

CP Assessment Report

CP1590 'Enabling use of DTN agent appointments process for P434'

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Committee

Supplier Volume
Allocation Group (SVG)



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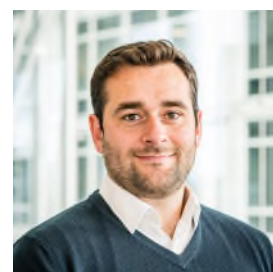
About This Document

You can find the definitions of the terms and acronyms used in this document in the [BSC Glossary¹](#).

This document is the Change Proposal (CP) Assessment Report for CP1590 which Elexon will present to the SVG at its meeting on 9 January 2024. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1590. There are four parts to this document:

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 along with industry views from the CP Consultation.
- Attachment A contains the CP proposal form.
- Attachment B contains the proposed redlined changes to deliver the CP1590 solution
- Attachment C contains the full responses received to the CP Consultation.



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



We suggest reading the following sections:

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

Why change?

BSC Modification [P434 'Half Hourly Settlement for UMS Metering Systems'](#)² will require the retention of Non-Half Hourly Unmetered Supply (NHH-UMS) MSID in order to carry out the Change of Measurement Class (CoMC) of NHH-HH UMS MSIDs 12 months prior to the UMS Mandate Go Live Date. Under the current timetable, this date is April 2024.

[BSCP520 'Unmetered Supplies Registered in SMRS'](#)³ sections 3.1, 3.4 & 3.5 set out that if HH, the Supplier must send appointment details to each Supplier Agent by issuing a D0155 Notification of new Meter Operator or Data Collector Appointment and Terms, and a D0148 Notification of Change to Other Parties. However, it does not stipulate the requirement for a D0011 'Agreement of Contractual terms' to be returned by response by each Supplier Agent.

Solution

To update BSCP520 Section 3.1 to reflect the Agent appointment Dataflows that should be used for Data Transfer Network (DTN) derived agent appointments, along with sections 3.4 and 3.5 for the same reasons.

Note: CP1590 does not mandate the use of DTN dataflow exchanges but only acts to enable choice for Parties and Party Agents alike. This is to ensure Parties who do not wish to use DTN derived agent appointment processes "Electronic or other agreed method" remains possible. Thereby allowing Suppliers or Party Agents, who choose to communicate appointments outside of the DTN, to do so.

Impacts and costs

The estimated cost for CP1590 is <£2k for BSCCo. Elexon anticipates a low impact to the majority of Suppliers. Impacts and costs from respondents to the CP Consultation are summarised in Section 7.

Implementation

An implementation date of 29 February 2024 as part of February 2024 release is recommended.

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² <https://www.elexon.co.uk/mod-proposal/p434/>

³ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp520-unmetered-supplies-registered-in-smrs>

2. Why Change?

What is the issue?

BSC Modification [P434 'Half Hourly Settlement for UMS Metering Systems'](#) will require the retention of NHH UMS MSID in order to carry out the Change of Measurement Class (CoMC) of NHH-HH UMS MSIDs 12 months prior to the UMS Mandate Go Live Date. Under the current timetable, this date is April 2024.

[BSCP520 'Unmetered Supplies Registered in SMRS'](#) sections 3.1, 3.4 & 3.5 set out that if the data is HH, the Supplier must send appointment details to each Supplier Agent by issuing a D0155 Notification of new Meter Operator or Data Collector Appointment and Terms, and a D0148 Notification of Change to Other Parties. However, it does not stipulate the requirement for a D0011 'Agreement of Contractual terms' to be returned by response by each Supplier Agent.

Furthermore, the Data Transfer Catalogue (DTC) does not reflect that these dataflows can be transmitted between the Supplier (role code "X") & the Meter Administrator (role code "4") despite that in reality the DTN already facilitates the sending and receiving of these Market Messages. Consequently, this may be causing a constraint with Suppliers' Market Message Interactions system service providers who are likely to configure inbound & outbound DTN connection on the basis of the DTC, preventing Suppliers from taking up the option of using the DTN.

In addition, there is no requirement set out in BSCP520 for the Supplier to issue a D0289 'Notification of MC/EAC/PC' to its appointed HHDC, despite Elexon's published guidance that [BSCP502 'Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'](#)⁴ makes no distinction between Metered & Unmetered, so Suppliers should have bi-lateral conversations about the D0289 content. For clarity, BSCP502 does make a distinction as it outlines in Section 1.1 that "(BSCP502) in respect of Unmetered Supplies, covers the validation rules and data estimation for half hourly data, all other requirements, including data collection, are covered in BSCP520".

