

# Authority Led SCR Modification Consultation Responses

## P420 'Retail Code Consolidation Significant Code Review'



### Phase

Draft Report

Consultation

Final Report

Implementation

This Report Phase Consultation was issued on 17 May 2021 with responses invited by 17 June 2021.

### Consultation Respondents

Respondent	Role(s) Represented
Association of Meter Operators	Trade Body
Electricity North West Limited	Distributor
Northern Powergrid	Distributor
Scottish Power Energy Networks	Distributor
Scottish Power Energy Retail	Supplier, MOA, NHHDC, HHDC
Western Power Distribution	Distributor

## Question 1: Do you agree that the redlined changes to the BSC deliver the intent of P420?

### Summary

Yes	No	Neutral/No Comment	Other
3	2	0	1

### Responses

Respondent	Response	Rationale
Association of Meter Operators	No	I have highlighted where I believe the red lining needs further review or amendment to improve the intent.
Electricity North West Limited	Yes but some issues.	<p>The majority of the proposed redline drafting reflect the purpose of P420. We have identified a small number of issues which should be corrected.</p> <ul style="list-style-type: none"> <li>The Section X -1 definition of metering point text has been changed reflect the definition in the DNO licence, which points to Schedule 8 of the MRA. This section is due to be removed from the MRA and transferred to the MRA transition Schedule in the REC as part of the licence drafting. It is worth being aware that the two elements need to be co-ordinated.</li> <li>Section F includes the drafting for the cross code change package. Our concern relates to the use of "mutatis mutandis". Whilst appropriate in terms of legal drafting, ELEXON should avoid its use in other documents and should opt to use simple clear English rather than Latin.</li> <li>The BSCP40 (change management) schedule does not include any references or processes relating to the cross code change management process. This is an oversight and needs to be included to reflect the potential issues if a change is raised as a lead proposal or as a secondary change proposal as part of a co-ordinated code change.</li> </ul>
Northern Powergrid	Yes	
Scottish Power Energy Networks	Yes	Section H – (f) (iv) the reference to 'Settlement agreement for Scotland' has been removed in addition to the reference to the MRA – Do not believe this to be correct.

Respondent	Response	Rationale
		<p>Section K – Annexe K.1 ref to MRA Transition schedule – 1.1.4 &amp; 1.1.5 this references Barclays bank where the LDSO is located in England/Wales – no reference to Scotland</p> <p>Section W – Section 1.7 &amp; 5.4.1 references the MRA in terms of the Trading Disputes process – this should be removed</p>
Scottish Power Energy Retail	Yes	
Western Power Distribution	No	In principle we agree that the redlined changes to the BSC deliver the intent of P420 however a list of queries in respect of the red-lining has been detailed under "Red-lined Text"

Question 2: Do you agree with the Panel's initial view that P420 does impact the EBGL Article 18 terms and conditions related to balancing held within the BSC?

## Summary

Yes	No	Neutral/No Comment	Other
3	1	1	1

## Responses

Respondent	Response	Rationale
Association of Meter Operators	No comment	
Electricity North West Limited	Yes	This is a ESO issue
Northern Powergrid	Yes	
Scottish Power Energy Networks	No	SPEN agree that there is an impact on EBGL but agree that this is not major as the areas are not being removed from industry processes.
Scottish Power Energy Retail	Yes	Yes, agree with the initial view, as set out in the Modification Consultation document.
Western Power Distribution	Yes/No	We feel that we are not in a position to agree or disagree with the Panel's initial view that P420 impacts EBGL Article 18

Question 3: Do you have any comments on the impact of P420 on the EBGL objectives?

### Summary

Yes	No	Neutral/No Comment	Other
0	4	1	1

### Responses

Respondent	Response	Rationale
Association of Meter Operators	No comment	
Electricity North West Limited	No	
Northern Powergrid	No	
Scottish Power Energy Networks	No	
Scottish Power Energy Retail	No	
Western Power Distribution	Yes/No	We have no comments

