

Approval of P375 Configurable Item changes for the June 2022 BSC Release

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Owner/author	Craig Murray	Purpose of paper	Decision
Classification	Public	Document version	1.0
Summary	This paper invites the BSC Panel to approve the changes to BSC Configurable Items and new/amended data flows for P375 as part of the June 2022 BSC Release		

1. Changes to BSC Configurable Items required for the June 2022 BSC Release

- 1.1 This paper invites the BSC Panel to approve changes to Category 1 BSC Configurable Items and new/amended data flows for [P375 'Settlement of Secondary BM Units using metering behind the site Boundary Point'](#), which Ofgem approved on 24 February 2021 for implementation on 30 June 2022 as part of the June 2022 Standard BSC Release.
- 1.2 P375 will allow the use of Metering Equipment behind the defined Boundary Point ('behind the Meter') for Balancing Services, for Settlement purposes rather than the Boundary Point Meter. This will allow balancing-related services on-site to be separated from imbalance-related activities, more accurately reflecting the balancing-energy volumes provided by the Balancing Service Provider (BSP). A full description of the P375 solution can be found in the P375 Final Modification Report and P375 Business Requirements, available on the [P375 webpage](#).
- 1.3 The changes to [BSCP602 'SVA Metering System Register'](#) set out the new processes by which AMVLPs may:
 - Register Assets, AMVLP Agents and related Asset Metering Systems;
 - Receive AMSID Pairs generated by SVAA; and
 - Allocate AMSID Pairs to Secondary BM Units.
- 1.4 The changes to [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) set out the new processes for Half Hourly Data Collectors.
- 1.5 The changes to [BSCP514 'SVA Meter Operations for Metering Systems Registered in SMRS'](#) set out the new processes and data estimation techniques for Meter Operator Agents.
- 1.6 The changes to [SVA Data Catalogue Volume 1 'Data Interfaces'](#) set out all new and amended data flows for P375 and the changes to [SVA Data Catalogue Volume 2 'Data Items'](#) set out all new data items used by the new and amended data flows, except for those included in the new 'Dxxxx' data flow, which will be captured in the REC's Energy Market Architecture Repository (EMAR).
- 1.7 Please note that the SVAA User Requirement Specification and SVAA Service Description changes for P375 will be issued to the SVG for approval following industry review in Q2 2022.

2. Industry Review

- 2.1 We published the BSC Configurable items for industry review between 5 July 2021 and 2 August 2021.
- 2.2 We received four responses from industry participants representing a Supplier and Supplier Agents, including Half Hourly Data Collectors, Half Hourly Data Aggregators and Half Hourly Meter Operators. Two respondents

provided comment which explicitly supported the use of the short code “77” for use in the newly introduced Asset Metering System Identifiers (AMSIDs). Further context on this can be found in section 8.3.4 of the cover letter for the industry review (Attachment C)

- 2.3 We extended the deadline for industry review until 16 August, but received no further comments.
- 2.4 The actions taken/amendments made in regards to the comments received are detailed in Appendix 1.

3. BSC Configurable Items for approval

- 3.1 The draft redlining can be found in Attachment A of this paper.
- 3.2 Table 1 below lists the documents amended by P375 requiring approval as part of this paper:

BSC CI(s)
BSCP01 - ‘Overview of Trading Arrangements’
BSCP15 – ‘BM Unit Registration’
BSCP27 - ‘Technical Assurance of Half Hourly Metering Systems for Settlement Purposes’
BSCP32 – ‘Metering Dispensations’
BSCP38 – ‘Authorisations’
BSCP503 – ‘Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS’
BSCP507 – ‘Supplier Volume Allocation Standing Data Charges’
BSCP508 – ‘Supplier Volume Allocation Agent’
BSCP537 – ‘Qualification Process for SVA Parties, SVA Party Agents, AMVLP Agents and CVA Meter Operators’
BSCP602 – ‘SVA Metering System and Asset Metering Systems Register’
Self-Assessment Document (SAD)
SVA Data Catalogue Volume 1 – Data Interfaces
SVA Data Catalogue Volume 2 – Data Items

4. Impact of Retail Energy Code implementation on P375

- 4.1 The Retail Energy Code (REC) will go live on 1 September 2021. The entirety of BSCP514 – and parts of other procedures and obligations currently under the BSC – will be transferred to the REC at that point. As [Modification P420 ‘Retail Consolidation Significant Code Review’](#) was raised on 10 May 2021 to move Meter Operations (relating to Boundary Point Metering – but not Asset Metering) out of the BSC and to decommission BSCP514, it will not be possible to implement some of the approved P375 legal text as it stands, and it will not be possible to implement the new Asset Metering MOA processes for P375 in BSCP514, as the document will no longer exist.
- 4.2 We will raise a Modification in November 2021 to re-baseline the P375 legal text so it can be implemented on the post-P420 BSC.
- 4.3 **Due to the impacts of REC implementation the changes to BSCP502 and BSCP514 are not being presented for approval.** Instead they are being presented for **information only**, and Elexon will draft a new BSCP to incorporate the P375-related changes to BSCP514 (BSCPXXX – name to be determined). Elexon proposes that this BSCP will also incorporate the P375-related changes to BSCP502 as the new Asset Metering processes for BSC Party Agents for P375 are shared between BSCP502 and BSCP514. This new BSCP would not change any of the new processes created for P375 as described in the amended versions of BSCP514 and BSCP502.
- 4.4 The new BSCP will be drafted and sent out for formal industry review in September, and we expect this document to be presented to the Panel for its approval in October 2021 under P375 governance.

