

**INITIAL WRITTEN ASSESSMENT for Modification Proposal P223
'Profile Administrator Service'**

Prepared by ELEXON

For Decision	Date of Issue	4 April 2008	Version Number	1.0
Overview or Purpose of Document:				
P223 seeks to improve the Profile Administrator Service by replacing the existing process of recruitment of new customers / Metering System Identifiers (MSID) into the profiling sample and the resultant data collection process with a new process as detailed in this document.				
BSCCo's Recommendations				
On the basis of the initial assessment, BSCCo invites the Panel to:				
<ul style="list-style-type: none">• DETERMINE that Modification Proposal P223 should be submitted to the Assessment Procedure;• AGREE the Assessment Procedure timetable such that an Assessment Report should be completed and submitted to the Panel for consideration at its meeting of 10 July 2008;• DETERMINE that the P223 Modification Group be formed from members of the Volume Allocation Standing Modification Group (VASMG); and• AGREE the Modification Group Terms of Reference.				
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Summary of Impacted Parties And Documents

As far as BSCCo has been able to assess, the following parties/documents are potentially impacted by Modification Proposal P223.

Please note that this table represents a summary of the full initial impact assessment results contained in Appendix 2.

Parties		BSC Sections		Code Subsidiary Documents	
Distribution System Operators	<input type="checkbox"/>	A	<input type="checkbox"/>	BSC Procedures	<input checked="" type="checkbox"/>
Generators	<input type="checkbox"/>	B	<input type="checkbox"/>	Codes of Practice	<input type="checkbox"/>
Interconnectors	<input type="checkbox"/>	C	<input type="checkbox"/>	BSC Service Descriptions	<input checked="" type="checkbox"/>
Licence Exemptable Generators	<input type="checkbox"/>	D	<input type="checkbox"/>	Party Service Lines	<input type="checkbox"/>
Non-Physical Traders	<input type="checkbox"/>	E	<input type="checkbox"/>	Data Catalogues	<input type="checkbox"/>
Suppliers	<input checked="" type="checkbox"/>	F	<input type="checkbox"/>	Communication Requirements Document	<input type="checkbox"/>
Transmission Company	<input type="checkbox"/>	G	<input type="checkbox"/>	Reporting Catalogue	<input type="checkbox"/>
Party Agents		H		Core Industry Documents	
Data Aggregators	<input checked="" type="checkbox"/>	I	<input type="checkbox"/>	Ancillary Services Agreement	<input type="checkbox"/>
Data Collectors	<input checked="" type="checkbox"/>	J	<input type="checkbox"/>	Data Transfer Services Agreement	<input type="checkbox"/>
Meter Administrators	<input type="checkbox"/>	K	<input type="checkbox"/>	Distribution Code	<input type="checkbox"/>
Meter Operator Agents	<input checked="" type="checkbox"/>	L	<input type="checkbox"/>	Distribution Connection and Use of System Agreement	<input type="checkbox"/>
ECVNA	<input type="checkbox"/>	M	<input type="checkbox"/>	Grid Code	<input type="checkbox"/>
MVRNA	<input type="checkbox"/>	N	<input type="checkbox"/>	Master Registration Agreement	<input type="checkbox"/>
BSC Agents		O	<input type="checkbox"/>	Supplemental Agreements	<input type="checkbox"/>
SAA	<input type="checkbox"/>	P	<input type="checkbox"/>	Use of Interconnector Agreement	<input type="checkbox"/>
FAA	<input type="checkbox"/>	Q	<input type="checkbox"/>	BSCCo	
BMRA	<input type="checkbox"/>	R	<input type="checkbox"/>	Internal Working Procedures	<input checked="" type="checkbox"/>
ECVAA	<input type="checkbox"/>	S	<input checked="" type="checkbox"/>	BSC Panel/Panel Committees	
CDCA	<input type="checkbox"/>	T	<input type="checkbox"/>	Working Practices	<input type="checkbox"/>
TAA	<input type="checkbox"/>	U	<input type="checkbox"/>	Other	
CRA	<input type="checkbox"/>	V	<input type="checkbox"/>	Market Index Data Provider	<input type="checkbox"/>
SVAA	<input type="checkbox"/>	W	<input type="checkbox"/>	Market Index Definition Statement	<input type="checkbox"/>
Teleswitch Agent	<input type="checkbox"/>	X	<input type="checkbox"/>	Connection and Use of System Code	<input type="checkbox"/>
BSC Auditor	<input type="checkbox"/>	Z	<input type="checkbox"/>	System Operator-Transmission Owner Code	<input type="checkbox"/>
Profile Administrator	<input checked="" type="checkbox"/>			Transmission Licence	<input type="checkbox"/>
Certification Agent	<input type="checkbox"/>				
Other Agents					
Supplier Meter Registration Agent	<input type="checkbox"/>				
Unmetered Supplies Operator	<input type="checkbox"/>				
Data Transfer Service Provider	<input type="checkbox"/>				

