

CP Progression Paper

ELEXON



Committee

Supplier Volume Allocation Group (SVG)



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'Amendment of BSCP516 to clarify the criteria for Non-Domestic SVA Metering Systems to be allocated to Profile Classes 3 or 4'

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About This Document

This document provides information on a new Change Proposal (CP) 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 Supplier Volume Allocation Group (SVG) on 5 October 2021 to capture any comments or questions from Committee Members on this CP before we issue it for consultation.

There are three 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 CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP solution.

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1 Summary?

Why change?

In response to recent enquiries from Suppliers and other Parties, Elexon has been reviewing whether the criteria that Suppliers must follow when deciding whether to allocate Non-Domestic SVA Metering Systems to Profile Classes (PCs) 3 or 4¹ are clear.

Based on legal advice and external engagement, we have established that it is possible for a site to revert from Half Hourly (HH) to Non-Half Hourly (NHH) if it has been validly reclassified as being within PCs 3 or 4 and the Supplier is satisfied the customer meets the relevant criteria as set out in [BSCP516 'Allocation of Profile Classes and SSC's for Non Half Hourly SVA Metering Systems Registered in SMRS'](#).

Although the Balancing and Settlement Code (BSC) permits such a change, text included in BSCP516 suggests that such a change should not be carried out. This text was introduced by [CP1433 'Clarification of which Metering Systems are captured by the P272 requirements'](#), and was intended to explain the [P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'](#) requirement for HH Settlement of Advanced Meters. However, the text precludes a Change of Measurement Class from HH to NHH PCs 3 or 4; this interpretation does not align with the BSC.

Solution

This CP proposes to remove the text from BSCP516 that suggests a Change of Measurement Class from HH to NHH PCs 3 or 4 is not possible to ensure the procedure is aligned with the rules set out in [BSC Section L 'Metering'](#).

Impacts and costs

This CP is expected to impact Half Hourly Data Collectors (HHDCs), Non-Half Hourly Data Collectors (NHHDCs) and Suppliers.

This CP will only affect BSCP516, with no central system changes required.

The central implementation costs for this CP will be less than £1,000 to implement the relevant document changes.

Implementation

The CP is proposed for implementation on 24 February 2022 as part of the standard February 2022 BSC Release.

¹ Profile Class 3 - Non-Domestic Unrestricted Customers
Profile Class 4 - Non-Domestic Economy 7 Customers

2 Why Change?

What is the issue?

Text needs to be removed from BSCP516 that doesn't agree with the BSC text introduced by Modification P272. Removing this text will align the BSCP516 with the view that it is possible for a site to revert from HH to NHH if it is reclassified as PCs 3 or 4.

Further information

P272 Background

BSC Modification P272 was implemented on 1 April 2017. It required that Metering Systems within PCs 5-8 who have an Advanced Meter fitted as a result of [Supply Licence Condition \(SLC\) 12.18](#), must be settled using HH data.

Since the implementation of P272 Elexon has been approached by Suppliers and other Parties asking whether it is possible to reverse a migration carried out under P272. Essentially asking whether it is possible to move a Non-Domestic customer with an Advanced Meter who was migrated from PCs 5-8 to HH Settlement (as part of the P272 process) back to NHH Settlement in PCs 3 or 4. Initially, the advice provided by Elexon suggested that under the BSC, once migrated, it is not possible to revert back from being settled HH to NHH in PCs 3 or 4.

After reviewing the SLC, BSC and associated procedures, Elexon recognised that its former position is not aligned with the correct interpretation of the BSC. Elexon agreed that reverting to NHH should be possible under the P272 legal text. Where a customer has had an Advanced Meter installed in accordance with SLC12.17-18, but the Metering System now meets the conditions for PCs 3 or 4 in BSCP516, the Supplier can revert the Metering System back to NHH Settlement. On [June 7 2021](#) a communication was issued to confirm that a site is permitted to return to being NHH settled if it is validly reclassified as PCs 3 or 4.

BSCP516 Text

However, text in BSCP516 does not align with this view. BSCP516 states that, "From 1 April 2017 non-domestic customers with an Advanced Meter for Import fitted in accordance with the requirements of SLC 12.17-12.22 of the Electricity Supply Licence are mandated to be settled on a HH basis and should not be registered under PCs 5-8 using this BSC Procedure. For the avoidance of doubt once an Advanced Meter has been fitted in accordance with the SLC then that Metering System is mandated to be settled on a HH basis from 1 April 2017." The last sentence here appears to suggest that reverting back to NHH Settlement is not possible.

