

CP Assessment Report

CP1565 'Updating BSCP520 to address operational issues in the Central Management System'

Contents

1. Summary	2
2. Why Change?	3
3. Solution	4
4. Impacts and Costs	5
5. Implementation Approach	6
6. Initial Committee Views	7
7. Industry Views	8
8. Recommendations	10

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 [BSC Glossary](https://www.elexon.co.uk/glossary/?show=all)¹*

This document is the Change Proposal (CP) Assessment Report for CP1565 which Elexon will present to the Supplier Volume Allocation Group (SVG) at its meeting on 6 September 2022. The Committee will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1565.

There are four 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 contains the proposed redlined changes to deliver the CP1565 solution.
- Attachment C contains the full responses received to the CP Consultation.



Committee

Supplier Volume
Allocation Group (SVG)

Recommendation

Approve

Implementation Date

3 November 2022
(November 2022
Release)



Contact

Jenny Sarsfield
020 7380 4352

BSC.change@elexon.co.uk

Jenny.sarsfield@elexon.co.uk



SVG259/08

CP1565

CP Assessment Report

30 August 2022

Version 1.0

Page 1 of 10

© Elexon 2022

¹ <https://www.elexon.co.uk/glossary/?show=all>

1. Summary

Why change?

Central Management Systems (CMS), used in dynamic street lighting control, do not currently have a clear approval process within the BSC. As a result of this process not being clearly defined and documented, there is a risk that CMS will be non-compliant. Additionally, there is no clearly defined fault reporting process, which increases the likelihood that the CMS will contain incorrect data as a result of a fault.

Solution

This CP seeks to update BSCP520 to contain a clearly outlined CMS approval and fault reporting process. This would involve updating the test specification document to set out the tests to be completed, and detailing the timescales expected for fault reporting.

The redlining to support this change can be found in Attachment B.

Impacts and costs

The proposed changes would positively impact those involved in CMS approval and operation, due to increased clarity regarding the CMS approval and fault reporting processes.

This CP will require changes to one Code Subsidiary Document (CSD), BSCP520. No central system changes or impacts to BSC Agents are anticipated. The central implementation costs for this CP will be less than £1,000 to update the relevant impacted documents.

Implementation

The CP is proposed for implementation on 3 November 2022 as part of the standard November 2022 BSC Release. This is the first available release and will ensure that the expected benefits are achieved as soon as practicable.

Recommendation

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1565 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP520; and
- **APPROVE** CP1565 for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.

2. Why Change?

What is the issue?

The BSC does not currently contain clear guidance on how Central Management System (CMS) and Measurement Central Management System (mCMS) applications are approved. Additionally, when faults are detected, the BSC does not provide guidance on how they are reported. As a result, common operational issues have been identified with CMS that pose a risk to Settlement in terms of Half Hourly (HH) energy calculation accuracy.

Background

[BSCP520 'Unmetered Supplies Registered in SMRS'](#)² details the requirements for Unmetered Supplies (UMS) in the Supplier Meter Registration Service (SMRS). It explains that Metering data for Settlement purposes shall be derived utilising either an Equivalent Meter (EM) providing HH data or an Estimated Annual Consumption (EAC) per Metering System Identifier (MSID). The Metering data is recorded and dynamically controlled in the CMS.

Central Management Systems

Central Management Systems (CMS) are used in dynamic street lighting control to manage the electrical load of UMS equipment that can operate at multiple on/off time and/or dimming levels. The electrical loads are recorded as events, which are used by a Meter Administrator (MA) to calculate consumption data for Settlement. This form of Settlement is known as dynamic HH Settlement. Further, the CMS has a subset system called the Measurement Central Management Systems (mCMS), which uses feedback from an active measuring device to dynamically control and manage the electrical load used by UMS Apparatus.

The HH electricity consumption values associated with Unmetered Apparatus is calculated using hardware and software known as an Equivalent Meter. There are of two types of Equivalent Meter: Passive Meters and Dynamic Meters. Passive Meters allocate the Unmetered consumption using a mathematical relationship, while Dynamic Meters use operational or switching data.

Approval Process

Both the CMS and mCMS have their respective testing and approval process, which is one of the requirements any interested party must satisfy before they are granted the approval to use the CMS.

Several issues with the current approval process have been identified, particularly around the testing of the systems. For example, some new CMS Providers are using an 'existing approved system' which has not been subject to testing under their control, and then appear to not fully understand the operational requirements or have the system configured incorrectly. There are also concerns that evidence presented by CMS Providers may be unclear or doctored.

Having a clear and documented process within BSCP520 would promote consistency in the approval process and the evidence provided, reducing issues going forwards.

SVG259/08

CP1565

CP Assessment Report

30 August 2022

Version 1.0

Page 3 of 10

© Elexon 2022

² <https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/>

3. Solution

Proposed solution

The Proposer seeks to update BSCP520 to contain a clearly outlined CMS approval and fault reporting process. This change seeks to include the following areas in BSCP520:

- The test specification document will set out the tests to be completed and the approval process for a CMS and mCMS; and
- The fault reporting and resolution process will be clearly outlined, guiding the relevant Parties on who should report faults and when these faults should be reported.

This CP would also introduce the term “CMS Test Agent” to the BSCP, to mean an MA appointed to carry out testing of a CMS in accordance with the relevant test specifications. This would ensure that testing is carried out by a Qualified MA rather than Elexon.

