send the P0210 to the NETSO in line with timescales set out in BSCP508.	**Must Have**	**BSC Section Impacted** BSCP602, 1.1.2 **BSC Section Impact Type** Amend Obligation

P419-BR-47	**P0210 amendments** The P0210 flow must be modified to accommodate for the additional information being reported. The following data item will be renamed in the 'HHB' group: • 'Period BMU Gross Storage Demand' to 'Period BMU Gross Non-Final Demand' The following data items will be renamed in the 'TO3' group: • 'Daily BMU Gross HH Storage Demand' to 'Daily BMU Gross HH Non-Final Demand'	**Must Have**	**BSC Section Impacted** BSCP602, 1.1.2 **BSC Section Impact Type** Amend Obligation

P0210 Interim Requirements

Ref	Requirement	Priority	BSC Impact
P419-BR-63	**Old and new P0210 versions running in parallel** SVAA must continue to provide Storage Facility metered volumes applicable for dates prior to 1 April 2023 until the final Settlement Run for these dates. It may be that the current P0210 version runs alongside a new P0210 version created for Non-Final Demand Facilities under P419.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type**

4. BSCCo monitors successful declarations to ensure they remain valid

BSCCo must monitor successful Declarations to ensure that they remain valid[CW1] .

Ref	Requirement	Priority	BSC Impact
P419-BR-59	**SVAA shall end-date Declaration on instruction from the Panel** Where BSCCo/Panel direct that a change should be made to one or more Declarations made by a Supplier with respect to Non-Final Demand Facility, SVAA/CRA (via Elexon Kinnect Customer Solution) will end date any Declarations in effect or due to take effect after the Panel's determined ETD.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** New Obligation,Amend Obligation
P419-BR-72	**Metered volumes no longer collected for end-dated Declarations (P419 only)** For Declarations that have been end-dated as a result of Panel direction, SVAA shall ensure that: 1) metered volumes are no longer received from HHDAs with respect to the MSIDs referenced in the end-dated Declaration, and therefore **not** aggregated and provided to NETSO via the P0210. 2) where HHDAs have been instructed to provide metered volumes for the MSIDs referenced in the end-dated Declaration, for purposes other than P419, i.e. for TERRE (P344), ABSVD (P354), Behind the Meter calculations (P375), etc. the HHDAs continue to provide metered volumes, but these are not included in the P2010 for the purposes of P419.	**Must Have**	**BSC Section Impacted** **BSC Section Impact Type** New Obligation
P419-BR-60	**Panel instruct SFO withdrawal** To 'Wipe-down' Declaration(s), the BSCCo/Panel shall be able to instruct that a Non-Final Demand Facility's record is withdrawn entirely – Elexon Kinnect (PMP) still recognises the Facility but that it was withdrawn (end dates the Facility / Declaration record) and so in effect no data is reported for Facility – that is until a new, valid declaration is accepted.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type**

			New Obligation,Amend Obligation
P419-BR-61	**SVAA rebuilds Non-Final Demand Facility Declaration records** Elexon Kinnect (PMP) shall allow a Non-Final Demand Facility's Declaration record to be rebuilt for example where a Facility had been withdrawn, whether by the Operator providing new declarations or BSCCo directing how a record should be rebuilt therefore not re-creating a record for the Facility Operator.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-48	**Declarations Report to BSCCo** SVAA should make the metered data for every MSID subject to a Declaration (current and past) available to BSCCo. In addition, SVAA should also share the registration details (in line with P419-BR-57 'SVAA receives and stores Declarations') about all declared SVA Non-Final Demand Facilities (both current and past). The BSCCo will turn the data provided by SVAA into a Declarations report on a monthly basis. The report should show the total imports and exports per SVA Non-Final Demand Facility and Supplier BMU over the reporting period (broken down by the Measurement Class), and a breakdown of the numbers of Declarations accepted and rejected, and the numbers exceptions (e.g. sites/MSIDs identified as being invalid or erroneous) over the period. The data to be made available to BSCCo shall include the following: • Metered Data, i.e. extracted D0385 data: ○ MSID ○ Settlement Day ○ Settlement Period ○ Run Type (latest only) ○ GSP Group ○ BMU ID ○ CCC ID ○ LLFC ID ○ Metered Data • Non-Final Demand Facility details: ○ Non-Final Demand Facility Name ○ Non-Final Demand Facility Operator Name ○ Non-Final Demand Facility Declaration start date ○ Non-Final Demandt Facility Declaration end date ○ Declaration ID ○ Declaration Status ○ Declaration Rejection Reason ○ Supplier BM Unit ID ○ Non-Final Demand Facility Type? GSP Group	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-49	**BSCCo investigates and reports anomalies to Panel** BSCCo on a monthly basis must analyse the Declarations Report and investigate any perceived anomalies further, e.g. unusual levels of Imports or Exports that might suggest the Declaration is invalid. As part of any further investigation, BSCCo shall give an Operator and/or Supplier an opportunity to make representations. Where appropriate, the BSCCo shall report its findings, any representations made to it by the Operator or Supplier and recommendations to the BSC Panel.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
	SVAA excludes MSIDs if instructed by Panel	**Must Have**	**BSC Section Impacted**

