

CP Assessment Report

CP1543 'Use of DTC dataflow D0051 in the Half Hourly sector'

ELEXON



Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Reject

Implementation Date

24 February 2022
(February 2022 Release)



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About This Document

This document is the second Change Proposal (CP) Assessment Report for CP1543 which Elexon will present to the SVG at its meeting on 7 September 2021. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to reject CP1543.

There are three 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 Consultations.
- Attachment A contains the proposed redlined changes to deliver the CP1543 solution.
- Attachment B contains the full responses received to the second CP Consultation.

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Why change?

There is currently no prescribed mechanism for Half Hourly Data Collectors (HHDCs) to inform a Supplier, via a dataflow, how they retrieve consumption data. This process currently relies on bilateral discussions between HHDCs and Suppliers rather than a consistent Industry-wide process. This can result in Suppliers having different processes if they appoint multiple HHDCs, increasing the manual effort required to manage their portfolio.

Without receipt of a [D0051 \(Affirmation of Half Hour Data Retrieval Method and Associated Details\)](#), Suppliers are reliant on informal methods of communication to understand if a Meter can be dialled remotely or not.

Solution

This CP originally proposed to update [BSCP502 \(Half Hourly Data Collection for SVA Metering Systems Registered in SMRS\)](#) Clauses 3.2.1.4, 3.2.3.3, 3.2.4.6, 3.2.7.7, 3.3.1.3, 3.3.11.2 and 3.3.12.2 to require HHDCs to send a D0051 flow in response to a [D0155 \(Notification of Meter Operator or Data Collector Appointment and Terms\)](#).

Following industry consultation responses we updated BSCP502 to send a D0051 flow in response to a [D0268 'Half Hourly Meter Technical Details'](#).

Impacts and costs

The CP impacts Suppliers and HHDCs. Consultation respondents confirmed process and system changes would be required to implement the solution.

The CP will require changes to BSCP502. No central system changes or impact on BSC Agents are anticipated.

The central implementation costs for this CP will be less than £1k to implement the relevant document changes.

Implementation

The CP was originally proposed for implementation on 4 November 2021 as part of the November 2021 [BSC Release](#), however as part of the re-consultation we proposed an updated implementation date of 24 February 2022 as part of the February 2022 BSC Release in order to give Parties a sufficient window to implement any system or process changes. Both Elexon and the proposer recommend the CP is rejected and therefore should not be included in any upcoming releases.

Recommendation

We invite the **SVG** to:

- **REJECT** the proposed changes to BSCP502 for CP1543; and
- **REJECT** CP1543.

2 Why Change?

What is the issue?

There is currently no prescribed mechanism for HHDCs to inform a Supplier, via a dataflow, how they retrieve consumption data. This process currently relies on bilateral discussions between HHDCs and Suppliers rather than a consistent Industry-wide process.

Without receipt of a D0051, Suppliers are reliant on informal methods of communication to understand if a Meter can be dialled remotely or not. Although not prescribed in BSCP502 some HHDCs will send a D0051 as part of the appointment process currently, but it is not an existing requirement for all to do this. This can result in Suppliers having different processes if they appoint multiple HHDCs, increasing the manual effort required to manage their portfolio.

Background

Suppliers appoint HHDCs as part of the registration process for onboarding customers to their portfolio. On appointing a HHDC the Supplier is obliged to inform the agent of its chosen data Retrieval Method via Data Transfer Catalogue (DTC) dataflow D0155. The HHDC will accept the appointment via a [D0011 \(Agreement of Contractual Terms\)](#) or reject via a [D0261 \(Rejection of Agent Appointment\)](#), however it is not currently acknowledged that the Retrieval Method has been noted, validated and implemented, which means Suppliers need to rely on informal communications to confirm with the HHDC if a Meter cannot be dialled remotely.

By putting an obligation on the HHDC to confirm the Retrieval Method this would obligate the HHDC to obtain reads or give the Supplier notification they can't do it.

DTC dataflow D0051 provides this affirmation although BSCP502 is currently silent on its application.

Overview of Initial Consultation Responses

CP1543 was sent for a second Industry Consultation following material changes made to the solution by the proposer following the initial Consultation.

Seven responses were received to the initial CP1543 Consultation, with all respondents representing either a Supplier or HHDC. Within the responses 4 Parties suggested the placement of the D0051 following a D0155 was illogical and a better solution would be to for the flow to be sent after a D0268 has been received as the MTDs give the required detail to populate the data.

Following review with the proposer they agreed this was a better solution, noting sending the D0051 after a D0155 only gives you a point in time view and the value to this CP can be realised by confirming the Retrieval Method at each stage MTDs are updated.

