# **CP** Assessment Report

# CP1522 'Updates to BSCP520 to align with working practices and UMSUG recommendations'

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#### **About This Document**

This document is the Change Proposal (CP) Assessment Report for CP1522 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 7 January 2020. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1522.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation;
- Attachment A contains the CP1522 Proposal Form;
- Attachment B contains the proposed redlined changes to deliver CP1522; and
- Attachment C contains the full responses received to the CP Consultation.

# ELEXON



#### Committee

Supplier Volume Allocation Group (SVG)

#### Recommendation

**Approve** 

#### **Implementation Date**

25 June 2020 (June 2020 BSC Release)



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#### **Background**

#### What are Unmetered Supplies under the BSC?

All electricity transfers at points of connection, and supply, via circuits connected to the Distribution Network are metered. The exception to this rule is in a limited number of defined circumstances set out in the <a href="Electricity (Unmetered Supply">Electricity (Unmetered Supply)</a> Regulations 2001 (Statutory Instrument 2001/3263). These exceptions, known as Unmetered Supplies (UMS), are at the discretion and approval of the Unmetered Supplies Operator (UMSO) of the relevant Licensed Distribution System Operator (LDSO).

A UMS means a supply of electricity to a particular inventory of equipment in respect of which an LDSO has issued an Unmetered Supply Certificate. For example, this equipment could be any electrical equipment that draws a current and is connected to the Distribution Network without a Meter, e.g. street lights, traffic signs, zebra crossings etc.

The Balancing and Settlement Code (BSC) and <u>BSC Procedure (BSCP) 520 'Unmetered Supplies Registered in SMRS'</u> set out how the energy used by UMS equipment is calculated and applied in Settlement.

#### **Unmetered Supplies Operator (UMSO)**

The UMSO is a qualified Market Role which provides services for the LDSO, commonly known as the Distribution Business or Network Operator. The UMSO is responsible for looking after all of the UMS on its network. The UMSO makes new connections and decides what equipment is suitable for treatment as an UMS. The UMSO provides a summarised inventory to the Meter Administrator (MA) for Half Hourly (HH) traded UMS or calculates an Estimated Annual Consumption (EAC) for Non-Half Hourly (NHH) traded UMS.

#### **Unmetered Supplies User Group (UMSUG)**

The UMSUG is an expert group reporting to the SVG, advising it on the UMS arrangements under the BSC. Its work includes reviewing Charge Code applications, advising on changes to the relevant BSC subsidiary documents (e.g. to BSCP520), the resolution of issues and new developments relating to UMS. The UMSUG is chaired by ELEXON and meets on an ad-hoc basis driven by the SVG and business need.

#### **Meter Point Administration Number (MPAN)**

Each point of entry and exit onto a Distribution System Operator's Distribution System has an associated Metering Point, and each Metering Point has a Metering System Identifier (MSID, also known as a Metering Administration Number (MPAN)).

MPAN is the term used in the Master Registration Agreement (MRA), while the BSC uses the term MSID. However, as the two terms describe the same entity, they can be used interchangeably.

For each UMS inventory that identifies UMS assets that are NHH traded there are up to four types of MSIDs depending on how the assets function (e.g. continuous, dust to dawn or other). Under the MRA definition they are defined as 'Related MPANS'.



# Licensed Distribution System Operator (LDSO)

LDSO's are licensed by Ofgem to distribute electricity from the Transmission Network operated by National Grid through a network of wires to customer's premises.



#### Supplier Meter Registration Service (SMRS)

The SMRS is the service provided or to be provided by an LDSO for the registration of Metering Systems at Boundary Points on its Distribution System(s) and its Associated Distribution System(s) (if any), in accordance with the Master Registration Agreement.

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#### What is the issue?

The UMSUG has identified a number of issues with <u>BSC Procedure (BSCP) 520 'Unmetered Supplies Registered in SMRS'</u> that, if addressed, would remove redundant obligations, clarify responsibilities and align the BSC's Unmetered Supplies arrangements to current practices and a recent MRA change. These are:

# 1) The requirement for Meter Administrators to calculate reactive power is redundant

BSCP520 places an obligation on Meter Administrators to determine the reactive power used by unmetered equipment. The requirement is not designed to facilitate the BSC, but was originally intended to support the LDSOs in fulfilling non-BSC arrangements calculation of Distribution Use of System (DUoS) charges. However, the output of this calculation is no longer used by the industry and is therefore redundant. This is therefore placing an unnecessary obligation on Meter Administrators.