## Question 4: Do you have any further comments on P420?

### Summary

Yes	No
4	2

### Responses

Respondent	Response	Rationale
Association of Meter Operators	Yes	<p>The future governance of the metering CoPs needs further consideration. As these are primarily obligations of Metering organisations their governance would be best placed in the REC.</p> <p>Similar consideration needs to be given to the Technical Assurance of Metering so that the full benefit of consolidating the TAA auditing and site visit together with the MOCOPA activities in the REC can be delivered.</p>
Electricity North West Limited	No	
Northern Powergrid	Yes	<p>We note the terminology for Market Message is not in line with REC:</p> <ul style="list-style-type: none"> <li>• BSC (Section F) 'Market message' = means a message containing Data Items intended to be sent under or in connection with an Energy Code.</li> <li>• REC Interpretation schedule 'Market Message' = means the same as Energy Market Message <ul style="list-style-type: none"> <li>o 'Energy Market Message' = means a structured communication sent between two market participant in the form and with the content required (and as otherwise specified) by the Data Specification</li> </ul> </li> </ul>
Scottish Power Energy Networks	No	
Scottish Power Energy Retail	Yes	<p>It would have been helpful if the finalised version of the new REC Metering Schedule had been available at the same time to allow a full, end to end comparison to take place, particularly when checking the BSCPs.</p> <p>We list minor comments and questions on the drafting below.</p>

Respondent	Response	Rationale
		<p>General - the drafting needs to be consistent and either use REC or Retail Energy Code</p> <p>General– need to be consistent and either say “Retail Energy Code Metering Operations Schedule for SVA Metering Systems”, “the Retail Energy Code Metering Operations Schedule”, “the Retail Energy Code Metering Operations Schedule 20” or “the relevant provisions of the REC” – it currently does both. Our preference is to be specific but recognise the Schedule name may change.</p> <p>General – need to be consistent in referencing level for REC – is it REC, REC MRA Transitional Schedule etc</p> <p>General – number of updated BSCPs have had the page numbers removed from the contents section.</p> <p>General – housekeeping changes were not always clearly signposted</p> <p>Section X – no marked changes, please confirm if there are any</p> <p>Section X-1 – Is Industry Code Manager correct for all codes? DCUSA is still a Code Administrator.</p> <p>Section W – no RCC changes but clause 1.7 is all about the MRA. Please confirm if it is correct to leave it as is.</p> <p>BSCP011 – Clause 1 and Clause 3.1 - why have the MRA references not been replaced with REC? Believe it is still relevant.</p> <p>BSCP27 – some changes have not been marked as MEM or RCC. Clause 1.20 – is a reference to REC required?</p> <p>BSCP128 – Example - Clause 3.5 – should DTC reference be replaced rather than deleted?</p> <p>BSCP501 – Acronyms – needs REC. Clause 3.2.1 – would expect footnote to remain and point to relevant area of REC or BSC. 4.22 – why has clause been deleted rather than replace by REC?</p> <p>BSCP502 – Contents footnote – MRA still there – is that correct?</p> <p>BSCP503 – acronym of DTC still there – is that correct?</p>

Respondent	Response	Rationale
		<p>BSCP504 – page 6 – footnote references MRA. Is that correct?</p> <p>BSCP504 – 3.2.6.35, .45 – reference to REC has moved up a level. Would recommend it continues to refer to the Schedule itself to avoid confusion.</p> <p>BSCP504 – 3.3.15.7, .8– DSBR – acronym needs to be explained</p> <p>BSCP510 – Acronym – need to add REC</p> <p>BSCP533 (Appendix B) – “The following flows can be found within the MRA Data Transfer Catalogue” should be The following flows can be found within the Energy Market Data Specification”</p> <p>SVA DC Volume 1 Intro v54.1 footnote page 11 – reference to DTC remains – is that correct?</p>
Western Power Distribution	Yes	See below details of queries in respect of the red-lining



Respondent	Location	Comment
Association of Meter Operators	L1.2.4 (a)	Not convinced this is clear. I do not see the need to have the SVA Meter Operator text in the BSC. Whether the BSC SVA MOP becomes a MEM is governance under the REC. This confuses the drafting
Association of Meter Operators	L2.1B	Not sure is the numbering is correct here. 2.1B.1 refers to para 2 & 3 and it is not clear which paragraphs this is referring too.  2.1B.2 is the control actually with the REC to determine an 'end date' for any applicants under the BSC. It is in no-ones interest to allow this to runs on indefinitely, so setting an end date of [March 2022] may make it clear to applicants.
Association of Meter Operators	K2.4.6	Not really clear why this paragraph exists. Is it constrained to SVA, it is constrained to NHH and puts an obligation of a SVA MOA which might be better placed commercially between the Supplier and the MAP.
Association of Meter Operators	L1.2.5	The drafting has introduced a "he is" might be better to use non gender term "they are". Not sure the comma after appointed is correct
Association of Meter Operators	L2.1	I think it would be appropriate to move the Metering CoPs in to the REC. The Metering CoPs lay out the equipment requirements which must be followed to design, fit and maintain metering equipment. The governance of these documents would sit better within the REC as the MEMs are governed by the REC. It will also allow MEMs to raise changes under the REC. MEMs (and Party Agents generally) are unable to raised changes under the BSC.
Association of Meter Operators	L3.3.2	The judgment of the MOA should be replaced with a MEM under the REC. The MEM is still best placed to determine good practice. This is a fundamental change, which this Mod is focused on transferring the obligations from the BSC to the REC, not for changing who makes decisions on good practice.
Association of Meter Operators	W1.3.1	Drafting put is brackets is not clear - should perhaps say 'data and/or processes required under the REC which has or potentially has an impact on the

