CP Progression Paper

CP1476 'Facilitation of Incremental LLFs'

ELEXON

Contents

About This Document

This document provides information on new Change Proposal (CP) CP1476 and outlines our proposed progression timetable for this change, including when it will be issued for CP Consultation in the next suitable Change Proposal Circular (CPC) batch.

We are presenting this paper to capture any comments or questions from Imbalance Settlement Group (ISG) and Supplier Volume Allocation Group (SVG) Members on this CP before we issue it for consultation.

There are three parts to this document:

- This is the main document. It provides a summary of the solution, impacts, anticipated costs, and proposed implementation approach, as well as our proposed progression approach for this CP.

- Attachment A contains the CP1476 proposal form.

- Attachment B contains the proposed redlined changes to deliver the CP1476 solution.

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Current process for Line Loss Factors

Balancing and Settlement Code Procedure (BSCP) 128 'Production, Submission, Audit and Approval of Line Loss Factors' requires all Licensed Distribution System Operators (LDSOs) to submit Line Loss Factor (LLF) data annually through the D0265 'Line Loss Factor Data File' data flow. This flow is received by Half Hourly Data Aggregators (HHDAs), Suppliers and the Supplier Volume Allocation Agent (SVAA). It contains a value for every Settlement Period for every Settlement Day (17,520 values) per LLF Class (LLFC).

BSCP128 also requires a full data refresh for any other mid-year change to the LLF data. This is known as a mid-year submission. The mid-year submission procedure follows the same rules as the annual submission set out in BSCP128. A mid-year submission may be required for:

- the creation of a new LLF;

- an amendment to an existing LLF; or

- the deletion of an existing LLF.

What is the issue?

The D0265 flow can hold large volumes of Settlement Period data for potentially thousands of LLFCs, which can equate to millions of rows of information. This means that, if an LDSO requires an additional LLFC, the entire data set must be re-submitted in order for the submission to be compliant with the BSCP. ELEXON must then review and audit the entire mid-year submission data set, including new and existing submissions. This process is in place to ensure data accuracy for new and existing records which can potentially change due to human error. This procedure can be time consuming and inefficient due to the nature of the D0265 flow and the high level of scrutiny involved.

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2   Solution

Proposed solution

ELEXON raised CP1476 'Facilitation of Incremental LLFs' on 27 October 2016. It proposes to amend BSCP128 Appendix 7 to allow LDSOs the option to submit incremental changes to their LLF data set. The incremental change will allow the LDSOs to submit partial D0265 flows. This partial submission can contain just the LLFC the LDSOs wants to submit, which could be the creation of a new LLFC, end dating of LLFC or amending an LLF value. This change will mean a D0265 flow could contain far less information that a full submission, which can contain millions of rows of data. LDSOs will still have the option to submit full data sets if they do not have the measures in place to submit incremental files.

Proposer's rationale

The volume of information contained within a D0265 flow is large and hard to manipulate. ELEXON does not possess the tools to manipulate the millions of rows of data contained within the D0265. If an error occurs, ELEXON relies on the LDSO to make the changes. These can be difficult to complete within the required timescales since these are linked to Market Domain Data Releases and SVG meetings. When an LDSO submits a mid-year submission, the entire file is required (as per BSCP128). Compiling and reviewing the submission can be laborious and time consuming due to the sheer quantity of data held within the files. The process involves loading the D0265, which can take from three to five hours, then validating the output against the calculation documents and methodology. In total the process can take up to two Working Days for a full review process. ELEXON is required to fully validate and audit each LLF submission, even if the submission only includes a single amendment.

Updating BSCP128 Appendix 7 to include incremental LLFs will drastically reduce the time and effort required to create, load, validate and upload the D0265 file.

Proposed redlining

Attachment A contains the proposed changes to BSCP128 Appendix 7 to deliver CP1476.

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3 Impacts and Costs

Central impacts and costs

CP1476 will require changes to BSCP128 Appendix 7. No system changes are required and there will be no impact on BSC Agents.

As BSCP128 Appendix 7 is jointly owned by the ISG and SVG, we are presenting it to both committees for their initial comments.

Central Impacts	
Document Impacts	System Impacts
• BSCP128 Appendix 7	*None*

Central costs

The central implementation costs for CP1476 will be approximately £240 (one ELEXON man day) to implement the relevant document changes[1].

BSC Party & Party Agent impacts and costs

CP1476 is expected to impact LDSOs and ELEXON only. LDSOs will gain the option to submit a partial file for mid-year submission. We believe that minor process changes will be required to implement the solution; however it will not require any additional resource from ELEXON.

No other BSC Parties or Party Agents are expected to be impacted but we seek confirmation of this through this CP Consultation.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Distributors	Changes will be required to implement the solution
ELEXON	

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[1] ELEXON already has the ability to process incremental LLFs.

4   Implementation Approach

Recommended Implementation Date

CP1476 is proposed for implementation on **29 June 2017** as part of the June 2017 BSC Systems Release.

