

P375 'Metering behind the Boundary Point' – Review of Configurable Items

Date and time	5 July 2021	Purpose	For review
To	CVA and SVA Release Circular distribution lists	From	Releases

P375 'Metering behind the Boundary Point' – Review of BSC Configurable Items

1. What is the purpose of this circular?

- 1.1 This circular is to invite BSC Parties, Party Agents and any interested third parties to review the draft versions of the BSC Configurable Items (CIs) that we are amending for Modification [P375 'Metering behind the Boundary Point'](#), approved by Ofgem on 24 February 2021 with an implementation date of 30 June 2022 as part of the June 2022 BSC Release.
- 1.2 Please return your comments to releases@elexon.co.uk, using the review form provided as Attachment B to this circular, by **17:00 on 2 August 2021**.

2. Who is impacted by the Modification?

- 2.1 P375 will impact:
 - Virtual Lead Parties (VLPs);
 - Meter Operator Agents (MOAs);
 - Half Hourly Data Collectors (HHDCs);
 - Supplier Volume Allocation Agent (SVAA);
 - Technical Assurance Agent (TAA);
 - Audit scope increased to cover Asset Metering systems
 - Half Hourly Data Aggregators (HHDA);
 - There will be an increased volume of Boundary Point MSIDs for which HHDA's will need to submit D0385 data flows.

3. Which BSC Configurable Items do I need to review?

- 3.1 The following BSC CIs are presented for your review before being presented to the Panel for approval in September 2021. Please note that amendments to BSCP502 and BSCP514 will not be presented for approval – reasons for this can be found under section 4 of this document – but comments on the changes set out in these documents are welcomed. You can find all the amended CIs for P375 in Attachment A.

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'

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BSCP38 – ‘Authorisations’
BSCP502 – ‘Half Hourly Data Collection for SVA Metering Systems Registered in SMRS’
BSCP503 – ‘Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS’
BSCP507 – ‘Supplier Volume Allocation Standing Data Charges’
BSCP508 – ‘Supplier Volume Allocation Agent’
BSCP514 – ‘SVA Meter Operations for Metering Systems Registered in SMRS and Asset Metering Systems Registered with the SVAA’
BSCP537 – ‘Qualification Process for SVA Parties, SVA Party 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

- 3.2 Please see section 9 of this paper for a summary of the changes made to the documents.
- 3.3 Please note that the BSC Panel approved the new Code of Practice 11 and the amended version of BSCP601 for P375 at its December 2020 meeting for implementation on 30 June 2022. Consequently, these BSC Configurable Items are not included in this review but can be found in the Report Phase section of the [P375 webpage](#).
- 3.4 Other BSC Configurable Items, such as the Interface Definition Document (IDD) Part 1 document and spreadsheet and the SVAA User Requirement Specification (URS), which are dependent on the final software solution for P375, will be issued for industry review at a later date.
- 4. New and amended Data Flows for P375 to be transmitted across the Data Transfer Network**
- 4.1 There is one new Data Flow for P375 that should be transmitted across Data Transfer Network (DTN): ‘Dxxxx - Asset Metering System Half Hourly Metered Data’ from HHDCs to the SVAA. The Dxxxx contains one new DTN Data Item and will use the existing ‘MPAN Core’ DTN Data Item for Asset Metering System Ids (AMSIDs).
- 4.2 There are 19 existing DTN Data Flows that will require one or more new instances to support the new ‘AMVLP Hub’ processes for P375 set out in the P375 versions of BSCP502 and BSCP514 supplied with this paper.
- 4.3 There are also a number of existing instance of DTN Data Flows involving HHDCs and / or HHMOAs that include the ‘MPAN Core’ DTN Data Item which will also be used for P375 purposes without any change to their structure, through the use of the MPAN Core for AMSIDs.
- 4.4 The process for the approval of new and amended DTN Data Flows is changing as a result of the implementation of the Retail Energy Code in September 2021; instead of raising a Data Transfer Catalogue (DTC) Change Proposal for progression and approval under Master Registration Agreement (MRA) governance, proposed new and amended DTN Data Flows and Data Items must be approved under the relevant Code governance, in this case BSC governance, and then submitted to the REC Company (RECCo) for implementation in the new “Energy Market Data Specification” (EDMS) catalogue, which replaces the DTC as the catalogue of all Data Flows and Data Items to be sent across the DTN.
- 4.5 Elexon has raised two sets of proposed EDMD changes – one for the new data Flow in 4.1 and one for the amended Data Flows in 4.2, which are set out in Attachment C.