5. Change process for new and amended “DTC” Data Flows and Data Items required for P375

- 5.1 When the Retail Energy Code (REC) went live on 1 September 2021, the DTC was replaced by the Energy Market Architecture Repository (EMAR) and a new REC change process for the EMAR was introduced (that is different to the MRASCo process for DTC changes). At a high level, the REC change process is:
- 5.1.1 EMAR will be comprised of ‘Market Messages’, instead of the Data Flows described in the DTC, and ‘Data Items’;
- 5.1.2 Each Market Message will have an owner (e.g. REC or BSC, among other Code Bodies);
- 5.1.3 For new or amended BSC-owned Market Messages, the changes should be approved under BSC Processes and logged via the REC Portal for implementation;
- 5.1.4 For new or amended non BSC-owned Market Messages, the proposed changes should be recommended by the relevant BSC committee (the Panel or Panel Committee(s), and an EMAR Change Proposal logged via the REC Portal;
- 5.1.5 The Cross Code Steering Group will consider the EMAR Change Proposal and make a decision on whether the Change Proposal should be approved for implementation in the EMAR and on whether the proposed implementation date is acceptable.
- 5.2 There is one new BSC-owned Market Message (labelled “Dxxxx” until the formal Message Number is assigned under REC governance) and new instances of 20 existing Market Messages, two of which are BSC-owned, required for the solution to P375.
- 5.3 The new Market Message and 19 of the 20 new instances of existing Market Messages were included in the documentation issued for industry review.
- 5.4 One new instance of an existing Market Message (“D0302 Notification of Customer Details”) required amendment as the result of a comment received in the industry review. Please refer to Section 2.2.18 of Attachment B for details.
- 5.5 Attachment B includes the details all of the new and amended Market Messages and the new and amended Data Items required for the new BSC-owned Market Message.

6. Recommendations

- 6.1 We invite the Panel to:
- a) **APPROVE** the amendments to the documents listed in Table 1, as detailed in Attachment A (with the exception of BSCP502 and BSCP514), to be implemented on 30 June as part of the June 2022 BSC Release.
- b) **APPROVE as “BSC owned data flows” for implementation in the EMAR:**
- the new ‘Dxxxx’ data flow; and
 - the new instances of the D0383 and D0384 data flows;
- for implementation in the June 2022 Release of the EMAR.
- c) **RECOMMEND the new instances of “REC owned data flows” for implementation in the EMAR:**
- D0001, D0002, D0005, D0008, D0010, D0011, D0022, D0134, D0139, D0142, D0148, D0151, D0155, D0170, D0221, D0261, D0268 and D0302;
- for approval by the CCSG for implementation in the June 2022 Release of the EMAR.

Attachments

Attachment A – P375 Configurable Items

Attachment B – New and Amended Market Messages and Data Items for implementation in the EMAR

Attachment C – P375 ‘Settlement of Secondary BM Units using metering behind the site Boundary Point’ – Industry Review of Configurable Items

For more information, please contact:

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Appendix 1 – P375 – Settlement of Secondary BM Units using metering behind the site Boundary Point

7. Summary of actions taken in regards to P375 CI industry review

BSCP01 – Overview of Trading Arrangements			
Respondent	Location	Comment	Response
Siemens	1.6.1	AMVLPs are not described in this section as all other Parties and Agents are. I suggest a paragraph on AMVLPs.	Updated accordingly
BSCP15 – BM Unit Registration			
Respondent	Location	Comment	Response
IMServ	Front Cover	This quotes a date of 27/02/20, is this correct? Page 2, bullet point 3 has no date quoted. Should all these CSDs not be aligned to June 2022?	Implementation date and version numbers are completed during the implementation of document changes.
BSCP32 – Metering Dispensations			
Respondent	Location	Comment	Response
IMServ	2.2	We suggest it would be worth including 'Asset Metering System' and 'Asset Metering Equipment'? or pointing to a document where these terms are defined?	No action taken - terms are defined in BSC Section X, Annex X-1
BSCP38 - Authorisations			
Respondent	Location	Comment	Response
IMServ	Front cover	Effective date needs tidying up	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	Page 9	Has 'VLP' been deleted in error?	It was deleted in error – this has been amended

BSCP502 – Overview of Trading Arrangements

Respondent	Location	Comment	Response
IMServ	Entire document	<p>We think the entire document is a considerable improvement over the previous draft and is significantly easier to follow. The new Section 2 is particularly welcome.</p> <p>However, the areas of responsibility between AMHHDC and HHDC remain unclear in a number of areas.</p>	Concerns around the lack of clarity between the areas of responsibility between the AMHHDC and HHDC are addressed through the comments below
IMServ	Contents Page	The table of contents has not been updated to reflect the changes to Section 2	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	Section 1	We don't believe this to be a mandatory service that HHDCs or AMHHDC must provide, is this correct? If so please could this be clearly stated in Section 1 rather than being just an implicit fact based on being able to send a D261.	That is correct, this is not a mandatory service. This will be clarified upon transposition to the new BSCP

