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**INITIAL WRITTEN ASSESSMENT OF
MODIFICATION PROPOSAL P62**

**Changes to Facilitate Competitive Supply On The Networks Of
New Licensed Distributors**

Prepared By ELEXON Limited

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A DOCUMENT CONTROL

a Authorities

Version	Date	Author	Signature	Change Reference
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Version	Date	Reviewer	Signature	Responsibility
0.1 + 1.0	11/01/02	Trading Strategy		

b Distribution

Name	Organisation
Each BSC Party	Various
Each BSC Agent	Various
The Gas and Electricity Markets Authority	Ofgem
Each BSC Panel Member	Various
energywatch	Energywatch
Core Industry Document Owners	Various

c Intellectual Property Rights and Copyright

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d Related Documents

The following documents are referenced from within this document using the following convention [RD/x]:

- 1 Panel Paper 30/026 – Provision for New Distribution Business, 20 September 2001
- 2 DBFG Document - Requirements Specification – New Licensed Distributors, Version 0.3, 3 January 2002

I	CONTENTS TABLE	
a	Document Control	2
a	Authorities	2
b	Distribution	2
c	Intellectual Property Rights and Copyright.....	2
d	Related Documents.....	2
I	Contents Table	3
1	Introduction	4
2	Executive Summary	4
3	Details of the Modification Proposal	5
3.1	Background	5
3.2	Existing Work	6
3.3	Modification Proposal P62	6
4	Impact on BSC Systems and Processes	9
5	Impact on Other Systems and Processes Used By Parties	9
6	Impact on Documentation	10
6.1	Impact on Balancing and Settlement Code	10
6.2	Impact on Code Subsidiary Documents	11
6.3	Impact on Core Industry Documents.....	11
7	Impact on ELEXON	11
8	Process and Timetable for Progressing the Proposal	12
9	Issues	13
	Annex 1 – Modification Proposal	16

1 INTRODUCTION

This Report has been prepared by ELEXON Ltd. on behalf of the Balancing and Settlement Code Panel ('the Panel'), in accordance with the terms of the Balancing and Settlement Code ('BSC'). The BSC is the legal document containing the rules of the balancing mechanism and imbalance settlement process and related governance provisions. ELEXON is the company that performs the role and functions of the BSCCo, as defined in the BSC.

An electronic copy of this document can be found on the BSC website, at www.elexon.co.uk

2 EXECUTIVE SUMMARY

The Utilities Act 2000 (which came into effect on 1st October 2001) creates a requirement for new licensed Distributors to be able to join the Balancing and Settlement Code (BSC) and the Master Registration Agreement (MRA), and comply with the Settlement Agreement for Scotland (SAS). In order to allow a new licensed Distributor to do this, changes will be required to all three agreements, and to associated Party and BSC Agent systems and processes.

The Distribution Business Focus Group (DBFG) is an industry group (established by the MRA Executive Committee (MEC)) which has examined a number of options for amending industry documents to support new licensed Distributors. Following consultation with Parties to the MRA and BSC, the DBFG have now recommended an approach, the key features of which are as follows:

- no change to Grid Supply Point (GSP) Groups, or Bulk Supply Point (BSP) Group in Scotland are proposed;
- all metering systems for a given Distributor will be registered in a single Supplier Meter Registration Service (SMRS), allowing easy identification of the Distributor and SMRS for each metering system.

Modification Proposal P62 was raised by TXU UK Ltd on 3 January 2002 in order to allow the BSC aspects of the proposed approach to be progressed under BSC governance.

This document has been prepared by ELEXON and provides an initial assessment of P62. ELEXON recognise three main issues related to the progression of this modification:

- the Requirements Specification [RD/2], produced by the DBFG, documents the high-level requirements and it is recognised these need to be further developed into a solution, prior to attempting formal Impact Assessment;
- the governance for the overall initiative is split between the BSC, MRA and SAS and each will be required to undertake a parallel set of modifications or change requests;
- a number of regulatory issues have been raised.