Nevertheless, the P272 legal text and the P272 Final Modification Report do not support this hard-line interpretation. The P272 Final Modification Report suggests that it is possible to revert to NHH Settlement in circumstances where a Metering System was previously assigned to PCs 5-8, and subsequently migrated to HH Settlement, but now meets the criteria for PCs 3 or 4 in BSCP516, as it states, "once P272 has been implemented, a PC 5-8 Metering System settled HH would only be able to revert to NHH if it was validly reclassified as being within PCs 1-4 (in accordance with BSCP516)."

The P272 legal text is consistent with this view as BSC L2.2.2 states that where a Supplier is required to supply electricity through an Advanced Meter, it shall be HH Metering Equipment (i.e. settled HH). "Advanced Meter" here means Metering Equipment installed

in accordance with the obligation set out in SLC12.18. The SLC12.18 applies where the metering point falls within PCs 5-8 as defined in the BSC. This suggests that where a customer has had an Advanced Meter installed in accordance with SLC12.17-18, but the Metering System now meets the conditions for PCs 3 or 4 in BSCP516, the Supplier can revert the Metering System to NHH Settlement (in PCs 3 or 4).

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Proposed solution

This CP proposes to remove the text *'For the avoidance of doubt once an Advanced Meter has been fitted in accordance with the SLC then that Metering System is mandated to be settled on a Half-Hourly basis from 1 April 2017'* from BSCP516 so that it aligns with the correct interpretation of the rules set out in the BSC.

Proposer's rationale

The amendment to BSCP516 will ensure that it aligns with the view that a change of Measurement Class and Profile Class (from HH settled to NHH PC 3 or 4) is permitted by the BSC if a Metering System has been validly reclassified as being within PCs 3 or 4.

Proposed redlining

The proposed redlining to BSCP516 for this CP can be found in Attachment B of this paper.

4 Impacts and Costs

BSC Party & Party Agent impacts and costs

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
HHDC	This change will clarify to Parties that reverting from HH to NHH is possible under P272 if a Metering System has been validly reclassified.
NHHDC	
Suppliers	

Central impacts and costs

Central impacts

This CP will only affect BSC documentation, it requires removing a statement in BSCP516. No BSC Central Systems will be impacted.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP516	<ul style="list-style-type: none">None

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
Elxon anticipate no impact on Settlement Risks associated with this change.

Central costs

The central implementation costs for this CP will be less than £1000.

5 Implementation Approach

Recommended Implementation Date

This CP is recommended for implementation on 24 February 2022 as part of the standard February 2022 BSC Release to ensure the change is implemented at the earliest opportunity.

6 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for the CP:

Progression Timetable	
Event	Date
CP Progression Paper presented to SVG for information	5 Oct 2021
CP Consultation	11 Oct 2021 – 5 Nov 2021
CP Assessment Report presented to SVG for decision	7 Dec 2021
Proposed Implementation Date	24 Feb 2022 (Feb 2022 Release)

CP Consultation questions

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

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

7 Recommendations

We invite you to:

- **NOTE** the proposed progression timetable for the CP; and
- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation.
- **NOTE** that the CP will be presented to:
 - the SVG on 5 October 2021.

Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSC	Balancing and Settlement Code
CP	Change Proposal
CPC	Change Proposal Consultation
HH	Half Hourly
NHH	Non Half Hourly
PC	Profile Class
SLC	Supply Licence Condition
SVG	Supplier Volume Allocation Group

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	BSCP516 'Allocation of Profile Classes and SSC's for Non Half Hourly SVA Metering Systems Registered in SMRS'	https://www.elexon.co.uk/csd/bscp516-allocation-of-profile-classes-and-sscs-for-non-half-hourly-sva-metering-systems-registered-in-smrs/
2	CP1433 'Clarification of which Metering Systems are captured by the P272 requirements'	https://www.elexon.co.uk/change-proposal/cp1433/
2	P272 'Mandatory Half Hourly Settlement for Profile Classes 5-8'	https://www.elexon.co.uk/mod-proposal/p272-mandatory-half-hourly-settlement-for-profile-classes-5-8/
2	BSC Section L 'Metering'	https://www.elexon.co.uk/the-bsc/bsc-section-l-metering/
3	Supply License Condition	https://www.ofgem.gov.uk/sites/default/files/docs/2020/07/electricity_supply_standard_license_conditions.pdf

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External Links

Page(s)	Description	URL
3	June 7 th Communication 'Clarification of criteria for Non-Domestic SVA Metering Systems to be allocated to Profile Classes 3 or 4'	https://www.elexon.co.uk/article/clarification-of-criteria-for-non-domestic-sva-metering-systems-to-be-allocated-to-profile-classes-3-or-4/

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