Respondent	Location	Comment
		accuracy of Settlement'. To narrow the data to impacts on settlement?
Association of Meter Operators	X-1	CVA MOA – remove 'and' between 'test and maintain'.
Association of Meter Operators	X-1	Meter Operator Agent – is this used anywhere or have all references been changed to SVA & CVA MOA?
Association of Meter Operators	X-1	Qualified Person – does the exclusion for SVA MOA need to be stated, or is it already covered by the Qualification section J exclusions?
Association of Meter Operators	X-1	SVA MEM – this should be further constrained to electricity MEMs under the REC?
Association of Meter Operators	BSCP11	It would be sensible to allow the BSC to request information directly from the SVA Meter Operator to assist with the investigation and resolution of a Trading Dispute. The existing drafting in 5.1.3 refers to any relevant expert. Having something to explicitly include SVA Meter Operators may more clearly allow the BSC to ask SVA Meter Operators directly. Should have complementary corresponding obligation in the REC to require SVA MOA to respond to these requests. Also, should ensure the MOA gets to hear of the outcome of any dispute that they are involved with
Association of Meter Operators	BSCP27	Is the intention to make this part of the Technical Assurance transitional activity? If it is then that should be added into the document early on.  3.4.5 use of the REC Metering Schedule terminology need to be standardised - see comment on BSCP515
Association of Meter Operators	BSCP32	Definitions - I think Affected Parties should include CVA and SVA Meter Operators - this may be perceived as a change, but the split of the role into the REC makes it more relevant  Need to ensure that a MEM or MAP can apply for a generic Dispensation for certain equipment that may not meet the Metering CoP requirements. This has happened in the past. It may be that the Applicant definition is sufficiently broad to allow anyone but Meter Operators should be explicitly included.
Association of Meter Operators	BSCP502	3.3.1.2 et al has ref to SVA HH MOA - is it necessary, or can it be regarded as SVA MOA?

Respondent	Location	Comment
		3.3.2.2 does the same with SVA NHH MOA? If these remain they probably need including in the document in the definitions"
Association of Meter Operators	BSCP504	1.1 The reference to REC should simply state in accordance with REC, and remove the Metering Operations Schedule which constrains the scope.  3.3.1 same attempted use of SVA NHH MOA but cannot see use of SVA HH MOA - best avoided or clearly defined.  3.3.15.7 & 8 the addition of DSBR has happened, but not a MEM or RCC change - so should be included.
Association of Meter Operators	BSCP509	1.6.1 & 4.1 et al Used acronym of RECCo. I think elsewhere mostly used REC - as per the BSC definitions.  4.3.3 Not sure the footnote really works. Might be better with additional bullet, referring to SVA MOA which are qualified under REC.
Association of Meter Operators	BSC510	3.2.3 et al - Is it better to refer to the REC rather than the REC Metering Operations Schedule. It future proofs the BSCP is the REC schedules change name or depend on other aspects in the REC
Association of Meter Operators	BSC515	3.3.A et al same comment as BSCP510 use of REC or REC Metering Operations Schedule
Association of Meter Operators	BSCP533 Appendix A	5.16 et al uses SVA HH MOA - which probably could just be SVA MOA as the file is defined as =H (indicates HH data). The context already defines the NNH/NHH split
Association of Meter Operators	BSCP533 Appendix B	Use of HH & NHH SVA MOA and the reference to REC Metering Operations Schedule
Association of Meter Operators	BSP535	1.9 this should perhaps reference the Technical Assurance transitional period. There is currently no mention. Something similar to BSCP533 footnote "SVA MOAs will be subject to the requirements of this BSCP for the period of the "SVA MOA Performance Assurance Transition Period" detailed in Section Z 5.1.1A – 5.1.1C"
Association of Meter Operators	BSCP537	1.1 should it simply refer to the REC rather than the Qualification and Maintenance Schedule?
Association of Meter Operators	BSCP550	1.1 et al same comment as BSCP510

