





BSC Modification Proposal Form		At what stage is this document in the process?
<h1>Allowing non-BSC Parties to request Metering Dispensations</h1>		<div style="display: flex; flex-direction: column; gap: 5px;"> <div style="border: 1px solid green; background-color: #00a651; color: white; padding: 5px; display: flex; align-items: center; justify-content: center;">01 Modification</div> <div style="border: 1px solid blue; padding: 5px; display: flex; align-items: center; justify-content: center;">02 Workgroup Report</div> <div style="border: 1px solid purple; padding: 5px; display: flex; align-items: center; justify-content: center;">03 Draft Modification Report</div> <div style="border: 1px solid orange; padding: 5px; display: flex; align-items: center; justify-content: center;">04 Final Modification Report</div> </div>
<p>Purpose of Modification: This Modification seeks to allow non-Balancing and Settlement Code (BSC) Parties to request Metering Dispensations on new connections and for Meter Operator Agents (MOAs) to submit the Application.</p> <p>Section L 'Metering' requires the Registrant of the Metering System to submit the Metering Dispensation application. This prevents an application from being submitted at the design stage, as Registrants of a Metering System are typically appointed later than the recommended 14 weeks prior to energisation of the related Metering System.</p> <p>Through this Modification, a Metering Dispensation can be submitted at the design stage of a new site, which is earlier than the recommended 14 week timeline. This will allow for amendments proposed by the ISG and/or SVG to be properly considered and increase the likelihood that they can be actioned, resulting in improved Settlement accuracy for the relevant Metering Systems.</p>		
<p>Is this Modification likely to impact any of the European Electricity Balancing Guideline (EBGL) Article 18 Terms and Conditions held within the BSC?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		
	<p>The Proposer recommends that this Modification should:</p> <ul style="list-style-type: none"> • be raised by the Panel in accordance with provisions of Section F2.1.1(d)(i) • not be a Self-Governance Modification Proposal • be assessed by a Workgroup and submitted into the Assessment Procedure <p>This Modification will be presented by the Proposer's representative to the BSC Panel on 10 March 2022. The Panel will consider the Proposer's recommendation and decide whether to raise the Modification in accordance with BSC Section F 2.1.1(d)(i) and determine how best to progress the Modification.</p>	
	<p>High Impact:</p> <ul style="list-style-type: none"> • N/A 	

	<p>Medium Impact:</p> <ul style="list-style-type: none">• N/A
	<p>Low Impact:</p> <ul style="list-style-type: none">• Suppliers• Registrants• Generators• Licensed Distribution System Operators (LDSOs)• National Grid Electricity System Operator (NETSO)

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Timetable


The Proposer recommends the following timetable:

Initial consideration by Workgroup	W/C 18 April 2022
Workgroup Meeting 2	W/C 16 May 2022
Assessment Procedure Consultation (15 WDs)	13 June 2022 – 5 July 2022
Workgroup consideration of Consultation responses	W/C 11 July 2022
Present Assessment Report to Panel	11 August 2022
Report Phase Consultation (10WDs)	17 August 2022 - 31 August 2022
Present Draft Modification Report to Panel	08 September 2022
Final Modification Report submitted to Authority	15 September 2022

 Any questions?


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1 Why Change?

What is the issue?

[BSC Section L 'Metering'](#)¹ allows the Registrant of a Metering System to apply for a Metering Dispensation if, for financial or practical reasons, the applicable Metering Equipment will not or does not comply with some or all of the requirements of a CoP.

These Metering Dispensation applications are assessed by the Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) shortly before the relevant electrical circuit is energised. It is recommended that Applicants submit their Metering Dispensation application at least 14 weeks before the requested approval date. Furthermore, the ISG requested at its meeting on [2 November 2021](#)² that these applications are submitted at an earlier stage in the site development process, preferably at the design stage, to allow the ISG and SVG enough time to propose amendments or reject the Metering Dispensation application with less impact on the applicant.

However, the requirement in Section L 'Metering', which requires the Registrant of the Metering System to submit the Metering Dispensation application, prevents an application from being submitted at the design stage as Registrants of a Metering System are typically appointed later than the recommended [14 weeks](#)³ ahead of energisation. This means that the application will be submitted later than the recommended 14 weeks, reducing the opportunity for the ISG and SVG to fully assess the application before approving, and the site's energisation can sometimes be delayed. There is a risk that the Settlement data from the Metering System may be inaccurate due to the ISG and SVG not being able to fully assess the Metering System before approving the application, to avoid unintended costs to the Registrant.

Assessing the Metering Dispensation application at an earlier stage in the site development process allows the applicant to address potential Settlement issues, providing an opportunity for changes to be made with less impact on the Registration of the site.