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5. Impact of Retail Energy Code implementation on P375

- 5.1 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.
- 5.2 We will raise a Modification in Autumn 2021 to re-baseline the P375 legal text so it can be implemented on the post-REC BSC.
- 5.3 Elxon will draft a new BSCP to incorporate the P375-related changes to BSCP514 (BSCPXXX – name to be determined). Elxon 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.
- 5.4 We ask that you review the new HHDC and MOA processes required to give full effect to P375 as set out in BSCP502 and BSCP514, but note that we will seek approval for these processes to be transferred into the new BSCP to become effective on 30 June 2022. The new BSCP will be drafted and sent out for formal industry review following the closure of this review, allowing any comments received to be taken into account. We expect this document to be presented to the Panel for its approval in October 2021 under P375 governance.
- 5.5 Elxon made the decision to circulate the amended documents in their current format (i.e. pre-REC) to allow industry the earliest possible opportunity to understand the processes being introduced for P375. Following this review period, the documents will be re-baselined against the changes being introduced by the REC before being presented to the Panel for approval in September.

6. AMSID data format – industry input request

- 6.1 This section concerns a request for information from HHDCs and MOAs.
- 6.2 As stated in section 8.3.4 of this paper, one of the key points of P375 is that we will introduce Asset Metering System Identifiers (AMSIDs) with the same 13-digit format as MSIDs (MPANs). However, we need to ensure that AMSID numbers can never be confused with MSIDs. To achieve this, we propose the use of a dedicated two digit short code that is not currently used by the industry. We are aware of distributor short codes used for MSIDs, and we are aware that many parties use other short codes for their own internal purposes – we want to avoid using a short code that is already in use for any purpose.
- 6.3 We believe that “77” may be a suitable short code to use for this purpose. Please can you let us know whether the use of this number would be acceptable and if not, why.
- 6.4 In order to help us identify an alternative if “77” is deemed inappropriate, please can you let us know of any short codes that your organisation uses for internal purposes. This information will be treated as confidential and will not be shared outside of Elxon.

7. What will happen after the industry review?

- 7.1 Elxon will consider all review comments and update the BSC CIs as required. Elxon will also inform the outcome of any comments to the relevant reviewer and, where we do not agree with a review comment, we will contact the reviewer to discuss the comment and agree on the course of action to take.
- 7.2 We will then take the documents and a summary of any consultation responses to the BSC Panel for approval at its meeting in September 2021 (with the exception of BSCP514 and BSCP502, where we will ask the Panel

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to note the proposed approach as described above). The Panel paper will note any comments that we did not action and the reasons why, and any subsequent course of action undertaken as a result.

8. When will the BSC Configurable Items become effective?

- 8.1 P375 was approved by the Authority on 24 February 2021 for implementation on 30 June 2022 as part of the June 2022 BSC Release. We will ask the BSC Panel to approve these BSC Configurable Items (with the exception of BSCP502 and BSCP514) to become effective on the P375 Implementation Date.
- 8.2 If you have any queries about this circular, please contact **Craig Murray** on **020 7380 4201** or email releases@elexon.co.uk.

Attachments

Attachment A – Amended BSC CIs for P375

Attachment B – Response Form

Attachment C - New and amended Data Transfer Network Data Flows and Data Items

Attachment D – P375 Final Modification Report

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

9. What's new for P375?

- 9.1 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 (Attachments C and D, respectively).
- 9.2 The P375 Workgroup recognised that further work was required to detail the processes that underpin P375 (VLP Agent qualification, Asset Registration etc. and the exchange of data between the 'VLP Hub' members) and so agreed that an Industry Expert Group (IEG) should be formed to discuss and agree the processes in the first quarter of 2021. The Workgroup members agreed that drafting the CIs in this way would allow the efficient progression of P375 whilst allowing the equivalent level of expert input into the creation of the processes. They also noted that the processes would reflect the P375 solution and therefore not impact the amended legal text, since approved by the Authority. If deemed necessary, the IEG can reconvene to consider responses to this review.
- 9.3 The key points of the P375 solution are:
 - 9.3.1 Virtual Lead Parties (VLPs) that wish to use Asset Metering will be required to complete a new Asset Metering (AMVLP) Qualification process;
 - 9.3.2 AMVLPs will be required to register Assets and related Asset Metering Systems with the SVAA, using a three-stage registration process set out in BSCP602;
 - 9.3.3 The SVAA will generate an Asset Metering System Id (AMSID) for each Asset Metering Systems, resulting in an AMSID Pair being generated for each Asset;
 - 9.3.4 AMSIDs will have the same 13-digit format used for MSIDs (MPANs), but will use an unique 2-digit short code not used for MSIDs. Elexon is proposing to use "77" for this short code.
 - 9.3.5 AMVLPs registering Assets will be required to appoint AMVLP Agents – Meter Operator Agents and Half Hourly Data Collectors or, where allowed by Code of Practice 11, 'lite' versions of these Agents – to AMSIDs;
 - 9.3.6 New "AMVLP Hub" processes will be introduced between AMVLPs, MOAs and HHDCs based closely on existing Supplier Hub processes;
 - 9.3.7 The new AMVLP role will be added to Market Domain Data to allow AMVLPs to become Data Transfer Network (DTN) Users;
 - 9.3.8 HHDCs will send Half Hourly Metered Volumes for AMSIDs to SVAA using a new DTN data flow;
 - 9.3.9 AMVLPs will be able to allocate AMSIDs to their Secondary BM Units for one of two purposes: Asset Metering & Asset Differencing, as set out in BSCP602;
 - 9.3.10 AMVLPs will be required to send AMSID Pair Delivered Volumes for AMSID Pairs used for Asset Metering and MSID Pair Delivered Volumes for AMSID Pairs used for Asset Differencing;
 - 9.3.11 There will be new versions of the P0282 – P0285 data flows to accommodate all VLP and AMVLP data submissions.
- 9.4 For more information on P375 please contact **Craig Murray** on 020 7380 4201 or email bsc.change@elexon.co.uk.