# 2) The split of responsibilities for Unmetered Supplies between the Licensed Distribution System Operator (LDSO) and the Unmetered Supplies Operator (UMSO) are not clear

Currently requirements in BSCP520 are not always clear whether an action should be performed by an LSDO or UMSO. In addition, the interaction between the LDSO and the UMSO, to enable Unmetered Supplies to be managed, is not clearly documented in BSCP520. For example, UMSOs establish connection agreements between LDSOs and customers in the allocation of Metering Point Administration Numbers (MPANs) for Unmetered Supplies. This is because BSCP501 requires LDSOs to allocate MPANs and notify the Supplier Meter Registration Service (SMRS) of the MPANs raised for new supplies and, in the case of Unmetered Supplies, the LDSO is responsible for notifying the UMSO of the MPANs raised. However, in BSCP520 the requirement to request MPANs from the SMRS is on the UMSO. As such it is not clear in BSCP520 when the USMO is acting on behalf of the LDSO.

# 3) BSCP520 does not reflect the June 2019 updates to the Master Registration Agreement (MRA) Related Meters Meter Asset Provision (MAP)

Related Meters have been used since 1998 to relate up to four MPANs for a single customer inventory. Previously, this required the MPANs to be identified using a range of Meter Timeswitch Class/Codes (MTC) for non-Related and Related MPANs. This identification was intended to ensure that if one of the MPANs in the related group changed Supplier, all the related MPANs would transfer together.

BSCP520 is not in line with a recent MRA change resulting from the <u>Ofgem led Faster</u> <u>Switching programme</u>. When UMS connections are established, BSCP520 currently requires the LDSO to provide a UMS certificate to the customer and their Supplier, including a list of related MPANs.

The Ofgem led Faster Switching programme has initiated a series of changes to the MRA. One of these was <u>DTC CP 3550</u>, which was implemented in June 2019. DTC CP 3550 created a new data field in the Meter Point Administration Service (MPAS) which is



#### Ofgem's Faster Switching programme

The programme's objective, is to improve consumers' experience of switching, leading to greater engagement in the retail energy market, by designing and implementing a new switching process that is reliable, fast and costeffective.



# Meter Timeswitch Class/Code (MTC)

The Meter Timeswitch
Code (Data Item J0220) is
described in the Data
Transfer Catalogue (DTC)
as a "unique identifier of
an indication of the
charging regimes that a
Meter at a Metering Point
will support and an
indication of the switching
behaviour of the Meter
through time for the
register of Meter
consumption"

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updated by the Related MPAN Indicator 1 (J2245) on the D0386 'Manage Metering Point Relationships' to determine whether an MPAN is in a Related MPAN relationship. As such, this change provided Suppliers with a new Data Flow (D0386) to update MPANs with Related Metering Points for the purposes of Switching. In the future, when a request for Change of Supplier is processed, the Related MPAN Indicator will be used to enforce the Change of Supplier for all MPANs which are linked.

This obligation on Suppliers to create and amend relationships between MPANs and send D0386 'Manage Metering Point Relationships' when a UMS certificate contains related MPANs is currently not reflected in BSCP520.

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#### 2 Solution

#### **Proposed solution**

The following changes are proposed to BSCP520 to deliver the CP1522 solution. The redlined changes for this CP can be viewed in Attachment B.

#### 1) Reactive power calculation

 Remove the requirements upon the Meter Administrator to calculate reactive power.

#### 2) Changes for LDSO/UMSO role split

- Amend section 1.1.1 to clarify that the UMSO is acting on behalf of the LDSO in establishing a Connection Agreement; as the parties to a Connection Agreement are the Customer and the LDSO.
- Amend section 1.2: to add LDSOs as a user of BSCP520 and a split of responsibilities between the LDSO and the UMSO.
- Amend section 3.1 to add a new inventory to show the UMSO requests new MPANs from the LDSO and the LDSO notifying SMRS; with the new MPAN being sent to the UMSO by the LDSO rather than the SMRS.
- Amend 3.8: to show that the disconnection of an MPAN should be controlled by the UMSO who will be best placed to identify whether an MPAN is no longer required. Physical disconnection of items connected to the network may be carried out by the LDSO, but unless all items in an inventory are disconnected the MPAN will still be required. However, in the event that an MPAN is no longer required it is the LDSO that notifies the SMRS of the disconnection.
- Amend 4.5.4: to show that the Consumption Adjustments following LDSO
   Inventory the UMSO agrees the inventory on behalf of the LDSO and makes any consumption adjustments following an inventory audit.