In practical terms, the reason why a D0289 is required is to enable data estimation if no calculated HH data is provided by the Meter Administrator for any reason upon the NHH UMS MSID becoming HH, as it is used to form the basis of Data Estimation method 'G' (as described under section 4.2.1 of BSCP502). Suppliers may be able to utilise information from its NHH trading arrangements to populate an accurate Profile Class (PC) & Estimated Annual Consumption (EAC) value, along with the HH UMS Measurement Class to achieve this. In the absence of a D0289, the HHDC will be required to use Default Period PCs Coefficient (DPCC) for PC 06 in line with Data Estimation method 'H'. Therefore, the D0289 provides a better HH estimate if it is required for any reason upon moving to HH settlement arrangements.

Background

The appropriateness of using the DTN for the CoMC for P434 was posed as part of the P434 consultation process. The majority of respondents stated that using the DTN would be the most appropriate method for bulk appointments, as it will reduce manual work and, although it would create additional costs, it would likely be a worthwhile investment. CP1590 aims to deliver the option, but not the mandate to use the DTN for the agent appointments process - in line with consultation feedback.

CP1590 will enable Suppliers who may be considering the use of DTN derived Dataflows to meet the requirements to migrate their UMS portfolios over the 12 months up to the UMS

⁴ <https://bscdocs.elexon.co.uk/bsc-procedures/bscp502-half-hourly-data-collection-for-sva-metering-systems-registered-in-smrs>

mandate go live date, e.g. Suppliers with large portfolios of NHH UMS MSIDs who are seeking to automate the CoMC of the relevant NHH UMS MSID to HH settlement.

In the absence of an industry defined procedure for the appointment of HH UMS Supplier Agents, it may prove very challenging for Suppliers with thousands of MSIDs to utilise the existing manually derived processes to exchange information in their systems. In turn, this may increase the risk of Suppliers failing to achieve the completion of NHH UMS NHH-HH CoMC activity by the UMS Mandate Go Live Date which is currently set for April 2025 - due to the sheer volume of MSIDs they are to complete without system automation driving the process.

3. Solution

Proposed solution

To update BSCP520 Sections 3.1 to reflect the Agent appointment Dataflows that should be used for DTN derived agent appointments, along with sections 3.4 & 3.5 for the same reasons.

Proposer's rationale

CP1590 does not mandate the use of DTN dataflow exchanges but only acts to enable choice for Parties and Party Agents alike. This is to ensure that Parties who do not wish to use DTN derived agent appointment processes "Electronic or other agreed method" are not obliged to. Suppliers or Party Agents who choose to communicate appointments outside of the DTN can continue to do so.

Proposed redlining

The proposed redlined changes to BSCP520 can be found in Attachment B.

4. Impacts and Costs

BSC Party & Party Agent impacts and costs

As it is optional to use the proposed DTN data flow exchanges, low impacts are anticipated to the majority of Suppliers. Impacts and costs from respondents to the CP Consultation are summarised in Section 7.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers – Low impact	Suppliers wishing to utilise a DTN solution would need to ensure that their systems and processes support the receipt/generation of the flows referenced in the redlining, e.g., D0155, D0148 and D0011.

Central impacts and costs

Central impacts

Regarding BSCCo impacts, the initial view was that CP1590 is limited to BSCP520. However, it was noted during the CP Consultation that changes to the ‘SVA Data Catalogue Volume 1 Appendix A’ would also be required.

Ellexon does not anticipate any internal System Impacts.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP520SVA Data Catalogue Volume 1 Appendix A	<ul style="list-style-type: none">N/A

Impact on BSC Settlement Risks

Impact on BSC Settlement Risks
No direct impact on BSC Settlement.

Impact on Market-wide Half Hourly Settlement (MHHS)

Impact on MHHS
There are no anticipated impacts on MHHS.

Central costs

The central implementation costs for CP1590 will be <£2k for BSCCo.

5. Implementation Approach

Recommended Implementation Date

CP1590 is required to support processes that are required but not procedurally defined under the P434 decision for the start of moving UMS MSIDs into HH settlement in April 2024(12 months prior to the UMS Mandate GoLive Date).

