

CP Assessment Report

CP1546 'Introducing DTC flows to transfer UMS Summary Inventories and Control files'

ELEXON



Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

30 June 2022
(June 2022 Release)



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About This Document

This document is the Change Proposal (CP) Assessment Report for CP1546 which Elexon will present to the SVG at its meeting on 5 October 2021. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1546.

There are six 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.
- Attachments A-D contain the proposed redlined changes to deliver the CP1546 solution.
- Attachment E contains the full responses received to the CP Consultation.

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1 Summary

Why change?

Unmetered Supplies Operators (UMSO) are currently unable to use automated processes to send Unmetered Supplies (UMS) inventory data to Meter Administrators (MA). With the implementation of Market-wide Half Hourly Settlement (MHHS) the volume of files to be transferred will increase significantly, this CP intends to align the HH process with NHH.

Solution

The CP1546 solution will introduce two new dataflows to be sent over the Data Transfer Service (DTS). The two dataflows will be a combined Summary Inventory and Central Management System (CMS) Control File, sent from the UMSO to MA, and a UMS Response which would be sent from the MA to the UMSO to confirm successful processing or rejection.

Impacts and costs

UMSOs and MAs will be required to update their systems to process the new messages as per the updated [BSCP520](#) 'Unmetered Supplies Registered in Supplier Meter Registration Service (SMRS)'.

The central costs to Elexon will be less than £1000.

Implementation

This change is recommended for implementation 30 June 2022 as part of the standard June 2022 BSC Release.

Recommendation

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1546 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP520 for CP1546; and
- **APPROVE** CP1546 for implementation on 30 June 2022 as part of the standard June 2022 Release.



Summary Inventories and CMS Control Files

The process of establishing inventory and control files as set out in BSCP520

What is the issue?

UMS inventories contain the details of UMS apparatus connected to the distribution network. This data is passed from the customer to the UMSO. The UMSO summarises this data and passes it to the MA.

BSCP520 requires the passing of Summary Inventories and Central Management System (CMS) Control Files by electronic, or by other agreed method. This process does not support efficient automation through the use of a data flow.

There is currently no method for automated communication of these files for existing Half Hourly Metering System Identifiers (MSIDs), and email is often used to transmit the files, this CP intends to align the HH process with NHH.

Background

The numbers of UMS Half Hourly MSIDs has increased in recent years, including more recently as a result of the [March 2020 Panel meeting 300](#) decision in respect in over 100kW unmetered supplies, where the BSC Panel agreed that Suppliers and UMSOs identify all the over 100kW unmetered supplies and put in place an action plan to migrate those supplies to half hourly settlement with a backstop of April 2021, including a robust strategy for communicating with customers.

The number of updated Summary Inventories and CMS Control Files has increased for all UMS customers as they upgrade and improve the efficiency of the unmetered equipment. Averaging at 10-11 updates per MSID per year, with several hundred Half Hourly MSIDs, and nearly 30,000 Non Half Hourly (NHH) MSIDs per year.

The transition to MHHS arrangements will further lead to increased number of MSIDs trading HH, with initial estimates suggesting this will increase by over 50%. This change is intended to future proof the passing of Inventory data from the UMSO to the MA (Unmetered Supplies Data Service (UMSDS) under MHHS).

The Unmetered Suppliers User Group ([UMSUG](#)), and a sub-group has considered this issue. At its meeting in December 2020, the UMSUG agreed to recommend to the Supplier Volume Allocation Group (SVG) that a BSC Change Proposal (CP) be raised to implement a revised approach to the interface for provision of this data. Elexon are raising the Change Proposal (CP) on behalf of UMSUG [who have reviewed the draft dataflows](#).

Proposed solution

UMSUG recommended that two new dataflows should be sent over the DTS:

- A combined Summary Inventory and Central Management System (CMS) Control File, sent from the UMSO to MA; and
- A UMS Response which would be sent from the MA to the UMSO to confirm successful processing or rejection.

Associated changes to BSCP520 will be required to support the use of the new dataflows and remove redundant text.

This change will also reinstate the footnote to the bottom of section 3.11.4 which had previously been deleted as a manifest error in CP1536.

Proposer's rationale

The proposer has outlined the following potential benefits that the CP is expected to bring:

- Utilise the DTS as a secure, confidential and auditable communication method;

An increasing number of large lighting authorities are using CMS equipment which requires the use of the CMS Control file. This can be from a few thousand to 150,000 rows long, which becomes a significant sized email. Whilst the information is not currently regarded as personal, using a formal industry recognised data exchange is more secure and auditable, in the event of data loss between parties.