#### 3) Reflect the June 2019 updates to the MRA

Update BSCP520 to reflect the changes to the MRA Agreed Procedure for Managing NHH Related Metering Points, which includes the following requirements on UMSOs and Suppliers under the BSC:

- Obligate Suppliers to create and amend relationships between MPANs using the D0386 'Manage Metering Point Relationships' when a UMS certificate contains related MPANs;
- Obligate Suppliers to assign a Related Metering Point MTC to each of the Related Metering Points and update SMRS. This is where the UMSO notifies the Supplier that a number of Metering Points are now classified as Related Metering Points; and
- Obligate Suppliers to assign a non-Related Metering Point MTC to each of the previously Related Metering Points and update SMRS. This is where the UMSO notifies the Supplier that a number of Metering Points that were previously classified as Related Metering Points are now no longer classified as Related Metering Points.

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#### **Proposer's rationale**

These changes will support, clarify and remove potential inefficiencies in the BSC's UMS arrangements.

At its meeting on 28 August 2019, the UMSUG recommended that ELEXON raise this CP (see UMSUG papers  $\underline{126/02}$  and  $\underline{126/03}$ ).

### **Proposed redlining**

Attachment B contains the proposed redlining to BSCP520 `Unmetered Supplies Registered in SMRS'.

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# 3 Impacts and Costs

#### **Central impacts and costs**

#### **Central impacts**

CP1522 will require changes to BSCP520. No BSC System changes are required for this CP and there will be no impacts on BSC Agents.

Central Impacts	
Document Impacts	System Impacts
• BSCP520	• None

#### **Central costs**

The central implementation costs for CP1522 will be approximately £240 (one ELEXON working day of effort) to make the required document change.

#### **BSC Party & Party Agent impacts and costs**

BSC Party &	Party Agent Impacts
BSC Party/Party Agent	Impact
UMSO	We expect changes to local working practices
LDSO	Although CP1522 is not changing the responsibilities of LDSOs, but is instead ensuring they are explicitly detailed, some of the respondents to the CP consultation indicated that they require new internal processes to manage the tighten relationships between LDSOs, UMSO and SMRA.
Supplier	Low impact anticipated – Although CP1522 will obligate Suppliers to send the new D0386 flow, until CP1522 is approved and implemented Suppliers can use the existing procedure to update MPANs with Related Metering Points and use MTC 502-505 to identify and ensure related MPANs are switched together. This CP will therefore require Suppliers to use the new D0386 and update internal processes accordingly. Any Supplier who has not amended its systems to send the D0386 will also be required to update its systems.
SMRA	Low impact anticipated – Where not already implemented for DTC CP3550, will be required to receive the new D0386.
MA	Small impact resulting in reduced obligations - Remove requirement to calculate Reactive Power.

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# 4 Implementation Approach

CP1522 is targeted for implementation on **25 June 2020** as part of the June 2020 BSC Release. This is the next available Release such that the benefits can be realised at the earliest opportunity.

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### 5 Initial Committee Views

#### **SVG's initial views**

CP1522 was presented to the SVG on 5 November 2019. The SVG noted that CP1522 had been raised, noted the proposed progression timetable and provided no further comments before it was issued for CP Consultation.

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#### **6** Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

Summary of CP1522 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1522 proposed solution?	5	2	0	0
Do you agree that the draft red`lining delivers the intent of CP1522?	3	4	0	0
Will CP1522 impact your organisation?	6	1	0	0
Will your organisation incur any costs in implementing CP1522?	4	3	0	0
Do you agree with the proposed implementation approach for CP1522?	6	1	0	0
Do you have any further comments on CP1522?	0	7	0	0

Seven market participants responded to the CP1522 consultation. Five represented the role of Distributor, one represented the role of Supplier, one represented the role of Supplier Agent, and one represented the role of UMSO.

#### **Proposed CP1522 solution**

Five respondents agreed with the proposed solution; stating the proposed changes will bring BSCP520 in line with current industry processes.

One respondent who disagreed with the CP1522 solution outlined further amendments to the redlining they felt were required. The comments, along with ELEXON's responses, are outlined in Appendix 2.

