

CP Consultation Responses

CP1522 'Updates to BSCP520 to align with working practices and UMSUG recommendations'



This CP Consultation was issued on Monday 11 November 2019 as part of CPC00799, with responses invited by Friday 6 December 2019.

Consultation Respondents

Respondent	No. of Parties/Non-	Role(s) Represented
UK Power Networks	1	Distributor
Fulcrum Electricity Assets Ltd	1	Distributor
Scottish Power	1	Supplier
Power Data Associates Ltd	1	Supplier Agent: Meter Administrator
Scottish Power Distribution, SP Manweb	2	BSC Party role: Distributor Non-Party role: UMSO
Western Power Distribution	1	Distributor
Northern Powergrid	1	Distributor

Summary of Consultation Responses

Respondent	Agree?	Impacted?	Costs?	Impl. Date?
UK Power Networks	✗	✓	✓	✓
Fulcrum Electricity Assets Ltd	✓	✓	✗	✓
Scottish Power	✗	✗	✗	✓
Power Data Associates Ltd	✓	✓	✓	✓
Scottish Power Distribution, SP Manweb	✓	✓	✓	✗
Western Power Distribution	✓	✗	✓	✓
Northern Powergrid	✓	✓	✗	✓

Question 1: Do you agree with the CP1522 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
5	2	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	No	More work required on fine tuning the red lined changes.
Fulcrum Electricity Assets Ltd	Yes	This will bring the BSCP520 in line with current industry processes and better defines the UMSO
Scottish Power	No	Agree with parts 1 & 2, however in part 3 have concerns regarding the lack of reference to any obligation on the UMSO. We would support this change if the UMSO also have a matching obligation to notify the supplier.
Power Data Associates Ltd	Yes	<p>We are pleased that following an UMSUG recommendation Elexon has raised this Change Proposal to remedy the issues identified by the UMSUG. Our rationale for each of the three areas identified by the UMS expert members of UMSUG is provided below.</p> <p>1. Reactive Power</p> <p>The removal of this obligation on Meter Administrators is appreciated. We have been aware that the watts and VA data associated with the unmetered charge codes is in some cases missing or invalid. When calculating the half hourly consumptions in an Equivalent Meter the lack of complete data for some older charge codes can produce erroneous reactive power consumptions.</p> <p>It has now been identified that the calculation of reactive power by the Meter Administrator serves no purpose and has no future use either under the BSC or the DUoS charging structure.</p> <p>2. Clarification of the split between the LDSO and UMSO roles.</p> <p>We welcome this clarification. In the current version of BSCP520 the activities of the LDSO and UMSO roles are not clearly distinguished. There is</p>

Respondent	Response	Rationale
		<p>no list of responsibilities for the LDSO and many actions that are clearly to be taken by the LDSO are described as being undertaken by the UMSO. It is accepted that within many organisations when dealing with unmetered supplies the roles of UMSO and LDSO will be carried out by the same team or people. The change does not seek to separate the roles, but more clearly identify whether the team is acting as the LDSO or UMSO. It is important that these different roles have clear responsibilities when fulfilling their obligations under the BSC to enable the roles to be separated if desired.</p> <p>In addition in many cases, the existing actions are inconsistent with other BSCPs, such as BSCP501 which correctly shows MSIDs being provided by the LDSO to SMRA, rather than BSCP520 incorrectly directing an UMSO to requesting MSID from SMRA. Similar issues arise in the area of energisation status changes and disconnections. The proposed solution will clearly identify when a Distribution Network Operator is acting as an LDSO or an UMSO, when fulfilling its obligations under the BSC.</p> <p>The other proposed changes document best practices that have been established over the years of operating unmetered supplies. Again they are not seeking to change practices and processes but clarify the split of responsibilities under the BSC arrangements and can be considered as "housekeeping".</p> <p>3. Related MSIDs</p> <p>In the unmetered world multiple MSIDs can be required for a single customer's inventory by virtue of the load profiles associated with the equipment, and as such are related.</p> <p>As part of the faster switching initiative it was established that SMRS needed to hold a marker that identified related MSIDs both in the metered and unmetered world. The marker is updated in SMRS by a flow from the Supplier, but it is the UMSO who will identify when MSIDs are related during the inventory processing activity.</p> <p>It is vital that a process exists for the Supplier to be notified of a relationship between MSIDs and update SMRS accordingly. Addition of this obligation for Suppliers will ensure that where a customer</p>

Respondent	Response	Rationale
		changes Supplier for an inventory of unmetered equipment all the related MSIDs will be registered by the new Supplier.
Scottish Power Distribution, SP Manweb	Yes	None provided.
Western Power Distribution	Yes	We agree and support the review of BSCP520 and the proposed solution.
Northern Powergrid	Yes	We agree with the proposal but we have some minor comments on the draft redlining, please see response to question 6.

Question 2: Do you agree that the draft redlining delivers the CP1522 proposed solution?

Summary

Yes	No	Neutral/No Comment	Other
3	4	0	0

Responses

A summary of the specific responses on the draft redlining can be found at the end of this document.

