

CP Assessment Report

CP1483 'Changes to BSCP550 – shared metering arrangements'

ELEXON



Committee

Supplier Volume Allocation Group

Recommendation

Approve

Implementation Date

2 November 2017
(November 2017 Release)



Contact

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SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 1 of 14

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Contents

1	Why Change?	2
2	Solution	3
3	Impacts and Costs	4
4	Implementation Approach	5
5	Initial Committee Views	6
6	Industry Views	7
7	Recommendations	8
	Appendix 1: Glossary & References	9

About This Document

This document is the Change Proposal (CP) Assessment Report for CP1483 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 4 April 2017. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1483.

There are three 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 proposed redlined changes to deliver the CP1483 solution.
- Attachment B contains the full responses received to the CP Consultation.



What is the current process?

The current shared metering process enables two or more Suppliers to agree an allocation schedule. This splits the Active Energy measured by the Shared Supplier Volume Allocation (SVA) Metering System for each Settlement Period between two or more Suppliers. It is done such that the net energy allocated to the Suppliers is equal to such metered Active Energy. This allocation schedule is hence used by the Half Hourly Data Collector (HHDC) to allocate energy to each Supplier of a single, shared Boundary Point Metering System.

There are several options available for Suppliers to 'split' the energy allocated to a Boundary Point Metering System and the key information to do this is contained within the allocation schedule. Currently Party Agents may only receive the allocation schedule at the end of the process (by Gate Closure) as this is the requirement within [Balancing and Settlement Code Procedure \(BSCP\) 550 'Shared SVA Meter Arrangement of Half Hourly Import and Export Active Energy'](#).

What is the issue?

When a Meter is shared by two or more Suppliers, the point at which Suppliers are required to appoint their Agents to a shared metering system (i.e. at least 5 WDs before the appointment date), it is unlikely the Primary Supplier has shared the allocation schedule for the Metering System. This makes it difficult for the Meter Operator Agent (MOA) and the HHDC to assist Suppliers by highlighting potential issues (e.g. how the energy is split and how the meters will be reconciled) before the appointment becomes effective. Due to this, the current process can result in errors, particularly those occurring after Gate Closure which are difficult to correct. This adds complications for all parties involved, that could have been prevented had the Supplier Agents been appointed at an earlier stage.

Boundary Point Metering System

A Metering System that measures Exports or Imports of flows of electricity at a Boundary Point (a point at which any Plant or Apparatus not forming part of the Total System is connected to the Total System).

Proposed solution

ELEXON raised [CP1483 'Changes to BSCP550 – Shared Metering Arrangements'](#) on 18 January 2017. The CP proposes to make it a requirement for Suppliers to inform their Agents of the allocation schedule earlier at the time of Agent appointments and at least five working days before the appointment date, rather than by Gate Closure. For clarification, this will only be for new shared metering system arrangements, or where new Agents are appointed to existing sites. Overall, it is anticipated that these amendments will improve the efficiency of the process and reduce errors.

CP1483 will bring forward the requirement for the provision of the initial allocation schedule and supporting technical information, to the time of Agent appointment, within the following BSCP550 processes:

- 3.1 'New connection or Transfer from CMRS (Central Meter Registration Service) to SMRS (Supplier Meter Registration Service)';
- 3.2 'Single to Shared SVA Metering System';
- 3.3 'Change of HHDC for an Existing Shared SVA Metering System'; and
- 3.4 'Change of Meter Operator Agent for an Existing Shared SVA Metering System'.

Additional areas requiring further clarification:

The proposed solution to CP1483 also corrects a number of errors identified in BSCP550.

- The first correction changes the BSCP so that it no longer implies that the HHDC is able to arbitrarily change the effective dates of Metering Systems;
- The second correction (in Section 4.8) removes text enabling the HHDC to terminate its appointment without instruction from the Supplier; and
- Lastly, an obligation from the process steps on the MOA, HHDC and HH Data Aggregator (HHDA) that has insufficient detail will be moved and clarified in a different section as shown in Attachment A, which contains details of all redlined proposed changes to BSCP550. Section 1.2 and relevant in timetable

Proposer's rationale

ELEXON believes that the proposed solution will make it easier for the MOA and the HHDC to assist Suppliers by highlighting potential issues earlier in the appointment process for shared metering arrangements, and thus reducing the need for retrospective resolution.

Proposed redlining

Attachment A contains the proposed redlined changes to BSCP550 to deliver the CP1483 solution.

3 Impacts and Costs

Central impacts and costs

CP1483 will require document only changes to BSCP550. No Central Systems changes are required.