Another respondent agreed with the first two aspects of the proposed change (removal of reactive power and the clarification of the split between the LDSO and UMSO roles) however felt the third change proposed under CP1522 (Related MSIDs) lacked reference to any obligation on the UMSO. The respondent stated they would support CP1522 if the UMSO had a matching obligation to notify the Supplier. ELEXON clarified that, as part of the CP1522 redlining, sections 3.1.21 & 3.2.9 of BSCP520 contain requirements for the UMSO to inform the Supplier of the new/revised UMS Certificate. The UMS Certificate includes all the MSIDs/MPANs relevant for that Inventory and where there is more than one MSID/MPAN on the Certificate then all the MSID/MPANs are related.

ELEXON engaged with both respondents that did not initially agree with the proposed solution for CP1522 to discuss their concerns. They both noted the amendments to the solution and associated redlining, and now agree with the CP1522 solution.

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#### **Proposed CP1522 redlining**

Three respondents agreed with the redlining for CP1522 and four did not agree. One respondent highlighted their prior comment relating to the need for a clear obligation for the UMSO to notify the supplier of related MPANs. As outlined above, this was subsequently clarified.

Another respondent stated that although they agreed that the draft redlining delivers the CP1522 proposed solution, they felt that the requirements of the MRA MAP 29 (Agreed Procedure for Managing NHH Related Metering Points) should be included under Section 3.8 (Disconnection of an MSID). We have amended the initial steps in 3.8 to reflect these additional steps.

The respondent also stated that consideration should be given to the requirements of the Central Switching Service (CSS), which is expected to go live on the 1 April 2021 as part of Ofgem's Faster Switching Programme. They highlighted the specific relation between CSS and CP1522; namely, the rules (as set out in BSC520) currently require that an MSID/MPAN cannot be disconnected if it is a Related MSID/MPAN and the disconnection will be rejected if this is the case. ELEXON notes that, as this work is currently in progress, CP1522 should be progressed now as it holds enough standalone benefits: the removal of the redundant requirement to calculate reactive power; the clear split of responsibilities for Unmetered Supplies between the LDSO and the UMSO; and the consequential update to BSCP520 to reflect the June 2019 updates to the MRA Related Meters Meter Asset Provision (MAP).Once there's more clarity on CSS, further changes can be made through the change process in the future. ELEXON has raised Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme' to review several processes related to switching, Change of Supplier and Change of Agent.

The full comments provided by the respondents relating to the redlining are reproduced in Appendix 2, along with ELEXON's response.

#### CP1522 impacts and costs

Six respondents stated they would be impacted by the proposed changes. They all identified the impacts to be minimal or relating the establishment of new internal processes.

Four respondents stated they would incur costs in implementing CP1522. The costs incurred relate to training LDSOs to manage the UMSOs and document changes. No indication of specific amounts or magnitudes cost were provided by the respondents.

#### **CP1522** implementation approach

Six out of seven respondents agreed with the Implementation Date for CP1522. The respondent who disagreed with the implementation approach highlighted that change does not take into account the proposed move to a centralised registration system and as such BSCP520 will have to be re-opened to accommodate further change. The respondent described, as an example, the changes proposed to Section 3.1.22 stating:

"A Supplier is charged with sending a D055 flow to SMRA for registration of Supplier to a Specified Metering Point. Under the new rules the D0055 flow will no longer be sent to SMRA, the Supplier will inform CSS directly, which in turn will

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pass the relevant information to the appropriate SMRA. The removal of this process within SMRA could have consequential changes throughout BSCP520 and in our view it would be more pragmatic to review this BSCP to meet the requirements of the significant industry change that is imminent. It is suggested that any changes to BSCP520 be aligned to the implementation date of CSS in order that a full solution be implemented."

ELEXON notes that Ofgem's Faster Switching Programme is currently in progress and the CSS is expected to go live on 1 April 2021. Moreover, ELEXON understands that the changes to the use of D0055 flows would impact a number of BSCPs. However, as mentioned, Issue 86 has been raised to review several processes relating to Switching, Change of Supplier and Change of Agent. We therefore propose to implement CP1522 as part of the next available release (June 2020) as the changes proposed hold sufficient enough standalone benefits to be implemented alone.

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### 7 Recommendations

#### We invite you to:

- AGREE the amendments to the proposed redlining for BSCP520 for CP1522 made following the CP Consultation;
- APPROVE the proposed changes to BSCP520; and
- **APPROVE** CP1522 for implementation on 25 June 2020 as part of the June 2020 BSC Release.

