Change Proposal – BSCP40/02	**CP No: CPXXX** *Version No: 0.1* *(mandatory by BSCCo)*

Title (mandatory by originator)

Amendments to BSCP128 to enable Embedded LDSOs to calculate and submit Site Specific LLFs as required.

Description of Problem/Issue (mandatory by originator)

Line Loss Factor (LLF) Methodology Principle 1 in BSC Procedure 128 'Production, Submission, Audit & Approval of Line Loss Factors' (BSCP128) requires Licensed Distribution System Operators (LDSOs) to calculate Site Specific LLFs for:

a) Sites that are connected at Extra High Voltage (EHV); or
b) Where the customer has requested a Site Specific LLF, and the LDSO is in agreement.

The following issues could prevent Embedded LDSOs from successfully calculating and submitting Site Specific LLFs;

Embedded LDSOs require Host LDSO LLFs at the boundary between the Embedded LDSO network and the Host LDSO network, to calculate Site Specific LLFs for the EHV site connected to that network. In BSCP128 there is no requirement for Host LDSOs to calculate LLFs at this boundary. Nor do Host LDSOs have metered data or technical data of the embedded network to enable a calculation at the boundary. There is also no requirement for Embedded LDSOs to provide metered data to the Host LDSO to enable this calculation.

In addition, the BSCP128 annual LLF submission deadline is the same for Host LDSOs and Embedded LDSOs submitting Site Specific LLFs. If the Host LDSO boundary LLFs are not ready until the submission deadline, it is then too late for the Embedded LDSO to obtain the boundary LLFs and provide a Site Specific LLF submission. The Host LDSO may also refuse to provide the required LLFs, as there is no obligation to do so.

Also, if a Host LDSO provides unapproved LLFs for the Embedded LDSO LLF calculation, the Embedded LDSO will need to recalculate its LLFs if the Host LDSO LLFs are recalculated due to an audit issue. There is no clarification in BSCP128 that accounts for this scenario.

Proposed Solution (mandatory by originator)

This CP proposes the following updates to BSCP128:

- Add deadline for Embedded LDSOs to request network boundary LLFs from Host LDSOs, for the upcoming BSC Year.
- Add obligation for Host LDSOs to provide any requested network boundary LLFs to the Embedded LDSOs by 1 October. For example, where there is an embedded EHV site, the Host LDSO calculates and provides an LLF at the embedded metering boundary.
- Add requirement for the Embedded LDSO to ensure that the Host LDSO has enough metering (historical 365x48 Half Hourly demand profile) and technical information to enable that calculation.
- Amend the submission deadline for Embedded LDSOs that do not Mirror to 31 October, to give the LDSO at least 20 Working Days (WD) to obtain the boundary LLFs, run the

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calculations and provide a submission to Elexon. It should also give sufficient time for Elexon to audit the LLFs and resolve any audit issues before the end of the year. • Add requirement for Host LDSOs to provide Elexon with the network boundary LLFs by 30 September. • Add caveat that recalculation may be required if the Host LDSO LLFs used in the calculation need to be recalculated as a result of a non-compliance identified during the audit.
Justification for Change (mandatory by originator) This Change is needed to enable Embedded LDSOs to calculate and submit Site Specific LLFs in accordance with BSCP128.
To which section of the Code does the CP relate, and does the CP facilitate the current provisions of the Code? (mandatory by originator) Section K – Line Loss Factors The proposed CP does facilitate the current provisions on the Code.
Estimated Implementation Costs (mandatory by BSCCo) Less than £1k of effort to implement the necessary document changes.
BSC Configurable Items Affected by Proposed Solution(s) (mandatory by originator) BSCP128 'Production, Submission, Audit & Approval of Line Loss Factors'
Impact on Core Industry Documents or System Operator-Transmission Owner Code (mandatory by originator) None
Related Changes and/or BSC Releases (mandatory by BSCCo) None
Requested Implementation Date (mandatory by originator) November 2023 BSC Release
Reason: To enable implementation at the next earliest Release available, and to ensure the planned changes to the LLF submission process are public prior to the 30 September 2023 LLF submission deadline.
Version History (mandatory by BSCCo) V0.1

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Originator's Details:
BCA Name: Freya Gardner
Organisation: Elexon
Email Address: llfs@elexon.co.uk
Telephone Number: 02073804107
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Attachments: Draft redlined changes to BSCP128

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