# ELEXON

# **CP Assessment Report**

# CP1558 'New Registration data items and processes to support the MHHS transition'

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#### Committee

Supplier Volume Allocation Group (SVG)

#### Recommendation

Approve

#### Implementation

29 June 2023

(June 2023 Release)



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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
- You can find the definitions of the terms and acronyms used in this document in the <u>BSC Glossary</u>



This document is the Change Proposal (CP) Assessment Report for CP1558 which Elexon will present to the SVG at its meeting on 5 July 2022. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1558.

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.
- Attachment A contains the CP proposal form.
- Attachment B-C contain(s) the proposed redlined changes to deliver the CP1558 solution.

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- Attachment D contains the full responses received to the second CP Consultation.
- Attachment E contains the full responses received to the first CP Consultation.

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#### Summary

#### Why change?

In its consultation on the Detailed MHHS Target Operating Model Design, Data Items and Processes in December 2020, the Code Change and Development Group (CCDG)2 set out the Registration Service data items needed for Market-wide Half-Hourly Settlement (MHHS) to form part of the Design Baseline to be published in April 2022. However, it was concerned that starting migration to MHHS in October 2024 with poor quality underlying data will lead to avoidable time and effort being spent trying to fix issues during the twelve month migration period, leading to delays.

#### **Market-wide Half Hourly** Settlement

Ofgem is introducing Half Hourly Settlement on a market-wide basis in orde to realise the full benefits of settlement reform. The successful introduction of MHHS is a key component of Ofgem's work to facilitate decarbonisation and smarter, more flexible energy sector.

#### Solution

In its MHHS transition consultation<sup>3</sup> published in July 2021, the CCDG recommended that a subset of the Registration Service data items required for MHHS are introduced in February 2023, about 18 months before migration is due to commence in October 2024. This is because the quality of these data items are critical to the migration to MHHS, so introducing them early allows time for cleansing.

This CP relates exclusively to data items provided and notified by a Licensed Distribution System to a Supplier Meter Registration Agent (SMRA) and will require the additional data items to be integrated into existing process steps in BSCP501 and BSCP515 as follows:

- 'New Connection for SVA Metering System' (BSCP501 section 3.6 and 3.10 and BSCP515 section 3.3) to allow the items to be set for new Supplier Volume Allocation (SVA) Metering Systems.
- 'Update of SMRS Database by Licensed Distribution System Operator' (BSCP501 Section 3.2) to allow the items to be amended by the Licensed Distribution System Operators (LDSO) where required.

This CP will not require population of these items for all existing SVA Metering Systems as part of implementation. That activity will be coordinated separately by the Market Wide Half Hourly Settlement Programme (MHHSP) once the new data items have been introduced.



#### **CCDG**

The CCDG is a working group that developed the detailed design areas of the Design Working Group's (DWG's) Target Operating Model (TOM), following the initial works done by the DWG. The group also further developed the transition approach, also accounting for runoff of the existing (Non Half Hourly) NHH arrangements. CCDG was initially responsible for the code changes (including subsidiary documents), however this is now the responsibility of the MHHS Programme's Cross Code Advisory Group.

#### Impacts and costs

This CP is expected to impact SMRAs and LDSOs.

This CP is a document only change and will impact BSCP501 'Supplier Meter Registration Service' and BSCP515 'Licensed Distribution', 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.

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<sup>&</sup>lt;sup>1</sup> https://www.elexon.co.uk/documents/industry-consultations/2020-industry-consultations/code-changedevelopment-group-on-mhhs-consultation-tom-17dec2020/

https://www.elexon.co.uk/group/code-change-and-development-group-ccdg/

<sup>&</sup>lt;sup>3</sup> https://www.elexon.co.uk/consultation/ccdg-consultation-on-transition-approach-for-mhhs/

# **Implementation**

This CP is recommended for implementation on **29 June 2023** as part of the standard June 2023 BSC Release. This is the date that was preferred by majority of the responses to the second CP consultation.

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# 2. Why Change?