- Automate the processing of information;

Automation of the data processing enables reduced staff involvement and more consistent data provision. It also allows for faster exchange of information allowing staff to focus on resolving exceptions rather than the routine tasks.

- Improve the consistency and accuracy of information exchanges;

The DTS enables automation of generation and receipt of data. Emails tend to require human intervention which is prone to error and omission.

- Support the future increase in numbers of Half-Hourly (HH) Meter Point Administration Numbers (MPANs);

The numbers of UMS Half hourly MPANs has increased in recent years including as a result of the [March 2020 Panel meeting 300](#) decision in respect in over 100kW unmetered supplies, where the BSC Panel agreed that Suppliers and UMSOs identify all the over 100kW unmetered supplies and put in place an action plan to migrate those supplies to half hourly settlement with a backstop of April 2021, including a robust strategy for communicating with customers.

The number of updated Summary Inventories and CMS Control Files has increased for all UMS customers as they upgrade and improve the efficiency of the unmetered equipment. Averaging at 10-11 updates per MSID per year, with several hundred HH MSIDs, and nearly 30,000 NHH MSIDs per year.

The transition to Market-wide Half Hourly Settlement (MHHS) arrangements (if progressed) will lead to increased number of MSIDs trading HH. This change is intended to future proof the passing of Inventory data from the UMSO to the MA (future Unmetered Supplies Data Service (UMSDS)).

- Provide a positive acknowledgment that the inventory has been processed or rejected, with reasons;

The larger UMSOs are using systems which are already able to send/receive flows for the Non-Half Hourly (NHH) market across the DTS, modifying the system to send/receive for the HH market is a natural extension. An automated response flow will be able to highlight reasons for rejection.

Governance

As the Master Registration Agreement (MRA) is transitioning into the Retail Energy Code (REC) the drafting of the dataflows will be consulted on through the BSC consultation for this CP, with approval coming after 1 September 2021 (post REC go-live). As the BSC CP will be approved after 1 September 2021, Genserv will be able to use the BSC approval (subject of course to the CP being approved) as the mandate to implement the dataflows by the approved BSC CP Implementation Date.

4 Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

CP Consultation respondents noted system changes would be required to implement the proposed changes for both UMISO's and MA's.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Unmetered Supplies Operators	Costs and resources associated with system changes required to automate file transfer.
Meter Administrators	Costs and resources associated with system changes required to automate file transfer.

Participant costs

Six consultation respondents noted costs would be incurred as a result of the change, noting testing and development costs as well as training and operational procedure updates. No monetary values were provided.

Central impacts and costs

Central impacts

This change will require changes to the process and definitions set out in BSCP520, and will require a DTC change to be implemented under REC governance.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP520	None

Central costs

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

5 Implementation Approach

Recommended Implementation Date

CP1546 was originally recommended for implementation 24 February 2022 as part of the February 2022 BSC Release, in order to give Parties time to implement associated required system changes. Following consultation responses the majority of participants requested a delay to this date to **30 June 2022** in order to give more time to develop and test the system changes required to implement the solution.

6 Initial Committee Views

SVG's initial views

The SVG considered CP1546 at its [meeting on 6 July 2021](#).

An SVG member questioned the wording of the Progression Paper and that dataflows are not mandatory, Elexon agreed with this and removed the wording from the Consultation document, the redlining in BSCP520 does not differentiate the solution to any other dataflows that are required to be sent or received within the BSC.

7 Industry Views

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

Summary of CP1546 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1546 proposed solution?	8	0	0	0
Do you agree that the draft redlining delivers the intent of CP1546?	6	1	0	1
Will CP1546 impact your organisation?	7	1	0	0
Will your organisation incur any costs in implementing CP1546?	6	2	0	0
Do you agree with the proposed implementation approach for CP1546?	3	5	0	0
Do you have any further comments on CP1546?	5	3	-	-

Consultation Overview

We received eight responses to CP1546, four from Distributors, two from Meter Administrators, one from a Supplier and one from an UMSO system provider. All respondents were in favour of progressing CP1546 and agreed with the proposed solution, with all respondents, excluding the Supplier, being impacted by the change. Six respondents noted costs would be incurred as a result of the change, noting testing and development costs as well as training and operational procedure updates.

Implementation Date

Five respondents disagreed with the proposed implementation date of February 2022, respondents stated this was linked to not having enough time to develop and test the system updates required to make the change. The UMSO system provider confirmed they could meet June 2022 to implement the proposed changes, although one respondent stated they could not meet a June release due to resources focussed on Faster Switching. The revised BSCP520 allows existing email arrangements to remain in place between UMSO and MA so we feel this allows a June release to be suitable in line with the majority of respondents' views.