Based on these factors ELEXON recommend that P62 is progressed through the Assessment Procedure, and recommends a 2-month initial solution definition period,

reporting back to the Panel by way of an interim report on 14 March 2002. This interim report should document:

- the progress in addressing the regulatory issues;
- the results of detailed solution definition.

It is expected that this report will be used to seek a preliminary view from the Authority, as well as being used to determine the most appropriate time-scales for completing the Assessment Phase and in particular the formal impact assessment of the proposed solution.

P62 should be progressed by the existing Volume Allocation Modification Group (VAMG), with an appropriate level of representation from existing Distribution businesses, potential new Distribution businesses and Suppliers.

3 DETAILS OF THE MODIFICATION PROPOSAL

3.1 Background

Prior to the introduction of the Utilities Act in October 2001, distribution of electricity was not a distinct licensable activity. The licensing regime for Distributors was therefore as follows:

- the fourteen Public Electricity Suppliers (PES) had licence conditions related to distribution included in their PES licences;
- because distribution was not a licensable activity, other organisations were able to own and/or operate private networks, without any obligation to apply for a licence, or comply with the BSC, MRA or SAS.

The trading arrangements allow unlicensed private networks to be handled in one of the two ways, either where a single point of connection between the Public Distribution System and the unlicensed network is registered in SMRS but none of the entry and exit points are registered, or alternatively, the BSC (in England and Wales) allows the network to be 'adopted' by the Public Distribution System Operator (PDSO). In this case it would be treated for settlement and registration purposes as part of the Public Distribution System. All of the entry and exit points would be recorded in SMRS by the PDSO, and the network would therefore be open to competitive supply.

However, following the implementation of the Utilities Act on 1st October 2001, distribution of electricity is now a licensable activity, and as a result companies other than PDSO may be obliged (or choose) to obtain Distribution Licences. The obligations placed on such Licensed Distributors will include the following:

- an obligation to prepare a schedule of distribution charges and Line Loss Factors (LLF) (under Condition 4 of the standard licence);
- an obligation to become a BSC Party, if distributing electricity in England or Wales (under Condition 10 of the standard licence);

- an obligation to comply with the Settlement Agreement for Scotland (SAS), if distributing electricity in Scotland (under Condition 12 of the standard licence);
- an obligation to become a Party to the MRA (under Condition 14 of the standard licence).

Changes are required to the BSC, MRA and SAS in order to allow licensed Distributors to meet these obligations, and hence open up the networks to competitive supply.

Although P62 has been raised as a modification to the BSC, it is important to recognise it is part of a wider initiative that includes Scotland, and hence the SAS.

3.2 Existing Work

In order to provide a co-ordinated industry view of the changes required to support new licensed Distributors, the MRA Executive Committee (MEC) established a New Distribution Business Focus Group (DBFG). This has representatives from Suppliers, Distributors, MRASCo, ELEXON, SESL and Ofgem.

Discussion within the industry on how to facilitate competitive supply on the networks of licensed Distributors is already at a fairly advanced stage. The key settlement and registration issues were reported to the Panel in paper [RD/1], and these issues have since been progressed further by the DBFG.

On 6th November 2001, the DBFG issued for consultation¹ a high-level paper describing settlement and registration options. The responses to the consultation process resulted in a Requirements Specification [RD/2] being produced, currently undergoing review and approval by the BDFG and MEC.

Modification Proposal P62 provides a mechanism for amending the BSC in line with the results of the DBFG discussions and the requirements within [RD/2].

