

P317 'Changes to the Unmetered Supplies obligations in the BSC'

BSC Section S provides details of the Unmetered Supply (UMS) arrangements and obligations. Recent changes to the responsibilities of Licence Distribution System Operators (LDSOs) and the Party Agent role of Meter Administrator (MA) mean that some of the wording in BSC Section S relating to UMS is outdated. P317 therefore seeks to remove this outdated wording and better align the BSC with current working practice.



The BSC Panel initially recommends that P317 should be **approved** as a Self-Governance Modification Proposal

This Modification is expected to impact:

- LDSOs
- MAs

Phase

Initial Written Assessment

Definition Procedure

Assessment Procedure

Report Phase

Implementation

236/06

P317
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Page 1 of 13

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Contents

1	Summary	3
2	Why Change?	4
3	Solution	5
4	Impacts & Costs	6
5	Implementation	7
6	Panel's Initial Discussions	8
7	Report Phase Consultation Responses	9
8	Recommendations	11
	Appendix 2: Estimated Progression Effort	12
	Appendix 3: Glossary & References	13

About This Document

This is the P317 Draft Modification Report, which ELEXON will present to the Panel at its meeting on 9 April 2015. It includes the responses received to the Report Phase Consultation on the Panel's initial recommendations. The Panel will consider all responses, and will agree a final recommendation to the Authority on whether or not the change should be treated as a Self-Governance Modification and if it should be approved or rejected.

There are three parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, benefits, drawbacks and proposed implementation approach.
- Attachment A contains the draft redlined changes to the BSC for P317.
- Attachment C contains the full responses received to the Panel's Report Phase Consultation.

236/06

P317
Draft Modification Report

2 April 2015

Version 1.0

Page 2 of 13

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Why Change?

BSC Section S provides details of the UMS arrangements and obligations. Recent changes to the responsibilities of LDSOs and MAs mean that some of the wording in BSC Section S relating to UMS is outdated and no longer needed.

Solution

This Modification seeks to remove redundant text from BSC Section S relating to the UMS arrangements.

Impacts & Costs

There have been no implementation impacts or costs on BSC Parties or Party Agents identified. However, there may be changes required to internal documentation to reflect the changes to BSC Section S.

Implementation

The Panel recommends an Implementation Date for P317 of **25 June 2015**, as part of the June 2015 BSC Release.

Recommendation

The Panel initially recommends that P317 should be approved as a Self-Governance Modification Proposal.

2 Why Change?

What is an Unmetered Supply?

A **UMS** is any apparatus that draws a current and is connected to the distribution network without a Meter recording its energy consumption. UMS exists in the Half Hourly (HH) and Non-Half Hourly (NHH) Supplier Volume Allocation (SVA) markets.

Details of the UMS processes and obligations are contained in [BSC Section S 'Supplier Volume Allocation'](#) and BSC Procedure 520 (BSCP520) ['Unmetered Supplies Registered in SMRS'](#).

What is an Equivalent Meter?

An Equivalent Meter (EM) means, in relation to a UMS, the hardware and software that is used to calculate the HH consumption of electricity associated with a UMS.

There are two types of EM:

- passive Meters, which allocate the unmetered consumption across HH periods by looking at the mathematical relationship between annual burning hours compared to the daily time of sunrise and sunset; and
- dynamic Meters, which allocate the unmetered consumption across HH periods by referencing the operational number of Photo Electric Cell Unit Array (PECUs), or by making use of actual switching times reported by a Central Management System (CMS)¹.

What is the issue?

The P317 Proposer has identified issues with wording in BSC Section S relating to the UMS arrangements. Recent changes to the responsibilities of LDSOs and MAs, in relation to UMS, means that some of the wording in Section S is now outdated and redundant.

The P317 Proposer therefore seeks to remove this outdated wording and better align the BSC with current working practice (the lower level details of which are already detailed in BSCP520).



What is a Photo Electric Cell Unit Array?

A PECU Array is the device, containing approximately 30 PECUs that the MA contacts to ascertain the local switching times for certain HH UMS customers.

¹ Central Management Systems, also known as telemanagement, are the next step in remote dynamic street lighting control.

Proposed solution

[P317 'Changes to the Unmetered Supplies obligations in the BSC'](#) was raised by Electricity North West on 8 January 2015. This Modification seeks to remove redundant text from the BSC relating to the UMS arrangements.