Proposer’s rationale

If this change is not progressed, there is a risk that the CMS will contain incorrect data as a result of a fault. Further, the likelihood of CMS/mCMS not undergoing the required testing process will be high, thus introducing a risk of a non-compliant CMS/mCMS being used to record Metering data.

The inclusion of a clearly detailed test approval and fault reporting process will ensure that the current perceived risks to Settlement in relation to how HH energy is calculated and represented, is reduced.

Proposed redlining

The CP proposes to update BSCP520. The redlining to support this change can be found in Attachment B.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

Participant impacts

The proposed changes would outline a CMS approval and fault reporting process, and the increased clarity will have a positive impact to the BSC Parties and Party Agents involved in these processes.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Supplier	Increased clarity regarding the CMS approval and fault reporting processes.
Meter Administrator	
Unmetered Supplies Operator (UMSO)	
Half Hourly Data Collectors	

Participant costs

This CP intends to document the process that already occurs, so no additional resource requirements or costs are expected.

Central impacts and costs

Central impacts

This CP will require changes to one CSD, as listed below. No central system changes or impacts to BSC Agents are anticipated.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP520 'Unmetered Supplies Registered in SMRS'	<ul style="list-style-type: none">None

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
Elxon anticipate no significant impact on Settlement Risks associated with this change, but it could have a positive impact on SVA Risk 11 'Unmetered Supplies volumes calculated incorrectly'.

Central costs

The central implementation costs for this CP will be less than £1,000 to update the relevant impacted documents.

5. Implementation Approach

Recommended Implementation Date

The CP is proposed for implementation on 3 November 2022 as part of the standard November 2022 BSC Release. This is the first available release and will ensure that the expected benefits are achieved as soon as practicable.

6. Initial Committee Views

SVG's initial views

The CP1565 Progression Paper ([SVG257/03](#)³) was presented to the SVG committee at its meeting on 5 July 2022.

An SVG member questioned whether Half Hourly Data Collectors (HHDCs) would also be impacted due to their involvement in the fault reporting process. They further commented that it would be important to capture this impact prior to the consultation, so that HHDC views could be sought. Elexon agreed that HHDCs should be included as an impacted Party Agent, and the consultation document and webpage now reflect this.

SVG259/08

CP1565

CP Assessment Report

30 August 2022

Version 1.0

Page 7 of 10

© Elexon 2022

³ <https://www.elexon.co.uk/meeting/svg257/>

7. Industry Views

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

Two responses were received to the consultation, one from a Distributor and one from a Meter Administrator. Both responses were in support of CP1565, agreeing with the proposed drafting and implementation approach.

The two respondents both stated that their organisations would be impacted by the CP, and would incur costs. The Meter Administrator recognised that CP1565 would generate some further activity that they would need to undertake, but that ensuring more accuracy would be a positive impact for the industry. The Distributor noted that CP1565 would require process and document updates for their UMSO role, but that the costs would be low.

Summary of CP1565 CP Consultation Responses

Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1565 proposed solution?	2	0	0	0
Do you agree that the draft redlining delivers the intent of CP1565?	2	0	0	0
Will CP1565 impact your organisation?	2	0	0	0
Will your organisation incur any costs in implementing CP1565?	2	0	0	0
Do you agree with the proposed implementation approach for CP1565?	2	0	0	0
Do you have any further comments on CP1565?	0	2	0	0

Comments on the proposed redlining

There were several comments regarding the proposed redlining received as part of the consultation. A number of housekeeping errors were corrected, as detailed below, but no significant updates to the redlining were made. The redlining has also been re-baselined on the most recent version of the BSCP due to further releases. The following table details the comments made about the redlining, and Elexon's reasoning behind not amending it.

Housekeeping amendments to the CP1565 Proposed Redlining

Document & Location	Comment
BSCP520 1.7.2	The definition of the "CMS Test Agent", and "Charge Code" have been separated into separate paragraphs.
BSCP520 3.17.14	The reference to 3.17.12 has been corrected to 3.17.15.
BSCP520 3.17.16	The reference to 3.17.14 has been corrected to 3.17.17.
BSCP520 4.6.3.2	In the opening paragraph, "a meter" has been corrected to "an Equivalent Meter"
BSCP520 4.6.3.3f	Repetition of "affected" has been removed.

SVG259/08

CP1565

CP Assessment Report

30 August 2022

Version 1.0

Page 8 of 10

© Elexon 2022

Comments on the CP1565 Proposed Redlining

Document & Location	Comment	Elaxon's Response
BSCP520 3.17	The CMS fault reporting process does not stipulate what will happen if CMS approval is removed for a specific manufacturer, or how are those affected customers to be treated if their CMS is no longer approved.	Where CMS approval has been removed, it is then down to the UMSO at 3.17.18 to take whatever action is deemed appropriate under the National Terms of Connection to agree with the customer an inventory that is reasonably representative of the unmetered supplies being taken from the UMSO's network. This drafting is intended to allow for the variety of difference scenarios that may occur depending on the nature of the fault.
BSCP520 3.17	The CMS fault reporting process does not stipulate what checks will be made on the existing approved systems – will additional testing be required to ensure those systems meet the new updated testing and fault reporting process?	The UMSUG view was that testing all existing approved systems should not be required on a routine basis. If any system is found to be “faulty”, as per 4.6.3.3 e, then the system will enter the fault process, which could lead to retest and rectification.

8. Recommendations

We invite the SVG to:

- **AGREE** the amendments to the proposed redlining for BSCP520 for CP1565 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP520 for CP1565; and
- **APPROVE** CP1565 for implementation on 3 November 2022 as part of the standard November 2022 BSC Release.