Comments on the proposed redlining

We received a number of comments from an UMSO system provider, following a call with the respondent it was agreed the majority of these points were clarifications and updates were not required unless otherwise stated in the below table.

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Comments on the CP1546 Proposed Redlining		
Document & Location	Comment	Elaxon's Response
BSCP520 3.1 & 3.2 & 3.4 (e.g. 3.4.4/3.4.5)	Action columns need to be re-written to say 'send UMS Inventory' rather than using old language of CMS Control file/Summary Inventory file	Discussed with respondent – no update required.
BSCP520 4.8.1 EFD	<p>More broadly, The Effective From Date used in the UMS Inventory Data Flow should be the later of</p> <ul style="list-style-type: none"> The EFD of the Inventory The market participants' registration to the MPAN <p>Otherwise it can't be used as intended to signify that the inventory has changed from a specified date.</p> <p>Alternatively could just make it the</p> <ul style="list-style-type: none"> The EFD of the Inventory <p>and leave the MA to work out how that affects them? [however, your specified validation indicates that the MA must be the MA registered at the EFD so I can see you may want to keep as is]</p> <p>In any case, the definition of the EFD in the flow needs to reflect this use of MA registration date where that is later than the EFD of the inventory.</p>	Discussed with respondent – no update required.
BSCP520 4.8.1 Sending a change of Inventory to all affected MAs	<p>In the event that a (e.g. backdated) change of inventory is made which effects more than one MA, should all affected MAs receive the UMS Inventory flow. Presumably yes.</p> <p>Presumably each MA which has been responsible for the MPAN on or since the EFD of the Inventory change (including any MA which is known to be to commencing in the future) should receive the UMS Inventory flow and the EFD in the flow should be as per comment above.</p>	Discussed with respondent – no update required.

Comments on the CP1546 Proposed Redlining

Document & Location	Comment	Elaxon's Response
BSCP520 4.8.1 EFD	<p>Only one overall EFD is provided in the UMS Inventory flow</p> <p>Currently it is possible for each SubMeter to have its own EFD, e.g. you indicate in BSCP520 1.2.5.7 that MA should record EFD input to the Equivalent Meter level.</p> <p>Similarly, a CMS control file is produced per SubMeter with its own specific EFD</p> <p>In the CMS Control file YYYYMMDD the effective from date will reflect the start date of the inventory change for the meter.</p> <p>Similarly we provide separate Summary Inventory files per non CMS Sub Meter with the effective from date of the meter's inventory in the filename.</p> <p>So our UMS solution provides the ability to manage SubMeter inventory independently whilst still being able to provide an overall EFD for the MSID.</p> <p>Given all this, please consider also having EFDs at the Sub Meter level too in the DTN flow.</p> <p>That would provide the ability for an UMISO to show that one SubMeter's inventory has changed but another hasn't.</p>	Discussed with respondent – no update required.
Flow Definition (and BSCP520 generally)	<p>Should mCMS be treated the same as CMS? (e.g. when populating UMS Inventory flow)</p> <p>The CMS Indicator Flag could potentially be used more profitably (and could be extended to other cases in future) e.g. to indicate</p> <p>N=Non CMS C=CMS M=mCMS</p>	Discussed with respondent – no update required.
BSCP520 4.6.3.3 Grouping of Controllers	<p>When grouping the Controller Devices for CMS Inventory you now introduce the 'ControllerXX' string. This limits the number of distinct</p>	Discussed with respondent – no update required.

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Comments on the CP1546 Proposed Redlining		
Document & Location	Comment	Elxon's Response
	<p>controller CCs to 99 which we would have to manage (however unlikely).</p> <p>What would we do if there were more than 99?</p> <p>Does this provide any real value to anyone given that the assignment of the number to a CC is arbitrary?</p> <p>We'd prefer to stick with the existing 'Control ' string.</p>	
BSCP520 4.8.2 CMS Unit Reference	<p>CMS Unit References are not supposed to start with H or T so that they are not confused with header and trailer records in the old CMS Control files.</p> <p>With the advent of the new DTN flows this limitation should be lifted.</p>	Discussed with respondent – no update required.
BSCP520 4.8.1 Inventory Sequence	<p>Inventory Sequence Numbers – The introduction of sequence numbers is often problematic.</p> <p>We presume that the MA is not expecting to receive contiguous sequence numbers (sequential with no gaps in the sequence) per MPAN or</p> <p>to expect the first UMS Inventory file that they receive for an MPAN to be 1 (a different MA may have received the first iteration).</p> <p>As a UMS system provider our inclination is to generate the number from a site-wide sequence number rather than a number tied to the MPAN / MA / Inventory EFD change iteration, so that we have the freedom to re-send a file (which failed at the MA) with a higher sequence number without having to change the inventory version artificially.</p> <p>Given that we might choose to implement that way, could the Integer be extended to INT(8) please.</p>	Discussed with respondent – no update required.

