

# CP Progression Paper

## CP1542 'Transfer the obligation to visit de-energised sites annually from Data Collector to Supplier'

**ELEXON**



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### Committee

Supplier Volume Allocation Group (SVG)



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### Contents

<b>1</b>	Summary?	<b>2</b>
<b>2</b>	Why Change?	<b>3</b>
<b>3</b>	Solution	<b>6</b>
<b>4</b>	Impacts and Costs	<b>7</b>
<b>5</b>	Implementation Approach	<b>9</b>
<b>6</b>	Proposed Progression	<b>10</b>
<b>7</b>	Recommendations	<b>11</b>
	Appendix 1: Glossary & References	<b>13</b>

### About This Document

This document provides information on new Change Proposal (CP) CP1542 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to the SVG on 2 March 2021 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

There are five parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.
- Attachment A contains the CP1542 proposal form.
- Attachments B-C contain the proposed redlined changes to deliver the CP1542 solution.
- Attachment D contains the Issue 85 Issue Report.

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SVG241/07

CP1542  
CP Progression Paper

---

23 February 2021

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Version 1.0

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Page 1 of 13

---

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# 1 Summary?

## Why change?

The [Issue 85 'Removal of obligation to visit de-energised sites once every 12 months from BSCP504'](#) Group concluded that a Change Proposal be raised to amend [Balancing and Settlement Code Procedure \(BSCP\) 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) to transfer the obligation to visit de-energised sites on an annual basis from Data Collectors (DCs) to Suppliers.

They were also in agreement that the table in 3.4.1 in BSCP504 should be rearranged so that important information in the footnote should be brought up to the main table as having text in the main body is clearer than including it within a footnote.

## Solution

Transfer the obligation in [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) to visit de-energised sites on an annual basis from Non Half Hourly Data Collectors (NHHDCs) to Suppliers. For consistency, the [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) obligation for HHDCs (Half Hourly Data Collectors) to visit de-energised sites will also be placed on Suppliers so that both the Non Half Hourly (NHH) and Half Hourly (HH) markets are aligned.

## Impacts and costs

CP1542 will impact Suppliers, HHDCs and NHHDCs. CP1542 requires changes to [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#).

There are no central BSC system impacts arising from this CP.

## Implementation

This CP is recommended for implementation on 24 February 2022 as part of the February 2022 BSC Release.

## 2 Why Change?

### What is the issue?

There is an obligation in [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) on Non Half Hourly Data Collectors (NHHDCs) to visit de-energised sites annually (footnote 99).

Footnote 99 exists for the process whereby a NHHDC collects Meter register readings for designated Supplier Volume Allocation (SVA) Metering Systems either directly or via the Supplier, for which it must conduct a Site Visit.

The footnote 99 provision exists within the Balancing and Settlement Code (BSC) to ensure that, where sites are registered as de-energised, they do not have any Meter advances, thus protecting the integrity of Settlement.

Under the Standard conditions of the [Electricity Supply License](#), in the case of energised sites, Suppliers are explicitly required to gain a Meter reading annually. Further, Suppliers are responsible for the activities of their agents in relation to Metering Systems.

In a scenario whereby the Supplier doesn't instruct the NHHDC to visit de-energised sites annually in line with BSCP504 obligations, the footnote 99 provision has the potential to cause NHHDCs to become non-compliant under obligations in BSCP504. The obligation is solely on the NHHDC with no matching obligation on the Supplier, leaving Party Agents exposed to non-compliance. The ability of the NHHDC to comply with this obligation is greatly impaired by accessibility to de-energised sites, pointing to the fact that the current obligation is not the best way to ensure data accuracy from de-energised sites.

### Background

#### What are de-energised sites?

De-energisation is when any Boundary Point or Systems Connection Point is disconnected and no electricity can flow to or from the system.

[BSC Section X, Annex X-1 'General Glossary'](#) describes de-energisation as:

"In relation to any Boundary Point or Systems Connection Point (or the Plant or Apparatus connected to any System at such a point) the movement of any isolator, breaker or switch or the removal of any fuse whereby no electricity can flow at such point to and from a System; and **"de-energised"** shall be construed accordingly"

De-energised means the temporary removal of the supply at a Defined Metering Point (e.g. the main circuit connections to the Licenced Distribution System Operator's (LDSO) network are still made) such that all or part of the Metering Equipment is considered to be temporarily "inactive" for the purposes of Settlement e.g. unoccupied premises where the incoming switchgear has been opened or the cut-out fuse(s) removed and any generation disconnected.

If a Metering System has not been de-energised, the volume of energy allocated to the Supplier will be calculated using the latest Estimated Annual Consumption (EAC). When the NHHDC gains access to the site and records a Meter reading, an Annualised Advance (AA) can be calculated which will reflect the true consumption on site.