1 Description of Proposed Modification

This IWA has been drafted in anticipation of the Panel agreeing to ELEXON's recommendation that this Modification Proposal should be raised. The recommendation was presented to the Panel on 10 April 2008 in Panel paper 139/06.

1.1 *Background*

P223 has been raised following Issue 29 'Profile Administration (PrA) Model' as it is believed that there exists equipment replacement and recruitment issues with the current Profile Administration process. Issue 29 was raised by the Panel on 23 August 2007 following ELEXON's presentation of the issues at the Supplier Volume Allocation Group (SVG) meeting held on 31 July 2007 (Reference 1).

The identified issues have led to dwindling sample sizes and, as a consequence, problems in the data accuracy of load research samples as there is an insufficient number of participants to enable a sufficient amount of data for the Profile Administration sample.

Further details of these issues are contained in Section 1.2 of this IWA, and within the Issue 29 'Profile Administrator (PrA) Model' Panel paper (Reference 2). The Volume Allocation Standing Modification Group (VASMG), which considered Issue 29, recommended that a modification should be raised.

Prior to Issue 29, similar issues were previously discussed in Issue 21 'Scope of Profiling Administration Service' in late 2005/early 2006. Under Issue 21, the VASMG examined issues with the ability of the Profile Administrator (PrA) to meet the service obligations set out in the Balancing and Settlement Code ('the Code'). The VASMG concluded at that time that a Modification Proposal was not required, since there were a number of measures which it believed could be taken to strengthen the processes without requiring a change to the scope of the PrA Service (Reference 3). However, under Issue 29 the VASMG concluded that the issues remained significant enough to warrant the raising of a Modification Proposal.

1.2 *Profile Administrator*

The PrA is the BSC Agent responsible for the production of load profiles that are used in the Settlement of Non Half Hourly electricity consumption. The PrA gathers metered data from a sample of Non Half Hourly customers, based on information provided by Suppliers. This data is then analysed to derive the regression coefficient data for the Supplier Volume Allocation Agent (SVAA) for use in the calculation of profile coefficients. A profile coefficient is an estimate of the fraction of yearly consumption within each Settlement Period. This assists with accurate allocation of Non Half Hourly consumption at any given time for Settlement purposes.

However there are problems with the current PrA model which are documented below:

(a) *Equipment Replacement Issues*

- **Lack of space for new PrA Equipment** – The need to install a second meter for profiling purposes (to record consumption on a Half Hourly basis) in addition to the currently existing Settlement meter has caused a large number of Sample Participants to retire from the existing samples due to lack of space to install this additional metering;

- **Lack of GSM signal**– Some Sample Participants in the present sample have sufficient space for the new equipment but do not have sufficient Global System for Mobile (GSM) signal in order for data to be collected remotely. The PrA can fit high-gain aerials in some instances but cannot undertake any work that significantly affects the Sample Participant's property;
- **Sample Participants unwilling to sign up to new Terms and Conditions** – When replacing the equipment, the existing Sample Participants are required to sign up to new Terms and Conditions relating to the new equipment. Significant numbers would not sign these and did not always state their reasons. One issue highlighted by customers was the liability of £100k for any damage to the domestic Sample Participant's property. Customers felt that the £100k offered was not reflective of current property prices;
- **Sample Participants unwilling to power down to allow equipment to be fitted** – In order to fit the new equipment there is a requirement to power down the Sample Participant's premises for a short period of time. The PrA is not able to change the metering solution without approval from the Sample Participant. There are a number of Sample Participants who are unwilling to allow this to happen as it would affect their business; and
- **Access issues and stranded assets** – There have been a large number of instances where the PrA has been unable to obtain access to existing sample customer premises in order to fit the new metering solution. This causes two issues: reduction in sample size and liability issues regarding the existing assets which are stranded at the Sample Participant's premises.