P419-BR-50	The Panel upon reviewing any evidence provided by BSCCo may decide to exclude a given MSID from a Declaration or end date the Non-Final Demand Facility. In such instance, the Panel will instruct SVAA to amend its records. SVAA must be able to exclude specific MSIDs from its calculations in P419-BR-36 'SVAA aggregates metered data' and for the related Declaration(s) (i.e. remaining MSIDs) to remain valid. SVAA should exclude an MSID in the calculation of Period BMU Gross Non-Final Demand only for as long as the related Declaration remains invalid. That is, should a new Declaration (not an update to existing one) with the previously excluded MSID be successfully validated by SVAA then that MSID should be included in the SVAA's calculations per P419-BR-36 'SVAA aggregates metered data' in respect of the new Declaration.		BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-51	**SVAA maintains records of invalid Declarations** Where the Panel deemed that a Declaration or part of a Declaration has become invalid, the BSCCo must notify the Supplier(s) within 1WD of receiving the Panel update and update its records. As a result, invalidated Metering Systems metered data shall be excluded from aggregation in BR2. SVAA should maintain records of invalid Declarations and details of why it concludes that a Declaration is/becomes invalid.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-52	**Maintain and publish Non-Final Demand Facility list** BSCCo must publish on the BSC website (or via an agreed mechanism) and maintain a public record of all SVA Non-Final Demand Facilities that have a current valid Declaration(s). The report shall be published on a monthly basis, this record will be a list showing the SVA Non-Final Demand Facilities' Name and GSP Group ID only. The report shall include the following information: • Non-Final Demand Facility Name • GSP Group • Non-Final Demand Facility overall Declaration start date • Non-Final Demand Facility overall Declaration end date (where specified)	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-53	**BSCCO publishes metered volumes for valid Non-Final Demand Facilities** BSCCo must publish on the BSC website [or via an agreed mechanism] on a monthly basis a report on Non-Final Demand Metered volumes for a given Settlement Day. The data should be a sum of all Metered Data collected by SVAA for all valid Non-Final Demand Facilities. The report should be broken down by Import and Export Metered Volumes[CW1] , Settlement Day, Settlement Period and GSP Group. The Non-Final Demand Metered volumes report shall be created using the data items specified in P419-BR-48 'Declarations Report to BSCCo' BSCCo should ensure not to publish Metered Volume data that may be attributed to a single Non-Final Demand Facility – if there is only a single Non-Final Demand Facility in a GSP Group, then BSCCo should consider combining GSP Group data to maintain anonymity and explain what rules it may use from time to time. BSC Panel may from time to time amend the content and frequency of reporting. Solution consideration: the mechanism for publishing the data needs agreement, for example the data can be made available to the Analysis & Insights platform for publication via Azure. [CW1]Does this provide any benefit?	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation

P419-BR-54	**Reporting Non-Demand Facilities that fail Non-Final Demand Facility criteria** Where a Market Participant, Non-Final Demand Facility Operator or any other interested non-BSC party believes that a given Non-Final Demand Facility does not meet the required criteria for the Non-Final Demand Facility, then they could report such a Non-Final Demand Facility to BSCCo. When raising a concern in regards to a specific Non-Final Demand Facility, the interested party should provide a rationale and evidence that the site does not meet the criteria. BSCCo will then perform a series of checks (as per P419-BR-49 'BSCCo investigates and reports anomalies to the Panel') to determine whether the site is suspicious and should be reported to the BSC Panel.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation
P419-BR-56	**SVAA reviews validity of current Declarations each month** On a monthly basis, SVAA should re-check the validity of all current Declarations. The SVAA should perform the same checks as set out in P419-BR-20 'SVAA validates Declarations'.	**Must Have**	**BSC Section Impacted** BSC Section S-2, 13.7, 13.8 **BSC Section Impact Type** Amend Obligation

Impact Summary

An assessment has been undertaken in respect of the Code and Code Subsidiary Documents and the following have been identified as being impacted by the BSC Change.

Item	Impacted (H/M/L)	Identified area	Approving committee
Code	M	Section K, S, S-2, X-1, X-2	Authority
BSCPs	M	BSCP503, BSCP508, BSCP602	SVG (BSCP503, BSCP508) Panel (BSCP602)
BSC Agent Service Descriptions	M	SVAA, CRA	SVG, ISG
Codes of Practice	No impact		
Party Service Lines	No impact		
Data Catalogues	L	SVA Data Catalogue	SVG
Communications Requirement Document	No impact		
Reporting Catalogue	No impact		
Interface Definitions	No impact		

Risk & Complexity Assessment

Complexity

The scope of the change is defined based on its complexity as follows:

- High – new threads of systems/processes and associated interfaces are introduced;
- Medium – only existing threads of systems/processes and their interfaces are affected;
- Low – only a single system/process and no interfaces are affected.

Therefore, P419 has a 'medium' complexity because it seeks to build on existing processes and systems (i.e. introduced by P383) by expanding the definition of eligible sites that can be excluded from the BSUoS charges.

Risk

It is believed that the amendments required to support P419 pose a low risk, as the solution does not have a material effect on trading or Settlement calculations (automatic or manual) and has no potential impact on the integrity of Settlement.

Glossary

The table below represents terms which we will introduce as a part of this P419 Modification. Terms, which are defined in the Balancing and Settlement Code or Code Subsidiary Documents, were omitted.

Term	Meaning
Non-Final Demand Facility	As defined in the CUSC
Non-Final Demand Facility Operator	Means a Business that is responsible for the day to day operation of a Non-Final Demand Facility
Declaration	means a declaration made by Non-Final Demand Facility Operator in respect of Non-Final Deman Facility in accordance with BSCP602;

[CW1]Need to double check once CUSC legal text is agreed.