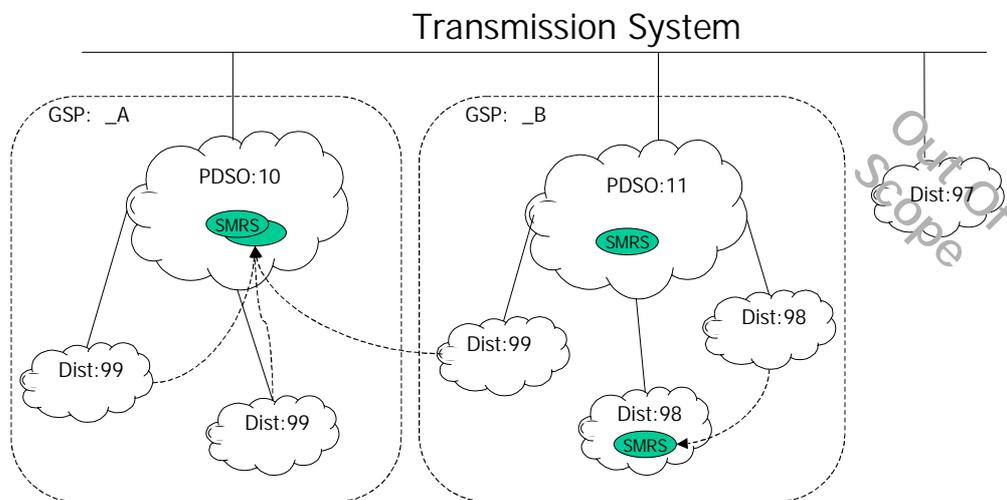
3.3 Modification Proposal P62

P62 was raised by TXU UK Ltd on 3 January 2002. The proposal details the changes to the BSC in order to incorporate the Electricity Distribution Licence changes. It also states that the mechanism for achieving this will be defined as a result of the work undertaken in the DBFG. Although not explicitly stated this is taken to mean as documented in the MEC approved version of [RD/2].

The following section provides a description of the proposed mechanism, for further details refer to [RD/2]. Figure 4.1 summarises the mechanism.

¹ The consultation paper was issued to all MRA Parties, and posted on the BSC website (www.elexon.co.uk).

Figure 4.1 – Overview of Modification P62



The mechanism proposed by DBFG expects new licensed Distributors to be embedded within an existing PDSO and hence there is no requirement for new GSP Groups² (as shown for example Dist 97 in Figure 4.1).

Figure 4.1 also shows the proposed registration of Metering Systems in SMRS, using dotted arrows to indicate the SMRS responsible for each Distribution network³. As documented in [RD/2] each licensed Distributor may provide an SMRS (as shown for example Dist 98) or procure one (as shown for example Dist 99). In each case the proposed mechanism is that all Distributors will only use a single SMRS (as shown for Dist 99 in both GSP Group _A and _B).

This means that for each Supplier in the example GSP Group _B there may potentially be 3 different sets of data within each aggregated file (NNHDA, HHDA) sent to SVAA, one for each Distribution business (PDSO 11, Dist 98 and Dist 99). In addition individual DUoS reports will be created by SVAA for each of these 3 sets of data.

In addition to the restriction regarding creation of new GSP Groups and directly connecting to the Transmission System, there are also three important areas that are outside the scope of P62:

- registration of the metering point between two distribution networks in CMRS, this is explicitly excluded within the Modification Proposal;
- commercial considerations on how the LLF and DUoS for each Distribution network are calculated and proportioned;

² [RD/2] states there will be no change to the definition of a GSP Group and that no new GSP Groups will be introduced. However, the text of the Modification Proposal is less precise and is limited to no change in the definition of a GSP Group. ELEXON believe that as DBFG have restricted their consideration of competitive supply in new GSP Groups, in the assessment of the proposed mechanism within [RD/2], then it is appropriate for consideration of P62 to do likewise. As described in section 3.2.1 of [RD/2] the view of the DBFG was that another Modification Proposal should be raised should a Distributor wish to amend the BSC definition of a GSP Group.

³ Within an Electricity Distribution Licence there may be no direct obligation for a Distributor to provide or procure SMRS services, DBFG proposed that this obligation be applied to the Distributor through the MRA and BSC. In addition there is no obligation for a Distributor to provide SMRS services to a Distributor in another GSP Group.