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

10. Summary of changes to CIs

- 10.1 The changes for P375 that will be of most interest to the industry are set out in BSCP602, BSCP502, BSCP514 and the SVA Data Catalogue. However, we have made changes to a number of other BSC Configurable Items to support the P375 solution.
- 10.2 The changes to BSCP602 set out the new processes by which suitably Qualified VLPs may:
- Register Assets and related Asset Metering Systems;
 - Receive Asset Metering System Identifier (AMSID) Pairs; and
 - Allocate AMSID Pairs to Secondary BM Units.
- 10.3 The changes to BSCP502 set out the new processes for Half Hourly Data Collectors.
- 10.4 The changes to BSCP514 set out the new processes and data estimation techniques for Meter Operator Agents.
- 10.5 The SVA Data Catalogue Volume 1 sets out all new and amended data flows for P375 and SVA Data Catalogue Volume 2 sets out all new data items used by the new and amended data flows.
- 10.5.1 Please note that the SVA Data Catalogues will be sent for further industry review at a later date alongside the IDD Part 1 document and spreadsheet and the SVAA URS.

11. Industry Expert Group Discussions

- 11.1 The P375 IEG, which included representatives of VLPs, Suppliers, Generators, HHDCs, Ofgem and the Association of Decentralised Energy (ADE) has met twice, in January and March 2021, where the group agreed the high-level principles against which the changes to the CIs should be drafted:
- 11.1.1 New 'VLP Hub' processes will be added to BSCP502 and BSCP514 and that the titles of these CSDs would be amended to add "and Asset Meters registered with the SVAA"¹;
- 11.1.2 New Qualification requirements for 'VLP Hub' members will be added to the Self Assessment Document (SAD);
- 11.1.3 New Data Transfer Catalogue (DTC) Data Flow (Dxxxx') for HHDCs to send Asset Metering Systems Metered data to SVAA;
- 11.1.4 HHDCs should send Actual data for an AMSID to the SVAA when available, but should send Estimated data for use in the SF VAR if Actual data is not available. Where a HHDC has submitted Actual data for an AMSID to the SVAA, there is no requirement for the HHDC to resubmit data for that AMSID. Where the HHDC has submitted estimated data, or has not submitted data, to the SVAA for SF, the SVAA will issue a P0034 Missing Data file to the HHDC as a reminder 2 WD in advance of the DA Run Date for each Reconciliation VAR until the HHDC has submitted Actual data for that AMSID.
- 11.1.5 Where possible, each "VLP Hub" data flow will be a new instance of the relevant Supplier Hub DTC data flow'. Other new data flows will be "P-flows" – i.e. will not be transmitted across the Data Transfer Network (DTN);
- 11.1.6 VLPs will not be mandated to use the DTN – but will be able to if they wish;
- 11.1.7 AMSIDs will have the same format as MSIDs (also called MPANs) - a 13 digit number where the first two digits will be a 'short code' not used by Distributors or other participants; and
- 11.1.8 In the VLP Hub DTC data flows, the J0003 'MPAN Core' Data Item should contain an AMSID instead of a MSID; and

¹ These changes will be transcribed into a new BSCP due to BSCP514 being transferred from the BSC into REC governance

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11.1.9 Where VLP Hub transactions are between parties that both have a DTN Gateway, D-flows should be used.

12. Qualification

- 12.1 The existing Qualification procedure for VLPs is unchanged, but VLPs wishing to Register Assets and related Asset Metering Systems and to allocate AMSID Pairs to their Secondary BM Units will be required to complete an additional Asset Metering VLP Qualification Process.
- 12.2 The existing Qualification procedures for HHDCs and for Meter Operator Agents is unchanged but there will be new Qualification procedures for Asset Meter HHDCs (AMHHDCs) and for Asset Meter Operator Agents (AMMOAs).

13. Assurance

- 13.1 Ofgem noted in its approval letter that Elexon should "... put in place an appropriately rigorous system of assurance checks", highlighting the importance of the independence of Assets behind the boundary Meter. With this in mind, Elexon explained its assurance plan around P375 to the IEG. In summary, this consists of four key aspects: Qualification; Material Error Monitoring (MEM) reporting; peer comparison; and post-implementation spot check.
- 13.2 Elexon asked the IEG whether it believed Supplier charges should be applied to VLPs. Members noted that these charges are based on settlement performance target recording requirements; as these are not relevant to the VLP role they should not be transferrable.
- 13.3 The Ofgem representative noted that the discussions and assurance plan had given them significant comfort that the appropriate assurance was being put in place for P375.