As this is a document only change to BSCP520, it is therefore recommended for an implementation date of 29 February 2024, as part of February 2024 standard release.

6. SVG's initial views

At its meeting on 7 November 2023 ([273/04⁵](#)) the SVG was invited to note the progression of the CP and provide any comments or additional questions for inclusion in the CP Consultation. It was also noted by the Lead Analyst that the dataflow D0261 'Rejection of Contractual terms' is included as part of the redlining for these instances.

The SVG made no further comments nor suggested any additional consultation questions.

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⁵ <https://www.elexon.co.uk/meeting/svg273/>

7. Industry Views

This section summarises the responses received to the CP Consultation. The full responses are included in Attachment C.

Summary of CP1590 Consultation Responses				
Question	Yes	No	Neutral/No Comment	Other
Do you agree with the CP1590 proposed solution?	5	1	0	0
Do you agree that the draft redlining delivers the intent of CP1590?	5	1	0	0
Will CP1590 impact your organisation?	5	1	0	0
Will your organisation incur any costs in implementing CP1590?	5	1	0	0
Do you agree with the proposed implementation approach for CP1590?	4	2	0	0
Do you have any further comments on CP1590?	2	4	0	0

Additional redlining to CP1590

During the November CPC it was noted that there would need to be changes to additional documents to facilitate CP1590. These were:

- [SVA Data Catalogue Volume 1 Appendix A⁶](#)
- The Retail Energy Code's (REC) Energy Market Data Specification (EMDS), which forms part of the Energy Market Architecture Repository (EMAR)

These were added to the consultation on 28 November 2023 and are included in Attachment B. Elexon notified respondents of these additional redlined documents to the original proposal and requested feedback as part of CP1590.

Proposed solution and implementation approach

Five out of the six respondents agreed with the CP1590 proposed solution and agreed the redlining.

One respondent disagreed with CP1590, however, stated while there is not an issue with documenting the steps outlined in the solution, in reality it does not change the current ability to use these messages. They also provided suggested amendments to the redlining which are addressed in the redlining section of this document. In response to this, Elexon clarified that the purpose of CP1590 is to ensure that these steps are documented in

⁶ <https://www.elexon.co.uk/documents/bsc-codes/business-definition-documents/sva-data-catalogue-volume-1-2/>

relevant BSC documents to clarify that there is this option for Suppliers to utilise the DTN Dataflows.

Four respondents agreed with the implementation approach, with one recognising that CP1590 needs to be implemented ahead of April 2024.

Two did not agree with the implementation approach, with one stating that it is a short period to carry out the implementation steps of Impact Assessment, development and testing. To clarify, CP1590 will not remove any Dataflows, it is providing an option for this route, therefore is not mandatory.

Another stated that the changes from CP1590 should be effective from 1 April 2024 along with the process for NHH inventories removed as this would prevent the need for further changes to BSCP520 after 1 April 2024. Elexon recognises the merits of this feedback, however a wider review is required across the BSC to address redundant processes post MHHS implementation. Additionally, due to the timings of CP releases, February 2024 is the latest that this can be implemented as part of standard releases. Elexon also does not think it is suitable or proportionate for CP1590 to be issued as a standalone Special Release.

Impacts and costs

Impacts			
High	Medium	Low	None
2	2	1	1

Two respondents noted a High impact, with one stating that the impact would have been High, regardless of CP1590 as they would need to agree with each Supplier the mechanism of managing appointments.

Another stated that as they hold the largest market share of NHH UMS of any Supplier by MPAN count they have a dependency on being able to automate the CoMC process for the migration outlined in P434. Therefore, they state that formalising the ability for DTN derived Dataflows to be exchanged is critical to their ability to conduct and complete the requirements set out under P434.

Two respondents noted a Medium impact, with one noting that they would need to update their systems to reflect issuing D0011/D0261 along with receipt and utilising of D0289 in all estimating processes. The other respondent stated that the removal of existing processes and implementation of new processes will require system changes and testing. To clarify, CP1590 does not aim to remove any processes, however, aims to formalise in BSCP520 a process that is optional.

One respondent noted a Low impact only if they were to utilise the DTN D0155 and to automate the sending of the D0268. One respondent noted No impacts due to CP1590, however, noted P434 would impact their organisation.