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# Appendix 1: Glossary & References

#### **Acronyms**

Acronyms used in this document are listed in the table below.

Acronyms		
Acronym	Definition	
BSC	Balancing and Settlement Code	
СР	Change Proposal	
EAC	Estimated Annual Consumption	
НН	Half Hourly	
MA	Meter Administrator	
MPAN	Meter Point Administration Number	
MRA	Master Registration Agreement	
MTC	Meter Timeswitch Class/Code	
LDSO	Licenced Distribution Supply Operator	
SMRS	Supplier Meter Registration Service	
SVG	Supplier Volume Allocation Group	
UMS	Unmetered Supply(ies)	
UMSO	Unmetered Supplies Operator	
UMSUG	Unmetered Supplies User Group	

#### **DTC data flows and data items**

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items		
Number Name		
D0386	Manage Metering Point Relationships	
J2245	Related MPAN Indicator	
D0055	D0055 Registration of Supplier to Specified Metering Point	

#### **External links**

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External	External Links		
Page(s)	Description	URL	
2	The Electricity (Ollinictered	http://www.legislation.gov.uk/uksi/2001/326 3/contents/mad	

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External	External Links		
Page(s)	Description	URL	
2	PDF link to ELEXON Webpage on BSCP520	https://www.elexon.co.uk/bsc-and-codes/bsc-related-documents/bscps/	
4	Ofgem's webpage on the Faster Switching programme	https://www.ofgem.gov.uk/gas/retail- market/market-review-and-reform/smarter- markets-programme/switching-programme	
5	ELEXON Webpage for UMSUG meeting 126	https://www.elexon.co.uk/meeting/umsug- 126/	
11	Issue 86 'Review of processes potentially impacted by Ofgem's Faster Switching Programme'webpage	https://www.elexon.co.uk/smg-issue/issue- 86/	

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# Appendix 2: Comments on the proposed redlining for BSCP520

Comments on th	e CP1522 Proposed Redlining	
Document & Location	Comment	ELEXON's Response
1.2.1	Question whether the drafting reflects the way that IDNOs may operate under DCUSA/National Terms of Connection, whereby a customer with items connected to an IDNO network may elect to include those items in the inventory submitted to the "host" LDSO?  In this case the IDNO is not appointing the "host" LDSO to be its UMSO, the customer is exercising an option. So for an LDSO that is an IDNO, they may have dealings with many UMSOs but may have appointed a different UMSO directly themselves.	Added a footnote to clarify that the LDSO is not required to appoint an UMSO where embedded LDSO uses host LDSO's inventory.
1.2.1	In the last paragraph remove "an" from "where changes relate to an SMRA registration data".	Removed "an"
1.3.5 (e)	As per Schedule 2 of the MRA, the supplier is responsible for the provision and maintenance of the MTC. It is not clear why the certificate issued by the UMSO should contain the MTC and whether that MTC should be the one the UMSO believes to be correct or the one the supplier has chosen?	There are no changes proposed to this paragraph. The MTC has always been included on the UMS Certificate
1.4 Section 3 second para	We believe that this paragraph needs to be re-written. If the information sent includes an MPAN/MSID then the ICO deems that personal information and as such needs to be sent securely, which in the case of D flows should be over the DTN or other secure method, not e-mail. From a SP Distribution perspective any	Email has been an established method of communication since 1998. Inclusion of all the UMSO and MA flows into DTN would be welcomed. We do not believe an MPAN that relates to a UMS inventory could be deemed 'personal information' as it does not relate to a 'person' as it would for domestic premises.

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Document & Location	Comment	ELEXON's Response	
Scation	information sent to the MA would normally exclude MPAN information and in such circumstances we would normally send the information via e-mail.		
3.1.5	Remove "SMRA Allocate", full stop after "certificate", and add full stop at end of sentence in Action column.  In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.		
3.1.5	We believe that the action needs to be clarified as it appears to be rather confusing. It may be more appropriate to	Clarified as per the above comment relating to the same section.  In relation to the comment on how the UMSO is expected to pass on the UMS Certificate to the LDSO, the UMSO provides information to the LDSO to raise the MSID and then inform the UMSO of the MSID. The UMSO can then create the Certificate in step 3.1.7.	
3.1.18	"Related Meter status" the supplier is responsible for managing the metering point relationship (see 3.1.23, 3.2.11) and this data items cannot be communicated by the UMSO. The UMSO can communicate the "metered" indicator however.	Agree replace Related Meter status with Metered Indicator	
3.1.19	In Action column, brackets required on "MSID(s)" in all occurrences.  In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.	Amended	SVG227/03 CP1522
3.1.21	In the To column, the recipients should be realigned to clarify that UMS certificate should be sent to the Supplier by "Electronic or other agreed	Amended	CP Assessment Report 31 December 2019 Version 1.0 Page 17 of 20