Desired outcomes

This Modification, if approved, should put in place a provision for non-BSC Parties to apply for a Metering Dispensation if, for financial or practical reasons, the Metering Equipment will not or does not comply with some or all of the requirements of the applicable Code of Practice.

Through this Modification, a Metering Dispensation can be submitted at the design stage of a new site, which is earlier than the recommended 14 week timeline.

¹ <https://www.elexon.co.uk/the-bsc/bsc-section-l-metering/>

² <https://www.elexon.co.uk/meeting/isg249/>

³ <https://www.elexon.co.uk/reference/exceptions/metering-dispensations/>

2 Solution

Proposed Solution

This Modification will amend Section L 'Metering' to allow non-BSC Parties to apply for Metering Dispensations. The site specific Metering Dispensation Applications will be assessed and supported by the relevant MOA to ensure that the proposed design and location of the Metering System is suitable and compliant with the BSC and the applicable Code of Practice (CoP).

A Supplier Volume Allocation (SVA) MOA shall be used for Metering Systems intended to be registered in the Supplier Meter Registration Service (SMRS) and a Central Volume Allocation (CVA) MOA shall be used for Metering Systems intended to be registered in the Central Meter Registration Service (CMRS).

This will require a change to [BSCP32 'Metering Dispensations'](#)⁴.

Benefits

The proposed solution will allow applications for site specific Metering Dispensations to be submitted at an earlier stage and give the opportunity for re-design of the Metering System to be practically possible before site works (e.g. laying foundations, construction of building etc.) have progressed to an extent that does not allow it. Consequently, this will allow for amendments proposed by the ISG and SVG to be properly considered and increase the likelihood that they can be actioned, resulting in improved Settlement accuracy for the relevant Metering Systems.

⁴ <https://www.elexon.co.uk/csd/bscp32-metering-dispensations/>

3 Relevant Objectives

Impact of the Modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) The efficient discharge by the Transmission Company of the obligations imposed upon it by the Transmission Licence	Neutral
(b) The efficient, economic and co-ordinated operation of the National Electricity Transmission System	Neutral
(c) Promoting effective competition in the generation and supply of electricity and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity	Neutral
(d) Promoting efficiency in the implementation of the balancing and settlement arrangements	Positive
(e) Compliance with the Electricity Regulation and any relevant legally binding decision of the European Commission and/or the Agency [for the Co-operation of Energy Regulators]	Neutral
(f) Implementing and administrating the arrangements for the operation of contracts for difference and arrangements that facilitate the operation of a capacity market pursuant to EMR legislation	Neutral
(g) Compliance with the Transmission Losses Principle	Neutral

(d) By allowing non-BSC Parties to apply for Metering Dispensations, it will enable an earlier submission and assessment of the application by the relevant Panel Committee(s). This will increase the likelihood that Settlement issues, when identified, are addressed in a timely manner. Additionally, it will remove the need for and burden of 'time critical' Metering Dispensation applications from being submitted.

4 Potential Impacts

Impacts on Core Industry Documents

Impacted Core Industry Documents			
<input type="checkbox"/> Ancillary Services Document	<input type="checkbox"/> Connection and Use of System Code	<input type="checkbox"/> Data Transfer Services Agreement	<input type="checkbox"/> Use of Interconnector Agreement
<input type="checkbox"/> Retail Energy Code	<input type="checkbox"/> Transmission License	<input type="checkbox"/> System Operator Transmission Owner Code	<input type="checkbox"/> Supplemental Agreements
<input type="checkbox"/> Distribution Code	<input type="checkbox"/> Grid Code	<input type="checkbox"/> Other (please specify)	

It is not anticipated there are any impacts on Core Industry Documents.

Impacts on BSC Systems

Impacted Systems				
<input type="checkbox"/> CRA	<input type="checkbox"/> CDCA	<input type="checkbox"/> PARMS	<input type="checkbox"/> SAA	<input type="checkbox"/> BMRS
<input type="checkbox"/> EAC/AA	<input type="checkbox"/> FAA	<input type="checkbox"/> TAAMT	<input type="checkbox"/> NHHDA	<input type="checkbox"/> SVAA
<input type="checkbox"/> ECVAA	<input type="checkbox"/> ECVAA Web Service	<input type="checkbox"/> Elexon Portal	<input type="checkbox"/> Other (Please specify)	

It is not anticipated that there will be any impacts on the BSC Systems.