(b) Recruitment issues

- **Regional dispersion of domestic Sample Participants** – The current recruitment methods such as using Electricity Industry Staff and their friends and family has raised a number of issues, most notably that Sample Participants were too frequent in certain geographic regions and non-existent in others. The PrA is required by the Code to maintain a 'Stratified Random Sample'. The requirement should define a number of Sample Participants to be recruited in each region by size of customer. As the sampling variable is consumption, and this information is held by the Supplier, it is nearly impossible for the PrA to identify which customers in the population are suitable for recruitment since the PrA is not able to establish their consumption. At present the randomness of the sample is also compromised as, instead of taking data randomly from the Supplier's population (portfolio) of customers, the PrA can only recruit parties who are willing to take part in the sample thus building in a bias;
- **Lack of diversity in non-domestic uptake when targeting group customers** – Although potentially large numbers of Sample Participants can be gained through targeting group customers e.g. branches of a supermarket chain, this has the potential to bias the sample in a number of ways. For example, the PrA has signed up Staffordshire County Council. They have a number of potential sites all in the Staffordshire region. If the PrA accepted all these sites into the sample the site would be over represented in both customer type and regional spread. There are similar issues with retail groups and the Ministry of Defence, all of whom have large numbers of potential sites; and

- **Data protection issues with approaching Suppliers with lists of Metering System Identifiers** – The recruitment process detailed in BSCP510 ‘Supplier Meter Registration Service’ requires the PrA to approach Suppliers with a list of Metering System Identifiers (MSIDs) to obtain information on the customer’s Billing Address, the type of Settlement meter/ equipment at the property and an estimate of the customer’s consumption. The latter is important for identifying where the customer sits within the sampling frame. Some Suppliers have raised issues surrounding data protection and the supply of information to ‘Third Party’ Agents (i.e. the PrA). This results in difficulty for the PrA in identifying the suitability of potential customers for inclusion in the PrA samples.

(c) Impact of Issues on Settlement

In the absence of Half Hourly metered data, the Half Hourly consumption of domestic customers and the majority of non-domestic customers is estimated using load profiling. This sample is designed to be representative of the types of customer in each Profile Class and the required numbers in the sample are derived from a statistical calculation broken down by Profile Class, customer type and customer consumption. This technique is reliant on the analysis of historic consumption patterns of a representative sample of customers. As with any statistical technique, in order for it to provide an accurate estimate, the underlying sample data must be representative of its customer type and consumption level (as represented under the BSC, its Profile Class).

Failure to maintain a representative sample will lead to deterioration in the quality of the load profiles, and this will in turn lead to the Non Half hourly Data used in Settlement becoming less and less reflective of actual average consumption patterns. If the number of customers in the sample decreases, this will impact confidence that the resultant profiles will accurately reflect an average customer’s consumption in a Profile Class. Settlement addresses any errors through the use of the Grid Supply Point (GSP) Group Correction Factor.¹ Faced with deteriorating profile data, this factor will become more volatile and Suppliers will find it increasingly difficult to predict the physical position that they will be attributed in Settlement. Due to the dwindling sample sizes over the past few years this confidence has decreased, to such an extent that the SVG agreed that the profiles for use in Settlement for April 2008 to end of March 2009 should reuse the Settlement profiles from the previous year.²

Profiles which do not accurately reflect the average daily shape in a Profile Class could lead to large and potentially unpredictable variances in GSP Group Correction Factors. This could impact both large and small Suppliers by exposing them to imbalance if they are not able to predict this variance. Inaccurate profiles are likely to have the biggest impact on small niche Suppliers, since such Suppliers are more likely to only be active in one particular Profile Class.

1.3 Modification Proposal

P223 seeks to replace the existing process of recruitment of new customers into the profiling sample and the resultant data collection process with a new process. P223 proposes that the details of the new PrA process be based on the following “straw man” which was developed by the Issue 29 Group:

¹ GSP Group Correction Factor is a factor that adjusts correctable energy so that the total energy is equal to the GSP Group Take e.g. corrects errors such as Large Estimated Annual Consumption (EAC) / Annualised Advance (AA) values and errors with Profiling.

² See Panel Paper [137/01b](#).

