ELEXON

CP Assessment Report

CP1552 ‘Reflecting BSCP501 timeframes in BSCP520 processes’

Contents

	About This Document	1
1.	Summary	3
2.	Why Change?	4
3.	Solution	5
4.	Impacts and Costs	7
5.	Implementation Approach	8
6.	Initial Committee Views	9
7.	Industry Views	10
8.	Recommendations	11
	Appendix 1: Glossary & References	12

Committee

Supplier Volume Allocation Group (SVG)

Recommendation

Approve

Implementation Date

30 June 2022

(June 2022 Release)

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SVG251

CP1552

CP Assessment Report

11 January 2022

Version 1.0

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About This Document

Not sure where to start? We suggest reading the following sections:

- Have 5 mins? Read section 1
- Have 15 mins? Read sections 1, 4, 5 and 6
- Have 30 mins? Read all sections
- Have longer? Read all sections and the annexes and attachments

This document is the Change Proposal (CP) Assessment Report for CP1552 which Elexon will present to the SVG at its meeting on 11 January 2022. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1552.

There are five 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 CP proposal form.

- Attachments B-C contain the proposed redlined changes to deliver the CP1552 solution.
- Attachment D contains the full responses received to the CP Consultation.

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1. Summary

Why change?

BSCP520 ‘Unmetered Supplies Registered in SMRS’ does not me for these processes are found in BSCP501 ‘Supplier Meter Registration Service’. However, as these processes are not reflected in BSCP520, there is a risk of market participants not fully understanding the expected timescales.

Solution

The proposed solution for this CP is to reflect the existing timeframe from BSCP501 section 3.3.1 (Update of SMRS Database by Suppler) in the relevant sections of BSCP520 to provide clarity to market participants.

Impacts and costs

This CP will impact Unmetered Supplies Operators (UMSOs), Suppliers and Supplier Meter Registration Agents (SMRAs).

This CP will impact BSCP520 and BSCP501, 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

This CP is recommended for implementation on 30 June 2022 as part of the standard June 2022 Balancing and Settlement Code (BSC) Release, as this is the next available release.

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2. Why Change?

What is the issue?

BSCP520 does not include timeframes for various Supplier obligations. At present, there is a risk that UMSOs may struggle to gain support and participation in these obligations from Suppliers, as it may not be clear that the BSCP501 timescales should apply to some of the processes in BSCP520.

Background

BSCP520 defines various activities specifically for UMS. Currently, UMSOs are having issues with Suppliers not completing several actions included in BSCP520 as there are no timeframes present for these actions in BSCP520, and it may not be clear to them that the timescales in BSCP501 should apply. The actions include sending a D0205 (Update Registration Details) to Energise or De-Energise a Meter Point Administration Number (MPAN), sending a D0386 (Manage Metering Point Relationships) to remove a related flag from a UMS MPAN as part of the faster switching process and sending a D0205 and a D0386 to disconnect UMS MPANs.

On the other hand, BSCP501 defines activities which enable the Supplier Meter Registration Service (SMRS) to fulfil its different functions. This document contains similar obligations to the ones found in BSCP520 and also includes the specific timeframe; “As soon as possible and in any event within 5 Working Days of (i) the effective date of the change; or (ii) receiving notification that a change is required if this occurs after the effective date of the change” in section 3.3.1. This timeframe can be used for several Supplier actions in BSCP520.

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3. Solution

Proposed solution

The proposed solution for this CP is to reflect the timeframe from BSCP501 section 3.3.1 in BSCP520:

- 'As soon as possible and in any event within 5 Working Days of
  - i. the effective date of the change; or
  - ii. receiving notification that a change is required if this occurs after the effective date of the change.'

The sections in BSCP520 that require updating are:

- 3.1 Establishment of a new UMS Inventory – section 3.1.23
- 3.2 Amendment to Inventory – section 3.2.11
- 3.7 Change of Energisation State of an MSID – section 3.7.3
- 3.7 Change of Energisation State of an MSID – section 3.7.9
- 3.8 Disconnection of an MSID – section 3.8.2

Footnotes will also be added to BSCP520 and BSCP501 to create a cross-reference between the documents. This will ensure there is both clarity for market participants in the reflected timescales, and also for future changes to ensure any amendments to either BSCP501 or BSCP520 are reflected between the documentation.

Proposer's rationale

Although market participants can look up the actions found in BSCP501 in BSCP520 to find out the specific timeframes, there is a risk that some Parties may not be aware of this. By reflecting the timeframe from BSCP501 in BSCP520 it will make it clear that these timeframes need to be followed.

This will allow UMSOs to gain participation in these obligations from Suppliers, as they will now have specific timeframes to refer to in BSCP520.

Prior industry engagement

This Change was presented to the Performance Assurance Board (PAB) at its meeting on 26 August 2021 (PAB247) as part of the Technical Assurance of Performance Assurance Parties (TAPAP) report recommendations. PAB members were concerned that adding timescales to BSCP520 would be unnecessary duplication, as the timescales were already outlined in BSCP501. Further, duplicating the timescales between documents risks the documents diverging if timescales were updated in the future.

When this Change was presented to the Unmetered Supplies User Group members (UMSUG) at its meeting on 22 September 2021 (UMSUG133), the members agreed with the PAB's comments regarding the solution. However, the UMSUG did raise the issue that they are having problems with Suppliers carrying out their obligations. The UMSUG noted

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that Supplier engagements can be disconnected and they can be waiting months for a flag removal request to be processed, as the Suppliers may be unaware of their responsibilities.

To address the concerns with the solution, Elexon has added footnotes in BSCP501 and BSCP520 to cross-reference the two documents. The footnotes note the intention to align the timeframes to help ensure changes to relevant timeframes in BSCP501 are also made to BSCP520. If there are any future changes, the footnotes clarify to Elexon that the other document must also be updated, and also ensures clarity for market participants in cross-referencing the documentation.