IMServ	2.1.1.1	<p>This appointment process relies on the D148 to prevent the HHDC attempting to collect data when an AMHHDC is in play – until the D148 arrives the HHDC will have an appointment and may have a D268 so may attempt collection. It would be significantly more robust to introduce a new Retrieval Method that would prevent this, such as is used for Half Hourly Elective where the Supplier is sourcing the data.</p> <p>We note that a D155 is sent from AMVLP to HHDC and a Pttt is sent to the AMHHDC (if applicable)?</p> <p>Can an Agent be appointed as both AMHHDC and HHDC, we would guess not? We assume that if a D155 and a Pttt is received by the same Agent, the Pttt should be rejected if possible?</p>	<ol style="list-style-type: none"> 1. HHDCs should not have a D0268 at that stage 2. HHDC would get the Pttt if one was being used to notify them of the appointment of the relevant AMHHDC 3. Same Agent can't be appointed. The D0155 will appoint the HHDC, the Pttt notifies the HHDC that an AMHHDC has been appointed
IMServ	2.1.1.4	What role codes will be used for AMMOA and AMHHDC? We note Pttt notifies of AMHHDC but not AMMOA?	AMMOA or AMHHDC won't have separate role codes. AMVLP will do in MDD (reserved 7 in MDD). Confirmed in D0155.
IMServ	2.2.5.1	We note that where a feeder is energised both HHDC and AMHHDC (where applicable) are notified but that isn't the case where a feeder is de-energised, could this be aligned.	Updated accordingly
IMServ	2.3.1.12	Where the data flow is valid, how does the HHDC inform the SVAA? Resending the same Dxxxx files doesn't seem very sensible, what is intended therefore?	Updated to flag to BSCCo via BSC Service Desk call

<p>IMServ</p>	<p>2.3.2.3 , 2.3.2.13 and 2.3.2.14</p>	<p>2.3.2.3 Places an obligation on the AMHHDC to send data to the HHDC by 2WD before the next VAR.</p> <p>2.3.2.13 places an obligation on the HHDC to submit data to SVAA 'Prior to next Volume Allocation Run',</p> <p>However under 2.3.2.14, SVAA is notifying the HHDC of missing data at 2WD before the VAR.</p> <p>This means the HHDC does not have enough time to process the Dxxxx from the AMHHDC, validate, estimate and report the data by the deadline. Please re-consider the timings here.</p>	<p>Updated to 3WD</p>
<p>IMServ</p>	<p>2.3.3</p>	<p>The process for raising a fault by an AMHHDC seems particularly cumbersome. It reads as follows:</p> <p>AMHHDC detects inconsistency under 2.3.3.1 and sends Pyyyy to AMVLP</p> <p>AMVLP sends D0001 to AMHHDC under 2.3.3.2</p> <p>AMHHDC sends D0001 to AMHHMO or HHMO under 2.3.4</p> <p>We guess in reality that if an AMHHDC detects an issue they would jump straight to 2.3.4. Therefore adding a link from step 2.3.2.2 to 2.3.4 would seem appropriate.</p>	<p>This is the same as the equivalent SVA process in BSCP502 3.4.2, therefore remains unchanged for consistency</p>

<p>IMServ</p>	<p>Section 2 and 4</p>	<p>We have significant misgivings over splitting the Validation and Estimation activities between AMHHDC and HHDC where an AMHHDC is in play. We feel this will result in poorer quality estimates being submitted and/or significant manual effort being required to calculate such an estimate in areas such as:</p> <ol style="list-style-type: none"> 1. Where a check meter is available 2. Where a meter advance is available 3. Where a single value or 2-3 values need to be estimated 4. Where data could be scaled (perhaps due to phase failure) <p>Our preference and one that we feel gives the best quality of data is that a single party performs both the validation and estimation. Where an AMHHDC is in play, the AMHHDC is best placed to perform this activity.</p> <p>The splitting of this activity is also inconsistent with current BSCP502 section 3.4.6.5 which allows a none HHDC role (i.e. a Supplier) to estimate data and send this to the HHDC.</p> <p>Under the proposed changes 2.3.2.4 is a pointless activity, if the meter advance validation check is successfully performed by the AMHHDC, then the HHDC duplicating the validation is unnecessary, if the validation check fails, the AMHHDC doesn't send the data to the HHDC? Further details around</p>	<p>Amendments made to SAD Section 9 and 9A to allow AMHHDC to validate/estimate data</p>
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		the practical difficulties on performing this validation is covered by our comments on 4.8A	
IMServ	4.3.4	If only the HHDC is performing estimation then the set of allowed values in 4.3.4 doesn't apply to AMHHDCs?	Updated to allow AMHHDC to estimate
IMServ	4.1A.6	How is the HHDC (or AMHHDC if applicable) get informed of the 'CoP11 Asset Metering Type'?	AMVLP to send Pgggg (P0303) to HHDC when available - it has Asset Metering Type - updated BSCP514 and BSCP502
IMServ	4.8A	How does the HHDC perform Meter Advance Reconciliation on Asset Metering Systems where a AMHHDC is retrieving data, the D0010 register readings will not align to the Dxxxx (the time in the D0010 will be when the register read was collected while the Dxxxx is a set of 48 readings ending at midnight?). We are not sure why 4.8A states "This activity is performed by the HHDC", wouldn't the AMHHDC be better placed to do this?	Updated to allow AMHHDC to do this
Siemens	1.1	There is no need for the second paragraph as it simply repeats the first paragraph. Alternatively, remove reference to the AMVLP in the first paragraph and state that the BSCP has 2 purposes and use the 1 st paragraph for the (HH) SVA Metering Equipment and the 2 nd paragraph for Asset Metering Equipment.	Updated accordingly
Siemens	1.1	3 rd paragraph – "SVA Metering Systems..." – the opening sentence is missing context, i.e. "SVA Metering Systems... are"	Updated accordingly
Siemens	1.1	10 th paragraph – "This BSC Procedure also focuses..."	Updated accordingly