1. BSCCo with support from the PrA will specify the sample and recruitment targets by Supplier for inclusion in the PrA samples, including customer type, Profile Class, consumption level, etc;
2. BSCCo/PrA will notify Suppliers of the information required for the profiling sample;
3. Suppliers will be obligated under the Code to provide confirmation to the PrA which customers and MSIDs are suitable;
4. BSCCo/PrA will then notify Suppliers which MSIDs are required for the load research sample;
5. Suppliers will be required to provide a metering solution of sufficient functionality such that the metering collects both Non Half Hourly data as per the normal Settlement process and provides Half Hourly data to the PrA for load research purposes;
6. Suppliers can either appoint the PrA's nominated Meter Operator Agent (MOA), Non Half Hourly Data Collector and Aggregator (NHHDC and NHHDA) to those customers or provide their own agents;
7. The Supplier is responsible (and may use the PrA's nominated agents) for submitting normal Non Half Hourly data for that customer/MSID into Settlement;
8. The Supplier's obligations remain unaltered regardless of whether the Supplier decides to use its own, rather than the PrA's MOA, NHHDC and NHHDA; and
9. The Supplier is responsible (and may use the PrA's NHHDC) for collecting the Half Hourly data and sending it to the PrA which will be used by the PrA for profile production purposes.

Under the Change of Supplier process for a MSID that is in the load research sample, the new Supplier will be obliged under the Code to provide both Non Half Hourly data for Settlement purposes and Half Hourly data to the PrA for profile production purposes.

Therefore the modification is designed to improve the PrA process, in turn increasing the number of Sample Participants and in turn ensuring that the necessary amount of data and the provision of representative samples are used in the derivation of profiles. The modification will:

- Improve the accuracy of the Settlement process, and therefore estimation of the Half Hourly consumption of domestic customers and the majority of non-domestic customers; and
- Avoid an increase in the volatility of GSP Group Correction Factors, and hence volatility in the physical position of Suppliers.

It is believed that the modification would better facilitate Applicable BSC Objective (d)³ as it would deliver greater profiling accuracy derived from a suitable sample and thereby promote the more accurate determination and allocation to BSC Parties of the quantities of electricity delivered to and taken off the total system. It may also be argued that P223 better facilitates Applicable BSC Objective (c),⁴ as more accurate Settlement profiles may reduce the risk for certain niche Suppliers being unable to predict their Imbalance volumes - thereby promoting competition.

Therefore it is proposed that P223 will:

- Allow for resolution of the issue on space constraints by providing a smart metering solution (i.e. delivered through a single meter on site);

³ Applicable BSC Objective (d) 'Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'.

⁴ Applicable BSC Objective (c) 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity'.

- Allow for the existing liability arrangements to cater for damage to a customer's property arising from this single meter, which will therefore be the same as for any other Supplier customer;
- Allow for the existing Supplier rights to cater for changing meters (and powering down), as the Supplier has the right to change the meter especially for those whom were due to have their metering changed via the meter replacement programs;
- Allow for the existing Supplier rights to ensure access is gained, as the Supplier has the right of access to the metering equipment whereas currently the PrA relies on goodwill from the customer.
- Resolve the stranded asset issue as there is no secondary metering owned by BSCCo; and
- Resolve the data protection issue, as the Supplier can appoint its own Supplier Agent as it would not need to pass customer details onto Third Party Agents.

2 Areas for Consideration in Progressing Modification Proposal

An initial assessment of P223 has identified the following areas which BSCCo recommends should be considered further during the progression of the Modification Proposal:

2.1 Detailed Solution

ELEXON recommends that a Modification Group should develop a detailed solution which will need to include the consideration of:

- The most appropriate line of communication between Suppliers, agents and the PrA (including whether any changes may be required to the Master Registration Agreement's (MRA) Data Transfer Catalogue (DTC) or Data Transfer Network (DTN));
- The process by which the PrA informs Suppliers which Participant Samples are required;
- How Suppliers would utilise the option to use the PrA's Party Agents (NHHDC, NHHDA and MOA);
- Whether there is an issue with P223 introducing the retrospective appointment of MOAs. This is where a MOA is retrospectively appointed following the installation of a meter. The logic behind this is that it is inefficient to appoint a MOA who might subsequently establish when at the customer's premises that they are unable to install the metering solution, and consequently has to be de-appointed again; and
- How the proposed P223 process would interact with a Change of Supplier, Change of Supplier Agent or/and Change of Tenant.