- transferring metering points from one Distribution business to another, either for commercial reasons or as a result of a failing Distribution business or SMRS. This is recorded as an issue within [RD/2] and no requirements are specified to provide this functionality.

4 IMPACT ON BSC SYSTEMS AND PROCESSES

BSC System / Process	Potential Impact of Proposed Modification
Registration	The proposed mechanism requires all entry and exit points within the new distribution network to be registered in a single SMRS. Where the Distributor operates in more than one GSP Group this means the chosen SMRS must be able to hold details in such a manner that allows the GSP Group as well as the Distributor to be identified.
Collection and Aggregation of Metered Data	The aggregation of metered data must be able to handle multiple Distributors within each GSP group, with each Data Aggregator being able to send an aggregated file to SVAA containing individual data sets for each Distributor that a Supplier uses within the GSP Group.
Supplier Volume Allocation	SVAA must be able to combine the multiple sets (one for each Distributor / Supplier combination) of data within each file produced by the Data Aggregators. In addition SVAA must be able to generate additional DUoS reports to cover the new combinations of Supplier/Distributor/GSP Group.
Settlement	The proposed mechanism has been designed to limit the changes to the SVAA systems and hence minimise the impact on the rest of Settlement. However it needs to be recognised that there may be some associated changes as a result of breaking the existing one to one link between GSP Group and Distributor.
Reporting	SVAA must be able to generate additional DUoS reports to cover the new combinations of Supplier/Distributor/GSP Group. In addition the reports within each GSP Group must only identify the assets associated with that Distributor, and not others within the GSP Group.

5 IMPACT ON OTHER SYSTEMS AND PROCESSES USED BY PARTIES

System / Process	Potential Impact of Proposed Modification
Party Systems	Some Supplier and Party Agent systems may assume that there is only one Distributor and one SMRA per GSP Group. Changes will be required to these systems. This includes the Non Half Hourly Data Aggregation (NHHDA) software provided by ELEXON. It should be noted that changes to Party Agent Systems may raise the issue of certification, which may have an impact on BSC Systems and Processes.

6 IMPACT ON DOCUMENTATION

6.1 Impact on Balancing and Settlement Code

BSC Section	Potential Impact of Proposed Modification
H: General	Extend the obligations on a PDSO to include all licensed Distributors
J: Party Agents	The entry process requirements in J5.1 are currently drafted in a way that assumes a single SMRA per GSP Group. These should be clarified to allow for the possibility of multiple SMRA per GSP Group.
K: Classification and Registration of Metering Systems and BM Units	Changes to reflect the obligation in K1.7 to submit Line Loss Factor values in accordance with BSCP28 and/or BSCP528 and the obligation in K3.1 to ensure that a Distributor's SMRS satisfies an SMRS Entry Process in accordance with BSCP511 before providing registration services.
L: Metering	Extend the obligations on a PDSO to include all licensed Distributors
R: Collection and Aggregation of Metered Data from CVA Metering Systems	Impact on Aggregation rules of new Distributors embedded within PDSO.
S: Supplier Volume Allocation	Extend the obligations on a PDSO relating to Unmetered Supply to include all licensed Distributors
V: Reporting	Recognition that the SVAA DUoS report needs to be index by Supplier within Distributor within GSP Group.
X: Definitions and Interpretation	Changes to the definitions of boundaries and definition of Total System

6.2 Impact on Code Subsidiary Documents

Code Subsidiary Document	Potential Impact of Proposed Modification
BSC Procedures	It is likely that the majority of BSC Procedures will need to be changed in order to reflect the BSC changes. Procedures that are definitely believed to be impacted include BSCP501, BSCP502, BSCP503, BSCP504, BSCP507, BSCP511, BSCP512, BSCP520 and BSCP528. It may also be considered that a new BSCP would help clarify the operation of the Distribution Businesses.
Party Service Lines	It is likely that the majority of Party Service Lines will need to be changed in order to reflect the BSC changes.
Data Catalogues	Potential changes if data flows changes
Reporting Catalogue	Minor changes to reflect the changes to the DUoS reporting