Siemens	1.2 and elsewhere	Is it necessary to use the defined term “Associated”? In other places in the BSCP this is not a defined term (footnotes 4 and 7, for example). If it is required to be a defined term then where is it defined?	Correct, not a defined term. Updated throughout with lowercase ‘a’
Siemens	1.2	16 th paragraph – is it necessary to state that records should be retained for the period they are appointed “with the SVAA”? This is different from the D0209 HHDA registration given that the AMHHDC or HHDC will only recognise an appointment if it has received a D0155 responded to with a D0011. If the DC is not provided with a D0155 but is registered as appointed by the SVAA, the DC would not be in a position to retain data or support the Trading Disputes process. This should be acknowledged	This is the same as the SVA wording in the fifteenth paragraph for the HHDC and SMRS, no update made to maintain consistency
Siemens	1.2 and elsewhere	I was surprised to see that AMHHDCs are unaffected by a Demand Control Event when this may have an impact on the AMVLP’s physical notification. Can it be confirmed that this is correct and, if so, why?	This is correct, no update made as irrelevant to P375
Siemens	1.3	Final paragraph – I’m not sure the term “where it is not possible” is correct. Should it say “where agreed between the relevant parties or where it is not possible” and the rest of the paragraph adjusted accordingly? I understand that this might be referring to flows from/to the AMHHDC which I comment later is missing from the Dxxxx flow (erroneously, I thought). But as it is a generic statement it suggests that if it is possible then the DTN must be used which I don’t believe is the case for any parties if they agree otherwise.	Updated accordingly

Siemens	1.6.2	The inclusion of definitions for AMHHDC and AMMO I think is necessary as it doesn't exist in the BSC. Should there also be a definition given for the AMVLP as that, too, is not BSC defined?	Added definition in BSCP502 and BSCP514
Siemens	2.1.2.1 and elsewhere	The Pttt Notification of AMHHDC should occur after the New AMHHDC agrees terms. Would it not be better to place this step after the D0011 agreement anyway rather than put in the note in S2.1.2.1?	The notification of HHDC and AMHHDC happens at the same time so that HHDC is aware that an AMHHDC has also been appointed. Process needs to be run concurrently – no updates made
Siemens	2.1.3.15 and elsewhere	The proposed amendments to the DTN does not allow for a HHDC to HHDC exchange for the D0005	Updated accordingly

BSCP503 – Overview of Trading Arrangements

Respondent	Location	Comment	Response
IMServ	3.4.2.3C	Should this step also reference the P0034 to align with BSCP508?	The P0034 has been retained in BSCP508 for NHHDA's, whereas the P0310 is for HHDA's and HHDC's. Rearranged BSCP508 so that "NHHDC" aligns with "P0034".

BSCP507 – Supplier Volume Allocation Standing Data Charges

Respondent	Location	Comment	Response
IMServ	Front cover	Effective date needs adding	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	This pro-forma	Think there is a typo on this pro-forma and 'Charges' should be 'Changes' in the phrase 'Supplier Volume Allocation Standing Data Charges' above?	Correct – amended accordingly
IMServ	Versioning	We assume 17.6 is an interim draft version sequence number, hence the gap from the previous version and this will be issued as V18?	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	3.6.3	Please could you explain the reasoning behind changing the term 'VLP' to 'Lead party'?	"Lead Party" is the generic term used in BSCP602 for any Party that can register MSID Pairs in the 'SVA Metering System Register'. However, it isn't useful to use this tem in BSCP508, so "VLP, AMVLP or NETSO" have been used instead.
IMServ	3.6.14	What is the logic for the removal of this section?	Deleted mistakenly and reinstated