#### What is the issue?

In December 2020 the CCDG set out the Registration Service data items needed for MHHS to form part of the Design Baseline to be published in **April 2022**. However, it was concerned that starting migration to MHHS in **October 2024** with poor quality underlying data would lead to avoidable time and effort being spent trying to fix issues during the twelve month migration period, leading to delays.

#### **Background**

In its MHHS transition consultation<sup>4</sup>, the CCDG recommended that a subset of Registration Service data items required for MHHS are introduced before migration commences in **October 2024**. This is because these items are so critical to the MHHS rules and processes that going live with poor quality data would lead to avoidable time and effort being spent fixing issues during the 12 month migration period, leading to delays.

The CCDG recommended that these critical data items and supporting BSC processes are introduced into existing Supplier Meter Registration Service (SMRS) systems before October 2024 to allow sufficient time for them to be back populated for all SVA Metering Systems.

The CCDG carried out additional pre-work to identify and define the impacts to interfaces and market messages, supported by SMRAs. That activity also involved defining changes to the D0312 'Notification of Meter Information to MPAS' data flow to allow additional items to be updated by SVA Meter Operator Agents and a requirement to display the new items in the Electricity Enquiry Service (EES, a.k.a. ECOES) These changes are being progressed under a separate Retail Energy Code (REC) change R0032 and are not part of this CP.

In addition to the new data items and processes introduced by this CP from, supporting activities will be needed to populate values for existing SVA Metering Systems, and a period of data cleanse in the lead up to the migration to MHHS. These activities are expected to commence in late 2022 and run through to mid-2024 and are not covered by this CP. They will be coordinated by the MHHS Programme.

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<sup>&</sup>lt;sup>4</sup> https://www.elexon.co.uk/consultation/ccdg-consultation-on-transition-approach-for-mhhs/

#### **Proposed solution**

The Retail Energy Code (REC) has raised the change R0032 'New Registration data items and processes to support the transition to MHHS'5. This BSC CP and R0032 will collectively deliver the CCDG's transition recommendation as follows:

#### This CP will:

- Create Connection Type, Connection Type Effective From Date (EFD), Connection
  Type Effective To Date (ETD) and Associated Import/Export Metering System Identifier
  (MSID) as new BSC owned data items in the EMDS.
- Recognise Energy Direction and Metered Indicator in BSCP501 and BSCP515.
- Modify existing processes in BSCP501 and BSCP515 to require that these data items
  are populated on connection of a new SVA Metering System and can be amended if the
  LDSO is made aware of a change or an incorrect value.

#### R0032 will:

- Implement changes to the D0312 dataflow.
- Create Electricity Smart Meter Equipment (ESME) Id and Number of Displayed Register
   Digits as new REC owned data items in the Data Specification
- Make changes to the Electricity Enquiry Service (EES, a.k.a. ECOES) to display all new data items (BSC and REC owned) introduced by both CPs
- Consider data access requirements for new items for EES Users (GUI and API), particularly the implications of ESME ID (Smart Meter security).

#### LDSO mastered data items and processes

The new data items introduced by this CP will be mastered by the LDSO and set at the point of connection of a new SVA Metering System. The LDSO may subsequently identify or be notified of incorrect values by other participants following routine site visit activity, which will require the new items to be updated using the existing BSC process.

#### Connection Type (Dlnew)

This data item will identify the physical connection as one of four valid types for metered supplies: Whole Current (W), Low Voltage (LV) Current Transformer (L), High Voltage (HV) Current Transformer (H) or Extra High Voltage (EHV) Current Transformer (E).

It may also include a value of 'U' for unmetered connections to avoid ambiguity, should NULL or W be considered not appropriate.