6.3 Impact on Core Industry Documents

Core Industry Document	Potential Impact of Proposed Modification
Master Registration Agreement	This Modification Proposal is part of a wider initiative to make all the necessary changes to the BSC, MRA and SAS in support of the introduction of new licensed Distributors within the Utilities Act 2000.
Settlement Agreement for Scotland	This Modification Proposal is part of a wider initiative to make all the necessary changes to the BSC, MRA and SAS in support of the introduction of new licensed Distributors within the Utilities Act 2000.

7 IMPACT ON ELEXON

Area of Business	Potential Impact of Proposed Modification
ELEXON Procedures	The only impact identified at this time is on Performance Management procedures, although the impact of certification of changed Party Agent systems will need to be considered.

8 PROCESS AND TIMETABLE FOR PROGRESSING THE PROPOSAL

ELEXON recognise three main issues related to the progression of this modification:

- the Requirements Specification [RD/2] produced by the DBFG documents the high-level requirements and it is recognised these need to be developed into a solution, prior to attempting formal Impact Assessment;
- the governance for the overall initiative is split between the BSC, MRA and SAS and each will be required to undertake a parallel set of modifications or change requests;
- a number of regulatory issues have been raised.

Based on these factors ELEXON recommend that this Modification is progressed through the Assessment Procedure, and recommend a 2-month initial solution definition period, reporting back to the Panel by way of an interim report on 14 March 2002. This interim report should document:

- the progress in addressing the regulatory issues;
- the results of further solution definition.

The results of these will be used to determine the most appropriate time-scales for completing the Assessment Phase and in particular the formal impact assessment of the proposed solution.

The modification should be progressed by the existing Volume Allocation Modification Group, with an appropriate level of representation from existing Distribution businesses, potential new Distribution businesses and Suppliers.

P62 is considered complex and will probably require three Modification Group meetings. In addition it will require further solution definition to be performed by ELEXON, under guidance of the Modification Group. ELEXON consider that the first stage of the Assessment Procedure (prior to the Interim Report) will be achievable within an initial £50K budget, however, ELEXON believe this may need to be revisited prior to commencing the second phase.

During the early stages of the Assessment Procedure the Modification Group will need to be aware progress of the regulatory issues and also other actions being performed outside of the Modification Group:

- P62 is unusual in that there has already been a substantial consultation exercise performed on the issues, within the governance of the MRA. The group need to recognise this and the level of work that has already been expended in constructing the proposed mechanism. ELEXON propose to perform an early BSC consultation, based on this IWA and the Requirements Specification [RD/2], in order to seek initial views on the work already performed by the DBFG;
- the parallel change processes within the governance of the MRA and SAS, and the impact of altering the proposed mechanism as defined by [RD/2]. The group need to

consider how to co-ordinate further design work with the other forums addressing different aspects of the overall change;

- it is anticipated that P62 will also require the completion of more detailed system design than is normally appropriate for an Assessment Phase. This is required to unambiguously resolve some of the issues outside the scope of the Modification Proposal and minimise the risk of late changes, which otherwise may require another BSC Modification Proposal.

Given the complexity of this initiative and the parallel change processes, ELEXON note that early analysis and consultancy may be required from relevant BSC Agents prior to requesting formal Impact Assessment during the second stage of the Assessment Procedure.

9 ISSUES

A number of regulatory policy and/or legal issues have been raised in relation to this Modification Proposal that will need to be resolved with Ofgem and potentially the DTI. Key among these are:

- whether the obligation on new distribution businesses to provide an MPAS service will be included in the licence, or only in the BSC and/or MRA;
- whether the DFBG's proposals with respect to the definition of the MRA and DTS services are permitted within the existing legal framework without further licence modifications;
- consideration of how the licence will apply in respect of a licensee owning more than one physical distribution network, or whether in some circumstances a single legal entity could hold more than one distribution licence;
- the exclusion of directly connected networks from the Modification Proposal;
- the handling of exempt suppliers within previously private distribution networks.