And therefore establish whether the solution addresses the issues outlined in 1.2 (a) and (b).

2.2 *Theoretical modelling*

BSCCo recommends that a Modification Group attempts to quantify the risks to Settlement and industry participants from the issues identified under P223, and the benefits of the proposed solution. BSCCo suggests that the best approach would be to develop hypothetical scenarios based on assumptions where a range of risks and benefits can be looked at, and the impact of these on different types and sizes of Parties.

For example, one scenario could be to attempt to estimate the impact of inaccurate GSP Group Correction Factors on a small niche Supplier.

BSCCo proposes to discuss some potential scenarios with the Modification Group at its first meeting. It is proposed that the actual analysis will be undertaken prior to the industry consultation, such that the scenarios can be included in the consultation document and used by Parties in considering the potential benefits of P223.

3 *Rationale for BSCCo's Recommendations to The Panel*

BSCCo believes that further consideration of P223 by a Modification Group is required in order to further consider, and consult upon, the areas raised by this IWA. As the areas for consideration are sufficiently defined, BSCCo recommends that P223 proceed to the Assessment Procedure.

BSCCo recommends that P223 be submitted to a 3 month Assessment Procedure. The drivers for a 3-month timescale are the desirability of developing the theoretical scenario models and establishing the P223 implementation costs prior to undertaking the Assessment Procedure consultation.

It is estimated that progression of P223 will require:

- 4 Modification Group meetings;
- 1 BSC Agent impact assessment (by the PrA);
- 1 Party/Party Agent impact assessment;
- 1 BSCCo impact assessment;
- 1 request for Transmission Company analysis;
- Analysis of potential risk/benefit scenarios; and
- 1 industry consultation.

The proposed timetable and estimated costs for the progression of P223 are shown in Appendix 3.

BSCCo recommends that the P223 Modification Group be formed from members of the Volume Allocation Standing Modification Group (VASMG), whose areas of expertise include Non Half Hourly data profiling.

BSCCo recommends that the areas for consideration raised by this IWA should form the basis of the Modification Group Terms of Reference, along with any additional areas proposed by the Panel.

4 *Terms Used In This Document*

Other acronyms and defined terms take the meanings defined in the Code.

Acronym/Term	Definition
GSM	Global System for Mobile
PrA	Profile Administrator
VASMG	Volume Allocation Standing Modification Group
NHHDC	Non Half Hourly Data Collector
NHHDA	Non Half Hourly Data Aggregator
MOA	Meter Operator Agent
MSID	Metering System Identifier
GSP	Grid Supply Point

5 Document Control

5.1 Authorities

Version	Date	Author	Reviewer	Reason for Review
0.1	01/04/08	Sherwin Cotta	Kevin Spencer	For peer review
0.1	01/04/08	Sherwin Cotta	Steve Francis	For technical review
0.2	02/04/08	Sherwin Cotta	Kathryn Coffin, David Jones	For quality review
1.0	10/04/08	Change Delivery		For Panel decision

5.2 References

Ref.	Document Title (webpage)	Owner	Issue Date	Version
1	Straw Man PrA Model for discussion by Potential Issue Group – SVG Paper 78/05 ELEXON - Supplier Volume Allocation Group (SVG) Papers - Meeting Number 078 - 31/07/07	ELEXON	09/07/07	1.0
2	Issue 29 'Profile Administrator (PrA) Model' – Panel Paper 135/01e ELEXON - BSC Panel Paper Meeting number 135 - 17/01/08	ELEXON	11/01/2008	1.0

Ref.	Document Title (webpage)	Owner	Issue Date	Version
3	Issue 21 'Scope of Profiling Administration Service' – Panel Paper 112/06 <u>ELEXON - BSC Panel Paper Meeting number 112 - 09/03/06</u>	ELEXON	02/03/2006	1.0