Central Impacts	
Document Impacts	System Impacts
<ul style="list-style-type: none">BSCP550	<i>None</i>

Central costs

The central implementation costs for CP1483 will be approximately **£240** (one ELEXON Working Day) to implement the relevant document changes.

BSC Party & Party Agent impacts and costs

CP1483 is expected to impact Suppliers, HHDC's and HHMOA's only. In the industry consultation only minor process and system changes were identified to implement the proposed solution and the costs are expected to be minimal.

No other BSC Parties or Party Agents are expected to be impacted by the proposed solution to CP1483.

BSC Party & Party Agent Impacts	
BSC Party/Party Agent	Impact
Suppliers	This will have a minor impact on processes and systems.
HHDC's	
HHMOA's	

4 Implementation Approach

Recommended Implementation Date

CP1483 is proposed for implementation on **2 November 2017**, as part of the November 2017 BSC Release. This is the next available Release that this CP can be included in.

SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 5 of 14

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SVG's initial views

The CP progression paper for CP1483 was presented to the SVG at its meeting on 31 January 2017 ([SVG192/04](#)).

The SVG acknowledged the issue with the current process and a number of further points were discussed:

- Firstly, an SVG member asked about the scale and origin of the issue. ELEXON confirmed that CP1483 originated as a concern discussed at the Performance Assurance Board (PAB) regarding Settlement Risks for new potential sites, particularly as errors occurring after Gate Closure are difficult to correct. ELEXON indicated that the scale of the issue is small as there are less than 10 known shared metering arrangement sites in the UK¹. However, these numbers may increase and hence it is important to rectify the issue before it becomes more prevalent.
- Secondly, an SVG member expressed support for the proposal and noted that their company had experienced the issue identified and will be providing examples during the consultation phase in order to provide more clarity on the issue.
- Lastly, an SVG member noted that an early implementation date would be preferable so that potential issues can be avoided sooner. ELEXON welcomed Parties' views on the feasibility of an earlier implementation date, on 29 June 2017, and the priority they would assign to this. The consultation found that there is little appetite for an earlier implementation date as only two of seven respondents were open to it, while all respondents were happy for the implementation date to remain on 2 November 2017.

SVG194/03

CP1483

CP Assessment Report

27 March 2017

Version 1.0

Page 6 of 14

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¹ Results of an ELEXON request for information from HHDC in August 2016

6 Industry Views

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

Summary of CP1483 CP Consultation Responses				
Question	Yes	No	Neutral/ No Comment	Other
Do you agree with the CP1483 proposed solution?	6	1	0	0
Do you agree that the draft redlining delivers the intent of CP1483?	6	1	0	0
Will CP1483 impact your organisation?	7	0	0	0
Will your organisation incur any costs in implementing CP1483?	4	3	0	0
Do you agree with the proposed implementation approach for CP1483?	7	0	0	0

There were seven respondents to the CP Consultation and six of them agreed with the proposed solution and its redlining.

Please note that initially a respondent disagreed with the redlining due to concerns that CP1483 does not address wider issues concerning shared metering arrangements (see IMServ response to Question 5 in attachment B for details) and this view was published on 13 March 2017. However, ELEXON has discussed these concerns with the respondent and have planned to establish an Issue Group to address these concerns because they are beyond the scope of this CP and the issue is not fully known. The respondent subsequently confirmed with ELEXON that their negative response to the redline changes was due to the fact that the redlining did not deal with the broader issues they had identified. The respondent now agrees that the proposed redlining does deliver the proposed solution as set out in CP1483 and this is reflected in the above table.

The respondent that disagreed with the CP1483 proposed solution and its redlining did so on the bases that changing a requirement for the MOA, HHDC and HHDA to confirm appointment details are correct 'within two Working Days' to 'best endeavours' is a backward step. ELEXON has discussed this concern with the respondent and explained that the old requirement of confirming appointment details is not practical and clear enough to deliver a meaningful obligation and the proposed changes additionally give the MOA, HHDC and HHDA more flexibility to deal with issues as and when they arise. The respondent disagreed that greater flexibility is beneficial and concluded that they maintain their original view.

The impacts and costs of this CP were all viewed to be minimal by the respondents. All respondents believed there will be some impact, but that this will involve minor changes. Similarly, the four respondents that anticipate costs in implementing CP1483 believe these will only be minor. Finally, all respondents agreed with the implementation approach for CP1483.

Please note that specific comments and ELEXON's responses on the proposed redlining are included in Appendix 2.

SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 7 of 14

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7 Recommendations

We invite you to:

- **AGREE** the amendments to the proposed redlining for BSCP550 for CP1483 made following the CP Consultation;
- **APPROVE** the proposed changes to BSCP550 for CP1483; and
- **APPROVE** CP1483 for implementation on 2 November 2017 as part of the November 2017 Release.