The June 2017 Release is the next available Release that can include this CP.

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5 Proposed Progression

Progression timetable

The table below outlines the proposed progression plan for CP1476:

Progression Timetable	
Event	Date
CP Progression Paper presented to ISG for information	22 Nov 16
CP Progression Paper presented to SVG for information	06 Dec 16
CP Consultation	12 Dec 16 – 6 Jan 17
CP Assessment Report presented to ISG for decision	24 Jan 17
CP Assessment Report presented to SVG for decision	31 Jan 17
Proposed Implementation Date	29 Jun 17 (June 17 Release)

CP Consultation questions

In addition to the standard CP Consultation questions for CP1476, we intend to ask an additional question as outlined below.

Standard CP Consultation Questions
Do you agree with the CP1476 proposed solution?
Do you agree that the draft redlining delivers the CP1476 proposed solution?
Will CP1476 impact your organisation?
Will your organisation incur any costs in implementing CP1476?
Do you agree with the proposed implementation approach for CP1476?

Additional CP Consultation Questions
Would CP1476 impact Suppliers' and Data Aggregators' ability to access and download the D0265?

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6 Initial Committee Views

ISG's initial views

The ISG considered CP1476 at its meeting on 22 November 2016 ([187/03](#)).

An ISG Member queried how ELEXON will ensure that, following the submission of the incremental LLFs, the previous data submitted will not be corrupted. ELEXON explained the process for loading the incremental file, which takes the newly proposed, end dated or amended LLFC/LLFs and appends/removes it to/from the LDSO's already approved D0265. This process negates the risk which can currently exist with a full file submission which can contain millions of rows of data.

An ISG Member questioned how other users would be affected, as the version of the D0265 that is available on the Portal is the SVAA version, but Distributors can send this directly to Suppliers, SVAA and HHDAs.

Another ISG Member responded that ELEXON provides the D0265 to the recipient. The LDSO sends the data flow to ELEXON, and then ELEXON validates the data flow, which is published on the ELEXON Portal. Therefore, customers rely only on ELEXON to get the D0265. Master Registration Agreement (MRA) Data Transfer Catalogue (DTC) CP 3497 'Housekeeping amendment to the D0265 Data Flow Notes' is removing the D0265 data flow's 'Notes' which state:

> 'In England and Wales, this information is not provided direct to participants by Distributors but is published on the BSC Website'.

This note will be removed because it is current operational practice for the ELEXON Portal to publish all the LDSO D0265 data flows for all of Great Britain. DTC CP 3497 will be implemented as part of the [MRA's February 2017 Release](#).

An ISG Member noted that the CP Progression Paper was not clear on how ELEXON will deal with new, removed and changed LLFs. The ISG Member asked how ELEXON notifies parties when a change to the D0265 is made. ELEXON noted that the data is published on the ELEXON Portal and every time that there is a change, BSC Parties are notified ([ELEXON Portal User Guide](#)). In addition to this, ELEXON proposed to send a notification to the Industry through ELEXON's Newscast.

Another ISG Member queried if there will be any impact on Suppliers following the implementation of this CP. Suppliers download the full data file and the proposed solution may impact the ability of customers to download the D0265. ELEXON noted that there should not be any impact on Suppliers because the end result will still be a fully published D0265. Suppliers will be able to download the full data file even after the correction will be made by the incremental LLFs. ELEXON agreed to add a question into the CP Consultation to confirm this.

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7   Recommendations

We invite you to:

- **NOTE** that CP1476 has been raised;

- **NOTE** the proposed progression timetable for CP1476;

- **PROVIDE** any comments or additional questions for inclusion in the CP Consultation; and

- **NOTE** that CP1476 was presented to the ISG at its meeting on 22 November 2016.

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
BSCP	Balancing and Settlement Code Procedure
CP	Change Proposal
CPC	Change Proposal Circular
HHDA	Hourly Data Aggregator
ISG	Imbalance Settlement Group
LDSOs	Licensed Distribution System Operators
LLFC	LLF Class
LLFs	Line Loss Factors
SVA	Supplier Volume Allocation
SVAA	Supplier Volume Allocation Agent
SVG	Supplier Volume Allocation Group

DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

DTC Data Flows and Data Items	
Number	Name
D0265	Line Loss Factor Data File

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
2	BSCP page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
2	D0265 page on the MRA website	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0265&FlowVers=1&searchMockFlows=False
2	LLFs page on the ELEXON website	https://www.elexon.co.uk/glossary/line-loss-factor/
3	CP1476 page on the ELEXON website	https://www.elexon.co.uk/change-proposal/facilitation-incremental-llfs/

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External Links		
Page (s)	Description	URL
7	ISG187 page on the ELEXON website	https://www.elexon.co.uk/meeting/isg-187/
7	February 2017 Release page on the MRA website	https://www.mrasco.com/change-proposals/mra-change-release-information/23rd-february-2017
7	ELEXON Portal on the ELEXON website	https://www.elexonportal.co.uk/article/view/170?cachebust=fncl9l5s7m

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