Costs			
High	Medium	Low	None
1	2	2	1

One respondent noted High costs. They stated that they have developed an automated CoMC solution – this is where most of their costs fall under. They recognise the main aim of CP1590 is formalising the DTN dataflow exchanged as possibility and in turn enabling

transparency for industry and service providers alike to have an awareness that the use of DTN is an option. Therefore, CP1590 should provide a clear DTN gateway that can be configured to allow the exchange of the required CoMC dataflows over the DTN.

Two respondents noted Medium costs from CP1590, one stated that managing more than one method of receiving appointment details means requiring more processes, including costs to develop loading the MPAN appointments. They state these would also be nugatory one-off costs for them as MHHS will change the appointment process.

Another stated that Medium costs would be incurred due to the software changes to remove old steps and implement new steps, testing and deployment, along with process changes to update, cascade and train. To clarify, CP1590 will not remove processes but will add an optional method for DTN Dataflows.

One stated Low costs, while another reaffirmed that there would be no costs to implementing CP1590.

Additional comments

Additional comment	Elaxon response
In Summary – amending the BSCP520 to recognise that the D0011 or D0261 could if required be sent is an understandable change to document just for greater clarity. But they can already be sent today and use of them, and the D0155 and D0148 as recognised will continue to be agreed bi-laterally between each Supplier and their respective agents.	Elaxon recognises that this process can already be used. However, it is important for clarity for BSC Parties/Agents, to include the process in BSC documentation, in this case BSCP520, such that they are aware of this route.
Can you please confirm whether the new dataflow variants will be included in the EMAR.	Elaxon can confirm that CP1590 also proposed the changes to the EMAR as per the changes proposed to the EMDS document.

Comments on the proposed redlining

Comments on the CP1590 Proposed Redlining		
Document & Location	Comment	Elaxon's Response
BSCP520 3.1.12	D0148s not required at this stage as they are sent in 3.1.15	Elaxon agrees to this change and it is reflected in the updated redlining.
BSCP520 3.3.1	Processes detailed in 3.1.13, 3.1.14 and 3.1.15 should be mirrored in this process	Elaxon agrees to this change and it is reflected in the updated redlining.

Comments on the CP1590 Proposed Redlining		
BSCP520 3.4.1	D0148 not required here as it is sent in 3.4.4	Elexon agrees to this change and it is reflected in the updated redlining.
BSCP520 3.6.2	CoMC Process details the disconnection process twice but does not cover appointment of HH agents. Processes detailed in 3.1.13, 3.1.14 and 3.1.15 should be mirrored in this process.	The MA will not use the details within the D0302. However, a footnote has been added to BSCP520 where this is referenced to clarify that it should be sent to the HHDC only.
SVA Data Catalogue Volume 1 Appendix A and EMDS document Dataflow: D0151	Missing from both the SVA Data Catalogue and the EMDS changes. There needs to be a variant from Supplier to Meter Administrator included in both.	Elexon agrees to this change and it is reflected in the updated redlining.
SVA Data Catalogue Volume 1 Appendix A and EMDS document Dataflow: D0155	This is missing from both the SVA Data Catalogue and the EMDS changes. There needs to be a variant from Supplier to Meter Administrator included in both.	Elexon agrees to this change and it is reflected in the updated redlining.
SVA Data Catalogue Volume 1 Appendix A Dataflow: D0261	Incorrectly shown as going from Supplier to Meter Administrator.	Elexon agrees to this change and it is reflected in the updated redlining.
SVA Data Catalogue Volume 1 Appendix A Dataflow: D0302	Incorrectly shown as going from Meter Administrator to Supplier.	The MA will not use the details within the D0302. However, a footnote has been added to BSCP520 where this is referenced to clarify that it should be sent to the HHDC only.

Summary and Recommendations

In summary, most respondents agree with the CP1590 proposal, with the one respondent that disagreed understanding that the DTN Dataflows are to be included for the benefit of clarity that these are viable methods.

All recommended changes to the redlining were considered, with the majority of changes inputted and forming the updated redlining presented for approval. Most respondents also agreed with the implementation approach.

We therefore recommend to the SVG that CP1590 is approved along with the updated redlining.

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8. Recommendations

We invite the **SVG** to:

- **APPROVE** the proposed changes to BSCP520 and SVA Data Catalogue Volume 1 Appendix A for CP1590; and
- **APPROVE** CP1590 for implementation on 29 February 2024 as part of the standard February 2024 release.