BSCP508 – Supplier Volume Allocation Agent

Respondent	Location	Comment	Response
IMServ	Front cover	Versioning again, same comment as above, why does the version jump from V32 to 32.9? Will the published version be v33?	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	Front cover	Effective date is not stated, we assume this to be June 2022?	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	Page 9	Lead Party defined here but not in 507, is this intended?	Updated - "Lead Party" now replaced by "VLP, AMVLP and NETSO" so aligns with BSCP507 now.
IMServ	1.3	We assume that data from HHDCs will be in kWh?	Correct – no changes made
IMServ	3.3.1	Does this place new obligations on the HHDA, don't see anything in 503?	Unfortunately, existing 3.3.1 text is showing as redlined, but only the obligation to send the Dxxxx to SVAA should be redlined. 'Accepted' the changes so the text on sending the D0040 and D0298 is not shown as a change
IMServ	3.A vii	HHDC files are incremental not whole sets	Amended to say "The HHDC file only contains data for Asset Metering System Number(s) to which the HHDC has been appointed and contains data for every Settlement Period in each Settlement Date included in the file".

BSCP514 – SVA Meter Operations for Metering Systems Registered in SMRS and Asset Metering Systems Registered with the SVAA

Respondent	Location	Comment	Response
IMServ	N/A – clarification requested	Is this a mandatory service that MOAs must offer? If it isn't please can this be clearly stated in Section 1	Correct, not mandatory. This will be clarified when transposed to the new BSCP
IMServ	N/A – clarification requested	Will new role codes be created for the AMVLP, AMMOP and AMHHDC roles?	AMMOA or AMHHDC won't have separate role codes. AMVLP will do in MDD (reserved 7 in MDD). Confirmed in D0155.
IMServ	N/A – clarification requested	If new recipients are being added to the x19 DTN flows listed, does this mean the flow version will be advanced? If the flow version is to be advanced agents may need systems changes to validate old vs. new version, this change would affect all parties, even those who are not involved with P375. Our preference is not to advance flow version when there is no material change to the flow structure.	Not planning on changing flow version as not material change to flow structures, just creating new instances where they may be used
IMServ	N/A – clarification requested	Under what circumstances would a MOP need to send a D0005 to the AMVLP? There is no reference to this in BDCP514?	To 'Notify that the fault remains unresolved' in the now updated 4.3.1; instance has been added
IMServ	N/A – clarification requested	Why can't a MOP send a D0011 to the AMVLP, we believe the MOP to AMVPL section been omitted from the D0011 in the SVA catalogue?	It is in BSCP514 - The 'MOA to AMVLP' instance of the D0011 is in the SVA Data Catalogue Vol 1 Appendix A.
IMServ	N/A – clarification requested	Currently only MOPs and DNOs sent D0383s, will the AMVLP hold and send D0383 information to other parties?	The AMVLP will only send D0383 (or equivalent method that they'll have to use) where they have the information for an existing Metering System that they wish to use as an Asset Metering System. They would be expected to store the information where they receive it.

IMServ	N/A – clarification requested	How will the AMVLP manage customer contact information, the D0302 is not included in the list of flows, will the AMVLP be using a different method to pass site contact information?	Added use of D0302 in BSCP514 and BSCP502
IMServ	N/A – clarification requested	How will the AMVLP manage address related information as the D0131 is not included in the list of flows? Will the AMVLP be using a different method? <i>Note: Address/meter location could be important for boundary metering as the location is not always easily identifiable i.e. it's not installed on the main incoming supply next to the cut-out, it could be anywhere on the premises</i>	Initially via D0155. D0131 isn't used in BSCP502 and BSCP514 for SVA. As an Asset Meter can only be Registered behind an already Registered Half Hourly Metering System changes of address details not anticipated to be an issue.
IMServ	N/A – clarification requested	The business requirements documents talks about the possibility that Asset metering could be used for an ever increasing number of sites, for example EV charging units. P flows are ok for hundreds or maybe a few thousand sites, but they are not going to be practical for significant volumes	Asset Meters must be installed behind a Half Hourly Metering System. This will limit volumes until MHHS rolled out. We have asked VLPs expected volumes and they have indicated around ~10 to 20k. The smaller EV type arrangements are more likely to be Asset Metering Type 5 and be AMMOA appointed.
IMServ	N/A – clarification requested	Will the AMVLP and appointed MOA/AMMOA record and recommunicate (on churn) the Asset Meter Types described in CoP11 (i.e. 1, 2, 3, 4 & 5)? It's likely this information useful to the MOA who may need to manage and maintain these meters (i.e. proving test timescales), will this be clear from the Outstation Type, or other values in the D0268?	Would be up to AMVLP and agents to manage using the Outstation Type code – no changes made
IMServ	N/A – clarification requested	For HH Settlement MPANs the MOA receives a D0289 from the Supplier advising what the Measurement Class i.e. C, D, E, F or G, will Asset Meters be assigned a Measurement Class?	Measurement Class Id is in the P0297 (formerly Paaaa) 'Asset Registration'. Not being sent to MOA