In addition P62 is part of a larger initiative which itself raises issues:

- it is a complex modification requiring co-ordination of changes to the MRA and SAS. Some of these will be developed by other groups, which are responsible for addressing other aspects of the overall problem;
- the initial work and the Requirements Specification is still being reviewed and is not yet authorised within the MRA. Even when authorised further refinement of the solution will be required;
- significant software changes will be required in order to support the requirements. There is a risk that one or more new distribution licences are issued prior to completion of these software changes, and that the metering points on the new networks will not be properly registered or open to competitive supply;

- as the proposed mechanism is a result of a consultation exercise performed under the governance of the MRA, ELEXON believe it would be useful to perform an initial consultation within the governance of the BSC, in order to seek initial views on the work already performed by the DBFG.

There are four issues associated with this Modification Proposal that are defined as being outside scope:

- the current definition of GSP Group is such that a new network directly connected to the transmission system would have to be treated as a new GSP Group. The issues associated with the creation of new GSP Groups, or their definition, are outside the scope of this modification, as specified by [RD/2];
- the commercial arrangements to calculate and proportion LLF and DUoS is outside the scope of P62 and may raise additional requirements, in order to ensure effective competition of supply;
- registration of the metering point between two distribution networks in CMRS, this is explicitly excluded within the Modification Proposal;
- P62 does not address the issue of what happens if a Distributor and/or MPAS should cease trading (e.g. by entering into administration), or should a Distributor wish to transfer a Distribution network to another Distribution business.

It is recognised these are important aspects of the overall requirements for new Distribution Businesses and that further consideration in other forums may result in changes to the proposed mechanism. It is likely these will need to be accommodated.

In addition the following more detailed issues have been identified. These will need to be considered as part of P62:

- the changes identified in this document concentrate on those on BSC Agent systems, the Modification Group also need to recognise the additional changes to Party Agent systems and the operation of these systems. The issue of certification will also need to be considered;
- the proposed mechanism obliges each licensed Distributor to provide or procure an SMRS, even though there may not be any direct licence obligation to do so. The intention is that this obligation will be placed on the Distributor through the MRA and BSC (compliance with the MRA and BSC being a licence obligation for all licensed Distributors);
- in the case of Distributors operating in multiple GSP Groups, they will not have the option of using the SMRS provided by each PDSO within the local distribution services area. This arguably undermines the intent of condition 37 of the standard licence, which states that each distribution services provider shall, upon request, provide a Metering Point Administration Service for other distribution systems within his distribution services area;

- the proposed mechanism records the identity of the Distributor in the 2 digit Distributor Short Code in each MPAN. Care must be taken to avoid using up the small range of valid values and minimising the need to change MPANs once assigned;
- currently the key 'unit' of Supplier entry process is a combination of Supplier, Supplier Agents and GSP Group. It's not entirely clear how this should change to cater for new SMRA and this may need to be changed to a combination of Supplier, Supplier Agents, SMRA and GSP Group. A Supplier Hub may have to do an entry process for each combination of SMRA and GSP Group;
- the proposed mechanism suggests that Supplier Agents and BSC Agents should send data flows (e.g. DUoS reports) to new Distributors. The logical mechanism for doing this would appear to be the Data Transfer Service (DTS). However, it is not clear that this is consistent with the allowed users of the DTS as listed in the standard Distribution Licence;
- there is an outstanding issue within [RD/2] relating to whether a meter between the two distribution systems should be registered within CRMS to support DUoS Billing. Although this is outside the scope of this Modification Proposal, the outstanding issue needs to be recognised;
- there is already other work in progress for the SVAA and NHHDA systems and any additional changes will need to be prioritised;
- in the case where a Distributor owns multiple physical distribution networks within a single GSP Group, it may be that the impacted Distributors and Suppliers would want to identify in some manner, the usage of each physical network, as reported in the single DUoS report for that Distributor;
- [RD/3] contains some desirable requirements relating to changes to MDD and the ability of systems to validate Supplier/Distributor combinations. The value of these needs to be considered in terms of a cost / benefit analysis.

