

UMSUG paper – Clarification of Licensed Distribution System Operator and Unmetered Supply Operator roles in BSCP520

1. Purpose

This document is proposing changes to BSCP520 Unmetered Supplies Registered in SMRS¹, that will clarify the split of responsibilities for Unmetered Supplies between the Licensed Distribution System Operator (LDSO) and the Unmetered Supplies Operator (UMSO).

The opportunity has also been taken to make some other changes to the wording of BSCP520 to remove inconsistencies and/or reflect current practice.

2. Rationale

The current version of BSCP520 uses both the LDSO and UMSO acronyms in its text but the wording is such that it is not always clear whether actions are being undertaken by the LDSO or the UMSO. In addition, the interaction between the LDSO and the UMSO to enable Unmetered Supplies to be managed is not clearly documented.

An example of this is the allocation of MPANs for Unmetered Supplies. Currently BSCP520 shows the UMSO requesting an MPAN from SMRS. BSCP501 requires LDSOs to allocate MPANs and notify Supplier Meter Registration Service of the MPANs raised for new supplies. In the case of Unmetered Supplies, the LDSO is responsible for notifying the UMSO of the MPANs raised.

3. Changes for LDSO/UMSO role split

A redlined version of BSCP520 is appended to this document showing the proposed changes in full. The following is a summary of the changes referenced by section number (new numbering where applicable).

- 1.1.1 The parties to a Connection Agreement are the Customer and the LDSO. The proposed change clarifies that the UMSO is acting on behalf of the LDSO in establishing a Connection Agreement.
- 1.2 The LDSO has been added as a user of the BSCP and a split of responsibilities between the LDSO and the UMSO introduced. BSCP520 is currently fairly silent on the LDSO role, many of the implicit responsibilities are now documented in this proposed change such as the requirement in BSCP520 to notify the UMSO of changes to SMRS data.
- 3.1 This section deals with the establishment of a new inventory. The proposed changes show the UMSO requesting new MPANs from the LDSO and the LDSO notifying SMRS, with the new MPAN being sent to the UMSO by the LDSO rather than the SMRS.
- 3.2 An amendment to an inventory may require the creation of a new MPAN. The process for creation of an MPAN is the same as 3.1 above.
- 3.7 The change of energisation status is currently initiated by “as required or receipt of a D0134”. In practice it will be initiated either by the actions of the LDSO or the customer and will not require a D0134.

¹ <https://www.elexon.co.uk/csd/bscp520-unmetered-supplies-registered-in-smrs/>

- 3.8 Disconnection of an MPAN should be controlled by the UMSO who will be best placed to identify whether an MPAN is no longer required. Physical disconnection of items connected to the network may be carried out by the LDSO, but unless *all* items in an inventory are disconnected the MPAN will still be required. However, in the event that an MPAN is no longer required it is the LDSO that notifies the SMRS of the disconnection.
- 4.5.4 Clarification that the UMSO agrees the inventory on behalf of the LDSO and makes any consumption adjustments following an inventory audit.

4. Other proposed changes

The opportunity has also been taken to make some other changes to the wording of BSCP520 to remove inconsistencies and/or reflect current practice.

- 1.1.1 Introduction of a new paragraph placing an obligation on the UMSO to record and use MDD data. This appears to be missing from BSCP520, this new requirement is consistent with the same obligation on Meter Administrators.
- 1.2.3 The ability for the Supplier to submit the EAC to the NHHDC has been removed. See comments at 3.11 below.
- 1.4 There is a statement in this section that says the UMSO can only send and receive flows using the DTS role code. This is no longer correct (D0052 & D0310), the subsequent paragraph has been amended accordingly.
- 3.3 It is proposed to remove the first two steps in this process for both half hourly and non-half hourly trading as the steps are not used. The later steps requiring the UMSO to send a summary inventory on change of DC are also not used as the Meter Administrator will already have a Summary Inventory in place that can continue to be used until the customer next updates the detailed inventory.
- 3.3.2.7 It is understood that it is the practice of UMSOs to send a D0052 to the new Supplier and to the NHHDC to ensure that the NHHDC has the details of the correct EAC in place. This redrafting reflects that established best practice.
- 3.4 The Change of MA process did not include a requirement to send an appointment flow to the MA. In addition, there was no opportunity for the MA to reject the summary inventory or control file if errors were found with either.
- 3.5 The change here is the same as at 3.3.2.7 ensuring that the correct EAC is in place on change of NHHDC
- 3.9.1.3 Removal of the reference to the D0004 as the flow cannot be sent via the DTS as it relies on a Meter Serial ID, which is not available in UMS.
- 3.9.2 Change to clarify that a D0052 is sent on new connection or change of inventory detail resulting in a new EAC. The annual spreadsheet process is dealt with at 3.11. As currently drafted it could be mis-interpreted that a D0052 is required for every MPAN featuring on the annual spreadsheet.
- 3.11 It should only be the UMSO sending the correct EAC on a D0052 flow. The change also introduces a timescale for sending the D0052 following a request from the Supplier. The footnote that specified that a D0052 received from the UMSO should be used in preference has been removed to reflect the change above.

Throughout the interface timetables the method of communication has been amended to "Electronic or other agreed method" (where applicable) to remove inconsistencies.

If these changes are progressed then consequential changes to BSCP537 – Qualification Process for SVA Parties, SVA Party Agents and CVA Meter Operators, Appendix 1 - Self Assessment Document² will be required.

5. Recommendation

The UMSUG is invited to:

- **Review** the proposed changes to BSCP520,
- **Recommend** to SVG that a CP is raised to make the proposed changes to BSCP520.

We would like to record our thanks to Ryan Parker, WPD UMSO & Paul Angus, SSEPD UMSO for their assistance in drafting these proposals.

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² <https://www.elexon.co.uk/csd/bscp537-qualification-appendix-1-self-assessment-document-sad/>