#### Connection Type Effective From Date (Dlnew)

This is the date and time from which the value for Connection Type became effective

#### Connection Type Effective To Date (Dlnew)

This is the date and time to which the value for Connection Type remains effective

# Associated Import/Export MSID (DInew)

This will create a relationship between the import MSID and export MSID at a particular site to identify where common processes are needed for both Metering Systems.

https://recportal.co.uk/group/guest/-/new-registration-data-items-and-processes-to-support-the-transition-to-market-wide-half-hourly-settlement-mhhs-

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#### **Energy Direction** a.k.a. meteringPointEnergyFlow (DI90033)

This is currently derived by the Electricity Online Enquiry Service (ECOES) based on the assigned Line Loss Factor Class (LLFC), but it should be set by the LDSO as an item in its own right. Energy direction is known at the point of connection, and it determines the relevant LLFC for Distribution Use of System (DUoS) charging, rather than the reverse.

The Central Switching Service (CSS), once live in mid-2022, will consume this item and so any impacts on that system must be considered.

#### **Metered Indicator** a.k.a. *meteringPointMeteredInd (DI90035)*

This data item already exists 'virtually' in SMRS and is sent to the Central Switching Service (CSS) to differentiate between metered and unmetered MSIDs, but it is not yet recognised in standard BSC processes, which still use Measurement Class (MC).

As all Unmetered Supplies (UMS) MSIDs will be settled HH under MHHS, there will no longer be a need to differentiate NHH UMS (MC B) from HH UMS (MC D). Once the MHHS transition is complete, MC will become redundant and can be discontinued.

The CCDG's understanding is that the new data items proposed by this CP are already being maintained by LDSOs for their own records under existing obligations but they are not notified to SMRS or the EES.

#### Proposals for data population and cleanse following implementation

Once the new data items have been implemented, a period of data cleanse will need to be carried out under the oversight of the MHHS Programme, some initial thinking has been set out below:

- The EES will need to be able to receive and display the new data items introduced by both this CP and R0032. This will be progressed and impact assessed as part of the related REC change.
- Monthly cleansing reports will need to be produced from the implementation of this CP and R0032 and initial population, through to the near completion of migration.
- These monitoring reports have not yet been defined, but will include the new data items and existing data items to enable recipients to validate and reconcile data to ensure the data is complete and accurate as far as is possible.
- Where items are currently being derived in the EES from other items (for example, Energy Direction is derived from LLFC Id), these should be fed directly from the new data items in SMRS or the Electricity Retail Data Service (ERDS) to ensure that we achieve the goal of a 'single view of the truth' from as early as possible.

Once these new registration data items, supporting interfaces and processes have been introduced, the CCDG recommended a period of centrally coordinated data cleanse activity running from February 2023 to October 2024. This will ensure that the data items introduced by this CP and R0032 that are critical to a successful migration and fundamental to MHHS will be as accurate as possible by **October 2024**.

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#### Suggested proposal for initial population and data cleanse

Elexon and the MHHS Programme have considered the responses to both the first and second consultations and will adopt the approach set out below:

#### **Energy Direction**

Initial population of Energy Direction will be using LLFC Type (J0775)

- LLFC Types A & B = Import
- LLFC Types C & D = Export

#### **Metered Indicator**

Metered Indicator does not require population as it has been implemented for Switching

#### **Connection Type**

Connection Type population is envisaged as a three stage process, starting with an SMRS derived value based on agreed pre-defined mappings. SMRS will then apply a 'confidence score' to indicate the accuracy of the Connection Type, i.e. the greater the number of values that don't conform to the rule, the lowers the confidence score.

The LDSO will then make manual updates to Connection Types with a MED or LOW score. Any correction from the LDSO will automatically update the score to HIGH. The remaining pool of MED and LOW will then be shared with Suppliers and MEMs for correction. LDSOs will update Connection Type based on Supplier and MEM findings.

Requirements to update the Connection Type

SMRAs will require an agreed mapping of Profile Class, Measurement Class, Meter Type and Metered Indicator to Connection Type and Confidence Score" so that this can be programmed into SMRS systems.

Reporting of Migration progress should be done centrally through EES (ECOES), subject to the R0032 implementation timings. Reports could be run from SMRS but these would need to be aggregated centrally and would need to be defined.

# Proposer's rationale

This CP will deliver Recommendation 1 by the CCDG, as set out in its Consultation on the Transition Approach for MHHS.