Appendix 1: Modification Proposal

Modification Proposal – BSCP40/03	MP No: P223 <i>(mandatory by BSCCo)</i>
Title of Modification Proposal	
Improvements to the Profile Administrator Service	
Submission Date: 10 April 2008	
Description of Proposed Modification:	
<p>The aim of the Modification Proposal is to replace the existing process of recruitment of new customers/ Metering System Identifiers (MSIDs) into the profiling sample and the resultant data collection process with a new process. The Group would discuss and conclude the exact details of that new process based on the following "straw man" developed by the Issue 29 Group:</p> <ul style="list-style-type: none">• BSCCo with support from the Profile Administrator (PrA) will specify the sample and recruitment targets by Supplier for inclusion in the PrA samples, including customer type, Profile Class, consumption level, etc;• BSCCo/PrA will notify Suppliers of the information required for the profiling sample;• Suppliers will be obligated under the BSC to provide confirmation to the PrA which customers (and MSIDs) are suitable;• BSCCo/PrA will then notify Suppliers which MSIDs are required for the load research sample;• Suppliers will be required to provide a metering solution of sufficient functionality such that the metering collects both Non Half Hourly data as per the normal Settlement process and provides Half Hourly data to the PrA for load research purposes;• Suppliers can either appoint the PrA's nominated Meter Operator Agent (MOA), Non Half Hourly Data Collector and Aggregator (NHHDC and NHHDA) to those customers or provide their own agents;• The Supplier is responsible (and may use the PrA's nominated agents) for submitting normal Non Half Hourly data for that customer/MSID into Settlement;• The Supplier's obligations remain unaltered regardless of whether the Supplier decides to use its own, rather than the PrA's MOA, NHHDC and NHHDA; and• The Supplier is responsible (and may use the PrA's NHHDC) for collecting the Half Hourly data and sending it to the PrA which will be used by the PrA for profile production purposes. <p>Under the Change of Supplier process for an MSID that is in the load research sample, the new Supplier will be obliged under the Code to provide both Non Half Hourly data for Settlement purposes and Half Hourly data to the PrA for profile production purposes.</p>	

<h2 style="margin: 0;">Modification Proposal – BSCP40/03</h2>	MP No: P223 <i>(mandatory by BSCCo)</i>
Description of Issue or Defect that Modification Proposal Seeks to Address	
<p>Issues with the current Profile Administration process have lead to data accuracy problems with the load research sample, these have included difficulties with maintaining a sufficient number of participants and collecting a sufficient amount of data for the Profile Administration sample.</p> <p>This modification seeks to improve the process of maintaining sufficient numbers of representative customers in Great Britain in each Profile Class in the Profile Administration Sample, to ensure that the necessary amount of data is used in the derivation of Profiles. This modification therefore seeks to improve quality of these profiles to maintain the accuracy and integrity of the Non Half Hourly Settlement processes.</p>	
Impact on Code	
<p>Section S: 2.7.5 and 4.2</p>	
Impact on Core Industry Documents or System Operator-Transmission Owner Code	
<p>N/A</p>	
Impact on BSC Systems and Other Relevant Systems and Processes Used by Parties	
<p>Profile Administrator Service</p>	
Impact on other Configurable Items	
<p>BSCP 510 'The Provision Of Sampling Data To The Profile Administrator' SVAA Service Line SSL310 for the SVA Agent – Daily Profile Production</p>	

Modification Proposal – BSCP40/03	MP No: P223 <i>(mandatory by BSCCo)</i>
Justification for Proposed Modification with Reference to Applicable BSC Objectives	
<p>There are current issues with the Profile Administration process with regards to sample size, recruitment and data collection, as presented to the Panel under Issue 29 in paper 135/01e. These issues need addressing in order to maintain the integrity and accuracy of the profiling element of the Non Half Hourly Settlement processes. If these issues are not addressed there could be inaccurate Settlement of Non Half Hourly energy across all Profile Classes resulting in impacts on:</p> <p>Applicable BSC objective (d) 'Promoting efficiency in the implementation and administration of the balancing and settlement arrangements'. This modification would improve the process for obtaining customers in the profiling sample and collecting and maintaining the associated Half Hourly Data for the construction of the profiles used in Settlement; and</p> <p>Applicable BSC objective (c) 'Promoting effective competition in the generation and supply of electricity, and (so far as consistent therewith) promoting such competition in the sale and purchase of electricity'. Therefore, this modification would improve the Settlement of Non Half Hourly data especially for niche/small Suppliers who have customers/demand focussed in particular areas.</p>	
Urgency Recommended: No	
Justification for Urgency Recommendation N/A	
Details of Proposer: <i>Name.....BSC Panel.....</i> <i>Organisation.....</i> <i>Telephone Number.....</i> <i>Email Address.....</i>	
Attachments: No	