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Association of Meter Operators	BSCP601	As proposed mostly housekeeping changes, except the MOCOPA ref. Question is whether the process will become a REC controlled process alongside the Metering CoPs
Association of Meter Operators	PSL100	10.1.2 Not sure you can say the document does not apply to MEMs then drop in a footnote that says the SVA MOA will provide data. Not good governance. Possibly require the Supplier to ensure that they can obtain the data from the SVA MOA - leaving the BSC obligation on the Supplier.
Association of Meter Operators	SAD	The Supplier section has removed some interactions between Meter Operator and Supplier - are these picked up in the REC Supplier entry process?  18.1.7 has a reference to the MOCOPA under the REC - is this way of referencing the REC correct?
Association of Meter Operators	Profile Admin SD	Same as BSCP510 and references to RECCo rather than REC
Association of Meter Operators	CRA URS	"5.9 the existence of the MOA has simply been removed. This may be fine, but I am not sure whether this triggers any other actions or events. Might be worth just checking.  The changes to reactive definitions are housekeeping not MEM changes therefore beyond scope of this MOD
Association of Meter Operators	PARMS URS	Same as BSCP533 Appendix A comments
Association of Meter Operators	CoP2, 3, 4, 5, 6, 7, 10	The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – is it the Metering Schedule or the MOCOP?
Association of Meter Operators	CoP8, 9	The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – this one has been drafted differently to the others, not sure why?
Association of Meter Operators	CoP4	The only change is the reference to MOCOPA – while the intend is correct is the terminology correct – is it the Metering Schedule or the MOCOP? May also need to be some changes to processes defined in BSC like commissioning which should be transferred into the REC because much of CoP4 is actually defining a process. It is very different from the other CoPs which are equipment specifications.

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Western Power Distribution	Section F 1.6.2A	"Cross Code Steering Group" – does this need to be defined under 1.6.1B?
Western Power Distribution	Section F 1.6.2C	"REC Change Management Schedule" – does this need to be defined under 1.6.1B?
Western Power Distribution	Section F 1.6A.1	There are two sub-clause (e)
Western Power Distribution	Section F 1.6A.2 (a)	"Modification Procedures" – is this a defined term?
Western Power Distribution	Section F 1.6A.4	"Cross Code Steering Forum" – is this the same as "Cross Code Steering Group"? if not should it be defined under 1.6.1B?
Western Power Distribution	Section F 2.11.22	"Cross Code Change Package" – is this a defined term?
Western Power Distribution	Section J 2.1B.2	"Without prejudice to paragraph 2.1B.2" should this reference "2.1B.1"?
Western Power Distribution	BSCP68 3.2.1.32	Footnote 26 deleted "Requirement to reject an attempt to set Energisation Status to "de-energised" whilst any mandatory field is blank is not in the NETA validation rules but is an MRA requirement" – if this is no longer an MRA requirement has this been picked up under the REC and if so should the footnote be retained and amended to reference the REC?
Western Power Distribution	BSCP501 1.11	"MPAS" has been deleted from the defined terms, however, MPAS as a defined term is still in existence within the REC or does this need to change to ERDS (Electricity Registration Data Service) again a defined term in the REC and be included within this BSCP501 "Defined Terms"?  Within this BSCP 501 there are still references to "MPAS" under 3.3.5; 3.4.4; 3.5.4 and 3.7.4
Western Power Distribution	BSCP501 4.2.2	"This section considers erroneous Registrations which are agreed by both Suppliers as being made in error." Where there is a dispute the Suppliers may either use the MRA REC disputes process, or seek redress through legal proceedings

Respondent	Location	Comment
		Should this deleted text be replaced by referencing the disputes process for erroneous transfers under the REC?
Western Power Distribution	BSCP510 4.5	<p>"SMRA Report of MSIDs registered by Supplier"</p> <p>"The report provided by the SMRA shall contain the following data items" definitions of which can be found under the MRA</p> <p>Should the deleted text not be replaced with reference to the REC?</p>
Western Power Distribution	BSCP513 1.1	<p>"For the avoidance of doubt, appointment of SVA Meter Operator Agents is not <b>as</b> in scope for this BSCP as these appointments will take place in accordance with the Retail Energy Code Metering Operations Schedule"</p> <p>Suggest remove "as"</p>
Western Power Distribution	BSCP535 1.8	The Acronym "SVA MOA" has been added, however, within BSCP533 the definitions that have been added are "SVA HHMOA" and "SVA NHHMOA" - should there not be consistency within the definitions?
Western Power Distribution	BSCP 550	Footnotes 3 and 4 have been removed. These footnote refer to definitions of Import and Export within the BSC SVA Data Catalogue, therefore unclear why these footnotes have been removed?