IMServ	N/A – clarification requested	Will asset meters be leased by Meter Asset Providers (i.e. Role code 8), if asset meters belong to a MAP then how will this process be managed, are D0303/D0304 flows required?	Wouldn't expect a MAP to be used. Would imagine in this arrangement AMVLP would effectively be the MAP and would qualify as an AMMOA.
IMServ	4.1.1.6	Why is 'D0155 Notification of Meter Operator or Data Collector Appointment and Terms' included here, doesn't seem quite right.	Amended to remove reference to D0155
IMServ	4.1.2.6	(Asset meter new connection). This is saying that it mandatory for a MOA to request site technical details from AMVLP, we believe this that should be an optional step rather than BSCP mandatory. It should be up-to the MOA to decide if they do or do not require this information, please make this step optional.	The equivalent for SVA is 5.2.2.6 where Optional for Supplier-serviced Metering Systems. Amended to optional as MOA may not require the information to install the metering as already familiar with the configuration and to have this as a mandatory step would create an inefficient administration process.
IMServ	4.1.3	We believe there maybe aspect to commissioning an Asset Meter which may be different to traditional settlement metering, for example the 'Equipment Owner' won't be the LDSO, more likely it will be owned by the customer, possibly it could have been installed by a MOP or the customers electrician many years ago so commissioning records may not be available. The physical equipment might be different to the 'norm' and certainly the physical location will be different, in some cases significant lengths of cabining could be used. Considering the differences we think it might be sensible to review the process for asset meters to ensure its fit for purpose. We don't want to be in a situation years from now where Asset Meters remain uncommissioned because records are missing/unavailable, the process needs to consider what is achievable in a real world scenario.	This is for a new Asset Metering System so will be a brand new installation and is the process for commissioning. The issues listed are more likely to occur in the 4.1.4 process where it can go back to 4.1.3, in this case if the Asset Metering System cannot be recommissioned it should be used. Guidance document will clarify options available to demonstrate commissioning for older equipment.

<p>IMServ</p>	<p>4.1.3.2</p>	<p>This states that the 'equipment owner' will send a D0383 to the MOA and AMVLP, are we expecting that the equipment owner for asset metering will generally be an industry party who had the ability to send DTN flows? Given that the equipment is installed separate to DNO activities we would expect that a lot of the equipment will be owned by the end user, it could be difficult to ensure correct/complete commissioning information is made available to the MOA.</p>	<p>The Equipment Owner won't usually be a DTN user, so they can use any mechanism agreed with the AMVLP, as long as they send the info required by the D0383 structure in the DTC. The instance of the D0383 in the SVA DC hadn't been included but has been added now.</p>
<p>IMServ</p>	<p>4.1.4</p>	<p>What happens should a Boundary Meter become an Asset Meter, for example where a supply is upgraded, this section seems to disallow this?</p>	<p>Boundary Meter can't be an Asset Meter. It would fall under P344 to use an SVA Metering System to participate in BM. If Boundary Point upgraded (e.g. LV to HV) the existing LV Meter would be disconnected as an MPAN and if site configuration allow be Registered with an AMSID to be used as an Asset Meter. Process allows for it.</p>

IMServ	4.1.4	<p>Using an Existing Metering System as an Asset Metering System</p> <p>The redlining is a copy of the existing Settlement process, however in this case asset metering is different and a different processes could be considered, for example:</p> <p>The AMVLP sends the MOA a D0142 (4.1.4.5) and then the MOA sends the AMVLP a D0170 (4.1.4.6) asking for the Puuuu (Metering System Related Details), this request could be rejected (i.e. Pyyyy), but hopefully the AMVLP will be able to send the MOP Puuuu.</p> <p>This process seems elongated for no particular reason, if the AMVLP is sending the D0142 we can assume the AMVLP has the necessary Puuuu info, so why would the MOA need to send the D0170 asking for it? Could the AMPLP simply send the Puuuu alongside the D0142?</p>	Amended accordingly
IMServ	4.1.4.4	<p>This suggests that the AMVLP will send the MOA a D0148, but it also mentions: 'Ptttt Notification of AMHHDC', is this suggesting that a regular MOA will get a D0148 and the AMMOA will get a 'Ptttt'? Will the AMHHDC appointment details be contained in the D0148?</p> <p>The MOA needs to know if they are receiving a D0148 or a 'Ptttt', it can't be both. (This is repeated in other sections).</p>	The Ptttt is sent to notify the MOA that an AMHHDC has been appointed. This is needed as there will always be a HHDC appointed and the details of this are in the D0148. If there is an AMHHDC the MOA will receive both the D0148 and a Ptttt