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Updated Solution

Following Industry consultation feedback we have updated the solution to send a D0051 dataflow in response to a D0268. The original solution coupled HHDCs sending D0051's with a [D0012 'Confirmation of the Inclusion of the Metering Point in the Reading Schedules'](#), this has been decoupled as part of the updated redlining and additional requirements added to the following clauses where a D0268 is received by the Supplier: 3.2.1.4, 3.2.4.5, 3.2.5.3, 3.2.7.6, 3.2.8.6, 3.3.1.3, 3.3.6.6, 3.3.9.2 and 3.3.10.6. The updated redlining also no longer contains clauses where no D0268 is sent in the BSCP502 section.

The CP originally proposed to update BSCP502 Clauses 3.2.1.4, 3.2.3.3, 3.2.4.6, 3.2.7.7, 3.3.1.3, 3.3.11.2 and 3.3.12.2 to require HHDCs to send a D0051 flow in response to a D0155.

Given the scale of change to the original solution we believe this to have a material impact on participants who responded to the original consultation and therefore we believe a second consultation period is required.

There is no requirement for a cross code change as the D0051 flow is already available to be sent from HHDCs to Suppliers in the DTC Catalogue.

We reviewed all instances where a D0268 is sent in BSCP520 and have updated the redlining as below:

BSCP502 D0268 Clauses			
Clause	Section	Redlining Updated?	Logic
3.2.1.3	New connection or Registration Transfers from CMRS to SMRS - metered supply	Yes	We have separated out from D0012 and linked to the receipt of D0268 as opposed to D0155
3.2.4.4	Change of HHDC for an existing SVA Metering System.	Yes	We have separated out from D0012 and linked to the receipt of D0268 as opposed to D0155
3.2.5.2	Change of MOA (no change of SVA Metering System).	New	New instance of D0268 received so D0051 required as Retrieval Method potentially updated
3.2.7.5	Concurrent Change of Supplier and HHDC for an existing SVA Metering System.	Yes	We have separated out from D0012 and linked to the receipt of D0268 as opposed to D0155
3.2.8.5	Change of Supplier – No Meter	New	The clause has been added as in some instances a D0268 will be sent where there is No Meter. As the D0051 is linked to the sending of a D0268, if the MTDs are not received there will be no requirement to send the D0051 either.

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BSCP502 D0268 Clauses			
Clause	Section	Redlining Updated?	Logic
3.3.1.2	Coincident Change of Measurement Class from NHH to HH and Change of Supplier for HHDC-serviced Metering Systems.	Yes	We have separated out from D0012 and linked to the receipt of D0268 as opposed to D0155
3.3.6.5	Reconfigure or Replace SVA Metering System - No Change of Measurement Class for HHDC-serviced Metering Systems	New	New instance of D0268 received so D0051 required as Retrieval Method potentially updated
3.3.9.1	Change of Feeder Status – Energise Feeder	New	New instance of D0268 received so D0051 required as Retrieval Method potentially updated
3.3.10.5	Change of Feeder Status – De-energise Feeder	New	New instance of D0268 received so D0051 required as Retrieval Method potentially updated
3.4.3.11	HH Metering System investigation process	New	New instance of D0268 received so D0051 required as Retrieval Method potentially updated
3.5.1.1 - 3.5.4.1	Proving of a Metering System by Method 1 - 4	No	Not required for this process

Elxon consider this to be a material change to the solution for the following reasons:

- Not all consultation respondents suggested the CP be updated and were happy with the original solution.
- The updated redlining has created new clauses within BSCP502 that were not included in the original solution.
- Clauses 3.2.3.3, 3.3.11.2 and 3.3.12.2 that were included in the original solution have now been removed.

Proposer's rationale

Putting an obligation on the HHDC to confirm the Retrieval Method will ensure Suppliers are aware of how consumption data is retrieved. This could lead to potentially improved SF Settlement performance; as the Supplier will be able to put in place appropriate measures to obtain consumption data if they are aware their originally requested Retrieval Method is not available.

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4 Impacts and Costs

BSC Party & Party Agent impacts and costs

CP1543 impacts Suppliers and HHDCs. Consultation respondents confirmed process and system changes would be required to implement the solution.

Initial Consultation responses to impacts and costs

Four consultation respondents identified costs would be required to implement CP1543, and these were described as one-off and low or minor. No monetary values were provided.

Second Consultation responses to impacts and costs

Five consultation respondents identified costs would be required to implement CP1543, and these were described as little or minor. No monetary values were provided.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Process and System changes may be required to implement the solution.
HHDC	

Central impacts and costs

This CP will require changes to BSCP502. No central system changes or impact on BSC Agents are anticipated.

The central implementation costs for this CP will be less than £1k to implement the relevant document changes.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP 502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	None

Impact on BSC Settlement Risks
<u>007 SVA Risk: Metered Data is not retrieved</u> It is anticipated that this CP will help to positively support potential solutions to this Settlement Risk by providing additional clarity around where Metered Data is not retrieved.