Given the importance of the MHHS Programme, the early introduction of these key registration items will allow a sufficiently long period of data cleanse, which in turn will significantly de-risk the migration activities due to commence in late 2024.

# **Proposed redlining**

The proposed redlining to BSCP501 and BSCP515 for this CP can be found in Attachments B-C of this paper.

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# 4. Impacts and Costs

#### **BSC Party & Party Agent impacts and costs**

#### Participant impacts and costs

CP1558 is expected to impact LDSOs and SMRAs. Despite Parties indicating costs and impacts being high in the Consultations. Elexon doesn't anticipate these high costs to be a direct result of CP1558, as this CP only adds extra data items for the LDSO to populate. The creation of these data items, and the data flows is due to the R0032 Change, which will be the main cause of the impacts and costs.

BSC Party & Party Agent Impacts		
BSC Party/Party Agent Impact		
LDSOs	May incur costs associated with updating internal records and procedures to capture/record the new data items and the ongoing maintenance of these data items.	
SMRAs	May incur costs associated with receiving and processing (including validating) the new data items.	

# **Central impacts and costs**

#### **Central impacts**

This CP will only impact BSC documentation. No BSC Central Systems will be impacted.

Central Impacts		
Document Impacts	System Impacts	
BSCP501 'Supplier Meter Registration Service'	None	
BSCP515 'Licensed Distribution'	None	

#### **Central costs**

The central implementation costs for CP1558 will be approximately £1000 to implement.

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# 5. Implementation Approach

#### **Recommended Implementation Date**

This change is recommended for implementation for 29 June 2023 as part of the standard June 2023 BSC Release.

#### **Implementation Date History**

Elexon's initial recommendation for the Implementation Date was 23 February 2023, which followed CCDG's recommendation. This was recommended so that there is more time available for the data cleansing activities that will follow. Furthermore the Modification P432 Half Hourly Settlement for CT Advanced Metering Systems 6 is also materially impacted by CP1558, as the Connection Type data item will be used for the compliance monitoring aspects of P432.

However, we have considered the responses to both consultations, and feedback from the REC's consultation on R0032 that a February 2023 implementation date is not achievable. We also note that there are other in flight REC changes that will impact SMRS/ERDS registration systems (R0040 'CSS Switch Synchronisation to ERDA at SecuredActive' and R0044 'MHHS Programme Changes required to Central Switching Service') that are targeting June 2023 for implementation.

Therefore we have concluded that, on balance, the most pragmatic approach is to align the implementation date of CP1558 with those other changes, to minimise cost and allow for a single consolidated 'release' of all the MHHS enabling changes to make testing more efficient. We have shared the industry responses with the MHHS Programme to consider the impact of a June 2023 implementation for CP1558 on the wider MHHS plan and on Modification P432.

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<sup>&</sup>lt;sup>6</sup> https://www.elexon.co.uk/mod-proposal/p432/

https://recportal.co.uk/group/guest/-/css-switch-synchronisation-to-erda-at-securedactive

<sup>8</sup> https://recportal.co.uk/group/guest/-/mhhs-programme-changes-required-to-central-switching-service

#### 6. Initial Committee Views

#### SVG's initial views

#### **Progression Paper**

Elexon presented the CP1558 Progression Paper to the SVG for information at its meeting on 7 July 2020 (SVG253/07)<sup>9</sup>.

The SVG noted that:

- CP1558 has been raised; and
- The proposed progression timetable for CP1558.

The SVG had no comments.

#### Consultation

Elexon presented the first CP1558 Consultation responses to the SVG for information at its meeting on 1 March 2022 (SVG255/07)<sup>10</sup>.

An SVG Member commented that they felt the whole point of implementing CP1558 was to create a reliable data set, if the CP is changed to say that SMRS is populated from existing data, it will not help with the monitoring aspect of P432. Elexon responded that from the point of implementation the enduring processes will set those items independently, it is a mix of where there is existing data to use that existing data to do an initial population to then allow them to be cleansed. There are some opportunities to speed up that process e.g. if there's a Measurement Class rule that clearly identifies CT Meters, then that is a good starting point to at least presume that those will be CTs, but there will still have to be a process of having to go through all 30 million Metering Systems, CP1558 allows those items to be changed as information becomes available.