IMServ	4.1.4.5	<p>Under the Section 'Using an Existing Metering System as an Asset Metering System'</p> <p>Is the AMVLP really sending a D268 to the AMMOA/MOA?</p>	<p>Yes if they have the information available, will be the equivalent method unless AMVLP is also a Supplier. If they are using an existing Asset Metering System the obligation has been put on the AMVLP as they will either be already using the metering in another scheme and have the required details or the customer will and they can get this information from the customer</p>
IMServ	4.1.4.5	<p>This is saying the AMVLP is requesting information from the MOA, what is actually happening here? Is the AMVLP sending the D0142, D0268 & D0383, it doesn't make sense as 4.1.4.6 is then asking the MOP to send a D0170 to the AMVLP, its the D0170 requesting the equivalent of the D0215? If so why is it necessary, could the AMVLP send this as part of step 4.1.4.5?</p>	<p>Agreed and updated to send Puuuu as part of 4.1.4.5 and removed 4.1.4.6</p>
IMServ	4.1.4.10	<p>Is the MOA expected to send both the D0384 and the Pxxxx, BSCP514 says 'the reasons for non-compliance must be detailed.' Will the D0384 alone sufficient?</p>	<p>Would want both to be sent to give additional details about what was found and the configuration of the Asset Metering Equipment at the site – no updates made</p>
IMServ	4.2.1 and 4.2.2	<p>Energise/De energise</p> <p>Remote disconnect meters are common place in W/C CoP10 hardware and they are often used to switch-off the supply for non-paying customers. Does this type of metering have a purpose in Asset Metering i.e. removing the customer's generation capability from the grid?</p> <p>If an Asset Meter was remotely disconnected would the energisation status be energised or de-energised?</p>	<ol style="list-style-type: none"> 1. Not applicable to Asset Metering even if the meter has the functionality to do so – no changes made 2. Would align with SVA equivalent and be considered energised if Asset Meter remotely disconnected

IMServ	4.2.5 and 4.2.6	<p>(Change of Feeder Status), is 'feeder' appropriate terminology for an Asset Meter? Isn't the feeder supplying power to the cut-out on the settlement meter?</p> <p>Could an asset Meter AMMISD have more than one 'feeder', for example could the MPAN have more than one meter registered i.e. one Asset Meter connected to an EV and another Asset Meter connect to Solar panels, if so would these connection be classed as 'feeders'?</p> <p>*** If a customer had EV and Solar they might want to use different Suppliers, does this work?</p> <p>Another thing to consider is the impact of an energisation change on the Settlement Meter/MPAN, if the settlement MPAN is de-energised then power will be cut from the Asset Meter. When this happens the AMVLP/AMMOP/AMHHDC won't know this has happened, the asset meter MTDs won't be updated to reflect the over-all site status, this issue may result in unnecessary D0001s on the Asset Meter as the comms will fail.</p>	<ol style="list-style-type: none"> 1. Changed to Asset Feeder Status - updated in BSCP514 and BSCP502 2. An AMSID can be made up with more than one Asset Meter. 3. An AMSID has to be with a single AMVLP 4. Was discussed in P375 workgroup, more from the point of view of Prepayment customers, that the risk of supply at Boundary Point not being available is a risk to the AMVLP. D0001 process may be the only way that AMVLP would find out.
IMServ	4.2.5.4	<p>How is an Asset Meter register reading requested? Shouldn't the default be to read the register where available?</p>	<p>Same as SVA process but will amend to remove requested. Also updated From/To as was wrong way around. Merged with next step as duplication of process with different recipient.</p>

<p>IMServ</p>	<p>4.3.1</p>	<p>Asset Metering System Investigation Process. The red line text includes several process steps which are not standard in the HH Settlement metering process, for example:</p> <p>4.3.1.6 - Send notification of expected resolution date and where appropriate any request for support needed to resolve the fault from either AMVLP or HHDC/AMHHDC.</p> <p>4.3.1.7 - If AMVLP challenging Expected Action Date provided by MOA/ Request an altered action date</p> <p>By altering the existing process it means that any existing systems MOA's & HHDCs have in place for managing D0001s will need to be altered to deal with Asset meter faults, considering the anticipated initial volumes for Asset meters I don't believe this will be economical, we would recommend that BSCP514 aligns the AM process with the existing process.</p>	<p>Amended to align with existing BSCP514 SVA equivalent faults process.</p>
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BSCP537 – Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators

Respondent	Location	Comment	Response
IMServ	Front cover	Does not mention VLPs or AMVLPs – is this because they are covered under the description of SVA Party? I wondered if they might also operate in CVA?	AMVLP included in title of BSCP
IMServ	Process matrix 2.1.19 Footnote 9	This states “A Supplier/LDSO does not have to be Qualified by the PAB before registering in MDD. Only an AMVLP can register in MDD”. The second sentence appears to contradict the first and what is the process for a VLP?	Updated wording to ‘An AMVLP also needs to be registered in MDD’

BSCP602 – SVA Metering System and Asset Metering Systems Register

Respondent	Location	Comment	Response
IMServ	Page 2 and 3	Effective date to be inserted? June 2022?	Implementation date and version numbers are completed during the implementation of document changes.
IMServ	Page 7	Could an example be given of multiple pairs and how this would map out?	Added some extra text “Note that an AMSID Pair can have more than one Associated MSID Pair, if the Asset sits behind more than one Boundary Points on a site, and more than one AMSID Pair can sit behind one or more Boundary Points on a site, so a Secondary BM Unit Allocation may have a ‘many to many’ relationship between AMSID Pairs and Associated MSIDs. AMVLPs must specify Delivered Volumes for each combination of AMSID Pair and Associated MSID Pair specified in a Secondary BM Unit Allocation”.
IMServ	2.1A.20	‘Has’ rather than ‘was’?	Amended accordingly

Self Assessment Document (SAD)