However, in many cases NHHDCs are unable to gain access to unoccupied sites. Additionally, the EAC associated with the site is unlikely to be zero which is the most

SVG241/07

CP1542  
CP Progression Paper

23 February 2021

Version 1.0

Page 3 of 13

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probable actual consumption value. This results in the energy volumes attributable to the Supplier in Settlement being overstated and inequitable.

## Issue 85

[Issue 85 'Removal of obligation to visit de-energised sites once every 12 months from BSCP504'](#) was raised by TMA on 27 August 2019.

During the BSC Audit 2018-2019, an issue was raised against a market participant for not visiting 11 out of the 25 sample de-energised sites, this led them to being non-compliant to obligation 3.4.1.1 footnote 99 of BSCP504:

"Where a SVA MS is de-energised the NHHDC shall make visits to the site concerned every 12 months."

The obligation for regular site visits was removed from the [Electricity Supplier Licence](#) obligations in 2016 by Ofgem as the Authority, because other obligations, such as Licence Condition 21B.4 would prompt the Supplier to use a risk based approach to ensure that sites are visited regularly enough to avoid health and safety issues.

Originally this obligation only applied to sites where no remote communication was available. The specific reference was removed by [CP1019 'Clarification of Pre-Payment Meter reading Obligations'](#) in 2005. However, the Issue 85 Proposer contended that it's unclear whether this License Condition applies to de-energised sites.

The non-compliances identified under the BSC Audit issue were due to a lack of Data Retrieval contract in place with Suppliers.

The Issue 85 Proposer wished to remove the obligation from BSCP504 for two reasons:

- The obligation is solely put on the NHHDC with no matching obligation on the Supplier, leaving Party Agents exposed to non-compliance; and
- The ability of the NHHDC to comply with this obligation is greatly impaired by accessibility to de-energised sites, pointing to the fact that this obligation is not the best way to ensure data accuracy from de-energised sites.

The Issue 85 Proposer outlined three solutions that were discussed with the Workgroup:

- The removal of the obligation for NHHDCs (and any other Party) to visit de-energised sites on an annual basis from BSCP504; (The Issue 85 Proposer's preferred option);
- Clarifying the responsibility of the NHHDC visiting de-energised sites annually directly in BSCP504 table step 3.4.1.1; or
- The obligation for NHHDCs to visit de-energised sites to be placed instead on the Supplier of a Metering System.

The Issue Group's discussions can be found in the Issue 85 Issue Report, which is Attachment D of this paper. This was presented to the BSC Panel at its meeting on [13 February 2020](#).

The Issue Group concluded that a Change Proposal be raised to amend BSCP502 and BSCP504 to remove the obligation on NHHDCs to visit de-energised sites annually and instead re-assign the obligation on the Supplier.

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SVG241/07

CP1542  
CP Progression Paper

---

23 February 2021

Version 1.0

---

Page 4 of 13

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The Issue Group was also in agreement that the table in 3.4.1 in BSCP504 should be rearranged so that important information in the footnote should be inserted into the main table.

### Proposed solution

Transfer the obligation in [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) to visit de-energised sites on an annual basis from Non Half Hourly Data Collectors (NHHDCs) to Suppliers. For consistency, the [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) obligation for HHDCs (Half Hourly Data Collectors) to visit de-energised sites will also be placed on Suppliers so that both the Non Half Hourly (NHH) and Half Hourly (HH) markets are aligned.

Also, as agreed by the Issue 85 Workgroup, rearrange the table in section 3.4.1 in BSCP504 to incorporate the important information in footnote 99 into the table. This would align with the approach in BSCP502 for Half Hourly.

### Proposer's rationale

Raising a Change Proposal to place the obligation on Suppliers for de-energised sites to be visited on an annual basis was the agreed solution of the Issue 85 Workgroup and this was presented to the BSC Panel at its meeting on 13 February 2020. Suppliers have contact with the customer and are best placed to decide when visits should be conducted.

### Proposed redlining

The proposed redlining to [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) for this CP1542 can be found in Attachments B and C of this paper.

## 4 Impacts and Costs

### BSC Party & Party Agent impacts and costs

CP1542 will impact Suppliers, HHDCs and NHHDCs.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	The obligation to visit de-energised sites will transfer to Suppliers from HHDCs and NHHDCs
HHDCs	The obligation to visit de-energised sites will transfer from HHDCs to Suppliers
NHHDCs	The obligation to visit de-energised sites will transfer from NHHDCs to Suppliers

Although the obligation is transferring from Data Collectors to Suppliers, it's likely that Data Collectors will still be instructed to visit the de-energised site. However, as the Supplier has the relationship with the customer, it should mean that more sites can be visited thus having a positive impact on the integrity of settlement.