Respondent	Response	Rationale
UK Power Networks	No	Further work is required on the red lining.
Fulcrum Electricity Assets Ltd	Yes	None provided.
Scottish Power	No	As above, a clear obligation is required for the UMSO to notify the supplier of related MPANs
Power Data Associates Ltd	Yes	There are a few typos that need correcting as detailed in the section headed CP Redlined Text below, but otherwise agree that the draft redlining delivers the CP1522 proposed solution.
Scottish Power Distribution, SP Manweb	No	Please see comments detailed below.
Western Power Distribution	No	We agree that the draft red-lining delivers the CP1522 proposed solution. However, we believe that the requirements of the MRA MAP 29 (Agreed Procedure for Managing NHH Related Metering Points] should be included under Section 3.8 Disconnection of an MSID. MAP 29 requires that where an UMSO advises a Supplier of an end to a Related Metering Point, the Supplier should: <ol style="list-style-type: none">1. Assign a non-related MTC to each of the previously Related Metering Points2. Delete the Related Metering Point relationship by sending the D0386 data flow for the Primary MPAN, with a Relationship Action of "D" (Delete existing relationship) and a MPAN of "D" (Delete MPAN from relationship for each Secondary Metering Point in the relationship)

Respondent	Response	Rationale
		Consideration should also be given to the requirements of the CSS (Faster Switching). At CSS go live in 2021, the rules currently require that an MPAN cannot be disconnected if it is in a relationship and the disconnection will be rejected (although this is the subject of industry discussion under the Design Working Group for CSS).
Northern Powergrid	Yes	None provided.

Question 3: Will CP1522 impact your organisation?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	Yes	We are an LDSO, SMRA and an UMSO.
Fulcrum Electricity Assets Ltd	Yes	It will help with wider industry engagement to better define the roles between LDSO and UMSO
Scottish Power	No	None provided.
Power Data Associates Ltd	Yes	The changes will impact the Meter Administrator role but there are minimal changes that need to be undertaken as the changes for the most part are clarification of existing practices.
Scottish Power Distribution, SP Manweb	Yes	While the aim of the change is to tighten up the relationships between LDSOs, UMSO and SMRA it will require new internal processes to be put in place to manage these relationships.
Western Power Distribution	Yes	Yes, however the impact of CP1522 will be minimal process and documentation changes.
Northern Powergrid	Yes	There will be some modifications required to our processes to accommodate the proposed changes.

Question 4: Will your organisation incur any costs in implementing CP1522?

Summary

Yes	No	Neutral/No Comment	Other
4	3	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	Yes	The change proposal may impact current process and involve more resources.
Fulcrum Electricity Assets Ltd	No	None provided.
Scottish Power	No	None provided.
Power Data Associates Ltd	Yes	There is a cost to stop producing reactive data, but this is minimal as the flow structure does not change.
Scottish Power Distribution, SP Manweb	Yes	We expect to incur costs, which at this stage are unquantifiable, due to the need to train LDSO specific staff to manage the UMSO going forward.
Western Power Distribution	Yes	Any costs will be restricted to process and document changes.
Northern Powergrid	No	No provided.

Question 5: Do you agree with the proposed implementation approach for CP1522?

Summary

Yes	No	Neutral/No Comment	Other
6	1	0	0

Responses

Respondent	Response	Rationale
UK Power Networks	Yes	None provided.
Fulcrum Electricity Assets Ltd	Yes	None provided.
Scottish Power	Yes	As long as issues identified above are addressed.
Power Data Associates Ltd	Yes	Minimal changes are anticipated to Party and Party Agents systems and processes, therefore implementation at the earliest possible date is welcomed.
Scottish Power Distribution, SP Manweb	No	We do not agree with the proposed implementation date given that change does not take into account the proposed move to a centralised registration system and as such the BSCP will have to be re-opened to accommodate further change. An example of such a change is outlined in Section 3.1.22 (proposed BSCP)/ Section 3.2.10 etc. – a Supplier is charged with sending a D055 flow to SMRA for registration of Supplier to a Specified Metering Point. Under the new rules the D0055 flow will no longer be sent to SMRA, the Supplier will inform CSS directly, which in turn will pass the relevant information to the appropriate SMRA. The removal of this process within SMRA could have consequential changes throughout BSCP520 and in our view it would be more pragmatic to review this BSCP to meet the requirements of the significant industry change that is imminent. It is suggested that any changes to BSCP520 be aligned to the implementation date of CSS in order that a full solution be implemented.
Western Power Distribution	Yes	None provided.
Northern Powergrid	Yes	None provided.

Question 6: Do you have any further comments on CP1522?