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Comments on the CP1546 Proposed Redlining		
Document & Location	Comment	Elaxon's Response
Flow Data Item Definition	Number of items – is INT(6) Could we increase to INT(8) here just to future proof.	Discussed with respondent – no update required.
BSCP520 1.2.5.1	'Sub-Meters for CMS equipment are denoted in lower case, non-CMS are denoted in upper case'. We have not seen or are aware this sort of case specific rule anywhere else in the industry. Is this important?	Discussed with respondent – no update required.
Flow Data Item Definition	Currently the CMS (GP4) and Non CMS(GP3) sections of the UMS Inventory flow are mandatory. (1-*) If we are setting the inventory to zero there won't be any rows to provide so these need to be optional. (0-*) and this case should be described in the flow definition.	Discussed with respondent – no update required.
BSCP520 1.2.5.1	"A Sub-Meter must be unique with an MSID." This is aiming to advise that where an individual MSID has multiple agreed Sub-Meters, then they need to be unique within that MSID. The same Sub-Meter value could be used against different MSIDs. This could be mis-interpreted, so we suggest changing this sentence to read: "Each Sub-Meter must be unique within an MSID."	Agree with comment – redlining updated
BSCP520 3.1.13	Add a footnote to this section, along the lines of: "Please refer to section 4.8.1 for additional rules around when the UMSO can send this flow, relating to the Effective From date of the inventory."	No material update to existing wording via the footnote. No updates made.
BSCP520 3.2.3	As per our note for 3.1.13	No material update to existing wording via the footnote. No updates made.
BSCP520 3.2.4	As there are now more reasons the MA may reject the UMS Inventory DXXXX Flow, change the statement	Agree with comment – redlining updated

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Comments on the CP1546 Proposed Redlining		
Document & Location	Comment	Elaxon's Response
	<p>which says the reasons for rejection are down to Charge Codes and/or Switch Regimes as follows:</p> <p>"Reject updated Summary Inventory and/or CMS Control File (as appropriate), listing invalid Charge Codes and/or Switch Regimes to the UMSO and continue to use or re-apply previous Summary Inventory and/or CMS Control File (as appropriate)."</p> <p>to:</p> <p>"Reject updated Summary Inventory and/or CMS Control File (as appropriate), listing invalid Charge Codes and/or Switch Regimes to the UMSO and/or reasons as detailed in section 4.8.2."</p>	
BSCP520 4.8.2	<p>"If any of the initial checks fail, then the Instruction Sequence Number will be marked for rejection, see Section 4.8.3."</p> <p>This is a typo, and should read as Inventory Sequence Number (not Instruction), so:</p> <p>"If any of the initial checks fail, then the Inventory Sequence Number will be marked for rejection, see Section 4.8.3."</p>	Agree with comment – redlining updated

8 Recommendations

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1546 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP520 for CP1546; and
- **APPROVE** CP1546 for implementation on 30 June 2022 as part of the standard June 2022 Release.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
CMS	Central Management Service
CP	Change Proposal
CPC	Change Proposal Consultation
DTS	Data Transfer Service
MA	Meter Administrators
MHHS	Market-wide Half Hourly Settlement
MPAN	Meter Point Administration Numbers
MSIDs	Metering System Identifiers
NHH	Non-Half Hourly
REC	Retail Energy Code
SMRS	Supplier Meter Registration Service
SVG	Supplier Volume Allocation Group
UMS	Unmetered Supplies
UMSO	Unmetered Supplies Operator
UMSUG	Unmetered Supplier User Group
USDS	Unmetered Supplies Data Service

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
D0new	UMS Inventory
D1new	UMS Response
Jnew	Charge Code

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.

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External Links		
Page(s)	Description	URL
2	BSCP520	https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/
3	March 2020 Panel Meeting 300	https://www.elexon.co.uk/meeting/bsc-panel-300/
3	UMSG website	https://www.elexon.co.uk/group/unmetered-supplies-user-group-umsug/
3	UMSO minutes	https://www.elexon.co.uk/documents/groups/umsug/umsug-2020/umsug130-01-new umso ma dtn flows/
7	SVG 245	https://www.elexon.co.uk/meeting/svg245/

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