SVG194/03

CP1483

CP Assessment Report

27 March 2017

Version 1.0

Page 8 of 14

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Appendix 1: Glossary & References

Acronyms

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

Acronyms	
Acronym	Definition
CMRS	Central Meter Registration Service
HHDA	Half Hourly Data Aggregator
HHDC	Half Hourly Data Collector
HHMOA	Half Hourly Meter Operator Agent
MOA	Meter Operator Agent
PAB	Performance Assurance Board (<i>Panel sub-Committee</i>)
SMRS	Supplier Meter Registration Service
SVG	Supplier Volume Allocation Group (<i>Panel sub-Committee</i>)

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
2,3,4	BSCPs page on the ELEXON website	https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/
3	CP1483 webpage	CP1483 'Changes to BSCP550 – shared metering arrangements'
7	SVG192	https://www.elexon.co.uk/meeting/svg-192/?from_url=https://www.elexon.co.uk/events-calendar-item/svg-192/

SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 9 of 14

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Appendix 2: Comments on the Proposed Redlining

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
BSCP550, page 6	<p>Could the paragraph commencing 'Where a new or modified allocation schedule...' be clarified? Is this trying to say that where the allocation between the Primary + Secondary MSIDs is wrong this cannot normally be corrected but where the total value is wrong this can be corrected (by following the estimation rules in BSCP502) therefore this can be retrospectively applied. Might be worth further clarification</p> <p>Also should approved Trading Disputes not allow for retrospective corrections? If so maybe text such as 'Except for Approved Trading disputes...' should be included?</p>	<p>The allocation schedule is sharing out Settlement data between Suppliers. If the schedule is incorrect then it is highly unlikely that Settlement will be impacted. If there is no Settlement error then there can be no corrections in Settlement.</p> <p>Trading Disputes are relevant for errors in Settlement in accordance with Section W of the BSC.</p>
BSCP550, 3.1.9 and a number of other sections	Should the sentence '(HHDC and Secondary Supplier(s) should receive the initial Allocation Schedule by Gate Closure)' now be removed throughout the document since this CP proposes that this takes place at least 5 WD before the appointment starts?	Yes and these references have been removed throughout the document.
BSCP550, 3.1.10	How does the HHDC know to expect an Allocation Schedule, what tells them this is a shared site?	This is an important question and will be assessed and addressed in the Issue group.
BSCP550, 3.1.19	Is this step required at all now, since all the previous activities must have been completed by this point (i.e. Gate Closure)?	No, this step is not required and has been removed from the redlining.
BSCP550, 3.2.1.10	This step states that the primary Supplier sends the HHDC appointment details. In this scenario, I thought it worth pointing out that it is possible that the HHDC has already been appointed by that Supplier under a standard none shared	<p>The section this refers to, 3.2, is for change of Supplier for an existing Shared Metering System. As such the Supplier will be new and would not have appointed the HHDC formally yet.</p> <p>The HHDC does not have to</p>

SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 10 of 14

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Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	<p>arrangement for a prior period. Is it intended that the Supplier has to send a further appointment, with an effective date aligned to the start date of the shared arrangement?</p> <p>Where this new start date < 5 WD in the future, if the HHDC is unaware it relates to a shared arrangement, they will typically just accept the appointment. Therefore, in order to deliver the intention of the CP, the HHDC must know that the site is shared before any D155s are sent.</p> <p>However, if the HHDC is aware that the incoming appointment does relate to a shared site, the appointment would be rejected and the existing appointment would continue, is this correct?</p>	<p>automatically accept the appointment. If this is material it can be looked at in the Issue group.</p> <p>Lastly, it is not the case that the appointment would be rejected if the HHDC is aware the incoming appointment relates to a shared site. This section of the procedure is for moving from a Single to Shared SVA Metering System, so such an action would not make sense.</p>
BSCP550, 3.1.8 to 3.1.14	<p>Please can this be clarified.</p> <p>If the Primary Supplier registers both primary and secondary MSIDs 5 WD before Appointment Start Date and the Secondary Supplier also has to give 5 WD notice before Appointment Start (3.1.14), how does this work?</p> <p>Step 3.1.11 has the Primary Supplier notifying the Secondary Supplier who the Agents are within 2 WD of 3.1.8. Surely this then doesn't allow the Secondary Supplier enough time to also give 5 WD notice when sending in their appointment.</p> <p>I guess this issue is also present under other registration activities.</p>	<p>This point is not related specifically to CP1483 but the current arrangements. This scenario will be worked through as part of the Issue as it is relevant to both the current and proposed changes.</p>
BSCP550, 3.2.3	<p>In the real world, on change of Supplier (either Primary or</p>	<p>It is difficult to predict what an incoming supplier's requirement</p>