An SVG Member commented that they were unclear about the processes for CP1558, automatically allocating Connection Types weren't part of the CP initially. Elexon clarified that CP1558 will only put in mechanisms by which you can set new connections using the new data items. There is a subsequent exercise which this CP does not cover, there is a set of data cleanse activities that will be directed by the MHHS Programme.

An SVG Member commented that a common theme in the responses were that Parties were not supportive of the Implementation Date, the Member was concerned that this might result in continual minor slippage of the requirements. It was stated that if Changes related to the MHHS Programme are going to be raised then it needs to be very clear to industry that these Changes are aligned with the MHHS Programme as we do not want to add extra burden to industry.

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<sup>9</sup> https://www.elexon.co.uk/meeting/svg253/

<sup>10</sup> https://www.elexon.co.uk/meeting/svg255/

### 7. Industry Views - First consultation

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

We received 8 responses to the first CP1558 consultation, four were Distributors, two were Service Providers to Industry Participants, one was a Supplier Agent and the other was a Supplier.

Summary of First CP1558 CP Consultation Responses				
Question	Yes	No	Neutral /No Comm ent	Other
Do you agree with the CP1558 proposed solution?	7	1	0	0
Do you agree that the draft redlining delivers the intent of CP1558?	6	0	2	0
Will CP1558 impact your organisation?	7	1	0	0
Will your organisation incur any costs in implementing CP1558?	7	1	0	0
Do you agree with the proposed implementation approach for CP1558?	1	6	0	1
Do you have any further comments on CP1558?	3	5	0	0

Majority of the respondents agreed with the CP1558 proposed solution, however they had identified a few areas which the CP had not addressed in regards to the initial population and data cleansing, therefore in the second Consultation paper these concerns were addressed. One respondent disagreed with the solution because they had concerns regarding any proposals being raised outside of the MHHS Programme's governance.

#### **Redlining to deliver CP1558 solution**

Majority of the respondents agreed the draft redlining delivers the CP1558 Proposed solution, one respondent did have a minor comment regarding BSCP501 which is highlighted in the proposed redlining section below.

#### **Impacts and Costs**

Seven respondents stated CP1558 will impact their organisation, with six indicating that it will have a high impact on their organisation as a number of changes will need to be made to the MPRS system to incorporate the new data items.

Seven respondents stated their organisation will incur costs in implementing CP1558, six stating costs will be high to deliver the MPRS system.

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#### **Implementation Date**

Majority disagreed with the proposed Implementation Date for this CP and suggested delaying the Implementation to June 2023 for the following reasons:

- By utilising a delay it reduces overlap with the early life support of the Faster Switching Programme;
- It will be a more efficient use of resources if CP1558 is considered alongside other industry changes in the pipeline (R0032 and R0010); and
- CP1558 should be delayed to coincide with the delivery of the MHHS physical baseline to reduce the risk of further changes to CP1558.

# Comments on the proposed redlining

Comments on the CP1558 Proposed Redlining			
Document & Location	Comment	Elexon's Response	
BSCP501 – 3.2.1	Are these data items comprehensive? If so, replace "e.g." either with "i.e." or remove the qualifier completely to be consistent with 3.6.1,3 .10.1 and BSCP515.	"e.g." has been removed so that section 3.2.1 is consistent with 3.6.1, 3.10.1 and BSCP515	

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#### 8. Industry Views - Second consultation

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

We received a total of eleven responses to the second CP Consultation. The respondents consisted of five Distributors, two Service Providers, two Suppliers, one Supplier Agent and one Trade Body.