Summary

Yes	No	Neutral/No Comment	Other
0	6	0	0

Responses

Respondent	Response
UK Power Networks	No
Fulcrum Electricity Assets Ltd	No
Scottish Power	No
Power Data Associates Ltd	No
Scottish Power Distribution, SP Manweb	No
Western Power Distribution	No
Northern Powergrid	No

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Respondent	Location	Comment
UK Power Networks	1.2.1	<p>Question whether the drafting reflects the way that IDNOs may operate under DCUSA/National Terms of Connection, whereby a customer with items connected to an IDNO network may elect to include those items in the inventory submitted to the "host" LDSO?</p> <p>In this case the IDNO is not appointing the "host" LDSO to be its UMSO, the customer is exercising an option. So for an LDSO that is an IDNO, they may have dealings with many UMSOs but may have appointed a different UMSO directly themselves.</p>
	1.3.5 (e)	As per Schedule 2 of the MRA, the supplier is responsible for the provision and maintenance of the MTC. It is not clear why the certificate issued by the UMSO should contain the MTC and whether that MTC should be the one the UMSO believes to be correct or the one the supplier has chosen?
	3.1.18	"Related Meter status" the supplier is responsible for managing the metering point relationship (see 3.1.23, 3.2.11) and this data items cannot be communicated by the UMSO. The UMSO can communicate the "metered" indicator however.
	3.1.23, 3.2.11	& update MTC if required?
	3.3.2.7	Typo – "UMAO"
	3.7.1	Typo – "UMSP"
	3.7.1/3.7.7	Not all physical works will cause a de-energisation. Add "as appropriate"

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Respondent	Location	Comment
Power Data Associates Ltd	1.2.1	In the last paragraph remove "an" from "where changes relate to an SMRA registration data".
	3.1.5	<p>Remove "SMRA Allocate", full stop after "certificate", and add full stop at end of sentence in Action column.</p> <p>In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.</p>

Respondent	Location	Comment
	3.1.19	<p>In Action column, brackets required on "MSID(s)" in all occurrences.</p> <p>In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.</p>
	3.1.21	<p>In the To column, the recipients should be realigned to clarify that UMS certificate should be sent to the Supplier by "Electronic or other agreed method", whilst communication with the customer is by "Paper, fax or electronic media, as agreed."</p> <p>Also remove blank line above "P0207....."</p>
	3.1.23	<p>In Information Required column reformat "Relationships"</p>
	3.2.7	<p>In Action column it could be that more than one MSID is required so reinstate the "(s)" after "additional" but not later in the sentence. Needs a full stop after "data".</p> <p>In From column it should be LDSO.</p> <p>In the Information Required column there is a footnote marker "21". Either copy footnote from BSCP501 or remove, relying on BSCP501 reference.</p>
	3.2.9	<p>In the To column, the recipients should be realigned to clarify that UMS certificate should be sent to the Supplier by "Electronic or other agreed method", whilst communication with the customer is by "Paper, fax or electronic media, as agreed."</p> <p>The reference to Appendix 4.4 in the Information Required is not needed here, or else it should be included wherever an UMS Certificate is issued by the UMSO, e.g. 3.1.21.</p>
	3.2.10	<p>Text needs realigning across row.</p>

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Respondent	Location	Comment
Scottish Power Distribution, SP Manweb	1.4 Section 3 second para	<p>We believe that this paragraph needs to be re-written. If the information sent includes an MPAN/MSID then the ICO deems that personal information and as such needs to be sent securely, which in the case of D flows should be over the DTN or other secure method, not e-mail. From a SP Distribution perspective any information sent to the MA would normally exclude MPAN information</p>

Respondent	Location	Comment
		and in such circumstances we would normally send the information via e-mail.
	3.1.5	We believe that the action needs to be clarified as it appears to be rather confusing. It may be more appropriate to use similar wording as in Section 3.1.19. There is also a similar point re both sections in that it is not clear how the UMSO is expected to pass on the UMS Certificate to the LDSO.
	3.2.7	SMRA to SMRA? This does not appear to make sense as at this time we do not exchange information between SMRA's.
	3.2.8	Should be SMRA to UMSO as it requires P0171 request creation of UMS skeleton SMRS record – the LDSO cannot send a request on behalf of SMRA
	3.7.7	We note that this section does not contain a Customer to UMSO requirement, whereas section 3.7.1 does. Is there any reason behind this omission?
	3.8.1 & 3.8.2	<p>Re 3.8.1 - In the action the word 'no' appears to be missing – It should read UMSO advises LDSO that MSID is no longer required and can be disconnected.</p> <p>However, we believe that Sections 3.8.1 and 3.8.2 are incorrect and need to be revised.</p> <p>Section 3.8.1 – The UMSO should not advise or determine that the LDSO is to disconnect the MSID, such an instruction should be directly from the customer to the LDSO who is responsible for managing the physical disconnection. The rules relating to disconnections are outlined in MAP21 under the MRA.</p> <p>Similarly in 3.8.2, once the disconnection is complete it is the LDSO who is responsible for advising all parties of such an action , therefore the LDSO in this instance should contact the SMRA, Supplier and UMSO.</p>

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Respondent	Location	Comment
Western Power Distribution	p.44 3.8	<p>New Section 3.8.2a</p> <p>On receipt of the D0125 Initiate a change to the metering point relationship</p> <p>From Supplier To SMRA</p> <p>Send D0386 to end the metering point relationship</p>

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Respondent	Location	Comment
Northern Powergrid	3.7.1	refers inaccurately to UMSP
	3.9.2.1	requires D0052 is sent on a new connection, this is not possible as no Supplier will have been appointed, to allow sending of the D0052