P317 proposes to remove paragraphs 8.2.7 – 8.2.10 inclusive from BSC Section S as they are now outdated for the following reasons:

- **8.2.7** – *“Upon request by a Supplier or the Panel, a Licensed Distribution System Operator shall notify it in writing of one or more Equivalent Meters to be used on its Distribution System or Associated Distribution System for the purpose of calculating consumption associated with an Equivalent Unmetered Supply.”*
 - Paragraph 8.2.7 is now outdated as current working practice allows the UMS Operator (UMSO)² to specify dynamic or passive trading on a Metering System Identifier (MSID) by MSID basis (as detailed in BSCP520). The UMSO is responsible for looking after all of the UMS on its Network.
- **8.2.8** – *“A Licensed Distribution System Operator shall be entitled to change its nomination of an Equivalent Meter from time to time provided that it gives at least one year’s prior written notice of such change to the Panel.”*
- **8.2.9** – *“The Panel shall, on request by a Supplier, provide details of the Equivalent Meter used or to be used by a Licensed Distribution System Operator, as notified to the Panel by that Licensed Distribution System Operator pursuant to paragraph 8.2.7 and 8.2.8.”*
 - Paragraphs 8.2.8 and 8.2.9 are no longer required as the EM is part of the MA’s qualified system and therefore not determined by the LDSO. BSCP520 also sets out that the BSC Panel approves EMs. If requested, the UMSO shall advise the Panel of the EMs to be used on its Distribution System, and will provide 1 year’s written notice to the Panel if the EM is to be changed. The Panel will provide details of the EM used by an UMSO to a Supplier if requested.
- **8.2.10** – *“If an Equivalent Meter requires one or more photo electric cell unit arrays to function properly, then the Licensed Distribution System Operator which nominated the Equivalent Meter shall agree with any relevant Supplier the location(s) of such photo electric cell unit array(s).”*
 - Paragraph 8.2.10 is now outdated as current working practice, detailed in BSCP520, has been changed to clarify the responsibilities for agreeing the location of PECU Arrays.

Legal text changes

Full details of the draft legal text changes to BSC Section S for P317 can be found in Attachment A.

² The UMSO is part of the LDSO, also known as the Distribution Business or Network Operator. The UMSO is responsible for looking after all of the Unmetered Supplies on its Network. The UMSO makes new connections and decides what equipment is suitable for treatment as an Unmetered Supply. The UMSO provides a summarised inventory to the MA for Half Hourly traded UMS or calculates an Estimated Annual Consumption (EAC) for Non Half Hourly traded UMS.

Estimated central implementation costs of P317

The central implementation costs for P317 are minor and equate to approximately £240 (one man day) for ELEXON to implement the required changes to BSC Section S.

Indicative industry costs of P317

There are no implementation impacts on BSC Parties or Party Agents for P317. We therefore do not anticipate any industry costs to be incurred to implement the Modification should it be approved. Respondents to the Report Phase Consultation indicated that there would be no costs incurred due to the implementation of P317.

P317 impacts

Impact on BSC Parties and Party Agents

No implementation impacts on BSC Parties or Party Agents have been identified. However, there may be changes required to internal documentation to reflect the changes to BSC Section S.

Impact on Transmission Company

We do not anticipate an impact on the Transmission Company.

Impact on BSCCo

ELEXON will be impacted through the implementation of the changes to BSC Section S.

Impact on BSC Systems and processes

There are no impacts on BSC Systems or processes.

Impact on Code

Code Section	Potential Impact
Section S	Changes will be required to implement P317.

Recommended Implementation Date

The Panel initially recommends an Implementation Date for P317 of:

- **25 June 2015**, as part of the June 2015 BSC Release.

There are no participant or system impacts anticipated as P317 only seeks to remove text from the BSC that is no longer required. Therefore implementation of this Modification in June 2015 is appropriate as very little lead time is required.

Panel's consideration of the proposed progression

The Panel initially unanimously agreed with the recommendation that P317 should be treated as a Self-Governance Modification Proposal as it has no material impact on:

- consumers;
- competition;
- the Transmission System; and/or
- BSC governance.

The Panel noted that there are no implementation impacts to Parties or Party Agents anticipated as the Modification only seeks to remove wording from BSC Section S that is now outdated and redundant. The Panel therefore unanimously agreed that P317 should be sent directly into the Report Phase.

Implementation approach

The Panel initially unanimously agreed with the recommended Implementation Date for P317 of:

- **25 June 2015** as part of the June 2015 BSC Release.

Legal text changes

The Panel initially unanimously agreed that the draft legal text changes to BSC Section S deliver the intention of P317. Full details of the proposed legal text changes can be found in Attachment A.

Panel's initial views against the Applicable BSC Objectives

The Panel initially unanimously agreed with the Proposer's view that P317 would better facilitate Applicable BSC Objective (d), for the reasons set out below:

- **Objective (d):** P317 seeks to remove redundant text from the BSC relating to the UMS arrangements which have not been updated since the obligations on LDSOs and the Party Agent role of MA were changed in BSCP520. Removing this outdated text promotes efficiency in the implementation of the balancing and settlement arrangements.

The Panel therefore initially unanimously recommended that P317 be approved as a Self-Governance Modification Proposal.

7 Report Phase Consultation Responses

This section summarises the responses to the Panel's Report Phase Consultation on its initial recommendations. ELEXON received six responses to the P317 Report Phase Consultation. The roles indicated by Respondents are as follows:

- Distributor (three)
- Supplier Agent (one)
- Generator/Supplier (one)
- Generator/Supplier/Interconnector User (one)

You can find the full responses in Attachment B.