Summary of Second CP1558 CP Consultation Responses				
Question	Yes	No	Neutral /No Comm ent	Other
Do you have any comments or suggestions for the initial population and data cleanse that you think the MHHS Programme should consider?	9	2	0	0
Do you agree with the CP1558 proposed solution?	7	2	2	0
Do you agree that the draft redlining delivers the intent of CP1558?	4	4	3	0
Will CP1558 impact your organisation?	8	1	2	0
Will your organisation incur any costs in implementing CP1558?	8	1	1	0
Do you prefer February 2023 or June 2023 for the implementation approach for CP1558?	2	7	2	0
Can you deliver CP1558 in February 2023?	8	1	2	0
Do you have any further comments on CP1558?	6	5	0	0

Majority of the respondents agreed with the CP1558 proposed solution and noted that their concerns and queries from the previous consultation has been addressed. One respondent didn't agree and stated that this Change should not be raised outside of the MHHS Programme and they did not see the benefit of carrying out these activities early.

#### **Redlining to deliver CP1558 solution**

Four respondents agreed with the draft redlining and four disagreed, the remaining three did not comment. The respondents didn't comment on the draft redlining in BSCP501 and BSCP515 as many had already agreed to these changes during the first Consultation. However, those that disagreed stated that BSCP604 (REC 3.0 version) will need to be updated to include the new data items to allow for Manual Correction during the Migration/Population period.

Elexon notes that BSCP604 will require an amendment and will raise a CP to make these changes once the REC 3.0 version of BSCP604 is implemented under P436 'Consequential BSC changes for Switching SCR (REC 3.0)'11 (expected to be on 18 July 2022).

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<sup>11</sup> https://www.elexon.co.uk/mod-proposal/p436/

#### **Impacts and Costs**

The responses for the impacts and costs in the second consultation were largely similar to those form the first consultation. Nine respondents stated that they will be impacted by CP1558 and six of those stated they anticipated impacts to be high, it was highlighted that there will be considerable system changes and testing required to support CP1558.

Nine respondents stated that their organisation will incur costs in implementing CP1558 and six of these respondents indicated that costs are expected to be high. It was highlighted that the costs will be largely dependent on Participant's Service Provider to deliver the MPRS software.

#### **Implementation Date**

Majority of the respondents were in support of the June 2023 Implementation Date and stated that they cannot deliver CP1558 in February 2023. Respondents stated that implementing in June will give them the opportunity to focus on Faster Switching go-live and it will also allow for the enduring MHHS physical design to be baselined, reducing the risk of change to the stage 0 requirements. It was noted that if it was approved for February 2023, this isn't a sufficient amount of time to make the changes to MPRS and for Distribution Network Operators (DNOs)/ Independent Distribution Network Operator (IDNOs) to implement the code within their production environments

Two of the respondents preferred the February 2023 Implementation Date and stated that the CCDG had initially recommended this Change to be implemented in November 2022 therefore this date should not slip again. It was highlighted that the use of this data is key to the effective implementation of P432 to identify all CT Metered sites. It will also have a minor role in P434 'Half Hourly Settlement for UMS Metering Systems' where the Meter Indicator may be incorrectly set.

Elexon has noted the concerns from the respondents and now recommends the implementation of CP1558 is delayed to June 2023 to allow participants more time to prepare for the implementation of this Change.

#### Comments on the proposed redlining

Comments on the CP1558 Proposed Redlining		
Document & Location	Comment	Elexon's Response
BSCP501 – 3.2.1	Inclusion of the Connection Type EFD and Connection Type ETD	BSCP501 has been updated to reflect this.
BSCP515 – 3.3.1	Inclusion of the Connection Type EFD and Connection Type ETD	BSCP515 has been updated to reflect this.
BSCP501 – 3.6.1	Inclusion of the Connection Type EFD and Connection Type ETD	BSCP515 has been updated to reflect this.

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ago to or to

<sup>12</sup> https://www.elexon.co.uk/mod-proposal/p434/

# 9. Recommendations

We invite the **SVG** to:

- AGREE the amendments to the proposed redlining for CP1558 made following the CP Consultation;
- APPROVE CP1558 for implementation on 23 June 2023 as part of the standard June 2023 Release.

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