ANNEX 1 – MODIFICATION PROPOSAL

Modification Proposal	MP No: 62 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal <i>(mandatory by proposer):</i> Changes to Facilitate Competitive Supply On The Networks Of New Licensed Distributors	
Submission Date <i>(mandatory by proposer):</i> 4 January 2002	
Description of Proposed Modification <i>(mandatory by proposer):</i> <p>Currently the only licensed Distributors in England and Wales are the twelve Public Distribution System Operators (PDSO). The BSC facilitates competition in supply for the customers on their networks, by obliging PDSO to provide a Supplier Meter Registration Service (SMRS), and obliging Suppliers to register their imports and exports. However, the Utilities Act 2000 enables organisations other than PDSOs to become licensed Distributors. New Licensed Distributors will not be subject to the same BSC obligations as PDSOs, and this will hinder competition in supply for customers on their networks.</p> <p>It is therefore proposed to amend the BSC to extend the benefits of competitive Supply to customers on the networks of all Licensed Distributors. (It should be noted that Licensed Distributors will be obliged to become Parties to the BSC by condition 10 of the standard licence.)</p> <p>Discussion within the industry on how to facilitate competitive supply on the networks of licensed Distributors is already at a fairly advanced stage. The key settlement and registration issues were reported to the Panel in paper P/30/26, and these issues have since been progressed further by a New Distribution Business Focus Group (DBFG) set up by the MRA Executive Committee (MEC). This Modification Proposal is intended to provide a mechanism for amending the BSC in line with the results of these discussions.</p>	
Description of Issue or Defect that Modification Proposal Seeks to Address <i>(mandatory by proposer):</i> <p>Currently the BSC fails in a number of ways to facilitate competition in Supply for customers on the networks of Licensed Distributors other than PDSO:</p> <ol style="list-style-type: none"> 1) It places no obligations on Distributors and Suppliers to ensure that all the entry and exit points are recorded on an SMRS. 2) It defines the terms 'Supplier Meter Registration Agent' and 'Supplier Meter Registration Service' in a way that precludes anyone other than a PDSO from fulfilling the role. 3) It does not allow anyone other than a PDSO to fulfill other key Distributor obligations e.g. maintaining inventories of Unmetered Supplies, and submitting Line Loss Factors to settlement. <p>The combined effect of these defects is that Suppliers will find it extremely difficult to provide competitive Supply to customers on these networks.</p>	