Impacts on BSC Parties

Impacted Parties			
<input checked="" type="checkbox"/> Supplier	<input type="checkbox"/> Interconnector User	<input type="checkbox"/> Non Physical Trader	<input checked="" type="checkbox"/> Generator
<input checked="" type="checkbox"/> Licensed Distribution System Operator	<input checked="" type="checkbox"/> National Electricity Transmission System Operator	<input type="checkbox"/> Virtual Lead Party	<input type="checkbox"/> Other (Please specify)

Suppliers would take ownership of sites with an approved Metering Dispensation, but are not aware of the details of the Metering Dispensation.

Registrants will be made aware of existing Metering Dispensations. In deciding whether to be the Registrant for a particular Metering System they will need to consider any Metering Dispensations that are in place.

LDSOs and **NETSO** will have earlier visibility on the proposed type of connection at the site, and will be able to suggest amendments.

Impacts on consumers and the environment

Impact of the Modification on consumer benefit areas:	
Consumer benefit area	Identified impact
Improved safety and reliability	Neutral
Lower bills than would otherwise be the case	Neutral
Reduced environmental damage	Neutral
<p>Improved quality of service</p> <p>Through this Modification, Metering Dispensations applications can be submitted very early on in the site development process, providing enough time for the required assessment to be completed ahead of the proposed energisation date. As a result, the instances where the energisation of the site is delayed may be reduced.</p>	Positive
Benefits for society as a whole	Neutral

Legal Text Changes

The exact wording of the solution is subject to legal advice and the views of the Workgroup. However, changes to [BSC Section L 'Metering'](#), specifically section 3.4.1 which currently limits the application of Metering Dispensations to the Registrant of a Metering System, will be required.

5 Governance

Self-Governance

<input checked="" type="checkbox"/> Not Self-Governance – A Modification that, if implemented:	
<input checked="" type="checkbox"/> materially impacts the Code’s governance or modification procedures	<input type="checkbox"/> materially impacts sustainable development, safety or security of supply, or management of market or network emergencies
<input type="checkbox"/> materially impacts competition	<input type="checkbox"/> materially impacts existing or future electricity consumers
<input type="checkbox"/> materially impacts the operation of national electricity Transmission System	<input type="checkbox"/> is likely to discriminate between different classes of Parties
<input type="checkbox"/> involves any amendments to the EBGL Article 18 Terms and Conditions related to Balancing; except to the extent required to correct an error or as a result of a factual change	
<input type="checkbox"/> Self-Governance – A Modification that, if implemented:	
Does not materially impact on any of the Self-Governance criteria provided above	

The solution in this Modification, which seeks to amend BSC Section L ‘Metering’ 3.4 to allow non-BSC Parties to request Metering Dispensations, will materially impact the BSC governance which relates to criteria (b) (v). Therefore as an initial view, we recommend this Modification **should not** be treated as a Self-Governance Modification. This will be further assessed as part of the Workgroup procedure given the potential impact on the Code’s governance.

Progression route

<input checked="" type="checkbox"/> Submit to assessment by a Workgroup –:A Modification Proposal which:	
does not meet any criteria to progress via any other route.	
<input type="checkbox"/> Direct to Report Phase – A Modification Proposal whose solution is typically:	
<input type="checkbox"/> of a minor or inconsequential nature	<input type="checkbox"/> deemed self-evident
<input type="checkbox"/> Fast Track Self-Governance – A Modification Proposal which meets the Self-Governance Criteria and:	
is required to correct an error in the Code as a result of a factual change including but not limited to:	
<input type="checkbox"/> updating names or addresses listed in the Code	<input type="checkbox"/> correcting minor typographical errors
<input type="checkbox"/> correcting formatting and consistency errors, such as paragraph numbering	<input type="checkbox"/> updating out of date references to other documents or paragraphs
<input type="checkbox"/> Urgent – A Modification Proposal which is linked to an imminent issue or current issue that if not urgently addressed may cause:	
<input type="checkbox"/> a significant commercial impact on Parties, Consumers or stakeholder(s)	<input type="checkbox"/> a Party to be in breach of any relevant legal requirements.
<input type="checkbox"/> a significant impact on the safety and security of the electricity and/or gas systems	

This Modification should be progressed to the Assessment Phase for consideration by an industry Workgroup, as the solution is not minor or self-evident and requires further development.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

It is not believed that this Modification impacts an active SCR and so it is requested that it be treated as an SCR-exempt Modification Proposal.

Does this Modification impact any of the EBGL Article 18 Terms and Conditions held within the BSC?

It is not believed that this Modification impacts any of the EBGL Article 18 Terms and Conditions held within the BSC, and as such would not be required to follow the EBGL change process.

Implementation approach

The Proposer recommends this Modification be implemented **five Working Days (WDs) after the Authority decision is made**, subject to Workgroup assessment. This approach is to ensure the solution from the Modification is implemented at the earliest opportunity.