Appendix 2: Initial Assessment Of Impacts Of Modification Proposal

An initial assessment has been undertaken by BSCLCo in respect of all BSC systems, documentation and processes. The following have been identified as being potentially impacted by P223.

a Impact on BSC Systems and Processes

BSC System / Process	Potential Impact of Proposed Modification
PrA	The PrA's operational processes will require revision in line with the proposed straw man, and in particular, new processes will be required to enable the PrA to procure and/or provide MOA, NHHDC and NHHDA services to Suppliers where necessary.

b Impact on BSC Agent Contractual Arrangements

BSC Agent Contract	Potential Impact of Proposed Modification
IMServ (Profile Administrator)	The contractual arrangements will need to be amended to reflect the requirement for the PrA to offer MOA, NHHDC and NHHDA services to Suppliers for Metering Systems within their sample.

c Impact on BSC Parties and Party Agents

• Suppliers

Suppliers will be required to allow for the installation of metering that provides both Non Half Hourly data for Settlement purposes and Half Hourly data for load research. Where a Supplier chooses not to appoint the PrA's nominated agents, the Supplier will need to arrange for the procurement and installation of the necessary metering and will be responsible for the provision of the resulting Half Hourly data to the PrA. Where the PrA's nominated agents are appointed, however, the Half Hourly data may be obtained by the PrA without the Supplier's direct involvement. In either case, the Supplier will retain the overall responsibility for ensuring that normal Non Half Hourly data is submitted into Settlement.

• Meter Operator Agents

Existing MOAs will be required to install the metering solution as provided by the Supplier. This could either involve the MOA installing Half Hourly data logging and remote reading equipment in successfully recruited customer premises, or replacing the meter with one that is capable of simultaneously providing both Non Half Hourly and Half Hourly data.

• Non Half Hourly Data Collectors

Existing NHHDCs would continue to collect, process and submit Non Half Hourly data into Settlement.

d Impact on Transmission Company

None

e **Impact on BSCCo**

Area of Business	Potential Impact of Proposed Modification
Support to PrA customer recruitment processes	<p>P223 should reduce the effort spent by BSCCo outside of the existing BSCP510 process in helping the PrA attempt to recruit participants to the load research sample (e.g. producing adverts).</p> <p>P223 will require amendments to BSCCo's working practices, since the proposed solution requires BSCCo (with support from the PrA) to specify the sample/recruitment targets and notify Suppliers of these.</p>

f **Impact on Code**

Code Section	Potential Impact of Proposed Modification
Section S 'Supplier Volume Allocation'	<p>Section S of the Code will need to be amended to reflect new obligations on Suppliers to:</p> <ul style="list-style-type: none"> • Provide applicable MSIDs to the PrA for the load research sample; • Provide a metering solution which will deliver PrA data requirements; and • Assume responsibility for collecting Half Hourly Data and sending it to the PrA.

g **Impact on Code Subsidiary Documents**

Document	Potential Impact of Proposed Modification
BSCP504 'Non Half Hourly Data Collection for SVA Metering Systems Registered in SMRS'	May be impacted if new obligations are placed on NHHDAs and NHHDCs.
BSCP505 'Non Half Hourly Data Aggregation for SVA Metering Systems Registered in SMRS'	As above.
BSCP510 'The Provision of Sampling Data to the Profile Administrator'	BSCP510 should be expanded to include the Supplier obligations and interactions relating to the metering, collection and provision of the Half Hourly data required for load research.
Profile Administrator Service Description	Will require amendment to detail the new obligations placed on the PrA.
SVA Data Catalogue	May require amendment to reflect any changes in communications between Party Agents and the PrA.

h **Impact on Core Industry Documents and Other Documents**

None anticipated at this stage. However, depending on the detailed solution developed by the Modification Group, it is possible that changes may be required under the MRA to the DTN/DTC.

i **Impact on Other Configurable Items**

Document	Potential Impact of Proposed Modification
PrA Service Description	Revisions will be required to explain the new obligations of the PrA in relation to provision of MOA, NHHDC and NHHDA services.

j **Impact on BSCCo Memorandum and Articles of Association**

None

k **Impact on Governance and Regulatory Framework**

None

Appendix 3: Costs And Timetable For Progression

ESTIMATED COSTS OF PROGRESSING MODIFICATION PROPOSAL ⁵	
Meeting Cost	£2,000
Legal/Expert Cost	Nil
Impact Assessment Cost	£5,000
ELEXON Resource	80 man days £16,700