Summary of P317 Report Phase Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the Panel's initial unanimous recommendation that P317 should be approved?	5	1	0	0
Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P317?	6	0	0	0
Do you agree with the Panel's recommended Implementation Date?	5	0	1	0
Do you agree with the Panel's initial view that P317 should be treated as a Self-Governance Modification?	5	0	1	0
Will P317 impact your organisation?	2	3	1	0
Will your organisation incur any costs in implementing P317?	0	5	1	0

Should P317 be approved?

The **majority** of respondents (5 out of 6) **agreed** with the Panel's initial recommendation that P317 should be approved.

Some respondents agree that the removal of the outdated and redundant text from the BSC will better facilitate Applicable BSC Objective (d). One respondent noted that removing this text will also remove ambiguity between documents. Another respondent stated that P317 will ensure the LDSO and MA obligations are clearly reflected, promoting efficiency. One respondent believes that P317 addresses a housekeeping issue and will have no impact on the actual UMS processes.

One respondent who supported the implementation of P317 added that they do not accept that BSC text should always be aligned to fit working practice (in certain circumstances the opposite may be true). However, in this specific case they agree that it is warranted and provides a more efficient outcome.

236/06

P317
Draft Modification Report

2 April 2015

Version 1.0

Page 9 of 13

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A **minority** of respondents (1 out of 6) **disagreed** with the Panel's initial recommendation and believe that P317 should not be approved.

The respondent believes that there is insufficient information to establish whether there is a benefit in removing the BSC paragraphs, as per the proposed solution. They added that these paragraphs provide what seem to be reasonable obligations on LDSOs to provide information on request from the Panel or Suppliers, and updates on UMS.

Should P317 be treated as a Self-Governance Modification Proposal?

The **majority** of respondents (5 out of 6) **agreed** with the Panel's initial view that P317 should be treated as a Self-Governance Modification Proposal.

Respondents noted that P317 only intends to remove outdated text from the BSC and will not have a material effect, neither will it discriminate between different classes of Party and therefore fulfils the Self-Governance Criteria.

A **minority** of respondents (1 out of 6) had a **neutral** view as to whether P317 should be treated as a Self-Governance Modification Proposal. The respondent notes that there is insufficient information on the full impact of removing obligations on LDSOs and therefore cannot determine if the Modification meets the Self-Governance Criteria.

Implementation approach

The **majority** of respondents (5 out of 6) agreed with the Panel's recommended Implementation Date. Three respondents that supported the implementation approach did not provide rational.

One respondent notes that P317 is only removing outdated text from the BSC and will not impact participants or their systems and therefore believes that an Implementation Date of 25 June 2015 is appropriate.

One respondent had a **neutral** view on the proposed implementation approach and did not provide rational.

Legal text changes

All respondents to the Report Phase Consultation agreed with the Panel's view that the draft redlined changes to the BSC deliver the intention of P317.

8 Recommendations

We invite the Panel to:

- **AGREE** that P317:
 - **DOES** better facilitate Applicable BSC Objective (d);
- **DETERMINE** (in the absence of any Authority direction) that P317 is a Self-Governance Modification Proposal;
- **APPROVE** P317;
- **APPROVE** an Implementation Date of:
 - 25 June 2015;
- **APPROVE** the draft legal text; and
- Either:
 - **APPROVE** the P317 Modification Report; or
 - **INSTRUCT** the Modification Secretary to make such changes to the report as the Panel may specify.

Appendix 2: Estimated Progression Effort

The following tables contain the estimated effort in progressing P317:

Assessment Effort	
Participant	Effort (man days)
ELEXON	8
Total	8

Consultation Response Effort	
Consultation	No. of responses
Report Phase Consultation	6
Total	6

Appendix 3: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronym	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CMS	Central Management System
EM	Equivalent Meter
HH	Half Hourly
LDSO	Licensed Distribution System Operator
MA	Meter Administrator
MSID	Metering System Identifier
NHH	Non Half Hourly
OID	Operational Information Document
PECU	Photoelectric Cell Unit
SVA	Supplier Volume Allocation
UMS	Unmetered Supply
UMSO	Unmetered Supply Operator

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.

External Links		
Page(s)	Description	URL
3	Unmetered Supplies webpage	https://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/
3	BSC Sections webpage	https://www.elexon.co.uk/bsc-related-documents/balancing-settlement-code/bsc-sections/
3	BSCP webpage	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/6/?show=10&type=class
3	UMSUG webpage	https://www.elexon.co.uk/group/unmetered-supplies-user-group-umsug/
3	SVG webpage	https://www.elexon.co.uk/group/supplier-volume-allocation-group-svg/
3	OID webpage	https://www.elexon.co.uk/reference/technical-operations/unmetered-supplies/charge-codes-and-switch-regimes/
5	P317 webpage	https://www.elexon.co.uk/mod-proposal/53172/

236/06

P317
Draft Modification Report

2 April 2015

Version 1.0

Page 13 of 13

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