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5 Implementation Approach

Recommended Implementation Date

Following the initial consultation CP1543 was recommended for implementation on 24 February 2022 as part of the February 2022 BSC Release, however both Elexon and the proposer recommend the CP is rejected and therefore should not be included in any upcoming releases.

This CP was originally recommended for Implementation on 4 November 2021 as part of the November 2021 BSC Release. However, based on initial consultation feedback, we materially changed the redlining resulting in a recommendation to send CP1543 for re-consultation. Due to the timescales involved in re-consulting we did not believe a November 2021 release date is achievable, and therefore recommended the Implementation date be changed to 24 February 2022 as part of the February 2022 BSC Release.

6 Initial Committee Views

SVG Assessment Report views – July 2021

The SVG considered the CP1543 Assessment report at its [meeting on 6 July 2021](#). The SVG agreed with the following recommendations:

- **AGREED** the amendments to the proposed redlining for BSCP502 for CP1543 made following the CP Consultation; and
- **AGREED** that CP1543 be re-published for a second industry consultation phase due to material changes to the solution following the first industry consultation phase.

SVG's initial views – April 2021

The SVG considered CP1543 at its [meeting on 6 April 2021](#). The SVG unanimously agreed to progress the CP to the Consultation phase.

An SVG member stated the sending and receipt of a D0051 is covered in the [MRA Golden Threads](#), meaning parties should be able to process the dataflow.

7 Industry Views – Second Consultation

This section summarises the responses received to the second CP Consultation. You can find the full responses in Attachment B. The responses to the initial consultation are summarised in the 'Why Change?' section of this document, and can be found in full in the initial CP1543 Assessment Paper located on the [CP1543 webpage](#).

Summary of CP1543 CP Consultation Responses

Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1543 proposed solution?	3	3	0	0
Do you agree that the draft redlining delivers the intent of CP1543?	3	3	0	0
Will CP1543 impact your organisation?	5	1	0	0
Will your organisation incur any costs in implementing CP1543?	5	1	0	0
Do you agree with the proposed implementation approach for CP1543?	4	2	0	0
Do you have any further comments on CP1543?	0	6	-	-

Consultation Overview

Six responses were received to the second Consultation for CP1546, five respondents represented Supplier Agents as well as one Supplier. All Supplier Agents confirmed they would be impacted and costs, although not stated, would be incurred to make process and system changes in order to implement CP1546.

Solution

Half of respondents indicated they still did not agree with the updated solution to CP1543 despite initial consultation responses indicating this may gather more support if the trigger for sending a D0051 was moved from the D0155 to D0268. Respondents felt the solution still only reflects a snapshot of the Retrieval Method and the proposed solution may result in an excess number of the D0051 flows which would nullify any potential useful information Supplier might hope to obtain from their receipt. Respondents also confirmed, as with the first consultation, that there are existing dataflows that can be used in combination to identify the current Retrieval Method and an additional obligation is not required.

Proposer's Recommendation

Following discussion with the Proposer they recognise the CP has not connected with Industry as initially anticipated, and taking into account two consultation periods that have failed to garner majority support from respondents despite the change in solution, have agreed with Elexon's view that CP1543 should be rejected. They advised they may seek to discuss concerns with respondents in appropriate Industry forums to better understand their reluctance to approve the CP and propose an alternative CP in the future if an appropriate mutual solution can be found.

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8 Recommendations

We invite the **SVG** to:

- **REJECT** the proposed changes to BSCP502 for CP1543; and
- **REJECT** CP1543.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
CP	Change Proposal
CPC	Change Proposal Circular
DTC	Data Transfer Catalogue
HHDC	Half Hourly Data Collector
SVG	Supplier Volume Allocation 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
D0011	Agreement of Contractual Terms
D0051	Affirmation of Half Hour Data Retrieval Method and Associated Details
D0155	Notification of Meter Operator or Data Collector Appointment and Terms
D0261	Rejection of Agent Appointment

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	BSCP502	https://www.elexon.co.uk/documents/bsc-codes/bscps/bscp502/
2	BSC Releases	https://www.elexon.co.uk/change/releases/the-release-and-implementation-process/
2,3,4	DTC Flows	https://dtc.mrasco.com/ListDataFlows.aspx
6	SVA Risk 007	https://www.elexon.co.uk/reference/performance-assurance/performance-assurance-processes/007-sva-risk-metered-data-is-not-retrieved/
7	SVG 245	https://www.elexon.co.uk/meeting/svg245/
7	SVG 242	https://www.elexon.co.uk/meeting/svg242/

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External Links		
Page(s)	Description	URL
7	MRA Golden Threads	http://cwgemserv.northeurope.cloudapp.azure.com/evolve/statics/yojd3o3x/index.html#/cwtype=single&cwview=diagram&lang=en&cwid=153
8	CP1543	https://www.elexon.co.uk/change-proposal/cp1543/

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