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	Secondary) it is entirely likely that this would also trigger a co-incident change in Allocation schedule – this doesn't seem to have been captured?	may be. If there is a requirement to change the shared relationship them BSCP550 already covers this.
BSCP550, 3.2.6.9	<p>Does the primary Supplier only optionally need to terminate the HHDC appointment where a site reverts from shared to single Metering System so the words 'as required' could be added? The Supplier may want his Agent's appointment to continue.</p> <p>This also triggered me to think of the scenario where a Shared Metering System changes (say) from 2 Secondary Suppliers down to a single Secondary Supplier, has this process been covered?</p>	<p>The first step of the section, 3.2.6.1, states that "Following agreement with other Secondary Suppliers to terminate Shared Meter Arrangement". This implies that this has to be agreed with both parties and once agreed it is mandatory for the Primary supplier to revert back to a Single SVA Metering System.</p> <p>No, the process mentioned in the second paragraph has not been covered.</p>
BSCP550, 4.6	<p>A number of similar points follow, some of which could be resolved by adding in a phase such as 'The validation to be undertaken, on a best endeavours basis, by an HHDC shall be as follows:'</p> <p>I will describe why below.</p>	Similarly, answers are below.
BSCP550, 4.6.1	Obviously the HHDC can only do this if they have received a D268 on all the MPANs within the shared arrangement	Yes.
BSCP550, 4.6.2	How is this expected to be achieved?	This is not within the scope of this CP, but it can be looked at in the Issue group.
BSCP550, 4.6.3	Given under the initial registration process the HHDC verifies that the same MOP has been appointed to each MPAN within a Shared arrangement, are you suggesting that the HHDC has to continue to check this during the entirety of their appointment as HHDC, since HHMO appointments can change over time?	Yes, the HHDC will have to check the same MOA has been named for all appointments.

SVG194/03

CP1483
CP Assessment Report

27 March 2017

Version 1.0

Page 12 of 14

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Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	<p>By implication the HHDC then has to monitor D148s from Suppliers and the sender of every D268 we receive?</p> <p>Also, BSCP550 then doesn't state what the HHDC should do where should a discrepancy is found</p>	
BSCP550, 4.6.4	<p>Where an appointment is < 5 WD in the future, this step implies that such an appointment is rejected? If so this should be described in more detail under the interfaces and timetable sections, including the information required to be sent back to the Supplier(s) from the HHDC.</p>	<p>No, as it states: "Where the date is not 5 WDs ahead the HHDC shall request the Supplier to set the appointment dates to 5 WDs ahead of the latest appointment".</p>
BSCP550, 4.6.5	<p>What is meant by 'associated maintenance rules'</p>	<p>This is an erroneous reference and has been removed.</p>
BSCP550, 4.6.8	<p>I can understand why it might be sensible to assume that setting meter and pulse multipliers to zero will reduce the risk of potential double counting data and lead to less errors in Settlement data but this is too prescriptive and somewhat clumsy.</p> <p>Most modern meters do not store values in pulses so setting the pulse multiplier to zero would be irrelevant.</p> <p>If Suppliers and their HHDC take equally effective but alternative approaches to ensure data accuracy this should be sufficient. How this is achieved isn't important providing it is a robust, auditable, accurate approach.</p> <p>If the HHDC is collecting data under the Primary MPAN correctly and has a valid Allocation schedule, what relevance does a</p>	<p>We consider it is important to set the pulse multipliers of pseudo meters to zero. It means that data from these meters cannot inadvertently be Settled as they are only used to share out the volumes between Suppliers.</p>

Comments on the CP1483 Proposed Redlining		
Document & Location	Comment	ELEXON's Response
	pulse multiplier necessarily have on the values submitted under the Secondary MPAN(s)?	
BSCP550, 1.2	At the time of being appointed or de-appointed to a shared metering arrangement by a Supplier (Primary or Secondary) the MOA, HHDC and HHDA, as appropriate, shall use best endeavours to confirm that the appointment details are correct and consistent. Where there is an error in appointment details then these will be resolved with the relevant Supplier.	The MOA and HHDA are needed to confirm these details because they are equally affected.
Sections 3.1.9, 3.2.1.11 and 3.2.1.16	Reinstate process step but remove "HHDC" from the "From" column	These process steps are not needed because the MOA, HHDC and HHDA have been given 'best endeavours' to confirm.

SVG194/03

CP1483

CP Assessment Report

27 March 2017

Version 1.0

Page 14 of 14

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