Modification Proposal	MP No: 62 <i>(mandatory by BSCCo)</i>
<p>Impact on Code <i>(optional by proposer):</i></p> <p>Further analysis is required to define in detail the required BSC changes. However, based on discussions at the Registration and Settlement Subgroup of the DBFG, it is anticipated that the changes required to the BSC are likely to include the following:</p> <ol style="list-style-type: none">1) The commercial boundary of the BSC (i.e. the definition of 'Total System') should be extended to include the networks of all licensed Distributors. The intention of this is to ensure that all entry and exit points from licensed Distribution networks must be registered (in SMRS or CMRS).2) The definitions of 'Supplier Meter Registration Agent' (SMRA) and 'Supplier Meter Registration Service' (SMRS) should be amended to allow any licensed Distributor to perform the role. (This is consistent with the recommendation of the DBFG that each licensed Distributor should be obliged to provide or procure an SMRS for its own networks).3) Where appropriate, current PDSO obligations under the BSC should be extended to all licensed Distributors. Examples include the obligation in K1.7 to submit Line Loss Factor values in accordance with BSCP28 and/or BSCP528; the obligation in K3.1 to ensure that the SMRS satisfies an entry process in accordance with BSCP511; and the obligations in S8.2 relating to Unmetered Supply.4) The entry process requirements in J5.1 are currently drafted in a way that assumes a single SMRA per GSP Group. These should be clarified to allow for the possibility of multiple SMRA per GSP Group. <p>Note that this Modification Proposal is only intended to cover the changes required to open the networks of licensed Distributors to competitive supply. The following additional changes have also been discussed at the DBFG, but are NOT intended to fall within the scope of this Modification Proposal:</p> <ol style="list-style-type: none">1) Changes to the definition of GSP Group (to provide more freedom in the allocation of new networks to GSP Groups and/or facilitate competitive supply for networks directly connected to the transmission system). Such changes raise additional issues of principle, and are best treated as a separate issue.2) Changes to allow Distributors to register within CMRS the boundary metering between two Distribution Systems in the same GSP Group. (Such metering is not required for the purposes of Supplier Volume Allocation, but may be desirable for other reasons e.g. ensuring that the allocation of DUoS charges between Suppliers is equitable.)	
<p>Impact on Core Industry Documents <i>(optional by proposer):</i></p> <p>This change will also impact a number of Core Industry Documents:</p> <ul style="list-style-type: none">- The DBFG is planning to report back to MEC on changes required to the Master Registration Agreement.- Similar issues arise in Scotland, and changes may therefore be required to the Settlement Agreement for Scotland.- Changes may be required to the Data Transfer Service Agreement.	

Modification Proposal	MP No: 62 <i>(mandatory by BSCCo)</i>
Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties <i>(optional by proposer):</i>	
<p>The functionality within the Supplier Volume Allocation Agent (SVAA) system that reports metered volumes to Distributors currently assumes that there can only be one Distributor per GSP Group. Enhancements to the SVAA system will be required to remove this constraint.</p> <p>Similarly, some Supplier and Supplier Agent systems may assume that there is only one Distributor and one SMRA per GSP Group. Changes will also be required to these systems. This includes the Non Half Hourly Data Aggregation (NHHDA) software provided by ELEXON.</p>	
Impact on other Configurable Items <i>(optional by proposer):</i>	
Changes are likely to be required to a number of BSC Procedures and other configurable items.	
Justification for Proposed Modification with Reference to Applicable BSC Objectives <i>(mandatory by proposer):</i>	
<p>This Modification Proposal is aimed at facilitating competition in the supply of electricity to customers connected to the networks of Licensed Distributors. It therefore facilitates the achievement of the Applicable BSC Objective in Condition C3(3)(c) of the Transmission Licence (i.e. "promoting effective competition in the generation and supply of electricity").</p>	
Details of Proposer:	
<p style="padding-left: 40px;">Name: Philip Russell</p> <p style="padding-left: 40px;">Organisation: TXU UK Ltd.</p> <p style="padding-left: 40px;">Telephone Number: 01473 555 688</p> <p style="padding-left: 40px;">Email Address: phil.russell@txu-europe.com</p>	
Details of Proposer's Representative:	
<p style="padding-left: 40px;">Name: Philip Russell</p> <p style="padding-left: 40px;">Organisation: TXU UK Ltd.</p> <p style="padding-left: 40px;">Telephone Number: 01473 555 688</p> <p style="padding-left: 40px;">Email Address: phil.russell@txu-europe.com</p>	
Details of Representative's Alternate:	
<p style="padding-left: 40px;">Name: Terry Marquand</p> <p style="padding-left: 40px;">Organisation: TXU UK Ltd</p> <p style="padding-left: 40px;">Telephone Number: 07879 801 088</p> <p style="padding-left: 40px;">Email Address: terry.marquand@txu-europe.com</p>	

Modification Proposal	MP No: 62 <i>(mandatory by BSCCo)</i>
Attachments: NO If Yes, Title and No. of Pages of Each Attachment:	