Respondent	Location	Comment	Response
IMServ	Page 7 Scope	This lists VLPs and AVLPs as different entities – should AMMOPs and AMHHDCs similarly be added to the list?	In Section X-1 the definition of Meter Operator Agent and Data Collector covers SVA and Asset Metering Equipment
IMServ	Section 9 HHDC Section	This infers that P375 brings mandatory changes to the existing HHDC role – is that correct?	No, this is not a mandatory service. This will be clarified upon transposition to the new BSCP. Updated SAD to clarify.
IMServ	Section 9 HHDC Section. 9.1.3	New clause regarding retrieval of data from an AMS. The words are fine however shouldn't there already be a clause like this for HHDC metering systems and if so, can it be appended. If no clause already exists then it needs to be added otherwise this new clause will highlight that gap.	The HHDC equivalent requirement to the AMHHDC Protocol part (9A.1.3) is 9.2.9. Asset Metering Equipment has been added to 9.2.9
IMServ	Section 9A AMHHDC Section 9A.1.8	Last sentence should be revised to read "AMHHDC"	Updated accordingly
IMServ	Section 9A AMHHDC Section 9A.1.8	Is the intention that the AMHHDC can collect data from a HHDC-serviced Asset Metering Systems? If yes, are we correct to interpret the definition of a HHDC serviced metering system as one for which the HHDC retrieves data direct, aka, the traditional and majority section of a HHDC's portfolio?	Corrected to AMHHDC-serviced Asset Metering System
IMServ	Section 13 SVA HHMOP Section 13.1.5. point 2	Why does the SVA MOP have the responsibility for ensuring that "Controls should be in place to confirm that Asset Metering Systems not installed by the SVA HHMOA are compliant with CoP 11; ; this is where an existing Metering System is to be used as an Asset Metering System"	Amended wording to make this a check to determine whether compliant when requested by an AMVLP
IMServ	Section 13 SVA HHMOP Section 13.1.7	Why are the retention and archiving rules for asset metering in the BSCP and not PSL 100?	PSL100 was not in Scope for Asset Metering. The retention and archiving was deliberately added to the BSCP for Asset Metering

IMServ	Section 13 SVA MOP	This infers that P375 brings mandatory changes to the existing HHMOP role – is that correct?	No, this is not a mandatory service. This will be clarified upon transposition to the new BSCP. Updated SAD to clarify.
Siemens	General	Presumably an HHDC can elect not to accept Asset Meter appointments. That being the case should the SAD not treat Asset Meters in the same way it treats Shared Meters? The section on Shared Metering makes it clear that this is optional.	We are checking the Shared arrangements having a note saying 'optional' whether an answer is expected as to why not. As Asset Metering processes mimic the Supplier Hub principle with a limited number of additions it would be expected that a HHDC should be able to do it but may choose not to by rejecting appointments from AMVLP in BSCP502

SVA Data Catalogue Volume 1 – Data Interfaces

Respondent	Location	Comment	Response
IMServ	General comment	We would hope that the impact to flow version numbers can be kept to an absolute minimum since a change would cause Wheatley users to incur potentially avoidable development costs, even where that MOA does not intend to offer an Asset Metering service.	With the exception of the Dxxxx, the flow numbers are now fixed
IMServ	Appendix A – Page 2	Under what scenario would an AMHHDC send a D0001 to the HHDC rather than the Pyyyy, does this make the Pyyyy unnecessary?	Method for AMHHDC to notify the HHDC that it is unable to get proving test data requested due to a fault
IMServ	Appendix A – Page 28	I think the correct name of flow Poooo should be 'Invalid Metering System Data'	Amended accordingly
IMServ	Appendix B – Page 27	Should the Ptttt not also include the AMMOA Id and associated details?	No, because you can only have an HHMOA or an AMMOA, parties can use a D0155 for this. Because n HHDC must always be appointed, and in some cases an AMHHDC as well, you cannot use that data flow, so the P flow was created solely for this purpose (i.e. the notification of the AMHHDC appointment to the other relevant Agents).

Siemens	Flow Dxxxx and general re. AMHHDC	<p>There is a requirement to send the Dxxxx to the AMHHDC but it appears the AMHHDC is not obliged to send/receive DTC flows (it is absent from all) or the AMHHDC is considered an HHDC for DTC purposes, in which case there should be a HHDC to HHDC interface.</p> <p>This appears to be inconsistent with SVA Data Catalogue Volume 1 which does list the AMHHDC separately and for the Dxxxx flow includes the AMHHDC to HHDC interface. Could this be clarified?</p>	<p>There is text in Section 1.3 of BSCP502 which states: “Where Data Transfer Catalogue (DTC) flows (“D-flows”) are referenced, these shall normally be sent over the Data Transfer Network (DTN). Where this is not possible, another method of transfer shall be agreed between the relevant parties, and the information transferred shall have the same content and format as it would if being transferred using the DTN”.</p> <p>We will add an extra statement: “AMHHDCs will not be recognised by the DTN, so should send Dxxxx data to HHDCs using an alternative method agreed with the HHDC”.</p> <p>I think we will say something similar about AMMOAs in BSCP514 (which will be migrated to the new BSCP for Asset Metering).</p>
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