### Central impacts and costs

#### Central impacts

CP1542 requires changes to [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#) and [BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#). There are no system impacts.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none"><li>BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'</li><li>BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'</li></ul>	<ul style="list-style-type: none"><li>None</li></ul>

#### Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
We would expect a positive impact from CP1542, as more sites will be visited, which would mean more errors would be identified. This will have a positive impact on the integrity of data entering settlement.
We would expect a positive impact on <a href="#">016 SVA Risk: Energisation Status incorrect</a> as site visits will check and confirm that a site is de-energised.

SVG241/07

CP1542  
CP Progression Paper

23 February 2021

Version 1.0

Page 7 of 13

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## Central costs

The central implementation costs for CP1542 will be <£1k. This is a document only change requiring amendments to two Code Subsidiary Documents (CSDs).

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SVG241/07

CP1542  
CP Progression Paper

---

23 February 2021

---

Version 1.0

---

Page 8 of 13

---

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## 5 Implementation Approach

### Recommended Implementation Date

This CP is recommended for implementation on 24 February 2022 as part of the February 2022 BSC Release.

This approach should allow sufficient time between approval and implementation of the CP for Suppliers and Data Collectors to make changes to their processes and to contracts and contractual arrangements, if required.

We are seeking market participants' views on this through the CP consultation period.

## 6 Proposed Progression

### Progression timetable

The table below outlines the proposed progression plan for CP1542:

Progression Timetable	
Event	Date
CP Progression Paper presented to SVG for information	2 March 2021
CP Consultation	8 March 2021 – 6 April 2021
CP Assessment Report presented to SVG for decision	4 May 2021
Proposed Implementation Date	24 February 2022 (February 2022 BSC Release)

### CP Consultation questions

We intend to ask the standard CP Consultation questions for CP1542. We do not believe any additional questions need to be asked for this CP.

Standard CP Consultation Questions
Do you agree with the CP1542 proposed solution?
Do you agree that the draft redlining delivers the CP1542 proposed solution?
Will CP1542 impact your organisation?
Will your organisation incur any costs in implementing CP1542?
Do you agree with the proposed implementation approach for CP1542?

## 7 Recommendations

We invite you to:

- **NOTE** that CP1542 has been raised;
- **NOTE** the proposed progression timetable for CP1542; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.

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SVG241/07

CP1542  
CP Progression Paper

---

23 February 2021

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Version 1.0

---

Page 11 of 13

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## Appendix 1: Glossary & References

### Acronyms

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

Acronyms	
Acronym	Definition
AA	Annualised Advance
BSC	Balancing and Settlement Code
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
CSD	Code Subsidiary Document
DC	Data Collector
EAC	Estimated Annual Consumption
HH	Half Hourly
HHDC	Half Hourly Data Collector
LDSO	Licensed Distribution System Operator
NHH	Non Half Hourly
NHHDC	Non Half Hourly Data Collector
SMRS	Supplier Meter Registration Service
SVA	Supplier Volume Allocation

### 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 Links		
Page(s)	Description	URL
2, 6, 7	BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	<a href="https://www.elexon.co.uk/csd/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/">https://www.elexon.co.uk/csd/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/</a>
2, 3, 6, 7	BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	<a href="https://www.elexon.co.uk/csd/bscp504-non-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/">https://www.elexon.co.uk/csd/bscp504-non-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs/</a>
2, 4	Issue 85 'Removal of obligation to visit de-energised sites once every 12 months from BSCP504'	<a href="https://www.elexon.co.uk/smg-issue/issue-85/">https://www.elexon.co.uk/smg-issue/issue-85/</a>

SVG241/07

CP1542

CP Progression Paper

23 February 2021

Version 1.0

Page 12 of 13

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External Links		
Page(s)	Description	URL
3	Electricity Supply Licence	<a href="https://www.ofgem.gov.uk/publications-and-updates/standard-conditions-electricity-supply-licence">https://www.ofgem.gov.uk/publications-and-updates/standard-conditions-electricity-supply-licence</a>
3	BSC Section X, Annex X-1 'General Glossary'	<a href="https://www.elexon.co.uk/the-bsc/bsc-section-x-annex-x-1-general-glossary/">https://www.elexon.co.uk/the-bsc/bsc-section-x-annex-x-1-general-glossary/</a>
4	CP1019 'Clarification of Pre-Payment Meter reading Obligations	<a href="https://www.elexon.co.uk/change-proposal/cp1019-clarification-of-pre-payment-meter-reading-obligations/">https://www.elexon.co.uk/change-proposal/cp1019-clarification-of-pre-payment-meter-reading-obligations/</a>
7	016 SVA Risk: Energisation Status incorrect	<a href="https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/016-sva-risk-energisation-status-incorrect/">https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/016-sva-risk-energisation-status-incorrect/</a>

SVG241/07

CP1542  
CP Progression Paper

23 February 2021

Version 1.0

Page 13 of 13

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