Proposed redlining

The CP proposes to update BSCP520 and BSCP501. The redlining to support this change can be found in Attachments B and C.

Furthermore, the following housekeeping change was made to BSCP520:

Section 3.8 had a footnote error as footnote number 6 was duplicated with two different statements. The second footnote has been renumbered to footnote 7.

Changes to the Redlining

The two footnotes that were duplicated from BSCP501 section 3.3.1 to BSCP520 as part of the solution for CP1552 has been removed upon discussion with the REC 3.0 team.

The two footnotes are:

- ‘The SMRA System must not preclude changes made by a Supplier before the Final Reconciliation Volume Allocation Run.’

- ‘If the effective date of the change is before the current effective date contained in the SMRS, the Supplier will determine whether or not to correct the error as required by the BSC.’

The footnotes were added to BSCP520 to duplicate the existing footnotes that were included in the BSCP501 timeframe. However, the BSCP501 changes for REC 3.0 will delete these footnotes and move their content to elsewhere in BSCP501. It is uncertain whether CP1552 will be implemented before or after REC 3.0, and removing the footnotes avoids any redlining conflict or need to delay implementation of CP1552.

These footnotes are also not directly relevant to UMS, as they relate to SMRA/SMRS obligations and are already covered in BSCP501 (the SMRS BSCP).

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4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	**Impact**
Suppliers	This Change will provide clarity for Parties about the timeframes for various processes in BSCP520.
SMRAs	
UMSOs	

Participant costs

Elexon does not anticipate any implementation costs to Parties, as the obligations are not changing. Also, no respondents to the consultation identified any costs. This CP is simply clarifying the timeframes for existing processes.

Central impacts and costs

Central impacts

Central Impacts	
Document Impacts	**System Impacts**
BSCP520 'Unmetered Suppliers Registered in SMRS' BSCP501 'Supplier Meter Registration Service'	None

Central costs

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

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5. Implementation Approach

Recommended Implementation Date

This change is recommended for implementation for 30 June 2022 as part of the standard June 2022 BSC Release. This is the next standard Release that this CP can be scheduled for, to ensure clarity for market participants.

Five respondents to the Consultation agreed with the proposed implementation approach for CP1552. One respondent commented that they were not sure.

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6. Initial Committee Views

SVG's initial views

The CP1549 Progression Paper (SVG 249/08) was presented to the SVG at its meeting on 2 November 2021. SVG had no comments on the CP or the timetable for progression.

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7. Industry Views

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

We received six responses to the CP1552 consultation, four were Distributors, one was a Meter Administrator and one was a Supplier. Five responses were in favour of progressing CP1552 and agreed with the proposed solution. One respondent was unsure about the proposed solution.

Summary of CP1552 CP Consultation Responses				
Question	**Yes**	**No**	**Neutral/No Comment**	**Other**
Do you agree with the CP1552 proposed solution?	5	-	-	1
Do you agree that the draft redlining delivers the intent of CP1552?	5	-	-	1
Will CP1552 impact your organisation?	2	4	-	-
Will your organisation incur any costs in implementing CP1552?	-	6	-	-
Do you agree with the proposed implementation approach for CP1552?	5	-	-	1
Do you have any further comments on CP1552?	1	5	-	-

Four of the respondents that agreed with the proposed solution all gave the general view that this CP will provide clarity to the obligations.

The respondent that was unsure about the proposed solution commented that they need confidence that these proposals do not conflict with other Changes. We clarified to the respondent that we have checked the redlining for CP1546 'Introducing DTC flows to transfer UMS Summary Inventories and Control files' and the Faster Switching Changes and they do not conflict with CP1552.

Two respondents commented that CP1552 will have a Medium impact on their organisation. Both respondents stated that CP1552 will have a positive impact on their organisation. One of the respondents highlighted that the Change should reduce the effort required when engaging with Suppliers.

Only one respondent gave a further comment on CP1552 and they stated that they believed the change will better facilitate party performance of the obligations within BSCP520.

Comments on the proposed redlining

The respondents had no comments about the redlined text.

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8. Recommendations

We invite the **SVG** to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1552 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP501 and BSCP520 for CP1552; and
- **APPROVE** CP1552 for implementation on 30 June 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**
BSC	Balancing and Settlement Code
CP	Change Proposal
CPC	Change Proposal Circular
MPAN	Meter Point Administration Number
PAB	Performance Assurance Board
SMRA	Supplier Meter Registration Agent
SMRS	Supplier Meter Registration Service
TAPAP	Technical Assurance of Performance Assurance Parties
UMS	Unmetered Supplies
UMSOs	Unmetered Supplies Operators
UMSUG	Unmetered Supplies User Group members

EMAR message flows and data items

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

EMAR Message Flows and Data Items		
DTC Code	**Market Message Identifier**	**Name**
D0205	MM00108	Update Registration Details
D0386	MM00378	Manage Metering Point Relationships

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**
3,7	BSCP520 ‘Unmetered Supplies Registered in SMRS’	https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/
3,7	BSCP501 ‘Supplier Meter Registration Service’	https://www.elexon.co.uk/csd/bscp501-supplier-meter-registration-service/
5	PAB247 Meeting	https://www.elexon.co.uk/meeting/pab247/
5	UMSUG133 Meeting	https://www.elexon.co.uk/meeting/umsug-133/
9	SVG249 Meeting	https://www.elexon.co.uk/meeting/svg249/
10	CP1546 ‘Introducing DTC flows to transfer UMS Summary Inventories and Control files’	https://www.elexon.co.uk/change-proposal/cp1546/

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