⁵ Clarification of the meanings of the cost terms in this appendix can be found on the BSC Website at the following link:
http://www.elexon.co.uk/documents/Change_and_Implementation/Modifications_Process_-_Related_Documents/Clarification_of_Costs_in_Modification_Procedure_Reports.pdf

The Gantt chart illustrates the project timeline across four months:

- April 2008:** Tasks 1 through 18 are shown. Task 1 (Start drafting IWA) begins on Mon 31/03/08 and ends on Thu 03/04/08. Task 10 (Conduct Impact Assessment) starts on Tue 29/04/08 and ends on Tue 13/05/08. Task 18 (Update Consultation document with comments) starts on Thu 29/05/08 and ends on Thu 29/05/08.
- May 2008:** Tasks 19 through 28 are shown. Task 19 (Conduct Consultation) starts on Fri 30/05/08 and ends on Thu 12/06/08. Task 28 (Update Assessment Report) starts on Fri 27/06/08 and ends on Mon 30/06/08.
- June 2008:** Tasks 29 through 31 are shown. Task 29 (Internal Paper day) starts on Tue 01/07/08 and ends on Tue 01/07/08. Task 30 (External Paper day) starts on Fri 04/07/08 and ends on Fri 04/07/08. Task 31 (Assessment Report presented to Panel) starts on Thu 10/07/08 and ends on Thu 10/07/08.
- July 2008:** A single task, "01", is shown starting on Fri 01/07/08 and ending on Fri 01/07/08.

Task Table:

ID	Task Name	Duration	Start	Finish
1	Start drafting IWA	4 days	Mon 31/03/08	Thu 03/04/08
2	Request Panel to raise P223	0 days	Thu 10/04/08	Thu 10/04/08
3	IWA presented to Panel	0 days	Thu 10/04/08	Thu 10/04/08
4	MG meeting 1	1 day	Fri 11/04/08	Fri 11/04/08
5	Draft Requirements Specification	3 days	Mon 14/04/08	Wed 16/04/08
6	MG meeting 2	1 day	Thu 17/04/08	Thu 17/04/08
7	Update Requirements Specification	3 days	Fri 18/04/08	Tue 22/04/08
8	Group to review Requirements Specification	3 days	Wed 23/04/08	Fri 25/04/08
9	Update Requirements Specification with comments	1 day	Mon 28/04/08	Mon 28/04/08
10	Conduct Impact Assessment	11 days	Tue 29/04/08	Tue 13/05/08
11	Scenario analysis	11 days	Tue 29/04/08	Tue 13/05/08
12	Start drafting Legal text	11 days	Tue 29/04/08	Tue 13/05/08
13	Start drafting Consultation document	11 days	Tue 29/04/08	Tue 13/05/08
14	Collate responses and forward onto Group	2 days	Wed 14/05/08	Thu 15/05/08
15	MG meeting 3	1 day	Mon 19/05/08	Mon 19/05/08
16	Update Consultation document	3 days	Tue 20/05/08	Thu 22/05/08
17	Group to review Consultation document	4 days	Fri 23/05/08	Wed 28/05/08
18	Update Consultation document with comments	1 day	Thu 29/05/08	Thu 29/05/08
19	Conduct Consultation	10 days	Fri 30/05/08	Thu 12/06/08
20	Draft Legal text	10 days	Fri 30/05/08	Thu 12/06/08
21	Draft Assessment Report	10 days	Fri 30/05/08	Thu 12/06/08
22	Collate Consultation responses	2 days	Fri 13/06/08	Mon 16/06/08
23	MG meeting 4	1 day	Tue 17/06/08	Tue 17/06/08
24	Group to review Legal text	3 days	Wed 18/06/08	Fri 20/06/08
25	Update Assessment Report	3 days	Wed 18/06/08	Fri 20/06/08
26	Group to review Assessment Report	4 days	Mon 23/06/08	Thu 26/06/08
27	Update Legal text	4 days	Mon 23/06/08	Thu 26/06/08
28	Update Assessment Report	2 days	Fri 27/06/08	Mon 30/06/08
29	Internal Paper day	0 days	Tue 01/07/08	Tue 01/07/08
30	External Paper day	0 days	Fri 04/07/08	Fri 04/07/08
31	Assessment Report presented to Panel	0 days	Thu 10/07/08	Thu 10/07/08