Document & Location	Comment	ELEXON's Response	
	method", whilst communication with the customer is by "Paper, fax or electronic media, as agreed."  Also remove blank line above "P0207"		
3.1.23, 3.2.11	& update MTC if required?	Agree, revised text and added MTC to acronyms.	
3.2.7	In Action column it could be that more than one MSID is required so reinstate the "(s)" after "additional" but not later in the sentence. Needs a full stop after "data".  In From column it should be LDSO.  In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.	Amended	
3.2.7	SMRA to SMRA? This does not appear to make sense as at this time we do not exchange information between SMRA's.	Amended to LDSO to SMRA	
3.2.8	Should be SMRA to UMSO as it requires P0171 request creation of UMS skeleton SMRS record – the LDSO cannot send a request on behalf of SMRA	Amended to reflect that the P0171 is sent to SMRA in 3.2.7 the LDSO then sends details of MSID(s) to the UMSO in 3.2.8	
3.2.9	In the To column, the recipients should be realigned to clarify that UMS certificate should be sent to the Supplier by "Electronic or other agreed method", whilst communication with the customer is by "Paper, fax or electronic media, as agreed."	Amended	SVG227/03 CP1522 CR Assessment Report
	The reference to Appendix 4.4 in the Information Required is not needed here, or else it		CP Assessment Report 31 December 2019
	should be included wherever an UMS Certificate is issued by the		Version 1.0 Page 18 of 20
	UMSO, e.g. 3.1.21.		© ELEXON Limited 2

Comments on th	ne CP1522 Proposed Redlining		
Document & Location	Comment	ELEXON's Response	
3.3.2.7	Typo – "UMAO"	Amended	
3.7.1	Typo – "UMSP"	Amended	
3.7.1/3.7.7	Not all physical works will cause a de-energisation. Add "as appropriate"	No amendment required as covered in second paragraph or on the basis that if there is no change to energisation status the step is not followed	
3.7.7	We note that this section does not contain a Customer to UMSO requirement, whereas section 3.7.1 does. Is there any reason behind this omission?	Amended	
3.8.1 & 3.8.2	Re 3.8.1 - In the action the word 'no' appears to be missing – It should read UMSO advises LDSO that MSID is no longer required and can be disconnected.  However, we believe that Sections 3.8.1 and 3.8.2 are incorrect and need to be revised.  Section 3.8.1 – The UMSO should not advise or determine that the LDSO is to disconnect the MSID, such an instruction should be directly from the customer to the LDSO who is responsible for managing the physical disconnection. The rules relating to disconnections are outlined in MAP21 under the MRA.  Similarly in 3.8.2, once the disconnection is complete it is the LDSO who is responsible for advising all parties of such an action , therefore the LDSO in this instance should contact the SMRA, Supplier and UMSO.	The 'No' has been reinstated. The footnote identifies a number of scenarios where the MSID is disconnected. The Supplier and the SMRA are identified in 3.8.2 (now 3.8.5) and informed by the LDSO, UMSO will be informed of the disconnection through the data provided by the LDSO under 1.2.1.  The MRA Agreed Procedure for Disconnections MAP21 specifically excludes matters relating to the disconnection of Unmetered Supplies that fall under the governance of the Balancing and Settlement Code (BSC), including BSC Procedure 520.	SVG227/03
3.8	New Section 3.8.2a	Amended	CP1522 CP Assessment Repor
	On receipt of the D0125		31 December 2019
	Initiate a change to the metering		Version 1.0
	point relationship		Page 19 of 20

Comments on the CP1522 Proposed Redlining			
Document & Location	Comment	ELEXON's Response	
	From Supplier To SMRA Send D0386 to end the metering point relationship		
3.9.2.1	requires D0052 is sent on a new connection, this is not possible as no Supplier will have been appointed, to allow sending of the D0052	This section relates to 'NHH Trading'. Establishment of a new inventory is covered in Section 3.1. This step is mirrored in 3.1.24 when the Supplier is involved and the NHHDC has been appointed.	

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